



INFORMATION AND RECORDS MANAGEMENT POLICY

Policy Summary

This policy aims to ensure a consistent approach is taken to information and records management across the Council and defines the framework by which information held by the Council is managed. It sets out how the Council will manage its records in accordance with its Records Management Plan and supports the Council to meet legislative and regulatory obligations.

Policy Status	Approved and finalised by the committee on 06/03/2025
Responsible Officer	Christine Brooks, Information Governance Officer, Information Governance Team.
Policy Sponsor	Rob Simpson, Director, Business Services.
Authorised By	Business Services Committee
Policy Review Date	06/03/2030

1. Policy Statement

Aberdeenshire Council ('the Council') recognises information as a vital corporate asset that must be managed properly to support collaborative working, effective decision making, and the Council's vision and objectives for our places.

Information supports the Council's place-based approach and effective information and records management leads to improvements in the use of information within the organisation.

This brings tangible benefits to the Council and our communities in the use of financial, human and other resources.

Effective and efficient information and records management also supports the Council to meet its legislative and regulatory obligations.

Information and records management supports the Council to comply with the Council's obligations under the Freedom of Information (Scotland) Act 2002, the Environmental Information (Scotland) Regulations 2004, and other information rights legislation such as the UK General Data Protection Regulation.

The purpose of this policy is to provide a mandate for the information and records management function within the Council and to define the framework by which information held by the Council is managed in compliance with legislation and according to clearly defined procedures and controls. These procedures and controls govern information and



records held by Aberdeenshire Council throughout their whole life cycle, regardless of format.

This will ensure that information is available to conduct business efficiently, make fully informed decisions, collaborate effectively, and deliver essential local services and additional help to those who need it most in our communities across Aberdeenshire.

Aberdeenshire Council complies with the laws governing information and records managements and aims to operate in accordance with best practice.

This policy and the Council's records management guidance and procedures have been developed considering the legislative and regulatory framework, along with best practice standards and requirements.

This policy should be read in conjunction with the records management procedures and guidance which define how to manage the Council's records, as well as the Data Protection Policy and Information Security Policy.

It must be read in conjunction with the Council's Records Management Plan. The Records Management Plan has been developed in line with the Council's obligations under the Public Records (Scotland) Act 2011. The Records Management Plan sets out the Council's arrangements for the management of its public records and is reviewed annually.

2. Scope of Policy

This policy applies to all Council information and records regardless of where they are stored and/ or used.

This includes physical and digital environments directly controlled by the Council. It also includes, for example, home working locations, mobile working locations, and off-site physical records storage locations.

This policy applies to all information and records, irrespective of format or the technology used to create and store them, which have been created, received, processed and stored by the Council whilst conducting its business and delivering services both in house and off site.

This policy applies to all Council services and their employees, agency staff, elected members, contractors, consultants, volunteers, third parties and anyone who creates, captures or maintains records relating to Council functions irrespective of location.

3. Responsibilities

3.1 Employee and elected members

All employees and elected members are responsible for the proper management of the information and records they create, use or maintain and their management from creation to disposal.

All employees and elected members must recognise that records management is everybody's responsibility. It is the responsibility of all employees and elected members to



follow and apply this policy and relevant procedures, practices and guidance as part of everyday working practice.

3.2 Senior Management

The Director of Business Services is the Senior Information Risk Owner and has senior management responsibility for records management.

Directors and Chief Officers are responsible for fully implementing the Records Management Plan within their Service.

Heads of Service are responsible for ensuring their employees and any relevant third parties including contractors and suppliers, comply with this policy and the relevant procedures, practices and guidance as part of everyday working practice.

The Head of Legal and People is authorised to prepare and implement a Records Management Plan which sets out the proper arrangements for the management of Council records in accordance with the Public Records (Scotland) Act 2011 and the Local Government etc. (Scotland) Act 1994.

3.3 Operational responsibility

The Information Governance Officer is responsible for day-to-day management of the Council's performance of the statutory tasks as set out in the Public Records (Scotland) Act 2011. They are responsible for monitoring and reviewing the Council's Records Management Plan and all other related documentation.

The Information Governance Officer acts as the Council's first point of contact for the Keeper of the Records of Scotland and the National Records of Scotland in relation to records management and all aspects of the Council's Records Management Plan.

3.4 Information Governance Group

The Information Governance Group oversees operational aspects of information governance, including records management, across the Council.

The Information Governance Group ensures a corporate approach to information and records management is adopted across the Council.

The Information Governance Group is responsible for oversight of the continued assessment and review of the Records Management Plan.

3.5 Information Governance Board

The Information Governance Board, chaired by the Senior Information Risk Owner, provides strategic leadership and maintains oversight of information governance arrangements within the Council, including compliance with the Council's records management responsibilities under legislation.



3.6 Third parties

It is the responsibility of all third parties performing a function for the Council to comply with this policy and all relevant procedures, practices and guidance.

4. Policy Principles

Aberdeenshire Council recognises the importance of managing records effectively and is committed to the continuous improvement of its information and records management practices.

The Information and Records Management Policy will ensure a consistent approach is taken to information and records management across the Council.

4.1 Business Classification

Records will be known and identified within the functional structure of the business classification scheme. This will allow records to be categorised according to the business of the Council.

The classification of records helps the Council know what information it holds and supports access, retrieval, processing, and preservation of records. Classification can be applied via a structure or metadata.

4.2 Naming conventions

Records must be named appropriately according to the file naming conventions available to staff on the Council's intranet. Where local variation is identified by Services, the variation must be agreed with the Information Governance Officer and published on the Council's intranet.

Naming files consistently, logically and in a predictable way clearly distinguishes similar files from one another, and by doing so, facilitates the storage, search and retrieval of files more effectively.

4.3 Retention schedules

Records must be retained and disposed of in accordance with the retention schedules. Aberdeenshire Council has adopted the Scottish Council on Archives Record Retention Schedules (SCARRS) as the basis for its retention periods and disposal actions.

Records must be disposed of in accordance with the retention periods and disposal actions listed in SCARRS. Where local variation is identified by Services, for example, due to business need, the variation must be agreed with the Information Governance Officer and published on the Council's intranet.



4.4 Destruction arrangements

Records must be destroyed in accordance with the retention schedules in a timely and appropriate manner and records of their destruction must be maintained. Destruction logs should be kept indefinitely by the Services.

4.5 Archiving and transfer arrangements

Records that have enduring corporate, legal, historical, cultural or research value must be permanently retained and made accessible in accordance with information legislation and regulation.

Records suitable for permanent preservation are identified in the retention schedules.

At the end of their active business use these records must be transferred to the Archive Service following the transfer procedure.

4.6 Business continuity and vital records

Some records are vital to core business activities and the function of the Council.

These vital records must be identified as part of business continuity planning, and services must ensure that the critical business activities referred to in their vital records will be able to continue in the event of a disaster.

4.7 Audit trail

The location of records must be known, and changes recorded. Changes include movement of records even if the information content is unaffected. Audit trail information must be kept for at least as long as the record to which it relates.

Audit trail information can be held separately from or as an integral part of the record. It may be generated automatically, or it may be created manually.

Audit trail information must be kept for all records regardless of format. Version control should be used where possible.

4.8 Records management training

All staff creating or otherwise processing records must undertake records management training available on the e-learning platform. Training should be undertaken within three months of starting employment, and every two years thereafter.

All staff requiring access to The Aberdeenshire's Records Centre (The ARC) must have completed both the records management training and The ARC specific training prior to using The ARC.

Staff and elected members must be supported to undertake training and maintain their knowledge to a level commensurate with their role. Professional record keeping staff must be supported to maintain involvement in Continuous Professional Development schemes.



All new employees must be made aware of this policy, their record management responsibilities and the related training requirements through the induction process.

4.9 Assessment and review

The Records Management Plan and the records management arrangements therein must be regularly reviewed to ensure they remain fit for purpose.

Updates to the National Records of Scotland on progress and changes to the Records Management Plan are provided by the Information Governance Officer.

4.10 Public records created by third parties

Records created by or on behalf of a contractor carrying out the functions of the Council, including records that have come into the possession of the Council or the contractor in carrying out the functions of the Council are public records.

These records must be managed to the satisfaction of the Council. Adequate arrangements must be established through contractual clauses and monitoring procedures. The Council must be able to evidence that corporate and operational responsibility for records management within third parties is robust.

5. Supporting Policies and Documents

[Aberdeenshire Council and Aberdeenshire Licensing Boards Records Management Plan](#)

[Information Strategy](#)

[Data Protection Policy](#)

Information Security Policy

Information and Records Management Guidance



6. Council Strategic Priorities

Pillar	Priority	How does the policy reflect the Council's strategic Priorities?
A sustainable economy	We will support a strong and diverse economy by attracting people of working age to our region, complementing our highly skilled local workforce.	Effective information and records management supports the delivery of all the Council's Strategic Priorities .
Connected communities	We will work with communities and partners to enhance the sense of connection among our places. This includes supporting communities to come up with innovative solutions to ensure our places are resilient and vibrant.	
Living well locally	We will encourage and support our residents to lead healthy and active lives and contribute meaningfully to their communities. We will make proactive choices that will allow us to cater to the needs of our increasingly ageing population.	

7. Policy Revision

Version Number	Revision Date	Committee Approval Date	Summary of Changes
v1.0	n/a	19 September 2013	Information Management Policy – approved by Policy & Resource Committee.
v1.05	28 January 2025	n/a	Draft Information and Records Management Policy transferred to current policy template.
v2.0	6 March 2025	6 March 2025	Information and Records Management Policy approved.
v2.01	7 July 2025	n/a	Transferred to current policy template – format changes to policy summary section to improve accessibility.
v2.1	26 November 2025	n/a	Transferred to current policy template. Policy summary added to page 1.



8. Policy Distribution

Name	Designation	Organisation
The policy and supporting documentation will be available on the Aberdeenshire Council intranet and the policy published on the Aberdeenshire Council website.		

[ENDS]