

Summary of the Records Management Plan and related Documents

1. EXECUTIVE OVERVIEW

Item 8 deals with the **entire overhaul of Argyll and Bute Council's Records Management framework**, triggered by the statutory requirement to **submit a revised Records Management Plan (RMP) to the Keeper of the Records of Scotland by 28 February 2026**, as required under the **Public Records (Scotland) Act 2011 (PRSA)**.

The revised plan is more digitally-aligned than the 2017 RMP. It absorbs post-COVID learning, M365 transformation work, and modern legislative expectations around information governance, data protection, and digital storage.

The paper requests approval of:

- **The revised Records Management Plan**
- **The Records Management Development Plan**
- **The updated Information Management Strategy**
- **The updated Business Classification Scheme & Records Retention Schedule**
- **The Data Protection Policy**
- **The revised Records Management Policy**
- **A new 'Managing and Archiving Email and Messages Policy'**

These represent the *full suite* of documents needed for statutory compliance and service-wide consistency in the management of the Council's records.

2. CONTEXT AND DRIVERS FOR CHANGE

2.1 The Public Records (Scotland) Act 2011

The PRSA requires public authorities to:

- Create a Records Management Plan (RMP)
- Submit it to the Keeper for approval

- Demonstrate *actual day-to-day compliance*
- Review and resubmit revised plans as required

The Council's previous RMP (approved March 2017) no longer reflected:

- Digital transformation (M365, SharePoint, automation)
- Updated information governance roles
- New legislation, such as the UK GDPR and Data Protection Act 2018
- Changes in business structure, systems, and working practices
- Lessons from significant public-sector cyber incidents nationally
- Post-COVID hybrid working implications for recordkeeping

2.2 Strategic Shift

Since 2017, information management has undergone:

- A complete strategic refresh
- Introduction of modern digital architecture (M365, SharePoint)
- Major cultural shift about information as an "asset"
- Greater emphasis on:
 - data protection
 - security
 - data lifecycle management
 - FOI/SAR responsiveness
 - automation of retention and disposal

The new RMP therefore moves the Council into a **modern, structured, and strategically governed information environment**.

3. THE RECORDS MANAGEMENT PLAN (THE CORE DOCUMENT)

The RMP is structured around the Keeper's **15 statutory elements**, each of which must be evidenced. The Council's revised plan provides a compliance statement, evidence list, and improvement actions for each element.

The 15 Elements (high-level)

1. Senior management responsibility
2. Operational records management responsibility
3. Records management policy
4. Business classification

5. Retention schedules
6. Destruction arrangements
7. Archiving and transfer
8. Information security
9. Data protection
10. Business continuity
11. Audit trail
12. Staff training
13. Assessment and review
14. Information sharing
15. Third-party / contractor records

The plan shows **full alignment** with each element, setting out:

- The responsible officers
- The current arrangements
- The gaps
- The improvement actions
- The evidence base

Key improvements since 2017

- A complete refresh of the Information Asset Register methodology
- Adoption of Microsoft 365 as the strategic records management platform
- Strengthened roles: SIRO, DPO, Records Manager
- Improved policy suite
- Better integration of Data Protection + Records Management
- A new Council-wide Business Classification Scheme
- Automated retention roadmap using SharePoint / Purview

4. RECORDS MANAGEMENT DEVELOPMENT PLAN (RMDP)

This is the **forward programme of work** attached to the RMP.

Its purpose

- Deliver the RMP in practice
- Guide M365 implementation
- Standardise recordkeeping across all services
- Remove legacy storage risks
- Automate retention, destruction, and archiving

- Improve staff capability

Major Themes within the RMDP

4.1 Digital Transformation of Records

- Migration of all active corporate records to SharePoint
- Rationalising network drives
- Automating retention via M365 labels and policies
- Implementing consistent folder structures based on BCS
- Rolling out SharePoint governance and naming conventions

4.2 Records Governance

- Strengthening Directorate-level Information Asset Owners
- Annual IM compliance reporting
- Embedding the Information Management Board and Working Groups

4.3 Cultural Change

- Mandatory training expansion
- Role-based training (e.g. managers, data handlers)
- Full policy cascade via The Hub and M365 dashboards

4.4 Assurance and Audit

- Internal Audit review within 18 months
- Two-year rolling review cycle of all RMP elements
- Annual Progress Update Report to the Keeper

The RMDP is a **multi-year programme** which recognises that digital transformation of records is not a single project, but an ongoing maturity journey.

5. INFORMATION MANAGEMENT STRATEGY (2026–2029)

This sets the direction for how the Council manages information.

5.1 Vision

Information is:

- Recognised as a critical corporate asset
- Managed consistently and securely
- Accessible to those who need it
- Protected from loss, breach, or misuse
- Leveraged for better service design and decision-making

5.2 Strategic Objectives

1. **Governance & Leadership**
 - strengthen corporate IM structures
 - clarify roles and accountability
 2. **Policies and Standards**
 - maintain a complete, modern policy framework
 - embed compliance expectations into business processes
 3. **Systems and Architecture**
 - move to a single modern digital records environment
 - eliminate unstructured, unmanaged data holdings
 4. **People & Culture**
 - build skills and confidence in IM across the workforce
 - mandatory training and role-specific training
 - embed IM across workflows, not just IT
 5. **Compliance & Risk Management**
 - ensure regulatory compliance
 - reduce information risk exposure
 - strengthen business continuity and cyber resilience
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6. BUSINESS CLASSIFICATION SCHEME (BCS) AND RECORDS RETENTION SCHEDULE (RRS)

6.1 What the BCS is

A **three-tier hierarchical structure** representing:

- Council functions
- Activities within each function
- Transactions within each activity

It provides:

- a consistent structure for filing

- common metadata
- predictable information retrieval
- ability to automate retention

6.2 What the RRS is

A comprehensive schedule, derived from:

- Scottish Council on Archives' SCARRS
- Statutory requirements
- Internal business needs

For each type of record it sets:

- the required retention period
- the disposal action (destroy / review / archive)
- dependencies (legal, financial, audit, statutory)
- relevant policies

6.3 Why it matters

The BCS and RRS are the **core enablers of automation** for SharePoint retention labels and lifecycle management.

Without them:

- M365 cannot implement automatic retention
- FOI/SAR responses become inconsistent
- Information becomes siloed and unstructured
- Destruction cannot be legally defensible

The Council now has a fully integrated BCS + RRS ready for deployment across M365.

7. DATA PROTECTION POLICY

This Policy sets the Council's framework for complying with:

- UK GDPR
- Data Protection Act 2018
- ICO codes of practice

7.1 Key Features

- Defines roles (Controller, DPO, Data Handlers)
- Sets out data protection principles
- Data subject rights framework
- Procedures for:
 - SARs
 - Data Breaches
 - DPIAs
 - Consent management
 - Transparency / privacy notices

7.2 Integration with Records Management

- All personal data must follow the RRS
 - Records must not be held longer than necessary
 - Deletion must be secure, auditable, and timely
 - Data sharing must be controlled, documented, and risk assessed
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8. RECORDS MANAGEMENT POLICY

This is the central operational policy applying to:

- All council staff
- Temporary staff
- Volunteers
- Third-party processors

8.1 Purpose

- Promote consistent recordkeeping
- Ensure compliance with PRSA, FOI, GDPR, and other laws
- Provide direction for creation, storage, maintenance, retention, and disposal

8.2 Core Principles

- Records must be:
 - complete
 - accurate
 - authentic
 - accessible
 - secure
 - managed for their full lifecycle

8.3 Responsibilities

- **SIRO** – executive leadership and risk oversight
- **Governance, Risk & Safety Manager** – operational lead
- **Service Directors** – accountable for local compliance
- **All Staff** – must follow policies and guidance

8.4 Disposal

- Must be:
 - authorised
 - documented
 - secure
 - aligned with retention schedules
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9. MANAGING AND ARCHIVING EMAIL AND MESSAGES POLICY

This is a **new policy**, brought in because:

- Email systems are not a suitable long-term record repository
- M365 offers much better governance options through SharePoint

9.1 Key Requirements

- Emails and Teams messages that constitute records must be saved into the official recordkeeping system
- Email inboxes are not record stores
- Staff must identify what constitutes a “record”
- Automated email destruction requires proper saving of records to avoid loss

9.2 Rationale

- To reduce risk
 - To comply with FOI/GDPR
 - To support search capability
 - To enable digital transformation
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10. KEY ORGANISATIONAL IMPACTS

10.1 Compliance & Legal

- Ensures PRSA compliance
- Reduces FOI/SAR risk
- Ensures privacy and data protection obligations
- Provides defensible destruction

10.2 Operational

- Consistent approach across all services
- Reduced duplication and inefficiency
- Improved decision-making record

10.3 Digital Transformation

- Moves Council toward best-practice digital recordkeeping
- Reduces reliance on paper and network drives
- Enables automation

11.4 Risk Reduction

- Minimises cyber and information security threats
- Eliminates unmanaged data silos
- Reduces legacy system dependency

11. CONCLUSION

Item 8 presents a significant organisational modernisation steps in the Council's governance landscape. The package brings:

- Legal compliance
- Digital innovation
- Cultural change
- Risk reduction
- Stronger governance
- Higher service efficiency

It is thorough, comprehensive, and future-proofed.