Records Management Plan

The City of Edinburgh Council and Licensing Board

December 2015

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1.0	15/12/2015		Approved by Chief Executive and Corporate Leadership Team
1.1	17/06/2016	Henry Sullivan	Incorporate changes coming out of Keeper's Interim Report on 10-05-2016 – with minor changes to Elements 1, 3, 4, 6, 7, 9, 11 & 13
1.2	23/06/2016	Henry Sullivan	No changes – approved by Keeper of the Records of Scotland

Contents

Foreword

In accordance with the requirements of the Public Records (Scotland) Act 2011, I am pleased to present the City of Edinburgh Council's Records Management Plan to the Keeper of the Records of Scotland.

Records and the information they contain are a key asset for the City of Edinburgh Council. They are central to the Council's business processes, decision making and delivery of services, and provide evidence and accountability concerning our actions and performance. It is crucial, therefore, that we manage our records effectively to maximise their value for the Council and our stakeholders, and to ensure that our record keeping does not become a liability and a risk.

This plan is an essential part of the Council's developing information governance framework. Its implementation will help us to embed a culture of trust and responsibility in how we manage our records, support and transform the way we deliver services, and allow us to continuously assess and improve our records management arrangements.

As the senior officer responsible for this plan, I give it my full endorsement and look forward to reporting on future developments.

Andrew Kerr
Chief Executive

Overview

The Public Records (Scotland) Act, 2011 came into being as a result of the findings of the 2007 *Historical Abuse Systemic Review; Residential Schools and Children's Homes in Scotland 1950 to 1995*. The Review highlighted serious record keeping failings in regards to children's residential care throughout Scotland from 1945 to 1995. Its final report not only clearly set out the moral imperative for good record keeping in relation to children's residential care, but also more widely as a fundamental necessity for both protecting the rights of citizens and maintaining accountable and transparent decision making in the public sector.

The Act was accordingly drafted and approved on the premise that only by documenting, publishing and reviewing the records management practices of relevant organisations can public sector record keeping be improved.

The Act came fully into force in January 2013 and obliges both the City of Edinburgh Council and the City of Edinburgh Licensing Board to prepare and implement records management plans. This joint plan sets out how records are broadly created, managed and disposed of within both the Council and the Licensing Board. It is reviewed annually by the Council, in consultation with the Licensing Board, and is approved by the Keeper of the Records of Scotland.

Background

Records Management in the City of Edinburgh Council and Licensing Board

With the establishment of the City of Edinburgh Council in 1996 as a Unitary Authority under the Local Government (Scotland) Act, 1994, records management was a decentralised administrative function without routine specialist input, with the notable exception of social work.

The City Archives Service was established in 1986 by the former District Council of the City of Edinburgh. As part of its storage arrangements, the Service operated a storage and retrieval service for non-current records produced by Council services, though many services had their own storage arrangements. The service also conducted a number of departmental record surveys between 1998 and 1999 to encourage better record keeping.

In 2002, the Council commissioned a consultancy firm to review its records management practices as part of a study around the potential for an Enterprise Document Management System. The records management business case highlighted inconsistent practices and risks, and recommended the creation of a records management policy and the establishment of a central records store.

In response to this report and to support the Council's Fit for Future Programme and property rationalisation initiatives, the Council Management Team agreed a Records Management Policy in 2005 and established a central offsite Records Centre for the storage of non-current paper records.

In 2006 the Council established the new position of a Records and Archives Manager to oversee the recovery of the City Archives Service and the development of a Council-wide records management programme.

In 2011 the Council reviewed its Records Management Policy and approved its first set of Council-wide retention schedules.
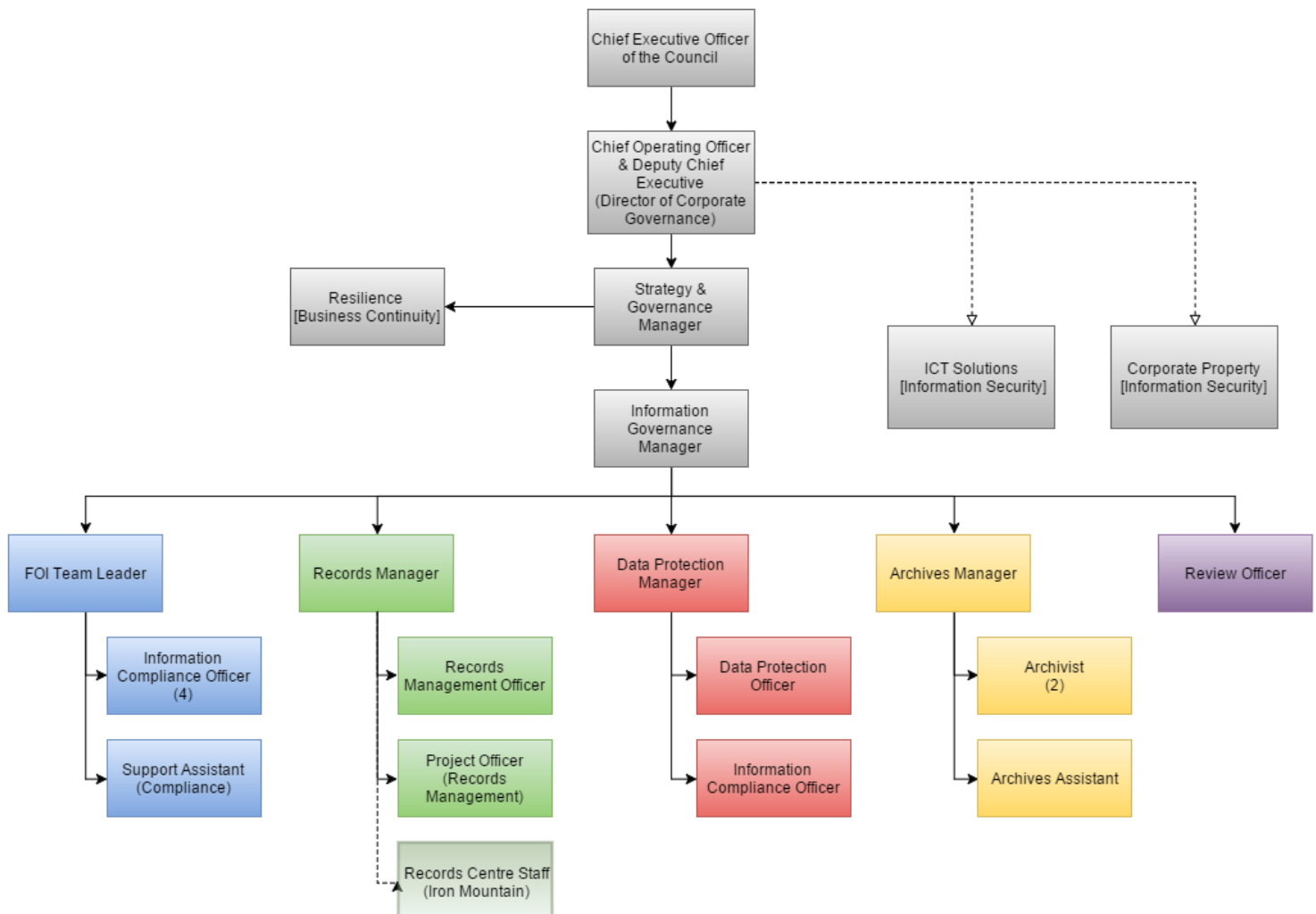
In 2013, the Council centralised its Freedom of Information personnel, expanded its Records Management team and created a new Data Protection team, all under the umbrella of an Information Governance Unit managed by an Information Governance Manager.

Since 1976 the Council, and its predecessor bodies, have provided administrative support to the City of Edinburgh Licensing Board, managing its records on its behalf. This has continued under the Licensing (Scotland) Act, 2005.

The Council's Information Governance Framework

In December 2013 the Council adopted an Information Governance Strategy that commits the organisation to develop and maintain a framework of relevant policies, procedures and guidance, as well as undertake projects to address specific issues and opportunities around Council information.

By the end of 2014 the Council had approved a suite of new policies for Data Protection, Data Quality, Freedom of Information, Information Governance and Records Management and established a senior management body called the Information Council to support and review an information governance annual plan of work.

Coming up to its third information governance annual plan in January 2016, the Council is now moving towards focusing on training and assessment in order to underpin and promote good records management practice and policy compliance and develop a more robust information risk management regime.

Records Management Systems

The Council and Licensing Board broadly have three types of record systems that fit the definition within ISO 15489-1 2001; *Information and documentation - Records management*. These are:

- Manual paper record systems

- Manual unstructured electronic record systems (e.g. network drives and Outlook)

- Manual structured electronic record systems (e.g. databases and line of business IT systems)

There is currently no automated record system in the form of an Electronic Document and Records Management System (EDRMS), but a wider Enterprise Content Management Solution (ECMS) will start to t be implemented with our new IT provider, CGI IT UK Ltd. from the start of April 2016.

Note on Element Layout

The Council's plan is based on the Keeper's own published Model Records Management Plan template. Each element is presented as a separate section but following a standard structure of:

- **Overview:** providing context and a synopsis of where the Council is currently, or will be shortly, for each element, in reference to the Keeper's detailed guidance provided via the Model Records Management Plan.

- **Evidence:** provided in support of the statements outlined in each overview, including; policies, procedures, guidance, certificates, job descriptions, terms of references, specifications and other documents. Some evidence is referenced multiple times due to being relevant across a number of elements. Some evidence is submitted only as screenshots or statements, as access to internal resources cannot be arranged otherwise.

- **Areas for Improvement:** provided in recognition of the intent of the Public Records (Scotland) Act, 2011, as a driver for continuous improvement in public sector records management. These are submitted as broad outlines of where the Council sees itself

improving over the next five years. It is by no means an exhaustive list and each element's areas of improvement will change over time. These have been, or will be, incorporated into the Council's information governance annual plan. They have been divided into thematic areas according to the below scopes. Some actions are repeated in different elements due to their scope.

AREA	SCOPE
Compliance	• Actions that relate directly to statutory compliance or external standard accreditation
Culture	• Actions that relate to the implementation of Council policy requirements or the assessment and improvement of staff behaviour and practice
Governance and Policy	• Actions that relate to policy development, information governance roles and internal monitoring
Technical	• Actions that relate to the assessment, configuration and development of IT systems to meet records management best practice and statutory requirements
Training and Awareness	• Actions that relate to staff training and the development and promotion of guidance and support

Element 1 – Senior Management Responsibility

In the face of organisational, legislative and technological change, our records management plan is a recognition of the need to continuously develop and improve our record keeping practices, ensuring that the needs of the organisation and our stakeholders can be properly met

Alastair Maclean, Chief Operating Officer

Overview

The Senior Manager responsible for the Councils Records Management Plan is **Andrew Kerr**, the Council's Chief Executive. For the Licensing Board it is **Carol Campbell**, Head of Legal and Risk, as the Clerk to the Board.

Under the Council's Scheme of Delegation, the Head of Strategy has delegated responsibility for compliance with our records management statutory requirements. The Head of Strategy is also the senior manager responsible for information security and business continuity. More broadly under general delegation, each director is responsible for the records of their service area.

The Head of Strategy is also designated as the Council's Senior Information Risk Owner (SIRO). The SIRO is supported by the Information Governance Manager as Deputy SIRO, an Information Council and a network of Information Asset Owners.

The Information Council has been established to oversee and drive forward an information governance annual plan of development and improvement work undertaken primarily by the Information Governance Unit but also with cross Council working groups. The Council's Records Management Plan will be monitored and reviewed under its remit.

Information risks are reported to the Information Council for management actions and monitoring. These can be escalated to the SIRO on a case by case basis.

In July 2015 the Council established a network of senior manager Information Asset Owners who are responsible for the information assets that fall within their Service or delegated area of Council wide responsibility (e.g. Finance, HR, Health and Safety etc.). These individual officers are responsible for the management and use of their information assets, primarily through a risk management model.

The Council is currently undergoing a significant amount of organisational change and it is likely that the Senior Manager under this Element will change. This will be reported to the Keeper.

Evidence

- [Foreword from the Chief Executive](#)
- [Records Management Policy](#) – Sections 6.2 and 6.4
- [Information Governance Policy](#) – Sections 6.3, 6.6, 6.7
- [Scheme of Delegation (February 2016)](#) – Section 4.2 (g)

- [Information Council Terms of Reference](#)
- [Information Asset Owners; roles and responsibilities](#)
- [Information Asset Management Briefing Paper](#)
- [Note from Licensing Board on the joint Records Management Plan](#)

Areas for Improvement

AREA	ACTIONS	RESPONSIBILITIES
Governance and Policy	• Review of Information Council membership to reflect organisational and structural changes • Develop and implement reporting processes for information asset owners to highlight risks and opportunities around their information assets	• Information Council • Information Governance Unit
Training and Awareness	• Develop and provide formal SIRO and Deputy SIRO training and routine refresher courses to define and support the roles and their responsibilities • Finalise and provide formal training for Information Asset Owners to raise awareness about information risk and the importance of good records management as a set of controls to manage that risk for their information assets	• Information Governance Unit; Organisational Development

Element 2 – Records Manager Responsibility

The records management plan is a critical part of our information governance framework, empowering our staff to value and use information responsibly. The Information Governance Unit, with senior management support, has been the key driver in developing and implementing this framework

Kirsty-Louise Campbell, Strategy and Governance Manager

Overview

Since 1996 the Council has had specific officers responsible for the management of adult social work records, including criminal justice, and children's social work records. These posts developed and implemented a number of records management procedures and guidance documents within the relevant directorates at the time.

A council wide post was only created in 2006 with the creation of a Council Records Manager who was responsible for both archives and records management. By the end of 2013 this post became the Records and Information Compliance Manager and was responsible for corporate compliance with archives (Element 7), data protection (Elements 9 and 14), freedom of information and records management legislation and best practice. A new Records Manager post reporting to this manager was also created. In April 2014 the Records and Information Compliance Unit became the Information Governance Unit and its manager is now the Information Governance Manager.

The Records Manager post holds the operational responsibility for the joint Council and Licensing Board Records Management Plan. The current post holder is **Henry Sullivan**. In reference to the Records Management Plan, he is directly responsible for:

- Developing, maintaining and implementing records management policies, guidance and procedures required by the Council (Element 3)

- Managing an audit programme to review, support and improve records management practices within the Council (Element 13)

- Providing regular reports to senior management in regards to statutory records management compliance and related codes of practice (Element 1)

- Maintaining the Council's Retention Schedules (Element 5)

The Records Manager has a team of two staff but is also supported by a nominated officer in each Council directorate. These Directorate Records Officers are delegated by their directors with responsibility and authority over their directorate's records. They act as points of authorisation, coordination and reporting on records management issues.

The Council is also developing a network of Data Stewards with responsibility around the day to day management of information assets. While their primary focus will be on data quality and business improvement, they will also be important in promoting good records management practices around record creation, retention and disposal.

Evidence

- Information Governance Unit structure
- Job Descriptions
    - Records Manager
    - Records Management Officer
    - Project Officer (Records Management)
    - Information Governance Manager (*N.B. this post was formerly the Records and Information Compliance Unit Manager*)
- Records Management Policy – Sections 4.8.2 and 6.10.7
- Directorate Records Officers; guidance on role
- Data Stewards; roles and responsibilities

Areas for Improvement

AREA	ACTIONS	RESPONSIBILITIES
Culture	• Expansion and development of the data steward network within the Council	• Information Governance Unit; Information Asset Owners; individual service areas
Governance and Policy	• Review role and responsibilities of DROs in light of organisation and structural change	• Information Governance Unit
Training and Awareness	• Development and roll out of training for Directorate Records Officers	• Information Governance Unit

Element 3 – Records Management Policy

My role is to help staff in my service area to adopt and adapt the advice and requirements within the records management policy and related guidance, and to make decisions when required on how our records are managed. The policy is clear about what good records management is about, but it is up to us all to make it actually happen

Alison Coburn, Principal Officer to the Director of Economic Development
and Directorate Records Officer for Economic Development

Overview

The Council has had a corporate records management policy since 2005 and is now on its third substantial revision, approved by the Corporate Policy and Strategy Committee on 30 September 2014.

The current policy sets out the following:

- **Defined terms** – including 'Council records', 'File Plan', 'Records Management', 'Record keeping systems' , 'Retention rules' and 'Vital records'
- **Responsibilities** – setting out responsibilities around Council records for all Council staff from the Chief Executive to Directors, to Managers and frontline team members, but also covering specific responsibilities for contractors, Directorate Records Officers and the Information Governance Unit
- **Baseline compliance** – statements of expected practice around record creation, storage, management and disposal
- **Records Management Plan commitment** – in terms of development, authorisation and ongoing review
- **Implementation** – a broad outline of how the policy will be implemented with some initial key success measurements;
    - Records management manuals
    - Disposal registers
    - Retention schedules
    - Corporate file plan
    - Routine records management training for council staff
- **Audit and Review** – a commitment for ongoing reviews of policy compliance and where such reviews will be reported to
    - Includes a commitment to an ongoing IT system audit in terms of record keeping functionality

The policy sits within a suite of interrelated information governance policies that each support different aspects of records management within the Council and this RMP. These are:

- an **Information Governance Policy** – covering information asset management (Element 4), information risk (Elements 8, 9 and 10), and annual assessments (Element 13)

- a **Data Quality Policy** – covering data creation and management (Element 3)

- a **Data Protection Policy** – covering the Council's responsibilities under the Data Protection Act, 1998 (Elements 9 and 14)

- a **Freedom of Information Policy** – covering how Council information is released under the Freedom of Information (Scotland), 2002, Environmental Information (Scotland) Regulations, 2004 and INSPIRE (Scotland) Regulations, 2009 (Element 14)

The Council also has an Information Security Policy, which is currently undergoing revision.

Compliance with the Records Management Policy will be through the creation and maintenance of local records management manuals that document local practices around record creation, storage, management and disposal.

The policy is promoted via inclusion within the Council's annual mandatory policy review by all staff and is also referenced in the Council's foundation information governance e-learning module.

Additional records management guidance for staff is available on the Council's intranet. The core is a toolkit for staff that covers broad topics such as email management, file naming, office moves and scanning. However, more specific guidance is also developed and published by the Records Management team as and when required.

The Records Management team also offers shared drive projects that review and improve the storage and management of unstructured electronic records on the Council's network drives on an individual team or service basis. These build in compliance with Council guidance and procedures around classification, retention, destruction, information security and vital records.

The Council is also preparing for an Enterprise Content Management Solution, which will have functionality to apply relevant policy requirements. While it is not implemented yet, the system specification has been finalised and accepted by the IT provider.

Contractors are covered by the policy, with specific contractual clauses within the Council's standard terms and conditions for goods and services. These set out the relationship and requirements for contracts that fall under sections 3(1b) and 3(2) of the Public Records (Scotland) Act, 2011.

Records management clauses establishing the relationship between the Council and contractors undertaking one or more of its statutory responsibilities have been approved and will be in use on a pilot basis from early 2016. A concomitant risk based monitoring regime has also been established between the Council's Records Management team and Commercial and Procurement Services.

Evidence

- Information governance policies
  - [Records Management Policy](#)
  - [Data Protection Policy](#)
  - [Data Quality Policy](#)
  - [Freedom of Information Policy](#)
  - [Information Governance Policy](#)
  - See [Council Policy Register](#) for authorisation details
  - [Information Governance Strategy & Policies – intranet page screenshot](#)
- Records Management Manuals
  - [Intranet guidance](#)
  - [Workbook for Records Management Manuals](#)
  - [Information Governance Unit Records Management Manual](#)
- Records Management Guidance
  - [Screenshot of Orb content](#)
- Shared Drive Projects
  - [Project template diagram](#)
  - [Shared Drive Project Guidance; Roles and Tasks](#)
  - [Economic Development Shared Drive Project; PID](#)
  - [Economic Development Shared Drive Project; local file plan](#)
- [Output Based Specification 107; Enterprise Content Management](#)
- Contracts
  - [Standard Terms and Conditions for Goods and Services; extract for records management clauses](#)
  - [Guidance and Risk Assessment to suppliers and managers](#)

Areas for Improvement

AREA	ACTIONS	RESPONSIBILITIES
Compliance	• Roll out risk based approach to records management assessment of contractors • Review existing contracts to identify PRSA responsibilities and investigate what advice and mitigation can be taken within existing contractual arrangements	• Information Governance Unit; Commercial and Procurement Services
Culture	• Establish a multi-year programme for the development and auditing of local records management manuals throughout the	• Information Governance Unit • Information

	Council • Roll out of information governance maturity model assessment to measure policy compliance • Develop and implement reporting processes for information asset owners to highlight policy compliance risks and issues around their information assets	Governance Unit / Business Intelligence
Governance and Policy	• Review of Records Management Policy in light of organisational and structural changes and ICO Audit recommendations	• Information Governance Unit
Technical	• Implementation of an ECM solution to apply policy requirements to unstructured electronic records	• IT provider; ICT Solutions; Information Governance Unit
Training and Awareness	• Development and roll out of additional records management workshop and presentation based training to promote and localise policy requirements • Inclusion of information risk management in the planned e-learning information governance module for managers to support policy non compliance reporting and resolution • Promotion of records management manuals through a communications plan that ties into the development and audit programme	• Information Governance Unit; Organisational Development • Information Governance Unit; Communications

Element 4 – Business Classification Scheme

I just had a look at the new filing system. It is pretty straight forward and what I like about it is that every housing scheme now has all information required for them. Overall the whole thing is easy to use and navigate.

The new filing system and I will get on just fine ☺

Shared drive project feedback; Wiola Callcutt, Housing Support Officer

Overview

The Council has established and approved a Business Classification Scheme and committed in policy to developing a corporate file plan off it. The Council's scheme is based on the Local Government Classification Scheme, as amended by the Scottish Council Archives for its Record Retention Schedules.

The two level classification scheme ('Category' and 'Function') is controlled by the Information Council, which will consider and approve alterations on a case by case basis. The scheme is currently implemented as follows:

- As the structure for the Council's retention schedule, effectively creating a third 'Activity' level for the classification scheme
- As one of the mandatory data fields for the Council's information asset register– with every information asset being classified within the scheme
- As the baseline for local folder structures created through shared drive projects with Council service areas
- As a standalone searchable directory on the Council's intranet

It will also be implemented as controlled metadata for content within the Council's ECM solution.

Evidence

- [Business Classification Scheme Report to Corporate Leadership Group](#)
- [Email confirmation of Business Classification Scheme approval by Corporate Leadership Group](#)
- [Records Management Policy](#) – Sections 5.2.2 and 6.10.4
- [Council Retention Schedule](#)
- [Business Classification Scheme – intranet directory screenshots](#)
- [Business Classification Scheme – intranet guidance](#)
- Information Asset Register
  - [Phase 1 structure](#)
  - [Breakdown of phase 1 information asset data by business classification](#)

- o [Screenshot of register showing link to Business Classification Scheme](#)
- [Output Based Specification 107; Enterprise Content Management](#)

Areas for Improvement

AREA	ACTIONS	RESPONSIBILITIES
Compliance	• Review and classify contracts according to BCS and retention schedules in order to demonstrate where public records are being creating and / or managed by contractors	• Information Governance Unit; Commercial and Procurement Services
Culture	• Link IT systems to the Information Asset Register in order to classify and manage their content according to the BCS • Wider roll out of shared drive projects to restructure network drive content	• Information Governance Unit; ICT Solutions • Information Governance Unit; individual service areas
Technical	• Implementation of BCS in the ECM solution configuration • Development and implementation of a classification step for all transfers of records from network drives to ECM	• IT provider; ICT Solutions; Information Governance Unit
Training and Awareness	• Develop an awareness campaign around the Business Classification Scheme centred around the retention schedule, information asset register and upcoming ECM solution	• Information Governance Unit; Communications

Element 5 – Retention Schedules

The support given to me in relation to the retention of records has been extremely helpful.

It has assisted my understanding of roles and responsibilities in relation to the duration required for holding records. It has also aided my understanding of the bigger role and responsibility in this area, attributed to the organisation as a whole.

2015 Record Retention Review feedback; Caroline Bayne, Principal Officer
Workforce Learning and Development

Overview

The Council approved its first set of corporate retention schedules in 2011, using the Scottish Council on Archives Record Retention Schedules as the baseline. Prior to this some Council service areas, notably education and social work, operated local retention rules since the 1980's.

These function based 2011 retention schedules have now been substantially revised through an eighteen month consultation across the organisation, concluding in November 2015 with a combined authorisation by the Council Leadership Team. The new rules not only have the core trigger, retention period and disposal information but also version control, authorisation and usage details.

While the functional structure still remains and is central to the management of the nine hundred and sixteen individual rules, they are published by organisational structure for ease of use – initially by directorate but also by lower organisational divisions on demand.

The retention rules have been available, alongside with relevant guidance, on the Council's intranet since 2012, with the revised rules due to be published and promoted in January 2016.

A new procedure has also been established for the authorisation and maintenance of individual retention rules. It formalises a process that involves the Council Records Manager and the Directorate Records Officers. Retention rules with a permanent retention disposal action are also reviewed and approved by the Council Archives Manager.

Evidence

- Council Retention Schedule – extract for RMP
- Records Management Policy – Sections 4.5.4, 6.10.5
- Retention Rule Management Procedure

Areas for Improvement

AREA	ACTIONS	RESPONSIBILITIES
Culture	• Review of boxes and files held in the Council's Records Centre against the revised retention rules • Work with the Council's ICT Solutions and Commercial and Procurement Services to build in retention functionality as part of IT system procurement standard requirements • Retention rules for unstructured electronic records need to be more clearly identified through records management manuals and shared drive projects	• Information Governance Unit • Information Governance Unit; Commercial and Procurement Services; ICT Solutions • Information Governance Unit; individual service areas
Governance and Policy	• Develop and follow a formal review cycle for the Council's retention rules	• Information Governance Unit
Technical	• Better promotion and accessibility of the retention rules through retention policy management software is currently being investigated • Line of business IT systems need to be linked to relevant retention rules via phase 2 of the information asset register • Configuration of ECM solution to include all relevant Council retention rules	• Information Governance Unit • Information Governance Unit; ICT Solutions • IT provider; ICT Solutions; Information Governance Unit
Training and Awareness	• Develop an awareness campaign that includes the revised retention schedule	• Information Governance Unit; Communications

Element 6 – Destruction Arrangements

Council records disposal guidance provides clear and concise information regarding the disposal of Council records and how to document these disposals.

Part of June 2015 ICO Audit response; Jenny Hodge, Project Officer
(Health and Social Care)

Overview

The Council's Records Management Policy states that no Council record may be destroyed without appropriate authorisation and due regard to legal obligations; that disposal must be recorded; and that disposal must be carried out securely and in line with the Council's records retention schedules.

In terms of physical record destruction, the core office estate have lockable security bins in multiple locations on each floor, with clear guidance for staff on what should be placed in the recycling, standard and confidential waste bins. These are emptied routinely, and on demand, by facilities staff. In the Council's neighbourhood offices and other office accommodation, confidential waste sacks are provided by the Council's Trade Waste Services section (TWS). Subsequent collection of confidential waste across the whole Council estate is managed in house by TWS and actual destruction is undertaken by a contractor, the Scottish Braille Press.

Disposal of physical records stored at the Council's Records Centre is managed jointly by the Records Management team and Iron Mountain Ltd., who run the centre on behalf of the Council. Disposal reports are run routinely by the Records Management team using Iron Mountain's inventory software to highlight boxes and files that are due for disposal. These are identified by checking their destruction dates, which were provided at accession or updated subsequently. The Records Management team then contacts the relevant manager to confirm that disposal can take place and, when disposal is confirmed, they liaise with Iron Mountain, who takes over the responsibility for the disposal of the records. Each stage is documented by whoever takes responsibility for that stage of the process, culminating in the issue of a destruction certificate by Iron Mountain to the Records Management team, confirming final disposal of the records.

Both retention and disposal guidance within the Council clearly state that electronic records should be disposed of at the same time as physical copies, and vice versa. While there are areas of good practice, notably within Children and Families and Health and Social Care, the documented and routine destruction of electronic records is an area for improvement through records management manuals and the Enterprise Content Management solution.

The large majority of ICT hardware used by the Council is owned by our existing IT provider, BT Group. Obsolete, or surplus to requirements, hardware is returned to them, as per our contractual arrangements. Non-BT ICT hardware is destroyed securely via suppliers on a case by case basis, managed and monitored by our ICT service desk section.

Evidence

- Records Management Policy – Section 4.5
- Disposal guidance
    - Guidance document
    - Intranet guidance - screenshot
    - Disposal form template
- Health and Social Care Record Destruction Guide
- Records Centre arrangements
    - Disposal process
    - Sample destruction certificates
- Local destruction arrangements
    - Trade Waste Services confidential waste procedure
    - Sample destruction certificate
- IT hardware destruction
    - Sample core estate hardware disposal certificate
    - Sample non-core estate hardware disposal certificate
    - Contract clauses for media and backup disposals
    - Details of back up cycle and disposal

Areas for Improvement

AREA	ACTIONS	RESPONSIBILITIES
Compliance	• Review Trade Waste Services confidential waste collection and disposal service against EN 15713:2009 *Secure destruction of confidential material*	• Information Governance Unit; Trade Waste Services
Culture	• Development of local disposal registers throughout the Council • Capture and monitor any risks around local disposal practices through physical security audits • Work with the Council's ICT Solutions and Commercial and Procurement Services to build in disposal functionality as part of IT system procurement standard requirements	• Information Governance Unit; individual service areas • Information Governance Unit; Commercial and Procurement Services; ICT Solutions
Technical	• Implementation of disposal workflow within ECM solution for routine and documented destruction of electronic records	• IT provider; ICT Solutions; Information Governance Unit

Element 7 – Archiving and Transfer Arrangements

The City Archives and the records within its care are quite simply the finest resource of Edinburgh's civic memory and are an invaluable asset to this authority, all of our citizens and the wider world.

Approved statement by Councillors Gordon Munro, William Henderson, Allan Jackson and Melanie Main

Overview

The Council operates an in-house archive service for the preservation of historical records and records with enduring evidential and informational value. The Council's Archives Service -Edinburgh City Archives service (ECA)- was established in 1986 to acquire, preserve, promote and make accessible the archival heritage of the City of Edinburgh. These records relate both to the Council and its numerous predecessor authorities, as well as local businesses and organisations. ECA is part of the Council's Information Governance Unit.

In 2011 the Council funded the renovation of an existing storage space to accommodate an environmentally controlled repository to store ECA's collections. This storage space is monitored and managed according to PD 5454:2012 Guide for the storage and exhibition of archival materials specifications.

The Council's record retention schedules indicate which records should be retained permanently. Records that are otherwise due for disposal can be flagged by managers for archival preservation through the Council's Archive Transfer procedure, which is promoted by the Council's Records Management team.

All new record accessions are recorded in ECA's accession register and on Axiell's CALM solution. Accession are arranged and described as part of the ECA cataloguing programme and listed to ISAD(G) and other professional archival standards.

The Information Governance Unit is in the process of acquiring space for a digital archive repository for electronic records. It is also investigating potential software solutions in conjunction with other Scottish Local Authorities.

ECA are currently working towards Archives Accreditation. Part of this work involves reviewing current policies and revising where necessary.

Evidence

- Archive Policies & Procedure
    - Collections Development Policy (Draft)
    - Collections Information Policy (Draft)
    - Records Management Policy- section 4.6 and 6.11
    - Archive Transfer procedure (for depositors)
- Council Retention Schedule – extract for RMP

- Accessions
    - [Accessioning Procedure](#) (for Archives staff)
    - [Accession Register Extract](#)
    - [Screenshot of CALM Accession](#)
    - [Archive Deposit Form](#)
    - [Archive Deposit Checklist](#)
    - [Archive Deposit Agreement](#)
- Job Descriptions
    - [Archives Services Manager](#)
    - [Archivist](#)

The draft policies have been approved by the Information Council and will go to Culture and Sport Committee as part of a suit of policies early in 2016.

Areas for Improvement

AREA	ACTIONS	RESPONSIBILITIES
Compliance	• Gain Archive Accreditation	• Information Governance Unit
Culture	• Strengthen direct deposit relationships between Council services and ECA beyond established core depositors • Work with the Council's ICT Solutions and Commercial and Procurement Services to build in export / migration functionality as part of IT system procurement standard requirements	• Information Governance Unit • Information Governance Unit; Commercial and Procurement Services; ICT Solutions
Technical	• Development of a digital repository in terms of space, procedures and software • Investigating potential for a collective Scottish local government strategy and / or solution for digital preservation	• Information Governance Unit; ICT Solutions
Training and Awareness	• Inclusion of archive transfer arrangements as part of Council wide records management training	• Information Governance Unit; Organisational Development

Element 8 – Information Security

The Council recognises the value and importance of its information resources, and its statutory obligations to protect them against corruption or loss. We will actively protect these assets by:

- *Operate security governance to ensure senior management direction and promote compliance throughout the organisation.*

- *Ensure that controls are based on business requirements and are balanced against risk assessments that are reviewed on a regular basis.*

- *Maintain an effective, properly resourced information assurance group to monitor controls and assist user departments to safeguard their data*

Claudette Jones, Chief Information Officer

Overview

The Council has an Information Security Policy, agreed in 2004, which is currently being revised as part of the transition to the new IT provider in April 2016. However existing and managed information security arrangements consist of the following:

- ICT Acceptable Use Policy for Staff
- ICT Acceptable Use Policy for Elected Members
- Information security breach process
- Use of the Public Services Network for secure data sharing with other agencies
- Hardware encryption for all corporate laptops
- Mobile device management for all Council smart phones and tablets
- Endpoint security for removable media on the corporate IT estate

Information security guidance is also available on the Council's intranet and security advisories are issued to staff through intranet content or directly via email campaigns, as and when required.

Relevant training is provided through a specific ICT Acceptable Use e-learning module and as part of a separate information governance e-learning module. Both of these are mandatory for all staff to complete, initially at induction, and then as part of an annual refresher.

The Council has an Information Security Officer (ISO) and has just recruited to the vacancy of the Information Security Manager (ISM). The ISM (or ISO in their absence) attends the Data Council (an information governance working group) to provide advice on, and raise issues around, information security and routinely deputes for ICT on the Information Council.

In terms of physical record security the Council has had clear desk arrangements since 2006 and within Waverley Court, the Council's main administrative headquarters, each office based staff member has a secure locker and team allocated secure storage.

The Council's Records Centre has secure access and sign in arrangements, which is managed by the in situ Iron Mountain staff according to agreed procedures and service levels. As a secure and monitored storage environment, it is used by all Council directorates.

Guidance and support on office moves is provided by the Records Management team, while specific guidance on social work case file handling is also available and used by relevant staff.

Evidence

- Information security policies
    - [Information Security Policy](#)
    - [ICT Acceptable Use Policy for Staff](#)
    - [ICT Acceptable Use Policy for Elected Members](#)
    - [Security clauses extract from IT contract](#)
- Information security guidance
    - [Data Encryption User Guide](#)
    - [Externally Hosted Systems guidance](#)
    - [Incident briefing note / advisories – samples](#)
    - [Office Moves Guidance](#)
    - [Records Management and Security OF Service User files procedure for Health and Social Care](#)
    - [Guidance Note for Staff in Children and Families on the Safe Handling of Paper Records](#)
    - [Using Mobile Technologies – factsheet](#)
- Job descriptions
    - [Information Security Manager](#)
- [Records Centre – access control statement](#)
- [PSN accreditation note](#)

Areas for Improvement

AREA	ACTIONS	RESPONSIBILITIES
Culture	• Development of a physical security office audit programme to reinforce Council clear desk arrangements and better identify security risks	• Information Governance Unit; Facilities Management
	• Review and roll out of existing guidance	• Information

	on secure handling of records	Governance
Governance and Policy	• Review and update of Information Security Policy	• Information Governance Unit; ICT Solutions
Training and Awareness	• Develop and roll out awareness campaign to reinforce records security – to tie in with audit programme and guidance	• Information Governance Unit; Communications; ICT Solutions

Element 9 – Data Protection

Within adult protection work, we hold sensitive personal information about individuals who are at risk of harm as well as those who perpetrate harm. Our Data Protection policy and guidance enables us to ensure that this information is safely managed.

Kate Fennell, Lead Officer Adult Protection

Overview

The Council is committed to meeting its obligations around the management of people's personal data as set out by the Data Protection Act 1998. It recognises that there is a need to balance the rights of individuals with the functions and operational requirements of the Council. There is a Data Protection Policy, which was approved by the Corporate Policy and Strategy Committee in September 2014, which sets out and formalises the Council's approach to ensuring that personal information is properly processed, managed and protected in accordance with the requirements of the Data Protection Act 1998.

The Council is registered as a Data Controller with the UK Information Commissioner (Registration No: Z5545409)**.** The Council also manages registration on behalf of Elected Members. The process of registration is administered by the Data Protection team who also provide specialist support and advice to services regarding their data protection responsibilities.

The Data Protection team also processes all subject access requests (SARs) received by the Council, and requests made under section 29 (for information required for the prevention and detection of crime). This approach ensures that a consistent approach is applied to requests for personal information and that requests are also answered within statutory timescales. Compliance with statutory timescales is reported to the Information Council and the Corporate Leadership Team.

General guidance regarding Data Protection is available to all staff on the Council's intranet, this includes advice surrounding protecting personal information, fair processing or privacy notices, conducting Privacy Impact Assessments (which is mandatory for new or revised processes or projects that involve personal data), and the procedure for reporting and managing a data protection breach. Data protection responsibilities are also included within the Information Governance e-learning package which is mandatory piece of training for all staff.

The Council's standard terms and conditions for goods and services contracts include a section on Data Protection that outlines a basic data controller to processor relationship. Where the contractual relationship is more complicated, the Data Protection team provide bespoke advice to the relevant Council service area.

The Council has made significant improvement in its approach to information governance over the past two years. Although still in the midst of implementing improving practice, the Council's arrangements for managing data protection was audited by the UK's Information Commissioner's Office in June 2015. This was a consensual audit, in recognition of the

Council's commitment to improve its data protection practices. The ICO audit was limited to the areas of records management, subject access, and data sharing. The auditors noted that there were several areas of good practice and acknowledged the Council's plans for further development and improvement. The Council received 'Limited Assurance' rating (based on current practices), and is working towards implementing the ICO recommendations in line with agreed timescales.

Evidence

- Data Protection Policy
- ICO Registration
- IGU Records Management Manual
    - SAR procedure
    - Section 29 procedure
    - Breach procedure
- Data Protection guidance
    - ORB screenshot
    - Privacy Impact Assessments – guidance
    - Fair Processing – guidance
- 2015 June-September ICO Audit Executive Summary
- Job Descriptions
    - Data Protection Manager
    - Data Protection Officer
    - Information Compliance Officer (Data Protection)
- Contracts
    - Standard Terms and Conditions for Goods and Services; extract for data protection clauses

Areas for Improvement

AREA	ACTIONS	RESPONSIBILITIES
Compliance	• Review and improve SAR process in line with ICO audit recommendations • Review the Council's Data Protection arrangements in light of the new EU regulations when they are finalised	• Information Governance Unit
Culture	• Review and revise the Council's data collection and fair processing arrangements in line with ICO audit recommendations	• Information Governance Unit

	• Review and revise all Data Protection guidance for staff and the public	
Governance and Policy	• Revise Data Protection Policy	• Information Governance Unit
Training and Awareness	• Inclusion of Data Protection content (e.g. data collection, information sharing and privacy impact assessments) within the planned e-learning information governance module for managers	• Information Governance Unit; Organisational Development

Element 10 – Business Continuity and Vital Records

We have always asked essential activity areas within the Council to identify their vital records as part of our business continuity management but, by working more closely with Records Management, we now have greater clarification on what vital records are and, based on their advice, we are now collecting improved information about these records

Nikola Brown, Council Business Continuity Officer

Overview

Under the Civil Contingencies Act 2004, the Council has a legal duty to ensure that, in the event of an emergency or disruption, the impact on our day-to-day activities is kept to a minimum and our vital community services are maintained.

In addition to fulfilling our obligations under the Civil Contingencies Act 2004, the Council holds corporate registration to the International Standard ISO 22301: 2012 *Societal security – Business continuity management system*. The Council is required to re-register to this Standard every 3 years and Continual Assessment Visits (CAVs) are conducted every 6 months by the British Standards Institute (BSI) to ensure we continue to comply.

The Council has a Resilience Management System (RMS) and Procedures Manual which documents how Business Continuity Management (BCM) is undertaken within the organisation.

The Council has a Corporate Business Continuity Plan and Service Area Business Continuity Plans in place. These plans include details on incident management and reporting, corporate business continuity strategy, cross-council functions (which includes records management) as well as the data collected through business impact analyses (BIAs). These plans, and the methodology behind them, are all agreed and signed-off by the Council Leadership Team.

Essential activities are identified and prioritised using an agreed methodology. The Council has approximately 145 essential activities. BIAs are conducted for each essential activity to assess the impact if the activity cannot be delivered and to identify and capture the resources required to deliver the activity. These resources include details of any vital records (type of record, whether it is backed-up, where the back-up is stored and frequency of back-up) that an essential activity depends on. In addition the BIA identifies information on IT systems, hardware and telephony which is deemed critical for the delivery of the essential activity. Information collected through the BIAs is signed-off by the relevant Head of Service.

Guidance for managers on how to identify vital records is incorporated into the Resilience Management System. Guidance on how to secure and manage vital records is provided on the Council's intranet via the Records Management team. Information assets are also marked within the information asset register on whether or not they directly relate to an essential activity.

Edinburgh City Archives has disaster management plans for both its archive storage areas as well as a priority user subscription (No.075) with Harwell Document Restoration Services. The Council's Records Centre is covered under the wider business continuity plans of Iron Mountain Ltd.

Evidence

- Council Resilience Policy
- BSI certificate of registration for compliance with ISO 22301: 2012
- Screenshot of vital records section of the Resilience Management Information System
- Helpful Information on BIA Completion – see note 12; Vital Records (pg.4)
- Vital records guidance
- Disaster Planning
  - Edinburgh City Archives – City Chambers Disaster Plan
  - Edinburgh City Archives – Murrayburn Disaster Plan
  - Statement from Iron Mountain Ltd. on Records Centre business continuity planning
- IT back up contractual arrangements extract

Areas for Improvement

AREA	ACTIONS	RESPONSIBILITIES
Culture	• Phase 2 of the Information Asset Register to include a stronger link to specific essential activities for information assets	• Information Governance Unit; Corporate Resilience Team
Technical	• Complete move to an electronic Resilience Management Information System in order to better integrate advice (e.g. on vital records) with the BIA data capture process.	• Corporate Resilience Team
Training and Awareness	• Inclusion of vital records within wider information governance training programme	• Information Governance Unit; Organisational Development

Element 11 – Audit Trail

Social work involves life changing decisions, so it is essential that record keeping and maintenance are of the highest standards. Routine and systematic file tracking has been an essential tool to enable us to achieve this.

Alistair Gaw, Head of Support to Children and Young People

Overview

An audit trail, from collection to disposal, can be evidenced for all hard copy records managed within the Council's offsite Record Centre.

The local management of both physical and electronic records is undertaken by individual Council service areas according to their individual business requirements. Staff are supported in good practice through on demand advice and training and an e-learning module on information governance.

The Information Governance Unit is in the process of promoting records management manuals as the means to document and improve this local management of records, including file tracking registers, document / version control through file naming and templates and converting documents from editable formats into PDFs.

Shared drive projects are offered and run by the Records Management team that encourage Council teams to review their access arrangements, administrative procedures and storage arrangements, particularly around email.

In terms of IT systems, the Council uses a broad range of line of business systems, which include case, asset and customer relationship management systems. The key systems currently in use are as follows:

- Confirm – Environment and transport asset management
- Covalent – Performance and risk
- Civica APP – Community safety, Licensing and Consumer protection case management
- iTrent – HR system and Payroll
- Northgate iWorld – Housing and Revenue and Benefits
- Oracle – Finance
- Oracle Solidus – Contact Centre
- SWIFT – Social Care client records (including adults, children and criminal justice clients)
- SEEMiS – Pupil, Parent and Teacher system
- Uniform iDox –Planning

These produce audit trails for information created in them. In particular, all movements of and changes to adult social work case files are recorded within the relevant line of business

IT system (SWIFT). This includes information such as whether a paper files exists for that service user; who is in possession of the file including its location and transfer details and, at the end of a case, the information is used to cross-reference paper records ensuring all paper information is archived for destruction.

The Council has committed within policy to developing and implementing an audit programme of records management functionality within relevant IT systems.

Implementation of an organisation wide Enterprise Content Management solution will also improve the Council's compliance with this element in the future.

Evidence

- Records Centre
    - Screenshot of file history
    - Screenshot of file check out
    - Screenshot of file destruction
    - Data entry quality control process
- Health and Social Care
    - File archiving process
    - Case file tracking and recording on SWIFT procedure
- Output Based Specification 107; Enterprise Content Management

Areas for Improvement

AREA	ACTIONS	RESPONSIBILITIES
Compliance	• Development of functional criteria or checklist based off ISO 16175-3 *Principles and Functional Requirements for Records in Electronic Office Environments, Part 3: Guidelines and functional requirements for records in business systems* • Use this criteria to review existing line of business IT systems to identify compliance and risks	• Information Governance Unit; ICT Solutions
Culture	• Wider development of records management manuals across the Council to spread best practice around record control • Work with the Council's ICT Solutions and Commercial and Procurement Services to review IT system procurement standard	• Information Governance Unit • Information Governance Unit; Commercial and Procurement Services; ICT

	requirements around audit functionality	Solutions
Technical	• Implementation of ECM solution with records control and audit functionality will significantly improve audit trails for unstructured electronic records	• IT provider; ICT Solutions; Information Governance Unit
Training and Awareness	• Inclusion of file tracking within wider information governance training programme	• Information Governance Unit; Organisational Development

Element 12 – Competency framework for records management staff

Empowering our staff with the right skills and support is critical to their own personal development and the continued progress and success of the Information Governance Unit

Kevin Wilbraham, Information Governance Manager

Overview

Established in 2013 by the centralisation of existing posts and the creation of new positions, the Council's Information Governance Unit is a section of eighteen committed information governance professionals covering archive management, records management, data protection and freedom of information compliance. Each team has officers qualified in their respective areas and a manager with relevant experience and qualifications. All staff are supported in professional development through the Council's Performance Review and Development process.

The Information Governance Manager, Archives Services Manager, Data Protection Manager and Records Manager are all professional members of the Archives and Records Association, as are the rest of the archives and records management staff of the Council. The Council is also a corporate member of the Information and Records Management Society. Both the Information Governance Manager and Records Manager routinely attend the Archivists for Scottish Local Authorities Working Group and other professional archives and records management events in Scotland and the rest of the UK.

The Data Protection Manager routinely attends the Data Protection sub-group of the Society of Local Authority Lawyers and Administrators in Scotland (SOLAR) and the Information Security Officer represents the Council for the Scottish Local Authorities Security Group, a Warning, Advice and Reporting Point (WARP) for Scottish local government information security managers.

The Information Security Officer also maintains membership and contributes to the Cyber-security Information Sharing Partnership (CiSP), part of CERT-UK. This is a joint industry government initiative to share cyber threat and vulnerability information in order to increase overall situational awareness of the cyber threat and therefore reduce the impact on UK business

The information governance annual plan, approved and monitored by the Information Council, sets out the priorities and outputs each year for the Information Governance Unit, with different strands for:

- Information Governance
- Archives
- Data Quality
- Information Compliance
- Information Security
- Information Sharing
- Records Management

In addition to the Information Governance Unit, heads of service are designated as information asset owners and can appoint staff as data stewards. These roles have specific responsibilities around the management and use of Council information assets.

The Council also recognises that records management is the responsibility of all staff more generally. Since 2012 there has been a specific records management e-learning module available for staff but this has been replaced in July this year by an information governance e-learning module that is now mandatory for all staff to complete on an annual basis. It covers topics such as:

- Security
- Data quality
- Importance of records management manuals
- Storage and disposal
- Information access rights

Further workshop and presentation based records management training is currently being developed for early 2016. Courses being developed include:

- Creating Good Records and Managing Them Well
- Closure, Retention and Disposal
- Records Management in IT Business Systems
- Scanning

Training for Information Asset Owners, Data Stewards and Directorate Records Officers is also being developed, as well as an additional information governance e-learning module for managers.

Evidence
- Information Governance Unit structure
- Job descriptions
  - Information Governance Manager
  - Records Manager
  - Records Management Officer
  - Project Officer (Records Management)
  - Archives Services Manager
  - Data Protection Manager
  - Information Security Manager
- Information Asset Owners; roles and responsibilities
- Data Stewards; roles and responsibilities
- Information governance annual plan for 2015 (Extract Date; December 2015)
- Information Governance (Foundation) E-Learning Module screenshots

Areas for Improvement

AREA	ACTIONS	RESPONSIBILITIES
Culture	• Expansion and development of the data steward network within the Council	• Information Governance Unit; Information Asset Owners; individual service areas
Training and Awareness	• Development of additional records management workshop and presentation based training • Development and roll out of training for Directorate Records Officers • Development and roll out of training for Information Asset Owners • Development of information governance e-learning for managers • Undertake training needs analysis for Council staff to identify groups to target with additional information governance training (e.g. social workers, contact centre staff etc.)	• Information Governance Unit; Organisational Development

Element 13 – Assessment and Review

The importance of regular and objective consideration of records management policies and procedures should not be under-estimated

Magnus Aitken, Chief Internal Auditor

Overview

The Council has committed in its Records Management Policy to reviewing its approved Records Management Plan annually. This will be undertaken by the Information Governance Unit, monitored and challenged by the Information Council and ultimately reported to the Corporate Leadership Team via the Chief Operating Officer as the senior manager responsible for the plan.

Any improvement actions required by the Keeper or via our own internal reviews will be created as projects within the information governance annual plan under the Information Council's responsibility. These are likely to be led by the Council's Records Manager, but may instead be lead by the Information Governance Manager or another relevant officer (e.g. Data Protection Manager, Information Security Manager or Corporate Resilience Manager for their relevant plan elements).

The Council's Internal Audit Team has audited records management arrangements six times over the last five years, including the project to draft this Records Management Plan, and will continue to undertake relevant audits on information governance in the future.

The Council has also committed to reviewing all of its policies annually, which will include all of the policies referenced in this RMP. Most of the polices referenced in this plan will be reviewed by the Information Governance Manager before being resubmitted to committee for approval.

The Council's retention schedules have only just finished being reviewed but the intention for the future is to review groups of retention rules by function over a rolling three year period.

Resilience arrangements are reviewed every six months and full re-registration is required every three years.

More generally, the Council has developed an information governance maturity model assessment which will be implemented as a pilot in early 2016. It has been developed as an annual manager response based self-assessment of the culture and practices around information governance, including records management. The results will be reported to the Information Council and will feed into each new annual plan.

The initial pilot for this assessment will be run as part of our Internal Audit's 2016 Schools Assurance programme. This programme will see both direct and self assessment undertaken across Edinburgh schools for a wide range of governance areas, including records management. Once the 2016 programme has finished, the intention is to review and develop the information governance maturity assessment further and roll it out across the Council in early 2017.

Evidence

- [Information Governance Strategy](#)
- [Information Governance Policy](#)
- [Records Management Policy](#) – sections 4.8.1 and 6.10
- [Committee report on Policy Framework for annual policy review commitment](#)
- [Information Council Terms of Reference](#)
- Information governance maturity model assessment
    - [Schools Assurance Validation Checklist](#)
    - [Schools Assurance 2016 programme timetable](#)
    - [Individual school report on information governance - redacted](#)
    - [Governance, Risk & Best Value Committee Report on Schools Assurance programmes – 2015 & 2016](#)
- Internal Audit report on compliance work for Public Records (Scotland) Act, 2011
    - [Report – February 2015](#)
    - [Follow up progress report - 2015](#)

Areas for Improvement

AREA	ACTIONS	RESPONSIBILITIES
Compliance	• Achieve compliant status with ISO 30301: 2011; *Management systems for records*, especially in relation to sections 9 (Performance evaluation) and 10 (Improvement)	• Information Governance Unit
Culture	• Roll out of information governance maturity model assessment	• Information Governance Unit; Business Improvement
Governance and Policy	• Review Records Management Plan in light of Integration Joint Board arrangements for health and social care in April 2016	• Information Governance Unit

Element 14 – Sharing Information

Information sharing underpins so much of what we do, especially in identifying appropriate resolutions to anti-social behaviour. From early interventions to issuing ASBOs or seeking to recover possession of one of our tenancies, appropriate information sharing ensures services are delivered in the right place at the right time.

Stephen McCaig, Senior Solicitor

Overview

The Council is committed to working closely with other organisations and partners to provide an efficient and effective service. This relationship is often supported by an effective process for pooling, and/or connecting, our information resources. The sharing of personal data between the Council and other organisations is subject to formal information sharing agreements which set out the common rules adopted by the Council and other public agencies with whom it wishes to share data. They are expected to detail; the type of information to be shared, the purpose for sharing, relevant security controls including transfer and access, retention and disposal arrangements, and review date.

The Information Council is responsible for ensuring that all information sharing agreements meet the requirements of the Data Protection Act 1998, and the Information Commissioner's Code of Practice on Data Sharing. This is achieved through the Data Sharing Sub-Group that quality assures all information sharing agreements before they are signed. The Data Sharing Sub-Group reports to the Information Council which ensures that any issues can be escalated appropriately if required. The Sub-Group is chaired by the Data Protection Manager and consists of representatives from information governance and information security. A central register of information sharing agreements is maintained by the Information Governance Unit.

The Information Governance Unit is responsible for providing specialist advice and guidance regarding information sharing and will assist in the formulation of information sharing agreements as required.

There is guidance available to staff on the Orb which includes how to deal with one-off requests for disclosure of personal data. Information sharing responsibilities are also included within the Information Governance e-learning package which is mandatory piece of training for all staff.

Evidence

- Screenshot of Information Sharing Register
- Data Sharing Sub-Group Terms of Reference
- Information Sharing Protocol guidance
- Pan Lothian Data Sharing Protocol

Areas for Improvement

AREA	ACTIONS	RESPONSIBILITIES
Culture	• Review of information sharing arrangements to ensure that the recording system is appropriate and fit for purpose.	• Information Governance Unit
Training and Awareness	• Revise and roll out information sharing guidance to take into account organisational and structural changes as well as ICO audit recommendations • Inclusion of information sharing responsibilities in the planned e-learning information governance module for managers	• Information Governance Unit; Organisational Development

Further Information

For further information about the City of Edinburgh Council's Records Management Plan, please contact **Henry Sullivan**, Council Records Manager at:

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