



Records Management Policy

Board approved and accepted
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Records Management Policy

1. Introduction

- 1.1 West Dunbartonshire Leisure Trust recognises that the effective management of its records, regardless of format, is essential in order to support its functions and services to comply with legal, statutory, and regulatory obligations, and to demonstrate transparency and accountability. Records are a vital information asset and a valuable resource for the organisation's decision-making processes, policy creation and operations. They must be managed effectively from the point of their creation until their ultimate disposal.

2. Purpose and Scope

- 2.1 The purpose of this policy is to demonstrate the importance of managing records effectively within the organisation, to outline key aims and objectives for West Dunbartonshire Leisure Trust in relation to its recordkeeping, and to act as a mandate for the support and delivery of records management policies, procedures and initiatives across the organisation.
- 2.2 This policy relates to all Trust Services and all records created by its employees.
- 2.3 The policy applies to all staff, including those who are mobile working, working off site, including permanent and temporary employees, volunteers, contractors and those on secondment or work experience placements. It applies to all records regardless of format or medium, including paper, electronic, audio, visual, microform and photographic.

3. Role of Records Management

- 3.1 Records management can be defined as the process whereby an organisation manages its records, whether created internally or externally, and in any format or media type, from their creation or receipt, through to their destruction or permanent preservation.
- 3.2 Records management is about placing controls around each stage of a record's life cycle, at the point of creation (through the application of version control and naming conventions), during maintenance and use (through the management of security and access classifications, facilities for access and tracking of records), at regular review intervals (through the application of retention and disposal criteria), and ultimate disposal (whether this be recycling, confidential destruction or transfer to the archive branch for permanent preservation). By placing such controls around the life cycle of a record, the Trust can ensure it demonstrates the key attributes of authenticity, reliability, integrity and accessibility, both now and in the future.
- 3.3 Through the effective management of the organisation's records, West Dunbartonshire Leisure Trust can provide a comprehensive and accurate account of its activities and transactions. This may be achieved through the management of effective data as well as the maintenance of comprehensive audit trail data.
- 3.4 West Dunbartonshire Leisure Trust retains records that provide evidence of its functions, activities and transactions, for:-

Operational Use - to serve the purpose for which they were originally created, to support W.D.L.T.'s decision making processes, to allow the Trust to look back at decisions made previously, learn from previous successes and failures, and to protect the organisation's assets and rights.

Internal and External Accountability - to demonstrate transparency and accountability for all actions, to provide evidence of legislative, regulatory and statutory compliance and to demonstrate that all business is conducted in line with best practice.

Historical and Cultural Value - to protect and make available the corporate memory of the Trust to all stakeholders and for future generations.

4. Benefits of Records Management

4.1 Information and records is a valuable corporate asset without which the Trust would be unable to carry out its functions, activities and transactions, meet the needs of its stakeholders, and ensure legislative compliance.

4.2 The benefits of implementing records management systems and processes include:-

- Improved information sharing and the provision of quick and easy access to the right information at the right time.
- The support and facilitation of more efficient service delivery.
- Improved business efficiency through reduced time spent searching for information.
- Demonstration of transparency and accountability for all actions.
- The maintenance of the corporate memory.
- The creation of better working environments and identification of opportunities for office rationalisation and increased mobile working.
- Risk management in terms of ensuring and demonstrating compliance with all legal, regulatory and statutory obligations.

5. Principles of Records Management

The Trust will adhere to the following records management principles:

- Records must be managed in accordance with legislation.
- Records are a valuable resource and must be managed accordingly.
- Records must be disposed of in accordance with approved Records Retention Schedules.
- Records that are identified as vital must be protected.
- Records that are identified as of historical significance must be preserved.
- Records must be stored within record keeping systems and appropriately secured.
- Records must be shared and not duplicated.
- Records management is a responsibility for all staff and therefore records management procedures must be understood by all staff who will be appropriately trained.

- Records management practices must adhere to corporate policy, procedures and standards.
- Records keeping systems must be compliant with the requirements to manage records through their lifecycle.

6. Policy Statement

The records of West Dunbartonshire Leisure Trust constitute an auditable account of the Trust's activities, which provides evidence of the business, actions, decisions and resulting policies formed by the Trust.

Records represent a vital asset, which support the daily functions of the Trust and protect the interests and rights of staff, and members of the public, who have dealings with the Trust. Effective record keeping supports efficiency, consistency and continuity of work and enables the Trust to deliver a wide range of sustainable services. It ensures that the correct information is: captured, stored, maintained, retrieved and destroyed or preserved in accordance with business need, statutory and legislative requirements.

Records management is an essential part of enabling the Trust to achieve priority outcomes that reflect what is most important to the people and communities of West Dunbartonshire. The Trust will maintain a records management policy, procedures and practices across all its service areas which are based upon the requirements of the Public Records (Scotland) Act 2011, records management best practice and the foregoing principles.

These will be achieved through the consolidation and establishment of effective records management policies and procedures, including:-

- An Information Asset Register (IAR)
- The continuation of a business classification system to reflect the functions, activities and transactions of West Dunbartonshire Leisure Trust.
- Guidance for the management of retention and disposal of records.
- Guidance for destruction arrangements to detail the correct procedures to follow when disposing of business information.
- A vital records inventory to ensure that vital records held by West Dunbartonshire Leisure Trust remain accessible over time and that there are processes in place to monitor the integrity and usability of records.
- The review of audit trail mechanisms, the potential of existing systems, and the gap which exists between current provision and best practice, in order to produce a clear strategy for improving the capture and management of key events in a record's life cycle (e.g. creation, access, editing, destruction or preservation).
- Records management awareness for all appropriate staff.
- Ensuring all records management policies and procedures comply with Data Protection Act 2018 and General Data Protection Regulation (GDPR)
- All relevant records are retained in the appropriate legal format where applicable.
- In conjunction with the Trust Archivist the production of detailed archive transfer arrangements in order to provide advice and guidance on how to securely transfer records to the archive, define the appropriate status for various records,

and identify any relevant exemptions under the Freedom of Information (Scotland) Act 2002.

6.1 Roles and Responsibilities

- 6.1.1 All staff have a responsibility to manage records effectively through the documentation of all decisions and actions made by the Trust; the effective maintenance of records throughout their life cycle, including access, tracking and storage of records; the timely review of records and their ultimate disposal, whether this for permanent preservation, or confidential destruction and recycling.
- 6.1.2 All third party contractors engaged by the Trust and who create process or retain records on behalf of the Trust must have a robust records management plan to ensure efficient management, retention and secure destruction of those records when appropriate. The preferred solution for this is Scottish Trust Archivists Records Retention Scheme (SCARRS) but sector specific solutions are acceptable.
- 6.1.3 The General Manager is responsible for considering and approving changes to the Records Management Plan (including the business classification scheme, vital records inventory and review of audit trail mechanisms) and any associated standards. The Business Development Co-ordinator will report to the General Manager on records management matters and performance where required.
- 6.1.4 Managers within each service area report to the General Manager. Managers are responsible for implementing a corporate approach to the management of records as defined within this policy, promoting a culture of excellent record keeping principles and practices in order to improve business efficiency, supporting records management through commitment and the provision of resources and recognizing the importance of preserving W.D.L.T.'s corporate memory.
- 6.1.5 The Business Development Co-ordinator is the Trust's Lead Officer who will liaise directly with WDC's Senior Information Risk Officer (SIRO). The SIRO is a member of the WDC Senior Management Team and is responsible for overseeing service area information risks, including maintaining and reviewing an information risk register. The SIRO must understand the strategic business goals of the organisation and how these may be impacted by failure of information assets. The SIRO in conjunction with the other Managers for their respective service areas and corporate responsibilities, are responsible for ensuring that the management of information risks is weighed alongside the management of other risks facing the organisation. This includes financial, legal, ICT and operational risks.
- 6.1.6 The Business Development Co-ordinator will liaise with the WDC Records Management Officer (RMO) who reports to the Manager of Legal Services within Regulatory and is responsible for ensuring that records management practices and procedures are established in line with all legal obligations and professional standards. This includes issuing advice and guidance to all staff, providing training and liaising with departmental representatives throughout West Dunbartonshire Leisure Trust where appropriate.
- 6.1.7 Information Asset Owners (IAO) is Managers within their respective service areas that are responsible for each identified service information asset. Each IAO must understand what information is held, what is added and what is removed, how

information is moved, and who has access and why. As a result they are able to understand and address risks to the information and ensure that information they are responsible for is fully used within the law for the public good. Each IAO must manage information according to the Trust retention schedules which are set by either required legislation or best practice. Internal Audit may carry out records management reviews as part of the audit process and report results to the RMO where applicable.

6.1.8 The Trust Archivist is responsible for the selection care and preservation of valuable records held in the Trust Archives, and for providing access and supplementary information about these records.

6.2 Legislation

6.2.1 The management of West Dunbartonshire Leisure Trust's records is carried out in line with the following legislative, professional standards and codes of practice. Compliance with this policy will facilitate compliance with these Acts, standards and codes of practice:-

Legislation:

- Data Protection Act, 2018.
- General Data Protection Regulation (EU) 2016/679
- Environmental Information (Scotland) Regulations, 2004.
- Freedom of Information (Scotland) Act, 2002.
- Local Government (Scotland) Act 1994.
- Re-use of Public Sector Information Regulations, 2005.
- Public Records (Scotland) Act 2011.
- The Pupils' Educational Records (Scotland) Regulations 2003, SSI 2003 No 581.
- The approach must also be in line with the requirements of:-
- The Equality Act 2010
- Gender Recognition Act 2014
- The Human Rights Act 1988
- The Office of the Scottish Charity Regulator

6.3 Monitoring and Review

- 6.3.1 Compliance with this Policy and related standards and guidance will be monitored by the Records Management Officer in consultation with service representatives and the SIRO. Updates will be disseminated to all staff internally where applicable.
- 6.3.2 This policy will be reviewed every two years in order to take account of any new or changed legislation, professional standards, codes of practice or business practices

Title	Records Management Policy
Prepared By	Records Management Officer
Subject	Information classification and protective marking
Description	Provides guidance on creating, maintaining and disposal of corporate records within WDC and relevant partner organisations.
Reviewed By	Regulatory Services Senior Management
Published Location	Intranet
Classification	OFFICIAL
Review Frequency	Every 2 years