

**The Public Records (Scotland) Act 2011**

**Renfrewshire Valuation Joint Board**

**Progress Update Review (PUR) Final Report by the PRSA Assessment Team**

**1 August 2018**

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## 1. Public Records (Scotland) Act 2011

The Public Records (Scotland) Act 2011 (the Act) received Royal Assent on 20 April 2011. It is the first new public records legislation in Scotland since 1937 and came into force on 1 January 2013. Its primary aim is to promote efficient and accountable record keeping by named Scottish public authorities.

The Act has its origins in *The Historical Abuse Systemic Review: Residential Schools and Children's Homes in Scotland 1950-1995* (The Shaw Report) published in 2007. The Shaw Report recorded how its investigations were hampered by poor recordkeeping and found that thousands of records had been created, but were then lost due to an inadequate legislative framework and poor records management. Crucially, it demonstrated how former residents of children's homes were denied access to information about their formative years. The Shaw Report demonstrated that management of records in all formats (paper and electronic) is not just a bureaucratic process, but central to good governance and should not be ignored. A follow-up review of public records legislation by the Keeper of the Records of Scotland (the Keeper) found further evidence of poor records management across the public sector. This resulted in the passage of the Act by the Scottish Parliament in March 2011.

The Act requires a named authority to prepare and implement a records management plan (RMP) which must set out proper arrangements for the management of its records. A plan must clearly describe the way the authority cares for the records that it creates, in any format, whilst carrying out its business activities. The RMP must be agreed with the Keeper and regularly reviewed.

## 2. Progress Update Review (PUR) Mechanism

Under section 5(1) & (2) of the Act the Keeper may only require a review of an authority's agreed RMP to be undertaken not earlier than five years after the date on which the authority's RMP was last agreed. Regardless of whether an authority has successfully achieved its goals identified in its RMP or continues to work towards them, the minimum period of five years before the Keeper can require a review of a RMP does not allow for continuous progress to be captured and recognised.

The success of the Act to date is attributable to a large degree to meaningful communication between the Keeper, the Assessment Team, and named public authorities. Consultation with Key Contacts has highlighted the desirability of a mechanism to facilitate regular, constructive dialogue between stakeholders and the Assessment Team. Many authorities have themselves recognised that such regular communication is necessary to keep their agreed plans up to date following inevitable organisational change. Following meetings between authorities and the Assessment Team, a reporting mechanism through which progress and local initiatives can be acknowledged and reviewed by the Assessment Team was proposed. Key Contacts have expressed the hope that through submission of regular updates, the momentum generated by the Act can continue to be sustained at all levels within authorities.

The PUR self-assessment review mechanism was developed in collaboration with stakeholders and was formally announced in the Keeper's Annual Report published on 12 August 2016. The completion of the PUR process enables authorities to be credited for the progress they are effecting and to receive constructive advice concerning on-going developments. Engaging with this mechanism will not only maintain the spirit of the Act by encouraging senior management to recognise the need for good records management practices, but will also help authorities comply with their statutory obligation under section 5(1)(a) of the Act to keep their RMP under review.

### 3. Executive Summary

This Final Report sets out the findings of the Public Records (Scotland) Act 2011 (the Act) Assessment Team's consideration of the Progress Update template submitted for the **Renfrewshire Valuation Joint Board**. The outcome of the assessment and relevant feedback can be found under sections 6 – 8.

### 4. Authority Background

Renfrewshire Valuation Joint Board was established by the Valuation Joint Boards (Scotland) Order 1995 to carry out the valuation functions of Renfrewshire, East Renfrewshire and Inverclyde Councils.

It came into existence on 1 April 1996 and was also given the responsibility of carrying out Electoral Registration on behalf of the three constituent authorities.

The composition of the membership of the Board is determined by the above Order and consists of 8 Councillors representing Renfrewshire Council and 4 each representing East Renfrewshire and Inverclyde Councils.

<http://www.renfrewshire-vjb.gov.uk/>

### 5. Assessment Process

A PUR submission is evaluated by the Act's Assessment Team. The self-assessment process invites authorities to complete a template and send it to the Assessment Team one year after the date of agreement of its RMP and every year thereafter. The self-assessment template highlights where an authority's plan achieved agreement on an improvement basis and invites updates under those 'Amber' elements. However, it also provides an opportunity for authorities not simply to report on progress against improvements, but to comment on any new initiatives, highlight innovations, or record changes to existing arrangements under those elements that had attracted an initial 'Green' score in their original RMP submission.

The assessment report considers statements made by an authority under the elements of its agreed Plan that included improvement models. It reflects any changes and/or progress made towards achieving full compliance in those areas where

agreement under improvement was made in the Keeper's Assessment Report of their RMP. The PUR assessment report also considers statements of further progress made in elements already compliant under the Act.

Engagement with the PUR mechanism for assessment cannot alter the Keeper's Assessment Report of an authority's agreed RMP or any RAG assessment within it. Instead the PUR Final Report records the Assessment Team's evaluation of the submission and its opinion on the progress being made by the authority since agreeing its RMP. The team's assessment provides an informal indication of what marking an authority could expect should it submit a revised RMP to the Keeper under the Act, although such assessment is made without prejudice to the Keeper's right to adopt a different marking at that stage.

**Key:**

G	The Assessment Team agrees this element of an authority's plan.		A	The Assessment Team agrees this element of an authority's progress update submission as an 'improvement model'. This means that they are convinced of the authority's commitment to closing a gap in provision. They will request that they are updated as work on this element progresses.		R	There is a serious gap in provision for this element with no clear explanation of how this will be addressed. The Assessment Team may choose to notify the Keeper on this basis.
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**Progress Update Review (PUR) Template: Renfrewshire Valuation Joint Board**

Element	Status of elements under agreed Plan, January 2016	Status of evidence under agreed Plan, January 2016	Progress assessment status, 2018	Keeper's Report Comments on Authority's Plan, January 2016	Self-assessment Update as submitted by the Authority since January 2016	Progress Review Comment, 2018
1. Senior Officer	<b>G</b>	<b>G</b>	<b>G</b>	Update required on any change	Since the Plan was agreed with the Keeper in 2016, the senior officer has changed to Kate Crawford who is the Assessor for Renfrewshire Valuation Joint Board. The change of personnel was intimated to NRS by email on 15th June 2017.	This updated information is noted with thanks.
2. Records Manager	<b>G</b>	<b>G</b>	<b>G</b>	Update required on any change	With effect from 1st June 2018, the Records Manager is Lindsey Hendry who has now operational responsibility for Corporate Governance within RVJB	This updated information is noted with thanks.
3. Policy	<b>G</b>	<b>G</b>	<b>G</b>	Update required on any change	With the installation of our Electronic Document Management System (EDMS) in November 2017, the Governance Working	This update is noted with thanks. It is positive to see continuing developments of the policy in response to practical changes and

					Group is currently in the process of finalising the review of the Records Management Policy and this will be rolled out to staff when the review is completed.	improvements. Ensuring that staff are aware of changes is, of course, good practice.
4. Business Classification	<b>G</b>	<b>G</b>	<b>G</b>	Update required on any change	As a result of the installation of our EDMS - Laserfiche, the Governance Working Group is currently reviewing this document as the first stage of its installation was to use it for all mail with the second stage being the process of migrating all our data stored on network shares to our EDMS.	The review of the Business Classification Scheme following its application through the new EDMS is a logical and sensible approach, as is the gradual roll-out of the EDMS itself. The Assessment Team would be interested to hear how this develops in future PURs.
5. Retention Schedule	<b>G</b>	<b>G</b>	<b>G</b>	Update required on any change	Again as a result of the installation of our EDMS, a review of our Retention Schedule is currently being undertaken by the Governance Working Group. Each category on our retention schedule has a specific retention period linked to the data and this retention period will be built into our EDMS based on the	Moving to a new system is an opportune time for a careful review of the existing Retention Schedules to ensure that they are up to date, take account of any legislative changes and are generally fit for purpose. Aligning this with a back scanning project is resource-intensive and it is very positive to see that the full

					<p>categorisation of the document within Laserfiche. We are currently back scanning all our domestic files and each document within a property file is being categorised as per the retention schedule which will ensure we are managing our electronic records appropriately.</p>	<p>implications of this are being thoroughly considered to ensure that the scanned and born digital records are well managed and that the retention schedules are applied as the records are added to the system or created within it.</p>
6. Destruction Arrangements	A	G	A	<p>The Board recognises the importance of the secure and irretrievable destruction of records and has supplied their <i>Protective Marking Handling Disposal Policy &amp; Procedures</i> document as evidence. However, the processes by which electronic records will be destroyed will form part of another policy which has not yet been rolled-out. The Keeper requests that this policy is forwarded to him as soon as it becomes available in order that he may keep the Board's submission up-to-date.</p> <p>The Board is also considering incorporating the automated</p>	<p>RVJB recognised the importance of the timeous destruction of its electronic records to complement the existing procedures in place for the destruction of its paper records, hardware and back-ups and therefore one of the first business decisions of the new Senior Officer was to purchase the EDMS - Laserfiche, which had a robust archiving system. As previously mentioned, Laserfiche Workflow will run at the end of each month to identify the documents that meet the retention criteria as noted in RVJB's retention schedule.</p>	<p>The authority is making progress towards full utilisation of the potential of the EDMS. The gradual staged implementation of EDMS with the planned migration at a later stage of existing born digital data and the inclusion of scanned records is a sensible approach. The EDMS chosen clearly has the capability to provide appropriate deletion of records and appears to enable intervention to retain records scheduled for destruction, which is good practice. Once this system has been</p>

				<p>disposal of electronic records within their IT system. Whilst this must remain a business decision for the Board, the Keeper commends this initiative and asks that he be kept informed and supplied with details should a decision be taken.</p> <p>The Keeper agrees that Renfrewshire Valuation Joint Board has procedures in place to suitable destroy paper records, hardware and back-ups when appropriate, as required by the Act. He agrees this element of the Plan on 'improvement model' terms on the condition that the Board pursues the creation of a policy detailing the management (including deletion) of electronic records as committed to on page 12 of the Plan.</p>	<p>Laserfiche Workflow will send a link to the folder where the documents are that have met their expiry date as listed on the retention schedule. Documents can then either be deleted using the metadata fields in the document template or retained. When documents meet their retention criteria they will be emailed to retention_dms@renfrewshire.gov.uk for review and deletion/retention. Deleted documents are deleted from Laserfiche and moved to the recycle bin where they are then purged. As a result of the installation of Laserfiche, the policy governing the Electronic Management of Records is currently being finalised by the Governance Working Group. This will be rolled out to staff prior to the second stage of the installation - the migration of all our data stored on network shares to the EDMS</p>	<p>fully implemented and evidence of this provided, it is likely that this would enable the RAG status for this Element to move from Amber to Green.</p>
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7. Archiving and Transfer	<b>G</b>	<b>G</b>	<b>G</b>	Update required on any change	This remains unchanged	No immediate action required. Update required on any future change.
8. Information Security	<b>G</b>	<b>G</b>	<b>G</b>	Update required on any change	To ensure continued compliance with Data Protection legislation, it is mandatory for all staff to complete an online training course each year provided by our lead authority. In addition our Data Protection Officer (DPO), who has only recently been appointed by RVJB, will provide adhoc information governance training throughout the year.	Annual training of all staff is good practice in an authority which handles confidential and personal information as a matter of course. Additional training in all aspects of information governance is welcome as it ensures that the existing high standard of information security is maintained. This update is noted with thanks.
9. Data Protection	<b>G</b>	<b>G</b>	<b>G</b>	Update required on any change	The Records Manager is currently reviewing all policies and documents relating to data protection to ensure compliance with data protection legislation. The Records Manager successfully completed the GDPR Practitioner Certificate in May 2018 and all staff had to complete a GDPR online course provided by our lead authority prior to the 25th May 2018. Staff also have to	This update is noted with thanks. The authority clearly takes its obligations under Data Protection seriously and is to be commended for supporting its staff in developing a high level of competence in this area. Annual training ensures that staff are kept up to date with any changes in the legislation and any lessons learned from the wider sector. Valuation Joint Boards are a small, discrete specialism and

					complete a mandatory Data Protection course annually. Our DPO will supplement this by delivering adhoc data protection training to ensure continued compliance. In conjunction with the Scottish Assessors Association, we have completed an Information Asset Register and this is currently being reviewed by our DPO. We also have published privacy information on our website as well as the Scottish Assessors Association's Portal.	collaboration through the Scottish Assessors Association on data protection and records generally is encouraged and welcomed
10. Business Continuity and Vital Records	<b>A</b>	<b>G</b>	<b>A</b>	The Board has not yet adopted the formal <i>Business Continuity Plan</i> which at the time of the assessment is described as 'currently being finalised by the Internal Governance Working Group'. A separate <i>IT Disaster Recovery Plan</i> has also been created and awaits final sign-off. The Keeper welcomes creation of these policies and asks that he has sight of them once approved and operational.	Following the installation of Microsoft 365 in November 2017, email traffic is now supported by Microsoft. Further developments to our internal network, including the introduction of virtual servers, which combined with appropriate offsite storage and replication will allow for a more seamless recovery of IT services should a disaster arise. However one remaining	Moving data to a different host is a business matter for the authority. The authority is clearly considering the risks to its data and exploring robust methods of the recovery of data in event of loss and damage whether from malicious attack, obsolescence or accident. The progress is this Element is very encouraging and while it is not yet at the stage of being likely to achieve a

				<p>The Keeper agrees this element of the Renfrewshire Valuation Joint Board's records management plan under 'improvement model' terms. This means that he recognises that an authority has acknowledged a gap in provision (two vital business continuity policies have not yet been approved) but have put processes in place to close that gap. The Keeper's agreement is conditional of him being provided with fully authorised policy documents as soon as they are available.</p>	<p>issue is the back up for the Progress Server which is housed in Renfrewshire Council's property. This is still being investigated by Renfrewshire Council's ICT department as part of their Disaster Recovery Plan. Once this has been confirmed by the Council, the Business Continuity Plan and the IT Disaster Recovery Plan will be completed and signed by the Management Team with reviews of these procedures built in to the plans. In addition RVJB's IT department have scheduled meetings with Microsoft's Azure team to discuss the possibility of moving RVJB's data centre to their hosted data centre through Azure IAAS. This would lead to a more robust Disaster Recovery Plan through the use of Azure's facilities and technologies on offer</p>	<p>Green rating, it is clear that the authority is working hard towards this.</p>
	<b>A</b>	<b>G</b>	<b>G</b>	The Board recognise that	The Governance Working	The authority has provided

11. Audit Trail				<p>whilst audit trail functionality is available for electronic records, procedures regarding paper records need to be developed and a logging out sheet will need to be created. These action points will be added to the Internal Governance Working Group's remit. The Keeper is pleased to see the Board's commitment to close the gap in provision under this element and asks for updates as work in this area progresses.</p> <p>The Keeper agrees this element of Renfrewshire Valuation Joint Board's records management plan under 'improvement model' terms. This means that the authority has acknowledged a gap in provision (movement of paper records is inadequately tracked) and has made a commitment to implement a process that will close that gap. The Keeper's agreement is conditional on him being updated as this project progresses.</p>	<p>Group recognised the need to implement the tracking of paper records. In July 2016, a "Log In/Out" sheet was rolled out to all staff and this sheet has to be completed when a file is removed from a filing cabinet. We are currently back scanning on to Laserfiche all our domestic property files and on completion of this, we will complete the scanning of our non-domestic files. Once we have appropriate safeguards in place for our disaster recovery, the paper files will be disposed of securely thereby removing the necessity of a "Log In/Out" Sheet.</p>	<p>the Log In/Log out sheet as evidence of this straightforward procedure. The implementation of this procedure enables the authority to have more assurance that paper records are less likely to be lost or mislaid during normal working access. The move to an electronic record-keeping environment is a business decision for the authority: it is clear from the information in Elements 5, 6 and 10 that the authority is mindful of the whole range of interconnected records management processes in making this decision. The tracking system devised is a sensible approach given that the paper records will be destroyed once the authority is ready to use only electronic record-keeping. If this were a statutory assessment, the evidence seen by the Assessment Team would be likely to change the RAG status for this element to Green.</p>
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12. Competency Framework	<b>G</b>	<b>G</b>	<b>G</b>	The Board recognise that staff require further training on the operation of the retention schedule. There is a commitment to providing staff with a 'clear set of rules'. The Keeper commends this commitment and requests a copy of these rules when they become available.	Once the Electronic Management of Records Policy and the amendments to the Retention Schedule/Business Classification Scheme, have been approved by the Governance Working Group, these documents and the related training will be rolled out to staff.	The commitment to staff development is clear from the information provided for Elements 8 and 9 and the concentration on Data Protection in the lead up to GDPR and the new Data Protection Act is a practical use of resources. As a small authority, the support given to enable the professional development of the named Records Manager is commendable. The authority clearly recognises the benefit of managing its records well.
13. Assessment and Review	<b>G</b>	<b>G</b>	<b>G</b>	The Board is committed to regular reviews of its Plan and have set a provisional date for undertaking the first such self-assessment by October 2016. There are similar plans to review key policies and there will be a constant review of the Business Classification Scheme and Retention Schedule during their implementation. The Keeper applauds these commitments	RVJB's Records Management Plan was reviewed in October 2016 and amendments made to reflect any changes to the operation of the management of records. It is a living document and also a standing agenda item on the monthly Governance Working Group meetings. Other standing agenda items are the Records	This method of continuous review of the Records Management Plan and the associated policies and procedures is best practice and the authority is to be commended for this thorough approach. The submission of this PUR also demonstrates full compliance with the statutory requirement to keep the authority's Records Management Plan under

				and asks that he is kept informed of these self-assessments, particularly if they result in new policy documents or procedures being introduced.	Management Policy, Business Classification Scheme, Retention Schedule, Data Protection, FOI, Business Continuity Plan etc. The minutes of these meetings are also presented at the monthly Senior Management Team meetings.	review and this evidence is very welcome
14. Shared Information	<b>G</b>	<b>G</b>	<b>G</b>	Update required on any change	All RVJB's Data Sharing/Processor Agreements are currently being reviewed by the Governance Working Group in conjunction with our DPO to ensure compliance with data protection legislation.	This update is noted with thanks. The Assessment Team would be interested in how this develops and looks forward to further information in future PURs.

### Version

The progress update submission which has been assessed is the one received by the Assessment Team on 27 June 2018. The author of the progress update submission is Lindsey Hendry, Assistant Assessor and Electoral Registration Officer who is named as the Records Manager.

The progress update submission makes it clear that it is a submission for the **Renfrewshire Valuation Joint Board**.

### 7. PRSA Assessment Team's Summary

The Assessment Team has reviewed the **Renfrewshire Valuation Joint Board** Progress Update submission and agrees that the proper record management arrangements outlined by the fourteen elements in the authority's plan continue to be properly considered. The Assessment Team commends this authority's efforts to keep its Records Management Plan under review.

## General Comments

Renfrewshire Joint Valuation Board clearly continues to take its records management obligations seriously and is working hard to bring all elements into full compliance. Considerable resources have been invested in a thoughtful consideration of how to move forward with all the required elements of the Records Management Plan. The business decision to install an Electronic Document Management System (EDMS) has been accompanied by a review of retention schedules, a scanning programme, reviews of policies and procedures and planned development of appropriate staff training. All this demonstrates that the authority recognises the benefits of best practice in records management and has an excellent strategic direction for its work coupled with support for practical operational decisions. In particular the commitment to the professional development of the named Records Manager in all aspects of record-keeping is very welcome.

Although there is still a certain amount of work to be done in Elements 6 and 10, the authority is very close to completing this and the steady approach to this is welcome. The Assessment Team would be glad to see further development in due course.

The Keeper cannot change the status of elements formally agreed under a voluntary submission, but he can use such submissions to indicate how he might now regard this status should the authority choose to resubmitted it plan under section (5)(6) of the Act. The authority has provided evidence of progress under Element 11 and it is likely that at a statutory review of the Records Management Plan this Element would achieve a Green rating.

The Team commends the progress evident in this work and would welcome updates on these projects in future PUR submissions.

Where 'no change' has been recorded under the update on provision by the authority, the Assessment Team is happy to agree that these elements require no further action for the time being.

## 8. PRSA Assessment Team's Evaluation

Based on the progress update assessment the Assessment Team considers that the **Renfrewshire Valuation Joint Board** continue to take their statutory obligations seriously and are working hard to bring all the elements of their records management arrangements into full compliance with the Act and fulfil the Keeper's expectations.

- The Assessment Team recommends authorities consider publishing PUR assessment reports on their websites as an example of continued good practice both within individual authorities and across the sector.

This report follows the Public Records (Scotland) Act Assessment Team's review carried out by,



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**Elsbeth Reid**  
Public Records Officer