RECORDS MANAGEMENT UPDATE

Executive summary

1. The purpose of this paper is to update Leadership Group on current records management activities of note. Contact: Gordon Hobbs, Information Manager (86229)

Issues and Options

Transfer of historical records to National Records of Scotland

2. Reviews of Session 1 historical records containing personal information and legal advice have largely been completed. Records to be deposited with National Records of Scotland (NRS) that contain personal information will be closed for a period of up to 100 years, records containing legal advice will be closed for 15 years following transfer (30 years in total).

3. Open historical records are being reviewed by IMG and NRS archivists have been consulted to ensure the transfer of records can go ahead as planned in November 2018.

4. Open historical records will be accessible to the public from NRS from 01 January 2019.

Public Records (Scotland) Act – Progress Update Report

5. A Progress Update Report (PUR) is due to be submitted to the Keeper of the Records of Scotland by November 2018 in fulfilment of our obligations under the Public Records (Scotland) Act (PRSA) 2011.

6. This is a voluntary system for providing annual updates on our implementation of the Records Management Plan (RMP), agreed with the Keeper in 2014 (updated in 2017). This is one method of complying with the requirement under the PRSA to keep our RMP under review.

7. The PUR being submitted confirms that the planned activities, detailed in the RMP, are progressing well. Key areas of progress are summarised below:

- Planned activity 3.1 – The Records management strategy and Records management policy were updated and signed off by Leadership Group.
- Planned activity 4.1 & 4.2 – The business classification scheme (BCS) has been updated and guidance implemented. The BCS continues to demonstrate that the SPCB classifies records series on the basis of the functions and activities from which they are created.
- Planned activity 5.1 – The Records retention schedule has been updated to reflect the BCS and current legislative and business requirements.
- Planned activity 5.2 – Procedures and guidance have been updated to reflect new processes following implementation of SPShare.
• Planned activity 6.1 – Destruction process and arrangements have been documented in the Records management procedures following implementation of SPShare.
• Planned activity 6.2 – Irrevocable deletion of records in SPShare continues to be implemented. The retention of backups, which include digital records, is in the process of being reviewed, to ensure irrevocable deletion while satisfying disaster recovery requirements. This activity is planned to be completed prior to the submission of the 2019 RMP.
• Planned activity 9.2 – Roles for overseeing and maintaining access restrictions to protectively marked content in SPShare have been assigned as business-as-usual.
• Planned activity 12.1 – All staff have been trained on use of SPShare and system-specific training has been developed and implemented. Business-as-usual records management training has also been developed and implemented.
• The PUR also details recent progress made with GDPR compliance.

8. RMPs are required to be submitted and reviewed by the Keeper every 5 years. They contain a 5 year plan of activities to maintain and improve our records management function and are therefore a more significant activity than the annual PUR updates. The SPCB’s next RMP will be requested in 2019.

Progress update

9. Implementation of the SPShare document retention policy is ongoing. Due to unforeseen circumstances the timetable for implementation had to be revised. IMG will take steps to re-engage with remaining business areas to develop a plan for implementation over the next year.

<table>
<thead>
<tr>
<th>Fully implemented</th>
<th>Partially implemented</th>
<th>Not yet implemented</th>
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<tbody>
<tr>
<td>BIT, CE, Committee Office, MRO, Official Report, PIP, Procurement, Security, Solicitor’s Office, SPCB, SPICe, Visitor Services, Web and Social Media</td>
<td>Allowances, Broadcasting, Chamber, EET, Finance, FM, IRO, Officeholders, Outreach, PO Office, PPO</td>
<td>Business Continuity, Internal Audit, IMG, HR, ACE/Gp Heads</td>
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Documents and communications retention policy

10. The expansion of the existing Document retention policy statement, (from within the wider Records management policy) to include communications, establishes a standalone policy (Annex A) which sets out our drive to manage documents and communications to ensure information isn’t retained longer than required.
11. The policy complements the SPCB records retention schedule and does not alter the retention period for records. The policy applies to information not subject to the records retention schedule. The main change involves establishing retention policies for information where manual staff management has been the norm.

12. No automated retention policies are currently applied to digital communications held outwith SPShare. Staff are instructed to move records captured in other systems e.g. Outlook, to SPShare where they can then be managed or to avoid using these systems when records are likely to be created. This, however, is not yet routine.

13. The policy will assist in changing behaviour – preventing excessive retention and reducing the reliance on local storage, mailboxes etc., which moves the focus to corporate storage of information in SPShare and the application of corporate retention policies.

14. GDPR requires robust processes for the retention and disposition of personal information and FOISA applies to all information held in recordable form. With no automated retention policies currently applied to digital communications there is a risk that information is retained within, for example, mailboxes etc. beyond the purpose and period it was originally retained for.

15. The RMP submitted to the Keeper of the Records of Scotland contains a commitment (planned activity 9.1) to ensure that as many digital records are managed in SPShare as possible to satisfy retention and data protection requirements. This policy supports this objective by reinforcing that SPShare is the key long-term repository for public records.

16. If this new policy is endorsed, the timeline for implementation will be developed in consultation with all business areas and will follow on from the completion of the implementation of the document retention policy.

17. The introduction of this new standalone policy also gives us the opportunity to reaffirm professional standards and appropriate use of communication systems. The Acceptable use of IT policy will be updated in consultation with HR and BIT, who have already been engaged with, with the intention of bringing the policy back to LG for signoff.

**Changes to IT backup retention**

18. In fulfilment of our commitment (RMP planned activity 6.2) to ensure the irrevocable deletion of records and to continue to satisfy data protection and other obligations, an activity to explore a change to the way we retain data backups is underway.

19. The purpose for retaining backups is shifting from restoring incorrectly deleted items to instead focusing on organisational resilience – keeping backups that permit the resumption of business.

20. It is recommended that the Resilience Board is the decision-making forum for changes to this process.
Resource Implications

21. Activities concerning the management of records are business-as-usual for IMG and there is currently no requirement for additional resource.

22. BIT resource will be required to implement any retention policies across our communications platforms.

23. Business areas may need to ensure any records still held in these (communication) platforms are transferred to SPShare prior to implementation.

Dependencies

24. The implementation of the Documents and communications retention policy is being implemented in 2 stages. The application of the policy is dependent on the completion of the document retention policy which will establish the policy as business as usual in SPShare prior to wider rollout.

Governance issues

25. The Information Manager will continue to manage the activities referred to in this paper as business-as-usual activities.

Publication Scheme

26. This paper may be published in line with the SPCB’s publication scheme.

Communications

27. MRO has been informed of activities in the historical records review and NRS will liaise with MRO prior to any activity to publish information concerning Scottish Parliament historical records.

28. Colleagues in BIT, IMG and Solicitor’s Office have been consulted to ensure retention periods detailed in the Documents and communications retention policy satisfy requirements.

Next steps

29. The Information Manager will continue to work with NRS to ensure transfer arrangements are successful.

30. The Progress Update Review will be submitted to the Keeper of the Records of Scotland.
31. IMG will engage with remaining business areas to continue to implement the document retention policy. Offices will also be consulted in the drawing up of plans to embark on the implementation of the wider communications policy across the SPS.

32. The Information Manager will work with HR and BIT colleagues to revise the *Acceptable use of IT policy* to ensure it remains up-to-date.

33. The Information Manager will work with BIT colleagues and the Business Continuity Manager to develop a backup regime sufficient for business continuity and present it to the Resilience Board for signoff.

**Decision**

34. LG is:

   34.1 invited to note the continuing efforts to transfer Session 1 historical records to NRS;

   34.2 invited to agree to the implementation of the *Documents and communications retention policy*, approved by the Head of Digital Services, which will be fully implemented following the successful implementation of the policy in the remaining areas of SPShare; and

   34.3 invited to note the proposed changes to the IT backup regime and to agree to the Resilience Board acting as the decision-making authority for changes.

*Information Management and Governance*  
*October 2018*