

The Public Records (Scotland) Act 2011

Falkirk Council and Falkirk Licensing Board

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

27 November 2017

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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 **Falkirk Council and Falkirk Licensing Board**. The outcome of the assessment and relevant feedback can be found under sections 6 – 8.

4. Authority Background

Falkirk Council is a unitary authority which provides all local government services for the Falkirk Council area, which has a population of 151,570. The Council Headquarters are located in Falkirk, but there are many service points throughout the area. The Council has in the region of 7,000 employees making it one of the largest employers in the area and has a net council general fund expenditure of £344.8 million for 2012/2013. There are 32 councillors in 9 wards of 3 or 4 members each.

Licensing is the responsibility of Licensing Boards under powers contained in the Licensing (Scotland) Act 2005. Local Licensing Boards have wide discretion to determine appropriate licensing arrangements according to local needs and circumstances and their own legal advice. Each local government area must have a Licensing Board. Falkirk Licensing Board consists of 10 Board members.

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. Records Management Plan Elements: Checklist

Falkirk Council and Falkirk Licensing Board (Hereafter 'the Council')

Element	Status of elements under agreed Plan, August 2013	Status of evidence under agreed Plan, August 2013	Progress assessment status, 2017	Keeper's Report Comments on Authority's Plan, August 2013	Self-assessment Update as submitted by the Authority since August 2013	Progress Review Comment - 2017
1. Senior Officer	G	G	G	Update required on any change	There have been some changes in personnel since August 2013. These have been notified to the Keeper and the published version of the plan has been updated.	<p>The Keeper received a letter in November 2016 identifying Mary Pitcaithly, Chief Executive of Falkirk Council, as the individual with overall strategic responsibility for records management within the authority. This is confirmed by the latest version of the Plan available on the Council's website.</p> <p>The Keeper also received in April 2017 a letter from Colin Moodie, Clerk to Falkirk Council</p>

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						<p>Licensing Board, stating that he has overall strategic responsibility for records management within the Licensing Board and that he fully endorses the RMP. This is confirmed by the latest version of the Plan available on the Council's website.</p> <p>The Assessment Team thanks the Council for these updates and commends the updating of the published Plan to reflect the current situation within the authority.</p> <p>The Assessment Team recognises the on-going initiative being undertaken by the authority under this element.</p>
2. Records Manager	G	G	G	Update required on any change	<p>There have been some changes in personnel since August 2013. These have been notified to the Keeper and the published version of the plan has been updated.</p> <p>The Records Manager post has</p>	<p>Although the Records Manager post has been vacant since 2014 the Council and Licensing Board have identified Wendy Barber, Information Governance Manager, as the individual with operational responsibility for records management within</p>

					<p>been vacant since February 2014. The responsibilities of that post have been undertaken by the Information Governance Manager since the creation of that post in June 2016. It is recognised that a Records Manager is needed to focus on improvement areas. The job description (which is out-of-date) is currently being re-graded prior to recruitment to the post.</p>	<p>these authorities. This is confirmed by the letters received by the Keeper in November 2016 and April 2017. This arrangement is similarly reflected in the latest published version of the RMP.</p> <p>The Assessment Team recognise that a suitable individual, answerable to senior management, has been identified under this element.</p> <p>Whilst there is no expectation on an authority to employ a professional Records Manager, the Team welcome the efforts to update the job description and re-grade the position of Records Manager prior to recruitment to this post. Should a Records Manager be hired, the Assessment Team would welcome having sight of evidence outlining this new arrangement.</p> <p>The Assessment Team recognises the on-going</p>
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						initiative being undertaken by the authority under this element.
3. Policy	A	A	G	<p>A 2013 version of the authority's <i>Records Management and Preservation of Archival Records Policy</i> has been created, but is yet to be signed off at senior management level. The Keeper would ask that the revised policy is submitted once it has been implemented</p>	<p>A statement in support of the Policy was signed by the Chief Executive in November 2013. The Policy was approved by the Council's Executive Committee in January 2014 and subsequently published on the Council's website. The Policy has recently been updated by the Information Governance Manager to reflect some minor changes in terminology and to update references to relevant legislation. An updated statement in support of the amended Policy was re-signed by the Chief Executive in September 2017. A copy is attached.</p>	<p>The Council have submitted a copy of <i>Records Management and Preservation of Archival Records Policy</i> (Version 2, dated 2017) which clearly states why records management is important for operational efficiency and outlines how to ensure the effective management of records and information within the authority. This includes identifying staff responsibilities and the legal/regulatory framework in which the authority operates.</p> <p>Crucially this Policy is signed off and endorsed by the Chief Executive, Mary Pitcaithly, as of September 2017. As such the Assessment Team consider that the authority has brought itself into full compliance under this element.</p> <p>The Team also commend the authority's commitment to</p>

						<p>review this Plan to ensure it remains up-to-date. The Team would welcome updates in future PUR submissions should such reviews lead to significant changes to the Policy.</p> <p>The Assessment Team are pleased to see that this authority has made significant progress under this element.</p>
4. Business Classification	A	G	A	<p>The Business Classification Scheme (BCS) appears to cover all of the functions of the council, licensing board and joint board. The authority plans to add retention schedules and identify vital records in a revised BCS. The authority plans to use the BCS as a structure for managing their unstructured server-based electronic files until an EDRMS is put in place (investigations into this are currently on-going). This element of the RMP can be agreed as an improvement</p>	<p>The Council's Records Management Working Group has approved a Business Classification Scheme, which incorporates retention schedules and identifies vital records. This replaced the old Retention Schedule in January 2017. A copy of the BCS is attached.</p> <p>There are sections of the BCS which still require review by Services to ensure they reflect types of records actually held and that appropriate retention periods are in place.</p> <p>An EDRMS is not yet in place,</p>	<p>Falkirk Council have submitted their 'Business Classification and Retention Schedule' which was dated and signed off in February 2017. The Assessment Team thanks the authority for receipt of this revised BCS. This is a comprehensive document which identifies the functions and activities undertaken across the Council. Whilst this must be a business decision for an authority, the adoption of a functional approach to classification is considered best practice.</p>

				<p>plan. The Keeper would like to see the BCS with the incorporated retention information and vital records once this has been implemented.</p>	<p>and the BCS is not yet used as a structure for managing unstructured server-based electronic files.</p> <p>The Council is still at an early stage of investigating the use of SharePoint in the Council, in part as an EDRMS. A pilot SharePoint project is underway within the records management team.</p> <p>The Council is due to embark on an information asset audit, driven by preparations for the General Data Protection Regulation (GDPR) coming into effect in May 2018. This will map the information held by the Council and (amongst other things) its purpose, the retention period which applies and who has responsibility for that information. This will form an Information Asset Register.</p> <p>This also forms the first phase of a 5-year Council transformation project looking at how it deals</p>	<p>The BCS also encompasses retention schedules and decisions and identifies vital records. The Assessment Team therefore commend the creation of this document as an inclusive tool which will help staff to recognise record series and lead them to apply consistent decisions as to their management.</p> <p>The authority recognises that work is still required to review some sections of the BCS to ensure its accuracy and relevance. The Team would be pleased to receive updated versions of the BCS in future PUR submissions once these reviews have taken place.</p> <p>The Keeper's Model Plan expects the BCS to inform the structure of the record management system operated by an authority. Falkirk Council's BCS is not yet used for managing unstructured server-based electronic files, nor is an</p>
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					<p>with its information. This will be a major piece of work by the Council (with the Information Governance Manager as project manager), which will be overseen by a new Information Management Working Group, it is expected that this project will help to improve our BCS. It may be that the Information Asset Register and the BCS are combined into one document.</p>	<p>EDRMS operational within the authority. However there is a clear commitment in this submission from Falkirk Council to close these gaps in provision; a pilot SharePoint project is underway. The Assessment Team applaud this initiative and would welcome updates as work progresses on this project.</p> <p>The authority is also adopting a proactive approach to the General Data Protection Regulation (GDPR) coming into effect in May 2018 by embarking upon an information asset audit which will lead to the creation of an Information Asset Register (IAR). Although the creation of an IAR is not a requirement under this element, the Team commend this endeavour and consider it as a sign of the authority's commitment to enhance its record management provisions. The Team would like to receive updates on this development in future PUR submissions.</p>
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						<p>These developments are part of a wider 5-year project by Falkirk Council to transform how it handles its information and records. This project, and the institution of a new dedicated Information Management Group to oversee it, is applauded by the Assessment Team. They would be pleased to receive updates on this project, especially if it results in a new document combining the BCS and IAR.</p> <p>The Assessment Team considers that progress is being made and that this element should remain under improvement.</p>
5. Retention Schedule	G	G	G	The retention and disposal schedule appears to cover all the records created by the council, licensing board and joint board. As in element 4, once the BCS has been created with retention and disposal	See Element 4.	The comprehensive retention and disposal schedule provided for the Keeper's formal assessment has now been mapped to the 'Business Classification and Retention Schedule' provided in this PUR submission. This inclusive

				<p>information added, the Keeper would like to see this</p>		<p>document provides pre-determined dates for decisions to be made as to the destruction or archival transfer of records.</p> <p>The Assessment Team commends this approach as it will allow staff to easily identify the decisions required for all classes of records being created by the authority.</p> <p>The Assessment Team recognises the on-going initiative being undertaken by the authority under this element.</p>
<p>6. Destruction Arrangements</p>	<p>A</p>	<p>G</p>	<p>A</p>	<p>The council recognises the need to improve methods for destruction of electronic records – the rolling out of the BCS to manage files on servers and introduction of a new email system is evidence of planned improvements. The Keeper wishes to be kept informed of the implementation of these planned improvements</p>	<p>Deletion of electronic records (including emails forming part of those records) in line with retention periods is still an issue. Plans for an EDRMS will assist with this, as will the information asset audit.</p> <p>The Council is in the process of moving to a new version of its email system (Microsoft Exchange 2007 to Microsoft Exchange 2012) to ensure PSN</p>	<p>The submission demonstrates that Falkirk Council is committed to implementing policies and procedures to ensure the irreversible destruction of electronic records. This is evidenced by the plans for introducing an EDRMS and the shift to a new email system (Microsoft Exchange 2012) which will ensure Public Services Network compliance. The Assessment Team</p>

					<p>compliance. This will necessitate mailbox users clearing any backlog of archived emails. The new system will not have any archiving facility. It is intended that the Council's new Information Management Working Group will approve new guidelines on the handling of email.</p> <p>Destruction of social work records in line with retention periods has been halted due to the constraints of the Scottish Child Abuse Inquiry. However, given the publication of practice guidelines on records by the Inquiry on 24th August 2017, it will now be possible to make progress on destruction of social work records which fall outwith those of interest to the Inquiry.</p>	<p>commend these efforts and recognise that they may take some time to fully implement. As such the Team would be happy to receive updates as work in these areas continue.</p> <p>Similarly the Team would welcome sight of any new guidelines approved by the Information Management Working Group in future PUR submissions concerning email handling.</p> <p>The Team thank the authority for notification of a temporary halt to the destruction of social work records due to the requirements of the Scottish Child Abuse Inquiry. This is an issue that a number of public authorities are affected by and the Team recognise the necessity of delaying destruction of records beyond their usual destruction dates. However, it is heartening to hear that new practice guidelines issued by the Inquiry will now allow disposal to</p>
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						<p>continue for records falling outside their area of interest.</p> <p>The Assessment Team considers that progress is being made and that this element should remain under improvement.</p>
7. Archiving and Transfer	G	G	G	Update required on any change	<p>Falkirk Archives is still operated by Falkirk Community Trust on behalf of Falkirk Council.</p> <p>The Archives remain accessible to the public although staff reductions have meant that the research room is closed on Tuesdays (and at weekends, as before).</p>	<p>It is clear from the submission that the arrangements for transferring records produced by the authority to Falkirk Archives remain in place, although the Team note that public access has been slightly curtailed due to staff reductions. The Assessment Team thanks the authority for this update concerning archiving provisions.</p> <p>The Assessment Team recognises the on-going initiative being undertaken by the authority under this element.</p>
8. Information Security	G	G	G	Update required on any change	<p>The Information Security Policy is under review and will be updated before the General</p>	<p>This authority continues to demonstrate a high level of compliance under this element.</p>

					<p>Data Protection Regulation takes effect.</p> <p>Mandatory annual data protection training (which incorporates information security) is in place for all staff who handle personal data. The training is updated annually. Council training statistics are reported annually to senior management.</p> <p>Risks on cyber security and information asset are now included in the Council's corporate risk register, and reported on periodically.</p> <p>A data breach notification procedure is now in place and the Information Governance Manager maintains a data breach log which is reported periodically to senior management.</p>	<p>This is reflected in the proactive steps being taken to review the <i>Information Security Policy</i> prior to the introduction of the General Data Protection Regulation and in the development of the data breach notification procedure and use of a data breach log. Such endeavours will likely assist the authority in complying with the requirements of GDPR. These initiatives are commended by the Assessment Team, who would be pleased to be notified of the changes to the <i>Information Security Policy</i> in future PUR submissions.</p> <p>The Team likewise welcome the review and updating of the mandatory training for all staff who handle personal data. This ensures that training remains relevant and up-to-date.</p> <p>The inclusion of cyber security risks within the Council's corporate risk register is similarly applauded as an</p>
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						<p>example of good practice. Following the ransomware attacks earlier this year, it is advisable for authorities to update and monitor their digital information security arrangements.</p> <p>The measures in place to ensure that senior management remain aware of information security issues, whether through the reporting of training statistics or discussion of the data breach log, are commended by the Assessment Team. Such arrangements will guarantee the on-going prioritisation of information security at a senior level within the authority.</p> <p>The Assessment Team recognises the on-going initiative being undertaken by the authority under this element.</p>
9. Data Protection	G	G	G	Update required on any change	In June 2016, the Council appointed an Information Governance Manager to lead on this area.	The appointment of an Information Governance Manager in June 2016 reflects the authority's on-going

					<p>The Council has a Data Protection Policy in place, along with Data Protection and Confidentiality Guidelines. These are highlighted in the mandatory data protection training.</p> <p>See also element 8.</p>	<p>commitment to the requirements under this element.</p> <p>The Team commend the mandatory data protection training (see Element 8 above) and the highlighting within this programme of the Data Protection Policy and Confidentiality Guidelines. Ensuring staff are aware and have access to such policies is recommended in The Keeper's Model Plan.</p> <p>The Assessment Team recognises the on-going initiatives being undertaken by the authority under this element.</p>
10. Business Continuity and Vital Records	G	G	G	Update required on any change	No change	No immediate action required. Update required on any future change.
11. Audit Trail	A	G	A	The authority has stated that they currently do not have version control procedures in place but have committed	<ul style="list-style-type: none"> Electronic records – no progress. This will be progressed once an electronic records 	Audit trail capabilities are necessary to ensure that an authority can accurately track the location and editing of its

				<p>to investigate this once their electronic records solution is in place. This element of the RMP can be agreed as an improvement plan. The Keeper would recommend that any policy/procedure document is submitted to him once implemented</p>	<p>solution is in place.</p> <ul style="list-style-type: none"> • Paper records – no change • Version control – guidance is in place and a copy is attached. This is not yet routinely used across the Council. The introduction of an EDRMS will assist with version control. 	<p>records. Falkirk Council recognised in its original submission that this was an area that required further work, chiefly in respect to its electronic records.</p> <p>The authority has identified that the implementation of an EDRMS will greatly improve its audit trail functionality. Although the Keeper cannot recommend any specific solution, he acknowledges that EDRMS packages usually offer the required level of audit trail capabilities. The Assessment Team therefore commends the authority's continuing efforts to implement an organisation-wide EDRMS and believe this will help them comply with the requirements of this element. The Team would welcome updates in future PUR submissions on the state of progress towards achieving an electronic records solution through implementation of an EDRMS.</p>
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						<p>Until an EDRMS solution is rolled-out it is necessary to adhere to version controls and naming conventions to aid audit trail functionality. Falkirk Council recognise this and have submitted their <i>Guidance on Version Control</i> as evidence. This document outlines why version control is important and offers guidance on how staff should save documents to ensure that they can be identified and that changes can be tracked. The Assessment Team commend the introduction of this policy and would welcome updates on when it is fully operational across the Council.</p> <p>The Assessment Team considers that progress is being made and that this element should remain under improvement.</p>
12.	G	G	G	Update required on any change	No change	No immediate action required. Update required on any future

Competency Framework						change.
13. Assessment and Review	G	G	G	Update required on any change. The Keeper is interested to hear news of the Bi-Annual Reviews and how they have been undertaken	<p>The bi-annual reviews were last completed in May 2016. The last review was completed as a group exercise by the Records Management Working Group, with each Service representative estimating the level of its Service's compliance with each element, by way of a percentage.</p> <p>Whilst that this was a useful starting point, on reflection, it is not considered that this is a particularly helpful way to assess progress over a longer period of time, particularly when there were some improvement actions required corporately. In the past year, review has been focussed on 2 key areas – the BCS and electronic records, which were the areas where there was greatest risk and greatest potential for improvement.</p> <p>The BCS is now in place</p>	<p>The Keeper expects authorities to regularly review and assess the record management arrangements under their Plan to ensure these provisions remain relevant and fit for purpose.</p> <p>The Assessment Team therefore applaud Falkirk Council's commitment under this element to use, initially, bi-annual reviews and now the PUR process to identify areas where further work is required.</p> <p>The Team believe that using such reviews to recognise where resources are required (the BCS and electronic records in this case) will help authorities in bringing all fourteen elements into full compliance. This is evidenced by the fact that Falkirk Council have now developed a BCS and are working to introduce an EDRMS.</p>

					<p>(although not fully implemented) and management of electronic records is still a work in progress, which will be aided considerably by the introduction of an EDRMS.</p> <p>The Council welcomes the new Progress Update Review process as a more comprehensive means of assessment and review. The Council's submission has been reviewed by its Records Management Working Group and the Corporate Risk Management Group.</p>	<p>The Team also welcomes the involvement of dedicated bodies such as the Records Management Working Group in such internal reviews. This should ensure wider organisational engagement and senior management buy-in.</p> <p>The Assessment Team look forward to receiving updates following internal reviews in future PUR submissions, particularly if significant progress or changes have occurred.</p> <p>The Assessment Team recognises the on-going initiative being undertaken by the authority under this element.</p>
14. Shared Information	G	G	G	Update required on any change	There have been changes across the information-sharing landscape since submission of the RMP, which make it difficult to have local arrangements (such as the creation of national police and fire services). There	The submission demonstrates that Falkirk Council continue to demonstrate a high level of compliance under this element. The authority is aware of new initiatives such as the Information Sharing Toolkit and

					<p>have also been Scottish Government national initiatives such as the Information Sharing Toolkit.</p> <p>The Council continues to work closely with its main partner, NHS Forth Valley, to ensure that robust information sharing arrangements are in place. Health and social care integration has made this even more essential.</p> <p>Preparations for the General Data Protection Regulation in May 2018 will include the Council mapping the personal data it holds, how that is shared and how any use/sharing is communicated to data subjects.</p> <p>The Council maintains a master list of information sharing agreements to which it is party.</p>	<p>are taking steps to anticipate changes in the information-sharing landscape, be this the advent of integration joint boards or the introduction of GDPR. The continued close working with partners such as NHS Forth Valley, and the planned project to map personal data and how it is used/shared, reflects the authority's efforts to ensure their information sharing practices remain relevant and appropriate in this changing landscape. The Assessment Team would welcome updates in future PUR submissions on these on-going developments.</p> <p>The Team likewise commend the Council maintaining a master list of information sharing agreements as an example of good records management practice.</p> <p>The Assessment Team recognises the on-going initiative being undertaken by the authority under this element.</p>
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Version

The progress update submission which has been assessed is the one received by the Assessment Team on 28 September 2017. The author of the progress update submission is Wendy Barber, Information Governance Manager.

The progress update submission makes it clear that it is a submission for **Falkirk Council and Falkirk Licensing Board**.

7. PRSA Assessment Team's Summary

The Assessment Team has reviewed **Falkirk Council and Falkirk Licensing 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

Falkirk Council and Licensing Board continue to demonstrate a strong commitment to adhering to, and enhancing, their agreed records management arrangements. This is reflected in the development of a new Business Classification Scheme encompassing retention decisions and identifying vital records. There is also a strong awareness within the authority of changes taking place within the recordkeeping landscape, such as the advent of the General Data Protection Regulation (GDPR), and proactive initiatives are underway to help the Council be ready for these changes.

A number of elements, including Elements 4, 6, and 11, are reliant on the implementation of an EDRMS, potentially SharePoint, for the tracking and destruction of electronic records. Due to the importance of this project the Assessment Team would welcome updates in future PUR assessments as work in this area continues.

With the submission of a signed Records Management Policy there has been sufficient progress made under Element 3 for the Assessment Team to award a Green Rag status. Although this is an informal marking which does not alter the statutory marking awarded by the Keeper in August 2013, it provides an indication of the Team's opinion as to the current state of archival provision within the authority.

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 Falkirk Council and Falkirk Licensing 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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Neil Adams
Public Records Officer