National Records of Scotland

Public Records (Scotland) Act 2011

**Falkirk Council
Falkirk Licensing Board**

The Keeper of the Records of Scotland

16th November 2021

Contents

1. Public Records (Scotland) Act 2011

The Public Records (Scotland) Act 2011 (the Act) received Royal assent on 20 April 2011. It is the first new public records legislation in Scotland since 1937 and came fully into force on 1 January 2013. Its primary aim is to promote efficient and accountable record keeping by named Scottish public authorities.

The Act has its origins in *The Historical Abuse Systemic Review: Residential Schools and Children's Homes in Scotland 1950-1995* (The Shaw Report) published in 2007. The Shaw Report recorded how its investigations were hampered by poor record keeping and found that thousands of records had been created, but were then lost due to an inadequate legislative framework and poor records management. Crucially, it demonstrated how former residents of children's homes were denied access to information about their formative years. The Shaw Report demonstrated that management of records in all formats (paper and electronic) is not just a bureaucratic process, but central to good governance and should not be ignored. A follow-up review of public records legislation by the Keeper of the Records of Scotland (the Keeper) found further evidence of poor records management across the public sector. This resulted in the passage of the Act by the Scottish Parliament in March 2011.

The Act requires a named authority to prepare and implement a records management plan (RMP) which must set out proper arrangements for the management of its records. A plan must clearly describe the way the authority cares for the records that it creates, in any format, whilst carrying out its business activities. The RMP must be agreed with the Keeper and regularly reviewed.

2. Executive Summary

This report sets out the findings of the Keeper's assessment of the RMP of Falkirk Council and Falkirk Licensing Board by the Public Records (Scotland) Act 2011 Assessment Team following its submission to the Keeper on 30th July 2020.

The assessment considered whether the RMP of Falkirk Council and Falkirk Licensing Board was developed with proper regard to the 15 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 Falkirk Council and Falkirk Licensing Board complies with the Act can be found under section 7 of this report with relevant recommendations.

3. Authority Background

Falkirk is one of 32 unitary authority council areas of Scotland. It was formed on 1 April 1996 by way of the Local Government etc. (Scotland) Act 1994 from the exact boundaries of Falkirk District, one of three parts of Central Region (1975-1996) and part of the historic county of Stirlingshire (pre 1975). A small part, namely Bo'ness and Blackness, was part of the former county of West Lothian.

The council area borders with North Lanarkshire, Stirlingshire, West Lothian, Clackmannanshire and Fife. The largest town, and the location of the council headquarters, is Falkirk; other notable towns include Bo'ness, Bonnybridge, Denny, Grangemouth, Larbert, Polmont, Shieldhill and Stenhousemuir.

Falkirk Council

Falkirk Council Licensing Board deals with the granting of licences for the sale and supply of alcohol and for various gambling activities. The members of the Board are appointed by Falkirk Council. Applications for licenses are made to the Licensing Section who provide the day to day administrative support to the Board.

Licensing Board & governance | Falkirk Council

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 Falkirk Council and Falkirk Licensing Board's RMP was developed with proper regard to the elements of the Model Plan and is compliant with the Act. The assessment also considered whether there was sufficient supporting evidence of such compliance.

Key:

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

5. Model Plan Elements: Checklist

Falkirk Council and Falkirk Licensing Board
(for simplicity the two separate authorities will be referred to as 'the Council' in the assessment below)

Element	Present	Evidence	Notes
1. Senior Officer	**G**	**G**	The Public Records (Scotland) Act 2011 (the Act) requires that an individual senior staff member is identified as holding corporate responsibility for records management in a public authority. Falkirk Council have identified Kenneth Lawrie, Chief Executive, as the individual with overall responsibility for records management in the organisation. Falkirk Licensing Board have identified Colin Moodie, Clerk to Falkirk Council Licensing Board, as the individual with overall responsibility for records management in the Licensing Board. The identification of the Chief Executive of the Council to this role is supported by a *Covering Letter* from Mr Lawrie (see under General Comments below) and by the *Records Management and Preservation of Archival Records Policy* (see element 3) section 5 "Individual Responsibilities for Records Management". The identification of the Clerk to the Licensing Board to this role is supported by a *Covering Letter* from Mr Moodie.

			Both officers endorse the *Records Management Plan* (the *RMP*) in their respective *Covering Letters*. The Chief Executive of Falkirk Council has provided a supporting statement as an introduction to the *Records Management and Preservation of Archival Records Policy*. The Keeper agrees that Falkirk Council and Falkirk Licensing Board have both identified an appropriate individual to this role as required by the Public Records (Scotland) Act (the Act).
2. Records Manager	**G**	**G**	The Act requires that each authority identifies an individual staff member as holding operational responsibility for records management and has appropriate corporate responsibility, access to resources, and skills. Falkirk Council and Licensing Board have identified Suzanne O'Reilly, Records Manager, as the individual with day-to-day responsibility for implementing the *RMP*. The identification of the Records Manager to this role is supported by *Covering Letters* from Mr Lawrie and from Mr Moodie (see element 1) and by the *Records Management and Archives Policy* (see element 3) for example section 5.3. It is also supported by the *Records Manager Achievement and Personal Development Plan* and by the *Records Manager Job Description*, both of which have been provided to the Keeper. The Council makes the following statement in the *Records Management Plan* (page 28): "The Council recognises that records management is an entirely separate function from general office duties and acknowledges the importance of records management with a Records Manager post and dedicated Corporate Records Team

(CRT) on the current establishment." The Keeper commends this recognition.

The Records Manager is the author of *Managing Electronic Records Data Cleansing Guidelines* (see element 6) and *Guidance on Version Control* (see element 11) and was involved in the creation of the *Council's Guidelines on Secure Transmission of Information by Mail and Email* (see element 14).

The Records Manager prepared the *Records Management Plan.*

Falkirk Council uses a competency framework based on one issued by the Archives and Records Association, which outlines what the Council considers as the necessary skills and experience required by the Records Manager. A copy of this competencies document has been provided to the Keeper.

The Council has recently provided funding to allow the Records Manager to undertake a post-graduate Diploma in Archives and Records Management. The Keeper acknowledges this allocation of resources as a positive development. The course was successfully completed in May 2021 and a certificate from the university has been provided as evidence.

The Records Manager reports directly to the Council's Information Governance Manager. It is a requirement in the *Information Governance Work Plan* (June 2018 version), which has been supplied to the Keeper, that the Records Manager is responsible for ensuring that "procedures, guidance and relevant staff training…are reviewed annually (or more frequently if required) and [are] up-to-date."

The Keeper agrees that Falkirk Council and Falkirk Licensing Board have identified an appropriate individual to this role as required by the Act.

3. Policy	**G**	**G**	The Act requires an authority to have an appropriate policy statement on records management.
			The Council has a *Records Management and Preservation of Archival Records Policy* (the *Policy*). The Keeper has been provided with a copy of this *Policy*. This is the version signed by the Council's Chief Executive (see element 1) on 26th June 2020.
			The *Policy* is publically available on the Council website: Records Management and Preservation of Archival Records Policy (falkirk.gov.uk)
			The Keeper agrees that the *RMP* supports the objectives of the *Policy*.
			The *Policy* (section 2.3) confirms that it applies to all records created, received and managed by all employees, partners and third parties of Falkirk Council, Falkirk Council Licensing Board and Falkirk Community Trust.
			The *Policy* includes a welcome aspiration: To "develop, promote and encourage a records management culture where Services recognise the value and benefits of effective records management." (*Policy* section 3.1 page 5).
			The *Policy* mentions the Public Records (Scotland) Act 2011 and explains to staff the key records management principles:
			"Records management: • allows us to recognise the information and records we hold; • allows the information and records to be easily accessed and retrieved; • assists the Council to meet business and legislative requirements; • supports the decision making process; • defines vital records (which are included in business continuity plans); and

			• realises financial savings through effective storage arrangements." (*Policy* section 1.4) The Keeper agrees these principles. The processes in place in the Council to ensure these principles are effectively pursued are laid out in the elements below. The Keeper agrees that Falkirk Council and Falkirk Licensing Board have a formal records management policy statement as required by the Act.
4. Business Classification	**A**	**G**	The Keeper of the Records of Scotland (the Keeper) expects that the public records of an authority are known and are identified within a structure. The purpose of this element is to demonstrate in the *RMP* that the authority takes account of all the records created by the entire organisation and all its various business activities. Falkirk Council commit that any public record "received or created is stored appropriately and is easily retrievable". (*RMP* page 8). Structure for managing the Council's public records The Council has developed a combined *Business Classification Scheme* and *Retention Schedule* (see element 5) which has been supplied to the Keeper (version 1.1). This scheme has been based on that supplied, as guidance, by the Scottish Council on Archives: Scottish Council on Archives Record Retention Schedules (SCARRS) - Scottish Council on Archives (scottisharchives.org.uk) The Keeper notes that in Falkirk Council's original *RMP* (agreed August 2013) the authority planned to strengthen their *Business Classification Scheme* by adding retention for example. The Keeper is happy to acknowledge that the objective set in

the 2013 *RMP* has now been achieved.

The combined *Business Classification Scheme* and *Retention Schedule* is available to service users publically at: Business Classification & Retention Schedule - All Schedules (falkirk.gov.uk). This publication is commended.

However, the *RMP* notes (section 4.3) that the "BCS is generally not implemented throughout the Council's shared drives, both in relation to structure and retention." This clearly shows a gap in provision. The Keeper acknowledges, however, that the authority has identified an improvement project to close that gap (see under <u>Digital Shared Drives</u> below).

As well as the BCS, the Council also operates an *Information Asset Register* (*IAR*). The Keeper has been supplied with a screen shot of the *IAR*. An *IAR* is entirely appropriate for an organisation the size and complexity of a Local Authority. The Keeper commends the creation of this document as an inclusive tool which will help staff to recognise record series and the relevant 'owner' who makes decisions as to their management.

The use of the *IAR* is explained in the current *RMP* (for example section 4.7 (page 10):
"To provide better oversight of the Council's information assets and responsibility for those, an Information Asset Register has been developed to record all the Council's information assets. The Register provides relevant information on each asset such as:
• Its primary and secondary locations
• The information asset owner and service/team responsibility
• Whether it contains personal data (including special categories data)
• Details on any data protection impact assessments carried out (DPIA)
• Whether it is a key asset

• Access arrangements and whether any information is shared with third parties
• The BCS schedule which applies to the records held in the asset and the retention period."

Use of both a *Business Classification Scheme* (*BCS*) and an *Information Asset Register (IAR)*:

The Council notes that the roll out of the *Business Classification Scheme* will improve records management. The Keeper agrees that it should assist in directing staff <u>where</u> to save public records (*RMP* section 11.4 page 26). **However, this will not necessary alleviate the problems around multiple copies, version control and naming convention (see element 11). The Keeper also notes that the statement in the *RMP* refers only to records held digitally. An overarching scheme should include public records in all formats.** The Council has confirmed that it is their intention that The file plan, when fully developed, will include paper records.

 Although very detailed and including retention, the *BCS* does not record some details such as 'Location' or 'Format' (the example given is of a 'web-based database). The Act is format neutral and the authorities arrangements must account for all records in any format to satisfy the Keeper. The Council also notes that they plan to utilise the *IAR* more fully in order to "embed a better approach to information management and information risk". A full *IAR*, populated by local business areas and featuring all records in all formats is currently considered best practice. Although not used by all Scottish public authorities, it certainly is a common way of structuring records management in local authorities. In fact, a well-structured *IAR*, if it features retention (as this appears to), and is sufficiently granular, can normally replace the *BCS*. The IAR has been created to give a high level overview of the information assets owned by the Council, which are predominantly systems and datasets. It is not the Council's intention to combine the IAR and BCS at present.

Format of the Council's public records:

As with the majority of Scottish public authorities, Falkirk Council and Falkirk Licensing Board operate multiple record keeping systems simultaneously. Public records are held digitally on shared network drives, on bespoke line-of-business systems and in hard-copy format in-house (both in service areas and in a central Corporate Records Centre). There is no suggestion in the *RMP* that the Council stores records with a third-party commercial storage company. The *RMP* notes, as would be expected, that "as we move to ever-more digital way of working, we fully expect our volume of paper records to decrease" (*RMP* section 11.8 page 27). The Keeper is satisfied that the authority has considered all these structures under their *Business Classification Scheme/Information Asset Register* arrangement.

Digital Shared Drives: The majority of the Council's public records remain on a shared drive system. Staff are supplied with naming convention and version control guidance (see element 11). The use of shared drives continues despite statements in the Council's original submission (2013) that they were investigating options for a more easily controlled system such as an EDRM (for example original *RMP* page 21). In an informal update (2017) the Council stated that "The Council is still at an early stage of investigating the use of SharePoint in the Council, in part as an EDRMS. A pilot SharePoint project is underway within the records management team". This is confirmed in an *Information Governance Work Plan* which has been provided to the Keeper (section RM6). The Keeper has not been updated regarding this pilot, but statements in the new *RMP* appear to show SharePoint/M365 as the planned way forward.

The *RMP* page 3 states that: "The Council is currently planning the development of SharePoint as part of its wider commitment to the rollout Office 365 in 2020. The functionality offered by Office 365 and applications such as SharePoint and Teams

will enable the Council to improve its current approach to the management of digital records currently held in shared drives." The Keeper recognises that Falkirk Council's Records Manager (see element 2) has been consistently engaged in developments in Office 365 through an informal local authority forum. The *RMP* (section 4.4) refers to a pilot 'proof of concept' project to map the BCS to a SharePoint structure. The Council has reported in detail to the Keeper regarding this proof of concept exercise (carried out by Housing Service). They confirm that the work has provided a foundation on which they can plan to build a successful system (subject to securing sufficient resources being available). A working group, chaired by the Records Manager (see element 2), has been established to pursue this.

It would appear that, eight years ago, the Council identified that shared drives were not a satisfactory long-term solution for their business. The Council acknowledges that : "… for a number of years that electronic information, which might form part of records, has not been managed properly on shared drives. The Council's recently-implemented M365 project did not include any element of records management functionality. However, it is recognised that this now needs to be addressed as a follow-up to the original project, and that we now have a foundation in place to enable this."

The work reported here provides very strong support for an improvement plan agreement of this element. A gap in provision has been identified and practical steps have been proposed to close that gap. This is commendable.

Furthermore, the Council has provided the Keeper with a proposed timetable for this project going forward, including a timescale for transferring their public records from the shared drives arrangement to the new solution.

Digital Line of Business: Falkirk Council operate several stand-alone systems for

specific functions (e.g. Human Resources, Social Work, Finance etc.). These line-of-business systems sit outside the main shared drive system, but the Keeper can agree that they are likely to allow the appropriate management of records within a structure as required. See also the Corporate Records Centre below.

Physical in house: Although the majority of the Council's public records are now created digitally, there remains a certain quantity of hard-copy public records. Hard-copy records are recorded in the *Information Asset Register*. The Keeper has been provided with details of the systems in place to ensure that the Council can be confident that these records can be stored, retrieved and destroyed/archived when appropriate (see also elements 6 and 7).

As well as hard-copy records being managed in local business areas, Falkirk Council operate a Corporate Records Centre (CRC) which is overseen by the Records Manager (see element 2). This facility is for business areas to deposit "semi-current and non-current records in paper and certain digital formats" (*RMP* Introduction page 3). The Keeper has been provided with an explanation on how the CRC operates and he agrees that it provides the Council's information governance team a reasonable level of control over the records deposited. The CRC is managed through a bespoke in-house database. The database gives the ability to track the location and movement of any records, regardless of format, including eventual disposition.

The *Records Management and Archival Policy* makes it clear that Falkirk Council are responsible for any public records inherited from its predecessor authorities (such as Central Region) (*Policy* section 1.2).

The Keeper agrees this element of the RMP on 'improvement model' terms while the transition to the new digital records management solution is underway. The Keeper's agreement is conditional on his being updated on

			progress. The Keeper's Assessment Team will provide Falkirk Council with a Progress Update Review (PUR) template each year. This would seem an ideal opportunity for the Council to provide updates against the timetable they have submitted.
5. Retention schedule	**G**	**G**	The Keeper expects an authority to have allocated retention periods to its public records and for those records to be retained and disposed of in accordance with a Retention Schedule. The Council have provided the Keeper with their combined *Business Classifications Scheme and Retention Schedule* (see element 4). A sample entry showing that records of vehicle checks are destroyed 18 months after the date of the check is: *Property and land management/Vehicle Checks/First use checks/Date of check/18 months/Destroy/Business requirement/added by service*. The combined *Business Classification Scheme* and *Retention Schedule* is available to service users publically at: Business Classification & Retention Schedule - All Schedules (falkirk.gov.uk). This is commended. The Keeper can accept that retention decisions have been determined for all the record types created while the Council carries out the activities needed to pursue its functions. Furthermore, it is clear that local services are involved with the allocation of retention decisions for the records in their particular business areas (the example above: "*Destroy/Business requirement/added by service*"). This local involvement is important in a large complex authority such as the Council (see under General Comments below). Destruction guidance is available to staff (see element 6). **However, see element 4 for potential problems implementing these decisions on public records held on shared drives.**

			Digital Line of Business: The Keeper can agree that records held on the various business systems (such as Human Resources) have specified retention decisions allocated and that these are understood. **Changing the Retention Schedule:** Services must complete an update form and submit it to the Records Manager (see element 2) if they require changes to be made to a retention schedule. Any changes are notified to staff through Yammer (see element 12) and reported to the Information Management Working Group (see Key Group under General Comment below). There is a recognition in the *RMP* that the *Business Classification Scheme/Retention Schedule* is a 'living document' and will be subject to continual minor change year on year (for example *RMP* sections 4.6 and 5.5). The Keeper agrees that Falkirk Council and Falkirk Licensing Board has a schedule providing retention decisions for the record types created while pursuing its functions.
6. Destruction Arrangements	**A**	**G**	The Act requires that public records are destroyed in a timely, controlled and secure manner. Falkirk Council and Falkirk Licensing Board acknowledge this: The Chief Executive of Falkirk Council provides an introductory statement to the *Records Management and Archival Policy* in which he notes that "Effective records management ensures that all information is destroyed or preserved in accordance with the Council's Business Classification and Retention Schedule." (*Policy* page 3). With this commitment in mind the Council has *Guidance on Destruction of Records* which has been provided to the Keeper. The *Guidance on Destruction of Records* is

available on the staff intranet. The Guidance on Destruction of Records document directs staff to the *Business Classification Scheme/Retention Schedule* (see element 4) with an explanation of how to use retention works.

The Council have the following process in place, to ensure the controlled, secure and irretrievable destruction of public records (For the structure of the Council's records management systems see element 4 above).

Digital Shared Drives: In their original plan, agreed by the Keeper under 'improvement model' terms, the Council had identified this was an area where more work needed to be done around the controlled destruction of records in line with the retention schedules. In 2013 the Council stated "Overall the Council needs to improve on the deletion of electronic records in accordance with the Retention & Disposal Schedule together with ensuring appropriate destruction forms are being completed. With the introduction of a new email system and the implementation of the Business Classification Scheme it is anticipated that the deletion of electronic records will become more manageable and will therefore be in accordance with the Retention & Disposal Schedule." (2013 *RMP* section 6.11). Although work has progressed on both the Business Classification Scheme and on e-mail protocols (explained in *RMP* section 6.11) , it seems the Council is not yet confident in this area. In the current *RMP* they state "The destruction of digital records within Services-specific systems and in shared drives remains an area in which improvement is required...The next step in relation to information held in shared drives is the rollout of 365 and the development SharePoint [sic]. It is anticipated that SharePoint will provide a centralised location where records can be stored and managed, with built-in rules around retention and destruction of records based on the BCS" (2020 *RMP* section 6.8). **The Keeper agrees that the proposed move to M365, discussed under element 4, should, if set up appropriately, greatly improve the centralised control over destruction. However, as at June 2021, the full disposition functionality of M365 is still not quite clear to the Keeper**

nor is the licensing arrangements required to allow automatic approval in series as described for the Council's records below. The Council has confirmed that they are aware of possible limitations in this area and are investigating in conjunction with other Scottish local authorities.

Until the Council is confident and can evidence that all public records in all formats can be deleted in a controlled manner this element remains at amber.

Digital Line of Business: These line-of-business systems sit outside the main record keeping systems, but the Keeper can agree that they are likely to allow the destruction of public records within a retention framework as required.

Physical in house: Public records held in hard-copy format are either destroyed in the CRC (see below) or in local service areas by shredding (instructions are provided to staff and have been shared with the Keeper) or by a commercial paper destruction company under contract (sample of destruction certificate provided in evidence). Staff have been provided with guidance on the destruction of paper records (a separate guidance document from the general *Guidance on Destruction of Records*). This guidance has also been shared with the Keeper.

Destruction authorisation: When prompted by retention decisions, records are authorised for destruction by signature of the relevant information asset holder (opportunity for local areas to override destruction for business purposes) and possibly by the Council archivist (to indicate that they are satisfied nothing of archival value is being destroyed). In the case of public records held in the Corporate Records Centre (see element 4 above), the destruction form is initially signed by the Records Manager or the Corporate Records Administrator. This means for certain categories of records three authorisations, in series, may be required before destruction.

Destruction forms are retained by the central RM Team. This is commended.

Samples of records destruction forms have been provided as evidence that the arrangement described above is operational. It is clear from the *RMP* that this procedure is designed to be common to both digital and hard-copy records.

Hardware: Falkirk Council contracts out the secure recycling and disposal of its hardware. The contractors policy details how they re-use, re-sell, refurbish items and only those items that do not fall into these categories will be treated as landfill waste. Secure destruction of hard drives and formatting of data is carried out to ISO9001 and ISO1401 quality standards.

Back-Ups: Falkirk Council, quite rightly keep back-ups of public records for business continuity purposes (see element 10). The *RMP* (section 8.18) explains that records stored on shared drives or within database systems are backed up nightly. Backups are stored for an agreed period of time **(In time, the Keeper will need to know who is involved in this agreement)** before being destroyed. Schedules for backup and destruction of records are created within the backup software which then manages the backup and deletion of records. The plan is for information stored in M365 to be controlled by M365 backup software policies. This all seems appropriate. The Council also refers to back up tapes being held in a secure fire-proof safe in its *RMP* (*RMP* section 8.19).

The Council have provided the Keeper with detailed information regarding backup periods and confirmed that the information governance group have been made aware of these. Furthermore, the backup periods for M365 have been discussed as part of the wider information governance discussions by the Information Management Working Group.

The managed destruction of records is supported by the Council's *Information*

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Security Policy (see element 8) for example section 5.6.

The Keeper agrees this element of the Council's *RMP* as an area for improvement. He acknowledges that the authority has identified a gap in provision and is satisfied that they have identified processes that will close that gap. His agreement is conditional on his being updated on progress, perhaps through a Progress Update Review (see element 4 above).

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<td>7. Archiving and Transfer</td>
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The Act requires that all Scottish public authorities identify a suitable repository for the permanent preservation of any records considered suitable for archiving. A formal arrangement for transfer to that repository must be in place.

Falkirk Council have identified Falkirk Archives as the proper repository for the small selection of their public records suitable for permanent preservation. Falkirk Archives is operated by Falkirk Community Trust, which is a charitable company set up to carry out cultural and leisure services for the Council.
[Falkirk Community Trust Home Page](#)

The Council transfers public records to the archive under the terms of a *Collaborative and Partnership Working Agreement* which has been shared with the Keeper. This explains that ""The Archives Section of the Trust and the Corporate Records Team shall maintain their working relationship in accordance with the terms of the Service Level Agreement" This *Service Level Agreement* has also been received by the Keeper. Furthermore, the Council have provided the Keeper with the archive's *Collections Agreement* which is a legal agreement between the Council and the Trust detailing the operational requirements of the Council. It also defines the role and responsibilities of the Archivist in relation to the collections. The Keeper is satisfied that information asset owners in the Council have adequate input to how preservation decisions are allocated to particular record types through these agreements.

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The Council has also provided the Keeper with the archive's *Appraisal and Selection Statement of Practice* to show the record types routinely transferred from the Council.

The Keeper notes that the *RMP* makes the engagement between Council and archive clear (section 7.6): "When records held by the Corporate Records Centre reach the end of their retention period they are listed on destruction forms. For those records that have archival or historical value (as stated in the *BCS*), approval is sought from both the responsible Service and the Archivist for destruction. This process enables the Archivist to identify individual records which may have archival value and to identify any file series which require an appraisal review. Archive selection is in accordance with the retention schedule and is format neutral." This close engagement is to be commended.

As evidence of the practical transfer process, the Council have provided the Keeper with other operational documentation around the archive function such as a sample *Archives Entry Form*.

The Keeper agrees that Falkirk Council adheres to the Keeper's *Supplementary Guidance on Proper Arrangements for Archiving Public Records*: https://www.nrscotland.gov.uk/files//record-keeping/public-records-act/supplementary-guidance-on-proper-arrangements-for-archiving-public-records.pdf

Archiving Born Digital Records: Digital records are copied into an Archives Document Retrieval Area. These are then available for the Archivist for accession. The original record is only deleted once the transfer is complete and the Archivist has confirmed receipt and checked that the records were not corrupted in transit.

			The Archivist is currently working on a Digital Preservation Strategy which will be reviewed by the Information Management Working Group (see under General Comments below) and trailing a third-party digital preservation solution. **The Keeper would be particularly interested in receiving updates on this important work when appropriate.** The Keeper agrees that Falkirk Council and Falkirk Licensing Board have arrangements in place to properly archive records when appropriate.
8. Information Security	**G**	**G**	The Act requires that public records are held in accordance with information security compliance requirements. The Council has an *Information Security Policy* which has been submitted to the Keeper. This is v1.0 dated April 2019. The Council's, *Falkirk Council Financial Regulations* which have been shared with the Keeper, state: "All Officers of Falkirk Council, Elected Members, and Officers and agents of external organisations who in any way access or have responsibility for any Council information system, or have access to Council owned data, must adhere to the Council's Information Security Policy issued by the Director of Corporate and Housing Services. All new staff should be made aware of the Information Security Policy through the induction process." The description of information security measures in the *RMP* includes processes to protect hard-copy public records (for example *RMP* section 8.10). Staff have access to an *Security Incident Reporting Procedure* document through the intranet. Reporting is also a feature of the *Information Security Policy* (section 7). The Information Management Working Group (see under General Comments

			below) receive regular reports on information security risks/incidents/breaches from the Information Governance Manager (organisational) and the Technology and Infrastructure Manager (technical) and review these to ensure that action is taken to reduce both the occurrence and impact of such incidents in the future (*Information Management Working Group Remit*). The Council has a mobile working policy which properly recognises the inherent security risks involved in this type of working. It is published at [Policies - Mobile Flexible Working guidance | Falkirk Council](#) All Council staff undertake mandatory training in information security which is also part of the induction of new staff. Staff processing personal information also have compulsory data protection training. The Keeper agrees that Falkirk Council and Falkirk Licensing Board have procedures in place to appropriately ensure the security of their records as required by the Act.
9. Data Protection	**G**	**G**	The Keeper expects a Scottish public authority to manage records involving personal data in compliance with data protection law. Falkirk Council is registered as a data controller with the Information Commissioner's Office (ICO): Z7343688 Falkirk Council Licensing Board is registered as: ZA752398 The Council have a *Data Protection Policy*. The Keeper has been provided with a copy of this *Policy*. This is version 3.0 dated January 2021. This is published at: [https://www.falkirk.gov.uk/services/council-democracy/access-to-information/docs/data-](#)

protection/guidance/Data%20Protection%20Policy.pdf?v=201906271131

The *Data Protection Policy* confirms that "We are committed to protecting personal data and complying with data protection legislation as defined by the Data Protection Act 2018 (the Act) and the 6 data protection principles." (Page 2)

The *Data Protection Policy* goes on to explain these 6 principles (page 3).

Service users can make a subject access request using an online template: Contact us - make a data subject request - My Falkirk

The Council have other relevant data protection information published on their website for example from: Privacy | Falkirk Council

The Council is committed carrying out data protection impact assessments (DPIA) when necessary and, once completed, these are reviewed by the Information Management Working Group (see under General Comments below). A *DPIA Screening Checklist*, which has been provided to the Keeper, is also available to help staff assess whether a DPIA is required (processing of personal data likely to result in a risk to individuals for example). This is version 2.0 dated 17 December 2018.

Furthermore, they have other supporting guidance for staff, such as *Data Protection and Confidentiality Guidelines* for staff. This has also been shared with the Keeper. This is excellent guidance with very good examples to help staff understand the restrictions placed on data collection by legislations. For example "Personal data should not be collected simply because it has always been collected, or because it might be useful in the future. You should ask yourself why you are collecting personal data and whether you really need it. For example, do you really need someone's gender or date of birth if they are reporting a street light fault" (*DP

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Guidance section 3).

The *Records Management Policy* (see element 3) specifically indicates support for the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (*Policy* section 2.4).

The Council's Information Governance Manager is also Data Protection Officer. The Records Manager (see element 2) reports directly to the Information Governance Manager.

Staff processing personal information also have compulsory data protection training and training statistics are reported to the Corporate Management Team (*Data Protection and Confidentiality Guidelines*). Pursuing appropriate data protection training is an objective of the *Information Governance Work Plan* (June 2018 version) which has been supplied to the Keeper.

The Keeper agrees that Falkirk Council and Falkirk Licensing Board have arrangements in place that allow them to properly comply with data protection legislation.
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<td>10. Business Continuity and Vital Records</td>
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The Keeper expects that record recovery, prioritising vital records, is an integral part of the authority's business continuity planning.

The *Records Management and Archival Policy* (see element 3) explains that "Records management defines vital records (which are included in business continuity plans)" (*Policy* section 1.4).

The *Information Security Policy* (see element 8) states that "Business continuity plans must be prepared and tested where appropriate" (*IS Policy* section 5.5)
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			With this in mind, each business area in the Council has a *Business Continuity Plan* based on a template which includes records recovery prioritising vital records the Keeper has been provided with a copy of this template, and guidance to its completion. The *RMP* (for example section 10.3) explains the identification of vital records 'key assets'. The Corporate Records Centre have a *Disaster and Prevention Recovery Plan* which has been shared with the Keeper. Archives and Records staff have undertaken disaster recovery training (see element 12). The Community Trust has invested in digital storage drives, which should allow digital preservation. These will back-up each other to ensure business continuity (*RMP* section 7.10). Business Continuity Plans are reviewed annually and after a substantial event occurs. The Records Manager (see element 2) takes part in this review. The involvement of the Council's Records Manager is important to ensure that the recovery of public records is emphasised. The Keeper agrees that Falkirk Council and Falkirk Licensing Board have approved and operational business continuity processes and that information management and records recovery properly feature in the authority's plans.
11. Audit trail	**A**	**G**	The Keeper expects an authority to have processes in place to track public records in such a way that their location is known and changes recorded. The *Records Management and Archival Policy* (see element 3) includes a statement from the Council's Chief Executive (see element 1) in which he states: "Effective

records management ensures that all information: received or created is stored appropriately and is easily retrievable" and "is accessible to users and that the appropriate technical, organisational and human resource elements exist to make this possible" (*Policy* page 3). This statement is repeated in the *RMP* itself (section 3.3) and supported by other sections of the *Policy*, such as 1.4 "Records management allows the information and records to be easily accessed and retrieved".

Mr Lawrie's statement is dated June 2020 and is published on the Council website: Records Management and Preservation of Archival Records Policy (falkirk.gov.uk)

However, despite this high level recognition, the *RMP* states clearly "It is recognised that the Council does not currently have adequate procedures in place in relation to audit trails covering all transactions undertaken" and "Currently, most digital records held within the Council are not held in a structured format and have neither an audit trail nor a limit on the copies or versions of the same document. Within directory structures on servers there is also no capability of doing so. The proof of concept that we are currently undertaking should demonstrate that Office 365 can provide effective audit trail functionality" (*RMP* section 11.1 and 11.2, page 26). The Keeper agrees that the adoption of M365 will greatly help with this situation as it should automatically apply version control. Staff will still be required to name records correctly in order that the M365 search facility (which is quite powerful) can be properly utilized. The Council have provided the Keeper with a copy of their *File Naming Guidance* document which will help with this.

The Keeper has also been provided with minutes of meetings of the Information Management Working Group, showing that they recognise the work required in this area, and with a timetable for that work to be progressed.

The Keeper can therefore be confident that the Council is working towards improvement that will ensure compliance with the Keeper's expectations under the Act (and with their own Chief Executive's records management statement, as published).

In their 2013 submission the Council stated that they did not have version control procedures in place and committed to developing these. These are now in place and the Keeper has been provided with a copy of the Council's *Version Control Policy*. This is version 1.0 dated December 2019. The Council have also provided their *Naming Convention Guidance* (both version control and naming conventions are vital for managing records on a shared drive arrangement). The *RMP* states that these documents are available to all staff on the intranet. The Keeper has been provided with screen-shots as evidence of this arrangement.

Digital Line-of-Business: Falkirk Council operate line-of-business systems such as for the management of records relating to their planning function. The Keeper can accept these systems have record tracking functionality.

Physical in house: The Council has provided the Keeper with a good explanation of how they track and identify public records held in hard copy format both in the individual business areas and in the central CRC (see element 4). An example of the paper file system has been provided.

The Keeper notes that, ideally, paper records should also be accounted for in the *IAR/BCS* even if they are managed under a different system. Also the systems described in section 11.5, such as the tracking cards, file registers and bespoke databases are also public records and must, themselves, be managed.

The Keeper agrees this element of the RMP on 'improvement model' terms while the transition to the new records management solution is underway.

			However, his agreement is conditional on his being provided with updates as the project progresses.
12. Competency Framework for records management staff	**G**	**G**	The Keeper expects staff creating, or otherwise processing records, to be appropriately trained and supported. The Council is committed to the learning and development of staff and the 'Achievement and Personal Development Scheme' and 'Good Conversations' scheme provides an opportunity for any training requirements to be addressed. There is good evidence in the *RMP* that records management training is available as appropriate. For example resource has been allocated to formal training for the Records Manager (see element 2). A competency framework is in place detailing the required skills for Records Management and Archives Staff including the Records Manager and the Corporate Records Assistants. This framework has been provided to the Keeper. This is based on that developed by the Archives and Records association which has been endorsed by the Keeper. Samples have been provided. All Council staff undertake mandatory training in information security which is also part of the induction of new staff. Staff processing personal information also have compulsory data protection training. Information Security training is supported in the Council's *Information Security Policy* (see element 8) at section 5.7 and the *Policy on Acceptable Use of ICT* (section 9). Training is updated annually and training statistics are reported annually to senior management. Data protection training is supported by the Council's *Data Protection Policy* (see element 9) core commitment 2: "We will ensure that all staff who handle personal data understand their responsibilities under data protection legislation and receive

appropriate training annually". The staff *Data Protection and Confidentiality Guidelines* contain a section on training.

As well as the mandatory security training a records management module is available to all members of staff (*RMP* section 12.9) The Keeper has been provided with a screen-shot showing staff access to learn modules in evidence.

The People, Technology and Transformation Division of the Council's Corporate & Housing Services is responsible for providing specialist / technical advice for all aspects of managing electronic records to fulfil the requirements of the *RMP* (*Policy* section 5.15 page 7). Training is also provided for staff whose role requires them to engage with social media (*Policy on Acceptable Use of ICT* page 5).

Archives and Records staff have previously undertaken Disaster Recovery Training (see element 10). The Council has requested details of future training dates and has committed to refresher training.

The Council Intranet "Inside Falkirk" provides dedicated areas whereby staff can access information, policies, procedures and forms on data protection, records management and information security. There is also an in-house discussion forum "Information Matters" which provides a space where representatives from across the Council can share issues, discuss best practice and work together on information and records related projects. It is also used to update staff on information governance changes (for example *Policy* section 6.3 and *RMP* section 5.4). There is also a staff newsletter which carries information governance articles.

It is a requirement in the *Information Governance Work Plan* (June 2018 version), which has been supplied to the Keeper, that the Records Manager (see element 2) is responsible for ensuring that relevant staff training is reviewed and is kept up-to-date.

			The Keeper agrees that the individual identified at element 2 has the appropriate responsibilities, resources and skills to implement the records management plan and that Falkirk Council and Falkirk Licensing Board consider information governance training for staff as required.
13. Assessment and Review	**G**	**G**	Section 1(5)(i)(a) of the Act says that an authority must keep its RMP under review. The Chief Executive of Falkirk Council provides an introductory statement to the *Records Management and Archival Policy* (see element 3) in which he commits that "The Plan will be regularly assessed and reviewed to ensure its effectiveness in terms of records management throughout the Council." (*Policy* page 3). The Information Management Working Group (see under General Comments below) is responsible for oversight of the continued assessment and review of the *RMP*. The assessment will be carried out by the Records Manager (see element 2) annually. The Council have provided the Keeper with the following methodology statement: "In the past the Council has issued Self-Assessment Questionnaires to services to complete. However we do not consider that this alone is robust enough to ensure that services are fully complying with the elements within the plan. Therefore the Records Manager intends to follow this up by utilising the Scottish Council on Archives ARMS Framework, in particular interviews with key staff/management and observations of practices. Our Information Asset Register will also be used to help inform current practices. Findings and recommendations will be presented to the Information Management Working Group." The Keeper thoroughly supports this action and has previously endorsed the ARMS

Framework.

Additional to the Records Manager's annual review of progress against the *RMP*, Falkirk Council have opened up a dialogue to establish a peer review arrangement with another local authority's records management team. This is an excellent idea and the Keeper highly commends it. He considers that this could be used as an example of best practice for the public sector generally. **He would be very interested to know if an agreement has been concluded and in feedback on this project once it is at an appropriate point.**

Finally the Council has undertaken a "service design exercise focusing on our records management processes led by a service designer within the PTT [People, Technology and Transformation] Team." (*RMP* section 13.6) This is welcome as it seems to be creating a clear link between robust records management and efficient business processes.

As well as overseeing the review of the *RMP*, IMWG is also responsible for the review of some of the key evidential documents, for example they reviewed the *Records Management and Archival Policy* in March 2020.

Falkirk Council undertakes two IT security external audits on an annual basis (*RMP* section 8.9)

Business Continuity Plans (see element 10) are reviewed annually. The Resilience Planning team also carry out annual business continuity exercises. The Council's contract with a third party document restoration service allows for external review of recovery systems. The Council has committed to request this is undertaken (*RMP* section 10.7)

Information security and data protection training is updated annually and training

statistics are reported annually to senior management. It is a requirement in the *Information Governance Work Plan* (June 2018 version), which has been supplied to the Keeper, that the Records Manager (see element 2) is responsible for ensuring that "procedures, guidance and relevant staff training (if relevant) are reviewed annually (or more frequently if required) and up-to-date."

The *RMP* makes it clear that the *Retention Schedule* (see element 5) will be periodically reviewed (*RMP* section 5.2). This is a recognition that a retention schedule is a living document subject to updates as appropriate to the Council's business needs.

The RMP makes it clear that archiving arrangements with the Trust (see element 7) are reviewed annually and a report is produced "if there are any significant changes in the capacity of either the Council or the Trust to fulfil its obligations" (*RMP* section 7.4). The formal agreement between the Council and the Archive which supports the archiving arrangements, is itself reviewed every three years.

The *RMP* (section 10.5) states that "The Council has also carried out an assessment on high risk systems to capture to what extent they comply with record management principles and this will allow us to identify areas of weakness and make improvements where we can. This will also assist services when procuring upgrades to their systems as they will know in which areas improvement is required." The Information Management Working Group approved the content of a form to collect information in relation to these systems to record the current state of compliance. The key systems were identified as those containing particularly sensitive personal data. The content of the forms was signed off by the Information Asset Owner. Although these simply capture non-compliance issues at a certain point in time, they have helped identify issues that need to be addressed next time a system is due for upgrade/replacement. At the time of submission the Council was undertaking a series of workshops as part of a project to consider a corporate digital

			records management solution. **The Keeper would be interested in any update on that situation (see element 4 above).**
			The *RMP* mentions the intention to undertake the Keeper's Progress Update Review (PUR) process going forward. As a matter of fact the Council has already submitted a PUR to the Keeper (2017). This is strong evidence that the authority understands its responsibilities to keep their plan under review. PUR is, of course, just a reporting mechanism and does not dictate review methodology. The Council indicates that it will use PUR as part of its internal reporting structure (*RMP* section 13.5).
			The Keeper agrees that Falkirk Council and Falkirk Licensing Board have made a firm commitment to review their *RMP* as required by the Act.
14. Shared Information	**G**	**G**	The Keeper expects a Scottish public authority to ensure that information sharing, both within the Authority and with other bodies or individuals, is necessary, lawful and controlled.
			Falkirk Council shares information with third parties as part of the activities they undertake to fulfil their functions. For example a local authority will share financial information with central government or personal information with Police Scotland. They do so using established protocols and procedures that properly consider information governance at the outset.
			The *Information Security Policy* (see element 8) specifically refers to the risk involved in information sharing among partners (for example *IS Policy* section 5.3).
			This is particularly important when sharing personal information between parties and the *RMP* makes clear that information sharing in the Council is supported by the data protection policies and procedures (see element 9). The Council's *Data*

			Protection and Confidentiality Guidelines features a section on information sharing
			As an example of the information sharing procedures undertaken the Council points to the Scottish Information Sharing Toolkit used to share information with NHS Forth Valley: https://www.informationgovernance.scot.nhs.uk/is-toolkit/ This is a good example that the Keeper is familiar with.
			Council staff are provided with guidance around information sharing on the corporate intranet. The Keeper has been provided with a copy of the *Guidance on Secure Transfer of Information*.
			The *Information Governance Work Plan* (section DP2) has a 2019 target to "Capture information sharing arrangements across the Council and ensure that, information sharing protocols are in place, and a central register is set up and maintained." The Council has now confirmed that The Information Governance Manager keeps a central record of ISPs. A sample has been submitted in evidence.
			The Keeper can agree that Falkirk Council and Falkirk Licensing Board properly considers records governance when undertaking information sharing programmes.
15. Public records created or held by third parties	**G**	**G**	The Keeper expects a public authority to ensure that adequate arrangements are in place for the management of records created and held by third parties who carry out any functions of the authority.
			This is acknowledged by Falkirk Council and Licensing Board and, in fact, the relevant clause in the Act (Part 1, section 3.1) is directly quoted in the introduction to the *Records Management Plan* (page 3).
			The Council contracts out some of its functions to third parties, such as charities or

ALEOs (such as Falkirk Community Trust – see element 7).

Contractual clauses are used by the Council to assure themselves of suitable records management provision in the contracting organisation. The clauses used are those developed by the Society of Local Authority Lawyers and Administrators in Scotland (SOLAR) and endorsed by the Keeper: RM-Draft-Clauses-ARMS-2018.pdf (scottisharchives.org.uk)

The Keeper has been provided with a copy of the Council's *Standing Orders* in this area in evidence. Furthermore he has been provided with a copy of the agreement between the Council and the Community Trust which shows an example of these third-party arrangements in operation.

The *RMP* (section 4.5) notes that records created by third parties, when carrying out the functions of the Council, are recorded in the Council's own *BCS* (see element 4). This is a highly recommended step as it should allow the Council oversight regarding what record types the third party is creating. In turn this would be extremely useful if records had to be returned to the Council in the future. Furthermore, the Council has committed that "If a third party would like to use the BCS, then the appropriate function, activities and transactions folders for that specific function can be provided to the contractor to assist with their records management." The Keeper commends this principle.

The Keeper agrees that Falkirk Council and Falkirk Licensing Board have appropriately addressed their responsibilities under PRSA clause 3.1b and have put processes in place that allow them to have confidence that adequate arrangements are in place for the management of records created and held by third parties who carry out any functions of the authority as required by the Act.

Falkirk Council and Falkirk Licensing Board
(for simplicity the two separate authorities will be referred to as 'the Council' in the assessment below)

General Notes on submission:

Version: This assessment is on the Falkirk Council and Falkirk Licensing Board Records Management Plan (the *RMP*) submitted to the Keeper for his agreement on 31st July 2020. This is version 4.0 of the *RMP*, finalised on the same day. The *RMP* was prepared by the Records Manager (see element 2) and approved by the Information Governance Manager. The Keeper originally agreed the *Records Management Plan* of Falkirk Council and Licensing Board in 2013: https://www.nrscotland.gov.uk/files/record-keeping/public-records-act/20130814FalkirkCouncil.pdf

It should be noted that at the time of the Keeper's 2013 agreement the *RMP* included three authorities: Falkirk Council, Falkirk Licensing Board and the Central Scotland Valuation Joint Board. The current *RMP* does not include the Valuation Joint Board as they now manage their records under a separate *RMP* (agreed June 2018): Central Scotland Valuation Joint Board - 28 June 2018 (nrscotland.gov.uk)

Falkirk Council and Licensing Board submitted a Progress Update Review (PUR) in 2017: Falkirk Council and Falkirk Licensing Board (nrscotland.gov.uk)

The *RMP* is supported by *Covering Letters* from the Chief Executive of the Council (dated 6th June 2020) and from the Clerk to the Licensing Board (9th July 2020) in which they endorse the *RMP*, identify themselves as the responsible individuals under element 1, and identify the Records Manager as having day-to-day responsibility for implementing the *RMP* under element 2.

The Chief Executive of Falkirk Council has publically stated that "Records management is fundamental to the Council's efficiency and we believe that effective records management will bring substantial benefits to the Council. This can be achieved through greater business efficiency and improvements in the use of financial, human and other resources." (*Records Management and Archival Policy* – see element 3). The Keeper agrees this statement.

The *RMP*, section 12.13, states that: "Senior management are committed to maintaining effective records management and will ensure ongoing adequate resources are available to fulfil the requirements under the PRSA."(see element 12 for evidence of this)

The authority refers to records as a business asset: "Records are one of the Council's vital assets" (*RMP* Introduction page 3). This is an important recognition and the Keeper commends it.

The introduction to the *RMP* also explains that "effective records management arrangements will...help to
• increase efficiency and effectiveness, delivering savings in administration costs;
• improve and develop service delivery;
• achieve business objectives and targets;
• ensure compliance with the Public Records (Scotland) Act 2011;
• support transparency and open government; and
• underpin business resilience."
The Keeper fully concurs with this statement.

The Keeper also agrees that the efficiencies introduced by robust records management provision will assist Falkirk Council to attain the objectives explained in the *Corporate Plan*:
Policies & strategies - Corporate Plan 2020 - 2022 | Falkirk Council

The *RMP* mentions the Act and is based on the Keeper's, 15 element, Model Plan http://www.nrscotland.gov.uk/record-keeping/public-records-scotland-act-2011/resources/model-records-management-plan.

The previous version of the *RMP* is available on the Council website at: Microsoft Word - BPAI0001 - Falkirk Council's Records Management Plan - V2.04.doc. The Keeper would expect that, once agreed, version 4.0 will replace this.

Key Group: Information Management Working Group (IMWG)

The Information Management Working Group (IMWG) is responsible for the continued assessment and review of the *Records Management Plan* (*RMP*), as required under the Act, and for ensuring that a corporate approach to information management is adopted throughout the Council. (*RMP* section 3.2 page 8).

The Keeper has been provided with a copy of the *IMWG Remit*. This shows that the Group is responsible for promoting the effective management of all Council information and ensuring an Information Management strategy is in place and overseen. Specifically the working group must "Ensure necessary plans and policies relevant to information management are in place and regularly reviewed (such as the Records Management Plan, the Information Security Policy and the Data Protection Policy)." (*IMWG Remit* objective 4)

The IMWG is chaired by the Chief Governance Officer, meets quarterly, and reports to the Corporate Risk Management Working Group. The Information Governance Manager and the Records Manager (see element 2) have a committed action to attend the IMWG on an ongoing basis (*Information Governance Work Plan*).

The IMWG monitors separate business areas for compliance with information governance procedures.

The IMWG reviewed and approved the *Records Management and Archival Policy* (see element 3), *Business Classification Scheme* and *Retention Schedules* (see elements 4 and 5), *Guidance on Secure Transfer of Information* (see element 14) and *Information Security Policy* (see element 8). Going forward, they will be fully involved in the proposed digital preservation strategy (see element 7).

The IMWG also review Data Protection Impact Assessments (DPIAs) as they are created (see element 9).

In conjunction with the IT Security Group the IMWG is responsible for the promotion of Information Security throughout the Council (*Information Security Policy* section 6.4)

The IMWG is clearly of fundamental importance to the information governance structure in the authority and the Keeper thanks Falkirk Council for providing details of their work in the submission.

<u>Local Records Management, Records Management Champions</u>:

Each of Falkirk Council's business areas are required to appoint a local records management representative who will liaise between their service area and the Corporate Records Team. The Records Manager (see element 2) will work with services to ensure that the *Business Classification Scheme/Retention Schedule* (see element 4) is reviewed and updated where necessary.

An in-house discussion forum "Information Matters" provides a space where representatives from across the Council can share issues, discuss best practice and work together on information and records related projects. (*Policy* section 6.3 page 7).

Owners of information must carry out regular reviews of user access rights and in particular must withdraw rights promptly when staff leave or change roles (*Information Security Policy* section 5.4).

<u>Corporate Records Team</u>:

Falkirk Council have created a Corporate Records Team who have responsibility for records management in the authority. All business areas must refer to this team for records management provision and guidance. Record destruction forms are sent to the Corporate Records Team for scanning and retention (see element 6).

The Corporate Records Team oversee the Corporate Records Centre (CRC).

The Corporate Records Team are responsible for updating retention schedules.

6. Keeper's Summary

Elements *1 - 15* that the Keeper considers should be in a public authority records management plan have been properly considered by Falkirk Council and Falkirk Licensing Board. Policies and governance structures are in place to implement the actions required by the plan.

Elements that require development by Falkirk Council and Falkirk Licensing Board are as follows:
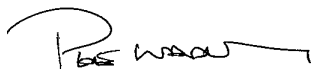
4. Business Classification
6. Destruction Arrangements
11. Audit trail

7. Keeper's Determination

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

- The Keeper recommends that Falkirk Council and Falkirk Licensing 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,

…………………………………   …………………………………

Pete Wadley   **Liz Course**
Public Records Officer   Public Records Officer

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

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

……………………………………………

Paul Lowe
Keeper of the Records of Scotland