



Argyll and Bute Council

Records Management Plan

Developing Records Management Arrangements Under Section 1 of the Public Records (Scotland) Act 2011

Document Control

Name of Document: Argyll and Bute Council – Records Management Plan
Author: Iain Jackson, Governance, Risk and Safety Manager
Description: Records Management Plan
Status: Version: 0.1

Revision History

Version	Date	Summary of Changes	Author

Note: The Keeper must be notified of any revisions to this document

Approvals

Approved by	Date	Version
<u>Policy & Resources Committee</u>		

Note: Once approved, a review must be scheduled for one year – PUR update

Distribution

Distribution	Date of Issue	Version
<u>National Records of Scotland</u>	<u>28/02/26</u>	
<u>All Council staff (via The Hub)</u>		

Introduction

Argyll and Bute Council creates, collects, uses and disposes of a large amount of information during the course of carrying out its public duties. Managing this information carefully will ensure that the record of its activities is accurate and complete.

Under the Public Records (Scotland) Act 2011 (PRSA), Scottish public authorities are required to produce a records management plan, which sets out the arrangements for managing public records. The Council's records management plan has been developed in line with the Model Records Management Plan provided by the Keeper of the Records of Scotland.

It is anticipated that the records management plan will help deliver the following benefits:

- Increase efficiency and effectiveness
- Deliver savings in administration costs
- Improve and develop service delivery
- Ensure compliance with the Public Records (Scotland) Act 2011
- Support transparency and open government.

Strategic Context and RM/IM Progress Since 2017

Since the approval of its original Records Management Plan (RMP) in 2017, Argyll and Bute Council has continued to develop and strengthen its records and information governance arrangements. While initial progress was made in a number of areas, such as information asset registers, policy development, and planning for an EDRMS, further implementation was not able to be progressed effectively during the period of COVID-19 due to a number of factors.

Despite these challenges, the Council maintained momentum where possible, notably through improvements in Human Resources and Organisational Development (HROD) information governance and has now made significant strides forward.

Recent progress includes:

- A full review and refresh of the Information Management Strategy.
- Ongoing refinement of the Information Governance Framework, including updated and new policies and guidance.
- A focus on practical implementation using the Microsoft 365 environment, particularly SharePoint and Purview, to automate and embed records management practices.
- Improvements to the Council's information asset registers, aligned with the Business Classification Scheme (BCS) and Retention and Disposal Schedule (RRS).

Strategically, this work demonstrates a continuity of direction from the 2017 RMP to this current version. Many core principles remain the same, with updated roles, terminology, and governance structures reflecting the Council's maturing approach.

A major improvement decision since 2017 has been the commitment to implement an Electronic Document and Records Management (EDRM) solution using SharePoint. This will include the planned migration of relevant active files and in-scope records from network shared drives and other unstructured storage locations as well as the Council's existing on-premise SharePoint solution.

Key strategic improvement work has included the development and approval of the Council's "Approach to Information Management" (evidence ref no. 24), and the detailed records management and information governance requirements for the SharePoint EDRM solution. These have formed the foundation for a more structured, sustainable implementation.

In June 2025, the Council formally approved a business case and allocated budget for full implementation of the RMP and Information Management Strategy within the Microsoft 365 environment. This includes the planning, design, and configuration of the EDRM solution in SharePoint, supported by the procurement of external IM and M365/SharePoint expertise. Additional internal resources have also been approved, including a dedicated project manager and potential records management administrative support.

Early adopter work in specific directorates and within HROD has already begun, providing a foundation for a broader roll-out and embedding of improved practices. This forward momentum signals a clear strategic commitment to continuous improvement and a modern, integrated approach to records and information governance.

2. ELEMENTS OF THE PLAN

There are 15 elements within the model records management plan.

1. [Senior Management responsibility](#)
2. [Records manager responsibility](#)
3. [Records management policy statement](#)
4. [Business classification](#)
5. [Retention periods](#)
6. [Destruction arrangements](#)
7. [Archiving and transfer arrangements](#)
8. [Information security](#)
9. [Data protection](#)
10. [Business continuity and vital records](#)
11. [Audit trail](#)

12. [Records management training for staff](#)
13. [Assessment and review](#)
14. [Shared information](#)
15. [Public records created or held by third parties](#)

Structure of each RMP Element

Each element in this Records Management Plan follows a consistent structure, designed to clearly explain how Argyll and Bute Council meets the Keeper's requirements under the Public Records (Scotland) Act 2011:

1. **Element Title**
The name of the element as defined in the Keeper's Model Records Management Plan.
2. **RMP Requirement**
A brief summary of what the Keeper expects organisations to demonstrate for this element.
3. **Statement of Compliance**
A narrative explanation of how Argyll and Bute Council address this requirement, including current practice and any relevant roles or responsibilities.
4. **Compliance Improvement Action**
Summary of planned next actions to strengthen compliance and improve practice, with more detail set out in the Information Management Development Plan.
5. **Evidence**
A list of documents, tools, or artefacts that demonstrate compliance with this element. This includes policy documents, procedures, templates, records, committee remits, and relevant examples of implementation.

Argyll and Bute Council's Records Management Plan (RMP) is not a standalone compliance document. It forms a core part of the Council's wider Information Management Strategy (evidence ref no. 6), which sets the strategic direction for how information is governed, used, and protected across the organisation, and is referred to throughout this Records Management Plan.

The RMP provides the operational detail and evidential basis for how the Council meets its statutory obligations under the Public Records (Scotland) Act 2011. In turn, the Information Management Strategy sets out the overarching governance and improvement framework that supports the Council's ability to deliver, maintain, and enhance records management practices.

This alignment ensures that records management is embedded within broader organisational goals such as service improvement, digital transformation, data protection, and transparency. It also enables a culture of continuous improvement,

where the RMP is not only a record of compliance, but a tool for assessing maturity and planning future development.

All compliance improvement actions documented in the RMP are detailed in full in our Information Management Development Plan (evidence reference no. 5), another key part of our information governance and improvement framework.

Element 1: Senior management responsibility

An individual senior staff member is identified as holding corporate responsibility for records management

Statement of compliance

The Senior Manager with overall responsibility for records management within Argyll and Bute Council is Douglas Hendry, Executive Director who is also the Senior Information Risk Officer (SIRO) and Monitoring Officer for the organisation.

Name: Douglas Hendry

Job Title: Executive Director, Argyll and Bute Council

Contact address: Argyll & Bute Council, Kilmory, Lochgilphead, Argyll, PA31 8RT

Contact number: 01546 604244

The Executive Director is a member of the Senior Leadership Team, reports to the Chief Executive and is supported by the Governance, Risk and Safety Manager. Senior management responsibility is recorded in this records management plan and in Argyll and Bute Council's Records Management Policy.

The Senior Manager with overall responsibility for records management within the Argyll and Bute Licensing Board is the Clerk to the Licensing Board, David Logan

Name: David Logan

Job Title: Clerk to Argyll and Bute Council Licensing Board

Contact address: Argyll & Bute Council, Kilmory, Lochgilphead, Argyll, PA31 8RT

Contact number: 01546 604192

Compliance Improvement Action

No further work is required for compliance with this element of the Plan. The Keeper will be promptly advised of any change in the post-holder.

Responsible officer(s)

Douglas Hendry, Executive Director

David Logan, Clerk to Argyll and Bute Council Licensing Board

Evidence of compliance

Ref No.	Title
1	Letter from the Executive Director
2	Protocol for the Office of the Monitoring Officer
3	Letter from the Clerk to the Licensing Board
4	Policy & Resources Committee Minute Extract
5	Information Management Development Plan
6	Argyll & Bute Council Information Management Strategy 2025-2029

Element 2: Records manager responsibility

An individual staff member is identified as holding operational responsibility for records management and has appropriate corporate responsibility, access to resources and skills.

Statement of compliance

The day-to-day operational responsibility for records management within Argyll and Bute Council lies with Iain Jackson, Governance, Risk and Safety Manager. The Governance, Risk and Safety Manager is a member of the Information Management Project Board and the Information and Records Management Society (IRMS) and is the Keeper's main point of contact for records management issues.

The Council is committed to providing the Governance, Risk and Safety Manager with access to adequate skills and resources to enable him to fulfil his records management responsibilities which are recorded in the Records Management Policy and covered in the Council's Records and Information Management Competency and Training Framework - see Element 12.

The Governance, Risk and Safety Manager is supported by the Compliance & Regulatory Officer who is also a member of IRMS and the Information Management Project Board.

Due to various structure and staffing changes across the Council the previous Information Management Group is no longer operational and during this period of transition the information management project board will be responsible for Records Management compliance. The roll-out of the M365 project will have an Information Management Steering Group and Information Management Working Group containing representatives from across all Council Services who will take forward this responsibility going forward. The Information Management Project Board is chaired by David Logan, Head of Legal and Regulatory Support.

Name: Iain Jackson

Job Title: Governance, Risk and Safety Manager

Department: Legal and Regulatory Support

Contact address: Argyll & Bute Council, Kilmory, Lochgilphead, Argyll, PA31 8RT

Contact number: 01546 604188

Compliance Improvement Action

Formation of the Information Management Steering Group and Information Management Working Group containing representatives from across all Council Services who will take forward this records management responsibility going forward. The Keeper will be promptly advised of any change in post-holder.

Responsible officer(s)

Douglas Hendry, Executive Director of Customer Services

Evidence of compliance

Ref No.	Title
1	Letter from the Executive Director
4	Policy & Resources Committee Minute Extract
5	Information Management Development Plan
6	Argyll & Bute Council Information Management Strategy 2026-2029
7	Governance, Risk & Safety Manager Job Description
8	Training Attendance

Element 3: Records management policy statement

The authority has an appropriate policy statement on records management.

Statement of compliance

The Council's Records Management Policy sets out how the council manages its records in accordance with its Records Management Plan and includes the principles of good record keeping, the legislative and regulatory context, and the expectations of staff. This policy is aligned with the Information Management Strategy 2026–2029, which identifies information as a critical corporate asset and emphasises openness, accountability, and lifecycle management.

These are key parts of the council's information governance policy framework which also includes a range of other policies, procedures, guidance and tools accessible to staff on the Council's intranet, the Hub. The Council has recently approved a new Artificial Intelligence (AI) Policy alongside the Managing and Archiving Email and Messages Policy to cover other communication and collaboration channels, particularly Microsoft Teams and Chat, so staff are clear when each tool should, and should not, be used. The Records Management Policy will be subject to review every two years as a minimum, with any required changes or updates recommended by the *Governance, Risk & Safety* Manager for review and final approval by the *Policy & Resources Committee*

Compliance Improvement Action

Associated policies, procedures and guidance will be developed, updated and/or streamlined to reflect new ways of working with the implementation of the EDRM solution in SharePoint and wider M365 platform.

For more detail, see the Information Management Development Plan.

Responsible officer(s)

Douglas Hendry, Executive Director
Iain Jackson, Governance, Risk and Safety Manager

Evidence of compliance

Ref No.	Title
4	Policy & Resources Committee Minute Extract
5	Information Management Development Plan
6	Argyll & Bute Council Information Management Strategy 2026-2029
9	Managing and Archiving Email and Messages Policy
10	Artificial Intelligence Policy
11	M365 Information Governance Check – Approval Request Form

12	Records Management & Access to Information Intranet Screenshot
13	MS Teams Guidance
14	MS Forms Guidance
15	OneDrive Guidance
16	OneNote Guidance
17	Setting up Meetings involving Customers/Clients Guidance
18	Setting up Meetings involving Customers/Clients using Shared
Calendars	
19	MS Teams – New Site Request screenshot
20	IAR Implementation Guidance
21	Original IAR – Legal & Regulatory Support
22	Simplified IAR example – Legal & Regulatory Support
23	ICT Acceptable Use Policy
24	Information Management Approach
25	Managing Records & Information intranet guidance
26	IM Project Brief
27	PRSA M365 Guidance – Requirements Checklist
28	Records Management Guidance
29	Records Management Policy

Element 4: Business classification

Records are known and are identified within a structure, ideally founded on function.

Statement of compliance

The Council's Business Classification Scheme is based on the Local Government Classification Scheme and provides a structured and function-based approach to classification, ensuring that records can be consistently stored, retrieved, and managed across services and business systems. The business classification scheme underpins the development of the Information Asset Registers (IARs), which are used to capture where records are held, their sensitivity, and applicable retention rules. The scheme is recognised within the M365 Information Management Approach as essential for building a sustainable information architecture.

The BCS underpins the design, configuration and implementation of information architecture, metadata, keywords and naming conventions within M365 and other key council business systems and information repositories.

Early adopter areas have been implementing the BCS on network drives by developing file plans based on the BCS, building the new folder structure and relocating required existing documents required for current working and longer-term retention to the relevant area of the new structure. This is both an end in itself as well as a pre-requisite for SharePoint migration.

Compliance Improvement Action

Ongoing development and roll out of function-based folder structures on network drives, based on the BCS in preparation for migration to new SharePoint EDRM solution.

Implementation of BCS in SharePoint EDRM solution through design, configuration and implementation of function-based information architecture.

For more detail, see the Information Management Development Plan.

Responsible officer(s)

Iain Jackson, Governance, Risk and Safety Manager

Evidence of compliance

Ref No.	Title
5	Information Management Development Plan
6	Argyll & Bute Council Information Management Strategy 2026-2029
19	MS Teams – New Site Request screenshot

20	IAR Implementation Guidance
21	Original IAR – Legal & Regulatory Support
22	Simplified IAR example – Legal & Regulatory Support
30	Integrated Business Classification & Retention Schedule

Element 5: Retention schedules

Records are retained and disposed of in accordance with the Retention Schedule

Statement of compliance

Argyll and Bute Council Records Retention Schedule is based on the Scottish Council on Archives Record Retention Schedules (SCARRS) as the basis for outlining retention information for our records. The Schedule has been developed to comply with relevant legislation and statutory regulation, strategic and operational business requirements, which are determined by the relevant business area, and enduring archival value.

The information asset registers reference retention rules for each information asset as well as the system/location of assets to support consistent and compliant retention and disposal implementation.

Implementation of retention rules in key council business systems are managed as part of a priority-based record-keeping requirement assessment of current systems, with necessary action identified, documented and added to the Council's ongoing Information Management Development Plan to ensure compliance with retention and disposal policy.

Some examples of the systems where this is already established are:

- Civica
- CRM- Netcall
- Oracle CRM case management

Some examples of the systems where this process is currently in progress:

- iTrent
- MS Sharepoint (as part of the M365 IM Project)
- Iken

This process is also undertaken as part of the change management process for replacement or upgrading of existing systems or introduction of new systems.

SharePoint has been selected as the primary system for storage and management of unstructured records other than those stored in other Council business systems. A combination of default SharePoint retention policies and labels will be applied to all Council records and other information assets, based on the business activity associated with the content stored.

Early adopter areas have been implementing BCS and retention schedule on shared drives by developing file plans, rationalising on file server. This is both an end in itself, as well as a pre-requisite for SharePoint migration.

Compliance Improvement Action

Ongoing roll out of function-based retention for existing content and automated using SharePoint functionality. Retention will be retrospectively applied to existing files in network drives as well as on-prem and on-line SharePoint as part of the file cleansing in preparation for SharePoint migration.

The retention schedule will be reviewed at corporate and directorate levels as part of the business classification, retention schedule and information asset register consolidation work.

Subsequently an iterative process of ongoing reassessment involving directorate information asset owners will be put in place to ensure that the Retention Schedule is kept accurate and up to date. All information assets captured in the information asset register will include reference to the relevant retention policy in line with the Retention Schedule.

Exceptions to the default retention labels currently applied to M365 SharePoint document libraries will then be identified, configured, published and applied to relevant content in document libraries and other workloads using retention policies and labels as appropriate. Appropriate guidance and training will be provided to relevant staff should non-default retention labels need to be manually applied. For more detail, see the Information Management Development Plan.

Responsible officer(s)

Iain Jackson, Governance, Risk and Safety Manager

Evidence of compliance

Ref No.	Title
5	Information Management Development Plan
6	Argyll & Bute Council Information Management Strategy 2026-2029
20	IAR Implementation Guidance
21	Original IAR – Legal & Regulatory Support
22	Simplified IAR example – Legal & Regulatory Support
30	Integrated Business Classification & Retention Schedule

Element 6: Destruction arrangements

Records are destroyed in a timely and appropriate manner, and records of their destruction are maintained.

Statement of compliance

The destruction of records is an essential part of records management, as it ensures records are not retained longer than necessary. The retention periods outlined in the Information Asset Registers detail how long records should be held for, and what should happen to each record at the end of their retention period.

Paper records: Whenever possible, confidential paper records are shredded in council offices using appropriate equipment. The council has a contract with Shanks for the uplift and destruction of confidential waste where shredding is not possible. Non-confidential records are disposed of by recycling.

IT equipment: The council currently has a contract in place for the safe and secure disposal of redundant IT equipment. This contract ensures that any redundant IT assets are disposed of in accordance with WEEE regulations.

Backups: Records stored on network file servers or in existing EDWMS/ case management systems are backed up automatically each night. Backups are stored for an agreed period of time before being overwritten (and therefore destroyed).

Electronic records: As part of file cleansing in preparation for SharePoint migration, retention rules are being retrospectively applied to existing files on network drives. Only current files, and those still within their retention period, will be migrated to Microsoft 365, where appropriate retention labels will be applied to ensure timely disposal in line with the Council's retention schedule. Files no longer required will remain on the network drives for an agreed period, with access restricted and content made read-only, before being securely deleted.

The majority of case-based electronic data held by the Council is held within the Civica document management system, and the council has recently approved the extension of the functionality of Civica to include, amongst other features, the disposals module as referenced within Element 5.

The Council has produced a disposal of records guidance document, which is available to all employees on the intranet.

Compliance Improvement Action

Further work needs to be done to develop more detailed disposition procedures and controls for SharePoint and other M365 workloads as part of the future development work under element 5 above. This will include the disposition review process and production of records of disposal, where proof of destruction is required.

Implementation of disposal / deletion arrangements for content held in other council business systems will be managed as part of a wider record-keeping requirements assessment of each current system, with necessary action identified, documented and added to the organisation's ongoing records management workplan.

This process will also be undertaken as part of the change management process for replacement or upgrading of existing systems or introduction of new systems. For more detail, see the Information Management Development Plan.

Responsible officer(s)

Iain Jackson, Governance, Risk and Safety Manager

Evidence of compliance

Ref No.	Title
5	Information Management Development Plan
6	Argyll & Bute Council Information Management Strategy 2026-2029
31	Asset Management Strategy 2025
32	Cyber Security Policy (Draft)
33	Disposal of Records Guidance
34	Confidential Waste Disposal Procedure
35	Shanks Confidential Shredding Contract Excerpt
36	Existing ICT Procedures – Arrow
37	Tes IT Item Destruction Breakdown
38	Tes IT Certificate of Data Erasure
39	Tes IT Certificate of Hardware Destruction

Element 7: Archiving and transfer arrangements

Records that have enduring value are permanently retained and made accessible in accordance with the Keeper's 'Supplementary Guidance on Proper Arrangements for Archiving Public Documents'.

Statement of compliance

Argyll and Bute Council's in-house archive was transferred to LiveArgyll in 2017. The Archives provide facilities to permanently preserve records of historical, or business value as indicated on the Council retention schedule. The aim of the Archives is to acquire, preserve, and make available to the public, those records of Argyll and Bute Council (and of other organisations, businesses and families within the area) that have been assessed as being historically significant. LiveArgyll has a dedicated Archivist who advises on selection and transfer processes, and who ensures compliance with professional archival standards. The Central Archive Procedures document has recently been updated and sets out the acquisition requirements and transfer arrangements to the archive.

Certain historic records of Argyll and Bute Council (and predecessors) are held by the Mitchell Library in Glasgow. Our Social Work Service also use an external archive company, Oasis, to store paper records.

Services within the Council which have records that require to be kept permanently, and which meet the acquisition requirements of the archive can transfer those records using the Central Archives Procedures.

Compliance Improvement Action

Digital records cannot be accepted by the Archives at the moment, although options for implementing a digital repository are being explored as part of the specification of requirements for the EDRMS solution in SharePoint, including technical controls to ensure that archival preservation requirements for these records are taken account of through their lifecycle in accordance with the Keeper's 'Supplementary Guidance on "Proper Arrangements for Archiving Public Documents"'.

This would increase the range of records that could be acquired and preserved by the facility.

Within some areas of the organisation, records are required to be kept for as long as 100 years – these records are not transferred to the Archives, but are stored appropriately in secure locations, based on the requirements of the Service. Our Information Management Development Plan includes an action to make improvements in this area – by requiring Services to review and update existing processes to ensure clearer guidance is available to staff.

For more detail, see the Information Management Development Plan.

Responsible officer(s)

Iain Jackson, Governance, Risk and Safety Manager

Evidence of compliance

Ref No.	Title
5	Information Management Development Plan
6	Argyll & Bute Council Information Management Strategy 2026-2029
40	Central Archives Procedure
41	Mitchell Library Records Tracker

Element 8: Information security

Records are held in accordance with information security compliance requirements.

Statement of compliance

All Council employees (and any third parties requiring access to the Council's network) must formally accept the requirements of the Acceptable Use Policy (AUP) before being granted access to the Council's IT resources. The AUP covers a number of security issues including password guidance; email and IM messaging guidance; use of internet, social media and business mobile phones.

In 2014, the Council became a member of the Public Services Network (PSN), which is a connected community that provides secure connections and communications with other UK public sector bodies. The Council adheres to the Public Service Network (PSN) Code of Conduct through the adoption of compliant security management processes and procedures.

We have achieved Cyber Essential accreditation since 2022 and demonstrated our commitment to maintain the cybersecurity standards set out in the framework. This accreditation strengthens our information security posture by having key technical controls – such as secure configuration, access control, boundary firewalls, patch management and malware protection – to defend against the most high-risk cyber threats. This approach helps protect the council sensitive data and support compliance with other regulatory frameworks.

We have developed a draft Cyber Security policy to achieve the security objectives to maintain the confidentiality, integrity and availability of the council's data. The policy will soon be presented to policy and resources committee for full council approval. However, it provides guidance and expectations on key information security areas such as data classification, network user training, personnel and physical security.

The information asset register enables the linking of the Council's information security classifications and security arrangements with its records and related information assets.

In terms of physical security, all of our offices are either manned by a reception desk, with visitors being required to sign in before they can access the building, or secure entry systems are in place (i.e. staff use codes or key fobs to enter the building).

Compliance Improvement Action

The rollout of M365 provides opportunities to strengthen information security by implementing sensitivity labels, conditional access controls, and automated monitoring. Future developments will focus on embedding the Council's information

security classification scheme across digital repositories, and ensuring staff understand how to apply it consistently.

For more detail, see the Information Management Development Plan.

Responsible officer(s)

Iain Jackson, Governance, Risk and Safety Manager
Stuart McGeachy, ICT Compliance and Security Officer

Evidence of compliance

Ref No.	Title
5	Information Management Development Plan
6	Argyll & Bute Council Information Management Strategy 2026-2029
11	M365 Information Governance Check – Approval Request Form
20	IAR Implementation Guidance
21	Original IAR – Legal & Regulatory Support
22	Simplified IAR example – Legal & Regulatory Support
23	ICT Acceptable Use Policy
31	Asset Management Strategy 2025
32	Cyber Security Policy (Draft)
37	Tes IT Item Destruction Breakdown
38	Tes IT Certificate of Data Erasure
39	Tes IT Certificate of Hardware Destruction
42	Cyber Essentials 2024 Certificate
43	Public Service Network Connection Compliance Certificate
44	IT System Supplier Security Risk Assessment Template

Element 9: Data protection

Records involving personal data are managed in compliance with data protection law.

Statement of compliance

Argyll and Bute Council is registered under the under the Data Protection Act 2018 as a data controller (registration number Z5909574) with the Information Commissioner's Office. The registration number for the Argyll and Bute Council Licensing Board is: ZA171116.

Douglas Hendry, Executive Director is the Council's Senior Information Risk Officer and the Council's Data Protection Officer is the Governance, Risk and Safety Manager who provides advice, oversight, and reports on compliance to senior management.

Policies and procedures are in place to support data protection by design and default, including the use of Data Protection Impact Assessments (DPIAs) for high-risk processing.

Staff are made aware of their responsibilities through guidance, e-learning and targeted training, including a mandatory training module on the Council's Learning Management System – LEON. This must be completed as part of the induction process and thereafter refresher training must be completed every year.

Compliance Improvement Action

Future work will focus on strengthening the integration of data protection with records management practices, particularly within M365. This includes improving the linkage between Information Asset Registers and Records of Processing Activities and ensuring that retention and disposal actions are consistently applied to personal data.

For more detail, see the Information Management Development Plan.

Responsible officer(s)

Iain Jackson, Governance, Risk and Safety Manager

Evidence of compliance

Ref No.	Title
5	Information Management Development Plan
6	Argyll & Bute Council Information Management Strategy 2026-2029
11	M365 Information Governance Check – Approval Request Form
12	Records Management & Access to Information Intranet Screenshot

17	Setting up Meetings involving Customers/Clients Guidance
18	Setting up Meetings involving Customers/Clients using Shared Calendars
20	IAR Implementation Guidance
21	Original IAR – Legal & Regulatory Support
22	Simplified IAR example – Legal & Regulatory Support
23	ICT Acceptable Use Policy
44	IT System Supplier Security Risk Assessment Template
45	Data Protection Policy
46	Subject Access Request Procedure
47	Data Protection Breach Procedure
48	DPIA Guidance and Template
49	Consent Briefing Note for Staff
50	Rights of Data Subjects Briefing Note
51	LEON Mandatory Training Information
52	Privacy Notice Guidance
53	Meeting Recordings Guidance
54	Argyll & Bute Council DP Registration Certificate
55	Argyll & Bute Licensing Board DP Registration Certificate

Element 10: Business continuity and vital records

Record recovery, prioritising vital records, is an integral part of the authority's business continuity planning.

Statement of compliance

The Council recognises the critical role of records in ensuring continuity of services during disruption. To ensure business continuity and availability of vital records, Argyll and Bute Council has Critical Activity Recovery Plans (CARPs) in place for essential services which are reviewed annually. These include a section which covers data and records, where the CARP owner must identify the electronic and paper records that are essential for their service to ensure that arrangements are in place to ensure they are protected and recoverable. Backup processes are managed by ICT to provide resilience for key systems, and procedures exist for recovering essential records in the event of system failure or other incidents.

Compliance Improvement Action

As part of their process of continuous improvement and exploitation of technology advances, Argyll and Bute Council has recently invested in a Business Continuity Management System – Meridian - and is currently implementing this to replace the current manual business continuity processes.

Business continuity planning will also align with our new streamlined Information Asset Register.

For more detail, see the Information Management Development Plan.

Responsible officer(s)

Iain Jackson, Governance, Risk and Safety Manager

Evidence of compliance

Ref No.	Title
5	Information Management Development Plan
6	Argyll & Bute Council Information Management Strategy 2026-2029
20	IAR Implementation Guidance
21	Original IAR – Legal & Regulatory Support
22	Simplified IAR example – Legal & Regulatory Support
32	Cyber Security Policy (Draft)
56	Business Continuity Management Policy
57	Business Continuity Management System Awareness Presentation
58	Business Continuity Plan Template
59	Critical Activity Recovery Plan – Elections

60	Business Impact Assessment Report – Compliance & Regulatory
Function	
61	Business Continuity Plan – Compliance & Regulatory Function

Element 11: Audit trail: tracking and version control

The location of records is known and changes recorded.

Statement of compliance

Electronic Records: The Council uses a number of bespoke electronic case / document management systems, in various service areas of the organisation, including:

- Extensive use of Civica EDMWS is made within Planning, Building Standards, Environmental Health, Trading Standards, Revenues and Benefits, Human Resources, Creditors, and for general mail handling.
- IKEN case management is used by Legal Services
- Modern.gov is used to manage agendas / minutes and support Committee processes.
- a Customer Relationship Management System (for various contacts – general enquiries, complaints, enquiries via Elected Members)
- Freedom of Information and Subject Access request management system

These systems provide an audit trail of all records within their remit.

There are a number of independent Sharepoint sites in use across the organisation which provide an audit trail for records held in these sites.

The implementation of SharePoint EDRMS, together with the migration of relevant files from network drives, will provide a full audit trail for all records and deliver a more efficient and robust solution for storing, maintaining and disposing of unstructured electronic records.

The Council's Naming Convention guidance has been updated to reflect SharePoint requirements, including file naming and version control, and has been approved by the ELT.

Paper Records: The majority of records are now electronic, therefore when paper files are in use, these tend to be working documents, or copies of a record which is held electronically. However, in some areas of the organisation, paper records are still held. When these records are moved from one stage to another, or transferred between locations, an audit trail is kept via record logs – for example, added to a log of closed files. To ensure consistency across the organisation, guidance and a standard template for tracking paper records is accessible on the Hub for staff to refer to.

Argyll and Bute Council's Disposal Arrangements (see Element 6), advise that when destroying records, regardless of their format, a record disposal form is required to be completed. This form acts as an audit trail for any records which are destroyed.

Compliance Improvement Action

As part of the SharePoint EDRMS rollout

- version control, activity logs and audit capabilities will be implemented
- integrate audit checks and SharePoint usage analytics into compliance and performance monitoring and reporting frameworks and to identify compliance and risk trends
- training on the updated naming convention guidance will be provided to all staff and will also be embedded in induction and refresher records management training

For more detail, see the Information Management Development Plan.

Responsible officer(s)

Iain Jackson, Governance, Risk and Safety Manager

Evidence of compliance

Ref No.	Title
5	Information Management Development Plan
6	Argyll & Bute Council Information Management Strategy 2026-2029
42	Cyber Essentials 2024 Certificate
62	Naming Convention & Version Control Guidance
63	Tracking Physical Records
64	Audit Trail Example

Element 12: Records management training for staff

Staff creating, or otherwise processing records, are appropriately trained and supported.

Statement of compliance

Argyll and Bute Council recognises that in-depth records management knowledge is required within the organisation, to ensure compliance with legislation, and that practices are kept up to date. The Council also recognises that it is important for basic records management principles and functions to be embedded in every aspect of the organisation, and therefore, it is essential that all employees are given the information and knowledge necessary to achieve this, appropriate to their roles and responsibilities.

Day-to-day responsibility for Records Management within Argyll and Bute Council currently lies with the Governance, Risk and Safety Manager. It is a requirement that this post:

“Has a sound knowledge of records management theory and practice, including current standards and recognised best practice”
(extract from job description)

This is achieved by ensuring the Compliance & Regulatory team receives up-to-date professional training, subscribes to field-specific mailing lists, and is a member of the appropriate forums where current knowledge and practice is shared.

The Council operates an online learning module (LEON), which is available to all employees. This includes an intro to RM, and mandatory short e-learning modules Data Protection and Freedom of Information requirements and responsibilities – for new starts and annual refreshers.

Compliance Improvement Action

Make the records management course on LEON mandatory as part of the induction process with the requirement to complete a refresher course every two years to ensure that employees of Argyll and Bute Council have access to the resources required to follow good records management practices to comply with Council policy and to better support them in their job role.

Develop and deliver role-based training through the life cycle of the M365 IM project and beyond to business-as-usual.

For more detail, see the Information Management Development Plan.

Responsible officer(s)

Iain Jackson, Governance, Risk and Safety Manager

Evidence of compliance

Ref No.	Title
5	Information Management Development Plan
6	Argyll & Bute Council Information Management Strategy 2026-2029
8	Training Attendance
12	Records Management & Access to Information Intranet Screenshot
13	MS Teams Guidance
14	MS Forms Guidance
15	OneDrive Guidance
16	OneNote Guidance
17	Setting up Meetings involving Customers/Clients Guidance
18	Setting up Meetings involving Customers/Clients using Shared Calendars
23	ICT Acceptable Use Policy
25	Managing Records & Information Intranet Guidance
28	Records Management Guidance
51	LEON Mandatory Training Information
53	Meeting Recordings Guidance
65	M365 Online Guide
66	Corporate Records Management Training Slide Pack
67	Accessing LEON M365 Training

Element 13: Assessment and review

Records Management arrangements are regularly and systematically reviewed with actions taken when required.

Statement of compliance

The Council is committed to reviewing and improving its records management arrangements on a regular basis. The RMP will be reviewed every two years and updated in line with organisational and legislative changes. A Progress Update Reports (PUR) submitted to the Keeper following each review.

The Records Management Plan will be subject to an implementation audit, which will take place within 18 months of the plan being implemented. The implementation audit will be undertaken by Argyll and Bute Council's Internal Audit Team. The aim of this audit is to determine whether the records management plan is operating as expected in terms of the roll-out of the M365 project.

In order to continuously review the records management plan and ensure that it still meets the needs of the council, the Governance, Risk and Safety Manager, with the support of the Internal Audit Team, will carry out an audit of 3 out of elements 4-12 of the plan on an two yearly basis. The content of the review will take into account the level of risk associated with the element and consider any other source of assurance that might be available.

Any recommendations that arise from the audit will be subject to a follow up review; this will ensure any weaknesses are addressed and resolved.

Compliance Improvement Action

Future work will focus on embedding a formal cycle of review and self-assessment against the Keeper's Model Plan. This will include annual reviews of the Information Management Strategy and Action Plan, supported by evidence from service audits and lessons learned from FOI, data protection and internal governance reviews. Findings will be reported to senior management and used to refine improvement priorities, ensuring the RMP remains a living document.

For more detail, see the Information Management Development Plan.

Responsible officer(s)

Iain Jackson, Governance, Risk and Safety Manager

Evidence of compliance

Ref No.	Title
5	Information Management Development Plan
6	Argyll & Bute Council Information Management Strategy 2026-2029
20	IAR Implementation Guidance
21	Original IAR – Legal & Regulatory Support
22	Simplified IAR example – Legal & Regulatory Support

Element 14: Shared information

Information sharing, both within the Authority and with other bodies or individuals, is necessary, lawful, and controlled.

Statement of compliance

The council recognises that sharing and protecting information are both essential to working together with colleagues, business partners, stakeholders and others to develop a joined-up approach to public services and better serve the public. Information sharing is governed by corporate policies and supported by formal agreements where appropriate, ensuring compliance with data protection and other legislation. Staff guidance is available to help ensure that information is shared securely, proportionately, and lawfully.

The council uses the [Information Commissioner's Data Sharing Code of Practice](#) as a best practice guide to sharing information. Data Sharing Protocols are assessed, managed and overseen by the Governance, Risk and Safety Manager. In line with the code of practice, where personal data is shared, consideration is given to the need for a data protection impact assessment and any transparency requirements for data subjects.

The Council Information Asset Register, which incorporates the organisation's Record of Processing Activities, records all existing internal and external information sharing requirements and controls against each main information asset. This includes reference to data sharing agreements, data processing agreements, and data protection impact assessments where relevant.

Compliance Improvement Action

The rollout of M365 provides opportunities to maximise the benefits of appropriate information sharing while ensuring information is protected, through the use of security features including sensitivity labels, conditional access and automated monitoring, with training provided and procedures and guidance updated accordingly.

For more detail, see the Information Management Development Plan.

Responsible officer(s)

Iain Jackson, Governance, Risk and Safety Manager

Evidence of compliance

Ref No.	Title
5	Information Management Development Plan
6	Argyll & Bute Council Information Management Strategy 2026-2029
20	IAR Implementation Guidance
21	Original IAR – Legal & Regulatory Support
22	Simplified IAR example – Legal & Regulatory Support

Element 15: Public records created or held by third parties

Adequate arrangements must be in place for the management of records created and held by third parties who carry out any functions of the authority.

Statement of compliance

The Council recognises its responsibility for records created or held by contractors carrying out any of the Council's public functions.

The following wording is in our council standard special terms and conditions:

DOCUMENT RETENTION 37.1. The Public Records (Scotland) Act 2011 places an obligation on public authorities to ensure all public records are managed in accordance with a Records Management Plan, as approved by the Keeper of the Records of Scotland. Section 3(1)(b) of the Act defines public records as "records created by or on behalf of a contractor in carrying out the Council's functions". The Contractor shall for the duration of the Agreement provide the Council with all assistance reasonably requested by the Council to assist the Council in complying with its obligation and with the Council's Records Management Plan where such compliance is in respect of records created or to be created by the Contractor on behalf of the Council in terms of this Agreement. The Contractor will indemnify the Council in respect of any claims arising due to a contractor's breach of that Act.

The Information Asset Register identifies any information assets relating to record-keeping of any of the Council's public functions carried out by contractors.

Compliance Improvement Action

The [guidelines for contractors](#), supplied by the Scottish Council on Archives will be made available on the Procurement page on the Council's website at this link [Procurement | Argyll and Bute Council](#) in order that Contractors are aware of the Council's expectations for retention, security, access, and eventual transfer or destruction.

For more detail, see the Information Management Development Plan.

Responsible officer(s)

Iain Jackson, Governance, Risk and Safety Manager

Evidence of compliance

Ref No.	Title
5	Information Management Development Plan
6	Argyll & Bute Council Information Management Strategy 2026-2029

20	IAR Implementation Guidance
21	Original IAR – Legal & Regulatory Support
22	Simplified IAR example – Legal & Regulatory Support
68	Contract Standing Orders Including Terms

Appendix 1: Submitted evidence

Please find below a list of evidence submitted in support of each of the elements of the Records Management Plan. This evidence has been submitted as individual files or via the provided web link.

Ref No.	Title	Elements Supported
1	Letter from the Executive Director	1, 2
2	Protocol for the office of the Monitoring Officer	1
3	Letter from the Clerk to the Licensing Board	1
4	Policy & Resources Committee Minute Extract	1, 2, 3
5	Information Management Development Plan	All
6	Argyll & Bute Council Information Management Strategy 2026-2029	All
7	Governance, Risk & Safety Manager Job Description	2
8	Training Attendance	2, 12
9	Managing and Archiving Email and Messages Policy	3
10	Artificial Intelligence Policy	3
11	M365 Information Governance Check – Approval Request Form	3, 8, 9
12	Records Management & Access to Information Intranet Screenshot	3, 9, 12
13	Ms Teams Guidance	3, 12
14	Ms Forms Guidance	3, 12
15	OneDrive Guidance	3, 12
16	OneNote guidance	3, 12
17	Setting up Meetings involving Customers/Clients Guidance	3, 9, 12
18	Setting up Meetings involving Customers/Clients using Shared Calendars	3, 9, 12
19	Ms Teams – New Site Request screenshot	3, 4
20	IAR Implementation Guidance	3, 4, 5, 8, 9, 10, 13, 14, 15
21	Original IAR – Legal & Regulatory Support	3, 4, 5, 8, 9, 10, 13, 14, 15
22	Simplified IAR example – Legal & Regulatory Support	3, 4, 5, 8, 9, 10, 13, 14, 15
23	ICT Acceptable Use Policy	3, 8, 9, 12
24	Information Management Approach	3
25	Managing Records & Information Intranet Guidance	3, 12
26	IM Project Brief	3
27	PRSA M365 Guidance – Requirements Checklist	3
28	Records Management Guidance	3, 12
29	Records Management Policy	3
30	Integrated Business Classification & Retention Schedule	4, 5
31	Asset Management Strategy 2025	6, 8
32	Cyber Security Policy (Draft)	6, 8, 10
33	Disposal of Records Guidance	6
34	Confidential Waste Disposal Procedure	6
35	Shanks Confidential Shredding Contract Excerpt	6

Ref No.	Title	Elements Supported
36	Existing ICT Procedures – Arrow	6
37	Tes IT Item Destruction Breakdown	6, 8
38	Tes IT Certificate of Data Erasure	6, 8
39	Tes IT Certificate of Hardware Destruction	6, 8
40	Central Archives Procedure	7
41	Mitchell Library Records Tracker	7
42	Cyber Essentials 2024 Certificate	8, 11
43	Public Service Network Connection Compliance Certificate	8
44	IT System Supplier Security Risk Assessment Template	8, 9
45	Data Protection Policy	9
46	Subject Access Request Procedure	9
47	Data Protection Breach Procedure	9
48	DPIA Guidance and Template	9
49	Consent Briefing Note for Staff	9
50	Rights of Data Subjects Briefing Note	9
51	LEON Mandatory Training Information	9, 12
52	Privacy Notice Guidance	9
53	Meeting Recordings Guidance	9, 12
54	Argyll & Bute Council DP Registration Certificate	9
55	Argyll & Bute Licensing Board DP Registration Certificate	9
56	Business Continuity Management Policy	10
57	Business Continuity Management System Awareness Presentation	10
58	Business Continuity Plan Template	10
59	Critical Activity Recovery Plan – Elections	10
60	Business Impact Assessment Report – Compliance & Regulatory Function	10
61	Business Continuity Plan – Compliance & Regulatory Function	10
62	Naming Convention & Version Control Guidance	11
63	Tracking Physical Records	11
64	Audit Trail Example	11
65	M365 Online Guide	12
66	Corporate Records Management Training Slide Pack	12
67	Accessing LEON M365 Training	12
68	Contract Standing Orders Including Terms	15