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South Ayrshire Council and South Ayrshire Licensing Board Records Management Plan March 2017

Setting out the proper arrangements for the management of the authorities' public records under Section 1 of The Public Records (Scotland) Act 2011.

Document Control

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Version	Date Issued	Last Review Date	Author(s)	Update Information
1.0	30/03/2017		Naomi Hanna, and Deborah McVey	Version for submission.
1.1	28/08/2017	30/03/2017	Deborah McVey	Inclusion of additional Assessment & Review Evidence and clarification of Council's contract responsibilities under PRSA.

Contents

Introduction

The Public Records (Scotland) Act 2011 (hereafter referred to as 'the Act') came into force in January 2013. The Act obliges South Ayrshire Council and other public authorities to prepare and implement a Records Management Plan (RMP). The RMP sets out proper arrangements for the management of records within the Council.

The South Ayrshire Council Records Management Plan is based on the Keeper's published Model Records Plan. The model plan has 14 Elements:

Element 1: Senior Management Responsibility

Element 2: Records Manager Responsibility

Element 3: Records Management Statement

Element 4: Business Classification Scheme

Element 5: Retention Schedule

Element 6: Destruction Arrangements

Element 7: Archiving and Transfer Arrangements

Element 8: Information Security

Element 9: Data Protection

Element 10: Business Continuity and Vital Records

Element 11: Audit Trail

Element 12: Competency Framework for Records Management Staff

Element 13: Assessment and Review

Element 14: Shared Information

This Plan relates to records throughout their lifecycle, from creation and acquisition to archive and destruction. It encompasses all records across all Council service areas, whether electronic or physical. The plan also incorporates records held by South Ayrshire Licensing Board. The plan excludes Joint Boards who, under the Act have chosen to submit individual RMPs.

The following plan demonstrates the intent of South Ayrshire Council and South Ayrshire Council Licensing Board (hereafter together referred to as 'the Council') to be committed to continuous improvement in the way in which both manage and use their records. Therefore, this plan will be regularly and formally reviewed, in order to report to the Keeper on the adoption of each element of the scheme. The review and assessment arrangements are explained more fully in relation to Element 13.

Element 1: Senior Management Responsibility

Identify person at senior level who has overall strategic responsibility for records management.

1.1   The confirmation of senior management responsibility for the Records Management Plan is a compulsory element under the Public Records (Scotland) Act 2011. The Senior Manager who has overall strategic responsibility for records management is Eileen Howat, Chief Executive of the Council:

Eileen Howat
Chief Executive
South Ayrshire Council
County Buildings
Wellington Square
Ayr
KA7 1DR
Tel: 01292 612612
Email: eileen.howat@south-ayrshire.gov.uk

1.2   The Senior Manager who has overall strategic responsibility for records management within the South Ayrshire Licensing Board is Ralph Riddiough, Clerk to the Licensing Board and the Council's Head of Legal and Democratic Services:

Ralph Riddiough
Clerk to South Ayrshire Licensing Board &
Head of Legal and Democratic Services
County Buildings
Wellington Square
Ayr
KA7 1DR
Tel: 01292 612245
Email: ralph.riddiough@south-ayrshire.gov.uk

1.3   As recognition of the importance of senior management championing good records management practice, the Chief Executive fully endorses the Records Management Plan and takes senior responsibility for the full compliance and implementation of the records management procedures detailed in this Plan across the Council. The Clerk to the Licensing Board confirms that South Ayrshire Licensing Board supports Board records being managed by the Council and incorporated within this Plan. The Clerk to the Licensing Board fully endorses the Records Management Plan as evidence of the Board's compliance with the Act.

1.4   The Chief Executive will ensure, when required, improvements to records management procedures are implemented corporately and monitored by the Records and Data Officer through the assessment and review process.

Evidence:

1.   Appendix 1: SAC E01 - Letter of Responsibility from Eileen Howat, Chief Executive of South Ayrshire Council dated 30th March 2017
2.   Appendix 2: SAC E02 – Letter of Endorsement from Ralph Riddiough, Clerk to the South Ayrshire Licensing Board and South Ayrshire Council's Head of Legal and Democratic Services dated 20th March 2017

Element 2: Records Manager Responsibility

Identify individual within the organisation, answerable to senior management, to have operational responsibility for records management within the organisation.

2.1   The confirmation of operational management responsibility for the Records Management Plan is a compulsory element under the Public Records (Scotland) Act 2011. The Records Manager who has senior accountability for the day-to-day implementation and compliance with this Plan is Deborah McVey, Team Leader (Information Governance):

Deborah McVey
Team Leader (Information Governance)
Legal and Democratic Services
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County Buildings
Wellington Square
Ayr
KA7 1DR
Tel: 01292 612195
Email: deborah.mcvey@south-ayrshire.gov.uk

2.2   The Team Leader works in close collaboration with the Records and Data Officer, and the Co-ordinator (Registration, Records and Information).

Evidence:

1.   Appendix 3: SAC E03 - Job Description: Team Leader (Information Governance)

Element 3: Records Management Policy Statement

A Records Management Policy Statement underpins effective management of an authority's records and information. It demonstrates to employees and stakeholders that managing records is important to the authority and serves as a mandate for the activities of the records manager.

3.1   The Council's commitment to effective records management is set out in the Records Management Policy Framework, which was approved by South Ayrshire Council on 12th May 2016. The Policy confirms that all records created and received during the conduct of Council business, and all information systems used to create, hold and manage records, must be subject to robust records management policies, procedures and best practice. The Policy provides the overarching framework for any other supporting Council records management policies, practices or guidelines. All Council records should be accurate, reliable, secure, managed and disposed of appropriately, regardless of their format.

A commitment to effective records management will allow the Council to meet all of its statutory, regulatory, administrative and accountability requirements including the Council's compliance with the Public Records (Scotland) Act 2011. The Policy Framework also recognises the importance of ensuring that all members of staff and Councillors understand their responsibilities in relation to the information they produce and handle. The Policy Framework is available on both the internal intranet and the external public website at: https://www.south-ayrshire.gov.uk/foi/policy.aspx ensuring all stakeholders can easily access the Council's key records management policy.

3.2   The Records Management Policy Framework is based on the following principles:

"Effective records management delivers the following significant benefits:

(i)   it allows the Council to know what records it has, and how to locate them easily;
(ii)   increased administrative efficiency and effectiveness;
(iii)   improved information security as records are accessed on the 'need to know' principle;
(iv)   improved transparency and accountability;
(v)   improved achievement of business objectives and targets; Supports decision making;
(vi)   improved compliance with legislation or guidelines governing the retention of local authority records;
(vii)   identification, at the earliest possible moment, of records with historical value for permanent retention as archives; and
(viii) improved compliance with legislation such as the Freedom of Information (Scotland) Act 2002, Environmental Information Regulations 2004, and the Data Protection Act 1998"

Evidence:

1. Appendix 4: SAC E04 - South Ayrshire Council Records Management Policy Framework
2. Appendix 5: SAC E05 - Extract of Minute of South Ayrshire Council Meeting approving Records Management Policy Framework, dated 12th May 2016
3. Appendix 6: SAC E06 – South Ayrshire Council Records Management Intranet Area Screenshot

Element 4: Business Classification Scheme

A Business Classification Scheme describes the functions the authority undertakes – whether alone or in partnership.

4.1   South Ayrshire Council has developed a business classification scheme which encompasses all the functions of the Council, arranged into relevant functions and activities. The scheme is based on and operates in conjunction with the Scottish Council on Archives Records Retention Schedule (SCARRS), which the Council is actively adapting to suit its needs. This function based business classification scheme ensures consistency within records management despite any future changes to the structure of the organisation. The Council recognises that any business classification scheme must accurately reflect each and every business need of each service area. As such, members of the Information Governance team, in particular the Records and Data Officer are consulting closely with each service area in order to ensure each function and relevant activity is recorded under the business classification scheme. This will also ensure that services understand the changes that will need to be made in shifting records management practices to a functional structure, rather than an organisational structure.

4.2   The Council recognises that a comprehensive business classification scheme is crucial to compliant records management for records held in all formats. With the increase in electronic records in recent years, effective records management must take into account the classification, storage, retention and audit of electronic records as well as paper records. This Plan recognises that work is ongoing to fully implement the functional classification scheme for both paper and electronic records, particularly in terms of rationalising the process of staff storing unstructured data in electronic records in multiple different shared drives. The Council is committed to scoping up to date and effective solutions to the management of such records and, as part of the Transform South Ayrshire programme, work is underway to undertake a scoping exercise to establish if an EDRMS solution is suitable for corporate use. This exercise is led by the ICT Project Manager, working in close collaboration with members of ICT, Information Governance, Procurement and management across the Council.

4.3   In order to implement the business classification scheme, and taking into consideration the preparation for the possible implementation of an EDRMS, the Records and Data Officer and other members of the Information Governance team are working closely with service areas to rationalise records management practice so that electronic records are stored under the structure of the business classification scheme and can be easily migrated to an EDRMS. Work is ongoing in relation to the development of file naming conventions, including piloting the conventions in a number of service areas. The Records Management Service is currently meeting with Chief Officers of the Council to ensure the Business Classification Scheme, once fully developed and rolled-out corporately, will be implemented throughout every service. Guidance for managing records will be produced and circulated prior to the Scheme being fully implemented corporately, through Information Governance Representatives within Council Directorates, via the Council's Information Governance Group.

Evidence:

1. Appendix 7: SAC E07 - South Ayrshire Council Business Classification Scheme March 2017
2. Appendix 8: SAC E08 - South Ayrshire Council Example Electronic Records Management and EDRMS Presentation 2017
3. Appendix 9: SAC E09 – South Ayrshire Council Business Plan 2016-18
4. Appendix 10(a): SAC E10(a) – South Ayrshire Council Transform South Ayrshire Report to Leadership Panel, dated 14th June 2016
5. Appendix 10(b): SAC E10(b) – South Ayrshire Council Transform South Ayrshire Update Report to Service and Performance Panel, dated 21st March 2017

Element 5: Retention Schedule

A Retention Schedule is a list of records for which pre-determined disposal dates have been established.

5.1 In conjunction with the creation and implementation of a business classification scheme, the Council has adopted the Scottish Council on Archives Record Retention Schedule (SCARRS), adapting where required, to reflect the specific records produced and held.   Record retention scheduling based on the model of SCARRS was approved by South Ayrshire Council at its meeting on 6th October 2016. The Retention Schedule applies to all records created and held by the Council, in all formats. The Council recognises the statutory and business requirements to define how long records should be kept, to dispose of them when they are no longer needed for business use and to give explanation as to the decision to destroy or retain records.

5.2 Members of the Information Governance team, including the Records and Data Officer, are in the process of meeting with each service area to discuss which of the function, activity and transaction sections of SCARRS are relevant to each service area, and agree the appropriate retention period, given different business needs. This engagement with individual service areas ensures that each area is aware of their statutory requirements for records management and the importance of accurate records retention.   Furthermore, this engagement ensures that records retention is given a high priority in the services' consideration, and the involvement with individual members of staff gives service areas ownership and understanding of records management practice.   The decision to use SCARRS and the functional approach to records retention also ensures that services will understand their responsibilities despite any structural changes the Council may go through in the future.

5.3 At the time of submission, individual service area meetings are on-going.   Any agreed changes to the schedule are accepted through the Council's Records Management Service and Senior Service Managers are required to approve, i.e. "sign off", this process after establishing the business requirements behind these decisions. The schedule is maintained by the Corporate Records Management Service, overseen by the Information Governance Team Leader and the Co-ordinator (Registration, Records and Information).   To date the retention schedule has been agreed for a number of service areas within two directorates: Resources, Governance and Organisation; and the Health and Social Care Partnership. The retention schedule is published both on the external Council website at: https://www.south-ayrshire.gov.uk/foi/policy.aspx   and the internal intranet. It is a working document that is subject to amendment to reflect business functions and requirements.

Evidence:

1. Appendix 11: SAC E11 - South Ayrshire Council Records Retention Schedule March 2017

2.   Appendix 12: SAC E12 Minutes of Full Council Meeting approving adoption of SCARRS, dated 6th October 2016

Element 6: Destruction Arrangements

It is not always cost-effective or practical for an authority to securely destroy records in-house. Many authorities engage a contractor to destroy records and ensure the process is supervised and documented.

6.1   Destruction of records occurs at the end of retention periods as set out in the Council's Records Retention Schedule. The retention period stipulates the length of time the records should be retained. Unless subject to a review or an exemption, records should be destroyed within the prescribed timescale. This includes backup copies stored on alternative media. Failure to destroy such records will bring the Council into conflict with Data Protection and Freedom of Information legislation. The Council has a number of destruction arrangements in place. For the purpose of the Records Management Plan, destruction or destroyed means either the destruction of paper records or the deletion of electronic records.

6.2   Guidance on the Council's policies for the destruction of records is available on the Council's internal intranet, Re-Wired. The Council's Record Disposal Policy gives guidance for the destruction of all types of records held by the Council. E-Learning and other training modules for Data Protection and Information Security underline the importance of adhering to destruction arrangements and are required to be completed by all employees upon commencing their employment. This ensures that Council staff can understand their responsibilities for the security of records and the appropriate method and time of destruction, particularly in relation to personal information.

6.3   Regardless of the format of records, all service areas are required to keep a Disposal Schedule, detailing the records disposed of, the date of disposal, and the member of staff carrying out disposal. Decisions to dispose of records at service area level are taken by relevant Senior Management, only after the minimum retention period has been exceeded, as outlined in the relevant section of the Corporate Records Retention Schedule and where he/she is satisfied that no useful purpose can be served by further retention. Guidance to staff on the Council's requirements for the disposal of records, together with a sample recommended Disposal Schedule is available within the Disposal Policy on the Council's intranet.

6.4   A Disposal Schedule is also maintained by Records Management staff recording those records that have been disposed of at the Corporate Records Management Centre. The Corporate Records Management Service requires a Destruction of Records Authorisation Form to be completed by the relevant service area prior to the destruction of consigned records. The form is signed by the authorising service manager within the relevant service, authorising destruction of records no longer required for business purposes and that are outwith their retention period. Once destroyed, the Council's Records and Data Officer will provide confirmation to the relevant service manager of the record destruction date by using a Destruction of Records Confirmation Form.

6.5   In order to protect records that may have archival significance, these records are noted as having potential archival significance at the time of consignment via the retention schedule disposal action. The Archive Service is consulted by Records Management where the records have potential archival significance.

6.6   Additionally, the Council has prepared an Information Classification Policy and Information Classification Procedure, which are currently going through the required internal approval processes. It is anticipated that once approved this Policy and Guidelines will be provided to Council staff to allow Council information to be classified as OFFICIAL and OFFICIAL-SENSITIVE, and will assist staff in establishing where information contained within documents is of a personal, sensitive or confidential nature. The Council's current Information Classification Procedure effectively guides staff to mark documents so that the sensitivity of information contained within is immediately clear to user. Documents are currently marked as SAC PROTECT, RESTRICTED or CONFIDENTIAL and are therefore properly protected and controlled.

Paper Records:

6.7   The destruction of confidential paper records is currently contracted to a third party, Paper Shredding Services Ltd (PSS). This contract was awarded on 1st June 2015 and is for a duration of three years. This company is on the Council's Contract Register and was subject to the Council's tendering process. At the beginning of the contract a representative from Paper Shredding Services visited Council sites to set up confidential waste solutions within Council buildings and answer any questions about the services available. A Council service can contact Paper Shredding Services to arrange destruction of records, or for large Council buildings, PSS attends every two-three weeks. Records are destroyed on the premises by PSS, who will provide a Disposal Confirmation that the shredding/waste disposal has taken place, which is retained within each building. Guidance on using this service is available to all Council staff on the internal intranet through the Confidential Disposal of Records Procedure.

Electronic Records:

6.8   An exercise is being undertaken to scope a potential EDRMS solution which will ensure the timely and correct destruction of electronic records outwith retention. In addition, the activity of meeting with every service area to discuss and agree the records retention schedule will ensure that all members of staff are aware of their responsibilities to destroy records in the correct way and at the correct time. The business classification scheme will also aid the correct destruction of electronic records as records will be similarly structured by function and easily located and audited. Work is being carried out by Records Management staff, in preparation for the introduction of an EDRMS, should scoping be successful, to engage with senior management to create procedures to manage file folder structures, moving from an organisational structural approach, to a structure based on the functions of the business classification scheme.

6.9   The Council is investigating potential solutions, particularly through the rationalisation of electronic systems as part of the Transform South Ayrshire programme. One of the requirements for the scoping exercise of an EDRMS for unstructured data is that the solution will allow trained records management staff to set the rules for the retention of specific electronic records, in accordance with the retention schedule, and to set permissions for the destruction, rather than destruction being automatic.

6.10   As mentioned at paragraph 4.3 above, the Council is currently piloting proposed naming conventions for electronic records within several selected service areas, to receive user feedback on the conventions being proposed, prior to consideration for corporate use. If the introduction of standardised naming conventions is agreed it is anticipated it will also aid accurate destruction of electronic records, as records will be easily identifiable and will contain the date of creation in the file name.

Information Technology:

6.11   In addition to manual or automatic destruction of electronic records, computer hardware is suitably cleansed of any trace of records that had been stored on the device. This service is undertaken by Computer Components (North) Limited (CCL), who dispose of all components which can carry Council information to a standard that complies with UK government standards for the disposal of public sector information. CCL then provide a log of the destroyed material, which is kept by the ICT Service for audit purposes.

6.12   Records stored on network file servers or within database systems are backed up nightly. Back-ups are stored for an agreed period of time before being destroyed.

Evidence:

1.   Appendix 14: SAC E14 - South Ayrshire Council Record Disposal Policy
2.   Appendix 15: SAC E15 - Screenshot of South Ayrshire Council Information Security E-Learning Module
3.   Appendix 16: SAC E16 - Screenshot of South Ayrshire Council Data Protection E-Learning Module
4.   Appendix 17: SAC E17 - South Ayrshire Council Example Disposal Register
5.   Appendix 18: SAC E18 - South Ayrshire Council Corporate Records Management Service Destruction of Records Authorisation Form
6.   Appendix 19: SAC E19 - South Ayrshire Council Corporate Records Management Service Destruction of Records Confirmation Form
7.   Appendix 20: SAC E20 - South Ayrshire Council Information Classification Procedure 2014
8.   Appendix 21: SAC E21 - South Ayrshire Council Confidential Waste Disposal Service ITT Tender Advertisement
9.   Appendix 22: SAC E22 - PSS Contract Acceptance Letter Confidential Waste Disposal Contract
10.   Appendix 23: SAC E23 - Paper Shredding Services Award of Contract

11.   Appendix 24: SAC E24 - South Ayrshire Council Confidential Disposal of Records Procedure
12.   Appendix 25(a): SAC E25(a) - South Ayrshire Council Information Security Policy 2012
13.   Appendix 26: SAC E26 - South Ayrshire Council Protocol of Disposal of Computer Equipment 2017
14.   Appendix 27: SAC E27 - South Ayrshire Council Information Classification Policy (Proposed)
15.   Appendix 28: SAC E28 - South Ayrshire Council Information Classification Guidelines (Proposed)
16.   Appendix 29: SAC E29 - South Ayrshire Council Naming Conventions (Proposed)
17.   Appendix 30: SAC E30 - South Ayrshire Council ICT Back-up Regime
18.   Appendix 31: SAC E31 – SAC & CCL Hardware Disposal Service Level Agreement 2017
19.   Appendix 6: SAC E06 – SAC Records Management Intranet area Screenshot

Element 7: Archiving and Transfer Arrangements

This is the mechanism by which an authority transfers records of enduring value to an appropriate archive repository, specifying the timing of transfers and other terms and conditions.

7.1   In line with the Council's records retention schedule, some records are deemed to have historical significance and are to be retained permanently. Other records may be reviewed for the possibility of permanent retention, or have a sufficiently long retention period that it is efficient and effective for these records to be transferred to South Ayrshire Council's Records Management Centre until outwith retention.

7.2   The Council's Records Management Centre shares a building with Ayrshire Archives. However, the Council is committed to upgrading its Archive facilities to a purpose built archives store with offsite provision of records management storage also being considered. Any offsite provision will be subject to policies and procedures similar to those currently in place.

7.3   The Council's procedures and policies for archiving and transfer to the Records Management Centre are available on the Council's intranet.

7.3.1   Records identified as an archive, or suspected to be of an archival nature, should be brought to the attention of the Records and Data Officer in the first instance who will collect the records for appraisal by the Archivist at the Records Centre. Once appraised, the archives will then be moved to a safe and secure environment at the Ayrshire Archives Centre for permanent preservation.

7.3.2   If a service requires records to be consigned to the Records Management Centre, the Records Management team should be contacted via email to assign a consignment number. A records deposit form and a records transmittal list, detailing the contents and the retention period of each box to be transferred, should be completed by the service area and sent to the Records Management team via email. Once stored in the appropriate records management boxes, files can be transferred to the Records Management Centre.

A master transmittal list is maintained by the Records Management Service which details every record consigned to the Records Management Centre, ensuring an audit trail from consignment to destruction, so that every record can be accounted for. In the event that authorised services require records to be taken out of storage at the Records Management Centre for a period of time, a form is to be completed in triplicate, detailing the record removed, consignment number, employee requesting record and destination. These forms are kept by the employee, by Records Management staff and in the box where the record was removed. This ensures that consigned records are accounted for at all times and there is a clear audit trail for the location of the records.

Evidence

1. Appendix 32: SAC E32 - Minute of Agreement between East Ayrshire Council, North Ayrshire Council and South Ayrshire Council, appointing Joint Body of Ayrshire Archives
2. Appendix 33: SAC E33 - Ayrshire Archives Acquisition Policy
3. Appendix 34: SAC E34 - South Ayrshire Council Records Transfer and Archives Policy
4. Appendix 35: SAC E35 - South Ayrshire Council Records Management Guide to Completing Records Deposit Form and Records Transmittal List
5. Appendix 36: SAC E36 - South Ayrshire Council Records Management Example Transmittal List
6. Appendix 37: SAC E37 - South Ayrshire Council Records Management Example Records Deposit Form
7. Appendix 38: SAC E38 - South Ayrshire Council Records Management Frequently Asked Questions
8. Appendix 39: SAC E39 - South Ayrshire Council Records Management Records Disposal to Archives Authorisation Form
9. Appendix 40: SAC E40 - South Ayrshire Council Records Management Information Leaflet
10. Appendix 41: SAC E41 - South Ayrshire Council Records Management Example Triplicate Retrieval Form
11. Appendix 42: SAC E42 - Memorandum of Understanding between Ayrshire Valuation Joint Board (AVJB) and Ayrshire Archives, dated 14th and 17th March 2017
12. Appendix 43: SAC E43 – South Ayrshire Council Capital Investment Report, dated March 2017 (Ayrshire Archives upgrading)
13. Appendix 6: SAC E06 – SAC Records Management Intranet area Screenshot

Element 8: Information Security

Information Security is the process by which an authority protects its records and ensures they remain available, it also maintains privacy where appropriate and provides for the integrity of the records.

8.1   Due to the nature of South Ayrshire Council's statutory and business requirements, many of the records produced and held by the Council will contain sensitive or personal information. There may also be records that hold information which should not be amended or deleted without appropriate authority. Therefore, it is of paramount importance that the Council has a robust Information Security Policy, to avoid loss or corruption of sensitive or vital data. The Council's intranet contains a mini-site dedicated to information security, which is promoted on the intranet homepage. The Council's Information Security Policy is readily available to staff through this site, as is the Information Security Incident Management Procedure. The Information Security Policy sets out how the Council ensures the "confidentiality, integrity and availability of information assets, whilst minimising business damage through the implementation of controls and procedures".   Information Classification also ensures that sensitive material is appropriately marked and protected throughout its life cycle.

8.2   The ICT Acceptable Use Policy guides employees on their responsibilities in terms of information security and the rules on use of email, internet and computer use on Council devices. This minimises the risk of data loss or corruption from malicious sites and software, and reduces the likelihood of sensitive data being distributed incorrectly.

8.3   Information Security training is compulsory for all staff members in order to ensure that each employee understands the risks of failure to adhere to information security policies, their responsibilities to ensure information security, and to contact the Information Security Officer if they are concerned about potential breaches.

8.4   Guidance is also given to staff regarding the correct and most effective ways to store records to minimise the risk of loss of records due to poor storage. The Records Management Guide to Staff is a comprehensive document advising on all aspects of records management, including the correct methods of storing electronic and paper records. The Records Transfer and Archive Policy instructs as to the safest method of transporting records

Evidence:

1.   Appendix 44: SAC E44 - Screenshot of South Ayrshire Council Intranet Information Security Mini-Site
2.   Appendix 45:   SAC E45 - Screenshot of South Ayrshire Council Intranet Information Governance Mini-Site
3.   Appendix 25(a): SAC E25(a) - South Ayrshire Council Information Security Policy 2012

4. Appendix 25(b): SAC E25(b) South Ayrshire Council Information Security Incident Management Procedure V1.8 2015
5. Appendix 20: SAC E 20 - South Ayrshire Council Information Classification Procedure 2014
6. Appendix 46: SAC E46 - South Ayrshire Council ICT Acceptable Use Policy
7. Appendix 47: SAC E47 - Screenshot of South Ayrshire Council Information Security E-Learning Module
8. Appendix 48: SAC E48 - South Ayrshire Council Records Management Guide to Staff 2017
9. Appendix 34: SAC E34 - South Ayrshire Council Records Transfer and Archives Policy
10. Appendix 14: SAC E14 - South Ayrshire Council Record Disposal Policy

Element 9: Data Protection

An authority that handles personal information about individuals has a number of legal obligations to protect that information under the Data Protection Act 1998.

10.1 The Council treats its obligations under the Data Protection Act 1998 very seriously and this Plan recognises the role robust records management practice has on the authority's ability to meet its obligations. In recognition of these obligations, the Council is registered with the Information Commissioner's Office.

10.2 As set out in the Council's Data Protection Policy, the Council fully endorses and adheres to the Principles of data protection, as set out in the Data Protection Act 1998. The Council's Data Protection Code of Practice sets out in more detail all aspects of data protection and the Council's responsibilities in meeting all data protection principles. The Council's intranet contains an Information Governance mini-site, accessible from the homepage, where the Council's Data Protection Policy and Data Protection Code of Practice are available for employees.

10.3   Data Protection training is also compulsory for all employees, ensuring that each employee is aware of their obligations under the Act and to contact the Council's Data Protection Officer in the event of a data protection breach. Many of the elements of this Plan have a direct impact on the Council's responsibilities regarding data protection, and measures such as the corporate records retention schedule and information security procedures, for example, ensure that personal and sensitive data is accurate, only held for as long as necessary and processed fairly and lawfully.

10.4 A Freedom of Information E-learning module is available for employees, which includes information and guidance on relevant legislation, advice on exemptions and costings, and the contact details for the FOI team. This module ensures that employees are aware of their responsibilities under the Freedom of Information (Scotland) Act 2002 and Environmental Information (Scotland) Regulations 2004 and what information the Council publishes in the public domain.   Using the current Records Management Guide to staff, available on the Council's internal intranet the Information Governance Team also plans to create a Records Management e-learning module to consolidate employee's knowledge gained from engagement with and implementation of the RMP.

10.5 The Council also recognises the importance of ensuring that the public understand how personal information is used and held by the Council. The Council external website sets out its privacy policy at http://www.south-ayrshire.gov.uk/terms/policy/, and includes the process for members of the public requesting a copy of their personal data held by the Council. The Council's Data Protection Policy is published on the external website, https://www.south-ayrshire.gov.uk/foi/personal-data.aspx again ensuring the public are informed of the measures taken by the Council to protect sensitive and personal information.

Evidence:

1. Appendix 49: SAC E49 - Certificate of South Ayrshire Council's Registration with the Information Commissioner's Office
2. Appendix 50: SAC E50 - South Ayrshire Council Data Protection Policy
3. Appendix 51: SAC E51 - South Ayrshire Council Data Protection Code of Practice
4. Appendix 52: SAC E52 - Screenshot of South Ayrshire Council Intranet Homepage promoting Information Security and Information Governance Mini-Sites
5. Appendix 44: SAC E44 - Screenshot of South Ayrshire Council Intranet Information Security Mini-Site
6. Appendix 53: SAC E53 - Screenshot of South Ayrshire Council Data Protection E-Learning Module
7. Appendix 54: SAC E54 - Screenshot of South Ayrshire Council Freedom of Information E-Learning Module
8. Appendix 48: SAC E48 - South Ayrshire Council Records Management Guide to Staff 2017
9. Appendix 55: SAC E 55 - South Ayrshire Council Privacy Policy Screenshot (External Web page)

Element 10: Business Continuity and Vital Records

A Business Continuity and Vital Records Plan serves as the main resource for the preparation for, response to, and recovery from, an emergency that might affect any number of crucial functions in an authority.

10.1 Due to the critical services carried out by South Ayrshire Council, it is essential that the authority can continue to function in the event of an interruption to normal business procedures. The Council's Corporate Business Continuity Plan aims to reduce the impact of a disruption to the Council by restoring critical functions as soon as possible, keeping disruption to a minimum. It is recognised that such a plan needs to be flexible so that it can cater for all types of business continuity incidents or situations. The Corporate Business Continuity Plan incorporates a Corporate Business Impact Analysis, which recognises the importance to the Council of records management.

10.2 The Council's Vital Records Policy sets out the process of identifying which records should be classed as vital, how vital records should be stored and protected, and the responsibilities of managers, staff and Records Management staff regarding vital records. This policy operates in conjunction with business continuity policies and procedures as it defines and protects what records are needed for the Council to continue its operation in the event of an emergency or major disruption to normal service.

10.3 The Ayrshire Archives Disaster Recovery plan has been developed to improve our ability to prepare for, respond to, and recover from, identified risks associated with disasters.

Evidence:

1.   Appendix 56: SAC E56 - South Ayrshire Council Corporate Business Continuity Plan
2.   Appendix 57: SAC E57 - South Ayrshire Council Vital Records Policy
3.   Appendix 11: SAC E11 - South Ayrshire Council Records Retention Schedule
4.   Appendix 58: SAC E58 - South Ayrshire Council Corporate Business Continuity Strategy
5.   Appendix 59: SAC E59 - South Ayrshire Council Civil Contingencies Response & Recovery Plan
6.   Appendix 60: SAC E60 - South Ayrshire Council High Level Scan – Risk & Safety, Business Continuity and Civil Contingencies
7.   Appendix 61: SAC E61 - Ayrshire Archives Disaster Recovery Plan

Element 11: Audit Trail

An audit trail is a sequence of steps documenting the movement and/or editing of a record resulting from activities by individuals, systems or other entities.

11.1   A key function of effective records management practice is the ability to monitor the life of a record in terms of edit and location history. The Council's procedures on transfer of records to the Corporate Records Management Centre ensures that at all times a record can be accounted for in terms of where it is, which member of staff has requested it be consigned or retrieved, when it is out of retention, and whether or not it has been destroyed. Records Management staff monitor requests for files from the Corporate Records Management Service, ensuring appropriate metadata is completed to clearly outline the current location of all records consigned to the service.

11.2   The Records and Data Officer is currently undertaking an audit of the records consigned to the Corporate Records Management Centre as part of a continuous audit process, ensuring that metadata held on these records is accurate and includes all relevant information, in particular information on retention and disposal.   Discussions within each Council service area regarding record retention scheduling and business classification have also emphasised to services the importance of maintaining an accurate and up to date audit trail of records, in order to facilitate correct retention and destruction arrangements.

11.3   The Council's Records Management Policy Framework states that Internal Audit will periodically scrutinise record keeping practices to ensure compliance with this framework policy and as part of risk management. It also provides that the Records and Data Officer will regularly audit Council records management practices for compliance with this policy framework. Services will be expected to audit their own records management practices regularly in light of existing and future legislation and Council requirements. The Council's Records Management Plan states that Internal Audit will include Information Management as an element in the Risk Register to be periodically scrutinised.

11.4   The implementation of the Council's business classification scheme will assist in developing a corporate file plan that will be introduced across Council services to use a single standard filing system for electronic records. Additionally, Records management staff are currently meeting with Senior Management to outline developments in this area.   Further, the aforementioned work currently being undertaken to introduce corporate naming conventions across the Council will also facilitate effective audit trail of records.

11.5   Within the scoping exercise for an EDRMS, one of the requirements for the system is that it must have the functionality for monitoring the audit trail of records, recognising that it is essential that we have the ability to track the changes on records and who has made these changes or accessed a document.   Having a consistent business classification feeding into the EDRMS would also assist in ensuring that documents are not accessed by users who do not have the correct editing or viewing permissions.

11.6   Many of the procedures and policies currently in place are crucial in maintaining an audit trail of records. Key documents such as the Records Management Policy Framework, Records Transfer and Archives Guidance, and Disposal Policy give clear guidance to ensure accurate audit trails, consolidated by procedures such as those relating to consignment, retrieval, classification and file naming. These policy and procedural provisions are especially critical to monitoring electronic records stored on shared drives, where it is more challenging to ensure commonality and accuracy in the audit trail of records.

11.7   The Records Management Policy Framework and the proposed Naming Conventions stipulate all employees are responsible for creating and maintaining authentic and reliable records by following guidance on naming conventions and storage of electronic records. The documents accessed by Council employees and submitted in evidence of this Plan assist employees to be able to carry out this responsibility.

The Council's Records Management Guide to Staff provides guidance and assistance in managing electronic records effectively. For example:

- It stipulates that staff should not create or store electronic records on a PC hard drive;
- It explains the risks associated with storing electronic records on a PC hard drive and confirms that such records are not backed up by ICT services;
- It explains that records stored on a PC hard drive cannot be accessed by other employees and are at risk of being lost; and
- It stipulates that metadata (i.e. the data about records) should be attached to electronic records when possible at the time of creation, which may include details of the author, context, and the document version.

The necessity of a clear audit trail is emphasised throughout by guiding staff to ensure a file tracking system is adopted within service areas therefore allowing hard copy records to be easily tracked and located. It recommends to Council staff that the record tracking system should be used when a record is removed from its filing structure and should detail the name of person removing file and the date.

Additionally with electronic records staff are guided to ensure such records are version controlled to provide an audit trail and also ensuring the current version of the electronic record is referred to. When members of the Information Governance Team meet with service areas to agree and implement the Council's Record Retention Schedule, employees are also reminded of the importance of following the procedures in place to manage the storage of both hard copy and electronic records.

Evidence:

1.   Appendix 4: SAC E04 - South Ayrshire Council Records Management Policy Framework

2.	Appendix 7: SAC E07 - South Ayrshire Council Business Classification Scheme

3.	Appendix 34: SAC E34 - South Ayrshire Council Records Transfer and Archives Policy

4.	Appendix 14: SAC E14 - South Ayrshire Council Record Disposal Policy

5.	Appendix 48: SAC E48 - South Ayrshire Council Records Management Guide to Staff

6.	Appendix 62: SAC E62 - South Ayrshire Council Example of Records Management Audit Forms

7.	Appendix 63: SAC E63 - South Ayrshire Council Example of Records Management Issues and Returns Spreadsheet

8.	Appendix 64: SAC E64 - South Ayrshire Council Records Management Issuing and Returning Records Guidance

9.	Appendix 65: SAC E65 - Screenshot of South Ayrshire Council Information Asset Register

10.	Appendix 29: SAC E29 - South Ayrshire Council Naming Conventions (Proposed)

Element 12: Competency Framework for Records Management Staff

A competency framework lists the core competencies and the key knowledge and skills required by a records manager. It can be used as a basis for developing job specifications, identifying training needs, and assessing performance.

12.1 The performance and skills of all South Ayrshire Council employees are measured against the four core competencies of:

- Achieving results through personal effectiveness;
- Working with others;
- Customer service excellence; and
- Communication

These are the competencies against which all Council staff are recruited and their progress measured at annual Performance and Development Reviews (PDRs).   For records management staff, duties in records management are related to these competencies to encourage high levels of performance and professionalism across all responsibilities.

E-learning is also a key way that Council employees can maintain their skills and knowledge, and there are modules for Data Protection and Information Security.   The Records Management Guide to Staff is readily available on the Council's intranet and provides advice on all aspects of records management, from records creation and management considerations, to archiving and disposal.

12.2 The Council recognises that records management is a separate function from general administrative tasks, and therefore the competencies and requirements of records management staff are heavily linked to records management-specific training and development. The Information Governance Team Leader has recently achieved a Postgraduate Diploma in Information and Records Management and the Records and Data Officer is currently undertaking a Postgraduate Diploma in Records Management and Digital Preservation. Additionally, the Co-ordinator (Registration, Records and Information) has a Postgraduate Diploma in Archives and Records Management with staff within the Information Governance team also members of Archives and Records Association (ARA), Archivists of Scottish Local Authorities Working Group (ASLAWG) and Information and Records Management Society (IRMS).

Evidence:

1.   Appendix 66: SAC E66 - South Ayrshire Council Competency Framework
2.   Appendix 3: SAC E03 - Job Description: Team Leader (Information Governance)
3.   Appendix 67:   SAC E67 - Job Description: Records and Data Officer

4. Appendix 68: SAC E68 - Performance and Development Review for Team Leader (Information Governance) 2017 – Redacted
5. Appendix 16: SAC E16 - Screenshot of South Ayrshire Council Data Protection E-Learning Module
6. Appendix 15:   SAC E15 - Screenshot of South Ayrshire Council Information Security E-Learning Module
7. Appendix 48: SAC E48 - South Ayrshire Council Records Management Guide to Staff
8. Appendix 69: SAC E69 – ASLAWG Meeting Invitation Email Screenshot 2017
9. Appendix 70: SAC E70 – SAC IRMS Membership Certificate (R. Queen)
10. Appendix 71: SAC E71 – Archives and Records Association Membership 2016-17 (D. McVey)

Element 13: Review and Assessment

Regular assessment and review of records management systems will give an authority a clear statement of the extent that its records management practices conform to the Records Management Plan as submitted and agreed by the Keeper.

13.1   To ensure The Council's compliance with the Public Records (Scotland) Act 2011 and to meet its obligations to its service users, the Council recognises that a robust self-assessment mechanism is instrumental to the success of the implementation of the RMP. The Council's RMP Review Plan sets out the scheduling of regular, formal assessments of the Plan, which will report on the adoption of each element of the scheme, develop or amend the documentation as required, report on progress against the improvement plan, and develop and amend the improvement plan. Review will be carried out on an annual basis following agreement of the Plan by the Keeper of the Records of Scotland.

13.2   The assessment will primarily be carried out by the Records and Data Officer, supported by the Information Governance Team Leader. This will ensure that the Plan will be assessed by staff members with records management skills, knowledge and qualifications, who were instrumental in the creation and implementation of the Plan itself. The assessment will be signed off by the Head of Legal and Democratic Services, and then reported to Elected Members, guaranteeing a high level of corporate scrutiny.

13.3   The Council's Records and Data Officer will pro-actively meet with Senior Managers within service areas to undertake audit assessment checks to ensure records management practice through-out the Council meets the Council's Records Management Plan and Policies. Records Management staff will provide Service Area Managers with a Records Management Compliance Self-Assessment Workbook, for completion prior to assessment, allowing identification of areas of record keeping practice that do not meet the requirements of the Records Management Plan and Council Policies, ensuring continuous improvement to meet legislation requirements. Additionally, the Council anticipates it will utilise the Archives and Records Management Service Quality Improvement Tool (ARMS) http://www.scottisharchives.org.uk/arms which is recognised as an effective management tool that will provide the necessary support to focus on key outcomes and performance indicators for the Council's Records Management service.

13.4   The Council's Internal Audit Service includes Information Management as an element in the audit universe and will also scrutinise record keeping practices during core system audit reviews to ensure compliance with the Council's Policy Framework and as part of Risk Management.

13.5   The Records and Data Officer will work with the Council's Information Governance Team Leader to meet with Information Governance Co-ordinators within Directorates to communicate progress through regular Information Governance Group meetings, and provide

update reports to the Head of Legal and Democratic services who is able to provide appropriate updates to the Council's Corporate Management Team.

13.6 This combination of short, medium and long term assessment allows checks to be made as to the expected operation of the Plan, to support compliance and good practice.

Evidence:

1. Appendix 72: SAC E72 - South Ayrshire Council Records Management Plan Assessment & Review Plan (V1.1), dated 21st August 2017.
2. Appendix 73: SAC E73 – South Ayrshire Council Information Governance Co-ordinators Group Meeting Agenda, dated 13th March 2017
3. Appendix 74: SAC E74 – South Ayrshire Council Records Management Compliance Self-Assessment Workbook (V1.0).
4. Appendix 75: SAC E75 – South Ayrshire Council Internal Audit Records Management Hazard Identification Document
5. Appendix 76 SAC E76 – South Ayrshire Council Internal Audit Information Security Audit Report (March 2017)

Element 14: Shared Information

Good information governance requires compliance with, and observation of, numerous legal obligations that exist in relation to the gathering, processing, storage, provision of access to and sharing of information, including personal data, sensitive personal data and information that can more broadly be considered to be "confidential".

14.1   Given the breadth and complexity of the functions it undertakes and services it delivers, the Council requires robust information sharing protocols to assist the delivery of services. In additional, the governance landscape for Scottish local authorities is changing, with an increasing emphasis on the opportunities for shared services. The Council has a number of shared services, including in relation to roads, tourism, and civil contingencies. The introduction of the Health and Social Care Partnership between the Council and NHS Ayrshire & Arran in April 2015 presents additional requirements in order to ensure information is shared when necessary to enable the redesign of services, but to ensure that it is always shared in a compliant way. Due to the personal, sensitive and confidential nature of many health and social care records, the utmost care must be taken by all staff to protect records; however an effective information sharing protocol is essential to ensure the best and most effective level of care is given to service users across integrated services. Comprehensive guidance is available to staff working within the Health and Social Care Partnership through the Information Sharing Framework Guidance Document.

14.2   Controlled information sharing within the Council is required for effective and efficient delivery of services. Information is readily available on the Council's intranet to advise staff members of their obligations in terms of data protection and the procedures as to when and how information can and should be shared:

- The Data Sharing Checklist is an important resource in assisting employees in ascertaining whether or not specific information can be shared and if it can, what the best method is to ensure the protection of the data;
- The Information Sharing Flowchart also provides guidance on how and when to share information, in an easy to understand, visual format;
- The Information Sharing Briefing Note also provides succinct information for staff on the considerations around sharing information;
- In addition, the Information Classification Procedure also protects restricted and confidential records being distributed without authorisation and due consideration to data protection principles;

14.3   In order to facilitate joined up working across teams within services, access to shared electronic folders is controlled through an active directory. This ensures that information can be easily accessed by staff who require this information for their day to day responsibilities, within the parameters of the various legal obligations that exist.

14.4 This Plan recognises that effective and monitored information sharing would improve with the introduction of an EDRMS, if a suitable solution can be sourced for corporate use, protecting sensitive data from unauthorised distribution or amendment. The Council commits to updating the Keeper on the sourcing exercise currently ongoing for an EDRMS and linked intranet solution.

Evidence:

1. Appendix 77: SAC E77 - Ayrshire and Arran Protocol for Sharing Information between East Ayrshire Council, North Ayrshire Council, South Ayrshire Council, NHS Ayrshire & Arran, Police Service of Scotland, Integration Joint Boards and Scotland Fire and Rescue Service.
2. Appendix 78: SAC E78 - Health & Social Care Partnership Information Sharing Framework Guidance Document
3. Appendix 79: SAC E79 - South Ayrshire Council Data Sharing Checklist
4. Appendix 80: SAC E80 - South Ayrshire Council Information Sharing Flowchart
5. Appendix 81: SAC E81 - South Ayrshire Council Information Sharing Briefing Note
6. Appendix 20: SAC E20 - South Ayrshire Council Information Classification Procedure 2014

Contracts

Section 3 of the Public Records (Scotland) Act 2011 defines:

(1) In this Act (PRSA) "public records" in relation to an authority, means -

(a) Records created by or on behalf of the authority in carrying out its functions;
(b) Records created by or on behalf of a contractor in carrying out the authority's functions;
(c) Records created by any other person that have come into the possession of the authority or a contractor carrying out the authority's functions.

(2) In subsection (1) "contractor", in relation to an authority, means a person to whom functions of the authority are delegated (whether under a contract or otherwise) by the authority.

C.1   The Council's standard contract Terms and Conditions (T&Cs) are currently being revised to incorporate that in so far as carrying out functions for the Council, a contractor will comply with the Public Records (Scotland) Act 2011 and will indemnify the Council in respect of any claims arising due to a contract's breach of the Act.

C.2   The Council intends to use the style wording developed by SOLAR for inclusion in contract conditions. This is available on the Scottish Council for Archives website Scottish Council on Archives Draft Contract Clauses

This Plan applies to all records created by the authority in carrying out its function and all records created by a contractor in carrying out the authority's functions.

Evidence:

1. Appendix 82: SAC E82 – Scottish Council on Archives Records Management Clauses for Contracts.

Appendix: Index of Items Submitted as Evidence

1. SAC E01: Letter of Responsibility from Eileen Howat, Chief Executive of South Ayrshire Council, dated 30th March 2017

2. SAC E02: Letter of Endorsement from Ralph Riddiough, Clerk to South Ayrshire Licensing Board and South Ayrshire Council's Head of Legal & Democratic Services, dated 20th March 2017

3. SAC E03: South Ayrshire Council Job Description Team Leader (Information Governance)

4. SAC E04: South Ayrshire Council Records Management Policy Framework

5. SAC E05: Extract of Minute of South Ayrshire Council Meeting approving Records Management Policy Framework, dated 12th May 2016.

6. SAC E06: South Ayrshire Council Records Management Intranet Area Screenshot

7. SAC E07: South Ayrshire Council Business Classification Scheme

8. SAC E08: South Ayrshire Council Electronic Records Management and EDRMS Presentation 2017

9. SAC E09: South Ayrshire Council Business Plan 2016-2018

10. SAC E10(a): South Ayrshire Council Transform South Ayrshire Report to Leadership Panel, dated 14th June 2016

    SAC E10(b): South Ayrshire Council Transform South Ayrshire Update Report to Service and Performance Panel, dated 21st March 2017

11. SAC E11: South Ayrshire Council Records Retention Schedule, dated March2017

12. SAC E12: Minutes of Full South Ayrshire Council Meeting approving adoption of SCARRS, dated 6th October 2016

13. SAC E13: South Ayrshire Council Records Retention Schedule Approval Form

14. SAC E14: South Ayrshire Council Record Disposal Policy

15. SAC E15: Screenshot of South Ayrshire Council Information Security E-Learning Module

16. SAC E16: Screenshot of South Ayrshire Council Data Protection E-Learning Module

17. SAC E17: South Ayrshire Council Example Disposal Register

18. SAC E18: South Ayrshire Council Corporate Records Management Service Destruction of Records Authorisation Form

19. SAC E19: South Ayrshire Council Corporate Records Management Service Destruction of Records Confirmation Form

20. SAC E20: South Ayrshire Council Information Classification Procedure 2014

21. SAC E21: South Ayrshire Council Confidential Waste Disposal Service ITT Tender Advertisement

22. SAC E22: PSS Contract Acceptance Letter Confidential Waste Disposal Contract

23. SAC E23: Paper Shredding Services Award of Contract

24. SAC E24: South Ayrshire Council Confidential Disposal of Records Procedure

25. SAC E25(a): South Ayrshire Council Information Security Policy 2012

    SAC E25 (b): South Ayrshire Council Information Security Incident Management Procedure 2015 (V1.8)

26. SAC E26: South Ayrshire Council Protocol of Disposal of Computer Equipment 2017

27. SAC E27: South Ayrshire Council Information Classification Policy (Proposed)

28. SAC E28: South Ayrshire Council Information Classification Guidelines (Proposed)

29. SAC E29: South Ayrshire Council Naming Conventions (Proposed)

30. SAC E30: South Ayrshire Council ICT Back-up Regime

31. SAC E31: SAC & CCL Hardware Disposal Service Level Agreement 2017

32. SAC E32: Minute of Agreement between East Ayrshire Council, North Ayrshire Council and South Ayrshire Council, appointing Joint Body of Ayrshire Archives

33. SAC E33: Ayrshire Archives Acquisition Policy

34. SAC E34: South Ayrshire Council Records Transfer and Archives Policy

35. SAC E35: South Ayrshire Council Records Management Guide to Completing Records Deposit Form and Records Transmittal List

36. SAC E36: South Ayrshire Council Records Management Example Transmittal List

37. SAC E37: South Ayrshire Council Records Management Example Records Deposit Form

38. SAC E38: South Ayrshire Council Records Management Frequently Asked Questions

39. SAC E39: South Ayrshire Council Records Management Records Disposal to Archives Authorisation Form

40. SAC E40: South Ayrshire Council Records Management Information Leaflet

41. SAC E41: South Ayrshire Council Records Management Example Triplicate Retrieval Form

42. SAC E42: Memorandum of Understanding between Ayrshire Valuation Joint Board (AVJB) and Ayrshire Archives, dated 14th and 17th March 2017

43. SAC E43: South Ayrshire Council Capital Investment Report, dated March 2017 (Ayrshire Archives upgrading)

44. SAC E44: Screenshot of South Ayrshire Council Intranet Homepage Information Security Mini-Site

45. SAC E45: Screenshot of South Ayrshire Council Intranet Information Governance Mini-Site

46. SAC E46: South Ayrshire Council ICT Acceptable Use Policy

47. SAC E47: Screenshot of South Ayrshire Council Information Security E-Learning Module

48. SAC E48: South Ayrshire Council Records Management Guide to Staff 2017

49. SAC E49(a): Certificate of South Ayrshire Council's Registration with the Information Commissioner's Office

50. SAC E50: South Ayrshire Council Data Protection Policy

51. SAC E51: South Ayrshire Council Data Protection Code of Practice

52. SAC E52: Screenshot of South Ayrshire Council Intranet Homepage promoting Information Security and Information Governance Mini-Sites

53. SAC E53: Screenshot of South Ayrshire Council Data Protection E-Learning Module

54. SAC E54: Screenshot of South Ayrshire Council Freedom of Information E-Learning Module

55. SAC E 55: South Ayrshire Council Privacy Policy Screenshot (External Web page)

56. SAC E56: South Ayrshire Council Corporate Business Continuity Plan

57. SAC E57: South Ayrshire Council Vital Records Policy

58. SAC E58: South Ayrshire Council Corporate Business Continuity Strategy

59. SAC E59: South Ayrshire Council Civil Contingencies Response & Recovery Plan

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66. SAC E66: South Ayrshire Council Competency Framework

67. SAC E67: Job Description: Records and Data Officer

68. SAC E68: Performance and Development Review for Team Leader (Information Governance)

69. SAC E69: ASLAWG Meeting Invitation Email Screenshot 2017

70. SAC E70: SAC IRMS Membership Certificate (R. Queen)

71. SAC E71: Archives and Records Association Membership 2016-17 (D. McVey)

72. SAC E72 - South Ayrshire Council Records Management Plan Assessment & Review Plan (V1.1), dated 21st August 2017

73. SAC E73 – South Ayrshire Council Information Governance Co-ordinators Group Meeting Agenda, dated 13th March 2017

74. SAC E74 – South Ayrshire Council Records Management Compliance Self-Assessment Workbook (V1.0).

75. SAC E75 – South Ayrshire Council Internal Audit Records Management Hazard Identification Document

76. SAC E76 – South Ayrshire Council Internal Audit Information Security Audit Report (March 2017)

77. SAC E77 - Ayrshire and Arran Protocol for Sharing Information between East Ayrshire Council, North Ayrshire Council, South Ayrshire Council, NHS Ayrshire & Arran, Police Service of Scotland, Integration Joint Boards and Scotland Fire and Rescue Service.

78. SAC E78 - Health & Social Care Partnership Information Sharing Framework Guidance Document

79. SAC E79 - South Ayrshire Council Data Sharing Checklist

80. SAC E80 - South Ayrshire Council Information Sharing Flowchart

81. SAC E81 - South Ayrshire Council Information Sharing Briefing Note

82. SAC E82 – Scottish Council on Archives – Records Management Clauses for Contractors