

PUBLIC RECORDS (SCOTLAND) ACT 2011

**Report on the Progress Update
Review (PUR) submitted by
Renfrewshire Valuation Joint Board
on 8th April 2026**

19th May 2026

Table of Contents

1.	Progress Update Review (PUR) Mechanism	3
2.	Accessing Past Reports	4
3.	Progress Update on the Model Plan Elements	5
3.1	Element 1: Senior management responsibility	5
3.2	Element 2: Records manager responsibility	6
3.3	Element 3: Records management policy statement	7
3.4	Element 4: Business classification	8
3.5	Element 5: Retention schedules	9
3.6	Element 6: Destruction arrangements	10
3.7	Element 7: Archiving and transfer arrangements	11
3.8	Element 8: Information security	12
3.9	Element 9: Data Protection	13
3.10	Element 10: Business continuity and vital records	14
3.11	Element 11: Audit trail	15
3.12	Element 12: Records management training for staff	16
3.13	Element 13: Assessment and review	17
3.14	Element 14: Shared information	18
3.15	Element 15: Public records created by third parties	19
4.	PRSA Implementation Team's Summary	20

1. Progress Update Review (PUR) Mechanism

Progress Update Reviews (PUR) are optional and allow named authorities to submit an update to the [Public Records \(Scotland\) Act 2011](#) (PRSA) Implementation Team. They support the implementation of PRSA which promotes efficient and accountable record keeping by named Scottish public authorities. Visit the National Records of Scotland (NRS) website for [up to date guidance on PURs](#). You can read more about the role of the PRSA Implementation Team on the [National Records of Scotland website](#).

Please do not send evidence along with the PUR as it will not be considered.

Each Element is given a Red — Amber — Green (RAG) status rating as follows:

RAG status rating: Red

There is a serious gap in provision for this element with no clear explanation of how this will be addressed. If this were an RMP the Keeper may choose to return it, without agreement, on this basis.

RAG status rating: Amber

If this were an RMP the Keeper would consider agreeing this element under an 'improvement model'. This means that the Authority demonstrates an ongoing commitment to closing a gap in provision.

RAG status rating: Green

If this were an RMP the Keeper would consider agreeing this element of an authority's RMP.

The PRSA Implementation Team's review of the completed PUR template does not change the formal RAG status of an authority's agreed RMP Assessment Report.

2. Accessing Past Reports

Previous RMP assessment reports can be accessed as follows:

- Visit the National Records of Scotland (NRS) web archive for [Records Management Plan Assessment Reports to December 2024](#). Then search for your authority's report by using the alphabetical table.
- Visit the NRS website for [Records Management Plan Assessment Reports agreed after December 2024](#). On the left-hand side, under publication title, enter the name of your authority; under publications topic, select 'Records and archives'; under publications type, select 'Public Records (Scotland) Act'.

If your authority has previously participated in PURs, finalised PUR reports can be accessed as follows.

- Visit the NRS web archive for [Progress Update Review Reports to December 2024](#). Then search for your authority's report by using the alphabetical table.
- Visit the NRS website for [Progress Update Review Reports after December 2024](#). On the left-hand side, under publication title, enter the name of your authority; under publications topic, select 'Records and archives'; under publications type select 'Public Records (Scotland) Act'.

3. Progress Update on the Model Plan Elements

3.1 Element 1: Senior management responsibility

PRSA section 1(2)(a)(i) states that authorities must identify the individual who is responsible for management of the authority's public records. An individual senior staff member must be identified as holding corporate responsibility for records management.

RAG status rating: Green

3.1.1 Self-assessment Update

No change.

3.1.2 Progress Review Comments

No immediate action required. Update requested on any future change.

3.2 Element 2: Records manager responsibility

Section 1(2)(a)(ii) of PRSA specifically requires a RMP to identify the individual responsible for ensuring the authority complies with its plan. An individual staff member must be identified as holding operational responsibility for records management and has appropriate corporate responsibility, access to resources, and skills.

RAG status rating: Green

3.2.1 Self-assessment Update

No change.

3.2.2 Progress Review Comments

No immediate action required. Update requested on any future change.

3.3 Element 3: Records management policy statement

The Keeper requires each authority's plan to include a records management policy statement. The policy statement should describe how the authority creates and manages authentic, reliable and useable records, capable of supporting business functions and activities for as long as they are required. The policy statement should be made available to all staff, at all levels in the authority.

RAG status rating: Green

3.3.1 Self-assessment Update

The Records Management Policy was reviewed and updated in April 2025, in line with the two-yearly review schedule.

The main issue for consideration at the time of review was whether a separate Policy for Management of Electronic Records was required. On careful review, it was considered that it was important to ensure that all Policy relating to Records Management is in one place for staff. The minor updates ensured that management and retention of electronic documents is covered adequately in the existing Records Management Policy. A copy of the updated Records Management Policy was circulated to all staff together with an explanation of the essential principles of the Policy.

A copy of the Records Management Policy is included in the PUR response for the Keeper to have sight of the Policy.

3.3.2 Progress Review Comments

Thank you for this update. In the Keeper's original agreement it was noted that RVJB had indicated a process for ensuring that relevant information governance policies are kept under review. It is welcome to see confirmation that this is being appropriately pursued.

The Keeper's PRSA Implementation Team acknowledges receipt of the RVJB Records Management Policy, version 5. This document will be added to the case file but has not been assessed. The PUR process does not assess evidence.

3.4 Element 4: Business classification

Records are known and are identified within a structure, ideally founded on function. The Keeper expects an authority to have properly considered business classification mechanisms and its RMP should therefore reflect the functions of the authority by means of a business classification scheme, information asset register or similar.

RAG status rating: Green

3.4.1 Self-assessment Update

No change.

3.4.2 Progress Review Comments

No immediate action required. Update requested on any future change.

3.5 Element 5: Retention schedules

The Keeper expects an authority to have allocated retention periods to its public records and for those records to be retained and disposed of in accordance with a retention schedule.

RAG status rating: Green

3.5.1 Self-assessment Update

The Retention Schedule is reviewed regularly and updated as required to ensure it is up-to-date and in line with legislative and business requirements. The Retention Schedule was last updated in February 2025.

3.5.2 Progress Review Comments

Retention schedules are living documents liable to change to reflect business needs. It appears that the Valuation Joint Board understand this.

3.6 Element 6: Destruction arrangements

Records are destroyed in a timely and appropriate manner and records of their destruction are maintained. Section 1(2)(b)(iii) of PRSA specifically requires a RMP to include provision about the archiving and destruction, or other disposal, of an authority's public records.

RAG status rating: Green

3.6.1 Self-assessment Update

Transfer of all physical records for current and ex-employees is complete.

The Senior IT Manager has fully implemented electronic records destruction systems across the EDMS and keeps this under regular review. By way of explanation, all records within the EDMS are tagged with a review/expiry date when they are processed into the system. The date is in line with the Retention Schedule and is automatically applied when a mandatory document category is applied during the creation process. This is used to initiate a review of records to implement a decision to delete, or to retain. The review is undertaken by the Senior Officer. All unnecessary records on the EDMS have been deleted in line with the Retention Schedule.

A copy of the Records Management Policy is included in the PUR response for the Keeper to have sight of the Policy.

3.6.2 Progress Review Comments

Thank you for confirming that the arrangements expected by the Keeper around the destruction of public records, both digital and paper, are now fully operational.

The achievement of this objective marks a measurable improvement in the records management provision in the authority.

If this were a formal re-submission, and evidence of the systematic deletion of public records from the EDMS (a deletion report for example) could be provided, it is likely that this element of the Plan would turn from Amber to Green.

3.7 Element 7: Archiving and transfer arrangements

Records that have enduring value are permanently retained and made accessible in accordance with the Keeper's 'Supplementary Guidance on Proper Arrangements for Archiving Public Documents'. Section 1(2)(b)(iii) of PRSA specifically requires a RMP to make provision about the archiving and destruction, or other disposal, of an authority's public records.

RAG status rating: Green

3.7.1 Self-assessment Update

No change.

3.7.2 Progress Review Comments

No immediate action required. Update requested on any future change.

3.8 Element 8: Information security

Records are held in accordance with information security compliance requirements. An authority's RMP must make provision for the proper level of security for its public records. Section 1 (2)(b)(ii) states and authority's RMP must include provision about maintaining security of information contained in the authority's public records.

RAG status rating: Green

3.8.1 Self-assessment Update

The Information Security Policy has recently undergone a review and minor updates and was circulated to all staff (March 2026). The updates were essentially to make the Policy more user-friendly to ensure all staff could familiarise themselves and understand the Policy. The revised Policy was circulated to all staff with a reminder of the key principles.

The DPO continues to issue regular bulletins (at least monthly), bespoke training and maintain the Information Security Incident Log.

3.8.2 Progress Review Comments

As noted above, it is important that an authority keeps its policy and guidance documents under review and it is welcome that RVJB clearly does this.

This is particularly important around the area of information security. It is vital that an authority guarantees that it can react to changes in information security threat and that it has policies in place that ensure all the public records it manages are retained within appropriate security controls (for example by ensuring the policy and guidance documents are easily understood by staff). It is clear from this PUR that the Valuation Joint Board understand this.

Many of the recent information security breaches in the public sector stem from human error. It is therefore important that staff are trained on the authority's information security requirements and that this training is routinely repeated. Again, it seems clear that RVJB are actively pursuing this principle.

3.9 Element 9: Data Protection

Records involving personal data are managed in compliance with data protection law. The Keeper will expect an authority's RMP to indicate compliance with its data protection obligations.

RAG status rating: Green

3.9.1 Self-assessment Update

The Data Protection Policy was reviewed and revised in February 2025 (together with the Appropriate Policy Document for Special Category and Criminal Offence Data). The updates were minor to ensure it was as clear as possible for staff. The revised Policy was circulated to all staff with a reminder of key principles and responsibilities.

3.9.2 Progress Review Comments

Thank you for this update. The comments have been noted.

Furthermore the PRSA Implementation Team note that RVJB is registered with the Information Commissioner as a [data controller](#).

They publish a Privacy policy [online](#). This includes details of service user's rights as a data subject.

This element would likely retain its Green RAG status.

3.10 Element 10: Business continuity and vital records

An authority's business continuity arrangements should include the recovery of records made temporarily unavailable due to an unexpected event.

RAG status rating: Green

3.10.1 Self-assessment Update

In October 2024 RVJB migrated to a new DR system and vendor. The new service provides a broader scope of recovery options and protection. It also facilitates flexible testing options. Testing can now be fulfilled without invoking support from the provider. In response RVJB have agreed to test the recovery of IT and data systems more frequently (quarterly) and align recovery tests with identified disaster scenarios. The most recent test was on Wednesday the 4th Feb 2026. The scope was to recover and access Electoral systems in response to a power failure during a critical period on the day of an election. All major success criteria were met. Only minor procedural and configuration points were noted to have impacted the overall time to recover systems.

3.10.2 Progress Review Comments

Thank you for this update.

The increase to the recovery test cycle has been noted.

The recovery of records made temporarily unavailable by an unexpected event is an integral part of the authority's business continuity planning.

Staff training is fundamental to the smooth recovery in an emergency (including record recovery). It is expected that RVJB pursue this training regularly.

3.11 Element 11: Audit trail

The location of records is known and changes recorded.

RAG status rating: Green

3.11.1 Self-assessment Update

Paper records are minimal. Almost all records are managed electronically.

The EDMS system has versioning history to support audit of records. Each change to a record is recorded automatically by the system and the record keeps a track of version control.

Metadata is applied to files in the EDMS to support Records Management. For example, fields such as 'Date Received' and Category' are mandatory for all files. Supplementary metadata fields containing review dates, review decisions, and business functions enable granular classification and effective records management.

Automated workflows account for most files ingested into EDMS. They are designed to apply agreed naming conventions for files consistently.

The EDMS has a comprehensive search function that allows the user to track all records using a variety of criteria. To ensure the search functionality can be used effectively, there is an emphasis on the importance of using proper naming conventions. The DPO (in bulletins/ guidance and face-to-face training) emphasises the importance of consistent naming conventions. Checks are made regularly to ensure that appropriate naming conventions are being used.

The Information Asset Register also continues to be reviewed and used as a tool for audit trail.

3.11.2 Progress Review Comments

The EDMS will automatically impose version control on the Valuation Joint Board's public records and the powerful search tool should assist with locating records throughout, document libraries, emails, and teams channels (although consistent document naming is still recommended best practice).

As with element 4, the Keeper would probably be minded to retain the green, compliant grading against this element.

Clearly the implementation of the EDMS project has made a considerable difference (and almost certainly an improvement) in the record-tracking capabilities in RVJB.

3.12 Element 12: Records management training for staff

Staff creating, or otherwise processing records, are appropriately trained and supported.

RAG status rating: Green

3.12.1 Self-assessment Update

The DPO has made an in-house commitment to send bulletins specifically relating to Records Management matters at least quarterly. Bulletins include guidance specifically on the operation of the retention schedule and improving staff understanding of rules surrounding the principles of good records management. These are well received and staff demonstrate a good level of understanding and commitment to records management when face-to-face training sessions take place.

3.12.2 Progress Review Comments

The Keeper expects staff creating, or otherwise processing records, to be appropriately trained and supported.

There are repeated examples in this PUR that show this aspect of records management provision is properly considered by RVJB.

For example the Bulletins mentioned above and at element 08.

3.13 Element 13: Assessment and review

Records Management arrangements are regularly and systematically reviewed with actions taken when required. Section 5(1)(a) of PRSA says that an authority must keep its RMP under review.

RAG status rating: Green

3.13.1 Self-assessment Update

The Records Management Plan is a standing item on the Agenda at the monthly meeting of the Board's Governance Working Group. This ensures that the DPO and Senior Officer regularly review the Plan to ensure it is being properly implemented and have an opportunity monthly to raise any matters which require discussion.

3.13.2 Progress Review Comments

Section 5(1)(a) of the Act says that an authority must keep its RMP under review. The Keeper's Assessment Team acknowledge that this requirement is being appropriately pursued by Renfrewshire Valuation Joint Board.

They welcome the authority's continued engagement with the Keeper's Progress Update Review (PUR) process.

At the time of the original agreement (2016) The Keeper agreed that the Valuation Joint Board had made a firm commitment to review their *RMP* as required by the Act and have explained who will carry out this review and by what methodology.

3.14 Element 14: Shared information

Information sharing, both within the authority and with other bodies or individuals, is necessary, lawful, and controlled.

RAG status rating: Green

3.14.1 Self-assessment Update

No change.

3.14.2 Progress Review Comments

No immediate action required. Update requested on any future change.

3.15 Element 15: Public records created by third parties

Adequate arrangements must be in place for the management of public records created and held by third parties who carry out any functions of the authority, see section 3 of PRSA.

RAG status rating: N/A

3.15.1 Self-assessment Update

N/A

3.15.2 Progress Review Comments

As this Element was not assessed in 2016, no RMP baseline RAG-status exists. This Element will remain at 'N/A' until a formal resubmission takes place. However, the Keeper's PRSA Implementation Team can accept that Renfrewshire Valuation Joint Board are aware of their responsibilities under this element.

4. PRSA Implementation Team's Summary

The PRSA Implementation Team has reviewed Renfrewshire Valuation Joint Board's PUR submission and recognises this authority's efforts to manage their records.

The PUR RAG status for each element is indicative only of the situation as outlined by the authority in the PUR. The PUR RAG statuses to not change the RAG status of elements that have been formally agreed by the Keeper in an RMP assessment report.

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