

The Public Records (Scotland) Act 2011

Renfrewshire Valuation Joint Board

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

3rd September 2024

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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 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 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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6. Progress Update Review (PUR) Template: Renfrewshire Valuation Joint Board

Element	Status under agreed Plan 18JAN16	Progress review status 01AUG23	Progress review status 03SEP24	Keeper's Report Comments on Authority's Plan 18JAN16 Full Agreement Report at https://www.nrscotland.gov.uk/files/record-keeping/public-records-act/keepers-assessment-report-renfrewshire-valuation-joint-board.pdf	Self-assessment Update 15MAR23	Progress Review Comment 01AUG23	Self-assessment Update as submitted by the Authority since 01AUG23	Progress Review Comment 03SEP24
1. Senior Officer	G	G	G	Update required on any change.	No change.	Update required on any change.	No change	Update required on any future change.
2. Records Manager	G	G	G	Update required on any change.	No change.	Update required on any change.	No change	Update required on any future change.
3. Policy	G	G	G	Update required on any change.	The Records Management Policy was reviewed and revised by our Information Governance Solicitor/ DPO in January 2023. The Governance Working Group and Management Team reviewed the updates and approved in February 2023. The main updates are as follows: <ul style="list-style-type: none"> Addition of the principles of good records management as set out by the National Records of Scotland. The separation of 'Purpose' and 'Scope' in order to elaborate on both, particularly adding more detail on the responsibilities on all staff. Update on the cross-references to other Policies to ensure accuracy and up-to-date.	The Assessment Team thanks you for this update on recent Records Management Policy revision. It is apparent from this update that RVJB continues to keep their RM Policy up to date and therefore fit for purpose. Update required on any change.	No change. Reviews of this policy will take place at least every two years in order to take account of any new or changed legislation, regulations or business practices, or alongside reviews by National Records of Scotland in line with the Public Records (Scotland) Act 2011 if sooner than two years. A review is scheduled for the start of 2025.	Thank you for confirming that the Records Management Policy remains operational, and that it will be reviewed at least every two years.
4. Business Classification	G	G	G	Update required on any change.	A full review of the Business Classification Scheme was undertaken, incorporating into the Board's Retention Schedule to provide a consistent resource for staff in one place. It also contains an introduction and users' guide for staff. The integrated Business Classification Scheme and Records Retention Schedule is maintained by the Records Manager with support from the DPO. The Records Manager, DPO, Senior IT Manager and Service Co-Ordinator continue to hold monthly meetings to discuss, review and manage Electronic Records Management. There continues to be significant development to the migration of personnel, governance, and corporate electronic files over to the EDMS. The Records Manager and DPO continue to have regular meetings with an IT Manager and Senior Clerical Manager with responsibility for	Thank you for this very positive update on full review of the Business Classification Scheme, including the incorporation of the Board's Retention Schedule. This will help the organised migration of necessary content onto the EDMS. It is also very good to hear that DPO and the Records Manager continue to work collaboratively on RVJB's line-of-business system Elector8, and to engage colleagues in other relevant areas in conversations on records management.	No change.	Update required on any future change.

				the electronic system Elector8 to ensure it is being used to its full capacity for good electronic management of records. More recently, the Records Manager has encouraged the IT Manager and Senior Clerical Manager to be more proactive in discussing records management with their peer working group to gather different ideas and advice for this particular software.	Update required on any future change.			
5. Retention Schedule	G	G	G	Update required on any change. The Retention Schedule underwent a further review as part of the integration process with the Business Classification Scheme. During this process there was ongoing reassessment of the appropriate retention periods. The Records Manager and DPO worked closely with the Senior Clerical Manager and have completely reviewed and updated all retention periods for Electoral records.	The Retention Schedule review, alongside the BCS review, is a very positive step, especially taking the EDMS implementation into account. Thank you also for confirming that all Electoral Records retention periods have recently been reviewed. Update required on any future change.	The Retention Schedule has recently undergone a further review (January 2024). This was as part of a wider review / comparison of the retention schedule against retention periods built into the electronic filing system. This was an extensive exercise carried out by the Records Manager, DPO, Senior IT Manager and Service Co-Ordinator. During this process there was ongoing reassessment of the appropriate retention periods, particularly for governance arrangements. The main changes are as follows: <ul style="list-style-type: none"> • Addition of entries which existed in the electronic system, but which were not clearly indicated within the Retention Schedule. • Addition of new entries to align with new processes required under new legislation within Valuation function. • Updates to make it as user-friendly as possible, including creating new headings/ categories, consolidating categories, and removing unused/ unnecessary entries • Housekeeping updates, including updates to job titles, filing locations etc. 	The Assessment Team thanks you for this positive update on recent Retention Schedule review following a wider comparison with the automated retention rules within electronic records system. It is good to hear that this exercise has resulted in greater consistency and accuracy in the content and application of the Retention Schedule, and that this refresh has made the Schedule a better fit for purpose in terms of its precision and user-friendliness.	
6. Destruction Arrangements	A	A	A	The Board recognises the importance of the secure and irretrievable destruction of records and has supplied their <i>Protective Marking Handling Disposal Policy & 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	The Service Co-Ordinator has continued to work consistently on the migration of all our data stored on the management network shares to the EDMS and has made significant progress, with only minimal working documents remaining on network drives. This ensures that retention timescales are managed electronically by the system, as previously outlined.	This is a very helpful update, detailing ongoing work on records migration from network drives onto the EDMS, as detailed under Element 4 as well. This puts RVJB in a good position with regard to automated retention and destruction management.	Significant progress has been made by our Service Co-ordinator. All physical records for current employees have now been transferred to EDMS. Minimal physical records for ex-employees remain to be transferred, but work continues. Significant work has been done within the EDMS to ensure that all categories are streamlined and unnecessary records are	Thank you for providing this update regarding the transfer of information contained on physical (paper) records onto the EDMS. It is evident that work to embed

				<p>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 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>The Service Co-Ordinator also continues to prioritise destruction of physical records in line with the retention timescales. The Service Co-Ordinator recently was allocated a new assistant post who is ably assisting in managing destruction of physical and electronic records.</p>	<p>Thank you also for providing an update regarding physical (paper) records, as well as the additional resource provided for this area in the form of an Assistant post. This is very positive.</p> <p>It is clear that RVJB continues to invest in the improvement of its electronic records management operations (including both EDMS and a line-of-business system for valuation data), but that the full roll-out of these systems is still an ongoing endeavour.</p> <p>This element will remain at Amber until the electronic records destruction systems have been fully implemented and are operational.</p>	<p>deleted in line with the Retention Schedule or updated to reflect new working categories.</p>	<p>the new system continues.</p> <p>This element will remain at Amber until the electronic records destruction systems have been fully implemented and are operational. The Keeper would also appreciate the sight of the Electronic Records Management Policy.</p>
7. Archiving and Transfer	G	G	G	Update required on any change.	No update.	Update required on any change.	No change.	Update required on any future change.
8. Information Security	G	G	G	Update required on any change.	<p>No notifiable changes to arrangements, cyber security training/software still utilised, training sessions and bulletins continue to be regularly implemented as per previous submission.</p> <p>The Senior Officer, Records Manager, DPO and Senior IT Manager recently attended a Ransomware training course delivered by Cyber-Scotland which simulated a Phishing Attack scenario to work through with Ethical Hackers. The Senior IT Manager continues to implement technical and organisational measures to manage Information Security.</p> <p>It has not been previously noted that the DPO maintains an Information Security Log which records all Information Security incidents. This reinforces to staff the importance of reporting, even if the incident is a 'near-miss'. The reporting procedures work well. None have been identified as reportable to the Information Commissioners' Office but have been recorded for lessons learned and to identify any areas which may require further staff training.</p>	<p>Thank you very much for confirming that no major updates have been made to policies or practices under this element.</p> <p>It is good to hear of the recent ransomware training, attended by individuals in key records management roles.</p> <p>The described Information Security Log, maintained by the Data Protection Officer, is a helpful way to keep track of IS incidents and, as RVJB recognises, can result in better information security through near-miss reporting. It is clear from this update that Renfrewshire Valuation Joint Board continues to maintain robust information security arrangements.</p> <p>Update required on any future change.</p>	<p>The Information Security Policy has recently undergone a review and minor updates and was circulated to all staff (March 2024).</p> <p>The DPO continues to issue monthly bulletins to all staff which includes advice on information security matters as well as all other information governance matters including records management advice.</p> <p>Bespoke information security training is delivered annually by the DPO and this is programmed within RVJB's training plan.</p> <p>Cyber security training is also included within RVJB's training plan and will be undertaken biannually.</p>	<p>Thank you for confirming that the Information Security Policy has recently been updated and recirculated among all staff. It is also good to hear that the DPO remains active within the organisation in terms of sharing advice, information on best practice and providing training on a regular basis.</p> <p>It is also very positive to find that the recent IG audit found that Renfrewshire VJB 'Staff are regularly trained and made</p>

								<p><i>aware of their responsibilities for handling personal data</i>'.</p> <p>For comments on training, please see Element 12.</p>
9. Data Protection	G	G	G	<p>Update required on any change.</p>	<p>The Data Protection Policy was reviewed and revised by our Information Governance Solicitor/ DPO in January 2023. The Governance Working Group and Management Team reviewed the updates and approved in February 2023.</p> <p>The main revisals are as follows:</p> <ul style="list-style-type: none"> • Cross-reference to other related, key policies and procedures • Reference to the work of the Governance Working Group • Reference to Privacy Notices for staff and public 	<p>Thank you for updating us on RVJB's Data Protection Policy revision and update. It is especially good to hear that this has now been further linked to other key policies and procedures.</p> <p>Update required on any change.</p>	No change.	Update required on any future change.
10. Business Continuity and Vital Records	A	G	G	<p>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.</p> <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>Disaster Recovery Test was carried out in February 2023. The Senior IT Manager concluded it was a positive test. A member of staff was involved and during the test she was able to connect successfully and access a number of resources. During the test, there was successful connection to all file shares and mapped drives.</p> <p>Minor issues identified during the test are being resolved and will be retested.</p>	<p>The Assessment Team thanks you for this update. Periodical testing is a good way to measure aspects of an organisation's preparedness in the face of an unexpected events. It is positive to hear that this test had a positive outcome, and that minor issues identified are being resolved and retested.</p> <p>Update required on any future change.</p>	<p>The IT Team continue to prioritise Disaster Recovery Testing. The next Disaster Recovery Test is due to be carried out in May 2024.</p> <p>Additional Update 22 May 2024: <i>The Disaster Recovery Test was duly carried out in May and it was successful. No issues which require to be remedied were identified.</i></p>	<p>It is great to hear that regular Disaster Recovery Testing continues to take place. It is also positive that the most recent test did not result in any required remedial actions.</p>
11. Audit Trail	A	G	G	<p>The Board recognise that 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.</p>	No update.	Update required on any change.	No change.	Update required on any future change.

				<p>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>				
12. Competency Framework	G	G	G	<p>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.</p>	<p>No notifiable changes to arrangements, training sessions and bulletins continue to be regularly implemented as per previous submission.</p>	<p>Thank you for letting the Assessment Team know that Renfrewshire Valuation Joint Board continues to implement robust staff training and support. Update required on any future change.</p>	<p>No change.</p>	<p>The Assessment Team also notes the organisation-wide training and information bulletins provided by the DPO, as reported under Element 8, with many thanks.</p>
13. Assessment and Review	G	G	G	<p>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 and asks that he is kept informed of these self-assessments, particularly if they result in new policy documents or procedures being introduced.</p>	<p>Renfrewshire Council conducted an Internal Audit during 2021/2022. The findings were not complete at the date of the last PUR. The Internal Audit Report was concluded April 2022 and reported to Board on 10 June 2022, as follows.</p> <p>Audit Scope:</p> <ol style="list-style-type: none"> 1. Interviewed the relevant officers to ascertain the arrangements in place for records management and obtained a copy of the record management plan. 2. Prepared and undertook a series of tests to ascertain the progress in completing the actions contained within the record management plan. <p>Key Audit Assurance:</p> <ol style="list-style-type: none"> 1. There is adequate management/board oversight and progress against the records management plan is reviewed regularly. 2. Timeous progression of actions and developments is monitored through regular progress reviews which are adequately evidenced and reported on. 3. Although there have been no deviations from the plan to date, any variations could be easily identified through the progress reviews and confirmation was obtained that any 	<p>The Assessment Team is grateful to hear of the results of the Internal Audit 2021/2022. This is a great way to assess the practices and practical processes in place, and to ensure these match the policies and plans.</p> <p>The Team agrees that 'satisfactory arrangements are in place which ensure adequate progress of the Records Management Plan'.</p> <p>Update required on any future change.</p>	<p>Renfrewshire Council conducted an Internal Audit in 2023 of general information governance arrangements. The findings were not complete at the date of the last PUR. The Internal Audit Report was concluded in September 2023.</p> <p>The following is an excerpt from the Internal Audit Report:</p> <p>Key Audit Assurances</p> <ul style="list-style-type: none"> • <i>Personal information is kept secure through physical access controls and passwords; and is kept accurate and up to date through regular reviews.</i> • <i>Appropriate measures and records are in place to demonstrate compliance with key Data Protection Principles including application of the Data Protection and Information Handling policies.</i> • <i>Arrangements are in place to ensure that Data Privacy Impact Assessments are undertaken for new initiatives or change of business practices involving personal data.</i> 	<p>Thank you for sharing the final results of the recently-conducted internal IG audit by Renfrewshire Council, including the RVJB. It is excellent to hear of such positive findings.</p> <p>Renfrewshire VJB's participation in the PUR process is also a positive step, indicating continuous review and assessment of the authority's RM arrangements under the Records Management Plan.</p>

				<p>remedial action required would be agreed at an appropriate level in the organisation.</p> <p>There were no key risks identified during the audit.</p> <p>The audit identified that satisfactory arrangements are in place which ensure adequate progress of the Records Management Plan.</p>		<ul style="list-style-type: none"> • <i>Arrangements are in place to provide training on GDPR to relevant employees through annual refresher training, regular bulletins and awareness emails.</i> • <i>An Information Security Incident Log is in place but there have been no recorded data breaches.</i> <p>Key Risks <i>There were no key risks identified during the audit.</i></p> <p>Overall Audit Opinion <i>The audit identified that satisfactory arrangements in place for the handling of personal information within Renfrewshire Valuation Joint Board. The systems in place for the Electoral Register, Valuation Roll and Council Tax dwellings are well controlled and regularly reviewed. Staff are regularly trained and made aware of their responsibilities for handling personal data.</i></p> <p><i>As a result, there were no audit findings identified during this review and the auditor has made a provision of substantial assurance for the areas tested.</i></p>		
14. Shared Information	G	G	G	Update required on any change.	No update.	Update required on any change.	No change.	Update required on any future change.

7. The Public Records (Scotland) Act Assessment Team's Summary

Version

The progress update submission which has been assessed is the one received by the Assessment Team on 17th April 2024. The progress update was submitted by Heather Semple Information Governance Solicitor & Data Protection Officer.

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

PRSA Assessment Team's Summary

The Assessment Team has reviewed Renfrewshire Valuation Joint Board's 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 Valuation Joint Board continues to take its records management obligations seriously and is working to bring all elements into full compliance.

Section 5(2) of the Public Records (Scotland) Act 2011 provides the Keeper of the Records of Scotland (the Keeper) with authority to revisit an agreed plan only after five years has elapsed since the date of agreement. Section 5(6) allows authorities to revise their agreed plan at any time and resubmit this for the Keeper's agreement. The Act does not require authorities to provide regular updates against progress. The Keeper, however, encourages such updates.

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 resubmit its plan under section (5)(6) of the Act.

8. The Public Records (Scotland) Act Assessment Team's Evaluation

Based on the progress update assessment the Assessment Team considers that 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



Iida Saarinen
Public Records Officer