

To: Audit, Risk and Scrutiny Board

On: 28 August 2017

Report by: Director of Finance and Resources

Heading: Records Management Plan Update

1 Summary

- 1.1 In accordance with the Public Records (Scotland) Act 2011, the Council created a Records Management Plan ("RMP") to guide continual improvement of its record keeping. The Council's RMP was approved by Council on 25 February 2016 and it was decided that an annual report would be submitted to the former Audit, Scrutiny and Petitions Board.
- 1.2 Agreement of the RMP was reached with the Keeper of the Records of Scotland on 16 August 2016.
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2 Recommendations

- 2.1 To note that – the RMP not only offers compliance with the Public Records (Scotland) Act 2011, but also aims to guide improvements in record keeping for the overall betterment of the Council and its work.
- 2.2 To note that – the continual auditing and assessing of the RMP are an important element of its successful implementation and that annual reports to this board are an important part of that.

3 **Background**

- 3.1 The Public Records (Scotland) Act 2011 (“PRSA”) came into force on 1 January 2013. Under the PRSA, named Scottish public authorities are required to manage their corporate records efficiently and effectively. To this end, each of these authorities must submit a formal records management plan (“RMP”) to the Keeper of the Records of Scotland (“the Keeper”) for his approval. The Keeper has published a ‘model RMP’ that explains the various elements he would expect to see in a public authority RMP. The Council’s own RMP is based on this model
- 3.2 The Council submitted its records management plan to the Keeper on 31 March 2016 after being approved by Council on 25 February 2016 and by Renfrewshire Licensing Board on 07 March 2016 as a joint RMP. Conditional agreement from the Keeper was received on 16 August 2016.
- 3.3 That means that the Keeper has fully accepted 11 out of the 16 elements of the RMP with the remaining 5 elements being on an “Improvement Route.” The full assessment report can be provided by the Records Manager or is available from:
- <http://www.nrscotland.gov.uk/record-keeping/public-records-scotland-act-2011/assessment-reports>
- 3.4 Being on an “Improvement Route” means that the RMP has self identified gaps in the required elements that require further improvement to implement and evidence they are in place. While there is still much work to be done before the Council has a fully agreed RMP, the Keeper has stated that the Council’s RMP is robust with a detailed action plan for closing the gaps identified.
- 3.5 The Council has until the year 2021 to have its RMP fully agreed with the Keeper. The elements that still require agreement are:
1. Element 4 - Business classification
 2. Element 6 - Destruction arrangements
 3. Element 7 - Archiving and transfer arrangements
 4. Element 11 - Audit trail
 5. Element 13 - Assessment and review

Further details on the elements listed above are provided in the following paragraphs.

- 3.5. **‘Element 4 – Business Classification’** requires that the Council know the records it creates and where they are held. This is evidenced through a document called the Business Classification Scheme (“BCS”). This element requires the most work and will take the longest to complete with an anticipated completion in 2019. Work is underway to implement the BCS as a file plan on shared drives throughout the organisation.
- 3.6. In support of this work officers have been identified throughout service areas that will be tasked with producing reports on their service’s shared folders using an analysis tool. Initial training has been delivered and guidance created. These reports will help to identify file duplication, files passed their retention, and areas where files can be managed better.
- 3.7. **‘Element 6 - Destruction arrangements’** requires that adequate procedures are in place for the destruction of records across the organisation regardless of format. There is considerable work involved to arrange this across the electronic systems. Systems that are currently earmarked for replacement or upgrade are being prioritised. The Records Manager provides retention advice to ICT colleagues who are reviewing systems or implementing new ones. Physical records must be regularly disposed of as well, which the importance of has been highlighted by the amount of confidential waste generated due to office moves.
- 3.8. Moving forward, the message is to remove the ROT. ROT (redundant, obsolete or trivial) is information and records that continue to be retained even though there is no business or legal value. The Council’s Corporate Records Retention Schedule is a key document in tackling ROT and is accessible from the Council’s website. Likewise, the reports discussed in paragraph 3.6 will be invaluable to this work.
- 3.9. **‘Element 7 - Archiving and transfer arrangements’** requires the Council to have made proper arrangements for the permanent preservation of records of enduring value. Renfrewshire Leisure manages the Council’s historical collection when records have outlived their business use and have been flagged for long term preservation. The Council’s Corporate Retention Schedule identifies series of records that should be preserved and additional guidance has been produced to help staff identify further records that may have historical value but are outside currently identified series.
- 3.10. The intent is to collect records that show how the Council has been managed, its impact on the Renfrewshire area, as well as bringing in records that have historical significance for the region. For instance,

members of the public sometimes get in touch when they have found items that may be of interest.

- 3.11. This element is critical to ensuring long term that decisions made by the Council can be understood by future generations and that the community of Renfrewshire can make the most of their cultural assets.
- 3.12. **‘Element 11 - Audit trail’** requires systems to be in place to allow the Council to know where its records are at all times. Audit trails within electronic systems are adequate for this element and the mobile working technology in place within the Council ensures that electronic records are not leaving systems. The largest gap identified is where any paper records are routinely moved from where they are stored within the Council. Check In / Check Out lists should be used for any instance not already covered by a system in place. Guidance is circulated through the Records Management Working Group and the Information Management and Governance Group. Furthermore, the Records Manager can always be contacted for assistance where any further gaps are identified by services or guidance needs to be tailored to suit a specific need.
- 3.13. **‘Element 13 - Assessment and review’** makes provisions for the self assessment of the RMP so that an organisation can determine how well it complies. The Council’s Chief Auditor has chosen the Records Management Plan as one of the audits being conducted this year, with the audit currently underway. Having this done early will provide a valuable baseline measurement to assess the current provisions and plan for future ones. In addition to the input from Internal Audit, the organisation will continue to self assess its own progress through the Council’s Records Management Working Group and Information Management and Governance Group.
- 3.14. Being on an “Improvement Route” requires updates to the Keeper on progress. Similar to the original submission, authorities will be invited to provide updates to the Keeper through a formal letter issued to the Chief Executive from the Keeper. The benefit of providing annual updates is that this should avoid any formal reassessment at the end of the five year period. Invitation to submit can be expected at any point as the first year anniversary has now passed (16 August).
- 3.15. Annual updates will be provided to this Board (or any successor Board with responsibility for audit) on a meeting date nearest to the anniversary of initial agreement with the Keeper. Additional reports may also be submitted if anything substantially changes with regard to legislation or the Council’s own implementation.
- 3.16. The biggest risk associated with successful implementation of the RMP is the capacity of staff and services to do the work required in addition to normal business activities. This risk will be minimised, in so far as possible, by aligning implementation alongside normal duties wherever

possible. This risk is also mitigated by good records management supporting staff in being as efficient as possible with regard to information matters.

- 3.17. While there is still much work ahead to get the final five elements fully agreed, it should also be noted that even once the RMP is fully agreed there will always be work required to maintain and continually improve records management within the organisation. Yet, as noted in the preceding paragraph, this work is necessary to provide valuable tools to the Council to better manage one of its greatest assets.

Implications of the Report

1. **Financial** – *none*
2. **HR & Organisational Development** – *none*
3. **Community Planning** – Implementing good records management principles within the organisation supports the Council to deliver on its key objectives and priorities.
4. **Legal** – Implementation of the Records Management Plan is a key element in complying with the Public Records (Scotland) Act 2011.
5. **Property/Assets** – *none*
6. **Information Technology** – *none*
7. **Equality & Human Rights** - The Recommendations contained within this report have been assessed in relation to their impact on equalities and human rights. No negative impacts on equality groups or potential for infringement of individuals' human rights have been identified arising from the recommendations contained in the report because for example it is for noting only. If required following implementation, the actual impact of the recommendations and the mitigating actions will be reviewed and monitored, and the results of the assessment will be published on the Council's website.
8. **Health & Safety** – *none*
9. **Procurement** – *none*
10. **Risk** – *none*

11. **Privacy Impact** - Effective records management can only have a positive impact on people's privacy whereby records are only retained for as long as necessary and are kept securely.

12. **Cosla Policy Position** – *none*

List of Background Papers

(a) *none*

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