



**SCOTTISH**  
**FIRE AND RESCUE SERVICE**

Working together for a safer Scotland

# STRATEGIC PLANNING, PERFORMANCE AND COMMUNICATIONS

## INFORMATION GOVERNANCE

### RECORDS MANAGEMENT PLAN

Author/Role	Morag Allan, Records Management Officer
Date of Risk Assessment (if applicable)	N/A
Date of Equality Impact Assessment	13 December 2017
Date of Impact Assessment (commenced)	N/A
Date of Impact Assessment (concluded)	N/A
Quality Control (name)	Carol Wade, Information Governance Manager
Authorised (name and date)	Mark McAteer, Director of Strategic Planning, Performance and Communications – 27 April 2017
Last reviewed/amended (name and date)	Morag Allan – 3 May 2018
Date for Next Review	08 December 2018 and annually thereafter

**VERSION HISTORY**

<b>Version</b>	<b>Action/Change</b>	<b>Made by</b>	<b>Date</b>
1.0	Sent to National Records of Scotland for agreement	Morag Allan, Records Management Officer	27/04/2017
2.0	Statements and evidence reviewed and, where required, updated before assessment	Morag Allan, Records Management Officer	28/07/2017
3.0	Statements and evidence amended, where required, following NRS interim report; sent to NRS for agreement	Morag Allan, Records Management Officer	09/11/2017
4.0	Agreed by NRS – details added	Morag Allan, Records Management Officer	08/12/2017
5.0	Approved by SFRS Strategic Leadership Team, issued to staff – details added; links added to Element 2, 2 <sup>nd</sup> paragraph; Appendix A evidence list updated	Morag Allan, Records Management Officer	03/05/2018



**SCOTTISH**  
**FIRE AND RESCUE SERVICE**  
Working together for a safer Scotland

# **STRATEGIC PLANNING, PERFORMANCE AND COMMUNICATIONS**

## **INFORMATION GOVERNANCE**

### **RECORDS MANAGEMENT PLAN**

#### **VERSION HISTORY**

#### **INTRODUCTION**

#### **ELEMENT 1 – SENIOR MANAGEMENT RESPONSIBILITY**

#### **ELEMENT 2 – RECORDS MANAGER RESPONSIBILITY**

#### **ELEMENT 3 – RECORDS MANAGEMENT POLICY STATEMENT**

#### **ELEMENT 4 – BUSINESS CLASSIFICATION**

#### **ELEMENT 5 – RETENTION SCHEDULES**

#### **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 RM STAFF**

**ELEMENT 13 – ASSESSMENT AND REVIEW**

**ELEMENT 14 – SHARED INFORMATION**

**APPENDIX A – EVIDENCE SUBMITTED**

**APPENDIX B – ACTIONS**

## INTRODUCTION

### **Public Records (Scotland) Act 2011**

The Public Records (Scotland) Act 2011 (the Act) came into force on 1 January 2013. Its primary aim is to promote efficient and accountable records management by named Scottish public authorities. The Act requires authorities to prepare a Records Management Plan, setting out proper arrangements for the management of their records, submit their Plans to the Keeper of the Records of Scotland (the Keeper) for agreement, ensure their records are managed in accordance with the agreed Plan and ensure the Plan is regularly reviewed.

A copy of the Act can be found on the Legislation.gov.uk website:

<http://www.legislation.gov.uk/asp/2011/12/contents>

Further information on the Act can be found on the National Records of Scotland website:

<https://www.nrscotland.gov.uk/record-keeping/public-records-scotland-act-2011>

### **SFRS Records Management Plan**

Under the terms of the Act, the Scottish Fire and Rescue Service (SFRS) has prepared this Records Management Plan (the Plan). The Plan sets out the overarching framework for the development and implementation of robust records management arrangements within SFRS. The Plan is based on the 14 elements of the Model Records Management Plan and Guidance provided by the National Records of Scotland. SFRS has provided statements under each element, evidence of current arrangements and actions for future improvements.

The Keeper agreed the Plan on 8 December 2017 and it was approved by the SFRS Strategic Leadership Team on 15 January 2018 to be adopted and implemented throughout SFRS. It has been published on the SFRS Intranet for reference and use by

staff, as well as on the SFRS website for information for the public, in the spirit of openness, transparency and accountability to all of our stakeholders.

As well as meeting the requirements of the Act, the Plan supports the SFRS Strategic Outcome, 'We are a high quality, continuously improving, efficient public service' ([SFRS Strategic Plan 2016-19, page 4](#)).

## **Records Management**

Records management is the systematic control of an organisation's records, throughout their lifecycle, in order to meet operational business needs, statutory and fiscal requirements and community expectations. Effective management of records allows fast, accurate and reliable access to records, ensuring the timely destruction of redundant information and the identification and protection of vital and historically important records.

Records are a vital corporate asset, supporting decision-making processes, policy creation and service delivery. Therefore, they must be managed effectively during their lifecycle, from creation, through maintenance and use, to disposal by permanent destruction or permanent archiving.

The systematic management of records will allow SFRS to:

- Know which records SFRS holds and locate them easily
- Increase efficiency and effectiveness
- Make savings in terms of staff time and storage space
- Support decision-making
- Be accountable
- Achieve business objectives and targets
- Provide continuity in the event of a disaster
- Provide a 'corporate memory'

- Meet legislative and regulatory requirements, particularly as laid down by the Freedom of Information (Scotland) Act 2002 and the Data Protection Act 1998
- Protect the interests of employees, clients and stakeholders

SFRS will manage its records in a manner which ensures that they remain accessible, accurate, authentic, complete, comprehensive, compliant, effective and secure. This will be achieved through the development and implementation of effective records management arrangements, as laid out in this Plan.

### **Scottish Fire and Rescue Service**

SFRS was established as a single national organisation by the Police and Fire Reform (Scotland) Act 2012 to provide fire and rescue services across Scotland. As a result of the Act, the eight legacy Fire and Rescue Services (Central Scotland, Dumfries & Galloway, Fife, Grampian, Highlands & Islands, Lothian & Borders, Strathclyde and Tayside) and the Scottish Fire Services College were merged to form the Scottish Fire and Rescue Service on 1 April 2013.

The main purpose of SFRS is ‘to work in partnership with communities and with others in the public, private and third sectors on prevention, protection and response, to improve the safety and well-being of people throughout Scotland’. ([SFRS Strategic Plan 2016-19, page 6](#)).

SFRS’ activities are organised into 5 Directorates – Response & Resilience, Prevention & Protection, Finance & Contractual Services, People & Organisational Development and Strategic Planning, Performance & Communications. The National Headquarters are in Cambuslang, with 3 Service Delivery Area Headquarters in Dyce (North), Newbridge (East) and Hamilton (West). The Service Delivery Areas are divided into 17 Local Senior Officer areas between them. SFRS has approximately 8000 members of staff.

As SFRS is a relatively new organisation, the requirements of the Public Records (Scotland) Act 2011 are timely, as the Plan will act as a framework for ensuring that SFRS replaces legacy systems and processes with robust records management arrangements.

### **Commitment**

I can confirm that I have overall strategic responsibility for records management within SFRS and that I approve the contents of this Plan. The Plan provides a starting point on which SFRS will build, acknowledging that there are currently gaps in our provision and areas for improvement. SFRS is committed to closing these gaps and has identified the actions to be taken to achieve this. The Plan will undergo continuous assessment and review and, as the specified actions are taken and further evidence produced (including finalised versions of draft documents), SFRS will provide the Keeper with updates, so that our Plan and the arrangements it describes remain compliant with the Act and fit for purpose.



Mark McAteer

Director of Strategic Planning, Performance and Communications

<b>ELEMENT 1 - SENIOR MANAGEMENT RESPONSIBILITY</b>
<b>Requirement</b>
<p>Identify the individual at senior level who has overall strategic responsibility for records management.</p> <p>Section 1(2)(a)(i) of the Act specifically requires a RMP to identify the individual responsible for the management of the authority’s public records.</p> <p>An authority’s RMP <b>must</b> name and provide the job title of the senior manager who accepts overall responsibility for the RMP that has been submitted.</p>
<b>Statement</b>
<p>The senior manager who has overall responsibility for records management within SFRS is Mark McAteer, Director of Strategic Planning, Performance and Communications. Mark McAteer is a member of the SFRS Strategic Leadership Team (SLT) and is the Senior Information Risk Owner (SIRO) for the Service.</p> <p>The SFRS Records Management Policy states that the Director of Strategic Planning, Performance and Communications has overall senior responsibility for records management. It also states that the Plan must have the approval and support of the SLT and the Director will accept overall responsibility for the submitted Plan.</p> <p>The Records Management Plan was submitted to the SLT and approved on 15 January 2018 to be adopted and implemented throughout SFRS. It has been uploaded to the SFRS Intranet for staff reference and its issue announced to all staff. It has also been uploaded to the SFRS website for public reference.</p>

<b>Evidence</b>	
E001	Commitment by Mark McAteer, Director of SPPC (Introduction to RMP)
E002	Organisational Structure (part)
E003	Records Management Policy
E004	SLT covering report for approval of Records Management Plan, 15/01/2018
E005	SLT minutes showing approval of Records Management Plan, 15/01/2018
E157	Intranet screenshot – News Item re Issue of Records Management Plan, 03/05/2018
E158	Intranet screenshot – Records Management Plan available to staff
E162	SFRS website – Records Management Plan available to public
<b>Actions</b>	
A1.1	This element will be reviewed whenever there are any changes to relevant personnel or organisational structure
<b>Guidance</b>	
<a href="https://www.nrscotland.gov.uk/record-keeping/public-records-scotland-act-2011/resources/model-records-management-plan/model-plan-guidance-to-element-1">https://www.nrscotland.gov.uk/record-keeping/public-records-scotland-act-2011/resources/model-records-management-plan/model-plan-guidance-to-element-1</a>	

<b>ELEMENT 2 - RECORDS MANAGER RESPONSIBILITY</b>
<p data-bbox="181 247 381 283"><b>Requirement</b></p> <p data-bbox="181 359 1385 449">Identify the individual within the authority, answerable to senior management, to have day-to-day operational responsibility for records management within the authority.</p> <p data-bbox="181 525 1305 615">Section 1(2)(a)(ii) of the Act specifically requires a RMP to identify the individual responsible for ensuring the authority complies with its plan.</p> <p data-bbox="181 690 1433 781">An authority's RMP <b>must</b> name and provide the job title of the person responsible for the day-to-day operation of activities described in the elements in the authority's RMP.</p>
<p data-bbox="181 856 337 892"><b>Statement</b></p> <p data-bbox="181 968 1430 1274">The Records Management Policy states that the Records Management Officer has day-to-day operational responsibility for records management, for implementing the Plan and for ensuring compliance with this Policy and the Plan. The Policy also states that the Records Management Officer will be responsible for ensuring that relevant procedures, systems and practices are in place, for providing appropriate guidance and training to staff and for reviewing the policy on a two-yearly basis, or as required.</p> <p data-bbox="181 1350 1414 1877">Morag Allan is the Records Management Officer. She is the author of the Records Management Plan, Records Management Policy (see <a href="#">Element 3</a>), Interim Records Retention Schedule and Feedback Form (see <a href="#">Element 5</a>), Records Disposal Form (see <a href="#">Element 6</a> and <a href="#">Element 7</a>) and File Naming Conventions Guidance (see <a href="#">Element 11</a>). She is the author of the report to the Strategic Leadership Team on the Records Management Plan (see <a href="#">Element 1</a>). Along with the Information Governance Manager, she is the author of the reports to the Senior Management Team on the Records Retention Schedule (see <a href="#">Element 5</a>) and File Naming Conventions Guidance (see <a href="#">Element 11</a>). She will also be the author of the Records Destruction Procedures (see <a href="#">Element 6</a>), Records Transfer Procedures (see <a href="#">Element 7</a>) and any other records</p>

management related documentation produced by SFRS. She will be responsible for the review of all of these documents.

The Records Management Officer's tasks are laid out in her annual action plan, which shows her responsibility for these tasks and the SFRS commitment to the development and implementation of records management arrangements within the Service.

The Records Management Officer is part of the Information Governance department, led by the Information Governance Manager, who is line managed by the Head of Strategic Planning and Performance, who is line managed by the Director of Strategic Planning, Performance & Communications (see [Element 1](#)).

The Information Governance department also includes the two Freedom of Information/Data Protection Officers, the FOI/DP Admin Support Assistant, the Information Security Officer and the Complaints Support Officer. The department exists to ensure that appropriate measures are implemented within SFRS to collect information, communicate it within and outside the organisation and process it, in a secure manner and in compliance with legislation. The department is committed to promoting and actively developing a culture of openness, transparency and accountability embodied in Access to Information legislation.

Information about the make-up and remit of the department is provided to staff on the SFRS Intranet, along with contact details for the department members and general information about Legislative/Statutory Compliance (Data Protection, Freedom of Information, Environmental Information Regulations), Information Security, Records Management and Compliments & Complaints.

The fact that SFRS has a department dedicated to Information Governance, including Records Management, Data Protection and Information Security, shows the Service's commitment to the relevant issues and legislation and the importance it places on good information governance in providing its services and in managing its business. The fact

that the members of staff responsible for records management, freedom of information, data protection and information security are part of the same department facilitates any collaboration in these areas, not only for the elements of the Plan but also for information governance issues within SFRS in general.

Information Governance staff meet for departmental meetings several times a year (due to geographical spread), when the agenda allows department members to update the others on their current tasks and issues and for the manager to discuss any other relevant current issues within the Service affecting the department. The Manager keeps in regular contact with the department members on an individual basis, either by email, phone or one-to-one meetings.

**Evidence**

E002	Organisational structure (part)
E003	Records Management Policy
E006	Records Management Action Plan
E007	Intranet screenshot – Information Governance information available to staff
E008	Intranet screenshot – Records Management information available to staff
E009	Information Governance department meeting agenda, 22/11/2016

**Actions**

A2.1	This element will be reviewed whenever there are any changes to relevant personnel or organisational structure
------	--

**Guidance**

<https://www.nrscotland.gov.uk/record-keeping/public-records-scotland-act-2011/resources/model-records-management-plan/model-plan-guidance-to-element-2>

**ELEMENT 3 - RECORDS MANAGEMENT POLICY STATEMENT**

**Requirement**

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.

The Keeper expects each authority's plan to include a records management policy statement.

**Statement**

A Records Management Policy has been issued by the SFRS. It was written by the Records Management Officer and was agreed by the Strategic Leadership Team on 19 November 2014 to go out for internal consultation, approved by the Director of Strategic Planning, Performance and Communications on 26 February 2015 and issued to staff on 2 March 2015.

The Policy is reviewed every 2 years by the Records Management Officer or sooner, if required, for example due to changes in legislation. It was last reviewed on 3 February 2017 and is next due for review on 3 February 2019. It is available on the SFRS Intranet and also on the SFRS public website.

Specific procedures, providing practical guidance on different aspects of records management, will be produced to accompany the Policy.

The Records Management Officer's annual action plan includes the action to review the Records Management Policy.

<b>Evidence</b>	
E003	Records Management Policy
E010	SLT covering report for approval of Records Management Policy, 19/11/2014
E011	SLT minutes showing approval of Records Management Policy, 19/11/2014
E012	Intranet screenshot – News Item re Issue of Records Management Policy, 03/03/2015
E013	Intranet screenshot – Records Management Policy available to staff
E014	SFRS website – Records Management Policy available to public
E006	Records Management Action Plan
<b>Actions</b>	
A3.1	The Records Management Policy will be reviewed every 2 years or as required
A3.2	This element will be reviewed whenever there are any changes to relevant evidence
<b>Guidance</b>	
<a href="https://www.nrscotland.gov.uk/record-keeping/public-records-scotland-act-2011/resources/model-records-management-plan/model-plan-guidance-to-element-3">https://www.nrscotland.gov.uk/record-keeping/public-records-scotland-act-2011/resources/model-records-management-plan/model-plan-guidance-to-element-3</a>	

<b>ELEMENT 4 - BUSINESS CLASSIFICATION</b>
<p><b>Requirement</b></p> <p>A business classification scheme describes what business activities the authority undertakes – whether alone or in partnership.</p> <p>The Keeper expects an authority to have properly considered business classification mechanisms and its RMP should therefore reflect the functions of the authority by means of a business classification scheme or similar.</p>
<p><b>Statement</b></p> <p>The Records Management Policy states that one of the ways in which SFRS will develop and implement effective records management is the introduction of a business classification scheme to reflect the functions, activities and transactions of SFRS, which will enable the efficient storage, retrieval and disposal of records.</p> <p>An explanation of what is meant by ‘business classification scheme’ is provided in the Policy, i.e. ‘a structure or ‘file plan’ which categorises an organisation’s functions, activities and transactions to aid in the retrieval, storage and disposal of records’.</p> <p>The Policy lists as an associated document the File Classification Scheme, thus reinforcing to staff the importance of a File Classification Scheme in good records management practice.</p> <p><b>Business Classification Scheme – legacy services:</b></p> <p>Prior to 1 April 2013, there were eight fire and rescue services in Scotland (see <a href="#">Introduction</a>). Members of staff within the eight services who were responsible for information management related tasks formed the Information Management Group of CFOA(S) - the Chief Fire Officers Association (Scotland). They met several times a year</p>

to discuss common issues, raise common queries, work on common templates (e.g. information sharing templates, publication scheme), etc. One of the items which the group started to work on was a common file classification scheme applicable to Scottish fire and rescue services. A draft scheme was compiled, using in part the Local Government Classification Scheme and the Integrated Public Sector Vocabulary, with additions for the primary functions of a fire and rescue service. Although work was done on the scheme around 2006-2008, it was never finalised or implemented in any of the services.

### **Business Classification Scheme – reform work:**

As part of the reform work prior to the start of the one national service on 1 April 2013, the classification scheme was resurrected, some terms were deleted and some added to bring it up-to-date. The scheme was then issued to each of the eight legacy services. The intention was for each service to implement the scheme in a folder structure on each legacy intranet, to enable the later merger of information from the eight legacy intranets into one national intranet, using the same structure. However, due to conflicting priorities, this did not fully materialise. Legacy electronic systems, e.g. shared drives and intranets, continue to exist, although staff are discouraged from adding new material to them and there is an ongoing project to decommission each of these sites. Departments across Scotland now have Office 365 'shared sites', where they can upload and share information with other department members, regardless of their locations. The scheme has not been imposed on these shared sites at this stage.

### **Electronic Records Management System:**

The Records Management Policy states that SFRS will also introduce an electronic records management system (ERMS), which will act as the main repository for SFRS records, except where the records are created, stored and used in other electronic 'line of business' systems or required in another format, e.g. paper.

An explanation of what is meant by 'electronic records management system' is provided in the Policy, i.e. 'an automated system used to manage the creation, use, maintenance and disposal of electronic records; it should be used to manage records within classification schemes, apply retention schedules and control access and use; it should also be able to maintain a record along with its associated metadata'.

In March 2014, members of the Information Governance, Corporate Communications and ICT departments met to discuss the implementation of an overall electronic records management solution for SFRS, e.g. SharePoint, to replace the existing legacy intranets and shared drives, which would include the migration of legacy information into a centralised location. However, there have been no further meetings on this topic. This is mainly due to other priorities and workloads set for the ICT department. The ICT Workstream 16 17 document from the Digital Steering Group included the 'Records Management' project, to review the 'requirements for corporate records management solution', with the status of 'Pipeline 17/18' and target end date of March 2018; however, in the Priority Workplan 2017/18 document, 'Records Management' is a 'low' priority, stating 'potentially shift to 18/19'.

Until such time as there is one main ERMS, records will continue to be stored in legacy intranets, legacy shared drives and will continually be transferred to new department shared sites.

**User Intelligence Group:**

A User Intelligence Group (UIG), set up by the Procurement department, met regularly between September 2016 and April 2017 to look into SFRS requirements for external records storage, records destruction and electronic records management solutions. The UIG members included both the Records Management Officer and the Information Governance Manager, who will ensure that all records management issues, including the application of the classification scheme, are taken into consideration during the

procurement of an ERMS. Any contracts set up will be to provide records management solutions only, not to contract out any functions of SFRS.

**Business Classification Scheme – review and development:**

The classification scheme will be reviewed and developed, prior to implementation within an SFRS-wide electronic records management system. Other existing schemes will be consulted and, where relevant to SFRS, the same headings will be used.

SFRS will consider the implementation of the scheme before an ERMS is implemented, to improve the management of electronic records, particularly in shared storage areas. The prior implementation of the scheme might facilitate the transfer of records from shared storage areas into an ERMS in the future.

SFRS will investigate the possibility of using the scheme to organise records held in paper format and also to organise records held in line of business systems, although the latter may not be possible, depending on how the systems are set up., e.g. IRS, the incident recording system is a UK-wide system for inputting details and gathering statistics for incidents attended by fire and rescue services. The Records Management Officer will develop processes to ensure that staff apply the scheme whenever possible.

**Records Retention Schedule:**

The development of the classification scheme will be tied into the development of the records retention schedule. Currently, the schedule is divided into sections based on the five directorates of SFRS. As explained further in [Element 5](#), this is an interim measure so that staff can easily identify the records their department holds. It is intended, in the long term, to re-arrange the schedule to reflect the functions, activities and transactions of SFRS to be more robust against any future organisational changes (and also to match the headings of the classification scheme).

It is intended that an information audit will be carried out to further populate the retention schedule with relevant information, e.g. which records contain personal data, confidential/sensitive/protectively marked information or vital records, so that these records can be more easily identified, in order to receive the extra storage and security considerations required (see [Element 6](#), [Element 8](#), [Element 9](#) and [Element 10](#)). The information audit will also assist in identifying the functions, activities and transactions to use in the retention schedule and the classification scheme.

Once the classification scheme is in use within an ERMS, the retention schedule having the same arrangement as the scheme will be a better tool for staff to use, as it will be easier to match up records within the scheme with the records within the schedule. Ideally, the retention schedule will be combined with the classification scheme, to create one tool for staff to use as one central point of reference.

The Records Management Officer's annual action plan includes the 'milestone' to develop a file classification scheme to reflect the functions of the Service.

**Evidence**

E003	Records Management Policy
E015	CFOAS Information Management Forum minutes, 03/02/2005
E016	CFOAS Information Management Forum minutes, 02/06/2011
E017	Draft File Classification Scheme and guidance 19/03/2013
E018	File Classification Scheme covering letter to legacy services, 19/03/2013
E134	SharePoint meeting agenda, 26/03/2014
E019	ICT Workstream 16-17 - DSG update, 01/08/2016
E020	ICT Priority Workplan 2017-18, 10/03/2017
E021	User Intelligence Group agenda, 20/09/2016
E022	User Intelligence Group minutes, 14/10/2016
E023	User Intelligence Group minutes, 15/11/2016
E024	User Intelligence Group minutes, 14/12/2016
E025	User Intelligence Group minutes, 07/02/2017

E026	User Intelligence Group minutes, 07/04/2017
E027	Interim Records Retention Schedule
E006	Records Management Action Plan
<b>Actions</b>	
A4.1	A SFRS business classification scheme will be developed and implemented to reflect the functions, activities and transactions of the Service
A4.2	This element will be reviewed whenever there are any changes to the actions required or the relevant evidence
<b>Guidance</b>	
<a href="https://www.nrscotland.gov.uk/record-keeping/public-records-scotland-act-2011/resources/model-records-management-plan/model-plan-guidance-to-element-4">https://www.nrscotland.gov.uk/record-keeping/public-records-scotland-act-2011/resources/model-records-management-plan/model-plan-guidance-to-element-4</a>	

<b>ELEMENT 5 - RETENTION SCHEDULES</b>
<p data-bbox="180 243 380 281"><b>Requirement</b></p> <p data-bbox="180 359 1382 447">A retention schedule is a list of records for which pre-determined disposal dates have been established.</p> <p data-bbox="180 522 1398 611">Section 1(2)(b)(iii) of the Act specifically requires a RMP to include provision about the archiving and destruction, or other disposal, of the authority’s public records.</p> <p data-bbox="180 686 1360 774">An authority’s RMP <b>must</b> demonstrate the existence of and adherence to corporate records retention procedures.</p>
<p data-bbox="180 848 337 886"><b>Statement</b></p> <p data-bbox="180 961 1414 1163">The SFRS Records Management Policy states that one of the ways in which SFRS will develop and implement effective records management is the introduction of a records retention schedule which will provide guidance as to how long to keep different types of records and how to dispose of them.</p> <p data-bbox="180 1239 1430 1381">An explanation of what is meant by ‘retention schedule’ is provided in the Policy, i.e. ‘a document showing how the records of an organisation will be treated over time, e.g. how long they should be retained and how they should be disposed of’.</p> <p data-bbox="180 1457 1360 1600">The Policy lists as an associated document the Records Retention Schedule, thus reinforcing to staff the importance of a Records Retention Schedule in good records management practice.</p> <p data-bbox="180 1675 1446 1818">SFRS is in the process of developing a full records retention schedule. The schedule will ensure that all records are routinely assigned retention periods and disposal actions. The schedule will be applied to records in all formats.</p>

An explanation of what is meant by 'disposal' is provided in the Policy, i.e. 'the decision as to whether a record should be destroyed or transferred to an archive for permanent preservation and the putting into effect of that decision'.

**Interim Records Retention Schedule:**

An interim schedule has been compiled, based on three fire service related schedules and the types of records, retention periods, legislation, etc. listed in them. The interim schedule gives some of the key records held by SFRS and provides staff with guidance on retention and disposal, as well as acting as a starting point for a full SFRS records retention schedule.

The interim schedule was issued in early 2016 to key stakeholders within SFRS for a 28 day consultation period for their comments on the layout, clarity, usefulness, etc. of the schedule and associated forms – records disposal form and schedule feedback form.

Although there has been some delay, the interim schedule and accompanying report were presented to the Senior Management Team (SMT, which sits below the Strategic Leadership Team and includes the Head of Strategic Planning and Performance in its members) on 22 March 2017 and approved.

The schedule has been uploaded to the SFRS Intranet for staff reference and its issue announced to all staff. Staff are asked to inform the Records Management Officer of any changes, additions or deletions required, using the feedback form. Each department should co-ordinate their responses, by ensuring full consultation with all relevant colleagues, with a manager returning their response; this will be taken as authorisation for the changes to be made. An example of a completed feedback form is provided.

### **Full Records Retention Schedule:**

This feedback will be used to build up a full records retention schedule for SFRS.

Feedback from staff will ensure that the schedule accurately reflects the range of records held by SFRS. Staff in each department are asked to provide any relevant information regarding statutory/regulatory requirements, codes of practice, industry/professional best practice or business needs for the retention periods. Such feedback is sought not only when the interim schedule has first been issued to staff but also at any time when departmental staff become aware of any changes to records held, relevant legislation, etc.

It is intended that, in the longer term, an information audit will be carried out to further populate the schedule with relevant information, e.g. which records contain personal data, confidential/sensitive/protectively marked information or vital records, so that these records can be more easily identified in order to receive the extra storage and security considerations required (see [Element 6](#), [Element 8](#), [Element 9](#) and [Element 10](#)). The schedule will also list which records should be made available on the SFRS website and which should be listed in the SFRS Publication Scheme.

The schedule is divided into eight sections – Version History; Guidance, Definitions and Associated Documents; a section for each of the 5 Directorates plus a section for Service Delivery. The Guidance explains the function of the schedule and how to use it, including definitions of keywords used and links to the Records Disposal Form, the Feedback Form and the Records Management Policy. This arrangement is an interim measure so that staff can easily identify the records their department holds. However, it is recognised that organisational structures can change and, therefore, it is intended, in the long term, to re-arrange the schedule to reflect the functions, activities and transactions of SFRS to be more robust against any future organisational changes.

Some staff have already had the opportunity to use the schedule as a tool during the Strategic Intent project, i.e. the rationalisation of the SFRS property portfolio. The

schedule has been issued to staff having to move location to assist them in 'clearing out' paper records, to provide guidance as to what can be destroyed and what should be kept.

**File Classification Scheme:**

Once the File Classification Scheme is in use within an ERMS (see [Element 4](#)), the retention schedule having the same arrangement as the scheme will be a better tool for staff to use, as it will be easier to match up records within the scheme with the records within the schedule. Ideally, the retention schedule will be combined with the business classification scheme, to create one tool for staff to use as one central point of reference.

The Records Management Officer and Information Governance Manager will ensure that all records management issues, including the application of the retention schedule, are taken into consideration during the development and implementation of an ERMS. This will include how to apply retention periods and disposal actions to records held within the ERMS.

The Records Management Officer will also develop processes to ensure that staff regularly apply the retention periods and disposal actions to paper records and electronic records held in systems outwith the main ERMS.

The Records Management Officer's annual action plan includes the 'milestone' to develop a full retention schedule for SFRS.

**Evidence**

E003	Records Management Policy
E027	Interim Records Retention Schedule
E028	Records Retention Schedule Feedback Form
E029	Records Disposal Form (draft)
E030	SMT covering report for approval of Records Retention Schedule for consultation, 23/11/2015

E031	SMT minutes showing approval of Records Retention Schedule for consultation, 23/11/2015
E032	Email issuing Records Retention Schedule for consultation, 16/02/2016
E033	SMT covering report for approval to issue Records Retention Schedule, 22/03/2017
E034	SMT minutes showing approval to issue Records Retention Schedule and approval to issue File Naming Conventions Guidance for consultation, 22/03/2017
E035	Intranet screenshot – News Item re Issue of Records Retention Schedule, 13/04/2017
E036	Intranet screenshot – Records Retention Schedule available to staff
E037	Intranet screenshot – Records Retention Schedule Feedback Form available to staff
E135	Example completed Records Retention Schedule Feedback Form
E038	Email issuing Records Retention Schedule to staff for Strategic Intent project (East Decommissioning), 17/02/2016
E039	Email issuing Records Retention Schedule to staff for Strategic Intent project (North Decommissioning), 08/07/2016
E017	Draft File Classification Scheme and Guidance, 19/03/2013
E006	Records Management Action Plan
<b>Actions</b>	
A5.1	The full SFRS Records Retention Schedule will be developed following feedback on the interim schedule
A5.2	This element will be reviewed following any development in the actions above or whenever any of the relevant evidence is reviewed
<b>Guidance</b>	
<a href="https://www.nrscotland.gov.uk/record-keeping/public-records-scotland-act-2011/resources/model-records-management-plan/model-plan-guidance-to-element-5">https://www.nrscotland.gov.uk/record-keeping/public-records-scotland-act-2011/resources/model-records-management-plan/model-plan-guidance-to-element-5</a>	

**ELEMENT 6 - DESTRUCTION ARRANGEMENTS**

**Requirement**

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.

Section 1(2)(b)(iii) of the Act specifically requires a RMP to include provision about the archiving and destruction, or other disposal, of an authority's public records.

An authority's RMP **must** demonstrate that proper destruction arrangements are in place.

**Statement**

The SFRS Records Management Policy states that one of the ways in which SFRS will develop and implement effective records management is the establishment of record destruction arrangements, such as guidance to staff and contracts with external contractors.

An explanation of what is meant by 'destruction' is provided in the Policy, i.e. 'the disposal of records by permanently destroying them and recording that such action has been taken'.

The Policy lists as an associated document the Records Destruction Arrangements (to be created once SFRS-wide arrangements are in place), thus reinforcing to staff the importance of destruction arrangements in good records management practice.

It is important that SFRS has in place proper arrangements for the secure destruction of records in all formats. These arrangements will ensure that SFRS holds records for no longer than is required, that records are destroyed appropriately and that destruction complies with all relevant legislation. Once a record reaches the end of the retention

period stipulated in the SFRS Records Retention Schedule, unless it is to be permanently archived, it will be destroyed appropriately.

### **Records Retention Schedule:**

As stated in [Element 5](#), the interim SFRS records retention schedule gives staff guidance on how long they should retain records and how to dispose of them at the end of their retention period, i.e. either destroy, archive or review. The full SFRS records retention schedule will ensure that all records in all formats are routinely assigned retention periods and disposal actions, disposal being either permanent destruction or transfer to an appropriate archive.

### **Records Disposal Form:**

Disposal will be recorded on the Records Disposal Form. The Records Disposal Form will provide the procedure to follow before the destruction of a record. This procedure will ensure that destruction has been authorised by the appropriate line manager and that appropriate checks have been made first. These checks will include that there is no ongoing Freedom of Information request, complaint or litigation relating to the record.

The Records Disposal Form will then be sent to the Records Management Officer for filing. In this way, the Records Management Officer will be able to maintain a Register of Disposal, which will log which records have been destroyed, when and by whom, in order to be able to prove compliance with relevant legislation, e.g. the Freedom of Information (Scotland) Act 2002 and the Data Protection Act 1998.

While a draft Records Disposal Form has already been created, records destruction arrangements (i.e. standard procedures and relevant contracts) across SFRS have still to be developed and implemented. The Disposal Form will not be issued for staff to use until a national solution for records destruction is in place; until then, staff will continue to

use local, legacy arrangements for records destruction. This is a combination of confidential waste consoles, secure destruction bags and in-house shredders.

**User Intelligence Group:**

A User Intelligence Group (UIG), set up by the Procurement department, met regularly between September 2016 and April 2017 to look into SFRS requirements for external records storage, records destruction and electronic records management solutions. The UIG members included both the Records Management Officer and the Information Governance Manager, who will ensure that all relevant issues are taken into consideration during the procurement of a records destruction solution. Any contracts set up will be to provide records management solutions only, not to contract out any functions of SFRS.

**Paper records held internally:**

The solution for the destruction of paper records held within SFRS premises is likely to incorporate the provision of confidential waste consoles and the regular emptying of these consoles by an external contractor. The records will then either be destroyed on site, e.g. in a mobile facility, or taken to the contractor's premises and destroyed there. A written contract will state exactly which services are provided and destruction certificates will be provided as proof that records have been destroyed.

During the Strategic Intent project, i.e. the rationalisation of the SFRS property portfolio, some staff were required to 'clear out' paper records, as they were moving location. They were provided with the Interim Records Retention Schedule to provide guidance as to what could be destroyed and what should be kept. Records which were to be destroyed were placed in confidential waste bags and collected by an external contractor for destruction. For example, Paper Shredding Services provided on site shredding at the premises in Lauriston Place, Edinburgh.

**Paper records held externally:**

For any paper records stored outwith SFRS by an external contractor which reach the end of their retention period, SFRS will request the destruction of these records. A written contract will state exactly which services are provided and destruction certificates will be provided as proof that records have been destroyed.

**Electronic records:**

The Records Management Policy states that SFRS will also introduce an electronic records management system, which will act as the main repository for SFRS records, except where the records are created, stored and used in other electronic 'line of business' systems or required in another format, e.g. paper.

In March 2014, members of the Information Governance, Corporate Communications and ICT departments met to discuss the implementation of an overall electronic records management solution for SFRS, e.g. SharePoint, to replace the existing legacy intranets and shared drives, which would include the migration of legacy information into a centralised location. However, there have been no further meetings on this topic at this stage. This is mainly due to other priorities and workloads set for the ICT department. The ICT Workstream 16 17 document from the Digital Steering Group included the 'Records Management' project, to review the 'requirements for corporate records management solution', with the status of 'Pipeline 17/18' and target end date of March 2018; however, in the Priority Workplan 201718 document, 'Records Management' is a 'low' priority, stating 'potentially shift to 18/19'.

Until such time as there is one main ERMS, records will continue to be stored in legacy intranets, legacy shared drives and department shared sites. Destruction of records in these systems is currently carried out on an ad hoc basis in line with the Interim Retention Schedule.

Any ERMS implemented will have the capacity to automate the application of retention and disposal arrangements as much as possible, while retaining proof of destruction, e.g. a metadata stub, and also ensuring that the destruction of a record is authorised using the Records Disposal Form.

SFRS has other line of business systems, which will be checked for the functionality to allow the systematic deletion of records at the end of their retention period. If this is not possible, SFRS will try to find a suitable methodology to impose control on these systems.

SFRS will investigate how to develop and implement records destruction arrangements for records in all formats, especially all electronic formats and locations, e.g. e-mail, recycle bins, folders/drives of employees who have left, etc.

**Hardware:**

SFRS has a contract in place with Haven Recycling for the secure destruction of obsolete hardware and any information that may still be stored on these. Hardware is stored securely on SFRS premises until it is collected and destroyed by the contractor. The contractor then provides SFRS with a destruction certificate.

**Backups:**

SFRS maintains a back-up of its electronic records and systems for business continuity purposes. The backup system stores backups initially on disk (SAN), then copies them across to other disk storage (SAN) in a different site, before sending them to tapes, which again are cycled and stored in offsite fire safes. Backups are carried out on different systems, according to the retention periods given in evidence E156. For the information currently held for 36 months, SFRS intends to reduce this to 12 months.

SFRS recognises the need to improve methods of records destruction, in terms of standardising arrangements throughout the Service, and, in particular, improving methods

for the destruction of electronic records. This will be greatly improved by the development and implementation of a main ERMS, the business classification scheme, records retention schedule and written guidance and procedures for staff.

The Records Management Officer will also develop processes/guidance to ensure that staff apply the records destruction arrangements to records in all systems and all formats. For example, as stated in the Records Management Policy, a Records Destruction Arrangements procedure will be issued.

The Records Management Officer's annual action plan includes the action to make SFRS-wide records destruction arrangements.

**Evidence**

E003	Records Management Policy
E040	Records Destruction Arrangements – TO FOLLOW
E027	Interim Records Retention Schedule
E029	Records Disposal Form (draft)
E041	Register of Disposal – TO FOLLOW
E021	User Intelligence Group agenda, 20/09/2016
E022	User Intelligence Group minutes, 14/10/2016
E023	User Intelligence Group minutes, 15/11/2016
E024	User Intelligence Group minutes, 14/12/2016
E025	User Intelligence Group minutes, 07/02/2017
E026	User Intelligence Group minutes, 07/04/2017
E038	Email issuing Records Retention Schedule to staff for Strategic Intent project (East Decommissioning), 17/02/2016
E039	Email issuing Records Retention Schedule to staff for Strategic Intent project (North Decommissioning), 08/07/2016
E042	Certificate of Destruction & Waste Transfer Note, Paper Shredding Services, 14/12/2016

E134	SharePoint meeting agenda, 26/03/2014
E019	ICT Workstream 16-17, Digital Steering Group update, 01/08/2016
E020	ICT Priority Workplan 201718, 10/03/2017
E043	Certificate of Collection and Processing of WEEE, Haven Recycling, 10/01/2017
E156	Email screenshot - Backup Retention Periods
E006	Records Management Action Plan
<b>Actions</b>	
A6.1	SFRS-wide records destruction arrangements will be developed and implemented
A6.2	This element will be reviewed following any development in the actions above or whenever any of the relevant evidence is reviewed
<b>Guidance</b>	
<a href="https://www.nrscotland.gov.uk/record-keeping/public-records-scotland-act-2011/resources/model-records-management-plan/model-plan-guidance-to-element-6">https://www.nrscotland.gov.uk/record-keeping/public-records-scotland-act-2011/resources/model-records-management-plan/model-plan-guidance-to-element-6</a>	

<b>ELEMENT 7 - ARCHIVING AND TRANSFER ARRANGEMENTS</b>
<p data-bbox="181 247 381 283"><b>Requirement</b></p> <p data-bbox="181 361 1388 499">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.</p> <p data-bbox="181 577 1372 667">Section 1(2)(b)(iii) of the Act specifically requires a RMP to make provision about the archiving and destruction, or other disposal, of an authority’s public records.</p> <p data-bbox="181 745 1421 835">An authority’s RMP <b>must</b> detail its archiving and transfer arrangements and ensure that records of enduring value are deposited in an appropriate archive repository.</p>
<p data-bbox="181 909 341 945"><b>Statement</b></p> <p data-bbox="181 1022 1404 1218">The SFRS Records Management Policy states that one of the ways in which SFRS will develop and implement effective records management is the establishment of record transfer arrangements to appropriate public archives of records of enduring, historical value.</p> <p data-bbox="181 1295 1421 1434">An explanation of what is meant by ‘archiving’ is provided in the Policy, i.e. ‘the disposal of records by permanently transferring them to a public archive and recording that such action has been taken’.</p> <p data-bbox="181 1512 1421 1707">An explanation of what is meant by ‘transfer’ is also provided, i.e. ‘the moving of records of enduring historical value from an organisation’s custody to that of a public archive for permanent preservation’, a ‘public archive’ being a ‘local authority archive or national archive’.</p>

The Policy lists as an associated document the Records Transfer Arrangements (to be created once SFRS-wide arrangements are in place), thus reinforcing to staff the importance of transfer arrangements in good records management practice.

As stated in [Element 5](#), the interim SFRS records retention schedule gives staff guidance on how long they should retain records and how to dispose of them at the end of their retention period. The full SFRS records retention schedule will ensure that all records in all formats are routinely assigned retention periods and disposal actions, disposal being either permanent destruction or transfer to an appropriate archive.

**Records Disposal Form:**

Disposal will be recorded on the Records Disposal Form. The Records Disposal Form will provide the procedure to follow before the disposal of a record. This procedure will ensure that disposal has been authorised by the appropriate line manager. The Records Disposal Form will then be sent to the Records Management Officer for filing. In this way, the Records Management Officer will be able to maintain a Register of Disposal, which will log which records have been archived.

While a draft Records Disposal Form has already been created, records transfer arrangements (i.e. standard procedures) have still to be developed and implemented. The Disposal Form will be issued once a national solution for records destruction is in place; this will be before the first SFRS records to be permanently archived reach the end of their retention period and, therefore, the Disposal Form will be used to record all transfers.

**Transfer to public archive:**

Records which are identified as being of enduring historical value will be transferred for permanent preservation to the National Records of Scotland (NRS). The Records

Management Officer's annual action plan includes the action to arrange a Memorandum of Understanding with the NRS.

The Records Management Officer (see [Element 2](#)) contacted NRS in July 2015 to make initial enquiries as to the suitability of, and mechanism for, setting up the transfer of historical records from SFRS to NRS. NRS confirmed that, as SFRS is a Scottish public authority with a national remit, it would be appropriate for NRS to take SFRS records of enduring value at a suitable time. Ms Allan met with members of the NRS Client Management Team in October 2015 to discuss potential future transfer arrangements. The main purpose of SFRS and the records it creates were discussed and NRS provided guidance on the selection of records and the transfer process, as well as an MoU template for consideration.

It was agreed that further discussions and development of the MoU would follow, once SFRS had a main Electronic Records Management System and Business Classification Scheme in place, so that electronic records for permanent preservation could be easily identified and also so that SFRS records for permanent preservation could reach the end of their retention period. Once the classification scheme is in place, records for permanent preservation can be more easily identified from the appropriate functions/activities/transactions listed.

The NRS client managers suggested making contact again in 6 months. However, as there has been no progress made since, in the development of the classification scheme (see [Element 4](#)), the Records Management Officer has not made contact to progress this, as there is nothing new to report at this stage.

Once progress is being made in the development and implementation of the classification scheme, the Records Management Officer will make contact again with the NRS client managers and work with them to identify SFRS records suitable for transfer to NRS, to develop a mechanism for the transfer of these records, especially for records in electronic

format, and to develop and finalise an MoU between NRS and SFRS, specifying timing of transfers and other terms and conditions.

Once an MoU has been developed, it will be presented to the SFRS Strategic Leadership Team for approval. Once approved, SFRS records reaching the end of their retention period, as per the retention schedule, will be processed and authorised, as per the records disposal form, for transfer to NRS for permanent preservation. Transfer will be recorded appropriately, e.g. in the SFRS Register of Disposal and by transfer certificates/receipts from NRS. Regular contact will be maintained between the SFRS Records Management Officer and the NRS Client Management Team to facilitate regular transfers of records and also to regularly review the MoU.

The finalised MoU between NRS and SFRS will also be submitted to the Keeper as evidence for the SFRS Plan.

The Records Management Officer's annual action plan includes the 'milestone' to develop a mechanism to transfer records of historical value to an appropriate archive repository.

**Evidence**

E003	Records Management Policy
E044	Records Transfer Arrangements – TO FOLLOW
E027	Interim Records Retention Schedule
E029	Records Disposal Form (draft)
E041	Register of Disposal – TO FOLLOW
E045	Email from Paul Carlyle, NRS, to Morag Penny, SFRS, re MoU and guidance documents, 29/07/2015
E046	Email from Jean Crawford, NRS, to Morag Penny, SFRS, re Depositor Guidance, 23/10/2015
E047	Email from Jean Crawford, NRS to Morag Allan, SFRS, re confirmation of meeting, 18/04/2017
E048	Memorandum of Understanding between NRS and SFRS – TO FOLLOW

E049	SLT covering report for approval of MoU – TO FOLLOW
E050	SLT minutes showing approval of MoU – TO FOLLOW
E051	Example transfer certificate/receipt from NRS – TO FOLLOW
E006	Records Management Action Plan
<b>Actions</b>	
A7.1	A Memorandum of Understanding between SFRS and NRS will be set up to implement a mechanism to transfer records of historical value
A7.2	This element will be reviewed following any development in the actions above or whenever any of the relevant evidence is reviewed
<b>Guidance</b>	
<a href="https://www.nrscotland.gov.uk/record-keeping/public-records-scotland-act-2011/resources/model-records-management-plan/model-plan-guidance-to-element-7">https://www.nrscotland.gov.uk/record-keeping/public-records-scotland-act-2011/resources/model-records-management-plan/model-plan-guidance-to-element-7</a>	

<p><b>ELEMENT 8 - INFORMATION SECURITY</b></p>
<p><b>Requirement</b></p>
<p>Information security is the process by which an authority protects its records and ensures they remain available. It is the means by which an authority guards against unauthorised access and provides for the integrity of the records. Robust information security measures are an acknowledgement that records represent a risk as well as an asset. A public authority should have procedures in place to assess and contain that risk.</p> <p>Section 1(2)(b)(ii) of the Act specifically requires a RMP to make provision about maintaining the security of information contained in the authority’s public records.</p> <p>An authority’s RMP <b>must</b> make provision for the proper level of security for its public records.</p>
<p><b>Statement</b></p>
<p>The SFRS Records Management Policy states that one of the ways in which SFRS will develop and implement effective records management is the establishment of appropriate information security policies and procedures to protect records from unauthorised access, use, disclosure, destruction or loss.</p> <p>The Policy lists as an associated document the Information Security Handbook, thus reinforcing to staff the importance of information security in good records management practice.</p> <p>The commitment by SFRS to information security is stressed by the inclusion in the employee Code of Conduct of a section on ‘Use of SFRS Equipment or Resources’, outlining the responsibilities in the proper use of and access to equipment and resources, including computer hardware, software and network connectivity and referring staff to the</p>

ICT Acceptable Use Policy. The Code of Conduct came into effect on 1 February 2015. All staff were asked to familiarise themselves with the Code and to confirm that they had read and understood it.

SFRS has issued an Information Security Handbook to ensure staff are fully aware of their responsibilities and are able to carry out their duties in a safe and responsible manner. The Handbook affirms the SFRS commitment to safeguarding its information from unauthorised access, disclosure or modification to ensure its confidentiality, integrity and availability. The Handbook ensures that staff have a clear understanding and guidance in relation to specific areas of information security.

In order to enable staff to meet the Service's information security requirements, the Handbook includes detailed guidance on specific areas, such as ICT Acceptable Use, Network Passwords, Secure Desks and Secure Email. Individual policies on three of these four areas have also been issued, while the fourth (Secure Email) is currently in draft.

The Acceptable Use Policy details the requirements of staff whilst utilising SFRS ICT equipment and systems, to protect the individual user and also the organisation from any risk. It states that all staff are responsible for ensuring they read, understand and comply with the policy. It will be a mandatory requirement for staff to confirm this, when completing the Data Protection and Information Security e-learning module.

Reports on the draft policies were presented to the SMT on 23 November 2015 and, subject to certain amendments, approved to go out for consultation. The documents were issued on 26 September 2017 to key internal stakeholders for comment.

The finalised Handbook and Policies were then uploaded to the SFRS Intranet on 26 October 2017 for staff reference and their issue announced to all staff.

SFRS intends to issue a Security Strategy to define the Service's overall information security management framework. This demonstrates a commitment by SFRS at strategic level to safeguard the confidentiality, integrity and availability of all information assets.

Information for staff is available on the SFRS Intranet on the Information Governance pages, along with contact details for the Information Security Officer, who has day-to-day responsibility for information security within SFRS.

The Information Security Officer has developed draft Secure Email Policy and User Guide documents for staff to assist them in using the Egress Switch software, which SFRS uses to securely share confidential information with its partners. Egress Switch is a UK Government CPA Foundation Grade certified email encryption product, which means it is suitable for sharing OFFICIAL AND OFFICIAL-SENSITIVE data under the Government Classification Scheme 2014. The Information Security Officer is responsible for creating and revoking licences within the system, in addition to providing assistance to users and monitoring usage/future requirements.

For example, the Information Security Officer and Information Governance Manager have hosted a series of training sessions for secure email users across the Service. The sessions consisted of a presentation outlining the linked issues of information security, data protection and information sharing and a demonstration of how the secure email system should be used to comply with requirements in these areas. Afterwards, staff were asked for feedback on the sessions and a record kept in the electronic HR system that they have completed this training activity.

The Information Governance department have also hosted a series of data protection awareness seminars throughout Scotland for SFRS staff. These seminars have included guidance about information security measures, in terms of data protection and information sharing. Delegates have received copies of the presentations to take away, as well as copies of the ICO's Access Aware posters, tailored for SFRS.

Further seminars will be held in the future, targeted at particular departments and their particular needs, e.g. Personnel, Community Safety Engagement.

The Information Security Officer has also developed an e-learning package, including information security, based on the Government's Protecting Information package, which all staff will have to complete on an ongoing basis, every 3 years. New employees will also sit this assessment as part of their induction.

The Records Management Officer's annual action plan includes the 'milestone' to develop robust information security measures to protect records. This sits under the remit of the Information Security Officer, who will work with the Records Management Officer on the relevant records management issues.

**Evidence**

E003	Records Management Policy
E082	Code of Conduct
E083	Acknowledgement of Receipt of Code of Conduct
E084	Intranet screenshot – News item re SFRS Code of Conduct, 17/12/2014
E085	Intranet screenshot – News item re SFRS Code of Conduct now effective, 02/02/2015
E052	Information Security Handbook
E053	Acceptable Use Policy
E054	Network Password Policy
E055	Secure Desk Policy
E056	Secure Email Policy (draft)
E057	Secure Email User Guide (draft)
E058	SMT covering report for approval of Acceptable Use Policy for consultation, 23/11/2015

E059	SMT covering report for approval of Network Password Policy for consultation, 23/11/2015
E062	SMT covering report for approval of Secure Desk Policy for consultation, 23/11/2015
E031	SMT minutes showing approval of Information Security documents for consultation, 23/11/2015
E142	Email issuing Information Security documents for consultation, 26/09/2017
E060	Intranet screenshot – News Item re Issue of Information Security documents, 26/10/2017
E061	Intranet screenshot – Information Security Handbook available to staff
E153	Intranet screenshot – Acceptable Use Policy available to staff
E154	Intranet screenshot – Network Password Policy available to staff
E155	Intranet screenshot – Secure Desk Policy available to staff
E063	Intranet screenshot – Information Security information for staff
E147	Email Invite to Secure Email Training, 12/09/2017
E148	Secure Email Training session agenda, 04/10/2017
E149	Secure Email Training session presentation, 04/10/2017
E150	Email requesting Feedback from Secure Email Training, 06/10/2017
E151	Email requesting Record of Secure Email Training, 17/10/2017
E064	Data Protection Awareness Seminars – ICO presentation
E065	Data Protection Awareness Seminars – SFRS presentation
E066	Data Protection Awareness Seminars – Take Care with Attachments poster
E067	Data Protection Awareness Seminars – Subject Access Request 1 poster
E068	Data Protection Awareness Seminars – Keep Your Work Area Clear poster
E069	Data Protection Awareness Seminars – Subject Access Request 2 poster
E070	Data Protection Awareness Seminars – Don't Just Give It Away poster
E071	Data Protection Awareness Seminars – Subject Access Request 3 poster
E072	Data Protection Awareness Seminars – If In Doubt, Find Out poster

E073	Data Protection Awareness Seminars – Subject Access Request 4 poster
E074	Data Protection Awareness Seminars – Wear Your Pass poster
E075	Data Protection Awareness Seminars – FOI Request poster
E076	Data Protection Awareness Seminars – Aware of Protectively Marking poster
E077	Data Protection Awareness Seminars – Subject Access Request 5 poster
E078	Data Protection Awareness Seminars – Sharing Personal Information poster
E079	Data Protection Awareness Seminars – Subject Access Request 6 poster
E080	Elearning screenshot – Menu
E143	Elearning screenshot – Secure Email
E144	Elearning screenshot – Government Security Classifications
E146	Elearning screenshot - Assessment
E152	SMT covering report for approval of Elearning module (draft)
E006	Records Management Action Plan
<b>Actions</b>	
A8.1	Robust information security measures will be developed to protect records.
A8.2	This element will be reviewed following any development in the actions above or whenever any of the relevant evidence is reviewed.
<b>Guidance</b>	
<a href="https://www.nrscotland.gov.uk/record-keeping/public-records-scotland-act-2011/resources/model-records-management-plan/model-plan-guidance-to-element-8">https://www.nrscotland.gov.uk/record-keeping/public-records-scotland-act-2011/resources/model-records-management-plan/model-plan-guidance-to-element-8</a>	

<b>ELEMENT 9 - DATA PROTECTION</b>
<b>Requirement</b>
<p>An authority that handles personal information about individuals has a number of legal obligations to protect that information under the Data Protection Act 1998.</p> <p>The Keeper will expect an authority's RMP to indicate compliance with its data protection obligations.</p>
<b>Statement</b>
<p>The SFRS Records Management Policy states that one of the ways in which SFRS will develop and implement effective records management is the establishment of appropriate data protection policies and procedures to ensure that the management of records containing personal data complies with the Data Protection Act 1998 (DPA).</p> <p>The Policy lists as an associated document the Data Protection Policy, thus reinforcing to staff the importance of data protection in good records management practice.</p> <p>SFRS provides a range of prevention and emergency response services to the communities of Scotland. In order to do this, we keep essential personal information about people within our Service and also people who use our services. The nature and amount of personal information that we need to collect and keep will vary depending on the services used.</p> <p>SFRS fully endorses the principles of the DPA and is committed to complying with its requirements, by ensuring that any personal information we hold is accurate, up-to-date, used only for the intended purpose and is securely protected from inappropriate access.</p>

SFRS is registered as a data controller with the Information Commissioner's Office. The registration number is Z3555625. The entry in the public register can be found on the ICO website here: <https://ico.org.uk/ESDWebPages/Entry/Z3555625>

The commitment by SFRS to data protection is stressed by the inclusion in the employee Code of Conduct of a section on 'Information Access and Confidentiality', outlining the requirements of the Freedom of Information (Scotland) Act 2002 and the DPA, stating the eight Data Protection Principles and referring staff to the Access to Information Policy and to the Data Protection Officers for further guidance. The Code of Conduct came into effect on 1 February 2015. All staff were asked to familiarise themselves with the Code and to confirm that they had read and understood it.

The Data Protection Policy was issued in March 2013, to be in place for Day 1 of SFRS (see [Introduction](#)). The policy was last reviewed on 24 October 2017 and is next due for review in October 2020. It is available on the SFRS Intranet and also on the SFRS public website. The Policy ensures that personal information will be processed in a fair and lawful manner.

SFRS also has related procedures in place to ensure that personal information is processed in accordance with the DPA, i.e. the 'Processing Personal Data Procedure' and the 'Subject Access Requests Procedure'.

Information for staff is available on the SFRS Intranet on the Information Governance pages, along with contact details for the Freedom of Information/Data Protection Officers, who have day-to-day responsibility for compliance with the Data Protection Act within SFRS.

The Information Governance department have hosted a series of data protection awareness seminars throughout Scotland for SFRS staff. These seminars have included presentations from the Information Commissioner's Office on the Data Protection Act and also presentations on issues specific to SFRS. Delegates have received copies of the

presentations to take away, as well as copies of the ICO's Access Aware posters, tailored for SFRS. Further seminars will be held in the future, targeted at particular departments and their particular needs, e.g. Personnel, Community Safety Engagement.

The Information Security Officer and Information Governance Manager have also hosted a series of training sessions for secure email users across the Service. The sessions consisted of a presentation outlining the linked issues of information security, data protection and information sharing and a demonstration of how the secure email system should be used to comply with requirements in these areas. Afterwards, staff were asked for feedback on the sessions and a record kept in the electronic HR system that they have completed this training activity.

The Information Security Officer has also developed an e-learning package, including data protection, based on the Government's Protecting Information package, which all staff will have to complete on an ongoing basis, every 3 years. New employees will also sit this assessment as part of their induction.

SFRS has also produced guidance for the public in relation to the Service's responsibilities under the DPA. The Privacy Statement tells individuals what we do with their personal information, why we need it, how we will use it and how we will share it. Guidance on 'Accessing your Personal Information (Subject Access)', the 'Subject Access Requests Procedure', as well as the Data Protection Policy and the 'Subject Access Form', are available on the SFRS website at: <http://www.firescotland.gov.uk/access-to-information/data-protection.aspx>. Also available to the public on the SFRS website is the Access to Information Policy at <http://www.firescotland.gov.uk/access-to-information.aspx>

The Records Management Officer's annual action plan includes the 'milestone' to ensure compliance with the Data Protection Act and develop appropriate processes. This sits under the remit of the Freedom of Information/Data Protection Officers, who will work with the Records Management Officer on the relevant records management issues.

<b>Evidence</b>	
E003	Records Management Policy
E081	SFRS ICO Registration Details
E082	Code of Conduct
E083	Acknowledgement of Receipt of Code of Conduct
E084	Intranet screenshot – News item re SFRS Code of Conduct, 17/12/2014
E085	Intranet screenshot – News item re SFRS Code of Conduct now effective, 02/02/2015
E086	Data Protection Policy
E087	Processing Personal Data Procedure
E088	Subject Access Requests Procedure
E089	Intranet screenshot – Data Protection information available to staff
E064	Data Protection Awareness Seminars – ICO presentation
E065	Data Protection Awareness Seminars – SFRS presentation
E066	Data Protection Awareness Seminars – Take Care with Attachments poster
E067	Data Protection Awareness Seminars – Subject Access Request 1 poster
E068	Data Protection Awareness Seminars – Keep Your Work Area Clear poster
E069	Data Protection Awareness Seminars – Subject Access Request 2 poster
E070	Data Protection Awareness Seminars – Don't Just Give It Away poster
E071	Data Protection Awareness Seminars – Subject Access Request 3 poster
E072	Data Protection Awareness Seminars – If In Doubt, Find Out poster
E073	Data Protection Awareness Seminars – Subject Access Request 4 poster
E074	Data Protection Awareness Seminars – Wear Your Pass poster
E075	Data Protection Awareness Seminars – FOI Request poster
E076	Data Protection Awareness Seminars – Aware of Protectively Marking poster
E077	Data Protection Awareness Seminars – Subject Access Request 5 poster
E078	Data Protection Awareness Seminars – Sharing Personal Information poster
E079	Data Protection Awareness Seminars – Subject Access Request 6 poster
E147	Email Invite to Secure Email Training, 12/09/2017
E148	Secure Email Training session agenda, 04/10/2017

E149	Secure Email Training session presentation, 04/10/2017
E150	Email requesting Feedback from Secure Email Training, 06/10/2017
E151	Email requesting Record of Secure Email Training, 17/10/2017
E080	Elearning screenshot – Menu
E090	Elearning screenshot – Data Protection
E146	Elearning screenshot - Assessment
E152	SMT covering report for approval of Elearning module (draft)
E091	SFRS website – Data Protection information available to public
E092	Privacy Statement
E093	Subject Access Public Guidance
E094	Subject Access Form
E095	Access to Information Policy
E006	Records Management Action Plan
<b>Actions</b>	
A9.1	Appropriate processes will be developed to ensure compliance with the Data Protection Act 1998.
A9.2	This element will be reviewed following any development in the actions above or whenever any of the relevant evidence is reviewed.
<b>Guidance</b>	
<a href="https://www.nrscotland.gov.uk/record-keeping/public-records-scotland-act-2011/resources/model-records-management-plan/model-plan-guidance-to-element-9">https://www.nrscotland.gov.uk/record-keeping/public-records-scotland-act-2011/resources/model-records-management-plan/model-plan-guidance-to-element-9</a>	

<b>ELEMENT 10 - BUSINESS CONTINUITY AND VITAL RECORDS</b>
<p data-bbox="180 247 380 281"><b>Requirement</b></p> <p data-bbox="180 359 1357 501">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.</p> <p data-bbox="180 579 1443 665">The Keeper will expect an authority’s RMP to indicate arrangements in support of records vital to business continuity.</p>
<p data-bbox="180 747 337 781"><b>Statement</b></p> <p data-bbox="180 858 1438 1052">The SFRS Records Management Policy states that one of the ways in which SFRS will develop and implement effective records management is the establishment of a business continuity plan, which includes the identification of the records which are vital to the operation of SFRS.</p> <p data-bbox="180 1129 1390 1436">An explanation of what is meant by ‘vital record’ is provided in the Policy, i.e. ‘the very small number of an organisation’s records which are essential to the running of an organisation, e.g. records which, if you could not access them, it would have a considerable and very serious impact on the organisation or records which are irreplaceable and, if you were unable to produce them, the long-term consequences would be very serious’.</p> <p data-bbox="180 1514 1443 1766">An explanation of what is meant by ‘business continuity’ is also provided, i.e. ‘a continuous process that helps an organisation anticipate, prepare for, prevent, respond to and recover from disruptions, whatever their source and whatever aspect of the business they affect; it establishes a generic framework that can be applied to a range of potential disruptions, whether impacting staff, properties, systems or external providers’.</p>

The Policy lists as an associated document the Business Continuity Policy, thus reinforcing to staff the importance of business continuity in good records management practice.

**Business Continuity Policy:**

SFRS is a Category One responder under the Civil Contingencies Act 2004 (CCA) and, in line with the Act, will maintain Business Continuity Plans to ensure that it can continue to exercise its functions in the event of an emergency, so far as is reasonably practicable.

A Business Continuity Policy is currently in draft, written by the Risk & Audit Manager. The Policy states that SFRS has established a formal structure for Business Continuity Management to ensure that it is given the correct level of importance within the organisation, with overall responsibility resting with the Chief Officer, as Accountable Officer. Scrutiny of the process will be undertaken through the Board's Audit & Risk Committee. This, along with the inclusion of the posts of Risk & Audit Manager and Civil Contingencies Officers within the organisational structure, demonstrates a commitment by SFRS to Business Continuity and Business Continuity Plans. Regular reviews by Internal Audit and directorate management will ensure that Business Continuity Plans remain fit for purpose, with a suitable level of resilience.

**Business Continuity Plans:**

The Business Continuity Plan Guidance Note and Business Impact Assessment provides a template for directorates to use in developing Business Continuity Plans in a consistent and documented way, to ensure that critical services can be maintained to a set standard in the event of a business disruption.

A Business Continuity Plan lists emergency response team contact details, mitigation measures in place, local contingency arrangements, additional resources required, other

considerations for continuity management, internal interdependencies and external interdependencies. Under Additional Resources Required, staff are reminded that:

‘In relation to Vital Records, they should consider the information SFRS cannot work without and how this would be replaced and how this replaced information will be stored.’

It is intended that an information audit will be carried out to provide relevant information for the Records Retention Schedule (see [Element 5](#)) and also the Business Classification Scheme (see [Element 4](#)), including the identification of vital records, so that these records can receive the extra storage and security considerations required (see [Element 6](#), [Element 8](#) and [Element 9](#)) and be included in Business Continuity Plans.

The Records Management Officer will ensure that all records management issues, including the identification and protection of vital records, are taken into consideration during the development and implementation of Business Continuity Plans.

The Records Management Officer will also develop processes/guidance to enable staff to apply appropriate measures for the identification and protection of vital records.

The Records Management Officer’s annual action plan includes the action to develop arrangements in support of records vital to business continuity. Business Continuity sits under the remit of the Risk & Audit Manager, who will work with the Records Management Officer on issues relating to vital records.

**Evidence**

E003	Records Management Policy
E096	Business Continuity Policy and Guidance (draft)
E097	SLT report for approval of Business Continuity Policy – TO FOLLOW
E098	SLT minutes showing approval of Business Continuity Policy – TO FOLLOW
E099	Intranet screenshot – Business Continuity documents available to staff – TO FOLLOW

E006	Records Management Action Plan
<b>Actions</b>	
A10.1	Arrangements in support of records vital to business continuity will be developed
A10.2	This element will be reviewed following any development in the actions above or whenever any of the relevant evidence is reviewed
<b>Guidance</b>	
<a href="https://www.nrscotland.gov.uk/record-keeping/public-records-scotland-act-2011/resources/model-records-management-plan/model-plan-guidance-to-element-10">https://www.nrscotland.gov.uk/record-keeping/public-records-scotland-act-2011/resources/model-records-management-plan/model-plan-guidance-to-element-10</a>	

<b>ELEMENT 11 - AUDIT TRAIL</b>
<b>Requirement</b>
<p>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.</p> <p>The Keeper will expect an authority's RMP to provide evidence that the authority maintains a complete and accurate representation of all changes that occur in relation to a particular record.</p>
<b>Statement</b>
<p>The SFRS Records Management Policy states that one of the ways in which SFRS will develop and implement effective records management is the introduction of audit trail mechanisms in order to capture the key events in a record's lifecycle.</p> <p>An explanation of what is meant by 'audit trail' is provided in the Policy, i.e. 'the mechanism by which an organisation monitors the movement and/or editing of a record'.</p> <p>An explanation of what is meant by 'lifecycle' is also provided, i.e. 'the steps in the life of a record, from its creation, through its maintenance and use as long as it has continuing value, to its disposal, either by destruction or by transfer to an archive for permanent preservation'.</p> <p><b>Electronic records:</b></p> <p>Electronic systems used by the eight legacy services, prior to their merger into one national service on 1 April 2013, are still used, e.g. shared drives and intranets, although staff are discouraged from adding new material to them. Departments across Scotland now have Office 365 'shared sites', where they can upload and share information with other department members, regardless of their locations. There is currently no standard</p>

audit trail mechanism in use across these systems and sites, with no control over records being added, deleted, moved, edited or renamed.

### **Electronic Records Management System:**

The Records Management Policy states that SFRS will introduce an electronic records management system, which will act as the main repository for records, except where the records are created, stored and used in other electronic 'line of business' systems or required in another format, e.g. paper.

An explanation of what is meant by 'electronic records management system' is provided in the Policy, i.e. 'an automated system used to manage the creation, use, maintenance and disposal of electronic records; it should be used to manage records within classification schemes, apply retention schedules and control access and use; it should also be able to maintain a record along with its associated metadata'.

In March 2014, members of the Information Governance, Corporate Communications and ICT departments met to discuss the implementation of an overall electronic records management solution for SFRS, e.g. SharePoint, to replace the existing legacy intranets and shared drives, which would include the migration of legacy information into a centralised location. However, there have been no further meetings on this topic. This is mainly due to other priorities and workloads set for the ICT department. The ICT Workstream document from the Digital Steering Group includes the 'Records Management' project, to review the 'requirements for corporate records management solution', with the status of 'Pipeline 17/18' and target end date of March 2018; however, in the Priority Workplan 201718 document, 'Records Management' is a 'low' priority, stating 'potentially shift to 18/19'.

Until such time as there is one main electronic system, records will continue to be stored in legacy intranets, legacy shared drives and department shared sites. The

implementation of a main ERMS will greatly improve the audit trail functionality for electronic records.

**User Intelligence Group:**

A User Intelligence Group (UIG), set up by the Procurement department, met regularly between September 2016 and April 2017 to look into SFRS requirements for external records storage, records destruction and electronic records management solutions. The UIG members include both the Records Management Officer and the Information Governance Manager, who will ensure that all records management issues, including the application of audit trails, are taken into consideration during the procurement of an ERMS. Any contracts set up will be to provide records management solutions only, not to contract out any functions of SFRS.

SFRS will investigate the possibility of using an audit trail mechanism for line of business systems, although this may not be possible, depending on how the systems are set up., e.g. IRS, the incident recording system is a UK-wide system for inputting details and gathering statistics for incidents attended by fire and rescue services. If this is not possible, SFRS will try to find a suitable methodology to impose audit trail mechanisms on these systems.

**File Naming Conventions:**

The implementation of audit trail mechanisms will include the use of File Naming Conventions and version control. SFRS has developed a File Naming Conventions Guidance document. A report on the draft Guidance was presented to the Senior Management Team (SMT, which sits below the SLT and includes the Head of Strategic Planning and Performance in its members) on 22 March 2017 and approved to go out for consultation. The Guidance was issued on 6 April 2017 to key internal stakeholders for comment.

The finalised File Naming Conventions Guidance was issued on 21 September 2017 for all SFRS staff to use when creating and managing their electronic records. The Guidance was uploaded to the SFRS Intranet for staff reference and its issue announced to all staff. An email was also issued to Heads of Function on 22 September 2017, asking them to bring the Guidance to the attention of their staff.

As the Report to SMT stated, File Naming Conventions are an essential component in the introduction of both an Electronic Records Management System and a Business Classification Scheme to enable the efficient storage, retrieval and disposal of records.

However, the Conventions can still be used before the ERMS and BCS are implemented, as they will improve the management of any electronic files, particularly in shared storage areas. In fact, the prior implementation of the Conventions would facilitate the transfer of files from shared storage areas into an ERMS in the future.

The Records Management Policy lists as an associated document the Naming Convention Guidance, thus reinforcing to staff the importance of file naming conventions in good records management practice.

### **Version Control:**

The File Naming Conventions Guidance includes guidelines on applying version control. As well as this general advice, all SFRS 'controlled documents' are subject to version control. Controlled documents include Policies, Procedures, Standard Operating Procedures, Control Operating Procedures, Technical Information Notes, General Information Notes, Awareness Briefings and Urgent Instructions. The templates for these types of documents include the version number and issue date.

The Records Management Officer is responsible for the management of these controlled documents, as well as providing general document control advice to staff for all other documents. All controlled documents come to the RMO for the checking of formatting,

version control, etc. before they are issued to staff on the Intranet. The RMO ensures that reviews and amendments to these documents are tracked and maintains an audit trail for them.

**Paper records:**

Paper records are currently stored in various locations across SFRS. Some records are stored in office locations, while others are kept in internal or external stores, using legacy arrangements, for example in storage in Livingston with Iron Mountain and in Claverhouse, Dundee with Dundee City Council.

There is currently no standard audit trail mechanism for SFRS paper records. SFRS recognise that there is a need for better management of paper records and will investigate the best way to impose an audit trail mechanism on its paper records, so that the location of a record is known at all times. This may be through the use of tools such as markers left in place of a record or a logging out sheet held in each location.

As stated above, the UIG are looking into requirements for a SFRS-wide external records storage solution. Once a national solution has been set up, SFRS will ensure that there is an audit trail mechanism in place with the storage provider to track the movement of records in and out of storage.

As stated in [Element 7](#), records identified as being of enduring historical value will be transferred for permanent preservation to the NRS. The Records Management Officer will maintain a Register of Disposal, which will log records which have been transferred, thus maintaining an audit trail to track the movement of archived records.

**Audit trail mechanism – development:**

The Records Management Officer's annual action plan includes the 'milestone' to develop an audit trail mechanism that records the movement of records within the ICT

infrastructure or out of the ICT infrastructure, in order to know where records are at any given time and to have robust version control.

The Records Management Officer's annual action plan also includes the 'milestone' to develop a Corporate Document Framework as part of the 'implementation of structured and systematic approach to the development, review, ratification, dissemination and retention of procedural documents'. While a procedure currently exists and those members of staff who are regularly involved in the production of such documents follow it, it is not formalised in a document. The production of such a Framework will further improve the audit trail mechanism for SFRS controlled documents.

**Evidence**

E003	Records Management Policy
E134	SharePoint meeting agenda, 26/03/2014
E019	ICT Workstream 16-17, Digital Steering Group update, 01/08/2016
E020	ICT Priority Workplan 2017-18, 10/03/2017
E021	User Intelligence Group agenda, 20/09/2016
E022	User Intelligence Group minutes, 14/10/2016
E023	User Intelligence Group minutes, 15/11/2016
E024	User Intelligence Group minutes, 14/12/2016
E025	User Intelligence Group minutes, 07/02/2017
E026	User Intelligence Group minutes, 07/04/2017
E100	File Naming Conventions Guidance
E101	SMT report re approval of File Naming Conventions Guidance for consultation, 22/03/2017
E034	SMT minutes showing approval to issue Records Retention Schedule and approval to issue File Naming Conventions Guidance for consultation, 22/03/2017
E136	Email issuing File Naming Conventions Guidance for consultation, 06/04/2017
E102	Intranet screenshot – News Item re Issue of File Naming Conventions Guidance, 21/09/2017

E103	Intranet screenshot – File Naming Conventions Guidance available to staff
E138	Email issuing File Naming Conventions Guidance to Heads of Function, 22/09/2017
E006	Records Management Action Plan
E139	Iron Mountain Agreement with Strathclyde Fire & Rescue, 21/01/2008
E140	Iron Mountain Invoice to SFRS, 31/08/2017
E141	Tayside Fire & Rescue Lease of Dundee City Council Storage, 08/07/2008
<b>Actions</b>	
A11.1	An audit trail mechanism will be developed that records the movement of records, in order to know where records are at any given time and to have robust version control
A11.2	A Corporate Document Framework will be developed as part of the implementation of a structured and systematic approach to the development, review, ratification, dissemination and retention of procedural documents
A11.3	This element will be reviewed following any development in the actions above or whenever any of the relevant evidence is reviewed
<b>Guidance</b>	
<a href="https://www.nrscotland.gov.uk/record-keeping/public-records-scotland-act-2011/resources/model-records-management-plan/model-plan-guidance-to-element-11">https://www.nrscotland.gov.uk/record-keeping/public-records-scotland-act-2011/resources/model-records-management-plan/model-plan-guidance-to-element-11</a>	

**ELEMENT 12 - COMPETENCY FRAMEWORK FOR RECORDS MANAGEMENT STAFF**

**Requirement**

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.

The Keeper will expect an authority's RMP to detail a competency framework for person(s) designated as responsible for the day-to-day operation of activities described in the elements in the authority's RMP.

**Statement**

SFRS recognises that records management is a separate business activity from general office duties and that it is best implemented by a person possessing the relevant skills. This is shown by the fact that a separate post exists for the Records Management Officer (see [Element 2](#)).

The SFRS Records Management Policy states that the Records Management Officer has 'day-to-day operational responsibility for records management, for implementing the Records Management Plan and for ensuring compliance with this policy and the Plan. The Records Management Officer will be responsible for ensuring that relevant procedures, systems and practices are in place, for providing appropriate guidance and training to staff and for reviewing this policy on a two-yearly basis, or as required'.

The SFRS Records Management Policy states that one of the ways in which SFRS will develop and implement effective records management is the introduction of a competency framework for records management staff, to ensure that records management within SFRS is carried out in a professional manner and meets the requirements of relevant legislation, codes of practice, standards and best practice.

An explanation of what is meant by 'competency framework' is provided in the Policy, i.e. 'a competency framework lists the core competencies and the key knowledge and skills required by staff; it can be used as a basis for developing job specifications, identifying training needs and assessing performance'.

**Action plans:**

Evidence that SFRS considers records management to be a specific business activity requiring specific skills is further given in the Records Management Officer's action plan, which sets milestones and actions to be achieved in each financial year.

The Records Management Officer's annual action plan includes the 'milestone' to develop a competency framework of the knowledge and skills required for records management staff identifying training needs and assessing performance.

Individual objectives form part of the Information Governance department action plan, which then feeds into the SFRS Annual Operating Plan. The objective to 'prepare and implement a Records Management Plan' and some of its milestones was included in the SFRS Annual Operating Plan 2015-2016, which is available on the SFRS website.

**Appraisal process:**

SFRS operates an appraisal process, which went live on 1 April 2016. The appraisal process helps staff to help improve performance by focusing on both the achievement of objectives (what is done), as well as an appraisal of skills, knowledge, behaviours and competencies (how it is done). The overall aim is for all employees to be competent in the roles they carry out, to take responsibility for their own performance, skills and behaviours and to ensure that these align to promote the SFRS Values of Safety, Teamwork, Respect and Innovation. The process is a joint review and discussion between an individual and their manager to review performance over the past year and

set development opportunities and objectives for the forthcoming year. All employees have an annual and at least one interim appraisal meeting.

The SFRS Appraisal Policy and Procedure document gives the objectives, principles, responsibilities, guidelines and procedure for the process. An Appraisal Policy and Procedure FAQs document has also been created to help staff to understand the process. The Self-Appraisal Questionnaire encourages employees to prepare in advance by considering their own performance over the past year. The Appraisal Proforma is used to record and monitor performance throughout the annual review cycle and includes mandatory key work objectives for all staff, additional key work objectives applicable to the role and a personal development plan to identify any development/training needs.

The Records Management Officer's Appraisal Proforma 2016/17 shows her objectives and development plan for the past year and the Proforma 2017/18 shows the objectives and plan for the coming year.

Thus, the appraisal process acts as a competency framework for the Records Management Officer, by identifying training needs and assessing performance on a regular basis.

**Current awareness:**

The Records Management Officer's annual action plan includes the 'action' to maintain CPD – read professional journals, attend seminars/conferences, etc.

The Records Management Officer has access to the latest thinking in the field of records management. She maintains current awareness of issues in the records management world and is a member of the Information and Records Management Society and attends the IRMS Scotland Group events, where she also maintains contact with records management staff throughout the Scottish public sector and other sectors. The Records Management Officer will also attend any other relevant records management training,

conferences, etc. as and when identified. For example, she attended an IG Scotland PRSA masterclass on 4 February 2014 and a series of workshops (spread over November 2016 to March 2017) on the Archives and Records Management Services (ARMS) Quality Improvement Tool, developed by the Scottish Council on Archives.

SFRS will support appropriate continuing professional development for the Records Management Officer and will also consider any appropriate formal qualifications in records management relevant to the post, within budgetary constraints, e.g. the qualifications and modules offered by the Centre for Archive and Information Studies at the University of Dundee.

**Training for other staff:**

The Records Management Officer's annual action plan includes the action to develop RM training for other staff.

One of the Records Management Officer's key tasks is to provide advice, guidance, training and support to SFRS staff on all records management issues. This is provided via records management procedures, systems and practices, as well as via training. SFRS will provide training and development support to ensure that all staff are aware of their records management responsibilities, as given in the Records Management Policy.

The Policy acts as a starting point for staff to understand the principles of records management, the arrangements within SFRS and their responsibilities. As well as those of the Records Management Officer, the Policy states the responsibilities of the Information Governance Manager, the Director of Strategic Planning, Performance and Communications (see [Element 1](#)), Heads of Departments/Functions, line managers and all SFRS staff.

The Information Security Officer is currently developing an e-learning package, based on the Government's 'Protecting Information' package, which all staff will have to complete,

on an ongoing basis, every 3 years. Although this package currently only covers data protection and information security, SFRS intends to add a records management module to complement these. A module will either be developed in-house or an appropriate external training package will be procured.

The Information Governance department have hosted a series of data protection awareness seminars throughout Scotland for SFRS staff (see [Element 9](#)). These seminars have concentrated on data protection but have also touched on records management basics and introduced staff to the department and their tasks and responsibilities, including those of the Records Management Officer. Further seminars will be held in the future, targeted at particular departments and their particular needs, including, where relevant, records management issues, as they relate to data protection.

Information for staff is available on the SFRS Intranet on the Information Governance pages, along with contact details for the Records Management Officer, who has day-to-day responsibility for records management within SFRS.

SFRS will implement any other relevant records management training, as and when required. For example, once a full SFRS electronic records management system is implemented, staff will receive training in elements such as the file classification scheme (see [Element 4](#)), version control, file naming, etc. Training may be face-to-face, online or via written guidance, as deemed most appropriate.

SFRS will keep training arrangements under regular review to ensure that they continue to meet the needs of staff and that all staff are kept up-to-date with changes in practice and legislation.

**Evidence**

E003	Records Management Policy
E006	Records Management Action Plan
E104	Information Governance Action Plan 2017-2020 – TO FOLLOW

E105	Annual Operating Plan 2015-2016
E106	Intranet screenshot – Appraisal Process information available to staff
E107	Appraisal Policy and Procedure
E108	Appraisal Policy and Procedure FAQs
E109	Records Management Officer appraisal proforma, 2016/17
E110	Records Management Officer appraisal proforma, 2017/18
E111	RMO Attendance at IG Scotland PRSA masterclass, 04/02/2014
E112	RMO Attendance at SCA workshops on ARMS Quality Improvement Tool, Nov 2016 – Mar 2017
E113	Elearning screenshot – Records Management module – TO FOLLOW
E065	Data Protection Awareness Seminars – SFRS presentation
E007	Intranet screenshot – Information Governance information available to staff
E008	Intranet screenshot – Records Management information available to staff
<b>Actions</b>	
A12.1	A competency framework of the knowledge and skills required for records management staff, identifying training needs and assessing performance, will be maintained and regularly reviewed through the SFRS Appraisal process
A12.2	The Records Management Officer’s CPD will be maintained by reading professional journals, attending seminars/conferences, etc.
A12.3	This element will be reviewed following any development in the actions above or whenever any of the relevant evidence is reviewed
<b>Guidance</b>	
<a href="https://www.nrscotland.gov.uk/record-keeping/public-records-scotland-act-2011/resources/model-records-management-plan/model-plan-guidance-to-element-12">https://www.nrscotland.gov.uk/record-keeping/public-records-scotland-act-2011/resources/model-records-management-plan/model-plan-guidance-to-element-12</a>	

<b>ELEMENT 13 - ASSESSMENT AND REVIEW</b>
<b>Requirement</b>
<p>Regular self-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.</p> <p>Section 1(5)(i)(a) of the Act says that an authority must keep its RMP under review.</p> <p>An authority's RMP <b>must</b> describe the procedures in place to regularly review it in the future.</p>
<b>Statement</b>
<p>The SFRS Records Management Policy states that one of the ways in which SFRS will develop and implement effective records management is the establishment of an assessment and review programme to ensure that records management policies, procedures, systems and practices remain fit for purpose.</p> <p>The Records Management Officer's annual action plan includes the action to develop a process to review records management systems and ensure they remain fit for purpose, including a full information audit.</p> <p><b>Review of relevant policies, procedures, etc.</b></p> <p>The Plan and all of the policies and procedures provided as evidence are subject to the SFRS corporate document control procedures, including regular review. The document control table on the front page of each policy/procedure gives the date for next review. The standard review period for SFRS policies is two years.</p>

Every new policy and procedure is circulated to key internal stakeholders for consultation, quality controlled and authorised before being issued to all staff. The review of any relevant documents by the Records Management Officer will be reported to and quality controlled by her line manager, the Information Governance Manager. The Records Management Officer is responsible for reviewing the Records Management Policy every two years or as required. The Policy is next due for review in February 2019.

Some policies and procedures given as evidence will be written, quality controlled and authorised by other members of staff, as per their remit. The quality controller is usually a more senior member of staff, e.g. the author's line manager, and the authoriser is usually the relevant member of the Strategic Leadership Team (i.e. the director of the relevant Directorate).

As the Records Management Officer is also responsible for managing the review system for internal controlled documents, she will know when any policies/procedures, etc. have been reviewed and will update the Plan accordingly. All controlled documents come to the RMO for the checking of formatting, version control, etc. before they are issued to staff on the Intranet. The RMO ensures that reviews and amendments to these documents are tracked.

The Records Management Officer's annual action plan also includes the 'milestone' to develop a Corporate Document Framework as part of the 'implementation of structured and systematic approach to the development, review, ratification, dissemination and retention of procedural documents'. While a procedure currently exists and those members of staff who are regularly involved in the production of such documents follow it, it is not formalised in a document. The production of such a Framework will further improve the review mechanism for SFRS controlled documents.

**Review of Records Management Plan:**

Although under the provisions of the PRSA, the Keeper has the authority to ask a public authority to review their Plan after 5 years, the SFRS Plan will be reviewed more regularly, as per the SFRS corporate document control process, as well as the NRS Progress Update Review (PUR) mechanism. The Records Management Officer will review the RMP annually, the initial review being carried out no later than one year after agreement by the Keeper. The Plan will also be reviewed as required, whenever any of the details in the element statements or any of the documents given as evidence are reviewed.

The PUR mechanism invites authorities to complete a template and sent it to the NRS PRSA Assessment Team one year after the date of agreement of its RMP and every year thereafter. The template provides an opportunity for authorities to report on progress against improvements and to comment on any new initiatives, highlight innovations or record changes to existing arrangements.

The Records Management Officer's annual action plan includes the action to 'review the RMP regularly', i.e. annually or when any changes to arrangements are made.

**Appraisal process:**

As the elements of the Plan tie in closely with the work of the Records Management Officer, it will be reviewed as an integral part of her work. This will be formalised through the SFRS appraisal process (see [Element 12](#)) and the completion of annual proformas, setting the RMO's key work objectives and development activities for the coming year.

The key work objectives and other tasks are then set out in the Records Management Officer's individual action plan. These action plans are updated annually for each member of the Information Governance department.

Therefore, all tasks relating to the assessment and review of SFRS records management arrangements will be captured within the Records Management Officer's appraisal proforma and individual action plan. The annual and interim review meetings of the appraisal process, as well as regular one-to-one meetings with the Information Governance Manager, will ensure that progress in assessment and review tasks is regularly monitored.

The Information Governance Manager reports to the Head of Strategic Planning and Performance, who reports to the Director of Strategic Planning, Performance and Communications. Thus, the results of monitoring and review will be reported to the senior manager responsible for records management (see [Element 1](#)), for information and action, as required.

**Internal Audit:**

In 2015, the Internal Audit department carried out an audit review of the 'controls established to manage the risks relating to SFRS' records management'. This review formed part of their planned coverage of risk management, control and governance within SFRS, as agreed with the Accountable Officer and the Audit and Risk Assurance Committee. The Scope, Remit Items and Key Risks are outlined in the Terms of Reference.

The Report gives the Assurance level, as well as the Findings and Recommendations, covering the Key Risks, Key Controls, Summary of Findings, Issues Identified and Recommendations for each Remit Item. The Recommendations give the priority and reason for the recommendation, as well as the management response, action officer and action due date.

The audit covered the work of the Information Governance department and not just the remit of the Records Management Officer. The main recommendations of the audit related to improving governance arrangements by planning the implementation of

policies, procedures and records management systems and processes; ensuring that key roles in respect of information security are in place; and requiring internal scrutiny of responses to requests for information to ensure that SFRS meet statutory requirements.

An action plan has been developed for the work for one of the recommendations of the internal audit – ‘an audit of legacy processes for records management should be undertaken by ... Information Governance [and] ICT, to identify areas of risk in relation to the management and processing of personal data and a contingency plan put in place to manage the risks’. The action plan details the responsible officers and target dates for the tasks involved, e.g. prepare audit documentation, identify contacts, communications, on-site audits.

The Internal Audit department present regular progress reports on their work programme to the Audit and Risk Assurance Committee of the SFRS Board. The minutes of the ARAC are published on the website. There is no rolling pattern of internal audit reviews, as risk based internal auditing is undertaken, in line with Public Sector Internal Audit Standards. The department meet each year with SLT members, the Chief Officer and ARAC Committee members to decide which areas will be audited that year, based on known and emerging risks.

The internal audit review of SFRS records management arrangements ensures that progress in these areas is formally monitored and reported on, thus strengthening the mechanism for the assessment and review of relevant areas.

**Self-assessment:**

Once the Plan has been agreed and as stated in the Records Management Policy, SFRS will establish an assessment and review programme to ensure that records management policies, procedures, systems and practices remain fit for purpose. In order to do this, SFRS will adopt a recognised records management self-assessment tool.

The Records Management Officer has attended a series of three workshops (spread over November 2016 to March 2017) on the Archives and Records Management Services (ARMS) Quality Improvement Tool, developed by the Scottish Council on Archives. The workshops were designed to support both current users of ARMS and those interested in undertaking the full cycle of the self-assessment process for the first time, like SFRS. The Tool is a quality improvement framework, designed to assist Scottish authorities in assessing their own records management performance. As such, it is seen as an appropriate tool for SFRS to use in the assessment and review of its records management arrangements.

In order to continuously improve its records management arrangements, SFRS will take heed of the guidance provided in relevant codes of practice, e.g. the Code of Practice on Records Management under section 61(6) of the Freedom of Information (Scotland) Act 2002. SFRS will also consider the use of relevant standards as a benchmark for best practice, e.g. ISO 15489, the international standard.

#### **Information Governance Group:**

On 13 February 2017, Mark McAteer (see [Element 1](#)) presented a report to the Strategic Leadership Team (SLT) on the Executive Governance Arrangements Review, making recommendations on the nature and operating structure of Executive Management and Senior Management arrangements within SFRS, in order to strengthen decision-making and performance accountability within the Service. One of the recommendations was that two new Executive Management Boards would be formed to supplement existing arrangements, namely a Corporate Assurance Board and Asset Management Liaison Board. The Corporate Assurance Board would provide oversight of various groups, including the Information Governance Group. The group's purpose would be to support and drive the broader information governance agenda and provide SLT and the Board with assurance that effective information governance best practice mechanisms are in place within the organisation. The SLT approved the recommendations of the report, subject to minor amendments.

The approval of the creation of an Information Governance Group demonstrates the commitment of SFRS to developing robust information governance arrangements. It also provides better accountability in the assessment and review of records management arrangements.

**Evidence**

E003	Records Management Policy
E006	Records Management Action Plan
E107	Appraisal Policy and Procedure
E108	Appraisal Policy and Procedure FAQs
E109	Records Management Officer appraisal proforma, 2016/17
E110	Records Management Officer appraisal proforma, 2017/18
E114	Terms of Reference, Audit and Risk Assurance Committee V3.2, 10/03/2017
E115	Internal Audit Proposed Plan 2015/16, presented to ARAC, 04/03/2015
E116	ARAC Minutes showing approval of Internal Audit Proposed Plan 2015/16, 04/03/2015
E117	Internal Audit Report – Records Management 2015/16, issued 24/11/2015
E118	Internal Audit Action Plan, Records Management 2016/7
E119	Internal Audit Progress Report, presented to ARAC, 07/09/2015
E120	Internal Audit Progress Report, presented to ARAC, 08/12/2015
E121	Internal Audit Progress Report, presented to ARAC, 15/03/2016
E122	Internal Audit Annual Report and Assurance 2015/16, presented to ARAC, 22/06/2016
E123	Internal Audit Progress Report, presented to ARAC, 12/10/2016
E124	Internal Audit Progress Report, presented to ARAC, 11/01/2017
E125	Internal Audit Progress Report, presented to ARAC, 29/03/2017
E137	Internal Audit Progress Report, presented to ARAC, 15/06/2017
E112	RMO Attendance at SCA workshops on ARMS Quality Improvement Tool, 10/11/2016, 26/01/2017, 07/03/2017

E126	SLT covering report re Executive Governance Arrangements Review, 13/02/2017
E127	SLT minutes re approval of Executive Governance Arrangements Review, 13/02/2017
<b>Actions</b>	
A13.1	A process will be developed to review records management systems and ensure they remain fit for purpose, including a full information audit.
A13.2	A Corporate Document Framework will be developed as part of the implementation of a structured and systematic approach to the development, review, ratification, dissemination and retention of procedural documents
A13.3	The Records Management Plan will be reviewed annually or when any changes to arrangements are made.
A13.4	This element will be reviewed following any development in the actions above or whenever any of the relevant evidence is reviewed
<b>Guidance</b>	
<a href="https://www.nrscotland.gov.uk/record-keeping/public-records-scotland-act-2011/resources/model-records-management-plan/model-plan-guidance-to-element-13">https://www.nrscotland.gov.uk/record-keeping/public-records-scotland-act-2011/resources/model-records-management-plan/model-plan-guidance-to-element-13</a>	

<b>ELEMENT 14 - SHARED INFORMATION</b>
<b>Requirement</b>
<p>Under certain conditions, information given in confidence may be shared. Most commonly, this relates to personal information but it can also happen with confidential corporate records.</p> <p>The Keeper will expect an authority's RMP to reflect its procedures for sharing information. Authorities who share, or are planning to share, information must provide evidence that they have considered the implications of information sharing on good records management.</p>
<b>Statement</b>
<p>The SFRS Records Management Policy states that one of the ways in which SFRS will develop and implement effective records management is the establishment of appropriate information sharing arrangements to ensure that the sharing of personal data or confidential/sensitive information is carried out appropriately.</p> <p>Government policy places a strong emphasis on the need to share information across organisational and professional boundaries, in order to ensure effective co-ordination and integration of services.</p> <p>SFRS is committed to working in partnership with communities and with others in the public, private and third sectors. It is important that SFRS protect and safeguard person-identifiable information that it shares, in order to comply with the law and to provide assurance to the public. In general terms, the aims of sharing information with partners are:</p>

- To support decision-making and resource allocation
- To improve the consistency and reliability of information, intelligence and data management practices
- To improve service delivery and/or to reduce service demand
- To provide more integrated, intelligence-led local services

The SFRS entry in the ICO's public register of data controllers states that the Service sometimes needs to share personal information we process with the individuals themselves and also with other organisations. The entry lists the types of organisations with whom we may need to share personal information and states that, where this is necessary, the Service will comply with the Data Protection Act. The entry can be found on the ICO website here: <https://ico.org.uk/ESDWebPages/Entry/Z3555625>

SFRS will issue an Information Sharing Policy (currently in draft) and supporting guidance to ensure that information is shared lawfully and ethically; it is shared in a planned and consistent way; it is accurate and fit for purpose; all partner agencies place reasonable and lawful conditions or restrictions on the way information is handled; there is confidence and understanding of information sharing processes and procedures across partner agencies; and appropriate tools, such as secure email, are utilised for classified information sharing.

The Policy informs staff that it is good practice to have an information sharing protocol (ISP) in place which sets out a common set of rules to be adopted by the organisations involved and to review it regularly, particularly where information is to be shared on a large scale or regular basis.

The Policy also refers staff to other associated documents, e.g. the ISP Template and Guidance, the Data Protection Policy, Records Management Policy, Records Retention Schedule and Secure Email Policy.

The SFRS Information Sharing Template and Guidance provides guidance for ISP development using the SASPI framework and for populating the template. The guidance also includes a Sharing of Personal Information ISP Development Checklist.

The guidance makes specific reference to records management and the template has been pre-populated with set text directing staff to their own organisations' policies and procedures regarding records storage and disposal, as well as the processes for any correction of information.

The template also has set text sections for information security and subject access requests, thus assisting SFRS in complying with these requirements. This will also assist SFRS in satisfying [Element 8 Information Security](#) and [Element 9 Data Protection](#) in the Records Management Plan.

SFRS have already adopted the practice of using the SASPI template and guidance to enter into any partnerships where personal data is being shared. The new policy will formalise this process and ensure all staff are aware of the correct procedure to follow.

The Records Management Officer's annual action plan includes the action to develop robust information sharing processes to allow the safe exchange of information with partner agencies in compliance with the Data Protection Act. This sits under the remit of the Information Security Officer, who will work with the Records Management Officer on the relevant records management issues.

The SFRS Information Security Officer oversees SFRS information sharing arrangements, by providing guidance to staff, considering ISPs before they are signed, recording all ISPs and monitoring them for review. All signed ISPs will be made available to staff via the SFRS Intranet.

The Information Security Officer is also gathering information regarding the ISPs which the eight legacy services had in place and is working to ensure that SFRS has all

necessary, appropriate ISPs in place with relevant partner organisations. An example of a current ISP is also provided.

The Information Governance department have hosted a series of data protection awareness seminars throughout Scotland for SFRS staff. These seminars have included presentations on sharing personal data from the Information Commissioner’s Office and on information sharing issues specific to SFRS. Delegates have received copies of the presentations to take away, as well as copies of the ICO’s Access Aware posters, including the ‘Are You Sharing Personal Information Securely?’ poster, tailored for SFRS.

The Information Security Officer and Information Governance Manager have also hosted a series of training sessions for secure email users across the Service. The sessions consisted of a presentation outlining the linked issues of information security, data protection and information sharing and a demonstration of how the secure email system should be used to comply with requirements in these areas. Afterwards, staff were asked for feedback on the sessions and a record kept in the electronic HR system that they have completed this training activity.

The Information Security Officer has also developed an e-learning package, including information sharing, based on the Government’s Protecting Information package, which all staff will have to complete on an ongoing basis, every 3 years. New employees will also sit this assessment as part of their induction.

**Evidence**

E003	Records Management Policy
E081	SFRS ICO Registration Details
E128	Information Sharing Policy (draft)
E129	Information Sharing Protocol Template (draft)
E130	Information Sharing Protocol Guidance (draft)
E131	Information Sharing Protocol Checklist (draft)

E006	Records Management Action Plan
E132	List of current ISPs – TO FOLLOW
E133	Example ISP between SFRS and Haven Sign Factory (Nominal Roll Board Project)
E064	Data Protection Awareness Seminars – ICO presentation
E065	Data Protection Awareness Seminars – SFRS presentation
E066	Data Protection Awareness Seminars – Take Care with Attachments poster
E067	Data Protection Awareness Seminars – Subject Access Request 1 poster
E068	Data Protection Awareness Seminars – Keep Your Work Area Clear poster
E069	Data Protection Awareness Seminars – Subject Access Request 2 poster
E070	Data Protection Awareness Seminars – Don't Just Give It Away poster
E071	Data Protection Awareness Seminars – Subject Access Request 3 poster
E072	Data Protection Awareness Seminars – If In Doubt, Find Out poster
E073	Data Protection Awareness Seminars – Subject Access Request 4 poster
E074	Data Protection Awareness Seminars – Wear Your Pass poster
E075	Data Protection Awareness Seminars – FOI Request poster
E076	Data Protection Awareness Seminars – Aware of Protectively Marking poster
E077	Data Protection Awareness Seminars – Subject Access Request 5 poster
E078	Data Protection Awareness Seminars – Sharing Personal Information poster
E079	Data Protection Awareness Seminars – Subject Access Request 6 poster
E147	Email Invite to Secure Email Training, 12/09/2017
E148	Secure Email Training session agenda, 04/10/2017
E149	Secure Email Training session presentation, 04/10/2017
E150	Email requesting Feedback from Secure Email Training, 06/10/2017
E151	Email requesting Record of Secure Email Training, 17/10/2017
E145	Elearning screenshot – Information Sharing
E146	Elearning screenshot – Assessment
E152	SMT covering report for approval of Elearning module (draft)

<b>Actions</b>	
A14.1	Robust information sharing processes will be developed to allow the safe exchange of information with partner agencies in compliance with the Data Protection Act.
A14.2	This element will be reviewed whenever any of the above evidence is reviewed. The policy and guidance will be reviewed by the Information Security Officer every 2 years or as required.
<b>Guidance</b>	
<a href="https://www.nrscotland.gov.uk/record-keeping/public-records-scotland-act-2011/resources/model-records-management-plan/model-plan-guidance-to-element-14">https://www.nrscotland.gov.uk/record-keeping/public-records-scotland-act-2011/resources/model-records-management-plan/model-plan-guidance-to-element-14</a>	

## APPENDIX A – EVIDENCE SUBMITTED

Below is a list of the evidence submitted in support of each of the elements of the SFRS Records Management Plan. Evidence documents which have been referred to in the Plan but which do not yet exist have been marked as 'TO FOLLOW' and will be added as they become available. Evidence documents which currently only exist in draft form will be replaced by live versions as they become available.

No.	Evidence	Element(s)
E001	Commitment by Mark McAteer, Director of SPPC ( <a href="#">Introduction to RMP</a> )	1
E002	Organisational structure (part), 13/04/2017	1, 2
E003	<a href="#">Records Management Policy</a>	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14
E004	SLT covering report for approval of Records Management Plan, 15/01/2018	1
E005	SLT minutes showing approval of Records Management Plan, 15/01/2018	1
E006	Records Management Action Plan	2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14
E007	Intranet screenshot – Information Governance information available to staff	2, 12
E008	Intranet screenshot – Records Management information available to staff	2, 12
E009	Information Governance department meeting agenda, 22/11/2016	2
E010	SLT covering report for approval of Records Management Policy, 19/11/2014	3

E011	SLT minutes showing approval of Records Management Policy, 19/11/2014	3
E012	Intranet screenshot – News Item re Issue of Records Management Policy, 03/03/2015	3
E013	Intranet screenshot – Records Management Policy available to staff	3
E014	<a href="#">SFRS website – Records Management Policy available to public</a>	3
E015	CFOAS Information Management Forum minutes, 03/02/2005	4
E016	CFOAS Information Management Forum minutes, 02/06/2011	4
E017	Draft File Classification Scheme and Guidance, 19/03/2013	4, 5
E018	File Classification Scheme covering letter to legacy services, 19/03/2013	4
E019	ICT Workstream 16 17, Digital Steering Group update 01/08/2016	4, 6, 11
E020	ICT Priority Workplan 201718, 10/03/2017	4, 6, 11
E021	User Intelligence Group agenda, 20/09/2016	4, 6, 11
E022	User Intelligence Group minutes 14/10/2016	4, 6, 11
E023	User Intelligence Group minutes, 15/11/2016	4, 6, 11
E024	User Intelligence Group minutes, 14/12/2016	4, 6, 11
E025	User Intelligence Group minutes, 07/02/2017	4, 6, 11
E026	User Intelligence Group minutes, 07/04/2017	4, 6, 11
E027	Interim Records Retention Schedule	4, 5, 6, 7
E028	Records Retention Schedule Feedback Form	5
E029	Records Disposal Form (draft)	5, 6, 7
E030	SMT covering report for approval of Records Retention Schedule for consultation, 23/11/2015	5
E031	SMT minutes showing approval of Records Retention Schedule for consultation and approval of Information Security documents for consultation, 23/11/2015	5, 8

E032	Email issuing Records Retention Schedule for consultation, 16/02/2016	5
E033	SMT covering report for approval to issue Records Retention Schedule, 22/03/2017	5
E034	SMT minutes showing approval to issue Records Retention Schedule and approval to issue File Naming Conventions Guidance for consultation, 22/03/2017	5, 11
E035	Intranet screenshot – News Item re Issue of Records Retention Schedule, 13/04/2017	5
E036	Intranet screenshot – Records Retention Schedule available to staff	5
E037	Intranet screenshot – Records Retention Schedule Feedback Form available to staff	5
E038	Email issuing Records Retention Schedule to staff for Strategic Intent project (East Decommissioning), 17/02/2016	5, 6
E039	Email issuing Records Retention Schedule to staff for Strategic Intent project (North Decommissioning), 08/07/2016	5, 6
E040	Records Destruction Arrangements – TO FOLLOW	6
E041	Register of Disposal – TO FOLLOW	6, 7
E042	Certificate of Destruction & Waste Transfer Note, Paper Shredding Services, 14/12/2016	6
E043	Certificate of Collection and Processing of WEEE, Haven Recycling, 10/01/2017	6
E044	Records Transfer Arrangements – TO FOLLOW	7
E045	Email from Paul Carlyle, NRS, to Morag Penny, SFRS, re MoU and guidance documents, 29/07/2015	7
E046	Email from Jean Crawford, NRS, to Morag Penny, SFRS, re Depositor Guidance, 23/10/2015	7
E047	Email from Jean Crawford, NRS to Morag Allan, SFRS, re confirmation of meeting, 18/04/2017	7

E048	Memorandum of Understanding between NRS and SFRS – TO FOLLOW	7
E049	SLT covering report for approval of MoU – TO FOLLOW	7
E050	SLT minutes showing approval of MoU – TO FOLLOW	7
E051	Example transfer certificate/receipt from NRS – TO FOLLOW	7
E052	Information Security Handbook	8
E053	Acceptable Use Policy	8
E054	Network Password Policy	8
E055	Secure Desk Policy	8
E056	Secure Email Policy (draft)	8
E057	Secure Email User Guide (draft)	8
E058	SMT covering report for approval of Acceptable Use Policy for consultation, 23/11/2015	8
E059	SMT covering report for approval of Network Password Policy for consultation, 23/11/2015	8
E060	Intranet screenshot – News Item re Issue of Information Security documents, 26/10/2017	8
E061	Intranet screenshot – Information Security Handbook available to staff	8
E062	SMT covering report for approval of Secure Desk Policy for consultation, 23/11/2015	8
E063	Intranet screenshot – Information Security information available to staff	8
E064	Data Protection Awareness Seminars – ICO presentation	8, 9, 14
E065	Data Protection Awareness Seminars – SFRS presentation	8, 9, 12, 14
E066	Data Protection Awareness Seminars – Take Care with Attachments poster	8, 9, 14
E067	Data Protection Awareness Seminars – Subject Access Request 1 poster	8, 9, 14

E068	Data Protection Awareness Seminars – Keep Your Work Area Clear poster	8, 9, 14
E069	Data Protection Awareness Seminars – Subject Access Request 2 poster	8, 9, 14
E070	Data Protection Awareness Seminars – Don't Just Give It Away poster	8, 9, 14
E071	Data Protection Awareness Seminars – Subject Access Request 3 poster	8, 9, 14
E072	Data Protection Awareness Seminars – If In Doubt, Find Out poster	8, 9, 14
E073	Data Protection Awareness Seminars – Subject Access Request 4 poster	8, 9, 14
E074	Data Protection Awareness Seminars – Wear Your Pass poster	8, 9, 14
E075	Data Protection Awareness Seminars – FOI Request poster	8, 9, 14
E076	Data Protection Awareness Seminars – Aware of Protectively Marking poster	8, 9, 14
E077	Data Protection Awareness Seminars – Subject Access Request 5 poster	8, 9, 14
E078	Data Protection Awareness Seminars – Sharing Personal Information poster	8, 9, 14
E079	Data Protection Awareness Seminars – Subject Access Request 6 poster	8, 9, 14
E080	Elearning screenshot – Menu	8, 9, 14
E081	<a href="#">SFRS ICO Registration Details</a>	9, 14
E082	<a href="#">Code of Conduct</a>	8, 9
E083	Acknowledgement of Receipt of Employee Code of Conduct	8, 9
E084	Intranet screenshot – News Item re SFRS Code of Conduct, 17/12/2014	8, 9
E085	Intranet screenshot – News Item re SFRS Code of Conduct now effective, 02/02/2015	8, 9

E086	<a href="#">Data Protection Policy</a>	9
E087	Processing Personal Data Procedure	9
E088	<a href="#">Subject Access Requests Procedure</a>	9
E089	Intranet screenshot – Data Protection information available to staff	9
E090	Elearning screenshot – Data Protection module	9
E091	<a href="#">SFRS website – Data Protection information available to public</a>	9
E092	<a href="#">Privacy Statement</a>	9
E093	<a href="#">Subject Access Public Guidance</a>	9
E094	<a href="#">Subject Access Form</a>	9
E095	<a href="#">Access to Information Policy</a>	9
E096	Business Continuity Policy and Guidance (draft)	10
E097	SLT report for approval of Business Continuity Policy – TO FOLLOW	10
E098	SLT minutes showing approval of Business Continuity Policy – TO FOLLOW	10
E099	Intranet screenshot – Business Continuity documents available to staff – TO FOLLOW	10
E100	File Naming Conventions Guidance	11
E101	SMT report re File Naming Conventions Guidance for approval for consultation, 22/03/2017	11
E102	Intranet screenshot – News Item re Issue of File Naming Conventions Guidance, 21/09/2017	11
E103	Intranet screenshot – File Naming Conventions Guidance available to staff	11
E104	Information Governance Action Plan 2017-2020 – TO FOLLOW	12
E105	<a href="#">Annual Operating Plan 2015-2016</a>	12
E106	Intranet screenshot – Appraisal Process information available to staff	12
E107	<a href="#">Appraisal Policy and Procedure</a>	12, 13

E108	Appraisal Policy and Procedure FAQs	12, 13
E109	Records Management Officer appraisal proforma, 2016/17	12, 13
E110	Records Management Officer appraisal proforma, 2017/18	12, 13
E111	RMO Attendance at IG Scotland PRSA masterclass, 04/02/2014	12
E112	RMO Attendance at SCA workshops on ARMS Quality Improvement Tool, 10/11/2016, 26/01/2017, 07/03/2017	12, 13
E113	Elearning screenshot – Records Management module – TO FOLLOW	12
E114	<a href="#">Terms of Reference, Audit and Risk Assurance Committee</a>	13
E115	<a href="#">Internal Audit Proposed Plan 2015/16, presented to ARAC, 04/03/2015</a>	13
E116	<a href="#">ARAC Minutes showing approval of Internal Audit Proposed Plan 2015/16, 04/03/2015</a>	13
E117	Internal Audit Report – Records Management 2015/16, issued 24/11/2015	13
E118	Internal Audit Action Plan – Records Management 2016/17	13
E119	<a href="#">Internal Audit Progress Report, presented to ARAC, 07/09/2015</a>	13
E120	<a href="#">Internal Audit Progress Report, presented to ARAC, 08/12/2015</a>	13
E121	<a href="#">Internal Audit Progress Report, presented to ARAC, 15/03/2016</a>	13
E122	<a href="#">Internal Audit Annual Report and Assurance 2015/16, presented to ARAC, 22/06/2016</a>	13
E123	<a href="#">Internal Audit Progress Report, presented to ARAC, 12/10/2016</a>	13
E124	<a href="#">Internal Audit Progress Report, presented to ARAC, 11/01/2017</a>	13
E125	<a href="#">Internal Audit Progress Report, presented to ARAC, 29/03/2017</a>	13
E126	SLT covering report re Executive Governance Arrangements Review, 13/02/2017	13
E127	SLT minutes re approval of Executive Governance Arrangements Review, 13/02/2017	13
E128	Information Sharing Policy (draft)	14
E129	Information Sharing Protocol Template (draft)	14

E130	Information Sharing Protocol Guidance (draft)	14
E131	Information Sharing Protocol Checklist (draft)	14
E132	List of current Information Sharing Protocols – TO FOLLOW	14
E133	Example ISP between SFRS and Haven Sign Factory (Nominal Roll Board Project)	14
E134	SharePoint meeting agenda, 26/03/2014	4, 6, 11
E135	Example completed Records Retention Schedule feedback form	5
E136	Email issuing File Naming Conventions Guidance for consultation, 06/04/2017	11
E137	<a href="#">Internal Audit Progress Report, presented to ARAC, 15/06/2017</a>	13
E138	Email issuing File Naming Conventions Guidance to Heads of Function, 22/09/2017	11
E139	Iron Mountain Agreement with Strathclyde Fire & Rescue, 21/01/2008	11
E140	Iron Mountain Invoice to SFRS, 31/08/2017	11
E141	Tayside Fire & Rescue Lease of Dundee City Council Storage, 08/07/2008	11
E142	Email issuing Information Security documents for consultation, 26/09/2017	8
E143	Elearning screenshot – Information Security module – Secure Email	8
E144	Elearning screenshot – Information Security module – Government Security Classifications	8
E145	Elearning screenshot – Information Security module – Information Sharing	14
E146	Elearning screenshot – Assessment	8, 9, 14
E147	Email Invite to Secure Email Training, 12/09/2017	8, 9, 14
E148	Secure Email Training session agenda, 04/10/2017	8, 9, 14
E149	Secure Email Training session presentation, 04/10/2017	8, 9, 14

NOT PROTECTIVELY MARKED

E150	Email requesting Feedback from Secure Email Training, 06/10/2017	8, 9, 14
E151	Email requesting Record of Secure Email Training, 17/10/2017	8, 9, 14
E152	SMT covering report for approval of Elearning module (draft)	8, 9, 14
E153	Intranet screenshot – Acceptable Use Policy available to staff	8
E154	Intranet screenshot – Network Password Policy available to staff	8
E155	Intranet screenshot – Secure Desk Policy available to staff	8
E156	Email screenshot – Backup Retention Periods	6
E157	Intranet screenshot – News Item re Issue of Records Management Plan, 03/05/2018	1
E158	Intranet screenshot – Records Management Plan available to staff	1
E159	<a href="#">Internal Audit Progress Report, presented to ARAC, 05/10/2017</a>	13
E160	<a href="#">Internal Audit Progress Report, presented to ARAC, 07/12/2017</a>	13
E161	<a href="#">Internal Audit Progress Report, presented to ARAC, 28/03/2018</a>	13
E162	SFRS website – Records Management Plan available to public	1

## APPENDIX B – ACTIONS

Below is a summary of the actions for each of the elements of the SFRS Records Management Plan.

<b><u>ELEMENT 1 – SENIOR MANAGEMENT RESPONSIBILITY</u></b>	
A1.1	Covering report to SLT and Minutes will be added showing approval of RMP
A1.2	This element will be reviewed whenever there are any changes to relevant personnel or organisational structure
<b><u>ELEMENT 2 – RECORDS MANAGER RESPONSIBILITY</u></b>	
A2.1	This element will be reviewed whenever there are any changes to relevant personnel or organisational structure
<b><u>ELEMENT 3 – RECORDS MANAGEMENT POLICY STATEMENT</u></b>	
A3.1	The Records Management Policy will be reviewed every 2 years or as required
A3.2	This element will be reviewed whenever there are any changes to relevant evidence
<b><u>ELEMENT 4 – BUSINESS CLASSIFICATION</u></b>	
A4.1	A SFRS business classification scheme will be developed and implemented to reflect the functions, activities and transactions of the Service
A4.2	This element will be reviewed whenever there are any changes to the actions required or the relevant evidence
<b><u>ELEMENT 5 – RETENTION SCHEDULES</u></b>	
A5.1	The full SFRS Records Retention Schedule will be developed following feedback on the interim schedule
A5.2	This element will be reviewed whenever there are any changes to the actions required or the relevant evidence
<b><u>ELEMENT 6 – DESTRUCTION ARRANGEMENTS</u></b>	
A6.1	SFRS-wide records destruction arrangements will be developed and implemented
A6.2	This element will be reviewed whenever there are any changes to the actions required or the relevant evidence

<b><u>ELEMENT 7 – ARCHIVING AND TRANSFER ARRANGEMENTS</u></b>	
A7.1	A Memorandum of Understanding between SFRS and NRS will be set up to implement a mechanism to transfer records of historical value
A7.2	This element will be reviewed whenever there are any changes to the actions required or the relevant evidence
<b><u>ELEMENT 8 – INFORMATION SECURITY</u></b>	
A8.1	Robust information security measures will be developed to protect records.
A8.2	This element will be reviewed following any development in the actions above or whenever any of the relevant evidence is reviewed
<b><u>ELEMENT 9 – DATA PROTECTION</u></b>	
A9.1	Appropriate processes will be developed to ensure compliance with the Data Protection Act 1998.
A9.2	This element will be reviewed following any development in the actions above or whenever any of the relevant evidence is reviewed
<b><u>ELEMENT 10 – BUSINESS CONTINUITY AND VITAL RECORDS</u></b>	
A10.1	Arrangements in support of records vital to business continuity will be developed
A10.2	This element will be reviewed following any development in the actions above or whenever any of the relevant evidence is reviewed
<b><u>ELEMENT 11 – AUDIT TRAIL</u></b>	
A11.1	An audit trail mechanism will be developed that records the movement of records, in order to know where records are at any given time and to have robust version control
A11.2	A Corporate Document Framework will be developed as part of the implementation of a structured and systematic approach to the development, review, ratification, dissemination and retention of procedural documents
A11.3	This element will be reviewed following any development in the actions above or whenever any of the relevant evidence is reviewed

<b><u>ELEMENT 12 – COMPETENCY FRAMEWORK FOR RM STAFF</u></b>	
A12.1	A competency framework of the knowledge and skills required for records management staff, identifying training needs and assessing performance, will be maintained and regularly reviewed through the SFRS Appraisal process
A12.2	The Records Management Officer’s CPD will be maintained by reading professional journals, attending seminars/conferences, etc.
A12.3	This element will be reviewed following any development in the actions above or whenever any of the relevant evidence is reviewed
<b><u>ELEMENT 13 – ASSESSMENT AND REVIEW</u></b>	
A13.1	A process will be developed to review records management systems and ensure they remain fit for purpose, including a full information audit
A13.2	A Corporate Document Framework will be developed as part of the implementation of a structured and systematic approach to the development, review, ratification, dissemination and retention of procedural documents
A13.3	The Records Management Plan will be reviewed regularly, i.e. annually or when any changes to arrangements are made
A13.4	This element will be reviewed following any development in the actions above or whenever any of the relevant evidence is reviewed
<b><u>ELEMENT 14 – SHARED INFORMATION</u></b>	
A14.1	Robust information sharing processes will be developed to allow the safe exchange of information with partner agencies in compliance with the Data Protection Act.
A14.2	This element will be reviewed whenever any of the above evidence is reviewed. The policy and guidance will be reviewed by the Information Security Officer every 2 years or as required.