

West Lothian Council

Records

Management Plan

2019

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Status Description:

Draft - These are documents for review and liable to significant change.

Final - The document is complete and is not expected to change significantly. All changes will be listed in the change record table.

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1. Overview

1.1. Background

The Public Records (Scotland) Act 2011 (hereafter referred to as 'the Act') came fully into force in January 2013. The Act obliges West Lothian Council and other public authorities to prepare and implement a records management plan (RMP). The RMP sets out proper arrangements for the management of records within the council. The plan is agreed with the Keeper of the Records of Scotland (the Keeper) and reviewed by the council on an annual basis.

The West Lothian Council Records Management Plan is based on the Keeper's published Model Records Plan. The model plan has 14 Elements.

The 14 Elements are:

1. [Senior management responsibility](#)
2. [Records manager responsibility](#)
3. [Records management policy statement](#)
4. [Business classification](#)
5. [Retention schedules](#)
6. [Destruction arrangements](#)
7. [Archiving and transfer arrangements](#)
8. [Information security](#)
9. [Data protection](#)
10. [Business continuity and vital records](#)
11. [Audit trail](#)
12. [Competency framework for records management staff](#)
13. [Assessment and review](#)
14. [Shared information](#)

West Lothian Council has provided the Keeper with evidence of policies, procedures, guidance and operational activity on all elements of the plan.

The plan was initially agreed with the Keeper 09 July 2013 and subsequently re-assessed and approved on 30 April 2018. It will be reviewed annually.

The West Lothian Council RMP relates to records throughout their lifecycle, from creation and acquisition to archive and destruction. It encompasses all records across all council service areas. The plan also incorporates records held by West Lothian Licensing Board and West Lothian Schools. The plan excludes Joint Boards who, under the Act are required to submit individual RMPs.

For more information about the Public Records (Scotland) Act 2011, visit the website of the National Records of Scotland:

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

A copy of the Act can be viewed online:

<http://www.legislation.gov.uk/asp/2011/12/part/1/enacted>

1.2. Records management in West Lothian Council

The records of West Lothian Council constitute an auditable account of the authority's activities, which provides evidence of the business, actions, decisions and resulting policies formed by the council.

Records represent a vital asset, which support the daily functions of the council and protect the interests and rights of staff, and members of the public, who have dealings with the council. Effective record keeping supports efficiency, consistency and continuity of work and enables the council to deliver a wide range of sustainable services. It ensures that the correct information is: captured, stored, maintained, retrieved and destroyed or preserved in accordance with business need, statutory and legislative requirements.

Records management is an essential part of enabling the council to achieve priority outcomes that reflect what is most important to the people and communities of West Lothian as set out in the council's [Corporate Plan 2018/19 to 2022/23](#). West Lothian Council maintains an overarching [Information Governance Policy](#) records management procedures and practices across all its service areas. These are based upon the requirements of the Public Records (Scotland) Act 2011, records management best practice and the principles detailed below.

1.3. Records management principles

The following principles drive activities relating to effective information governance within West Lothian Council:

- Information is a **valuable asset** and is managed as such;
- Information governance is the **responsibility** of all who handle or manage council information;
- Information is acquired, created, maintained, shared and disposed of in **accordance with legislation, regulations, guidance, standards and best practice**;
- Information governance recognises and respects the rights of data subjects;
- Information is appropriately secured and protected;
- Information is **shared** and **not duplicated**;
- Information is **stored within approved systems** not in personal filing;
- Information is **accessible** and **preserved** for as long as required;
- Staff are **trained** in information governance procedures;
- Risks are identified and mitigated;
- Information governance supports the council values of making best use of resources and being honest, open and accountable.
- Councillors have **awareness, oversight**, the opportunity and ability to **scrutinise** information governance and regulatory compliance;

1.4. Records covered by this plan

In line with the Act, **all** records created in the carrying out of the council's functions (whether directly or by third parties) are public records. Part 1, section 3.1 of the Act states that:

“... “public records”, in relation to an authority, means—

- (a) records created by or on behalf of the authority in carrying out its functions,*
- (b) records created by or on behalf of a contractor in carrying out the authority's functions,*
- (c) 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.”*

1.5. Records Management systems in the council

West Lothian Council uses three main types of records management systems:

- Manual Filing Systems (where it is necessary to keep paper and other physical records);
- IT applications and databases (that process records for specific functions e.g. HR, Purchasing, Housing Management etc.);
- Corporate Electronic Documents and Records Management System (EDRMs).

All records management systems are subject to the [Information Governance Policy](#) and associated records management procedures, guidelines and elements of this plan.

2. Elements of the Plan

2.1. Element 1: Senior Management Responsibility

Senior Management responsibility for the Records Management Plan lies with **Julie Whitelaw, Head of Corporate Services**. For enquiries relating to the Records Management Plan please contact:

The Customer Service Centre
West Lothian Council
West Lothian Civic Centre
Howden South Road
Livingston
West Lothian EH54 6FF
Tel: 01506 280000
Email: customer.service@westlothian.gov.uk

2.2. Element 2: Operational Records Management Responsibility

The point of contact for the operation of records management within the council is **Carol Dunn, Records Manager**. For enquiries relating to the operational aspects of Records Management please contact:

The Customer Service Centre
West Lothian Council
West Lothian Civic Centre
Howden South Road
Livingston
West Lothian EH54 6FF
Tel: 01506 280000
Email: customer.service@westlothian.gov.uk

2.3. Element 3: Records Management Policy Statement

West Lothian Council's commitment to effective records management is set out in the corporate [Information Governance Policy](#) and in the councils [Improvement Strategy](#). These are subject to ongoing monitoring and review.

Online guidelines and procedures are available to all staff e.g. Data Labelling, Email Management, File Naming Conventions, and Scanning etc. This is supported by online training and local experts within each service area.

West Lothian Council has implemented an Electronic Content Management System (ECM) as a central corporate repository. The ECM is compliant with the European MoReq2010 standard for the collection of information within records management systems. Read more about MoReq2 at <https://www.moreq.info/>.

2.4. Element 4: Business Classification

West Lothian Council have adapted the Local Government Functional Classification Scheme (LGFCS) as a basis to its business classification scheme. The LGFCS is developed in a structure that supports the business activities of the authority. The LGFCS hierarchy is structured in three tiers:

- Level 1: functions
- Level 2: activities
- Level 3: transactions

West Lothian Council have expanded upon this to include further levels (levels 4-6) detailing sub-groupings of records types and years. The deployment of ECM in the council has required that file plans are developed to accommodate strict security models, whilst facilitating information sharing, and the application of retention scheduling.

'Information Liaison Officers', 'Local Records Officers' and 'Objective Leads' are defined roles that manage and maintain local file plans for their service areas.

The LGFCS was developed by the Information & Records Management Society. Details of the LGFCS can be viewed on their website: <http://www.irms.org.uk/>

2.5. Element 5: Retention Schedules

West Lothian Council have adapted the Scottish Council for Archives Records Retention Schedule (SCARRS) model as the basis to the councils approved retention schedules. These retention schedules are endorsed by each Head of Service (as appropriate) and applied to both electronic records and paper records.

More information on SCARRS can be found on the Scottish Archives website: <http://www.scottisharchives.org.uk/scarrs>

In addition, West Lothian Council have implemented paper records inventories and detailed the retention schedule requirements for each record set aligned to (approved) retention schedules.

West Lothian Council Archives service provides a centralised resource for long-term storage of both operational records (non-current) and preservation of historical records. This resource manages the retention and disposal of these records and works with services to identify records for archival, preservation or destruction.

Standards for records retention are built into contracts and agreements with third parties who share or process information on the council's behalf.

2.6. Element 6: Destruction Arrangements

West Lothian Council have contracts in place for the bulk destruction of paper records and IT equipment containing electronic records.

Haven Products Ltd - Provides a confidential shredding service for paper records
Company website: <https://havenrecycle.co.uk/>

CCL North Ltd – Provides a secure hardware destruction service (to UK Government standards). Company website: <http://www.cclnorth.com/secure-data-destruction.html>

In addition, West Lothian Council uses on site paper/CD/DVD shredders which ensure that paper and optical media is destroyed to European security standards (2 x 15 mm particles).

Standards for records destruction arrangements are built into contracts and agreements with third parties who handle or process records on the council's behalf.

2.7. Element 7: Archiving and Transfer Arrangements

West Lothian Council operate an in-house archive facility that provides services for the preservation of both historical and long-term operational records. Archiving and transfer arrangements are detailed within policies, procedures and guidelines and within approved records retention schedules.

More information on the Archives service is available on the council's website:
<http://www.westlothian.gov.uk/article/2052/Archives>

Archive arrangements are also included in the [Information Governance Policy](#).

2.8. Element 8: Information Security

The council operates an Information Security Management System (ISMS) in accordance with the international standard ISO27001. The council's [Information Governance Policy](#) and Information Security Guidance comply with this standard and provide a framework for all services.

All staff receive information security awareness training and are reminded of the importance of security. Procedures and processes such as the Information Security Guidance are in place to deal with threats, risks and breaches of security.

Compliance with security requirements is assessed and reviewed as per the governance model described in Element 13.

More information on ISO27001 can be found on the British Standards Institute website.
<http://www.bsigroup.co.uk/en-GB/iso-27001-information-security/>

2.9. Element 9: Data Protection

In order to deliver services to the various communities in West Lothian, West Lothian Council requires gathering and processing personal data about residents, staff and other individuals. Data Protection law regulates the processing of personal data by West Lothian Council. Data Protection law gives individuals the right to be advised of and receive copies of any personal data relating to them which is held by West Lothian Council.

Data Protection law is enforced and promoted by the Information Commissioner's Office. The ICO provide guidance and advice on complying with the terms of the law and investigate complaints regarding possible breaches of the obligations contained within the law.

The Information Commissioner maintains a register of fee payers listing all Data Controllers in the UK. Every organisation that processes personal information are required to pay a fee to the ICO, unless they are exempt. West Lothian's registration can be viewed on the Information Commissioner's Office website, www.ico.gov.uk, registration number **Z6925127**.

Data Protection law sets out data protection principles which must be complied with when the council is processing personal data. The principles require that personal data is:

- processed lawfully, fairly, and in a transparent manner;
- collected for specified, explicit and legitimate purposes;
- adequate, relevant and limited to only what is necessary;
- accurate and, where necessary, kept up to date;
- kept for no longer than is necessary;
- processed in a manner that ensures appropriate security, including protection against accidental loss, destruction or damage, using appropriate technical or organisational measures.

The Head of Corporate Services is the Council's Data Protection officer and has responsibility for monitoring data protection compliance throughout the council. Each Head of Service has nominated an Information Liaison Officer who is responsible for providing routine advice on Data Protection to the Head of Service and other officers within the service and for co-ordinating responses to Subject Access Requests made to that service. The Information Liaison Officer will also act as the service representative on the Council's Information Management Working Group, which is chaired by the Data Protection Officer.

The council has an [Information Governance Policy](#) to ensure that the council complies with the requirements of Data Protection law. The Policy will be regularly reviewed by the Data Protection Officer and Information Management Working Group. In addition, the council has developed General Guidelines for officers to ensure compliance with the responsibilities of the council when processing personal data and also policies and procedures for the use of mobile electronic devices, the use of council e-mail and internet systems, the application of passwords to electronic information, the disposal of IT hardware.

The Council will enter into a Data Processing Agreement where a third party requires to be provided with personal data to allow it to deliver a service on behalf of the council. The Council will also ensure that Information Sharing Protocols are entered into when the council is proposing to share personal data in circumstances which are permitted in terms of the data protection principles.

All council officers are required to undertake data protection and information security training to ensure that personal data is processed in accordance with the data protection principles.

2.10.Element 10: Business Continuity and Vital Records

West Lothian Council have identified their vital records through the business classification schemes (file plans) and paper inventories of each service.

This feeds the Business Continuity and Disaster Recovery planning process for each service area.

2.11.Element 11: Audit Trail

The council's ECM provides electronic audit trails as evidence of viewing, modifying, and deletion of records.

IT systems and databases provide audit logs that record usage and updates to records.

Paper records of an operational nature are maintained on site and identified within the paper records inventories. Movement of these paper records is controlled through a method of check-out/in deployed within each service area.

In addition, archiving procedures ensure that paper records are tracked from local storage to long term archive/preservation.

2.12.Element 12: Competency framework for Records Mgt Staff

West Lothian Council employ staff that have specific responsibilities for Information Management, Records Management and Information Security. Role descriptions are available for the IT Security Architect, Records Manager, Archivist and Records Manager(s), Information Liaison Officers, Local Records Officers and Objective Leads.

All staff within West Lothian Council must complete mandatory online training in Information Security Awareness, Data Protection, Freedom of Information and Records Management. Access to council systems is revoked for staff who do not complete this training.

Local training modules have been put in place for service areas who routinely deal with more sensitive personal and/or confidential information.

Regular communications ensure that staff remain aware of records management requirements and best practice.

2.13. Element 13: Assessment and Review

The Records Management Plan and [Information Governance Policy](#) are subject to the council's standard governance, monitoring and review process. The plan is formally audited and reviewed on an annual basis.

Formal governance over this plan is set out in the table below.

Governance		
Group	Governance/Scrutiny Role	Reporting Frequency
Information Management Working Group	Developing and implementing policies and procedures relating to the plan and monitoring/reporting progress across service areas	8 Weekly
Governance and Risk Board	Reviewing and implementing policies, procedures and standards. Monitoring performance relating to this plan	Quarterly
Partnership and Resources Policy Development and Scrutiny Panel	Scrutinise and review the plan and supporting strategies, policies and progress	Annual (where required)
Council Executive	Approval of the plan and associated strategies and policies	Annual (where required)

All service areas are required to monitor, self audit and report on performance on an ongoing basis. Service level plans are put in place for the continued development and improvement of records management practice in each area.

2.14. Element 14: Shared Information

West Lothian Council identify all instances of information sharing between service areas and where information is shared with or processed by a third party. This is governed by the council's [Data Sharing Code of Practice](#) and in agreements with third parties such as Data Sharing Agreements, Data Processing Agreements and Data Processing Information Handling Standards.