



Aberdeenshire Council and Aberdeenshire Licensing Boards

Records Management Plan (RMP) and Evidence List

Demonstrating Records Management
Arrangements within the Council and
the Licensing Boards under Section 1
of the Public Records (Scotland) Act
2011

FINAL

Version 1.1 (Redacted version – internal hyperlinks and personal data removed)

Report Compiled by:

Information Management Project Co-ordinator

Contents

1.0 Introduction	4
2.0 Structure of the Evidence List	5
3.0 Statement of Compliance.....	6
Element 1: Senior Management responsibility:.....	6
Element 2: Records Manager responsibility:.....	8
Element 3: Records Management Policy Statement:.....	10
Element 4: Business classification	12
Element 5: Retention schedules.....	14
Element 6: Destruction arrangements	16
Element 7: Archiving and transfer arrangements	19
Element 8: Information security.....	21
Element 9: Data protection	23
Element 10: Business continuity and vital records	25
Element 11: Audit trail	27
Element 12: Competency framework for records management staff.....	29
Element 13: Assessment and review	31
Element 14: Shared Information.....	33
Annex A: Evidence List	35

Document Control Sheet

AUTHOR: Information Management Project Co-ordinator

DOCUMENT TITLE: Public Records (Scotland) Act 2011 –
Records Management Plan and Evidence List

Review/Approval History

Date	Name	Position	Version Approved
13/12/2013		Information Management Project Assistant	
		Information & Records Management Manager	
		Information Management Programme Manager	
13/06/2014		Information Management Project Assistant	Review
07/01/2015		Information Management Project Coordinator	Review
09/01/2015		information Management Project Coordinator	Review
09/07/2015		Information Management Project Coordinator	Review
30/07/2015	Jim Savege	Chief Executive	Final version and signature
19/10/2015		Information Management Project Coordinator	Amendments as per NRS interim report

Status Description:

Draft - These are documents for review and liable to significant change.

Final - The document is complete and is not expected to change significantly.

All changes will be listed in the change record table.

1.0 Introduction

Under the Public Records (Scotland) Act 2011 (PRSA) named public authorities across Scotland, including Aberdeenshire Council (Council) and the Licensing Boards, are required to put in place appropriate records management arrangements by producing and implementing a Records Management Plan (RMP) within their organisation. These arrangements will show effective, efficient and systemic control of the creation, storage, retrieval, maintenance, use and disposal of records including processes for capturing and maintaining evidence. This systemic management of records is particularly significant because it will allow the organisation to:

- increase efficiency and effectiveness
- make savings in administration costs, both in staff time and storage
- support decision making
- be accountable
- achieve business objectives and targets quicker
- provide continuity in the event of a disaster
- meet legislative and regulatory requirements
- protect the interests of employees, residents and stakeholders

The extent of the Council and Licensing Boards RMP includes the management framework, policies, procedures, record management systems, technologies and tools employed within the organisation to ensure that its records are managed effectively and efficiently to be in compliance with legislation as well as satisfying business needs. This document summarises each of the elements of the PRSA and provides evidence of records management arrangements that are in place demonstrating compliance with the PRSA. This includes both corporate evidence, such as policies, procedures, standards and where applicable local application of these. Also contained herein are provisions for future improvements on each of the fourteen elements as planned by the Council and the Licensing Boards in the next couple of years as well as actions that will be taken to ensure the identified developments are achieved within these timescales.

An improvement plan incorporating action areas for improvement on each element linked directly to this RMP for the Council corporately; the Licensing Boards as well as each Service in order to ensure a culture of continuous records management improvement is attached to this RMP. Progress of the content of this document will be monitored through a standing agenda item at the meetings of the Records Management Group, or whichever body replaces this Group within the new Information Governance structure once concluded.

2.0 Structure of the Evidence List

The Evidence List identifies, in a sequential order, evidence that supports the council and Licensing Boards RMP. Some documents are used as evidence in more than one element. To minimise duplication, only one copy of each document will be held on file. The list of evidence submitted with this RMP has been annexed as “**Annex A**”. The Information Management Policy and the Information Management Strategy support all fourteen elements of the PRSA and stand as overarching evidence for all elements.

3.0 Statement of Compliance

Element 1: Senior management responsibility

Introduction

Element 1 is compulsory and covers **Senior Management Responsibility**. Section 1(2) (a) (i) of the Act requires the Council's RMP to identify the person at senior level who has overall strategic responsibility for records management.

The RMP must name and provide the job title of the senior manager who accepts overall responsibility for the RMP that has been submitted.

Statement of Compliance

The Senior Accountable Officer for Records Management within Aberdeenshire Council and the Divisional Licensing Boards is:

Ritchie Johnson
Director of Business Services
Aberdeenshire Council
Woodhill House
Westburn Road
ABERDEEN
AB16 5GB
Tel: 01224 665490

Mr Johnson began in the above post on 01 October 2015, succeeding Alan Wood who was named as the Senior Accountable Officer in the original submitted version of this Records Management Plan.

The Chief Executive and the Accountable Officer fully endorse this plan and will ensure that the required improvements within the Council and Licensing Boards to records management Principles and procedures are implemented corporately and in an effective manner.

Evidence of Compliance

Primary evidence submitted in support of Element 1:
Item 001 Statement from Chief Executive 2015
Item 002 Statement from Senior Accountable Officer 2015

Supporting evidence submitted:
Item 003 Information and Records Management Strategy 2013
Item 004 Information and Records Management Policy 2013
Item 005 Information and Records Management Policy Cover Report to Policy and Resources Committee 2013

Future Developments

There are no planned future developments in respect of Element 1. Any further changes going forward will be reflected in policies and procedures.

Assessment and Review

This element will be reviewed in the event of any relevant change in personnel, roles and/or responsibilities.

Responsible Officer

Jim Savege, Chief Executive

Element 2: Records Manager responsibility

Introduction

Element 2 is compulsory and covers **Records Manager responsibility**. Section 1(2)(a)(ii) of the Act specifically requires a Records Management Plan to identify the individual responsible for ensuring the authority complies with its plan. An Authority's RMP must name and provide the job title of the person responsible for the day-to-day operation of activities described in the elements in the authority's RMP.

Statement of Compliance

The individual answerable to Senior Management within Aberdeenshire Council and who has operational responsibility for records management within the Council is:

Information Management Project Co-ordinator
Business Services – ICT
Aberdeenshire Council
Woodhill House
Westburn Road
Aberdeenshire
AB16 5GB
TEL: 01224 664837

The individual answerable to Senior Management within Aberdeenshire Divisional Licensing Board(s) and who has operational responsibility for records management within the authority is:

Ritchie Johnson
Director of Business Services
Aberdeenshire Council
Woodhill House
Westburn Road
ABERDEEN
AB16 5GB
Tel: 01224 665490

Mr Johnson began in the above post on 01 October 2015, succeeding Alan Wood who was named as the Senior Accountable Officer in the original submitted version of this Records Management Plan.

Evidence of Compliance

Primary evidence submitted in support of Element 2:
Item 006 Statement from Information Management Project Co-ordinator
Item 002 Statement from Senior Accountable Officer 2015

Supporting evidence submitted:
Item 007 Information Management Project Co-ordinator Job Profile

Future Developments

Any future changes relating to this element will be published and included in the Improvement Plan as appropriate

Assessment and Review

N/A

Responsible Officer

Information Management Project Co-ordinator

Element 3: Records Management Policy Statement

Introduction

Element 3 is compulsory and covers the **Records Management Policy Statement**. This will serve as a mandate for the activities of the Records Manager and any other governance group that will have the responsibility of information and records management. It shows how the Council and the Licensing Boards creates and manages authentic, reliable and useable records capable of supporting business functions and activities for as long as they are required through any organisational or system change irrespective of format. The Policy Statement reflects the business functions of the Council and Licensing Boards, provides an overarching statement of the organisation's priorities and intentions in relation to recordkeeping, and delivers a supporting framework for the development and implementation of a records management culture.

Statement of Compliance

A consolidated and revised Information Management Policy, reflective of the recordkeeping arrangements in place for the Council as a whole was approved by Policy and Resource Committee at the meeting on 19 September 2013. The Policy document sets out the principles and the responsibilities of information management in the Council under a wide range of headings that are key to records management. The Policy has also been ratified by the 3 Licensing Boards in April 2015 and therefore applies to both the Council and Licensing Boards

The purpose of the Information Management Policy is to define the framework by which information held by Aberdeenshire Council and Licensing Boards is managed in compliance with legislation and according to clearly defined procedures and controls governing the creation, indexing, storage, publication, use, retrieval, revision, retention and disposal of information, whatever its format.

As with the previous version, the Policy has been published on the Council's intranet since its approval and communicated to the Records Management Group for further communication in Services.

Evidence List

Primary evidence submitted in support of Element 3:

Item 004 Information and Records Management Policy 2013

Item 003 Information and Records Management Strategy 2013

Supporting evidence submitted:

Item 008 'Innovate Aberdeenshire' Digital Strategy 2015 – 2020

Item 009 ICT Business Plan 2013 – 2016

Item 010 Business Systems List 2015

Item 005 Information and Records Management Policy Cover Report to Policy and Resources Committee 2013

Item 011 Extract of the Minutes of the P&R Committee meeting approving the Policy

Item 012 Information and Records Management Policy Report to South, Central and North Licensing Boards

Item 013 Extract of the Minutes of the Central Licensing Board meeting approving the Policy

Item 014 Extract of the Minutes of the North Licensing Board meeting approving the Policy

Item 015 Extract of the Minutes of the South Licensing Board meeting approving the Policy

Future Developments

The Council has a number of Electronic Documents Management Systems, some of which are used to store and manage electronic records. Most of these systems are integral to business systems and are used to store information generated by that system. Only one Electronic Document Record Management Systems (EDRMS) – HP Records Manager 8 (RM8; recently upgraded from and often referred to as TRIM) – is used to store individually created documents, albeit not Council wide.

The Council has started the development of MS SharePoint, to be implemented across the Council starting in 2015. Options are being explored at the moment to either create an interface directly to SharePoint or purchasing Records Management add-ons. These combined platforms will provide the basis for a new Records and Information Management culture across the Council and Licensing Boards. All areas within the Council are working together to ensure that this will be the case.

Assessment and Review

The Policy will be reviewed as required and also after each major business or technological change such as any programme, project or initiative that might affect the content of the policy therein. Other supporting guidance and procedures will be reviewed on an ongoing basis as stipulated by the Records Management Group, or whichever body replaces this group within any new Governance Structure.

Responsible Officers

Ritchie Johnson, Director of Business Services

Nicola Graham, Head of ICT

Element 4: Business classification

Introduction

Element 4 covers the Business Classification Scheme and it is expected that the council and Licensing Board should have appropriate arrangements in place to assess its core business functions and activities represented in a business classification scheme. Such arrangement should therefore be evidenced in the Council and Licensing Boards RMP either as a complete document or as a work in progress.

A business classification scheme usually takes the form of a hierarchical model or structure diagram. It records, at a given point in time, the information assets the business creates and maintains, and in which function or service area they are held. As authorities change the scheme should be regularly reviewed and updated.

Statement of Compliance

Aberdeenshire Council and the Licensing Boards have adapted the Local Government Classification Scheme (LGCS) as a basis to its business classification scheme. The scheme is developed in a structure that supports the business activities of the authority. It is clearly stated in the Information Management Policy 2013 that the Local Government Classification Scheme is to be used as a basis for the development of the file plan. This has been systematically done in services undertaking records management projects. Work is currently underway in different Services to get their file plans in line with the LGCS and a schedule of work has been developed by each service for this as reflected in the Improvement Plan

A file plan has been developed and is maintained up-to-date for use in RM8. This is based on the LGCS and was created from records audit carried out in the Services using RM8. The file plan currently has 22 main classes that are accessible to all RM8 users. Some of the classes are more developed than others depending on the requirements and needs of the teams and have sub-classes.

Only users identified as System Administrators in RM8 have the permission to create classes. Generally restriction on access and retention schedule is set at what is known as book level, which is a sub level of classes. Therefore users identified as Power Users may create folders which inherit the security and retention of the book level, unless further restrictions or a different retention period is required. A published version of the file plan is available on the Council's intranet. This version is reviewed every two years to ensure consistency with the RM8 setup.

The LGCS is available to staff on the Council's intranet. It is recognised that the LGCS is not implemented on shared drives throughout the Council.

In preparation for the move of information from shared drives to SharePoint, some Services within the Council are already developing, and moving to,

LGCS file structures. This will further be developed as shared drives are analysed and cleansed Council wide.

Evidence of compliance

Primary Evidence

Item 016 Screen Shot from Arcadia showing File Plan classes

Item 017 Local Government Classification Scheme

Item 018 File Plan Appointed main classifications

Item 019 Screen Shot of RM8 showing 22 classes

Item 020 Improvement Plan

Future Developments

Currently, work is underway to develop and make recommendations for a new Information Governance Structure with the intention of rolling it out across the Council once it has been approved by Senior Management. This Governance Structure and classification scheme will be in place before the Council migrates any information from shared drives to MS SharePoint. These developments will ensure that the classification structure remains intact with only authorised staff authorised to make approved changes to any part of the scheme.

Assessment and Review

Once the actions on this element have been completed, an actual assessment and review procedure will be developed and cascaded to all services within the Council. This will allow for the business classification scheme and file plan to be maintained up to date.

Responsible Officer

Information Management Project Co-ordinator

Element 5: Retention schedules

Introduction

Section 1(2)(b)(iii) of the Act specifically requires a RMP to include provision on the archiving and destruction or other disposal of the Authority's public records.

The Council's RMP must demonstrate the existence of and adherence to Corporate records retention procedures. The procedures should incorporate retention schedules and should detail the procedures that the authority follows to ensure records are routinely assigned disposal dates, that they are subsequently destroyed by a secure mechanism at the appropriate time, or preserved permanently by transfer to an approved repository or digital preservation programme

Statement of Compliance

The Council and Licensing Boards have adopted the Scottish Council for Archives Records Retention Schedule (SCARRS) model. This applies to both electronic and paper records. Specific retention schedules, based on SCARRS, have been developed for some services.

Application of the retention schedules is taking place in the Electronic Documents and Records Management software RM8 where records are assigned at creation a retention period and disposal action. A search is carried out monthly to establish if the retention period has reached its end. A similar process will be undertaken in future for any records stored in SharePoint; the Council is currently assessing options for how this will be implemented and will ensure appropriate governance is in place before SharePoint becomes used for Records Management when it has been rolled out throughout the Council and Licensing Boards.

Application of the retention schedules to paper records is completed as the regular physical storage clear outs takes place in identified storage areas. For records of historical value, these are transferred to the Aberdeen City and Aberdeenshire Archives Service (the Archive Service) as the audit is progressed.

When records are transferred to the appointed offsite facility, managed by a third party RSS Ltd, the destruction date for records stored must be indicated in the deposit schedule. This allows the service responsible to be alerted when destruction is due.

Whilst retention schedules should be adhered to, information held within business systems and shared drives is not rigorously applied in all cases. This shortcoming has been identified and highlighted within the Improvement Plan attached to this document.

The adoption of alternative email software across the Council and Licensing Boards has also triggered work in relation to retaining the legacy of records in email format. Retention of legacy email messages has been discussed and

has been approved by ICT Steering Group. This is now being implemented throughout the organisation.

Evidence of Compliance

Primary evidence submitted in support of Element 5:

Item 021 Infrastructure Services Retention and Disposal Schedule

Item 022 HR&OD Retention and Disposal Schedule Draft

Item 023 Finance Retention and Disposal Schedule

Item 024 Criminal Justice Retention and Disposal Schedule

Item 025 Housing Retention and Disposal Schedule

Item 026 Adult Services Retention and Disposal Schedule

Item 027 Screenshot from RM8 of records closed and retention triggered

Item 028 Minutes of ICT Steering Group regarding retention of legacy email messages (30.10.2013)

Future Developments

Work has started by the Archive Service as part of their Development Plan for the Aberdeen City & Aberdeenshire Archive Service, on a digital preservation strategy so that electronic documents can be transferred to the Archive Service.

It is acknowledged that application of retention schedule is not consistent across the Council and Licensing Boards. The implementation of parts of the Information Management Programme recommendations, combined with other transformation programmes such as WorkSpace (reduction and refurbishment of office space) and WorkSmart (flexible working) is highlighting the record management and retention schedule requirements with a programme that will encourage staff to apply rigor to information management. This has had excellent results in the implementation much enhanced of records management. In addition the ability of MS SharePoint to identify information for disposal or archiving will further aid the application of the schedules. As information is transferred from shared drives to MS SharePoint, retention schedules and naming conventions will be applied to ensure compliance. This use of SharePoint, either interfaced with RM8 or with any add-on, will allow the Council and Licensing Boards to rigorously apply retention policies.

A Retention and Disposal Policy covering the Council and Licensing Boards, detailing how the schedule works, is currently being developed along with Service specific policies where these are required.

Assessment and Review

Work in relation to the review of existing policies, and development of new policies if required, will be monitored through the Records Management Group or the appropriate body within any new Governance Structure.

Responsible Officer

Information Management Project Co-ordinator

Element 6: Destruction arrangements

Introduction

Element 6 is compulsory and covers Destruction Arrangements.

Section 1(2)(b)(iii) of the Act requires the Council to include provision about the destruction, or other disposal, of the Council's public records and to ensure proper destruction arrangements are in place.

Statement of Compliance

The Council and Licensing Boards have in place arrangements to destroy records that have been identified for destruction.

For paper documents requiring secure destruction:

Following a competitive tender process, a third party supplier ShredIt was appointed in 2014 to provide on-site shredding facilities for paper records and documents.

ShredIt demonstrated tight compliance with legislation on waste and personal data both in terms of vehicle and premises security and staff vetting. Locked consoles are placed at specific locations in the offices for staff to place documents requiring secure destruction in. Contents of consoles are regularly collected by ShredIt staff and destroyed on or very close to the organisations premises.

ShredIt is also contracted to destroy documents and materials securely when physical clearouts of offices and storage areas take place.

For information in other formats requiring secure destruction:

ShredIt also deals with other media such as Tapes (Video, Audio, and Data) Microfiche, ex-Staff ID cards, Taxi licence plates, CDs/DVDs. For these formats, Services collect the records in a secure area within the office and contact ShredIt for an uplift. The records are taken to ShredIt premises and destroyed securely. As for paper documents, ShredIt is also contracted to destroy materials securely when physical clearouts of offices and storage areas take place.

The current contract with Shred It extends to all corporate offices and schools. Shred it provides certificates of destruction to ensure all items are destroyed following relevant statutory requirements.

Electronic Records

For electronic records saved in RM8, a procedure is in place to search for and destroy records that have reached their retention period. The search is carried out every month by the Power Users of the system. Records are destroyed on approval from the Service responsible for the records. The metadata stub is retained and is only visible to staff identified as Information and Records Manager in the system. This allows for a list of destroyed records to be

retained as per the requirements of Freedom of Information (Scotland) Act 2002 Section 61.

Destruction of electronic records held in other, bespoke business systems depends largely on the system's capability. There is no standard procedure for such destruction and no automatic link to a retention schedule. However, it is considered that procedures in place for destruction of physical records could be applied in some way (and with some modification) to electronic records. There is a recognised need to include a retention and disposal facility as part of requirements specifications for new systems (or upgrades to existing systems) that are procured, and this is included in the Improvement Plan attached to this document. It is intended that this, together with the development of a retention schedule, should resolve the current shortcomings.

At present there is little or no control of information that is deleted from shared drives. Whilst it is recognised that most of the information on these drives is accurate and up to date there are no set procedures in place to cover the management of information from this storage media. This is recognised and being addressed in conjunction with the implementation of a standard classification Scheme. As part of this exercise, shared drives are profiled by age with the oldest files highlighted and reviewed and then deleted unless subject to specific retention policies.

Hardware

All hardware is securely disposed of under contract with Eco systems. This includes the cleansing and destruction of hard drives.

The Council and Licensing Boards is undertaking work, driven by the Information Management Team, to review and consolidate procedures in relation to the destruction of back up copies of records including tapes, optical media and electronic data.

Evidence of Compliance

Primary evidence to be submitted in support of element 6:
Item 004 Information and Records Management Policy 2013
Item 030 Shred-It Response Attachment
Item 031 Signed Letter of Acceptance of Tender
Item 032 Terms and Conditions Confidential Waste

Secondary Evidence

Item 029 RSS Certificate of Destruction Example
Item 033 Shred-It - Sample Certificate of Destruction
Item 034 Guidance Secure destruction of confidential information or confidential waste
Item 035 Screen shot of RM8 showing destroyed records
Item 036 Certificate of Compliance Alford Academy 2013
Item 037 Certificate of Compliance Crombie School 2013
Item 038 Back up Arrangements Report 2014
Item 039 Report on Oldest Files from a Shared Drive 2015

Future Developments

Standards of records destruction arrangements in line with the provisions of the PRSA will be built into contracts and agreements with third parties who handle or process records on the Council's behalf and will be included in the Improvement Plan.

Assessment and Review

This element will be reviewed annually by the Records Management Group, or whatever body replaces this group in any new Governance Structure, or as required following any incident.

Responsible Officer(s)

Team Leader (Facilities Management)

Element 7: Archiving and transfer arrangements

Introduction

This element is compulsory. Section 1(2)(b)(iii) of the Act requires an RMP to make provision about the archiving of the council's public records.

The RMP must detail the Council's archiving and transfer arrangements and ensure that records of historical value are deposited in an appropriate archive repository. The RMP will detail how custody of the records will transfer from the operational side of the authority to either an in-house archive, if that facility exists, or another suitable repository, which must be named. The person responsible for the archive should also be cited.

Statement of Compliance

The Archive Service for Aberdeenshire Council and Licensing Boards has been provided by Aberdeen City Council since 1997 and is funded by Aberdeenshire Council. A senior archivist and archiving assistants look after and make accessible to the public and staff of Aberdeenshire Council archives from Old Aberdeen House, Dunbar Street, Aberdeen.

An annual development plan is written and worked on throughout the year. A current plan for 2015/2016 is currently being worked on and will be finalised in the coming months. This will take into account much of the improvement areas identified from the final submission of the RMP. Regular meetings take place between the Senior Archivist and the Information Management Project Co-ordinator to review progress of the plan and monitor spend. Statistical information is provided on the various aspects of the Archive Service.

A procedure is in place for staff to transfer or access documents from the Archive Service.

During physical clearouts of identified storage areas and offices, the Senior Archivist is contacted to review records identified as presenting potential historical interest. Selected records are then transferred to the Archive Service.

A formal Collaboration Agreement has recently been finalised, detailing each aspect of the services provided and serving as a basis for the cost.

Evidence of Compliance

Primary evidence submitted in support of this element:

Item 040 Transfer of Records to be Archived Procedure

Item 041 Example of Banff and Buchan Records Transfer Note

Item 042 Archive Services Collaboration Agreement (Aberdeen city and Shire)

Supporting Evidence Submitted:

Item 043 Aberdeenshire Archive Development Plan 2013-2014

Item 044 Archive Service Annual Report 2014-2015

Future Developments

As part of the Development Plan for the archive service, work has started by the Archive Service on a digital preservation strategy so that electronic documents can be transferred to the Service. The Senior Archivist has discussed requirements with relevant staff of National Records of Scotland and with Aberdeen City Council ICT Staff.

Assessment and Review

Quarterly meetings between the Information Management Project Co-ordinator and the Senior Archivist takes place to review progress on the development plan. Any resulting actions from these meetings are agreed. Furthermore, yearly statistics on the archive service activities are compiled and published on the Councils intranet.

Responsible Officer

Information Management Project Co-ordinator

Element 8: Information security

Introduction

Element 8 is compulsory and covers Information Security. The 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

Aberdeenshire Council has an Information Security Policy which has been approved by the Chief Executive of the Council. All staff are required to comply with the Policy which is supported by a comprehensive set of complementary Policies, Codes of Practice and Guidance Documents. The Council has a Principal Information Security Officer who is responsible for both Information Security and Data Protection. The Information Security Management Group has representation from all Council Services and is chaired by a Head of Service.

Storage of paper records

Current paper records are stored close to staff requiring access to them in dedicated storage equipment in offices, such as filing cabinets, filing rooms, mobile racking and tambour cabinets. Some centralised filing systems have file trackers to monitor who has taken a file out of the cabinets.

Non-current records which require to be retained for more than two years and for which retrieval is infrequent, are stored at a third party off-site storage provider. In January 2013, after a competitive tender process, a third party off-site storage provider, Removal Storage Scotland Ltd (RSS), based in Livingston, was appointed to provide managed and secure storage facilities for these paper records.

In parallel with this, a supplier of durable boxes that comply with Health and Safety legislation for manual handling, was appointed (Leiper Packaging Ltd).

Procedures have been developed on preparing, packing and identifying records for storage and also covering related processes such as bar coding. Each box is barcoded and catalogued which allows there to be no information relating to content visible on the outside of the box. Each box is entered on a deposit schedule which includes a field for a destruction date. After packing and cataloguing their records, Services request RSS to collect boxes. RSS then delivers and stores records in their secure facility in Livingstone for as long as required as per the destruction date provided. When the destruction date is reached, RSS informs the relevant Service to obtain authorisation to securely destroy the contents of the box.

On request from Services, RSS delivers boxes or individual files to Services (retrievals) according to an agreed timescale.

The cataloguing database in RSS is updated each time there is a movement of a box from collection, to retrieval to destruction.

Evidence of Compliance

Primary evidence submitted in support of Element 8:

Item 045 Information Security Policy (10/2012)

Item 046 Acceptable Use Policy (10-2012)

Item 047 Acceptable Use Policy (Public Access)

Item 048 Social Media Policy (11-2013)

Item 049 Social Media Procedure (11-2012)

Item 050 ICT Asset Management Policy (03-2013)

Item 051 Tender Response from RSS Offsite Storage

Item 052 Preparing, Packing and identifying records for storage procedures

Supporting evidence submitted:

Codes of Practice

Item 053 Acceptable Use of ICT Facilities by Employees (02-2013)

Item 054 Acceptable Use of ICT Facilities by Elected Members (02-2013)

Item 055 Acceptable Use of ICT Facilities by School Pupils (12-2007)

Item 056 Closed-Circuit Television [CCTV] Code of Practice (12/2010)

Item 057 Organisation of Information Security (03-2011)

Item 058 Remote Working (09-2010)

Future Developments

Onsite storage of paper records

It is planned to store non-current paper records, which require to be retained for less than two years and for which retrieval is frequent, in a secure storage room already identified in Council Headquarters, Woodhill House. An Information Management and Records Storage Assistant was appointed and started in January 2014 who is charged with implementing all processes and procedures for the facility to be operational.

Other locations used for storing paper records have been identified and require to be cleared out. This is done in conjunction with WorkSpace programme.

Assessment and Review

Reviews and assessments of policies and other documents are instigated by the Information Security Management Group (ISMG), or whichever body replaces it in the new Governance Structure, and actioned by the Principal Information Security Officer.

Regular meetings take place with service representative and RSS account manager to discuss and solve issues arising with offsite storage processes.

Responsible Officers

Principal Information Security Officer

Chair of Information Security Management Group

Element 9: Data protection

Introduction

The Keeper expects the Council to provide evidence of compliance with data protection responsibilities for the management of all relevant personal data.

Statement of Compliance

In order to deliver services to the various communities in Aberdeenshire, the gathering and processing of personal data about residents, staff and other individuals are necessary. Aberdeenshire 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 and sensitive personal data as defined in the Act. The Council's Data Protection Policy is a statement of public responsibility and demonstrates the organisation's commitment to compliance with the Act and the safeguarding and fair processing of all personal data held. The supporting code of practice has been drawn up to ensure the Council complies with the legislation by following organisation wide policies and procedures for the management of information created or received by it in the course of its business transactions. Data Protection functions within the Council are coordinated through Business Services. The Council is listed within the Data Protection Register held by the Information Commissioner's Office. A comprehensive online training and awareness programme is provided to all staff in order to ensure that they are aware of their responsibilities in managing, processing and protecting personal data. During 2013, this training was made mandatory for all staff who process personal data. The training is via an on-line course with a mandatory exam.

RM8 affords a tight security of documents and records whenever this is required:

Security levels as defined in the Information Asset Classification Code of Practice are systematically applied to documents and records saved in RM8 (not protectively marked, protected, confidential).

Security caveats are also applied whenever greater security on the records is required. For example Social Work Clients files have a security level of Confidential with security caveat ranging from MAPPA Records, Prisoner Records, Criminal Justice Records, Social Care Records, Antisocial Behaviour Case work and Affordable Housing Records.

Permissions on actions on records are applied (View Document, View metadata, update document, update record metadata, modify record access, destroy records and contribute contents).

Each RM8 user has their security profile defined giving them access only to documents and records required for their work as well as those which are marked "not protectively marked". A RM8 user profile comprises user type, security level and security caveat

Evidence of Compliance

Aberdeenshire Council's registration number in the Data Protection Register is Z6501842. This registration includes "Licensing and Regulatory activities" and thus incorporates the activities of the Licensing Boards.

Primary evidence submitted in support of Element 9:
Item 059 Data Protection Policy Statement
Item 059A Clarification on ICO Registration
Item 060 Data Protection Code of Practice
Item 056 Closed-Circuit Television [CCTV] Code of Practice (12/2010)
Item 061 Screenshot of Data Protection Online Staff Training

Supporting evidence submitted:

Item 062 Advice on Subject Access Requests
Item 063 Access to Pupil Educational Records 20.11.03
Item 064 Data Protection Breach Management Analysis Template
Item 065 Duty of Confidentiality
Item 066 Confidentiality Agreement (Non Employees)
Item 067 Confidentiality Agreement for use within Contracts
Item 068 Screen shot of RM8 showing Record Types with Security Levels
Item 069 Screen shot of RM8 showing user profile with security levels
Item 070 Guidance on use of USB Flash Drives (Memory Stick) 2014
Item 071 Evidence of DPA Training Stats

Future Developments

The programme will be monitored by the Information Security Management Group, or whichever body replaces this Group in any new Governance Structure, with feedback provided to Services regarding uptake. It is planned to enhance the content of the online training as required to take into account the introduction of the European Data Protection Directive.

Assessment and Review

The policies and codes of practice will be reviewed as stipulated by the Information Security Management Group, or whichever body replaces this group in the new Governance Structure, ensuring they remain accurate and up to date. The Data Protection register entry will be renewed in 2014 and regularly monitored and updated as necessary.

Responsible Officers

Principal Information Security Officer
Chair Information Security Management Group

Element 10: Business continuity and vital records

Introduction

The Keeper expects the council's RMP to indicate arrangements in support of records vital to business continuity. Certain records held by local authorities are vital to their function. These might include insurance details, current contract information, master personnel files, case files, etc. The RMP will support reasonable procedures for these records to be accessible in the event of an emergency affecting their premises or systems.

The Council should therefore have appropriate Business Continuity Plans (BCPs) ensuring that the critical business activities referred to in their vital records will be able to continue in the event of a disaster. How each authority does this is for them to determine in light of their business needs, but the plan should point to it.

Statement of Compliance

The Council has a number of BCPs and procedures in place which are reviewed regularly and updated as required. Each Service is responsible for carrying out a Business Impact Assessment and producing its own BCP. The BIA process identifies the Critical Activities of each service and identifies the documents and records which are vital to ensure service delivery. The completed BIA Analysis is signed off by the relevant Director prior to the BCP being finalised.

A Plan Monitoring process, managed by the Risk Manager, is in place to ensure that all BCPs are regularly tested, reviewed and updated. In addition the BIAs and BCPs are subject to periodic review. Completion of Testing and Documentation Reviews requires to be confirmed by both the Plan Author and Plan Owner (the relevant Director). Plan monitoring status is reported to the Council's Strategic Leadership Team (quarterly), the Council's Policy & Resources Committee (6 monthly) and the Council's Scrutiny & Audit Committee (annually). In addition Plan Monitoring is a standing agenda item at the quarterly Corporate Risk Management Steering Group.

Evidence of Compliance

Primary evidence submitted in support of this element:

- Item 072 Business Continuity Policy and Procedures
- Item 073 Human Resources & Organisational Development & Payroll BCP
- Item 074 List of BCP owners in Services
- Item 075 Human Resources & Organisational Development & Payroll BIA 2015
- Item 076a BCP Test Check 1 2015
- Item 076b BCP Test Check 2 2015
- Item 076c BCP Test Check 3 2015
- Item 076d BCP Test Check 4 2015
- Item 077 BCP Documentation Review
- Item 078 BIA Documentation Review
- Item 079 Plan Monitoring 2014

Future Development

The identification of vital records in new business systems being implemented across the Council and existing Business Systems including RM8 will be progressed. ICT is at present running a project to review their Disaster Recovery Plan and their procedures for the maintenance and destruction of backup tapes.

Assessment and Review

BCPs are subject to regular review through the Council's Risk Manager. Within the new Governance Structure, there will be a specific Group, of which the Risk Manager will be a member, which will be responsible for the review and audit of the BCPs

Responsible Officer

Risk Manager

Element 11: Audit trail

Introduction

The Keeper expects the council's RMP to provide evidence that the authority maintains a complete and accurate representation of all changes that occur in relation to any particular record and requires evidence that an authority can locate its records and can confidently declare these records to be true and authentic.

Statement of Compliance

RM8 has a comprehensive audit trail for each action taken on the records. From creation to destruction, it is possible to follow the activity on the records such as, but not limited to, who has created the document and when, who has viewed the document and when, who has edited it, when and on which computer, if the document was sent by mail and by whom, who closed folders and when, who has destroyed records and when.

Movements of records stored in the offsite facility are fully traceable with a record of when such records were received, when they were stored, who has requested a retrieval and when, return of records, and destruction. Some Business areas use bespoke systems for tracking and audit of paper records. As examples, Tracer files are in use in Housing and Social work and File Manager is used in Legal and Governance.

Most Business Systems have audit trail facilities which are activated and utilised, some have audit facilities which are not utilised. This is now recognised and steps are being taken to rectify.

However, there are no audit facilities for information held on shared drives. But there are procedures in place that govern version control within the Council and Licensing Boards when records are being created, amended or updated. A fuller procedure and guidance will be investigated when the Business Classification Scheme is complete and through the full implementation of an EDRMS. A review of the options for this is ongoing with a long term aim for this to replace shared drives for electronic storage

Evidence of Compliance

Item 080 List of elements being audited in RM8

Item 081 Example of document Audit Trail in RM8

Future Developments

Implementation of on-site storage facility at Woodhill House will allow for similar audit trail functionality as per the off-site storage facility. Work will continue to identify the Business Systems that incorporate an audit trail facility and ensure that this function is activated and utilised

MS SharePoint has a robust audit facility and version control facility which will be enabled and utilised. The new Governance arrangements will be applied to

all information held on SharePoint and electronic records transferred to HP RM8.

The implementation of MS SharePoint and the eventual move of shared drives to this platform, combined with new Governance arrangements will enable the council to fully comply with this element of the Keeper's requirements.

Assessment and Review

None

Responsible Officer

Nicola Graham, Head of ICT

Element 12: Competency framework for records management staff

Introduction

The Keeper expects the council's RMP to detail a competency framework for person(s) designated as responsible for the day-to-day operation of activities described in the elements in the authority's RMP. It is important that authorities understand that records management is best implemented by a person or persons possessing the relevant skills.

A competency framework outlining what the authority considers are the vital skills and experiences needed to carry out the task is an important part of any records management system.

Statement of Compliance

The Council recognises that records management is an entirely separate function from general office duties and acknowledges the importance of records management. Senior management recognise the importance of the continued development of staff with Records Management responsibilities within services and is open to staff attending regular seminars and conferences for continuing professional development as well as getting up to date with industry best practices. This is mainly achieved by staff attending various conferences organised by the Information and Records Management Society (IRMS) amongst other.

Aberdeenshire Council has a Corporate Training for Records Management available on the Councils learning and development site (ALDO) which outlines various aspects of dealing with records from creation to destruction. The training is designed to ensure that development is seen as a continuous process which is jointly owned by managers and employees and is linked to Council priorities. The Council also has an annual review form completed by employees called the Employee Annual Review (EAR) which outlines training and development opportunities for staff resulting in every employee having a Personal Development Plan which details what they will do to contribute to service delivery.

The officer named under element 2 attends regular events for continuous professional development. E.g. is training with IG Consultant or events organised by IRMS or National Records for Scotland (NRS).

Training for RM8 users must be completed before getting access to RM8. The end-user training is delivered by the Employee Development Team and specifically for the Housing & Social Work users by the Records Management Assistant.

RM8 Power Users and System Administrators undertake an extended training which highlights their specific role and responsibilities. RM8 Refresher Training is organised at regular intervals throughout the year and is delivered by the Information and Records Management Assistant.

Evidence of Compliance

Primary Evidence

Item 007 Information Management Project Co-ordinator Job Profile
Item 082 Information Management Project Co-ordinator EAR Objectives
Item 083 ICRM Officer ELL job description
Item 084 Job profile for Information and Records Storage Assistant
Item 085 Records Management Training Screenshot 1
Item 086 Records Management Training Screenshot 2
Item 087 Records Management Training Screenshot 3
Item 088 Records Management Training Screenshot 4
Corporate Membership of IRMS number 4289

Future Developments

Some Services within the Council have a nominated staff member with responsibility for information and records management within their respective service. There is a potential to extend and enhance these roles and this will be considered in the information management review throughout the Council in a way that is both sustainable and cost effective. After this is done, a formal training and development scheme will be considered for the roles created.

Assessment and Review

The Records Management Group will regularly review the requirements for information management training once all required staff are in place. All staff with an information management requirement within their EAR will be reviewed at their annual assessment as well.

RM8 end-user training will be reviewed to include more records management elements and a better explanation of the system pending the time it integrates with SharePoint or otherwise. Responsibility for delivering this training will also be reviewed.

Responsible Officer

ICT Service Development Manager

Element 13: Assessment and review

Introduction

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. Section 1(5)(i)(a) of the Act says that an authority must keep its RMP under review and the council's RMP must describe the procedures in place to regularly review it in the future.

A statement to support the Authority's commitment to keep its RMP under review must appear in the RMP detailing how it will accomplish this task.

Statement of Compliance

Aberdeenshire Council will review the Plan regularly to ensure that the provisions contained in it remains fit for purpose. The format for assessing and reviewing the Plan will be determined by the Records Management Group. Review will be led by the Chair of the Records Management Group at the time.

An Improvement Plan has been attached to this document and it will help in the review of the relevance of the Plan. Services will be required to indicate the percentage they have achieved for each aspect of the Improvement Plan and this will equally be monitored by the Records Management Group. This information will be provided to the various Heads of Service within the Council for monitoring purposes.

Assistance will be offered to Services where records management advice is required.

As part of the Internal Audit Schedule, internal audits on Freedom of Information process, Data Protection and on the functional aspects of RM8 were carried out in 2013 with reporting to relevant Heads of Services and Policy & Resources Committee.

Evidence of Compliance

Primary Evidence

Item 089 Internal Audit Plan 2012 - 2015

Item 090 Internal Audit Plan 2013 - 2016

Future Developments

A self assessment on compliance with PRSA, both corporately and for Services is to be developed and put in place with appropriate responsibilities and reporting. Internal Audit Service will be notified when major issues with compliance are found.

The Records Management Group is taking on the responsibility of monitoring the development of the RMP, compliance with the Improvement Plan and direct the Council's practices.

Assessment and Review

The assessment and Review process will be agreed and then reviewed by the appropriate body on a yearly basis.

Responsible Officer

Nicola Graham, Head of Service, ICT

Element 14: Shared Information

Introduction

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.

Protocols for the routine sharing of information with external partner organisations are considered important, but not a legal requirement, for ensuring data protection, information security and record keeping compliance. Where protocols are utilised they should include guidance as to what information can be shared under what circumstances, who should retain the data, how the data will be shared securely, who should have access within respective organisations and what the disposal arrangements are.

The Keeper expects an authority's RMP to reflect its procedures for sharing information

Statement of Compliance

An over-arching Memorandum of Understanding (MOU) is already in place between key partner organisations, covering the legal aspects of information sharing. The MOU is however currently being reviewed and any updates will be issued in effect. Individual Information Sharing Protocols are developed to cover the specifics of information sharing for any identified purpose. These individual ISPs are underpinned by the above-mentioned MOU. Specific guidance for practitioners has also been produced. For any routine information sharing with external organisations which are not party to the MOU, separate stand-alone Information Sharing Protocols are developed.

Evidence of Compliance

Primary evidence submitted in support of Element 14:

Item 091 Grampian Data Sharing Partnership Information Sharing MOU

Item 092 Grampian Data Sharing Partnership Guidance for Practitioners on Information Sharing

Item 093 Data Sharing Code of Practice (02/2014)

Supporting evidence submitted:

Item 094 Adults at Risk of Harm ISP (Dec 2012)

Item 095 Information Sharing Agreement Mental Welfare Commission for Scotland

Future Developments

Work is currently underway to review and revise the Memorandum of Understanding, including e.g. to reflect the recent organisational change from Grampian Police to Police Scotland. This work is being undertaken by an Information Sharing Group established specifically to look at Information Sharing for the purpose of Health and Social Care Integration.

Where there is a future requirement for routine information sharing with external organisation(s), consideration will be given to developing an appropriate Information Sharing Protocol.

Assessment and Review

ISP's are owned by Services and regular reviewing of all new ISPs to ensure they are fit for purpose from an Information Management and Data Protection viewpoint will be done.

Responsible Officer

Principal Information Security Officer

ANNEX A: EVIDENCE SUBMITTED

Please find a list of evidence 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:	In support of Element (s):
001	Statement from Chief Executive 2015	1
002	Statement from Senior Accountable Officer 2015	1,2
003	Information and Records Management Strategy 2013	1,3
004	Information and Records Management Policy 2013	1,3,6
005	Information and Records Management Policy Cover Report to Policy and Resources Committee 2013	1,3
006	Statement from Information Management Project Co-ordinator	2
007	Information Management Project Co-ordinator Job Profile	2,12
008	'Innovate Aberdeenshire' Digital Strategy 2015 – 2020	3
009	ICT Business Plan 2013 – 2016	3
010	Business Systems List 2015	3
011	Extract of the Minutes of the P&R Committee meeting approving the Policy	3
012	Information and Records Management Policy Report to South, Central and North Licensing Boards	3
013	Extract of the Minutes of the Central Licensing Board meeting approving the Policy	3
014	Extract of the Minutes of the North Licensing Board meeting approving the Policy	3
015	Extract of the Minutes of the South Licensing Board meeting approving the Policy	3
016	Screen Shot from Arcadia showing File Plan classes	4

Evidence Item ref no:	Details:	In support of Element (s):
017	Local Government Classification Scheme	4
018	File Plan Appointed main classifications	4
019	Screen Shot of RM8 showing 22 classes	4
021	Infrastructure Services Retention and Disposal Schedule	5
022	HR&OD Retention and Disposal Schedule Draft	5
023	Finance Retention and Disposal Schedule	5
024	Criminal Justice Retention and Disposal Schedule	5
025	Housing Retention and Disposal Schedule	5
026	Adult Services Retention and Disposal Schedule	5
027	Screenshot from RM8 of records closed and retention triggered	5
028	Minutes of ICT Steering Group regarding retention of legacy e messages (30.10.2013)	5
029	RSS Certificate of Destruction Example	6
030	Shred-It response Attachment	6
031	Signed Letter of Acceptance of Tender	6
032	Terms and Conditions Confidential Waste	6
033	Shred-It - Sample Certificate of Destruction	6
034	Guidance Secure destruction of confidential information or confidential waste	6
035	Screen shot of RM8 showing destroyed records	6
036	Certificate of Compliance Alford Academy 2013	6
037	Certificate of Compliance Crombie School 2013	6
038	Back up Arrangements Report 2014	6
039	Report on Oldest Files from a Shared Drive 2015	6

Evidence Item ref no:	Details:	In support of Element (s):
040	Transfer of Records to be Archived Procedure	7
041	Example of Banff and Buchan Records Transfer Note	7
042	Archive Services Collaboration Agreement (Aberdeen city and Shire)	7
043	Aberdeenshire Archive Development Plan 2013-2014	7
044	Archive Service Annual Report 2014-2015	7
045	Information Security Policy (10/2012)	8
046	Acceptable Use Policy (10-2012)	8
047	Acceptable Use Policy (Public Access)	8
048	Social Media Policy (11-2013)	8
049	Social Media Procedure (11-2012)	8
050	ICT Asset Management Policy (03-2013)	8
051	Tender Response from RSS Offsite Storage	8
052	Preparing, Packing and identifying records for storage procedures	8
053	Acceptable Use of ICT Facilities by Employees (02-2013)	8
054	Acceptable Use of ICT Facilities by Elected Members (02-2013)	8
055	Acceptable Use of ICT Facilities by School Pupils (12-2007)	8
056	Closed-Circuit Television [CCTV] Code of Practice (12/2010)	8,9
057	Organisation of Information Security (03-2011)	8
058	Remote Working (09-2010)	8
059	Data Protection Policy Statement	9
059A	Clarification on ICO Registration	9
060	Data Protection Code of Practice	9
061	Screenshot of Data Protection Online Staff Training	9

Evidence Item ref no:	Details:	In support of Element (s):
062	Advice on Subject Access Requests	9
063	Access to Pupil Educational Records 20.11.03	9
064	Data Protection Breach Management Analysis Template	9
065	Duty of Confidentiality	9
066	Confidentiality Agreement (Non Employees)	9
067	Confidentiality Agreement for use within Contracts	9
068	Screen shot of RM8 showing Record Types with Security Levels	9
069	Screen shot of RM8 showing user profile with security levels	9
070	Guidance on use of USB Flash Drives (Memory Stick) 2014	9
071	Evidence of DPA Training Stats	9
072	Business Continuity Policy and Procedures	10
073	Human Resources & Organisational Development & Payroll BCP	10
074	List of BCP owners in Services	10
075	Human Resources & Organisational Development & Payroll BIA 2015	10
076a	BCP Test Check 1 2015	10
076b	BCP Test Check 2 2015	10
076c	BCP Test Check 3 2015	10
076d	BCP Test Check 4 2015	10
077	BCP Documentation Review	10
078	BIA Documentation Review	10
079	Plan Monitoring 2014	10
080	List of elements being audited in RM8	11
081	Example of document Audit Trail in RM8	11

Evidence Item ref no:	Details:	In support of Element (s):
082	Information Management Project Co-ordinator EAR Objectives	12
083	ICRM Officer ELL job description	12
084	Job profile for Information and Records Storage Assistant	12
085	Records Management Training Screenshot 1	12
086	Records Management Training Screenshot 2	12
087	Records Management Training Screenshot 3	12
088	Records Management Training Screenshot 4	12
089	Internal Audit Plan 2012 - 2015	13
090	Internal Audit Plan 2013 - 2016	13
091	Grampian Data Sharing Partnership Information Sharing MOU	14
092	Grampian Data Sharing Partnership Guidance for Practitioners on Information Sharing	14
093	Data Sharing Code of Practice (02/2014)	14
094	Adults at Risk of Harm ISP (Dec 2012)	14
095	Information Sharing Agreement Mental Welfare Commission for Scotland	14

ANNEX B: IMPROVEMENT PLAN

ANNEX B - IMPROVEMENT PLAN