

# Records Management Plan

Aberdeen City Council & Aberdeen City Licensing Board

April 2016



ABERDEEN  
CITY COUNCIL



## Foreword

We're really pleased to present the combined Records Management Plan for Aberdeen City Council and Aberdeen City Licensing Board, submitted to the Keeper of the Records of Scotland on 29 April 2016, in accordance with the requirements of the Public Records (Scotland) Act 2011.

Our Records Management Plan is corporate programme of work framed around our corporate Information Management Strategy. Our Information Management Strategy embraces a holistic, developmental approach which recognises information management as a corporate function, setting out the adoption of an integrated approach to managing information which encompasses governance, compliance, lifecycle, risk, sharing and culture.

We fully endorse the detail contained in our Records Management Plan, and confirm that we have overall lead responsibility for progressing and developing the appropriate governance and assurance mechanisms for this work, in our roles as Senior Information Risk Officer, and Clerk to the Licensing Board.



Simon Haston

**Head of Service for IT &  
Transformation and Senior  
Information Risk Officer**



Fraser Bell

**Head of Service for Legal &  
Democratic and Clerk to Aberdeen  
City Licensing Board**



# Records Management Plan Elements

1. Senior Management Responsibility
2. Records Manager Responsibility
3. Records Management Policy
4. Business Classification Scheme
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6. Destruction Arrangements
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# 1. Senior Management Responsibility

For Aberdeen City Council, senior management responsibility for the Records Management Plan is held by the Council's Senior Information Risk Officer, a role undertaken by the Council's Head of Service for IT & Transformation, Simon Haston, who is one of the Council's Chief Officers. Please refer to the foreword from the Council's Senior Information Risk Officer, formally endorsing this plan and its on-going management. Please refer to the attached CMT report ([Appendix 1](#)) and associated minute ([Appendix 2](#)), demonstrating the Council's Corporate Management Team's understanding of the role of the Senior Information Risk Officer in relation to the Council's Records Management Plan.

For Aberdeen City Licensing Board, senior management responsibility for the Records Management Plan is held by the Clerk to the Licensing Board, a role undertaken by the Council's Head of Legal & Democratic Services. Please refer to foreword from the Clerk to the Licensing Board formally endorsing this plan and its ongoing management, and to the [report and associated minute of the Licensing Board](#) approving the Licensing Board's adoption of this joint plan.

Our joint plan reflects the common staffing, administrative and governance arrangements in place across the Council and Licensing Board in respect of our managing information and records, and reflects our shared commitment to continuous improvement in this area. All references to the Council in this plan should be taken to refer to the Council and the Licensing Board.

The Council is implementing a corporate programme of work, in accordance with its revised Corporate Information Management Strategy ([Appendix 3](#)), which was approved by the Council's [Finance, Policy & Resources Committee on 30 September 2014](#). This work will be led and governed by the Senior Information Risk Officer and key information management domain specialists, in collaboration with Information Asset Owners. The Information Management Strategy and associated Improvement Programme framework sets out a commitment to implement a holistic, developmental approach in which the Council will coordinate more efficient ways of maximising the benefits from its information assets, by managing them more effectively, re-using and utilising where viable, sharing where possible and at the same time protecting accordingly. This framework will ensure a cohesive programme of continuous improvement which supports the future planning, and implementation of corporate information management systems and practice which meet all business, legislative and statutory requirements.

This Information Management Strategy and Improvement Programme is a comprehensive, long term plan that ensures the Council continues to develop a fit-for-purpose framework for the appropriate governance of all information assets that will provide business efficiencies, whilst ensuring business continuity and risk management. In the longer term, it will provide the Council with an internal infrastructure for managing all information assets that is consistent and flexible to meet the variety and complexity of customer and stakeholder service delivery required by the Council now, and in the future, as detailed in our 5 year Corporate Business plan. Each domain area within the Information Management Strategy will align to the governance and reporting structure led by the Senior Information Risk Owner.

## 2. Records Manager Responsibility

The Council has in place a specialist team who lead on information and records management. This team currently comprises:

- Information Manager ([Appendix 4](#))
- Senior Information Compliance Officer ([Appendix 5](#))
- Information Management Officer ([Appendix 6](#))
- Information Management Advisers (3) ([Appendix 7](#))
- Information Compliance Assistants (2) ([Appendix 8](#))

This team is led by Caroline Anderson, Information Manager, who has responsibility for leading the development, implementation and monitoring of corporate information and records management strategies, policies and procedures across the organisation.

All the team's current job role tasks are focussed on Information and Records Management activities.

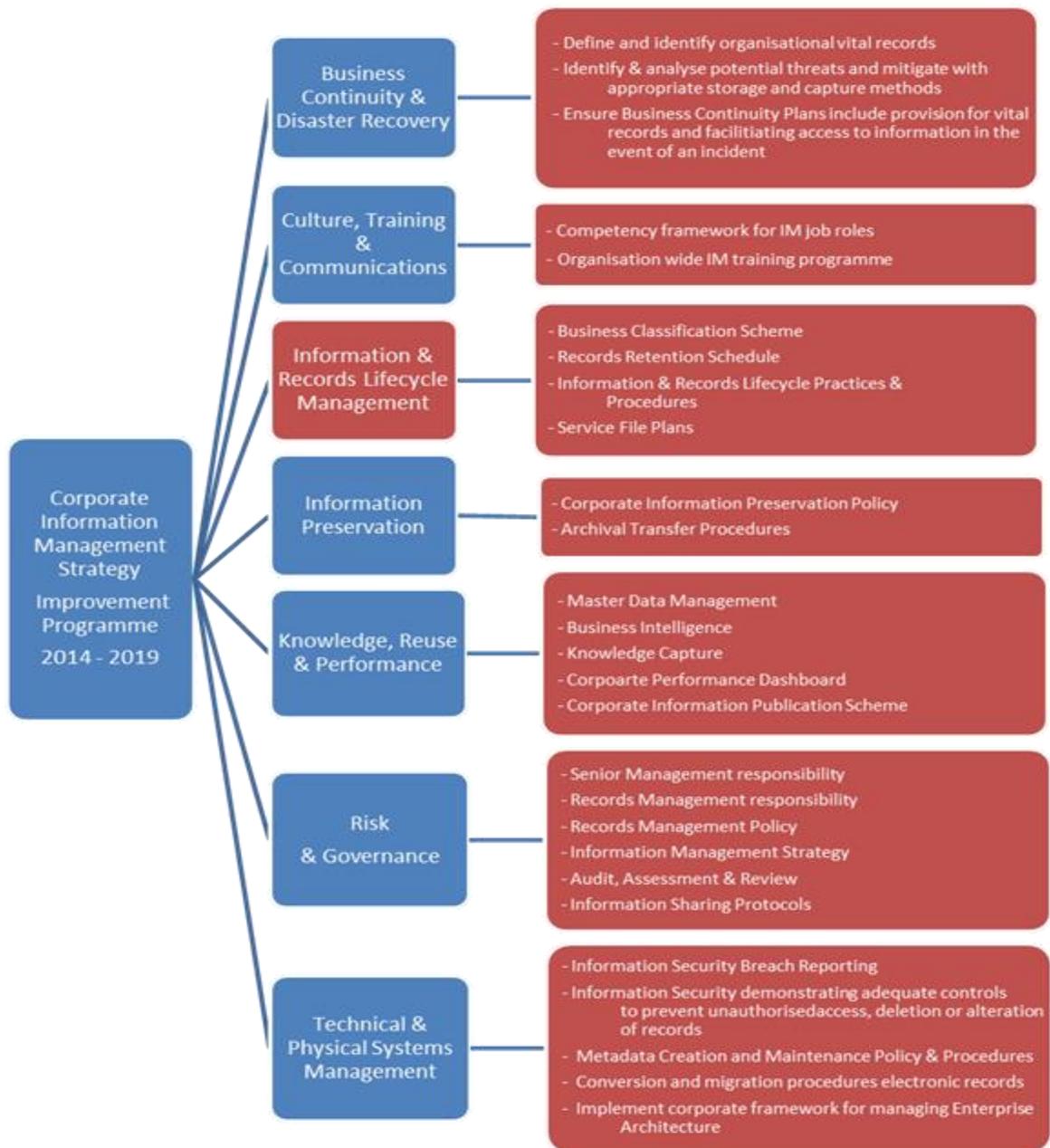
### 3. Records Management Policy

The Council's strategic Information Management objectives, and the improvement programme required to make them a reality, are set out in the Corporate Information Management Strategy. The Information Management Strategy identifies 7 key domains where maturity is crucial to delivery on the strategic objectives:

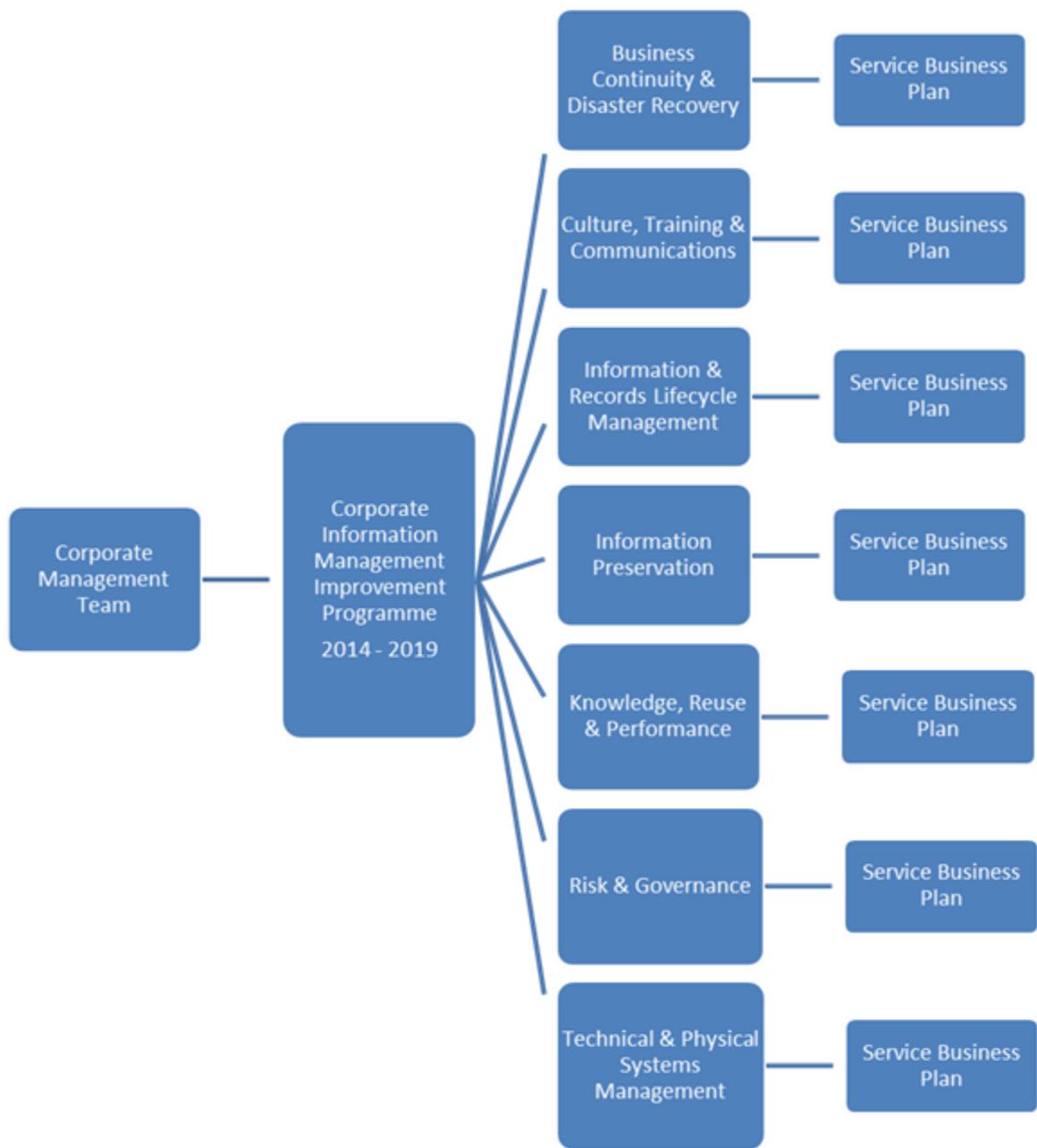
- Business Continuity & Disaster Planning
- Culture, Training & Communications
- Information & Records Lifecycle Management
- Information Preservation
- Knowledge, Reuse & Performance
- Risk & Governance
- Technical & Physical Systems Management

Each domain will be led by appropriate specialist job roles (please refer to Element 12: Competency Framework for Records Management for further information on these roles) who will drive work toward maturity in each domain, by putting in place the necessary corporate policies, procedures and protocols, and who will work with Information Asset Owners and Administrators, and Liaison Officers in each Directorate and Service to embed good practice by integrating required improvements into individual Service Business Plans.

Figure 1, below, extracted from the Information Management Strategy, shows key corporate priority areas from each domain; Figure 2, below, shows how each domain will feed into each Directorate and Service Business Plan to ensure consistent maturity in practice is achieved across the organisation.



**Figure 1**



**Figure 2**

Within this framework, the Council has revised and renamed its Records Management Policy in alignment with our Information Management Strategy:

the Council's Information Lifecycle Management Policy ([Appendix 9](#)) has recently been approved, which will:

- i) Build an infrastructure that ensures the effective management of all our business information and records throughout their lifecycle
- ii) Provide the core foundation for delivering maturity in the six other strategy domains.

The Information Lifecycle Management Policy comprises the Council's Policy Statement on Records Management, which covers the records created and managed by third parties, where third parties carry out functions on behalf of the Council. In practice, ensuring appropriate records management practice in such cases will be managed through contractual agreement. Going forward, under the corporate Information Management Strategy Improvement Programme, the Council will drive implementation of the appropriate contractual agreement, and on-going contract management through the Risk and Governance domain, which will allow all key stakeholders to work together to reach maturity in this area of information management practice through the SIRO governance and reporting mechanisms.

The Information Lifecycle Management Policy is supported by three linked corporate policies, which will provide the framework by which the Council assure effective management of all our business information and records throughout their lifecycle:

- Business Classification Scheme Policy ([Appendix 10](#))
- Records Retention and Disposal Schedule Policy ([Appendix 11](#))
- Information Asset Register Policy ([Appendix 12](#))

Going forward, all corporate policies falling within the 7 Information Management Strategy domains will align to the Information Management Strategy objectives, governance and reporting structure, ensuring that the Council's approach is consistent, holistic and user friendly.

Collaboration has begun between the Information and Lifecycle Management and Physical and Technical Systems Management domains to develop the following guidelines:

- Migrating and Transferring electronic records from one system to another  
These guidelines will encompass three levels of detail targeting system user, system administrator and system owner and accessibility and governance arrangements will be established and maintained through

the Physical and Technical Systems Management and Culture, Communication and Training domain of IMS.

- Metadata and system design

An externally hosted workshop – Metadata and system design - was run in October 2014 and attended by 8 key representatives straddling 3 IMS domains, Information and Records Lifecycle Management, Knowledge Re-Use and Performance and Physical and Technical Systems Management. Information & Records Lifecycle Management will lead on this work initially as part of the project plan pilot due to commence in the New Year for a 2 year period where record class and metadata standards will be built into the Business Classification Scheme and Information Asset Register.

## 4. Business Classification Scheme

The Council has a corporate Business Classification Scheme ([Appendix 13](#)) which is the Council's framework for classifying and managing our information and records, based on our key functions and activities.

The Business Classification Scheme will provide the framework for consistently applying the Council's Records Retention and Disposal Schedule to the Council's information and records, making sure that we retain what we need for our business, and dispose of what is no longer required. The Business Classification Scheme will also provide the framework for ensuring that the Council's Information Asset Register makes clear links between the Council's Information Assets and their business purpose.

The Business Classification Scheme template represents a consolidation of business function, activity and transaction detail collated from all 140 Council business areas during August 2013 – June 2014, whilst developing Service File Plans. Please see a sample from each of service of the Corporate Governance file plans ([Appendix 14](#)), as follows:

- Corporate Governance – Legal & Democratic - Committee Services
- Corporate Governance – Human Resources & Organisational Development- Organisational Development
- Corporate Governance – Customer Service & Performance – Information & Research Team
- Corporate Governance – Commercial & Procurement Unit – Programme Management Office
- Corporate Governance – Finance – Corporate Accounting Projects

Every Council team will manage the information and records created, used and managed by their teams, regardless of the technical or physical format or age of the information or record, in accordance with the corporate Business Classification Scheme, using these service level file plans. The Business Classification Scheme provides the first three levels, determined by the core and corporate business functions onto which every team and services folder structure and service level file plans will be mapped.

The Information Lifecycle Management project work will commence a programme of work to pilot, test and refine, and implement the corporate Business Classification Scheme via service level file plans across the Council, using the corporate Information Asset Register and aligning with the corporate Records Retention & Disposal Schedule.

Over 2015-16, the Council completed an initial Business Classification Scheme pilot project, which will inform our wider implementation approach, and completed work on compiling our Information Asset Register, which will form the evidence base for prioritising and managing this work in 2016-17 and beyond.

## 5. Retention and Disposal Schedule

The Council has in place a Records Retention and Disposal Schedule (Appendix 15) which sets out the corporately agreed retention periods and actions for Council and Licensing Board information and records. The Records Retention & Disposal Schedule aligns to the Council's Business Classification Scheme.

In 2015 the Council created a fully searchable version of its Records Retention & Disposal Schedule, hosted on our intranet, to support all staff to adhere to the corporate Records Retention & Disposal Schedule (Appendices 16, 17, 18, 19, 20)

## 6. Destruction Arrangements

The Council has in place a corporate contract for the destruction of confidential waste ([Appendix 21](#)) from an external supplier. All staff are guided in selecting appropriate destruction methods by Corporate Practice and Procedures: Managing Information ([Appendix 22](#)) and this will be further embedded into practice and procedures across business areas as the Information and Records Lifecycle Management project work gets underway and service file plans are implemented. The Council uses an external company to recycle all ICT hardware which is managed through our ICT Helpdesk. The Council maintains records of all hardware destroyed:

- Customer Receipt ([Appendix 23](#))
- Waste Transfer Note ([Appendix 24](#))
- Signed Site Sheet ([Appendix 25](#))
- Destruction Certificate ([Appendix 26](#))

The Council has a contract for the hosting, management and availability of ICT server infrastructure from an external supplier, including back-up and disaster recovery.

## 7. Archive Transfer Arrangements

The Council's recognised place of deposit for information scheduled for permanent preservation is Aberdeen City & Shire Archive, a service the Council shares with Aberdeenshire Council. The Council has an [Archival Transfer and Acquisition Policy](#) which sets out our commitment to information preservation.

Aberdeen City & Aberdeenshire Archives have in place [Guidance for Depositors](#), which provides information for depositors on what they can expect.

## 8. Information Security

The Council has a corporate Information Security Policy ([Appendix 27](#)) which sets out our commitment to information security. Any information security breaches are managed in accordance with the Corporate Information Security Breach Reporting Procedures ([Appendix 28](#)).

The Council has a corporate ICT Acceptable Use Policy ([Appendix 29](#)) for all staff and Elected Members.

The Council has in place Managing Information Corporate Procedures ([Appendix 22](#)) which support staff in maintaining good information security practice on a day to day basis. In addition, the Council publishes regular Information Security Advisories for staff on our intranet pages to disseminate good practice, promote awareness, and highlight key areas of information security risk ([Appendix 30](#)).

All staff are required to undertake mandatory Information Security training, which is delivered via our online interactive learning (OIL) system ([Appendix 31](#)). Work has recently been completed on a single mandatory induction and refresher online learning module for all staff around core Council policies, which brings together key messages on Information Management, Data Protection, Information Security, and Freedom of Information.

The Council operates two corporate records stores for the management of hard copy records: one onsite store at the Council's corporate headquarters, and one offsite store. These stores are managed by a specialist team who control and supervise access to the records, in accordance with the Records Storage & Retrieval Procedures ([Appendix 32](#)). The Council operates a specialist store for the management of social work client records, which is managed by a specialist team who control and supervise access to the records.

Corporately, the Council are implementing a Smarter Working Programme, which combines a programme of office rationalisation with the promotion of more flexible working styles; a key facilitator for the adoption of Smarter Working is good information and records management practice; accordingly, all teams are required to audit and review practice in relation to hard copy records management as a key component of adopting Smarter Working, with the result that all teams who have been through Smarter Working implementation:

- Secure all business information and records in fit for purpose lockable on floor storage, or within corporate records storage (for hard copy records to which less frequent access is required).
- Keep a clear desk

1500 of the Council's 7000 staff have currently implemented Smarter Working, with the remainder of Council staff scheduled to implement Smarter Working over the next two years.

Going forward, under the corporate Information Management Strategy Improvement Programme, the Council will consider and manage issues around information security as part of the Technical and Physical Systems Management domain, which will allow all key stakeholders to work together to reach maturity in this area of information management practice through the SIRO governance and reporting mechanisms.

## 9. Data Protection

The Council has a corporate Data Protection Policy ([Appendix 33](#)) which sets out our commitment to compliance with the Data Protection Act 1998. This was updated in 2015, in accordance with the recommendations of the Phase Two internal audit report on Public Records (Scotland) Act compliance. In addition, the Council has a Corporate CCTV Procedure ([Appendix 38](#)), which governs the Council's use of CCTV and the processing of any personal data recorded by the use of CCTV.

Breaches of the Data Protection Act must be reported in accordance with the Council's Data Protection Policy, using the Council's breach reporting form ([Appendix 34](#)), available on the Council's intranet pages. Compliance with the Data Protection Act 1998 is reported on quarterly to the Council's Audit, Risk & Scrutiny Committee. The Council invited the Information Commissioner's Office to undertake an [audit of compliance with Data Protection](#), which was undertaken in April 2013.

All staff undertake mandatory Data Protection training, which is delivered via our online interactive learning (OIL) system. Additional in depth face to face training is delivered to staff who handle sensitive personal information as part of their core job, for example, staff delivering Social work and Education functions. The Council's Social Work Case Recording Policy ([Appendix 35](#)) and Social Work Case Recording Procedure ([Appendix 36](#)) provides further, more specialised information about facilitating subject access for social work clients in recognition of the importance of promoting the rights of individuals, whilst exercising our duty of care in providing statutory services in an open and transparent way.

Work has recently been completed on a single mandatory induction and refresher online learning module for all staff around core Council policies, which brings together key messages on Information Management, Data Protection, Information Security, and Freedom of Information.

The Council's Data Protection Policy brings together a range of procedures to support staff in managing Data Protection Act compliance as part of their day to day activities, including collecting personal information, managing subject and third party access to personal information, sharing of personal information, and reporting personal information incidents.

In addition, the Council has clear information on its website [explaining how to make a subject access request](#) (SAR), explaining an individuals' right to personal information. [Specific \(SAR\) guidance](#) has been created for individuals who have received a social work or education service from the

Council, which may include highly sensitive information, in recognition that we promote the rights of individuals whilst exercising our duty of care in providing statutory services in an open and transparent way.

The Council has the following additional procedures in relation to Data Protection compliance, available to all staff on the Council's intranet pages:

- [Routine Data Sharing Procedure \(Appendix 37\)](#)
- [Corporate CCTV Procedure \(Appendix 38\)](#)
- [Data Processing by an External Agency \(Appendix 39\)](#)
- [Transferring Data Overseas Procedure \(Appendix 40\)](#)
- [Transfer of Pupil Records Procedure \(Appendix 41\)](#)
- [Notification Procedure \(Appendix 42\)](#)

Specialist advice and support on data protection compliance matters is provided across the Council by Legal Services, in the Council's Corporate Governance Directorate.

Going forward, under the corporate Information Management Strategy Improvement Programme, the Council will consider and manage issues around Data Protection compliance as part of the Risk & Governance strand of the Information Management Strategy Improvement Programme.

## **10. Business continuity and vital records**

The Council has a corporate Business Continuity Policy ([Appendix 43](#)), which sets out how we intend to provide critical services in the event of a disaster or emergency. The Council is currently conducting a test and review phase of work, based on the outcomes of the internal audit recommendations ([Appendix 44](#)), ensuring the quality assurance of critical function Business Continuity Plans, and the quarterly reporting of progress to the Council's Corporate Management Team.

Going forward, under the corporate Information Management Strategy Improvement Programme, the Council will consider and manage information and records related issues around Business Continuity as part of the Business Continuity and Disaster Management domain of the Information Management Strategy framework, which will allow all key stakeholders to work together to reach maturity in this area of information management practice.

## 11. Audit Trail

The Council currently manage their information and records through a number of corporate systems:

- Hardcopy – corporate records stores (on and off-site), Social Work Record store, office accommodation secure storage
- Electronic – corporate shared drives, bespoke ICT applications, email

An audit trail, from accession to disposal, can be evidenced for all hard copy records managed within the on and offsite Corporate Records Stores; please refer to the extracts for the last complete financial year, from the following logs and registers or the offsite Corporate Records Stores:

- Accession Log ([Appendix 45](#))– record of all accessions to corporate storage in chronological order
- Internal Loans Register ([Appendix 46](#)) – record of all retrieval from and returns to corporate storage in chronological order
- Destruction Log ([Appendix 47](#)) - record of all disposals from corporate storage in chronological order.

The management of hard copy records in secure on-floor storage is undertaken by individual business areas, who have systems which meet with their individual business requirements. Staff are supported in good practice by Corporate Managing Information Practices and Procedures ([Appendix 22](#)), which provides foundational guidance on information and records management, including version control, naming conventions, and disposal of records; please refer to the attached example of a service level Disposal Register ([Appendix 48](#)).

In relation to evidencing appropriate audit trails for information and records created or held in electronic format, as outlined above, the Council has in use a very broad range of systems in place, which include specialist content, case, asset and customer relationship management systems, as well as shared drives and email. The key systems currently in use are as follows:

- CareFirst: Social Care Client records
- I-World: Housing Tenant records
- Confirm: Asset management systems used for all carriage and footways, and street furniture.
- Lagan: Customer Relationship Management
- Flare: Case management system used to manage Environmental Health, Trading Standards and Planning Records

- Seemis: Children's Educational Records

Whilst these systems allow the evidencing of audit trails in relation to creation, alteration and disposal of records within them, there is currently no corporately agreed standards or system in place for evidencing the audit trail of all Council information and records.

The mechanisms in place for all other information and record systems will be explored in further detail as part of the Information and Records Lifecycle Management project work; as the framework for developing the foundations of an operational and strategic audit trail that is governed through the corporate policy and practice standards of the broader Information Management Strategy domains and Senior Information Risk Officer reporting mechanisms.

## 12. Competency framework for Records Management

Records Management is led by the Information Management Team, a specialist team responsible for:

- Providing corporate support across the organisation on managing electronic and hard copy records and information, in accordance with business requirements and the Council's responsibilities under the Public Records (Scotland) Act 2011.
- Providing a Records Storage and Retrieval Service from the on and offsite Corporate Records Stores.

The job roles and responsibilities, as well as the skills and competencies which the Council has identified necessary for successfully undertaking these roles are as follows:

- Information Manager ([Appendix 4](#))
- Senior Information Compliance Officer ([Appendix 5](#))
- Information Management Adviser (3) ([Appendix 6](#))
- Information & Records Stores Officer ([Appendix 7](#))
- Information Compliance Assistants (2) ([Appendix 8](#))

The Information Management Strategy framework comprises 7 domains, each led by specialist job roles, which will support the collaborative approach and improvement programme of works that meet the business, legislative and statutory needs of all business functions across the Council:

Business Continuity & Disaster Management:

Emergency Planning manager  
Performance & Risk Manager

Culture Communications & Training:

Team Leader, Organisational Development  
Internal Engagement Manager

Information & Records Lifecycle Management:

Information Manager  
Information Management Adviser (x3)  
Information and Records Store Officer  
Information Management Assistants (2)

#### Information Preservation:

- City Archivist
- Archivists (2)
- Archives Assistants (2)

#### Knowledge, Reuse & Performance:

- Performance & Transformation Manager
- E-Government Manager
- Information & Knowledge Management Adviser

#### Risk & Governance:

- Performance & Risk Manager
- Performance & Transformation Manager
- Team Leader, Commercial & Advice
- Governance Support Officer

#### Physical & Technical Systems Management

- ICT Manager
- Enterprise Architect
- Information Security Officer
- ICT Project Executive

In addition to the specialist roles outlined above, the Council recognises that information and records management is a core part of everyone's job, and as such have a core mandatory programme in place for all staff, which currently comprises OIL modules on Information Security, Data Protection, and Freedom of Information. This core mandatory programme is supplemented by more in depth face to face training as appropriate. Over 2015 a single mandatory induction and refresher training for all staff covering information risk and compliance has been developed, and will be rolled out to all staff in 2016.

Going forward, under the corporate Information Management Strategy Improvement Programme, the Council will consider and manage information & records related issues around information and records management competency as part of the Culture, Training & Communications domain of the Information Management Strategy Improvement Programme, which will allow all key stakeholders to work together to reach maturity in this area of information management practice.

## 13. Assessment and Review

The Council commissioned Internal Audit to undertake a 2 part investigation into the Council's readiness to submit a Records Management Plan in compliance with our Public Records (Scotland) Act 2011 responsibilities, as follows:

- [Phase One](#) – Assess the ACCs readiness to evidence compliance with the 14 elements of the Records Management Plan
- [Phase Two](#) – Assess management plan for compliance monitoring the policies and procedures cited for each of the 14 Elements Records Management Plan.

The Phase One report was considered by the Council's Audit, Risk & Scrutiny committee in November 2014, who endorsed the recommendations made for improvement. The Phase Two report was considered by the Council's Audit, Risk & Scrutiny Committee in June 2015; progress on the completion of the actions raised within the report is managed on an ongoing basis through the same committee.

As outlined above, the Council has adopted an updated Information Management Strategy, and associated improvement programme which sets out a commitment to implement a holistic, developmental approach to information management, led and governed by the Senior Information Risk Officer and key information management domain specialists (7), in collaboration with Information Asset Owners. The Senior Information Risk Officer will be accountable for the progress of the Information Management Strategy Improvement programme to the Council's Corporate Management Team, via quarterly progress reporting.

Whilst the Council and Licensing Board view their Records Management Plan as a living document, in accordance with our developmental approach to information management, it is committed to providing formal updates on an annual basis to the Keeper on its progress.

## 14. Shared Information

The Council and Licensing Board have in place Corporate Data Protection Procedures governing the sharing, transfer and processing of personal information, which include information on when and how an Information Sharing Protocol ([Appendix 49](#)) may be entered into:

- Routine Data Sharing Procedure ([Appendix 37](#))
- Data Processing by an External Agency ([Appendix 39](#))
- Transferring Data Overseas Procedure ([Appendix 40](#))
- Transfer of Pupil Records Procedure ([Appendix 41](#))

In accordance with the recommendations of the Phase Two Internal Audit report recommendations, the Council is currently developing an Information Sharing protocol register.

## Further Information

For further information about Aberdeen City Council's Records Management Plan, please contact [Caroline Anderson](#), Information Manager.

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<b>Revised by</b>	Helen Cannings

