East Lothian Council

REPORT TO: East Lothian Council

MEETING DATE: 28 October 2014

BY: Depute Chief Executive (Resources and People Services)

SUBJECT: Records Management Plan (Public Records (Scotland) Act 20110

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1   PURPOSE

1.1   For approval of the Records Management Plan (RMP) required by the Public Records (Scotland) Act 2011 prior to the agreed submission date of 31 October 2014.

2   RECOMMENDATIONS

2.1   That the Records Management Plan and associated action plan is approved as the Council's official submission to the Keeper of the Records of Scotland.

2.2   That the Head of Council Resources is delegated authority to adapt and update the Records Management Plan (Appendix 1) as required to ensure that it remains a relevant and active document guiding the Council's improvements over the next 5 years.

2.3   That an annual report by the Head of Council Resources be submitted to Cabinet to provide evidence and updates on the progression of the Plan.

3   BACKGROUND

3.1   On 1 January 2013 the Public Records (Scotland) Act came into force requiring all named public authorities to produce a Records Management Plan setting out the current arrangements and any necessary improvements to Records Management practices across the authority.

3.2   On 28 May 2013 the Records Management Steering Group was formed, chaired by Jim Lamond, Head of Council Resources. In June 2013 the Information and Records Management Policy was adopted and June 2014 the Business Classification Scheme and Records Retention Schedule were approved by Cabinet

3.3   Following a long drafting process the proposed Plan has been agreed by the Records Management Steering Group and is now submitted for formal approval.

4   POLICY IMPLICATIONS

4.1   This is a legal requirement placed on the Council by the Public Records (Scotland) Act.

4.2   It may be necessary to revise and update policies in line with the required improvements to practices and procedures but this will all be aimed at service improvement and enhancing legal compliance.

5   EQUALITIES IMPACT ASSESSMENT

5.1   An Equalities Impact Assessment has been completed and no negative impacts have been found.

6   RESOURCE IMPLICATIONS

6.1   Financial – At this time there are no additional projected costs above existing budgets. This may change depending upon specific responses to developing and improving procedures and will be identified separately,

6.2   Personnel - All work is currently projected to be met from within existing staff complement. However, the work of implementing the Plan will have an impact on how staff time is allocated across all departments as the necessary improvements are made.

6.3   Other – N/A

7   BACKGROUND PAPERS

7.1   None

AUTHOR'S NAME	Alex Fitzgerald
DESIGNATION	Records Manager
CONTACT INFO	01620 820623
DATE	15/10/2014

East Lothian Council & East Lothian Licensing Board

Records Management Plan

2014 – 2019

Contents

Background

On 1st January 2013 the Public Record (Scotland) Act came into force, obliging all of the named public authorities to create a Records Management Plan that covers the 14 Elements which are deemed to indicate that appropriate measures are being taken by the organisation to manage its records and information.

East Lothian Licensing Board is submitting a joint plan with East Lothian Council due to the closely integrated nature of the work that is undertaken, with shared staffing at all levels. Therefore the administration of the Board conforms to the records management principles of the Council.

The following plan is designed to be responsive to the changing environment in which we operate and timings may alter based upon any new information. It is setting out the commitment that East Lothian Council and Licensing Board both possess towards continuous improvement particular in relation to their Records Management.

Elements 1 – 3 – Responsibility & Records Management Statement

In accordance with the terms of the Public Records (Scotland) Act 2011, East Lothian Council has formally adopted an Information and Records Management Policy (Appendix 1) and has identified individuals with both operational and senior management responsibility for Records Management

The policy was formally adopted by East Lothian Council with approval by Cabinet on 11th June 2013 (Appendix 2). The formal allocation of operational responsibility has been made and the named individuals have been notified to the National Records of Scotland.

Angela Leitch, Chief Executive has confirmed that these responsibilities will be allocated as follows:

> Senior Management Responsibility
>
> > Jim Lamond, Head of Council Resources, jlamond@eastlothian.gov.uk
>
> Records Manager Responsibility
>
> > Alex Fitzgerald, Records Manager, afitzgerald@eastlothian.gov.uk

The Council will continue to ensure that both areas of responsibility are supported if there is any alteration to the current staffing. As part of this work the Council has established a Records Management Steering Group (sample minute provided) which is chaired by Jim Lamond to provide an efficient vehicle for improvements across the organisation. Mr Lamond is also chairing the Project Board for the Electronic Document and Records Management System.

The Records Manager is part of the Records Management Steering Group, the EDRMS Project Board, the Freedom of Information Working Group, and Information Security Forum. Alex Fitzgerald wrote the Information and Records Management Policy, edited and adapted the Business Classification Scheme and the Records Retention Schedule to balance the theoretical considerations of Records

Management against the practical requirements of the departments and was involved in the development of the project brief for the EDRMS project to ensure that key Records Management principles were included in the tendering process. The post holder is required to hold a qualification in Archives and Records Management.

For East Lothian Licensing Board the Senior Management Responsibility rests with

Kirstie MacNeill, Clerk of the Licensing Board, kmacneill@eastlothian.gov.uk

Records Management responsibility for the Board has been delegated to East Lothian Council and so the operational element is undertaken on their behalf by Alex Fitzgerald, Records Manager, East Lothian Council.

All Council policies once approved by the appropriate formal process are made available to both members of Staff and also to the public via electronic means. All new approved policies are indicated to staff via the 'E-news' distribution list which goes to all staff and are then made available on both the external website and in an appropriate location on the intranet.

Action Plan		
Action	Date	Action By
Review of Information and Records Management Policy	Before 11 June 2016	Records Management Steering Group; Records Manager; Head of Council Resources
Ratification of East Lothian Council's Records Management Policies & procedural documents.	23 October 2014	East Lothian Licensing Board

Appendix:		
1	Information and Records Management Policy	http://www.eastlothian.gov.uk/download/meetings/id/14559/03_information_and_records_management_policy
2	Cabinet Minutes 11th June 2013.	http://www.eastlothian.gov.uk/download/meetings/id/14738/public_cabinet_minute_11_06_13
3	Sample Minute of Records Management Steering Group	Appendix 3.
4	Letter from Angela Leitch, Chief Executive confirming allocation of roles	Appendix 4.
5	Letter from Clerk of Licensing Board authorising delegation to Council.	Appendix 5.

Element 4 – Business Classification Scheme

To demonstrate the effective and efficient management of the information that is created and managed by the Council it is adopting the following steps to establish the framework in which it categorises information and the rules by which it is managed.

East Lothian Council has adopted an adjusted variant of the Local Government Classification Scheme (LGCS) as the basis for its Classification Scheme, and will be at certain points utilising this as a file plan. This will be undertaken through the gradual restructuring of shared areas of the network to reflect the functional approach which has been agreed is more resilient to organisational change and will eliminate some of the risks of non-standard folder naming conventions. This methodology will also be considered for implementation across the physical file storage areas as appropriate. The scale of this requirement is being gauged through the Records Management Survey that is currently underway. A sample of the survey is included as Appendix 7.

East Lothian Licensing Board functions are included within the East Lothian Council Classification Scheme under the Consumer Affairs category.

Further to the shared drives the adjusted LGCS has been incorporated into the Civica Electronic Document and Records Management System as the base framework for the categorisation and management of the information that is held within that system. This system is being investigated as a potential Corporate EDRMS solution for the Council but this has not been fully developed as a project proposal at this time. There are further to this system other EDRMS or EDMS in place within the Council these include: Therefore; Idox; Seemis; Frameworki amongst others.

It is the intention of East Lothian Council to review its current provision for EDRMS and establish a strategy for the best management of the solution or solutions which best serve the overall needs of the Council. The other pre-existing solutions will not be restructured to comply with this classification scheme but equivalences will be drawn to enable effective management of the information that they contain in line with the principles set out across the organisation.

To establish the current departmental readiness for implementation of this scheme to their file holdings a Council wide survey was commenced in September 2014 with questions targeted to establish the quantity of material both physical and electronic held but also to gauge the users' confidence relating to filing cabinet and shared electronic drive organisation.

Action Plan		
Action	Date	Action By
Completion of Survey	December 2014	All Departments
Analysis of Results	January – February 2015	Records Manager / Management Team
Development of targeted Plan of implementation of Classification Scheme	March 2015	Records Management Team / Steering Group
Implementation Phase (Classification)	April 2015 – March 2018	Records Management Team / Departments
EDRMS Review	August - October 2015	Records Management Team / Departments

Appendix:		
6	Business Classification Scheme	http://www.eastlothian.gov.uk/downloads/file/3630/retention_schedules_june_2014
	Retention Schedule	http://www.eastlothian.gov.uk/downloads/file/3630/retention_schedules_june_2014

7	PR(S)A Survey	Appendix 7.
8	Approved Version of minutes from meeting in June 2014.	http://www.eastlothian.gov.uk/meetings/meeting/5507/cabinet

Element 5 – Retention Schedules

East Lothian Council and East Lothian Licensing Board have both adopted an adapted version of the Scottish Council on Archives Records Retention Schedule, utilising the functional approach to increase their resilience to change and improve the co-ordination of the management of records based on type. This was formally approved by Cabinet in June 2014 and is made available to all staff on the intranet and is referenced in the training module on Records Management available to all staff online.

The survey being undertaken at this time is informing the process directly and both assists the Council in gauging each department's ability to link their current holdings with the schedule but also to ascertain the level of confidence within departments as to the accurate implementation of the rules to their specific holdings.

Upon the completion of the survey once we have ascertained both the general quantity of information in all of the diverse storage locations, and have completed the review of the archival and destruction protocols a full implementation plan will be developed to effectively manage the assessment and appropriate retention of our holdings. This will focus on physical file holdings at the first stage and will when feasible begin to be applied to the electronic holding in shared drives, and then with the various EDRMS systems and finally within the Email Archive. This process can be run in parallel with the others as we target particular departments and teams but will follow on from the necessary improvements to classification and quantification of holdings.

Action Plan		
Action	**Date**	**Action By**
Completion of Survey	December 2014	All Departments
Analysis of Results	January – February 2015	Records Manager / Records Management Team
Development of procedures supporting retention processes linked to Elements 6 & 7.	April - May 2015	Records Manager / Records Management Team
Development of targeted Plan of implementation of Retention Rules against physical file backlog	June 2015	Records Manager / Records Management Steering Group
Retention Schedule Implementation Phase	October 2015 – March 2018	Records Management Team / All Departments

Appendix #		
2	Cabinet Minutes Approving Retention Schedule	http://www.eastlothian.gov.uk/download/meetings/id/14738/public_cabinet_minute_11_06_13

5	Survey	Appendix 5
7	Retention Schedule	http://www.eastlothian.gov.uk/downloads/file/3630/retention_schedules_june_2014

Element 6 – Destruction Arrangement

There are currently a range of different destruction arrangements in place across the Council all focused on ensuring that information is destroyed securely. These include utilising the Print Unit Shredder, 28 Shred-It units located around all buildings, and a small number of shredders in offices for paper files. All electronic data storing assets are processed by one single process overseen by the Council's Infrastructure and Security Team Leader.

East Lothian Council's Information Technology department currently has a contract with a specialist data Destruction Company Tes-Amm. As part of the contract it is stated that all deletion is to conform to standards for the secure destruction of data such as EN15713:2009 and to ensure the Council meets its other security obligations as well. As part of the standard operating procedures, all items awaiting destruction are held in a secure storage area until the company collects them. As part of this same contract all out of date backup tapes are shredded onsite by the same company.

For internal destructions by the Records Management service there is a database which records at the minimum: authorising officer; method of destruction; and reason for destruction. These are for Records removed from the Records Store and processed via the Print Unit shredder and covers all departments of the Council and the Licensing Board when appropriate.

The 28 Shred-It units are located within Council premises and provide an immediate avenue for the secure destruction of records. The units and processes comply with the following standards: BS7858 and BSIA EN15713.

The Public Records (Scotland) Act survey being undertaken across the organisation includes questions relating to current destruction processes and practices and also readiness to implement a monitoring procedure if one does not exist. Early figures show that this is an area for significant improvement as local processes are not currently in place.

East Lothian Licensing Board also follows the same procedures and protocols. Its equipment is managed by the Council's IT Department and so is also destroyed and managed to the same standard, as are the backups as the data is held on the same systems.

Action Plan		
Action	**Date**	**Action By**
Completion of Survey	December 2014	All Departments
Analysis of Results	January – March 2015	Records Manager / Records Management Team
Development of Local protocols for use of shredders	April – May 2015	Records Management Team/ Departmental Representatives
Implementation of Protocols	June – September 2015	Records Management Team / Departments

Investigation into comparative costs / efficiencies of different models of destruction	August – November 2015	Records Manager / Records Management Team
Report on outcome of investigation	December 2015	Records Manager
Implement findings of report	January – March 2015	Records Management Team/ Departmental Representatives
Improvements to Records Centre Database and processes to facilitate enhanced processing of Destroyed files.	April 2015 – March 2016	Records Management Team

Appendix #		
9	Copy of recent redacted destruction certificate from Tes-Amm	Appendix 9
10	Copy of redacted report generated during asset destruction procedure	Appendix 10
11	Shred-It Procedural Poster	Appendix 11
12	Shred-It Destruction Certificate	Appendix 12
13	Records Centre Database entry for destroyed record.	Appendix 13

Element 7 – Archiving and Transfer Arrangements

East Lothian Council maintains its own Archive service as part of the Licensing, Administration and Democratic Services team. This service is located within the John Gray Centre and provides a secure and environmentally controlled store for the permanent preservation of any physical documents selected in line with the Acquisitions policy.

The service employs professional staff to oversee the service and work within a professional framework in relation to cataloguing, access and preservation standards.

East Lothian Licensing Board is also able to take advantage of the East Lothian Council Archive service and will transfer material there without any additional complications due to the close working relationship between the Council and the Licensing Board.

Action Plan		
Action	Date	Action By
Formalise Acquisitions Policy via Committee process	March 2015	Records Management Team
Develop detailed user guidance for archival transfers	February – March 2015	Records Management Team
Investigate EDRMS export options for transfer of archival material from current electronic systems	November 2015 – March 2016	Records Management Team / Local EDRMS administrators/ IT

Appendix #		
14	Information on East Lothian Archives	http://www.johngraycentre.org/about/archives/
15	Acquisitions Policy	Appendix 15
16	Archivist Job Description	Appendix 16

Element 8 – Information Security

An Information Security Management System ensures that East Lothian Council's records are protected, accessible and remain private as required and that they are of good and provable integrity.

The Council seeks to prove that records, no matter their format, are reliable representations of the decisions, actions and advice that were made or issued. All users of the Council systems are required to sign as part of their contract of employment the Acceptable Use Policy which sets out to all users the Information Security framework in which they are operating, so there is a good level of awareness on this issue amongst employees.

This function integrates neatly with the Data Protection and the Data Sharing elements and further information on those elements can be found in their integrated section of this plan.

The current Information Security Policy was signed and authorised by the Chief Executive in October 2011. This high level one page policy sets out our Information Security objectives and is part of the councils Information Security Management System (ISMS). The Council's ISMS aligns with IS027001. The ISMS is continually updated to ensure it meets requirements to allow the Council to deal with new and evolving threats. The Council has a member of staff whose remit specifically includes oversight of the Security issues connected to the systems that are in place and who chairs the meetings of the Information Security Forum where representatives from across all sections attend for briefings and practice sharing.

In addition to the trained staff and the Information Security Policy the Council also has a raft of internal documents to support and demonstrate its compliance which, due to their sensitive nature, the Council is not able to share. These include our Security Policy Manual, Penetration Testing Reports, Physical Security Access Review Reports, and documentation setting out the Council's Public Services Network Accreditation.

While the Council are confident that the measures that we have in place are robust there are further improvements that can be made and there is no room for complacency in relation to security and there is a need to remain vigilant.

East Lothian Licensing Board benefits from the same standards of information security through the co-location of resources, staff training and awareness of issues. Sharing of equipment and infrastructure means that it receives the same standard of protection for its physical and electronic information and its subsequent disposal or destruction.

Appendix		
17	Information Security Policy	Appendix 17
18	Information Technology Service Plan 2013/14 – including Security statement	http://www.eastlothian.gov.uk/download/downloads/id/8156/ict_strategy-march_2014-it_service_plan_1314_v1_5pdf
19	Internal Audit Report on Quality and Assurance checks including Information Security	http://www.eastlothian.gov.uk/download/meetings/id/15455/11_controls_assurance_statement_201314
20	Acceptable Use Policy	Appendix 20

Action Plan		
Action	**Date**	**Action by**
Review of Information Security Policy	December 2015	Information Security Forum /
Review of Security Policy Manual	December 2015	Infrastructure and Security Team
Arrange External security review (to be updated every three years to maintain standards)	August 2015	Infrastructure and Security Team Manager
Review Departmental Protocols - utilising Records Management Survey as guide	October – December 2016	Infrastructure and Security Team Manager / Records Management Team
Improve Information Security Protocols relating to physical records & implement	January 2017 – August 2018	Infrastructure and Security Team Manager / Records Management Team / All Departments

Elements 9 & 14 – Data Protection/ Shared Information

Since Data Protection and Information Sharing occupy much of the same ground and are supervised by the same staff member these elements have been combined as the evidence and the processes that demonstrate the Council's compliance are the same.

East Lothian Council employs a member of staff whose remit includes ensuring organisational compliance with the Data Protection Act 1998. The Council's Data Protection Policy is supported by a raft of appropriate guidance and supporting documentation. This guidance is further supported by the inclusion of data protection in all corporate inductions, mandatory data protection training every two years for all staff members handling personal data, a compulsory online training module and a Data Protection 'Health Check' by the Data Protection and Freedom of Information Compliance Officer for each department.

A central register is maintained of Data Sharing Agreements, Data Processing Agreements, Non-Disclosure Agreements and Information Sharing Minutes of Agreement. These agreements record the name of the organisation with which information is shared, its contact details, the date of agreement, the date it is due for review, the internal department contact and a reference number linking into the document management system where a copy of the agreement is held. The Council also utilises standard templates for all Data Sharing, Data Processing and Non-Disclosure agreements, copies of these are available on request.

East Lothian Council is registered with the Information Commissioner under reference number: Z5759571.

East Lothian Licensing Board is not currently registered with the Information Commissioner. The members of staff administering the work of the Board receive support and guidance and training as Council employees and so are aware of the issues relating to this area of work and comply with the Council's policies on Data Protection and Information Sharing. A data processing agreement is currently being prepared.

Action Plan		
Action	Date	Action by
Data Processing / Sharing Register – extend across all departments	March 2015 (& ongoing)	FOI & DP Compliance Officer
Data Protection Health Check (Council Wide)	December 2016	FOI & DP Compliance Officer & Records Management Team
Extend FOI Departmental Contacts into a Data Protection Co-ordination group	August 2015	FOI & DP Compliance Officer & FOI Working Group
East Lothian Licensing Board – investigation into Data Protection status and information sharing requirements	October – November 2014	FOI & DP Compliance Officer / Clerk of the Licensing Board

Appendix #		
21	Data Protection Guidance for the public	http://www.eastlothian.gov.uk/info/704/data_protection_and_freedom_of_information/535/a_guide_to_the_data_protection_act_1998/2
22	Information Charging Policy	http://www.eastlothian.gov.uk/downloads/file/6857/information_charging_policy
23	Data Protection Policy	http://www.eastlothian.gov.uk/download/meetings/id/13898/03_data_protection_policy
24	FOI and Data Protection Compliance Officer Job Description.	Appendix 24
25	Pan Lothian Protocol	http://www.eastlothian.gov.uk/downloads/file/844/pan_lothian_information_sharing_protocol
26	Register of Agreements	Appendix 26
27	Online Training Module	Appendix 27 (cf Appendix 38 for descriptions)
28	Cabinet Minutes approving Data Protection Policy	http://www.eastlothian.gov.uk/meetings/meeting/5253/cabinet

Element 10 – Business Continuity and Vital Records

Element 10 obliges the Council to integrate preparations for its vital records into its Business Continuity planning processes.

As an emergency could impact significantly and negatively on the operations of the Council and all activities are underpinned by the information that is held and processed it makes it necessary to include vital records into all plans.

The Council employs a member of staff whose remit is to oversee and co-ordinate the Business Continuity and Emergency planning needs of the organisation. This role is supported by the existence of the Risk Management Strategy which establishes the Council's position in relation to risk. This function is further supported by the introduction of corporately accessible software that enables all plans to be shared, updated and monitored as required.

New training is being offered to all staff responsible for undertaking Business Continuity Planning and specific Vital Records guidance has been created to support them in establishing which of their records are vital and establishing what steps need to be taken to ensure that business proceeds as required.

Action Plan		
Action	**Date**	**Action by**
Completion of all new Departmental Business Continuity Plans in line with the new template	November 2014	All appointed Single Points of Contact (SPOC) for Business Continuity.
Business Continuity Space Survey	December 2014	Emergency Planning & Risk Manager & SPOCs
Go Live on new Business Continuity online portal	January 2015	Emergency Planning & Risk Manager

Appendix #		
29	Risk Management Strategy	http://www.eastlothian.gov.uk/download/meetings/id/14163/04_council_risk_management_strategy
30	East Lothian Council Business Continuity Management System Guidance and Policy Statement	Appendix 30
31	Business Continuity Plan Template	Appendix 31

Element 11 – Audit Trail

Current arrangements for Audit trail of documents are dependent on context. The Public Records (Scotland) Act survey undertaken by the Records Management team is seeking to establish requirements and current level of provision of control across the organisation.

The Records Store has a process whereby any individual file removed from the store is logged so that the location and interactions of those files normally held by the Records Store are recorded. This record is held by the Records Management team.

There is a wide range of Electronic Document and Records Management functional software currently in use across the Council. The majority of these possess elements of version control and

audit trails and these provide security and audit. There is a need to explore the details of these software applications and confirm the scope and method of their recording.

There are local practices in some departments to safeguard the integrity of the information they hold through capturing interactions and alterations to data. These will be further explored, listed and where possible any best practice which is replicable will be encouraged in other departments / teams. These systems, protocols and investigations will also apply to East Lothian Licensing Board records, staff and processes.

Action Plan		
Action	**Date**	**Action by**
Complete Survey	December 2014	All Departments
Analyse Survey results	January – March 2015	Records Manager / Records Management Team
Develop specific EDRMS survey on Audit Functionality	November 2015	Records Management Team / Local EDRMS administrators/ IT
Distribute / undertake EDRMS survey	December 2015 - March 2016	Records Management Team / Local EDRMS administrators/ IT
Analyse results of EDRMS Audit survey	April 2016	Records Management Team / Local EDRMS administrators/ IT
Develop Strategy on audit trail for both EDRMS & physical records	August 2016 – October 2016	Records Management Team / Local EDRMS administrators/ IT
Develop protocols for staff to follow with higher risk documents outside of EDRMS	November 2016 – January 2017	Records Management Team / Local EDRMS administrators/ IT
Investigate options for increased EDRMS usage to facilitate integrated audit trails	November 2016 – January 2017	Records Management Steering Group / Local EDRMS administrators/ IT

Appendix #		
32	Example of Records Centre Audit Trail sheet	Appendix 32
33	CIVICA EDRMS Examples of Audit trail functionality	Appendices 33a & 33b

Element 12 – Competency Framework for Records Management Staff

Element 12 obliges the Council to possess a competency framework for the knowledge and skills expected of their Records Manager.

The expected skills for the Records Manager are set out in the Job Outline and Person Specification for the Records Manager, this links into nationally recognised professional qualifications. Further

developments are supported via the Performance Review and Development process whereby it is possible to identify support and training needs to be sourced by the Council.

The Records Manager will be supported by the Council's Archivists whose skill set is also set out in their Job Outline and Person Specification. They will similarly be provided with support and training through the PRD Process.

Further to this a compulsory new Records Management training module is being implemented that all staff will be required to every two years to ensure that all staff have a fundamental awareness of how their role interacts with the Records Management function across the entire organisation.

East Lothian is keen for all staff to be aware of the vital role that they play in the success of Records Management. The administrative staff of the Licensing Board are also Council employees and are also included in these initiatives and have access to the same support and training resources.

Action Plan		
Action	Date	Action by
Submit report to Cabinet making Records Management module compulsory	March 2015	Records Manager / Cabinet
Report uptake of module and passing stats – include in annual reporting	April 2016	Records Manager / Records Management Team
Train 'records Champions' & implement support network across Council and Licensing Board	April 2015 – October 2019	Records Management Steering Group / Records Management Team

Appendix #		
34	Records Manager Job Outline	Appendix 34
35	Performance Review and Development FAQs	Appendix 35
36	Performance Review and Development Guidance Notes	Appendix 36
37	Performance Review and Development Template for Managers	Appendix 37
38	E-learning module descriptions – including Records Management	Appendix 38

Element 13 – Review and Assessment

East Lothian Council and East Lothian Licensing Board are represented on the Records Management Steering Group. This group has taken the strategic lead on developing and adjusting the Records Management Plan and its assorted elements of evidence to suit their needs and purposes. This group will continue and will be reviewed in relation to how it represents all sections and teams of the Council and Board. The role of the Steering Group will throughout the implementation phases be geared towards being 'Records Champions' and will report its activities to the Council Management Team.

The Internal Audit team has included Records Management and Public Records (Scotland) Act compliance to its Audit plan for 2014 and as part of this it undertook a survey in September 2014 to establish the baseline of compliance across the organisation.

The Council Management Team have proposed an integration of the Public Records (Scotland) Act reporting with the current Freedom of Information / Data Protection Reporting model by which process it stays up to date with the developments in that area.

Action Plan		
Action	**Date**	**Action by**
Submission of Internal Audit Report on PR(S)A Compliance to Audit & Governance Committee	November 2014	Internal Audit
Review of Records Management Steering Group Membership & additional staff included as required	January 2015	Records Management Steering Group / Service Managers
Development of 'Records Champion' brief and training	February – March 2015	Records Management Steering Group
Creation of review protocol for elements of act, in line with deadlines established in the plan.	February – August 2015 (Annual review)	Records Management Steering Group
Analysis of Internal Audit review	February 2015	Records Management Steering Group
Inclusion of PR(S)A compliance in Internal Audit review process	March 2017	Internal Audit

Appendix #		
39	Internal Audit Questionnaire	Appendix 39

Freedom of Information

East Lothian Council acknowledges that there is a strong and beneficial connection between good Records Management practices and compliance with the Freedom of Information (Scotland) Act and seeks to continue this positive relationship through close collaboration and working.

To date the FOI/ DP compliance team have received 945 FOI(S)A requests in 2014. This includes both FOI(S)A and EIRs.

Of these request 97.5% have been responded to on time. This excludes any cancelled or suspended requests which were previously included in the figures.

The figures from 2013 demonstrate the high level of compliance that is currently being achieved.

2013 Timescales			
	FOI	**EIR**	
On time	783	231	93%
Late	64	17	

Lapsed/Written Off	0	0	
Date of Completion Unknown	0	0	
Cancelled/Withdrawn	5	3	
Suspended	21	4	
TOTAL	**873**	255	

The Council and Licensing Board freedom of information request database is accessible here:

http://www.eastlothian.gov.uk/site/custom_scripts/foi_download_index.php?currentPage=1&itemsPerPage=20

The Council and Licensing Board publication scheme is accessible here:

 http://www.eastlothian.gov.uk/downloads/file/6145/publication_scheme

The Council was assessed in December 2012 by the Scottish Information Commissioner and the report from that process is accessible here:

 http://www.itspublicknowledge.info/nmsruntime/saveasdialog.aspx?lID=6236&sID=2756

In 2014 East Lothian Council was positively cited in a Special report on "Failures to Respond" as a Council who achieved significant improvement in previously low figures. This is on Page 22 of the following report

http://www.itspublicknowledge.info/home/SICReports/OtherReports/20140807SpecialReport.aspx

Action Plan		
Action	**Date**	**Action by**
Review FoI Policy	September 2015	FOI & DP Compliance Officer

Appendix #		
40	FOI Policy	http://www.eastlothian.gov.uk/download/meetings/id/13899/04_freedom_of_information_policy
41	Letter of 'assessment of compliance with good practice'	Appendix 41

Approvals and submission

- East Lothian Licensing Board to formally agree to Records Management Plan on 23rd October 2014.

- Records Management Plan & Report to be passed to full Council for approval on 28th October 2014

- Submission to Keeper of the Records of Scotland / National Records of Scotland Public Records (Scotland) Act Implementation Team on 31st October 2014.

Summary Action Table (Chronological)

Element	Action	Date	Action by
3	Obtain formalisation of agreement between licensing board and council for adoption of policies	October 2014	East Lothian Licensing Board
9, 14	East Lothian Licensing Board – investigation into Data Protection status and information sharing requirements	October – November 2014	FOI & DP Compliance Officer / Clerk of the Licensing Board
13	Submission of Internal Audit Report on PR(S)A Compliance to Audit & Governance Committee	November 2014	Internal Audit
10	Completion of all new Departmental Business Continuity Plans in line with the new template	November 2014	All appointed Single Points of Contact (SPOC) for Business Continuity.
10	Business Continuity Space Survey & Plan adaptation	December 2014	Emergency Planning & Risk Manager & SPOCs
4 – 11, 14	Completion of Records Management Survey	December 2014	All Departments
10	Go Live on new Business Continuity online portal	January 2015	Emergency Planning & Risk Manager
13	Review of Records Management Steering Group Membership & additional staff included as required	January 2015	Records Management Steering Group / Service Managers
4 – 11, 14	Analysis of Results of Records Management Survey	January – February 2015	Records Manager /Records Management Team
13	Analysis of Internal Audit review	February 2015	Records Management Steering Group
13	Development of 'Records Champion' brief and training	February – March 2015	Records Management Steering Group
7	Develop detailed user guidance for archival transfers	February – March 2015	Records Management Team
13	Creation of review protocol for elements of act, in line with deadlines established in the plan.	February – August 2015 (Annual review)	Records Management Steering Group

7	Formalise Acquisitions Policy via Committee process	March 2015	Records Management Team
4	Development of targeted Plan of implementation of Classification Scheme	March 2015	Records Management Team / Steering Group
12	Submit report to Cabinet making Records Management module compulsory	March 2015	Records Manager / Cabinet
9, 14	Data Processing / Sharing Register – extend across all departments	March 2015 & ongoing	FOI & DP Compliance Officer
5	Development of procedures supporting retention processes linked to Elements 6 & 7.	April - May 2015	Records Manager / Records Management Team
6	Development of Local protocols for use of shredders	April – May 2015	Records Management Team/ Departmental Representatives
6	Improvements to Records Centre Database and processes to facilitate enhanced processing of destroyed files	April 2015 – March 2016	Records Management Team
4	Implementation Phase (Classification)	April 2015 – March 2018	Records Management Team / Departments
12	Train 'records Champions' & implement support network across Council and Licensing Board	April 2015 – October 2019	Records Management Steering Group / Records Management Team
5	Development of targeted Plan of implementation of Retention Rules against physical file backlog	June 2015	Records Manager / Records Management Steering Group
6	Implementation of Local destruction Protocols	June – September 2015	Records Management Team / Departments
9, 14	Extend FoI Departmental Contacts into a Data Protection Co-ordination group	August 2015	FOI & DP Compliance Officer & FOI Working Group
4	EDRMS Review	August - October 2015	Records Management Team / Departments
6	Investigation into comparative costs / efficiencies of different models of destruction	August – November 2015	Records Manager / Records Management Team
8	Arrange External security review (to be updated every three years to maintain standards)	August 2015	Infrastructure and Security Team Manager
FOI	Review FOI Policy	September 2015	FOI & DP Compliance Officer

5	Retention Schedule Implementation Phase	October 2015 – October 2019	Records Management Team / All Departments
11	Develop specific EDRMS survey on Audit Functionality	November 2015	Records Management Team / Local EDRMS administrators/ IT
7	Investigate EDRMS export options for transfer of archival material from current electronic systems	November 2015 – March 2016	Records Management Team / Local EDRMS administrators/ IT
8	Review of Information Security Policy	December 2015	Information Security Forum /
6	Report on outcome of investigation into shredding arrangements	December 2015	Records Manager
8	Review of Security Policy Manual	December 2015	Infrastructure and Security Team
11	Distribute / undertake EDRMS survey	December 2015 - March 2016	Records Management Team / Local EDRMS administrators/ IT
6	Implement findings of report on shredding / confidential waste destruction	January – March 2016	Records Management Team/ Departmental Representatives
11	Analyse results of EDRMS Audit survey	April 2016	Records Management Team / Local EDRMS administrators/ IT
12	Report uptake of module and passing stats – include in annual reporting	April 2016	Records Manager / Records Management Team
3	Review of Information and Records Management Policy	11 June 2016	Records Management Steering Group; Records Manager; Head of Council Resources
11	Develop Strategy on audit trail for both EDRMS & physical records	August 2016 – October 2016	Records Management Team / Local EDRMS administrators/ IT
8	Review Departmental Protocols - utilising Records Management Survey as guide	October – December 2016	Infrastructure and Security Team Manager / Records Management Team
11	Develop protocols for staff to follow with higher risk documents outside of EDRMS	November 2016 – January 2017	Records Management Team / Local EDRMS administrators/ IT
11	Investigate options for increased EDRMS usage to facilitate integrated audit trails	November 2016 – January 2017	Records Management Steering Group / Local EDRMS administrators/ IT

9, 14	Data Protection Health Check (Council Wide)	December 2016	FOI & DP Compliance Officer & Records Management Team
8	Improve Information Security Protocols relating to physical records & implement	January 2017 – August 2018	Infrastructure and Security Team Manager / Records Management Team / All Departments
13	Inclusion of PR(S)A compliance in Internal Audit review process	March 2017	Internal Audit

The above table is the collated actions from the separate actions identified within each section. It is intended to be indicative of the current focus of East Lothian Council and East Lothian Licensing Board on areas for improvement within their Records Management practices. As some elements are currently subject to additional surveying work it may be possible that timescales will alter in light of the new information that these surveys will provide.

Any further update and alteration to this plan will be made to take into consideration that information and the changing requirements and resources of the Council and the Board. Both the Council and the Board are committed to the principles of continuous improvement put forward as part of the Public Records (Scotland) Act 2011 and this plan is the starting point for this endeavour.

East Lothian
Council