

## **Public Records (Scotland) Act 2011**

### **Ayrshire Valuation Joint Board Assessment Report**

**The Keeper of the Records of Scotland**

**19 May 2016**

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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 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 Ayrshire Valuation Joint Board by the Public Records (Scotland) Act 2011 Assessment Team following its submission to the Keeper on 29 October 2015.

The assessment considered whether the RMP of Ayrshire Valuation Joint 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 Ayrshire Valuation Joint Board complies with the Act can be found under section 7 of this report with relevant recommendations.

### **3. Authority Background**

Ayrshire Valuation Joint Board was established by the Valuation Joint Boards (Scotland) Order 1995 to carry out the valuation functions of East Ayrshire, North Ayrshire and South Ayrshire Councils. It came into existence on 1st April, 1996 and was also given the responsibility of carrying out Electoral Registration on behalf of the three constituent authorities.

The composition of the membership of the Board is determined by the above Order and consists of 5 Councillors representing East Ayrshire Council, 6 Councillors representing North Ayrshire Council and 5 Councillors representing South Ayrshire Council. In order to carry out the valuation and registration functions, the Joint Board is required by law to appoint an Assessor who is an independent statutory official and who will also be a Chartered Surveyor. The Assessor has also been appointed by the three constituent councils as Electoral Registration Officer. In pursuit of these duties the Assessor and Electoral Registration Officer is answerable to the Courts in terms of valuation or registration decisions.

The Joint Board, through the office of the Assessor and Electoral Registration Officer and her staff, carry out three main functions:

1. To produce and maintain the Valuation Roll which sets out the rateable values of all "*lands and heritages*" (except where excluded by statute) for rating purposes.
2. To prepare and maintain the Register of Electors.
3. To produce and maintain the Valuation List which sets out the banding of all dwellings for Council Tax.

## 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 Ayrshire Valuation Joint 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:

<b>G</b>	The Keeper agrees this element of an authority's plan.		<b>A</b>	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.		<b>R</b>	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.
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## 5. Model Plan Elements: Checklist

Element	Present	Evidence	Notes
1. Senior Officer <i>Compulsory element</i>	<b>G</b>	<b>G</b>	<p>The Records Management Plan (RMP) identifies Helen D. M. McPhee, Assessor and Electoral Registration Officer as the individual who has senior responsibility for records management within the Board.</p> <p>This appointment is confirmed in a Statement of Responsibility from the Assessor and Electoral Registration Officer (evidence 001). This statement also highlights the Board's commitment to undertaking best practice records management.</p> <p>The Records Management Policy (evidence 002) mentions that the Board's Records Manager (see Element 2) reports to Ms McPhee. The Procedure for Dealing with Records Management (evidence 003) also describes the reporting structure.</p> <p>The Keeper agrees that an appropriate individual has been identified to take senior management responsibility as required by the Public Records (Scotland) Act 2011.</p>
2. Records Manager <i>Compulsory element</i>	<b>G</b>	<b>G</b>	<p>The individual identified as having operational responsibility for records management under this Element is John McConville, Head of Valuation Services and Assistant Electoral Registration Officer.</p> <p>The appointment of Mr McConville as records manager is confirmed in a Statement of Responsibility for Records Management (evidence 004). This statement is signed by both Mr McConville and Ms McPhee and also confirms that Mr McConville is responsible for Freedom of Information and Data Protection.</p>

			<p>Section 9 of the Records Management Policy (evidence 002) identifies the Head of Valuation Services and Assistant Electoral Registration Officer as the Board’s records manager, who will report to the Assessor and Electoral Registration Officer.</p> <p>The Procedure for Dealing with Records Management (evidence 003) also describes the reporting structure.</p> <p>The Job Description of the Head of Valuation Services and Assistant Electoral Registration Officer (evidence 005) has also been submitted which shows that records management is one of Mr McConville’s main duties.</p> <p>The Keeper agrees that the Board has identified an appropriate individual to take operational responsibility for records management.</p>
<p>3. Policy <i>Compulsory element</i></p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>The RMP states that the Board manages its records across a variety of systems: paper filing systems; specific IT applications used to carry out the Board’s main functions of Electoral Registration, Valuation for Non-Domestic Rating and Council Tax; and a mixture of shared/personal drives and SharePoint/Intranet site. The Records Management Policy and associated procedures apply to all these systems.</p> <p>The Board has submitted its Records Management Policy (evidence 002) which was approved by the Management Team in October 2015. The RMP states that the Policy is available to staff on the Board’s Intranet/SharePoint site and a screenshot showing where the Policy sits on the SharePoint site has been provided (evidence 002a). The Policy is also available on the Board’s website and a screenshot of its location on the website has been submitted (evidence 002b). The Keeper commends the publication of the Policy which allows stakeholders to see the Board’s approach to records management.</p> <p>The Policy is supported by a number of procedural documents:</p>

			<p>The Procedure for Dealing With Records Management (evidence 003) provides practical guidance for staff on creating, managing and disposing of records appropriately;</p> <p>The Procedure for Dealing With Vital Records (evidence 007) gives staff practical advice for identifying and protecting records, in different formats, which are vital for the continuation of the Board's activities in the event of a disaster;</p> <p>The Procedure for Transferring Records (evidence 008) outlines the principles for ensuring the safe and secure transfer of records to an archive.</p> <p>The Procedure for the Disposal of Records (evidence 009) sets out the requirements for securely destroying records. It highlights the need to maintain a log of the destruction records and also mentions the metadata related to the records to be destroyed. Also submitted as evidence is the Board's Retention and Disposal Schedule (evidence 010) which details the retention and disposal actions to be applied to categories of records.</p> <p>The Procedure for Clearing out Non-Domestic Files (evidence 011) describes the procedures for 'weeding' out documents which are no longer required for business purposes from within files. The Keeper commends this proactive approach to managing file sizes and disposing of documents within files.</p> <p>Also submitted as evidence is South Ayrshire Council's (which provides the Board with IT support) Security Information and Acceptable Use of ICT Facilities Policy (evidence 012) which the Board has adopted. Section 15 in the Rules for Use of Email states that email is not a records management system and that records or information received by email should be stored in the appropriate location so that it can be used by other staff.</p>
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			<p>The meeting of the Corporate Governance Forum on 1 September 2015 (evidence 013) noted that the retention schedule is a key part of the Board's RMP.</p> <p>The records manager (see Element 2) is currently developing a training programme for staff which is due to be rolled out in the Summer of 2016. The PowerPoint slides of the training have been supplied as evidence 050. The Keeper commends the Board's commitment to raising awareness of staff's responsibilities with regards to records management.</p> <p>Also submitted as evidence is a newly introduced Records Management Information Sheet (evidence 052) which will be included in the induction packs of new staff. It is also available to all staff on the Board's intranet and a screenshot has been provided showing its location on SharePoint (evidence 053). The Keeper commends this approach to raising the profile of records management.</p> <p>The Keeper agrees that the Board has a Records Management Policy that reflects its commitment to ensuring best practice records management and is available to all staff. The Board has also evidenced a strong commitment to providing staff with relevant training and raising the profile of records management within the organisation.</p>
4. Business Classification	<b>A</b>	<b>G</b>	<p>The Board has submitted its Business Classification Scheme (BCS) (evidence 014). It has been based on the Local Government Classification Scheme (LGCS), created by the Information and Records Management Society. The Keeper considers this an entirely appropriate tool for developing a BCS. The BCS utilises the first 3 levels outlined in the LGCS but has also added levels 4-6 which directly relate to the functions and activities of the Board.</p> <p><b>The 'Future Developments' section of the RMP states that the Board is considering the use of an Electronic Document Management System (EDMS). The Board has stated however that due to funding constraints the</b></p>

			<p>introduction of the EDMS will be postponed. The Board has also outlined how it intends to develop and implement the BCS. This project will consist of two phases. Phase 1 will ensure that all records will accord with levels 4-6 of the current BCS and it is anticipated that this work will take 18 months. Phase 2 will then incorporate records into levels 1-3 of the BCS and this element of work is anticipated to take 6 months, meaning that the BCS will take a total of two years to complete. The Board has also developed document naming conventions and version control guidance for staff (evidence 026a) when adding records to the SharePoint system. The Board has committed to keeping the Keeper informed of progress of this project.</p> <p>Also submitted as evidence is the Board's Retention and Disposal Schedule (evidence 010) which has been amended to closer reflect the activities laid out in the BCS.</p> <p>The minutes of the Corporate Governance Forum meeting held on 1 September 2015 (evidence 013) show that the Forum consider records management issues such as the retention schedule.</p> <p>The Board has confirmed that none of its functions are carried out by a third party.</p> <p><b>The Keeper can agree this Element on an 'improvement model' basis. This means that the authority has identified a gap in provision (the roll-out of the BCS) and has evidenced a commitment to closing this gap. Agreement of this Element is dependent upon the Keeper being kept informed of the progress of this project.</b></p>
5. Retention schedule	<b>G</b>	<b>G</b>	<p>The Board's Retention and Disposal Schedule (evidence 010) has been submitted and this details the retention and disposal actions to be applied to the types of records created in the course of carrying out its functions. The RMP states that the schedule covers all records in all formats. The Schedule also identifies the format of</p>

			<p>records, where they are stored, records which are confidential and also vital records. The Keeper commends the identification of vital records and their inclusion in the Schedule.</p> <p>The minutes of the Corporate Governance Forum meeting held on 1 September 2015 (evidence 013) show that the Forum consider the retention schedule to be an important part of their records management provisions.</p> <p>The Records Management Policy (evidence 002) also highlights the importance of the Schedule for managing the Board’s records.</p> <p>The Procedure for Dealing with Records Management (evidence 003) also contains (section 9) guidance for the disposal of records and also highlights the importance of disposing of records as per the schedule.</p> <p>The ‘Future Developments’ section of the Element states that the schedule is currently operational and that the movement of records to the Board’s intranet/SharePoint site affords an opportunity for the Schedule to be applied more rigorously.</p> <p>The Keeper agrees that the Board has a retention schedule which details the disposal actions to be taken against the categories of records it creates and manages.</p>
<p>6. Destruction Arrangements <i>Compulsory element</i></p>	<p><b>A</b></p>	<p><b>A</b></p>	<p>The Board has outlined its destruction arrangements as follows:</p> <p><b>Paper</b> – The Board has a contract with a commercial destruction supplier (Shred-It Ltd). Secure consoles are positioned throughout the Board’s premises for the disposal of confidential paper. Any large quantities of confidential paper waste are placed in a secure area until they can be shredded on-site. Guidance for the disposal of paper records is provided in the Procedures for Dealing with Records</p>

			<p>Management and the Disposal of Records (evidence 003 and 009). The Procedure for Disposal of Records also considers the issue of metadata (section 7).</p> <p>A sample destruction certificate has also been supplied to show that the procedures are operational (evidence 018). A Disposal Register (evidence 015) is maintained of all records that have been destroyed. The Keeper commends this approach.</p> <p><b><u>Electronic</u></b> – The Board is currently in the process of migrating electronic records from shared and personal drives to its SharePoint site. Part of this project is to identify and destroy obsolete records. The Records Manager, along with the Principal Administration Officer, ICT Development Officer and ICT Support and Development Officer are co-ordinating the migration to SharePoint and revised user guidance has been developed to allow more consistent naming and saving of documents. The move to SharePoint will also allow a more consistent approach to applying the retention schedule to records managed this way. Records that remain on the shared/personal drives will be managed as per the Board’s BCS and will also be subject to the Board’s naming conventions and retention requirements. The Keeper can accept that measures are in place to improve the level of provision in regard to the consistent, systematic destruction of electronic records.</p> <p><b><u>Hardware</u></b> – The Procedure for Disposal of Records (evidence 009) also details the arrangements that are in place for destroying obsolete hardware. An external contractor (CCL North Ltd) provides a secure destruction service and a sample destruction certificate (evidence 017) has been supplied as evidence that these arrangements are operational. The Board also require assurance from the contractor that the methods of transportation from Board premises to the place of destruction are appropriately secure.</p> <p><b><u>Back-ups</u></b> –The Board has indicated that it uses several methods to back up its</p>
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			<p>records and systems and has described the back-up timescales. This is confirmed in an email from the Board’s Business Support and Development Officer (evidence 049).</p> <p><b>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 systematic method for the destruction of electronic records) and has provided evidence that it is working towards closing this gap. As part of the agreement of this Element, the Keeper requests that he is kept informed of progress of work in closing the gap.</b></p>
<p>7. Archiving and Transfer <i>Compulsory element</i></p>	<p><b>A</b></p>	<p><b>A</b></p>	<p>The Board has developed a Procedure for Transferring records (evidence 009). This contains guidance about transferring records securely between the Board and other organisations, including Ayrshire Archives. This procedure sits alongside the Records Management Policy (evidence 002) and the Procedure for Dealing with Records Management (003).</p> <p><b>The Board has stated that discussions are currently underway with South Ayrshire Council and Ayrshire Archives to develop a Memorandum of Understanding (MoU) to govern the transfer of records selected for permanent preservation to Ayrshire Archives. A draft MoU has been submitted (evidence 009a) along with email correspondence between the Records Manager (see Element 2) and Ayrshire Archives showing that both parties are actively pursuing a formal agreement. The revised RMP states that this agreement will be approved and signed by October 2016.</b></p> <p><b>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 formal agreement between the Board and Ayrshire Archives) and has provided evidence that it is working towards closing this gap. As part of this agreement the Keeper expects to be sent a copy of the signed MoU prior to October 2016.</b></p>

			<p><b>Once he receives this the Keeper should then be able to ‘fully’ agree the Element. Should he fail to receive the finalised MoU the Keeper may choose to review his decision to agree this Element and, as this is a ‘compulsory’ Element under the Public Records (Scotland) Act 2011, this may impact his agreement of the Board’s RMP.</b></p>
<p>8. Information Security <i>Compulsory element</i></p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>The Board’s ICT services are provided by South Ayrshire Council and they are therefore required to follow their policies and procedures for the protection of their ICT systems. When Board staff log-in to their computers they are required to read, understand and accept the Board’s ICT Acceptable Use and other related policies. The statement that appears at log-in has been submitted as evidence 031. The Keeper commends the use of this approach to ensure that staff understand their responsibilities.</p> <p>The Board’s Information Security and Acceptable Use Policy (evidence 012) describes the measures in place to govern the secure use of computer systems, email and the internet. It covers areas such as the physical security of mobile devices, the secure use and storage of information, storing information sent by email in an appropriate location and general guidance on the use of the internet.</p> <p>The Board has submitted its Data Protection Policy (evidence 019) which states its commitment to ensuring the security of the personal information it collects and processes. The Policy lists the 8 data protection principles and the rights of data subjects. The Policy is supported by a Data Protection Staff Info Sheet (evidence 020) which provides information about the Act and outlines staff responsibilities.</p> <p>The RMP states that staff have access to these documents. The Board has submitted a screenshot showing the presence of the Information Security and Acceptable Use Policy and the Data Protection Policy on the SharePoint intranet site (evidence 044a). All staff also have access to South Ayrshire Council’s Online Training module on Information Security and a screenshot of this training has been</p>

			<p>supplied (evidence 054).</p> <p>The Board also maintains a Risk Register (evidence 022) which highlights increased quantities of Freedom of Information requests and creation of the RMP as potential information risks.</p> <p>The Board has also submitted a suite of documents which have been created by South Ayrshire Council but are also equally applicable to the Board. This suite includes:</p> <p>Guidelines for managing usernames and passwords (evidence 032);          Information Security Policy (evidence 034);          Standard for Controlling the use of Removable Media within South Ayrshire Council (evidence 035);          Procedures for Sharing Personal Data (evidence 042);          Guidelines for Sharing Personal Data (evidence 043);          Protecting Exchanges of Electronic Information (evidence 044)</p> <p>The RMP also indicates that the Board has a Clear Desk Policy.</p> <p>The Keeper agrees that there are robust procedures in place to ensure the protection of the records and information created and managed by the Board.</p>
9. Data Protection	<b>G</b>	<b>G</b>	<p>The Board has submitted its Data Protection Policy (evidence 019) which states its commitment to ensuring the security of the personal information it collects and processes. The Policy lists the 8 data protection principles and the rights of data subjects. The Policy is supported by a Data Protection Staff Info Sheet (evidence 020) which provides information about the Act and outlines staff responsibilities. These documents are published on the Board's website. The Keeper commends this outward-facing approach.</p>

			<p>The RMP states that staff have access to these documents. The Board has submitted screenshots showing the presence of the Data Protection Policy, the Data Protection Staff Info. Sheet and also the Procedure for the Effective Management of Personnel Records (evidence 044a). The Board has also provided a screenshot of where the Policy sits on their website (evidence 044c). All South Ayrshire Council staff have been made aware that they must complete compulsory online Data Protection training before the end of July 2016. This is evidenced by an email sent by the Council to the records manager which was then subsequently forwarded to Board staff (evidence 044b). Training on records management will be provided by the records manager and a sample of this draft programme has been submitted as evidence 050. This has yet to be rolled out to staff.</p> <p>The Board, under the umbrella of the Assessor and Electoral Registration Officer, is also registered as a Data Controller by the Information Commissioner’s Office (ref: Z6982129).</p> <p>The Keeper agrees that there are robust procedures in place to ensure the protection of the records and information created and held by the Board.</p>
<p>10. Business Continuity and Vital Records</p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>The Board has submitted its Business Continuity Plan (BCP) (evidence 023) which outlines the measures to be taken in the event of an interruption to normal service. This is reviewed every 6 months under the requirements of South Ayrshire Council and is also regularly reviewed at Corporate Governance Forum and Management Team meetings. The Board’s Risk Registers (evidence 022) are also reviewed regularly.</p> <p>The BCP is supported by the Procedure for dealing with Vital Records (evidence 007) which details the Board’s procedures for identifying and protecting vital records. Vital records are identified in the Retention and Disposal Schedule (evidence 010) but the Board is also working towards creating a separate Vital Records schedule which will identify vital records, detail where they are located and</p>



			<p>how they are protected. The Board has submitted a template of how this schedule will look (evidence 024). The Keeper commends the creation of the vital records schedule as an excellent central point of reference for staff.</p> <p>The Keeper agrees that the Board has a Business Continuity Plan in place and has procedures in place to identify and protect its vital records.</p>
11. Audit trail	<b>A</b>	<b>G</b>	<p><b>The RMP states that electronic systems are able to provide audit trail information. The Board has submitted a series of screenshots showing the audit trail functionality in place for the Electoral Management System (evidence 048).</b></p> <p><b>The Board is currently in the process of migrating all, or the vast majority, of its records held on shared drives to an Intranet/SharePoint system. The BCS will be used, along with document naming conventions and version control, to impose a structure on the records held on SharePoint, and this will improve the audit trail provision for electronic records. The Board has also developed document naming conventions and version control guidance for staff (evidence 026a) when adding records to the SharePoint system.</b></p> <p>A screenshot has been provided (evidence 025) showing how the SharePoint site is structured. Guidance has also been produced to allow staff to add records and documents to the SharePoint system (evidence 026). A SharePoint Working Group has also been established to review the development and use of SharePoint. The remit of the Group is set out in evidence 027. The Records Manger (see Element 2) sits on this Group and will be able to contribute to the Group from a records management perspective.</p> <p><b>The RMP states that the Board currently has about 200,000 paper files which require to be accessed on a regular basis. The Board is moving towards a way of working that is predominantly electronic, but until that happens it still has a</b></p>

			<p>considerable amount of paper records which it needs to use. The Board has developed a File Removal Card (evidence 047) for use when paper files are removed from filing cabinets. This is to be trialled for 6 months from October 2016. The upcoming Revaluation in 2017 will rely on a considerable amount of access to the paper files which should subside in October 2016 and this has been identified as a more feasible and realistic starting point for the trial. The results of the trial will be reported to the Management Team. The Keeper looks forward to finding out the results of this trial.</p> <p>The Keeper can agree this Element on an ‘improvement model’ basis. This means that the authority has identified a gap in its records management provision (the tracking of paper records and electronic records being migrated to SharePoint) and has identified solutions which would allow it to close that gap. As part of this agreement the Keeper will need to be kept informed of the progress of this work.</p>
<p>12. Competency Framework for records management staff</p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>The Job Description of the Head of Valuation Services and Assistant Electoral Registration Officer (evidence 005) has been submitted as evidence of compliance with Element 2 and shows that records management is one of the records manager’s main duties. The records manager has attended various events run by the National Records of Scotland to raise awareness of requirements under the Public Records (Scotland) Act 2011 (PRSA).</p> <p>The RMP states that all staff have access to online training packages provided by South Ayrshire Council, including one course on Information Security. A screenshot of the training portal has been supplied as evidence 029. The ‘Future Developments’ section of this Element states that the Board will consider making this training mandatory for staff. The Keeper commends the commitment to ensuring that staff are provided with appropriate training.</p> <p>The RMP also commits the Board to providing its staff with training on the</p>

			<p>requirements of PRSA. The 'Future Developments' section of this Element states that this will be developed and rolled-out by the records manager within the next 12 months. The Keeper would be interested to see a sample of this training once it has been produced.</p> <p>The 'Future Developments' section of this Element also states that the Board will produce a PRSA staff Information Sheet which will be included in staff induction packs. The Keeper commends this proactive approach to ensuring that staff are aware of their records management responsibilities under the Act and he would be interested to see a copy of the sheet once it has been developed.</p> <p>The Keeper agrees that the Board recognises the importance of records management as a distinct part of staff responsibilities and is committed to ensuring that staff have appropriate training.</p>
<p>13. Assessment and Review</p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>The RMP describes the way in which the RMP and associated policies and procedures are assessed and reviewed.</p> <p>The Corporate Governance Forum has records management as a standing item for its monthly meetings. The Forum is responsible for creating and implementing policies, projects and procedures relating to the RMP. This is led by the records manager (see Element 2) and will be carried out by a self-audit mechanism. The RMP states that in the future the Board may consider using the Archives and Records Management Services (ARMS) Quality Improvement Framework as a tool for measuring compliance. The Keeper believes that this would be entirely appropriate.</p> <p>The Forum reports to the Management Team which is responsible for approving of the RMP and associated policies and procedures.</p> <p>The Keeper agrees that there are mechanisms in place to ensure that the RMP and</p>

14. Shared Information	<b>G</b>	<b>G</b>	<p>associated policies and procedures are kept up to date and fit for purpose.</p> <p>The RMP states that the Board shares information in limited circumstances and that when it does it enters into agreements to ensure the confidentiality of the shared information.</p> <p>As evidence of the procedures in place, a Minute of Agreement between Scottish Electoral Registration Officers for sharing the data of 14 to 17 year olds (evidence 045) has been submitted. Section 7 of the Agreement relates to information governance.</p> <p>Also submitted is a Data Sharing Agreement between the Board and South Ayrshire Council relating to Electoral Services (evidence 046).</p> <p>Additionally, a number of policies and procedures relating to information security have also been submitted, including a Data Sharing Checklist, Procedure for Sharing Personal Data and Guidelines for Sharing Personal Data (evidence 041-043).</p> <p>The Keeper agrees that robust procedures are in place to allow the Board to share information securely and that information governance forms part of these arrangements.</p>
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## 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 Ayrshire Valuation Joint Board. Policies and governance structures are in place to implement the actions required by the plan.

Elements that require development by Ayrshire Valuation Joint Board are as follows:

**Element 6 - 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 systematic method for the destruction of electronic records) and has provided evidence that it is working towards closing this gap. As part of the agreement of this Element, the Keeper requests that he is kept informed of progress in closing the gap.**

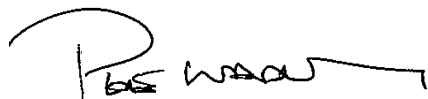
**Element 7 - The Keeper can agree this element on an 'improvement model' basis. This means that the authority has identified a gap in provision (the lack of a formal agreement between the Board and Ayrshire Archives) and has provided evidence that it is working towards closing this gap. As part of this agreement the Keeper expects to be sent a copy of the signed MoU prior to October 2016. Once he receives this the Keeper should then be able to 'fully' agree the Element. Should he fail to receive the finalised MoU the Keeper may choose to review his decision to agree this Element and, as this is a 'compulsory' Element under the Public Records (Scotland) Act 2011, this may impact his agreement of the Board's RMP.**

## 7. Keeper's Determination

Based on the assessment process detailed above, the Keeper agrees the RMP of Ayrshire Valuation Joint Board.

The Keeper recommends that Ayrshire Valuation Joint Board should publish its agreed RMP as an example of good practice within the authority and the sector.

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



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**Pete Wadley**  
Public Records Officer



.....  
**Robert Fotheringham**  
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 Ayrshire Valuation Joint Board. In agreeing this RMP, the Keeper expects Ayrshire Valuation Joint 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