



Records Management Policy

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Phone 0303 123 1015 or email equalities@southlanarkshire.gov.uk

Document Control Log

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V3.1	20/09/2021	Revised draft prepared by Lucy Cienkus for IGB comments
V3.2		Changes made to draft V3.1 following IGB comments – replaced Data Protection 2018 with UK GDPR, replaced EDRMS to ECMS, changes to responsible records manager (element 2), removed section 7 EDRMS and other systems by incorporating content into other sections, updated training courses, re-ordered some sections, minor formatting, minor addition to section 9 Alternative formats, updated contacts, fixed broken links to documents.
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Approvals

Version	Date	Group
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1. Introduction

Records are a vital day to day source of information providing evidence on the Council's actions, policies, and decisions. As a corporate asset, the Council recognises that these records must be systematically managed throughout their life-cycle to ensure their proper use for as long as is needed.

The Public Records (Scotland) Act 2011 places an obligation on the Council to prepare and implement a Records Management Plan (RMP), approved by The Keeper, which sets out proper arrangements for the management of records within the Council. The creation of a records management policy is a mandatory element (Element 3) of the RMP and this policy together with associated policies and guidance, provides a framework to enable continuous improvement in the way in which the council manages and uses its records and information.

2. Definition of a record

A record is any information created, received, or used by South Lanarkshire Council, irrespective of format, in connection with its business activities or the conduct of its affairs which is retained as evidence of those activities. Definitions of key terms used in this policy are provided in Appendix 1.

Records can be:

- Word-processed correspondence, minutes of meetings, policies, strategies, case files, spreadsheets, and other documents
- Stored maps, plans, drawings and photographs, analogue or digital
- Email messages
- CCTV footage (including footage from body worn cameras)
- SMS text messages, tweets, and social media entries
- Data/documents generated and stored in electronic systems such as Electronic Content Management Systems (ECM), People Connect or SEEMiS

See appendix 2 for an outline of the characteristics of a managed record.

3. Benefits of records management

Records management is the systematic management of the Council's records from their creation, receipt, maintenance, use and disposal. Systematic management of records allows the council to:

- know what records it has, and locate them easily
- ensure records are up to date, accurate and reliable
- manage records for as long as they are needed
- increase efficiency and effectiveness
- save physical and electronic storage space
- reduce duplication
- support decision-making
- be open, transparent, and accountable
- achieve business objectives and targets
- provide continuity in the event of a disaster by identifying vital records
- demonstrate authenticity, reliability, integrity, and accessibility
- meet legislative and regulatory requirements and apply best practice.
- identify records with long term value that require preservation

Poor and unmanaged records make performance of the Council's duties more difficult, costs time, money and resources, and puts the Council and services users at risk in terms of security breaches, prosecution and loss of good reputation.

4. Purpose and scope

This Records Management Policy forms part of the Council's wider information strategy framework and associated suite of procedures and guidance for the management of records across the council. As set out in our Records Management Plan, they are intended to ensure that Council records are managed efficiently, transparently, and consistently throughout their life cycle from the point they are created or received, through maintenance and use, to the time they are destroyed or permanently preserved as historic archival records.

The purpose of this policy is to:

- provide a corporate approach to records management.
- identify relevant legislation and regulations associated with records management.
- set out specific records management responsibilities within the Council.
- encourage a records management culture where all employees recognise the value and benefits of effective records management

This policy applies to:

- all Council Resources and Services in South Lanarkshire Council.
- all council staff, volunteers, including staff on secondment or work experience placement
- all third parties that manage and process information on the organisation's behalf when supporting the delivery of Council statutory or business functions.
- all records created, received, maintained and used by the Council in the course of carrying out its business activities and it applies to all records regardless of their medium or format.

5. Responsibilities

The Council

In line with its obligations under Section 53 of the Local Government (Scotland) Act 1994, the Code of Practice issued in terms of section 60 of the Freedom of Information (Scotland) Act 2002, the UK General Data Protection Regulations (GDPR), where the information is or contains personal data, and the Public Records (Scotland) Act 2011, the Council, has responsibility for ensuring the proper management of its records. South Lanarkshire Council will create, maintain and manage records which document its decision-making process and business activities. By doing so, the Council will be more able to meet its statutory, regulatory, social and organisational obligations.

Senior Officer responsible for the Council's Records Management Plan

The Executive Director, Finance and Corporate Resources has overall responsibility for the management of records within the Council including management of the Council's Records Management Plan as set out in the Public Records (Scotland) Act. The Executive Director is also the Senior Information Risk Officer (SIRO) for the Council.

Records Management responsibility

The Legal Services Adviser/Information Compliance Manager has overall responsibility for developing and implementing the Records Management Plan (RMP) and is The Keeper's initial point of contact for records management issues. The Legal Services Adviser/Information Compliance Manager is also responsible for managing the Council's Archives and Records Centre.

Information Governance Board

Chaired by Head of Administration and Legal Services, the Information Governance Board, has representation from all Resources, and responsibility for helping drive improvements within information governance principles across the Council. The Information Governance Board recognises that records management is a key component to achieving good information governance practice.

The Information Governance Board has responsibility for the monitoring and review of the Council's Information Strategy, Records Management Plan, Records Management Policy, and the implementation of the vital records programme.

Archives and Information Management Service (AIMS)

The Archives and Information Management Service sits within Administration and Legal Services, Finance and Corporate Resources. This service is responsible for:

- Records management policy and procedures
- Best practice guidance
- Records retention and disposal schedules and policies
- Selection, transfer and long-term preservation of historical records to the Council's Archive
- Management of the Council's Archives and Records Centre

The Archives and Information Management service will have appropriate levels of professional and administrative staff to provide an effective service to South Lanarkshire Council.

IT Services

IT Services has responsibility for managing the Council's network infrastructure, ensuring systems continuity and security, and facilitating the business of the Council by advising on the appropriate tools. The IT Business teams also have responsibility for ensuring that records management arrangements are considered and built into the specification for any new business system.

All Resources

Individual Resources are responsible for the implementation of records management procedures across their Services. Resources must ensure that appropriate employees are designated to implement records management procedures and liaise with the Archives and Information Management Service as needed.

All Council employees

It is the responsibility of every employee to manage the Council's records, a corporate asset, responsibly and in line with records management procedures, including specific arrangements in their service or Resource.

6. Relevant legislation and standards

Records must be managed in accordance with relevant legislation, regulations and existing professional standards. These include the following:

- Local Government (Scotland) Act 1994
- The UK General Data Protection Regulation (UK GDPR)
- Human Rights Act 1998
- Freedom of Information (Scotland) Act 2002
- Environmental Information (Scotland) Regulations 2004
- Public Records (Scotland) Act 2011
- BS ISO 15489 Standard on best practice in records management
- BS 10008:2008 Evidential weight and legal admissibility of electronic information

- Pupils' Educational Records (Scotland) Regulations 2003
- The Re-use of Public Sector Information Regulations 2015
- Information Commissioner's Surveillance camera code of practice
- Other relevant statutory and regulatory obligations covering business functions such as Health and Safety and Finance.

7. Principles and Implementation of good records management

South Lanarkshire Council is committed to the development and implementation of procedures and guidance to facilitate the creation and maintenance of authentic, reliable, and useable records capable of supporting its business activities for as long as they are required.

The guiding principle of records management is to ensure that information is secure and accessible when and where it is needed, in an organised and efficient manner, in accordance with an agreed business classification scheme and in a well-maintained environment.

Procedures will be implemented to ensure the appropriate management of records from their creation or receipt by the Council, through their active use until final disposition – either by transfer to the Council's Record Centre or secure and confidential destruction. A small percentage of our records will be selected for permanent preservation as part of South Lanarkshire Council's Archives, ensuring the maintenance of the corporate history.

These procedures will be based upon the Council's statutory and regulatory requirements, professional standards and best practice.

The Council recognises the Resource requirements to effectively implement records management procedures across its Services and it will ensure that appropriate resources are available across the Council.

The Council will deliver good records management by implementing processes and procedures including but not limited to:

- Development of a corporate file plan for the Council's Enterprise Content Management system (ECM) Objective based on business functions
- Development and implementation of retention and disposal schedules covering all business areas of the Council applicable to all record formats
- Development of vital records plans to assist Resources in recovering records essential to the running of their business in the event of a disaster
- Operating a managed off-site storage facility for the Council's non-current records and archives
- Implementing effective back-up procedures for the maintenance and security of electronic records
- Appropriate management of personal, sensitive or confidential information
- Clearly documented records management requirements to be included from the outset into any new business system specified and provision made for how the records created by the system will be appropriately retained, deleted or preserved for as long as needed in the future
- Clearly documented records management requirements to be included as part of any major change to IT systems and business processes
- New systems intended for the processing of personal and sensitive personal data must have a privacy impact assessment carried out at the conception stage of the project. This assessment will include the consideration and implementation of proper retention and destruction policies/procedures for the personal data involved.
- Ensuring employees receive appropriate training to carry out their responsibilities

- Publishing information governance policies, procedures, and guidance on the intranet for all council staff to access.

8. Digital continuity and preservation

Digital continuity is the ability to maintain the digital information of a creator in such a way that the information will continue to be available, as needed, despite changes in digital technology. It focuses on making sure that information is complete, available, and usable for business needs.

Information is usable if it can be:

- found when needed
- accessed when needed
- worked with it in the way required
- understood in terms of what it is and what it is about
- trusted that it is what it says it is

Managing digital continuity protects the information needed to do business. This enables the council to operate accountably, legally, effectively, and efficiently. It helps the council protect its reputation, make informed decisions, reduce costs, and deliver better public services. If information is lost because digital continuity has not been managed properly, the consequences can be as serious as those of any other information loss.

Resources should be aware of the risks associated with digital records and that, as technology advances, appropriate action must be taken in liaison with IT Services, to ensure that electronic records that are required to be retained long term are migrated, updated, protected or preserved as appropriate so that they remain authentic, trustworthy, accessible, and useable for as long as is needed.

9. Alternative record formats

Consideration should be given to records created using electronic mail, SMS text messaging, social media and CCTV footage (including body worn cameras). These records are subject to the same regulations as other formats of records and therefore should be captured, retained, and managed appropriately in corporate systems.

This applies not only to records created using council computers and council issued mobile devices but also to official business conducted from private email accounts and private mobile phones or devices. All official Council records must be captured and retained in official systems. An example of this might be an instruction sent by text to a member of staff to carry out a specific duty. To capture this record, an officer might type up a file note on return to the office and save it to the shared drive or the council's content management system or a case management system.

Social media, such as Twitter and Facebook, as well as messaging services such as Microsoft Teams Chat, should also be considered if used for council business and appropriate procedures introduced to capture official council records into corporate systems. An example of records created through Twitter might be responses to complaints received or the publishing of road reports.

The Council recognises that this is a new and evolving area and separate guidance regarding this topic will be issued to assist Council employees. A separate social media policy has been approved by the Council.

10. Public Records created or held by third parties

One of the requirements of the Public Records (Scotland) Act 2011 is that when a public authority is contracting out a function to a private or voluntary organisation, the contracting authority is responsible for ensuring that the records created as part of that contract are managed in an appropriate manner. This means that the Council must have procedures in place to ensure that the private or voluntary organisation is looking after our records appropriately.

This will be achieved by:

- Adding the requirement (where applicable) to the Pre-Qualifying Questionnaire in the tendering process and asking organisations to advise how they will manage the records created in the process of carrying out the function
- Where appropriate, developing procedures to monitor and assess whether organisations are adhering to this requirement.
- Particular arrangements put in place where personal data is being “processed” by the contractor on behalf of the Council even if the “processing” is merely storage of the information without the contracting out of a function. This refers to when the council uses an external server or the cloud to hold the information for us.
- Provision of a Council Procurement and Data Protection toolkit that contains the contractual provisions and monitoring arrangements by the Council that must be put in place.

11. Training

The Council recognises the importance of records management and information management more widely. A suite of core Learn On Line courses is available to help employees carry out their information management duties and encourage a culture where records management is understood and valued.

Learn On Line Courses

Cyber security – stay safe online
Data Sharing 2018
Document verification
Email and Online Risk
How Data Protection applies to the Council
Identifying a request for information
Introduction to the Data Protection - 2018
Information management and me
Information Governance – an introduction
Information Security
Processing a request for information
Records Management
Subject Access Requests 2018

12. Monitoring and review

This policy will be reviewed by the Information Governance Board when required or, at the minimum, at least every 5 years. The Information Governance Board will regularly monitor compliance with the policy's procedures and guidelines making any amendments and improvements as necessary. The Information Governance Board will report on progress to the Corporate Management Team.

Resources must monitor and review their own arrangements that have been put in place in order to comply with this policy on a similar regular basis.

13. Associated Council policies and guidance

This policy forms part of a suite of Council policies and guidance that relate to records management. These are all available on the intranet and Resources should refer and adhere to these alongside this Records Management Policy.

- [Information Strategy](#)
- [Records Management Plan](#)
- [Information Security Policy](#)
- [IT Acceptable Use Policy](#)
- [Information Requests Compliance Policy](#)
- [Data Protection policy](#)
- [Employee Code of Conduct](#)
- [Corporate Standards Policy](#)
- [Confidential waste guidance](#)
- [Retention and Disposal Policy](#)
- [Collection, Transfer and Archiving Policy](#)
- [Social Media policy](#)
- [Vital records guidance](#)

14. Contacts

Further information on records management and the council's procedures, is available on the [records management pages](#) of the intranet or contact the Archives and Information Management Service:

Manager: Bill Dunn, Legal Services Adviser
Phone: 01698 45 4564
Email: bill.dunn@southlanarkshire.gov.uk

Record Centre:
Email: recordcentre@southlanarkshire.gov.uk

You can also contact your [Information Governance Board representative](#) for further information.

Definition of Key Terms

Appendix 1

Archives

Records which have administrative, evidential, or historical and cultural value over a sustained period of time.

File Plan

A file plan lists the records in your service and describes how they are organised and maintained.

Objective ECM (Enterprise Content Management)

Objective ECM (Enterprise Content Management) is an electronic document and records management system. It is a software application designed to facilitate the creation, management, use, storage and disposal of a range of both physical and digital documents and records in an integrated way. Objective ECM can also automate business processes such as workflows and approvals and be integrated with other business systems.

Personal data

This has a particular meaning under the UK GDPR but, in summary, it is information that relates to a living, identifiable (not necessarily by name) individual. Relating to an individual includes being used by the Council to make decisions about the individual or recorded by the Council to tell it something about the individual.

Record

Recorded information created, received, or used by South Lanarkshire Council in connection with its business activities or the conduct of its affairs which is retained as evidence of those activities. Records can be held in any format.

Records Management

The field of management responsible for the efficient and systematic control of the creation, receipt, maintenance, use and disposal of records.

Record Retention Schedule

This is a document drawn up by a service in consultation with the Archives and Information Management Service which sets out all the different sets of records created by the service in conducting its business. It outlines how long each type of record should be retained in the office, stored at the Records Centre and its eventual fate or destruction date.

Vital Records

Vital records are those without which the Council could not continue to operate in the event of a disruption or disaster. They are records which are required to carry out core functions in a legally compliant manner, they contain information needed to re-establish/continue the business of the Council in the event of a disaster, they protect the Council's assets and interests, protect employees, customers and stakeholders, and the Council's reputation

Characteristics of a managed record

Appendix 2

South Lanarkshire Council must ensure that its records are:

Adequate

Records must be full enough to meet the purposes for which they are being held. The use of information that is not adequate for its purpose may not be possible or be detrimental to its use in some other way.

Authentic

Records are reliable - that they represent the information that was used in the business process. It must be possible to prove that the records are what they purport to be and who created them with audit trails.

Accurate and reliable

Our reputation is maintained through the full and accurate record of the Council's activities. Records must reflect the business that the Council carries out. Records must be created close to the time of the transaction /activity and created by individuals with direct knowledge of the instruments involved in the transaction /activity.

Accessible and useable

Records can be readily accessed by those with appropriate authority when required. The context can be established through links to other records in the transaction /activity.

Complete and integral

Records must be sufficient in content, context, and structure to reconstruct the relevant activities and transactions. The records must be complete and unaltered and protected against unauthorised alteration. An audit trail can be followed to identify alterations after creation and persons making the changes.

Comprehensive

Records can be interpreted with ease, providing information about the business activity to which they relate and pointing to other related records.

Compliant

Records must comply with any record keeping requirements arising from legislation and other statutory obligations.

Effective

Records maintain their qualities of accessibility, interpretation and reliability for as long as the record is maintained and be kept for as long as they are required to support business activities and to act as an audit trail of the decisions and transactions of the Council.

Not excessive

There is little point in collecting/creating information that is excessive for the purpose to which it is intended. Excessive information could confuse or delay the thinking process of the Council and, where the information is personal data, could be detrimental to any individuals concerned if lost or inappropriately disclosed to someone else.

Secure

Records are protected and kept secure in a manner appropriate to their value and content.