RECORDS MANAGEMENT AUDIT PROCEDURE

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VERSION HISTORY

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0.1	18/07/2019	Final draft
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1.   Why do we need a Records Management Audit Procedure?

The key compliance legislation for Records Management in all public sector organisations in Scotland is the Public Records (Scotland) Act 2011 (PRSA).

The PRSA places a requirement on Food Standards Scotland (FSS) to submit a Records Management Plan (RMP) to be agreed by the Regulator (The Keeper of the Records of Scotland) and to provide an annual report on the status of each of the 15 defined standards for records keeping and management.

The Records Management Audit Procedure sets the benchmark to measure FSS records management performance and culture against the PRSA standard.

This approach provides a flexible and sustainable maturity model for measuring FSS records and information management practices, and to highlight areas for continuous improvement.

2.   Benefits of a Records Management Audit include:

- Measuring records management performance against defined PRSA standard;
- Monitoring adaptable deliverables of RMP and Progress Update Review (PUR) Report;
- Raising staff awareness on key elements of the RMP e.g., Business Continuity, Data Protection, Information Security etc.;
- Competency framework for records management staff and continuous improvement;
- Presenting managers and staff with straightforward records and information management requirements to comply with PRSA, GDPR and DPA 2018.

All staff who create, receive, and use records in the course of their day to day tasks and activities are responsible for ensuring records are managed appropriately – FSS Records Management Policy

3.   Scope, Key Risks and Approach

3.1   Scope

    I.   To assess and evaluate the correct keeping and effective management of records by FSS against the defined standard of the 15 elements of the PRSA. This review forms part of FSS information assurance and governance of internal controls.

    II.   This review is compliance based referencing the requirements of the PRSA 2011 and GDPR/DPA 2018 (Element 9: Data Protection).

3.2   Key Risks

    I.   This audit procedure is set against the model RMP that was assessed corporately by the Records Manager against the PRSA standards. Although presentations and awareness events have been carried out across FSS business areas, some staff especially field based staff may be unaware of the requirements of the PRSA.

    II.   The Assessment made on FSS RMP is descriptive of the information management culture across the organisation as well as aspirational to include business areas that have not yet achieved the very high standard set for information and records management in FSS.

By managing information appropriately, FSS will ensure that it can work in a more efficient manner, as staff will be able to create, locate, understand, and retrieve information as and when required – FSS Records Management Policy.

3.3   Approach

    I.   Information Management Support Officers (IMSOs) in collaboration with colleagues within their respective branches to review the records and information management practices/culture in their branch areas using the template in Annex A.

    II.   Focus of the branch review is on each aspect of the PRSA standards, what does good look like within the branch, what is required to meet the standards; and any comments and recommendations.

    III.   Records Manager to answer and record any questions raised by branch business areas into a Question and Answer (Q&A) document for consistency, ease of reference, training and staff induction purposes.

IV. Records Manager to provide assistance as required during and after the audit;

V. Having obtained the self-assessment completed by branches using Annex A template, Records Manager to collate the responses into a single report to present to Senior Management Team (SMT) and Senior Information Risk Owner (SIRO) with Action Points to address any area for improvement highlighted in the self-assessment;

VI. Once the report has been approved by SMT/SIRO, it then becomes a working document for implementation by Records Manager and FSS;

VII. Audit outcome to further feed into RMP Progress Update Review Report.

For further information and queries on Records Management Audit, contact: informationmanagement@fss.scot.

Annex A: FSS - Records Management Audit Against PRSA Standards

Use the table below to provide an assessment of the records/information management practices and culture within your branch business areas.

PRSA Elements	PRSA Standards	Assessment (Please select which category best describes your branch business area(s) against each element of PRSA. If selecting categories 2 or 3, please outline what provision is in place including any comments/recommendations to meet the required PRSA standard	Provision in place including comments and recommendations (not more than 200 words per element)
Element 1: **Senior Management Responsibility**	• Awareness of FSS Deputy Chief Executive Officer as the Senior Information Risk Owner (SIRO) who has overall strategic accountability for records management in FSS • The SIRO is a Senior level staff with authority to endorse FSS RMP and to ensure the required improvements to records management procedures are implemented corporately and monitored by the Records Manager.	Choose an item.	

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Element 2: **Records Manager Responsibility**	• Understanding of Records Manager's responsibilities • Provision of feedback to the Records Manager on general communication and the day – to-day records management operations and activities within your branch	Choose an item.	
Element 3: **Records Management Policy Statement**	Understanding of: • FSS Records Management Policy • Importance of records management in FSS • Approach for records management from their creation to their ultimate disposal or archive	Choose an item.	
Element 4: **Business Classification**	• Understanding of functions and business activities of FSS	Choose an item.	

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	• Awareness of the information assets your branch creates and maintains		
Element 5: **Retention Schedules**	• Awareness of FSS retention and disposal schedules • Awareness and compliance with FSS provision for the archiving and destruction or other disposal of FSS Public Records	Choose an item.	
Element 6: **Destruction Arrangements**	• Understanding of the procedure for in-house secure disposal of records • Adopts appropriate security precautions approach when disposing of personal and sensitive records	Choose an item.	
Element 7: **Archiving And Transfer Arrangements**	• Identified corporate records of enduring value within branch for permanent preservation at	Choose an item.	

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	the National Records of Scotland or The National Archives (if applicable). • Awareness of and actively transfers corporate records out of personal email accounts to corporate records repositories (e.g., eRDM).		
Element 8: **Information Security**	Complies with : • FSS Information Security Management Policy • FSS Electronic Communication Policy • FSS Risk Management Policy • FSS Clear Desk Policy • FSS Access Control Policy • SG/iTECS IT Code of Conduct • Completes annual SG "Data Protection" and "Managing Information" Training courses	Choose an item.	

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Element 9: **Data Protection**	• Understands individual and branch obligations under the GDPR and DPA 2018 • Completes the annual SG Data Protection eLearning course • Complies with FSS Data Protection Policy • Understands the measures and guidance for the protection of all personal and special category of data in FSS • Understands FSS data breach reporting procedure	Choose an item.	
Element 10: **Business Continuity And Vital Records**	• Already identified vital records within branch for business continuity purposes • Understands FSS Business Continuity and Disaster Recovery Plan	Choose an item.	

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Element 11: **Audit Trail: Tracking and Version Control**	• Uses a document control section to evidence changes to official documents • Ensures that all bespoke information processing systems used in branch have appropriate audit logs/audit trail. • Uses FSS Corporate Memory Capture Procedure or adapts the procedure within branch to capture/monitor the movement of records within branch	Choose an item.	
Element 12: **Records Management Training for Staff**	• Completes SG eRDM training before gaining access to the system • Completes the annual Civil Service Protecting Information training	Choose an item.	

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	• Completes SG Information Management Principles Training		
Element 13: **Assessment And Review**	• Conducts regular review of standard operating procedures, Guidance documents, Policies and Procedures, etc.	Choose an item.	
Element 14: **Shared Information**	• Protects and manages all personal data including special category of personal data • Uses secure tools and channels for sharing information e.g., eRDM Connect, Data sharing Agreement and protocols • Understands FSS Data Sharing Template and Guidance	Choose an item.	

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Element 15: **Public Records Created or held by Third Parties**	• Have adequate and appropriate arrangements for managing FSS records created and maintained by a third party provider through contractual clauses and monitoring procedures • Uses appropriate procurement documentation and contractual clauses referencing contract monitoring and "end–of-contract" procedures • Have clearly defined schedules for the retention and disposal of records created by third parties during and after the duration of the contract	Choose an item.	