

The Public Records (Scotland) Act 2011

North Ayrshire Council and Licensing Board

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

4th April 2023

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

4. Authority Background

North Ayrshire Council is one of 32 council areas in Scotland. It has a population of roughly 136,000 people. It is located in the southwest of Scotland, and borders the areas of Inverclyde to the North, Renfrewshire to the Northeast and East Ayrshire and South Ayrshire to the east and south respectively.

The area was created in 1996 as a successor to the district of Cunninghame. The council headquarters are located in Irvine, which is the largest town. The area also contains the towns of Ardrossan, Beith, Dalry, Kilbirnie, Kilwinning, Largs, Saltcoats, Skelmorlie, Stevenston, West Kilbride, as well as the Isle of Arran and the Cumbrae Isles.

North Ayrshire Licensing Board is the statutory licensing authority responsible for all Alcohol and Betting Licences in North Ayrshire. The Board is constituted under the Licensing (Scotland) Act 2005 and Gambling Act 2005.

<http://www.north-ayrshire.gov.uk/home.aspx>

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: North Ayrshire Council and Licensing Board

Element	Status of elements under agreed Plan 24JUL15	Progress review status 17OCT18	Progress review status 04APR23	Keeper's Report Comments on Authority's Plan 24JUL15	Self-assessment Update 22JUN18	Progress Review Comment 17OCT18	Self-assessment Update as submitted by the Authority 24OCT22	Progress Review Comment 04APR23
1. Senior Officer	G	G	G	Update required on any change.	From 1 October 2018 the Senior Officer is Craig Hatton, Chief Executive of North Ayrshire Council.	The Keeper thanks the authority for this update to Element 1 which is required under the Public Records (Scotland) Act, s1 (2) (a).	No update required to Chief Executive of North Ayrshire Council.	Thank you for letting the Assessment Team know that there have been no changes to this Element. Update required on any change.
2. Records Manager	G	G	G	Update required on any change.	From June 2018, the person with corporate responsibility for records management for North Ayrshire Council is: Lauren Lewis, Information Management Officer. Contact: North Ayrshire Council, Council Offices, Cunninghame House, Friarscroft, Irvine KA12 8EE	Element 2 is required under the Public Records (Scotland) Act, s1 (2) (a). The Model Plan states "It should be noted that staff changes will not invalidate any submitted plan provided that all records management responsibilities are transferred to the incoming post holder and relevant training is undertaken."	From June 2022, the person with corporate responsibility for records management at North Ayrshire Council is Kirsty Hamilton, Information Management Officer. Contact details: North Ayrshire Council, Cunninghame House, Friars Croft, Irvine, KA12 8EE Attached updated role profile which maintains	The Assessment Team thank you for this update which has been noted. Thank you also for supplying us with a copy of the updated role profile, this has been received. Update required on any change.

						<p>The authority has provided the job description of the new post along with a supporting statement from Elizabeth Quinn, Senior Manager (Data). The new post of Information Management Officer has operational responsibility for corporate records management and has been allocated all the records management responsibilities of the previous post of Information Governance Manager. The post reports directly to the Senior Manager (Data), thus retaining the same reporting structure as the previous post. The Senior Manager (Data) has a strengthened strategic responsibility.</p> <p>The authority has provided an on-going commitment to ensuring that the responsibilities for records management under the RMP are addressed in the appropriate manager. They have stated that "Creating</p>	<p>responsibility for records management as reflected in previous PUR update.</p> <p>The IMO post continues to directly report to the Information Governance Senior Manager; allowing for strategic oversight and escalation routes to the Executive Leadership Team.</p>	
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						<p>the new, separate role of Information Management Officer who has operational responsibility for corporate records management, strengthens our records management approach and commitment, where previously it was one element of a much wider role.”</p> <p>Ms Quinn has advised that a wider restructure is planned within the next 12 months. The outcome of this restructure should be advised to the Keeper if this results in any further change in the allocation of records management responsibilities.</p> <p>Ms Quinn has also explained that the Council fully supports appropriate training and development of the Information Governance Officer, Ms Lewis.</p> <p>The Keeper is content that this redistribution of responsibilities and allocation of the specific</p>		
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						records management responsibilities to the post of Information Governance Officer meets the standards identified in the Model Records Management Plan.		
3. Policy	G	G	G	The Council demonstrates a strong level of compliance under this element with the development of a comprehensive policy and a series of strategy documents outlining their longer-term approach to Information Management. Also submitted is the <i>Records Management Manual</i> , which supports the Policy, and which is currently under review. The Keeper requests that any revised version is forwarded in order that he may keep the Council's	North Ayrshire Council has revised various policy and guidance documents to reflect changes in legislation and Council initiatives in both data management and digital engagement. These include the Records Management Manual, the Information and Records Management Policy, and the Information Management Strategy. The Council has also developed a Digital Strategy to drive improved management and use of data in service delivery.	Copies of the Information and Records Management Policy (v5.0, Feb 2018), Records Management Manual (v3.0, June 2018), the Information Management Strategy (v2, Dec 2015) and Information Governance Procurement Framework (undated) have been provided. The Keeper thanks the Council for keeping its submission up to date.	No further updates have been made to policy since 2018. The Information Management Strategy is now under review and forms part of the Information Governance Operational Plan for 2022/23.	Thank you for this update. Element 3 of PRSA stipulates that the authority must have an appropriate policy statement on records management. Although no updates to this policy have been made since 2018, the Assessment Team understands the policy remains operational. The receipt of five pieces of evidence supporting this Element is acknowledged with thanks. Review of RMP and supporting documentation is

				submission up-to-date.	The Information Governance Procurement Framework has been restructured into a more user-friendly format to encourage greater compliance.			considered under Element 13 below. Thank you also for letting us know that the IM Strategy is under review. Update required on any change.
4. Business Classification	G	G	G	<p>North Ayrshire Council have a comprehensive and in-depth Information Asset Register (IAR) which is based on the Local Government Classification Scheme. The Keeper considers this a wholly appropriate guide on which to base the IAR.</p> <p>The Council intends to use this existing IAR to inform the file plan structure when the authority begins the implementation of an Electronic Document and Records</p>	<p>There is no change to the use of the Local Government Classification Scheme within the Information Asset Register (IAR). The project to implement an Electronic Document and Records Management System (EDRMS) has now been superseded by the introduction of the Office 365 and SharePoint project. This project will form part of the Council's plan for delivering the Digital Strategy. This will use business classifications to</p>	<p>This update is noted with thanks. The decision to use Office 365 and SharePoint instead of an EDRMS is a business matter for the Council. It is good to know that the LGCS continues in use as the Council's business classification scheme and will be operational within the new electronic records systems. The Assessment Team would welcome updates on this project in future PURs.</p>	<p>As noted in 2018 PUR, there is no change to the use of the Local Government Classification Scheme within the Information Asset Register (IAR).</p> <p>North Ayrshire Council continues to progress with the implementation of O365. A key element of this major project is the rollout of OneDrive and SharePoint for all Council staff to replace shared and personal drives. A dedicated Project Board comprising subject matter experts (including Information Governance) is in place to strategically guide the decisions made throughout the project lifecycle.</p>	<p>The Assessment Team thanks you for letting us know that there have been no major changes to this Element, and that the Local Government Classification Scheme within IAR remains in place.</p> <p>Thank you also for indicating that O365 and SharePoint implementation is ongoing, and the implications on business classification system and records retention are being taken into account. The revised completion date for</p>

				<p>Management System (EDRMS). The Keeper commends this project and would welcome updates as work in this area progresses.</p>	<p>support content and records management within the new suite of tools. A technical implementation partner was appointed in June 2018 and the project aims to deliver the new solution to all Council staff by end 2019.</p>		<p>Information classification, retention periods and introduction of the use of metadata have been implemented across SharePoint utilising both policy and labelling available in the application.</p> <p>Due to the scale of the project and resource required, the provisional timescales detailed in 2018 PUR have now been amended. Estimated completion for migration to SharePoint is now 2026. All project work is now delivered in house.</p>	<p>file migration has been noted with thanks.</p>
5. Retention Schedule	G	G	G	<p>The Council are committed to developing new retention schedules centred on each Service area. The creation of new schedules, which will be based on those produced by the Scottish Council on Archives, is recognised as a positive initiative</p>	<p>The Council continues to base its retention and disposal schedules on the model retention and disposal schedules produced by the Scottish Council on Archives. These will facilitate the cleansing and migration of electronic data on</p>	<p>This update is noted with thanks.</p>	<p>The Council continues to align to the Scottish Council on Archives Recommended Record Retention Schedules and liaises with Services on a case-by-case basis when undertaking data cleanses in preparation for SharePoint migrations to diverge from these retention periods.</p> <p>A master retention schedule is being</p>	<p>It is good to hear that the Council continues to align to the Scottish Council on Archives recommended Record Retention Schedules. It is also reassuring that the impact of the O365 /SharePoint migration project has been properly considered.</p>

				by the Keeper, especially as input from the local service areas will influence the nature of these new schedules. The Keeper would be pleased to receive updates as work on this project continues.	the Council's network shared drives to Office 365 and SharePoint.		prepared as part of the overall O365/SharePoint migration project. Links to the SCARRS schedules are available on the Council's staff intranet site and training provided at the mandatory information management course on how to interpret the schedules correctly.	The documents supplied as evidence are acknowledged with thanks. The Assessment Team look forward to progress updates in subsequent PURs.
6. Destruction Arrangements	G	G	G	Update required on any change.	No change other than the Information Classification Guidelines have been revised.	This update is noted with thanks.	North Ayrshire Council has a Confidential Waste Policy that establishes a compliant framework for Services purchasing shredders or procuring shredding services for destruction/confidential waste purposes. In total, 45 shredders were replaced/purchased as part of the original replacement exercise, ensuring that confidential information was being disposed of in a compliant manner by the organisation. With regards to the destruction of electronic	The Assessment Team is grateful for this update on Confidential Waste Disposal, including both paper and electronic records. The supporting documentation provided is also acknowledged with thanks. Update required on any future change.

							documents once migrated to SharePoint, through use of the labels, records are highlighted for review/delete according to retention and are then subject to disposition. A sign off process is in place for those records with a classification of Official-Protect and a retention of 6 years or more.	
7. Archiving and Transfer	G	G	G	The Plan states that the Council is developing a joint Archiving and Transfer Policy which will formalise the arrangements for transferring records selected for permanent preservation to an appropriate archive. The Keeper commends this endeavour and requests that he is provided with a copy of this document once it has been approved.	A working group has been established between the Data Service and representatives from the Economy & Communities Directorate which manages and operates the Heritage Centre. The objective of this group is to liaise with Ayrshire Archives to review the memorandum of understanding that currently exists, and where necessary, update this to reflect current business requirements for archives. The	The collaboration between the Council and its chosen archives facility is positive. The Assessment Team recommend that the working group should look closely at the Keeper's "Supplementary Guidance on Proper Arrangements for archiving public records" in developing the new Archiving & Transfer Policy. The Keeper will welcome sight of this in due course. https://www.nrscotland.gov.uk/files/record-keeping/public-records-act/supplementary-guidance-on-proper-	In addition to the update provided in 2018, North Ayrshire Council has created an Archive and Transfer Policy to reflect the arrangement in place with Ayrshire Archives for the safe transfer and archival of historic records.	The Assessment Team is pleased to hear that a formal Archive and Transfer Policy is now in place. A copy of this has been received with thanks. Update required on any future change.

					output of this piece of work will inform the new Archiving & Transfer Policy which will be created and signed off within the next 3-6 months.	arrangements-for-archiving-public-records.pdf		
8. Information Security	G	G	G	Update required on any change.	The Council has revised a number of information security policy and guideline documents to reflect changes to legislation and updated guidance from UK and Scottish governments on IT and Cyber Security. These include: Information Assurance Policy, IT and Cyber Security Policy, Third party access to Council resources guidelines, Guidelines for handling information and data, Guidelines for reporting IT and cyber security	Copies of the Information Assurance Policy (v1.0 May 2018); IT and Cyber Security Policy (v2 Nov 2017); Third party access to Council resources guidelines (v5.0 May 2016); Guidelines for handling information and data (v5.0 Nov 2017); Guidelines for reporting IT and cyber security incidents (v4.0 Nov 2017); and Loss of IT equipment guidelines (v4.0 Nov 2017) have been provided. The Keeper thanks the Council for keeping its submission up to date. Clearly there has been a thoughtful review of all policy in this area, partly prompted by legislative changes. The policy on Third Party access is usefully	North Ayrshire Council continues to review and update policies in Cyber and ICT according to legislative and business requirements. Since 2018, there has been the introduction of the Bring Your Own Device (BYOD) policy, which is attached to this update, alongside updated versions of the ICT Acceptable Use and 3 rd Party Acceptable Use policies.	Thank you for this update which has been noted alongside the evidence accompanying the submission. It is clear from this update that North Ayrshire Council and Licensing Board continue to take their information security requirements seriously. Update required on any future change.

					incidents, Loss of IT equipment guidelines.	comprehensive in its understanding of the range of third parties which may reasonably request access to the Council's information, ranging from contractors to students and volunteers. It is important that access to information by non-employees is appropriately controlled. The Council is to be commended for their work in this area.		
9. Data Protection	G	G	G	The Council demonstrates a high level of compliance under this element. However, as the Council's <i>Data Protection Policy</i> and <i>Subject Access Request Procedures</i> are currently under review, the Keeper requests that he is sent a copy of the revised documents once these are finalised and become operational.	The Council continues to employ a full time Data Protection Officer. This role meets the requirements of the General Data Protection Regulation (GDPR). All Data Protection policy and guideline documents have been revised to reflect the introduction of the GDPR and the Data Protection Act 2018. These include: Data Protection Policy, Privacy and fair	The Council has thoroughly reviewed its procedures and guidance in response to GDPR. Copies of <ul style="list-style-type: none"> • Data Protection Policy (v2.2 May 2018) • Privacy and fair processing of personal data (v1, Mar 2018) • Guidance on handling subject access requests, (v1.2 May 2018) • Data breach reporting and management procedures (v1 May 2018) • Data protection impact assessment information and 	In July 2021, the Council combined the Data Protection Officer role with that of Senior Manager (Information Governance). The role continues to meet the legislative requirements of the UK GDPR. This role directly reports to Executive Leadership and provides strategic guidance across the Council on data protection/governance issues. A copy of the role profile is attached to support this change. Data Protection Impact Assessment templates	The Assessment Team is grateful for this update on DPO role, now adopted by the IG Senior Manager. The role description provided has been received. The updates regarding DPIA templates are also noted with thanks. It is also positive to hear that personal data pertaining to children has received special attention.

					<p>processing of personal data, Guidance on handling subject access requests, Data breach reporting and management procedures, Data protection impact assessment information and guidance. The Council's Privacy Notice has also been updated.</p>	<p>guidance (v2 Apr 2018) A five-part privacy impact assessment questionnaire have been provided. The Keeper thanks the Council for keeping its submission up to date.</p> <p>The Guidance on subject access requests is a particularly helpful document in the light of recent GDPR changes. It uses clear language to assist staff in ensuring that they provide good customer service and comply with the law.</p>	<p>have been reviewed and are now combined into one document, allowing for a more user-friendly experience. Annual DPO/Service review and sign off has also been embedded into the process which further strengthens data protection and a privacy by design approach. Templates are split into the following themes allowing for specific questions to be asked regarding data processing:</p> <ul style="list-style-type: none"> - Project/new initiative - System/technical based - Children's data <p>To improve access to information for children and also to raise awareness of the privacy rights of the child (by virtue of the UN Convention on the Rights of the Child) NAC have created a Children's Privacy Notice and a DPIA template specific to the processing of children's</p>	<p>Thank you for indicating that the Council's Privacy Policy continues to be updated regularly.</p> <p>The new Corporate CCTV policy is also noted with thanks.</p> <p>This update, and the supporting documentation submitted, indicates that data protection remains a priority for North Ayrshire Council and Licensing Board. The Keeper thanks the Council for keeping its submission up to date.</p>
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							<p>data.</p> <p>The Council's Privacy Notice is updated regularly to reflect any changes to processing of individuals' personal data.</p> <p>The Council has recently introduced a Corporate CCTV policy which highlights the importance of compliance with the relevant information management legislation when handling CCTV images and footage. This includes the Data Protection Act 2018/UK GDPR and where applicable, Freedom of Information (Scotland) Act 2002.</p>	
10. Business Continuity and Vital Records	G	G	G	The Keeper agrees that the Council has an approved and operational business continuity plan and that the recovery plan encompasses vital records. However, as the submitted	Each Council service maintains a business continuity plan which includes arrangements for vital records and information assets. The Information Asset register also includes a field in each entry where	The Business Continuity Strategy (Oct 2015) has been provided and this sets out the framework in place for managing risk including risks affecting records and information. Additionally the authority has provided the Business Continuity Plan template (v0.1), the	<p>A new Risk and Business Continuity Management Strategy is in development. It is anticipated this will be approved in the financial year 2022/23. There have been operational delays due to the COVID-19 pandemic.</p> <p>A Business Continuity</p>	It is good to hear that North Ayrshire council and Licensing Board are developing a new Risk and Business Continuity Management Strategy, and that there is a centralised document site

				<p>Business Continuity Plan for the Chief Executive's Service is in a 'draft' state, the Keeper is not able to consider it. He will need to receive an authorised version to agree the evidence part of this element.</p> <p>The Keeper makes this agreement on the understanding that once the evidential sample has been fully signed-off the Council will submit it to him.</p>	<p>business continuity details are recorded for that information asset. The Council's corporate Records Management Unit (RMU) relocated in 2016 and a disaster recovery plan has been developed for the new location.</p>	<p>Vital Records Guidelines (v2.0 May 2018) and the Records Management Unit Disaster Recovery Plan (v1.0 June 2018).</p> <p>Provision for Vital Records is in the Business Continuity Plan template. The Council may also find it helpful to mention recovery of vital records in the responsibilities of the Recovery Manager so that they are considered within 72 hours. Getting specialist help within 72 hours of an incident involving water damage to paper records (for example a fire extinguished by water) will minimise recovery costs.</p> <p>A redacted copy of the disaster recovery plan has been provided. This covers initial actions and relies on specialist support from an appropriate specialist document recovery company. The Council may wish to consider building on this by establishing regular table-top exercises and</p>	<p>SharePoint Site has been created to:</p> <ul style="list-style-type: none"> - Store Business Impact Assessments providing live view of prioritised activities - Provide an online document site which provides a central store for all plans (locked down with appropriate permissions). - Services are required to keep a local copy of plans. A template business continuity plan is attached. - There is an online advice and guidance section providing information on a number of relevant issues. <p>The BCP refers to access to data required, which would include physical records. This can also be listed in the 'resource required for recovery' section.</p> <p>In addition to records management disaster</p>	<p>where all Business Continuity Plans pertaining to different business areas are collated alongside Business Impact Assessments (in addition of a local copy). The Team also note that the Council employs specialists in both Records Management Disaster, and Loss Mitigation.</p> <p>The tabletop exercises can be very helpful in testing existing arrangements for business continuity, and the undertaking of these should be commended.</p> <p>The Assessment Team thanks you for providing copies of the Harwell Certificate, RM Disaster Recovery Plan v3.0, and</p>
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						<p>training of records staff in conjunction with Heritage & Archives staff.</p> <p>A sample Business Continuity Plan for Customer Services (version 1.1, updated in May 2018) has been submitted. Section 4.4 considers the recovery of vital records. If this were a statutory assessment it is likely that this would move the RAG status from Amber to Green in the Evidence column.</p>	<p>specialists, the Council engages with loss mitigation specialists.</p> <p>The council has since conducted tabletop exercises on varying impacting scenarios as instructed by Risk and Business Continuity Service who proactively promote in service exercises to further embed BCM culture.</p>	<p>Business Continuity Plan template (June 2021). These have been received with thanks. It is evident from this update that efforts are being made to embed business continuity management culture into the authority's operations.</p> <p>Update required on any future change.</p>
11. Audit Trail	G	G	G	<p>The Council has procedures in place to ensure that the correct version of a record can be located and tracked. However, as the adoption of an EDRM system will likely lead to significant changes in audit trail functionality, the Keeper requests that he is informed if and when the EDRM becomes</p>	<p>Both the Document Control Guidelines and the File Naming Convention Guidelines have been revised. Along with other information and records management policy and guidance documents these will support the development of Office 365 and SharePoint. A new RecMan database is being developed</p>	<p>Copies of the Document Control Guidelines (v2.0 May 2018) and the File Naming Convention Guidelines (v10 May 2018) have been provided. The Keeper thanks the Council for keeping its submission up to date.</p> <p>As the Office 365 and SharePoint project progresses along with the new RecMan database, the Assessment Team would be interested in seeing updates in future</p>	<p>No further updates to the Document Control Guidelines and File Naming Convention Guidelines have been made since 2018 submission.</p> <p>Records Management now forms part of the mandatory face to face (currently Microsoft Teams delivered) induction Information Management training course for Council employees. This includes a brief overview of best practice for naming</p>	<p>The Assessment Team thanks you for this thorough update on audit trail arrangements.</p> <p>It is reassuring that in-person training takes place with regard to naming conventions and file structures, as staff competency has an impact on this Element. There are further comments on records management</p>

				operational.	to replace the existing database and improve the tracking of paper records. The new database is currently in the user testing phase and it is expected to be available to records management staff by end Sept 2018.	PURs.	conventions and file structures. See attached for PowerPoint for course content. A decision was made to cease development of the RecMan database due to technical and resource implications. The records management database has now been converted to Excel and is functioning well. The record retrieval process remains unchanged with records requiring to be signed out by authorised personnel only from the corporate Records Management Unit. The migration to SharePoint/O365 provides wider possibilities with regard to version control and access permission to documents. Communications on these topics have been sent to all staff to raise awareness of best practice. See attached for evidence.	training under Element 12. Thank you for letting us know that the RecMan database is no longer being developed, and MS Excel is being successfully used instead, and that there have been no changes to the record retention process. NAC is also right to consider the impact of SharePoint/O365 implementation which will result in greater version control and access tracking. The receipt of documents provided in evidence of this Element have been noted with thanks.
12.	G	G	G	There is a strong commitment	As part of the GDPR Project, a	It is positive to see that the Information	Training continues to be a mandatory element of	It is clear from this update that staff

<p>Competency Framework</p>				<p>under this element to provide training to staff in information management. Also staff are required to complete mandatory training in Information Security and Data Protection before being allowed to access Council systems. The Keeper commends these initiatives and requests that he has sight of documentation relating to such training once available.</p>	<p>comprehensive training programme was rolled out across all staff and Elected Members in the Council. The Information Governance Manager post is currently vacant and the scope of the role under review. From June 2018 the Information Management Officer (IMO) has corporate responsibility for records management and is a current and active member of the Information and Records Management Society (IRMS). She will be undertaking relevant training courses and qualifications to further develop her knowledge and experience. Following the relocation of the RMU the staffing level has reverted</p>	<p>Management Officer is being supported to maintain and develop her professional knowledge and qualifications.</p> <p>Operational management of the RMU appears to continue to be appropriately supported.</p>	<p>induction for all NAC staff.</p> <p>Since 2018, courses in IT and Cyber have been split out from Information Governance to allow for a more focused delivery of training on both topics.</p> <p>Briefings are delivered for newly elected members to raise awareness of Information Governance and Cyber Security. Attached copy of briefing session slides.</p> <p>Information Management team members continue to have access to IRMS materials through the Council's corporate membership, supporting continuous development in this area.</p>	<p>training on records management remains in focus, and that the Council understands the importance of staff records management competency on good information governance across all business areas.</p> <p>The evidence provided in support of this Element is noted with thanks, as are the positive updates provided under Elements 11 and 13. Based on this update, the Assessment Team remains confident in NAC's arrangements with regard to staff records management competencies.</p> <p>Update required on any future change.</p>
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					to two full time employees (the third role was temporary to support the move).			
13. Assessment and Review	G	G	G	The Council have opted to undertake a number of review procedures, including an annual assessment of compliance with the Plan by the Information Governance Manager, and the creation of an <i>Information Management Self-Assessment Workbook</i> to help services undertake self-assessment and gauge their levels of compliance with Council policies and practices. The Plan also commits the authority to include assessment of records management provision within	Following the introduction of the Progress Update Report (PUR) process by the National Records of Scotland, the Council intends to use this process to review progress on an annual basis. The Corporate Management Team was renamed the Executive Leadership Team (ELT) in 2016. As part of the GDPR Project, monthly reporting on information governance and data protection was provided to the ELT, and will change to quarterly reports from Q2 2018-19. The structure and remit of the Information Management	The internal review arrangements described here along with the commitment to use the PUR process is very positive and the Council is to be commended for this pro-active approach to assessment and review of its Records Management Plan. The review of the Information Governance Group and Data Protection Advisory Groups is sensible in the light of the new Data Protection Act 2018. As with Element 12, the Council should ensure that it continues to have professional advice on proper arrangements for its records at an appropriate level and has mechanisms for ensuring that all staff comply with its Records Management Plan.	The Council continues to use the PUR process as a mechanism for maintaining and reviewing compliance with its Records Management Plan. Information Governance updates are reported quarterly to the Executive Leadership Team (ELT) by the Senior Manager for Information Governance. This allows for a direct escalation route to Senior Leadership on any compliance concerns/corporate decisions required with regards to Records Management. The Information Management course has a dedicated course code which is recorded on the corporate HR system. Reports can be provided to ensure that training	Thank you for this update. NAC is commended for its continuing participation in the PUR process. It is also evident from this update that Information Governance continues to maintain a high profile in the organisation. For comments on training, see Element 12.

				<p>the internal audit programme.</p> <p>The Keeper applauds these planned endeavours as evidence of the Council's commitment under this element. As such the Keeper would welcome updates concerning these reviews and their results, particularly if they lead to significant changes in provision.</p>	<p>Governance Group (IMGG) and the Data Protection Advisory Group (DPAG) are currently under review and will be updated to reflect new legislation and align with Council strategies.</p>		<p>records are kept up to date and maintained appropriately.</p>	
14. Shared Information	G	G	G	<p>Update required on any change.</p>	<p>The strategic partnership working agreements are still in place. As part of the GDPR Project and the revision of the Information Governance Procurement Framework, the guidance on third party data sharing arrangements was updated and templates created to support both</p>	<p>Templates for Data Controller to Data Controller and Data Controller to Data Processor have been provided. The Keeper thanks the Council for keeping its submission up to date.</p>	<p>There has been no change to Element 14 since last update.</p> <p>North Ayrshire Council continues to implement an Information Governance Procurement Framework, ensuring that adequate information sharing procedures are in place when sharing data with third party providers.</p>	<p>Thank you for letting the Assessment Team know that there have been no major changes to this Element. It is reassuring to hear that an IGPF continues to be implemented with third-party providers.</p>

					data controller to processor and data controller to controller relationships. Completed data sharing agreements are held within the Information Asset Register and it is the responsibility of the relevant Service to ensure these are completed and maintained.			
15. Public Records Created or Held by Third Parties	N/A	N/A	N/A	[Not assessed]	N/A	N/A	<p>The Information Governance Procurement Framework (IGPF) ensures that appropriate clauses are embedded into contracts when the Council engages with third parties to process/maintain public records on behalf of the local authority.</p> <p>Records Management and Data Protection clauses are incorporated into the Council's Standard Terms and Conditions and are supplemented by the Data Sharing Agreements detailed at Element 14.</p>	<p>The Assessment Team thanks North Ayrshire Council and Licensing Board for providing this voluntary update on the new Element 15 which was not part of the Keeper's Assessment in 2015 when the RMP was agreed. It is particularly reassuring to hear that the Council recognises the need for specific contractual clauses in its agreements</p>

							<p>Arrangements for the transfer and return or secure destruction at the termination of contract are also included within the Standard Terms (available on the Council's website Procurement Conditions of Contract (north-ayrshire.gov.uk)).</p> <p>A Data Protection Schedule is included as part of the Contract where personal data is being processed as part of the Services being procured. (See Schedule 1 of Conditions of Contract).</p>	<p>with third parties in order to maintain its responsibilities for the public records created or held by these parties. The evidence provided is acknowledged with thanks.</p> <p>The status of this Element will remain 'N/A' as no baseline RAG-status is in place. The update given on this Element is commendable, however, and bodes well for the eventual RMP resubmission in due course.</p>
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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 31st October 2022. The progress update was submitted by Kirsty Hamilton, Information Management Officer & Records Manager.

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

The Assessment Team has reviewed North Ayrshire Council and Licensing Board's Progress Update submission and agrees that the proper record management arrangements outlined by the various 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

North Ayrshire Council and Licensing Board continues to take its records management obligations seriously and is working to maintain all elements in 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 North Ayrshire Council and Licensing Board continue to take their statutory obligations seriously and are working hard to maintain all the elements of their records management arrangements in 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

A handwritten signature in blue ink that reads "Iida Saarinen". The signature is written in a cursive style and is positioned above the printed name and title.

Iida Saarinen
Public Records Officer