



**Dumfries and Galloway Council
Dumfries and Galloway Licensing Board
Assessor & Electoral Registration Officer
South West of Scotland Transport Partnership**

Records Management Plan

Setting out proper arrangements for the management of records under the
Public Records (Scotland) Act 2011

Document Control

Title	Dumfries and Galloway Council Records Management Plan
Prepared By	Records and Information Management Officer
Status	Final
Approved By	The Keeper of the Records of Scotland
Date of Approval	12 February 2019
Review Frequency	Annually
Next Review Date	20 September 2019

Version Control

Version	Date	Summary of changes	Name
V0.1	14 January 2014	Draft	Judex Paul
V1.0	22 August 2014	Approved by the Keeper	Judex Paul
V2.0	1 September 2015	Revised – change to senior management responsibility and operational responsibility	Gillian McNish, Records & Information Management Officer (R&IMO)
V2.1	3 August 2017	Major changes to format and content to reflect progress	Lindsay Turpie, R&IMO
V2.2	11 August 2017	Consulted/updated – Element 7: Archiving and Transfer Arrangements	Graham Roberts, Council Archivist
V2.3	18 August 2017	Consulted/updated – Element 10: Business Continuity	Martin Ogilvie, Resilience & Community Safety Manager
V2.4	24 August 2017	Consulted/updated – Element 14: Shared Information	Rhona Lewis, Head of Legal & Democratic Services
V2.5	28 August 2017	Update to Audit Trail	Lindsay Turpie, R&IMO
V3.0	14 September 2017	Approved at Committee	Lindsay Turpie, R&IMO
V3.1	09 February 2018	Update to progress of procurement of third party add-on software – Element 4 & Element 11	Lindsay Turpie, R&IMO
V3.2	23 July 2018	Updated in line with Keeper's Interim Report	Lindsay Turpie, R&IMO
V4.0	12 February 2019	Approved and published	Lindsay Turpie, R&IMO

Approvals

Business Management Group	29 August 2017
Policy and Resources Committee	14 September 2017
The Keeper of the Records of Scotland	12 February 2019

Contents

1.	Authorities Covered by the Plan	3
2.	Introduction	3
3.	Elements of the Plan	4
Element 1:	Senior Management Responsibility	4
Element 2:	Records Manager Responsibility	5
Element 3:	Records Management Policy Statement	6
Element 4:	Business Classification	7
Element 5:	Retention Schedules	8
Element 6:	Destruction Arrangements	9
Element 7:	Archiving and Transfer Arrangements	10
Element 8:	Information Security	11
Element 9:	Data Protection	12
Element 10:	Business Continuity and Vital Records	13
Element 11	Audit Trail	14
Element 12:	Competency Framework for Records Management Staff	15
Element 13:	Assessment and Review	17
Element 14:	Shared Information	18
Annex A	Evidence Submitted	19

1. Authorities Covered by the Plan

This Records Management Plan (**RMP**) incorporates the approach to managing records held by Dumfries and Galloway Council, Dumfries and Galloway Licensing Boards, the Assessor and Electoral Registration Officer for Dumfries and Galloway and the South West of Scotland Transport Partnership. Therefore, for the purposes of this Plan, where the word ‘Council’ is used it covers all departments and services within the authorities named below:

- **Dumfries and Galloway Council**
- **Dumfries and Galloway Licensing Boards**
- **Assessor & Electoral Registration Officer for Dumfries and Galloway**
- **South West of Scotland Transport Partnership**

2. Introduction

The Public Records (Scotland) Act 2011 (**‘the Act’**) came fully into force in January 2013. The Act requires Scottish public authorities to prepare and implement a RMP setting out proper arrangements for the management of their records. The RMP is agreed with the Keeper of the Records of Scotland (**‘the Keeper’**) and reviewed by the Council on an annual basis.

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.”*

This RMP sets out the overarching framework for records management within the Council, based on the 14 elements of the Keeper’s Model Plan. The RMP has been prepared in consultation with colleagues from across the Council. The Council has provided the Keeper with evidence of policies, procedures, guidance and operational activity in support of all elements of the RMP.

Records are one of the Council’s most vital assets. They support decision-making, document activities, provide evidence of policies, decisions and transactions, and underpin the daily work of the Council.

This RMP covers all records, regardless of medium or format, which are created, received and managed by the Council and its staff during the course of business.

The Council currently uses three main types of records management systems:

- IT applications and databases that process records for specific functions (e.g. Human Resources, Social Work, Finance etc.)
- Electronic Document and Records Management System (**EDRMS**) (SharePoint)
- Manual Filing Systems (where it is necessary to keep paper and other physical records)

All records management systems are subject to this RMP along with all supporting policy, procedures and guidelines.

3. Elements of the Plan

Element 1: Senior Management Responsibility

Introduction

Element 1 of the RMP is a mandatory element that requires the Council to identify a person at senior level who has overall strategic responsibility for records management. The RMP must provide the name and job title of the person who accepts overall responsibility for the RMP.

Statement of Compliance

Senior Management responsibility for records management within the authorities covered by the RMP lies with:

Lorna Meahan
Director of Corporate Services
Dumfries and Galloway Council
Council Offices
English Street
Dumfries
DG1 2DD

Evidence of Compliance

- Item 001: Letter from the Director of Corporate Services of Dumfries and Galloway Council
- Item 002: Records Management Policy

Future Developments

There are no planned future developments in respect of this element.

Assessment and Review

This element will be reviewed in line with any relevant changes in personnel.

Element 2: Records Manager Responsibility

Introduction

Element 2 of the RMP is a mandatory element that requires the Council to identify an individual within the authority, answerable to senior management, to have day-to-day operational responsibility for records management within the authority. The RMP must provide the name and job title of the person responsible for the day-to-day implementation of the RMP.

Statement of Compliance

The individual answerable to senior management and who has day-to-day operational responsibility for records management and the implementation of the RMP within the authorities covered by the RMP is:

Lindsay Turpie
Records and Information Management Officer
Dumfries and Galloway Council
Business and Technology Solutions
Monreith House
Crichton Business Park
Dumfries
DG1 4ZZ

Evidence of Compliance

- Item 001: Letter from the Director of Corporate Services of Dumfries and Galloway Council
- Item 002: Records Management Policy
- Item 003: Records & Information Management Officer - Job Description and Person Specification
- Item 039: Letter from Clerk to the Licensing Boards
- Item 040: Letter from Assessor and Electoral Registration Officer

Future Developments

There are no planned future developments in respect of this element.

Assessment and Review

This element will be reviewed in line with any relevant changes in personnel.

Element 3: Records Management Policy Statement

Introduction

Element 3 of the RMP is a mandatory element that requires the Council to include a records management policy statement that demonstrates the importance of managing records and underpins the effective management of the Council's records and information.

Statement of Compliance

The Council is committed to establishing and maintaining good record keeping practices which meet business needs, comply with legal, statutory and regulatory obligations and demonstrate transparency and accountability to all its stakeholders.

The Council's commitment to establishing and maintaining effective records management is set out in the Records Management Policy. This policy provides an overarching framework for all other records management policies, procedures and guidelines produced by the Council. This policy alongside all other records management policies and supporting guidance are published within the Records Management Toolbox and available to all staff.

This policy covers all records, regardless of medium or format, which are created, received and managed by the Council and its staff during the course of business.

Evidence of Compliance

- Item 001: Letter from the Director of Corporate Services of Dumfries and Galloway Council
- Item 002: Records Management Policy

Future Developments

There are no planned future developments in respect of this element.

Assessment and Review

This policy will be reviewed annually and additionally as required to ensure that it remains up-to-date, takes account of any new or changed legal requirements, best practice and business needs.

Element 4: Business Classification

Introduction

Element 4 covers business classification. A business classification scheme describes what business activities the authority undertakes – whether alone or in partnership. Under this element the Keeper expects the Council to have properly considered its business functions and reflect these within a business classification scheme.

Statement of Compliance

The Council has developed a Business Classification Scheme covering all business functions, activities and transactions. The scheme was reviewed and approved by the Business Management Group. The Business Classification Scheme is published within the Records Management Toolbox and is available to all staff.

The Business Classification Scheme is generally not implemented throughout the Council's shared drives. However, the Business Classification Scheme is integral to the design and move to the implementation of SharePoint, with additional third-party records management functionality (RecordPoint), as an EDRMS.

Evidence of Compliance

- Item 004: Business Classification Scheme
- Item 005: Business Classification Scheme Policy
- Item 041: Pentana (Corporate Reporting System) Screen prints

Future Developments

The Council is currently undertaking a project to implement SharePoint with RecordPoint as its EDRMS. The Council's Business Classification Scheme will form the basis of the design and implementation of the EDRMS, enhancing the ability to group, store, secure and destroy records in accordance with the agreed business classification scheme, policy and retention. The SharePoint infrastructure has been built and finalised on live servers and RecordPoint software has been successfully installed and configured. Work is underway to pilot the EDRMS ahead of rolling out throughout Council services.

Assessment and Review

The Council's Business Classification Scheme is a living document and is subject to ongoing monitoring and review to ensure that it reflects the needs of the Council and that all the functions, activities and transactions continue to be represented within it.

Element 5: Retention Schedules

Introduction

Element 5 covers retention schedules. A retention schedule is a list of records for which pre-determined disposal dates have been established. A retention schedule is an important tool for proper records management. Under this element the Council must demonstrate the existence of and adherence to corporate records retention procedures.

Statement of Compliance

The Council's Record Retention Schedule forms an essential part of its overall records management, ensuring that records are kept for no longer than is necessary and disposed of as appropriate. They help establish and inform staff on the types of records we need to keep, how long records are required and what should be done with them at the end of that period.

The Record Retention Schedule has been arranged by the functions of the Council, rather than by service area or department. The schedules were comprehensively reviewed, standardised and formally published in 2016 as part of the Records Management Improvement Programme. The schedules were developed and reviewed in line with best practice from the Scottish Council on Archives Record Retention Schedules, relevant legislation and in conjunction with expertise from individual services and the Council Archivist.

The schedules are published within the Records Management Toolbox and available to all staff. A Record Retention Schedule eLearning module has been developed to support staff in the use of the schedules and significant communication and engagement has been undertaken throughout service areas to promote and support the implementation of the schedules. The Council's office rationalisation programme and move towards Smarter Working is acting as an added driver for services to review and apply retention to their records.

Evidence of Compliance

- Item 006: Record Retention Schedules (sample)
- Item 007: Record Retention Schedule Policy
- Item 008: Records Retention Schedule eLearning screen print
- Item 041: Pentana (Corporate Reporting System) Screen prints

Future Developments

The implementation of SharePoint along with RecordPoint as an EDRMS will allow the Council to better apply retention periods to unstructured data, making it easier to assign disposal dates and subsequently dispose of records securely and at the appropriate time. As part of the roll out of the EDRMS, shared drives will be phased out, moving all unstructured data to the SharePoint platform. In preparation for the transition to the EDRMS, work is underway to encourage staff to review the information they have stored in email, on shared drives and within the current SharePoint system, in line with the retention schedules.

Assessment and Review

The Council's Record Retention Schedules are subject to ongoing monitoring, review and improvement. Ongoing work will be undertaken, in consultation with individual services and the Council Archivist, to ensure that the Record Retention Schedule remains up-to-date, accurate and fit for purpose.

Element 6: Destruction Arrangements

Introduction

Element 6 is a mandatory element and covers destruction arrangements. Section 1(2)(b)(iii) of the Act requires a RMP to include provision about the archiving and destruction, or other disposal, of an authority's public records and to demonstrate that proper destruction arrangements are in place.

Statement of Compliance

The Council recognises that destruction of redundant information is an important part of records management. Proper destruction arrangements ensure that the Council retains records only for as long as necessary and destroys them securely and appropriately. Destruction of records is done in line with the Council's Destruction Arrangements Policy and Record Retention Schedules to ensure that records, regardless of medium or format, are destroyed consistently and appropriately. This policy and the related Record Retention Schedules are published within the Records Management Toolbox and available to all staff.

The Council currently uses two suppliers to carry out the destruction of records:

- Restore DataShred - Provide confidential waste bags which are collected on an ad-hoc basis following the raising of a purchase order.
- Shred-it Limited - Provide an on-site shredding facility with a lorry which attends on a monthly or fortnightly basis.

Both companies offer an alternative solution of secure boxes held on site with a regular collection and materials taken for secure destruction.

Destruction of IT hardware and software, is carried out by an external supplier, CCL (North) Ltd. This was originally a joint agreement with Falkirk Council; however, this joint agreement has been reduced to a sole agreement with Dumfries and Galloway Council.

Evidence of Compliance

- Item 009: Records Destruction Arrangements Policy
- Item 006: Record Retention Schedules (sample)
- Item 010: Sample Destruction Certificate for Disposal of Paper Records
- Item 044: Sample Destruction Certificate for Disposal of Hardware
- Item 045: Back-ups
- Item 046: Record Destruction Log Screen print

Future Developments

Work has been undertaken with colleagues in Procurement to review Confidential Waste Contracts, with a view to having a single corporate supplier to ensure an agreed common standard and to secure a supplier which offers best value to the Council.

Assessment and Review

The Records Destruction Arrangements Policy and related retention schedules are subject to ongoing monitoring and annual review to ensure that they remain up-to-date and take account of any new or changed legal requirements, best practice and business needs.

Element 7: Archiving and Transfer Arrangements

Introduction

Element 7 is a mandatory element and covers archiving and transfer arrangements. Section 1(2)(b)(iii) of the Act requires a RMP to include provision about the archiving and destruction, or other disposal, of an authority's public records and to detail its archiving and transfer arrangements to ensure that records of enduring value are deposited in an appropriate archive repository.

Statement of Compliance

The Council operates an in-house archive service that provides facilities for preservation of historical records. The archive service for Nithsdale was established in 1986, and from 1996 became a regional service for Dumfries and Galloway Council. An archivist and an archives assistant care for and make accessible to the public the Council Archive from the Ewart Library, Catherine Street, Dumfries. The Council Archivist is Graham Roberts. Bimonthly meetings take place between the Records and Information Management Officer and Council Archivist to review progress in this area and plan for any future improvements.

The Records Archiving and Transfer Arrangements Policy outlines the process for transferring all records which have reached the end of their specified retention period and need to be archived, as per instructions in the Record Retention Schedules, for long-term preservation. These arrangements aim to select and preserve records of the Council that bear on the history or administration of the region. Both the policy and related schedules have been developed in conjunction with expertise from the Council Archivist.

Evidence of Compliance

- Item 011: Records Archiving and Transfer Arrangements Policy
- Item 006: Record Retention Schedules (sample)
- Item 056: Communication - Did you know...we have an Archive Service

Future Developments

The Council does not currently have a detailed Digital Preservation Strategy in place. However, this will be developed, in line with best practice, as part of future service improvements. Services are asked to take steps, where possible, to assist in the preservation of digital records until such time as they can be transferred to proper digital archival management and storage.

Assessment and Review

The policy is subject to ongoing monitoring and annual review, by the Records and Information Management Officer and Council Archivist, to ensure that it remains up-to-date, takes account of any new or changed legal requirements, best practice and business needs.

Element 8: Information Security

Introduction

Element 8 covers information security and requires the Council to make provisions for the proper level of security for its public records. The Council must evidence that there are robust policies and procedures in place to protect its records.

Statement of Compliance

Securing information assets, and in particular records, helps to fulfil legislative responsibilities, safeguard the Council's reputation, ensure business continuity, optimise the management of risk and minimise the impact of security incidents.

The security of all Council records and information is managed in accordance with the Council's Records Management Procedures and Standards, Acceptable Use Policy and Security Classification Scheme. These documents assist staff in ensuring the security and integrity of information.

All Council staff and Elected Members are responsible for complying with the Council's agreed policies and procedures to keep information safe and secure.

As part of the induction process, all staff are required to undertake mandatory information security awareness and Data Protection training. The Council's First Impressions eLearning module has a dedicated section on 'Keeping Information Secure', which includes advice and guidance on: identification and access to buildings, using computer systems, managing your username and password, storing information safely and the legislative drivers (Data Protection and Freedom of Information). The module provides links to relevant policy documents. Ongoing communication and engagement is undertaken to ensure staff are reminded of the importance of information security.

Procedures and processes are in place to deal with threats, risks and breaches of security.

Evidence of Compliance

- Item 012: Records Management Procedures and Standards
- Item 013: Acceptable Use Policy
- Item 014: Security Classification Scheme
- Item 015: Keeping Information Secure eLearning screen print
- Item 037: Information Security at Work Poster

Future Developments

A number of initiatives are under way to further enhance the Council's ability to ensure records remain secure, appropriately categorised, classified and stored. From a Technology Services perspective, these are focussed on technical controls and monitoring of the data that is stored and transmitted. This will be achieved through the increased use of technologies such as Cloud infrastructure, enhanced email and communications security, improved storage and back up and enhanced end user device controls. In addition, compliance with Government initiatives such as Cyber security essentials and Public Service Networks (PSN) will continue to be maintained.

Assessment and Review

These policies are subject to ongoing monitoring and annual review to ensure that they remain up-to-date, take account of any new or changed legal requirements, best practice and business needs.

Element 9: Data Protection

Introduction

Element 9 covers Data Protection and requires the Council to provide evidence of compliance with legal obligations to protect personal information under the Data Protection Act 1998. (Note element 9 relates to the Data Protection Act 1998 and needs to be updated to reflect new Data Protection Act 2018).

Statement of Compliance

The Council fully endorsed and adhered to the principles of the Data Protection Act 1998 and is continually working towards absolute compliance of the Data Protection Act 2018 including the need to keep pace with technological change and addressing the benefits and challenges this can bring to the collection and use of personal data.

The Council has an approved Data Protection Policy in place to ensure that all personal data processing, carried out on its behalf complies with the legislative requirements. The Data Protection Policy is published on the Council's intranet and is available to all staff.

All staff are required to undertake mandatory eLearning modules on the GDPR awareness and in Data Protection.

We hold an information asset register to identify what personal data we hold, where it came from, why we hold it, how much and for how long and what we use it for. Checklists and new procedures for use by officers and elected members are available on all data protection activities.

As a Data Controller, Dumfries and Galloway Council is registered as such with the Information Commissioner's Office (ICO). The Council's Registration can be viewed on the ICO website.

The Data Protection section of the Council's external website advises the public of their rights under the Act and how they can access information held about them.

Evidence of Compliance

- Item 016: Data Protection Policy
- Item 017: Data Protection eLearning screen print
- Item 047: Data Protection SharePoint screen print
- Item 048: GDPR Data Protection eLearning screen print
- Item 049: General Data Protection Regulation Brochure

Future Developments

Work is currently ongoing updating the corporate risk register to reflect the changes and risks of the GDPR. Officers, together with legal representation, are currently supporting the development of data sharing agreements and overseeing the embedding of the new GDPR arrangements

Assessment and Review

All data protection activities and training are subject to ongoing monitoring and annual review, to ensure that they remain up-to-date, take account of any new or changed legal requirements, best practice and meet business needs.

Element 10: Business Continuity and Vital Records

Introduction

Element 10 covers business continuity and vital records. Certain records held by authorities are vital to their function. The Keeper expects the Council to indicate arrangements in support of records vital to business continuity.

Statement of Compliance

The Council's Information Asset Register details the information assets held by each service area. It defines information that is held and provides details on the management of that information. This provides a single view of the Council's information holdings. It also provides details on the high-level risk profile of the information assets, enabling prioritisation of resources to make information management improvements and minimise the likelihood and impact of risk occurring.

Each key service area is also required to have a Business Continuity Plan in place which sets out actions to be taken to recover the critical activities and/or assets following an incident. These are termed 'Corporate Critical Activities' and a log of the functions and timescales for return to operation is held by the Resilience and Community Safety service. The Director of the Communities directorate has strategic oversight of this unit. Template Business Continuity Plans are available and professional expert trainers were procured previously to assist Business Managers and supervisors prepare Business Continuity Plans.

The Council's IT team is responsible for maintaining the back-up and retrieval of electronic records held on Council IT systems. Electronic data is backed up daily via Policy schedules setup within the backup software. There are currently 5 different Policy schedules which allow the spread of the backup process across intervals in the evening out with business hours. The backup software is configured to manage pre-defined rules on how many versions of files to keep, for how long and where it is stored.

Evidence of Compliance

- Item 018: Information Asset Register Extracts
- Item 019: Business and Technology Solutions Service Business Continuity Plan
- Item 042: Record Store Procedures
- Item 043: Record Store Transfer List
- Item 045: Back-ups

Future Developments

Following the recent completion of corporate refocusing, the next step will be for Services to refresh their Business Impact Analysis. This self-assessment will benchmark their functions against agreed criteria. The Information Asset Register is currently being thoroughly reviewed as part of the GDPR Preparation Project.

Assessment and Review

The Information Asset Register is regularly reviewed to ensure that it accurately reflects the information assets held by the Council. Services are expected to periodically review and update their Business Continuity Plan to ensure they are maintained and fit for purpose.

Element 11: Audit Trail

Introduction

Element 11 covers audit trail. An audit trail is a sequence of steps documenting the movement and/or editing of a record resulting from activities by individuals, systems or other entities. The Keeper expects the Council to provide evidence that it maintains a complete and accurate representation of all changes that occur in relation to a particular record.

Statement of Compliance

Council services responsible for handling particularly sensitive information use line-of-business systems capable of monitoring the movement and amending of these records. Examples include Social Work (MOSAIC), Finance (Integra), Human Resources/Payroll (iTrent) and Education (SEEMIS).

Within the current SharePoint 2010 infrastructure there is capability to produce reports on document usage, including: creation, update, deletion and a log on which documents are opened and by whom.

The Council is going to use SharePoint along with RecordPoint as an EDRMS to manage its unstructured information. This will help services to track the use of records and define access rights. SharePoint will also make it easier for users to find the information they need. Through the roll out of the EDRMS, the use of shared drives will be phased out and the Council.

Historical paper files held at the Social Work record store are catalogued in a database that includes such details as file box number and shelf number along with details of the service user to whom the file relates. On receipt of a request to borrow files from the store, a procedure is followed to trace when a file is removed and returned to ensure that the location of the file is always known.

Paper records held at our Corporate Record Store are managed within RecordPoint. Barcode labels have been applied to all boxes within the store. This gives the ability to track the location and any movement of the boxes/records. This audit trail is not destroyed when the box/record is; allowing retrieval of the metadata and audit information for any records that have been destroyed.

Evidence of Compliance

- Item 020: Audit Trail Capabilities – iTrent
- Item 021: Audit Trail Capabilities – MOSAIC
- Item 022: Audit Trail Capabilities – Integra
- Item 023: Record Store File Movement Form
- Item 041: Pentana (Corporate Reporting System) Screen prints
- Item 050: Audit Trail Capabilities – SharePoint 2016 EDRMS (including RecordPoint)

Future Developments

The implementation of SharePoint and RecordPoint as an EDRMS will facilitate robust audit, version control, and tracking and retrieval facilities for records. The SharePoint infrastructure has been built and finalised on live servers and the RecordPoint software has been successfully installed and configured. Work is underway to pilot the EDRMS ahead of rolling out throughout Council services.

Assessment and Review

Progress on the implementation of the EDRMS will be closely monitored and reviewed and the Keeper will be kept informed.

Element 12: Competency Framework for Records Management Staff

Introduction

Element 12 covers a competency framework for Records Management staff. The Keeper expects the Council's RMP to detail a competency framework for person(s) designated as responsible for the day-to-day operation of activities described in the elements in the authority's RMP.

Statement of Compliance

The Council recognises the importance of having a dedicated Records and Information Management Officer - with specific skills, as outlined within the job description and person specification - to take forward the implementation of the RMP. The Council's Records and Information Officer is named as having operational responsibility for this RMP. The Records and Information Management Officer regularly attends events and conferences related to records management for continuing professional development and to keep up-to-date with industry best practice.

The Council's Records Management Policy includes objectives to improve staff understanding and knowledge of records management with information and training readily available. The Council has developed a mandatory eLearning awareness module for Records Management, which all staff must complete. Staff uptake of the course is monitored via user progress reports. These are reported to the Business Management Group, who ensure uptake within their directorate.

As part of the Records Management Improvement Programme, in November 2016, all documentation, policy, procedure and guidance related to records management was reviewed, standardised and published within the Records Management Toolbox, which is held within a SharePoint site and available to all staff. This was launched to provide staff with one single source of information for records management. The Director of Corporate Services, who has senior management responsibility for records management, sent out an email to all Council mail users to launch the Toolbox and provide staff with guidance on managing information. Significant communication and engagement has been undertaken to promote the Toolbox and the resources within it. Communications on records management are sent out to all Council mail users on a regular basis under the 'Smarter Working for You' banner. Guidance and awareness posters have been produced and distributed throughout Council buildings.

A network of Records Management Champions has been established from throughout Council Directorates. The Champions role is to promote, support and monitor good record keeping practices within their service area. The Champions group meet with the Records and Information Management Officer – and, when appropriate, other key individuals including the Archivist - on a quarterly basis to discuss progress and receive additional information and guidance on records management and what they should be doing within their area.

The Council has a Lifelong Learning Centre that ensures core skills training is delivered to all staff and Members, whilst individual departments arrange service specific training.

Evidence of Compliance

- Item 003: Records & Information Management Officer - Job Description and Person Specification
- Item 024: Records Management eLearning screen print
- Item 025: Records Management Toolbox screen print
- Item 026: Managing our Information Email
- Item 032: Records Management As Easy As 123 Poster
- Item 033: Records Management Where to Start? Poster
- Item 034: FAQ Records Management
- Item 035: FAQ Retention Scheduling and Archiving
- Item 036: FAQ Email Management
- Item 051: Role of a Records Management Champion

Future Developments

Additional training, guidance and support materials for staff will be developed, as required, and in line with the roll out of SharePoint and RecordPoint as an EDRMS.

Assessment and Review

The competency and training framework is subject to ongoing monitoring and review, by the Records and Information Management Officer, to ensure that it remains fit for purpose and meets the needs of staff.

Element 13: Assessment and Review

Introduction

Element 13 covers assessment and review of the RMP. The Council is required to keep its RMP under review and must describe the procedures in place to undertake this regular review.

Statement of Compliance

The Council is committed to monitoring the effectiveness of the RMP. The RMP and all related policies and procedures are subject to ongoing monitoring and annual review to ensure that they remain up-to-date, take account of any new or changed legal requirements, best practice and business needs.

The Council currently carries out self-assessment based on the JISC infoNet Records Management Maturity Model. Going forward, the newly implemented Progress Update Review self-assessment mechanism will also be utilised to help demonstrate the Council's continuing compliance with s.5(1)(a) of the Public Records (Scotland) Act 2011, to keep RMPs under review and to ensure that the Keeper is informed of progress.

The RMP and related policy are agreed by the Council's Policy and Recourses Committee. Records management is regularly reported through two places – the Business Management Group, as agreed by Senior Leadership Team and the Corporate Services Programme Executive. As a key Council project, progress of the Records Management Programme is also reported through the corporate reporting system, Pentana.

Policy and Resources Committee/Audit, Risk and Scrutiny Committee – Responsible for the consideration and approval of the RMP and associated strategies and policies.

Corporate Services Programme Executive – Responsible for scrutinising progress in the delivery of the agreed Records Management Programme.

Business Management Group - Records management progress is reported to the Business Management Group. Directorate Business Managers are expected to lead on records management for their Directorate and report back.

Information Management Group - Oversees the development of information management and data protection measures and processes within the Council; to assure the quality of relevant processes; to consider information sharing requests and associated protocols; and to ensure learning and action is identified and progressed for all Council services and activities.

Evidence of Compliance

- Item 002: Records Management Policy
- Item 027: Records Management Maturity Level and Action Plan
- Item 038: Summary Report Records Management Maturity February 2018
- Item 041: Pentana (Corporate Reporting System) Screen prints
- Item 052: Membership and Remit of Information Management Group

Future Developments

There are no planned future developments in respect of this element.

Assessment and Review

The RMP along with all related policies and procedures will be reviewed annually and as required to ensure that they remain up-to-date, take account of any new or changed legal requirements, best practice and business needs.

Element 14: Shared Information

Introduction

Element 14 covers shared information. Under certain conditions, information given in confidence may be shared. Most commonly this relates to personal information, but it can also happen with confidential corporate records. The Keeper expects the Council's RMP to reflect its procedures for sharing information.

Statement of Compliance

In certain circumstances the Council identifies all instances of information sharing between service areas and where information is shared with or processed by a third party.

In November 2012 Dumfries and Galloway partner agencies - Council, NHS, Fire and Rescue and Constabulary - agreed, and signed up, to a data sharing framework, the Scottish Accord for the Sharing of Personal Information (SASPI).

The Accord identifies the commitments required by each organisation to enable sharing of personal information. Sign up and ownership are at the highest level in each organisation. The Accord is a statement of the principles and assurances which govern the activity of information sharing. It ensures that the rights of all those who are involved in this process are properly protected.

SASPI has been the framework followed since its adoption, and several Information Sharing Protocols (ISPs) have been created and signed off up to accordance with it. Despite the creation of Police Scotland and Scottish Fire and Rescue Service which followed the adoption of SASPI with local partners, it has continued to be used for local information sharing. The Scottish Government have however issued a revised Information Sharing Framework to replace SASPI and the Council is currently working with public sector partners to adopt the new framework over the coming months. It is intended that ISPs will move over to the new ISP format as and when they are due for review. SASPI has been a valuable tool enabling the Council and its local partners to work to a consistent framework for information sharing. Staff awareness of the importance of appropriate information sharing has increased and SASPI has supported several Council functions to achieve their objectives.

Evidence of Compliance

- Item 028: SASPI ISP for Adult Matching August 2017
- Item 029: SASPI Information Sharing Agreement Health and Social Care Integration March 2017
- Item 014: Security Classification Scheme

Future Developments

The Council will review its arrangements for sharing information in accordance with the new Information Sharing Framework and, to ensure that they are compliant with the GDPR (EU 2016/679), and related UK data protection legislation. All relevant policies and staff guidance will be updated and reviewed as required as part of a GDPR Preparation Plan.

Assessment and Review

The Council looks forward to adopting and implementing the new Information Sharing Framework issued by the Scottish Government, which will serve as an opportunity to review and further improve its information sharing effectiveness in accordance with the GDPR.

ANNEX A: EVIDENCE SUBMITTED

Evidence of Compliance		
Reference	Document Name	Element(s)
Item 001	Letter from the Director of Corporate Services of Dumfries and Galloway Council	1, 2, 3
Item 002	Records Management Policy	1,2, 3, 13
Item 003	Records & Information Management Officer – Job Description and Person Specification	2, 12
Item 004	Business Classification Scheme	4
Item 005	Business Classification Scheme Policy	4
Item 006	Record Retention Schedules (sample) *All 42 schedules available upon request	5, 6, 7
Item 007	Record Retention Schedule Policy	5
Item 008	Records Retention Schedule eLearning screen print	5
Item 009	Records Destruction Arrangements Policy	6
Item 010	Sample Destruction Certificate for Disposal of Paper Records	6
Item 011	Records Archiving and Transfer Arrangements Policy	7
Item 012	Records Management Procedures and Standards	8
Item 013	Acceptable Use Policy	8
Item 014	Security Classification Scheme	8, 14
Item 015	Keeping Information Secure eLearning screen print	8
Item 016	Data Protection Policy	9
Item 017	Data Protection eLearning screen print	9
Item 018	Information Asset Register Extracts	10
Item 019	Business and Technology Solutions Business Continuity Plan	10
Item 020	Audit Trail Capabilities – iTrent	11
Item 021	Audit Trail Capabilities – MOSAIC	11
Item 022	Audit Trail Capabilities – Integra	11
Item 023	Record Store File Movement Form	11
Item 024	Records Management eLearning screen print	12
Item 025	Records Management Toolbox screen print	12
Item 026	Managing our Information Email	12
Item 027	Records Management Maturity Level and Action Plan	13
Item 028	SASPI ISP for Adult Matching August 2017	14
Item 029	SASPI Information Sharing Agreement Health and Social Care Integration March 2017	14
Item 030	Information Management Strategy	
Item 031	Records Management Logo	
Item 032	Records Management As Easy As 123 Poster	12
Item 033	Records Management Where to Start? Poster	12
Item 034	FAQ Records Management	12
Item 035	FAQ Retention Scheduling and Archiving	12
Item 036	FAQ Email Management	12
Item 037	Information Security at Work Poster	8
Item 038	Summary Report Records Management Maturity (February 2018)	13
Item 039	Letter from Clerk to the Licensing Boards	2
Item 040	Letter from Assessor and Electoral Registration Officer	2
Item 041	Pentana (Corporate Reporting System) Screen prints	4, 5, 11, 13
Item 042	Record Store Procedures	6, 10
Item 043	Record Store Transfer List	6, 10
Item 044	Sample Destruction Certificate for Disposal of Hardware	6
Item 045	Back-ups	6
Item 046	Record Destruction Log Screen print	6
Item 047	Data Protection SharePoint screen print	9
Item 048	GDPR Data Protection eLearning screen print	9
Item 049	General Data Protection Regulation Brochure	9
Item 050	Audit Trail Capabilities – SharePoint 2016 EDRMS (including RecordPoint)	11
Item 051	Role of a Records Management Champion	12
Item 052	Membership and Remit of Information Management Group	13
Item 053	Communication - Did You Know...we have a Records Management Toolbox	12
Item 054	Communication - Managing your email effectively	12
Item 055	Communication - Get rid of ROT (redundant obsolete and trivial)	5, 6, 12
Item 056	Communication - Did you know...we have an Archive Service	7, 12
Item 057	Records Management Clauses for Contractors	
Item 058	Records Management Guidelines for Contractors	
Item 059	Contract Variation Template	