**Records Management Plan**



**sport**scotland is statutorily obliged under the terms of the Public Records (Scotland) Act 2011 [the Act] to publish a Records Management Plan (RMP), which sets out proper arrangements for the management of its public records. The finalised Plan will be submitted to the Keeper of the Records of Scotland for review on request.

This RMP seeks to address this obligation and follows associated published Guidance through the inclusion of the 14 suggested elements.

Each of the individual elements contains the detail of the Assessment and Review activity and the timescale for this. In addition, an overarching annual review will be undertaken by the Head of Office Support Services to ensure its ongoing fitness for purpose. This will be undertaken in March each year and a statement made to the Chief Executive around the systems of control in place to ensure appropriate management of the organisation’s records.

The Records Management Plan is supported by a Development Plan which sets in place a series of actions as part of a continuous process of improvement (RMP022).

Please find below the Records Management Plan of **sport**scotland.

Primary and supporting documents

* Item RMP001: Statement of Responsibility for Records Management
* Item RMP002: Information Assessment Manager Person Specification
* Item RMP003: Records Management Policy Statement
* Item RMP004: CCTV Policy (H&S Toolkit)
* Item RMP005: ID & Access Policy – **OFFICIAL SENSITIVE** (H&S Toolkit)
* Item RMP006: Counter Terrorist Protective Security Policy – **OFFICIAL SENSITIVE** (H&S Toolkit)
* Item RMP007: Business Classification Scheme
* Item RMP008: Retention and Destruction Schedule
* Item RMP009: Records Disposal Policy
* Item RMP010: Snapshot of Open Web Archive
* Item RMP011: Information Security Guidelines – **OFFICIAL SENSITIVE**
* Item RMP012: ICT Self Help Portal Guide
* Item RMP013: Mobile Phone Policy
* Item RMP014: Interim BYOD Policy
* Item RMP015: ICT New User Request Form
* Item RMP016: ICT Strategy 2010-15 – Reviewed February 2014
* Item RMP017: Risk Management Policy and Procedures
* Item RMP018: GDPR Internal Data Protection Policy
* Item RMP019: Freedom of Information Policy and Procedures
* Item RMP020: Business Continuity Plan – **OFFICIAL SENSITIVE** – refreshed February 2014
* Item RMP021: Data Disaster Recovery Plan – **OFFICIAL SENSITIVE**
* Item RMP021: Data Disaster Recovery Plan Appendices – **OFFICIAL SENSITIVE**
* Item RMP022: Records Management Development Plan
* Item RMP023: Internet, Intranet and e-mail Acceptable Use Policy

sport**scotland Records Management Plan**

**Element 1 : Senior Management Responsibility**

**Mandatory Requirement**

**sport**scotland is required to identify the person at a senior level who has overall strategic responsibility for records management within the organisation. .

**Statement of Compliance**

The Senior Responsible Officer for Records Management within **sport**scotland is the Chief Executive : Stewart Harris and he has appointed the Chief Operating Officer: Forbes Dunlop, as Senior Information Risk Owner. A comprehensive listing of various roles associated with records management has been developed to ensure clarity.

**Evidence of Compliance**

Primary evidence to be submitted in support of Element 1 includes:

* Item RMP001 : Statement of Responsibility for Records Management

Supporting evidence to be submitted includes:

* Item RMP003 : Records Management Policy Statement

**Future Developments**

It is intended to develop an e-learning module to ensure that all are clear on their individual responsibilities. In addition, if any of the current key postholders were to change the roles and responsibilities would be revisited at that time.

**Assessment and Review**

This element will be reviewed to take account of any changes in personnel.

**Responsible Officer**

Chief Executive of **sport**scotland, Stewart Harris.

**Element 2 : Records Manager Responsibility**

**Mandatory Requirement**

**sport**scotland is required to identify the individual within the organisation, answerable to senior management, to have operational responsibility for records management.

**Statement of Compliance**

The officer with operational responsibility for Records Management within **sport**scotland is the Information Asset Manager, Scott Baxter.

**Evidence of Compliance**

Primary evidence to be submitted in support of Element 2 includes:

* Item RMP001 : Statement of Responsibility for Records Management
* Item RMP002 : Information Assessment Manager Job Description

Supporting evidence to be submitted includes:

* Item RMP003 : Records Management Policy Statement

**Future Developments**

There are no planned future developments in respect of Element 2 arrangements, however, if the current post holder were to change the role and responsibilities would be revisited at that time. Mr Baxter will continue to undertake relevant training and development to ensure ongoing competence to discharge the role (as described in Element 12).

**Assessment and Review**

This element will be reviewed to take account of any changes in personnel.

**Responsible Officer**

Head of ICT and Business Continuity, Mark Murphy

**Element 3 : Records Management Policy Statement**

**Mandatory Requirement**

**sport**scotland requires to have in place a clear policy statement which demonstrates the importance of managing records within **sport**scotland and which serves as a mandate for the activities of the Records Manager (Information Asset Manager). The policy should provide an overarching statement of the organisation’s priorities and intentions in relation to recordkeeping and a framework for the development and implementation of a robust records management culture.

**Statement of Compliance**

A Records Management Policy has been developed which is reflective of the recordkeeping arrangements in place across **sport**scotland. This was approved by the Strategic Management Team in February 2014.

Several of the health and safety policies, established to support the protection of **sport**scotland’s staff and visitors, have the additional benefit of supporting the protection of its information assets.

**Evidence of Compliance**

Primary evidence to be submitted in support of Element 3 includes:

* Item RMP003 : Records Management Policy Statement

Supporting evidence to be submitted includes:

* Item RMP004: CCTV Policy (H&S Toolkit)
* Item RMP005: ID & Access Policy – **OFFICIAL SENSITIVE** (H&S Toolkit)
* Item RMP006: Counter Terrorist Protective Security Policy – **OFFICIAL SENSITIVE** (H&S Toolkit)

**Future Developments**

There are no planned future developments in respect of the detail of Element 3, however, the policy will be reviewed regularly to ensure it continues to reflect the organisation’s position in relation to recordkeeping and to take account of any changes in statutory requirements. As mentioned under Element 1, it is intended to develop an e-learning module to ensure that staff are aware of their responsibilities in the delivery of the Records Management Policy.

**Assessment and Review**

This element will be maintained by the Information Asset Manager and reviewed formally on an annual basis by the Information Asset Manager and the Head of ICT and Business Continuity.

**Responsible Officer**

Head of ICT and Business Continuity, Mark Murphy

**Element 4 : Business Classification**

**Requirement**

It is expected that **sport**scotland will have carried out a comprehensive assessment of its core business functions and activities and represent these within a business classification scheme.

**Statement of Compliance**

Following the extensive restructuring involved during the merger in 2009/10 of **sport**scotland, the Institute of Sport and various Sporting Partnerships, it was recognised that a comprehensive review and refresh of the organisation’s business classification scheme was required. This was undertaken throughout 2011 in readiness for the introduction of SharePoint as the organisation’s new corporate electronic document management system in March 2012.

Key to the Business Classification Scheme is the use of the **sport**scotland Business Plan. The scheme follows the business plan in structure and vocabulary allowing staff to deposit documents into a structure that is very familiar to them. This also supports a framework for implementing necessary information security requirements in addition to the ability to apply retention periods in line with the organisation’s retention and destruction scheme.

Since March 2012, the functionality of the SharePoint system has continued to be explored and utilised and the Metadata element has been developed to exploit the user view and search capability of the system. The system therefore relies less on hierarchal structures and more on the use of multi information classifications in the use of Libraries and Metadata (which have the effect of creating multiple electronic folders for each and any document and thereby improving the ability to access relevant information).

In addition to the above, the organisation also takes account of the Government Security Classifications which came into force on 2April 2014. Within this context, all **sport**scotland information has been classified as **Official**, with additional under-pinning classifications within the category of **Official-Sensitive.**

**Evidence of Compliance**

Primary evidence to be submitted in support of Element 4 includes:

* Item RMP007 : Business Classification Scheme

Supporting evidence to be submitted includes:

* Item RMP008: Retention and Destruction Schedule

**Future Developments**

Given the introduction of SharePoint and staff’s growing awareness of the value of the use of Metadata, this has been subject to on-going development during 2014/15 and this has continued during 2015/16 and 2016/17. During this timescale, colleagues across the organisation will be consulted on the plan to upgrade to SharePoint 2016, with the intention that any significant changes to the business classification scheme would be implemented concurrently with its implementation.

**Assessment and Review**

As above, this element will be reviewed by June 2017 in advance of the introduction of SharePoint 2016.

**Responsible Officer**

Head of ICT and Business Continuity, Mark Murphy

**Element 5 : Retention Schedules**

**Requirement**

**sport**scotland is required to have in place a retention and disposal schedule which sets out recommended retention periods for all records created and held. This is seen as essential to ensure that records are not retained for longer than necessary, in line with legal, statutory and regulatory obligations (such as the General Data Protection Regulations and Freedom of Information Scotland Act). **sport**scotland’s retention schedules must demonstrate the existence of and adherence to established records retention procedures which in turn demonstrate how the organisation routinely disposes of information whether destruction or to permanent archive. It is expected that the timely destruction of business information and the early identification and transfer of records worthy of permanent preservation will lead to minimal storage costs.

**Statement of Compliance**

A retention and destruction schedule has been in place since 2010 and was further reviewed and updated in 2011/12 in readiness for the introduction of SharePoint as the organisation’s corporate electronic document management system from March 2012. The retention periods contained within the scheme have been implemented for the documents contained within SharePoint, including those migrated from Livelink (the previous organisation electronic document management system). This includes electronic notifications to document owners prior to destruction providing both a safeguard for document owners and an audit trail of record destruction.

The retention and destruction schedule references whether the records are held electronically or in paper form. Where the records are held electronically, the key system where the records are held is detailed. The retention and destruction schedule was last reviewed in November 2019.

Whilst good progress has been and continues to be made to digitise all **sport**scotland’s records wherever possible and practicable, there are well established procedures for the archiving and secure destruction for those paper records still undergoing digitisation, e.g. finance and HR, to ensure compliance with the retention and destruction schedule.

**Evidence of Compliance**

Primary evidence to be submitted in support of Element 5 includes:

* Item RMP008: Retention and Destruction Schedule

Supporting evidence to be submitted includes:

* Item RMP009: Records Disposal Policy

**Future Developments**

The current retention and destruction schedule has been implemented within SharePoint, the organisation’s electronic document management system. Further work is required to ensure that SharePoint is the primary location for storing **sport**scotland’s electronic records and that the use of Shared and Personal Drives is minimised and they are used as temporary locations only.

High level mapping of this was undertaken in 2014/15 and due to the significance of the use of Shared and Personal Drives a process of rationalisation has commenced.

The mapping activity included the records contained within other **sport**scotland’s systems such as Pentara, Smartabase, PSfinancials, iTrent, etc. In addition, further work will be undertaken to identify and detail within the schedule any individual records required for permanent preservation (see Element 7).

**Assessment and Review**

The retention and destruction schedule will be reviewed informally during the above activity by the Information Asset Manager to inform a formal review with the ICT Manager in February/March 2018 with a view to publishing any revised schedule for implementation from May 2018.

**Responsible Officer**

Head of ICT and Business Continuity, Mark Murphy

**Element 6 : Destruction Arrangements**

**Mandatory Requirement**

**sport**scotland is required to demonstrate that arrangements are in place for the secure destruction of confidential information in order to minimise the risk of an information security incident and meet our obligations in relation to the effective management of records throughout their lifecycle.

**Statement of Compliance**

A Records Disposal Policy, detailing the procedures for the disposal of records within **sport**scotland in in place. .

**Evidence of Compliance**

Primary evidence to be submitted in support of Element 6 includes:

* Item RMP009: Records Disposal Policy

Supporting evidence to be submitted includes:

* Item RMP008: Retention and Destruction Schedule

**Future Developments**

It is intended to review the implementation of these procedures by end September 2015, both for appropriateness and use.

**Assessment and Review**

This element will be reviewed in May 2018 to take account of any learning from operational experience.

**Responsible Officer**

Information Asset Manager, Scott Baxter

**Element 7 : Archiving and Transfer Arrangements**

**Mandatory Requirement**

**sport**scotland is required to ensure that any records of long term historical value are identified and deposited with an appropriate archive repository. Arrangements for the transfer of material of enduring value to an archive should be clearly defined and made available to all staff in order to ensure that the records are transferred at their earliest opportunity and the corporate memory of the organisation is full and accurately preserved.

**Statement of Compliance**

The National Records of Scotland archives **sport**scotland’s website every six months (in February and August) and makes these available through its Website. This contains regular snapshots of thousands of websites with research value that are representative of Scottish social history and cultural heritage.

Externally published research documents are allocated an International Standard Book Number (ISBN) and the British Library holds any document categorised as such. Accordingly the range of research publications held by **sport**scotland are routinely requested by and provided to the British Library.

In addition, **sport**scotland is currently in discussion with the National Records of Scotland to confirm the extent of what they would view as records of long term historical value. We note that comprehensive guidance on transfer arrangements is to be produced by the Government Records Branch, in the form of an Archive Transfer Pack.

**Evidence of Compliance**

Primary evidence to be submitted in support of Element 7 includes:

* Item RMP010 : Snapshot of Open Web Archive

Supporting evidence to be submitted includes:

* Item RMP008: Retention and Destruction Schedule
* Item RMP009: Records Disposal Policy

**Future Developments**

In tandem with concluding the discussions with the Government Records Branch of National Records Scotland, it is anticipated that an Archive Transfer Pack will be issued against which current practices will be reviewed. It is expected that this will include agreeing a Memorandum of Understanding with National Records Scotland.

**Assessment and Review**

The timescale for review of our arrangements will be determined by the receipt of the Archive Transfer Pack.

**Responsible Officer**

Head of ICT and Business Continuity, Mark Murphy

**Element 8 : Information Security**

**Mandatory Requirement**

**sport**scotland is required to make provisions for the proper level of security of its records in order to protect its information and information systems from unauthorised access, use, disclosure, disruption, modification or destruction. There must be evidence of robust information security procedures that are well understood by all staff and any other authorised users of **sport**scotland’s information, such as Contractors.

**Statement of Compliance**

**sport**scotland has well established information security policies and procedures in place with which all staff and contractors are required to comply. The ICT systems have been risk assessed in line with the **sport**scotland Risk Management Policy and Procedures.

The ICT policies and procedures were designed to meet the requirements of the Scottish Government’s Security Policy Framework and have been subject to various internal and external audits, with any associated recommendations addressed.

On appointment, line/contract managers are required to authorise the ICT team to allow access to the various **sport**scotland’s systems and any protected areas within these as appropriate to their team member’s role.

In addition to the system security arrangements, SharePoint allows for the restriction of access at a record level within confidential business areas.

**Evidence of Compliance**

Primary evidence to be submitted in support of Element 8 includes:

* Item RMP011: Information Security and Password Guidelines – **OFFICIAL SENSITIVE**
* Item RMP012: ICT Self Help Portal Guide
* Item RMP013: Mobile Phone Policy
* Item RMP014: Interim BYOD Policy
* Item RMP015: ICT New User Request

Supporting evidence to be submitted includes:

* Item RMP003: Records Management Policy Statement
* Item RMP007: Business Classification Scheme
* Item RMP016: ICT Strategy 2010-15 – Reviewed February 2014
* Item RMP017: Risk Management Policy
* Item RMP020: Business Continuity Plan - **OFFICIAL SENSITIVE**– refreshed February 2014
* Item RMP021: Data Disaster Recovery Plan – **OFFICIAL SENSITIVE**

**Future Developments**

We have been advised that the Scottish Government will issue guidance for the development of a Bring Your Own Device Policy which meets the requirements of the Public Records Scotland Act. On receipt this will be used as the basis of the development of a more comprehensive **sport**scotland BYOD Policy.

**Assessment and Review**

This element will be reviewed on annual basis in February each year by the ICT Manager. In addition, it will be reviewed to take account of any new policy development or refresh, e.g. on completion of the BYOD Policy

**Responsible Officer**

Head of ICT and Business Continuity, Mark Murphy

**Element 9 : Data Protection**

**Introduction**

As a holder of personal information, **sport**scotland has a legal obligation to comply with the requirements of the European General Data Protection Regulation 2018 in the management, processing and protection of personal information.

**Statement of Compliance**

**sport**scotland has in place a comprehensive GDPR Policy and procedures which are maintained by the Data Protection Officer – Kerry Lochrie. In addition, **sport**scotland has established comprehensive Freedom of Information Policy and Procedures which are supported by an e-learning module.

**Evidence of Compliance**

Primary evidence to be submitted in support of Element 9 includes:

* Item RMP018: GDPR Internal Data Protection Policy
* Item RMP019: Freedom of Information Policy and Procedures

**Future Developments**

.

**Assessment and Review**

The GDPR Policy and Procedures are maintained by the **sport**scotland Data Protection Officer – Kerry Lochrie and reviewed formally on an annual basis.

**Responsible Officer**

Data Protection Officer – Kerry Lochrie

**Element 10 : Business Continuity and Vital Records**

**Requirement**

It is recommended that **sport**scotland has a Business Continuity Plan in place in order to ensure that key records and business critical information systems are adequately protected and made available as soon as possible in the event of, and following, an emergency. It is expected that the Plan should identify the measures in place to prepare for, respond to and recover from such an emergency.

**Statement of Compliance**

**sport**scotland has in place a comprehensive Business Continuity Plan and associated Data Disaster Recovery Plan which have been developed in line with the overarching **sport**scotland Risk Management Strategy which provides the framework for a risk assessment of the various information systems.

The Plans rely on having robust, embedded back up and contingency processes. These Plans are updated annually and, in addition to undertaking desktop reviews and detailed activity such as penetration testing, have been subject to regular internal and external audit reviews.

Following a strategic risk assessment of the potential additional security and operational risks associated with such a high profile sporting event as the Glasgow 2014 Commonwealth Games, an interim Business Continuity Plan was in place for the period covering July and August 2014.

Building on previous internal and external audit activity, the Business Continuity and Data Disaster Recovery Plans were subject to a positive internal audit review during March 2014.

**Evidence of Compliance**

Primary evidence to be submitted in support of Element 10 includes:

* Item RMP020: Business Continuity Plan – **OFFICIAL SENSITIVE** - reviewed February 2014
* Item RMP021: Data Disaster Recovery Plan – **OFFICIAL SENSITIVE**

Supporting evidence to be submitted includes:

* Item RMP017: Risk Management Policy & Procedures

**Future Developments**

The internal audit recommendations in respect of the Business Continuity and Data Disaster Recovery Plans have been implemented where appropriate. These were subject to internal audit follow up review during February 2015. Proposals are in place to involve the Reinstatement Team members in review exercises.

**Assessment and Review**

The Business Continuity Plan contains provision for an annual desk top review to be undertaken at the beginning of each calendar year, to inform the annual formal review exercise to be undertaken by end March each year. The review in 2013/14 focussed on CG2014 and resulted in the commissioning of an Interim Plan for the period covering July and August 2014. The Business Continuity Plan and Data Disaster Recovery Plan have been reviewed to take account of recommendations made in the internal audit review, the Incident Management Team desk top review and Reinstatement Team training exercise.

**Responsible Officer**

Head of ICT and Business Continuity, Mark Murphy

**Element 11 : Audit Trail**

**Requirement**

**sport**scotland is expected to be able to provide evidence that it maintains a complete and accurate representation of all changes that occur in relation to a particular record, including movement and or editing.

**Statement of Compliance**

**sport**scotland uses SharePoint as its corporate electronic document management system. SharePoint captures audit information including the document creator, date of creation, versions, access to a document and its final destruction. This information is also transferred to and is available on individual documents retained within the system.

SharePoint will, when a document meets its destruction date send an email notification to the document owner and the last member of staff to modify the document.

A high level mapping activity has taken place, as referenced in the Retention and Destruction Schedule (Element : 8) and includes the detail of the records contained within other **sport**scotland’s systems such as Pentara, Smartabase, PSfianancials, iTrent, etc.

It is also an aim to have virtually all of **sport**scotland’s records held electronically by December 2018.

**Evidence of Compliance**

Primary evidence to be submitted in support of Element 11 includes:

* Item RMP005 : Business Classification Scheme
* Item RMP006: Retention and Destruction Schedule

**Future Developments**

As described earlier, SharePoint is the organisation’s electronic document management system and further work is required to ensure that it is the primary location for storing **sport**scotland’s electronic records and ensure its audit function can be fully exploited. Mapping of this requirement was undertaken during 2014/15 with proposals for initial migration/destruction to be implemented in March 2015. In addition, further work will be undertaken to identify and detail within the schedule any individual records required for permanent preservation (see Element 7). An additional action is in place to digitise **sport**scotland’s paper records by March 2018, to be stored in SharePoint.

**Assessment and Review**

This element will be reviewed at the completion of the mapping activity by March 2018.

**Responsible Officer**

Head of ICT and business Continuity, Mark Murphy

**Element 12 : Competency Framework for Records Management Staff**

**Introduction**

**sport**scotland is required to define and make available the core competencies and key knowledge and skills required by staff with responsibilities for records management. It is expected that all staff are able to access current expert advice and guidance

**Statement of Compliance**

The job description for the Information Asset Manager makes clear the core competencies, knowledge and skills required. This is used as the basis for the personal development review process, which in turn uses a competency based framework.

**Evidence of Compliance**

* Item RMP001 : Statement of Responsibility for Records Management
* Item RMP002 : Information Assessment Manager Job Description

**Future Developments**

The Information Asset Manager is a Member of the Information and Records Management Society. It is intended that this will provide an additional level of knowledge and access to a network of records managers.

As described earlier, an e-learning module on records management will be implemented across the organisation from April 2017. This will ensure that all staff are clear on their individual responsibilities and be aware of where to get additional information and guidance.

**Assessment and Review**

This element will be reviewed on completion of the Information Asset Manager’s application for membership of the Information and Records Management Society and during the on-going personal development process.

**Responsible Officer**

Head of ICT and Business Continuity, Mark Murphy

**Element 13 : Review and Assessment**

**Introduction**

It is expected that **sport**scotland’s Records Management Plan contains provision for review activity to ensure that it remains current and records management practices remain fit for purpose. The Plan should allow for close monitoring and review in order to provide assurance that the Plan is operating efficiently and that any opportunities for improvement are identified and actioned.

**Statement of Compliance**

Each individual element of this Records Management Plan contains the detail of an individual review process and associated timescale. This is summarised in the Records Management Development Plan which is intended as a dynamic document. In addition to the above, the Head of ICT and Business Continuity will review the entire RMP on an annual basis in March and report on this activity to the SMT (noting that this timescale will inform the CEO Statement on Internal Controls).

The Records Management Development Plan was subject to internal audit in February 2014 and subject thereafter to follow-up review activity in February 2015 and reporting to the SMT and Audit Committee.

**Evidence of Compliance**

Primary evidence to be submitted in support of Element 13 includes:

* Item RMP022: Records Management Development Plan

**Future Developments**

**Assessment and Review**

As above, the RMP and associated Development Plan will be reviewed subject to initial internal audit activity and thereafter the RMP will be reviewed on an annual basis, in March each year.

**Responsible Officer**

Head of ICT and Business Continuity, Mark Murphy

**Element 14 : Shared Information**

**Introduction**

**sport**scotland is required to have in place procedures for the sharing of information both internally and with external partners which ensure information security and recordkeeping compliance. Protocols should include guidance as to what information can be shared, who should retain the data, what levels of security are to be applied, who should have access and what the disposal arrangements are.

**Statement of Compliance**

In order to share the information it owns with interested parties and meet its obligations under the Freedom of Information Scotland Act and the requirements under the General Data Protection Regulations, **sport**scotland has adopted the Information Commissioner’s Model Publication Scheme. In addition, **sport**scotland works in line with the HM Government Information Sharing Vision Statement, particularly Aim 7 for Better, more effective and targeted policy implementation which aligns to its objective of developing a world class sporting system.

**Evidence of Compliance**

Primary evidence to be submitted in support of Element 14 includes:

* Item RMP018: GDPR Internal Data Protection Policy
* Item RMP019: Freedom of Information Policy and Procedures

Supporting evidence to be submitted includes:

* Item RMP008: Retention and Destruction Schedule

**Future Developments**

In recognition of its role as the national agency for sport and acting as a portal to sports related information, **sport**scotland will seek to define specific arrangements for information sharing, establishment of clear information sharing protocols, the development of an Information Sharing Policy Statement and a Memorandum of Understanding template. In addition, in parallel, it will continue to consult widely with sporting partners to identify and agree the role of **sport**scotland in the reporting of information and the information to be shared.

**Assessment and Review**

This element will be reviewed in May 2017 when it is expected that an Information Sharing Policy Statement and protocols will have been drafted for consultation with a view to implementation later in financial year 2017/18.

**Responsible Officer**

Head of ICT and Business Continuity, Mark Murphy