

Public Records (Scotland) Act 2011

Orkney and Shetland Valuation Joint Board

The Keeper of the Records of Scotland

31st July 2017

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1. Public Records (Scotland) Act 2011

The Public Records (Scotland) Act 2011 (the Act) received Royal assent on 20 April 2011. It is the first new public records legislation in Scotland since 1937 and came 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 the Orkney and Shetland Valuation Joint Board by the Public Records (Scotland) Act 2011 Assessment Team following its submission to the Keeper on 31st January 2017.

The assessment considered whether the RMP of the Orkney and Shetland Valuation Joint Board was developed with proper regard to the 14 elements of the Keeper's statutory Model Records Management Plan (the Model Plan) under section 8(3) of the Act, and whether in this respect it complies with it and the specific requirements of the Act.

The outcome of the assessment and the Keeper's decision on whether the RMP of the Orkney and Shetland Valuation Joint Board complies with the Act can be found under section 7 of this report with relevant recommendations.

3. Authority Background

The Orkney and Shetland Valuation Joint Board was established in 1996, under The Valuation Joint Boards (Scotland) Order 1995, and its primary purpose is to discharge all the functions of its two constituent authorities, Orkney Islands Council and Shetland Islands Council, as valuation authorities under the Valuation Acts.

The Board is a separate public body from the two constituent authorities but draws its membership from them, each nominating 5 councillors to serve on the Board. The Board is responsible for appointing the Assessor for Orkney and Shetland, an independent statutory official responsible for the preparation and maintenance of the Valuation Roll and the Council Tax Valuation List. The Assessor has also been appointed as Electoral Registration Officer for both Orkney and Shetland and is, therefore, also responsible for the preparation and maintenance of the Register of Electors.

<http://www.orkney-shetland-vjb.co.uk/>

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

Key:

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.
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5. Model Plan Elements: Checklist

Element	Present	Evidence	Notes
1. Senior Officer <i>Compulsory element</i>	G	G	<p>Orkney and Shetland Valuation Joint Board (the Board) have identified Dennis M Stevenson, Assessor & Electoral Registration Officer, as the individual with overall responsibility for records management in the authority.</p> <p>The Assessor's role is confirmed by the <i>Records Management Policy</i> (see element 3) section 6.2.</p> <p>Mr Stevenson is the author of the <i>Records Management Plan</i> (the <i>Plan</i>), the <i>Records Management Policy</i> (see element 3), the Data Privacy Notice, <i>Data Protection Policy and Data Retention Policy</i> (see element 9), the <i>Information Security Policy</i>, the <i>Data Security Policy</i>, the <i>Security Incident and Weakness Policy</i>, the <i>Acceptable Use Policy</i>, the <i>Physical and Environmental Security Policy</i>, the <i>Access Control Policy</i>, the <i>Backup and Restore Policy</i>, the <i>Data Access and Building Security Policy</i> and the <i>Security of IT Systems</i> staff guidance document (for all see element 8), the <i>Business Continuity Plans</i> (see element 10), the <i>Disposal of Media and Secure Disposal and Re-use of Equipment</i> procedural documents (see element 6).</p> <p>The above would suggest that Mr Stevenson has a detailed knowledge of information governance provision in the authority.</p> <p>It is the responsibility of the Assessor and the Assistant Assessor (see element 2) to ensure all staff are familiar with good practice rules concerning information</p>

			<p>security (<i>Data Security Policy</i> published at http://www.orkney-shetland-vjb.co.uk/DATA%20SECURITY%20POLICY.pdf). He is also responsible for the physical security of record and servers (<i>Physical and Environmental Security Policy</i> page 2).</p> <p>The Keeper agrees that Orkney and Shetland Valuation Joint Board have identified an appropriate individual to this role as required by the Public Records (Scotland) Act 2011 (the Act).</p>
<p>2. Records Manager <i>Compulsory element</i></p>	<p>A</p>	<p>G</p>	<p>The Board have identified the Assistant Assessor as the individual with day-to-day responsibility for implementing the <i>Plan</i>.</p> <p>This post is currently vacant. The Keeper has received notification from Dennis Stevenson, Assessor & Electoral Registration Officer, confirming that he will temporarily undertake this role as well as that indicated at element 1. The Keeper’s guidance makes clear that it is possible (although unusual) under the Act for one individual to be identified in both roles this is therefore an acceptable short-term solution. The Keeper requires the Board to inform him when the Assistant Assessor vacancy is filled and the identity and contact details of the new post-holder.</p> <p>The Assistant Assessor’s role is confirmed by the <i>Records Management Policy (see element 3)</i> section 6.4.</p> <p>The Board have provided the Assistant Assessor’s job description and the Keeper agrees this shows responsibility for day-to-day records management in the authority (see element 12).</p> <p>The Assistant Assessor is responsible for the implementation and review of information governance policies.</p>

			<p>Information security breaches and suspected weakness must be reported to the Assistant Assessor (<i>Security Incident and Weakness Policy</i> section 4.2).</p> <p>It is the responsibility of the Assessor (see element 1) and the Assistant Assessor to ensure all staff are familiar with good practice rules concerning information security (<i>Data Security Policy</i> published at http://www.orkney-shetland-vjb.co.uk/DATA%20SECURITY%20POLICY.pdf)</p> <p>The Assistant Assessor is also responsible for risk assessing the physical security of the Board’s premises (<i>Physical and Environmental Security Policy</i> page 2) and the transfer of records outwith the Board (for example <i>Acceptable Use Policy</i> 6.2.9). They are also responsible for authorising the installation of new software and use of memory card, USB drives etc. Following on from this the Assistant Assessor is responsible for measuring the “level of achievement of the information security objective” and reviewing the information security framework (<i>Information Security Policy</i> – see element 8 - sections 3 and 4).</p> <p>The above would suggest that the Assistant Assessor has appropriate responsibility for the day-to-day implementation of the <i>Plan</i>.</p> <p>The Keeper agrees this element of the Orkney and Shetland Valuation Joint Board Records Management Plan under improvement model terms while awaiting the appointment of an Assistant Assessor.</p>
<p>3. Policy Compulsory element</p>	<p>G</p>	<p>G</p>	<p>The Board have a <i>Records Management Policy</i> which has been submitted to the Keeper in evidence. This is the version dated Jan 2017.</p> <p>The Keeper agrees that the <i>Plan</i> supports the objectives of the <i>Records Management Policy</i>. See individual elements below for details.</p>

			<p>The evidence documents (including the <i>Records Management Policy</i>) feature the I drive address, where the Board’s staff can gain access to each, as a footer. The Plan states (under element 8) that “staff have access to the Board’s servers which holds all relevant policies”. For completeness the Board have provided the Keeper with a sample screen-shot from the I drive showing how one of these links appears to staff.</p> <p>The Keeper agrees that Orkney and Shetland Valuation Joint Board have a records management policy statement as required by the Act and that this is published to all staff.</p>
4. Business Classification	G	G	<p>The <i>Records Management Policy</i> (see element 3) requires “The development of a business classification scheme to reflect the functions, activities and transactions of O&SVJB.” (<i>Records Management Policy</i> section 5.1).</p> <p>The <i>Plan</i> supports this aspiration stating in the Introduction that effective records management provides “efficient and systematic control of the creation, storage, retrieval, maintenance, use and disposal of records” and, under element 3, “records management will ensure that all information received or created is stored in the appropriate way and is easily retrievable.”</p> <p>The Board have provided the Keeper with a copy of their <i>Business Classification Scheme</i> which shows the activities they undertake arranged in a functional scheme. This must remain a business decision for the authority, but the Keeper acknowledges that a <u>functional</u> scheme, such as that operated by the Board, is currently considered best practice.</p> <p>The breakdown of record type to Function/Activity/Transaction is sufficient for the Keeper’s agreement under the Act.</p>

			<p>The <i>Business Classification Scheme</i> is supported by the Board’s <i>Records Retention and Disposal Arrangements Schedule</i>, also supplied (see element 5).</p> <p>The Board operate a hybrid system of hard-copy records, line-of-business systems and shared drives (I; G: and K for corporate records and H for personal files).</p> <p>The Keeper agrees that the Board have an approved and operational business classification scheme that covers the functions of the authority.</p>
5. Retention schedule	G	G	<p>Retention decisions around record series held by the Board feature in the <i>OSVJB Retention and Disposal Arrangements - October 2016</i> spreadsheet which has been provided to the Keeper. This combined with the <i>Business Classification Scheme</i> (see element 4) show the business structure, record types created and retention decisions in a suitably clear layout. For example: CORPORATE/OFFICE MANAGEMENT/Application Forms (Unsuccessful)/Restricted/Paper/D 1+3 months</p> <p>The <i>Plan</i> states under element 5: “The Records Retention and Disposal Arrangements Schedule is an essential part of our overall Records Management Plan, ensuring that records are kept for no longer than is absolutely necessary and disposed of as appropriate.”</p> <p>This document facilitates the objective in the Assessor’s <i>Covering Statement</i> (see element 1 and General Comments below) that best practice in records management should ensure information “retained, destroyed or preserved in accordance with the Board’s Retention and Disposal Arrangements.” The <i>Plan</i> acknowledges the importance of this document ‘underpinning’ their records management provision. The importance of the controlled record retention acknowledged in the Board’s published <i>Data Retention Policy</i>: http://www.orkney-shetland-vjb.co.uk/DATA%20RETENTION%20POLICY.pdf</p>

			<p>The <i>Records Management Policy</i> (section 5) (see element 3) commits the Board to “The review and consolidation of the retention and disposal schedule to provide clear guidance regarding the management of O&SVJB records”.</p> <p>The Keeper agrees that Orkney and Shetland Valuation Joint Board has an approved and operational retention schedule that covers the expected record types created by valuation board.</p>
<p>6. Destruction Arrangements <i>Compulsory element</i></p>	<p>A</p>	<p>G</p>	<p>The <i>Covering Statement</i> from the Assessor (see element 1 and General Comments below) states that best practice records management ensures that all information “is retained, destroyed or preserved in accordance with the Board’s Retention and Disposal Arrangements.” (see element 5).</p> <p>The <i>Plan</i> supports this aspiration stating in the Introduction that effective records management provides “efficient and systematic control of the creation, storage, retrieval, maintenance, use and disposal of records” and, under element 3, “records management will ensure that all information is retained, destroyed or preserved in accordance with the Board’s Retention and Disposal Arrangements.” (the Keeper has received these arrangements see element 5).</p> <p>The importance of the controlled and secure destruction of records containing personal information is acknowledged in the Board’s published <i>Data Retention Policy</i>: http://www.orkney-shetland-vjb.co.uk/DATA%20RETENTION%20POLICY.pdf</p> <p>With this in mind the Board has the following procedures in place for the destruction of records:</p> <p><u>Paper (internal)</u>: Paper records are shredded using in-house shredders as required. Staff instructions have been provided to the Keeper.</p>

			<p><u>Paper (external)</u>: The Board have confirmed to the Keeper that no records are stored with a third party storage supplier.</p> <p><u>Electronic</u>: The <i>Plan</i> states under ‘Element 6 Future Developments’: “Consideration is currently being undertaken regarding the management and deletion of electronic records and their retention. These records should be deleted in accordance with this policy when it is finalised and it will include reference to the same limits detailed in the Records Retention and Disposal Arrangements Schedule.” The Keeper requires a copy of this policy when it becomes available. The Plan also states that “Further consideration is being given to the possibility of an automated deletion of records being incorporated into the Board’s IT system, which would ensure the timely destruction of those records deemed to have passed their retention date.” The controlled and systematic deletion of records held on shared drives is a particular area of difficulty for many public authorities and the Keeper welcomes the acknowledgement of this. He agrees that the suggested improvements the Board are considering are a reasonable response to these difficulties.</p> <p><u>Hardware</u>: The Board have provided the Keeper with their <i>Procedure for Disposal of Media</i> policy document. This shows that the two local authority IT departments (Orkney and Shetland) carry out data cleansing of redundant hardware on behalf of the Board. The Keeper agrees this is appropriate. This is supported by published statements appearing in the online <i>Data Security Policy</i> published at http://www.orkney-shetland-vjb.co.uk/DATA%20SECURITY%20POLICY.pdf. The Board have provided the <i>Corporate Services Information Services ICT Systems Secure Data Destruction Operational Policy</i> as evidence that this arrangement is operational.</p>
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			<p><u>Back-Ups</u>: The Board have provided their <i>Back Up and Restore Policy</i>. It states that “Backups are to be taken at a frequency commensurate with agreed business recovery requirements.” The Keeper agrees that continuity back-ups of records are routinely taken (see also element 10). The Board have provided Confirmation from local authorities ICT departments regarding the retention timescales of daily back-Ups.</p> <p>The <i>Records Management Policy</i> (section 5) (see element 3) commits the Board to “The review and consolidation of destruction arrangements to detail the correct procedures to follow when disposing of business information”.</p> <p>The Keeper agrees this element on ‘improvement model’ terms. This means that the authority has identified a gap in its records management provision (specifically that the routine destruction of electronic records after the required retention period is not embedded sufficiently) and have put process in place to close that gap. The Keeper’s agreement is conditional on his being updated as this project progresses.</p>
<p>7. Archiving and Transfer <i>Compulsory element</i></p>	<p>G</p>	<p>G</p>	<p>The <i>Records Management Policy</i> (see element 3) refers to the transfer of records “to an archive for permanent preservation.” (<i>Policy</i> section 3.2), the <i>Plan</i> refers to archiving records (section 2) and the <i>OSVJB Retention and Disposal Arrangements - October 2016</i> (see element 5) indicates the record types that should be permanently preserved.</p> <p>Orkney and Shetland Valuation Joint Board have selected Shetland Islands Council Archives as the proper repository for records selected for permanent preservation. There is a general arrangement whereby the Council Archive Service take public authority records of historical interest and the Board fit in with this arrangement https://www.shetlandmuseumandarchives.org.uk/collections/archive</p>

			<p>As a sample of this arrangement in operation, the Board have supplied the Keeper with an e-mail from Shetland Council which shows that one particular record type (Board Minutes) are accessioned by the Council Archive.</p> <p>The Keeper agrees that Orkney and Shetland Valuation Joint Board have arrangements in place to transfer records for permanent preservation to an appropriate archive as required by the Act.</p>
<p>8. Information Security <i>Compulsory element</i></p>	<p>G</p>	<p>G</p>	<p>The Board have an <i>Information Security Policy</i> which has been provided to the Keeper. This is the version approved by the Management Team in October 2016.</p> <p>The Policy is supported by a suite of other security documents and guidance such as: <i>The Access Control Policy</i>, the <i>Data Access and Building Security Policy</i>, the <i>Security of It Systems – Guidance for Staff</i> and the <i>Security Incident and Weakness Policy</i> (approved by the Management Team October 2016). These supplementary policies have also been provided to the Keeper. They make up part of an overall information security framework ('ISMS') which is explained on page 2 (and on page 8) of the <i>Information Security Policy</i>.</p> <p>Senior Management must review the ISMS at least once a year (<i>Information Security Policy</i> section 3).</p> <p>The information security framework is supported by a series of security documents specifically designed as a response to the demands placed on the authority by the Data Protection Act 1998. The Keeper notes that some of these are published on line for example: http://www.orkney-shetland-vjb.co.uk/DATA%20SECURITY%20POLICY.pdf</p> <p>The importance of information security is acknowledged in the Board's published</p>

			<p><i>Data Retention Policy:</i> http://www.orkney-shetland-vjb.co.uk/DATA%20RETENTION%20POLICY.pdf The <i>Records Management Policy</i> (section 5) (see element 3) commits the Board to “The review and consolidation of information security policies and procedures in order to protect records and systems from unauthorised access, use, disclosure, disruption, modification, or destruction.”</p> <p>Processes to be implemented in the case of an information security breach are described in the <i>Plan</i> and evidence documents.</p> <p>The physical protection of hard-copy records and of servers hosting records is covered by the Board’s <i>Physical and Environmental Security Policy</i>, <i>Information Security Policy</i> (section 3.4) and <i>Acceptable Use Policy</i> all of which have been provided to the Keeper (versions approved by the Management Team October 2016).</p> <p>Guidance on information security is provided by the IT departments of the two local authorities.</p> <p>The Keeper agrees that Orkney and Shetland Valuation Joint Board have current arrangements in place to ensure that records are held securely as required by the Act.</p>
<p>9. Data Protection</p>	<p>G</p>	<p>G</p>	<p>The Board have a <i>Data Protection Policy</i> which has been supplied to the Keeper. This is the version dated August 2016.</p> <p>The Board publish their Data Protection Policy online at http://www.orkney-shetland-vjb.co.uk/DATA%20PROTECTION%20POLICY.pdf</p> <p>The Board have a <i>Data Privacy Notice</i> downloadable from their website. This</p>

			<p>contains a section “Your right to access information”. Subject access arrangements are also mentioned in the published version of the <i>Data Protection Policy</i>. Therefore the Keeper agrees that the Board have made the public aware of their rights under the DPA 1998.</p> <p>The Board is registered with the Information Commissioner: Z6161579</p> <p>The <i>Data Protection Policy</i> explains the (current) 8 principles of data protection.</p> <p>The Data Protection Act 1998 is specifically mentioned in section 2.4 of the <i>Records Management Policy</i> (see element 3). The <i>Policy</i> (section 5) also commits the Board to “The review and consolidation of data protection policies in order to demonstrate O&SVJB commitment to compliance with the Act and the safeguarding and fair processing of all personal data held.”</p> <p>The Board’s staff have been asked to familiarise themselves with <i>Determining What is Personal Data</i>: https://ico.org.uk/media/for-organisations/documents/1554/determining-what-is-personal-data.pdf</p> <p>The information security framework (see element 8) specifically mentions the Data Protection Act 1998.</p> <p>The Keeper agrees that Orkney and Shetland Valuation Joint Board have properly considered their responsibilities under the Data Protection Act 1998.</p>
10. Business Continuity and Vital Records	G	G	<p>Orkney and Shetland Valuation Joint Board have supplied separate <i>Business Continuity Plans</i> for their operations in Orkney and Shetland. The Keeper agrees that these plans consider the recovery of records (for example section 7).</p> <p>The operation of a business continuity management system is specifically listed as a</p>

			<p>'principle' of information security in the <i>Information Security Policy</i> (see element 8) section 3.</p> <p>The <i>Data Security Policy</i> confirms that “Regular back-ups of the information on the file servers are taken off-site and kept in a separate place so that the information is protected.” This is confirmed in the <i>Acceptable Use Policy</i> (section 6.2.3) and <i>Information Security Policy</i> (section 3.7). Frequency of back-up is determined in consultation with the Assistant Assessor (see element 2) – See <i>Back-Up and Restore Policy</i> 3.1.</p> <p>The <i>OSVJB Retention and Disposal Arrangements - October 2016</i> spreadsheet (see element 5) identifies 'vital' records.</p> <p>The <i>Records Management Policy</i> (section 5) (see element 3) commits the Board to “The continuing review of our business continuity arrangements, encompassing strategies to ensure that vital records held by O&SVJB remain accessible and that there are processes in place to monitor the integrity and usability of records.”</p> <p>Robust business continuity arrangements are specifically mentioned as an outcome of efficient information security as the existence of <i>Business Continuity Plans</i> for the Board’s two offices. (<i>Plan</i> element 8). Information security risk assessments carried out by the Assistant Assessor inform the development of business continuity arrangements (for example, <i>Physical and Environmental Security Policy</i> page 2).</p> <p>The Plan explains the back-up cycle for valuation systems. However, the same information is not available for other record types. See element 6.</p> <p>The Keeper agrees that Orkney and Shetland Valuation Joint Board has business continuity arrangements that consider the recovery of records.</p>
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11. Audit trail	A	G	<p>The <i>Covering Statement</i> from the Assessor (see element 1 and General Comments below) states that best practice records management ensures that all information is “easily retrievable” and “Is easily accessible to users and that skills and technology are available to achieve this aim.” These objectives are repeated in the <i>Plan</i> under element 3.</p> <p>The <i>Plan</i> supports this aspiration elsewhere: stating in the Introduction that effective records management provides “efficient and systematic control of the creation, storage, retrieval, maintenance, use and disposal of records” and “faster, more accurate and reliable access to records”.</p> <p>The <i>Records Management Policy</i> (see element 3) specifically refers to the imposition of version control and naming conventions (section 3.2) as being fundamental to control in a shared-drive situation. The Keeper concurs with this assessment. It further refers to tracking of records (also section 3.2) and quick and easy access to records and “Improved business efficiency through reduced time spent searching for information” (section 4.2)</p> <p>In the case of hard-copy files the Board state: “For paper files a simple logging out sheet requires to be implemented for paper property records which will be added to the senior management’s remit.” (Plan element 11). The Keeper agrees this action.</p> <p>The Plan states under element 3 “Metadata determining an audit trail is created for all electronic records within our systems and, where required, through liaison with our local authority IT departments.” The Keeper agrees that certain line-of-business systems operated by the Board will have document tracking functionality built-in. (for an example see <i>Information Security Policy</i> section 3.3.2).</p>
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			<p>However, public records held on shared drives will require manual input following imposed naming conventions. The Keeper would suggest that, for these records, version control and naming convention guidance should be created and disseminated to all staff. The Assessor (see element 1) has acknowledged this recommendation.</p> <p>The Keeper is able to agree this element under ‘improvement model’ terms awaiting sight of those naming convention/version control procedures and of the logging out procedures for paper files. The Keeper’s agreement is conditional on his being updated when these procedures are operational in the Board.</p>
<p>12. Competency Framework for records management staff</p>	<p>G</p>	<p>G</p>	<p>Orkney and Shetland Valuation Joint Board have provided the <i>Job Profile - Assistant Assessor (see element 2)</i> which shows their responsibility to “Manage information and record systems, reviewing and developing for functional use.”</p> <p>However, see element 2 for lack of the identification of an individual.</p> <p>The Keeper accepts that in an organisation of the size of the Board it would not be necessary (or practical) to have a full-time Records Manager.</p> <p>The Board make the following commitment: “The person responsible for operational records management will be afforded the opportunity to attend any relevant courses, seminars or conferences as and when required.” The Keeper welcomes this commitment.</p> <p>The <i>Records Management Policy</i> (section 5) (see element 3) commits the Board as follows “The identification of records management as a distinct stream within the Board’s training aims, with requisite training provided to all staff” and more fully in section 9: “Training will be provided to all staff in order to highlight and increase</p>

			<p>awareness of their responsibilities in line with data protection, freedom of information and records management. Furthermore, core competencies and key knowledge and skills required by staff with operational responsibility for records management will be clearly defined to ensure that they understand their roles and responsibilities, can offer advice and guidance, and can remain proactive in their management of recordkeeping issues and procedures within O&SVJB.” The Keeper commends this commitment.</p> <p>Information security is a set objective for the Board’s staff. This fulfils a training and awareness requirement in the <i>Information Security Policy</i> section 3.</p> <p>The Board make the following commitment in the <i>Plan</i> under this element: “All staff within O&SVJB will receive guidance from each of the local authorities IT departments on data security and operational procedures.” This commitment is supported by statements in the evidential documents (for example the <i>Physical and Environmental Security Policy</i> page 4). The Keeper welcomes this commitment.</p> <p>The Keeper agrees that the individual identified at Element 2 (when appointed) should have the authority and skills required to implement the <i>Plan</i> and that a commitment for appropriate staff training has been supplied.</p>
<p>13. Assessment and Review</p>	<p>G</p>	<p>G</p>	<p>The Act requires a scheduled public authority to “keep its records management plan under review” (part 1 5.1 (a)).</p> <p>The <i>Records Management Policy</i> (section 5) (see element 3) commits the Board to “The completion of a self assessment review, following the implementation of the records management plan in order to ensure that the records management practices remain fit for purpose.” The <i>Plan</i> itself states under element 3 “The Plan will be reviewed at regular intervals to ensure its effectiveness.”</p>

			<p>To this end, the Control sheet and Introduction to the <i>Plan</i> indicates that it will be reviewed annually (first review January 2018). This is confirmed as an objective of the Assistant Assessor under element 12.</p> <p>The Assistant Assessor (see element 2) will review the Records Management Plan and will report all findings to the Senior Management Working Group for final approval. In the interim Dennis M Stevenson as Assessor and RMP author (see element 1) will perform this function.</p> <p>In a governance table submitted with the <i>Plan</i> the Board commit to the following action “Reviewing and implementing policies, procedures and standards. Monitoring projects relating to this plan. Quarterly reporting to be made to SMT.”</p> <p>The O & S VJB is audited annually by Audit Scotland, especially the finance activity, although they also inspect and request where appropriate Business Continuity plans and other Governance items as they see fit.</p> <p>The Senior Management Working Group will consist of three to four staff, one of which will be the RMP reviewer.</p> <p>Most documents submitted in evidence have an annual review period imposed in the control information (biennial in the case of the <i>Records Management Policy</i>). The Assistant Assessor (see element 2) is normally the responsible officer for initialising these reviews.</p> <p>Senior Management must review the ISMS (see element 8) at least once a year (<i>Information Security Policy</i> section 3).</p> <p>The Board’s registration with the Information Commissioner must be renewed by 09 December 2017.</p>
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			The Keeper agrees that Orkney and Shetland Valuation Joint Board has identified period, responsibility and methodology for the review of the Plan as required by the Act.
14. Shared Information	N/A	N/A	Orkney and Shetland Valuation Joint Board state: Generally information is not shared with third parties unless there is a legal requirement such as disclosures under FOI legislation. The Keeper agrees that information sharing with third parties is not a function of the Board and therefore this element does not apply.

Version:

This assessment is on the *Records Management Plan* (the *Plan*) of the Orkney and Shetland Valuation Joint Board (the Board) version 1.0 approved by the Management Team in January 2017. This version was prepared by Dennis Stevenson (**see element 1**).

The *Plan* is accompanied by a statement from Mr Stevenson, Assessor & Electoral Registration Officer (**see element 1**). This statement, dated 17th January 2017, specifically endorses the *Plan* and confirms that it will be reviewed at regular intervals (**see element 13**). Mr Stevenson’s statement is repeated in the *Records Management Policy* (**see element 3**).

The Board acknowledge records as a business asset (for example *Plan* element 3, *Information Security Policy* section 1 or *Records Management Policy* section 1.2). The Keeper commends this recognition.

The Keeper agrees that the *Plan* will assist the Board in fulfilling the objectives of their *Corporate Plan 2016-19*: “manage information and innovate & improve systems to deliver excellence in service delivery and maximise efficiencies and effectively manage our resources to reduce costs while maintaining quality” (*Corporate Plan* page 6) <http://www.orkney-shetland->

vjb.co.uk/OSVJB%20Corporate%20Plan%202016%20-19.pdf and their *Records Management Policy* (see element 3) section 2.4: “the improvement of business efficiency through less time spent searching for information, increased joined up working and improved communications across the organisation as a whole”

The *Plan* mentions the Public Records (Scotland) Act 2011 (the Act) and is based on the Keeper’s, 14 element, Model Plan <http://www.nrscotland.gov.uk/record-keeping/public-records-scotland-act-2011/resources/model-records-management-plan>.

Third Parties:

The Act makes it clear that records created by a contractor in carrying out a scheduled authority’s functions are public records (Part 1 section 3.1 (b)).

The *Plan* states (section 4) “At the present time no function of Orkney & Shetland Valuation Joint Board are carried out by a Third Party.”

However, the Board have indicated to the Keeper the contractual clauses that could be employed if such an arrangement occurs in the future. The Keeper thanks them for this commitment.

Senior Management Working Group:

The Keeper has been provided with the *Remit* of the Senior Management Working Group which shows this group takes responsibility for records management in the organisation (the *Plan* is specifically mentioned). This working group is attended by both the Assessor (**see element 1**) and the Assistant Assessor (**see element 2**).

The remit of the Working Group includes the following responsibilities:

“The Group will prepare, monitor, maintain and update the Board’s Risk Register and Business Continuity Plan.”

“The Group will monitor all Data Protection issues including changes to legislation and respond to any Data access requests lodged with the Board or the Assessor.”

“The Group will develop and implement policies and procedures relating to the RMP [Records Management Plan] and will monitor progress.”

“The Group will review and implement policies, procedures and standards , monitoring these projects in relation to the RMP.”

“The Group will scrutinise and review the plan and all the supporting strategies and policies. Focus will be given to any highlighted Future Developments referred to in the plan and reporting on progress with these developments will be made to the SMT on a quarterly basis.”

It is clear that this group have a fundamental part to play in the records management procedure in the authority and the Keeper thanks the Board for detailing their role.

6. Keeper's Summary

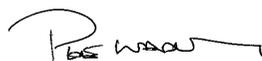
Elements 1 -13 that the Keeper considers should be in a public authority records management plan have been properly considered by the Orkney and Shetland Valuation Joint Board. Policies and governance structures are in place to implement the actions required by the plan.

7. Keeper's Determination

Based on the assessment process detailed above, the Keeper **agrees** the RMP of **Orkney and Shetland Valuation Joint Board**.

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

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



.....
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 Orkney and Shetland Valuation Joint Board. In agreeing this RMP, the Keeper expects Orkney and Shetland Valuation Joint Board to fully implement the agreed RMP and meet its obligations under the Act.



.....
Tim Ellis
Keeper of the Records of Scotland