Inverclyde council

AGENDA ITEM NO: 7

Report To:	Policy & Resources Committee	Date:	9 August 2022
Report By:	Interim Director Finance & Corporate Governance	Report No:	LS/62/22
Contact Officer:	Iain Strachan Head of Legal & Democratic Services	Contact No:	01475 712498
	Martin Hughes – Information Governance Solicitor		
Subject:	Inverclyde Council and Inverclyde Licensing Board Records Management Plan – Public Records (Scotland) Act 2011		

1.0 PURPOSE AND SUMMARY

1.1 ☒For Decision　　　　☐For Information/Noting

1.2 The purpose of this report is to seek the Committee's approval for the submission of the Council's Records Management Plan to the Keeper of the Records of Scotland. The Records Management Plan also covers Inverclyde Licensing Board, this having been reported to the Board in June. The Records Management Plan needs submitted by 30 August 2022.

1.3 Under the Public Records (Scotland) Act 2011, all local authorities are required to have a Records Management Plan, with the plan having to be agreed by the Keeper of the Records of Scotland. Having a Records Management Plan will help the Council comply with the notable regulatory duties it has around records, information and data, but also support the Council in developing efficiencies and improvements in service delivery.

1.4 If Committee approves submission of the Records Management Plan this will then be assessed by the National Records Office, with any updates being made before it is agreed by the Keeper. Delivery of the new Records Management Plan will be overseen by the cross-service Information Governance Steering Group, with an action plan being specifically developed for this, and regular updates submitted to the Corporate Management Team and Committee.

2.0 RECOMMENDATIONS

2.1 It is recommended that the Committee:-

　　a) approve the proposed Records Management Plan (RMP) on behalf of the Council and its submission to the Keeper of the Records of Scotland, with authority being delegated to the Head of Legal & Democratic Services to make any minor changes to the RMP that might be needed following submission, in order to have the Keeper of the Records of Scotland agree the RMP;

　　b) note that the RMP will also be submitted on behalf of the Inverclyde Licensing Board; and

c) note that the Council's Information Governance Steering Group will oversee delivery of the RMP once agreed by the Keeper of the Records of Scotland.

Alan Puckrin
Interim Director, Finance & Corporate Governance

3.0 BACKGROUND AND CONTEXT

3.1 The Public Records (Scotland) Act 2011 requires all named public authorities to produce a Records Management Plan (RMP) setting out its current arrangements and any necessary improvements to records management practices across the authority. The Council's last submission was in 2015. The Council's previous RMP also incorporated records held by Inverclyde Licensing Board, and the same approach is proposed again.

3.2 Records management is the adoption of procedures and systems that allow control of the information resources of the Council. Records management ensures that records are kept only as long as they are needed for commercial, legislative or administrative purposes; that records of historical importance are identified; and that records are stored appropriately.

3.3 Establishing effective records management arrangements will deliver the following benefits:

- Ensure compliance with the Public Records (Scotland) Act 2011 and other legislative requirements;
- Supporting improvements and developments in service delivery; and
- Support transparency and open government.

3.4 A RMP submitted by a public authority for the agreement of the Keeper of the Records of Scotland must detail the functions of each authority and the types of records created in pursuit of these functions. The RMP must also show what polices are in place for the appropriate storage, retention, disposal, archiving and security of records.

4.0 PROPOSALS

4.1 A public authority must keep its RMP under review, and if the Keeper so requires, carry out a review of the plan by a specified date. In April 2022, the Keeper of the Records of Scotland requested that the Council submit its updated RMP by 30 August 2022.

4.2 Since April, the Information Governance Steering Group (IGSG), being a cross-service group of relevant Council officers, has been preparing an updated RMP on behalf of both Inverclyde Council and the Inverclyde Licensing Board. The previous RMP was submitted by the Council in 2015.

4.3 On 23 June, the Inverclyde Licensing Board granted delegated authority to its Clerk to finalise the RMP on its behalf, in consultation with the Chair, and then arrange for its submission.

4.4 The RMP relates to records throughout their lifecycle, from creation and acquisition to archive and destruction. It encompasses all records across all Council service areas. As noted above, the plan also incorporates records held by Inverclyde Licensing Board.

4.5 The IGSG has consulted relevant service areas on the proposed RMP and this is submitted for approval by the Committee. Once submitted, the RMP would be effective from 30 August 2022 and will be the subject of ongoing review, overseen by the IGSG.

4.6 Following submission to the Keeper of the Records of Scotland, the National Records of Scotland (NRS) assessment team, on behalf of the Keeper, will consider the RMP and produce an Interim Report. This Report will be issued to the Council and the Inverclyde Licensing Board, and contain the Keeper's initial consideration of the RMP and provide an opportunity for correction and clarification of any points raised by the assessment team. The Report also enables the NRS assessment team to suggest ways in which the RMP may be strengthened. The Council has

been advised that it may take several months before the NRS are in a position to issue the Interim Report.

4.7 Following the issue of the Interim Report, and any updating to the RMP, it will be finalised, with the assessment team issuing a Final Report to the Keeper for their consideration, and hopefully their agreement of the RMP. Once agreed, the RMP will be kept by the Keeper for reference and an acknowledgment that the RMP has been agreed will be published on the NRS website. The Keeper may identify areas of improvement and in respect of which the Council would put in place an action plan. The Council will, in any event, create a new operational action plan to ensure delivery of the RMP, which will be overseen by the IGSG, with progress being reported regularly to the Corporate Management Team.

4.8 A copy of the proposed RMP is annexed to this report in Appendix 1.

5.0 IMPLICATIONS

5.1 The table below shows whether risks and implications apply if the recommendations are agreed:

SUBJECT	YES	NO	N/A
Financial		X	
Legal/Risk	X		
Human Resources		X	
Strategic (LOIP/Corporate Plan)		X	
Equalities & Fairer Scotland Duty		X	
Children & Young People's Rights & Wellbeing		X	
Environmental & Sustainability		X	
Data Protection	X		

5.2 **Finance**

At this time there are no direct financial implications. This may change upon specific responses to developing and improving procedures and will be identified separately.

One off Costs

Cost Centre	Budget Heading	Budget Years	Proposed Spend this Report	Virement From	Other Comments
N/A					

Annually Recurring Costs/ (Savings)

Cost Centre	Budget Heading	With Effect from	Annual Net Impact	Virement From (If Applicable)	Other Comments
N/A					

5.3 **Legal/Risk**

This is a legal requirement placed on the Council to submit the RMP by the Public Records (Scotland) Act 2011. The RMP Plan will also help ensure the Council complies with its various regulatory and legislative requirements related to records, such as the Data Protection Act 2018 and the Freedom of Information (Scotland) Act 2002.

Likewise, the RMP will help ensure the Council is able to mitigate the notable risks associated with poor management of records, information and data, these risks being operational, legal, financial but also to the Council's reputation.

5.4 **Human Resources**

There are no direct Human Resources implications arising from this report.

5.5 **Strategic**

The RMP will help secure compliance with a number of Council policies, around records, information and data management, and in turn help support delivery of the Council's strategic objectives. However, it will not of itself directly deliver objectives in the Local Outcome Improvement Plan or the Council's Corporate Plan.

5.6 **Data Protection**

The Data Protection box has been stated as applicable, at 5.1, given the direct link between the RMP and the Council's data protection duties. However, as noted below, a Data Protection Impact Assessment has not been carried out, as no actual data processing in is involved in this report or the drafting of the RMP.

Has a Data Protection Impact Assessment been carried out?

	YES – This report involves data processing which may result in a high risk to the rights and freedoms of individuals.
X	NO – Assessed as not relevant as this report does not involve data processing which may result in a high risk to the rights and freedoms of individuals.

6.0 CONSULTATION

6.1 Extensive consultation took place with relevant officers who form part of the IGSG, together with the Corporate Management Team and the Chair of the Inverclyde Licensing Board.

7.0 BACKGROUND PAPERS

7.1 N/a.

Inverclyde Council and Inverclyde Licensing Board

Records Management Plan

Version 2.4
Produced by:
Information Governance
Inverclyde Council
Municipal Buildings
GREENOCK
PA15 1LX
2022

INVERCLYDE COUNCIL IS AN EQUAL OPPORTUNITIES EMPLOYER

THIS IS AVAILABLE ON REQUEST, IN LARGE PRINT, BRAILLE, ON AUDIOTAPE, OR COMPUTER DISC.

DOCUMENT CONTROL

Document Responsiblity

Name of Officer	Title	Service
Head of Legal & Democratic Services	Record Management Plan	Legal and Democratic Services

Change History

Version number	**Date**	**Comments**
Version 1.0	12 November 2015	Final version
Version 2.1	23 May 2022	Draft version or comments from IG/Legal Services
Version 2.2	6 June 2022	Comments from IS/IGSG
Version 2.3	24 June 2022	Revised version
Version 2.4	20 July 2022	Approved by CMT
Version 2.5	26 July 2022	Final updates by Head of Legal & Democratic Services

Distribution

Name/ Title	Date	Comments
Legal & Democratic Services		

Distribution made to others on request

Review

Review Date	Person Responsible	Service
August 2025	Information Governance Team	Legal and Democratic Services

Copyright

Contents

Introduction

The Public Records (Scotland) Act 2011 ("the Act") came fully into force in January 2013. The Act obliges Inverclyde Council and Inverclyde Licensing Board and other public authorities in Scotland to prepare and implement a Records Management Plan (RMP).

The RMP sets out the proper arrangements for the management of records within the Council. The plan is agreed with the Keeper of the Records of Scotland (the Keeper) and is reviewed by the Council. The scope of the Plan applies to all records irrespective of the technology used to create and store them. Records management is the adoption of procedures and systems that allow the most efficient control of the information resources of the Council. Records management ensures that records are kept only as long as they are needed for commercial, legislative or administrative purposes; that records of historical importance are identified; and that records are stored in the most cost-effective way.

Good records management is essential for any corporate body to function effectively. Inverclyde Council's and Inverclyde Licensing Board's records are essential for us to carry out our jobs, to provide information for decision making and evidence our activities.

Our records are an essential part of enabling the Council and Inverclyde Licensing Board to achieve priority outcomes that reflect what is most important to the people and communities of Inverclyde, as set out in Inverclyde Council's Corporate Plan. Effective management of corporate information allows fast, accurate and reliable access to records, ensuring the timely destruction of redundant information and the identification and protection of vital and historically important records.

Inverclyde Council and Inverclyde Licensing Board will maintain records management policy, procedures and practices across all Services of the Council (Services). These will be based upon the requirements of the Public Records (Scotland) Act 2011 and National Records of Scotland guidance for local authorities in relation to records management best practice and principles.

Records Management Plan

The Records Management Plan for Inverclyde Council and Inverclyde Licensing Board is based on the Keeper's published Model Records Plan and covers 15 Elements:

1. Senior Management Responsibility
2. Record 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
15. Work with Contractors

Guidance on each of these elements can be found here.

Inverclyde Council and Inverclyde Licensing Board have provided the Keeper with evidence of policies, procedures, guidance and operational activity on all elements of the plan.

This version of the Records Management Plan is effective from #### 2022. This plan will be continually reviewed and updated.

Elements 1 – 3: Responsibility & Record Management Policy Statement

The senior responsible officer within Inverclyde Council for records management is:

Head of Legal & Democratic Services
Inverclyde Council
Municipal Buildings
Greenock
PA15 1LY

Records Management responsibility for the Inverclyde Licensing Board has been delegated to Inverclyde Council. The senior responsible officer within Inverclyde Licensing Board is:

Iain Strachan
Head of Legal & Democratic Services and Clerk to the Licensing Board
Inverclyde Council
Municipal Buildings
Greenock
PA15 1LY

The point of contact for the day-to-day and operational records management within Inverclyde Council and Inverclyde Licensing Board is:

Martin Hughes
Solicitor (Information Governance)
Legal & Democratic Services
Inverclyde Council
Municipal Buildings
Greenock
PA15 1LY

Records Management Policy

The Council's commitment to effective records management is set out in the Council's Record Management Policy. The Council continues to implement this policy.

The Records Management Policy (Appendix 1) was originally approved at the Council's Policy & Resources Committee on 24 March 2015. The Policy highlights the importance placed on records management within the Council and the responsibilities placed on its staff. A review of the Records Management Policy will be progressed by the Information Governance Steering Group (IGSG) as part of the updated Records Management Plan process.

All Council reports and policies once approved by the appropriate formal process are made available to staff via the Council's communication channels; email, Inverclyde Council Online (ICON) and to the public on the public facing website.

Revised Policies and Guidance

The Council has continued to revise various policy and guidance documents since our last formal submission to the Keeper. Since our last formal RMP submission in 2015, the following policies/guidance have been approved, please see the links below:

- The Policy for the Retention and Disposal of Documents and Records Paper and Electronic.
- The Data Protection Impact Assessment Guidance and Template
- The Data Protection Policy.

The following can also be found at Appendix 2-

- The Version Control and Naming Guidance
- The Subject Access Request Guidance
- The Clear Desk Policy
- The Information Classification Policy
- The Business Classification Scheme

The following policy is being amended and will be presented to the Council's Policy and Resources Committee for approval later in 2022:

- Acceptable Use of Information Policy

Element 4: Business Classification

In our last formal submission, no Business Classification Scheme (BCS) was in place for Inverclyde Council. We are pleased to confirm that BCS has now been successfully introduced by the Council.

As part of BCS Services were required to transfer data to new file drives, with the Council's Policy for the Retention and Disposal of Documents and Records Paper and Electronic then being applied, old file drives have now been decommissioned.

In order to carry out BCS, the Council identified two stages to help progress the implementation of BCS. Stage 1 related to Services having file structures in place for new drives and stage 2 related to the migration of data. To complete stage 1, the Council carried out the following steps:-

- Services submitted BCS diagrams to the Information Governance team
- Services reorganised their network folders/paper systems where they store documents to reflect corporate BCS.
- Services migrated files from old drives to the new BCS structure.

We can confirm that Services have completed stage 1. In relation to stage 2, this is under ongoing review by Services. BCS Implementation has been a standing item on the agenda of our Information Governance Steering Group (IGSG), which is responsible for the oversight and management of information governance and record management responsibilities.

Element 5:   Retention Schedules

Retention Schedules are included within the Council's Policy for the Retention and Disposal of Documents and Records Paper and Electronic (Retention/Disposal Policy). The Retention Schedule was developed with reference to the Retention Guidelines for Local Authorities, produced by the Information and Records Management Society and in collaboration with Services.

The Council continues to base its Retention/Disposal Policy on the model retention and disposal schedules produced by the Scottish Council on Archives.

The Council was required to revise and update its Retention/Disposal Policy to reflect the General Data Protection Regulations (GDPR) and the Data Protection Act 2018. The Council's updated Retention/Disposal Policy was approved by the Policy and Resources Committee in September 2020.

Each Service of the Council has appointed a records management representative. The role of the representative is to advise their Service in relation to retention, disposal, archiving and to ensure this complies with effective records management outlined in our Retention/Disposal Policy. The IGSG monitors the individual approaches adopted by Services in relation to their records management processes.

Like most local authorities, the Council is complying with any requests for information as part of the Scottish Child Abuse Inquiry (SCAI) and therefore some Social Work Records have not been destroyed as per the Council's Retention/Disposal Policy.

Element 6:   Destruction Certificates

Records may be disposed of by archiving for permanent preservation or by destruction. This guidance is available in our [Retention/Disposal Policy](#).

Records selected for destruction are destroyed in accordance our Destruction Certificates model - Disposal/Destruction of Records Authorisation Form. Destruction Certificates involve a responsible officer within individual Services completing a paper Destruction Certificate.

The Destruction Certificate includes the date of destruction, the manner of disposal either by destruction or by transfer, description of records and the name of the Officer.

Destroying Paper/Physical records

For destruction of bulk physical records, the Council has used an external supplier for the bulk destruction of paper records on an ad-hoc basis. Destruction takes place on-site and is a supervised process. The Council also uses on-site confidential waste shredders which ensure that paper is securely destroyed.

Destroying Electronic records

As advised previously, in order to address the destruction of electronic files, the Business Classification Scheme was introduced as a new system for destroying old electronic records and to assist with the provision of new storage spaces for ongoing/new electronic records. The Council is currently considering its approach in relation to storing long-term electronic records and is hopeful that it can work towards a long term system for digital preservation.

The Council is aware that that we have committed to provide an update in relation to implementing an Electronic Document and Records Management System (EDRMS). We can advise that a business case for a corporate roll-out for EDRMS is being developed and will be submitted to the Council's Corporate Management Team in October 2022. This will introduce a new system to assist Services with complying with destruction processes.

The Council is also aware that there will be paper and electronic records that EDRMS will not be able to address. We are currently considering solutions to adopt a pragmatic approach towards these current records with Corporate Management Team oversight to ensure that Services are complying with record management responsibilities.

Element 7:   Archiving and Transfer

Archiving and transfer arrangements are detailed within the [Retention/Disposal Policy](#). The Council's historic archive repository is the Inverclyde Archives.

Inverclyde Archives
Watt Institution
15 Kelly Street
Greenock
PA16 8JX

Records selected for permanent preservation are transferred to the appointed officer within individual Services responsible for archiving records. The Policy provides that officers manage the records and complete the Archiving Certificate. Records identifiable for permanent retention are currently stored at the Watt Institution, within office premises and also in the Greenock Municipal Buildings (GMB) basement. Archiving is a priority on the IGSG's Action Plan.

The Council also has a storage facility at Unit 5, Kingston Business Park, Port Glasgow where hard copy records and museum artefacts are being stored. Fire resistant secure storage units are in the GMB and these are being assessed for suitability to store permanent and longer-term retention records. The Council has taken steps to address the preservation of permanent records as part of the Watt Complex Refurbishment Project Development. The Archivist position has now been made permanent who helps to oversee archiving responsibilities for the Council.

GMB Basement Refurbishment Work

In relation to the GMB Basement Stores, work is now complete and storage space has been allocated to certain services. Alterations work has also been made to an area of the Finance wing and further storage space has been made available which is being used by Services. We can advise that in relation to the refurbishment work, more storage space has been allocated for services to use. A museum store at the GMB basement is now able to be used along with nearby storage space previously used by Health & Social Care Partnership (HSCP). Further alterations work have been carried out to an area of the Finance wing.

In relation to long-term provision in place for physical records, structural work in relation to floor joists that was required to achieve a further archives store at the Watt Institution has been completed. We can confirm that further funding has been secured to refurbish and rack the space to create further suitable storage space. The refurbishment works have a building warrant and tender report with more

works commencing shortly. Refurbishment of the Library and Museum Services store will progress next subject to funding to remove the hazardous materials.

The Council is aware that it has made previous commitments on carrying out a feasibility study on the current external archives storage and work to produce 'Proper Arrangements' guidance.

Unfortunately, as advised previously the Watt Institution was closed during the COVID 19 pandemic and these matters have been impacted. The Council is however aware and is currently taking steps to reconsider proposals to help progress current archiving arrangements.

Element 8:   Information Security

The Council continues to have Public Sector Network (PSN) Accreditation which was first introduced in December 2014.

The Public Services Network provides the Council with secure access to a number of services provided by National and Regional Government departments; Registers of Scotland (Births, Deaths and Marriage records), Department of Work and Pensions (DWP), Violent and Sex Offender Register as well as providing secure interdepartmental communications via GCSX Email. The Council has been accredited as a Cyber Essential Plus Organisation.

The Council continues to adopt the UK Government Secure Policy Framework which is the basis on which we secure our network. The Council has a dedicated ICT team who have responsibility for the ongoing management and delivery of ICT including the provision of strategic advice and support. The Council also adopts the Scottish Government's Cyber Action Plan.

The Council uses an Acceptable Use of Information Systems Policy which is available to all staff. This policy applies to all Council employees and elected members and covers the use of the internet and email, as well as equipment security and working from home on Council business. Inverclyde Council now operates a hybrid working model, on a pilot scheme basis, and has issued information security guidance to all staff on use of systems when working from home (Appendix 2).

ICT ensure that the Council's systems maintain the appropriate security and integrity for its data: all systems are password protected, staff are required to change passwords regularly and portable equipment and portable media is encrypted and there are restrictions on using non-council external devices.

Information Security is a core training requirement for Heads of Service, Service Managers and Service Team Leaders. All staff must complete mandatory information security awareness training which includes information governance and records management. New starts must complete security training on first day of work before they are given full access to the Council's ICT system.

Employee terms and conditions have been updated and oblige staff to comply with Council policies and procedures. This includes the Employee Code of Conduct which has reference to the Data Protection Act 2018, Computer and other Systems, use of Council Intranet, Internet, Email, Confidentiality of Information and Managing Information.

The Council has developed a data/information classification system which identifies owners for critical information systems. An Information Asset Register has been developed which enables information

asset owners to monitor and apply controls to the information they are responsible for. The Council continues to update its security classifications in line with the UK Government Security Classifications.

As part of the Council's GDPR Implementation Plan, a Data Protection Breach Management Protocol (Appendix 1) was introduced. In addition, all data breaches are now recorded in the Council's Data Breach Register. In addition, the Council has committed to implement in full the requirements of the Scottish Government's Cyber Action Plan in line with their Key Action Timeline.

Element 9:   Data Protection

In order to deliver services to the communities and citizens of Inverclyde, the Council requires to gather and process personal data about residents, staff and other individuals. Inverclyde Council is a data controller and is registered with the Information Commissioner's Office. The Council's registration can be found on the ICO's Data Protection Public Register website ICO website Registration Number Z5004355. The Inverclyde Licensing Board holds a separate registration at ZA151373.

The Council's Data Protection Officer has responsibility for monitoring data protection compliance throughout the Council. Legal & Democratic Services are responsible for providing routine advice on Data Protection to services throughout the Council and other officers within services who co-ordinate responses to Subject Access Requests made to that service.

Members of the public are made aware of their right to submit a Subject Access Request on the Council's website. The Council has a Data Protection Policy in place for employees and Elected Members and an Acceptable Use of Information Systems Policy.

In addition, there is a Protocol in place which details steps to be taken when an employee believes a breach of data protection has or may have taken place. The Employee Code of Conduct states all employees are obliged to comply with the terms of the Data Protection Act 2018 with all staff undertaking training on Data Protection and Confidentiality of Information/Managing Information.

Council's GDPR Implementation

In order to action changes required for GDPR and the Data Protection Act 2018, the Council progressed a GDPR Implementation Plan and took the following steps:-

- a Data Protection Officer was appointed in February 2018.
- the Council created an Information Governance Team in March 2018 which is the principal point of oversight for record management responsibilities and information governance matters.
- the Council implemented a Data Breach Management Protocol; a Data Breach Register; and published Data Sharing Agreement Templates.
- the Council introduced guidance documents such as Privacy Notice Template and Guidance; an Employee GDPR Guide; an e-learning GDPR module which is mandatory for all employees; and Elected Members GDPR Guide (Appendix 2).
- The Council's Corporate Privacy Notice has been updated, together with Service specific Privacy Notices, and these are available on the Council's website.
- Data Protection Impact Assessment Guidance and Template was approved by the Policy & Resources Committee on 26 March 2019

- Subject Access Request Guidance has been created.
- Additional e-learning modules have been developed focusing on Data Breaches and how to carry out DPIAs. These modules are available to all staff.

Element 10:   Business Continuity and Vital Records

The Joint Civil Contingencies Service (CCS) is a shared service hosted by Renfrewshire Council and working, in addition to Renfrewshire, across Inverclyde, East Renfrewshire and West Dunbartonshire Councils. The CCS supports each Council's discharge of statutory duties under the Civil Contingencies Act 2004 and associated legislation/regulations. These duties include ensuring the development and testing of business continuity plans. Service Business Continuity Plans are maintained for each service area and are complemented by an overarching Corporate Business Continuity Plan.

These Business Continuity Plans are normally reviewed on an annual basis, or following any incident that necessitates plan activation. The Council has a dedicated Council Resilience Management Team (CRMT) consisting of senior directorate representatives, that meets quarterly to coordinate and develop contingency planning arrangements and Business Contingency is a standing agenda item. The CRMT may also convene during an emergency to ensure the Council's response to an emergency is effectively coordinated, with identified Essential Services prioritised accordingly. This has been demonstrated most recently with meetings of varying frequency throughout the Covid Pandemic reflective of the level of response / consideration required.

The CCS delivers an annual training programme, which is agreed in conjunction with the Joint Management Board, which comprises the Chief Executives of the four participating Council areas (meeting quarterly). Training and exercise elements throughout the year include bespoke response role training for officers and response teams at strategic, tactical and operational level, and 'call cascade' exercises, to test the accuracy of contact details in plans.

An Information Asset Register (IAR) Management System has been developed in-house to allow Services to maintain their respective IARs more effectively and efficiently. In addition, as a result of the UK's exit from the EU, the IAR has been updated to capture processing of personal data out-with the UK.

Business Continuity Plans continue to be reviewed annually. The standard review process for 2020 was affected by the response to the COVID 19 Pandemic. However, existing plans were developed to reflect requirements and adapt to the significant challenges that continue to be placed on the Council. A full systemic review of Business Continuity Plans took place in 2021/22 adopting key learning from the Covid pandemic response and accounting for such factors as improved resilience from remote working arrangements. Additionally and a comprehensive consideration to the identification and prioritised delivery of Essential Services in incidents of varying scale. This learning and adaption process will continue in 2022 to account for further learning from incidents, including the Scottish Government's Storm Arwen Review.

Element 11:   Audit Trail

In our last formal submission, the Council did not have a procedure in place in relation to audit trails. The Business Classification Scheme is now operational which has assisted the Council in carrying out its audit functions. In addition to this, Document Version Control and Naming Convention (Appendix 1) came into place and also assists the Council in providing an internal audit process.

Use of Electronic Systems for Audit Purposes

The following electronic systems are used by individual Council Services which are able to provide audit capabilities.

SWIFT Social Work Information System – SWIFT has an inbuilt restriction of access system and can show significant events that have taken place to a record i.e. which employee has modified/added to a record. Modified notes on SWIFT can show who has changed a note but not what they have changed which is separately picked up through the Business Objects Reporting tool. Please note that the SWIFT system is due to be replaced by the end of 2023.

NORTHGATE Benefits and Revenues System – Access is restricted by an inbuilt system function within Northgate. The access levels that staff are allocated are dependent on their job title and grade. A monthly review of user accounts and permission levels is carried out to ensure that user access to the system and data is in line with users' job roles. The Northgate system audit trail is able to report details of actions taken, the user name of the person who carried out the action and the date and time that the modifications took place.

SEEMIS (Scottish Educational Establishments Management Information System) - SEEMiS is the provider of a wide range of systems used by Education Services. Access to SEEMIS is controlled by the School Business Officer/Coordinator and key staff in Education HQ who ultimately have the ability to start/stop accounts and also control the level of access that a person is given.

The access levels that staff are allocated are dependent upon their role within, or supporting, Education Services. Access to SEEMIS is restricted to the establishments that a person is working with and to particular parts of the SEEMIS system. The School Business Officer/Coordinator audit the accounts on a regular basis, making changes as and when staff join or leave an establishment.

CIVICA - The Council currently use Civica360 ERDMS for Revenues & Benefits and HSCP Services. As part of the upgrade to the new version of CIVICA, this will enable the automation and secure deletion of documents and data across all Service modules. Access to CIVICA is controlled by individual

Services. Service Administrators (directed by Service Managers) are responsible for setting up new users and providing access based on the user role, depending on job function and responsibilities.

With regards to the audit process capabilities. CIVICA keeps a full history of user activity. If the user has been given the required permissions for document access to view data changes, the user will have access to view the audit history against the claim, claimant, property, document etc.

For any highly sensitive information, for example, Child Protection, High Risk Offenders within the Criminal Justice system, with only specific users able to gain access confidential files.

Idox – This is used by Public Protection and Regeneration and Planning. Service Administrators are responsible for providing access to users based on the user role, depending on job function and responsibilities. The audit trail provides a history of updates to and deletions of records; specifying the user, date of change and screen changed but not a record of the changes to text.

Audit trails - Paper

The following audit trails are in place for some paper records:

- The Document Version Control and Naming Convention (Appendix 1)
- HSCP Advice Services use a card system to trace when a file is removed and when it has been returned.

Element 12:   Competency Framework

Information Governance Framework

The Council does not have a dedicated Records Manager post nor dedicated Corporate Records Team. The Council does have an Information Governance team, with a Data Protection Officer, an Information Governance/FOI/Complaints Officer and an Information Governance Solicitor who feed into an Information Governance Steering Group (IGSG) which is the main oversight of records management responsibilities.

The IGSG will submit progress reports on the information governance and management framework and updates on the progression of the RMP to the Corporate Management Team and Policy & Resources Committee periodically. The Council also employs staff who have specific responsibilities for Information Management and Records Management.

Employees – Training and Guidance

The Council is also aware that all staff have a role in relation to record management responsibilities. The Council's Training and Development team provide a number of training resources in information governance including e-Learning. All staff now have to undertake mandatory information governance training which include Information Governance – an introduction, Information Security and Records Management.

As part of the Council's GDPR Implementation, and noted above, a full training programme was carried out which covered: Information Security, an Introduction to GDPR aimed at managers, how GDPR will impact on Elected Members, Data Breaches, Data Protection Impact Assessments.

An e-learning module on GDPR has been developed which is mandatory for all employees processing personal data. A robust Corporate Induction procedure has been introduced to ensure effective integration of new employees into and across the Council.

This requires to be completed before the new employee can access the system. Additional e-learning modules have been developed focusing on Data Breaches and Data Protection Impact Assessment which is available to all employees.

Element 13:   Assessment and Review

The Information Governance Steering Group (IGSG) will submit progress reports on information governance and updates on the progression of record management responsibilities to the Corporate Management Team and Policy & Resources Committee periodically.

As part of the Council's annual governance arrangements, Heads of Services undertake a self-assessment of compliance with Local Code of Governance (Appendix 2) which includes an assessment of compliance with areas of information governance such as records management, information security and mandatory training.

This is validated by the Chief Internal Auditor and any significant governance issues are included within the Annual Governance Statement which forms part of the Annual Accounts process. This is reviewed and validated by our external auditors.

To support the Council's GDPR Implementation, an Implementation Group was created that included subject matter experts from across Council services. Quarterly updates on GDPR Implementation were provided to the CMT and annual updates provided to the Policy and Resource Committee.

An audit of GDPR Implementation was carried out by Internal Audit to provide the Audit Committee with an assessment of the adequacy and effectiveness of the governance, risk management and controls surrounding the key risks faced by the Council in relation to the arrangements for managing the General Data Protection Regulation (GDPR). The overall control environment opinion for this audit review was satisfactory with one amber action identified to develop the control environment.

The amber issue identified was in relation to managing GDPR Training in particular this focused on identification of specific training needs of all key post-holders by assessing the impact of GDPR on service delivery. The review identified three issues, one of which was considered to be individually significant and an action plan was put in place to address all issues by 31 March 2018. The actions were implemented in line with the Audit recommendations - Audit Committee Report.

The sub groups highlighted previously highlighted in our Progress Update Review have been consolidated into one group, the Information Governance Steering Group (IGSG), to ensure efficiency. The Record Management Plan continues to be reviewed regularly by the IGSG. An IGSG Action Plan was reviewed by CMT in June 2022. An update report regarding Data Protection will be submitted to the Policy & Resources Committee in 2022.

Element 14: Shared Information

The Council routinely shares information on its public facing website Inverclyde Council website and through requests made under the Freedom of Information (Scotland) Act 2002. The Council also shares personal and confidential information with other organisations, relevant partner agencies and internally between its services under the terms of information sharing agreements.

An Inverclyde Information Sharing Protocol was approved at the Policy & Resources Committee on 21 May 2019. Its purpose is to ensure consistency in approaching information sharing and to reflect our legal duties to share information appropriately, proportionately, legally and responsibly within the organisation and out with the organisation. The Protocol ensures existing and proposed data sharing arrangements are consistent.

A copy of the Information Sharing Protocol was updated and provided as part of the GDPR Implementation work, Data Sharing Agreement Templates were developed and the Information Sharing Protocol was amended.

As part of the GDPR Post Implementation Plan a Data Sharing Agreement repository has been published on the Council's Intranet.

Element 15:   Working with Contractors

Retention and destruction arrangements for records created as a result of partnership working and where Services have been commissioned from external suppliers are detailed in the Records Management Policy under Partnership Working and Commissioned Services and Suppliers.

Where contractors create or manage public records, this will be considered as part of the procurement strategy and where required include an assessment of the tenderers' records management capability as part of the procurement process.

These contracts make specific provision for the survivorship and transfer of public records to the council or a successor contractor at the end of the contract period. Appropriate records management, confidentiality, freedom of information, data protection and business continuity clauses are included in every contract.

Bidders are also asked to confirm any recent cyber security incidents in our Data Protection certificates that require to be completed and returned with tender submissions.

Record management clauses are included in Inverclyde Councils General Conditions of Contract agreed with contractors (Appendix 2).

In the event that Inverclyde Council utilise a framework agreement by any of the national bodies such as Scotland Excel, Procurement Scotland, the Crown Commercial Service, SCAPE Scotland or ESPO then officers will review the terms and conditions from these frameworks on a case by case basis to ensure that Record Management clauses are included where necessary prior to any award.

Appendix 1

Element 1/3	Record Management Policy	PDF Records Management Policy.p

Appendix 2

Element 1/3 and 8	Version Control & Naming Conventions	Version Control & Naming Convention (PDF)
Element 1/3 and 9	SAR Guidance	SAR Guidance (Final) Version 1.3.pdf
Element 1/3	Clear Desk Policy	Clear Desk Policy v01.0.pdf
Element 1/3	Information Classification Policy	Information Classification Policy 1.
Element 1/3	Business Classification Scheme	Business Classification Scheme
Element 5, Element 6	Council's Policy for the Retention and Disposal of Documents and Records Paper and Electronic	Retention Policy (Final).doc
Element 8	Hybrid Working Guidance	10802-Covid-19-ICT-safety-and-security.
Element 8	Data Breach Management Protocol	Data Protection Breach Management
Element 9	Elected Member GDPR Guidance	GDPR Elected Members Presentation
Element 8	Elected Member Training	Refresher Training for Elected Members.
Element 12	Data Breach Training	Data+Breach+Training+Version+2.ppt

Element 1/3 and 8	Version Control & Naming Conventions	Version Control & Naming Convention (
Element 13	Local Code of Governance	Local Code of Governance 2021-22
Element 15	General Terms and Conditions of Contract	Terms-Conditions-March-2020.doc