Records Management plan

AUDIT SCOTLAND

Contents

Records Management plan Element 1 – Senior Management Responsibility

Element:	One
Title:	Senior management responsibility
Description:	Section 1(2)(a)(i) of the Act specifically requires a RMP to identify the individual responsible for the management of the authority's public records. Identify an individual at senior level who has overall strategic accountability for records management.
Public authority:	Audit Scotland, the Auditor General for Scotland and the Accounts Commission

Introduction to element one

1. The records management policy for Audit Scotland, the Auditor General for Scotland and the Accounts Commission states that the Chief Operating Officer is responsible for the appropriate arrangements for managing our information and records. The Chief Operating Officer is also the Senior Information Risk Officer (SIRO) for our organisations.

2. Diane McGiffen, Chief Operating Officer and SIRO is the named officer for the records management plan.

Supporting evidence

3. The following evidence is submitted in support of our records management plan for element one. Where necessary the supporting evidence has been redacted to remove personal, confidential or information which may impact our information security.

   - Letter to the Keeper of the Records of Scotland confirming Diane McGiffen as the named officer.
   - Copy of the Board minutes approving Audit Scotland's, the Auditor General for Scotland and the Accounts Commission's joint Records Management Plan.

Element 2 – Records Management Responsibility

Element:	Two
Title:	Records manager responsibility
Description:	Section 1(2)(a)(ii) of the Act specifically requires a RMP to identify the individual responsible for ensuring the authority complies with its plan. Identify individual within the authority, answerable to senior management, to have day-to-day operational responsibility for records management within the authority.
Public authority:	Audit Scotland, the Auditor General for Scotland and the Accounts Commission

Introduction to element two

1.   The records management policy for Audit Scotland, the Auditor General for Scotland and the Accounts Commission states that the Corporate Governance Manager is responsible for the day-to-day records management arrangements.

2.   In addition the Knowledge, Information & Technology Governance Group's role is to keep our records management policy and arrangements up-to-date.

3.   The Corporate Governance Manager is Alex Devlin.

Supporting evidence

4.   The following evidence is submitted in support of our records management plan for element two. Where necessary the supporting evidence has been redacted to remove personal, confidential or information which may impact our information security.

   •   Letter to the Keeper of the Records of Scotland confirming Alex Devlin as the named officer with records management responsibility. (see element one evidence for the letter)

   •   Copy of the Corporate Governance Manager's job description and person specification.

Element 3 – Records Management Policy

Element:	Three
Title:	Records management policy statement
Description:	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.
Public authority:	Audit Scotland, the Auditor General for Scotland and the Accounts Commission

Introduction to element three

1. The records management policy for Audit Scotland, the Auditor General for Scotland and the Accounts Commission describes our commitment and arrangements for managing our information and records. The policy statement is supported by a number of key documents such as our staff guidance on records management, our Freedom of Information policy and our Data Protection policy.

2. The records management policy is sent to each person to read, and acknowledge they have read it by MetaCompliance our policy management software.

Supporting evidence

3. The following evidence is submitted in support of our records management plan for element three. Where necessary the supporting evidence has been redacted to remove personal, confidential or information which may impact our information security.

    *   Records management policy.
    *   Copy of the Board agenda, policies covering paper and minutes approving Audit Scotland's, the Auditor General for Scotland and the Accounts Commission's joint Records Management Policy.

Element 4 – Business Classification

Element:	Four
Title:	Business classification
Description:	A business classification scheme describes what business activities the authority undertakes – whether alone or in partnership.
Public authority:	Audit Scotland, the Auditor General for Scotland and the Accounts Commission

Introduction to element four

1. The Audit Scotland, Auditor General and the Accounts Commission's business classification has been business group based since its inception, and is recorded and maintained in our information asset register. This business group classification is also the basis for our records retention schedule.

2. We have decided to revise our business classification to a functional rather than business group basis and have begun developing this. Once completed our records retention schedule will also be developed on a functional basis.

3. Audit Scotland has recently introduced SharePoint technology for managing and sharing information and records across the organisation. Our intranet, called ishare, has been structured along functional lines to avoid having to restructure the information should business groups change.

4. We believe that our current classification scheme meets the requirement for this element and our new classification scheme once fully developed will form the basis for this element at the next submission.

Supporting evidence

5. The following evidence is submitted in support of our records management plan for element four. Where necessary the supporting evidence has been redacted to remove personal, confidential or information which may impact our information security.

   - A copy of our current information asset register

   - A copy of our draft functional business classification scheme which is in development

   - Screenshot of our intranet ishare showing the functional approach to our information.

Element 5 – Retention Schedules

Element:	Five
Title:	Retention schedules
Description:	Section 1(2)(b)(iii) of the Act specifically requires a RMP to include provision about the archiving and destruction or other disposal of the authority's public records. A retention schedule is a list of records for which pre-determined disposal dates have been established.
Public authority:	Audit Scotland, the Auditor General for Scotland and the Accounts Commission

Introduction to element five

1. Audit Scotland, the Auditor General for Scotland and the Accounts Commission has an information and records retention schedule which is overseen the Knowledge, Information & Technology Governance Group.

2. Factors which influence our retention schedule are:-

    - Regulatory and legislative requirements
    - Audit requirements
    - Business / commercial requirements
    - Historical / permanent archive requirements.

    By adhering to our schedule we will:
    - ensure that records are kept for the appropriate period and in an appropriate manner
    - minimise retention while ensuring the information needs of the business are met
    - dispose of records that are no longer needed in an appropriate manner
    - reduce operating costs by only holding the records we require for business purposes
    - ensure that all disposal actions are properly recorded.

3. In 2010 we liaised with Neil Miller, Inspecting Officer, Government Records Branch, National Archives of Scotland on our retention schedule. Neil informed us that it was complete and will be useful when identifying records for permanent retention.

4. With the introduction of SharePoint technology for records management in Audit Scotland the retention periods have been set within the metadata.

5. Once our new business classification scheme has been completed we will change our records retention schedule to a functional basis also.

Supporting evidence

6. The following evidence is submitted in support of our records management plan for element five. Where necessary the supporting evidence has been redacted to remove personal, confidential or information which may impact our information security.

    - Records retention schedule

    - Copy of an e-mail exchange between Audit Scotland and the NAS on our retention schedule.

Element 6 – Destruction Arrangements

Element:	Six
Title:	Destruction arrangements
Description:	Section 1(2)(b)(iii) of the Act specifically requires a RMP to include provision about the archiving and destruction, or other disposal, of an authority's public records.
	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.
Public authority:	Audit Scotland, the Auditor General for Scotland and the Accounts Commission

Introduction to element six

1. Our public records were held mostly on paper before the implementation of SharePoint records management in July 2013. When the operational life of our paper records is at an end they are stored off-site with our archiving and storage company Box-it. Box-it is ISO 9001:2008 and ISO 14001:2004 registered organisation.

2. In accordance with our guide to archiving (see element seven) the Information Asset Owners (IAOs) are provided with reports from our archiving company highlighting boxes containing information, documents and records that are nearing their destruction date. The IAO has to review the content of the boxes and if required either reset their destruction date, authorise destruction or highlight them for transfer to the National Archives of Scotland.

3. If the review finds the records should be destroyed, forms are completed authorising our archive company to destroy the information. Certificates of destruction are received to confirm they have been destroyed.

4. A service provider review was conducted on Box-it in June 2013 to ensure they continued to meet the quality of service and security for our information.

5. In July 2013 we started to implement electronic records management through SharePoint technology. Initial arrangements are in place for managing records, declared in SharePoint, through the life of the record. These arrangements will be continually reviewed in the light of our experience with SharePoint. At this time no electronic record in SharePoint has come to its destruction date.

Supporting evidence

6. The following evidence is submitted in support of our records management plan for element six. Where necessary the supporting evidence has been redacted to remove personal, confidential or information which may impact our information security.

    - Destruction request form

    - Destruction work order summary from Box-it

    - Certificates of destruction

    - Archiving instructions (see element seven)

    - ISO certificates (see element seven)

    - Extract from archiving database (see element seven)

Element 7 – Archiving and Transfer Arrangements

Element:	Seven
Title:	Archiving and transfer arrangements
Description:	Section 1(2)(b)(iii) of the Act specifically requires a RMP to make provision about the archiving and destruction, or other disposal, of an authority's public records.
	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.
Public authority:	Audit Scotland, the Auditor General for Scotland and the Accounts Commission

Introduction to element seven

1. Audit Scotland, the Accounts Commission and the Auditor General archives its paper records and back-up tapes of its electronic information and records offsite with an archiving company called Box-it. Box-it is ISO registered for their document storage, collection, retrieval and confidential shredding.

2. Our electronic records remain live until the point of disposal or transfer to the National Archives of Scotland. They are maintained in-house with copies stored in our disaster recovery servers (different Audit Scotland office/location) and back-up tapes held at Box-it.

3. Procedures are in place for the archiving and disposal of records.

4. Procedures are in place for identifying and transferring records to the NAS.

Supporting evidence

5. The following evidence is submitted in support of our records management plan for element seven. Where necessary the supporting evidence has been redacted to remove personal, confidential or information which may impact our information security.

   - Audit Scotland staff guidance to archiving paper records
   - Archiving request completion guidance for staff
   - Archiving request form (blank and completed)
   - Extract from Box-it's archive database for Audit Scotland records

- Box-it ISO 9001 and 14001 certificates
- Documents for the 2012 transfer of Accounts Commission historical records to the NAS
- Procedure for the transfer of records to the NAS
- Refer to element six for:
    - Destruction request form
    - Destruction work order summary from Box-it
    - Certificates of destruction

Element 8 – Information Security

Element:	Eight
Title:	Information security
Description:	Section 1(2)(b)(ii) of the Act specifically requires a RMP to make provision about the archiving and destruction or other disposal of the authority's public records. An authority's RMP must make provision for the proper level of security for its public records.
	Information security is the process by which an authority protects its records and ensures they remain available. It is the means by which an authority guards against unauthorised access and provides for the integrity of the records. Robust information security measures are an acknowledgement that records represent a risk as well as an asset. A public authority should have procedures in place to assess and contain that risk.
Public authority:	Audit Scotland, the Auditor General for Scotland and the Accounts Commission

Introduction to element eight

1. Audit Scotland, the Auditor General and the Accounts Commission have an Information Security policy which each member of staff must read and adhere to. Staff acknowledge they have read the policy through our key policy management system MetaCompliance.

2. The Information Security policy contains information on security and use of equipment, use of software, passwords, encryption, information management, secure use of encrypted USB flash drives and legal obligations.

3. The Information Security policy is reviewed annually and presented to the Knowledge, Information & Technology Governance Group (KITGG). The KITGG recommend it to the Management Team who in turn recommend it to the Board for approval thereby ensuring oversight and commitment at the highest level for information security.

4. Paper records that are archived are stored offsite with a company called Box-it. Box-it are ISO registered and part of the registration is for security and environmental responsibilities. Records are securely stored in conditions to reduce the likelihood of them being stolen or damaged by fire, flood, vermin and mould. An inspection of Box-its premises was conducted in 2013 to ensure compliance with Audit Scotland's requirements.

5. Internal audits are conducted on our security controls. The last audit conducted by RSM Tenon in 2010 our internal auditors at that time, gave an audit opinion of substantial assurance for our IT security arrangements.

6. BDO LLP our current internal auditors will be undertaking a new internal audit on data security in October 2013, which will be too late to include the outcome in the RMP.

7. Audit Scotland is currently working towards ISO 27001 the Information Security Management standard. To date we have completed a gap analysis against the standard; this was undertaken by BSI. Work is progressing on areas of development. BDO LLP, our internal auditors will undertake an advisory review of our arrangements against ISO 27001 in early 2014.

Supporting evidence

8. The following evidence is submitted in support of our records management plan for element eight. Where necessary the supporting evidence has been redacted to remove personal, confidential or information which may impact our information security.

- Information security policy
- Board minute of approval of information security policy
- Extract from MetaCompliance showing staff confirming they have read the policy
- Box-it ISO 9001 and 14001 certificates (see element 7)
- Audit Scotland's service provider review of Box-it report (see element 6)
- Extract from our internal audit report opinion on IT security controls
- Extract from our internal audit plan 2013-14
- Board members brief on information security

Element 9 – Data Protection

Element:	Nine
Title:	Data protection
Description:	An authority that handles personal information about individuals has a number of legal obligations to protect that information under the Data Protection Act 1998. The Keeper will expect an Authority's RMP to indicate compliance with its data protection obligations.
Public authority:	Audit Scotland, the Auditor General for Scotland and the Accounts Commission

Introduction to element nine

1. Audit Scotland, the Auditor General for Scotland and the Accounts Commission has extensive data protection arrangements in place to protect staff and clients personal information.

2. The data protection policy is approved by the Board and communicated to staff through our key policy management system MetaCompliance. Staff have to acknowledge in MetaCompliance that they have read the policy.

3. The data protection arrangements are managed on a day to day basis by the Corporate Governance Manager and overseen by the Knowledge, Information & Technology Governance Group.

4. Audit Scotland, the Auditor General for Scotland and the Accounts Commission are individually registered with the Information Commissioner.

5. All staff undertake e-learning in Data Protection and Protecting Information level 1. In addition our Senior Information Risk Owner (SIRO) and Information Asset Owners (IAOs) have to undertake Protecting Information level 2 training.

6. The IT Manager is responsible for the electronic security of our information and records. And Box-it has been selected and vendor assessed for their security of our records in archive.

7. A procedure is in place for data subject access requests. This is communicated to the public in our privacy statement on our website.

8. Should there be a personal data loss there is a procedure to be followed.

Supporting evidence

9. The following evidence is submitted in support of our records management plan for element nine. Where necessary the supporting evidence has been redacted to remove personal, confidential or information which may impact our information security.

   - Data protection policy
   - Example MetaCompliance report showing staff have received and read the data protection policy
   - Board minutes approving the DP policy
   - Registrations with the Information Commissioner
   - Privacy notice
   - Data subject access request procedure and form
   - Data loss procedure (current) and draft data incident procedure which will replace the current version
   - Code of data matching practice (for use with the National Fraud Initiative, see element 14)
   - Records retention schedule (see element 5)

Element 10 – Business Continuity and Vital Records

Element:	Ten
Title:	Business continuity and vital records
Description:	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.
Public authority:	Audit Scotland, the Auditor General for Scotland and the Accounts Commission

Introduction to element ten

1. Audit Scotland, the Auditor General for Scotland and the Accounts Commission has in place business continuity arrangements including recovery plans for essential business services. The plan and arrangements is approved by the Board.

2. Our arrangements include a business continuity manual (version 7 as amended at June 2013), continuity plans and a major incident plan. The next version (version 8) of our BCP is at an advanced stage and will be presented to the Board for approval in late October 2013.

3. Staff are informed of our business continuity arrangements at induction and during Business Continuity Awareness Week each year.

4. An internal audit was conducted on our arrangements in August 2012. We received an audit opinion of reasonable assurance. There were a number of recommendations which have been or are being actioned.

Supporting evidence

5. The following evidence is submitted in support of our records management plan for element ten. Where necessary the supporting evidence has been redacted to remove personal, confidential or information which may impact our information security.

   - Extracts from the business continuity manual
   - Minutes of the Board meeting approving our BCP arrangements
   - Extracts from our internal audit

- Introduction to our BCP for new staff during induction
- BCAW staff updates for 2012 and 2013

Element 11 – Audit Trail

Element:	Eleven
Title:	Audit trail
Description:	An audit trail is a sequence of steps documenting the movement and/or editing of a record resulting from activities by individuals, systems or other entities.
Public authority:	Audit Scotland, the Auditor General for Scotland and the Accounts Commission

Introduction to element eleven

1. Audit Scotland carries out work on behalf of the Auditor General for Scotland and the Accounts Commission. Our organisation, which only came into existence in 2000, is small and consists of about 260 staff. The volume of public records we create is very small in comparison with councils, health boards, the Scottish Government and most NDPBs and our record management arrangements reflect this.

2. Most or our records are less than 13 years old and consist mainly of audit reports, audit evidence, correspondence and corporate governance records.

3. Due to the low volume of electronic records they stay in the systems that they were created until destruction. With the introduction of SharePoint, documents declared as records, will be locked to prevent changes and movement thereby retaining the records authenticity.

4. Paper records are put into archive at regular intervals. Paper records can be recalled at anytime by following our archive recall process. An audit trail of the recall is kept by our archive company Box-it on our behalf.

Supporting evidence

5. The following evidence is submitted in support of our records management plan for element eleven. Where necessary the supporting evidence has been redacted to remove personal, confidential or information which may impact our information security.

   - Archiving procedure (see element seven)
   - Archive recall report
   - Records Management - Declaring a record on ishare

Element 12 – Competency Framework for Records Management Staff

Element:	Twelve
Title:	Competency framework for records management staff
Description:	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.
Public authority:	Audit Scotland, the Auditor General for Scotland and the Accounts Commission

Introduction to element twelve

1. Audit Scotland carries out work on behalf of the Auditor General for Scotland and the Accounts Commission. Our organisation, which came into existence in 2000, is small and consists of about 260 staff. We work mainly with other public sector bodies and do not in the normal course of business interact directly with the public. Therefore, our public records are very small in comparison with councils, health boards, the Scottish Government and most NDPBs. Our record management arrangements reflect that we are a relatively new and small organisation that generates few public records.

2. Audit Scotland, the Auditor General for Scotland and the Accounts Commission have a records management policy. The policy commits us to ensuring that staff are trained in records management applicable to their needs.

3. The records management policy is a key corporate policy and is therefore delivered to each member of staff by MetaCompliance our policy management system. MetaCompliance ensures that staff acknowledges that they have read the policy.

4. All staff receives an introduction to records management and our system for holding records by an in-house video. In addition, staff are provided with information and record management guidance on our intranet system - ishare eg staff guide to records management, records retention schedule, transfer of records to the National Archive of Scotland, etc.

5. The Corporate Governance Manager, who has day to day responsibility of records management, undertakes additional development to fulfil the role. This includes records

management development, attending conferences and liaising with NAS/NRS and other public bodies.

6. Prior to initial development for the Corporate Governance Manager, Audit Scotland engaged the professional services of CJ-Information Management Consultancy to review our records management practices and assist with the requirements of the Public Records Scotland Act 2011.

7. Records management development is closely linked and complimentary to development and training in Data Protection, Freedom of Information and Business Continuity all of which are part of the Corporate Governance Managers role in Audit Scotland.

Supporting evidence

8. The following evidence is submitted in support of our records management plan for element twelve. Where necessary the supporting evidence has been redacted to remove personal, confidential or information which may impact our information security.

- Records management policy (see element three)
- Staff guide to records management
- Engagement letter with CJ-Information Management Consultancy
- Corporate Governance Manager's job description (see element two)
- Corporate Governance Manager's appraisal objective on records management.

Element 13 – Assessment and Review

Element:	Thirteen
Title:	Assessment and review
Description:	Section 1(5)(i)(a) of the Act says that an authority must keep its RMP under review. Regular self-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.
Public authority:	Audit Scotland, the Auditor General for Scotland and the Accounts Commission

Introduction to element thirteen

1. Audit Scotland's Knowledge, Information & Technology Governance Group (KITGG) is responsible for ensuring that:

   - our information and records management policies are reviewed at least annually and submitted to Management Team/Board for approval of any changes

   - all staff are aware of our records management practices and are appropriately trained.

2. The KITGG oversee the annual review of our information and records management policies (this will include the review of the RMP in future years).

3. The KITGG have an information risk register which is reviewed 6 monthly. Records management and digital continuity are named risks.

4. A new part of the review process that will be implemented in 2014 will be a records management compliance self-assessment checklist. This new checklist compliments and is in addition to our information risk checklist, information security checklist for Accounting Officers and Board and internal control checklist and certificate of assurance.

5. In 2012 a complete review of our records management arrangements was undertaken by an external records management practitioner and consultant against the requirements of the Public Records Scotland Act and RMP. The consultant found that our arrangements were 75% to 80% compliant. The report was presented to the KITGG; areas identified for further development are being actioned.

6. The Scottish Information Commissioner's compliance team undertook a FOISA compliance visit in November 2012. The compliance assessment report said 'While conformance with the Section 61 Code was not considered in detail, assessors reviewed Audit Scotland's Records Management documents and were satisfied overall with Audit Scotland's records management arrangements. It was noted that the authority has invested in electronic software which provides an organisation-wide approach to records management, document-sharing and business processes, including FOI'.

Supporting evidence

7. The following evidence is submitted in support of our records management plan for element thirteen. Where necessary the supporting evidence has been redacted to remove personal, confidential or information which may impact our information security.

- The Knowledge, Information & Technology Governance Group's terms of reference (August 2013).

- Information management risk register.

- Records management compliance self-assessment checklist.

- Minutes of KITGG (note: the KITGG used to be called the Information Governance Group (IGG)) meeting for 10 May 2012, 16 August 2012 and 25 July 2013.

- Scottish Information Commissioner's compliance assessment report section 61 records management.

Element 14 – Shared Information

Element:	Fourteen
Title:	Shared information
Description:	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.
Public authority:	Audit Scotland, the Auditor General for Scotland and the Accounts Commission

Introduction to element fourteen

1. Audit Scotland, the Auditor General for Scotland and the Accounts Commission are empowered under the Public Finance and Accountability (Scotland) Act 2000 or the Local Government (Scotland) Act 1973 to conduct financial, economy, efficiency and effectiveness examinations on Scottish public bodies. This legislation requires Scottish public bodies to provide us with any information or records to allow us to undertake our work.

2. We also work with other regulatory or inspectorate bodies to efficiently and effectively conduct performance examinations.

3. Our records management policy will apply to all the public records that we are responsible for and we have Codes, Memorandums of Understanding (MOU) and Protocols when working with others. For example our Code of Data Matching Practice 2010 which we use for the National Fraud Initiative (NFI) was developed in conjunction with the Information Commissioner to ensure that our personal information handling arrangements conformed to the requirements of the Data Protection Act 1998. The Information Commissioner endorsed the Code and provided a foreword for it.

Supporting evidence

4. The following evidence is submitted in support of our records management plan for element fourteen. Where necessary the supporting evidence has been redacted to remove personal, confidential or information which may impact our information security.

   - Public Finance and Accountability (Scotland) Act 2000.
   - Local Government (Scotland) Act 1973.
   - Code of data matching practice 2010.

- MOU with the HM Fire Service Inspectorate.

- MOU with NM Inspectorate of Constabulary.

- MOU with NHS Scotland Counter Fraud Service.

- Protocol with the Scottish Government.

- Protocol with the Standards Commission for Scotland.