

SDS Records Management Policy

Descriptor	Changes made	Date	Version
Policy first implemented	-	Feb 2014	1.0
Review no.1	Updated content	Feb 2015	2.0
Review no.2	Revised scope; approved IGISG 22/01/2019	Q3 2018	3.0
Review no.3			

Name of policy being superseded (if applicable)	SDS Records Management Policy v2.0
Related policies	Related SDS policies and guidance can be found on <i>Connect</i> , under Records Management in the Resources area.
Related SOPs	None
Related Guidance	Related SDS guidance can be found in the Resources area of <i>Connect</i> , under Records Management and IShare
Equality Impact Assessment completed	Yes. We have reviewed this document with the Equality Team and concluded that there will be no need to complete the EqlA for this policy, as any system accessibility issues related to disabled groups will be covered by other projects' impact assessments, such as Office 365.
Intended Audience	All SDS staff
Team responsible for policy	Information Governance team, within Corporate Office
Policy owner contact details (email)	Kenneth Parker
Policy due for review (date)	March 2020

Contents

SDS Records Management Policy.....	1
1. Policy summary.....	3
2. Policy purpose and objectives.....	4
3. Strategic context.....	4
4. Definitions.....	5
5. Scope.....	7
6. Policy detail.....	7
7. Further guidance.....	9
Annexe A – Retention and disposal.....	10

1. Policy summary

The requirements for records management practices at SDS are presented, providing an explicit organisational commitment to the effective management of SDS information and records. It informs staff of their obligations throughout the information lifecycle as well as of the importance of records management to achieving SDS's business objectives. Details are given of the recommended record retention periods and the action that must be taken at the end of that period.

The policy applies to all information in all formats received, created, and maintained by all staff, regardless of grade, location, role or category of employment, in SDS.

It requires that:

- All information shall be managed through its lifecycle by staff, according to established retention periods
- All unstructured information shall be managed over the long-term in IShare
- Unstructured business information shall not be stored for the long term in other platforms or packages, such as Outlook or OneDrive.
- Information in SDS's enterprise information systems shall be managed in accordance with the approved guidance for each system
- Staff should declare records in line with their service's expectations
- SDS shall pass appropriate records to the NRS for permanent preservation
- Hardcopy records of value will be managed according to the SDS Hardcopy Archiving Guide

2. Policy purpose and objectives

Consistent application of good records management practices will ensure SDS's records are accessible, accurate, up-to-date, complete and secure as well as being managed and disposed of appropriately. Achieving this will deliver organisational benefits to SDS and help achieve legislative compliance.

The policy sets out good practice for creating, using, retaining, and disposing of records, defines the actions, method, and context for making decisions around the retention or destruction of records and aids staff in understanding the necessity of having the appropriate retention and disposal process.

As part of SDS's commitment to organisational excellence it is intended that SDS move from simply ensuring compliance with all applicable legislative requirements towards demonstrating leading practice in its records management.

3. Strategic context

Information is a basic and essential asset for any organisation and as with any other business asset recorded information requires effective management. Good records management enables staff to work more effectively, protects the company's legacy and reduces the risk of legal or statutory penalties while also saving time, effort, space, money and other resources.

In addition to being sound business practice, legislation is increasingly underlining the importance of good records management. Compliance with Freedom of Information and Data Protection legislation (both existing and forthcoming) is supported by effective records management; without properly organised and retrievable records, requests for information governed by statutory response timescales would be impossible to service.

Further, as a public body in Scotland, SDS has to comply with the Public Records (Scotland) Act 2011. This requires that SDS first develop and then maintain an approved records management plan (RMP), covering 14 different aspects of records management. SDS submitted its RMP to the National Records of Scotland (NRS) in early 2014. The NRS approved the plan, albeit with mandated improvements in some areas. This policy supports SDS's compliance with the Act.

In an unmanaged records environment, up to 10% of staff time is spent looking for information. The benefits of good records management include:

- knowing what records are held and being able to locate them easily
- increasing efficiency and effectiveness and supporting decision making
- increasing accountability
- helping to provide continuity in the event of a disaster
- meeting legislative and regulatory requirements, particularly as laid down by the Freedom of Information (Scotland) Act and the Data Protection Act
- protecting the interests of employees, clients and stakeholders
- making savings in administration costs, both in staff time and storage

In order to reap these benefits, it is important to understand what is and what is not a record.

4. Definitions

Recorded Information vs. Record

It is important to be clear about the difference between what recorded information is and what a record is. Recorded information is any piece of information in any form, produced or received by an organisation or person. It can include, among other things, databases, website, email messages, MS Word and Excel files, letters, video, audio, and memos. Some of this information will be ephemeral or of very short-term value and should never end up in a records management system (e.g. invitations to lunch, travel arrangements and so forth).

Some information, referred to as *records*, will need to be kept as evidence of business transactions, routine activities or as a result of legal obligations. At SDS, such information should be held in IShare, unless it better fits in one of the enterprise information systems, such as Agresso. For the records held within IShare, staff will need to *declare* each one as a record using the functionality within the system. In other words, all records start off as recorded information, but not all recorded information will ultimately become records.

Examples of what would constitute a record are where the information is held or used:

- to assess whether an accountability or responsibility has been fulfilled
 - such as contracts and annual accounts
- as part of an audit trail for decision making
 - such as the minutes of meetings, emails recording the context for decisions as well as early, draft versions of documents which were subsequently declared as records
- to compile the historical record of operations of SDS
 - any records relating to the origins and history of the authority, its organisation and procedures, functions and dissolution;
 - office notices, organisation charts.
 - sets of minutes and papers of major internal bodies such as committees, advisory bodies and working parties.
 - annual and major reports
 - principal policy documents, including any relating to preparation of legislation and submissions to Ministers and senior officials

The above are just examples but should give a broad indication of the type of document which should be declared as a record.

Any information which is used in an audit or released in response to information or data access requests become records at that point, regardless of whether normal business practice would have seen that information declared as records.

Entries within Agresso, and the other enterprise systems, do not need to be declared as records.

Vital Records

Vital Records are a subset of the information declared as records without which SDS could not continue to function and which are deemed essential for purposes of business continuity. Each business area should maintain a list within its business continuity plan of what its vital records are.

Retention Schedules

It is poor records management practice to keep everything forever. The SDS Summary Retention Schedule sets out, in general terms, how long SDS will keep different categories of information for as determined on the basis of administrative, legal, and audit needs. This includes actions for the management of information through its life cycle as well as the rules for destruction or archiving of the information and records.

The SDS Full Retention Schedule lists by business area how long different categories of information will be kept.

Business Classification Scheme

A business classification scheme (BCS) describes what business activities the authority undertakes – whether alone or in partnership. It usually takes the form of a hierarchical model or structure diagram. It records, at a given point in time, the informational assets the business creates and maintains, and in which function or service area they are held.

For SDS the BCS also forms the basis for the structure within IShare, its electronic document and records management system.

Disposal Arrangements

At the end of a retention period, as agreed in the retention schedule (Annexe A), information should be reviewed to determine what happens to it next, i.e. its disposition. In some cases, the decision may be to destroy the information as it is no longer of value to SDS. Conversely, some information may still have value to either SDS or the National Records of Scotland and should be retained or transferred accordingly.

Archiving

The vast majority of SDS's information is held electronically and will be archived electronically, through whichever software process or tool is appropriate for the information.

Arrangements for archiving hardcopy information are detailed in the SDS Hardcopy Archiving Guide.

Information Asset

An information asset is a specific body of information, defined and managed as a single unit so it can be understood, shared, protected, and exploited effectively. Information assets have recognisable and manageable value, risk content and lifecycles.

Information Asset Owner

The Information Asset Owner (IAO) is a role mandated by UK Central Government and can focus on personal or operation data. The IAO manages the information assets to comply with agreed policy. In turn, such policies must reflect the statutory obligations arising from, amongst others, the Public Records (Scotland) Act 2011, the Freedom of Information (Scotland) Act 2002, the Data Protection Act 1998 and, from May 25th, 2018, the General Data Protection Regulation (GDPR).

Records Management

The field of management responsible for the efficient and systematic control of the creation, receipt, maintenance, use and disposal of recorded information and the classification and management of information classified as records. This includes the processes for capturing and maintaining evidence of and information about business activities and transactions in the form of that information classified as records.

Soft-copy

Any file stored in IShare can be considered a 'soft-copy' file, which means it is stored and accessed electronically e.g. a Word document on your desktop or on IShare. These are occasionally also referred to as electronic records or born-digital records.

Digitisation

The process of producing an electronic version, often as pdf or tif files of a hard-copy file by, for example, scanning a document.

EDRMS

The electronic document and records management system (EDRMS) is a software tool used to manage documents and records throughout the document life-cycle. At SDS this refers to the IShare Online system.

Permanent Preservation

Continuous and indefinite preservation of records. For SDS this means transfer of records to the National Records of Scotland who will manage the preservation.

5. Scope

The policy applies to all information in all formats received, created, and maintained by all staff in SDS in the course of their work and provides an explicit organisational commitment to the effective management of SDS records and associated information management functions.

There is no information managed at SDS to which the principles and aims of this policy do not apply. The policy applies to all SDS staff, whether part-time, full-time, permanent, a contractor, temporary or seconded.

6. Policy detail

It shall be SDS policy that:

- All information, regardless of format (including emails), shall be managed through its lifecycle by staff in accordance with established retention periods
- At the end of the relevant retention periods, files will be reviewed as per the retention and disposal guidance (Annexe A)
- All unstructured information shall be stored for the medium to long term within IShare Online which is structured following the agreed business classification scheme.

- Personal and shared drives, email in-boxes along with One Drive and Yammer are inappropriate for the long-term storage of SDS corporate information and shall not be used for such purposes. They are only appropriate for short-term working documents.
- All structured information with SDS's enterprise information systems shall be managed in accordance with the approved guidance for each system
- Staff should declare records in line with their service's expectations
- Hardcopy records of value will be sent to offsite archive
- SDS shall develop then maintain an understanding with the National Records of Scotland (NRS) over what records shall be passed to the NRS for permanent preservation

The policy detail shall be reviewed against the evolving business requirements to share information and collaborate with external partners and how the use of the Office 365 suite could be developed to meet those requirements.

Roles & Responsibilities

Chief Executive & the Directors

The Directors Group (DG) collectively, headed by the Chief Executive as the Accountable Officer, has overall accountability for approving SDS Records Management Policy and Procedures and for ensuring their application throughout the organisation. The DG may choose to delegate such approvals to an appropriate body. Further they have the responsibility of setting an example, through everyday leadership, to remind the whole organisation of the importance of records and good records management

Heads of Service

Heads of Service are responsible for ensuring that their service complies with the records management policy and should encourage good records management practice. Some Heads of Service have been identified, trained and guided to take ownership of information assets so that all business-critical information assets have clear ownership.

Information Asset Owners

Information asset owners are responsible for ensuring the availability and integrity of information made available to staff through the supporting business processes. An Information Asset Owner (IAO) is a mandated role, the individuals appointed as IAOs are responsible for ensuring that specific information assets are handled and managed appropriately. This means making sure that information assets are properly managed, protected and that their value to Skills Development Scotland is fully exploited. IAOs can delegate responsibility to particular areas that can support them in their role but the IAO retains accountability for proper information management and handling.

Information Governance (IG) team

The management responsibility for coordinating records management policy and procedures as well as promoting, monitoring, and reporting compliance with the policy lies with the Records Management team within the Corporate Office. This may include reviews and audits of records and developing and promoting good practice and procedures with all staff. The IG team shall own the relationship with the relevant team at the National Records of Scotland. The IG team shall report to the appropriate cross-directorate body, currently the Information Governance Scrutiny and Improvement Group (IGSIG), on the implementation and compliance with RM policies.

Records Management Champions

Designated Records Management Champions (RMCs) from business units across the organisation have greatly assisted the development of the framework for IShare – in terms of the file plan, retention schedule and permissions settings. It is envisaged that the RMCs shall continue to have a role in the use of IShare, as local super-users. In that role they would be able to guide and coach staff in the use of IShare, as well make minor alterations to the local file plan and manage the permissions settings. The RMCs shall, with support from the Information Governance team, be responsible for promoting good records management practices.

SDS Staff

All the staff within SDS has a responsibility for all records that they use, manage, receive and dispose of and should ensure they follow the records management policy. They must ensure that all records are managed and disposed of according to all relevant SDS policies and should ensure that information is up to date and accurate. They must ensure that all records are managed in accordance with SDS's Retention schedule and information classification and handling policy.

7. Further guidance

Colleagues are referred to [Connect](#) for guidance relating to the information lifecycle, its bearing on day-to-day work and a description of what how records management practices can benefit SDS.

Annexe A – Retention and disposal

When we hold information within SDS there should be a rationale or justification for doing so, this provides the basis of a retention schedule which lays out how long information should be kept and the rationale for that period which then provides a defensible position. SDS has produced a Business Classification Scheme (BCS) which set out the categories of functions, activities and records we currently keep which is regularly re-assessed.

The Schedule is intended to be as wide-ranging as possible and all SDS functions are included in it. The retention schedules contain information of specific record types and either minimum recommended periods that those records should be retained for, or their appropriate retention period based on legal and regulatory requirements.

The retention period specified in the Schedule does not mean that the document or information should, without exception, be destroyed or deleted after the set date. The retention period specifies the latest date to re-evaluate the information. At the end of the retention period there should be a decision point around either retaining the specific records longer, because there is a justification for doing so, or to dispose of them either by destruction or deletion. As a result, at the end of a retention period SDS staff should:

- a) evaluate the business value of the records / information then;
- b) if applicable, set a further retention period or;
- c) move to their disposal action.

Owners of the records should ensure that these records remain accessible for as long as required and are managed appropriately throughout their lifecycle.

There are four procedures to follow concerning the disposal of your records once they have reached the end of their recommended retention period, three of which SDS use:

Destruction or deletion of records

- If the records are no longer required for business purposes and have been retained for the recommended retention period, in line with any legislative or statutory obligations, the record should be destroyed or deleted.
- The retention period in the Schedule stipulates the length of time the records should be retained. Unless they are subject to a review or an exemption, records should be destroyed within the prescribed timescale. This includes backup copies stored on alternative media.
- If you only have a convenience copy of a document and did not create or do not have responsibility for it, then you should destroy it appropriately as soon as you no longer require it.
- The same retention and disposal procedure is applied to all documents within the EDRMS, even if they are never formally declared as records

i) Permanent preservation of records held in IShare

- All records that are of potential historical value should be transferred to the appropriate archive repository for permanent preservation, once their local administrative use is concluded.
- For electronic records held in IShare this will mean the transfer of records to the National Records of Scotland (NRS), once the NRS has defined its accession process.

iii) Off-site archiving for hard-copy records

Hard-copy records should be stored in the off-site archive which;

- need to be retained in their original format (as for example contracts over £50,000);
- there is a legal or business requirement to retain;
- or are of historical value;

The appropriate process, as per the SDS Hardcopy Archiving Guide, for sending material to off-site archive should be followed.

iv) Digitisation

Creating digital versions of hard-copy records to fulfil legislative and business requirements on the retention of those records is an option however,

- The cost of digitising records in a way that makes them reliably accessible is high;
- There is also the possibility that the digitised files may never actually need to be accessed, as they are only being retained for the appropriate retention period to fulfil legislative requirements.

For these reasons the routine digitisation of hard-copy records is not part of SDS's records management policy.

Automated Retention and Disposal

All unstructured information will be stored in the EDRMS for the medium to long term.

When you create any document, it goes through a lifecycle (see the RM Guidance section of Connect for more details). For documents held on the EDRMS this process is automated. Every record type on the schedule has a retention period assigned to it. It must be kept for the requisite retention periods as decided by relevant legislative or business requirements. Not following retention periods can put the organisation at risk.

Retention Periods

The default retention period for corporate documents and records is 4 years. This has been implemented within IShare as a live period of 3 years – i.e. the file will be visible in the file listing for 3 years from its last edit or from when it was declared as a record – followed by a year in 'archive', where the file is hidden in the default view.

There are obviously strong reasons to keep some categories of information for longer than this default. The major ones are listed in the table below.

The full corporate retention schedule will be made available in two parts

1. Retention periods as implemented within IShare Online
2. Retention periods as given for the major information assets and held in other corporate systems

A summary of Part 1 is given below. The corporate retention period is 4 years and applies to all information held within IShare, except where explicitly noted in the table. Some entries are in two parts, a period of years followed by 'NRS'. This indicates that that information type may be passed to the National Records of Scotland (NRS) for permanent preservation. The full details of what SDS information will fall into that category have yet to be formally agreed with the NRS. Several business areas hold records relating to ESF funding. The retention details for those records are more complicated as the information has to be held for a number of years after the end of the programme they relate to. This

type of conditional retention period is technically challenging to implement and so has been done simply as long period.

The details in this table are subject to change, following consultation with a business area. The version incorporated into the policy will be updated annually, even if there no other changes to the policy details. The live version of the annexe can be found on Connect (see Section 7). It will be updated as and when any substantive changes are agreed.

Summary of retention values within IShare

Corporate retention period for all information is 4 years and applies across IShare Online, except where noted below.			
Department	File Type	Retention Period	Notes
Audit and Compliance	Investigations	8	
	Programme Rules	8	
Corporate Affairs	Ad hoc Projects with SG	10	
	Stakeholder engagement with local authorities & Community Planning Partnerships	5	
Corporate Office	Board Records	20 / NRS	
	Senior Management Meetings	10 / NRS	
	Papers via correspondence for the above groups	10 / NRS	
	Programme Boards	10 / NRS	
	SDS-SFC liaison	10 / NRS	
	Register of Interests	12	
	Business Continuity	10	
	Data Protection (SARs)	7	
	Information Governance Forums	6	
	PRSA compliance, NRS correspondence	6	
CPPR	Archiving Indices	8	
	SG Liaison Groups	10 / NRS	
	Raw Data Input	9	
	Corporate Reporting	9	
	Official Stats (reports)	6	
	Service Workplans/CIAPs	6	
	Team Resources	6	
	Corporate Plan & Performance Framework	6	
	Operating Plan	6	
Planning Processes and Workplans	6		
Digital Services	Content Development and Management	6	
	Analytics	6	
	Contact Centre Management	6	

Corporate retention period for all information is 4 years and applies across IShare Online, except where noted below.			
	ILA / ITA Transition	6	
	Reporting	6	
	Contracts	6	
	Directorate Plans & Reporting	6	
	Interact Project Development	6	
Employer Services	Employer Engagement Projects	8 if ESF	ESF programme rules apply but implemented as 10
	FTO/ LCSF	10	
Evaluation and research	Data relating to Longitudinal Studies	11	
F&A MAs	If ESF funded	8	ESF programme rules apply but implemented as 8
	Everything Else	5	
Finance	ESF	8	ESF programme rules apply but implemented as 8
	Accounts & Payroll	7	
	Budgets & Reporting	8	
HR	Equality Advisory and Management Groups	11	
	Compensation/ Benefits/ Reports/ Payroll	7	
	Terms and Conditions	10	
	Recruitment Activity	2	
	Relating to Temp Staff	7	
	Budgets & Remuneration	7	
	RHR Records	Perm	
Legal	Advice Records	5,6 and 10	Depends on topic
NTP Development	Equal Opportunities & Regional Equalities	6	
	Quality Enhancement	6	
	Development Work	6	
	CPD Academy	6	
	Health and Safety/ Accident Reports	up to 6	
NTP Operational Delivery	Head of & SMT	6	
	EF & MA Contract Management	6	
	Commissioning	6	
	Work Able Scotland	6	
	Provider Risks	6	

Corporate retention period for all information is 4 years and applies across IShare Online, except where noted below.			
NTP Partnership	Adopt An Apprentice	5	ESF programme rules may apply
	European Fund (TS)	6	
	Scotland's ERI (SERI)	6	
	Provider Files	6	
NTP Reports & Funding	CTS Documents	6	ESF programme rules may apply
	Procurement Info and Processes	5	
	FIPS Docs	6	
	Reporting Tools & Guidance	5	
	Commissioning	10	
	Reports	10	
NTP Team	Standards	6	
	Agendas and Minutes	6	
	Complaints	6	
	Managers' Group	6	
	Workplan	6	
NTP SMT	General Information	6	
SAAB	General Information	6	
Procurement	Registers	7	ESF programme rules apply but implemented as 10
	Grants and Successful Bids	7	
	Unsuccessful Applications	3	
	ESF Projects	10	
Property & Facilities	Carbon Footprint	6	
	Energy Data	6	
	Local Finance	6	
	Projects	6	
	Recycling	6	
	Reference Documents	perm	
	Reporting	perm	
	Travel Data	6	
	Estates Approvals	perm	
	Strategy	6	
	Statutory Test Data	perm	
	MITIE	6 from End Of Contract	
	Procurement	6 from End Of Contract	
	Local Finance	6	
	Leases & Letting Records	perm	
Project Management	6		

Corporate retention period for all information is 4 years and applies across IShare Online, except where noted below.

QA& Improvement	Internal Assessments	6	
	External Review	10	
	Education Scotland Reports	perm	
Risk & Internal Audit	IA Reports	10	
	Everything else	5	
SD&I	PM Docs	9	
	Service Definition	9	
	Apprenticeship Frameworks	5	
	Registration/Monitoring Forms	perm	
	Research Output	5	
	CWBL Management & Compliance	perm	
	Management Information including HR & Recruitment	9	
	Project Templates & Toolkits	9	
SMT Working Docs	9		