

Records Management Policy Update

Date of meeting 11 December 2020

Date of report 30 November 2020

Report by Assistant Chief Executive

1. Object of report

To recommend the Partnership approves a revised Records Management Policy.

2. Background

As a public sector organisation, SPT is subject to the Public Records Act (Scotland) 2011. This requires SPT to produce and maintain a Records Management Plan and have this approved by the Keeper of the Records for Scotland. A key element of the Plan is the requirement to maintain a Records Management Policy and provide for regular reviews of the policy.

The current Policy was last reviewed and approved by the Partnership in 2016. Since this time work has been undertaken to assess SPT's information management practices in line with best practice, as well as the introduction of additional requirements relating to Data Protection and GDPR.

Summary of changes

The proposed changes to the policy are not substantial but do incorporate the principles of good records management and legislative compliance.

Specific changes are:

- Changes in layout to reduce white space;
- Updates to reflect current internal structures (e.g. now referring to Information Governance Steering Group) and job titles;
- Simplified language;
- Update to reflect current legislation (e.g. Data Protection Act 2018);
- Update to method of disposal of hard copy records (required for PCI DSS Compliance);
- Update to reflect new agreement with Glasgow City Archives in relation to storage of permanent records (required under Public Records Act (Scotland) 2011); and
- Inclusion of a formal review period of 3 years.

3. Conclusion

It is considered good practice to keep the Records Management Plan refreshed and consistent as organisations change over time. The addition of a fixed review period of three years meets one of the specific requirements from the Keeper of Records, namely being able to demonstrate a process for regular review and update to policy. The Updated Plan is attached at Appendix 1.

4. Partnership action

The Partnership is recommended to approve the revised Records Management Policy and note that this will be appended to the evidence pack submitted to the Keeper of Records in due course.

5. Consequences

Policy consequences	<i>Revised Records Management Policy.</i>
Legal consequences	<i>Compliance with Public Records (Scotland) Act 2011.</i>
Financial consequences	<i>None directly.</i>
Personnel consequences	<i>None directly.</i>
Equalities consequences	<i>None directly.</i>
Risk consequences	<i>None directly.</i>

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Strathclyde Partnership for Transport Records Management Policy

DRAFT

Action	Date	Version	Owner	Review by
Approved	03/05/2013	1.0	VD	
Updated	07/10/20	1.01	VD	MT; Information Governance Group
Approved				

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1. Introduction

Records management is the systematic control of an organisation's records throughout their life cycle in order to meet operational business needs and legal requirements. Records can be in several formats, e.g. paper, electronic or digital media. The records lifecycle includes creation, receipt, maintenance, use, distribution, storage and disposal of records. It allows reliable access to records, ensures timely destruction of redundant information, and the identification and protection of vital and historically important records.

2. Aim of the Policy

Strathclyde Partnership for Transport (SPT) is committed to good records management as part of wider Information Governance activity, and the aim of the Policy is to define and provide a framework for managing our records and establish accountabilities to ensure that we:

- create and capture authentic and reliable records to demonstrate evidence, accountability and information about our decisions and activities
- maintain securely and preserve access to those records as long as they are required
- safely destroy records as soon as they are no longer required
- meet legal record-keeping requirements
- identify and preserve records deemed worthy of permanent preservation
- protect vital records, which are required in order to function effectively.

3. Scope of Policy

The policy applies to all SPT members, employees, agents, consultants and contractors, who create, collect, hold, use or dispose of SPT information.

4. Legislation and Related Documentation

Legislation such as the Data Protection Act 2018, the Freedom of Information (Scotland) Act 2002, and the Public Records (Scotland) Act 2011 set out specific requirements in relation to the creation and management of all records, in all formats.

Our records retention schedules and records management plan are publically available. Guidance is available for staff on the Intranet.

5. Responsibilities

Senior Management

The Assistant Chief Executive has overall strategic responsibility for Records Management and will monitor compliance and delegate day-to-day oversight of records management functions. Directors are responsible for ensuring that their business areas comply with this policy and related procedures/ guidance. Directors will signoff annual records disposal activity.

Information Governance Group

The Group will receive reports on records management and contribute to policy and practice development. Members of the Group will help to embed a standardised approach across SPT and be Champions for good records management within their business areas.

Information Governance Officer

The Information Governance Officer will have day-to-day operational responsibility for records management and will act as subject matter expert, providing advice and support across SPT.

Managers

Managers are responsible for ensuring that their teams are aware of and comply with this policy and related procedures/ guidance, and that teams attend training where identified.

Employees

All employees who receive, create, maintain and/ or delete records are responsible for understanding and practicing good records management in line with this policy and the relevant guidelines and procedures.

Digital

Digital are responsible for ensuring that access rights to network folders/ records are well managed to limit unauthorised access to information. Digital are responsible for ensuring regular backups of SPT network folders.

6. Information Asset Register (IAR)

A Corporate IAR has been established and information asset owners assigned. This will be regularly reviewed and updated as necessary.

7. Creating and Storing Records

Records will be created in accordance with the SPT Business Classification Scheme and stored on network folders in the agreed structure. SPT information should not be saved on personal devices or on laptop desktops to ensure that records are able to be backed up regularly.

Hard copy records will be stored in secure filing cabinets and in accordance with the Business Classification Scheme. SPT is working towards reducing the amount of hard copy data held. Certain vital records are held in fireproof safes and access to these is limited.

Each business area should hold information detailing records held and their location. This will inform regular updating of the IAR and support regular disposal activity.

Records are also held within various systems and security measures are in place to limit access to these (e.g. passwords).

Records will be stored in line with the Records Retention Schedule and reviewed at least annually to identify records to be disposed of.

8. Disposal of Records

Records may be disposed of in various ways dependant on the nature of the record.

Hard-copy materials: crosscut shredded, incinerated, or pulped so that they cannot be reconstructed. Secure waste disposal bins are provided within SPT and shredding is managed by an external organisation, with proof of destruction provided.

Electronic: upon annual review against the records retention schedules, records held on network drives requiring disposal will be identified by Information Asset Owners and signoff obtained from Directors before they are deleted.

Email: Staff are responsible for managing their email accounts, ensuring required attachments are securely saved within the network folders and unneeded information is deleted.

9. Accidental Loss of Data

If information is accidentally lost or unauthorised access to information comes to light, please use the Incident Notification process which is available on the Intranet. Any breach or 'near miss' should be reported in order that we can learn from these instances and improve our practice.

10. Training

Information Asset Owners have all been provided with an Information Asset Owners Handbook, which is also available on the Intranet. Training and support for staff will be provided by the Information Governance Officer and staff are afforded opportunities for further formal training as required for their role.

11. Preservation of Records

SPT has an agreement in place with Glasgow City Archives for the long-term preservation of significant historical records.

12. Policy Review

This policy will be reviewed every three years or sooner if required due to legislative changes.

Signature: _____ Print: _____

Date: _____ Designation: Assistant Chief Executive