

DRIVING FORWARD PROFESSIONAL
STANDARDS FOR TEACHERS



Records Management Policy

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Change control

| <i>Version</i> | <i>Date</i> | <i>Detail</i> |
|----------------|---------------|-------------------------------------|
| 1 | July 2017 | New Policy |
| 2 | November 2020 | Review of Records Management Policy |
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Records Management Policy

What is this policy about?

This policy sets out our commitment to achieving high standards in records management. The policy is supported by our Records Management Plan, our Records Management and Retention Schedule as well as our Information Security Policy.

The underlying principle of records management is to ensure that a record is managed through its life cycle from creation or receipt, maintenance and use to permanent historic preservation or disposal.

Records management is vital to the delivery of our services. Our records, and the information they preserve, are an important GTC Scotland asset. By adopting this policy, we aim to ensure that the record (whatever form it takes) is accurate, reliable, ordered, useful, up to date and accessible. Effectively managing our records in this way will help us:

- Quickly and easily locate the information that we need
- Improve and develop the services we deliver
- Make informed decisions
- Make sure that we are open, transparent and responsive
- Ensure business continuity
- Protect our records by storing them securely and disposing of them at the right time
- Manage our records storage space efficiently and effectively
- Work more collaboratively across our teams/departments
- Carry out research
- Comply with relevant legislation
- Provide an audit trail to meet business, regulatory and legal requirements

This will all help to build and maintain public trust and confidence in GTC Scotland.

What does this policy apply to?

This policy applies to the management of all records received and created by us (in whatever technical or physical format and irrespective of what information they contain).

By “record” we mean recorded information (in whatever format) that has been created, received or maintained by us and that we need to keep. Examples of items that can constitute records include policy documents, disclosure/vetting certificates, reports, database entries, paper files, any items of correspondence (including letters, e-mails and faxes) and web pages.

Who does this policy apply to?

This policy applies to all staff, Council members, panel members, contractors, consultants and third parties who are given access to any of our records, where ever these may be located.

Related policies and guidance/procedures

There are a number of policies and guidance/procedures related to this policy, the most significant are listed below.

- Information Security Policy
- Records Management and Retention Schedule
- Business Continuity Plan

This policy should be read in conjunction with the above policies. The Information Security Policy particularly sets out important additional information as to how our records should be stored and handled.

Relevant legislation

GTC Scotland is a data controller with obligations set out in the Data Protection Act 2018. GTC Scotland is also a public authority with obligations under the Freedom of Information (Scotland) Act 2002 as well as the Public Records (Scotland) Act 2011 (PRSA). All of this legislation is relevant to our records management policy and procedure.

Roles and responsibilities

We all have a responsibility to ensure that our records are managed well. Everyone creates records for others, not just themselves. It should always be borne in mind that many records will be accessible to the public and that we are required to act in accordance with the law when accessing, reviewing and destroying records.

We should all ensure that records are created, filed and managed in accordance with this policy. Over and above this, specific responsibilities of certain staff members are noted below.

1 Chief Executive

The Chief Executive has overall strategic responsibility for records management. He/she is accountable for GTC Scotland's compliance with the legal requirements governing the management of records.

2 Records Manager

The records manager is answerable to the Corporate Management Team and has day-to-day operational responsibility for records management in line with this policy. He/she is responsible for:

- Providing records management guidance and support to colleagues;
- Ensuring that related records are arranged into series according to their subject matter;
- Developing and maintaining our Records Management and Retention Schedule;
- Monitoring the quality of record keeping and ensuring consistency of approach across GTC Scotland;
- Providing training on records management and maintenance; and
- Advising on historical preservation of our records.
- Undertaking quarterly assurance checks to ensure that records management mandatory requirements are being followed.

The Records Manager role is currently performed by the Information Compliance Officer.

3 Directors and Senior Managers

Directors and Senior Managers are responsible for:

- Records management in their department
- Ensuring that resources are devoted to records management and maintenance and that these are adequate for the work to be done within their department
- Ensuring that records are stored within their department appropriately and, where the content of the record requires, securely
- Ensuring that records are retained and disposed of in line with our Records Management and Retention Schedule
- Ensuring the maintenance and organisation of electronic files within their department in line with this policy so that related records are arranged in a simple and logical way with a view to ensuring that records are easy to find
- Making recommendations and requests to the Records Management Working Group about the retention and disposal of records in order to inform and update the Records Management and Retention Schedule by following the change request process managed by the Records Management Working Group.
- Providing confirmation in writing every 6 months to the Chief Executive that his/her departments' records are being managed in accordance with the Records Management policy.

4 Records Management Working Group (RMWG)

The RMWG is composed of representatives from across GTC Scotland departments and is chaired by the Records Manager. It meets regularly to help develop, promote and encourage a records management culture across the organisation where departments recognise the value and benefits of effective records management. The RMWG is a forum to discuss good records management practice as well as to review and inform records management policy and guidance.

The RMWG also manage requests for changes to the Records Management and Retention Schedule including requesting final approval for the change from Corporate Management Team (CMT).

Storage of records

All records must be held electronically. As far as possible, a record should be retained and filed in one place only in order to facilitate the appropriate, and secure, retention of the record. It is understood that, for practical reasons, records may be copied to a personal drive or may be stored in multiple places for whatever reason but any such duplicate copies must be destroyed as soon as possible when they are no longer so required.

Electronic records

All records must be held electronically and should be filed within the appropriate directories and sub-directories within GTC Scotland's storage systems (e.g. MyOfficeData (the Hub) and the Atlas registration database). Records should be grouped together appropriately

within a simple and logical filing system with a view to ensuring that records are easy to find. GTC Scotland records should not be stored on personal drives or workspaces.

When filing (or saving) electronic records to the Hub, the following must be adhered to:

- Use short, simple and clear folder names
- Create simple hierarchical structures - keep to three levels of folders/documents
- Do not mix up folders and documents on a page
- Name files in a consistent way using the following structure:
 - Date
 - Unique identifier
 - Title
 - Version
- Do not use spaces when creating and saving documents
- Always use hyphens to separate words (-)
- Do not use illegal characters when naming files (e.g. ! # \$ % ' @ & ^ ~ + , . ; = () /)

Confidential or sensitive electronic records should be placed in secure folders so that they may only be accessed by authorised staff members. It may also be appropriate to password protect such records to ensure confidentiality is appropriately maintained.

Paper records

GTC Scotland promotes that records must be held in an electronic format. Where it is necessary to store paper records that are in active use these will be stored by the relevant department appropriately. Any records which contain personal data and are therefore considered to be of a confidential or sensitive nature must be stored securely, in locked cabinets. Disclosure or vetting certificates must, in particular, be stored in non-portable, lockable storage units and be subject to controlled access arrangements.

GTC Scotland does not use external sites for archiving its own records (other than National Archives Scotland – this is where the records that are of enduring corporate value are transferred and stored permanently). Should any such sites be used, appropriate logging and communication systems will be put in place. The records will also be available for re-call within a reasonable time period.

Handling of records

As we handle information that may be of a confidential or sensitive nature, for example disclosure/vetting and other sensitive fitness to teach information, care must be taken to ensure that the information is only shared with those who require it to undertake their role within GTC Scotland. Where any confidential or sensitive information is transmitted, this must be done securely.

Retention of records

Records should be retained in accordance with our Records Management and Retention Schedule. Where possible, electronic record folders should be set and structured appropriately to facilitate the automatic destruction of records at the end of the retention period applicable.

Disposal of records

Once scanned, paper records should be placed in the confidential waste paper bins situated around Clerwood House ensuring that they are securely shredded on GTC Scotland premises by our approved supplier. Any other physical records that require to be destroyed (for example discs or tapes) should be provided to the Records Manager and special arrangements will be made for these to be securely destroyed by our approved supplier.

Electronic records should be deleted appropriately and guidance sought from the Technical Support Team as required. Hardware (e.g. laptops) is subject to destruction arrangements that are overseen and authorised by the Technical Support Team.

Review of this policy

We will regularly review this policy and keep it up to date in conjunction with the assessment and review of our Records Management Plan (as required under the PRSA).

Compliance with this policy will be reviewed regularly by the Records Manager. Directors will submit statements to the Chief Executive and Records Manager twice a year (every April and October) to demonstrate and confirm their current and ongoing compliance with the requirements.