SSSC Records Management Policy

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Document governance and management

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Contents

1. Introduction

1.1   As a result of its functions and activities, the Scottish Social Services Council (SSSC) creates and receives records which are a valuable resource and an important asset, and also support our legal, fiscal, business and administrative requirements. The systematic management of the SSSC's own records is essential to protect and preserve them as evidence of actions, support future activities and business decisions, and ensure accountability to present and future stakeholders.

1.2   The SSSC recognises the importance of maintaining a corporate memory of events and activities and is committed to providing sufficient staffing, and technical and organisational resources to make sure that requirements for dealing with records can be achieved and maintained.

1.3   The aim of this policy is to define a framework for managing the SSSC's records. It sets high level principles and responsibilities for records management within the SSSC.

1.4   The policy sets out the practices needed to control and manage the SSSC's own records in such a way that, where appropriate, we efficiently and effectively meet the requirements set out in paragraph 1.9 of the policy.

1.5   The specific objectives of the records management policy are:

- to provide a statement declaring records management standards for the administration of the SSSC's records, throughout their life cycle, from planning and creation through to ultimate disposal

- to make sure that records are managed efficiently and effectively and contribute to the SSSC's objectives as set out in its Strategic Plan

- to instil good practice in records management across the SSSC

- to manage the SSSC's records so that they can be used as an effective information source

- to improve the speed and efficiency with which information can be retrieved

- to develop and maintain systems of low cost storage, with appropriate location, with regular and appropriate disposal processes

- to develop information retrieval systems which facilitate access to specific records, and the identification of their relationship with other records

- to make sure that records vital to the overall operation of all parts and levels of the SSSC are identified and preserved

- to make sure that records are managed throughout their lifecycle in the medium most appropriate for the task they perform

- to make sure that all records are protected and kept secure in a

manner commensurate with their value and retention period

- to make sure records of permanent value are preserved, and to maintain and assure continued access to appropriate historical records

- to make sure that definitive records are the responsibility of those parts of the SSSC or persons designated as the Information Asset Owner

- to optimise the use of space for storage purposes

- to support both protection of privacy through data protection and freedom of information services throughout the SSSC

- to support the delivery of SSSC's functions and strategic outcomes.

Scope

1.6 This policy aims to fulfil the requirement for good management of the records which the SSSC creates and receives in the course of administering its own business. The records covered by this policy must meet the legal, operational and archival requirements of the SSSC. Records management is vital to the delivery of our services in an orderly, efficient and accountable manner to present and future stakeholders.

1.7 This Policy applies to records throughout their lifecycle, from planning and creation through to disposal. Parts of the policy, (specifically on retention and storage), apply to the records of the SSSC's predecessor organisation deposited with SSSC for historical purposes.

1.8 The policy covers:

- the requirements that must be met for the records themselves to be considered as a proper record of the SSSC activity

- the scope of the systems and processes required to ensure the capture, integrity, security, retrievability and correct disposal of SSSC records

- staff responsibilities

- an implementation strategy across the organisation

- provision for regular review of the records management policy and its implementation

- all information created or received by SSSC employees in the course of their duties on behalf of the SSSC, preserved in the form of records.

Relevant legislation and regulations

1.9 This policy defines the areas where legislation, regulations, other standards and best practices have the greatest application in the creation of records connected to

business activities. In complying with the following acts, regulations and best practice standards, the SSSC will take into account the organisations' environmental and economic considerations.

- Public Records (Scotland) Act 2011

- Data Protection Act 2018

- The UK General Data Protection Regulation 2018

- Human Rights Act 1998

- Electronic Communications Act 2000

- Freedom of Information (Scotland) Act 2002

- Freedom of Information (Scotland) Act 2002 Code of Practice on Records Management 2011

- Model Action Plan for developing Records Management arrangements compliant with the Code of Practice on Records Management Under Section 61 of the Freedom of Information (Scotland) Act 2002

- Environmental Information (Scotland) Regulations 2004

- Equality Act 2010

- International Standard on Records Management, BS ISO 15489-1

1.10 In addition, certain records will be subject to other legislation covering their particular subject area. Individual functions within the SSSC should make sure that they are aware of the legislation governing their work and its bearing on their record keeping.

1.11 Operation of this policy will be compatible with the SSSC's internal policies and guidelines (current and planned):

- Data Protection Policy

- Digital Security Policy

- Business Recovery and Continuity Plans

- Records Management Strategy and Plan under the Public Records (Scotland) Act 2011 and Progress Update Review Reports

- SSSC Rules

Definitions

1.12 A **record** is information in any medium, created, received and maintained as evidence and information by an organisation or person, in pursuance of legal obligations or in the transaction of business.

1.13   Records can be in a variety of physical forms including:

- paper documents: any paper, book, photograph, microfilm, map, drawing, artefact, chart

- electronic records: held on servers (internal or hosted), magnetic tape, disk or other electronic storage medium, (including word and excel files, databases, images and emails)

that have been generated or received by the SSSC and have been, or may be, used by the SSSC as evidence of the information contained or transaction concerned.

1.14   Records have the following three main **purposes**:

- they are evidence of a transaction and its terms in the event of a dispute or an audit

- they can be used as reference material for the organisation of facts, background, prior actions and ideas to be used in decision making processes

- they enable compliance with legislative or professional requirements concerning the retention of records.

1.15   **Records management** is a series of integrated and embedded systems related to the core processes of the SSSC by which the SSSC seeks to control the creation, distribution, filing, retrieval, storage and disposal of those records created or received by the SSSC in the course of its business.

Ownership of Records

1.16   All records, irrespective of format, (ie both textual and electronic, including emails) created or received by SSSC employees in the course of their duties on behalf of the SSSC, are the property of the SSSC and subject to its overall control.

2. Principles

Principles of good records management

2.1   The guiding principle of records management is to make sure that information is available when and where it is needed, in an organised and efficient manner, and in a well maintained environment. To do this, the SSSC must ensure that records are:

Authentic

It must be possible to prove that records are what they purport to be and who created them, by keeping a record of their management through time. The record keeping system will operate so that the records derived from it are credible and authoritative. Where information is later added to an existing document within a record, the added information will be signed and dated. With

electronic records, changes and additions will be identifiable through audit trails.

Accurate
Records must accurately reflect the transactions that they document.

Accessible
Records must be readily available when needed.

Complete
Records must be sufficient in content, context and structure to reconstruct the relevant activities and transactions.

Comprehensive
Records must document the complete range of the SSSC's business.

Compliant
Records must comply with any record keeping requirements resulting from legislation, audit rules and other relevant regulations.

Effective
Records must be maintained for specific purposes and the information contained in them must meet those purposes. Records will be identified and linked to the business process to which they are related.

Secure
Records must be securely maintained to prevent unauthorised access, alteration, damage or removal. They must be stored in a secure environment, the degree of security reflecting the sensitivity and importance of the contents. Where records are migrated across changes in technology, the SSSC must ensure that the evidence preserved remains authentic and accurate.

3. Roles and responsibilities

3.1 Council

3.1.1 Council is responsible for approval of the SSSC's Records Management Policy, which enables the SSSC to comply with Records Management, Data Protection and Freedom of Information legislation.

3.2 Executive Management Team

3.2.1 The Executive Management Team is responsible for the approval of the SSSC's retention schedule.

3.2.2 The Executive Management Team will receive updates from the Head of Legal and Corporate Governance via the Bi Annual Information Governance Oversight Group Report.

3.3 Head of Legal and Corporate Governance

3.3.1 The SSSC's Head of Legal and Corporate Governance will have the lead management responsibility for records management within the SSSC and will report to the Executive Management Team via the Bi Annual Information Governance Oversight Group Report and the Annual Information Governance Report, and to Council via the Annual Information Governance Report.

3.3.2 The Head of Legal and Corporate Governance will:

- oversee policy for the creation, management and disposal of SSSC records

- make sure that we provide appropriate resources to maintain the records management function across the SSSC

- make sure staff have appropriate knowledge and skills for the task, by regular analysis of training needs and provision of training

- monitor compliance with this policy and the Records Management Strategy and Plan

- receive quarterly updates and annual reports from the Information Governance Coordinator.

3.4 Information Governance Coordinator

3.4.1 Day to day development and implementation of the Records Management Strategy and Plan is delegated to the Information Governance Coordinator.

3.4.2 The Information Governance Coordinator will:

- support SSSC managers and staff by issuing guidance and providing training as appropriate

- monitor proper functioning of records management systems and procedures

- make sure records management systems stay in line with developments in best practice

- administer the records management and registry systems

- liaise with National Records of Scotland as required.

3.5 Operational Management Team and Line managers

3.5.1 It is the responsibility of Operational managers and line managers to make sure that the appropriate security measures are observed for maintaining records containing personal or other confidential information. When scheduled for destruction we must securely dispose of this material. Operational managers and

line managers will:

- familiarise themselves with, and follow, the SSSC's records management procedures and practices and make sure that their staff do likewise

- make sure that, where necessary, staff have appropriate security clearance to do their jobs effectively

- identify staff training needs for records management relevant to their role and arrange for these to be addressed

- for their own areas, oversee the application of retention schedules and provide input into their development

- undertake management and statistical reporting

- make sure records are held in appropriately secure conditions, depending on their classification.

3.6 Staff

3.6.1 Everyone within the SSSC is responsible for making sure that the records they create or maintain comply with the requirements in this policy. Employees will:

- file items promptly and accurately and identify final versions of records

- make sure records can be accessed as needed and are stored in the appropriate location (physical or digital)

- protect security designated information and maintain the appropriate confidentiality of all matters contained in records

- follow closure and disposal procedures

- never attempt to access or amend documents or records outside their area of authority.

Collaborative Platforms and Records Management

3.6.2 Collaborative platforms, such as Teams posts, are not recordkeeping systems and should not be used as such. As soon as a post becomes something that needs to be formally recorded, for example a discussion leading to a business decision, then extra records must be created and stored in SharePoint, MatterSphere or Dynamics.

4. Records management processes

4.1 To achieve the above, the SSSC will implement records management standards, business processes and records management systems which:

- comply with standards and best practices taking into account the SSSC's organisational and economic considerations

- capture evidence of all activities required

- manage the content, context and structure of records securely and reliably

- facilitate the reuse of information contained within records

- enable efficient access to records, irrespective of their location

- provide a single interface to records relating to any particular business activity regardless of the records' media

- retain records for as long as we need them, and in the form required

- retain electronic records on media that permit reliable data migration and/or system modifications

- protect records from inappropriate access and usage

- ensure the security of records vital to the SSSC's main functions

- provide for future system amendments or redesign.

Each department is responsible for developing working procedures for the day-to-day management of their records.

This will be done for both paper and electronic records, by:

- maintaining an appropriate registration, classification and indexing scheme, for all records, including rules on version control

- designating secure record storage for physical and digital records

- maintaining retention schedules for all SSSC records, coupled with regular disposal of records by designated members of staff

- implementing effective back-up procedures and security of electronic records

- giving responsibility to individuals within the SSSC for the various activities necessary to maintain such systems

- providing appropriate training

- developing and implementing an approved Records Management Plan under the terms of the Public Records (Scotland) Act 2011.