

DRIVING FORWARD PROFESSIONAL  
STANDARDS FOR TEACHERS



The General Teaching Council for Scotland  
Records Management Plan 2017



## 1 Introduction

Under the Public Records (Scotland) Act 2011 (“PRSA”) GTCS must produce and submit a records management plan setting out proper arrangements for the management of its records to the Keeper of the Records of Scotland for agreement. This Plan will show effective, efficient and systemic control of the creation, storage, retrieval, maintenance, use and disposal of our records which helps us to:

- 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.

The scope of the Plan applies to all records we create; irrespective of how they are created, stored or the type of information they contain.

The Plan is organised in sections to fit with the 14 elements identified by the Registers of Scotland in its Model Records Management Plan.

The Plan also provides information to cover situations where contractors carry out GTCS functions (or provide services to us).

## 2 Element 1: Senior Management Responsibility

*Identify an individual at senior level who has overall strategic responsibility for records management.*

The Senior Manager within GTCS with overall strategic responsibility for records management is:

Kenneth Muir  
Chief Executive  
General Teaching Council for Scotland  
Clerwood House  
96 Clermiston Road  
Edinburgh EH12 6UT

Tel: 0131 314 6000

The Chief Executive fully endorses this Plan and the GTCS Records Management Policy and will ensure the required improvements to records management procedures are implemented corporately and monitored by the Records Manager through the assessment and review process.

Evidence:

Appendix 1 – Cover letter from the Chief Executive of GTCS  
Appendix 2 – GTCS Records Management Policy

### **3 Element 2: Records Manager Responsibility**

*Identify an individual, answerable to Senior Management, to have day-to-day operational responsibility for records management.*

The individual answerable to Senior Management within GTCS, who has operational responsibility for records management currently is:

Jennifer Macdonald  
Director of Regulation and Legal Services  
General Teaching Council for Scotland  
Clerwood House  
96 Clermiston Road  
Edinburgh EH12 6UT

Tel: 0131 314 6000  
E-mail: Jennifer.macdonald@gtcs.org.uk

We plan to appoint a Compliance Officer within the next 12 months (who will report to the Director of Regulation and Legal Services) in view of the volume of work that we have identified is required in the context of records management and our commitment to meeting a best practice standard. This role will assume day-to-day operational responsibility for records management alongside a broader compliance remit.

Evidence:

Appendix 1 – Cover letter from Chief Executive of GTCS with extract job description

### **4 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 stateholders that managing records is important to the authority and serves as a mandate for the activities of the records manager.*

The GTCS Records Management Policy is available on both the GTCS website and intranet (which is developed on the SharePoint platform and is commonly referred to as "The Hub" within GTCS). This document, together with the Records Management and Retention Schedule that supports it, is the GTCS records management policy statement.

The Policy was updated (and the Records Management and Retention Schedule was created, replacing our previous version from 2011 which followed a much simpler (and far less comprehensive) format) to reflect the requirements of the PRSA and was approved by the GTCS Corporate Management Team on 19 July 2017.

Evidence:

Appendix 2 – GTCS Records Management Policy  
Appendix 3 – Extract of Note of Meeting of Corporate Management Team of 19 July 2017

## 5 Element 4: Business Classification

*A business classification scheme describes what business activities the authority undertakes – whether alone or in partnership.*

GTCS is a comparatively small organisation (with 57 full time equivalent members of staff). GTCS is established by statute (the Public Services Reform (General Teaching Council for Scotland) Order 2011) and has a focused range of statutory and business functions.

In order to meet the PRSA requirements, we have developed a Records Management and Retention Schedule which incorporates our business classification scheme (by listing our business and statutory functions and the various associated business activities). The Records Management and Retention Schedule also sets out:

- the departments that are currently responsible for delivering the various functions
- the information (or record) item
- the format in which the information (or record) item is held
- where the information (or record) item is held
- the record owner and manager (a Director)
- whether the information (or record) item is business critical (vital)
- retention period
- permanent archival and destruction arrangements

The Records Management and Retention Schedule was developed following a comprehensive data audit process. This process took a significant amount of time and the Schedule is still in the process of being finalised for use. We intend to roll the Records Management and Retention Schedule out across the organisation at the same time as we upgrade our SharePoint system (the principle document storage and management system that we use). We intend to contract a specialist Information Architect to help us structure our new document storage and management system in order to address the issues (particularly as regards the duplication of records) that the data audit identified. Guidance and comprehensive training will support the roll out process.

Once our Records Management and Retention Schedule is rolled out, the identified record owner (a member of the Corporate Management Team) will be required to confirm in writing to the Chief Executive every 6 months that his/her department's records are being managed in accordance with the Records Management Policy.

Our contractors will be required to manage any of our records that they hold in accordance with the GTCS Records Management Policy and the Records Management and Retention Schedule. We will update our standard terms and conditions for our suppliers to reflect this.

The Records Management and Retention Schedule replaces the far simpler Records Retention Schedule that was previously in place (and was introduced in 2011). We have provided this earlier version as part of the evidence submitted for background information.

Evidence:

Appendix 3 – Extract of Note of Meeting of Corporate Management Team on 19 July 2017  
Appendix 4 – Records Management and Retention Schedule

## 6 Element 5: Retention Schedules

*A retention schedule is a list of records for which pre-determined destruction dates have been established.*

The GTCS Records Management and Retention Schedule was approved by the GTCS Corporate Management Team on 19 July 2017. The Schedule is available on the GTCS intranet (the Hub).

As explained above, the Schedule is new and is still to be rolled out so we expect it to be subject to refinement and amendment on an ongoing basis. Change requests will be identified and will only be accepted through the Records Management Working Group. Any changes will be subject to the Corporate Management Team approval process. The Schedule is maintained by the Records Manager.

We plan to do significant work over the next 12 months to ensure that the retention rules specified are consistently applied across GTCS record systems. The key issue that our data audit has identified is that records are not always being disposed of; we have not identified an issue with records being disposed of prematurely.

Evidence:

Appendix 3 – Extract of Note of Meeting of Corporate Management Team on 19 July 2017

Appendix 4 – Records Management and Retention Schedule

## 7 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.*

Destruction of records occurs at the end of the retention period set out in the Records Management and Retention Schedule. For the purpose of the Records Management Plan, destruction means the physical destruction of paper (or other physical form) records or the electronic deletion of electronic records.

As set out in the Records Management and Retention Schedule, a significant majority of our records are now held in electronic form and we envisage that all of our records will be held electronically within the next three years. Where information is received in hard copy, increasingly a PDF scanned document is created and saved into the relevant electronic records repository instead of retaining the paper version.

The destruction of physical GTCS data is undertaken by an external company (Shredall Ltd). This company provides secure, on-site shredding and disposal of all physical records (largely paper but occasionally discs or tapes). The service is provided every two weeks and is supervised by a GTCS staff member. A certificate of destruction is obtained. The company is subject to our standard supplier terms and conditions and has provided GTCS record destruction services for over ten years.

The electronic deletion of electronic records is more complex given that we currently have a number of record repositories. The destruction arrangements for these records are described in detail in our Information Security Policy. We are in the process of initiating a project to replace our current teacher register database with a new system that will also

introduce an automated form of case management (covering our fitness to teach investigation and adjudication function). The intention is that this change will mean that our records repository infrastructure is made more coherent and we will achieve better system integration that will lead to more consistent, efficient records management. The aim is also that this new coherent system will better facilitate comprehensive auto-destruction of records, in line with the retention periods identified in the Records Management and Retention Schedule.

As noted throughout this document, we know that we have work to do to roll out our new Records Management and Retention Schedule and ensure that the retention rules specified are applied consistently across the organisation. Allied to this, we know we also have work to do in ensuring that all copies of a record are identified and destroyed because we know that we have issues with certain record types (finance and project records particularly) being held in duplicate in more than one location. We also know that we have issues with records not being destroyed. We intend to address all of these issues over the next 12 months in conjunction with upgrading our systems (as earlier explained).

We also intend to formalise an authorisation process for the destruction of what we have identified as our highest risk (and sensitivity) record: a teacher's register entry and any fitness to teach records. To date, such records have been destroyed only on confirmation of the teacher's death and these have been authorised through our registration team, fitness to teach team as well as IT team. Our new Records Management and Retention Schedule introduces the additional destruction of such records when 50 years have passed since registration was last removed/lapsed. We are of the view that more controlled authorisation procedures need to be in place for the destruction of such records and we will be introducing these alongside the rollout of the new Schedule.

Evidence:

Appendix 4 – Records Management and Retention Schedule

Appendix 6 – Certificate of Destruction examples

Appendix 7 – Information Security Policy

## **8 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.*

The records that we hold that have been identified as having enduring corporate value are detailed on the Records Management and Retention Schedule.

We have historically archived our records of enduring value with The National Archives of Scotland (NAS) and will continue to do so.

We are in the process of agreeing a Memorandum of Understanding with NAS to formally document the timing of our transfers, transfer mechanisms and other terms and conditions. As specified in the Records Management and Retention Schedule, we will transfer records for permanent archiving to NAS after 20 years (this period has been set carefully to align with how long we need on-site access to the records). The archiving process has previously taken place by the physical records being delivered to NAS but we are exploring electronic transfer mechanisms with NAS for future.

There are a small number of records that we have identified as having enduring corporate value (and that therefore require to be archived). The records that we have identified

largely comprise our Council and Committee papers/minutes alongside our Rules and Schemes (which are quasi-legislation or constitutional documents and therefore have continuing legal value). There are also certain professional standards policy documents that we have included as these are of important historic and legal value. All of these records will enable the development of GTC Scotland's policies to be tracked from a historical (and/or research) perspective.

In addition to those records referenced above, we have identified certain research reports/statistical information and other legal documentation that has continuing legal or research value. These records are currently permanently stored electronically within our records repository (the Hub). We know we need to consider the arrangements for the permanent archiving of these records further and will do so when we consult an Information Architect and upgrade the Hub to a newer Sharepoint version. We will also explore with NAS whether these items should be in the records transferred for permanent external archiving (perhaps linked to a web harvesting mechanism which is currently under discussion).

Evidence:

Appendix 4 – Records Management and Retention Schedule

Appendix 8 – Correspondence with The National Archives of Scotland demonstrating that a Memorandum of Understanding is in development

## **9 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.*

GTC Scotland has put in place an information security policy and has recently reviewed and revised it to seek to ensure compliance with this Records Management Plan (ensuring out records are appropriately secured). This policy was approved by the Corporate Management Team on 26 July 2017. We will carry out staff training on the revised policy within the coming months and we expect that it will be reviewed and revised within the next 12 months given upgrades to our IT (server) infrastructure that are taking place and the pace of change in this context generally.

As noted elsewhere in this document, we are planning to move to electronic (paperless) records within the next 3 years. The significant majority of our records are already held in this way. For the small number of paper records that we hold, and taking account of our move to electronic/paperless working and the fact that these records are held in a current or semi-current context (therefore for relatively short time periods), we are not intending to upgrade our physical storage. We have secure cabinets that are used to store such records but we recognise that these do not provide any physical security feature beyond the ability to be locked.

We know that we need to make improvements to our authorisation procedure for the destruction of certain records (as explained in respect of Element 6). We also need to do work to enhance our business continuity arrangements so that the availability of all of our vital records is maintained in the event of a critical incident (see our further comments related to this in respect of Element 10).

We are a comparatively small organisation with a focused range of business functions and activities. Taking account of this, we have not allocated specific security classifications to the records that we hold but this is something that could be developed if required.

Evidence:

Appendix 4 – Records Management and Retention Schedule

Appendix 5 – Extract from the note of the meeting of the Corporate Management Team on 26 July 2017

Appendix 7 – Information Security Policy

## **10 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.*

Under the Data Protection Act 1998 (DPA), GTC Scotland is a data controller and is registered as such with the Information Commissioner's Officer (ICO). GTC Scotland's registration can be found on the ICO's Data Protection Public Register – Registration Number Z5397577.

GTC Scotland is required to hold and process personal information in order to carry out its functions. We have a privacy policy (or fair processing notice) in place that is published on our website. This policy also highlights the right to make a subject access request. As noted above, we also have in place a comprehensive information security policy.

We maintain a register of subject access requests that we receive and process such requests in accordance with the DPA.

As set out in the information security policy, we have a data breach procedure in place to manage any risk arising from such an incident.

Training is provided to staff on the DPA. Alongside work towards complying with the GDPR (see below), we will be looking at putting in place customised online data protection modules that staff can complete annually.

GTC Scotland is currently preparing for the introduction of the General Data Protection Regulation (GDPR) in May 2018 and a number of staff members have attended training events in relation to this. We will be comprehensively reviewing our privacy policy (and subject access request procedures) as well as auditing our information sharing arrangements and reviewing our data breach procedure in a first phase of compliance activity. As noted above, we will also be reviewing how we deliver staff training on data protection and we will be dedicating more staff resource (alongside records management) to support ongoing compliance as we have recognised that the GDPR compliance requirements are more demanding.

Evidence:

Appendix 7 – Information Security Policy

Appendix 9 – GTC Scotland's ICO Data Protection Public Register Extract

Appendix 10 – Privacy Policy

Appendix 11 – Data Protection Staff Training Presentation Exemplars

## 11 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.*

GTC Scotland has a business continuity plan (BCP) in place which is invoked in the event of “critical incidents”. The BCP defines a critical incident as one which has an immediate and significant impact on our business operations and may require urgent action. We are currently in the process of reviewing and revising our BCP to make it more comprehensive, including to cover access to vital records in the event of an emergency affecting our premises or systems. The Records Manager will take a key role in this review process in order to ensure adherence to the requirements of the PRSA.

We have defined our “vital records” as those which are essential to the continuity of our key business functions in the event of a critical incident. We have highlighted our vital records in our Records Management and Retention Schedule.

As noted earlier in this document, we will be taking steps over the next 3 years to ensure that all of our records are stored electronically. Linked to work on the review, development and stress-testing of our BCP, we will be checking that we have identified our vital records accurately and we will be prioritising work to ensure that all of these records are stored electronically. We will then also ensure that all of the records are accessible remotely with appropriate hardware arrangements in place to support such access.

Evidence:

Appendix 1 – cover letter from the Chief Executive of GTCS  
Appendix 4 – Records Management and Retention Schedule  
Appendix 7 – Information Security Policy  
Appendix 12 – Business Continuity Plan

## 12 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.*

As a small organisation based in one office with a contained number of paper records that we are transitioning to wholly electronic (as explained above), we do not have steps to document the editing of our paper records and we do not consider it worthwhile developing these procedures against this context and taking account of the nature of the paper records held. The location of a paper record is tracked within the small teams that use them (who sit close to where the records are stored). Paper records may not be taken out of the office without appropriate management authorisation (as set out in the Information Security Policy) and where records are taken outside the office, a sign-out sheet must be completed. The nature of the paper records held (for example some financial management records, current fitness to teach case files and registration applications under consideration that have not yet become paperless) means that we consider any risk from continuing to operate this way in the short term to be minimal.

In terms of our electronic records, as detailed on the Records Management and Retention Schedule, these are currently held across a number of different systems (or repositories). SharePoint (the Hub), Miller and MyGTCS all have the ability to provide an audit trail on the transactions (or activities or movements) that take place within the record and these functions have been enabled to allow these activities to be tracked for the lifetime of the

record. When we upgrade our systems and document management infrastructure to make it more coherent and fit for purpose, we will ensure that an audit trail is captured as a key system requirement.

We are aware that we need to introduce specific procedures and guidance in relation to version control within GTCS. We plan to do so alongside the upgrading of our Hub (as explained above) and in taking steps to ensure consistent application of our Records Management and Retention Schedule across the organisation.

Evidence:

Appendix 7 – Information Security Policy

Appendix 13 – Screen grab of report (audit) functionality from our Hub (SharePoint)

Appendix 14 – Screen grab of activity log (audit report) from Miller (Register of Teachers Database)

Appendix 15 – Screen grab of activity log (audit report) from MyGTCS (CMS)

### **13 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.*

As noted in respect of Element 2, the CMT is committed to achieving and then maintaining effective records management. We intend to recruit a Compliance Officer over the next 12 months to fulfil the Records Manager role on a permanent basis and target more resource in this important area. We will define a competency framework for this role when we define the role job description and then ensure the professional development of the individual following recruitment.

We have provided training to staff in relation to records management. This has been at a foundation level as part of starting to engender a culture within the organisation where records management is valued and the importance of it understood. We will be providing a significant volume of staff training over the coming year on records management and data protection. In recognition of this, we have taken the step of setting a mandatory objective for staff this year in relation to records management. This requires all staff to:

*Be able to demonstrate your understanding of how the Records Management policy and guidance impacts upon you and your team, and describe the actions you have taken to implement good records management as a result.*

We will also be increasing the work we do more generally to provide training to those non-staff who are involved in our work. This includes our Council members (our non-executive Board) and Panel members (who carry out a range of case (and similar) work alongside staff).

Evidence:

Appendix 1 – cover letter from the Chief Executive of GTCS

Appendix 16 – Records Management Staff Training Presentations and Materials

Appendix 17 – Staff Performance Review and Development Template (with mandatory records management related objective)

## 14 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.*

GTCS will commission an audit of our compliance with this Plan (and our related policies and procedures) annually alongside our financial and other externally audited activities. The first such audit will fall in June 2018.

We will shortly carry out a procurement exercise to appoint our auditors (the auditors that we currently appoint are Scott Moncrieff but their term of appointment will shortly come to an end) and will cover this records management/information governance and management activity within the scope of the work to be tendered. The review methodology will be determined based on the best practice recommendation of the appointed auditors.

The audit results will be reported to the CMT as well as the Records Management Steering Group and the Records Manager will be responsible for reviewing the results to identify and implement any required improvements.

Evidence:

Appendix 1 – cover letter from the Chief Executive of GTCS

Appendix 18 - Extract of Note of Meeting of Corporate Management Team on 10 November 2016

## 15 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.*

GTCS shares information with relevant partner agencies in very limited circumstances, and almost always under legislative provision (for example, the notification of teacher employers of fitness to teach case outcomes). Those concerned are made aware of this activity through our privacy (or fair processing) notice.

As noted in respect of Element 9, we will be reviewing a range of our procedures and practice over the next nine months in order to ensure compliance with the GDPR (work on this compliance project has commenced). Included within this work will be an audit of our information sharing arrangements. We envisage that we will put in place more formal arrangements to ensure that these are all properly documented and that an information sharing agreement register is maintained.

Evidence:

Appendix 1 – cover letter from the Chief Executive of GTCS

Appendix 7 – Information Security Policy

Appendix 9 – GTC Scotland's ICO Data Protection Public Register Extract

Appendix 10 – Privacy Policy

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