

Public Records (Scotland) Act 2011

**Public Authority
Dumfries and Galloway Council, Licensing Board, Assessor and Electoral
Registration Officer and South West of Scotland Transport Partnership
(SWestrans)**

The Keeper of the Records of Scotland

12 February 2019

Contents

1. Public Records (Scotland) Act 2011 3
2. Executive Summary [3](#)
3. Authority Background [4](#)
4. Assessment Process [5](#)
5. Model Plan Elements: Checklist [6](#)
6. Keeper's Summary [25](#)
7. Keeper's Determination [25](#)
8. Keeper's Endorsement 26

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 [named public authority] by the Public Records (Scotland) Act 2011 Assessment Team following its submission to the Keeper on 16 August 2018.

The assessment considered whether the RMP of Dumfries and Galloway Council, Licensing Board, Assessor and Electoral Registration Officer and South West of Scotland Transport Partnership (SWestrans) 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 Dumfries and Galloway Council, Licensing Board, Assessor and Electoral Registration Officer and South West of Scotland Transport Partnership (SWestrans) complies with the Act can be found under section 7 of this report with relevant recommendations.

3. Authority Background

Dumfries and Galloway Council is a unitary authority which provides all local government services for the Dumfries and Galloway area. The Council Headquarters are located in Dumfries. There are 47 councillors.

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. Dumfries and Galloway Licensing Board consists of 24 Board members divided into 4 districts.

Since the enactment of the Lands Valuation (Scotland) Act 1854, Assessors have been responsible for the valuation of all heritable properties for local taxation purposes within their respective valuation areas. Currently all rateable properties are shown in the Valuation Roll and domestic subjects are contained within the Council Tax List. These documents form the basis for levying non-domestic rates (Valuation Roll) and Council Tax (Council Tax Valuation Lists). Each of the 32 Councils within Scotland is a valuation authority and responsible for appointing an Assessor who must in turn compile and maintain a Valuation Roll and a Council Tax Valuation List.

South West of Scotland Transport Partnership (SWestrans) is one of seven Regional Transport Partnerships in Scotland and covers an area contiguous within the boundaries of Dumfries and Galloway Council. The Partnership Board consists of five Councillor members and two external members, one from Scottish Enterprise and one from NHS Dumfries and Galloway.

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 Dumfries and Galloway Council, Licensing Board, Assessor and Electoral Registration Officer and South West of Scotland Transport Partnership’s (SWestrans) RMP was developed with proper regard to the elements of the Model Plan and is compliant with the Act. The assessment also considered whether there was sufficient supporting evidence of such compliance.

Key:

G	The Keeper agrees this element of an authority’s plan.		A	The Keeper agrees this element of an authority’s plan as an ‘improvement model’. This means that he is convinced of the authority’s commitment to closing a gap in provision. He will request that he is updated as work on this element progresses.		R	There is a serious gap in provision for this element with no clear explanation of how this will be addressed. The Keeper may choose to return the RMP on this basis.
----------	--	--	----------	--	--	----------	--

5. Model Plan Elements: Checklist

Element	Present	Evidence	Notes
1. Senior Officer <i>Compulsory element</i>	G	G	<p>The Records Management Plan (RMP) of Dumfries and Galloway Council, Dumfries and Galloway Licensing Board, the Assessor and Electoral Registration Officer (ERO) for Dumfries and Galloway and South West of Scotland Transport Partnership (SWestrans) (hereafter referred to as 'the Council' for ease of reference) identifies Lorna Meahan, Director of Corporate Services, as the individual with senior responsibility for records management.</p> <p>The covering letter accompanying the RMP from Ms Meahan states that the RMP is a full voluntary re-submission under Section 5(6) of the Public Records (Scotland) Act 2011.</p> <p>The RMP is also accompanied by another letter from Ms Meahan (evidence 001) which states that the RMP has been amended to provide updates on the current provisions within the Council and the other public authorities listed above and confirms her strategic responsibility for records management.</p> <p>Page 6 of the Records Management Policy (evidence 002) also confirms that the Director of Corporate Services has senior management responsibility for records management. The Policy also states that the Director of Corporate Services acts as the Council's Senior Information Risk Owner (SIRO).</p> <p>The Keeper agrees that the Council has identified an appropriate individual to take senior management responsibility for records management as required by the Public Records (Scotland) Act 2011.</p>
2. Records	G	G	The RMP identifies Lindsay Turpie, Records and Information Management Officer,

<p>Manager <i>Compulsory element</i></p>			<p>as the individual with day-to-day operational responsibility for records management. The RMP also specifically states that she is responsible for the management of the records of all of the authorities covered in the common RMP.</p> <p>Ms Turpie’s appointment to this role is confirmed in the covering letter from the Director of Corporates Services (evidence 001) (see Element 1) which was submitted along with the RMP.</p> <p>Page 6 of the Records Management Policy (evidence 002) also confirms that the Records and Information Officer has day-to-day operational responsibility for records management.</p> <p>Ms Turpie’s Job Description and Person Specification (evidence 003) has also been provided. This clearly shows that she has responsibility for ensuring compliance with the Public Records (Scotland) Act 2011. A key part of this role is raising the profile of records and information management across the Council.</p> <p>A letter from the Clerk to the Dumfries and Galloway Licensing Boards has been submitted (evidence 039). This states that the Licensing Boards agree to comply with the common RMP and associated policies and procedures as well as agreeing to have their records managed by the Records and Information Management Officer.</p> <p>A similar letter from the Assessor and ERO has been received (evidence 040) confirming that it agrees to comply with the requirements of the common plan and that the Records and Information Management Officer is responsible for the management of its records.</p> <p>A similar letter from the Lead Officer of SWestrans was submitted prior to the submission of the RMP.</p>
--	--	--	---

			<p>The Keeper agrees that an appropriate individual has been identified to take day-to-day operational responsibility for records management for the authorities covered by the common RMP.</p>
<p>3. Policy <i>Compulsory element</i></p>	<p>G</p>	<p>G</p>	<p>The RMP states that ‘The Council is committed to establishing and maintaining good record keeping practices which meet business needs, comply with legal, statutory and regulatory obligations and demonstrate transparency and accountability to all its stakeholders’.</p> <p>In order to achieve this, the Council has produced and submitted their Records Management Policy, version 3.0 approved on 14 September 2017 by the Policy and Resources Committee (evidence 002). The Policy acknowledges that records are one of the Council’s most vital assets and that it applies to all records irrespective of medium or format. It also applies to all staff, Elected Members, volunteers and third parties who create and capture records relating to the functions of the public authorities listed in Element 1.</p> <p>The Policy (page 4) also outlines the importance of and benefits to be gained from effective records management, such as more informed decision making and quicker retrieval of information.</p> <p>The Policy (page 5) outlines the Council’s Records Management Programme which includes the implementation of a classification scheme and retention schedules and identification and protection for vital records. The Programme also contains a commitment to implement an Electronic Document and Records Management System (EDRMS) which is anticipated to assist with the delivery of the requirements of the Policy.</p> <p>The Policy (pages 6 and 7) describe the roles and responsibilities for complying with the described records management requirements, including the responsible officer’s</p>

			<p>identified in Elements 1 and 2.</p> <p>Page 8 of the Policy describes the Council’s commitment to providing staff with training. New staff are made aware of this policy and other related information governance policies at induction. The Council has developed e-Learning modules for records management and retention schedules. Screenshots have been supplied showing the format of these modules (evidence 008 and 024). The Keeper commends this strong commitment to making staff aware of their records management responsibilities.</p> <p>The RMP states that the Policy is published along with other records management policies, procedures and guidance in the Records Management Toolbox on the Council’s intranet. A screenshot has been supplied (evidence 025) showing the availability of the Policy and other information governance documents.</p> <p>The Keeper agrees that the Council has an operational records management policy statement which staff are able to access.</p>
<p>4. Business Classification</p>	<p>A</p>	<p>G</p>	<p>The Council has created a three-level Business Classification Scheme (BCS) which is arranged around its business functions. The Keeper considers a functional BCS to be currently best practice as these are more likely to be more robust in the event of any re-organisation. Below the top level functions the BCS is arranged by activity and transaction. The BCS has been submitted (evidence 004). It includes the records of Licensing Board, Assessor and ERO and SWestrans activities.</p> <p>The use of the BCS is governed by the Council’s BCS Policy (evidence 005). The Policy describes what a BCS is and explains the benefits of its use. The Policy also confirms the use of the BCS as a structure for the development and implementation of an EDRMS.</p> <p>A screenshot has been supplied (evidence 025) showing the availability to staff of</p>

			<p>the BCS, the BCS Policy and other information governance documents.</p> <p>The RMP states that the BCS has not been implemented across the Council’s shared drives. The Council are currently undertaking a project to implement SharePoint 2016 as an EDRMS. This will include additional records management functionality through an add-on provided by a third party. The RMP states that the BCS will be used to underpin the design of the EDRMS. The RMP states that the SharePoint 2016 infrastructure has been built on the Council’s servers and the third party software has been installed and configured. Work to pilot the EDRMS prior to it being rolled out across the rest of the organisation is ongoing. Screenshots of the Pentana corporate reporting system have been submitted (evidence 041). This shows that the Council is aiming for full implementation of the EDRMS by the end of December 2019. The Keeper requests that he is kept informed of the progress of this work.</p> <p>The Keeper can agree this Element on an ‘improvement model’ basis. This means that the authority has identified a gap in provision (the lack of a fully implemented BCS) and has evidenced how it intends to close this gap. This agreement is dependent upon the Keeper being kept informed on the progress of work to close the identified gap.</p>
5. Retention schedule	A	G	<p>The RMP states that the Council’s retention schedules have been based on the Scottish Council on Archives Records Retention Schedules (SCARRS). They were also developed with input from individual services and also from the Council Archivist. The Keeper recognises that SCARRS is an appropriate tool upon which to build an authority’s retention schedules and commends the inclusion of staff from local business areas in developing these as this is likely to result in a stronger business tool.</p> <p>The retention schedules are arranged in line with the functions of the Council and</p>

			<p>were comprehensively reviewed and standardised in 2016. The Keeper commends basing retention schedules on the functions of an authority as these are less likely to be impacted by organisational change such as re-organisations. There are 42 schedules in total and a sample of 10 of these have been submitted (evidence 006), including those for the Assessor and Electoral and SWestrans.</p> <p>The use of retention schedules within the Council is governed by the Records Retention Schedule Policy (evidence 007). This outlines to staff what retention schedules are, why they are important and how and when staff should use them. The Keeper commends the production of this very useful policy document.</p> <p>The RMP states that the retention schedules are published on the Records Management Toolbox and are therefore accessible to staff. A screenshot has been supplied (evidence 025) showing the availability of the Toolbox.</p> <p>The Council has developed an eLearning module on records retention schedules in order to provide staff with support and training in the application of retention schedules. A screenshot of the eLearning module has been submitted (evidence 008). The Keeper commends this commitment to staff training in the use of retention schedules.</p> <p>As mentioned in Element 4, the Council are currently implementing an EDRMS in the form of SharePoint 2016 with additional records management functionality. It is anticipated that this will allow the Council to better apply retention periods to currently unstructured information as well as making it easier to dispose of records at in line with the schedules. The RMP explains that as part of the EDRMS roll out, shared drives will be phased out and all unstructured information will be moved to EDRMS. In preparation for this work, staff will review the information held on their email and shared drives in line with the retention schedules. This will also assist in the Council's</p>
--	--	--	--

			<p>rationalisation and Smarter Working programme. Screenshots of the Pentana corporate reporting system have been submitted (evidence 041). This shows that the Council is aiming for full implementation of the EDRMS by the end of December 2019. The Keeper requests that he is kept informed of the progress of this work.</p> <p>The Keeper can agree this Element on an ‘improvement model’ basis. This means that the authority has identified a gap in provision (the implementation of retention schedules as part of the project to develop and roll out the EDRMS) and has evidenced how it intends to close this gap. This agreement is dependent upon the Keeper being kept informed on the progress of work to close this gap.</p>
<p>6. Destruction Arrangements <i>Compulsory element</i></p>	<p>G</p>	<p>G</p>	<p>The RMP states that the Council recognises the importance of the secure destruction of redundant information and that proper destruction arrangements allow the Council to retain records only for as long as they are required. The Council has also created a Records Destruction Arrangements Policy (evidence 009) which details the procedures for the secure destruction of records and information. The Policy is available on the Records Management Toolbox and a screenshot has been supplied showing its location (evidence 025). The procedures are as follows:</p> <p>Paper (on-site) – The Council has described its arrangements for the destruction of paper records. All records must be destroyed in line with the requirements of the retention schedules. The Council engages two contractors to securely dispose of paper records (Restore Data Shred and Shred-It). Secure consoles for confidential waste are available in Council premises and these are regularly uplifted and securely destroyed. A sample destruction certificate has been submitted (evidence 010) showing that these procedures are operational.</p> <p>Paper (off-site) – The Council maintains an off-site records store for semi-current records. To govern the transfer of records to the store, the Council has created a</p>

			<p>Record Store Procedures document (evidence 042). This outlines the processes in place for staff to follow when transferring records to the store. Transfers to the records store are accompanied by a Record Store Transfer List (evidence 043) which must specify a review/disposal date. Records with the same review/disposal date will be boxed together. The information from the List is entered onto the Council's EDRMS and the Records and Information Management Officer will run periodic reports to identify boxes at the end of their retention periods. These reports are then sent to the relevant information asset owners for a disposal decision. If this is destruction, the records are destroyed in line with the Council's procedures for the destruction of paper records (see above).</p> <p>Electronic – It is expected that the implementation of the EDRMS will make it easier to apply retention periods and disposal actions to previously unstructured data. Section 4 of the Records Destruction Arrangements Policy (evidence 009) states that the destruction of redundant records should be conducted in accordance with retention schedules on a day-to-day basis by all staff. Section 5 of the Policy then goes on to outline how staff should dispose of records, irrespective of format. Section 5.4.2 specifically relates to electronic records-these are generally destroyed in two stages, with links and references being removed in the first and the background data deleted in the second stage. The Council considers electronic records to be fully destroyed when they are no longer easily recoverable.</p> <p>Hardware – The RMP states the destruction of obsolete hardware and software is carried out by an external contractor (CCL (North) Limited). This was originally a joint agreement with Falkirk Council but is now a sole agreement with Dumfries and Galloway Council. The Council has submitted a sample destruction certificate (evidence 044), showing that the arrangements for the destruction of obsolete hardware are operational.</p> <p>Back-ups – As described in Element 10 of the RMP, the Council regularly backs up</p>
--	--	--	---

			<p>its electronic records and systems to mitigate against a disaster. The RMP states that the Council's IT team are responsible for maintaining these back-ups and for retrieving them when required. Back-ups are taken daily. Section 6.2 of the Records Destruction Arrangements Policy (evidence 009) states that all copies of a record are identified and destroyed, including back-ups. A description of the back-up procedures and retention times has been supplied (evidence 045).</p> <p>Section 5.5 of the Records Destruction Arrangements Policy (evidence 009) highlights the importance of documenting the destruction of records so that the Council knows which records have been destroyed, when they were destroyed, why, by whom and who gave authority for destruction.</p> <p>Section 5.5 of the Records Destruction Arrangements Policy (evidence 009) highlights the importance of maintaining a record of destruction. A screenshot of the system used to log destruction has been supplied (evidence 046). The Keeper commends the Council's commitment to ensuring that it keeps a record of the destruction of records scheduled for destruction to comply with legislative requirements.</p> <p>Also submitted is an email encouraging staff to take time to review and cleanse their paper and electronic records. The Keeper commends this proactive approach to enabling staff to take responsibility for the records they manage.</p> <p>The Future Developments section states that work has been undertaken with procurement colleagues to review confidential waste contracts with the aim of having a single provider. The Keeper requests that updates are provided if there are any substantive changes to procedures.</p> <p>The Keeper agrees that the Council has procedures in place to allow it to securely dispose of records in accordance with their retention schedules.</p>
--	--	--	--

<p>7. Archiving and Transfer <i>Compulsory element</i></p>	<p>G</p>	<p>G</p>	<p>The Council has identified its own Archive Service as the place of deposit for records selected for permanent preservation. Bi-monthly meetings take place between the Records and Information Management Officer (see Element 2) and the Council Archivist to review progress in archiving of Council records. The Keeper commends the development of an effective working relationship with the Council Archivist.</p> <p>The Council has developed a Records Archiving and Transfer Arrangements Policy (evidence 011). The Policy sets out the procedures to be followed when records identified for long-term preservation in retention schedules reach the end of their retention periods. The Council Archivist is also involved in the decision-making process to authorise the transfer of records to the archive and provided expertise in the development in the Policy.</p> <p>The transfer of records to the archive should be accompanied by a signed Records Transfer Authorisation Form and by completing the Records Archiving Transfer List. These both appear as appendices to the Policy and are available, along with the Policy, to staff on the Council’s Records Management Toolbox, which is evidenced by a screenshot of the Toolbox (evidence 025).</p> <p>Also supplied as evidence is a copy of an email sent to Council staff entitled ‘Did you know.....we have an Archive Service?’ This highlights to staff the existence of the service, provides guidance on archiving procedures and directs staff to the Records Archiving and Transfer Procedures. The Keeper commends this as an excellent example of raising awareness of the importance of ensuring records selected for permanent preservation are transferred to a suitable archive.</p> <p>The Future Developments section of this Element states that the Council, at present, does not have a Digital Preservation strategy. One will be developed in line with best practice and in the meantime service areas are responsible</p>
--	-----------------	-----------------	---

			<p>for assisting in the preservation of digital records until a solution has been developed. This is a common issue among public authorities, particularly local authorities, and the Keeper welcomes the recognition of the problems associated with digital preservation and looks forward to being kept informed as the Council develops a solution.</p> <p>The Keeper agrees that the Council has arrangements in place to allow it to transfer records to a suitable archive in accordance with the requirements of its records retention schedules.</p>
<p>8. Information Security <i>Compulsory element</i></p>	<p>G</p>	<p>G</p>	<p>The RMP states that the security of all Council records and information is managed through the application of the Records Management Procedures and Standards (evidence 012), Acceptable Use Policy (evidence 013) and Security Classification Scheme (evidence 014).</p> <p>The Records Management Procedures and Standards document describes the processes in place to protect the information created, collected and managed by the Council. It emphasises the importance of secure, timely destruction of records in line with the retention schedules, of managing emails appropriately, maintaining the security of records and of complying with the regulatory framework around records and information. The document is available to staff in the Records Management Toolbox area of the Council's intranet (evidence 025).</p> <p>The Acceptable Use Policy details the measures in place to protect the Council's information and systems. It covers the use of the internet, email and social media. It also covers access controls, passwords, use of encryption, and use of Council computer equipment. It also contains procedures for reporting security incidents and contains a Security Incident Report Form as an appendix.</p> <p>The Security Classification Scheme details the Council's levels of security classification applied to its records and the steps to be taken to protect them. It also</p>

			<p>states that hard copy records should be securely locked away.</p> <p>The RMP states that all staff at induction are required to undertake information security and Data Protection training. This includes physical and building security. A screenshot of the eLearning module has been submitted (evidence 015).</p> <p>Also supplied is an Information Security at Work poster (evidence 037) which advises staff to lock away confidential records when not at their desks, keep passwords secure and protecting information when out of the office. The Keeper commends the use of posters as an effective way of raising awareness of information security procedures.</p> <p>The Future Developments section of this Element that the Council is undertaking a number of initiatives to further improve the protection of its records and information. The Keeper requests to be kept informed of these initiatives.</p> <p>The Keeper agrees that there appropriate measures in place to protect the information and records created and managed by the Council.</p>
9. Data Protection	G	A	<p>The RMP was originally submitted prior to May 2018 and states that the Council fully endorses and adheres to the principles of the Data Protection Act 1998 and that it is working towards full compliance with the Data Protection Act 2018. Its Data Protection Policy (evidence 016) describes the processes in place to protect personal information. It outlines the eight principles of Data Protection, describes its scope and allocates responsibilities for compliance. The RMP states that the Policy is available on the Council's intranet. A screenshot of the Council's Data Protection site (evidence 047) has been submitted. This shows that the Policy is available to staff.</p> <p>The Future Developments section of the Element states that the Policy will be reviewed in line with the General Data Protection Regulation (GDPR) and</p>

			<p>related UK Data Protection legislation. It also states that the refreshed Policy will be presented to the Policy and Resources Committee in January 2019. The Keeper requests that he is provided with the updated Policy when it becomes available.</p> <p>The Council is registered as a Data Controller with the Information Commissioner's Office (registration number: Z5477233).</p> <p>The RMP states that all Council staff are required to undertake a mandatory Data Protection eLearning module. A screenshot of the module has been supplied (evidence 017). In addition a screenshot of the training module relating to GDPR and changes to Data Protection Law has been provided (evidence 048). The Keeper commends the recognition that staff will need to be provided with training in relation to the new data protection regime.</p> <p>Also submitted is a copy of the Council's 'Your Guide to Preparing for the Changes to the Data Protection Law' brochure (evidence 049). This guide explains what Data Protection is, what has changed under the new legislation and what this means for Council staff.</p> <p>The Data Protection page on the Council's website provides its stakeholders with information about how the Council deals with personal information. It also provides information on how to submit a Subject Access Review. http://www.dumgal.gov.uk/article/15129/Data-protection. There is also a good description of stakeholders' rights on the Privacy Statement on the Council's website at http://www.dumgal.gov.uk/privacy.</p> <p>Provided the Keeper is sent a copy of the updated Data Protection Policy once it has been approved, he should be able to agree that the Council is aware of its responsibilities with regards to Data Protection and provides appropriate</p>
--	--	--	---

			training for its staff.
10. Business Continuity and Vital Records	G	G	<p>The Council's Information Asset Register describes the information assets held by each service area. It identifies the Information Asset Owners, the personal information held in that area, the format the information is held in and which system is used to manage it, and the security classification applied to the information. It is also used to identify the potential risks relating to the information. Extracts from the Information Asset Register have been supplied (evidence 018).</p> <p>The RMP states that each key service area is required to have a Business Continuity Plan (BCP) in place which describes the actions to be taken recover critical business activities in the event of an incident. A log of critical functions is held by the Resilience and Community Safety service which is overseen by the Director of the Communities Directorate. A sample BCP for Business and Technology Solutions Service has been submitted (evidence 019).</p> <p>The Council regularly backs up its electronic records and systems to mitigate against a disaster. The RMP states that the Council's IT team are responsible for maintaining these back-ups and for retrieving them when required. Back-ups are taken daily. This allows electronic records to be restored in the event of an interruption to normal business. The procedures for this are detailed in a document (evidence 045) which has been supplied as evidence.</p> <p>Semi-current paper records are protected by being sent to an offsite record store. The processes for governing the transfer of records to the store are described in the Record Store Procedures document (evidence 042).</p> <p>The Keeper is able to agree that the Council can recover its records in the event of a disaster.</p>
11. Audit trail	A	G	The Council uses a number of systems to manage its records, namely line-of-

			<p>business systems, an EDRMS in the form of SharePoint with additional records management functionality and paper records.</p> <p>The Council utilises a number of bespoke systems, in particular for the management of sensitive personal information. For example, electronic social work records are managed using a system called MOSAIC. User access is restricted and there are a number of levels of access depending on the permissions granted to members of staff. Reports can be produced showing who has accessed and amended records. Screenshots of the system have been submitted (evidence 021).</p> <p>For human resources and payroll records a system called iTrent is used. Amendments to the system can be audited and staff members making changes to employee files can be identified. Full access to the system is limited to a small number of system administrators. Screenshots of the system have been provided (evidence 020).</p> <p>Finance records are managed using Integra. Audits of the system's usage can be conducted and screenshots showing this have been supplied (evidence 022).</p> <p>The Council is also in the process of implementing SharePoint 2016 with added records management functionality as an EDRMS. This will allow the Council to impose greater control over currently unstructured information. As the EDRMS is rolled out the use of shared drives will be phased out and the Council will also move towards greater use of electronic records. The EDRMS will be able to support robust audit trail provision, version control and the tracking and retrieval of electronic records. A sample of the audit trail functionality of SharePoint 2016 and the additional EDRMS functionality has been provided (evidence 050). Screenshots of the Pentana corporate reporting system have been submitted (evidence 041). This shows that the Council is aiming for full implementation of the EDRMS by the end of December 2019.</p>
--	--	--	--

			<p>The Keeper requests that he is kept informed of the progress of this work.</p> <p>The RMP states that hard-copy social work files are held in a record store. These have been catalogued using a database which includes the service user’s details, file box number and shelf number so that files can be more easily located. The Council has created a File Movement Form to track the location of these files. A copy of the template Form has been supplied (evidence 023).</p> <p>The RMP also states that all boxes in the record store have been barcoded allowing the movements of records to be easily tracked. The audit trail information is retained after the records have been destroyed to evidence this.</p> <p>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 audit trail provision for currently unstructured electronic records) and has outlined how it intends to close this gap. This agreement is dependent upon the Keeper being regularly informed of the progress of this work.</p>
<p>12. Competency Framework for records management staff</p>	<p>G</p>	<p>G</p>	<p>The Council has a dedicated Records and Information Management Officer to implement the RMP. She also has operational day-to-day responsibility for records management within the Council (see Element 2). The Records and Information Management Officer’s job description and person specification (evidence 003) confirms these key responsibilities.</p> <p>The Council has a Corporate Development Unit which is committed to ensuring that staff have access to a range of training opportunities.</p> <p>Section 4.2 of the Records Management Policy (evidence 002) contains a commitment to make records management training readily available to staff. To this end, the Council has developed a mandatory records management eLearning module for all staff. Screenshots of this training have been provided (evidence 024).</p>

			<p>Reports showing who has completed the training can be created and are reported to the Business Management Group, who then promote uptake to their directorates. The RMP states that training and support will be provided as the EDRMS is rolled out across the organisation.</p> <p>The RMP states that in November 2016 all policies, procedures and guidance relating to records and information management were reviewed and standardised and published as the Records Management Toolbox. This provides staff with a useful single point of reference for guidance on records and information management. A screenshot showing the availability of policies and procedures on the Toolbox has been submitted (evidence 025). Also provided is an email (evidence 026) from the Director of Corporate Services (see Element 1) encouraging all staff to use the Toolbox and making them aware of all the support available to help raise awareness of their responsibilities.</p> <p>The Council has also produced a series of posters to highlight records management issues. These include 'Records Management: Where to Start' and a series of posters with FAQs relating to records management, email management and retention scheduling and archiving (evidence 032-037). The Keeper commends the use of these posters as an excellent way of raising staff awareness of records management.</p> <p>The RMP also states that the Council has created a network of Records Management Champions from across its Directorates. The Champions' role is to promote, support and monitor good record keeping practices within their service areas. The Champions Group meets with the Records and Information Officer, and other key staff such as the Council Archivist when necessary, on a quarterly basis to discuss progress and identify issues. A document describing the role of the Records Management Champions has been supplied (evidence 051). The Keeper commends the use of a network of Records Management Champions as this should</p>
--	--	--	---

			<p>assist the Records and Information Management Officer and should also promote consistency of practice across the authority.</p> <p>The Keeper agrees that the Council recognises the importance of records management and is committed to providing staff with appropriate training and guidance.</p>
<p>13. Assessment and Review</p>	<p>G</p>	<p>G</p>	<p>The Council is committed to ensuring that the RMP is kept up-to-date. The Records and Information Management Officer (see Element 2) is responsible for conducting the annual review of the RMP and associated policies and procedures.</p> <p>The Council currently uses the JISC infoNet Records Management Maturity Model to self-assess its records management provisions. A sample of the assessment form has been supplied showing maturity levels as at February 2018 (evidence 027). There are a number of actions, such as the implementation of the EDRMS, and these are built in to the RMP. The RMP also states the intention to use the National Records of Scotland's Progress Update Review (PUR) self-assessment mechanism to report progress to the Keeper. Additionally, the voluntary formal re-submission of the RMP under Section 5(6) of the Public Records (Scotland) Act 2011 shows a strong commitment to ensuring that records management arrangements are regularly reviewed and updated and this is commended by the Keeper.</p> <p>The RMP and the Records Management Policy are approved by the Policy and Resources Committee. Records management progress and issues are reported to the Business Management Group and the Corporate Services Programme Executive. As a key area of the Council's work, progress of the Records Management Programme is reported through the corporate reporting system Pentana. Screenshots of the Pentana corporate reporting system have been submitted (evidence 041) showing how progress is reported.</p> <p>The RMP states that the Information Management Group is responsible for the</p>

			<p>develop of information management, including Data Protection measures and processes within the Council, quality assurance of processes, to consider requests for information sharing and development of protocols and to ensure learning and action is identified for all Council services. A document outlining the membership and remit of the Information Management Group (evidence 052) has been provided. Membership of the Group is drawn from across the Council and is chaired by the Director of Corporate Services (see Element 1). The Group reports quarterly to the Senior Leadership Team.</p> <p>The Keeper agrees that there are processes in place to ensure that the Council's RMP and associated policies and procedures are regularly assessed and kept up-to-date.</p>
14. Shared Information	G	G	<p>The RMP states that in certain circumstances the Council shares information with third parties. In order to govern the sharing of information, the Council signed up in 2012 to the Scottish Accord for the Sharing of Personal Information (SASPI) along with partners from the Dumfries and Galloway area, such as the NHS, Police, and Fire and Rescue. The Keeper is aware of SASPI and recognises that it is commonly used by Scottish public authorities.</p> <p>SASPI identifies the commitments required by each partner involved to ensure secure information sharing. Specific instances of information sharing are administered by Information Sharing Protocols (ISPs). Sample ISPs have been submitted showing how these arrangements work in practice (evidence 028 and 029). These also cover the governance of the information being shared.</p> <p>The Council states that the Scottish Government has issued an Information Sharing Framework to replace SASPI. The RMP states that the Council is currently working to adopt the new framework over the coming months. As a result it will also review its information sharing arrangements and will also ensure that these are compliant with GDPR and the revised UK Data Protection legislation. The RMP commits the</p>

			<p>Council to updating related policies and guidance. The Keeper will need to be kept updated as this work progresses and sent any revised policies and procedures.</p> <p>The Keeper agrees that the Council has procedures in place to ensure that information is shared securely with other bodies.</p>
--	--	--	---

6. Keeper’s Summary

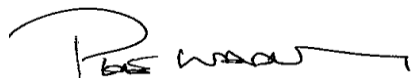
Elements 1-14 that the Keeper considers should be in a public authority records management plan have been properly considered by Dumfries and Galloway Council, Licensing Board, Assessor and Electoral Registration Officer and South West of Scotland Transport Partnership (SWestrans). Policies and governance structures are in place to implement the actions required by the plan.

7. Keeper’s Determination

Based on the assessment process detailed above, the Keeper agrees the RMP of Dumfries and Galloway Council, Licensing Board, Assessor and Electoral Registration Officer and South West of Scotland Transport Partnership (SWestrans).

The Keeper recommends that Dumfries and Galloway Council, Licensing Board, Assessor and Electoral Registration Officer and South West of Scotland Transport Partnership (SWestrans) 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,



.....
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 Dumfries and Galloway Council, Licensing Board, Assessor and Electoral Registration Officer and South West of Scotland Transport Partnership (SWestrans). In agreeing this RMP, the Keeper expects Dumfries and Galloway Council, Licensing Board, Assessor and Electoral Registration Officer and South West of Scotland Transport Partnership (SWestrans) to fully implement the agreed RMP and meet its obligations under the Act.



Laura Mitchell
Deputy Keeper of the Records of Scotland