



Glasgow City Council, Assessor & Electoral Registration Officer for the
City of Glasgow, & City of Glasgow Licensing Board

Records Management Plan

November 2013

Document Control

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INTRODUCTION

This is the Records Management Plan for Glasgow City Council, Assessor & Electoral Registration Officer for the City of Glasgow, and the City of Glasgow Licensing Board. It has been prepared in compliance with the requirements of the Public Records (Scotland) Act 2011. In the interests of making the document more readable, the Plan refers throughout to the council. This should be taken as including or meaning a reference to the associated bodies whenever appropriate.

Glasgow City Council, Assessor & Electoral Registration Officer for the City of Glasgow, and the City of Glasgow Licensing Board take their responsibilities for records management very seriously. We have been entrusted with the personal data of hundreds of thousands of the people of Glasgow; with information relating to the expenditure of around £2 billion of public money each year; with the records of the activities of the council in its various roles as education authority, social work authority, planning authority, roads authority and the many other statutory functions which we perform for the people of Glasgow. Our historical records and archives inform the historians of today and will provide a rich supply of material for the historians of the future. This is a heavy responsibility and in recognition of the importance of this information, we have included information as one of our valued assets in the council's new Corporate Asset Management Plan – information is an asset to be protected, managed and where appropriate exploited like any other valuable asset we are entrusted with.

The council expects that this Records Management Plan will provide a firm foundation from which we can make better use of this information – making sure that our officers and elected members have the right information to hand to support their activities and decisions; that information is freely available when required or only available to those who need it if that information is personal or sensitive; that it is accurate, reliable and up to date; and that we do not waste valuable resources storing information which is no longer required, is superseded or is duplicated elsewhere. All this must be done against our obligations to safeguard the historical and archival memory of the City. We are fortunate in this regard in that we have access to the expertise provided by the Glasgow Life City Archives & Records Management function.

The Plan also recognises that we are on a journey – many of the elements within the plan describe the future developments by which we hope to improve the various aspects of our records management policies and procedures. Central to many of these improvements is our deployment over the next two years of an Electronic Document and Records Management System (EDRMS) but the authors of the Plan have been careful to ensure that EDRMS is seen as a tool towards achieving better records management and its deployment is not an end in itself.

I commend this plan to the Keeper of the Records of Scotland and the people of Glasgow.

Annemarie O'Donnell
Executive Director Corporate Services

ELEMENT 1: SENIOR MANAGEMENT RESPONSIBILITY

Introduction	A mandatory element of the Public Records (Scotland) Act 2011, Element 1: Senior management responsibility is the single, most important piece of evidence to be submitted as part of Glasgow City Council, Assessor & Electoral Registration Officer for the City of Glasgow and the City of Glasgow Licensing Board's Records Management Plan. This element must identify the person at senior level who has overall strategic responsibility for records management within the organisation.
Statement of Compliance	The Senior Responsible Officer for Records Management within Glasgow City Council is Annemarie O'Donnell, Executive Director, Corporate Services.
Evidence of Compliance	<p>Primary evidence to be submitted in support of Element 1 includes:</p> <ul style="list-style-type: none"> • Item 001 Statement of Responsibility for Records Management <p>Supporting evidence to be submitted includes:</p> <ul style="list-style-type: none"> • Item 003 Report to ECMT March 2013 – Records Management & Records Retention
Future Developments	There are no planned future developments in respect of Element 1. However, if the Senior Responsible Officer for records management were to change, policies and procedures would need to be examined in the light of these changes.
Assessment and Review	This element will be reviewed as soon as there any changes in personnel.
Responsible Officer(s)	Annemarie O'Donnell, Executive Director, Corporate Services.

ELEMENT 2: RECORDS MANAGER RESPONSIBILITY

<p>Introduction</p>	<p>A mandatory element of the Public Records (Scotland) Act 2011, Element 2: Records manager responsibility must identify the individual within the organisation, answerable to senior management, to have operational responsibility for records management within the organisation.</p>
<p>Statement of Compliance</p>	<p>The council recognises that in order to ensure that information is valid, held securely and adds value to the business, effective governance needs to be in place to manage it. Governance is more than the definition of authority and responsibilities. It also refers to all the rules and procedures, guidelines and conventions, which shape the roles, responsibilities, relationships, behaviours and decisions carried out within or on behalf of the organisation.</p> <p>Information governance balances what has to be done to comply with legislation and corporate responsibility, with what we want to do to achieve our organisational objectives and ambitions.</p> <p>Governance falls into two forms:</p> <ul style="list-style-type: none"> • The organisation and structures that allow and support control. • The processes and procedures that implementation of that control requires. <p>This document within the evidence for this Element entitled ‘Glasgow City Council Information Management Governance’ describes the organisation and structures that will allow and support the council in approvals, advice and operational aspects of governance for all forms of information. Other sections of the Records Management Plan describe the processes and procedures used by these structures.</p> <p>The roles and responsibilities fall into 3 natural categories:</p> <ul style="list-style-type: none"> • Approval Roles: where decision making or oversight is the main purpose. • Advisory Roles: where there is a representational or functional aspect and where the main function is to advise and/or promote information management. The main advisory function is provided by Glasgow Life City Archives & Records Management section. • Operational Roles: where the main function is to implement, manage, report or develop information management. <p>Operational responsibility for records management sits with Dr. Kenneth Meechan, Asset Governance Manager.</p>
<p>Evidence of Compliance</p>	<p>Primary evidence to be submitted in support of Element 2 includes:</p> <ul style="list-style-type: none"> • Item 004 Asset Governance Manager Job Description • Item 005 Asset Governance Manager Person Specification • Item 006 Asset Governance Manager Role Profile

	<ul style="list-style-type: none"> • Item 007 Glasgow City Council Information Management Governance guide • Item 008 Glasgow City Council Records Management Handbook <p>Supporting evidence:</p> <ul style="list-style-type: none"> • Item 002 Glasgow City Council Records Management Plan Action Plan
Future Developments	In terms of establishing the governance structure for information management, work is ongoing to embed the roles described. In addition, work is ongoing to identify Record Series Owners and provide training on the expectations that this role carries.
Assessment and Review	This element will be reviewed in line with any required upstream or downstream changes in governance structure.
Responsible Officer(s)	Dr. Kenneth Meechan, Asset Governance Manager.

ELEMENT 3: RECORDS MANAGEMENT POLICY STATEMENT

<p>Introduction</p>	<p>A mandatory element of the Public Records (Scotland) Act 2011, Element 3: Records management policy statement must demonstrate the importance of managing records within the organisation and serve as a mandate for the activities of the records manager. It is necessary in order to provide an overarching statement of the organisation's priorities and intentions in relation to recordkeeping, and deliver a supporting framework and mandate for the development and implementation of a RM culture.</p>
<p>Statement of Compliance</p>	<p>In March 2013, the council's Asset Governance Manager presented a paper to the Extended Council Management Team which set out the vision, policy and proposals for embedding Records Management across the organisation. These were approved. The remainder of this section sets out what these are.</p> <p>The council recognises the legal, strategic and operational importance of its information, and is adopting a common approach to Information Management through the creation of an Information Management Strategy that establishes "Information as an Asset" and which clearly articulates the council's vision on how information should be managed.</p> <p>The objectives of the Strategy are to provide the strategic rationale, the policy foundation and the operational route-map to allow the council to properly manage its information holdings to ensure that as a public body it is:</p> <ul style="list-style-type: none"> • Compliant with legal requirements in its use of information • Efficient in its management of information with regards to costs and resources • Effective in its use of information, maximising the benefits to the council and its customers <p>The scope of the Information Management Strategy extends to all information that the council creates or uses in its daily business, in all forms – electronic, physical documents and records, email, texts, databases, from whatever source, created by council staff or received from 3rd parties.</p> <p>The vision for the Information Management Strategy is that in future council staff will be information literate, gaining the greatest possible benefit for our customers and the services that the council provides, from the information that they create and use.</p> <p>Information will:</p> <ul style="list-style-type: none"> • Be compliant with all relevant legislation and be securely held • Be available to staff at the point of need • Be accessed via a filing structure or data architecture linked to records management policies • Be based on the principle of "create once – use often" with a unified information architecture and records & document

	<p>governance</p> <ul style="list-style-type: none"> • Be used in a collaborative environment where information can be shared across service boundaries based on customer need and where information follows the user to support service delivery <p>To achieve this vision the council will adopt ten key Information Management Principles (one of which is specifically about Records Management), which translate into ten Information Management Mandates, providing the governance foundation for the handling of all council information, and applicable to all staff. These principles and associated mandates are described in the evidence associated with this Element of the Plan.</p> <p>In support of Mandate 10 - Records Management, the council has agreed a Record Management Policy which is the authority for record-keeping within Glasgow City Council and its related organisations. The Policy recognises that records are a major component of its corporate memory, support on-going operations, and provide valuable evidence of business activities over time.</p> <p>The Policy commits the council to establishing and maintaining record-keeping practices that meet its business needs, accountability requirements and stakeholder expectations. It provides a framework for the creation, maintenance, storage and disposal of public records within Glasgow City Council, and its related organisations.</p> <p>The framework of the Records Management Policy is in relation to:</p> <ul style="list-style-type: none"> • maintaining record quality • capture and control of records • storing and handling of records • access to records • audit trail - tracking of records • disposal, deletion or destruction of records <p>The Records Management Policy is supported by a number of other policies, frameworks, guidelines, which form part of Glasgow City council's evidence of compliance with the Public Records (Scotland) Act 2011.</p>
<p>Evidence of Compliance</p>	<p>Primary evidence to be submitted in support of Element 3 includes:</p> <ul style="list-style-type: none"> • Item 009, 009a, 009b, 009c Glasgow City Council Information Management Strategy • Item 010 GCC Guide to the Information Management Strategy & Information Mandates • Item 011 GCC Information Management Mandates • Item 003 Report to ECMT re. Records Management March 2013 • Item 012 GCC Records Management Policy • Item 008 Glasgow City Council Records Management Handbook • Item 013 Managers Briefing No.1 Introduction to new Information Management Strategy

	<ul style="list-style-type: none"> • Item 014 Managers Briefing No. 2 Information Management Strategy – Principles, Records & Responsibilities • Item 015 Factsheet 1 – Information Management Strategy: Summary of the Mandates • Item 016 Glasgow City Council Corporate Asset Management Plan <p>Supporting evidence:</p> <ul style="list-style-type: none"> • Item 002 Glasgow City Council Records Management Plan Action Plan
<p>Future Developments</p>	<p>Implementation of the Information Management Mandates, and specifically the Records Management Policy, will progress in line with the roll-out of the council's Information Management Strategy.</p> <p>The council will develop a Digital Continuity Strategy which will apply to all public records in digital formats, irrespective of whether the record is 'born digital' or is the output of a digitisation process. The Digital Continuity Strategy will address issues relating to application-specific business systems used by services.</p>
<p>Assessment and Review</p>	<p>The Information Management Strategy, Mandates and Records Management Policy will be reviewed annually by the Asset Governance Manager.</p>
<p>Responsible Officer(s)</p>	<p>Dr. Kenneth Meehan, Asset Governance Manager</p>

ELEMENT 4: BUSINESS CLASSIFICATION

<p>Introduction</p>	<p>The Keeper expects an organisation to carry out a comprehensive assessment of its core business functions and activities, and represent these within a business classification scheme (BCS). It is expected that Element 4 should confirm that the organisation has developed or is in the process of developing a BCS.</p>
<p>Statement of Compliance</p>	<p>Glasgow City Council recognises the importance and benefits of organising its information in such a way that facilitates customer service, business efficiency and information management.</p> <p>In organising its information through classification, the council is able to introduce the necessary structure to improve access, storage and management of it, and therefore not only realise practical benefits but also make it easier to comply with the council's Records Management mandates.</p> <p>The introduction of EDRMS to Glasgow City Council has been the catalyst for the development and deployment of a Business Classification Scheme , which has informed the development of the Council File Plan which sits at the heart of the EDRMS.</p> <p>The council's Business Classification Scheme was developed by the council's Information Management Strategy Team. The resulting strategy was approved by the council in January 2012 along with proposals to prepare the initial programme of work in pursuit of the strategy's objectives.</p> <p>The IMS Team saw as priority activities the linked pieces of work which would see the identification of the council's Record Series, the development of a Business Classification Scheme and roll-out of the council's new Livelink EDRMS system.</p> <p>The Local Government Classification System and the Scottish Services List were reviewed along with the Scottish Council on Archives Model Retention Schedules and the council's List of Record Series, and eventually a Business Classification Scheme was agreed for Glasgow City Council, which encompassed the council's activities but which also took into account best practice in terms of File Plan design.</p> <p>The Business Classification Scheme and resulting Council File Plan are based on 9 themes:</p> <ul style="list-style-type: none"> • Managing the Council • Law & Regulation • Social Care • Education & Learning • City Development & Regeneration • Environment • Traffic & Transport • Managing Assets • Community Life & Leisure

	Ownership and management of the Business Classification Scheme and Council File Plan are the responsibility of the Information Management Team which is part of the Corporate Governance section which sits in Corporate Services.
Evidence of Compliance	<p>Primary evidence to be submitted in support of Element 4 includes:</p> <ul style="list-style-type: none"> • Item 017 GCC Business Classification Scheme • Item 008 Glasgow City Council Records Management Handbook <p>Supporting evidence:</p> <ul style="list-style-type: none"> • Item 002 Glasgow City Council Records Management Plan Action Plan
Future Developments	<p>The Council File Plan flows from the Business Classification Scheme and progressively the council will migrate as much as is practical of its unstructured electronic information and unstructured non-electronic information into this document management repository over the coming years.</p> <p>However, there is also an opportunity to utilise the Business Classification Scheme and Council File Plan within the EDRMS as an information index used to signpost users to other information storage locations whether electronic or non-electronic. This will progressively be the case.</p>
Assessment and Review	Ongoing review and management of the Business Classification Scheme and Council File Plan will be led by the Council Governance team working with the Service/ALEO Information Managers Forum which is chaired by the Asset Governance Manager. The BCS & File Plan Management is now a standing item on the agenda of this forum.
Responsible Officer(s)	Dr Kenneth Meechan, Asset Governance Manager.

ELEMENT 5: RETENTION SCHEDULES

<p>Introduction</p>	<p>Element 5: Retention schedules must demonstrate the existence of and adherence to corporate records retention procedures. These procedures must show that the organisation routinely disposes of information, whether this is destruction or transfer to an archive for permanent preservation. A retention and disposal schedule which sets out recommended retention periods for records created and held by an organisation, is essential for ensuring that the organisation's records are not retained longer than necessary (in line with legal, statutory and regulatory obligations), storage costs are minimised (through the timely destruction of business information), and records deemed worthy of permanent preservation are identified and transferred to an archive at the earliest opportunity.</p>
<p>Statement of Compliance</p>	<p>Glasgow City Council recognises that there is a requirement to develop, implement, operate and monitor compliance with, a council-wide Records Retention and Disposal Schedule which covers all of the council's records series. This Schedule should draw together into a single reference document all existing statutory, regulatory and best practice retention and disposal arrangements, and provide instruction for other records series where previously no such instruction has existed.</p> <p>To this end, the council has:</p> <ul style="list-style-type: none"> • brought together council-wide and local retention and disposal schedules • developed instructions for records series previously not subject to a records management regime, and • consolidated these in a single document. <p>The Council recognises that this will:</p> <ul style="list-style-type: none"> • increase awareness and promotion of our records management obligations and the practices that all of our staff will be required to adopt. • prevent build-up of paper and electronic information that does not require to be kept. • assist us in identifying records which should be preserved as part of the council's archives. • prevent the premature destruction of records that need to be retained for a specified period to satisfy legal, financial and other requirements of public administration. • provide consistency for the destruction of those records not required permanently after specified periods. <p>The culmination of this exercise is the Records Retention and Disposal Schedule which can be viewed in the Evidence section, and which was signed off in August 2013.</p>
<p>Evidence of Compliance</p>	<p>Primary evidence to be submitted in support of Element 5 includes:</p> <ul style="list-style-type: none"> • Item 018 Glasgow City Council Records Retention and Disposal Schedule

	<ul style="list-style-type: none"> • Item 008 Glasgow City Council Records Management Handbook <p>Supporting evidence to be submitted includes:</p> <ul style="list-style-type: none"> • Item 019 Glasgow City Council – Development of the Council Records Retention & Disposal Schedule • Item 020 Managers Briefing No. 3 – Information Management Strategy : Managing Information • Item 021 Factsheet 2 – Information Management Strategy : Top Tips on what Information to keep • Item 022 Factsheet 3 – Information Management Strategy : Records Retention & Disposal Schedule • Item 002 Glasgow City Council Records Management Plan Action Plan
<p>Future Developments</p>	<p>The roll-out of EDRMS, which includes records management functionality, requires the identification of Records Officers who will be responsible for receiving, reviewing and action the system generated “Disposition Reports”. As this user role beds in, responsibility will be expanded to include information kept in other formats, starting with paper and eventually other digital formats including line of business IT applications.</p> <p>Records Officers will have a “dotted Line” reporting route to the council’s Records Series Owners and there is a project in progress to identify who these should be.</p> <p>The council also recognises that records are frequently held in IT applications (often legacy systems from pre-reorganisation) which do not have records management functionality. The council is committed to an ongoing review of these IT applications as they progress through their lifecycle with a view to incorporating records management requirements into upgrades and specifications for replacement.</p>
<p>Assessment and Review</p>	<p>The Corporate Governance team will be responsible for ownership and maintenance of the Glasgow City Council Records Retention & Disposal Schedule. A process has been communicated by which required updates are notified to the Corporate Governance team. Monitoring of compliance will also be the responsibility of this team working in conjunction with the council’s Internal Audit department.</p>
<p>Responsible Officer(s)</p>	<p>Dr Kenneth Meechan, Asset Governance Manager</p>

ELEMENT 6: DESTRUCTION ARRANGEMENTS

<p>Introduction</p>	<p>A mandatory element of the Public Records (Scotland) Act 2011, Element 6: Destruction arrangements should evidence the arrangements that are in place for the secure destruction of confidential information. Clear destruction arrangements detailing the correct procedures to follow when destroying business information are necessary in order to minimise the risk of an information security incident and ensure that the organisation meets its obligations in relation to the effective management of its records, throughout their lifecycle.</p>
<p>Statement of Compliance</p>	<p>The council recognises that a robust disposal policy, appropriately managed, secure the position of the council and help every member of staff in their day-to-day work. The council has set out the principles and procedures to be observed by council services regarding the disposal of records. These principles require disposals to be: authorised, appropriate, secure and confidential, timely and documented.</p> <p>This policy authorises council services to destroy records appropriately appraised under the following procedures:</p> <ul style="list-style-type: none"> • under routine administrative action • authorised by the controlling section/service • authorised under retention and disposal schedules <p>It also requires the destruction to be</p> <ul style="list-style-type: none"> • appropriate, irreversible and environmentally friendly • secure and confidential • timely, and documented <p>Glasgow City Archives and Records Management service (Glasgow Life) manages the hard copy paper records. It is a mature programme (established in 1983) and there are clear procedures and an audit trail of :</p> <ul style="list-style-type: none"> • approval and authorisation, including details of officer authorising disposal , and • person undertaking disposal and documentation confirming disposal occurred <p>Destruction of highly sensitive hard-copy records will be supervised by an appropriate officer, normally from the Archives and Records Management service.</p> <p>Confidential waste is deposited in locked consoles which are also destroyed by the City Building.</p> <p>Disposals of hard drives will be disposed of securely by Access Services in accordance with the Information Security Policy.</p> <p>Data in EDRMS and other business systems will be deleted in such</p>

	a way that prevents reconstruction.
Evidence of Compliance	<p>Primary evidence to be submitted in support of Element 6 includes:</p> <ul style="list-style-type: none"> • Item 023 - Glasgow City Council Disposal Policy • Item 024 – Glasgow City Archives & Records Management Destruction Procedures for Records Managers & Senior Archivist • Item 025 – Glasgow City Archives & Records Management – Records Management Destruction Procedure • Item – 026 Glasgow City Archives & Records Management Destruction Checklist • Item 027 – Glasgow City Archives & Records Management Destructions Picklist • Item 028 – Glasgow City Archives & Records Management Consignment Destruction Audit Sheet Example 1 • Item 029 – Glasgow City Archives & Records Management Consignment Destruction Audit Sheet Example 2 • Item 030 – City Building (Glasgow) Secure Destruction Control Sheet Example 1 • Item 031 – City Building (Glasgow) Secure Destruction Control Sheet Example 2 <p>Supporting evidence to be submitted includes:</p> <ul style="list-style-type: none"> • Item 018 - Glasgow City Council Records Retention and Disposal Schedule • Item 008 - Records Management Handbook • Item 002 - GCC Records Management Plan Action Plan
Future Developments	Periodic inspection of the destruction facilities will be carried out to ensure security is adequate and that records are destroyed soon after they are received.
Assessment and Review	Annual
Responsible Officer(s)	Dr. Kenneth Meechan, Asset Governance Manager

ELEMENT 7: ARCHIVING & TRANSFER ARRANGEMENTS

Introduction	<p>A mandatory element of the Public Records (Scotland) Act 2011, Element 7: Archiving and transfer arrangements should detail the processes in place within an organisation to ensure that records of long term historical value are identified and deposited with an appropriate archive repository. Arrangements for the transfer of material of enduring value to an archive should be clearly defined and made available to all staff in order to ensure that the records are transferred at their earliest opportunity and the corporate memory of the organisation is fully and accurately preserved.</p>
Statement of Compliance	<p>The Council approved the Appraisal and Disposal Policy: Preserving the Archival and Historic Memory of Glasgow in 2012. The policy replaces an earlier policy (1999).</p> <p>This policy sets out the strategic framework, objectives, and guidelines which will be used to determine whether Council records have archival value. It also provides more specific guidelines for appraising certain categories of records.</p> <p>The City Archivist is responsible for deciding which records are to be kept permanently after liaising with the appropriate business areas. There are clear principles to help ensure that we identify and preserve records which document the:</p> <ul style="list-style-type: none"> • rights of the citizen • principal actions of the council and its officials, and • community experience <p>The largest and most significant part of the City Archive is the official records of Glasgow City Council and predecessor authorities. Services continue to transfer material to the archives. The new framework have clearly assisted in the process:</p> <ul style="list-style-type: none"> • helping departments to identify possible archival material, particularly during the large office rationalisation • assisting the archivists to appraise records held in the records management programme
Evidence of Compliance	<p>Primary evidence to be submitted in support of Element 7 includes:</p> <ul style="list-style-type: none"> • Item 032 - GCC Appraisal & Disposal Policy • Item 107 – Policy on Records Management and Preservation of Archival Records (superseded 2013) • Item 008 - GCC Records Management Handbook • Item 033 – 2011 Accessions Return Official Records • Item 034 - 2012 Accessions Return Official Records • Item 111 – Collections Level Description Official Archives <p>Supporting evidence to be submitted includes:</p> <ul style="list-style-type: none"> • Item 018 - GCC Records Retention & Disposal Schedule
Future	<p>The City Archivist (or delegate) will:</p>

Developments	<ul style="list-style-type: none">• work with business units to further develop Retention & Disposal Schedules, to clearly identify records series to be kept permanently and transferred to the Archives.• prepare a transfer form, which will ask business units to recommend records series which include major key functions, policies, programmes and significant issues.
Assessment and Review	Annual
Responsible Officer(s)	Dr. Kenneth Meechan, Asset Governance Manager

ELEMENT 8: INFORMATION SECURITY

<p>Introduction</p>	<p>A mandatory element of the Public Records (Scotland) Act 2011, Element 8: Information security must make provisions for the proper level of security of its records. There must be evidence of robust information security procedures that are well understood by all members of staff. Information security policies and procedures are essential in order to protect an organisation's information and information systems from unauthorised access, use, disclosure, disruption, modification, or destruction.</p>
<p>Statement of Compliance</p>	<p>GCC's Information Security Policy is a high level document which sets out the council's strategic direction with regard to information security and is based on the 7 principles of information security listed below:</p> <ul style="list-style-type: none"> • Data Protection - Ensuring data is protected. • Relevance and Consistency - Ensuring the controls in place to ensure information security are relevant to the risk and applied consistently across the organisation. • Security is an Enabler - Viewing information security as a means of assisting rather than hindering the business strategy. • The Right Access - Employees require the right access to effectively do their job, but how can we share information to improve efficiencies and effectiveness. • Plan for the Unexpected - Regardless of vigilance vulnerabilities will emerge as new attacks occur and viruses mutate. Glasgow must anticipate this and be prepared. • Security for the Whole Lifecycle - Security should be considered from the start of a project and not bolted on later. • Accountability - It must be possible to hold authorised users of information accountable for their actions. <p>To ensure effective implementation in practice, this policy is underpinned by guidelines.</p> <ul style="list-style-type: none"> • The Corporate Information Security Guidelines give basic advice on basic information security, use of the internet at work, email and mobile devices. They also provide guidance on taking information out of the workplace, using IT equipment at home and what to do if something goes wrong. • The Policy and Guidelines on the Acceptable Use of ICT explains how ICT facilities may be used and the conditions in place relating to individual use. <p>Further guidance in the area of web management and security are:</p> <ul style="list-style-type: none"> • Guidance on the use of E-Mail

- Guidance on linking to and from the Corporate Website
- Guidance on the use of Domain Names
- Guidance on the use of Memory Sticks and other portable equipment
- Password Management

In terms of governance,

The Corporate Management Team (CMT) sets the strategic direction in relation to information security and ensures resources for implementation. The fact that Information Security is represented at this level demonstrates its level of importance to Glasgow City Council.

Reporting into the CMT, the Information Security Board (ISB) is chaired by the Executive Director of Corporate Services who is also a member of the CMT. The Board champions Information Security and provides strategic leadership. It is attended by representatives from all council departments and larger arms length organisations (ALEOs).

The Corporate Governance team is responsible on behalf of the ISB for the development of the Information Security Policy and for liaison with ACCESS LLP and the ICT functions of ALEOs. The Corporate Governance Team will take advice from ACCESS on ICT and property aspects of information security.

The Information Security Management Group (ISMG) is composed of technical representatives of ACCESS, chaired by their Security Architect and attended by members of the Corporate Governance Team and ICT representatives from ALEOs. This group is responsible for the technical aspects of information security and technical compliance. Internal audit regularly reviews the council with regard to information security issues as part of their strategic plan.

The ACCESS Information Security Architect, is responsible for advising the council on its approach to information security, and in this role is involved in the key groups outlined above.

Staff information security obligations are included in the Code of Conduct which forms part of the council's Employee Handbook.

As recently as May 2013, the Executive Director of Corporate Services reinforced the importance of Information Security, including Data Protection, via a communication to every staff member which sets out personal responsibilities. The communication further sets out the requirement for all staff to complete the Council's on-line Information Security training course, and also includes links to the Information Security guidance on the Council's Intranet. This was followed up by a

	further message on Asset Management and Information Security in June 2013 with accompanying Briefing.
Evidence of Compliance	<p>Primary evidence to be submitted in support of Element 8 includes:</p> <ul style="list-style-type: none"> • Item 035 Information Security Message from Annemarie O'Donnell, Executive Director, Corporate Services • Item 036 Asset Management & Information Security Message from Annemarie O'Donnell, Executive Director, Corporate Services • Item 037 Asset Management Briefing • Item 038 GCC Employee Handbook • Item 039 Glasgow City Council Information Security Policy • Item 039a Minute of Committee Approving GCC Information Security Policy • Item 040 Glasgow City Council Protective Marking Policy • Item 041 Corporate Information Security Guidelines • Item 042 Policy & Guidelines on the Acceptable Use of ICT • Item 043 Email User Guidelines • Item 044 Guidance on the Use of Links • Item 045 Guidance on the use of Domain Names • Item 046 Guidance on the Use of Memory Sticks and Other Portable Equipment • Item 047 Top Tips for Password Management • Item 048 GCC Data Security Breach Strategy • Item 049 Security Awareness for GSX • Item 008 Glasgow City Council Records Management Handbook <p>Supporting evidence:</p> <ul style="list-style-type: none"> • Item 002 Glasgow City Council Records Management Plan Action Plan
Future Developments	<p>An on-line Asset Management course is being developed for Managers. Completion of this course will be mandatory. The Information Security and Assurance Team are currently reviewing each of the policies to ensure that they are relevant to, and applied uniformly across, the whole organisation.</p> <p>The council will monitor compliance with the instruction for all staff who handle sensitive data to undergo the on-line Information Security and Data Protection training and take action to ensure that all staff complete this. Reports will be generated at intervals to ensure ongoing compliance with this requirement.</p> <p>The council has procured a Protective Marking software solution and will roll-out this out along with the accompanying Policy, in conjunction with the launch of the new Government Security Classifications Policy (GSCP).</p>
Assessment and	The policies and guidance will be reviewed annually by

Review	Corporate Governance section and the Information Security Board.
Responsible Officer(s)	Dr Kenneth Meechan, Asset Governance Manager

ELEMENT 9: DATA PROTECTION

<p>Introduction</p>	<p>The Keeper expects an organisation to provide evidence of compliance with data protection responsibilities for the management of all personal data.</p>
<p>Statement of Compliance</p>	<p>Glasgow City Council has a legal obligation to comply with the requirements of the Data Protection Act 1998, in relation to the management, processing and protection of personal data. From the outset, the council sets out the responsibilities of officers and Elected Members in its Employee Handbook, plus content in corporate and new Member induction training. This is reinforced through the ongoing guidance available through the council's Intranet, and directly from the Asset Governance Manager and Executive Legal Manager. As recently as May 2013, the Executive Director of Corporate Services reinforced the importance of Information Security, including Data Protection via a communication to every staff member which sets out personal responsibilities. The communication further sets out the requirement for all staff to complete the council's on-line Data Protection training course, and also includes links to Data Protection guidance on the council intranet.</p> <p>The council's day to day management of requests for information which fall under the scope of Data Protection is handled by the Corporate Compliance Officer, supported by the Corporate Customer Care Team. The Corporate Compliance Officer liaises on a daily basis with a network of Data Protection Officers who collectively form the council's Data Protection Forum which meets every 6 weeks. Performance is a standing agenda item and this is supplemented by items such as new developments.</p>
<p>Evidence of Compliance</p>	<p>Glasgow City Council's registration number in the Data Protection Register is Z4871657.</p> <p>Primary evidence to be submitted in support of Element 9 includes:</p> <ul style="list-style-type: none"> • Item 038 Employee Handbook Version 6.0 September 2012 • Item 035 Information Security Message from Anne Marie O'Donnell, Executive Director Corporate Services • Item 050 Glasgow City Council Data Protection Subject Access Policy • Item 051 Information Use & Privacy Policy • Item 051a Privacy Statement • Item 052 Glasgow City Council Data Protection General Guidance • Item 053 Glasgow City Council Data Protection Short Guidance • Item 040 Glasgow City Council Protective Marking Policy <p>Supporting evidence to be submitted includes:</p> <ul style="list-style-type: none"> • Item 054 Data Protection Forum Agenda • Item 055 Data Protection Forum Performance Report • Item 056 Glasgow City Council Data Processor Agreement • Item 057 Glasgow City Council Data Protection Access to

	<p>Personal Information</p> <ul style="list-style-type: none"> • Item 058 Glasgow City Council Data Protection Access to your own personal information • Item 059 Glasgow City Council Data Protection Collection of Personal Data • Item 060 Glasgow City Council Data Protection Exemptions Permitting Disclosure of Personal Data • Item 061 Glasgow City Council Data Protection Exemptions Permitting Withholding of Personal Data • Item 062 Glasgow City Council Data Protection Identification • Item 063 Glasgow City Council Data Protection Informal Requests • Item 064 Glasgow City Council Data Protection Requests for Personal Images and Recordings • Item 065 Glasgow City Council Data Protection Requests from Elected Members • Item 066 Glasgow City Council Data Protection Requests from Lawyers • Item 067 Glasgow City Council Data Protection Requests from or on behalf of Minors • Item 068 Glasgow City Council Data Protection Requests from Police Officers • Item 069 Glasgow City Council Data Protection Responding to a Subject Access Request • Item 070 Glasgow City Council Data Sharing Protocol Template • Item 071 Glasgow City Council Standard System Access Agreement • Item 008 Glasgow City Council Records Management Handbook • Item 002 Glasgow City Council Records Management Plan Action Plan • Item 072 – ICO Privacy Impact Assessment Overview • Item 073 – ICO Conducting Privacy Impact Assessment Code of Practice • Item 074 – ICO Privacy Impact Assessment Handbook
<p>Future Developments</p>	<p>The council will monitor compliance with the instruction for all staff to undergo the on-line Data Protection training and take action to ensure that all staff members complete this. Reports will be generated at intervals to ensure ongoing compliance.</p> <p>The council has procured a Protective Marking software solution and will roll-out this out along with the accompanying Policy, in conjunction with the launch of the new Government Security Classifications Policy (GSCP).</p>
<p>Assessment and Review</p>	<p>The policies and guidance will be reviewed annually by Corporate Governance section.</p>
<p>Responsible Officer(s)</p>	<p>Asset Governance Manager (Dr Kenneth Meechan) Executive Legal Manager (Roddy Maciver).</p>

ELEMENT 10: BUSINESS CONTINUITY AND VITAL RECORDS

<p>Introduction</p>	<p>It is recommended that a Business Continuity and Vital Records Plan is in place in order to ensure that key records and systems are protected and made available as soon as possible in the event of, and following, an emergency. The plan should identify the measures in place to prepare for, respond to and recover from such an emergency.</p>
<p>Statement of Compliance</p>	<p>The council has Emergency Plans in place to deal with a range of contingencies and these plans are owned by the council's Resilience Team which is located in the Corporate Governance department.</p> <p>Each service team has its own Business Continuity Plan along with a nominated officer tasked with its ownership and maintenance. Each Plan is based on a number of scenarios which will include:</p> <ul style="list-style-type: none"> • Loss of access to premises • Loss of communications • Loss of systems <p>Each of these scenarios has the potential to negatively impact access to information.</p> <p>The following paragraphs outline what impact these scenarios could have for the categories of information the council holds:</p> <p>Structured Information</p> <p>This largely refers to data held in council line of business IT applications, which are generally backed up nightly and may have specific disaster recovery arrangements associated with them depending on their designation of Platinum, Gold, Silver or Bronze. In the event of the 'loss of access to premises' scenario for reasons such as fire, flood or a civil emergency, the information itself should remain secure and accessible from unaffected sites and for certain users, on a remote basis via the council's virtual private network. Each department has its own plan for dealing with this scenario should it come to fruition.</p> <p>Loss of communications has the same impact as loss of access to the site. For example a cable strike in the vicinity of the location may render use of the site to be limited, requiring operations to be carried out from other places in order to maintain continuity. Again, individual departments have plans for this which will include identification of alternative locations and essential staff members who can, as a minimum, provide a limited service.</p> <p>Where there has been a serious failure directly involving a council IT application or applications then there will be a need to invoke business continuity plans to maintain operations, and disaster recovery plans to restore the relevant system. Support for the majority of the council's IT applications and the network is provided by ACCESS LLP, which is a joint venture between Glasgow City</p>

	<p>Council and Serco, and which has been providing ICT services to the council since April 2008. For the majority of council IT applications a high level of resilience has been designed into the IT architecture resulting in the risk of catastrophic failure being low. Nevertheless, the council's IT strategy is that there should be specific Disaster Recovery Plans in place for systems which support life and limb operations and systems that support corporate revenue generating or support activities, over and above the fact that the application data is backed up on a nightly basis.</p> <p><i>Unstructured Information – Non-Electronic</i></p> <p>This refers to the information, largely but not exclusively paper, which is held by or on behalf of the council. Of the three scenarios outlined above, the most relevant is “loss of access to premises”, which could not only restrict the ability of users to access the information, but depending on the nature of the incident, could have damaged or destroyed the information itself.</p> <p>It is the council's direction of travel to reduce the volume of non-electronic information that it holds. The Non-electronic Records Strategy, which will begin by undertaking surveys of the sites where non-electronic information is held, will provide the means to assess the risks to the information in terms of security and environmental factors. In addition, the survey will also provide a log of information held at these sites, enabling the application of records retention and disposal rules for the records series in question. Once established that the information requires to be retained, if it needs to be kept for more than 8 years then a case will be made for arranging for the documents to be scanned and stored in the EDRMS under automated retention conditions. If the survey identifies that the information needs to be kept for up to 8 years and that there is significant security or environmental risk to the information or users, then the site will have to be upgraded to the required standards or the information relocated to the council's approved central off-site storage facilities.</p> <p>Loss of access to sites may also separate users from information on a temporary basis, and departments will need to include in their business continuity plans, provision for relocating the information with staff or arranging access to the information without compromising safety or information security.</p> <p><i>Unstructured Information – Electronic</i></p> <p>The council is currently in the process of migrating from its current shared drive environment, which is difficult to manage from a records management perspective, to the council's EDRMS. While the shared drive environment is backed up on a nightly basis it does not have a specific disaster recovery plan. By the time this migration is complete it is planned that a specific Disaster Recovery Plan will be in place for the EDRMS, and this will address the “loss of system” scenario.</p> <p>The same narrative described above under Structured Information –</p>
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	<p>Electronic also applies here for the scenarios relating to loss of access to premises and loss of communications, in that it is likely that in spite of the incident both the shared area environment and EDRMS will be available.</p> <p>It will not be the council's policy to endorse the widespread practice of holding the same information in paper and electronic format. However, it will be permitted to hold separate copies of "Vital Records" as a means of supporting business continuity and disaster recovery.</p> <p>Vital Records</p> <p>As part of departmental business continuity planning, departments should have identified the key documents that would be necessary to support recovery and maintain essential services pending full restoration. These documents could be electronic or paper based. In addition, departments should have made contingency plans which make provision for access to these vital records in the event of the above or other scenarios occurring.</p> <p>However, business continuity has until recently largely been the domain of local departments. This view is starting to change. In recent times, the council's Emergency Planning Unit has been re-designated as the Resilience Unit, and is now located in the Corporate Governance Team. The new remit includes review and oversight of departmental business continuity plans. Part of this will entail identifying departmental vital records and the arrangements that are in place for storing them. Where activities have been devolved and where previously there has been no overarching governance in place it tends to be the case that work of this nature is carried out with differing degrees of diligence across the organisation. The council recognises that this has to change and will ensure that all departmental business continuity plans are robust, and that all vital records together with their management arrangements are identified, documented and collated in a central register.</p>
<p>Evidence of Compliance</p>	<p>Primary evidence to be submitted in support of Element 10 includes:</p> <ul style="list-style-type: none"> • Item 075 Information Management Strategy Board Paper – Non Electronic Records Strategy • Item 076 Business Enquiry Form – Review of Existing Livelink Support Arrangements • Item 008 Glasgow City Council Records Management Handbook • Item 113 Sample GCC Business Continuity Plan – Resilience Team • Item 114 ACCESS Contract Schedule 11 Disaster Recovery Plan • Item 115 ACCESS Contract Schedule 2 Part 3 Servers and Data Centres • Item 116 ACCESS Contract Schedule 2 Part 11 Management Services <p>Supporting evidence to be submitted includes:</p>

	<ul style="list-style-type: none"> Item 002 Glasgow City Council Records Management Plan Action Plan
Future Developments	The council will consider the case for procuring and implementing a disaster recovery solution for EDRMS. An exercise will also be undertaken to identify and secure all vital records.
Assessment and Review	All council Business Continuity and Disaster Recovery Plans are reviewed every year and tested bi-annually. ACCESS LLP will review and test all IT business continuity and disaster recovery arrangements as per contract and as required for each IT system.
Responsible Officer(s)	Dr Kenneth Meechan, Asset Governance Manager, Neil Farnell, Resilience Manager, and Ronnie Kyle, Chief Operating Officer, ACCESS LLP, Dr Irene O'Brien, Senior Archivist, Glasgow Life.

ELEMENT 11: AUDIT TRAIL

<p>Introduction</p>	<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. The Keeper will expect an authority's records management system to provide evidence that the authority maintains a complete and accurate representation of all changes that occur in relation to a particular record.</p>
<p>Statement of Compliance</p>	<p>The council recognises that all records, regardless of format, must be captured in a record-keeping system and have systematic controls applied to them. The Council has agreed Audit Trail guidelines which relate to:</p> <ul style="list-style-type: none"> (a) Records Centre(s) managed by Glasgow City Archives and Records Management (Glasgow Life) (b) storage of records in service premises or with commercial provider (c) electronic document and records management system (EDRMS) and other electronic media <p>Hard Copy Records</p> <p>The hard copy records are held in secure storage in the Mitchell Library which is managed by Glasgow City Archives and Records Management service (ARMS). There are electronic and paper trails for all transactions relating to receipt, transfer, return and disposal of records. The same systems will be implemented by the ARMS team in the new records management facility within City Building's premises at Darnick Street.</p> <p>Where hard copies are held in Services' own premises (whether these are owned or leased), services will be required to adhere to Glasgow City Council Policy on Storage in Departmental Premises, which requires business units to:</p> <ul style="list-style-type: none"> (a) adopt a formal system of registering files (b) track the movement (where this is to another business area) and use of records from within the file registration system <p>The same standards are required of any commercial premises.</p> <p>Electronic Media: Unstructured</p> <p>The council's has invested in the OpenText Livelink Electronic Document Records Management System (EDRMS) to assist with the management of unstructured electronic information, which includes e-mails, word processing documents, spread sheets, presentations, images, and PDF documents.</p> <p>In Livelink, an audit trail is automatically started every time a new folder or document is added. Any alteration or any authorised and/or unauthorised action after a record has been created is routinely recorded (and a new record created) and the system will maintain a record of these business process actions (i.e. new version,</p>

	<p>when/who accessed, when/who altered, when/who deleted).</p> <p>There is an issue about records currently held in a standard electronic environment which can be moved, edited, renamed and deleted without any of these actions being auditable. Records still required for business or other purposes, will largely be transferred to Livelink as part of the transition process, thus making future changes to these records fully auditable.</p> <p>This investment and the roll out of Livelink across services will enable the council to ensure that records are increasingly captured in a fully compliant record-keeping system and have systematic audit controls applied to them.</p> <p><u>Electronic Media : Structured Information</u></p> <p>The council utilises a large number of line of business IT applications. These may either be legacy council systems or alternatively procured systems which are in use in a number of public and private sector organisations. These systems are generally not records management compliant and this issue can only be addressed as the applications complete their life cycle and GCC and other users work collectively to ensure that new requirements and specifications address records management issues.</p>
<p>Evidence of Compliance</p>	<p>Primary evidence to be submitted in support of Element 11 includes:</p> <ul style="list-style-type: none"> • Item 038 Glasgow City Council Employee Handbook • Item 008 Glasgow City Council Records Management Handbook • Item 039 Glasgow City Council Information Security Policy • Item 041 Glasgow City Council Corporate Information Security Guidelines • Item 052 Glasgow City Council Data Protection Guidance • Item 078 – Glasgow City Council Audit Trail Framework • Item 079 – Glasgow City Council Storage of Records in Service Premises Policy & Templates • Item 080 - GCARMS Key Guidelines (Not for Publication) • Item 081 – GCARMS Example 1 Records Access List (Not for Publication) • Item 082 - GCARMS Example 2 Records Access List (Not for Publication) • Item 083 - GCARMS Production Procedure • Item 084 - GCARMS Sample Production Ticket • Item 085 - GCARMS Making Records Current Procedure • Item 086 - GCARMS Returns Procedure • Item 087 - GCARMS Example 1 Enquiry & Search Form (Not for Publication) • Item 088 - GCARMS Example 2 Enquiry & Search Form (Not for Publication) • Item 089 - GCARMS Records Management Depositing Procedure • Item 090 - GCARMS Records Transfer Form • Item 091 - GCARMS System Output Sheet

	<ul style="list-style-type: none"> • Item 092 - GCARMS Transfer of Boxes to City Building • Item 093 - GCARMS Records Management System Screenshot 1 (Not for Publication) • Item 094 - GCARMS Records Management System Screenshot 2 (Not for Publication) • Item 095 - GCARMS Records Management System Screenshot 3 (Not for Publication) • Item 096 - GCARMS Records Management System Screenshot 4 (Not for Publication) • Item 097 – GCARMS Example Production Authorisation & Ticket • Item 098 – GCARMS Returns Form • Item 099 Screenshots – Livelink Audit Trails <p>Supporting evidence to be submitted includes:</p> <ul style="list-style-type: none"> • Item 002 Glasgow City Council Records Management Plan Action Plan
Future Developments	All staff are required to complete the council's on-line Information Security and Data Protection courses. A further course on asset management specifically for managers is under development.
Assessment and Review	All audit trail arrangements will be monitored on an annual basis by the Asset Governance Manager.
Responsible Officer(s)	Dr. Kenneth Meehan, Asset Governance Manager

ELEMENT 12: COMPETENCIES OF RECORDS MANAGERS

Introduction	Core competencies and key knowledge and skills required by staff with responsibilities for records management should be clearly defined and made available within organisations so as to ensure that staff understand their roles and responsibilities, can offer expert advice and guidance, and can remain proactive in their management of recordkeeping issues and procedures. With core competencies defined, the organisation can identify training needs, assess and monitor performance, and use them as a basis from which to build future job descriptions.
Statement of Compliance	<p>Glasgow City Archives and Records Management Service, which is part of Glasgow Life, supports the council's record-keeping activities.</p> <p>It includes 5 professional record-keepers: the City Archivist (currently designated Senior Archivist), 4 Archivists, and 3 support staff. The latter are responsible for the day-to-day operation of the records management programme.</p> <p>All 5 professional posts require a Post-graduate Qualification (or equivalent) in Archives and Records Administration. The Senior Archivist post has not been advertised for a number of years, but the Policy on Records Management and Preserving Archival Records outlines the responsibilities of this post. A post of Archivist has recently been advertised and a role profile and person specification is attached as evidence.</p> <p>The Council has established a Records Management Competency Matrix Framework for those working in records management. This is based on the competence framework produced by the Archives and Records Association. The framework will be used for all staff involved in record-keeping activities and not just records managers.</p>
Evidence of Compliance	<p>Primary evidence:</p> <ul style="list-style-type: none"> • Item 100 Records Management Competency Matrix Competency Framework • Item 107 GCC Policy on Records Management and the Preservation of Archival Records • Item 109 Role Profile, Technical Services • Item 110 Person Specification, Archivist
Future Developments	The council will match roles to competency levels so that all relevant staff are appropriately mapped to the appropriate skills matrix.
Assessment and Review	There will be an on-going analysis of skills gaps, and training will be provided to help close those gaps.
Responsible Officer(s)	Dr Kenneth Meechan, Asset Governance Manager

ELEMENT 13: ASSESSMENT & REVIEW

<p>Introduction</p>	<p>Records Management practices in place within an organisation must remain fit for purpose. Procedures should be closely monitored, assessed and reviewed with a view to ensuring ongoing compliance and commitment to best practice recordkeeping. The Keeper expects the Records Management Plan to have in place mechanisms for regularly reviewing the contents of the Plan to ensure processes are operating successfully and identifying processes which require modification.</p>
<p>Statement of Compliance</p>	<p>The council is committed to ensuring a high level of performance of its processes and systems and therefore to incorporating regular reviews and assessments of its Records Management Policy. Ensuring all systems support business needs and comply with regulatory and accountability requirements will require regular review and assessment of:</p> <ul style="list-style-type: none"> • record-keeping systems, procedures and practices; and • compliance of all staff members <p>The council is committed to regular and formalised review and assessment through policy development, monitoring and assessment, and reporting.</p> <p>The review and assessment framework commits the council to (a) regular assessment and review of the Records Management Policy (b) on-going development and implementation of record-keeping policies and guidelines, training and awareness programmes, planning and other tools (c) using self-assessment as primary tool to monitor and review its record-keeping systems and processes, and where appropriate external validation, internal or external audit (d) system of regular reporting to allow the council and its services to address the key actions and objectives identified within the Records Management Policy.</p>
<p>Evidence of Compliance</p>	<p>Primary evidence to be submitted in support of Element 13 includes:</p> <ul style="list-style-type: none"> • Item 103 GCC RMP Review and Assessment Framework • Item 012 Records Management Policy <p>Supporting evidence to be submitted includes:</p> <ul style="list-style-type: none"> • Item 106 GCC IMS Stakeholder Engagement Strategy • Item 108 GCC IMS Project Communications Project Plan
<p>Future Developments</p>	<p>There will be an annual assessment of the Records Management Policy, a year from the date of approval of the RMP by the Keeper. Major reviews will be conducted every 3 years.</p> <p>All services will be required to undertake a baseline self-</p>

	<p>assessment during 2014-2015, full assessment survey in a four-year cycle, and a level of self-assessment annually or as the need arises. Self-assessment will require services to devise action plans and reports back. Specific areas for monitoring activities may be specified by the Asset Governance Manager. Self-assessment may be augmented by external validation, internal or external audit.</p> <p>The Council Management Group (CMG) will stipulate the frequency and level of reporting mechanisms and processes required to ensure that they are kept informed about record-keeping compliance and continuous improvement across the whole of the council.</p> <p>The council will establish the nature and regularity of reports required from EDRMS.</p>
Assessment and Review	Assessment and review framework assessed annually.
Responsible Officer(s)	Dr. Kenneth Meechan, Asset Governance Manager.

ELEMENT 14: SHARED INFORMATION

<p>Introduction</p>	<p>Procedures for the efficient sharing of information both within an organisation and with external partners are essential for ensuring information security and recordkeeping compliance. Protocols should include guidance as to what information can be shared, who should retain the data, what levels of security are to be applied, who should have access, and what the disposal arrangements are.</p>
<p>Statement of Compliance</p>	<p>The council has long been an advocate of recognising that public services are not delivered in a vacuum and that proper records management requires taking account of the complex landscape which exists in terms of joint working, multi-agency interventions, and indeed the complexity of the council's own external structures. The council has also recognised that any such joint working will invariably involve the exchange of information between the agencies concerned, and that this raises issues in particular around data protection compliance.</p> <p>The council is committed to ensuring that service delivery is developed to provide the best possible service to our service users, and that this will very often involve joint working both across the council family and with external organisations. The council will facilitate this joint working through the use of data sharing protocols and agreements, supported by appropriate technical safeguards, to allow information supporting service delivery to be exchanged in a safe and efficient manner while respecting the rights of those whose information is or may be shared.</p> <p>The council's approach to shared information is to treat this on a number of different levels:</p> <ul style="list-style-type: none"> • At the highest level, the council has an Information Use and Privacy Policy which sets out the principles the council will assess in determining whether it will become involved in an initiative which involves the external sharing of information. At this level, the critical questions asked are couched in terms of respect for the right to privacy in terms of Article 8 of the European Convention on Human Rights, and the lawfulness, necessity and proportionality of the proposed information exchanges. This analysis is supported by a privacy impact assessment where necessary. • Once the high level decision is taken, we need to be clear to our service users when they are going to be involved in a joint service or when it is necessary for the council to share information with them. The council meets this requirement through having a layered privacy statement on its website at www.glasgow.gov.uk/privacy, this layered approach being in compliance with the ICO Code of Practice on privacy notices. The layered privacy notice explains in some detail the specifics of joint working and information sharing as it affects private individuals. • At the next level, we need to be clear when we will share information about people only with their consent, and when we

	<p>will share information without consent – and we also need to convey this information to those affected. The privacy statement covers this in many areas but the forms used to capture information from individuals are progressively being re-designed to make this clearer, and to cross-refer to the online privacy statement.</p> <ul style="list-style-type: none"> • Having reached our internal position on whether to share, what to share and on what basis, the council then ensures that it gets written agreement on all these points from the partner agency. This written agreement is specifically designed to capture all the requirements of the ICO Code of Practice on Data Sharing, and includes a lot of specifics on the precise detail of what information will be exchanged, how it will be transmitted securely, how long it will be kept for, and what will happen to it at the end of the joint working phase. <p>The agreement the council has with NHS Greater Glasgow and Clyde is perhaps the highest-profile example of this; recently updated, the original version of this Protocol was one of the first documents to be formally endorsed by the Information Commissioner under the previous non-statutory code of practice on data sharing.</p> <p>Data is also shared across the council family. The council has formal agreements with each of its ALEOs under which the ALEOs are set up as data processors to the council. However it is now recognised that this inaccurately describes the situation and that most ALEOs are data controllers in their own right. A report by the then Head of Information Governance to the Extended Council Management Team on 12 March 2013 recognised this and approved the arrangements under which information is shared across the council family.</p>
<p>Evidence of Compliance</p>	<p>Primary evidence to be submitted in support of Element 14 includes:</p> <ul style="list-style-type: none"> • Item 070 Glasgow City Council Data Sharing Protocol Template • Item 071 Glasgow City Council Standard System Access Agreement • Item 051 Information Use and Privacy Policy • Item 051a Corporate Privacy Statement • Item 104 Report to ECMT on 12 March 2013 on data sharing across the council family. <p>Supporting evidence to be submitted includes:</p> <ul style="list-style-type: none"> • Item 072 Information Commissioners Office – Privacy Impact Assessment Overview • Item 073 Information Commissioners Office – Conducting Privacy Impact Assessment Code of Practice • Item 074 Information Commissioners Office – Privacy Impact Assessment Handbook
<p>Future Developments</p>	<ul style="list-style-type: none"> • The corporate privacy statement will continue to be updated and expanded to cover all main areas of joint working and information exchanges. • The data sharing protocol templates will be amended to make

	<p>more specific reference to compliance with the requirements of the Records Management Plans of one or more of the partner bodies.</p> <ul style="list-style-type: none"> • The service agreements with ALEOs will be updated to reflect more accurately the data flows between members of the council family
Assessment and Review	<ul style="list-style-type: none"> • The ISP with Greater Glasgow and Clyde Health Board is subject to periodic review by the Local Data Sharing Partnership. • The ALEO service agreements are periodically updated by GCC Corporate Governance and GCC Legal Services • The privacy statement is regularly updated by the Asset Governance Manager and is reviewed by the GCC data protection officer forum.
Responsible Officer(s)	Dr Kenneth Meechan, Asset Governance Manager

ELEMENT 15: WORKING WITH CONTRACTORS

<p>Introduction</p>	<p>This element is not contained within the model records management plan produced by NRS but has been identified by the council as a sensible addition in the context of how the council approaches the subject of information created by or held by contractors. The council considers that there are significant legal and operational distinctions between, on the one hand, appointing a contractor to carry out a function or service on behalf of the council (during which appointment public records will be created or utilised) and, on the other hand, the council sharing information with other bodies (typically other public bodies) so that both bodies can better provide their respective services. Element 14 covers the latter of these scenarios, and this additional element is intended by the council to cover the former scenario. This element is specifically intended to cover public records created by or on behalf of a contractor carrying out the council's functions, in terms of section 3(1)(b) and 3(2) of the Public Records (Scotland) Act 2011.</p> <p>This element is not intended to cover sharing information between the council and its group of arms-length external organisations (ALEOs) which are instead covered under Element 14.</p>
<p>Statement of Compliance</p>	<p>The council will identify scenarios where contractors will create or manage public records at the procurement stage and will include assessment of the tenderers' records management capability as part of the procurement process. Relevant contractors will be appointed under contracts which include appropriate clauses relating to the management of the public records which the contractor (or its own subcontractor chain) creates and/or manages on behalf of the council. These contracts will make specific provision for the survivorship and transfer of public records to the council or a successor contractor at the end of the contract period.</p>
<p>Evidence of Compliance</p>	<p>Primary evidence to be submitted in support of Element 15 includes:</p> <ul style="list-style-type: none"> • Item 105 GCC Draft RM Clauses for Procurement and Contracts <p>Supporting evidence to be submitted includes:</p> <ul style="list-style-type: none"> • Item 112 SCA guidance for contractors on records management
<p>Future Developments</p>	<ul style="list-style-type: none"> • The council will review its longer term contracts with a view to ascertaining whether public records are created or handled in terms of those contracts, meaning the council should then invoke contract change control procedures with a view to having the contract(s) amended to reflect the council's present approach to records management obligations. • Guidance will be developed for procurement officers to assist them in identifying those procurement exercises likely to lead to a situation where the appointed contractor(s) will be creating public records on behalf of the council. • Procurement strategy and Procurement toolkit to be updated to reflect this new guidance and the terms of this Plan.

<p>Assessment and Review</p>	<p>The terms of the procurement questionnaire and contract clauses will be monitored after one year by the Asset Governance Manager, Head of Corporate Procurement and Legal Manager (CPU).</p> <p>Individual contracts will be subject to review for compliance with records management obligations by the relevant commodity owner in CPU after the first year of the contract, and thereafter on a frequency based on the initial findings. If RM compliance is included as a matter subject to service credit deductions, it may be spot checked on each occasion a request for payment is submitted.</p> <p>Internal Audit will be invited to include contractor records management compliance in their annual audit plan.</p> <p>Contractors will be advised to take advantage of records management self-assessment tools and to report to the Council on the results of these.</p>
<p>Responsible Officer(s)</p>	<p>Dr Kenneth Meechan, Asset Governance Manager Avril Lewis, Acting Head of Corporate Procurement Deborah Henderson, Legal Manager (CPU and central services)</p>