



**Records Management Plan
under the
Public Records (Scotland) Act 2011**

December 2016

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1. Introduction

The Public Records (Scotland) Act 2011 requires that public authorities subject to the Act must submit a Records Management Plan for agreement by the Keeper of the Records of Scotland, and thereafter manage its records in accordance with the plan. This Records Management Plan (RMP) seeks to demonstrate the commitment of Tactran to comply with that act and to improve our management of records and information in support of our business aims.

It was approved by the Tactran Partnership Board on 6 December 2016 and has the full support of Eric Guthrie, Partnership Director, and all Tactran officers.

2. Context

Tactran is one of seven statutory Regional Transport Partnerships covering the whole of Scotland, which were created under the Transport (Scotland) Act 2005.

The Tactran region forms an important "hub" lying at the heart of Scotland's transport network and includes the local authority areas of Angus, Dundee City, Perth & Kinross and Stirling which together make up just under 10% of Scotland's land mass and nearly 12% of the nation's population.

The primary purpose of the Partnership is to develop a Regional Transport Strategy setting out a vision for the medium to long term future of transport in the area and to oversee its implementation.

Tactran is a small organisation (six employees) operating from a single office. Our compliance with the Public Records (Scotland) Act 2011 takes account of this and aims to be proportionate in approach.

Moreover, Tactran holds minimal personal or other sensitive data, and most of our key records are routinely published.

Tactran works closely with Perth and Kinross Council (PKC). The Partnership Board and Executive Team are supported and advised by 3 Proper Officers who provide Administration and Governance, Financial and Legal support under a Service Level Agreement with Perth & Kinross Council. (Secretary – Gillian Taylor, Head of Democratic Services, Perth & Kinross Council; Treasurer – Scott Walker, Chief Accountant, Perth & Kinross Council; Legal Officer – Lisa Simpson, Head of Legal Services, Perth & Kinross Council).

Our ICT (network, storage, software, hardware) and payroll functions are also outsourced to PKC.

This close working arrangement is reflected in our Records Management Plan in that there are significant areas of overlap with the Council's information management policies and procedures.

This RMP will therefore include cross-references (highlighted in pink) to evidence from the Perth & Kinross Council RMP already approved by the Keeper of the Records of Scotland.

3. The Records Management Plan

| RMP Element Description | Tactran Statement | Evidence | Action plan |
|---|--|---|--|
| <p><i>Element 1: Senior management responsibility:</i></p> <p>Identify an individual at senior level who has overall strategic accountability for records management.</p> <p>Read further explanation and guidance about element 1 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement1.asp</p> | <p>Eric Guthrie, Partnership Director, has strategic accountability for Tactran's governance arrangements including records management and compliance with the PRSA.</p> | <p>Tactran Information Governance Policy</p> <p>RMP Covering letter</p> | <p>None</p> |
| <p><i>Element 2: Records manager responsibility:</i></p> <p>Identify individual within the authority, answerable to senior management, to have day-to-day operational responsibility for records management within the authority.</p> <p>Read further explanation and guidance about element 2 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement2.asp</p> | <p>The Tactran colleague with day-to-day responsibility for records management is:</p> <p>Ashley Roger Office Manager / PA to Director Tactran Bordeaux House, 31 Kinnoull Street, Perth PH1 5EN 01738 475775 AshleyRoger@tactran.gov.uk</p> | <p>Tactran Information Governance Policy</p> <p>RMP Covering letter</p> | <p>None</p> |
| <p><i>Element 3: Records management policy statement:</i></p> <p>A records management policy statement underpins effective management of an authority's records and information. It demonstrates to employees and stakeholders that managing records is important to the authority and serves as a mandate for the activities of the records manager.</p> | <p>Tactran adopted our Information Governance Policy at the Partnership Board meeting in December 2016. This includes a clear policy commitment on records management and mandates the work of the Office Manager</p> | <p>Tactran Information Governance Policy</p> <p>Minutes of Partnership Board meeting, December 2016</p> <p>Link to website showing Information Governance</p> | <p>Include Information Governance Policy in regular review of governance documentation. December 2018 onwards.</p> |

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| <p>Read further explanation and guidance about element 3 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement3.asp</p> | <p>in implementing effective and proportionate records management.</p> <p>The Information Governance policy has been added to our suite of governance documentation, available to all staff and to the public.</p> | <p>Policy among governance documentation.</p> | |
| <p><i>Element 4: Business classification</i></p> <p><i>A business classification scheme describes what business activities the authority undertakes – whether alone or in partnership.</i></p> <p>Read further explanation and guidance about element 4 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement4.asp</p> | <p>Tactran has adopted the business classification scheme as part of its records management policy. It provides the structure for the Tactran shared drive folders and is available to all staff in a shared folder for Information Governance resources.</p> | <p>Tactran Information Governance Policy - BCS and retention schedule</p> <p>Screen shots of Tactran shared drive</p> | |
| <p><i>Element 5: Retention schedules</i></p> <p><i>A retention schedule is a list of records for which pre-determined disposal dates have been established.</i></p> <p>Read further explanation and guidance about element 5 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement5.asp</p> | <p>Tactran has adopted the retention periods identified within the business classification scheme, drawing on the Scottish Council on Archives Records Retention Schedule Resource.</p> | <p>Tactran Information Governance Policy - BCS and retention schedule</p> | |

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| <p><i>Element 6: Destruction arrangements</i></p> <p><i>It is not always cost-effective or practical for an authority to securely destroy records in-house. Many authorities engage a contractor to destroy records and ensure the process is supervised and documented.</i></p> <p>An authority's RMP <u>must</u> demonstrate that proper destruction arrangements are in place.</p> <p>Read further explanation and guidance about element 6 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement6.asp</p> | <p>Perth and Kinross Council provides Tactran ICT hardware and also manages its appropriate disposal. Destruction of Tactran PCs, laptops, removable media and server hard drives are managed by PKC in line with their information security procedures.</p> <p>Tactran generates a relatively small volume of paper documents. Confidential disposal of paper documents and records is carried out in-house through the use of a Fellowes Powershred 79Ci shredder. As the hard copies are not considered to be records, we do not maintain a log of shredded documents.</p> | <p>Tactran Information Governance Policy</p> <p>Shredder user manual covering page</p> <p>PKC Evidence item no.6: Information Security Policy: secure disposal of confidential waste documents</p> <p>PKC Evidence item no.7: Copy contract for the secure disposal of confidential waste.</p> <p>I can confirm Tactran does not engage a third party supplier to store paper records.</p> | <p>Implement deletion of time-expired records from the Shared Drive in line with the BCS and Retention Schedule: April 2017</p> |
| <p><i>Element 7: Archiving and transfer arrangements</i></p> <p><i>This is the mechanism by which an authority transfers records of enduring value to an appropriate archive repository, specifying the timing of transfers and other terms and conditions.</i></p> | <p>Tactran has agreement in principle to transfer core historical records to Perth and Kinross Council Archive.</p> | <p>Email exchange with PKC Archive</p> | <p>Transfer initial deposit of archival records with PKC Archive in January 2017.</p> <p>Commence regular transfer every 2 years thereafter.</p> |

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| <p>Read further explanation and guidance about element 7 - <u>http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement7.asp</u></p> | | | |
| <p><i>Element 8: Information security</i></p> <p>Information security is the process by which an authority protects its records and ensures they remain available. It is the means by which an authority guards against unauthorised access and provides for the integrity of the records. Robust information security measures are an acknowledgement that records represent a risk as well as an asset. A public authority should have procedures in place to assess and contain that risk.</p> <p>Section 1(2)(b)(ii) of the Act specifically requires a RMP to make provision about the archiving and destruction or other disposal of the authority's public records.</p> <p>An authority's RMP <u>must</u> make provision for the proper level of security for its public records.</p> <p>Read further explanation and guidance about element 8 - <u>http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement8.asp</u></p> | <p>The Tactran ICT function is provided by Perth and Kinross Council. Tactran is subject to the information security function and policies of the Council.</p> <p>The Tactran network storage is managed by PKC using Windows Server 2012. User access is restricted to the six Tactran employees.</p> <p>Tactran has adopted and is subject to PKC information security policy and procedures. These are available to all colleagues via the PKC intranet to which all Tactran employees have access.</p> | <p>ICT Service level agreement with PKC</p> <p>Tactran Information Governance Policy</p> <p>Screenshot of PKC Intranet</p> <p>PKC Evidence item no.6: Council Information Security Policy;</p> <p>PKC Evidence item no.9: copy PSN accreditation certificate.</p> | <p>The Office Manager to provide awareness raising for colleagues through team briefings and posters.</p> |
| <p><i>Element 9: Data protection</i></p> <p>An authority that handles personal information about individuals has a number of legal obligations to protect that information under the Data Protection Act 1998.</p> <p>The Keeper will expect an authority's RMP to indicate compliance</p> | <p>Tactran processes very little personal data and has adopted and is subject to the PKC Data Protection policy. These are available to all colleagues via the PKC intranet to which all</p> | <p>Tactran Information Governance Policy</p> <p>PKC Data Protection Policy</p> <p>Tactran entry in the ICO</p> | <p>The Office Manager to keep under review amendments to the PKC Data Protection Policy and procedures arising from the EU General Data Protection Regulation 2016.</p> |

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| <p>with its data protection obligations. This might be a high level statement of public responsibility and fair processing.</p> <p>If an authority holds and process information about stakeholders, clients, employees or suppliers, it is legally obliged to protect that information. Under the Data Protection Act, an authority must only collect information needed for a specific business purpose, it must keep it secure and ensure it remains relevant and up to date. The authority <u>must</u> also only hold as much information as is needed for business purposes and only for as long as it is needed. The person who is the subject of the information <u>must</u> be afforded access to it on request.</p> <p>Read further explanation and guidance about element 9 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement9.asp</p> | <p>Tactran employees have access.</p> | <p>Register of Data Controllers</p> | |
| <p><i>Element 10: Business continuity and vital records</i></p> <p><i>A business continuity and vital records plan serves as the main resource for the preparation for, response to, and recovery from, an emergency that might affect any number of crucial functions in an authority.</i></p> <p>The Keeper will expect an authority's RMP to indicate arrangements in support of records vital to business continuity. Certain records held by authorities are vital to their function. These might include insurance details, current contract information, master personnel files, case files, etc. The RMP will support reasonable procedures for these records to be accessible in the event of an emergency affecting their premises or systems.</p> <p>Authorities should therefore have appropriate business continuity plans ensuring that the critical business activities referred to in their vital records will be able to continue in the event of a disaster. How each authority does this is for them to determine in light of their</p> | <p>All Tactran records are held on the PKC network servers and fully backed up.</p> <p>None of the hard-copy files at the Tactran office are records or unique. Were the office to suffer catastrophic loss, Tactran staff would simply temporarily locate to PKC office accommodation or work remotely until new arrangements could be made.</p> <p>Tactran staff have a "telephone tree" in place for out-of-hours</p> | <p>Tactran Information Governance Policy</p> <p>ICT Service Level Agreement with PKC</p> <p>PKC Evidence item no.6: Information Security Policy: secure disposal of confidential waste documents</p> <p>PKC Evidence item no.12: statement and infographic regarding Council server back-up procedure.</p> | <p>None</p> |

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| <p>business needs, but the plan should point to it.</p> <p>Read further explanation and guidance about element 10 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement10.asp</p> | <p>emergency contact.</p> | | |
| <p><i>Element 11: Audit trail</i></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.</p> <p>The Keeper will expect an authority's RMP to provide evidence that the authority maintains a complete and accurate representation of all changes that occur in relation to a particular record. For the purpose of this plan 'changes' can be taken to include movement of a record even if the information content is unaffected. Audit trail information must be kept for at least as long as the record to which it relates.</p> <p>This audit trail can be held separately from or as an integral part of the record. It may be generated automatically, or it may be created manually.</p> <p>Read further explanation and guidance about element 11 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement11.asp</p> | <p>All Tactran records are held on the shared drive hosted by Perth and Kinross Council. As the file share is only available to the six Tactran staff, the risk of inappropriate access to or tampering with records is judged to be very low.</p> <p>Moreover, staff are explicitly made aware of their obligations to maintain appropriate records and not to make unauthorized additions to Tactran records.</p> <p>Key records are converted to PDF once finalised and most are immediately published online.</p> <p>Further measures to protect the integrity of Tactran documents and records are included in the</p> | <p>Link to Tactran website listing staff</p> <p>ICT Service Level Agreement with PKC</p> <p>PKC Evidence item no.6: Council Information Security Policy</p> <p>Tactran Information Governance Policy</p> | <p>Keep under review future business case for implementation of electronic records management in partnership with Perth and Kinross Council.</p> <p>Templates for policies, reports and other key documents to be updated to include document control information.</p> |

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| | <p>Information Governance Policy.</p> <p>Given our small size and low risk, Tactran has neither the resource nor identified resource to implement electronic records management systems in the foreseeable future. However, in partnership with PKC, we shall keep this situation under review.</p> | | |
| <p><i>Element 12: Competency framework for records management staff</i></p> <p><i>A competency framework lists the core competencies and the key knowledge and skills required by a records manager. It can be used as a basis for developing job specifications, identifying training needs, and assessing performance.</i></p> <p>The Keeper will expect an authority's RMP to detail a competency framework for person(s) designated as responsible for the day-to-day operation of activities described in the elements in the authority's RMP. It is important that authorities understand that records management is best implemented by a person or persons possessing the relevant skills.</p> <p>Read further explanation and guidance about element 12 - <u>http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement12.asp</u></p> | <p>As designated Records Manager, Ashley Roger has engaged with available learning opportunities on PRSA and will continue to do so. This has included:</p> <ul style="list-style-type: none"> • Attendance at the PRSA Roadshow in Perth, 20 Sep 2012 • Meeting with Pete Wadley of NRS PRSA Team, Sep 2015 • Participation in Transport Partnerships PRSA workshop, Jan 2016 | <p>Certificate: Transport Partnerships PRSA Training Session Jan 2016</p> <p>Tactran Information Governance Policy</p> | <p>The Office Manager, with the support of the Partnership Director, will continue to seek cost-effective and proportionate opportunities to develop skills and knowledge in records management and other aspects of information governance.</p> |

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| | <p>The Office Manager also seeks advice from the PKC Records Manager, as appropriate.</p> <p>Support for appropriate training for the role is mandated under the Information Governance Policy.</p> | | |
| <p><i>Element 13: Assessment and review</i></p> <p>Regular self-assessment and review of records management systems will give an authority a clear statement of the extent that its records management practices conform to the Records Management Plan as submitted and agreed by the Keeper.</p> <p>Section 1(5)(i)(a) of the Act says that an authority must keep its RMP under review. An authority's RMP <u>must</u> describe the procedures in place to regularly review it in the future.</p> <p>Read further explanation and guidance about element 13 - <u>http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement13.asp</u></p> | <p>The Tactran Records Management Plan and Information Governance Policy form part of our Governance Documents and are subject to bi-annual review.</p> <p>The Partnership Board will receive an annual update on the implementation of the Information Governance Policy and Records Management Plan.</p> | <p>This Records Management Plan</p> <p>Information Governance Policy</p> <p>Minutes of Partnership Board December 2016</p> | <p>Present an annual Information Governance statement (including progress against this RMP) to Partnership Board from December 2017 onwards.</p> <p>Present Records Management Plan for review by Partnership Board in December 2018.</p> |
| <p><i>Element 14: Shared Information</i></p> <p>Under certain conditions, information given in confidence may be shared. Most commonly this relates to personal information, but it can also happen with confidential corporate records.</p> <p>The Keeper will expect an authority's RMP to reflect its procedures for sharing information. Authorities who share, or are planning to</p> | <p>Information shared with and by Tactran is characteristically open and non-sensitive.</p> <p>Where appropriate, we will comply with the reasonable</p> | <p>Tactran Guide to Information Regional Transport Partnerships (Establishment, Constitution and Membership)</p> | <p>None</p> |

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| <p>share, information must provide evidence that they have considered the implications of information sharing on good records management. Information sharing protocols act as high level statements of principles on sharing and associated issues, and provide general guidance to staff on sharing information or disclosing it to another party.</p> <p>Read further explanation and guidance about element 14 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement14.asp</p> | <p>confidentiality requirements of third parties, but such circumstances are rare.</p> <p>Tactran does not engage in any information sharing which would require information sharing protocols.</p> <p>Our core records and information are publicly shared as a statutory requirement.</p> | <p>(Scotland) Order 2005</p> <p>Transport (Scotland) Act 2005, especially sections 6 and 14</p> | |

4. Statement of endorsement

I endorse the Tactran Information Governance Policy and the above Records Management Plan.

Signed: 

Date: 30th January 2017

Eric Guthrie
Partnership Director
Tactran

5. List of evidence

- Tactran Information Governance Policy
- RMP Covering letter
- Minutes of Partnership Board meeting, December 2016
- Link to [website](#) showing Information Governance Policy among governance documentation.
- BCS and retention schedule
- Screen shots of Tactran shared drive
- Shredder user manual covering page
- PKC Evidence item no.6: Information Security Policy: secure disposal of confidential waste documents
- PKC Evidence item no.7: Copy contract for the secure disposal of confidential waste.
- Email exchange with PKC Archive
- ICT Service level agreement with PKC
- Screenshot of PKC Intranet
- PKC Evidence item no.9: copy PSN accreditation certificate.
- [PKC Data Protection Policy](#)
- [Tactran entry in the ICO Register of Data Controllers](#)
- PKC Evidence item no.12: statement and infographic regarding Council server back-up procedure.
- [Link to Tactran website listing staff](#)
- Certificate: Transport Partnerships PRSA Training Session Jan 2016
- Tactran [Guide to Information](#)
- [Regional Transport Partnerships \(Establishment, Constitution and Membership\) \(Scotland\) Order 2005](#)
- [Transport \(Scotland\) Act 2005](#), especially sections 6 and 14