

Records Management Plan

South Lanarkshire Council Records management plan

Covering statement

I am pleased to submit South Lanarkshire Council's records management plan for assessment by the Keeper of the Records of Scotland.

Under the terms of the Public Records (Scotland) Act 2011, South Lanarkshire Council is obliged to produce a records management plan (RMP), submit the plan to the Keeper of the Records of Scotland for agreement and ensure that the Council's records are managed in accordance with the plan as agreed with the Keeper.

This records management plan includes arrangements for the South Lanarkshire Licensing Divisions as well as South Lanarkshire Leisure and Culture (SLLC) Ltd.

This records management plan applies to all records irrespective of the technology used to create and store them or the type of information they contain.

South Lanarkshire Council has used the format suggested in the Keeper's Records Management Plan Guidance. As such the RMP consists of 14 elements in the order given by the guidance and provides content and evidence as appropriate against each element. South Lanarkshire Council is fully aware of the importance of demonstrating that it can manage its corporate records effectively. The records management plan will deliver improvements in business efficiency, helping us to carry out our statutory functions and to provide a valued service to the public.

Since the implementation of the Public Records (Scotland) Act 2011, South Lanarkshire Council has been carrying out work to improve its records management activities. Corporate policies and procedures on the management of information and records have been reviewed and new policies developed where required. South Lanarkshire Council has an Electronic Document and Records Management System (EDRMS) for some of its business functions and this continues to be developed and rolled out across Council functions as appropriate.

I fully endorse this records management plan and support the good work that each of South Lanarkshire Council's Resources are devoting to the improvement of records management.

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Introduction

South Lanarkshire Council recognises the operational and legal importance of sound governance of its information assets and information governance principles will be applied to a standard that complies with legislative requirements.

In 2010 the Council set up an Information Governance Board upon which all of its Resources (departments) are represented including a representative of South Lanarkshire Leisure and Culture and a representative of the Trade Unions. The board meets monthly and reports to the Corporate Management Team on a regular basis making recommendations on information governance related issues. It also develops and agrees strategic and operational procedures which are then implemented within each of the Resources.

Within Resources information governance issues are also considered on an operational level by senior management teams.

Information governance is included on the Council Plan, Connect 2012 – 2017.

Given information governance's importance in the provision of services to the people of South Lanarkshire, the Council resource planning process incorporates a number of performance measures relating to information governance. Each Resource has developed a suite of performance measures against specific actions which assist the Council in the improvement of information management. These measures are reported quarterly on the Council's performance measurement reporting system IMPROVe.

The Council produces an annual risk register. A report to the Risk and Audit Scrutiny Forum dated 19 January 2016 highlighted "Information management not subject to adequate control" as being number four in the Council's top risks. In recognition of the importance of this risk, Resources are required to include actions to mitigate this risk in their Resource and Service plans.

Requirement	Senior management responsibility is the single, most important piece of evidence to be submitted as part of South Lanarkshire Council's records management plan. This element must identify the person at senior level who has overall strategic responsibility for records management within the organisation.
Statement of compliance	The Senior Responsible Officer for records management within South Lanarkshire Council is the Executive Director, Finance and Corporate Resources. The Executive Director is also Senior Information Responsible Officer (SIRO) for South Lanarkshire Council.
	Also in included within the scope of this records management plan are the records of South Lanarkshire Leisure and Culture and South Lanarkshire Licensing Board.
	South Lanarkshire Leisure and Culture South Lanarkshire Leisure and Culture Ltd (SLLC) is responsible for the operation, management and development of indoor and outdoor sport and leisure facilities, community halls, arts venues, country parks, libraries and museums and associated initiatives and events throughout South Lanarkshire.
	The Senior Responsible Officer for records management in SLLC is the Company Secretary. SLLC work closely with South Lanarkshire Council in terms of arrangements for records management.
	South Lanarkshire Licensing Board South Lanarkshire Council has four Licensing Divisions which are divided by area as follows: Clydesdale; East Kilbride, Hamilton, and Rutherglen and Cambuslang. Each of these Licensing Divisions has its own members who meet on a regular basis to agree applications originating from the area concerned.
	The Senior Responsible Officer for records management in South Lanarkshire Licensing Board is the Clerk to the Board. The Clerk to the Board is also chair of the Information Governance Board. The records of the South Lanarkshire Licensing Divisions are subject to the same policies and controls as those of South Lanarkshire Council.
	Evidence to be submitted in support of Element 1 includes:
	Item 001 Statement of responsibility/cover letter Item 002 Records management policy Item 003 Letter from SLLC Company Secretary Item 004 Letter from Clerk to South Lanarkshire Licensing Board
	There are no planned future developments in respect of Element 1.
Assessment and Review	This element will be reviewed as soon as there any changes in personnel.
Responsible Officer(s)	Executive Director (Finance and Corporate)
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Element 2: Records management responsibility (mandatory)

Requirement	Records manager responsibility must identify the individual within the organisation, answerable to senior management, to have operational responsibility for records management within the organisation
Statement of compliance	The officer with operational responsibility for records management within South Lanarkshire Council is the Administration Adviser, Administration and Legal Services, Finance and Corporate Resources. The Administration Adviser has a corporate role with regard to information and records management within South Lanarkshire Council and is also responsible for the Archives and Information Management Service which includes the management of the South Lanarkshire Council Archives and Records Centre. This is a role she has undertaken for the past 9 years. The Administration Adviser is a member of the Information Governance Board which reports to the Corporate Management Team. The Administration Adviser is also responsible for developing and coordinating the main information governance, records management and information security policies which have been agreed by the Council.
Evidence of compliance	Evidence to be submitted in support of Element 2 includes: Item 005 Executive Committee report 8 October 2014 IGB update approving responsibility. Item 001 Covering letter from Chief Executive Item 006 Administration Adviser job specification
Future developments	There are no planned future developments.
Assessment and review	This element will be reviewed as soon as there any changes in personnel.
Responsible officer(s)	Administration Adviser Finance and Corporate Resources South Lanarkshire Council Council Offices Almada Street Hamilton ML3 0AA

Element 3: Records management policy statement (mandatory)

Requirement	The Council's records management policy together with the Council's information strategy demonstrates the Council's commitment to managing records within the organisation. It clearly sets out the Council's priorities and intentions in relation to recordkeeping, and delivers a supporting framework and mandate for the development and implementation of a records management culture.
Statement of compliance	South Lanarkshire Council has had a records management policy since 2006. This is reviewed regularly with the most recent review having taken place during 2015 and a new policy approved by the Executive Committee in May 2016. An information strategy, developed and approved by the Information Governance Board was approved by the Executive Committee on 8 October 2014.
Evidence of compliance	 Evidence to be submitted in support of Element 3 includes: Item 002 Records management policy Item 007 Executive Committee report dated 11 May 2016 seeking approval of Records management policy Item 008 Management bulletin Records management policy Item 009 Personnel Circular Records management policy Item 010 Information strategy Item 011 Information strategy improvement plan Item 012 Executive Committee report dated 8 October 2014 seeking approval of Information strategy Item 013 Management Bulletin Information strategy Item 014 Personnel Circular Information strategy Item 015 Core Brief Information strategy and Information security policy Item 016 Policies and procedures review schedule Item 017 Intranet screenshot – Information governance Item 019 Intranet screenshot – Information management policies Item 020 Information strategy – South Lanarkshire Leisure and Culture
Future developments	There are no planned future developments in respect of Element 3.
Assessment and review	The records management policy and the information strategy will be reviewed by the Information Governance Board in 2021 and 2017 respectively.
Responsible officer(s)	Administration Adviser

Element 4: Business classification

Requirement	The Keeper expects an organisation to carry out a comprehensive assessment of its core business functions and activities, and represent these within a business classification scheme (BCS). It is expected that Element 4 should confirm that the organisation has developed or is in the process of developing a BCS.
Statement of compliance	South Lanarkshire Council organises its records according to agreed retention schedules. This will be described in more detail in Element 5. These retention schedules are created according to the service function, activity and the transactional records created as part of these functions. Each record has its own unique record series code linked to its retention and disposal fate. The hierarchical representation of the Council's business functions is presented in the form of the master retention schedule spreadsheet. The spreadsheet is kept up to date as service functions are reviewed or new activities are introduced. This forms the basis of the Council's business classification scheme.
	South Lanarkshire Council also has in place an Electronic Document and Records Management System (EDRMS). The system went live in 2009. Business functions currently using EDRMS include Planning and Building Standards, Housing Benefits and Revenue, Freedom of Information requests, and Social Work. It is also being used by Community and Enterprise Resources for all of the business areas within that department. The EDRMS uses the first 2 levels of the Local Government Classification Scheme (LGCS) on which to base the file plan of the system. Below that are further locally agreed levels that form the electronic business classification scheme. Retention schedules have been drawn up for the records included in the EDRMS and these are included in the master retention schedule spreadsheet as described above.
	In other business areas of the Council, records are stored on a shared network drive which is organised into file structures based on departments. These shared network drives correspond to the functions and activities included in the master retention schedule spreadsheet as mentioned above. However, it is recognised that there is also an element of uncontrolled activity within the network. To assist employees in the management of files in the network structure, a suite of guidance documents has been developed including Structuring Your Shared Drive, Naming Conventions, Version Control and Email Management.
	Over the past 3 years, South Lanarkshire Council has been carrying out a Council wide information audit. Each Resource across the Council has identified its service and business functions and the records that are created within each function. This has resulted in improvements in the master retention schedule, retention schedule reviews taking place and gaps being identified.
	The Information Audit was developed by the Administrative Adviser in conjunction with the Information Governance Board. It was completed by nominated representatives across the Council selected to undertake this task. The resultant audit returns were used to create in depth record retention schedules for each service. The creation of retention schedules and review of existing retention schedules is ongoing work for the corporate records management team.
Evidence of compliance	Evidence to be submitted in support of Element 4 includes:Item 021 Master retention schedule spreadsheet

	 Item 022 EDRMS file plan extract Item 023 EDRMS update report to Corporate Management Team 19 November 2015 Item 024 Information Management Senior Management Team Report (Community and Enterprise Resources) 12 February 2016 Item 025 EDRMS user guide Item 026 Information audit example – Anti Social Behaviour Services Item 027 Information audit example – Finance Services Item 028 Email to managers re implementation of information audit Item 029 Amenity Services – information audit progress Item 031 Planning and Building Standards Services – information audit progress Item 032 Structuring your shared drive – guidance
	 Item 033 Naming conventions – guidance Item 034 Version control – guidance Item 035 Email management – guidance Item 036 Records management good practice guides – intranet screenshot
Future developments	The Council operates a well established and robust records management system for its records. Retention scheduling is a key tool in helping to identify and manage the Council's records and information. There are currently gaps in the service but these are being addressed through the information audit and the development of a retention scheduling programme to ensure coverage of all business functions. South Lanarkshire Council does not currently have a corporate file plan however further business functions are expected to be rolled out into the EDRMS where they will be captured according to a single business classification based on the top two levels of the LGCS.
	The Council's current EDRMS is reaching end of life at 31 March 2017. The Council is currently seeking a replacement solution to manage its corporate records. Other solutions are also being sought for the Planning and Building Standards Service and Revenue and Benefits Service.
	Other electronic records not captured by the EDRMS will be managed in the shared network according to the suite of best practice guidance issued by the Council.
	As business functions are migrating to the EDRMS, departments are moving away from storing electronic records in unstructured shared drives. There are also many records held in departmental business systems in the various Resources of the Council. These legacy systems are being reviewed and improvements made where possible. Where new systems are being procured, records management functions are being highlighted in the procurement process.
Assessment and review	The process of reviewing and updating the records retention schedules will be an ongoing piece of work to ensure accuracy of the hierarchical representation of the Council's records within the master retention schedule spreadsheet.
Responsible officer(s)	Administrative Adviser

Element 5: Retention schedules

	
Requirement	Retention schedules must demonstrate the existence of and adherence to corporate records retention procedures. These procedures must show that the organisation routinely disposes of information, whether this is destruction or transfer to an archive for permanent preservation. A retention and disposal schedule which sets out recommended retention periods for records created and held by an organisation, is essential for ensuring that the organisation's records are not retained longer than necessary (in line with legal, statutory and regulatory obligations), storage costs are minimised (through the timely destruction of business information), and records deemed worthy of permanent preservation are identified and transferred to an archive at the earliest opportunity.
Statement of compliance	South Lanarkshire Council has operated an off-site Records Centre and Archive since its inception in 1996 to store its semi-current, closed and archival paper records. The Council uses retention scheduling as a records management tool for the routine storage, management and disposal of information. Retention schedules are individually developed for each service taking into account legislation, best practice, administrative and operational need and long term archival value. The Scottish Council on Archives Record Retention Schedules (SCARRS) are used as a reference tool in the development of the retention schedules. All schedules are signed off by the responsible Head of Service.
	As described in Element 4, the Council's business functions are represented in the Master retention schedule spreadsheet which outlines each function and the transactional records created as a part of these functions.
	Not all business functions are currently covered by retention schedules but the information audit has identified the gaps in coverage and a programme of retention schedule review and development has been introduced to address these.
	South Lanarkshire Leisure and Culture have also been included in the programme of retention schedule development with retention schedules being developed for each of their areas of activity. SLLC also use the Records Centre for off-site storage.
	Records created by South Lanarkshire Licensing Board are included in the retention schedule created for Licensing Services. These are subject to the same controls and procedures as South Lanarkshire Council records.
	The retention schedules provide retention advice regardless of media format. However, to date, the records centre is unable to accept transfer of electronic records so it is the responsibility of each business function to implement good records management practice for the retention and storage of their electronic records in their native system.
	A programme of developing retention and disposal rules has been initiated for records contained in the EDRMS. These disposal rules are based on agreed retention schedules developed for the business function. This will be progressed in the replacement EDRMS procured by the Council.
	A separate vital records register was developed in 2010 and the Information Audit 2013-2015 continued to build on the information gathered in the 2010 register. The vital records register is reviewed annually.

Evidence of compliance	 Evidence to be submitted in support of Element 5 includes: Item 021: Master retention schedule spreadsheet Item 037: Retention and disposal procedural guide Item 038: Retention and disposal policy Item 039: Retention and disposal policy Executive Committee report 23 September 2015 Item 040: Retention schedule sample Environmental Services Item 041: Retention schedule sample South Lanarkshire Leisure and Culture HQ Item 042: Retention schedule sample Legal Services (includes Licensing Board) Item 043: EDRMS example of disposal schedule Item 044: Housing and Technical Resources retention scheduling action plan Item 045: Example vital records schedule
Future developments	All Council business functions will be covered by a retention schedule. The information audit has identified gaps in coverage and a records retention scheduling programme is being developed to action this. Retention and disposal rules will continue to be applied to records contained in the EDRMS which are based on agreed retention schedules developed for the business function. Records held in business systems other than in the EDRMS will be reviewed and the Council will introduce a programme to introduce retention rules where possible. The vital records schedules will continue to be reviewed annually. A programme for reviewing record retention schedules will be introduced.
Assessment and review	The Records Manager will be responsible for monitoring and reviewing the retention schedules on a rolling basis as well as making amendments on existing schedules as required ensuring that they continue to reflect recordkeeping best practice as well as legal and statutory obligations.
Responsible officer(s)	Administrative Adviser

Element 6: Destruction arrangements (mandatory)

Requirement	Destruction arrangements should evidence the arrangements that are in place for the secure destruction of confidential information. Clear destruction arrangements detailing the correct procedures to follow when destroying business information are necessary in order to minimise the risk of an information security incident and ensure that the organisation meets its obligations in relation to the effective management of its records, throughout their lifecycle.
Statement of compliance	South Lanarkshire Council has an arrangement in place with PHS Datashred to provide a confidential paper waste disposal service and a confidential disposal service for storage media such as CDs, DVDs, tapes and flash drives. The arrangement covers all Council buildings including the Archives and Record Centre and South Lanarkshire Leisure and Culture.
	Confidential Waste Disposal Guidelines were developed in 2014 by the Information Governance Board and have been communicated to employees. Awareness of the procedure has been cascaded to all staff using the Council's well established personnel circular process.
	Electronic records and information stored on the Council's network must be disposed of as per agreed retention schedules. It is the responsibility of each business function to manage their electronic records so that they can comply with expiry periods. The Council has produced guidance to assist business functions with this including version control, email good practice guide, file naming conventions and structuring your shared drive.
	Records in the EDRMS are to be destroyed according to disposal schedules based on agreed retention schedules developed for the business function. This is overseen by Local Records Managers within each business function.
	Hardware disposal arrangements The Council has contractual agreements in place with ATOS (formerly Bull Information Systems) for the provision of server and storage supply and support services which includes the destruction of hardware plus the digital destruction of any residual data residing on the disks of servers due for destruction. This destruction is discharged to international standards and periodically checked by independent assessors. For PCs and laptops the Council has a managed desktop contract with Computacenter which involves the refresh of the Council's PCs and laptops and the eventual destruction of the hardware.
	IT Network Back Up Procedure The Council also has a contract in place with ATOS to manage the back-up procedures for the entire network. The back-up is carried out to disk. There are servers in two separate locations and mutual back ups are carried out between these locations. A weekly back up is carried out each Sunday with an incremental back up carried out each night in between. There is a 3 month retention period applied.
Evidence of compliance	 Evidence to be submitted in support of Element 6 includes: Item 046: Confidential waste disposal guidelines Item 038: Retention and disposal policy Item 047: Certificate of destruction - example Item 048: Confidential waste agreement with contractor

	 Item 049: Note of site visit to waste contractor Item 050: Personnel circular re confidential waste Item 051: Extract from destruction register Item 043: EDRMS example of disposal schedule Item 052: Server contract – ATOS (Bull Information Systems) Item 053: Desktop contract – Computacenter
Future developments	South Lanarkshire Council went out to tender for confidential waste disposal services. The tender is now in the process of being awarded and it is expected that the new contract will commence in or around February 2017. The contract is for the supply and servicing of lockable confidential waste consoles in council buildings to store all confidential waste until collection by a third party contractor for confidential destruction. The Confidential waste guidelines will be amended to reflect any agreed changes in procedure. The Keeper of the Records of Scotland will be informed of any changes. Council Resources will take forward proposals to develop disposal procedures for electronic records held on business systems.
Assessment and review	The Confidential waste procedures will be monitored and reviewed by the Administration Adviser and Information Governance Board.
Responsible officer(s)	Administrative Adviser

Element 7: Archiving and transfer arrangements (mandatory)

Requirement	Archiving and transfer arrangements should detail the processes in place within an organisation to ensure that 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 fully and accurately preserved.
Statement of compliance	South Lanarkshire Council has responsibility for South Lanarkshire Archives HMS Repository Code GB1828. South Lanarkshire Council Archives Service aims to collect, preserve and make available to the public the official records of South Lanarkshire Council and its predecessor authorities as well as private records of historical or research value relating to the South Lanarkshire area. The Keeper has issued Supplementary Guidance on Proper Arrangements for Archiving Public records and the Council recognises the importance of working in accordance with the principles outlined in this guidance. Services in the Council that have records of long term historical value as
	identified in their retention schedules should transfer their records to the archive annually for permanent preservation. The Council also accepts deposits from outside bodies if relevant to the Council's Collection, Transfer and archiving policy. This includes the historical archives of South Lanarkshire Leisure and Culture. A deposit form is used giving terms and conditions of deposit. No electronic records are currently transferred because the Council's archive does not have an electronic repository however electronic records are identified as part of the retention scheduling process and where appropriate these are flagged up as having continuing value and therefore special care must be taken to ensure their continuous accessibility via the IT service.
Evidence of compliance	 Evidence to be submitted in support of Element 7 includes: Item 054: Collection, transfer and archiving policy Item 055: Collection, transfer and archive policy Executive Committee report 23 September 2015 Item 038: Retention and disposal policy Item 056: Personnel Circular Retention and disposal policy and collection, Transfer and archiving policy Item 057: Example catalogue F29 Keith and Patrick Item 058: Collections summary Item 060: Accession register Item 061: Example accession: Strathclyde Building Preservation Trust Item 062: Extract from SLLC agreeing transfer of archives to South Lanarkshire Council Archive Item 063: Collection, transfer and archiving policy – South Lanarkshire Leisure and Culture Item 064: Retention and disposal policy - South Lanarkshire Leisure and Culture Item 065: Management Bulletin Retention and disposal policy and Collection, transfer and archiving policy - South Lanarkshire Leisure and Culture

Future developments	There is currently no provision in the Council for accepting electronic transfers to the archive. However the Council is continuing to raise awareness across the Council on the importance of managing electronic records especially those of continuing value so that they remain as useable and accessible as possible until such time as a solution for electronic transfer to archive has been identified.
	Digital preservation and archiving has been identified as an area requiring attention by the Information Governance Board and the future direction of the Council's policy will be developed.
Assessment and review	The policy is to be reviewed regularly by Administration Adviser and Information Governance Board.
Responsible officer(s)	Administrative Adviser

Element 8: Information security (mandatory)

Requirement	South Lanarkshire Council must make provisions for the proper level of security of its records. There must be evidence of robust information security procedures that are well understood by all members of staff. Information security policies and procedures are essential in order to protect an organisation's information and information systems from unauthorised access, use, disclosure, disruption, modification, or destruction.
Statement of compliance	South Lanarkshire Council has based its Information security policy on the international security management standard ISO27001. The policy was reviewed in 2014 to strengthen it in terms of arrangements for manual records. The reviewed policy was approved by the Executive Committee on 8 October 2014. Employees have been briefed by means of a Personnel Circular and Management Bulletin which were circulated to all staff on 3 December 2014 followed up by a Core Brief on 15 December 2014. The Council has an online training system called Learn On Line. A Learn On Line training course was developed on information security and key employees have been instructed to undertake this course. The Council also has in place an information security incident management procedure and a Data Protection information security incident reporting procedure. Incidents are monitored via the Information Governance Board. The Council's risk register has highlighted "Information management not subject to adequate control" as being the Council's fourth top risk. This has elevated the importance of information security within the Council's management and has resulted in measures to mitigate this risk being incorporated into Resource and Service plans. The Council has an Information Security Manager in place within whose remit the security of electronic information security lies. Following the launch of the revised Information security policy, a programme of employee guidance and briefing notes on information security topics have been circulated to employees. These include guidance on Accessing records containing personal and sensitive information, Emailing and general correspondence containing personal, sensitive personal and confidential information. Information security while out of the office, Disclosing confidential information.
Evidence of compliance	 Evidence to be submitted in support of Element 8 includes: Item 066: Information security policy Item 067: Executive Committee report dated 8 October 2014 seeking approval of Information security policy Item 068: Personnel Circular on Information security policy Item 069: Management Bulletin on Information security policy Item 015: Core Brief on Information strategy and Information security policy Item 070: Core Brief on Information security incident reporting procedure Item 071: Information security incident log – template Item 072: IT security incident escalation process Item 074: IT acceptable use policy

	 Item 075: Core Brief on IT acceptable use policy Item 076: Core Brief on laptop security Item 077: Risk and Audit Scrutiny Forum report risk management update 19 January 2016 Item 078: Information security : Learn On Line online training course – screenshot Item 079: EDRMS access controls example Item 080: EDRMS access group example 01 Item 081: EDRMS access group example 02 Item 082: Confidentiality agreement – personnel Item 083: Employee communications plan Item 084: Employee guidance – Accessing records containing personal and sensitive information Item 085: Core Brief on Accessing records containing personal and sensitive information Item 086: Employee guidance – Information security while out of the office Item 088: Employee guidance - Emailing and general correspondence containing personal, sensitive personal and confidential information Item 089: Employee guidance - Disclosing confidential information Item 090: Personnel Circular on Disclosing confidential information Item 091: External supplier access form Item 092: Third party network code of connection Item 093: Internal Briefing Paper – Data loss prevention – USB ports Item 095: Management Bulletin – Information security policy South Lanarkshire Leisure and Culture
Future developments	Information security has been highlighted as a top priority for the Council and there will be ongoing employee briefings and circulars.
Assessment and review	The suite of information security policy documents are reviewed and monitored by the Information Governance Board.
Responsible officer(s)	Security Manager (IT), Information Compliance Manager, Administration Adviser

Element 9: Data Protection

Requirement	The Keeper expects an organisation to provide evidence of compliance with data protection responsibilities for the management of all personal data.
Statement of compliance	South Lanarkshire Council has a legal obligation to comply with the requirements of the Data Protection Act 1998, in relation to the management, processing and protection of personal data.
Evidence of compliance	South Lanarkshire Council is registered as a Data Controller on the Information Commissioner's Data Protection Register. Its registration number is Z774916X.
	South Lanarkshire Leisure and Culture is registered as a Data Controller on the Information Commissioner's Data Protection Register. Its registration number is Z8106099.
	South Lanarkshire Council Licensing Divisions are not independently registered as Data Controllers but the records created within this function are managed within the auspices of the Council and as such fall within the data protection arrangements that are in place.
	Details of both South Lanarkshire Council's and South Lanarkshire Leisure and Culture's registrations can be viewed on the Information Commissioner's website www.ico.org.uk under Register of Data Controllers.
	As part of its daily business of delivery services to the people of South Lanarkshire, the Council requires to collect and process personal and sensitive information about its customers, residents, employees and other relevant individuals. In doing so the Council is careful to protect the rights of individuals and to put in place procedures and controls to make sure this information is secure and managed appropriately. There are two core policies in place. The Privacy policy outlines how the Council handles its customers' personal and sensitive information and how it complies with the 8 principles of the Data Protection Act. The Information Requests Compliance policy outlines how the Council will deal with any requests for information made to it including data subject access requests, Freedom of information requests and Environmental information requests and how it complies with the various legislation.
	The Council's Information Compliance Manager has responsibility for providing guidance on responses to data subject access requests.
	The Council also has a Senior Information Risk Owner (SIRO) who takes overall responsibility for the security and management of information being held and being processed.
	South Lanarkshire Council examined its holdings of data with included personal and sensitive details by means of a privacy audit. This enabled the Council to strengthen its policies and procedures concerning the processing of personal and sensitive information.
	Data Protection training is being built into the Council's core training plan with key job roles being identified for automatic enrolment in a suite of data protection training courses on the Council's online learning system.
	The Council's Information Governance Board regularly reviews data protection issues. There is a system in place for reporting information security incidents,

	ensuring that remedial action is carried out, lessons are learned and that new processes put in place where necessary.
	The Council has introduced a "Privacy by Design" process whereby privacy impact assessments are required to be carried out for any new uses of personal and sensitive personal data. The privacy impact assessments are reported to the Council's corporate management team on an annual basis.
	Evidence to be submitted in support of Element 9 includes:
	 Item 096: Privacy policy Item 097: Information requests compliance policy Item 098: Data sharing policy Item 099: An Introduction to the Data Protection Act Learn on Line training screenshot
	 Item 100: How Data Protection works Learn on Line training screenshot Item 101: Data sharing Learn on Line Training screenshot Item 102: Data Protection webpage screenshot
	 Item 103: Data Protection glossary of terms Item 104: Subject access rights Learn on Line training screenshot Item 105: Subject access rights guidance note Item 106: Third party data guidance note
	 Item 107: Data subject access request form Item 070: Core Brief on Information security incident reporting procedures Item 071: Information security incident log – template Item 108: Think privacy global email
	 Item 109: Think privacy article (The Works) Item 110: Think privacy poster (image) Item 111: Your privacy (website screenshot)
	 Item 112: Privacy impact assessment guidance Item 113: Privacy impact assessment employee guide Item:114: Privacy impact assessment register (webpage screenshot) Item:115: Privacy impact assessment register extract (webpage screenshot) Item 084: Employee guidance – Accessing records containing personal and sensitive information Item 089: Employee guidance - Disclosing Confidential Information Item 116: Personnel circular – Data loss prevention
	 Item 117: Privacy Audit template – example
Future developments	There will be ongoing development of training and awareness for employees. Preparations are taking place for the implementation of whatever future new Data Protection regulations are introduced alongside the new EU General Data Protection Regulation and the EU Directive on Policing and Criminal Justice Data Protection Directive which will come into force in May 2018.
Assessment and review	Information security incidents are reviewed on a regular basis by the Information Governance Board. Privacy impact assessments are reported annually to the CMT and recorded on a register on the website. Performance on responses to Data Protection subject access requests, FOI requests and EI(S)Rs are reported quarterly to the Corporate Management Team and to the Office of the Scottish Information Commissioner.
Responsible Officer(s)	Information Compliance Manager

Element 10: Business continuity and vital records

Poquiromont	It is recommended that a Rusiness Continuity and Vital Records Plan is in place
Requirement	It is recommended that a Business Continuity and Vital Records Plan is in place in order to ensure that key records and systems are protected and made available as soon as possible in the event of, and following, an emergency. The plan should identify the measures in place to prepare for, respond to and recover from such an emergency.
Statement of compliance	South Lanarkshire Council has a Council wide corporate continuity plan which covers all service areas and will ensure that the Council can continue to function in times of emergency. As part of this process a register of vital records was compiled for each service area. This involved departments examining their records and identifying which of those records would be defined as vital. This exercise was carried out in 2010. During 2013–2015 an Information Audit was carried out and as part of this exercise services were requested to review their vital records. It has now been incorporated into the annual work plan of the Information Governance Board that the vital records registers are reviewed annually. IT Network Back Up Procedure As mentioned in Element 6, the Council also has a contract in place with ATOS to manage the back-up procedures for the entire network. The back-up is carried out to disk. There are servers in two separate locations and mutual back ups are carried out between these locations. A weekly back up is carried out each night in between. There is a 3 month retention period applied. The IT Business Team also has emergency contingency plans in place for the critical IT systems operated by South Lanarkshire Council.
Evidence of compliance	 Primary evidence to be submitted in support of Element 10 includes: Item 118 : Council corporate contingency plan Item 119 : Example vital records schedule – Committee Support Item 120 : Example vital records schedules – Corporate Personnel Item 121 : Disaster plan for the Records Centre Item 122 Vital records guidance note Item 026: Completed information audit template example – Anti Social Behaviour Item 123: Summary of IT Services business critical applications Item 124: IT Services business continuity plan Item 125: EDRM business continuity plan
Future developments	The Council will to continue to develop its business continuity plan on an ongoing basis. Services are required to review their vital records annually and the arrangements in place to safeguard these records on a regular basis.
Assessment and review	Business Continuity arrangements for all departments will are reviewed on a regular basis. The responsibility for this will be by the Resource Executive Directors. IT Services has responsibility for reviewing arrangements for IT systems business continuity. Vital records schedules and arrangements will be reviewed annually

	Responsibility for monitoring this will be held by the Information Governance Board.
Responsible	Administrative Adviser
Officer(s)	Contingency Planning Officer

Element 11: Audit trail

Requirement	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 records management system to provide evidence that the authority maintains a complete and accurate representation of all changes that occur in relation to a particular record.
Statement of compliance	A large proportion of South Lanarkshire Council's records are held in a shared network drive and in online business systems. These records are protected by access controls and security to ensure that only those employees with a business need can access the records.
	However, the Council recognises that some of these electronic records can be moved, edited, renamed and deleted without an auditable trail.
	In terms of manual paper records there are special arrangements in place within Resources to track the movement of these files.
	For example, the movements of legal title deed files are tracked by a paper index system and there are similar local systems in place to track manual file movements in various locations so that services will always be aware of the physical location of files. Examples of these include file signing in and signing out procedures.
	Within the Council's off site records storage centre there is an audit trail for the movement of files to and fro. All files are consigned to the Records Centre through a well established consignment procedure which is recorded on a system. File requests are recorded via a record request procedure.
	Special arrangements are in place for the requesting of Social Work files. There is an approved list of authorised personnel who are given permission to request a file and files are only released to authorised personnel upon signature of a release form.
	Records within the EDRMS have an audit trail of when the item was last accessed, amended and by which employee. The version history of documents showing who last amended them is viewable by all users in EDRMS. Audit reports can be generated by IT which show who last accessed a document.
	South Lanarkshire Council will continue to improve the management of its electronic records by encouraging use of its suite of guidance covering document naming, use of version control, email management and structuring your shared drive.
Evidence of	Evidence to be submitted in support of Element 11 includes:
compliance	 Item 126: Social Work procedure – central filing Item 127: Social Work authorised signatories for file requests from Records Centre
	 Item 128: Social Work file request – signed receipt Item 129: Email re Legal Services sign/out procedure
	 Item 129: Email re Legal Services sign/out procedure Item 130: RM02 consignment to Records Centre forms
	 Item 131: RM03 file request forms Records Centre
	 Item 132: Example finding aid – Licensing and Registration Services
	Item 133: Example finding aid – Money Matters Service
	Item 134: Example of EDRMS audit trail (screenshot)
	Item 135: Example of EDRMS audit trail (screenshot)

	 Item 136 EDRMS audit trail report Item 066: Information security policy Item 137: Transfer of paperwork between offices log – Licensing and Registration Item 138: Internal audit – file removal log
Future developments	Where new systems are being introduced the importance of having an auditable trail is being recognised. Privacy impact assessments are carried out for new systems involving the recording of personal data. This process identifies the need for auditable trails being included in the business specification of these new systems and as a result the Council is moving towards having auditable record trails for its electronic records.
Assessment and review	
Responsible officer(s)	Administration Adviser

Requirement	Core competencies and key knowledge and skills required by staff with responsibilities for records management should be clearly defined and made available within organisations so as to ensure that staff understand their roles and responsibilities, can offer expert advice and guidance, and can remain proactive in their management of recordkeeping issues and procedures. With core competencies defined, the organisation can identify training needs, assess and monitor performance, and use them as a basis from which to build future job descriptions.
Statement of compliance	South Lanarkshire Council has agreed job profiles for the Archives and Information Management Team. These profiles include core competencies, job specific competencies and key knowledge and skills required by staff with responsibilities for records and information management. These roles have been clearly defined within the Archives and Information Management Competency Framework, ensuring that staff understand their roles and responsibilities and can offer expert advice and guidance. This framework has identified that there should be a level of post graduate level qualification in information / records management maintained within the team. The Administration Adviser and Records Officer are members of the Archive and Records Association and attend regular Archivists of Scottish Local Authorities Working Group (ASLAWG) meetings and events hosted by the National Records of Scotland. South Lanarkshire Council is a corporate member of the Information and Records Management Society which also enables access to Scottish Group meetings and events. There is also a programme of ongoing continued professional development.
	In areas of business where EDRMS has been rolled out, key members of staff have been given records management responsibilities for the development and management of the file plan and ongoing records management activities. Also, each Resource has nominated officers with records management
	responsibilities to deal with records management on an operational basis. Specific jobs which involve processing personal and sensitive data have been identified and training on Data Protection will automatically be given to employees recruited to these posts. Council Resources are also required to review the need for Data Protection training on an annual basis.
Evidence of compliance	 Evidence to be submitted in support of Element 12 includes: Item 006: Administration Adviser job specification Item 139: Records Officer job specification Item 140: Archives and Records Management Assistant job specification Item 141: Job matrix Archives and Information Management Team Item 142: List of Learn On Line information management courses (screenshot) Item 143: Letter from Executive Director confirming commitment to ongoing employee development Item 144: Letters to University of Glasgow confirming support for employee undergoing courses (TC) Item 145: Letters to University of Glasgow confirming support for employees undergoing courses(LC) Item 146: Training record screenshot (PB)

Future developments	There will be continued employee development support to the Archives and Information Management Team.
Assessment and review	
Responsible officer(s)	Administrative Adviser

Requirement	Records Management practices in place within an organisation must remain fit for purpose. Procedures should be closely monitored, assessed and reviewed with a view to ensuring ongoing compliance and commitment to best practice recordkeeping. The Keeper expects the Records Management Plan to have in place mechanisms for regularly reviewing the contents of the Plan to ensure processes are operating successfully and identifying processes which require modification.
Statement of compliance	Each of the policies and procedures produced in line with the requirements of the Public Records (Scotland) Act 2011 have been done so in consultation with colleagues across the organisation. This has been coordinated through the Information Governance Board. Once agreed by the Board and consultation with Trade Unions there is a formal approval process through the Corporate Management Team and the Council's Executive Committee.
	The Information Governance Board submits regular update reports to the Corporate Management Team along with the updated action plan. The information strategy provides the framework for all information management activity and its accompanying improvement plan provides the evidence of actions completed and achievements made.
	The Council's Internal Audit Team also incorporate regular information governance internal audit investigations into their annual audit programme. They will also independently review the information strategy improvement action plan by taking a sample of the actions when they are completed to provide an independent assurance that they are completed as intended.
	Information Governance is included on the Council Plan, Connect 2012 - 2017. Measures to record performance in this area are recorded on IMPROVe (the Council's performance measurement system). The performance measures are updated on a quarterly basis with progress statements. These measures are subject to scrutiny by the Executive Directors and Chief Executive.
	The Council also produces an annual governance report which includes a section on information governance. In this report, the Head of Administration and Legal Services provides assurances that the Council is meeting its information governance obligations.
	This Records Management Plan will remain a key document under the control of the Information Governance Board. This will include an annual review process which will be managed by the Information Governance Board.
Evidence of compliance	 Evidence to be submitted in support of Element 13 includes: Item 010: Information strategy Item 147: Information strategy improvement action plan progress as at 16 May 2016 Item 005 Executive Committee report 8 October 2014 IGB update Item 016: Policies and procedures review schedule Item 148: Executive Committee report of 13 April 2016 - Internal Audit Plan 2016/17 Item 149: IMPROVe update on Information Governance (screenshot) Item 150: Risk and Audit Scrutiny Forum report of 31 May 2016 - Annual Governance Statement for 2015/16

Future developments	The information strategy will be reviewed in 2017 and will continue to provide the framework on which the Council bases its information management activities.
Assessment and review	All policies and procedures will be reviewed as per the agreed review programme. These will be put through the formal approval process. This records management plan will be monitored and reviewed by the Information Governance Board on an annual basis.
Responsible officer(s)	Administrative Adviser

Element 14: Shared information

Requirement	Procedures for the efficient sharing of information both within an organisation and with external partners are essential for ensuring 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	South Lanarkshire Council operates in accordance with the Lanarkshire Information Sharing Protocol. This is a procedural guidance document developed by South Lanarkshire's Education, Social Work and Housing and Technical Resources, North Lanarkshire Council, NHS Lanarkshire, Police Scotland and the Children's Reporter. The protocol has been developed mainly to ensure that the services children receive are of good quality, effective and meet their individual needs. The guidelines cover all types of sharing including electronically, verbally or in writing.
	South Lanarkshire Council has also developed a register of data sharing and transfers which is monitored by the Information Governance Board. This register lists all the occasions whereby the Council transfers or shares data with other departments or bodies. It includes both electronic and paper data.
	The Council has also developed a Data sharing policy which is an over arching policy on which Resources will base their local procedures for data sharing. The Council's data sharing procedures are based upon the Information Commissioner's Data Sharing Code of Practice and the Data Protection Act.
Evidence of compliance	 Evidence to be submitted in support of Element 14 includes: Item 098: Data sharing policy Item 151: Executive Committee report of 8 June 2016 – Data sharing policy Item 152: Website screenshot – Data sharing policy Item 153: Lanarkshire Sharing Partners – Good practice guidance Item 154: Register of data sharing and transfers Item 155: A Guide to Sharing information for Adults Item 156: Data Sharing Learn On Line Course Item 157: Quick guide information sharing decision process Item 158: Intranet screenshot – Information sharing Item 159: Website screenshot – Information sharing
Future developments	The Council approved the Data sharing policy in June 2016. A suite of guidance and local procedures will be developed to provide employees with further guidance.
Assessment and review	
Responsible officer(s)	Administrative Adviser

Additional element: Records created as a result of a service being contracted out

Requirement	South Lanarkshire Council is aware that when contracting out a function to a private or voluntary organisation, the Council will be responsible for ensuring that the records created as part of that contract are managed in an appropriate manner.
Statement of compliance	The Council has developed a clause as part of its Standard terms and conditions of contract document. The relevant clause is outlined below.
	A14 Records Management
	A14.1 The Contractor shall throughout the Contract Period assist the Council in complying with its obligations in respect of records management when required by the Council (acting reasonably) at no cost to the Council.
	A14.2 The Contractor shall ensure that Records are retained in compliance with:-
	 (a) the Council's records management policy or any other records management policy agreed between the Parties; and/or (b) the agreed Retention Schedule throughout the Contract Period for the appropriate Retention Period,
	A14.3 At the expiry or termination of the Contract the Contractor shall, at no cost to the Council, ensure that any Records that are still within their Retention Period are returned to the Council or are destroyed at the Council's discretion.
	A14.4 The Contractor's compliance with the provisions of this Clause A14 shall be monitored in terms of Clause C9.
Evidence of compliance	Evidence to be submitted in support of this Element includes:
compliance	Item 160 : Standard terms and condition of contract - services
Future developments	The Council is currently reviewing how it is implementing the new rules under the Public Contracts (Scotland) Regulations 2015 and the Procurement (Scotland) Regulations 2016.
	We intend to identify within the procurement process where we can ask bidders for information on their records management practices and procedures.
	As records management requirements will be specific to contracts, it is intended that there will be a suite of questions prepared for inclusion in the technical envelope. These questions will be weighted according to the relevance and importance of records management to the contract and evaluated against a standard scoring guide.
	Appropriate wording will be added into the sourcing methodology to enable identification of any contracts which will involve the creation of records and ensure that the appropriate records management questions are included in the technical envelope.

Assessment and review	The procurement process is monitored by the Procurement Officer's Network Group within the Council. Each contract is monitored by the Resource who has awarded the contract.
Responsible officer(s)	Administrative Adviser

Annex A:

Evidence to be submitted

Please find a list of evidence to be submitted in support of each of the elements of the records management plan below. This evidence will be submitted separate to this records management plan, in electronic and paper format.

Evidence item ref no:	Details:	Date:	In support of element(s):
			-
001	Statement of responsibility/cover letter		1, 2
002	Records management policy		1, 3
003	Letter from SLLC Company Secretary		1, 7
004	Letter from the Clerk to South Lanarkshire Licensing Board		1
005	Executive Committee report 8 October 2014 IGB update approving responsibility.		2, 13
006	Administration Adviser job specification		2, 12
007	Executive Committee report dated 11 May 2016 seeking approval of Records management policy		3
008	Management Bulletin Records management policy		3
009	Personnel Circular Records management policy		3
010	Information strategy		3, 13
011	Information strategy improvement plan		3
012	Executive Committee report dated 8 October 2014 seeking approval of Information Strategy		3
013	Management Bulletin Information strategy		3
014	Personnel Circular Information strategy		3
015	Core Brief Information strategy and information security policy		3, 8
016	Policies and procedures review schedule		3, 13
017	Intranet screenshot – Information governance		3
018	Website screenshot – Information governance		3
019	Intranet screenshot – Information management policies		3
020	Information strategy – South Lanarkshire Leisure and Culture		3
021	Master retention schedule spreadsheet		4, 5
022	EDRMS file plan extract		4
023	EDRMS update report to Corporate Management Team 19 November 2015		4
024	Information Management Senior Management Team Report (Community and Enterprise Resources) 12 February 2016		4
025	EDRMS user guide		4
026	Information Audit Example – Anti Social Behaviour Services		4, 10
027	Information Audit Example – Finance Services		4
028	Email to Managers re implementation of information audit		4
029	Amenity Services – Information audit progress		4
030	Environmental Services – Information audit progress		4
031	Planning and Building Standards Services – Information audit progress		4
032	Structuring your shared drive – guidance		4
033	Naming conventions – guidance		4
034	Version control – guidance		4
035	Email management - guidance		4

036	Records management good practice guides – intranet screenshot	4
037	Retention and disposal procedural guide	5
038	Retention and disposal policy	5, 6, 7
039	Retention and disposal policy Executive Committee Report 23 September 2015	5
040	Retention schedule sample Environmental Services	5
041	Retention schedule sample South Lanarkshire Leisure and Culture HQ	5
042	Retention schedule sample Legal Services (includes Licensing Board)	5
043	EDRMS example of disposal schedule	5, 6
044	Housing and Technical Resources retention scheduling action plan	5
045	Example vital records schedule	5
046	Confidential waste disposal guidelines	6
047	Certificate of destruction - example	6
048	Confidential waste agreement with contractor	6
049	Note of site visit to waste contractor	6
050	Personnel circular re confidential waste	6
051	Extract from destruction register	6
052	Server contract – ATOS (Bull Information Systems)	6
053	Desktop contract – Computacenter	6
054	Collection, transfer and archiving policy	7
055	Collection, transfer and archiving policy Executive Committee report 23 September 2015	7
056	Personnel Circular Retention and disposal policy and collection, Transfer and archiving policy	7
057	Example catalogue F29 Keith and Patrick	7
058	Collections summary	7
059	Terms and conditions of deposit	7
060	Accession register	7
061	Example accession: Strathclyde Building Preservation Trust	7
062	Extract from Information Governance Board minutes – discussion of Digital Preservation	7
063	Collection, transfer and archiving policy – South Lanarkshire Leisure and Culture	7
064	Retention and disposal policy - South Lanarkshire Leisure and Culture	7
065	Management Bulletin Retention and disposal policy and Collection, transfer and archiving policy – South Lanarkshire Leisure and Culture	7
066	Information security policy	8, 11
067	Executive Committee report dated 8 October 2014	8
068	seeking approval of Information security policy	
	Personnel Circular on Information security policy	8
069	Management Bulletin on Information security policy	8
070	Core Brief on Information security incident reporting procedure	8,9
071	Information security incident log – template	8,9
072	IT security incident escalation process	8
073	IT acceptable use policy	8

074	IT acceptable use policy employee guide	8
014		ŏ
075	Core Brief on IT acceptable use policy	8
076	Core Brief on laptop security	8
077	Risk and Audit Scrutiny Forum report risk management update 19 January 2016	8
078	Information security : Learn On Line online training course –screenshot	8
079		8
080	EDRMS access controls example EDRMS access group example 01	8
081		8
082	EDRMS access group example 02	8
002	Confidentiality of information – memo to Personnel Services employees	0
083	Employee communications plan	8
084	Employee guidance – Accessing records containing personal and sensitive information	8, 9
085	Core Brief on Accessing records containing personal and sensitive information	8
086	Employee guidance – Information security while out of the office	8
087	Personal Circular on Information security while out of the office	8
088	Employee guidance - Emailing and general correspondence containing personal, sensitive personal and confidential information	8
089	Employee guidance - Disclosing confidential information	8,9
090	Personnel Circular on Disclosing confidential information	8
091	External supplier access form	8
092	Third party network code of connection	8
093	Internal Briefing Paper – Data loss prevention – USB ports	8
094	Information security policy – South Lanarkshire Leisure and Culture	8
095	Management Bulletin – Information security policy South Lanarkshire Leisure and Culture	8
096	Privacy Policy	9
097	Information requests compliance policy	9
098	Data sharing policy	9, 14
099	An Introduction to the Data Protection Act Learn on Line training screenshot	9
100	How Data Protection works Learn on Line training screenshot	9
101	Data sharing Learn on Line Training screenshot	9
102	Data Protection webpage screenshot	9
103	Data Protection glossary of terms	9
104	Subject access rights Learn on Line training screenshot	9
105	Subject access rights guidance note	9
106	Third party data guidance note	9

107	Data subject access request form	9
108	Think privacy global email	9
109	Think privacy article (The Works)	9
110	Think privacy poster (image)	9
111	Your privacy (website screenshot)	9
112	Privacy impact assessment guidance	9
113	Privacy impact assessment employee guide	9
114	Privacy impact assessment register (webpage screenshot)	9
115	Privacy impact assessment register extract (webpage screenshot)	9
116	Personnel circular – Data loss prevention	9
117	Privacy Audit template – example	9
118	Council corporate contingency plan	10
119	Example vital records schedule – Committee Support	10
120	Example vital records schedules – Corporate	10
120	Personnel	10
121	Disaster plan for the Records Centre	10
122	Vital records guidance note	10
122	Summary of IT Services business critical applications	10
123		10
	IT Services business continuity plan	
125	EDRM business continuity plan	10
126	Social Work procedure – central filing	11
127	Social Work authorised signatories for file requests from Records Centre	11
128	Social Work file request – signed receipt	11
129	Email re Legal Services sign/out procedure	11
130	RM02 consignment to Records Centre forms	11
131	RM03 file request forms Records Centre	11
132	Example finding aid – Licensing and Registration Services	11
133	Example finding aid – Money Matters Service	11
134	Example of EDRMS audit trail (screenshot)	11
135	Example of EDRMS audit trail (screenshot)	11
136	EDRMS audit trail report	11
137	Transfer of paperwork between offices log – Licensing and Registration	11
138	Internal audit – file removal log	11
139	Records Officer job specification	12
140	Archives and Records Management Assistant job specification	12
141	Job matrix Archives and Information Management Team	12
142	List of Learn On Line information management courses (screenshot)	12
143	Letter from Executive Director confirming commitment to ongoing employee development	12
144	Letters to University of Glasgow confirming support for employee undergoing courses (TC)	12
145	Letters to University of Glasgow confirming support for employees undergoing courses(LC)	12
	employees undergoing coursesu u	

147	Information strategy improvement action plan progress as at 16 May 2016	13
148	Executive Committee report of 13 April 2016 - Internal Audit Plan 2016/17	13
149	IMPROVe update on Information Governance (screenshot)	13
150	Risk and Audit Scrutiny Forum report of 31 May 2016 – Annual Governance Statement for 2015/16	13
151	Executive Committee report of 8 June 2016 – Data sharing policy	14
152	Website screenshot – Data sharing policy	14
153	Lanarkshire Sharing Partners – Good practice guidance	14
154	Register of data sharing and transfers	14
155	A Guide to Sharing information for Adults	14
156	Data Sharing Learn On Line Course	14
157	Quick guide information sharing decision process	14
158	Intranet screenshot – Information sharing	14
159	Website screenshot – Information sharing	14
160	Standard terms and conditions of contract	Additional element