

The Public Records (Scotland) Act 2011

**Aberdeenshire Council and Aberdeenshire Licensing Board
Progress Update Review (PUR) Report by the PRSA Assessment Team**

27th May 2021

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1. Public Records (Scotland) Act 2011

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

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

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

2. Progress Update Review (PUR) Mechanism

Under section 5(1) & (2) of the Act the Keeper may only require a review of an authority's agreed RMP to be undertaken not earlier than five years after the date on which the authority's RMP was last agreed. Regardless of whether an authority has successfully achieved its goals identified in its RMP or continues to work towards them, the minimum period of five years before the Keeper can require a review of a RMP does not allow for continuous progress to be captured and recognised.

The success of the Act to date is attributable to a large degree to meaningful communication between the Keeper, the Assessment Team, and named public authorities. Consultation with Key Contacts has highlighted the desirability of a mechanism to facilitate regular, constructive dialogue between stakeholders and the Assessment Team. Many authorities have themselves recognised that such regular communication is necessary to keep their agreed plans up to date following inevitable organisational change. Following meetings between authorities and the Assessment Team, a reporting mechanism through which progress and local initiatives can be acknowledged and reviewed by the Assessment Team was proposed. Key Contacts have expressed the hope that through submission of regular updates, the momentum generated by the Act can continue to be sustained at all levels within authorities.

The PUR self-assessment review mechanism was developed in collaboration with stakeholders and was formally announced in the Keeper's Annual Report published on 12 August 2016. The completion of the PUR process enables authorities to be credited for the progress they are effecting and to receive constructive advice concerning on-going developments. Engaging with this mechanism will not only maintain the spirit of the Act by encouraging senior management to recognise the need for good records management practices, but will also help authorities comply with their statutory obligation under section 5(1)(a) of the Act to keep their RMP under review.

3. Executive Summary

This Report sets out the findings of the Public Records (Scotland) Act 2011 (the Act) Assessment Team's consideration of the Progress Update template submitted for Aberdeenshire Council and Licensing Board. The outcome of the assessment and relevant feedback can be found under sections 6 – 8.

4. Authority Background

Aberdeenshire Council is headquartered at Woodhill House, in Aberdeen, making it the only Scottish council whose headquarters are located outside its jurisdiction, as Aberdeen itself forms a different council area (Aberdeen City). Aberdeenshire borders Angus and Perth and Kinross to the south, and Highland and Moray to the west. Aberdeenshire Council, Scotland's sixth largest local authority in population and fourth largest in area, serves a predominantly rural area in North-east Scotland. The main towns are Peterhead (18,800), Fraserburgh (13,000), Inverurie (10,600), Stonehaven (10,400) and Westhill (9300).

The council has devolved power to six area committees: Banff and Buchan; Buchan; Formartine; Garioch; Marr; and Kincardine and Mearns. Each area committee takes decisions on local issues such as planning applications, and the split is meant to reflect the diverse circumstances of each area.

Due to the size of the geographical area Aberdeenshire Licensing Board is divided into three areas: North, Central and South.

5. Assessment Process

A PUR submission is evaluated by the Act's Assessment Team. The self-assessment process invites authorities to complete a template and send it to the Assessment Team one year after the date of agreement of its RMP and every year thereafter. The self-assessment template highlights where an authority's plan achieved agreement on an improvement basis and invites updates under those 'Amber' elements. However, it also provides an opportunity for authorities not simply to report on progress against improvements, but to comment on any new initiatives, highlight innovations, or record changes to existing arrangements under those elements that had attracted an initial 'Green' score in their original RMP submission.

The assessment report considers statements made by an authority under the elements of its agreed Plan that included improvement models. It reflects any changes and/or progress made towards achieving full compliance in those areas where agreement under improvement was made in the Keeper's Assessment Report of their RMP. The PUR assessment report also considers statements of further progress made in elements already compliant under the Act.

Engagement with the PUR mechanism for assessment cannot alter the Keeper's Assessment Report of an authority's agreed RMP or any RAG assessment within it. Instead the PUR Final Report records the Assessment Team's evaluation of the submission and its opinion on the progress being made by the authority since agreeing its RMP. The team's assessment provides an informal indication of what marking an authority could expect should it submit a revised RMP to the Keeper under the Act, although such assessment is made without prejudice to the Keeper's right to adopt a different marking at that stage.

Key:

G	The Assessment Team agrees this element of an authority's plan.	A	The Assessment Team agrees this element of an authority's progress update submission as an 'improvement model'. This means that they are convinced of the authority's commitment to closing a gap in provision. They will request that they are updated as work on this element progresses.	R	There is a serious gap in provision for this element with no clear explanation of how this will be addressed. The Assessment Team may choose to notify the Keeper on this basis.
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6. Progress Update Review (PUR) Template: Aberdeenshire Council and Licensing Board

Element	Status of elements under agreed Plan, 12NOV15	Progress assessment status, 16JUL19	Progress assessment status, 27MAY21	Keeper's Report Comments on Authority's Plan, 12NOV15	Self-assessment Update 16JUL19	Progress Review Comment, 16JUL19	Self-assessment Update as submitted by the Authority since 16JUL19	Progress Review Comment 27MAY21
1. Senior Officer	G	G	G	Update required on any change.	No change	No immediate action required. Update required on any future change.	No change.	Update required on any change.
2. Records Manager	G	G	G	Update required on any change.	Kate Bolsover, Project Officer (Information & Records Management) as updated to National Records of Scotland in January 2018. Additional new evidence: Item 001 Job Profile Project Officer (Information & Records Management)	The Assessment Team thanks Aberdeenshire Council for this update which we have noted. The Assessment Team acknowledge the receipt of the Council's <i>Project Officer (Information & Records management) Job Profile</i> dated July 2016. The Assessment Team thanks Aberdeenshire Council for the inclusion of supplementary evidence around this PUR which they have saved in order to keep the submission up-to-date.	Change to job title and job profile: Kate Bolsover, Information Governance Officer Additional new evidence: Ev01 Job Profile Information Governance Officer	The Keeper's Assessment Team thanks you for this update, and acknowledges the receipt of the IGO's job profile.
3. Policy	G	A	G	The Keeper commends the authority's commitment to enhancing their information management through the objectives outlined in the Information and Records Management Strategy and the Council's Digital Strategy. Updates on the success of these strategies would be welcomed.	The Information Management Strategy 2013-2016 is in the process of being replaced. In its place a new strategy: The Data and Information Strategy is in draft and is currently with internal stakeholders for consultation. A copy of the draft is available should the Assessment Team wish to see it. Update on Information Management Strategy 2013-2016: The Strategy identified key projects and initiatives, including the use of a Unique Citizen Reference Number (UCRN) and the Unique Property Reference Number (UPRN). These have been key in the development of the Master Data Management	The Assessment Team have noted the developments explained in the PUR. As expected, the Information Management Strategy upon which the original Aberdeen Council submission was based is being reviewed. It is clear that this work is some considerable way towards completion and the Assessment Team look forward to further updates in subsequent PURs. For the SharePoint project see under element 4 below. As the <i>Information Management Strategy</i> is technically out-of-date and the new <i>Data and Information Strategy</i> is draft this element would probably receive an 'amber' (improvement model) rating if this were a formal resubmission.	A new Information Strategy was approved in September 2020, and a new Digital Strategy approved January 2021. The Information Management Policy is currently being reviewed. Additional new evidence: Ev02 Information Strategy Ev03 Digital Strategy 2020-2025	The Assessment Team appreciates this update. Organisation-wide Information and Digital Strategies are very helpful in indicating the direction and longer-term priorities, and the Assessment Team commends the commitment to analogue and digital information management that they infer. More specific policies on records management, such as the Information Management Policy, and their practical implementation in the

				<p>(MDM) project. The Master Data Management system is expected to go live in April 2019 incorporating Council Tax and Contact Centre systems. Further business systems are in the pipeline for inclusion in future phases (over the next 24 months). MDM will enable the creation of a single view ('golden record') of citizens. MDM uses 16 data attributes, including UCRN and UPRN. MDM will reduce duplication and improve the accuracy and currency of information held by the council.</p> <p>Progress on the use of SharePoint for records storage and management as outlined in the Records Management Plan has been slower than anticipated. It was recognised that with technological changes and an increased records management functionality within SharePoint Online, a review of the available options was required. In 2018 a new business case and comprehensive survey of user requirements was completed.</p> <p>The ICT Digital Strategy – Innovate Aberdeenshire – is still current. The integration of systems and the improved efficiency, accuracy and efficacy of information continues to drive programmes of work, including MDM and the SharePoint project.</p>			<p>day-to-day running of the authority may be more indicative of specifically <i>how</i> these aims are to be accomplished in the operation of the organisation.</p> <p>The Team is contented to change this element back to Green, with the expectation that alongside the new commendable strategy statements, the Information Management Policy is kept up to date and reviewed regularly according to an established review schedule.</p>	
4. Business Classification	A	A	A	<p>The Council is currently developing a Business Classification Scheme (BCS) based upon the Local Government Classification Scheme (LGCS). Work has already taken place to identify the main functions and classes of records within the authority and the Council have also indicated that they will implement</p>	<p>Work on file plan is now focussed on the organisation of records in SharePoint and combining the flat structures recommended by Microsoft, with the operational needs of the services and the benefits of the functional organisation that the LGCS provides. This is a work in progress in consultation with the services.</p>	<p>The Council is developing and rolling out a SharePoint solution. This is bound to be incremental and while this work continues this element remains at 'Amber' (improvement model).</p> <p>The Keeper's Assessment Team agrees that a major migration such as the Council's SharePoint solution is an ideal opportunity to centralise structures (such as a Business Classification Scheme) and ensure that all record types are included. A migration also</p>	<p>The Council has adopted the Local Government Functional Classification scheme as the basis for its classification scheme. The scheme has been developed to reflect the functions and terminology of a Scottish local authority through consultation with Services. The new classification scheme is being rolled out in line with the move from shared drives to Microsoft 365 for the storage of records.</p>	<p>Thank you for this update on the adoption of the Local Government Functional Classification Scheme alongside the move from shared drives to Microsoft 365.</p> <p>The inevitable impact of COVID-19 on the progress of the</p>

				<p>SharePoint to help provide an authority-wide solution to managing their electronic records.</p> <p>The Improvement Plan states that the transfer of files from the shared drives to the file-plan structure will continue till 2017, at which point the Council will be able to draw together a comprehensive BCS.</p> <p>These endeavours are commended by the Keeper and he requests updates on the progress of the work. He specifically requests sight of the BCS once finalised.</p> <p>The Keeper can agree this element on an 'improvement model' basis. This means that the Council has identified a gap in provision (lack of a comprehensive council-wide BCS) and has identified a solution to close this gap. This agreement is conditional upon the Keeper being kept informed of progress.</p>	<p>Corporate guidance for services' folder structures is to use the LGCS within network drives. Services are encouraged to use this structure. However, the council acknowledges that not all services' use this structure consistently.</p> <p>The decision to move most records to SharePoint provides the opportunity to implement a consistent structure with better corporate control.</p> <p>It is anticipated that records to remain on the network drives will be those not suited to storage on SharePoint e.g. CAD files. The files structure for these files will mirror the structure adopted in SharePoint/the LGCS.</p> <p>As part of preparations for recent changes in data protection legislation, Information Asset Registers were created for records concerning personal data. These continue to be developed and are living documents. The Information Asset Registers can be used to help with the structuring.</p>	<p>offers the opportunity to arrange a data cleansing exercise.</p> <p>The Assessment Team looks forward to updates on this major project in subsequent PURs. While the work is progressing this element remains at 'Amber'.</p>	<p>The classification scheme is available as managed metadata to services so that files can be labelled with the appropriate classification regardless of their location within M365.</p> <p>The project to implement a SharePoint solution was put on hold temporarily in March 2020 due to reallocation of resources because of the Covid19. Furthermore, the scope of the project was reduced to replacing the current EDRMS with changes to records management functionality by Microsoft under the Council's current licenses.</p> <p>Phase 1 of the project will see records currently stored in HP Records Manager 8 (RM8) migrated to SharePoint and managed by use of Records365. Records365 by RecordPoint has been procured as a 'bolt-on' to M365 to manage records previously held in RM8. Housekeeping on RM8 has been ongoing, with records now ready to be migrated to M365/Records365.</p> <p>Phase 2 of the project will see the migration of records from shared drives to SharePoint. In the meantime, shared drives continue to be used by staff for their records. Housekeeping on shared drives continues, although progress has been hampered by reallocation of resources since March 2020 and network limitations caused by staff working from home. DROID from the National Archives has been made available to staff to assist them with drive analysis and clean up.</p> <p>Discussions are currently underway about the most appropriate method of migrating records from shared drives to M365.</p> <p>Records will be stored in M365 in an organisational structure; however, this will be mitigated by the use of the classification scheme as</p>	<p>implementation of a SharePoint solution has also been noted. This is unfortunate but understandable. It seems that while progress has been halted, there is a solid phased plan in place when the resources allow for its continuation.</p> <p>The adoption of DROID has also been noted with thanks. The Team also acknowledges the attachments provided.</p> <p>This element will remain at Amber status until M365 and Records365 have been fully implemented and policies accordingly updated. Migrating the systems to M365 will take a significant amount of time and resources, but Aberdeenshire Council and Licencing Board appear to be well-placed to continue implementing the accompanying changes.</p> <p>The Assessment Team would be keen to be kept updated on the progress in consecutive PURs.</p>
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5. Retention Schedule	A	A	A	<p>The Council acknowledges that retention schedules are not applied uniformly across the authority, especially in the case of records held on shared drives and bespoke business systems. The adoption of the new EDRMS is expected to help standardise practice. The Keeper would welcome updates on the work being taken in this area.</p> <p>The Improvement Plan states that work to develop a Retention and Disposal Policy will be completed by 2016 and that the new schedules will be rolled out in 2017. There is also a commitment to develop staff training in this area. The Keeper welcomes these initiatives and requests that the relevant documents and evidence are sent to him once available.</p> <p>The Keeper commends the regular auditing of paper records and would be interested to learn how often these audits are conducted.</p> <p>The Keeper can agree this element on an 'improvement model' basis. This means that the Council has identified a gap in provision (consistent Council-wide use of retention schedules) and has identified measures to close this gap. This</p>	<p>The Council uses the Scottish Council on Archives Record Retention Schedules (SCARRS) as its record retention schedules.</p> <p>Some services have created more granular guides to SCARRS in order to support their staff in identifying specific types of records and their retention periods.</p> <p>Where a service requires a retention period different to that in SCARRS either due to business need or because of differing interpretation of legislative requirement, that variation is agreed in consultation with the Project Officer (Information & Records Management), who then logs the variation.</p> <p>A review of retention periods for the Health and Social Care Partnership is underway to assess the suitability of the retention periods within SCARRS for the records held by the Partnership.</p> <p>SharePoint is not yet being used for records management. Records continue to be stored on RM8 and shared drives, as well as bespoke business systems.</p> <p>There is still no facility to automatically apply retention policies to the records held on shared drives. The record owners are required to carry</p>	<p>The adoption of a SharePoint solution is liable to provide a standardisation of retention procedures, although the Assessment Team recognises that some data sets and hard-copy records will have to have retention/disposal decisions applied 'manually'. The Council have acknowledged this.</p> <p>It seems that staff guidance on the application of retention periods is now distributed to all staff. This is commendable.</p> <p>The Assessment Team notes that in two areas, HSCP and paper records, the application of retention decisions is still under development.</p> <p>While this work is progressing and while the SharePoint solution is rolled out and bedded in this element is liable to remain 'Amber'.</p> <p>The Assessment Team looks forward to updates on retention procedures in subsequent PURs.</p>	<p>The Council continues to use SCARRS as the basis for its record retention schedules, with some locally identified variances.</p> <p>The review of record retention within the Health & Social Care Partnership was completed in 2019, and work has begun on a similar review of Early Years and Education records to be conducted during 2021.</p> <p>Retention and disposal continue to be carried out manually on shared drives. It is anticipated that for records currently held on shared drives this manual management will continue to be required when records are migrated to M365 due to the limited ability to apply automatic retention under our current M365 licenses.</p> <p>For those records held in M365 with the Records365 bolt-on, automatic retention will be applied in line with the Council's retention periods and disposal actions.</p> <p>Staff continue to be reminded of their responsibility to pass records for preservation to the Archive Services and otherwise dispose of records beyond their retention period, including via the Information & Records Management Group (which along with the Data Protection and Freedom of Information Working Group has replaced the Information Management Operational Group).</p>	<p>The continuing use of SCARRS is noted by the Assessment Team. The collaborative approach to the creation of records retention policies is also noted with thanks.</p> <p>The status of this Element remains Amber while the implementation of SharePoint to replace shared drives is ongoing. The manual retention and disposal of records on shared drives, as well as transfer to archives, is labour-intensive, but absolutely essential. As mentioned, M365 combined with Records365 bolt-on should make this key responsibility smoother in the long run.</p> <p>The update on non-digital records is also much appreciated, especially as the impact of home-working has been significant in that regard. The attached Physical Records Storage Guidance has also been received with thanks.</p>

				<p>agreement is conditional on the Keeper being kept informed of progress in this area.</p> <p>out retention and disposal actions manually.</p> <p>Reminders to record owners of their responsibility to dispose of records beyond their retention periods are given via Yammer and the council's internal website. These reminders cover digital and physical records.</p> <p>This reminder is also cascaded by members of the Information Management Operational Group on a regular basis.</p> <p>A current review of physical records is being undertaken led by members of the Information Management Operational Group, in liaison with the Archive Service. It is anticipated that this will be an iterative process going forward.</p>		<p>Further to a review of physical records storage sites carried out in 2018, a 'Storage – Paperless and Digitisation' workstream has been established as part of the Office Space Strategy. A review of existing files and records held within offices is to be carried out to identify records past retention, records that can be transferred either to the Archive Service for permanent preservation or to offsite storage for medium to long-term storage. The Workstream is currently on hold due to the pandemic, but it is anticipated that once work recommences it will improve the management of physical records.</p> <p>Additional new evidence: Ev08 Physical Records Storage guidance</p>	<p>While several important initiatives have been paused, this Element will remain in Amber. The Assessment Team looks forward to updates on the success of the paperless workstream implementation in consecutive PURs.</p>	
6. Destruction Arrangements	A	A	A	<p>The authority recognises that there is not currently a controlled process for the destruction of electronic records held on shared drives. To improve this situation the Council are committed to developing the BCS and retention schedules by 2016.</p> <p>There is a similar issue surrounding records held within the bespoke business systems. The Improvement Plan has identified the need to include retention and disposal functionality when developing specifications for new systems and allaying this to the retention schedules.</p> <p>The Keeper commends the Council's efforts to rectify the problems surrounding these digital records and requests updates on progress in these areas.</p> <p>The Keeper would also like sight of a copy or template</p>	<p>As before, there is still no controlled process for the destruction of electronic records on shared drives, however, record owners are made aware of their responsibilities to apply the appropriate retention and disposal actions to records in their care. Reminders on the need to carry out regular reviews and subsequent destruction of items past retention is cascaded by the Information Management Operational Group.</p> <p>When developing functionality in new business systems internally, and procuring external systems, the ability to dispose of records is now a consideration. These requirements would form part of the service specification or statement of requirements.</p> <p>Guidance on the disposal of confidential waste, including paper waste, other media and ICT hardware, was reviewed and revised in 2018. Updated</p>	<p>The move away from shared drives to the SharePoint solution (see element 4) should help standardise the destruction of electronic records.</p> <p>The Assessment Team notes that record disposal is now considered at an early stage in the development of business processes. This is highly commendable and marks an improvement in provision.</p> <p>The Assessment Team notes that new staff guidance is available and acknowledges that examples have been supplied. They will store these to keep the Council's submission up-to-date.</p> <p>In the case of a formal re-submission the Keeper might consider that this element is fully compliant. In order to do this he would need to see convincing evidence that staff guidance in the destruction of digital records on shared drives was being followed (perhaps a monitoring exercise or audit).</p> <p>However, for the moment and as with element 4 and 5 above, while the SharePoint solution is being implemented this element will remain at 'Amber'.</p>	<p>No change.</p> <p>Records remain stored on shared drives with a dependence on record owners to manually destroy records beyond retention. Record owners continue to be reminded of their responsibilities around the application of appropriate retention and disposal actions.</p> <p>As previously noted, a period of intensive work began in late 2019 to carry out cleansing of files stored within shared drives. Staff were provided with housekeeping guidance and with access to the DROID tool to support their identification of records that were beyond retention (along with ROT) for disposal.</p> <p>In the first four months of 2020 the volume of data held on shared drives was reduced by approximately 2Tb to under 28Tb, however work on this slowed considerably in Spring 2020 with the reallocation of staff and prioritisation of Covid19-related</p>	<p>The Assessment Team thanks the Aberdeenshire Council and Licencing Board for this update concerning destruction arrangements. While there has been no change to destruction arrangements since the last PUR, it is acknowledged that the COVID-19 pandemic has had a significant impact on the authority's ability to implement changes to existing systems. However, the Team acknowledges that some progress has been made, and that there are clear indications that the Council and Licencing Board recognise the importance of controlled destruction arrangements, and that</p>

				<p>contract once developed if the Council opt to build records destruction into contracts with third parties.</p> <p>The Keeper can agree this element on an 'improvement model' basis. This means that the authority has identified a gap in provision (the destruction of electronic records held on bespoke business systems outwith TRIM and shared drives) and has shown a commitment to closing this gap over time. The agreement is conditional upon the Keeper being kept informed of progress in this area.</p>	<p>guidance on identifying confidential information was issued in 2019.</p> <p>Additional new evidence: Item 001 What is confidential information guidance Item 002 Secure destruction of confidential waste guidance.</p>		<p>work. Options for supporting services to carry out further effective cleansing of shared drives are currently being explored.</p>	<p>the authority is working to keep records destruction arrangements on the agenda.</p> <p>This Element will remain at Amber.</p>
7. Archiving and Transfer	G	G	G	<p>The Keeper commends the Council's development of a digital preservation strategy to ensure that electronic records can be transferred to the archive when appropriate. The Keeper would be interested in seeing this document once it has been finalised.</p>	<p>The collaborative arrangement with Aberdeen City Council for the Aberdeen City and Aberdeenshire Archives still stands, as do the policies and procedures.</p> <p>The collaborative arrangement and the delivery arrangements of the archive service is currently under review within Aberdeenshire Council.</p> <p>The development of a digital preservation strategy was a precursor to a current proposal for a digital archive repository. The project proposal has come from Aberdeen City Council with the potential for Aberdeenshire Council to collaborate.</p>	<p>The Assessment Team thanks the Council for this update. The Keeper has a particular interest in the development of digital archive repositories in Scotland and looks forward to further updates in subsequent PURs.</p>	<p>A review of the Archive Service was carried out in 2019 and a new collaboration agreement is now in place between Aberdeen City Council and Aberdeenshire council for the Aberdeen City and Aberdeenshire Archives.</p> <p>As part of the agreement, an Archives Steering Group has been set up with representatives from across the services and from the Archive Service.</p> <p>Archives staff have undertaken Digital Preservation: Novice to Know How training.</p> <p>Archives staff are assessing the viability of Preservica as a digital preservation repository with Aberdeen City Council IT staff. This would initially be used as a repository for City Council records with the option to extend this to Aberdeenshire records in the future</p> <p>Additional new evidence: Ev09 Collaboration Agreement Ev10 Archive Steering Group Terms of Reference</p>	<p>The Assessment Team thanks for this update on Archive Service review and the resulting collaboration agreement between Aberdeen City Council and Aberdeenshire Council archives, including the attached documentation.</p> <p>The viability assessment of procuring digital preservation facilities, as well as archives staff training in digital preservation, is also noted with thanks. For further comments on staff training, see Element 12.</p>
	G	G	G	Update required on any change	Off-site storage is now provided by Oasis Group, but	The Assessment Team thanks the Council for this update.	A new Information Security Policy was approved in November 2020. It	The Keeper's Assessment Team is

8. Information Security					<p>with the same arrangements as before.</p> <p>The contract for off-site records storage is due for tender in 2019. Requirements for the replacement service have been established.</p> <p>The planned use of SharePoint for electronic records management will involve access management to control the permissions and access available to information held on SharePoint. Office365 is certificated to hold information with the government security classification OFFICIAL. The use of SharePoint will enhance the security of records currently stored on shared drives with increased control over access and permissions, and audit trails.</p> <p>Secure on-site storage for semi-current records is now available at the Council Headquarters in a secure storage room.</p> <p>An internal Cyber Security Awareness page has been established with tools and resources to support staff to stay safe online, including password guidance, aligned to ISO27001.</p> <p>The council achieved Cyber Essentials Stage 1 accreditation in 2018, and is currently working towards Stage 2, Cyber Essentials Plus, with the aim of achieving this by end of April 2019.</p> <p>The council is in the process of going through PSN accreditation at present. Accreditation for PSN and Cyber Essentials requires us to have an independent health check carried out by a CREST and CHECK accredited assessor.</p> <p>Aberdeenshire Council is a Cyber Catalyst and signed up</p>	<p>The implementation of the SharePoint solution (see element 4) should offer greater control of the authority's public records and therefore make imposing security arrangements simpler across the organisation.</p> <p>The Assessment Team acknowledge the receipt of a new guidance document to supplement the suite of policies and codes of practice originally supplied in evidence. This new document has been stored to keep the Council's submission up-to-date.</p> <p>The update regarding formal accreditation has been noted and will be retained in order that the Council's submission can be kept up-to-date. The Assessment Team look forward to an update regarding PSN accreditation at the next PUR. The Assessment Team acknowledge receipt of evidence around accreditation.</p> <p>Also to be commended is the creation of an 'information security page' on the Council's intranet. Staff awareness raising is a vital part of information security and it is likely that the development of a dedicated area of the intranet devoted to this issue will be very useful. A screen-shot has been supplied.</p>	<p>sets out the Council's Information Security Framework and procedural documents.</p> <p>From January 2021, Information Security awareness training has been available to all staff. Staff also have access to the Council's Information Security Policy and associated procedures via the Council intranet.</p> <p>Third party suppliers must, at a minimum, be Cyber Essentials Accredited.</p> <p>Council IT Security Working Group meets regularly and is tasked with reviewing information security incident reports, initiating corrective and preventative action as appropriate, and ensuring our ongoing compliance with our accreditation requirements and industry standards.</p> <p>Aberdeenshire Council now has Cyber Essentials Plus and PSN Accreditation.</p> <p>Work is ongoing to put in place a new security classification mandatory code of practice.</p> <p>Additional new evidence: Ev11 Information Security Policy</p>	<p>pleased to hear of recent updates to the Information Security policy (attachment received with thanks), as well as of the regular meetings of the Council IT Security Working Group.</p> <p>The availability of information security awareness training to all staff from January 2021 is also noted with thanks. For further comments on staff training, see Element 12.</p> <p>The Aberdeenshire Council's accredited status with both Public Services Network and Cyber Essential Plus is noted. The requirement for third party suppliers to be at least Cyber Essentials Accredited speaks of diligence.</p> <p>The Team will be keen to hear of progress in the development of a new security classification mandatory code of practice in consecutive PURs.</p>
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				to this in December 2017. The council also has a cyber incidents plan and is working with Scottish government to improve and make standardised across the public sector. Additional new evidence: Item 001 Password guidance Item 002 Screenshot of Cyber Security Awareness page Item 003 Cyber Essentials Stage 1 certificate Item 004 PSN Connection Compliance Certificate, February 2018				
9. Data Protection	G	G	G	The Keeper commends the thoroughness of the Council's provisions under this element. He would be interested in hearing of any changes to policies and codes of practice following their review by the Information Security Management Group.	Element 9 has seen several changes due to the implementation of GDPR and the Data Protection Act 2018. A full revision of this element has been conducted with accompanying evidence.	As with all other Scottish public authorities Aberdeenshire Council have been required to review and update their data protection procedures in light of the 2018 legislation. The Assessment Team acknowledges that the public facing Aberdeenshire Council website has been updated appropriately: https://www.aberdeenshire.gov.uk/online/legal-notices/data-protection/ The Assessment Team also acknowledge receipt of a new suite of policy and guidance documents which provide an update on the authority's response to the latest developments. The Team thank Aberdeenshire Council for supplying these. They have retained them in order that they may keep the Aberdeenshire Council submission up-to-date.	The Data Protection training course created in 2018 was revised in 2020. 80% of staff and elected members have undertaken training within the past two years. The Data Protection Officer produces a monthly report to Directors, and an annual report for the Council's Audit Committee. Since the last update, a Data Protection and Freedom of Information Working Group has also been set up Additional new evidence: Ev12 ICO Registration for Aberdeenshire Council Ev13 ICO Registration for Licensing Board Ev14 DPO Annual Report 2019/2020 Ev15 Data Protection and Freedom of Information Work Group Terms of Reference	This update regarding Data Protection training is noted with thanks. For further comments on staff training, see Element 12. The regular reporting of the Data Protection Officer to the Directors is a good sign of keeping Data Protection on management agenda. The working group also indicates commitment to continuing improvement in this area. The attached evidence is also noted with thanks.
10. Business Continuity and Vital Records	A	A	A	The Keeper commends the regular testing and review of the Business Continuity Policy (BCP) and the establishment of a series of checklists to ensure that such reviews are carried out in a consistent manner. The Keeper would be interested to learn about the effectiveness of these checklists and whether	Business Continuity Plans are subject to regular review through the council's Risk Manager. Within the Governance Structure the Corporate Risk Management Steering Group maintains an oversight of the Business Continuity Management System whilst Internal Audit regularly review the process.	Since the Aberdeenshire Council's original submission in 2015 the business continuity/recovery provision in the Council has been under regular review and the Keeper's Assessment Team acknowledge that they have provided evidence of these reviews. The Assessment Team also acknowledge that some of the business continuity documents have been reviewed and that new versions have been provided.	No change - Business Continuity plans continue to be subject to regular review through the Council's Risk Manager.	The Keeper's Assessment Team acknowledges that the regular review process of the Business Continuity Plan continues, and that no changes have taken place since the last PUR. This Element remains at Amber.

				<p>changes have taken place following these tests and reviews.</p> <p>The Council is developing a procedure for the identification of vital records. The Keeper commends this initiative and requests that he is informed once this development has been completed.</p>	<p>Each Service is responsible for the identification of vital records, or vital systems. Business Impact Analyses are carried out to identify critical information – including vital records – to carry out the critical activities of the service.</p> <p>Business Impact Assessment and Business Continuity templates and guidance have been reviewed and updated.</p> <p>ICT conducted a review of the Disaster Recovery Plan and the procedures for the maintenance and destruction of back up tapes. This is now controlled automatically by Commvault. Once the back-up retention period has expired the tape is reused. This is the fourth year that the Commvault back up system has been in place.</p> <p>Additional new evidence: Item 001 Business Continuity Policy & Procedures V2 Item 002 BIA Guidance Item 003 BIA Workbook Item 004 Service Business Continuity Plan Template Item 005 BCP Test 1 Item 006 BCP Test 2 Item 007 BCP Test 3 Item 008 BCP Test 4 Item 009 BIA Documentation Review Item 010 BCP Documentation Review Item 011 Business Continuity & Emergency Planning Plan Monitoring Schedule Item 012 Business Continuity Planning – Internal Audit Report 1815 (all actions completed within timescales shown)</p>	<p>In their original submission Aberdeenshire Council committed to updating relevant policy documents on a regular basis. The Assessment Team appreciates the confirmation that this is being done.</p> <p>It is noted that the Council have involved services in the business continuity arrangements for their local area. The involvement of local business areas in information governance issues that affect them is commended.</p>		
11. Audit Trail	A	A	A	<p>The Council has identified that there is little or no audit trail provision for records held within the shared drives. Options are being explored to rectify this situation and it is anticipated that the</p>	<p>Shared drives are still being used to store records. The Council acknowledges the lack of audit trail for records within the shared drives.</p> <p>Version history and change tracking is available within</p>	<p>One of the principle improvements that can be expected from the implementation of the SharePoint solution (see element 4) is around document tracking – although naming conventions will still need to be imposed by the document creator, version control should be more robust.</p>	<p>No change. The limited progress of the EDRMS project because of Covid19 and records management functionality changes within M365 has resulted in no improvement in this area so far. We continue to have no real audit trail beyond creation</p>	<p>The Keeper's Assessment Team acknowledges that no changes have taken place since the last PUR.</p>

				<p>development of the BCS and full implementation of the new EDRMS will remedy this. The Keeper requests that he is kept informed of this work as it progresses.</p> <p>The Keeper would also be interested in receiving updates on how services without the bespoke systems are able to track the movement of paper records held onsite.</p> <p>The Keeper can agree this element on an 'improvement model' basis. This means that the Council has identified a gap in provision (lack of audit trail provision in shared drives) and has identified a solution to close this gap. This agreement is conditional upon the Keeper being kept informed of progress.</p>	<p>commonly used Microsoft applications e.g. Word, Excel.</p> <p>Bespoke systems and RM8 are used to track paper records held onsite. The tracking of physical records using SharePoint is being investigated.</p>	<p>The Assessment Team looks forward to further updates as the SharePoint project progresses. As this work continues this element remains at 'Amber'.</p>	<p>and latest modification metadata for all records held on shared drives.</p> <p>Staff continue to be encouraged to use the Council naming conventions, including in relation to version numbering, however it is anticipated that even with the current limitations around the audit trail within M365 that the movement of records to SharePoint will improve the audit trail.</p>	<p>The Keeper's Assessment Team acknowledges the disruptive impact of the COVID-19 pandemic and looks forward to updates with regard to the mentioned developments in audit trail processes in consecutive PURs.</p> <p>This Element remains at Amber.</p>
12. Competency Framework	G	G	G	<p>The Keeper welcomes the range of staff training put in place by the Council and would be interested to hear of any further developments following reviews of the information management training by the Records Management Group.</p> <p>The Keeper would also like to receive updates of the review of training programmes following the implementation of the new EDRMS.</p>	<p>In 2017 Aberdeenshire Council reviewed the Employee Annual Review process and launched the Personal Performance Plan. The purpose of the Personal Performance Plan is to encourage a meaningful conversation between the individual and their line manager. Reviewing performance against Aberdeenshire Principles and the Service areas values. It aims to encourage more discussion and planning around personal development in skills and behaviour. The Personal Performance Plan is documented.</p> <p>In 2018, service representatives with responsibility for Freedom of Information and/or records management responsibility received three days training from an external trainer, one day of which was focussed solely on records management.</p>	<p>In the original agreement for this element the Keeper Stated: "The Keeper agrees that the Council recognises the importance of records management as a distinct area of responsibility for certain staff and has shown a commitment to providing training." The PUR would suggest that this remains the case.</p> <p>The Assessment Team notes the recognition by the Council of the importance of training on the SharePoint solution as it is rolled out. This is, of course, vital.</p> <p>The Council has implemented a new 'Personal Performance Plan' system and the Assessment Team thank them for including the relevant template and guidance in their evidence pack. If the Council chose to make a formal re-submission of their Plan, a copy of the completed Performance Plan for the individual identified at element 2 might provide strong evidence of suitability (of course, the Keeper cannot demand to see this this personal document).</p> <p>The Assessment Team notes that Aberdeenshire Council has chosen to leave the Information and Records Management Society. While the PRSA Team endorses</p>	<p>The Information Governance Officer maintains her continuing professional development with the support of the Council, by attending regular meetings and webinars from the IRMS, SCA, ASLAWG, etc, and through active networking with peers from other public authorities across Scotland. She is an individual member of both the IRMS and ARA.</p> <p>New online training – An Introduction to Records Management - was written and made available to staff in August 2020. Staff who create or manage records as part of their role are encouraged to undertake the training as part of their induction and on a regular basis thereafter.</p> <p>Staff with a significant records management element to their role are encouraged to maintain and develop their professional knowledge with regular notifications of relevant external events, webinars, training, etc. shared via</p>	<p>The Team acknowledges that the Council now supports all of its staff through a new records management online training course.</p> <p>The support given to the continuing professional development of the Information Governance Officer is also commendable. The attached Personal performance Plan is also noted with thanks.</p> <p>It is particularly good to hear that archive staff has also received basic training in the preservation of digital records through the Digital Preservation Coalition's Novice to Know-How training</p>

					<p>The plan is to commence the move from RM8 (formerly TRIM) to SharePoint- The appropriate training and guidance will be delivered to support this change.</p> <p>Aberdeenshire Council is no longer a corporate IRMS member. The Project Officer (Information & Records Management) is supported to attend National Records of Scotland events.</p> <p>Additional new evidence: Item 001 Personal Performance Plan Item 002 Personal Performance Plan guidance notes</p>	<p>membership of this organisation, this must remain a business decision for the Council.</p>	<p>the Information & Records Management Group.</p> <p>Additional new evidence: Ev16 Kate Bolsover, Information Governance Officer, Personal Performance Plan, 2021</p>	<p>(see Element 7), that information security awareness training is available to all staff (Element 8), and that Data Protection training is undertaken by the vast majority of staff and elected members, and that the content has been recently reviewed (Element 9). This will help the Council keep up with the rapid developments in global digital landscape.</p>
<p>13. Assessment and Review</p>	<p>A</p>	<p>A</p>	<p>G</p>	<p>The Council have committed to annually reviewing the RMP, although the self-assessment methodology for carrying this out has yet to be determined. It is anticipated that the basis for carrying out the reviews will be The Improvement Plan, with any major issues being referred to Internal Audit for further investigation. The Keeper commends this approach and would like to hear of the work being done in this area.</p> <p>The Keeper can agree this element on an 'improvement model' basis. This means that the Council has identified a gap in provision (lack of a self-assessment mechanism) and has identified a solution to close this gap. This agreement is conditional upon the Keeper being kept informed of progress.</p>	<p>The Information Management Operational Group was formed in December 2016 and is responsible for:</p> <ul style="list-style-type: none"> • Information Management • Records Management • Freedom of Information • Data Protection • Information Security • Cyber Security • Any other information-related matters e.g. EIR, Inspire, Open Data, etc. <p>The Information Management Operational Group is chaired by the council's Data Protection Officer and includes in its membership representatives from within services with responsibilities for information and records management, Data Protection, and Freedom of Information, along with the Project Officer (Information & Records Management) (named in Element 2) and representative from the Archive Service. The Group is involved in reviewing the Records Management Plan.</p> <p>Additional new evidence:</p>	<p>In order that this element could be considered as fully compliant at the time of a formal re-submission, the Keeper would have to be confident that systematic and regular review of the implementation of the RMP were taking place.</p> <p>The Assessment Team would need clear statements, and potentially evidence, regarding:</p> <p>a) Who carries out the review – The PUR would suggest their Information Management Operational Group, probably with the Project Officer (Information & Records Management) taking the lead. The Assessment Team acknowledge the receipt of the Terms of Reference of the Information Management Operational Group.</p> <p>b) When are reviews carried out: The original submission said 'annually'. Besides this PUR, have there been any reviews of the Plan?</p> <p>c) How the results of the review are reported up.</p> <p>d) The methodology of review. The original agreement stated that "The self-assessment methodology for carrying out the review has yet to be determined". Has that changed since 2015?</p> <p>There is no mention in the PUR of the Improvement Plan submitted with the original RMP. Is this document still being used?</p>	<p>One of the core purposes of the Information & Records Management Group is the regular reviewing of the Records Management Plan and its implementation. Review of the Records Management Plan is done on a rolling basis at meetings carried out on a 6-weekly basis. Assessment of progress was also conducted in 2019 for the previous PUR.</p> <p>In 2020, the Information & Records Management Group approved a new more formalised methodology for assessment and review. The foundation of this is a Maturity Model based on the Records Management Plan, compliance with current Council policy and also good practice. Intended as part of an annual review, it is being used by services to assess progress against the Records Management Plan and records management maturity. The results from this survey will be the basis for a new Improvement Plan.</p> <p>Results from the annual review will be shared with the Principal Information Governance Officer, the Legal Services Manager, and with services.</p>	<p>The Assessment Team is grateful for this update on the implementation of new methodology for assessment and review of the Records Management Plan against a Maturity Model. This shows significant improvement, but also commitment to continuing improvement in this area.</p> <p>The Assessment Team acknowledges the receipt of the attached documentation with thanks. Based on improvement in this area, it is contented to change the PUR status of this element from Amber to Green.</p>

					Item 001 Information Management Operational Group Terms of Reference	<p>It should be noted that the completion of this Progress Update Review can be considered as evidence of the commitment to review committed to in the original submission. However, the Keeper is likely to ask how the implementation of the <i>Plan</i> is tested in the different service areas.</p> <p>Aberdeenshire Council should be reminded that there is a requirement under the Public Records (Scotland) Act 2011 to keep their records management plan under review. It is possible that since the Information Management Operational Group was constituted in 2016 this has been done.</p> <p>If not, the Council should be made aware that failing to honour the original commitment to keep the agreed plan under review is a failure to comply with section 5(1) of the Act. This is a serious failing which could lead to the Keeper taking action.</p> <p>Section 7 of the Act gives the Keeper power to issue action notices “where he considers an authority ... has failed or is failing to comply with its records management plan.”</p> <p>For the moment this element remains at ‘Amber’.</p>	<p>Additional new evidence: Ev17 Information and Records Management Group Terms of Reference Ev18 Maturity Model assessment template</p>	
14. Shared Information	G	G	G	The Council is a partner in a high-level Memorandum of Understanding (MoU) which is currently being revised due to the superseding of Grampian Police by Police Scotland. The Keeper requests a copy of the updated MoU once it has been finalised.	<p>The council's information sharing practice has seen several changes.</p> <p>A full revision of this element has been conducted with accompanying evidence.</p>	<p>Since the Aberdeenshire Council's original submission in 2015 the data sharing processes have changed. This is not unexpected and the Assessment Team is happy to accept, at this stage, that the new system properly considers information governance issues when undertaking data sharing programmes.</p> <p>For example: the Assessment Team is familiar with the new Information Sharing Agreement (or Toolkit) and agrees it is a reasonable alternative to previous mechanisms, such as SASPI.</p> <p>The Assessment Team acknowledges that they have received a suite of information sharing guidance and template documents as evidence in support of this element. They will store these in order that the Council's submission can be kept up to date.</p>	<p>Since the comprehensive update in 2019, the only substantial change is the cessation of the Joint Working Information Sharing Group consisting of Aberdeenshire Council, NHS Grampian, Aberdeen City Council and Moray Council.</p> <p>A new group comprised of Data Protection Officers from these organisations will be meeting on a monthly basis.</p>	The Keeper's Assessment Team notes this update with thanks.

7. The Public Records (Scotland) Act Assessment Team's Summary

Version

The progress update submission which has been assessed is the one received by the Assessment Team on 8th March 2021. The progress update was submitted by Kate Bolsover, Information Governance Officer.

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

The Assessment Team has reviewed Aberdeenshire Council and Licensing Board's Progress Update submission and agrees that the proper record management arrangements outlined by the various elements in the authority's plan continue to be properly considered. The Assessment Team commends this authority's efforts to keep its Records Management Plan under review.

General Comments

Aberdeenshire Council and Licensing Board continue to take its records management obligations seriously and are working to bring all elements into full compliance.

Section 5(2) of the Public Records (Scotland) Act 2011 provides the Keeper of the Records of Scotland (the Keeper) with authority to revisit an agreed plan only after five years has elapsed since the date of agreement. Section 5(6) allows authorities to revise their agreed plan at any time and resubmit this for the Keeper's agreement. The Act does not require authorities to provide regular updates against progress. The Keeper, however, encourages such updates.

The Keeper cannot change the status of elements formally agreed under a voluntary submission, but he can use such submissions to indicate how he might now regard this status should the authority choose to resubmit its plan under section (5)(6) of the Act.

8. The Public Records (Scotland) Act Assessment Team's Evaluation

Based on the progress update assessment the Assessment Team considers that Aberdeenshire Council and Licensing Board continue to take their statutory obligations seriously and are working hard to bring all the elements of their records management arrangements into full compliance with the Act and fulfil the Keeper's expectations.

The Assessment Team recommends authorities consider publishing PUR assessment reports on their websites as an example of continued good practice both within individual authorities and across the sector.

This report follows the Public Records (Scotland) Act Assessment Team's review carried out by



Iida Saarinen
Public Records Support Officer