Information Governance Policy

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Introduction

Effective management and governance of information assets is vital to ensure that Tactran is efficient, transparent and accountable. All Tactran employees and Board members will ensure that our records and information are created, used, stored, shared and disposed of effectively.

This policy sets out the principles and practicalities to support Tactran colleagues in complying with our statutory obligations and ensuring we have high quality and appropriate information and records to support our decision making and provide assurance to our stakeholders.

Records Management Policy Statement

Effective records management is core to the transparent and robust delivery of services and all staff share responsibility for appropriately managing the Tactran documents and information with which they work. Tactran takes seriously our obligations under the Public Records(Scotland) Act 2011 and will implement improvements as identified in our Records Management Plan.

The Partnership Director has strategic responsibility for records management. Day-to-day implementation of effective records management is delegated to the Office Manager.

No staff member or contractor may alter, delete or edit a document which is not within their area of responsibility and for which they are authorised. No existing document may be altered without appropriate authority and just cause. Inappropriate or malicious alteration or deletion of Tactran data or documents may be considered as misconduct and therefore subject to disciplinary action.

All Tactran records will be stored on the appropriate folders in the networked shared drive. The folders will be structured in line with the Business Classification Scheme at the end of this policy. No documents or records should be held on PC or laptop hard drives (C: drives) other than working copies of documents temporarily held on laptops. These must be synchronised back to the network at the earliest opportunity.

The network shared drive is managed on our behalf by Perth and Kinross Council. Only Tactran staff will have access to the shared drive, and network accounts will be deleted as soon as a member of staff or contractor leaves Tactran.

In order to ensure the integrity of records, key document types will be converted from MS Word to PDF when they are finalised as follows:

Document type	Rendered as PDF
Outward correspondence	Final version as sent
Strategy, Plan and Policy documents	Agreed and implemented version
Reports	Final version as presented
Partnership Board and committee records	Minutes as approved by chair Papers as issued to Board and committee members

All Tactran policy documents and reports will use the appropriate templates and the relevant information will be entered in the document control panel at the front of each document. (The document control panel for this document can be seen at the front of the policy.)

Where appropriate versioning will be appended to document titles as follows: "<*Title*><V*n_n*>.doc". For example, "Information Governance Policy V 0_2.doc"

Where dates are included in document titles these shall be rendered in the international standard form YYYYMMDD.

Records will be deleted from the network at the end of their retention periods as set out in the Business Classification Scheme.

Convenience hard copies of documents are not considered as records. They should be securely shredded and recycled when no longer required.

Tactran records identified as being of enduring historical value will be deposited with the Perth and Kinross Council Archives for preservation.

For regulatory information, see the National Records of Scotland.

Data protection

Tactran is committed to protecting the personal data for which we are responsible in compliance with the Data Protection Act 1998 and the EU General Data Protection Regulation 2016.

We are registered in the ICO Register of Data Controllers and we have adopted and will comply with the Perth and Kinross Council Data Protection Policy.

The nature of Tactran's work is such that the personal data we process and hold is minimal. However, it is vital that we recognise and protect it. The following categories of personal data are held:

Personal data	Protection
Employee files	Kept locked in the Tactran office. Destroyed 6 years after staff leave.
Payroll data	Managed by PKC in a secure system.
Incidental personal data in consultation responses and correspondence	Ensure personal identifiers and contact details of members of the public are not inappropriately disclosed or shared.
Travel and expense claims	Kept on network folder. Destroyed six years after claim.

The Office Manager shall serve as data protection officer and respond to any queries or subject access requests.

For regulatory information, see the Information Commissioner's Office.

Freedom of Information

Transparency is at the heart of Tactran's work. We proactively publish key records including strategies, delivery plans, partnership board papers, policies and annual reports in line with our commitments in our publication scheme and Guide to Information.

We will also respond appropriately and as openly as possible to requests for information under the Freedom of Information (Scotland) Act 2002 and Environmental Information (Scotland) Regulations 2004.

We have adopted and apply the FOI procedures of Perth and Kinross Council.

The Office Manager must be informed promptly of any potential requests in order to ensure an appropriate and compliant response within 20 working days. The Office Manager will also track all requests and provide statistical returns to the Scottish Information Commissioner on a quarterly basis.

For regulatory information, see the Office of the Scottish Information Commissioner.

Business Continuity

Tactran does not offer critical or time-sensitive frontline services. Therefore, while we are conscious of the need for business resilience, our response is proportionate.

All our business systems, records and data are hosted by Perth and Kinross Council and fully backed-up.

In the event of our losing access to the office, losing access to utilities, or the office being destroyed by fire or flood, Tactran staff will be able either to temporarily relocate to a PKC office or work remotely from home if they have a PKC-issued laptop.

There are no unique hard copy records held in the office which need to be recovered in case of disaster.

All staff have out-of-hour contact numbers for colleagues to provide a “telephone tree” contact mechanism in case of disaster.

In addition, the Office Manager maintains out-of-hour contact details for key contacts in Perth and Kinross Council, including ICT and facilities.

For further advice see http://www.readyscotland.org/.

Information Security

Tactran is committed to protecting the Confidentiality, Integrity and Availability of our information assets. We source our ICT services (including network, data storage, software and hardware) through Perth and Kinross Council who manage our IT security and have Public Services Network accreditation.

The Council provides security controls including firewalls, anti-malware, software and server patching, back-up and PSN connectivity.

We have adopted and apply the Perth and Kinross Council information security policy.

In particular, Tactran staff must:

- Select hard to guess network passwords which are never shared or written down;
- Never download or install software without the permission of PKC IT;
- Not attempt to connect non-PKC issued devices to the network;
- Ensure that confidential documents are locked away when not in use;
- Be wary of emails from unknown sources which may carry malware or “phishing” attacks
- Always use the shredder for disposal of documents.

For more advice see the PKC Intranet information security page.

For advisory information see the National Cybersecurity Centre.

Tactran Business Classification Scheme and Retention Schedule (D= Destroy securely)

Strategy

- Final Strategy/ Delivery Plan (Record copy - Permanent - Transfer master copy to PKC Archives)
- Strategy working documents (Retain until next Refresh, D)
- Delivery Plan working documents (5 years, D)

Projects

- Project Mgmt templates and procedures (Superceded + 6 yrs, D)
- Project Files (non -European funded) (Termination + 6 years, D)
- Project Files (European funded) (Termination + 10 years, D)

Governance

- Partnership Board Meetings (Permanent - Transfer master set of Board Papers to PKC Archives)
- Board Member Recruitment (Successful applications to File, Unsuccessful, 6 Mths D) PERSONAL DATA
- Governance schemes: standing orders, scheme of delegation, Code of Conduct, financial regs (Superceded + 5 yrs, D)
- Committee and liaison group meetings (5 years, D)
- Consultation responses (5 years, D) INCLUDES PERSONAL DATA
- Publications (Record sample of each publication -Permanent. Transfer master copy to PKC Archives, Working files 2yrs, D)
- Compliance (FOI, PSRA, Equalities, Enviro Impact) (2 years, D)

Administration

- HR Recruitment (Successful applications to Personnel File, Unsuccessful, 6 mths D) PERSONAL DATA
- HR Personnel File (Termination + 6 years, D) PERSONAL DATA
- Policies and procedures (Superceded + 5 years, D)
- Facilities Management (5 years, D)

Finance

- Procurement (Award + 6 years, D)
- Purchasing (Current Financial Year + 6 years, D)
- Grant in Aid (Current Financial Year + 6 years, D)
- Budget (Current Financial Year + 2 years, D)
- Travel claims (Current Financial Year + 6 years, D) INCLUDES PERSONAL DATA
- Payroll (Managed by PKC) (Current + 6 years, D) INCLUDES PERSONAL DATA