records management plan

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###  Introduction

The Public Records (Scotland) Act 2011 requires that public authorities subject to the Act must submit a Records Management Plan for agreement by the Keeper of the Records of Scotland, and thereafter manage its records in accordance with the plan. This document seeks to fulfill that function for NHS Education for Scotland (NES). It is based on the Model Records Management Plan published by the Keeper: <http://www.nas.gov.uk/recordKeeping/PRSA/modelPlan.asp>

### Background

NHS Education for Scotland is a Special Health Board established in 2002 under Statutory Instrument 2002 No 103, The NHS Education for Scotland Order 2002. <http://www.legislation.gov.uk/ssi/2002/103/contents/made>

NES is the education and training body for NHSScotland, with over 700 staff at eleven sites around Scotland. (NES is also the employer of Medical General Practitioners in training in Scotland (GPSTs) but their working records are excluded from the scope of this plan, being the responsibility of the relevant Medical Practice.)

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| RMP Element Description | NES Statement | Evidence | Action plan |
| --- | --- | --- | --- |
| Element 1: Senior management responsibility:***Identify an individual at senior level who has overall strategic accountability for records management.***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 must name and provide the job title of the senior manager who accepts overall responsibility for the RMP that has been submitted.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. 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).Read further explanation and guidance about element 1 - <http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement1.asp> | Our Deputy Chief Executive and Director of Finance and Corporate Resources, Caroline Lamb, has senior responsibility for all aspects of Information Governance, and is the corporate owner of this document. Caroline Lamb also chairs the Information Governance Group which oversees corporate records management activity. | 01-01 “*IGP002 NES Records Management Policy v2”* Pages 3 and 401-02 *“IGP001 NES Information Governance Policy v2”**01-03* Signature at end of this document01-04 Sample minute of Information Governance Group | None |
| Element 2: Records manager responsibility:***Identify individual within the authority, answerable to senior management, to have day-to-day operational responsibility for records management within the authority.***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 must 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 implementation 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. Read further explanation and guidance about element 2 - <http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement2.asp> | Our existing RM and IG Policies name the Information Governance Manager, Frank Rankin, as having day-to-day operational responsibility for records management. He will be the Keeper’s initial point of contact for the purposes of PRSA. The work is shared with Information Governance Officer, Aidan Robertson. Frank Rankin owns all the Actions identified in the Action Plan section of this document.Contact details:Frank.rankin@nes.scot.nhs.uk 0141 352 2923 | 01-01 “*IGP002 NES Records Management Policy v2”* Pages 3 and 401-02 *“IGP001 NES Information Governance Policy v2”*02-01 Job description for Information Governance Manager02-02 Job description for Information Governance Officer | None |
| Element 3: Records management policy statement: ***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.***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. The statement should demonstrate how the authority aims to ensure that its records remain accessible, authentic, reliable and useable through any organisational or system change. This would include guidelines for converting or migrating electronic records from one system to another.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.Read further explanation and guidance about element 3 - <http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement3.asp> | NES has an existing records management policy. The current (second) version is due for bi-annual review in August 2013. It is published on the corporate intranet.Accompanying the policy are specific procedural documents providing practical guidance on different aspects of records management. | 01-01 “*IGP002 NES Records Management Policy v2”*03-01 Minutes of Business Group and Information Governance Group approving Records Management Policy03-02 Sample NES procedure on document metadata03-03 Sample NES procedure on paper file management. | RMP3-01 Review the current Records Management Policy against Model RMP and any comments received from Keeper. Revised policy to be developed by **AUG 2013**RMP3-02 Develop a procedural document on RM and organizational change. **NOV 2013** |
| Element 4: Business classification ***A business classification scheme describes what business activities the authority undertakes – whether alone or in partnership.*** 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.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. A business classification scheme allows an authority to map its functions and provides a structure for operating a disposal schedule effectively.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. 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. 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.Read further explanation and guidance about element 4 - <http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement4.asp> | NES has an existing Business Classification Scheme which has been produced through collaborative work with other boards. This remains in iterative development alongside the implementation of an Enterprise Content Management Scheme. The BCS is a three-level functional hierarchy based on Function/Activity/Transaction.It is currently published on the intranet for consultation and awareness raising. The BCS has also been incorporated within the ECMS as the design structure for the Corporate Repository, and forms a fundamental aspect of the underlying information architecture of the ECMS moving forward. | 04-01 NES Business Classification Scheme on spreadsheet04-02 Screen capture of BCS structure in NES Enterprise Content Management System04-03 Extract minute of Information Governance Group on BCS04-04 Screen capture of Intranet page introducing BCS | RMP4-01 Continue iterative development of NES Business Classification Scheme, incorporating comments of colleagues and experiences of practical implementation. **Ongoing**RMP4-02 Continue to contribute to any NHS Scotland-wide initiatives on collaborative development of BCS. **Ongoing**RMP4-03 Assess effectiveness and appropriateness of BCS after initial phase of implementation of ECMS. **Mar 2014** |
| Element 5: Retention schedules***A retention schedule is a list of records for which pre-determined disposal dates have been established.***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. An authority’s RMP must 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). The principal reasons for creating retention schedules are:* to ensure records are kept for as long as they are needed and then disposed of appropriately
* to ensure all legitimate considerations and future uses are considered in reaching the final decision.
* to provide clarity as to which records are still held by an authority and which have been deliberately destroyed.

“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. 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. An authority’s RMP must demonstrate the principle that retention rules are consistently applied across all of an authority’s record systems.Read further explanation and guidance about element 5 - <http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement5.asp> | NES maintains an existing retention and disposal schedule. This is due for comprehensive revision to reflect organizational and procedural changes and further record series coming to light. However we are currently anticipating a national project to develop improved NHSS corporate records retention guidance to replace the current outmoded advice contained in the NHS Scotland Records Management Code of Practice.Proposed additions and amendments are captured in an interim records retention note for integration into the future schedule. | * 1. NES Corporate Records Retention Schedule
	2. NHS Scotland Records Management Code of Practice 2012
	3. NES Interim records retention notes
	4. Extract from offsite records storage lists showing destroyed life-expired records
	5. Reminder notice to staff in preparation for Edinburgh Office Moves
 | RMP5-01 Revise Corporate Records Retention Schedule once revised NHS Scotland RM CoP is available. **Nov 2013 (Contingent)** New schedule to include specific identification of Vital Records with associated mitigation and introduce a schedule of regular transfers of Board papers to NRRS. New schedule may be integrated with Business Classiciation Scheme. |
| Element 6: Destruction arrangements ***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.*** 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. An authority’s RMP must demonstrate that proper destruction arrangements are in place.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. Read further explanation and guidance about element 6 - <http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement6.asp> | All physical NES documents and records are subject to secure disposal under contract to:* Shred-It for materials disposed of directly from offices
* RSS Scotland for records disposed of from off-site storage

When office sites are vacated, Records Management staff conduct physical inspections to ensure no records are left behind.NES is implementing an Enterprise Content Management system through which it will operate its retention and disposal policy across all electronic records. This is currently being rolled out across the organization. | 06-01 NES guidance on confidential disposal of records.06-02 Guidance to staff for Edinburgh Move.06-03 Details of Shred-It security arrangements.06-04 Details of RSS disposal arrangements.06-05 Sample destruction certificates.06-06 Report of office sweeps after Edinburgh moves, Nov 2012. | RMP6-01 Update records disposal guidance to re-emphasise Model Plan requirement to “ensure that all copies of a record – wherever stored – are identified and destroyed.” **Nov 2013**RMP6-02 Deploy and operate retention management contained within ECMS Records Management console. **Jun 2014** |
| Element 7: Archiving and transfer arrangements ***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.*** 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. An authority’s RMP must 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 must be named. The person responsible for the archive should also be cited.Some records continue to have value beyond their active business use and may be selected for permanent preservation. The authority’s RMP must 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. Read further explanation and guidance about element 7- <http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement7.asp> | NES currently operates transfer arrangements with National Records of Scotland.NRS staff, having applied macro-appraisal to the organization, accept Board Papers and Minutes and hold a complete set back to the organisation’s commencementThe most recent transfer of records was in November 2012. | 07-01 – Extract from NRS catalogue07-02 Memorandum of Understanding between NES and National Records of Scotland [PENDING AS AT 26 JULY 2013]01-01 “*IGP002 NES Records Management Policy v2* | RMP5-01 Revision of retention schedule will include flagging records series to be transferred to NRS. Nov 2013RMP7-01 Add an annual task to the NES Information Governance Plan of regular transfer of Board papers to NRS. **May 2013 and ongoing**RMP7-02 Finalise MOU with NRS and submit to the Keeper as soon as possible |
| Element 8: Information security ***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.***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. An authority’s RMP must make provision for the proper level of security for its public records.All public authorities produce records that are sensitive. An authority’s RMP must 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. The security procedures must 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.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. 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. Read further explanation and guidance about element 8 - <http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement8.asp> | NES operates an existing Information Security Policy, and a range of accompanying procedures around various aspects of its IT and information estate. NES is currently undertaking a project to achieve ISO27001 (Information Security Management System) certification for its IM&T and E-Portfolio functions. NES pro-actively manages information risk through the corporate risk register and an information asset register. | 08-01 NES Information Security Policy08-02 Examples of Information Security guidance to staff08-03 Examples of ISO27001 management procedures08-04 Extract from Corporate Risk Register08-05 Extract from Information Asset Register08-06 Extract from NES Corporate Information Security Incident Register | RMP08-01 NES will achieve ISO27001 accreditation for the IT function by the end of 2013-14 RMP08-02 NES will deploy policy management software (MetaCompliance) by the end of **2014** to provide auditable record of staff knowledge, acceptance and understanding of information security and data protection policies and procedures.RMP08-03 NES will deploy port control by the end of **June 2013** to prevent downloading of data to unencrypted media. |
| Element 9: Data protection ***An authority that handles personal information about individuals has a number of legal obligations to protect that information under the Data Protection Act 1998.*** 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.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 must 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 must be afforded access to it on request. Read further explanation and guidance about element 9 - <http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement9.asp> | NES has in-place wide-ranging data protection controls including high-level procedures, staff training and guidance for specific activities.NES is moving to improve the robustness of personal data sharing through moving from having individual Information Sharing Protocols to having a corporate framework within a Data Sharing Manual identifying personal data flows and controls. | 01-02 *“IGP001 NES Information Governance Policy v2”*09-01 NES ICO registration09-02 NES Data Protection management procedure09-03 Examples of guidance to NES staff09-04 Main NES privacy notice09-05 Examples of specific NES privacy notices09-06 NES Subject Access Request procedures09-07 Extract from NES mandatory Information Governance Training09-08 Example Information Sharing Protocol09-09 NES Data Sharing Manual09-10 Data Processor Contract template | RMP08-02 NES will deploy policy management software (MetaCompliance) by the end of **2014** to provide auditable record of staff knowledge, acceptance and understanding of information security and data protection policies and procedures. (This will include key data protection messages and procedures.) |
| Element 10: Business continuity and vital records ***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****.*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.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.Read further explanation and guidance about element 10 - <http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement10.asp> | NES has robust business continuity plans for each site. These are subject to regular update.Daily network back-ups are conducted on all servers and recovery tested.NES has not previously made any separate provision for vital records, since all network content is subject to back-up protection. We will initiate a programme of vital record identification coupled with evaluation of protection.As part of the migration to electronic document management, key hard copy records have been scanned. | 10-01 Example Business Continuity Plan (sensitive data redacted)10-02 NES network back-up procedures | RMP10-01 Vital records to be identified as part of the review of the existing retention and disposal schedule by Nov **2013**RMP10-02 IG Team to review existing business continuity procedures by **Aug 2014** to assess whether they make adequate provision for vital records. (Particular attention to be paid to manual records not protected by frequent backup.) |
| Element 11: Audit trail***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.*** 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.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.Read further explanation and guidance about element 11 - <http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement11.asp> | While our records management guidance provides for tracking files, NES does not currently have formal record audit trails for most of its unstructured records.Given that the volume of and significance of paper-based corporate records is small and diminishing, we do not propose to introduce manual audit or “registry” type controls for paper records as we consider such an approach disproportionate. Our migration to electronic document management using the Alfresco software will provide adequate audit trail for corporate records held within that repository. As part of our ongoing data-quality workstream, we will also seek to identify audit capacity on corporate databases and systems in order to identify existing provision and areas for improvement. | 11-01 IG Guidance on managing paper files11-02 Extract from Alfresco software specification detailing audit functionality11-03 ECMS Implementation Plan11-04 NES Data Quality standard and questionnaire | RMP11-01 NES will continue with the implementation of Alfresco Enterprise Content Management System, including the application of audit functionality to corporate records held within the repository. **Review May 2014**  RMP11-02 The NES data quality workstream will continue the analysis and documenting of existing audit trail mechanisms within NES core systems and databases. **Aug 2013 Onwards** |
| Element 12: Competency framework for records management staff***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.***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. 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. 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. 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.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.Read further explanation and guidance about element 12 - <http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement12.asp> | NES operates adequate CPD arrangements for all staff, including its information and records professionals, allocates resources for their training, and provides records management training to all staff. Records management competencies are covered by the NHSScotland Information Governance Competency Framework 2nd Edition, which NES uses as the normative document forthis purpose, and which inform the CPD process of all staff with IG and RM responsibilities.Both designated records management staff in NES have postgraduate professional qualifications in records management from the University of Liverpool and are members of the Information and Records Management Society, (Aidan Robertson having IRMS Accredited status). | 02-01 Job description for Information Governance Manager02-02 Job description for Information Governance Officer12-01 NHSScotland Information Governance competency framework12-02 NES additional Records Management competencies12-03 Extract from Personal Development Plan of records manager12-04 CV of NES records manager | None |
| Element 13: Assessment and review ***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.***Section 1(5)(i)(a) of the Act says that an authority must keep its RMP under review.An authority’s RMP must describe the procedures in place to regularly review it in the future.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. 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. Read further explanation and guidance about element 13 - <http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement13.asp> | NES routinely includes review dates within policies and procedures. The review date for the RM Plan is August 2014. This will be included in the Forward Work Plan of the Information Governance Group. | 13-01 Document Control statement at page 2, above | RMP13-01 Progress against this Records Management Plan will be reported to the NES Information Governance Group on a quarterly basis, with a comprehensive review in **August 2014**. |
| Element 14: Shared Information ***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.*** 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.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. 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. 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.Read further explanation and guidance about element 14 - <http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement14.asp> | As noted above under Element 9, NES currently has in place Information Sharing Protocols and other appropriate arrangements with key external parties with whom it shares personal data.This is reinforced in the Data Sharing Manual.Confidentiality terms are included in all contracts with third parties | 09-01 NES ICO registration09-04 Main NES privacy notice09-08 Example Information Sharing Protocol09-09 NES Data Sharing Manual09-10 Data Processor Contract template14-01 Example MOU with GMC14-02 Example standard contract | None |

I endorse the NES Records Management Policy and the above Records Management Plan.

Signed \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Date \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Caroline Lamb, Deputy Chief Executive, NHS Education for Scotland