



Records Management Policy

POLICY INFORMATION

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APPROVAL AND OWNERSHIP

Department / Functional Ownership	Digital and Transformation
Name of Owner	Head of Corporate Data and Compliance
Approved By	Head of Corporate Data and Compliance

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DOCUMENT HISTORY

Version	Date	Updated by	Reason for change

DISTRIBUTION LIST



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EXECUTIVE SUMMARY

Records management is vital to the delivery of our services in an orderly, efficient, and accountable manner. Effective records management will help ensure that we have the right information at the right time to make the right decisions. It will provide evidence of what we do and why, therefore protecting the interests of Scottish Water, its staff and all who interact with the organisation. Records, and the information they preserve, are an important corporate asset.

In line with ISO 15489-1:2016, this policy applies to the creation, capture and management of records regardless of structure or form, in all types of business and technological environments, over time.

Scottish Water will:

- Identify the records that require to be generated, retained and preserved
- Decide on the retention period for records
- Designate Custodians for all records who are responsible for end to end records management
- Document and maintain a list of required attributes and record type for each record
- Ensure that records are available and retrievable for the duration of the retention period
- Ensure records are only accessible to authorized users
- Decide on disposal or archive of records after completion of the retention period.
- Ensure record data is fully erased and destroyed on disposal
- Ensure a log of destroyed records and media is maintained.

Roles and Responsibilities:

Executive Leadership Team

Board level responsibility for ensuring compliance with this policy lies with the Chief Information Officer. Individual Executive team members have responsibility for ensuring that their departments have local procedures and guidance in place which complies with the records management policy and standards and that records management is carried out in accordance with those procedures.

Business Information Group

This group is responsible for considering and approving changes to this policy and any records management standards. The Information Management Function will report quarterly to this board on records management matters.

Chief Information Officer

The CIO is accountable for ensuring compliance across the organisation.

All Staff

All staff and associates who use and create Scottish Water information are responsible for compliance with this policy and its supporting standards and procedures.



REASON FOR POLICY

Scottish Water has documented this 'Records Management Policy' to communicate its commitment to doing business with the highest ethical standards and appropriate internal controls. The objective of this policy is to ensure the availability of required records as per Scottish Water requirements and as required by applicable laws, regulatory compliance requirements and third party agreements / contracts.

Records are required to be retained for various purposes such as:

- a. Business requirements
- b. For auditability of processes
- c. Statutory requirements
- d. Forensics

Records shall be managed to ensure that they are safe, available and retrievable. Not having this policy may result in any or all of the following:

- a. Unavailability of records when required
- b. Destruction of useful information
- c. Non-compliance to audit and other statutory requirements

SCOPE

This policy is applicable to all records generated and used at Scottish Water. This policy shall be adhered to by all Scottish Water employees, contractors, consultants, partners and agency staff who, with authorization from line management, are provided with appropriate access to the Scottish Water information technology and communications facilities they need to do their job.

DEFINITION OF THE POLICY

Based on the ISO 15489 standard and conforming to ISO 27001 control # A.18.1.3, this policy supports the establishment of strategies, methods, tools, business procedures and processes to ensure that Scottish Water will:

- Comply with all legal requirements, including the Data Protection Act 1998 and Freedom of Information (Scotland) Act 2002
- Securely maintain and preserve access to records in support of the organisation's business needs, including for audit purposes
- Identify, define and manage all types of records, particularly vital records, in an appropriate manner



- Identify opportunities to improve the cost effectiveness of the storage of current and semi-current records
- Incorporate a retention and disposal schedule to ensure records are managed and destroyed once they are no longer required. The schedule will contain a list of generic record types and specific periods of authorised retention
- Consider permanent preservation of files in light of their worth to Scottish Water and the resources available. Records identified as having permanent historical value will be offered to the National Archives of Scotland
- Include electronic and physical records in the system and ensure business critical records are held in a permanently accessible manner.

POLICY DETAILS

1. Management of Records

Scottish Water will manage its records as follows:

- a. Scottish Water shall identify the records that require to be generated, retained and preserved as per applicable statutory requirements, legislation, agreements and contracts
- b. Owners of all business functions and processes in Scottish Water shall identify records that need to be retained and preserved
- c. SW shall decide on the retention period for records
- d. Custodians will be assigned for all records. A Custodian can be designated by 'Role' or be a designated individual person. Custodians shall be responsible for the end-to-end management of records as per this policy
- e. The required attributes of each record and record type shall be documented for all records required to be retained and preserved. A list shall be maintained of all records that are retained and preserved based on this policy
- f. Scottish Water shall ensure that records identified for retention and preservation are available and retrievable for the duration of the retention period. The records shall only be accessible by authorized users
- g. Records shall be disposed after completion of the retention period. The disposal procedure shall ensure that the data on the records is fully erased and destroyed. Custodians of destroyed records shall ensure that a log of destroyed records and media is maintained.



2. Attributes of Records to be Retained

The following attributes of each record shall be documented for all records that required to be retained by Scottish Water:

- a. Name / Title of the record
- b. Name of process that generates the record
- c. Owner of the record
- d. Role / Name of Custodian of the record
- e. Retention period
- f. Archival requirement
- g. Source of the record
- h. Procedure for retrieving the record from its regular location and from archives / Logs
- i. Applicable control
- j. Location of record
- k. Storage Media where the record is stored
- l. Where applicable, document the name and version of software required to create and retrieve the record
- m. Backup requirement of the record
- n. Method of disposal, post retention period
- o. Security Classification of the record, as defined in the Information Asset Management and Classification policy and procedure, to assign the appropriate level of protection from loss, destruction, falsification, unauthorized access and unauthorized release in accordance with legal, regulatory, contractual and business requirements
- p. Category of information or record type (for e.g. Information Security related record, Financial and Accounting records, Compliance record, Transitory record etc). This information can then be used to decide on various aspects including location, backup, and retention period.



3. Disposal of Records

Once it is decided that media containing Records are to be destroyed after the retention period, the disposal shall be achieved as per the **Secure Disposal of Electronic Media Policy**. A record of the records and media destroyed shall be maintained.

4. Transfer of Records

Any records that have passed their review date and are authorised for destruction will then be considered for transfer to The National Registers of Scotland (NRS) for preservation. A listing will be produced for physical and electronic records and passed to NRS.

Physical records will be kept in the SW Record Store and made available for NRS staff to peruse and to make a final determination on their transferral or destruction.

Electronic records will be made available to NRS staff in a similar fashion.

A record of the records and media transferred shall be maintained.

EXCEPTIONS

There are no exceptions to this policy

VIOLATIONS

Failure to comply with this Policy may result in Scottish Water failing to meet regulatory and legislative requirements, suffering financial penalties and reputational damage.

Disciplinary action may be taken against any individual who fails to comply with this policy. This may include the withdrawal of permission to use SW's information technology and communications facilities for personal purposes or, in serious cases, summary dismissal. In the case of contractors, consultants and agency staff SW may terminate their contract.

DEFINITIONS

a. Record

Information created, received, and maintained as evidence and information by an organization or person, in pursuance of legal obligations or in the transaction of business

b. Records management

Field of management responsible for the efficient and systematic control of the creation, receipt, maintenance, use and disposition of records, including processes for capturing and maintaining evidence of and information about business activities and transactions in the form of records



RELATED DOCUMENTS

- a. SW Information Security Policy
- a. SW Information Asset Management and Classification Policy
- b. SW Information Asset Management and Classification Procedure
- c. Secure Management of Electronic Media Policy