



# **Scottish Prison Service Records Management Plan**

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## Table of Contents

Scottish Prison Service Records Management Plan .....	1
1. Summary .....	1
2. The Public Records (Scotland) Act 2011 .....	1
3. Scottish Prison Service .....	1
4. SPS Records Management.....	1
5. Records Management Maturity Model .....	2
Element 1: Senior management responsibility:.....	3
Element 2: Records manager responsibility: .....	4
Element 3: Records management policy statement: .....	5
Element 4: Business classification.....	6
Element 5: Retention schedules .....	7
Element 6: Destruction arrangements .....	8
Element 7: Archiving and transfer arrangements .....	9
Element 8: Information Security .....	10
Element 9: Data protection .....	11
Element 10: Business continuity and vital records .....	12
Element 11: Audit trail.....	13
Element 12: Competency framework for records management staff.....	14
Element 13: Assessment and review .....	15
Element 14: Shared Information.....	16
Appendix: Summary of SPS Records Management Maturity Model as at January 2014 ...	17

# Scottish Prison Service Records Management Plan

## 1. Summary

The Scottish Prison Service (SPS) is fully committed to compliance with the requirements of the Public Records (Scotland) Act 2011, which came into force on 1st January 2013. SPS will follow procedures that aim to ensure that all employees, contractors, agents, consultants and other trusted third parties who have access to any information held within SPS, are fully aware of and abide by their duties under the Act.

## 2. The Public Records (Scotland) Act 2011

The Public Records (Scotland) Act 2011 (the Act) requires the Scottish Government to submit a records management plan (RMP) to be agreed by the Keeper of the Records of Scotland. Although SPS is not specifically identified in the Act, as an Agency of the Scottish Government SPS is required to provide a Records Management Plan to be included as part of the Scottish Government Records Management Plan.

This document is the Scottish Prison Service Records Management Plan which is to be submitted to the Keeper of the Records of Scotland as part of the Scottish Government Records Management Plan.

## 3. Scottish Prison Service

SPS is an Agency of the Scottish Government and was established in 1993. The purpose of SPS is to maintain secure custody and good order within prisons, whilst caring for prisoners with humanity and delivering opportunities which give the best chance to reduce reoffending once a prisoner returns to the community. SPS has 14 publicly managed prisons and 2 privately managed prisons.

## 4. SPS Records Management

The Scottish Prison Service Records Management Plan outlines the current position of records management in SPS together with proposed actions for improvement. It is important to recognise that records management in SPS is in the early stages of a process of considerable change. Over the next few years SPS records management policies, processes and procedures will be completely overhauled and improved and SPS will move from its current position where the majority of records and processes are paper based to a more effective system where records are created and managed electronically.

In 2012, SPS carried out a review of its records management procedures. The review came about partly as a result of the Public Records (Scotland) Act and partly because of a general recognition that improved records management would provide substantial benefits to SPS. The review highlighted that although current records management procedures in SPS were effective at a local level, there was a lack of corporate policies, procedures were inconsistent across the organisation and there was no dedicated records management governance structure in place.

As a result of this review, SPS has put the following in place:

- Identification of a Director to have strategic accountability for records management;
- Appointment of a senior manager as Head of Records Management to have day-to-day operational responsibility for records management throughout SPS;
- A number of key projects have commenced:
  - **Prisoner Records Management Project** – to convert paper based prisoner records processes to electronic; dispose of all prisoner paper records; and appoint and train records managers throughout SPS;

- **SharePoint 2013 Project** – to develop a new Intranet for SPS staff with built in file structures, document retention periods and access rights;
- **eHR Project** – to provide an improved electronic system for managing staff HR records which would allow staff to keep their own records up to date;
- **eProcurement Project** – to provide an electronic system for managing the procurement process.
- Other projects which have been proposed include:
  - **Prisoner Database (PR2) Project** – to develop PR2 to be the interface to access all prisoner records electronically;
  - **Non-Prisoner Records Management Project** – to review and develop policies and governance for non-prisoner records including HR, training, finance, procurement and estates.
  - **SPS Policies Project** – to develop a process for communicating SPS policies, procedures and guidance consistently to staff.

Taken together these projects will very substantially improve the way that SPS manages its records. Once these projects have been implemented, SPS will be in a position to ensure that all of its records are managed effectively, efficiently and consistently.

## 5. Records Management Maturity Model

In order to help assess the current state of records management, SPS has completed a Records Management Maturity Model (see Appendix). The Maturity Model aims to give an accurate, reliable and honest summary of the current level of maturity of records management measures.

The model helps with:

- Identifying and providing evidence of good practice in records management.
- Providing evidence of compliance with the Freedom of Information (Scotland) Act and its Code of Practice.
- Identifying gaps and areas of weaknesses which may require improvement.
- Measuring the extent to which records management is regarded as an operational and strategic priority.

The model provides statements summarising four levels of maturity against 33 aspects of what constitutes a records management programme designed for ensuring compliance with FOI.

Currently, for most of the measures, records management in SPS lies somewhere between:

- 1 Aware (uncoordinated local attempts to improve records management in response to local issues); and
- 2 Defined (coordinated attempts to improve records management underway across the organisation).

Once the proposed activities have been completed, it is expected that most measures of records management in SPS will have moved to level 3 Embedded where effective management of records is fully integrated within SPS strategic and operational activities.



Catherine Topley  
 Director of Corporate Services and  
 Senior Information Risk Owner

RMP Element Description	Scottish Prison Service Statement	Evidence	Action Plan
<p><b>Element 1: Senior management responsibility:</b></p> <p><i>Identify an individual at senior level who has overall strategic accountability for records management.</i></p> <p>Section 1(2)(a)(i) of the Act specifically requires a RMP to identify the individual responsible for the management of the authority’s public records. An authority’s RMP <u>must</u> name and provide the job title of the senior manager who accepts overall responsibility for the RMP that has been submitted.</p> <p>It is vital that the RMP submitted by an authority has the approval and support of that authority’s senior management team. Where an authority has already appointed a Senior Information Risk Owner, or similar person, they should consider making that person responsible for the records management programme. It is essential that the authority identifies and seeks the agreement of a senior post-holder to take overall responsibility for records management. That person is unlikely to have a day-to-day role in implementing the RMP, although they are not prohibited from doing so.</p> <p>As evidence, the RMP could include, for example, a covering letter signed by the senior post-holder. In this letter the responsible person named should indicate that they endorse the authority’s record management policy (See Element 3).</p> <p><a href="http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement1.asp">Read further explanation and guidance about element 1 - <u>http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement1.asp</u></a></p>	<p>Catherine Topley, Director of Corporate Services, has senior responsibility for all aspects of Records Management in SPS, and is the corporate owner of the SPS Records Management Plan.</p> <p>Catherine Topley is also the Senior Information Risk Owner (SIRO) for the Scottish Prison Service.</p>	<p>E01: Records Management Policy Statement</p> <p>E02: Appointment and Responsibilities of the SIRO</p>	<p>No further action required.</p>

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<p><b>Element 2: Records manager responsibility:</b></p> <p><i>Identify individual within the authority, answerable to senior management, to have day-to-day operational responsibility for records management within the authority.</i></p> <p>Section 1(2) (a)(ii) of the Act specifically requires a RMP to identify the individual responsible for ensuring the authority complies with its plan. An authority's RMP <u>must</u> name and provide the job title of the person responsible for the day-to-day operation of activities described in the elements in the authority's RMP. This person should be the Keeper's initial point of contact for records management issues. It is essential that an individual has overall day-to-day responsibility for the <u>implementation</u> of an authority's RMP. There may already be a designated person who carries out this role. If not, the authority will need to make an appointment. As with element 1 above, the RMP must name an individual rather than simply a job title. It should be noted that staff changes will not invalidate any submitted plan provided that the all records management responsibilities are transferred to the incoming post holder and relevant training is undertaken. This individual might not work directly for the scheduled authority. It is possible that an authority may contract out their records management service. If this is the case an authority may not be in a position to provide the name of those responsible for the day-to-day operation of this element. The authority must give details of the arrangements in place and name the body appointed to carry out the records management function on its behalf. It may be the case that an authority's records management programme has been developed by a third party. It is the person operating the programme on a day-to-day basis whose name should be submitted.</p> <p><a href="http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement2.asp">Read further explanation and guidance about element 2 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement2.asp</a></p>	<p>Allan Anderson, Head of Records Management, has responsibility for day-to-day implementation of all SPS records management activities described in the SPS Records Management Plan.</p> <p>Allan Anderson owns all the Actions identified in the Action Plan section of this document.</p>	<p>E01: Records Management Policy Statement</p> <p>E03: Job Description for Head of Records Management</p>	<p>No further action required</p>

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<p><b>Element 3: Records management policy statement:</b></p> <p><i>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.</i></p> <p>The Keeper expects each authority's plan to include a records management policy statement. The policy statement should describe how the authority creates and manages authentic, reliable and useable records, capable of supporting business functions and activities for as long as they are required. The policy statement should be made available to all staff, at all levels in the authority. The statement will properly reflect the business functions of the public authority. The Keeper will expect authorities with a wide range of functions operating in a complex legislative environment to develop a fuller statement than a smaller authority. The records management statement should define the legislative, regulatory and best practice framework, within which the authority operates and give an overview of the records management processes and systems within the authority and describe how these support the authority in carrying out its business effectively. For electronic records the statement should describe how metadata is created and maintained. It should be clear that the authority understands what is required to operate an effective records management system which embraces records in all formats.</p> <p>The records management statement should include a description of the mechanism for records management issues being disseminated through the authority and confirmation that regular reporting on these issues is made to the main governance bodies. The statement should have senior management approval and evidence, such as a minute of the management board recording its approval, submitted to the Keeper. The other elements in the RMP, listed below, will help provide the Keeper with evidence that the authority is fulfilling its policy.</p> <p><a href="http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement3.asp">Read further explanation and guidance about element 3 –  http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement3.asp</a></p>	<p>The Scottish Prison Service is committed to a systematic and planned approach to the management of records within the organisation, from their creation to their ultimate disposal or archive. This approach will ensure that the Scottish Prison Service can:</p> <ul style="list-style-type: none"> <li>• Control the quality, quantity and security of the information that it generates;</li> <li>• Maintain the information in an effective manner whilst ensuring compliance with legislative requirements</li> </ul> <p>A Records Management Policy Statement, reflective of the current and future record keeping arrangements in the Scottish Prison Service has been developed. This Policy Statement has been approved by Catherine Topley, the Senior Information Risk Owner in the Scottish Prison Service</p>	<p>E01: Records Management Policy Statement</p>	<p>The Chief Executive and the Board of Directors will be asked to approve the Records Management Policy Statement.</p> <p>Once approved the Policy Statement will be issued to all staff.</p>

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<p><b>Element 4: Business classification</b></p> <p><b><i>A business classification scheme describes what business activities the authority undertakes – whether alone or in partnership.</i></b></p> <p>The Keeper expects an authority to have properly considered business classification mechanisms and its RMP should therefore reflect the functions of the authority by means of a business classification scheme or similar.</p> <p>A business classification scheme usually takes the form of a hierarchical model or structure diagram. It records, at a given point in time, the informational assets the business creates and maintains, and in which function or service area they are held. As authorities change the scheme should be regularly reviewed and updated.</p> <p>A business classification scheme allows an authority to map its functions and provides a structure for operating a disposal schedule effectively.</p> <p>Some authorities will have completed this exercise already, but others may not. Creating the first business classification scheme can be a time-consuming process, particularly if an authority is complex, as it involves an information audit to be undertaken. It will necessarily involve the cooperation and collaboration of several colleagues and management within the authority, but without it the authority cannot show that it has a full understanding or effective control of the information it keeps.</p> <p>Although each authority is managed uniquely there is an opportunity for colleagues, particularly within the same sector, to share knowledge and experience to prevent duplication of effort.</p> <p>All of the records an authority creates should be managed within a single business classification scheme, even if it is using more than one record system to manage its records. An authority will need to demonstrate that its business classification scheme can be applied to the record systems which it operates.</p> <p><a href="http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement4.asp">Read further explanation and guidance about element 4 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement4.asp</a></p>	<p>Currently each function within SPS has its own Business Classification Scheme. These separate Business Classification Schemes have been brought together into a single corporate SPS Business Classification Scheme.</p> <p>The SPS Business Classification Scheme provides the framework for managing all records and information within SPS and will be the keystone of the records management function within the Scottish Prison Service.</p> <p>The SPS Business Classification Scheme has three levels of classification, based on function, activity and process.</p>	<p>E04: Business Classification Scheme</p>	<p>The SPS Business Classification Scheme will be developed in conjunction with management and staff throughout SPS to ensure it accurately reflects how SPS organises and manages its records.</p>

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<p><b>Element 5: Retention schedules</b>  <b><i>A retention schedule is a list of records for which pre-determined disposal dates have been established.</i></b></p> <p>Section 1(2) (b)(iii) of the Act specifically requires a RMP to include provision about the archiving and destruction or other disposal of the authority’s public records.</p> <p>An authority’s RMP <u>must</u> demonstrate the existence of and adherence to corporate records retention procedures. The procedures should incorporate retention schedules and should detail the procedures that the authority follows to ensure records are routinely assigned disposal dates, that they are subsequently destroyed by a secure mechanism (see element 6) at the appropriate time, or preserved permanently by transfer to an approved repository or digital preservation programme (See element 7).</p> <p>The principal reasons for creating retention schedules are:</p> <ul style="list-style-type: none"> <li>• to ensure records are kept for as long as they are needed and then disposed of appropriately</li> <li>• to ensure all legitimate considerations and future uses are considered in reaching the final decision.</li> <li>• to provide clarity as to which records are still held by an authority and which have been deliberately destroyed.</li> </ul> <p>“Disposal” in this context does not necessarily mean destruction. It includes any action taken at the agreed disposal or review date including migration to another format and transfer to a permanent archive.</p> <p>A retention schedule is an important tool for proper records management. Authorities who do not yet have a full retention schedule in place should show evidence that the importance of such a schedule is acknowledged by the senior person responsible for records management in an authority (see element 1). This might be done as part of the policy document (element 3). It should also be made clear that the authority has a retention schedule in development.</p> <p>An authority’s RMP <u>must</u> demonstrate the principle that retention rules are consistently applied across all of an authority’s record systems.</p> <p><a href="http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement5.asp">Read further explanation and guidance about element 5_</a>  <a href="http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement5.asp">http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement5.asp</a></p>	<p>An SPS Records Retention Schedule has been prepared by bringing together the various records retention policies that currently exist within SPS. In some areas well developed and effective retention policies already exist – e.g. HR and Finance; in some areas existing retention policies need to be further developed to become more effective – e.g. Prisoner Records; and in other areas there are no clear records retention policies – e.g. Communications and ICT.</p> <p>SPS will develop and implement a detailed corporate Records Retention Schedule and Policies based on the key record types held by the organisation – both paper and electronic.</p> <p>Recommended minimum retention periods will be defined in line with statutory and legislative obligations and business needs.</p>	<p>E05: Records Creation and Maintenance Guidance</p> <p>E06: Records Closure Guidance</p> <p>E07: Records Retention Overview</p> <p>E08: Records Retention Schedule</p>	<p>The Records Management project team will work with management and staff throughout SPS to develop a detailed corporate Records Retention Schedule and Policies.</p>

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<p><b>Element 6: Destruction arrangements</b>  <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>Section 1(2) (b)(iii) of the Act specifically requires a RMP to include provision about the archiving and destruction, or other disposal, of an authority’s public records.</p> <p>An authority’s RMP <u>must</u> demonstrate that proper destruction arrangements are in place.</p> <p>A retention schedule, on its own, will not be considered adequate proof of disposal for the Keeper to agree a RMP. It must be linked with details of an authority’s destruction arrangements. These should demonstrate security precautions appropriate to the sensitivity of the records. Disposal arrangements must also ensure that all copies of a record – wherever stored – are identified and destroyed.</p> <p><a href="http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement6.asp">Read further explanation and guidance about element 6 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement6.asp</a></p>	<p>SPS staff are required to shred paper documents as soon as they are no longer required and shredders are available throughout the organisation for this purpose.</p> <p>For large volume shredding SPS uses Shred-It to carry out on-site shredding <a href="http://www.shredit.co.uk">http://www.shredit.co.uk</a>.</p> <p>The Registry Team keeps records of all policy documents that are destroyed or transferred to Scottish Government for archiving.</p> <p>SPS has commenced a project to convert all prisoner record paper processes into electronic processes and to dispose of all paper prisoner records. Once all prisoner records are stored electronically, retention and deletion arrangements will be built into the electronic system and deletion will happen automatically.</p>	<p>E05: Records Creation and Maintenance Guidance</p> <p>E06: Records Closure Guidance</p> <p>E09: GMA 10A-12 Disposal of Documents and IT Equipment</p> <p>E10: Infoflash 2 Secure Destruction of Sensitive Personal Information</p>	<p>A system for recording which records have been destroyed and when will be developed and implemented.</p> <p>Prisoner record management processes will be converted from paper to electronic and existing paper records will be disposed of.</p>

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<p><b>Element 7: Archiving and transfer arrangements</b>  <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>Section 1(2)(b)(iii) of the Act specifically requires a RMP to make provision about the archiving and destruction, or other disposal, of an authority's public records.</p> <p>An authority's RMP <u>must</u> detail its archiving and transfer arrangements and ensure that records of enduring value are deposited in an appropriate archive repository. The RMP will detail how custody of the records will transfer from the operational side of the authority to either an in-house archive, if that facility exists, or another suitable repository, which <u>must</u> be named. The person responsible for the archive should also be cited.</p> <p>Some records continue to have value beyond their active business use and may be selected for permanent preservation. The authority's RMP <u>must</u> show that it has a mechanism in place for dealing with records identified as being suitable for permanent preservation. This mechanism will be informed by the authority's retention schedule which should identify records of enduring corporate and legal value. An authority should also consider how records of historical, cultural and research value will be identified if this has not already been done in the retention schedule. The format/media in which they are to be permanently maintained should be noted as this will determine the appropriate management regime.</p> <p><a href="http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement7.asp">Read further explanation and guidance about element 7- http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement7.asp</a></p>	<p>Scottish Government is responsible for deciding which government records should be transferred to the National Records of Scotland (NRS) for permanent preservation. This includes SPS records.</p> <p>SPS records identified as being of historical interest are transferred to Scottish Government who then decide whether to transfer the records to the National Records of Scotland for permanent preservation.</p>	<p>E11: Archiving Guidance</p> <p>E12: Scottish Government Policy for Transferring Records to National Archives</p>	<p>Discussions will be held with Scottish Government and NRS to ensure that SPS is transferring the appropriate records to Scottish Government for onward transfer to NRS.</p> <p>A more detailed archival policy will be developed.</p>

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<p><b>Element 8: Information Security</b></p> <p><i>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.</i></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>All public authorities produce records that are sensitive. An authority's RMP <u>must</u> therefore include evidence that the authority has procedures in place to adequately protect its records. Information security procedures would normally acknowledge data protection and freedom of information obligations as well as any specific legislation or regulatory framework that may apply to the retention and security of records.</p> <p>The security procedures <u>must</u> put in place adequate controls to prevent unauthorised access, destruction, alteration or removal of records. The procedures will allocate information security responsibilities within the authority to ensure organisational accountability and will also outline the mechanism by which appropriate security classifications are linked to its business classification scheme.</p> <p>Information security refers to records in all or any format as all are equally vulnerable. It refers to damage from among other things: computer viruses, flood, fire, vermin or mould.</p> <p>Current or semi-current records do not normally require archival standard storage. Physical records will however survive far better in a controlled environment. In broad terms the environment for current records should not allow large changes in temperature or excess humidity (as increased high temperatures and humidity are more likely to cause mould). If records are not adequately protected then the risk that the records could be damaged and destroyed is potentially higher and could lead to significant reputational and financial cost to the business.</p> <p><a href="http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement8.asp">Read further explanation and guidance about element 8 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement8.asp</a></p>	<p>SPS has a range of well-established information security policies and procedures which all staff are required to comply with.</p> <p>Information Security Officers have been identified in each prison and HQ team whose role is to ensure that Information Security policies are complied with and any breaches are reported promptly to the Information Security Unit in HQ.</p> <p>The Information Governance Forum, chaired by the SIRO, meets regularly to discuss information security issues and ensure that SPS keeps sensitive information securely.</p>	<p>E13: Information Security Policies</p>	<p>No further action required</p>

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<p><b>Element 9: Data protection</b>  <b><i>An authority that handles personal information about individuals has a number of legal obligations to protect that information under the Data Protection Act 1998.</i></b></p> <p>The Keeper will expect an authority's RMP to indicate compliance 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><a href="http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement9.asp">Read further explanation and guidance about element 9 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement9.asp</a></p>	<p>SPS has a range of policies and procedures in place to ensure that personal data is managed securely in accordance with the Data Protection Act.</p> <p>A standard template for Information Sharing Agreements is used.</p> <p>Standard procedures are in place and individuals have been identified to manage the process of responding to Subject Access Requests.</p> <p>All staff are required to complete the Government's Protecting Information e-learning course every two years.</p> <p>In January 2012, the Information Commissioner's Office carried out an audit of data protection in SPS and concluded that there was reasonable assurance that data protection processes and procedures are in place and being adhered to.</p>	<p>E14: GMA 66A-13 Subject Access Requests (SARs)</p> <p>E15: Information Sharing Agreement_ Parole Process</p> <p>E16: GMA 53A-10 E-learning Course – Protecting Information</p> <p>E17: ICO Data Protection Audit</p>	<p>A detailed Retention Schedule will be developed to ensure that personal records are managed and retained in compliance with the Data Protection Act (refer to Element 5)</p>

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<p><b>Element 10: Business continuity and vital records</b>  <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 business needs, but the plan should point to it.</p> <p><a href="http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement10.asp">Read further explanation and guidance about element 10 - <u>http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement10.asp</u></a></p>	<p>The majority of SPS vital records are held electronically. SPS has IT Disaster Recovery Plans in place for each of the key IT records systems and for pay and pensions.</p> <p>All records and data held on the SPS IT network are subject to regular back up and associated recovery procedures.</p>	<p>E18: IT Disaster Recovery Plan_ Agresso Finance</p> <p>E19: IT Disaster Recovery Plan_ LSCMI-Atlas-I2</p> <p>E20: IT Disaster Recovery Plan_ Prisoner Records Service</p> <p>E21: IT Disaster Recovery Plan_ Real Asset Management</p> <p>E22: IT Disaster Recovery Plan_ SharePoint</p> <p>E23: IT Disaster Recovery Plan_ SPS People</p> <p>E24: IT Disaster Recovery_ Assurance Review</p> <p>E25: Business Continuity Plan_ Pay and Pensions</p>	<p>Business Continuity Plans will be developed to ensure that critical business activities which depend on paper based records can continue in the event of an emergency.</p>

RMP Element Description	Scottish Prison Service Statement	Evidence	Action Plan
<p><b>Element 11: Audit trail</b>  <b><i>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.</i></b></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><a href="http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement11.asp">Read further explanation and guidance about element 11 - <u>http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement11.asp</u></a></p>	<p>While some areas of SPS records have effective systems in place to audit movements or editing of a record, this is an area that needs development.</p> <p>HQ Registry documents the creation, retention, transfer and destruction of all HQ paper policy files.</p> <p>The PR2 prisoner records database has built in audit functionality which monitors changes and access to electronic prisoner records.</p>	<p>E:26 Audit Trail</p>	<p>The Records Management project will review the audit trail for paper based prisoner records.</p> <p>The conversion of paper based prisoner records processes to electronic will improve the auditability of prisoner records.</p> <p>Upgrading to SharePoint 2013 will provide audit trail functionality for all electronic records stored on the SPS intranet.</p>

RMP Element Description	Scottish Prison Service Statement	Evidence	Action Plan
<p><b>Element 12: Competency framework for records management staff</b>  <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>A competency framework outlining what the authority considers are the vital skills and experiences needed to carry out the task is an important part of any records management system. If the authority appoints an existing non-records professional member of staff to undertake this task, the framework will provide the beginnings of a training programme for that person.</p> <p>The individual carrying out day-to-day records management for an authority might not work for that authority directly. It is possible that the records management function is undertaken by a separate legal entity set up to provide functions on behalf of the authority, for example an arm's length body or a contractor. Under these circumstances the authority must satisfy itself that the supplier supports and continues to provide a robust records management service to the authority.</p> <p>The authority's RMP must confirm that it is satisfied by the standard of the records management provided by the supplier and name the organisation that has been appointed to carry out records management on the authority's behalf.</p> <p>Where an authority's records management system has been put in place by a third party, but is operated on a day-to-day basis by a member of staff in the authority, it is the competencies of that member of staff which should be confirmed, not those of the third party supplier of the system.</p> <p><a href="http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement12.asp">Read further explanation and guidance about element 12 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement12.asp</a></p>	<p>Aside from the SIRO and the Head of Records Management there are currently no specific records management staff identified within SPS.</p> <p>As part of the Records Management project, SPS will be appointing Records Managers throughout the organisation and training them appropriately.</p> <p>All staff are required to complete the Government's 'Protecting Information' e-learning training every two years.</p> <p>PR2 training is mandatory for all staff before they get access to the prisoner records database.</p>	<p>E27: Job Description for Records Manager</p> <p>E28 Records Management Competency Framework (Proposed)</p> <p>E16: GMA 53A-10 E-learning Course – Protecting Information</p>	<p>SPS will appoint Records Managers throughout the organisation and will train them appropriately.</p> <p>A competency framework has been proposed, which will need to be approved and adopted.</p>

RMP Element Description	Scottish Prison Service Statement	Evidence	Action Plan
<p><b>Element 13: Assessment and review</b>  <i>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.</i></p> <p>Section 1(5) (i)(a) of the Act says that an authority must keep its RMP under review.</p> <p>An authority's RMP <u>must</u> describe the procedures in place to regularly review it in the future.</p> <p>It is important that an authority's RMP is regularly reviewed to ensure that it remains fit for purpose. It is therefore vital that a mechanism exists for this to happen automatically as part of an authority's internal records management processes.</p> <p>A statement to support the authority's commitment to keep its RMP under review must appear in the RMP detailing how it will accomplish this task.</p> <p><a href="http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement13.asp">Read further explanation and guidance about element 13 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement13.asp</a></p>	<p>Each of the policies and procedures produced in line with the requirements of the Public Records (Scotland) Act 2011 will be further developed in consultation with colleagues across the organisation. Each new policy will be reviewed in detail in order to ensure compliance with all business as well as legal obligations</p> <p>The Records Management provisions within the Scottish Prison Service have been assessed using the Records Management Maturity Model.</p> <p>The review date for the Scottish Prison Service Records Management Plan is January 2015.</p>	<p>E29: SPS Records Management Maturity Model</p>	<p>Review Scottish Prison Service Records Management Plan January 2015</p>

RMP Element Description	Scottish Prison Service Statement	Evidence	Action Plan
<p><b>Element 14: Shared Information</b>  <i>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.</i></p> <p>The Keeper will expect an authority's RMP to reflect its procedures for sharing information. Authorities who share, or are planning to share, information must provide evidence that they have considered the implications of information sharing on good records management.</p> <p>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. It may therefore be necessary for an authority's RMP to include reference to information sharing protocols that govern how the authority will exchange information with others and make provision for appropriate governance procedures.</p> <p>Specifically the Keeper will expect assurances that an authority's information sharing procedures are clear about the purpose of record sharing which will normally be based on professional obligations. The Keeper will also expect to see a statement regarding the security of transfer of information, or records, between authorities whatever the format.</p> <p>Issues critical to the good governance of shared information should be clearly set out among parties at the earliest practical stage of the information sharing process. This governance should address accuracy, retention and ownership. The data sharing element of an authority's RMP should explain review procedures, particularly as a response to new legislation.</p> <p><a href="http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement14.asp">Read further explanation and guidance about element 14 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement14.asp</a></p>	<p>The Scottish Prison Service operates in accordance with the Information Commissioner's Data Sharing Code of Practice.</p> <p>SPS uses a standard SPS information sharing agreement template which can be modified to reflect the specific requirements and circumstances of sharing information. Information Sharing Agreements are being put in place to manage key information sharing processes.</p> <p>The ICO data protection audit of SPS carried out in January 2012 concluded that there was high assurance that processes and procedures to monitor and report on requests for personal data are in place and being adhered to and that the design and operation of controls to ensure the sharing of personal data complies with the principles of the Data Protection Act 1998.</p>	<p>E15: Information Sharing Agreement_ Parole Process</p> <p>E30: GMA 51A-10 Sharing and Sending Information</p> <p>E17: ICO Data Protection Audit</p>	<p>No further action required</p>

<b>Appendix: Summary of SPS Records Management Maturity Model as at January 2014</b>		<b>Maturity Level*</b>
<b>A</b>	Institutions should have in place organizational arrangements that support records management	<b>1 – Aware</b>
<b>B</b>	Institutions should have in place a records management policy, either as a separate policy as a part of wider information or management policy.	<b>2 – Defined</b>
<b>C</b>	Institutions should ensure they keep the records they will need for business, regulatory, legal and accountability purposes	<b>1 – Aware</b>
<b>D</b>	Institutions should keep their records in systems that enable records to be stored and retrieved as necessary.	<b>1 – Aware</b>
<b>E</b>	Institutions should know what records they hold and where they are, and should ensure that they remain usable for as long as they are required.	<b>2 – Defined</b>
<b>F</b>	Institutions should ensure that records are stored securely and that access to them is controlled.	<b>2 – Defined</b>
<b>G</b>	Institutions should define how long they need to keep particular records and should dispose of them when no longer needed.	<b>1 – Aware</b>
<b>H</b>	Institutions should ensure that records shared with other bodies or held on their behalf by other bodies are managed in accordance with Data Sharing Policies.	<b>1 – Aware</b>

\*Maturity Levels:

- 0 Absent – The organisation shows no evidence of awareness of the need to take a strategic approach to the management of records
- 1 Aware – Uncoordinated local attempts to improve records management in response to local issues
- 2 Defined – Coordinated attempts to improve records management underway across the organisation
- 3 Embedded – The effective management of records is fully integrated within the organisation’s strategic and operational activities

Note: The full SPS Records Management Maturity Model is available as evidence document E29.