National Records of Scotland

Public Records (Scotland) Act 2011

Angus Council and Licensing Board Assessment Report

The Keeper of the Records of Scotland

24 March 2017

Contents

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 fully 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 record keeping 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. Executive Summary

This report sets out the findings of the Keeper's assessment of the RMP of Angus Council and Licensing Board by the Public Records (Scotland) Act 2011 Assessment Team following its submission to the Keeper on 4 October 2016**.**

The assessment considered whether the RMP of Angus Council and Licensing Board was developed with proper regard to the 14 elements of the Keeper's statutory Model Records Management Plan (the Model Plan) under section 8(3) of the Act, and whether in this respect it complies with it and the specific requirements of the Act.

The outcome of the assessment and the Keeper's decision on whether the RMP of Angus Council and Licensing Board complies with the Act can be found under section 7 of this report with relevant recommendations.

3. Authority Background

Angus Council is one of the 32 local government council areas of Scotland, a registration county and a lieutenancy area. The council area borders Aberdeenshire, Dundee City and Perth and Kinross. Main industries include agriculture and fishing. Angus was historically a county, known officially as Forfarshire from the 18th century until 1928. It remains a registration county and a lieutenancy area. In 1975 its administrative functions were transferred to the council district of the Tayside Region, and in 1995 further reform resulted in the establishment of the unitary Angus Council.

The Angus Licensing Board is responsible for regulating the sale of alcohol to the public, and certain gambling activities. It does this by issuing Alcohol licences and Betting and Gaming licences and permits.

4. Keeper's Assessment Process

The RMP was assessed by the Public Records (Scotland) Act Assessment Team on behalf of the Keeper. Assessors used the checklist elements listed in section 5, to establish whether Angus Council and Licensing Board's RMP was developed with proper regard to the elements of the Model Plan and is compliant with the Act. The assessment also considered whether there was sufficient supporting evidence of such compliance.

Key:

G	The Keeper agrees this element of an authority's plan.	A	The Keeper agrees this element of an authority's plan as an 'improvement model'. This means that he is convinced of the authority's commitment to closing a gap in provision. He will request that he is 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 Keeper may choose to return the RMP on this basis.

5. Model Plan Elements: Checklist

Element	Present	Evidence	Notes
1. Senior Officer *Compulsory element*	G	G	The Records Management Plan (RMP) of Angus Council and Licensing Board (hereafter referred to as 'the Council' for ease of reference) has identified Sheona Hunter, Head of Legal and Democratic Services and Clerk to the Angus Licensing Board, as the individual with strategic responsibility for records management. Ms Hunter is also referred to as the Chief Information Governance Officer. The appointment of Ms Hunter to these roles for both the Council and the Licensing Board is confirmed in a statement from the Chief Executive, Richard Stiff (evidence 01). It also outlines the Council's commitment to work towards best practice in information and records management.

			A statement from Ms Hunter accepting the responsibility for records management has also been submitted (evidence 02). The statement also describes Ms Hunter as being the senior accountable officer for complying with the Freedom of Information (Scotland) Act 2002 and the Data Protection Act 1998, as well as information security. Ms Hunter reports directly to Mr Stiff. The statement also offers support to the Project Lead (Information Governance) in her role as Records Manager (see Element 2). The RMP states that in December 2015 the Council set up a trust to carry out its functions in regard to sport, recreation, arts, heritage, archive and library service. This trust is called ANGUSalive. Submitted as evidence is a letter from the Chief Executive of ANGUSalive, Kirsty Hunter (evidence 03) endorsing the contents of the RMP and taking strategic responsibility for records management within the trust. The letter also appoints Carol Petrie, Principal Officer (Business Management and Development) as the individual with day-to-day responsibility for records management within the trust. The RMP describes the governance structure in place at the Council. The Records and Information Management Working Group, Data Protection and FoI Working Group, and Directorate Records Management Working Groups all meet on a regular basis and report to the Information Governance Steering Group, which is chaired by Ms Hunter. The Records and Information Management Working Group is chaired by Angela Dunlop (see Element 2). The Keeper agrees that an appropriate individual has been identified to take senior management responsibility for records management within both the Council and the Licensing Board as required by the Public Records (Scotland) Act 2011.
2. Records Manager	**G**	**G**	The Council has nominated Angela Dunlop, Project Lead (Information Governance) to take operational responsibility for records management. The statement from the

Compulsory element			Chief Executive (evidence 01) confirms Ms Dunlop in this role. In addition, the statement from Ms Hunter (see Element 1) also confirms Ms Dunlop's appointment in this role and her support for Ms Dunlop in carrying it out. The statement from Ms Hunter (evidence 02) states that she is operationally responsible for records management within the Licensing Board. Also submitted as evidence is Ms Dunlop's Job Description (evidence 04). This clearly shows that Ms Dunlop is responsible for the delivery of the information management and governance project. The RMP's document control page shows that Ms Dunlop is the author of the RMP. The Keeper agrees that appropriate individuals have been identified to take day-to-day responsibility for records management within the Council and the Licensing Board as required by the Public Records (Scotland) Act 2011.
3. Policy *Compulsory element*	**G**	**G**	The Council has produced a Records Management Policy, which is published on its website. This is version 1.2, approved in September 2015 by the Information Governance Steering Group. A link to the Policy has been provided. The Information Governance Improvement Plan 2016-2018 (evidence 06) contains an action (number 9) which states that all information governance and records management policies will be regularly reviewed. The Policy recognises that records and information are a valuable asset to the Council and outlines a commitment to develop a Business Classification Scheme, retention schedules, destruction and archiving arrangements, the introduction of an electronic records management system and a mandatory training programme for staff. The Policy also states that Senior Information Asset Owners from each Directorate

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sit on the Information Governance Steering Group. In addition, each service area will appoint a Records and Information Management Co-ordinator, who will be responsible for providing assistance and advice. The Keeper commends the creation of a network of staff who will assist in the dissemination of information governance policies across the Council and who can act as a point of contact for staff in local service areas.

The Policy is supported by a Records Management Guidance document (evidence 52). This provides further information and context about the implementation of the requirements set out in the Policy, including general records management principles and responsibilities.

A screenshot has been supplied as evidence (evidence 05) showing the location of the Policy and the Guidance document on the Council's intranet showing that staff have access to these important documents and are therefore aware of their responsibilities.

The 'Future Developments' section of the Element indicates that the Council are in the process of exploring options for purchasing an Electronic Document and Records Management System (EDRMS). It is currently carrying out an EDRMS review and scoping study. The Keeper requests that he is kept informed of the progress of these investigations as the decision to go ahead and implement an EDRMS will fundamentally alter the Council's recordkeeping systems.

The 'Future Developments' section of the Element also outlines the Council's commitment to developing an e-learning course for records management, similar to that which currently exist for Information Governance, Information Handling and Data Protection. These courses are currently mandatory for staff to complete every two years and are also included in the induction process for

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			new staff. The Keeper commends this commitment to training staff in information governance issues and requests that he is sent a sample of the records management training once it has been developed. The Keeper agrees that there is an operational records management policy outlining the Council's intention to achieve best practice records management and that staff are aware of their responsibilities.
4. Business Classification	**A**	**G**	**The RMP states that the Council is at the early stages of developing a Business Classification Scheme (BCS). It is intended that the Local Government Classification Scheme (LGCS) developed by the Information and Records Management Society will form the basis of the Council's BCS. The RMP states that service areas are responsible for creating their own file plans, which will then be collated to form the corporate BCS. Services are also developing Information Asset Registers (IARs) in order to identify business critical records. The Keeper commends the use of local business areas in the development of the BCS as this is likely to lead to a stronger business tool and encourages buy-in from across the organisation.** **The development of file plans and IARs forms part of the Information Governance Improvement Plan 2016-2018 (evidence 06, action 12). The estimated completion timescale of this project is November 2017. The Keeper requests that he is kept informed of the progress of the work and as evidence of the current work also requests a sample file plan or IAR.** A screenshot of the Covalent system (evidence 07) has been submitted showing that the development of IARs is part of the work to develop the BCS. An email from the Chief Information Governance Officer to senior managers alerting them to the need to develop file plans in their business areas has been provided (evidence 09). The Council has also submitted a screenshot from the Information Governance

			section of its intranet (evidence 05) showing that the Information Governance Improvement Plan 2016-2018 is available to staff. The screenshot also shows a link to a document entitled 'Angus Council Classification Scheme Guidelines'. The Council has submitted this document (evidence 53). It is the LGCS which will form the basis of the Council's BCS. Also provided as evidence are excerpts from the minutes of various meetings, including the Information Governance Steering Group, the Records and Information Management Group and local working groups (evidence 08). These show that the Council is working towards the development of its BCS and IARs at different levels. **The Keeper can agree this Element on an 'improvement model' basis. This means that the authority has identified a gap in provision (the lack of an organisation-wide BCS) and has identified how it intends to close this gap. As part of this agreement the Keeper requests that he is kept informed of the progress of the work.**
5. Retention schedule	**A**	**G**	The RMP states that the Council has adopted the Scottish Council on Archives Records Retention Schedule (SCARRS) for managing the retention and disposal of both paper and electronic records. More detailed retention schedules, based on SCARRS, have been created by some services within the Council. The retention schedule for Legal Services has been submitted (evidence 10). Retention schedules are applied to the Council's current EDRMS, IDOX, and retention rules can be applied to the records managed by this system. **The RMP goes on to say that although SCARRS has been adopted as a retention schedule by the Council, it is not uniformly applied to the paper records, electronic records and line of business systems used by the Council. The Council recognises that this is an area for development and states that a great deal of work has been undertaken to remedy this. The work to fully**

			implement the retention schedule is built into the Information Governance Improvement Plan 2016-2018 (evidence 06). The Keeper requests that he is kept informed as work in this area progresses. The Council is building an awareness of records management across the organisation by undertaking various events. A recent Ditch the Data Olympic Challenge (evidence 13), as part of the project to move to a clear desk way of working, was undertaken to encourage staff to dispose of records and documents that were no longer required and to transfer appropriate records to storage and the archive. This initiative tied in to the Agile Angus programme to allow staff to work in a more flexible manner. The initiative was supported by the Strategic Director of Communities and communications were sent to staff by email and on the Council's intranet. The Ditch the Data Challenge resulted in a substantial saving in both server storage and the destruction of a large quantity of paper records as per the retention schedule. The Keeper commends this as an excellent way of raising staff awareness of the importance of records management and the requirements of the retention schedule. **The Keeper can agree this Element on an 'improvement model' basis. This means that the authority has identified a gap in provision (the lack of a fully operational retention schedule) and has identified how it intends to close this gap. As part of this agreement, the Keeper requests that he is regularly informed of the progress of the work to close the gap.**
6. Destruction Arrangements *Compulsory element*	**A**	**G**	The RMP sets out the following arrangements for the destruction of its records: **Paper** – The RMP states that it employs a commercial paper shredding company (Shred-It) for the secure destruction of its paper confidential records. Secure lockable consoles are placed at various locations in staff offices. The contents of the consoles are emptied on a regular basis and are mostly destroyed on-site. Shred-It also disposes of microfiche, DVDs and other similar media. A sample destruction

certificate from Shred-It has been supplied showing that these procedures are operational (evidence 18).

Non-confidential paper waste is placed into recycling bins.

The RMP states that the Council does not use a commercial storage provider to store paper records off-site. The RMP also states that the Council is using its retention schedule to identify and dispose of legacy paper records. The Keeper recognises that this is a work in progress and commends the recognition of the need to securely dispose of legacy records.

Electronic – Retention schedules are applied to the Council's current EDRMS, IDOX, and retention rules can be applied to the records managed by this system. Otherwise, there is no systematic procedure in place for the destruction of electronic records when required by the retention schedule. The RMP states that the Records Manager (see Element 2) is currently using a system called Treesize to identify records and information held on shared drives which have exceeded their retention periods. A screenshot from the Treesize system has been supplied (evidence 20). This is then used to report to managers what is currently held on servers and by whom. The Treesize system (evidence 60) is used to manage network drive storage space by identifying historic, large or duplicate files which can then be deleted. The Project Lead (information Governance) (see Element 2) holds the Council's licence for the software and has access to most areas of the Council's servers. A recent exercise undertaken in July 2016 resulted in a saving of 787GB of server space.

The Information Governance Improvement Plan 2016-2018 (evidence 06) includes an action (13) to develop procedures for the permanent destruction of electronic records by August 2017. This is tied in to action 14 which will

			provide an audit trail of destroyed records. The Information Governance Improvement Plan also contains an action (15) to use 'Treesize to improve compliance with retention periods and disposal - associated with electronic documents'. **Hardware** – The RMP states that all obsolete hardware, including hard drives, is cleansed and disposed of by a commercial provider (Computer Recycling Services Ltd). The contractual details of this arrangement have been provided (evidence 19). **Back-ups** – The RMP states that the Council's data and systems are automatically and incrementally backed up nightly using the CommVault backup tool. Back-ups are retained for 35 days before being overwritten. The Council has produced a Records Retention and Disposal Guidance document (evidence 17) which provides staff with advice on how to practically destroy records at the end of their retention periods. Staff are required to complete an Authorisation for Records Destruction Form (evidence 15) prior to destroying records. A sample completed form from Legal Services has been provided (evidence 16) showing that a record is maintained of records which have been destroyed. This Guidance document and the retention schedules are available to staff on the Councils intranet (evidence 05). **The Keeper can agree this Element on an 'improvement model' basis. This means that the authority has identified a gap in provision (the destruction of electronic records held out-with the IDOX system) and has evidenced a commitment to close this gap. This agreement is conditional on the basis that the Keeper is kept regularly informed of the progress of work as it moves forward.**
7. Archiving and Transfer	**G**	**G**	The Council has its own in-house archive service based in the vicinity of Restenneth Priory. A link to the Archive Service's section of the ANGUSalive website has been

| Compulsory element | | | provided. The Keeper agrees that Angus Archives is an appropriate place for depositing Council records identified as having enduring value.

The RMP states that there are procedures in place to transfer appropriate records to the archive service. Council staff are required to fill out a Transfer to Archives Form (evidence 21) which accompanies records when they are transferred. The archive records receipt of the transfer in the day book and the records are then catalogued onto the CALM cataloguing system. Samples of the catalogue have been submitted showing that the records of the Council (evidence 22) and its predecessor body Angus District Council (evidence 23) have been catalogued and are available to potential researchers.

The RMP also states that the Senior Archivist is informed of occasions when storage areas and office space is cleared out in order to identify records of potential historical interest which can then be transferred to the archive service.

The Future Developments section of this Element indicates that Angus Archive's collections care and conservation plan is currently in draft. **The Keeper would be interested in seeing a copy of this document once it has been finalised.**

The Keeper agrees that the Council has identified an appropriate archive and has procedures in place to transfer records identified for permanent preservation to the archive. |
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| 8. Information Security *Compulsory element* | **G** | **G** | The Council has submitted its Information Security Policy (evidence 24). This outlines the Council's 10 principles of information security, such as protecting information to comply with legislation and Council policies, the allocation of responsibility for managing information assets to Information Asset Owners and the provision of training to staff. The Policy is available to staff on the Council's intranet (evidence 05) showing that staff have access to it and therefore are aware of their responsibilities. The Policy is supported by a number of other policies and |

procedures, such as an Email and Internet Policy, a Mobile Phone Policy and Guidance, an IT Security Policy and a Password Policy. These are available to staff on the Information Technology section of the Council's intranet and a screenshot has been supplied showing this (evidence 25).

The RMP states that paper records are stored in offices in filing cabinets, filing rooms, mobile racking and tambour cabinets. Some central file stores have a tracking system in place to evidence who has accessed paper files. A sample form tracking the movement of files from these stores has been provided (evidence 26).

The Council has also submitted its Physical Files Policy (evidence 54). This outlines the Council's approach to maintaining the security of paper records, both in and out of the office environment. The Policy states that directorates must operate a clear desk policy which ensures that paper files are locked away when not in use.

The Council has submitted its IT Security Policy (evidence 62) which details the procedures in place to protect the Council's information and systems. Section 25.4 of the Council's Financial regulations, which are available on their website, highlights the responsibilities for ensuring information security within the Council. Also provided as evidence is the Public Services Network (PSN) compliance certificate (evidence 58) which shows that the Council meets the security requirements for connection to the PSN. This requires encryption to be in place wherever personal information is stored and all mobile devices must also be encrypted.

New staff inducted into the Council are required to complete e-learning modules on Data Protection and Handling Information Correctly and on Information Governance. A screenshot has been supplied showing how these are made available to staff (evidence 28). Refresher courses in these topics are required to be carried out every two years.

			The Information Governance Steering Group is responsible for reviewing Information Security on an on-going basis, but internal auditors have also been involved in 2015-2016 in reviewing the Council's provisions. Audits of Information Governance Data Security in the Children and Learning Directorate and IT Security were carried out. The final reports of the internal auditors have been supplied (evidence 29 and 30) showing a number of recommendations to improve compliance in these areas. The Keeper commends the use of internal auditors for monitoring levels of provision and reporting recommendations through the appropriate governance structures. **The Future Developments section of this Element states that the Financial regulations are currently being reviewed. The Keeper requests that he is informed when this taken place and is provided with a revised version or a link to the appropriate area of the Council's website. It also states that the Information Security Policy and the IT Security Policy will be merged into a single Information Security Policy. Additionally, the RMP states that the Information Security Users Guidelines (evidence 63) will also be updated to reflect the changes to the password policy (evidence 61). The Keeper requests that he is sent the amended copies of these documents when they become operational.** The Keeper agrees that the Council has procedures in place to protect the information and records that it creates and manages.
9. Data Protection	**G**	**G**	The Council is registered as a Data Controller with the Information Commissioner's Office (registration number: Z4842744). This registration includes reference to Licensing and Regulatory Activities which covers records created and managed by the Licensing Board. The Council has a range of guidance and procedures in place to ensure compliance

			with the Data Protection Act 1998. These are available to staff on the Council's intranet and a screenshot of the Data Protection section of the intranet has been submitted (evidence 31). This includes a document providing staff with guidance on dealing with Subject Access Requests. The Council has also submitted a document entitled 'The Data Protection Act 1998: An Overview for Employees' (evidence 55). This provides staff with a general outlook on the Council's obligations under the Act. A more detailed leaflet for employees has also been submitted (evidence 56) The Council has published its procedures governing access to information on its website. The Keeper commends this outward-facing approach. New staff inducted into the Council are required to complete e-learning modules on Data Protection and Handling Information Correctly and on Information Governance. A screenshot has been supplied showing how these are made available to staff (evidence 28). Refresher courses in these topics need to be carried out every two years. The RMP commits the Council to reviewing the training needs of its staff to ensure that training remains fit for purpose. This will be monitored by the Data Protection and Freedom of Information Working Group, which is also responsible for ensuring relevant policies and the registration with the Information Commissioner's Office are kept up-to-date. The Keeper agrees that the Council is aware of its obligations under the Data Protection Act 1998 and that staff are provided with relevant training and guidance to be able to meet these obligations.
10. Business Continuity	**A**	**G**	The RMP states that there a number of Business Continuity Plans (BCPs) in place which are managed and maintained by business continuity co-ordinators in each

| and Vital Records | | | service and that these BCPs are regulated by an overarching Council-wide business continuity action plan, which is overseen by the Council's Resilience Manager. The Council have supplied a copy of the Corporate Business Continuity Action Plan (evidence 57). This details the business continuity work which is planned to take place in 2016/2017, and identifies those responsible for the actions and anticipated timescales.

The RMP goes on to state that BCPs are created using an agreed template to ensure consistency of approach and these are then tested against the requirements of ISO 22301. Once a BCP has been developed it is then tested and exercises are run to ensure staff are familiar with it. Further testing takes place over a three year cycle. Sample BCPs for Technical and Property Services and Schools have been provided (evidence 36 and 37) showing how these business areas respond to and recover from an incident which interrupts their normal business.

The RMP states that business continuity can form part of the Council's internal auditors' work programme. A report for the audit of business continuity planning which took place in the reporting year 2015-2016 has been supplied (evidence 35) showing that arrangements are regularly reviewed.

Submitted are the Council's BCP Risk Management Guidance, Risk Management Guidance and Risk Management Strategy (evidence 32-34). These are used by the Council to identify potential risks and identify methods to mitigate these and are linked to the business continuity planning process.

The work to identify business critical records is built in to the project to develop a corporate BCS and IARs (see Element 4). The Keeper requests that he is kept informed of the progress of the work to identify vital records and put in place measures to ensure these are available in the event of a disaster. |
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			The Keeper can agree this Element on an 'improvement model' basis. This means that the authority has identified a gap in provision (the identification and protection of vital records) and has outlined how it intends to close this gap. As part of this agreement the Keeper requests that he is kept informed of the progress of this work.
11. Audit trail	**A**	**G**	The RMP states that the Council uses a number of systems to manage its records, including the IDOX EDRMS, SharePoint and Civica. Screenshots of the audit trail capabilities of these systems have been provided (evidence 38, 39 and 59). **The 'Future Developments' section of this Element indicates that the Council recognises that its shared drives currently have no audit trail functionality. This will be remedied by the procurement of a corporate EDRMS. Action 14 of the Information Governance Improvement Plan (evidence 06) contains a commitment to ensure that audit trails will form part of the specification for new systems. The use of metadata and Document Naming Conventions will form part of the Records Management training which is currently being developed.** Also submitted in evidence is the Physical Files Policy (evidence 54). This outlines the Council's approach to maintaining the security of paper records, both in and out of the office environment. The Policy states that directorates must operate a clear desk policy which ensures that paper files are locked away when not in use. The RMP goes on to say that within its Legal Services business area there is a check out card which staff are required to fill out when they remove and return files (evidence 26). There are also procedures in place to ensure that access to and movement of Pupil Progress Reports is properly managed. The Pupil Transfer File Guidance document (evidence 40) provides guidance on controlling access to these records and the

	 	 	measures to be taken when transferring these records between schools or to the Council **The Keeper agrees this Element on an 'improvement model' basis. This means that the authority has identified a gap in provision (the availability of audit trail functionality for records created and managed in a shared drive environment) and has evidenced a commitment to closing this gap. As part of this agreement the Keeper requests that he is kept informed of the progress of work to close this gap.**
12. Competency Framework for records management staff	**G**	**G**	The RMP sets out the Council's approach to records management which recognises that it is distinct from general office based duties and the importance of following records management best practice principles. Submitted as evidence is the Records Manager's (see Element 2) Job Profile (evidence 04). This shows a responsibility for developing and implementing information governance and records management systems in the Council. A list of the records management training undertaken by the Records Manager has also been submitted (evidence 41). This includes a formal qualification in Information Management as well as attendance at a number of training events. The Keeper commends the Council for supporting the Continuing Professional Development of the Records Manager. New staff inducted into the Council are required to complete e-learning modules on Data Protection and Handling Information Correctly and on Information Governance. A screenshot has been supplied showing how these are made available to staff (evidence 28). Refresher courses in these topics need to be carried out every two years. The Council is also developing a specific e-learning module on records management and this forms part of the Information Governance Improvement Plan

			2016-2018 (evidence 06). **The Keeper commends this commitment to ensuring staff have the necessary skills to carry out their records management responsibilities and would be interested to see a sample of this training once it has been developed and implemented.** The Keeper agrees that the Council recognises the importance of records management and is committed to ensuring staff have relevant access to training opportunities.
13. Assessment and Review	**A**	**G**	The RMP states that the Information Governance Steering Group, chaired by the Chief Information Governance Officer (see Element 1), is responsible for annually reviewing the RMP and the Information Governance Improvement Plan 2016-2018. The Steering Group in turn reports to the Council Management Team. The Improvement Plan itself (evidence 06) also requires the Council to review information governance and records management policies on a regular basis (Action 9). **The RMP indicates that a compliance framework is being developed by the Records Manager and audit colleagues. Audits into Information Governance Data Security in the Children and Learning Directorate and IT Security have been carried out recently. The final reports of the internal auditors have been supplied (evidence 29 and 30) showing a number of recommendations to improve compliance in these areas. A link to the Council's Annual Internal Audit Plan for 2016-2017, which is available on its website, has also been provided showing that information management and governance appears on the work programme for the internal auditors. The Keeper commends the use of internal auditors for monitoring levels of provision and reporting recommendations through the appropriate governance structures and requests that he is kept informed as work to develop a compliance mechanism moves forward.**

			The RMP also states that the Council has access to the Archives and Records Management Services (ARMS) self-assessment tool produced by the Scottish Council on Archives. The Council has submitted details of its registration to use the ARMS toolkit (evidence 43). The Keeper has endorsed the use of the ARMS mechanism as an appropriate method of measuring compliance with its records management requirements. **The Keeper can agree this Element on an 'improvement model' basis. This means that the authority has identified a gap in provision (the lack of a Council-wide method for ensuring that the RMP is assessed and reviewed to ensure that it remains current) and has identified how it intends to close this gap. As part of his agreement, the Keeper requests that he is kept informed as this work progresses.**
14. Shared Information	**G**	**G**	As part of the Joint Future Initiative the Council has developed a two tiered approach to sharing information-an over-arching General Information Sharing Protocol which is supported by Individual Protocols. Parties to the General Protocol include the Council, Dundee City Council, Perth and Kinross Council and NHS Tayside. A sample Information Sharing Protocol (ISP) between the Council and Tayside Police (evidence 50) has been submitted as evidence as well as a form for requesting information from the Council (evidence 49). The Council is also developing an ISP to govern the sharing of information as a partner to Health and Social Care Integration in the Angus and Tayside area (evidence 44). Records management is clearly considered as part of the arrangements. The RMP outlines the Council's intention to develop a database which will act as a register of all ISPs into which the Council has entered. This is built in to the Information Governance Improvement Plan 2016-2018 (evidence 06). The Keeper commends this approach.

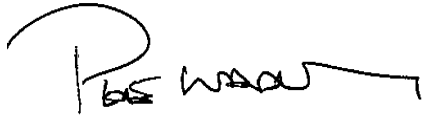|			Also submitted is a range of guidance governing the sharing of and access to records containing personal information. This includes Employee Request to view Personal Information (evidence 45), Councillors Request to Access Personal Files (evidence 46) and Social Work Access to Records (evidence 51).
			The Keeper agrees that the Council has procedures in place to share information internally and with other bodies securely and with regard to information governance.

6. Keeper's Summary

Elements 1-14 that the Keeper considers should be in a public authority records management plan have been properly considered by Angus Council and Licensing Board. Policies and governance structures are in place to implement the actions required by the plan.

7. Keeper's Determination

Based on the assessment process detailed above, the Keeper agrees the RMP of Angus Council and Licensing Board.

The Keeper recommends that Angus Council and Licensing Board should publish its agreed RMP as an example of good practice within the authority and the sector.

Assessment Report

This report follows the Keeper's assessment carried out by,

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Pete Wadley   **Robert Fotheringham**
Public Records Officer   Public Records Officer

8. Endorsement of Report by the Keeper of the Records of Scotland

The report has been examined and is endorsed under the signature of the Keeper of the Records of Scotland as proof of compliance under section 1 of the Public Records (Scotland) Act 2011, and confirms formal agreement by the Keeper of the RMP as submitted by Angus Council and Licensing Board. In agreeing this RMP, the Keeper expects Angus Council and Licensing Board to fully implement the agreed RMP and meet its obligations under the Act.

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Tim Ellis
Keeper of the Records of Scotland