



INFORMATION GOVERNANCE

RECORDS MANAGEMENT POLICY

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STRATEGIC PLANNING, PERFORMANCE AND COMMUNICATIONS

INFORMATION GOVERNANCE

RECORDS MANAGEMENT POLICY

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1. POLICY STATEMENT

The Scottish Fire and Rescue Service (SFRS) recognises that the effective management of its records is essential, in order to support its functions and activities, to comply with statutory and regulatory requirements and to demonstrate openness, transparency and accountability to its stakeholders.

Effective records management aligns with the SFRS outcome that 'we are fully accountable and maximise our public value by delivering a high quality, sustainable fire and rescue service for Scotland' ([SFRS Strategic Plan 2019-22](#), page 4).

Records are a vital corporate asset, supporting SFRS decision-making processes, policy creation and service delivery. Therefore, they must be managed effectively during their lifecycle, from creation, through maintenance and use, to disposal.

In order to achieve effective records management, SFRS will develop and maintain relevant policies, procedures, systems and practices across all of its directorates. These will be based on legislative requirements, official guidance, standards and best practice.

SFRS is committed to compliance with the [Public Records \(Scotland\) Act 2011](#) ('the 2011 Act'). Under the terms of the 2011 Act, as a Scottish public authority, SFRS has prepared a Records Management Plan, setting out proper arrangements for the management of its records. The Plan was submitted to the Keeper of the Records of Scotland and agreed in December 2017. It was approved by the Strategic Leadership Team (SLT) in January 2018 to be adopted and implemented throughout SFRS.

The development of procedures and practices within SFRS to satisfy the elements of the Records Management Plan will also ensure that SFRS effectively manages its records for its own business and operational needs.

2. PURPOSE

The purpose of this policy is to formalise the approach of SFRS to records management, to demonstrate the importance of effective records management within the Service and to act as a mandate for the implementation of records management policies, procedures, systems and practices throughout SFRS. This policy, and the procedures which will implement it, will ensure that SFRS conforms to the requirements of the 2011 Act and associated guidance.

Records management is the systematic control of SFRS records, throughout their lifecycle, in order to meet operational business needs, statutory and fiscal requirements and community expectations. The systematic management of records will allow SFRS to:

- Know which records SFRS holds and locate them easily;
- Increase efficiency and effectiveness;
- Make savings in terms of staff time and storage space;
- Support decision-making;
- Be accountable;
- Achieve business objectives and targets;
- Provide continuity in the event of a disaster;
- Provide a 'corporate memory';
- Meet legislative and regulatory requirements, particularly as laid down by the [Freedom of Information \(Scotland\) Act 2002](#) and the [Data Protection Act 2018](#);
- Protect the interests of employees, clients and stakeholders.

SFRS will manage its records in a manner which ensures that they remain:

- Accessible** Records must be readily accessible when needed.

- Accurate** Records must accurately reflect the transactions which they document.

- Authentic** It must be possible to prove that records are what they claim to be and who created them, by keeping a record of their management through time. Where information is later added to an existing document within a record, the added information must be signed and dated. With electronic records, changes and additions must be identifiable through audit trails.

- Complete** Records must be sufficient in content, context and structure to reconstruct the relevant activities and transactions which they document.

- Comprehensive** Records must document the complete range of SFRS business.

- Compliant** Records must comply with any record-keeping requirements resulting from legislation, audit rules and other relevant regulations.

- Effective** Records must be maintained for specific purposes and the information contained in them must meet those purposes. Records will be identified and linked to the business processes to which they are related.

- Secure** Records must be securely maintained to prevent unauthorised access, alteration, damage or removal. They must be stored in a secure environment, the degree of security reflecting the sensitivity and importance of the contents.

This is especially important in enabling SFRS to meet legislative requirements, in particular, the requirements of the [Data Protection Act 2018](#).

This will be achieved through the development and implementation of effective records management policies, procedures, systems and practices, including:

- The introduction of an electronic records management system, which will act as the main repository for SFRS records, except where the records are created, stored and used in other electronic systems, e.g. Vision Boss, Tech1, etc., or required in another format, e.g. paper;
- The introduction of a business classification scheme to reflect the functions, activities and transactions of SFRS, which will enable the efficient storage, retrieval and disposal of records;
- The introduction of a records retention schedule which provides guidance as to how long to keep different types of records and how to dispose of them;
- The establishment of record destruction arrangements, such as guidance to staff and contracts with external contractors;
- The establishment of record transfer arrangements to appropriate public archives of records of enduring, historical value;
- The establishment of appropriate information security policies and procedures to protect records from unauthorised access, use, disclosure, destruction or loss;
- The establishment of appropriate data protection policies and procedures to ensure that the management of records containing personal data complies with the Data Protection Act 2018;
- The establishment of appropriate information sharing arrangements to ensure that the sharing of personal data or confidential/sensitive information is carried out appropriately;
- The establishment of a business continuity plan, which includes the identification of the records which are vital to the operation of SFRS;
- The introduction of audit trail mechanisms in order to capture the key events in a record's lifecycle;

- The introduction of a competency framework for records management staff, to ensure that records management within SFRS is carried out in a professional manner and meets the requirements of relevant legislation, codes of practice, standards and best practice;
- The establishment of an assessment and review programme to ensure that records management policies, procedures, systems and practices remain fit for purpose.

As mentioned above, this policy and related procedures will ensure that SFRS conforms to the requirements of the 2011 Act, as well as helping to meet requirements under other 'access to information' legislation:

- [Data Protection Act 2018](#);
- [Environmental Information \(Scotland\) Regulations 2004](#);
- [Freedom of Information \(Scotland\) Act 2002](#);
- [Re-use of Public Sector Information Regulations 2015](#).

For example, Freedom of Information legislation is only as good as the quality of the records to which it provides access. Such rights are of limited use if reliable records are not created in the first place, if they cannot be found if needed or if the arrangements for their eventual archiving or destruction are inadequate.

In implementing records management policies, procedures, systems and practices throughout the Service, SFRS will take heed of the guidance provided in relevant codes of practice. If SFRS fails to comply with these codes, it may also be failing to comply with the requirements of the relevant legislation, for example:

- [Code of Practice on Records Management under section 61\(6\) of the Freedom of Information \(Scotland\) Act 2002](#).

Where appropriate, SFRS will also use relevant standards as a benchmark for best practice in records management, for example:

- BS 10008 – Evidential weight and legal admissibility of electronic information;
- ISO 15489 – Information and documentation. Records management;
- ISO 16175 – Principles and functional requirements for records in electronic office environments;
- ISO 23081 – Managing metadata for records;
- ISO 27001 – Information security management system;
- ISO 30300 – Management systems for records.

3. SCOPE

This policy applies to all records created, received and maintained by SFRS in the course of its functions and activities. It therefore applies to all employees of SFRS, whether permanent or temporary, as well as contractors, consultants, secondees, work experience placements, etc. who have access to such records. The policy applies whether employees are working in the office, at home, mobile working or working in joint partnerships.

This policy applies to all records regardless of their location or format (e.g. paper, electronic, audio-visual) and to all systems used to create or store records (e.g. filing systems, e-mail, databases).

4. RESPONSIBILITIES

SFRS has a corporate responsibility to ensure that its records are managed effectively. Different staff have different roles and responsibilities in relation to records management, as below:

The **Director of Strategic Planning, Performance and Communications** has overall senior responsibility for records management. The SFRS Records Management Plan has the approval and support of the SLT and the Director accepts overall responsibility for the submitted Plan.

The **Information Governance Manager** has responsibility for overseeing the work of the Records Management Officer in terms of the implementation of the Plan and compliance with this policy.

The **Records Management Officer** has day-to-day operational responsibility for records management, for implementing the Records Management Plan and for ensuring compliance with this policy and the Plan. The Records Management Officer will be responsible for ensuring that relevant procedures, systems and practices are in place, for providing appropriate guidance and training to staff and for reviewing this policy on a two-yearly basis or as required.

Heads of Departments / Functions have responsibility for ensuring the implementation of this policy within their sphere of control and responsibility.

Line managers have responsibility for raising awareness of records management amongst the employees for whom they are responsible and for ensuring that employees familiarise themselves with this policy and related procedures.

All SFRS staff have a responsibility to manage the records they create, receive and use in accordance with this policy.

5. DEFINITIONS

Archiving	The disposal of records by permanently transferring them to a public archive and recording that such action has been taken.
Audit trail	The mechanism by which an organisation monitors the movement and/or editing of a record.
Business classification scheme	A structure or 'file plan' which categorises an organisation's functions, activities and transactions to aid in the retrieval, storage and disposal of records.
Business continuity	A continuous process that helps an organisation anticipate, prepare for, prevent, respond to and recover from disruptions, whatever their source and whatever aspect of the business they affect; it establishes a generic framework that can be applied to a range of potential disruptions, whether impacting staff, properties, systems or external providers.
Competency framework	A competency framework lists the core competencies and the key knowledge and skills required by staff; it can be used as a basis for developing job specifications, identifying training needs and assessing performance.
Destruction	The disposal of records by permanently destroying them and recording that such action has been taken.
Disposal	The decision as to whether a record should be destroyed or transferred to an archive for permanent preservation and the putting into effect of that decision.

Electronic records management system	An automated system used to manage the creation, use, maintenance and disposal of electronic records; it should be used to manage records within classification schemes, apply retention schedules and control access and use; it should also be able to maintain a record along with its associated metadata.
Format	A record can be in any format, including but not limited to: paper, e-mail, audio-visual, electronic, systems data, databases, digital images and photographs.
Lifecycle	The steps in the life of a record, from its creation, through its maintenance and use as long as it has continuing value, to its disposal, either by destruction or by transfer to an archive for permanent preservation.
Metadata	'Data about data', which is necessary in order to understand the context, purpose, extent and location of a record. Examples of metadata include the creator, creation date, receipt date, editor, access history and disposal.
Public archive	A local authority archive or national archive to where an organisation's records of enduring historical value are transferred for permanent preservation.
Record	Any information created, received and maintained as evidence and information by an organisation or person, in pursuance of legal obligations or in the transaction of business. Some information is of ephemeral or very short-term value, does not constitute a record and therefore does not need to be managed as such.

- Records management** The systematic control of an organisation's records, throughout their life cycle, in order to meet operational business needs, statutory and fiscal requirements and community expectations. Effective management of records allows fast, accurate and reliable access to records, ensuring the timely destruction of redundant information and the identification and protection of vital and historically important records.
- Retention schedule** A document showing how the records of an organisation will be treated over time, e.g. how long they should be retained and how they should be disposed of.
- Transfer** The moving of records of enduring historical value from an organisation's custody to that of a public archive for permanent preservation.
- Vital records** The very small number of an organisation's records which are essential to the running of the organisation, e.g. records which, if you could not access them, it would have a considerable and very serious impact on the organisation or records which are irreplaceable and, if you were unable to produce them, the long-term consequences would be very serious.

6. ASSOCIATED DOCUMENTS / REFERENCES

Equality Impact Assessment – Records Management Policy

Equality Impact Assessment – Records Management Arrangements

Business Continuity Strategy

Good records management is essential to provide business continuity in the event of a disaster, through the identification and protection of vital records.

Data Protection Policy

Employee Information Privacy Notice

Processing Personal Data Procedure

Subject Access Public Guidance

Subject Access Requests Procedure

Records containing personal data must be managed properly for compliance with the Data Protection Act 2018, to ensure proper processing of such data and prompt handling requests for access to such data.

FOI and Environmental Information Requests Handling Procedure

Good records management is essential for compliance with FOI and Environmental Information legislation, to ensure the creation of reliable records, prompt searching and locating of relevant information and appropriate archiving or destruction of records.

Information Security Handbook

Government Security Classification Policy

Government Security Classification Policy Quick Guide

Egress Switch Secure Email User Guide

Good records management is essential to ensure that records containing personal data or confidential/sensitive information are kept secure, through methods such as protective marking and secure email.

File Classification Scheme (to be issued)

File Naming Conventions Guidance

Use of the scheme and guidance will ensure that records are stored, retrieved and disposed of efficiently and appropriately.

Records Retention Schedule

Records Destruction Procedure (to be issued)

Records Transfer Procedure (to be issued)

Use of the schedule and transfer and destruction arrangements will ensure that records are kept for as long as they are required and disposed of at the end of their lifecycle, either by transfer to a public archive or by appropriate destruction methods.

External References:

[Code of Practice on Records Management under section 61\(6\) of the Freedom of Information \(Scotland\) Act 2002](#)

[Data Protection Act 2018](#)

[Environmental Information \(Scotland\) Regulations 2004](#)

[Freedom of Information \(Scotland\) Act 2002](#)

[Public Records \(Scotland\) Act 2011](#)

[Re-use of Public Sector Information Regulations 2015](#)