Falkirk Council and

Falkirk Council Licensing Board

Records Management Plan

Setting out proper arrangements for the management

of the authorities public records under Section 1 of

The Public Records (Scotland) Act 2011

Version 4.00

Falkirk Council

Contents

Introduction

Under the Public Records (Scotland) Act 2011 (the Act) Scottish public authorities <u>must</u> produce and submit a records management plan (the Plan) setting out proper arrangements for the management of an authority's public records to the Keeper of the Records of Scotland (the Keeper) for his agreement under section 1 of the Act.

This Plan covers Falkirk Council and Falkirk Council Licensing Board. For the purposes of the Plan, where the word "Council" is used it covers all departments within the Council and the Board.

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."

Records are one of the Council's vital assets and establishing effective records management arrangements will deliver significant benefits for the authority - for example it will help to:

- increase efficiency and effectiveness, delivering savings in administration costs;
- improve and develop service delivery;
- achieve business objectives and targets;
- ensure compliance with the Public Records (Scotland) Act 2011;
- support transparency and open government; and
- underpin business resilience.

The scope of the Plan applies to all records irrespective of the technology used to create and store them or the type of information they contain.

The Council currently takes a hybrid approach to records management and uses the following types of records management systems:
- The Corporate Records Centre (CRC), overseen by the Records Manager, in which services can deposit semi-current and non-current records in paper and certain digital formats.
- Records held by Services. These can include records in:
    o IT applications and databases that process records for specific functions (e.g. Human Resources, Social Work, Finance etc.)
    o Shared drives that hold digital records created by the services across the Council and corporate records.
    o Manual filing systems (for paper and other physical records)

The Council is currently planning the development of SharePoint as part of its wider commitment to the rollout Office 365 in 2020. The functionality offered by Office 365 and applications such as SharePoint and Teams will enable the Council to improve its current approach to the management of digital records currently held in shared drives.

The Council recognises that whilst SharePoint provides many solutions, the product still has room for improvement in its record management functionality. Although Microsoft is continually adding more functionality and regularly releasing new features, the Council is also working with external consultants to ensure that the existing features are developed appropriately.

The Records Manager is a member of a number of local and national working groups, which focus on Office 365 record management functionality and information governance issues to ensure a consistent approach is taken and any developments are fed back to the Council.

Records Management Plan

The Records Management Plan for Falkirk Council and Falkirk Council Licensing Board covers 15 elements, which are:

1. Senior Management Responsibility
2. Records Manager Responsibility
3. Records Management Policy Statement
4. Business Classification
5. Retention Schedules
6. Destruction Arrangements
7. Archiving and Transfer Arrangements
8. Information Security
9. Data Protection
10. Business Continuity and Vital Records
11. Audit Trail
12. Records Management Training for staff
13. Assessment and Review
14. Shared Information
15. Public records created or held by third parties

Element 1:   Senior Management Responsibility

An individual senior staff member is identified as holding corporate responsibility for records management.

1.1   The Senior Manager within Falkirk Council with overall strategic responsibility for records management is:

> Kenneth Lawrie
> Chief Executive
> Falkirk Council
> Municipal Buildings
> Falkirk
>
> Tel: 01324-506070

1.2   The Senior Manager within Falkirk Council Licensing Board with overall strategic responsibility for records management is:

> Colin Moodie
> Clerk to Falkirk Council Licensing Board
> Falkirk Council
> Municipal Buildings
> Falkirk
>
> Tel: 01324-506070

1.3   The Chief Executive and the Clerk fully endorse this Plan and will ensure the required improvements to records management procedures are implemented corporately and monitored by the Records Manager through the assessment and review process.

Evidence:

Appendix 01 - Covering letter from the Chief Executive of Falkirk Council.
Appendix 02 - Covering letter from the Clerk to Falkirk Council Licensing Board.
Appendix 03 - Records Management and Preservation of Archival Records Policy 2020

Element 2:   Records Manager Responsibility

An individual staff member is identified as holding operational responsibility for records management and has appropriate corporate responsibility, access to resources and skills.

2.1   The Information Governance Manager has responsibility for leading the development, implementation and monitoring of corporate information governance and record management strategies, policies and procedures across the organisation. The Information Governance Manager is also the Data Protection Officer for the Council and the Licensing Board.

2.2   The individual who has day-to-day operational responsibility for records management and reports directly to the Information Governance Manager is:

> Suzanne O'Reilly
> Records Manager
> Governance Division
> Corporate & Housing Services
> Falkirk Council
> Municipal Buildings
> Falkirk
>
> Tel: 01324-501227
> email: suzanne.oreilly@falkirk.gov.uk

2.3   Falkirk Council uses a competency framework based on one issued by the Archives and Records Association (ARA), which outlines what the Council considers as the necessary skills and experience required by the Records Manager. This is detailed further within Element 12 of the Plan.

2.4   Element 12 of the Plan also details the Council's approach to staff development and training. The Council is committed to the learning and development of staff and the Achievement and Personal Development Scheme (now superseded with the Good Conversations scheme) provides an opportunity for any training requirements to be addressed.

Evidence:
Appendix 01 - Covering letter from the Chief Executive of Falkirk Council.
Appendix 02 - Covering letter from the Clerk to Falkirk Council Licensing Board
Appendix 03 - Records Management and Preservation of Archival Records Policy 2020
Appendix 04 - Records Manager Achievement and Personal Development Plan

Element 3: Records Management Policy Statement

A records management policy statement underpins effective management of an authority's records and information. It demonstrates to employees and stakeholders that managing records is important to the authority and serves as a mandate for the activities of the records manager.

3.1 Falkirk Council's Records Management and Preservation of Archival Records Policy 2020 (the Policy) is available on both the Council's website and Inside Falkirk (intranet site).

3.2 The Policy details the role of the Information Management Working Group (IMWG) which is responsible for the continued assessment and review of the Records Management Plan and for ensuring that a corporate approach to information management is adopted throughout the Council. The IMWG reviewed the Policy on 12th March 2020. The Policy was then submitted to the Chief Executive, who approved the Policy on the 26th June 2020.

3.3 The Policy includes the following signed statement from the Chief Executive:

> *"Records management is fundamental to the Council's efficiency and we believe that effective records management will bring substantial benefits to the Council. This can be achieved through greater business efficiency and improvements in the use of financial, human and other resources.*
>
> *Effective records management ensures that all information:*
>
> - *received or created is stored appropriately and is easily retrievable;*
> - *is destroyed or preserved in accordance with the Council's Business Classification and Retention Schedule;*
> - *meets current and future needs, and is capable of supporting change; and*
> - *is accessible to users and that the appropriate technical, organisational and human resource elements exist to make this possible.*
>
> *The introduction of the Public Records (Scotland) Act 2011 highlights the importance placed on records management within local authorities. It is our aim to ensure we produce and implement an effective Records Management Plan to meet the requirements of the Act and support business functions and activities for as long as they are required. The Plan will be regularly assessed and reviewed to ensure its effectiveness in terms of records management throughout the Council."*

3.4 The Policy includes a section on review and states:

> *This Policy will be reviewed in conjunction with the assessment and review of the Records Management Plan required under the Act.*

3.5 The People, Technology and Transformation (PTT) division of the Council is currently responsible for providing specialist/technical advice in relation to all aspects of managing digital records including their secure storage.

Evidence:

Appendix 03 - Records Management and Preservation of Archival Records Policy 2020
Appendix 05 – Information Management Working Group remit

Extract of Minute of Meeting of the IMWG:

'Noted:

    (ii)   The RMP requires the Council to have a Records Management Policy Statement. This policy documents the importance of effective records management and the statutory obligations that Falkirk Council has with regards to its record keeping. The IMWG reviewed the policy and agreed it should be submitted to the Chief Executive for approval.'

Element 4:   Business Classification

Records are known and are identified within a structure, ideally founded on function

4.1   Falkirk Council has developed a Business Classification Scheme (BCS) covering all functions of the Council, further divided into activities and transactions. This structure enables the BCS to remain relevant regardless of any structural changes to the organisation.   It includes all records and information held by the Council regardless of format.

4.2   The BCS is a localised version of the model BCS published by the Scottish Council on Archives (SCA). The template scheme provided by SCA was reviewed by officers within all Council Services to ensure that it covered all records created by the Council. It was then issued to all Council staff for final consideration before being approved by the IMWG on 29th August 2019.   The combined BCS and Retention Schedule was published on the Council's website on 1st October 2019.

4.3   The BCS is generally not implemented throughout the Council's shared drives, both in relation to structure and retention. However, it is integral to the design and move to the implementation of SharePoint and work is now ongoing with the PTT division to develop a detailed file plan and file naming conventions. The attached appendix shows File Plans that have been created in various systems including file servers and Service-specific systems.

4.4   A SharePoint Proof of Concept is underway in one service area and part of this work is to identify how the BCS could be used to create, use and manage records.

4.5   Where the Council has contracted out a function to a third party, the BCS will not be affected as we will ensure this function remains in the BCS. If a third party would like to use the BCS, then the appropriate function, activities and transactions folders for that specific function can be provided to the contractor to assist with their records management.

4.6   The combined BCS and Retention Schedule is a live document which will be kept up-to-date by Services. When a change to a the structure of the schedule is made, these will be reflected in the BCS. The Records Manager will work with Services to ensure that the BCS is periodically reviewed and updated where necessary.

4.7   To provide better oversight of the Council's information assets and responsibility for those, an Information Asset Register (Register) has been developed to record all the Council's information assets. The Register provides relevant information on each asset such as:

- Its primary and secondary locations
- The information asset owner and service/team responsibility
- Whether it contains personal data (including special categories data)
- Details on any data protection impact assessments carried out (DPIA)
- Whether it is a key asset
- Access arrangements and whether any information is shared with third parties
- The BCS schedule which applies to the records held in the asset and the retention period

The Register has been designed to allow information asset owners to add new assets or amend existing ones. Any new assets are reviewed by either the Information Governance

Manager or Records Manager prior to their publication on the Register. The Register can be easily searched and can produce detailed reports. An audit trail ensures that any changes to the Register can be tracked.

Evidence:

Appendix 06 - Falkirk Council Business Classification Scheme
Appendix 07 – File Naming Convention guidelines
Appendix 08 – Screenshots from Information Asset Register
Appendix 09 – Extract from SharePoint file plan structure

Element 5:   Retention Schedules

Records are retained and disposed of in accordance with the Retention Schedule

5.1   The Council has adopted a Corporate Records Retention Schedule which governs how long records should be kept and what action should be taken at the end of their lifecycle. The combined BCS mentioned in Element 4 details the link between the classification scheme and the retention schedule, which is also a localised version of the SCA Records Retention Schedule.

5.2   The template schedules provided by SCA were reviewed by officers within all Council Services to ensure that they covered all records created by the Council. It was then issued to all staff for consideration before being approved by the IMWG on the 29th August 2019. The consultation period of 10 months allowed sufficient time to ensure that the retention and disposal actions were recorded accurately. Version 1.1 was published on the 1st October 2019 on both the Council's website and Inside Falkirk (intranet) and will be periodically reviewed. Both the full schedule and individual schedules are available in PDF format, making it easier to search for a specific activity series.

5.3   The schedules provide details on the justification for the retention period. Where available, a statutory or regulatory driver is cited under the column 'Authority' and this is detailed in the column 'Notes'. Where there is no specific statutory or regulatory retention period for a record series, the Council has defined the justification as a 'business requirement'. This will often reflect common or best practice. The Records Manager works closely with the Data Protection Officer to ensure that no personal data is kept for longer than necessary, in line with the storage limitation principle. The Council's privacy notices (which are required under GDPR) reference the relevant retention schedule. Privacy notices are regularly reviewed, which means that retention periods are reviewed at that point.

5.4   Services must complete an update pro-forma if they require changes to be made to the Schedules. The Schedules are maintained by the Records Management unit of Corporate and Housing Services. Any changes are notified to the online Yammer group, "Information Matters" and noted at future IMWG meetings.

5.5   The retention schedule is a live document which will be kept up-to-date by Services. Any changes will be recorded on the change record table within the combined schedule. The Version and Edit History columns will be updated against the individual activity. The Records Manager will work with Services to ensure that the schedules are periodically reviewed and updated where necessary.

Evidence:

[Falkirk Council's combined Business Classification Scheme and Retention Schedule (BCS)](#)
Appendix 10 - Retention Schedule Updates Pro-forma.
Extract from the minute of IMWG on 29 August 2019:

> *'The group approved the publication of the whole schedule.'*

Element 6:   Destruction Arrangements

Records are destroyed in a timely and appropriate manner and records of their destruction are maintained

6.1   Destruction of records should occur at the end of retention periods as set out in the Council's BCS. For the purpose of the Plan, destruction or destroyed means either the destruction of paper records or the deletion of digital records.

Corporate Records Centre (paper and digital)

6.2   Records stored within the Corporate Records Centre are managed by the Corporate Records Team (CRT). The CRT has detailed arrangements in place for the secure destruction of paper and digital records.   A report is generated monthly from the CRC database which identifies records that are due to be destroyed. A Destruction of Records Authorisation Form or a Deletion of Electronic Records Authorisation Form is completed and signed prior to destruction. The form is initially signed by the Records Manager or the Corporate Records Administrator confirming records for destruction have been held in accordance with the BCS.

6.3   A second signature is required from an officer within the relevant Service to authorise the destruction or their requirement to retain the information longer than the retention period. Where information is being retained longer than the retention period the officer is required to state the reason(s) why. An additional signature may be required from the Archivist where the records have been identified on the BCS as having historical or archival value. Finally, when a record has been destroyed, the officer undertaking the destruction signs and dates the form with the actual date of destruction.

Service Records (paper and digital)

6.4   For records stored within Services, staff are required to complete a Service Destruction Form. The first signature is required from the officer within the relevant Service to authorise the destruction or their requirement to retain the information longer than the retention period. Where information is being retained longer than the agreed retention period the officer is required to state the reason(s) why.

6.5   An additional signature may be required from the Archivist for any records that have been identified as having historical or archival value to ensure information of archival value is not being destroyed. Finally, when the records have been destroyed, the officer undertaking the destruction signs and dates the form with the actual date of destruction. The form is then passed to the CRC to retain.

Methods of Destruction

(i) Paper Records

6.6   Depending on the volume of records being destroyed, the Council has a number of options open to staff to ensure records are destroyed appropriately. Detailed guidance on the destruction methods available are provided on the intranet site. Shredders are available across multiple sites for use by staff for small volumes of records. For larger volumes of records, the Council has a corporate contract in place for the destruction of confidential waste by an external contractor, which includes both onsite and off-site shredding. The external contractor provides the Council with lockable bins, ensuring that paper records are secure until their collection by the external contractor. For one-off

large collections, the external contractor can provide vehicles to collect the records from the building. Once removed, all records are shredded to BS EN15713:2009 standards.

6.7   Where the services of the external contractor have been used, a certificate of destruction will be supplied confirming that all records have been collected and destroyed. Certificates are passed to the Corporate Records Team to retain along with the appropriate destruction form. All paperwork relating to the destruction of records is retained by the Corporate Records Team and retained in accordance with the BCS.

(ii) Digital Records

6.8   The destruction of digital records within Services-specific systems and in shared drives remains an area in which improvement is required. The introduction of the General Data Protection Regulations in May 2018 highlighted the importance of good record keeping and also re-enforced the need to improve the management of our digital records. The first step was to review the BCS, helping to identify what records were held by the Council and to ensure the retention period was appropriate.

The next step in relation to information held in shared drives is the rollout of 365 and the development SharePoint. It is anticipated that SharePoint will provide a centralised location where records can be stored and managed, with built-in rules around retention and destruction of records based on the BCS. To support the move to SharePoint, we have created guidelines on data cleansing of digital records, providing a practical step-by-step guide on how to carry out data cleansing and the disposal of information from shared drives.

6.9   As well as the use of shared drives, the Council has a range of systems in place across Services which manage information, for example, MyView for employee records, Integra for financial records, Firmstep for customer records. Historically, there was little focus on the records management capability of these systems. With the introduction of GDPR, there is now an increased awareness of the need for any systems which process personal data to have retention-capability in place.

6.10   We have asked Services to audit their "high risk" systems for records management capability and to look to improve on any weaknesses, as and when the system is due for upgrade or subject to a new procurement process.

All of the above steps will enable the Council to manage its digital records more effectively.

Email

6.11   A record of deletion of mailboxes and private folders of employees who have left the authority is recorded through our HR system. The name of the officer authorising the deletion of mailboxes/folders is recorded at the logging in stage when using our HR Forms Online system. This is generally an authorised officer within the Service. Going forward, the Council is using Office 365 to maintain a log of mailbox creations and deletions although this is only currently applicable to mailboxes migrated to Office 365. It is expected that all mailbox will be migrated by September 2020.

Destruction of hardware

6.12   Falkirk Council contracts out the secure recycling and disposal of its hardware. The contractors policy details how they re-use, re-sell, refurbish items and only those items that do not fall into these categories will be treated as landfill waste. Secure destruction

of hard drives and formatting of data is carried out to ISO9001 and ISO1401 quality standards.

Evidence:

Appendix 11 - Guidance on Destruction of Records.
Falkirk Council's combined Business Classification Scheme and Retention Schedule (BCS)
Appendix 12 - Corporate Records Centre Destruction of Paper Records Authorisation Form.
Appendix 13 - Corporate Records Centre Deletion of Electronic Records Authorisation Form.
Appendix 14 - Corporate Records Team Procedures - Destruction of Paper Records.
Appendix 15 - Corporate Records Team Procedures - Deletion of Electronic Records.
Appendix 16 - Services Destruction Form.
Appendix 17 – Electronic Records – Data Cleansing Guidelines
Appendix 18 - Certificate of Destruction - External Contractor

Element 7: Archiving and Transfer Arrangements

This is the mechanism by which an authority transfers records of enduring value to an appropriate archive repository, specifying the timing of transfers and other terms and conditions.

7.1   Falkirk Archives is operated by Falkirk Community Trust Ltd. (the Trust) which is a charitable company set up to carry out cultural and leisure services for the Council on 1 July 2011. Falkirk Council deposits archival records in Falkirk Archives. The Licensing Board keeps their records digitally within their own computer system, other than Licensing Board meeting reports and minutes which are held in Archives along with Council committee papers.

7.2   A Collections Agreement exists among the Council, the Trust and Falkirk Community Trading Ltd. which licenses the Trust to manage the collections of the Council (which includes any archival material) and which defines the role and responsibilities of the Archivist in relation to the collections.

7.3   A Collaborative and Working Agreement is in place between Falkirk Council and the Trust which commits the parties to taking all reasonable steps to maintain partnership and collaborative working in key areas in the future, including records management. The Agreement includes a copy of a more detailed Service Level Agreement (SLA) agreed between the Council and the Trust in relation to records management and archives. The SLA has since been amended to an Operational Agreement.

7.4   The Operational Agreement sets out the roles of the Records Manager, the Corporate Records Team and the Archivist in relation to the management of Council records. The Records Manager and Archivist report on progress annually or if there are any significant changes in the capacity of either the Council or the Trust to fulfil its obligations. The agreement is reviewed every three years.

7.5   The methodology for the appraisal and selection of records for Falkirk Archives is described in the Appraisal & Selection Statement of Practice. Detailed appraisal information is recorded in the Appraisal database.

7.6   When records held by the Corporate Records Centre reach the end of their retention period they are listed on destruction forms. For those records that have archival or historical value (as stated in the BCS), approval is sought from both the responsible Service and the Archivist for destruction. This process enables the Archivist to identify individual records which may have archival value and to identify any file series which require an appraisal review. Archive selection is in accordance with the retention schedule and is format neutral.

7.7   When collecting information from individuals, Falkirk Archives follows procedures to ensure that the principles of data protection legislation are followed. The procedures also cover access to archive material which is restricted if the record contains personal information of living identifiable individuals.

Transfer Arrangements

7.8   Records identified in the BCS for Archives are transferred from the Corporate Records Centre or direct to Archives from Services. The CRC produces monthly reports to identify records that it holds that are due to be transferred to the Archivist. The CRC database is updated to show that the record is "archived". An audit trail of when the records were transferred is kept within the database. Paper records are transferred by hand-delivery by Council employees. Digital records are copied from their current

location into an Archives Document Retrieval Area. These are then available for the Archivist for accession into Archives. The original record is only deleted once the transfer is complete and the Archivist has confirmed receipt and checked that the records were not corrupted in transit.

7.9   Records received in Falkirk Archives from Services are documented on an Entry Form. Routine deposits are listed on a spreadsheet prior to accession. The formal accession process takes place once the Archivist is confident that the files deposited are the prime record and are not working copies which will later be replaced by the prime record.

7.10   The Archivist is currently looking at digital collections and has recently purchased two TS-431X2 QNAP storage drives. These will ensure 16TB of data for digital records, which will allow the use of digital preservation tools (such as checksum) and allow hybrid backup between the two drives which are located in different locations, to ensure business continuity. The Archivist is currently working on a draft digital preservation strategy which will be reviewed by the Information Management Working Group.

Public access arrangements

7.11   Falkirk Archives is located at Callendar House. Callendar House is open to the public Monday 10.00am-17.00pm and Wednesday-Sunday 10.00am-17.00pm. The Archives are open 10.00am-16.00pm Monday, Wednesday, Thursday and Friday. The Archivist currently works at the Keep (a separate off-site storage facility) on a Tuesday.

7.12   The Archivist is supported by 2 Archives Assistants and 6 volunteers. Post graduate placements have also been offered to students at the University of Glasgow to undertake specific cataloguing projects.

7.13   The Archivist has been working to improve the visibility of the Archives, locally and nationally by participating in Doors Open Days which were encouraged by Scottish Council on Archives. The Archives is also using social media platforms such as Twitter to provide regular updates to the community. This has increased footfall to the Archives and enabled the archives to engage with a wider audience including volunteers and local community groups.

Evidence:

Appendix 19 – Collaborative and Working Agreement.
Appendix 20 - Operational Agreement
Appendix 21 - Collections Agreement
Appendix 22 - Appraisal & Selection Statement of Practice
Appendix 23 - Appraisal Database (Screenshot)
Appendix 24 - Archives Entry Form (Sample)
Appendix 03 - Records Management and Preservation of Archival Records Policy 2020
Falkirk Council's combined Business Classification Scheme and Retention Schedule (BCS)

Element 8:   Information Security

Information security is the process by which an authority protects its records and ensures they remain available. It also maintains privacy where appropriate and provides for the integrity of the records

Policies

8.1   The Council's Financial Regulations includes a section stating:

> *All Officers of Falkirk Council, Elected Members, and Officers and agents of external organisations who in any way access or have responsibility for any Council information system, or have access to Council owned data, must adhere to the Council's Information Security Policy issued by the Director of Corporate and Housing Services. All new staff should be made aware of the Information Security Policy through the induction process.[1]*

8.2   The Information Security Policy currently in place was approved by the Council's Executive Committee on 14 May 2019, following its review by the Information Governance Manager, the Technology & Infrastructure Manager and the IMWG. The Policy specifically states that its purpose is to ensure the confidentiality, integrity and availability of information in any form.

8.3   All new employees and elected members must read and adhere to an Acceptable Use Policy (AUP), which was also approved by the Executive Committee on 14 May 2019. Although the AUP is in place to address the use of Council equipment and information it also addresses information security related issues. When the AUP is updated, employees and Elected members are notified.

8.4   Training on Information Security is included as part of the mandatory annual data protection training provided to all staff who handle personal data. The training is updated annually and training statistics are reported annually to senior management.

8.5   In addition to the Information Security Policy and the AUP, the Council has the following in place:

8.5.1   Data Protection Policy (see element 9)
8.5.2   Mobile/flexible working guidance, which reinforces the key information security messages for those working in a mobile/flexible way.

Information security risk

8.6   Risks on cyber security and information asset are included in the Council's corporate risk register, and updates are provided periodically to the Corporate Risk Management Group.

8.7   The Council's Director of Corporate and Housing Services acts as the Council's Senior Information Risk Owner.

8.8   The Information Asset Register (mentioned under element 4) ensures that each information asset is linked to an information asset owner, who is accountable for ensuring that the risks in relation to the assets are identified and managed according to the appropriate level of security. This includes user access management, data retention and disposal requirements. Work is ongoing to embed an improved approach to information risk management throughout the Council.

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[1] Financial Regulations, October 2015

8.9 Falkirk Council undertakes two IT security external audits on an annual basis and holds both Cyber Essentials and Public Services Network (PSN) accreditation.

Corporate Records Centre

8.10 Paper records stored in the CRC have restricted access. Only the Corporate Records Team (CRT) and the Service Records Team within Governance have access to the Centre. Keys for the storage rooms are retained within a locked key cabinet and only accessed by the two teams. Any files deposited with the CRT and not transferred to the Centre on the same day are stored overnight in a locked cabinet in the CRT office.

8.11 Paper record retrievals are delivered in sealed envelopes to Services internally by mailroom employees. Paper file retrievals of a sensitive or personal nature are enclosed in secure wallets and delivered by mailroom employees.

8.12 Records kept electronically in the CRC are stored on a server dedicated to the CRT. Specific access rights have been set up and only the CRT and the Records Manager have access.

8.13 Digital record retrievals are copied into document retrieval areas (DRAs) for the customer to view on their own device. DRAs have been created for specific teams within all Services who currently deposit records with the CRT. Only pre-identified and authorised employees within each Service have access rights to their own DRA.

8.14 Any changes to access rights of DRAs require a pro-forma to be completed and signed by an authorising officer within the relevant Service and the Records Manager or the Corporate Records Administrator. Both these signatures are required before the pro-forma is passed to ICT to make the relevant changes to the DRAs.

8.15 For additional security, digital retrievals of a sensitive or personal nature can also be password protected if requested by the customer. The CRT has standard procedures to password protect digital retrievals.

Falkirk Archives

8.16 Falkirk Archives controls access to the collections in order to protect them from damage, loss or unauthorised disclosure. Archives Security Procedures are documented and include arrangements for supervision of users, locked storage areas with key issuing controls, supervision of contractors, reporting of incidents, use of production forms and specific access restrictions to confidential records.

IT Suite Security

8.17 Access to the ICT Suite is controlled by fob access and is limited to PTT employees. Access to the server room within the ICT Suite is only given to necessary IT staff who are supplied with a separate fob. This area is alarmed out of hours. The suite is protected by an HFC227 gas extinguishing system.

Back-ups of digital records

8.18 Records stored on network file servers or within database systems are backed up nightly. Backups are stored for an agreed period of time before being destroyed. Schedules for backup and destruction of records are created within the backup software which then

manages the backup and deletion of records. Destruction forms are not completed as the destruction is done automatically as part of the routine of the backup software and on a server rather than file basis. For information stored in Office 365 in the Azure Cloud, this will be controlled by Office 365 backup software policies.

Security of Backup Tapes

8.19   Back up tapes are kept in a locked fire proof safe. Identified individuals have access to the safe and keys for the safe are stored within locked key cabinets.

Password Security

8.20   Passwords for network access are 'strong' in order to decrease the risk of unauthorised access to systems or 'hacking'. Current requirements for these include:

- being a combination of at least 3 character types, i.e. upper case alpha, lower case alpha, numeric or symbols;
- changed regularly; and
- at least 8 characters in length.
- Encryption is enforced on mobile devices by Microsoft Intune Mobile Device Management software

8.21   We ensure passwords are required to access systems and these are changed routinely wherever possible. System time outs are also activated where possible.

8.22   System access logs are maintained and reviewed as appropriate.

Encryption

8.22   The Council requires that encryption is in place on devices on which personal, sensitive or confidential information is stored. This encompasses the following:

- all mobile devices must be encrypted;
- all USB keys must be encrypted keys; and
- all laptops and netbooks must have encryption software loaded.

8.23   MS Intune maintains a database of all Council IT devices. MS Intune is currently being rolled out as part of Office 365.

Evidence:

Appendix 25 - Falkirk Council Financial Regulations - October 2015
Appendix 26 - Information Security Policy

> Extract from the minute from Item 6 – Digital Strategy – Principles and Resources at the Executive Committee meeting held on the 14th May 2019. *Report submitted by the Director of Corporate and Housing Services to be considered by the Committee with the following recommendations:*
>
> *Approve the Information Security Policy and Acceptable Use policies attached and over the coming months these are rolled out across the Council to employees and Members*
>
> *The Executive approved the Information Security and Acceptable Use policies*

Appendix 27 - Acceptable Use Policy
Appendix 28 - DRA - Change of Access Rights Pro-forma.
Appendix 29 - CRT Password Protect Procedures
Mobile flexible working guidance

Element 9:   Data Protection

An authority that handles personal information about individuals has a number of legal obligations to protect that information under the Data Protection Act 2018.

9.1   Falkirk Council is a data controller under Data Protection Legislation (as defined by the Data Protection Act 2018) and is registered as such with the Information Commissioner's office (ICO) with registration number Z7343688.   Falkirk Council Licensing Board is also a data controller, with registration number ZA752398 The Council's Information Governance Manager fulfils the role of Data Protection Officer (DPO) for both authorities and a data.protection email address is available for the public to contact the DPO.

9.2   The Council has a Data Protection Policy in place, along with detailed data protection and confidentiality guidelines for employees and elected members. All employees who handle personal data have to undertake mandatory data protection training which is refreshed annually and which includes a short assessment at the end. Training completion rates are issued to Heads of Service quarterly and reported to the Council's Corporate Management Team annually.

9.3   Falkirk Community Trust is a data controller in its own right, and has data protection procedures in place to cover Falkirk Archives for appropriate public access (see element 7).

9.4   Comprehensive privacy notices for each area of Council business are available on the Council's website, and links to these are provided to the public where possible on web forms, application forms, leaflets, etc. Members of the public are made aware of their right to submit a subject access request on the Council's website. If requesters are unhappy with the response received, the Council offers a review of its decision (similar to an FOI review).

9.5   The Council keeps a record of its data processing activities, based on the information set out in its privacy notices.

9.6   An internal data breach notification process is in place as set out in the Data Security Incident and Data Breach Management Procedure and the DPO keeps a central data breach notification log. Data breaches are reported quarterly by the DPO to the IMWG and serious breaches and lessons learned are highlighted.

9.7   The Council is committed to data protection by design and default. Data protection impact assessments (DPIA) are undertaken when necessary and, once completed, are reviewed by the IMWG. A DPIA screening checklist is also available to help staff assess whether a DPIA is required.

9.8   The Council has developed an information asset register which, amongst other things, highlights whether an asset contains sensitive personal data and whether a DPIA has been completed.

Evidence:

Appendix 30 - ICO's Data Protection Public Register - Certificates Z7343688 and ZA752398.
Appendix 31 - Data Protection Policy
Appendix 32 - Data Protection and Confidentiality Guidelines
Appendix 26 - Information Security Policy

Appendix 33 - Falkirk Archives Data Protection Procedures.
Data Protection Web Pages - https://www.falkirk.gov.uk/services/council-democracy/access-to-information/data-protection.aspx
Appendix 34 - Falkirk Archives Data Protection Form.
Appendix 35 - Data Security Incident and Data Breach Management Procedure
Appendix 36 - DPIA screening checklist

Element 10:   Business Continuity and Vital Records

A business continuity and vital records plan serves as the main resource for the preparation for, response to, and recovery from, an emergency that might affect any number of crucial functions in an authority.

10.1   All Services of the Council are required to have business continuity plans (BCP) in place in the event of any disruption to service delivery. Areas identified as being a critical function will also have their own plan. Each Service has a business continuity lead. Reference to records management arrangements, in particular for vital records, is included in the business continuity template provided to Services.

10.2   All BCPs are reviewed annually and after a substantial event occurs. The Resilience Planning team also carry out annual business continuity exercises which highlight the importance of business continuity and promote the drive to achieve a culture of business continuity management within the Council.

10.3   The Council's Information Asset Register details the information assets held by each service area. It records the information that is held and provides details on the management of that information. This provides a single view of the Council's information assets. It also indicates if the information asset is considered as a key asset to the Council.

10.4   A flowchart is available to assist Services in identifying key assets/vital records and this is recorded in the Information Asset Register.

10.5   The Council has also carried out an assessment on high risk systems to capture to what extent they comply with record management principles and this will allow us to identify areas of weakness and make improvements where we can. This will also assist services when procuring upgrades to their systems as they will know in which areas improvement is required.

10.6   Falkirk Council and Falkirk Community Trust subscribe to Harwell Document Restoration Services. Harwell provides a range of specialist restoration solutions.[2] Both the Council and the Trust are priority users. In the event of any disaster affecting any type of records, large or small scale, Harwell can treat a wide variety of objects to remedy damage caused by fire, water, mould, sewage and infestation".[3]

10.7   A Disaster and Prevention Recovery Plan is currently in place for the Corporate Records Centre and Records Management in Corporate & Housing Services - Governance. Harwell provide a free review of existing disaster plan service and the CRT and Service Records Team will utilise this service and review the plan following advice from Harwell.

10.8   Falkirk Archives has a Recovery Action Checklist and specific Location Plans in conjunction with Museums as part of Falkirk Community Trust's BCP.

10.9   Archives and Records staff have previously undertaken Disaster Recovery Training led by Harwell. The Council has requested details of future training dates and will complete refresher training as soon as possible.

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[2] Harwell Support Services, https://www.harwellrestoration.co.uk/ , accessed 11 June 2020
[3] Harwell Support Services, https://www.harwellrestoration.co.uk/what-can-we-restore , accessed 11 June 2020

10.10 It has been agreed the Records Manager will be part of the team to review BCPs. The Records Manager's role will be to assess if Services are adhering to the requirements of the PRSA and considering records management issues in BCPs.

Evidence:

Appendix 37 - Falkirk Council Contract with Harwell.
Appendix 38 - Falkirk Community Trust Contract with Harwell.
Appendix 39 - Blank Template of Falkirk Council Business Continuity Plans.
Appendix 40 - Is it a Vital Record flowchart.
Falkirk Council's combined Business Classification Scheme and Retention Schedule (BCS)
Appendix 41 - Disaster and Prevention Recovery Plan - Corporate Records Centre and Records Management - Governance
Appendix 42 - Falkirk Community Trust BCP (Blank) - Part 1 Strategy.
Appendix 43 - Falkirk Community Trust BCP (Blank) - Part 2 Recovery Action Checklist.
Appendix 44 - Falkirk Community Trust BCP (Blank) - Part 3 Location Specific Information.

Element 11: Audit Trail

An audit trail is a sequence of steps documenting the processing of a transaction flow through an authority resulting from activities such as communications and requests by individuals, systems or other entities.

11.1 It is recognised that the Council does not currently have adequate procedures in place in relation to audit trails covering all transactions undertaken.

Digital Records

11.2 Currently, most digital records held within the Council are not held in a structured format and have neither an audit trail nor a limit on the copies or versions of the same document. Within directory structures on servers there is also no capability of doing so. The proof of concept that we are currently undertaking should demonstrate that Office 365 can provide effective audit trail functionality.

11.3 A number of Service-specific and corporate systems within the Council do provide audit trails. These are the systems used within Development Services (ePlanning EDRMS), Corporate and Housing Services (Revenues EDRMS), Children's Services (SWIS and SEEMIS) and corporately (Customer First and My Falkirk). The assessment of high risk systems (referred to in element 10) asks Services to identify if their system has the ability to keep an audit trail of changes and this information will help inform the future upgrade or procurement of systems.

11.4 We have identified three main ways of improving on the current position in relation to audit trails:

- First, the implementation of the Business Classification Scheme (Element 4) across all file servers will promote the use of a single standardised filing system for all digital records across the Council. Each Chief Officer of the Council has provided their assurance that the Scheme, once fully developed and rolled-out corporately, will be implemented throughout their Service.
- Secondly, we are investigating options for SharePoint which would enable the Council 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 SharePoint, the use of shared drives and the number of duplicated records will be reduced.
- Thirdly, we will continue to embed a better approach to information management and information risk (e.g. better use of information asset register, role of information assets owners embedded, greater awareness of need for systems to have records management capability to comply with the Act and GDPR).

Paper Records

11.5 There are a number of ways in which paper records are tracked throughout the Council. These include:

- tracer / tracker cards (placed where files have been removed) indicating who has the file and the date they removed the file;
- signing out sheets;
- file registers; and

- bespoke databases.

11.6   Historical paper files held at the Social Work record store are catalogued in a database that includes details such as the shelf location 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.

11.7   All records held at our Corporate Records Centre are managed within our bespoke in house database. The database gives the ability to track the location and movement of any records, regardless of form, including their eventual destruction or transfer to Archives. The database is updated with the appropriate metadata, ensuring that the audit trail of the record is kept. The Governance division also use this database to track the location and movement of their records.

11.8   For the future we will investigate ways in which we can improve audit trails in relation to paper records held outwith the Social Work File Store and the Corporate Records Centre. However, saying this, as we move to ever-more digital way of working, we fully expect our volume of paper records to decrease.

Version Control

11.9   Falkirk Council has guidance on version control which can be accessed by all staff on the Council Intranet Site. SharePoint will also provide version control functionality.

Evidence:

Appendix 06 - Falkirk Council Business Classification Scheme.
Appendix 45 - Finance Service File Tracking Form.
Appendix 46 - Governance - File Movement Database Screenshot.
Appendix 47 - Corporate Records Team - File Movement Database Screenshot.
Appendix 48 - Falkirk Community Trust File Register.
Appendix 49 - Version Control Guidance

Element 12:   Records Management Training for Staff

Staff creating, or otherwise processing records, are appropriately trained and supported

12.1   Falkirk Council has a Learning and Development Policy which outlines our commitment to the learning and development of every employee. Within the Council, the Achievement and Personal Development Scheme (APDS) has been replaced by the "good conversations" scheme which is designed to focus on work related objectives and produce high performing individuals and teams. There are three stages to the conversation between managers and their staff including annual conversations and regular one to one check-ins and Team check-ins to monitor progress with staff.

12.2   The Council recognises that records management is an entirely separate function from general office duties and acknowledges the importance of records management with a Records Manager post and dedicated Corporate Records Team (CRT) on the current establishment.

12.3   Senior management recognise the importance of the continued development of the Records Manager and this is highlighted with the Records Management and Preservation of Archival Records Policy 2020. Funding was recently provided for the Records Manager to undertake a post-graduate Diploma in Archives and Records Management which will be completed by December 2020. The Archivist is also post-graduate qualified and maintains continuing professional development as a Registered Archivist using the Trust's Achievement and Personal Development Scheme (APDS).

12.4   The Records Manager and Archivist are active on a number of external working groups and they regularly attend events and conferences related to records management and archives for continuing professional development and to keep up-to-date with industry best practice.

12.5   The Records Manager and all members of the CRT complete all three stages of the good conversation scheme, based on the requirements of the Records Manager and the CRT as highlighted in the divisional work plan which ties to the Service Plan.

12.6   Falkirk Council uses a competency framework based on the Archives and Records Association (ARA). The framework sets out national standards in record keeping for the UK and Ireland. It identifies key competencies for all those working and volunteering within the archives, conservation and records management sector. This was reviewed in May 2020.

12.7   The competency framework covers records management and archive related posts and agreed competency levels for the following posts:

- Records Manager;
- Corporate Records Administrator;
- Corporate Records Assistants;
- Archivist; and
- Archives Assistants.

12.8   The Records Manager's objectives for the following year have been developed using the divisional work plan for the Information Governance team within Corporate and Housing Services. The responsibilities for the postholders above are also included in the Records Management and Preservation of Archival Policy 2020.

12.9 The records management module within our online learning platform is available to all members of staff and provides key information to enable staff to create and maintain quality records. The module is reviewed annually by the Records Manager and was reviewed June 2020. Reports are generated from the online platform, detailing who has completed the module and this is passed to Managers for information. The module covers topics such as:

- Why records need to be managed
- What the records lifecycle is
- How to name records for easy access
- How to safely dispose of records
- How to ensure compliance with information law

12.10 The Council Intranet, Inside Falkirk, provides dedicated areas whereby staff can access information, policies, procedures and forms on data protection, records management and information security.

12.11 Information Governance updates are provided on the periodic staff newsletter "Inform" which is published on the Council Intranet Site.

12.12 The Records Manager actively engages with staff from all services and attends team meetings to discuss record management issues and provide specific record management related information to help teams comply with the legislation and improve existing processes.

12.13 Senior management are committed to maintaining effective records management and will ensure ongoing adequate resources are available to fulfil the requirements under the PRSA.

Evidence:

Appendix 50 - Good Conversation Template.
Appendix 51 - Competency Framework.
Appendix 52 - Job Description: Records Manager.
Appendix 53 - Job Description: Corporate Records Administrator.
Appendix 54 - Job Description: Corporate Records Assistant.
Appendix 55 - Job Description: Archivist.
Appendix 56 - Job Description: Archives Assistant.
Appendix 57 - Information Governance Work Plan
Appendix 03 - Records Management and Preservation of Archival Records Policy 2020.

Element 13:   Assessment and Review

Regular assessment and review of records management systems will give an authority a clear statement of the extent that its records management practices conform to the Records Management Plan as submitted and agreed by the Keeper.

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

13.2   The remit of the IMWG states that the purpose of the group is, amongst other things, to:

- Promote the effective management of all Council information in all formats throughout its lifecycle, to meet operational, legal and evidential requirements.

- Ensure necessary plans and policies relevant to information management are in place and regularly reviewed (such as the Records Management Plan, the Information Security Policy and the Data Protection Policy).

The Records Manager will undertake an annual review/self-assessment of the Plan and report to the IMWG on this. All services are represented on this group.

13.3   As well as the Council carrying out annual self-assessments, the Records Manager is currently having discussions with the named person under element 2 at West Lothian Council to create a new peer review process. This new partnership will enable both plans to be evaluated by an impartial records management professional and will ensure that what is being stated within each plan is successfully being implemented and improved on where required. This will allow the plans to be scrutinised by someone who already has an insight into the requirements of the Act and knowledge of other organisations' approaches (including best practice). It is the intention that the peer review will be every two years, prior to the Progress Update Review (PUR). It is hoped that development of this new process will be finalised by the end of 2020.

13.4   Both the self-assessment and the peer review will be used to inform our response to the Progress Update Review (PUR), the self-assessment mechanism requested by the Keeper.

13.5   The outcome of the PUR will be reported to the Corporate Risk Management Team and, if considered necessary, the Corporate Management Team.

13.6   As well as reviewing relevant policies and the Plan, the Council participated in a service design exercise focusing on our records management processes led by a service designer within the PTT Team. Falkirk Council used the Scottish Approach to Service Design which "supports and empowers the people of Scotland to actively participate in the definition, design and delivery of their public services". This approach was used to take services through the four stages; discover, define, design and deliver.

13.7   The process encouraged quick, innovative and ambitious thinking in line with our Council of the Future values (responsive, innovative, trusted, ambitious). The initial workshop identified areas of weakness, highlighted by existing and new customers. The second workshop was a fast paced session to consider what customers need from a digital solution and how we could raise awareness of our records management offering. It was agreed that an automated, user friendly solution was required to guide customers through the process.

13.8   This internal service design project supported an existing project with a consultant to consider a corporate digital records management solution. The consultant has taken the insights from the service design workshops and will use these to influence their solution proposals with support from the Council's service designers. The Council is expecting the findings report by the end of August 2020.

Evidence:

Appendix 58 - Information asset risk report to CRMG 27.09.2017

Element 14:   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.

14.1   The Council's Data Protection Policy states:

> *We will ensure that we only share personal data with other organisations when appropriate and that it is shared safely and securely. Information sharing agreements will be put in place where regular sharing takes place.*

14.2   Any new information sharing arrangements for personal data are subject to a data protection impact assessment (DPIA) to ensure compliance with the data protection principles and, where any issues are identified, to ensure that risk mitigation measures are put in place. A screening checklist is available to help staff assess whether a DPIA is required.

14.3   The public is made aware of any sharing of their personal data in privacy notices (see element 9).

14.4   Personal data is most commonly shared with NHS Forth Valley on a data controller to data controller basis. The Council uses the Scottish Information Sharing Toolkit for this purpose, which is mandated for use by Health Boards across Scotland. Information sharing arrangements are documented in the Toolkit's template information sharing agreement.

14.5   The DPO attends the Forth Valley Information Governance Group, along with the DPOs from other Forth Valley Councils and NHS Forth Valley. The Group meets at least quarterly and reviews any new or updated information sharing agreements affecting the members, as well as discussing information governance matters of shared interest.

14.6   The DPO keeps a master list of information sharing agreements to which it is party.

14.7   The Council has created guidance on the secure transfer of information by mail and email. The guidance provides details on what is meant by sensitive personal data, best practice when sending information, extra security measures that can be taken to increase security and also provides staff with a secure email transmission flowchart to help their decision-making. It also details actions that should be taken if a data breach occurs. The guidance was approved by the IMWG on 12th March 2020.

Evidence:

Appendix 31 - Data Protection Policy
Scottish Information Sharing Toolkit, available,
https://www.informationgovernance.scot.nhs.uk/is-toolkit/
Appendix 59 - Guidance on secure transfer of information

Element 15: Public records created or held by third parties

Adequate arrangements must be in place for the management of records created and held by third parties who carry out any functions of the authority

15.1 A number of procedures have been put in place to ensure any contractor carrying out a function on behalf of the Council has appropriate records management procedures in place.

15.2 The terms and conditions provided to contractors for goods and services include specific clauses relating to record management requirements. The Council uses the style wording developed by SOLAR for inclusion in contract conditions. These can be found on the Scottish Council for Archives' website.

15.3 The Council issues specific GDPR clauses in contracts where the contractors are either data controllers and/or data processors in relation to the services delivered. The Council engaged the services of an external law firm to help develop their suite of tender documents to ensure compliance.

15.4 The Council's Contract Standing Orders require that all tender documents should include a provision that, in so far as carrying out the functions of the Council, the contractor will comply with the Act and will indemnify the Council in respect of any claims arising due to a contractor's breach of that Act.

15.5 The main contractor used by the Council to carry out its functions is the Falkirk Community Trust. The Trust is a company limited by guarantee with charitable status and is owned by the Council. On 1 July 2011 the company assumed responsibility for the management and operation of a range of community facing sport, recreation, arts, heritage and library services. By letter signed 21 and 24 May 2013, the Trust has agreed to comply with the Act on terms similar to the style contract conditions referred to in the paragraph above.

Evidence:

Contract Standing Orders (S12, paragraph 24).
Scottish Council for Archives - Records Management Clauses for Contractors
Appendix 60 - PRSA Agreement with FCT.
Appendix 61 – GDPR Clause – Controller
Appendix 62 – GDPR Clause - Processor

List of Appendices

Version Control Table

Version Number	Purpose/Change	Author	Date
3.0	Initial draft to Information Management Working Group (IMWG)	Records Manager	21/05/2020
3.1	Updated document incorporating comments from IMWG members	Records Manager	12/06/2020
3.2	Further Review	Information Governance Manager	20/07/2020
3.3	Reviewed by PTT	Technology and Infrastructure Manager and Improvement Manager	28/07/2020
3.4	Final Review	Information Governance Manger and Records Manager	29/07/2020
4.0	RMP Final	Records Manager	31/07/2020