

## File Planning Principles

### East Lothian Council

#### What is a File Plan?

A File Plan is an agreed folder structure that is used to organise records of Council business. It can apply to any quantity of records, from a few folders to the entirety of Council records.

File Plans are essential to finding records quickly and easily, and reducing unnecessary duplication. They make our jobs easier, and save staff time and money. They also support our compliance with information legislation, including the Freedom of Information (Scotland) Act (FOI or FOISA), the Environmental Information (Scotland) Regulations (EIRs or EISRs) and the Data Protection Act (DPA2018). All of these laws have mandatory timescales for providing information to people who request it, and we are required to provide this information on time or face penalties, even if the information is difficult to find or retrieve.

#### Scope

This guidance addresses the high-level principles that should be considered by all staff when creating a system for organising records. It is not a prescriptive list of specific rules, but rather guidelines that should shape your approach. The Principles have a greater focus on digital recordkeeping, however they can apply to paper filing systems as well.

#### Principles

##### 1. Function, not ownership.

Organisational structures change over time. When filing structures are defined by the business functions they evidence, and not the person or team that created the files, it is more likely that the File Plan will remain relevant over time.

Not all files can be organised purely by function, for example Employee Files and other records used by managers as part of day-to-day team management. These folders need to have security restrictions that map to the Council's organisational structure, so that more senior managers have access to records owned by less senior staff.

The goal is to achieve a balance between a functional structure and security restrictions, so that the File Plan remains as useful as possible over time.

##### 2. Identify your 'golden records'.

Particularly in the context of digital records, it is common for multiple copies of a document to be created and shared over the course of its life cycle. You need to identify which documents are the official and authoritative 'golden records', and which documents are disposable copies. Golden records are the files which need to be stored and managed according to official records management procedures. The File Plan should contain primarily the golden records, although you will need to ensure that you have procedures in place for the secure disposal of non-golden copies. Generally speaking, non-golden copies should be securely destroyed as soon as they are no longer in immediate use.

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### 3. Keep the number of levels to a minimum

As a general rule, you should be able to get to the file you need within 3-4 levels of the filing structure. To keep the File Plan as 'flat' as possible, you may need to keep a large number of individual documents within a single folder. This means that you will need to be strict in enforcing your naming convention, so that files appear in a predictable and readily accessible order.

### 4. Avoid repetition

The context of an individual file should be clear due to its place in the File Plan. You should not repeat folder names within the same File Plan; instead, reconsider your structure and look at reducing the number of levels.

### 5. No personal names

Personal names of staff should never be used to organise records of Council business, for example, 'Jim's files'. Using personal names in a File Plan makes it highly challenging to access relevant records and information when that member of staff moves on. Remember – we have a statutory obligation to provide access to our recorded information, even if it's difficult to find.

The only exception to this principle is where individuals need to keep personal information that relates to them only in their employment within the Council. In these circumstances, it is permissible to store these records on individual Z: drives.

Personal, non-Council-related records should never be stored on Council systems at any time.

### 6. Use the Retention Schedule

The Retention Schedule sets out all of the types of records created and/or used in the course of Council business. It provides rules for how long records should be kept, and gives instructions for what should be done with them at the end of their 'lives'.

In most (but not all) cases, if you have structured your File Plan based on business activities and functions, it should be straightforward to apply retention rules to folders in your File Plan. Likewise, if you need inspiration regarding how to structure your File Plan, it can be useful to refer to the Retention Schedule for a prompt.

### 7. Nominate key staff to manage the File Plan

In order to remain relevant, the File Plan needs to be continuously monitored and reviewed to ensure that it is being maintained, particularly as staff leave the organisation and new staff come in. The best way to ensure this is to nominate a key member of the team to control folder creation, permissions and file naming.

You might find it helpful to lock down folder creation, with only the key staff able to create new folders for the team. For further guidance on how to do this, contact the IT Service Desk.

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