



**Renfrewshire Council and
Renfrewshire Licensing Board**

Records Management Plan

January 2016

v 1.0

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Related Documents

Ref	Document Name/ Version	Document Location
	Records Management Policy	Renfo
	Data Protection Policy	Renfo
	Information Security Policy	Renfo
	Freedom of Information Policy	Renfo

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Background

The Public Records (Scotland) Act 2011 (hereafter referred to as 'PRSA') came fully into force in January 2013. The Act obliges public organisations in Scotland to prepare and implement a records management plan (RMP). The RMP sets out the arrangements for the proper management of records within those organisations.

Renfrewshire Council and Renfrewshire Licensing Board are submitting a joint RMP in recognition of the integrated nature of the work and shared staffing between the two authorities. Administration of the Board and the management of its records conforms to the records management principles of the Council.

The plan excludes Joint Boards who, as separate legal entities, are required, under the Act, to submit individual RMPs.

The following RMP is based on the Keeper's published Model RMP with extra elements added for Freedom of Information as a pillar of Information Governance within Scotland and for Contracts to recognise instances when functions are carried out on behalf of an authority. The Model Plan has 14 Elements, which are listed below, with the two additional elements listed at 15 and 16.

- | | |
|--|---|
| 1. Senior management responsibility | 10. Business continuity and vital records |
| 2. Records manager responsibility | 11. Audit trail |
| 3. Records management policy statement | 12. Competency framework for records management staff |
| 4. Business classification | 13. Assessment and review |
| 5. Retention schedules | 14. Shared information |
| 6. Destruction arrangements | Additional Elements |
| 7. Archiving and transfer arrangements | 15. Freedom of Information |
| 8. Information security | 16. Contracts |
| 9. Data protection | |

The following plan demonstrates the intent of Renfrewshire Council and Renfrewshire Licensing Board to be committed to continuous improvement in the way in which both manage and use their records. Therefore, this plan is designed to be dynamic, rather than static, in order to meet challenges as they rise.

For more information about the PRSA, visit the website of the National Records of Scotland:

<http://www.nationalrecordsofscotland.gov.uk/record-keeping/public-records-scotland-act-2011>

A copy of the Act can be viewed online via the National Archives website:

<http://www.legislation.gov.uk/asp/2011/12/contents>

Records Management Plan Elements

Element 1: Senior Management Responsibility

Senior Management responsibility for Renfrewshire Council's RMP lies with:

Alan Russell
Senior Information Risk Owner ("SIRO") and Director of Finance and Resources
Renfrewshire House
Renfrewshire Council
Cotton Street
Paisley PA1 1JB

Tel: 0300 300 0300

Email: finit@renfrewshire.gov.uk

Senior Management responsibility for Renfrewshire Licensing Board RMP lies with:

Kenneth Graham
Clerk to the Board
Renfrewshire House
Renfrewshire Council
Cotton Street
Paisley PA1 1JB

Tel: 0300 300 0300

Email: licensing.cs@renfrewshire.gov.uk

Evidence:		
1	Letter from Sandra Black, Chief Executive confirming roles.	Appendix 1
2	Letter from Clerk of Licensing Board confirming roles.	Appendix 2

Element 2: Records Manager Responsibility

The individual answerable to Senior Management within Renfrewshire Council and Renfrewshire Licensing Board and who has operational responsibility for records management within those authorities is:

Joseph Bartoletti
Records Manager
Renfrewshire Council
Cotton Street
Paisley
Renfrewshire PA1 1TR

Tel: 0141 618 5149

Email: joseph.bartoletti@renfrewshire.gcsx.gov.uk

The Records Manager chairs the Data Protection, Freedom of Information, and Records Management Working Groups and is a member of the Information Management and Governance Group. The Records Manager holds a relevant records management qualification.

Evidence:		
1	Letter from Sandra Black, Chief Executive confirming roles.	Appendix 1
2	Letter from Clerk of Licensing Board confirming roles.	Appendix 2
3	Job Outline for Records Manager Post	Appendix 3

Element 3: Records Management Policy Statement

The Council and Licensing Board have a statutory requirement to “make proper provision for the preservation and management” of their records; to be publicly accountable for and able to justify their decisions and actions; and to enable compliance with the requirements of the PRSA, the Data Protection Act 1998, the Freedom of Information (Scotland) Act 2002 and the Environmental Information (Scotland) Regulations 2004.

The PRSA places an obligation on the Council and Licensing Board to prepare and implement a RMP which sets out efficient arrangements for the management of the Council and Licensing Board’s records.

An effective records management system is essential to ensuring records are captured, managed and preserved or destroyed in an organised manner, maintaining their integrity and authenticity.

The Council’s Records Management Policy applies to all staff and the records they create over the course of their duties. As Renfrewshire Licensing Board is administered by Council staff, this document applies to its records as well. The Records Management Policy is available to all staff on the Council’s intranet, [Renfo](#).

Action Plan:			
	Action	Date	Action by
1	Review Records Management Policy	November 2018	Records Manager

Evidence:		
1	Records Management Policy	Appendix 4

Element 4: Business Classification

As noted within the aforementioned Records Management Policy, Renfrewshire Council has adopted the Local Government Classification Scheme (LGCS) as the basis for its Business Classification Scheme (BCS). The LGCS is developed from a concept of functional classification as opposed to a model based on the structure of the organisation itself. Classification of records in this manner allows for the organisation itself to undergo periodic restructure, while the management of its records remains relatively unchanged. It also allows for better sharing of information between departments when implemented electronically as a file plan.

The Council acknowledges that while the LGCS has been adopted, it still requires further adaptation and implementation. The following steps are being taken to establish the framework in which full integration of the scheme will take place throughout the Council.

This also applies to Renfrewshire Licensing Board as it is administered by Council staff and uses the same locations and systems to store and manage its records.

The Council currently stores its information and records across an array of physical storage locations (office shelving, store rooms, and the Corporate Records Store etc.), shared drives, line of business applications, and a corporate Electronic Document Management System (EDMS). Records contained within physical systems, line of business applications, and the EDMS will be mapped to the relevant section of the BCS and noted at the relevant tier of the BCS. Moving forward the BCS will also be implemented as a file plan across shared drives.

At this time the Council does not have an Electronic Document and Records Management System (EDRMS) to impose governance on unstructured data. Currently EDRMS is being investigated by Renfrewshire Council's ICT service area, but there are no definitive plans as of yet. Even though this is the current position within the organisation, work can and will commence on restructuring the shared drives according to the BCS and this work will compliment any potential future implementation of an EDRMS.

Work has already commenced on improving the current shared drives through the Council's Information Management and Governance Group ("IMGG"). The Records Management Working Group ("RMWG") will feed into this process and building off the work done under Element 5 will map the systems currently used to store their records to the BCS. This process will also show where the BCS needs to be adapted or expanded further.

Once the process is complete, the Corporate Retention Schedule (Element 5) and the BCS will be merged to form a single document. Further developments to both documents will include the following information:

- Function;
- Activity;
- Transaction (type of record / information);
- Sub-folders
- Vital records / location of original and working copy;

- Access rights; and
- Responsible service(s).

The RMWG will consult with service areas through their representative to the group regarding bringing their sections of the BCS in line with the list above. Record locations (across formats) will be identified along with physical volume currently retained and approximations of future storage needs for forward planning.

Where the Council has contracted out a function to a third party, the function will not be removed, but rather this will be noted in order to better help maintain management of those records. If such a third party would like to use the Scheme then this can be facilitated through the Council's Records Manager.

Action Plan:			
	Action	Date	Action by
1	RMWG consultation with service areas to identify record locations against BCS	January – June 2016	Records Manager / RMWG
2	Develop targeted plan based on consultation	July 2016	Records Manager / RMWG
3	Implementation Phase	August 2016 – July 2019	RMWG / Service Areas
4	Soft market testing for EDRMS, minimum EDRMS requirements building, and review of current EDMS against those requirements	February – August 2016	ICT / Records Manager

Evidence:		
1	Business Classification Scheme	Appendix 5
2	Terms of Reference for IMGG	Appendix 6
3	IMGG Minutes for 3 September 2015 Meeting	Appendix 7
4	Terms of Reference for RMWG	Appendix 8
5	RMWG Minutes for 1 December 2015 Meeting	Appendix 9

Element 5: Retention Schedules

Renfrewshire Council and Renfrewshire Licensing Board have both adopted a modified version of the Scottish Council for Archives Records Retention Schedule (SCARRS) as the basis for the Council's approved retention schedules. The retention schedules use the functional approach to classification as opposed to an organisational design in order that they may be more resilient to changes to the structure of the organisation and ensure consistency for classes of records that are held throughout the organisation.

As noted above, the retention schedules are structured by function due to the benefits that brings. However, through the addition of a column (SA), a service area code is listed to tie the

functions back to the organisation. Each two letter code correlates to a service area of the Council. The service areas are as follows

- CE – Chief Executive
- CR – Community Resources
- CS – Children’s Services
- DH – Development & Housing Services
- FR – Finance & Resources

Further modifications to the retention schedules will occur through the Council’s RMWG in cooperation with service areas. Due to the functional approach taken, this will ensure consistent retention periods for records series created / captured across service areas. Review is on a rolling basis to ensure there are no gaps caused by lengthy review periods.

The corporate retention schedule was formally approved by the Council in February 2016 and is made available to all staff through the intranet and to the general public through the Council’s website.

Due to the shared resources between the Council and Renfrewshire Licensing Board, the retentions for the Board are included among those for Finance & Resources.

Action Plan:			
	Action	Date	Action by
1	RMWG consultation with service areas to identify record locations against BCS	January – June 2016	Records Manager / RMWG

Evidence:		
1	Renfrewshire Council Retention Schedule	Appendix 10
2	CMT Minutes Approving Retention Schedule	Appendix 11

Element 6: Destructions Arrangements

Renfrewshire Council and Renfrewshire Licensing Board both have access to an external confidential waste company for the secure disposal of paper records. There are also in-house shredders placed throughout Council buildings. Guidance on the destruction and disposal of records is available to all staff on the Council’s intranet, [Renfo](#).

The contract in place for the bulk destruction of paper records is with Paper Shredding Services Ltd (<http://www.onsiteshredding.info/>). Paper files are held securely onsite until they are uplifted by the company.

The Council also uses Restructa (<http://www.restructa.co.uk>) for the secure disposal of IT equipment and any information still contained on it. As in the case with paper records, equipment is held securely in Council buildings until the company collects it for disposal.

Members of the Council's RMWG have a responsibility to ensure appropriate methods are in place for the secure disposal of records, highlighting any areas of concern within their area to the group.

Council employees are required to use Destruction Certificates to record what records have been disposed, when they have been disposed and the method. A copy of the Disposal Certificate must be returned to the Records Manager. That message will be continually communicated to staff through the RMWG membership.

The Records Manager is currently working with individual services and ICT to develop processes and procedures for the disposal of electronic records contained within line of business applications. Not all systems have an automated delete function or retention module. Therefore, work is being undertaken to develop disposal procedures for each system.

Renfrewshire Licensing Board also follows the same procedures. Its equipment is managed by the Council's ICT service and therefore all disposals are in line with the Council's as outlined above.

Action Plan:			
	Action	Date	Action by
1	Development of disposal procedures for line of business applications.	January – December 2016	Records Manager / ICT
2	Review of Disposal Guidelines	January 2018	Records Manager

Evidence:		
1	Disposal Guidelines	Appendix 12
2	Sample Destruction Certificate	Appendix 13
3	Contract Award Letter to Paper Shredding Services Ltd.	Appendix 14
4	Sample Disposal Certificate ICT Equipment	Appendix 15

Element 7: Archiving and Transfer Arrangements

Renfrewshire Council has a historic archives collection at the Heritage Centre within Paisley Central Library. Paisley Central Library is operated by Renfrewshire Leisure, which is a charitable trust set up by the Council to provide sport, leisure and cultural opportunities on behalf of Renfrewshire Council for its community. This includes the management of assets such as Town Halls, Libraries, Museums and Paisley Arts Centre along with Sports Development, Active Schools functions and playing fields.

At the Heritage Centre there are facilities for the preservation of physical historical records and for public access to these special collections. Selection of records for transfer to the archives is detailed within the Council's Records Management Policy and specific series are noted within the records retention schedules. The Council's RMWG, which is chaired by the Records Manager, will decide what records should be retained permanently. The Heritage Officer at

Paisley Central Library, who oversees the Heritage Centre, is also a member of the working group.

Transfer of records from Renfrewshire Council is done using Council staff and vehicles.

Due to the close working relationship between the Council and Renfrewshire Licensing Board, the Board will also be able to utilise the Heritage Centre for the permanent preservation of the records it selects.

Action Plan:			
	Action	Date	Action by
1	Develop more detailed guidance on selection and transfer of records to archives.	March – June 2016	Records Manager / RMWG

Evidence:		
1	Renfrewshire Council and Renfrewshire Leisure Limited Collections Agreement	Appendix 16
2	RMWG Terms of Reference	Appendix 8

Element 8: Information Security

Information Security is an integral part of the Council's Information Governance Strategy and Framework. Policies, procedures and guidance are designed to ensure that all Council staff are aware of their own personal responsibility to handle data securely.

There are procedures in place to ensure that every individual within the Council understands their responsibilities in ensuring the security of information. For example, it is mandatory for all Council employees to complete a mandatory iLearn module on Information Security and all users must read the ICT Acceptable Use Policy before gaining access to systems. The Council's Information Governance Development Officer delivers a specific Information Security training programme Council-wide, on a monthly basis and the Information Governance team issues regular updates on the dedicated Information Governance section of the Council intranet, whilst the SIRO issues regular all user emails, containing key information security messages.

The Council has a dedicated Information Security group, chaired by the Council's Chief Auditor. The remit of the Information Security Group is to ensure that information security is appropriate, proportionate, measured and embedded into business as usual. Membership of this group includes appropriate representation from ICT, the Information Governance Team and Internal Audit.

The Council's Information Governance team have also run a 'Think Twice' campaign since May 2014 specifically to target information security issues. Given that the most catastrophic data breaches can occur due to basic human error, the 'Think Twice' campaign focuses on the individual employee's responsibility to take appropriate action when handling personal data. The principle is that if employees have the mentality to 'stop and think' before, for example,

pressing send on an email, there is less risk of a lapse in concentration or an unintentional data incident occurring. This is aimed to be a simple, easy to understand programme to enforce the required personal responsibility and frame of mind before action.

As part of the wider Information Governance Action Plan, the Information Governance team work closely with the Council's Communications team to maintain a high-profile for information security matters throughout the Council and run an annual Information Governance Awareness Week each autumn.

The Council also has Public Service Network Accreditation and is PCI Compliant. Both demonstrate that robust measures are in place to secure our network infrastructure.

Renfrewshire Licensing Board benefits from its close association with Renfrewshire Council on matters of shared resources, availability of training and issue awareness. It therefore inherits the same standards of information security as the Council

Action Plan:			
	Action	Date	Action by
1	Review ICT Acceptable Use Policy	August 2016	IG Team
2	Review Information Security Policy	November 2016	IG Team
3	Review Clear Desk Guidelines	June 2017	IG Team

Evidence:		
1	Information Security Policy	Appendix 17
2	Information Security Group TOR	Appendix 18
3	Clear Desk Guidelines	Appendix 19
4	PSN Compliance Certificate	Appendix 20
5	PCI Compliance Certificate	Appendix 21
6	Information Security Mandatory iLearn Module Screen Shot	Appendix 22
7	Information Governance Awareness Week - timetable	Appendix 23
8	ICT Acceptable Use Policy	Appendix 24

Element 9: Data Protection

The Council takes its data protection responsibilities very seriously and has various safeguards in place to help ensure that personal data is handled properly, including clear guidance and training for staff. The Council has a clear information governance framework, policies, procedures, guidance and data protection training and continuous awareness raising throughout the Council. The Council has robust policies and procedures in place to ensure compliance with its requirements under the Data Protection Act 1998, and works hard to effectively identify and control risks to prevent data incidents or breaches of the Act.

In 2012/2013 the Council underwent a consensual audit by the ICO and achieved a 'reasonable' assurance, followed by a 'high' level of assurance at follow-up audit, having

implemented the ICO's recommendations. The Council has since been working to ensure continued data protection compliance and has strengthened its current practices by expanding the Information Governance team responsible for driving the Council's Information Governance agenda.

Roles and responsibilities are clearly articulated in the Council's Information Governance Strategy and Framework and its Data Protection Policy. Each Service within the Council has a data protection officer, who is responsible for data protection compliance within that Service, which includes application of policies and procedures and raising awareness. The role of the departmental officer is to monitor compliance within their department, by passing on advice on training, maintaining the accuracy of their departmental input into the Council's notification and in processing Subject Access Requests which relate to records from their Services.

It is mandatory for all Council employees to complete training modules on Data Protection and Information Security. Records are maintained on employees who have completed the mandatory training and who are, in terms of the Council's Information Governance/Data Protection Learning and Development Strategy, obliged to complete annual refresher training.

The Learning and Development Strategy provides for bespoke, in-depth training and refresher training for departmental data protection officers and their deputies on a two yearly basis. The purpose of this Strategy is to ensure that the learning and development needs of individual groups in relation to data protection and wider information governance are adequately addressed. The Strategy identifies the training needs of Elected Members, Directors and Heads of Service, 3rd and 4th tier managers, employees who have specific requirements and those who require only a general awareness.

Formal training is supplemented by data protection awareness raising via a variety of methods, such as regular communications from the Senior Information Risk Owner (SIRO) to staff, a dedicated Information Governance section on the Council's intranet, which is regularly updated and an annual Information Governance Awareness Week, which runs each autumn.

Renfrewshire Licensing Board again benefits from its close association with Renfrewshire Council on matters of shared resources. It therefore inherits the same standards for data protection matters as the Council. As the Board is a data controller in its own right, it is registered with the ICO. The registration number is given below in the evidence table.

Action Plan:			
	Action	Date	Action by
1	Review Data Protection Policy	August 2016	IG Team
2	Renew Council registration with ICO	November 2015	Records Manager
3	Renew Licensing Board registration with ICO	November 2016	Records Manager

Evidence:		
1	Information Commissioner Registration Number, Renfrewshire Council	Z7198739 – Renfrewshire Council
2	Information Commissioner Registration Number, Renfrewshire Licensing Board	Z7256791 – Renfrewshire Licensing Board
3	ICO Audit – Follow Up Audit Report Executive	Appendix 25

	Summary	
4	Data Protection Policy	Appendix 26
5	Data Protection Guidelines	Appendix 27
6	Sample privacy statement	Appendix 28
7	Data Protection page on website	Data Protection page on website
8	Subject Access Request Application Form	Appendix 29
9	Subject Access Request Guidelines	Appendix 30
10	Social Work Subject Access Request Guidelines	Appendix 31
11	Information Promise	Information Promise on website
12	Style Data Processing Agreement	Appendix 32
13	Information Governance Strategy and Framework	Appendix 33
14	IG Learning and Development Strategy	Appendix 34
15	Data Protection Mandatory iLearn Module Screenshot	Appendix 35

Element 10: Business Continuity & Vital Records

Renfrewshire Council recognises the impact that an emergency can have on the provision of services and the critically important role that information and records serve in the efficient and effective operation those services. The Council's Civil Contingency Service has prepared Renfrewshire Council's Corporate Business Continuity Plan.

There are three levels to business continuity planning within the Council. The first level is the overall business continuity plan for the Council. Next, there are service specific plans for each director's service area and finally there are restoration plans that cover each head of service's remit. Prior to drafting a restoration plan service areas complete a Business Impact Analysis (BIA) that forms a core part of the final restoration plan. The BIA template is the method that information on Vital Records and critical information systems is currently collected.

The Council's Corporate Resiliency Group oversees the work of the Civil Contingencies Service and is chaired by the Director of Community Resources with a representative from each service area. There is a standing agenda item ('Spotlight On...') for each meeting that provides the opportunity to highlight specific points of discussion in relation to business continuity. It is through this forum that the Council's Records Manager will be able to focus specific attention and raise awareness on Vital Records.

As stated under Element 4: Business Classification Scheme, 'vital records' will also be captured and updated through the RMWG's further amendments to the BCS of the Council.

Renfrewshire Licensing Board again benefits from its close association with Renfrewshire Council on matters of shared resources. It therefore inherits the same standards of business continuity as the Council.

Action Plan:			
	Action	Date	Action by
1	RMWG consultation with service areas to	January – June	Records Manager /

	identify record locations against BCS	2016	RMWG
2	Records Manager to brief Corporate Resiliency Group on vital records	By June 2016	Records Manager

Evidence:		
1	Renfrewshire Council Corporate Business Continuity Plan	Appendix 36
2	Business Impact Analysis Template	Appendix 37
3	Service Plan – Main Template	Appendix 38
4	Service Plan – Appendices Template	Appendix 39
5	Service Plan – Restoration Document Template	Appendix 40
6	Sample Service Plan – Finance & Resources	Appendix 41
7	Sample Restoration Plan – ICT	Appendix 42

Element 11: Audit Trail

Arrangements for the Audit Trail of records are dependent on the nature of the record being discussed. In terms of those types there are three high level classifications for records:

- Physical – Any record in paper format or even electronic data held off the network (i.e. pen drive, optical disks etc.)
- Structured data – Line of business application data / records held within databases.
- Unstructured data – Files held on network drives (i.e. PDFs, spreadsheets, etc.)

Physical records (primarily paper) of an operational nature are maintained on site in offices and within storerooms. Movement of these paper records are controlled through various methods of check-out/in deployed within service areas such as Social Work Services and Legal and Democratic Services. The process highlighted under 'Element 4: BCS' whereby the RMWG will consult service areas on aspects of the BCS will also involve identifying the method of audit trails for physical records employed within each service, amending the method if required and / or implementing one if required.

The Corporate Records Store is managed by the Records Manager who requires staff to fill in the CRS – Transfer Template spreadsheet before transferring boxes of records to the storeroom. The contents of the completed template are then added to the database. Likewise for any boxes of records removed.

There are number of line of business applications within the Council that do provide version control and audit trails for both structured data and unstructured data. Such systems include OHMS (Housing), Information@Work (Corporate EDMS), SWIFT (Social Care), and SEEMIS (Education). With the number of systems used for a wide variety of roles, further work is required to baseline the audit trail functionality of each system. This can be done in conjunction with the planned work to develop disposal procedures for those same systems

Unstructured data currently held on shared drives within the Council are not held in a uniformly structured format, and have neither an audit trail nor a limit on the copies or versions of the

same document. Again the work to commence under 'Element 4: Business Continuity' will aim to cover this gap. Further guidance on file naming conventions, version control, and audit trails will be developed through the RMWG and be communicated to staff through the Council's intranet and planned Records Management iLearn module (see Element 12).

Action Plan:			
	Action	Date	Action by
1	RMWG consultation with service areas to identify record locations against BCS	January – June 2016	Records Manager / RMWG
2	Baseline Audit Trail functionality of line of business applications during development of disposal procedures	January – December 2016	Records Manager / ICT
3	Develop guidance on file naming conventions, version control and audit trails	January – March 2016	Records Manager / RMWG

Evidence:		
1	CRS – Transfer & Removals Template v0.1	Appendix 43
2	CRS Database Extract	Appendix 44
3	Extract from Information@Work Audit Trail	Appendix 45

Element 12: Competency framework for Records Management Staff

Renfrewshire Council recognises that it must possess a competency framework for the knowledge and skills expected not only of its Records Manager, but also any other staff it employs who have specific responsibilities with regards to Information and Records Management. A role description has already been provided for the Records Manager under Element 2 and the Council's Records Management Policy provides further information on responsibilities.

All staff within Renfrewshire Council must complete mandatory online training on Information Security Awareness and Data Protection. In addition to the mandatory online training modules, there is a Freedom of Information training module available to all staff. The Information Governance pages on the Council's Intranet site, 'Renfo' also provide advice and guidance on information and records management, as well as related policies and procedures.

Further to this, a new Records Management training module is being developed to join the other Information Governance related modules already available. It will aid in raising fundamental awareness of what an individual's responsibilities are with regards to Records Management. It will also be used to further communicate to staff what other sources of guidance there are in relation to records management.

Members of the RMWG are also available for the provision of advice and support to their respective service areas.

Successful Records Management within the organisation is truly everyone's responsibility and it is seen as critical that individual's are aware of the role they play. Renfrewshire Licensing Board is administered by Renfrewshire Council employees, who have the same access to support and training initiatives.

Action Plan:			
	Action	Date	Action by
1	Develop and implement Records Management online training module	January – June 2016	Records Manager / RMWG

Evidence:		
1	IG Learning and Development Strategy	Appendix 34
2	Job Outline for Records Manager Post	Appendix 3

Element 13: Assessment and Review

The RMP, like any other Council policy or initiative, is subject to the Council's standard governance, monitoring and review process.

The Chief Auditor is considering the RMP for inclusion in next year's timetable of internal audits and compliance with the PRSA is an item on the Council's Risk Register. The Records Manager will also submit, on behalf of the Director of Finance & Resources, an annual report on implementation of the RMP and general compliance with the PRSA to the Council's Audit, Scrutiny, and Petitions Board. Further to formal audits, the RMWG will regularly review and assess the plan and it's appropriateness for the members' service areas.

Renfrewshire Council and Renfrewshire Licensing Board recognise that their combined RMP must remain a relevant active document that will guide improvement to Records Management over the next five years. Therefore delegated authority to approve amendments to the Record Management Plan will lie with the officers noted under 'Element 1: Senior Management Responsibility' for their respective parts. This only affects the RMP itself and does not change the current approval process for any document used as evidence.

Action Plan:			
	Action	Date	Action by
1	Creation of review and assessment protocol for use by RMWG	June – August 2016	Records Manager / RMWG
2	First Annual Report to Audit, Scrutiny and Petitions Board	March 2017	Records Manager

Evidence:		
1	RMWG Terms of Reference	Appendix 8

2	Letter from Council's Chief Auditor	Appendix 46
3	Council's Risk Register 2015 Mid-Year Progress Report – 11 November 2015	Link to Board Report – Item 12, Pg 30

Element 14: Shared Information

Renfrewshire Council shares information where required or where appropriate to do so. Information is only shared where it is fair and lawful to do so. Individuals are notified on how the Council will use or share their information via Privacy Notices when information is collected, and also via the Council's website.

The Data Protection training materials specifically cover the ICO Guidance on information sharing with third parties and the Council has a Data Sharing Code, modelled on the ICO Code. This covers both one off and systematic data sharing exercises.

When sharing information with relevant partners, the Council puts Data Sharing Agreements in place to ensure the information is shared fairly, legally and securely. The Council also has a standard style of Data Sharing Agreement which is enclosed for reference. A central repository is maintained of Data Sharing Agreements and Data Processing Agreements.

Action Plan:			
	Action	Date	Action by
1	Review Data Sharing Code	May 2018	IG Team

Evidence:		
1	Data Sharing Code	Appendix 47
2	Style Information Sharing Agreement	Appendix 48
3	Privacy Notice on website	Council's Privacy Notice

Element 15: Freedom of Information

Renfrewshire Council acknowledges that along with the PRSA and Data Protection Act 1998, the Freedom of Information (Scotland) Act 2002 (FOISA) forms three pillars of Information Governance legislation. Good Records Management enables compliance and ensures accurate and consistent responses are released to enquiries. Likewise, complying with FOISA continually demonstrates the benefit of good Records Management to a public authority. Therefore, Freedom of Information has been included as 'Element 15'.

In 2015 Renfrewshire Council received 1,192 requests under the Freedom of Information (Scotland) Act 2002.

In addition to requests for information to Renfrewshire Council, the Records Manager also oversees requests received by Renfrewshire Licensing Board.

Action Plan:			
	Action	Date	Action by
1	Renew Renfrewshire Council Publication Scheme	May 2017	Records Manager
2	Renew Renfrewshire Licensing Board Publication Scheme	May 2017	Records Manager
3	Review FOI Policy	May 2017	IG Team
4	Review FOI Manual	October 2017	IG Team

Evidence:		
1	Freedom of Information Policy	Appendix 49
2	Freedom of Information Manual	Appendix 50
3	Renfrewshire Council Freedom of Information web page and Publication Scheme	Renfrewshire Council Publication Scheme
4	Renfrewshire Licensing Board Publication Scheme	Renfrewshire Licensing Board Publication Scheme

Element 16: Contracts

Renfrewshire Council and Renfrewshire Licensing board both acknowledge that “public records” are defined by the PRSA as:

- records created by or on behalf of a public authority in carrying out its functions;
- records created by or on behalf of a contractor in carrying out the authority’s functions; and
- records created by any other person that have come into the possession of the authority or a contractor in carrying out the authority’s functions.

Therefore, both organisations are duty bound to ensure that appropriate records management procedures are in place in those situations.

As previously stated under ‘Element 7: Archiving and transfer arrangements,’ Renfrewshire Leisure is a charitable trust set up by the Council to provide sport, leisure and cultural opportunities on behalf of Renfrewshire Council for its community. Renfrewshire Leisure’s Chief Executive has agreed to assist the Council to comply with the PRSA in relation to the public records created while performing the functions the Council has passed to it.

The Council intends to use, where appropriate, the style wording from the Scottish Council on Archives for inclusion in future PQQs (pre-qualification questionnaires), ITTs (invitations to tender) and contract conditions in instances where functions of the Council have been delegated to a third party. The Information Governance Team is already consulted as part of the Council’s procurement process on matters of information sharing, information security, and data protection. Therefore, inclusion of the style wording can fit in the process that already exists.

Renfrewshire Licensing Board will follow the Council’s example should the situation arise.

Action Plan:			
	Action	Date	Action by
1	Progress inclusion of style wording into the Council's procurement process.	May 2016	IG Team

Evidence:		
1	Letter from Chief Executive of Renfrewshire Leisure	Appendix 51
2	Scottish Council on Archives - ARMS: Records Management Draft Clauses for Contractors	Link to document

Approvals and Submission

Approval	Date
Renfrewshire Council's Corporate Management Team to formally approve the RMP	12 January 2016
RMP to be passed to Full Council for approval	25 February 2016
RMP to be passed to Renfrewshire Licensing Board	March 2016
Submission to the Keeper of the Records of Scotland	31 March 2016

Actions Table

ACTION PLAN (Chronological)			
Element	Action	Date	Action By
6	Development of disposal procedures for line of business applications.	January – December 2016	Records Manager / ICT
11	Baseline Audit Trail functionality of line of business applications during development of disposal procedures	January – December 2016	Records Manager / ICT
11	Develop guidance on file naming conventions and version control	January – March 2016	Records Manager / RMWG
12	Develop and implement Records Management online training module	January – June 2016	Records Manager / RMWG
4, 5, 10, 11	RMWG consultation with service areas to identify record locations against BCS	January – June 2016	Records Manager / RMWG
4	Soft market testing for EDRMS, minimum EDRMS requirements gathering, and review of current EDMS	February – August 2016	ICT / Records Manager
7	Develop more detailed guidance on selection and transfer of records to archives.	March – June 2016	Records Manager / RMWG
16	Progress inclusion of style wording into the Council's procurement process.	May 2016	IG Team
10	Records Manager to brief Corporate Resiliency Group	By June 2016	Records Manager
13	Creation of review and assessment protocol for use by RMWG	June – August 2016	Records Manager / RMWG
4	Develop targeted plan based on consultation	July 2016	Records Manager / RMWG
4	BCS Implementation Phase	August 2016 – July 2019	RMWG / Service Areas
8	Review ICT Acceptable Use Policy	August 2016	IG Team
8	Review Information Security Policy	November 2016	IG Team
9	Renew Council registration with ICO	November 2016	Records Manager
9	Renew Licensing Board registration with ICO	November 2016	Records Manager
13	First Annual Report to Audit, Scrutiny and Petitions Board	May 2017	Records Manager
15	Renew Renfrewshire Council Publication Scheme	May 2017	Records Manager

15	Renew Renfrewshire Licensing Board Publication Scheme	May 2017	Records Manager
15	Review FOI Policy	May 2017	IG Team
8	Review Clear Desk Guidelines	June 2017	IG Team
15	Review FOI Manual	October 2017	IG Team
6	Review of Disposal Guidelines	January 2018	Records Manager
14	Review Data Sharing Code	May 2018	IG Team
3	Review Records Management Policy	November 2018	Records Manager

Table of Evidence

Evidence:		
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1	Letter from Sandra Black, Chief Executive confirming roles.	1, 2
2	Letter from Clerk of Licensing Board confirming roles.	1, 2
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4	Records Management Policy	3
5	Business Classification Scheme	4
6	Terms of Reference for IMGG	4
7	IMGG Minutes for 3 September 2015 Meeting	4
8	Terms of Reference for RMWG	4, 7, 13
9	RMWG Minutes for 1 December 2015 Meeting	4
10	Renfrewshire Council Retention Schedule	5
11	Council Minutes Approving Retention Schedule	5
12	Disposal Guidelines	6
13	Sample Destruction Certificate	6
14	Contract Award Letter to Paper Shredding Services Ltd.	6
15	Sample Disposal Certificate ICT Equipment	6
16	Renfrewshire Council and Renfrewshire Leisure Limited Collections Agreement	7
17	Information Security Policy	8
18	Information Security Group TOR	8
19	Clear Desk Guidelines	8
20	PSN Compliance Certificate	8
21	PCI Compliance Certificate	8
22	Information Security Mandatory iLearn Module Screen Shot	8
23	Information Governance Awareness Week Timetable	8
24	ICT Acceptable Use Policy	8
	Information Commissioner Registration Number, Renfrewshire Council - Z7198739 – Renfrewshire Council	9
	Information Commissioner Registration Number, Renfrewshire Licensing Board - Z7256791 – Renfrewshire Licensing Board	9
25	ICO Audit – Executive Summary	9
26	Data Protection Policy	9
27	Data Protection Guidelines	9
28	Sample privacy statement	9
	Data Protection page on website	9
29	Subject Access Request Application Form	9
30	Subject Access Request Guidelines	9
31	Social Work Subject Access Request Guidelines	9
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32	Style Data Processing Agreement	9
33	Information Governance Strategy and Framework	9
34	IG Learning and Development Strategy	9, 12
35	Data Protection Mandatory iLearn Module Screenshot	9

36	Renfrewshire Council Corporate Business Continuity Plan	10
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38	Service Plan – Main Template	10
39	Service Plan – Appendices Template	10
40	Service Plan – Restoration Document Template	10
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43	CRS – Transfer & Removals Template v0.1	11
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46	Letter from Council’s Chief Auditor	13
	Council’s Risk Register 2015 Mid-Year Progress Report – 11 November 2015 - Link to Board Report – Item 12, Pg 30	13
47	Data Sharing Code	14
48	Style Information Sharing Agreement	14
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50	Freedom of Information Manual	15
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	Renfrewshire Licensing Board Publication Scheme - Renfrewshire Licensing Board Publication Scheme	15
51	Letter from Chief Executive of Renfrewshire Leisure	16
	ARMS: Records Management Clauses for Contractors	16