

**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 2.04**



**Falkirk Council**

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## Introduction

Under the Public Records (Scotland) Act 2011 (“the Act”) Scottish public authorities must 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.

It is important to note that 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 and other legislative requirements, standards and codes of conduct; and
- support transparency and open government.

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.

This Plan covers Falkirk Council and Falkirk Council Licensing Board. For the purposes of this Plan where the word “Service” is used it covers all departments within the Council and the Board.

## Records Management Plan

The Records Management Plan for Falkirk Council and Falkirk Council Licensing Board covers 14 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. [Competency Framework for Records Management Staff](#)
13. [Assessment and Review](#)
14. [Shared Information](#)

The Plan also provides information in relation to procedures put in place to cover the PRSA in relation to the obligations of [contractors](#) carrying out Council functions.

## **Element 1: Senior Management Responsibility**

### **Identify an Individual at Senior Level Who Has Overall Strategic Responsibility for Records Management**

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

Mary Pitcaithly  
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:**

1. Appendix 1 - Covering letter from the Chief Executive of Falkirk Council.
2. Appendix 2 - Covering letter from the Clerk to Falkirk Council Licensing Board.
3. Appendix 4 - Records Management and Preservation of Archival Records Policy 2013.

## **Element 2: Records Manager Responsibility**

**Identify Individual Within the Authority, Answerable to Senior Management, to have Day-to-Day Operational Responsibility for Records Management Within the Authority**

- 2.1 The individual answerable to Senior Management within Falkirk Council and Falkirk Council Licensing Board, and who has operational responsibility for records management within the authority is:

Wendy Barber  
Information Governance Manager  
Governance Division  
Corporate & Housing Services  
Falkirk Council  
Municipal Buildings  
Falkirk

Tel: 01324-506124

eMail: [wendy.barber@falkirk.gov.uk](mailto:wendy.barber@falkirk.gov.uk)

### **Evidence:**

1. Appendix 1 - Covering letter from the Chief Executive of Falkirk Council.
2. Appendix 2 - Covering letter from the Clerk to Falkirk Council Licensing Board.

### **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 2013 is available on both the Council's website and Underground (intranet).
- 3.2 The Policy was updated to take into consideration the requirements of the PRSA. Much of the detail in the 2006 policy was moved into this Records Management Plan. The Policy received senior management approval at the Corporate Management Team on 25 November 2013. The Policy was submitted to The Executive (the Council's decision making process) 14 January 2014 and has received Members' approval.

- 3.4 The 2013 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 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. The Plan will be regularly assessed and reviewed to ensure its effectiveness in terms of records management throughout the Council.”

- 3.5 The Policy, Technology and Improvement Team (“PTIT”) is currently responsible for providing specialist / technical advice in relation to all aspects of managing electronic records. The PTIT is therefore responsible for ensuring that where information is being migrated from one system to another the information is still accessible, authentic, reliable and useable. The development of the Business Classification Scheme (Element 4) will allow for effective management of all records through any organisational change as the Scheme is function based and will not be amended based on any restructuring of Council Services.

- 3.6 At present no procedures or guidance have been produced in relation to metadata within the Council. Some systems will automatically capture some form of metadata but there are no corporate procedures in place when records are being created and therefore no reference to metadata is included in the 2013 Policy. Capturing relevant metadata will be investigated when the Business Classification Scheme is introduced to ensure a corporate approach is developed and established.
- 3.7 At present the Policy does not cover 3.3 and 3.4 above, however, these are areas which will be assessed and reviewed under Element 13.

**Evidence:**

1. Appendix 4 - Records Management and Preservation of Archival Records Policy 2013  
[Records Management and Preservation of Archival Records Policy 2013](#)
2. Extract of Minute of Meeting of Corporate Management Team:

*Noted:*

*(ii) The RMP requires the Council to have a Records Management Policy Statement. CMT approved the policy and agreed it should be submitted to the Executive for Member approval.'*

3. Extract of Minute of Meeting of Executive on 14 January 2014:

*'Decision:*

*The Executive noted the Records Management Plan and approved the Records Management and Preservation of Archival Records Policy.'*

## Element 4: Business Classification

A business classification scheme describes what business activities the authority undertakes – whether alone or in partnership.

- 4.1 Falkirk Council has developed a Business Classification Scheme (the Scheme) covering all functions of the Council which has been arranged into functions, activities and transactions. The Scheme includes reference to the business areas currently responsible for delivering these functions.
- 4.2 Further development of the Scheme will be to include relevant retention and disposal arrangements, therefore including the Retention & Disposal Schedule. The overall Scheme when complete will include the following information:
- function;
  - activity;
  - transaction (type of record / information);
  - retention & disposal information;
  - vital records / location of original and working copy;
  - access rights; and
  - responsible Service.
- 4.3 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.
- 4.4 The Policy, Technology and Improvement division (responsible for ICT related issues) will work with the records management division to produce a directory structure for all file servers across the Council based on the Scheme. Work is ongoing in relation to the development of relevant file naming conventions.
- 4.5 Guidance on the Scheme for managing paper and electronic records will be produced and circulated prior to the Scheme being implemented corporately.
- 4.6 Where the Council has contracted out a function to a third party the Scheme will not be affected as we will ensure this function remains in the Scheme. If a third party would like to use the Scheme then the appropriate function, activities and transactions folders for that specific function can be provided to the contractor to assist with their records management.
- 4.7 Where the Council has functions contracted out at present it has been agreed that they will use the full Scheme.

### Evidence:

1. Appendix 05 - Falkirk Council Business Classification Scheme.

## Element 5: Retention Schedules

A retention schedule is a list of records for which pre-determined destruction dates have been established.

- 5.1 Falkirk Council's Retention & Disposal Schedule was approved by the Council's Corporate Management Team on 11 February 2013. The Schedule is available on both the Council's website and Underground (intranet).
- 5.2 A pro-forma is required to be completed by all Services if they require changes to be made to the Schedule. Changes are only accepted through the Records Management Working Group representatives. The Schedule is maintained by the Records Management unit of Corporate and Housing Services.
- 5.3 As indicated at Element 4, it is proposed that the retention and destruction arrangements for Falkirk Council will be included in future developments of the Business Classification Scheme.

### Evidence:

1. [Retention & Disposal Schedule](#)
2. Appendix 06 - Retention Schedule Updates Pro-forma.
3. Extract from the minute of Corporate Management Team on 11 February 2013:
  - (iv) *The updated retention and disposal schedule circulated to CMT was approved.*
  - (v) *It was agreed that future updates to the retention and disposal schedule can be reported through working group representatives without coming back to CMT.*

## Element 6: Destruction Arrangements

**It is not always cost-effective or practical for an authority to securely destroy records in-house. Many authorities engage a contractor to destroy records and ensure the process is supervised and documented.**

- 6.1 Guidance on destruction of records is available on the Council's Underground (intranet).
- 6.2 Destruction of records occurs at the end of retention periods as set out in the Council's Retention & Disposal Schedule. The Council has a number of destruction arrangements in place. For the purpose of the Records Management Plan destruction or destroyed means either the destruction of paper records or the deletion of electronic records.
- 6.3 Records stored within the Corporate Records Centre are managed by the Corporate Records Team (CRT). The CRT has detailed arrangements in place for the destruction of paper and electronic records. Arrangements must be adhered to at all times. A Destruction of Records Authorisation Form or a Deletion of Electronic Records Authorisation Form requires to be completed and triple 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 Retention & Disposal Schedule. The second 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 retention period the Officer is required to state the reason(s) why. The third signature is required from the Archivist to ensure information of archival value is not being destroyed. Finally, when a record has been destroyed the Officer undertaking the destruction signs and dates the form with the actual date of destruction.
- 6.4 Records stored within Services require a Service Destruction Form to be completed and double signed before destruction. 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. The second signature is required from the Archivist for any records with a review (R) instruction in the Retention and Disposal Schedule 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. Completed destruction forms are passed to the Corporate Records Team to retain.
- 6.5 Where pre-employment and PVG (protection within vulnerable groups) checks are required to be undertaken for new members of staff a PVG certificate is received from Disclosure Scotland. The PVG Certificate can only be retained for 90 days. Basic information from the Certificate (e.g. excluding convictions) is transferred to a Pre-Employment Disclosure / PVG Scheme Clearance Form. This form provides evidence that the Disclosure Certificate / PVG Scheme Record / Record Update received from Disclosure Scotland was confidentially disposed of, with no copies being retained within the Service in line with the requirements of the Data Protection Act 1998. The Pre-Employment Disclosure / PVG Scheme Clearance Form is retained within the individual's personal file.

- 6.6 All shredding undertaken internally is processed by an external company as part of the Provision of a Dry Recyclate Segregation and Resale Service contract. This company is on the Council's Contracts Register and is subject to the Council's tendering process.
- 6.7 Where Services have a large amount of shredding, and do not have the capacity to undertake this work in-house, external companies can be used. Only companies listed on the Council's Contracts Register for the Provision of Confidential Waste Destruction are used. These companies are subject to the Council's tendering process. A certificate of destruction has to be obtained and this is passed to the Corporate Records Team to retain together with the appropriate destruction form.
- 6.8 All destruction forms retained by the Corporate Records Team are scanned and retained in accordance with the Retention & Disposal Schedule.
- 6.9 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.
- 6.10 A record of deletion of mailboxes and private folders of employees who have left the authority is recorded through our HR Forms. The name of the Officer authorising the deletion of mailboxes/folders is recorded at the logging in stage when using HR Forms. This is generally an authorised officer within the Service.
- 6.11 Overall the Council needs to improve on the deletion of electronic records in accordance with the Retention & Disposal Schedule together with ensuring appropriate destruction forms are being completed. With the introduction of a new email system and the implementation of the Business Classification Scheme it is anticipated that the deletion of electronic records will become more manageable and will therefore be in accordance with the Retention & Disposal Schedule.

**Evidence:**

1. Appendix 07 - Guidance on Destruction of Records.
2. [Retention & Disposal Schedule](#)
3. Appendix 08 - Corporate Records Centre Destruction of Paper Records Authorisation Form.
4. Appendix 09 - Corporate Records Centre Deletion of Electronic Records Authorisation Form.
5. Appendix 10 - Corporate Records Team Procedures - Destruction of Paper Records.
6. Appendix 11 - Corporate Records Team Procedures - Deletion of Electronic Records.
7. Appendix 12 - Services Destruction Form.
8. Appendix 13 - Pre-Employment Disclosure / PVG Scheme Clearance Form.
9. Appendix 52 - 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 (the Council) deposits archival records in Falkirk Archives.
- 7.2 A Collaborations Agreement exists between Falkirk Council and Falkirk Community Trust. The Agreement includes a copy of a Service Level Agreement (SLA) between the Council and the Trust in relation to records management and archives. The SLA has been amended to an Operational Agreement (see 7.3). When the Collaborations Agreement is reviewed a copy of the new Operational Agreement will be included.
- 7.3 An Operational Agreement exists between the Council and the Trust which defines 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.
- 7.4 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 and which *inter alia* defines the role and responsibilities of the Archivist in relation to the collections.
- 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 administrative retention period they are listed on destruction forms and approval is sought from both the responsible Service and the Archivist for destruction. This process enables the Archivist to identify individual files which may have archival value and to identify any file series which require an appraisal review.

### ***Transfer Arrangements***

- 7.7 Records identified in the Retention & Disposal Schedule for Archives are transferred from the Corporate Records Centre or direct to Archives from Services. Transfer is undertaken using Council employees and Council vehicles.
- 7.8 Records received in Falkirk Archives are documented on an Entry Form. Routine deposits are listed on a spreadsheet prior to accessioning. The formal accessioning 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.

**Evidence:**

1. Appendix 14 - Collaborations Agreement.
2. Appendix 15 - Operational Agreement.
3. Appendix 16 - Collections Agreement.
4. Appendix 17 - Appraisal & Selection Statement of Practice.
5. Appendix 18 - Appraisal Database (Screenshot).
6. Appendix 19 - Archives Entry Form (Sample).
7. Appendix 04 - Records Management and Preservation of Archival Records Policy 2013.
8. [Records Management and Preservation of Archival Records Policy 2013](#)
9. [Retention & Disposal Schedule](#)

## 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**

8.1 The Council's Financial Regulations includes a section in relation to ICT Security 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 Neighbourhood Services. All new staff should be made aware of the Information Security Policy through the induction process.<sup>1</sup>

8.2 This section of the Financial Regulations outlines the purpose of the Council's Information Security Policy and highlights the responsibilities of Officers in relation to compliance and the requirement for Directors to implement the Policy within their Service.

8.3 The Information Security Policy in place was approved by the Council's Policy and Resources Committee on 31 May 2011. The Policy is due to be reviewed in early 2014. At that point, additional information will be incorporated in relation to paper records and access rights as, at present, the Policy focuses more on electronic records. The obligations of the Council under the PRSA will be highlighted in the updated Policy and what this means for Services and individuals.

8.4 All new employees and Elected Members are asked to sign an Acceptable Use Policy (AUP). 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 of the updated Policy.

8.5 Training on Information Security was provided to all Service Unit Managers (4<sup>th</sup> tier managers) in 2013.

### *Corporate Records Centre*

8.6 Paper records stored in the Corporate Records Centre have restricted access. Only the Corporate Records Team (CRT) and the Service Records Team within Governance have access to the Centre. Keys for the 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.

8.7 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.

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<sup>1</sup> Financial Regulations, pg 6, accessed 13 June 2013  
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- 8.8 Records kept electronically in the Corporate Records Centre 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.
- 8.9 Electronic record retrievals are copied into document retrieval areas (DRAs) for the customer to view on their own computers. 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.
- 8.10 Any changes to access rights of DRAs require a pro-forma to be completed and signed by an authorising officer within the Services 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.
- 8.11 Electronic retrievals of a sensitive or personal nature can be password protected if requested by the customer. The CRT has standard procedures to password protect electronic retrievals.

### ***Falkirk Archives***

- 8.12 Falkirk Archives controls access to the collections in order to protect the collections from damage or 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***

- 8.13 Access to the ICT Suite is controlled and limited to a small number of ICT employees. Access to the area containing the suite is by swipe card and to the suite itself by a separate key fob. This area is alarmed out of hours. The suite is protected by an HFC227 gas extinguishing system.

### ***Security of Backup Tapes***

- 8.14 Back up tapes (as discussed in Element 6) 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***

- 8.15 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.
- 8.16 We ensure passwords are required to access systems and these are changed routinely wherever possible. System time outs are also activated where possible.
- 8.17 System access logs are maintained and reviewed as appropriate.

## ***Encryption***

8.18 The Council requires that encryption is in place where 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.

8.19 Our Policy, Technology and Improvement Division maintain a database to record all Council laptops.

## ***General***

8.20 Various procedures are used throughout the Council in relation to information security, such as:

- locked offices;
- locked cabinets;
- informal procedures and practices;
- password protection; and
- home working.

8.21 It is recognised there are improvements that could be made to information security corporately, in particular in relation to paper records, home working and the use of mobile equipment. These issues will be addressed when the Information Security Policy is reviewed in 2014. At this time we will also investigate the introduction of regular information security reports / updates to senior management.

## **Evidence:**

1. Falkirk Council Financial Regulations - June 2013
2. [Information Security Policy](#)
3. Extract from the minute of Policy & Resources Committee on 31 May 2011:

*PR25. REFERRAL FROM JOINT CONSULTATIVE COMMITTEE – 25 MAY 2011  
With reference to Minute of Meeting of the Joint Consultative Committee held on 25 May 2011 (Paragraphs JCC5, JCC6, JCC7 and JCC9 refer), there was submitted Report (circulated) dated 25 May 2011 by the Director of Corporate and Neighbourhood Services enclosing Reports considered by the said Committee with the recommendations being referred to the Policy and Resources Committee, for approval, namely:- ...*

- *Information Security and Acceptable Use Policies.*

*AGREED to approve the above named policies.'*

4. Acceptable Use Policy
5. Appendix 20 - Information Security Training 2013.
6. Appendix 21 - DRA - Change of Access Rights Pro-forma.
7. Appendix 22 - CRT Password Protect Procedures.

## 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 1998.

- 9.1 Under the Data Protection Act 1998 Falkirk Council is a data controller and is registered as such with the Information Commissioner's office (ICO). The Council's registration can be found on the ICO's Data Protection Public Register - Registration Number Z7343688.
- 9.2 The Council has data protection guidelines in place for employees and elected members as well as a detailed policy on information security. Falkirk Community Trust has data protection procedures in place to cover Falkirk Archives for appropriate public access as well as all employees and Board members.
- 9.3 Members of the public are made aware of their right to submit a subject access request on the Council's website. Until March 2013, there was no central record of requests made to Falkirk Council, but the Scottish Information Commissioner has asked all local authorities to record this statistic as of 1 April 2013 along with FOI statistics. Each Service has its own arrangements for dealing with such requests. For example, the Social Work division within Children's Services has "data access request procedures" in place. Similarly, the Education division within Children's Services has procedures for accessing pupil records and Falkirk Archives has a particular form for use when individuals wish to access personal data.
- 9.4 Customers and other people who provide personal information to the Council usually know how this information will be used, for example to provide them with social work services, or to administer council tax. Where personal information is used for additional purposes, such as providing information about other services available or to prevent fraud, the Council aims to provide a privacy notice which explains how the personal information will be used, processed and shared. For example, the terms and conditions of use of the Council's website include such a privacy notice.
- 9.5 In very limited circumstances, the Data Protection Act 1998 permits the Council to use personal information in a way, or for a purpose, other than the one notified. Brief information is available for members of the public on the Council's data protection page on the website.
- 9.6 Training was provided to all Service Unit Managers in 2013 on dealing with subject access requests. The Council is currently looking at customising an existing DPA online training module for use by all staff.

### Evidence:

1. [ICO's Data Protection Public Register](#) - Registration: Z7343688.
2. [Data Protection Guidelines](#)
3. [Information Security Policy](#)
4. Appendix 23 - Falkirk Archives Data Protection Procedures.
5. [Data Protection Web Pages](#)
6. Appendix 24 - Social Work Data Access Request Procedures.

7. Appendix 25 - Education Services Procedures for Access to Pupil Records.
8. Appendix 26 - Falkirk Archives Data Protection Form.
9. [Terms and Conditions](#)
10. Appendix 27 - Governance Presentation - Information Requests (pg 49-63).

## 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 in place business continuity plans in the event of any disaster. Reference to records management arrangements, in particular vital records has to be included in every plan. The Emergency Planning Team is in the process of advising Services that the minimum requirement with reference to records management in the BCPs should be the following paragraphs:

*The Public Records (Scotland) Act 2011 places an obligation on public authorities to produce a Records Management Plan. Part of the Plan has to include the procedures in place for Business Continuity and Vital Records that are essential to the operation of the authority. Falkirk Council's vital records are listed within the Retention and Disposal Schedule. Therefore, for this Business Continuity Plan and the requirement to identify vital records refer to the above Schedule.*

*In the event of an emergency or disruption and the requirement to reinstate vital records, the point of contact is the (your) Records Management Working Group representative ... They will also act as the contact for Harwell who will assist with any restoration work.*

- 10.2 The Records Management Working Group agreed a flowchart to assist Services in identifying vital records. This flow chart will be used by all Services to advise records management of vital records so this information can be added to the Retention & Disposal Schedule.
- 10.3 Falkirk Council and Falkirk Community Trust subscribe to Harwell Document Restoration Services. Harwell provides a range of “specialist collections management solutions for libraries and archives.”<sup>2</sup> 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 are able to assist in “restoration of collections after fire and flood damage”.<sup>3</sup>
- 10.4 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.
- 10.5 Falkirk Archives has a Recovery Action Checklist and specific Location Plans in conjunction with Museums as part of Falkirk Community Trust’s BCP.
- 10.6 Falkirk Archives has arranged Disaster Recovery Training in November led by Harwell. The Falkirk Archives team and the Corporate Records Administrator are attending this training. The Records Manager will also attend the training if spaces become available.

<sup>2</sup> Harwell Support Services, <http://www.hdrs.co.uk/hss/index.html> , accessed 4 June 2013

<sup>3</sup> Harwell Support Services, <http://www.hdrs.co.uk/hss/products.html> , accessed 4 June 2013

- 10.7 It has been agreed the Records Manager will be part of the team to review BCPs. This team will review all BCPs and the Records Manager's role will be to assess if Services are adhering to the requirements of the PRSA and ensuring the required paragraphs in relation to records management are included in all BCPs.

**Evidence:**

1. Appendix 28 - Falkirk Council Contract with Harwell.
2. Appendix 29 - Falkirk Community Trust Contract with Harwell.
3. Appendix 30 - Blank Template of Falkirk Council Business Continuity Plans.
4. Appendix 31 - Is it a Vital Record flowchart.
5. [Retention & Disposal Schedule](#)
6. Disaster and Prevention Recovery Plan - Corporate Records Centre and Records Management in Chief Executive Office - Governance
7. Appendix 32 - Falkirk Community Trust BCP (Blank) - Part 1 Strategy.
8. Appendix 33 - Falkirk Community Trust BCP (Blank) - Part 2 Recovery Action Checklist.
9. Appendix 34 - 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 at present does not have adequate procedures in place in relation to audit trails covering all transactions undertaken.

### *Electronic Records*

11.2 Currently, most electronic 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.

11.3 A number of electronic systems within the authority do provide audit trails. These are the systems used within Development Services (ePlanning EDRMS), Corporate and Housing Services (Revenues EDRMS) and Children's Services (SWIS and SEEMIS).

11.4 The Council also has a CRM (Customer Relationship Management) system for logging complaints and FOISA requests. This system does have the ability to provide an audit trail of transactions however it is heavily reliant on the user.

11.5 We have identified two main ways of improving this:

- Firstly, 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 electronic records across the Council. This can be introduced relatively easily, and users will be able to adopt this immediately for new files and move existing files into this structure within an agreed timeframe.
- Secondly, we are investigating options for EDRM systems which would enable us to fully comply with the requirements of Element 11 including the requirement for a document audit trail. This project is currently at the early stages but would provide a compliant solution in the longer term.

11.6 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.

### *Paper Records*

11.7 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.

11.8 The bespoke databases are used in Corporate and Housing Services by the Corporate Records Team and the Services Records Team. Each Team logs all file movement out and back in to the centres.

- 11.9 For the future we will investigate ways in which we can improve audit trails in relation to paper records.

### ***Version Control***

- 11.10 At present no procedures or guidance have been produced in relation to version control within the Council when records are being created, amended or updated and therefore no reference to version control is included in the 2013 Policy. Procedures and guidance will be investigated when the Business Classification Scheme is introduced to ensure a corporate approach is developed and established.

#### **Evidence:**

1. Appendix 5 - Falkirk Council Business Classification Scheme.
2. Appendix 35 - Finance Service File Tracking Form.
3. Appendix 36 - Chief Executive Office - Governance - File Movement Database Screenshot.
4. Appendix 37 - Corporate Records Team - File Movement Database Screenshot.
5. Appendix 38 - Falkirk Community Trust File Register.

## Element 12: Competency Framework for Records Management Staff

A competency framework lists the core competencies and the key knowledge and skills required by a records manager. It can be used as a basis for developing job specifications, identifying training needs, and assessing performance.

- 12.1 Falkirk Council has a Corporate Training & Development Policy which outlines our commitment to the training and development of every employee. The Corporate Training Planning System provides a systematic process for identifying job-related training needs. This Achievement & Personal Development Scheme (APDS) is designed to build on these and ensure that development is seen as a continuous process which is jointly owned by managers and employees and is linked to Council priorities. Implementation of the APDS will result in every employee having an Achievement & Personal Development Plan (APDP) which details what they will do to contribute to service delivery.
- 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 2013 (para 5.6). Funding was recently provided for the Records Manager and Corporate Records Administrator to undertake and achieve post-graduate qualifications. The Archivist is also post-graduate qualified and maintains continuing professional development as a Registered Archivist using the Trust's APDS.
- 12.4 The Records Manager and all members of the CRT have a current APDP. These APDPs are based on the requirements of the Records Manager and the CRT as highlighted in the divisional work plan which ties to the Service Plan. The APDPs are reviewed and updated every six months.
- 12.5 Falkirk Council has developed a competency framework based on the competencies currently being developed by the Archives and Records Association (ARA). As the ARA competencies are not finalised it is recognised that the framework for Falkirk Council may require to be amended where and when required. This will be carried out as part of the assessment and review of this Records Management Plan.
- 12.6 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.
- 12.7 The Records Manager's objectives for 2013/14 have been developed using the Service work plan for the Customer & Development Unit within Corporate and Housing Services. The Records Manager's corporate responsibilities are also included in the Records Management and Preservation of Archival Policy (2006 and 2013).

12.8 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:**

1. Appendix 39 - APDP Blank Template.
2. Appendix 40 - Competency Framework.
3. Appendix 41 - Job Description: Records Manager.
4. Appendix 42 - Job Description: Corporate Records Administrator.
5. Appendix 43 - Job Description: Corporate Records Assistant.
6. Appendix 44 - Job Description: Archivist.
7. Appendix 45 - Job Description: Archives Assistant.
8. Appendix 46 - Records Manager's Objectives 2013-14.
9. Appendix 04 - Records Management and Preservation of Archival Records Policy 2013.
10. [Records Management and Preservation of Archival Records Policy 2013](#)

## 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 Falkirk Council will review the Plan by undertaking bi-annual assessments. The Corporate PRSA Working Group agreed the format for assessing and reviewing the Plan. Review will be led by the Records Manager through the Records Management Working Group.
- 13.2 The Records Manager will prepare spreadsheets for each Service to complete as part of the assessment and review. Each spreadsheet will have individual worksheets for each element and specific questions in relation to compliance with PRSA. Services will be required to indicate the percentage they have achieved for each question and the overall percentage will be calculated using a spreadsheet formula.
- 13.3 Services will be required to submit a covering Statement of Assurance with completed spreadsheets to the Records Manager. This was also agreed at the Corporate PRSA Working Group.
- 13.4 The Records Manager will maintain a master spreadsheet which will be populated using the returns from each Service. The information will be collated and analysed, enabling the Records Manager to provide an overall percentage of compliance for Falkirk Council for each Element. This information will be provided to the Keeper and to the Corporate Risk Management Group.
- 13.5 The Records Management Working Group will review the information and look at good practice versus bad practice and offer assistance to Services where records management advice is required.

### **Evidence:**

1. Extract from Action Plan of the PRSA Working Group 24 April 2013:

*'...agreed the format for assessing and reviewing the RMP. Text will be added to the RMP reflecting the assessment and review process.*

*Following submission of the Plan we will work through what information for each element will go into the spreadsheets per Service. This will be done through the RMWG.'*

2. Appendix 47 - Assessment of Compliance Falkirk Council - (Records Manager's Master Spreadsheet - Sample Data in Elements 1, 2, 3 and 6).
3. Appendix 48 - Assessment of Compliance - CEO - Governance (Sample Data in Elements 1, 2, 3 and 6).

## 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 In limited circumstances, Falkirk Council shares information with relevant partner agencies. The public is made aware of this on the data protection page on the website and, where appropriate, in privacy / fair processing notices.
- 14.2 The Forth Valley partner agencies - Falkirk Council, Stirling Council, Clackmannanshire Council, Forth Valley NHS, Police Scotland and Central Scotland Fire Service - have signed up to a new two-tier data sharing framework which is part of the Scottish Accord on the Sharing of Personal Information. The Accord is a national framework for use by agencies across Scotland to improve information sharing.
- 14.3 The first tier is the Forth Valley Accord which was signed in March 2013 and identifies the commitments required by each organisation to enable sharing of personal information. Sign-up and ownership are at the highest level in each organisation. It is a statement of the principles and assurances which govern the activity of information sharing. The Forth Valley Accord provides at paragraph 2.8.1 that all organisations will have a policy document which will make clear their approach to retention, storage and disposal of records, in line with the Public Records (Scotland) Act 2011.
- 14.4 As a second tier, sitting under the Forth Valley Accord will be individual Information Sharing Protocols (ISPs). These protocols will provide specific guidance on data sharing in specific situations. Each ISP will cover a specific area of work and have identified partners. As historic information sharing arrangements come to an end, these will be replaced by new ISPs sitting under the Forth Valley Accord.
- 14.5 Currently, the Council participates in several formal data sharing agreements including the Forth Valley Multi Agency Public Protection Arrangements (due for review August 2013), Forth Valley Antisocial Behaviour Information Sharing Protocol (review in progress), and Falkirk Children's Commission Information Sharing Procedure (due for review May 2014). It is intended that these, and any others due for review, will "migrate" to the new form of ISP in due course.
- 14.6 The Council plans to carry out an audit of its information sharing arrangements to ensure that these are all properly documented, and maintained on a new, centralised information sharing register. It also plans to carry out a review of its use of privacy/fair processing notices to ensure that these are in line with best practice.
- 14.7 Falkirk Council has an Information Security Policy which includes a section on information sharing and all staff are required to comply with this policy. The policy is due to be reviewed in 2014 at which time it will take account of the new Forth Valley Accord.

### Evidence:

1. [Data Protection Web Page](#)
2. Appendix 49 - Forth Valley - Scottish Accord Sharing Personal Information.
3. Appendix 50 - Forth Valley ISP Template.
4. [Information Security Policy](#)

## Contracts

### S3 Meaning of “public records”

- (1) In this Act (PRSA) “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.
- (2) In subsection (1) “contractor”, in relation to an authority, means a person to whom functions of the authority are delegated (whether under a contract or otherwise) by the authority.

- C.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.
- C.2 The Council’s contract standing orders provide that all tender documents provide that, in so far as carrying out functions of the Council, the contractor will comply with the Public Records (Scotland) Act 2011 and will indemnify the Council in respect of any claims arising due to a contractor’s breach of that Act.
- C.3 The Council intends to use the style wording developed by SOLAR for inclusion in PQQs (pre-qualification questionnaires), ITTs (invitations to tender) and contract conditions. These can be found on the Scottish Council for Archives’ website.
- C.4 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 PRSA on terms similar to the style contract conditions referred to in the paragraph above.

### Evidence:

1. Contract Standing Orders (S12, paragraph 24).
2. [Scottish Council for Archives - Records Management Clauses for Contractors](#)
3. Appendix 51 - PRSA Agreement with FCT.

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