RECORDS MANAGEMENT POLICY

Version	Date	Owner	Summary of Changes
V1.0	13/05/2013	Information Governance Lead	• N/A
V1.1	20/02/2014		• Addition of Document and Status Control tables and reference to Communication Act 2003 at 6.1, as well as minor grammatical changes throughout.
V1.2	06/06/2014		• Removal of sections 6 and 7 as they are in the overarching Information Security Policy. Additions to 4.1. Review period extended from 6 months to 2 years.
V1.3	19/08/2014		• Policy reviewed by Audit and Risk Management Committee (ARMC) – no changes recommended.
V2.0	26/08/2014		• Final policy approved by CHS Board.
V2.1	25/03/2015		• Minor amendments to reflect revised job titles at CHS.
V3.0	31/03/2015		• Final Policy approved by SMT.
V3.1	03/04/2017		• Minor amendment's to terminology with a comprehensive review to be carried out prior to GDPR implementation in May 2018.
V3.2	11/04/2017		• Minor amendments in line with GDPR implementation.
V4.0	13/04/2018		• Final version signed off by SIRO.
V4.1	21/02/2022	Information Governance & Data Protection Officer (IG&DPO)	• Minor amendments to roles & responsibilities and to incorporate GDPR.
V5.0	28/02/2022		• Final policy signed off by SIRO

Approvals	Approved by SIRO 28/02/2022

1. Introduction

1.1 CHS recognises that the effective management of its records, regardless of format, is essential in order to support panel and AST members, Clerks to the ASTs, CHS National team staff and Board members; to comply with legal, statutory and regulatory obligations; to support its functions; and to demonstrate transparency and accountability for all actions. CHS' records are a vital information asset and a valuable resource for the organisation and must be managed effectively from the point of their creation until their disposal.

1.2 The implementation of effective records management systems and practices is at the heart of the Children's Hearings System (the System). In the spirit of the Children's Hearings Scotland Act 2011 (2011 Act) it is essential that we look to remove any inconsistencies in the management of information and standardise the way in which the System operates. Central to this is the way in which the organisation accesses, manages, shares and maintains information.

2. Purpose and scope

2.1 The purpose of this policy is to demonstrate CHS' commitment to best practice record keeping, to highlight the importance of managing records effectively within the organisation, to outline key aims and objectives for CHS in relation to its record keeping, to identify roles and responsibilities for Records Management (RM) and to act as a mandate for the support and delivery of record keeping policies and procedures across the organisation.

2.2 This policy relates to all CHS National team staff and Board members, panel and Area Support Team (AST) members, and Clerks to the ASTs. It applies to all records regardless of format, including paper, electronic, audio and visual.

2.3 The Public Records (Scotland) Act 2011 (PRSA) places an obligation on named authorities in Scotland to produce a Records Management Plan (RMP) which sets out their arrangements for the effective management of all records. The creation of a Records Management Policy statement is a mandatory element of the plan, and is necessary in order to identify the procedures to be followed in managing CHS' records.

3. What is Records Management (RM)

3.1 RM can be defined as the process whereby an organisation manages its records, whether created internally or externally and in any format, from their creation or receipt, through to their disposal or permanent preservation. It is about placing controls around each stage of a record's lifecycle, at the point of creation, during their maintenance and use, at regular review intervals and at ultimate disposal. By placing such controls around the lifecycle of a record, we can ensure they demonstrate the key attributes of authenticity, reliability, integrity and accessibility.

3.2 Information and records are a valuable corporate asset without which we would be unable to carry out our functions; support panel and AST members and Clerks in delivering improvements across the System; realise the core values[1] of CHS; and ensure legislative compliance.

3.3 The implementation of key RM systems and processes across CHS will result in a number of benefits to the organisation. For CHS National team staff and Board members it will:

- increase organisational efficiency through improved access to vital information
- ensure that CHS retains physical and intellectual control of all information produced and held by the organisation and its members

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[1] Please see www.chscotland.gov.uk for further information.

- lead to the implementation of secure access protocols as well as the ability to monitor and record audit trail data relating to access and editing of information
- demonstrate consistency in legal ownership and liability through the use of consistent standards and procedures
- ensure that standard core data and document types are produced from which CHS can conduct research and analysis and performance measurement
- improve information sharing and the provision of quick and easy access to the right information at the right time
- demonstrate transparency and accountability for all actions
- ensure that the corporate memory of CHS is maintained
- mitigate risk through evidence of compliance with all legal and statutory obligations, including responding to Freedom of Information (Scotland) Act requests within 20 working days and Data Protection Subject Access Requests within one calendar month

3.4   For ASTs, panel members and Clerks it will:

- improve access to information and ensure that vital information in support of the System can be found quickly and easily
- ensure the security of information at all times
- reduce duplication
- help members share information effectively with one another
- improve working environments through the reduction of paper being retained
- support AST and panel members in their roles enabling them to focus their valuable time on operating the System

4.   Policy statement

4.1   CHS is committed to maintaining authentic, reliable and useable records, which are capable of supporting our functions and activities and meeting our statutory obligations under the 2011 Act. CHS will achieve this through the implementation of robust and comprehensive records management policies and procedures. This includes, but is not limited to:

- a Business Classification Scheme to reflect CHS' functions, activities and transactions
- a Retention and Disposal Schedule to identify all records created and held, the minimum period they must be retained, legislative or statutory obligations which govern their retention, recommended disposal procedure, vital records status, information asset owner and security classification
- procedures to outline how to dispose of information that is not subject to the automated disposal rules within CSAS
- archive transfer arrangements to highlight the correct procedures to follow when depositing records of long term historical value with the National Records of Scotland (NRS) for permanent preservation
- an Information Security Policy to identify the procedures in place to protect records and systems from unauthorised access, use, disclosure, disruption, modification, or destruction

- a Data Protection Policy to set out CHS' commitment to compliance with the General Data Protection Regulation (GDPR) 2018 and Data Protection Act 2018, and provide supporting procedures and practical guidance when handling personal data
- a Business Continuity Plan and Vital Records Strategy, setting out arrangements to prepare for and respond to an emergency as well as strategies to ensure that the vital records held by CHS remain accessible over time
- Information Sharing Protocols and Data Access Agreements to identify clear purposes for information sharing, controls in place to manage and facilitate the sharing and the roles and responsibilities of partners
- document naming guidelines to ensure consistency in the naming and referencing of information, as well as the application of version control
- an Acceptable Use Policy to set out the roles and responsibilities of staff, Board members, panel and AST members, and Clerks in using CHS' information systems
- information security incident reporting and response mechanisms to outline how to report an incident and what CHS will do in the event of an incident

5.   Roles and responsibilities

5.1   CHS National team staff and Board members, panel and AST members, and Clerks to the AST have a responsibility to manage records effectively, through the recording of all decisions and actions made; maintaining all records so that they can be easily retrieved; retaining all records in line with the retention and disposal guidance; highlighting information security incidents at the earliest opportunity; and adhering to relevant information governance policies and procedures, including this policy.

5.2   The Senior Responsible Owner for RM is the Depute Chief Executive. With the support of the Information Governance & Data Protection Officer, they have responsibility for ensuring compliance with this policy.

5.3   The Senior Management Team is responsible for approving a corporate approach to the management of records as defined within this policy; promoting a culture of excellent recordkeeping principles and practices in order to improve efficiency; and supporting RM through a long-term commitment and provision of resources.

5.4   CHS' Information Governance & Data Protection Officer and Information Governance Records Officer are responsible for ensuring that RM practices and procedures are established in line with all legal obligations and professional standards; providing advice and guidance; defining all training; and overseeing the management, retention, security and accessibility of all information held by CHS.

6.   Training

6.1   Information governance training will be provided to all panel and AST members, Clerks, CHS National team staff and Board members in order to highlight and increase awareness of their responsibilities in line with Data Protection, Freedom of Information and RM. Furthermore, core competencies and key knowledge and skills required by each role in relation to RM will be clearly defined in order to ensure that staff and volunteers are aware of their information

governance responsibilities and feel confident in the handling and management of information in respect of their roles.

7.   Monitoring and review

7.1   Compliance with this policy and related standards and guidance will be monitored by the Information Governance & Data Protection Officer in consultation with Area Support Teams and local authorities. Regular practice and compliance reports will be submitted to the Audit and Risk Management Committee and Senior Management Team and updates will be disseminated to panel and AST members via the online portal.

7.2   This policy will be reviewed at least every two years in order to take account of any new or changed legislation, regulations or business practices.

Document Control

Title	Records Management Policy
Author	Danielle Metcalfe
Approved by	SIRO
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Review frequency	Every two years
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