ABERDEEN CITY COUNCIL

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| COMMITTEE | Finance, Policy and Resources |
| DATE | 4 December 2014 |
| DIRECTOR | Ewan Sutherland (Interim) |
| TITLE OF REPORT | Corporate Information and Records Lifecycle Management Policy and Supporting Policies |
| REPORT NUMBER | CG/14/137 |
| CHECKLIST COMPLETED | Yes |

1.    PURPOSE OF REPORT

To provide Committee with a revised Information and Records Lifecycle Management Policy and supporting policies which provide the framework by which the Council will build an infrastructure that ensures the effective management of all our business information and records throughout their lifecycle.

2.    RECOMMENDATION(S)

2.1    That Committee note the detail of and approve the revised Information and Records Lifecycle Management Policy (Appendix 1);

2.2    That Committee note the detail appended to the corporate Business Classification Scheme Policy and Records Retention and Disposal Schedule Policy as working templates that provide a framework to collaborate with Information Asset Owners to pilot, test and refine the details where necessary;

2.3    That Committee note the detail of and approve the Supporting suite of policies:

- Business Classification Scheme Policy (Appendix 2) and corresponding template (web link pdf or excel);
- Records Retention and Disposal Schedule Policy (Appendix 3) and template (web link pdf or excel);
- Information Asset Register Policy (Appendix 4).

3.    FINANCIAL IMPLICATIONS

A Business Case for additional resource – 4 fixed term staff – is currently going through the Delegated Authority Approval cycle. Any future resource requirements within the team or within Services identified from the pilot, test and refine fixed term phase improvement programme will be subject to scrutiny from the Senior Information Risk Owner (SIRO) and Information Management Strategy Governance Group for identification of budget and approval.

4.    OTHER IMPLICATIONS

The Council has a statutory duty under the Public Records (Scotland) Act 2011 (PRSA) to ensure that all of our information and records are managed appropriately.    The Information & Records Lifecycle Management Policy introduces a revised and cohesive approach to developing the Council's maturity in managing the lifecycle of its information and records, as a key part of delivering on the Council's strategic Information Management objectives. The improvement programme will reflect the Council's comprehensive and integrated approach, outlined in the [Information Management Strategy](#), and will focus on managing information and records according to:

• Business context (why information and records exist and
  therefore how long they should be held);
•  Content (what information and records are about and therefore
  who has access to them);
•  Location (where and how information and records are held and
  therefore what business continuity arrangements are required/
  appropriate);
• Information Asset Owner (the job role responsible for the
  information and records, and therefore accountable for ensuring
  the authenticity, usability, reliability and integrity of the information
  and records over time and through any change).

The Information and Records Lifecycle Management Policy, supporting policies and associated improvement programme will allow the Council to develop a full understanding, and more effective control of the information and records we create and hold over time and during change.  This will support our compliance with other, related legislation, such as Data Protection and Freedom of Information.

These policies reflect the Council's high level statement of intent about how we will manage all our business information and records, as well as informing the improvement programme to implement the appropriate practice and procedures consistently across the organisation. Three of the additional staff identified in the Business Case will work with business areas to pilot, refine and test the implementation of Service File Plans using the Business Classification Scheme (BCS) and Records Retention and Disposal Schedule (RRDS) templates

presented with this report. The corporate BCS and RRDS appended to the policies are dynamic tools by their nature which will be subject to change and refinement as required, in consultation with relevant Information Asset Owners, in accordance with business and legal requirements.

5.      BACKGROUND/MAIN ISSUES

The Council approved its first Corporate Records Management Policy in 2010. The rationale for the Policy at that time was to acknowledge the value and demonstrate a commitment to the spirit of information legislation and promote a culture of openness and transparency internal within the organisation and external with all our customers and partners. Requests made to the Council through the Freedom of Information Scotland Act 2002 (FOISA), Environmental Information (Scotland) Regulations 2004 (EIRs) and Data Protection Act 1998 (DPA) channels had increased significantly as had public and regulatory scrutiny. From 2010, the Council has been subject to a number of information compliance assessments and audits which have made specific recommendations prompting a revision to the Policy:

**Office of Scottish Information Commissioner (OSIC)**
2010 OSIC – FOISA Good Practice Compliance Assessment
2011 OSIC – FOISA Assessment Recommendations follow-up
2012 OSIC – FOISA Good Practice Compliance Assessment
2014 OSIC – FOISA Recommendations follow-up and sign-off

**UK Information Commissioners Office (ICO)**
2013 ICO – Data Protection Compliance Audit
2014 ICO – Data Protection Audit Recommendations follow-up –
      ongoing

**Internal Audit**
2013-2014 – Information Security Review and follow-up
2014 Sep.  – PWC Phase 1Public Records (Scotland) 2011 Act
      Compliance

The more recent addition in January 2013 to the information compliance regulatory agenda was the coming into force of the Public Records (Scotland) Act 2011. The Act requires named public authorities to maintain proper arrangements to manage their information and records irrespective of the technology used to create and store them or the type of information they contain.

The principal vehicle for achieving compliance with this legislative change will be a Records Management Plan which Aberdeen City Council will be statutorily obliged to prepare and submit to the Keeper of the Records of Scotland (the "Keeper") for his approval in November 2014.

The plan has 14 elements:

- Senior Management Responsibility
- Records Manager Responsibility
- Records Management Policy Statement
- Business Classification
- Retention Schedule
- Destruction Arrangements
- Archiving and Transfer Arrangements
- Information Security
- Data Protection
- Business Continuity and Vital Records
- Audit Trail
- Competency Framework and competency framework for staff
- Assessment and Review
- Shared Information

The revised and supporting suite of Policies referred to in this report underpin and provide a framework in which the recently approved corporate Information Management Strategy objectives and Improvement Programme can be realised. Work to develop levels of maturity will commence fully from January 2015 through the Information Management Governance Group.

Compliance with the Act will be monitored and managed by the Keeper on a 'continuous improvement' basis. The Council will submit the initial Records Management Plan in November 2014, citing the corporate Information Management Strategy and Improvement Programme along with these supporting policies presented as evidence of how the Council will progress this programme of continuous improvement.

6.    IMPACT

This revised and supporting suite of policies and associated improvement programme will provide the cornerstone by which the Council will manage all Council the lifecycle of all information and records now, and in the future. It will also provide the foundational basis on which to progress and meet the Council's Information Management Strategic objectives. In addition, these policies recognise that the effective management of records and information throughout its lifecycle requires a joined-up, holistic approach, which builds upon this foundation to ensure assurance and maturity in the following domains:

- Archive and Preservation
- Business Continuity and Disaster Management
- Culture, Training and Communication
- Knowledge, Re-Use and Performance
- Information and Records Lifecycle Management
- Risk & Governance
- Technical and Physical Systems Management

The Information Management Strategy will drive this joined-up approach, through a corporate improvement programme, which engages all relevant stakeholders.

7.    MANAGEMENT OF RISK

Management of Risk will be monitored and reported by the Senior Information Risk Officer (SIRO) and Corporate Management Team on a quarterly basis.

8.    BACKGROUND PAPERS
Public Records (Scotland) Act 2011
Corporate Information Management Strategy

9.    REPORT AUTHOR DETAILS
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