

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

**Fife Council and Licensing Board**

**Progress Update Review (PUR) Report by the PRSA Assessment Team**

**20<sup>th</sup> May 2022**

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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 Fife Council and Licensing Board. The outcome of the assessment and relevant feedback can be found under sections 6 – 8.

#### 4. Authority Background

Fife is Scotland's third largest local authority area by population. It has a resident population of just under 360,000, almost a third of whom live in the three principal towns of Dunfermline, Kirkcaldy and Glenrothes. Kirkcaldy is Fife's largest town by population (48,108 in 2006), followed by Dunfermline (45,462 in 2006) and then Glenrothes (38,927 in 2006). Fife Council is a unitary authority which provides all local government services for the Fife area. The Council Headquarters are located in Glenrothes. There are 78 councillors.

<http://www.fifecouncil.co.uk/index.cfm>

Licensing is the responsibility of licensing boards under powers contained in the Licensing (Scotland) Act 2005. Local licensing boards have wide discretion to determine appropriate licensing arrangements according to local needs and circumstances and their own legal advice. Each local government area must have a licensing board. Fife Licensing Board consists of 10 Board members.

#### 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:

<b>G</b>	The Assessment Team agrees this element of an authority's plan.	<b>A</b>	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.	<b>R</b>	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: Fife Council and Licensing Board

Element	Status under agreed Plan 25NOV14	Progress status 07JUN19	Progress status 20MAY22	Keeper's Report Comments on Authority's Plan 25NOV14	Self-assessment Update 28FEB19	Progress Review Comment 07JUN19	Self-assessment Updates as submitted by the Authority since 07JUN19	Progress Review Comment 20MAY22
1. Senior Officer	G	G	G	Update required on any change.	No change in nominated post or named individual.	No immediate action required. Update required on any future change.	<p><b>1.1 Overview</b></p> <p>The nominated post and named individual will change at RMP revision to Eileen Rowand, Executive Director, Finance and Corporate Services, who is Council SIRO.</p> <p>Meantime, provision remains nominally unchanged with the role and responsibilities delegated to the above. The resting of PRSA strategic-level responsibility with SIRO is set out in the Council IRM Strategy and Policy documents.</p> <p>Please see evidence documents: FCPUR21-02: Council IRM Strategy, 2021-23; FCPUR21-03 Council IRM Policy, 2021-23</p>	The Keeper's Assessment Team thank Fife Council and LB for this update which has been noted, alongside the evidence provided.
2. Records Manager	G	G	G	Update required on any change.	<p>Change in nominated post to that of Records Manager. The Records Manager reports to the Lead Officer, Security and Compliance.</p> <p>The Lead Officer, Security and Compliance, reports in turn to various management positions and boards, including the ICT Governance Board and to SIRO.</p> <p>The Records Manager also reports to the Information Governance Working Group (IGWG) which includes operational manager representation from across the Council.</p> <p>Change in named individual to Meic Pierce Owen- who is the Records Manager.</p>	The Assessment Team thanks Fife Council for this update which we have noted.	<p><b>2.1 Overview</b></p> <p>Provision remains as described in the 2018 year-end PUR and the July 2020 update.</p>	Update required on any change.
3. Policy	G	G	G	Update required on any change.	<p>The current version of both the Information Management Strategy and Records Management policy date from 2016 and are due for review in 2019 (see evidence documents FCPUR2018-01 and FCPUR2018-02).</p> <p>The rollout of MS SharePoint (SharePoint) continues in SP2013 (see evidence document FCPUR2018-03).</p>	<p>In their original submission Fife Council committed to updating relevant policy documents on a regular basis. The Assessment Team appreciates the confirmation that this is being done.</p> <p>The Assessment Team acknowledge the receipt of updated strategy/policy</p>	<p><b>3.1 Overview</b></p> <p>Provision continues to develop in line with that stated in the 2018 year-end PUR and July 2020 update</p> <p><b>3.2 Council IRM Strategy and Policy</b></p> <p>The scheduled review of the Council's IM Strategy and IRM Policy was completed with corporate sign-off coming in January 2021. These documents are date and approach aligned with the Council's Digital Strategy-which was signed off in the Autumn of 2020. The naming of these documents is now standardised to IRM Strategy and Policy.</p>	Thank you for this update on Information and Records Management Policy and Strategy work, including linking these to Digital Policy. The Assessment Team also acknowledges the receipt of these policy and Strategy documents with

					<p>Over the course of 2019, it is planned to migrate current SharePoint provision to MS Office 365 (Office 365). The Council will report further on this work in its February 2020 PUR.</p>	<p>documents which they have retained in order that they may keep the Fife Council submission up to date.</p> <p>The roll out of the SharePoint solution is bound to be incremental and further time must be allowed for it to bed in and become fully operational.</p> <p>The Assessment Team acknowledges the planned migration. They look forward to being kept updated on this work in subsequent PURs.</p>	<p>The linking of the IRM Strategy and Policy to the Digital Policy (which is a major corporate direction strategy document) is significant and is indicative of the benefits to PRSA delivery from the Records Manager being positioned within Business Technology Solutions (BTS)- the Council's IT Service. The Digital Strategy is the brainchild of Charlie Anderson, BTS Head of Service and the role of the Head of BTS as a sponsor and driver of PRSA delivery is flagged in the IRM Policy.</p> <p>Additional benefits of the Records Manager being positioned within BTS can be seen in the points below relating to Records Manager involvement in tech development. This involvement is accepted as part of the landscape rather than having to be sought (as has been the Records Manager's experience elsewhere).</p> <p>See evidence documents FCPUR21-01: Council Digital Strategy, 2020-23; FCPUR21-02: Council IRM Strategy, 2021-23; FCPUR21-03: Council IRM Policy, 2021-23</p> <p><b>3.3 PRSA Records Management Plan (RMP)</b> The proposed linked revision of the Council's Records Management Plan (RMP) that would have aligned with the IRM Strategy and Policy documents as (in part) a PRSA-mapped work delivery programme for the period was not, in the end, completed. This was because of the impact of the Pandemic on work programmes and the Keeper's decision to suspend the receipt of RMPs that are being revised on a voluntary basis.</p> <p>The decision was then taken in the Summer of 2021 to shelve the voluntary revision of the RMP until 2024 (unless requested by the Keeper in the meantime) and to align the Council's with the next iterations of the Digital Strategy, IRM Strategy and IRM Policy at that time.</p> <p>This decision was taken because of a/ the scale of a voluntary RMP revision being beyond Pandemic resource capacity and b/ with likely Keeper sign-off on a revised RMP not likely to be in place until 2022, this would require a further revision in around 18 months in order to maintain the required alignment with the IRM Strategy and Policy. This was felt to offer a poor return on required effort.</p> <p><b>3.2 IRM Delivery in the Services Programme (IRMDS)</b> (please see July 2020 update item 4.2)</p> <p>This is a new initiative relating to how the Council will deliver operational level IRM within the Business. It is founded on assigning defined and focussed roles and responsibilities within the business and on a concept called 'IRM light'. Roles and responsibilities are set on a/ the Information Asset Owner (IAO) as information and information risk</p>	<p>thanks. It sounds like the positioning of Records Management within BTS has been a productive move, resulting in a more streamlined suite of policies.</p> <p>Thank you also for the explanation on Fife Council and LB plans to prepare a voluntary resubmission of RMP, now pragmatically postponed. It seems a sensible and considered approach in present circumstances.</p> <p>We also appreciate the update on the IRMDS project and an overview of the planned 'IRM light' approach. We hope this approach helps Fife Council and LB to make sure core requirements are consistently being met in the long run,</p> <p>The receipt of then indicated IRMDS documentation is noted with thanks.</p> <p>We look forward to hearing how these projects progress in consecutive PURs.</p>
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						<p>owner in a defined business area (or for Directorate data within a major technology platform); b/ the Information Administrator (Info Admin) being responsible for operational delivery at team level and c/ the Information Handler (Info Handler) assisting the Info Admin in basic operations (such as box labelling or moving) as required.</p> <p>The concept of 'IRM light' is predicated on the recognition that staff time resource for IRM tasks is limited. From this acceptance, IRM light focusses of the defined core requirements of a/ delivering destruction as per the Council Records Retention Schedule (PRSA elements 4, 5, 6 and 7); b/ maintaining the Council Information Asset Register (PRSA Element 4) and c/ prompt exception reporting of any issues.</p> <p>The Programme gained overview approval in January 2020 and since that time it has been developed in detail.</p> <p>Please see evidence documents: FCPUR21-04 to FCPUR21-13 (IRMDS documentation and guidance)</p> <p>Planned launches across 2021 were delayed because of staff resource and corporate calendar issues.</p> <p>The launch is now scheduled for the first quarter of financial year 2022-23.</p>		
4. Business Classification	A	A	G	<p>The Business Classification Scheme (BCS) is currently being rolled out across the different service areas as part of a major redevelopment of records management systems based around the use of SharePoint 2013.</p> <p>The Keeper agrees this element on 'Improvement Model' terms. This means that he is convinced of the authority's commitment to implement the BCS fully over time, but would request that he is updated as this project progresses. Fife Council have suggested that they provide an update every 6 months to alert the Keeper to progress. The Keeper welcomes</p>	<p>Deployment of the BCS continues in the manner detailed as part of the Council's SharePoint Project (see evidence documents FCPUR2018-03 and FCPUR2018-04).</p> <p>This work is carried out under guidance from the Records Manager.</p> <p>In addition, the Council has developed its Information Asset Register (IAR) provision. (see element 10; see evidence document FCPUR2018-05). The IAR is in the process of being reviewed and developed further. The Council will report further on this work in its February 2020 PUR.</p> <p>This work is being carried out by the Records Manager.</p> <p>Responsibility for the management of the Council BCS and IAR now rest with the Records Manager.</p>	<p>The Assessment Team thanks Fife Council for an update on the Council's SharePoint project. The roll out of the SharePoint solution is bound to be incremental and further time must be allowed for it to bed in and become fully operational.</p> <p>This element remains at 'amber' for the moment as the work progresses.</p> <p>The Assessment Team commends the commitment of time and resources to this major improvement project. They look forward to being kept updated on this work in subsequent PURs.</p> <p>The Assessment Team thanks Fife Council for the update regarding the</p>	<p><b>4.1 Overview</b> Provision continues to develop in line with that stated in the 2018 year-end PUR and July 2020 update</p> <p><b>4.2 Business Classification Scheme (BCS)</b> The Council has a comprehensive BCS developed as part of the SharePoint Project (please see also 4.3- IAR) (evidence document previously submitted and acknowledged).</p> <p><b>4.3 Information Asset Register (IAR)</b> The Council has an IAR in place that dates from 2017. (evidence document previously submitted and acknowledged). This is to be revised and expanded as part of the IRMDS Programme. Once established, the IAR will be reviewed and refreshed annually. It is envisaged that it will inform information-risk based priority tech platform renewal as well as staff awareness of what data is where and what data they can legitimately access.</p> <p>Please see evidence documents: FCPUR21-11 to FCPUR21-13 (IAR Review documentation and guidance)</p> <p>Note: the IRMDS Programme (including the IAR Review) would have formed part of the work programme in the</p>	<p>Thank you for updating the Assessment Team on progress made regarding the Business Classification and information Asset Register frameworks. The receipt of supplied IAR Review documentation and guidance is noted with thanks.</p> <p>It is acknowledged that the SharePoint Project was a major undertaking, and it is great to hear this has now been completed. It sounds like Fife Council and LB have a solid grasp of the requirements connected to this</p>

				<p>this.</p>	<p>expanded role of the Records Manager (see element 2) which we have noted.</p> <p>The Assessment Team acknowledge the receipt of updated reports and examples of their Information Asset Register, and business classification documents. The Team have retained these in order that they may keep the Fife Council submission up to date.</p> <p>The Assessment Team acknowledges the planned Information Asset Register development. They look forward to being kept updated on this work in subsequent PURs.</p>	<p>proposed RMP covering that period.</p> <p><b>4.4 SharePoint Project update</b> (please see also 5.3- SP retention) The Council SharePoint Project is now substantively complete. The Project has created a Council-wide EDMS environment of retention-controlled SharePoint libraries arranged by document type within a BCS structure. Sitting within the Council's wider O365, this configuration provides the Council with a 'put it there' system for Council staff to either simply create and work on documents within the appropriate SharePoint Library or move them there when they are completed.</p>	<p>major project, and that supporting Business Classification framework documentation has been properly considered, reviewed and delivered, including guidance documentation for staff to follow.</p> <p>This PUR Element has now been turned from Amber to Green to celebrate the significant leaps, in SharePoint implementation and the associated BCS and IAR frameworks, made in the last couple of years. If this was a formal resubmission, this Element might well turn Green in the formal assessment of Council's RMP.</p>	
5. Retention Schedule	A	A	A	<p>The retention schedule is being revised at time of submission using the well regarded SCARRS system. The Keeper commends the functional approach being adopted in the new system.</p> <p>The retention schedule will be imposed on the shared drives as the SharePoint solution is rolled out through the authority.</p> <p>The Keeper agrees this element on 'Improvement Model' terms. This means that he is convinced of the authority's commitment to implement the revised Retention Schedule fully over time, but would request</p>	<p>Deployment of the Council Records Retention Schedule (retention schedule) continues in the manner detailed as part of the Council's SharePoint Project (see evidence documents FCPUR2018-03 and FCPUR2018-06).</p> <p>This work is carried out under guidance from the Records Manager.</p> <p>As SharePoint is being deployed, records stored on the network drives (drives) are being migrated into SharePoint ahead of the decommissioning of these drives. As part of the migration process, records are surveyed and, where records are found to be out of retention, they are reviewed for on-going live business value ahead of full disposition being carried out.</p> <p>A change in retention practice currently being introduced is to look to select for permanent preservation those strategy, policy and procedure</p>	<p>The Assessment Team acknowledge the receipt of updated retention schedule. The Team have retained these in order that they may keep the Fife Council submission up to date.</p> <p>The Assessment Team thank Fife Council for the update regarding using the SharePoint project (see element 4) as a prompt to revisit previous retention decisions. This is a recognition that a Retention Schedule is a 'living document' as does the consideration of permanent retention decisions in light of lessons learned by the child abuse and other enquiries. This is to be commended.</p>	<p><b>5.1 Overview</b> Provision continues to develop in line with that stated in the 2018 year-end PUR and July 2020 update.</p> <p><b>5.2 The Council Records Retention Schedule</b> (retention schedule) As stated in the RMP, the Retention Schedule is SCARRS. The review of those record types that are stored within SP is now substantively complete (evidence previously submitted and acknowledged). Over 2022-2024, the Records Manager will engage with the Business to expand this review to include document types not stored within SP.</p> <p>Note: this Project was originally to be scheduled 2021-23 and would have formed part of the work programme in the proposed RMP covering that period.</p> <p>This process will see the creation of a single unified Retention Schedule that will then be posted on the Council's website. Currently, retention schedule outwith those record types stored within SP is a mix of SCARRS and stand-alone Retention Schedules generated since the adoption of SCARRS in 2014. This provision includes a number of updated Retention Schedules prepared as outlined in the update of July 2020. These projects are a mix of routine</p>	<p>Thank you for this update on the Council's Records Retention Schedule (the continuing use of SCARRS).</p> <p>It is very welcome news that the review of record types stored on SharePoint is now complete, and that a review of other document types will follow in the next couple of years. It appears that the Council has a solid plan to improve its retention procedures through a unified Retention Schedule, and the Assessment Team would like to encourage this</p>



				<p>that he is updated as this project progresses. Fife Council has suggested that they provide an update every 6 months to alert the Keeper to progress. The Keeper welcomes this.</p>	<p>documents – and in particular those relating to sensitive service areas. This is taking on board the learning from the Scottish Child Abuse Inquiry (SCAI) and similar inquiries elsewhere of the need for the Council to be able to evidence ‘why something was done when it was done.’</p> <p>Responsibility for the management of the Council Records retention Schedule now rests with the Records Manager.</p>	<p>This element remains at ‘amber’ for the moment as the SharePoint project and shared drive decommissioning progresses. They look forward to being kept updated on this work in subsequent PURs.</p>	<p>housekeeping and projects that seek to address specific issues not resolved by SCARRS.</p> <p>Please see evidence document FCPUR21-14: HR Disciplinary records retention proposals paper. Please note that this report is under consideration at date of submission.</p> <p><b>5.3 SharePoint retention</b> As outlined above (please see also 4.4- SP Project), the SP project is now substantively complete and the operation of SP is moving into BAU. Part of BAU will include both maintaining and developing retention provision within SP. The Records Manager will be involved in this at all times in their capacity as manager of the Retention Schedule.</p> <p>One thing that is being done in this regard is to procure a stand-alone back-up platform for O365. This is being done in part for Information Security compliance reasons and also to assist in automated retention bedding-in as accepted and understood practice within the Council. The concern here is that business-based best practice retention periods may take a time to reach what they should be with documents initially cycling out of the system ahead of the end of the time of their legitimate business need.</p> <p>Note: this provision is in live discussion at time of submission.</p> <p><b>5.4 Retention in the wider Council MS Office365 (O365)</b> Within the wider O365, the Council has set retention to 2 years in both Teams and OneDrive. This has been suspended over the term of the Pandemic but is to be introduced over the coming time. The purpose of this is to ensure that these areas do not become log-term storage areas with no retention control. To ensure onward retention of documents, staff will simply move completed documents to the appropriate SP library. This practice has already been adopted by a number of work teams and individuals.</p> <p>In addition, retention has been considered for other O365 apps. Of particular note here is the recording of video.</p> <p>Please see evidence documents FCPUR21-15: recording meetings technical overview &amp; overarching DPIA; FCPUR21-16: staff guidance note on considerations when thinking about recording a meeting.</p> <p><b>5.5 Technical Specification Document</b> This is a new development that has relevance across a number of PRSA elements. However, one of its primary benefits is in the area of records retention so it is included here.</p> <p>The Technical Specification Document (tech spec) is an early-stage assessment tool for use in the purchase/</p>	<p>approach.</p> <p>The receipt of evidence provided is noted with many thanks.</p> <p>The planned procurement of a standalone back-up platform for O365 is also acknowledged. It is clear that Fife Council has carefully considered the various implications of O365 suite implementation. The TechSpec approach also sounds like a positive step. All of the evidence attached is received with thanks.</p> <p>It is clear that significant progress has been made with regard to this Element. While the unified Records Retention Schedule is in development, it will remain at Amber. Fife Council and LB have made encouraging progress, however, and are close achieving to Green RAG status.</p> <p>We look forward to hearing on how these projects progress in consecutive PURs.</p>
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						<p>procurement of new technology solutions for the Council.</p> <p>Its purpose is to map solution technical capability and compatibility with the Council network and, where there are issues, spark discussion and resolution of those issues and risks.</p> <p>There has been a document of this type focussed on purely IT technical matters for a number of years. However, the revised document has both slimmed down the IT Technical asks and includes IG capabilities. From a PRSA pov, these include both retention (element 5) and destruction (element 6) as well as export to specified destination (element), IS and DP (elements 8 and 9) and audit trail (element 11).</p> <p>The Records Manager is a member of the Working Group that has managed, and continues to manage, the development of the Tech Spec.</p> <p>Please see evidence documents FCPUR21-18: tech spec form; FCPUR21-19: tech spec work instruction.</p>		
6. Destruction Arrangements	G	G	G	Update required on any change.	<p>Arrangements for the destruction of paper and electronic records remain unchanged.</p> <p>The Council's use of RecordPoint is currently under review. The outcome of this review will an onward solution for the management of paper and electronic records disposition in Office 365. The Council will report further on this work in its February 2020 PUR.</p> <p>Paper records storage arrangements have developed with the opening (in 2017) of Council internal semi-current record and archive record stores in the Council's Bankhead facility (Bankhead). These comprise full archive provision (see below, element 7) together with a semi-current 'archive' store for Council Records in general and a dedicated semi-current and permanent preservation store for social care records. Each of these stores is operated by distinct dedicated teams (see element 8 and element 12).</p> <p>In 2017, the Project Team responsible for the development of this in-house records storage solution received the IRMS Team of the Year Award.</p> <p>The Council is currently developing a</p>	<p>No immediate action required. Update required on any future change.</p> <p>The Keeper acknowledges the statement regarding the Scottish Child Abuse Enquiry. Furthermore he accepts that this, temporarily, takes precedence over implementing retention decisions.</p> <p>The Assessment Team thank Fife Council for the information regarding the Bankhead record store. The Team were pleased to be given access to this facility recently and agree that it is entirely suitable for the purposes explained.</p> <p>The Assessment Team thank Fife Council for the information about their scanning project and they look forward to being kept updated on this programme in subsequent PURs. They acknowledge they have received a copy of the <i>Document</i></p>	<p><b>6.1 Overview</b> Provision for the destruction of paper and electronic records remains as stated in the 2018 year-end PUR and July 2020 update.</p> <p><b>6.2 RecordPoint tech replacement.</b> The development of an in-house replacement for RecordPoint as an in-house paper records box management system is in its final stages.</p> <p>This will manage not only retention-controlled box destruction (element 6) but will also operate first-line issue and return controls for boxes of documents loaned from the Store (element 12).</p> <p>The Records Manager has been involved in the development of both this replacement solution and the review of related procedures.</p> <p><b>6.3 Scanning of paper records</b> The Council back-scanning and scanning of documents programme continues and has been expanded in consequence of the Pandemic.</p> <p>The Records Manager has been involved in developing QA-test based destruction of back-scanned paper original documents and the 90-day retention of office-scanned incoming documents. These provisions are typically developed via DPIA documentation.</p> <p>Please see evidence document FCPUR21-staff guidance on scanning.</p>	<p>The Assessment Team is grateful for this update on Records Destruction arrangements, including RecordPoint tech replacement, continuing back-scanning and scanning of paper documents, and the best practice approach of obtaining and retaining records destruction certificates.</p> <p>It is positive to see that this Element continues to be properly addressed, including staff training. The evidence provided here is noted with thanks.</p> <p>Based on this update, the Assessment Team have no specific concerns. This element will remain at Green.</p>

				<p>programme for the back-scanning of current and semi-current paper records along with the introduction of electronic mailroom and the routine scanning of incoming paper records (please see evidence document FCPUR2018-07). It is planned that all scanning will be to permanent preservation-compatible PDF/A format. The Records Manager is involved in this work.</p> <p>It is planned that paper original records will be destroyed after being scanned and after an appropriate period has elapsed and appropriate checking of the scanned records has taken place. Within this framework, it is planned to include provision for the preservation of paper documents of enduring evidential value. Examples of these would be Social Care file personal documents defined as 'cherished items'. Such items might include letters from family members or photographs. In looking to do this, the Council is conscious of the learning coming out of SCAI and other such Inquiries elsewhere with regards the sensitive treatment of records relating to an individual's 'journey'.</p> <p>The Council will report further on this work in its February 2020 PUR.</p>	<p><i>Management-Scanning Positional Paper</i> in evidence.</p>	<p><b>6.4 Destruction certificates</b> Destruction certificates are required to be completed for paper records being destroyed and electronic records being manually destroyed.</p> <p>Where a technology platform carries out automated destruction, the ability to produce destruction reports is sought by the Council. This is looked-at as part of both the Tech Spec and DPIA processes.</p> <p>Please see evidence documents FCPUR21-20: paper records destruction form; FCPUR21-21: electronic records destruction form; FCPUR21-22: Staff guidance on document destruction</p>	
7. Archiving and Transfer	G	G	G	<p>Update required on any change.</p> <p>Arrangements for the appraisal, selection, transfer and onward archival management of records remain substantively unchanged.</p> <p>Changes have taken place in:</p> <p>1/ roles and responsibilities with responsibility for managing and promoting appraisal and selection now resting jointly with the Archives and Local Studies Team Leader (the Archivist) and the Records Manager. This joint responsibility, which is currently an agreed arrangement between the named individuals, will be formally set out in the revised Council Records Management Policy (see element 3.)</p> <p>2/ the location of the Council Archive which, in 2016, moved into a new dedicated facility in Bankhead.</p>	<p>No immediate action required. Update required on any future change.</p> <p>However, the Assessment Team notes the consideration of the permanent retention of 'paper documents of enduring evidential value', including 'cherished items', described in element 6 above. This is to be commended (particularly in light of the background to the Act)</p> <p>The Assessment Team thank Fife Council for the information regarding the Bankhead archive. The Team were pleased to be given access to this facility recently and agree</p>	<p><b>7.1 Overview</b> Provision remains as described in the 2018 year-end PUR and the July 2020 update.</p> <p><b>7.2 Novell Network Drives (Novell) decommissioning</b> The proposed actions by Records Manager and Archivist as outlined in the July 2020 update were in the end unrequired. Decommissioning of Novell is being completed with all content either migrated to SharePoint or deleted. The Council Records Retention has been taken not account in assessing content for migration. This, along with the amount of data destroyed will be noted in an end of decommissioning report.</p> <p><b>7.3 Digital Preservation</b> It is planned to look at the Council's requirements in this area. This work will be led by the Records Manager and will involve the Archivist. This work would have formed part of the Work Programme in the proposed revised RMP. The precise scheduling of this work has not at this point been finalised.</p>	<p>The Assessment Team thanks you for this update on Archiving and Transfer arrangements. Thank you, in particular, for the update on the arrangements for the decommissioning of Network Drives and on digital preservation.</p> <p>This Element remains at Green.</p>

						that it is entirely suitable for the purposes explained.		
8. Information Security	G	G	G	Update required on any change.	<p>Current provision is summarised in evidence document FCPUR2018-08 with further detail provided in evidence documents FCPUR2018-09 to FCPUR2018-13.</p> <p>Provision is managed by a dedicated Information Security Team (2 individuals) working under the Lead Officer, Security and Compliance.</p> <p>The Records Manager is involved in this work as part of a coordinated approach to Information Governance (IG) provision.</p>	<p>An <i>Overview Report</i> regarding information security, from the Council's Information Security Specialists, has been supplied to the Assessment Team. This provides an update on latest developments and the Team thank Fife Council for supplying this. They have retained this in order that they may keep the Fife Council submission up to date.</p> <p>The Assessment Team also acknowledge receipt of a new version of the <i>Information Security Policy</i> (v7.2) and other information security guidance and policy documents. In their original submission Fife Council committed to updating relevant policy documents on a regular basis. The Assessment Team appreciates the confirmation that this is being done.</p>	<p><b>8.1 Overview</b> Provision remains as described in the 2018 year-end PUR and the July 2020 update.</p> <p>Please see evidence documents: FCPUR21-23: Council IS Policy; FCPUR21-24: Council IS incident management policy; FCPUR21-25: IS PUR 2021 year-end summary; FCPUR21-26: Logj4 CREW notice vulnerability response December 2021; FCPUR21-27: Protect and Assure Q3 2021-22 Report (includes reference to Logj4 CREW notice as above).</p> <p>Note: item 8.2 from the July 2020 update is now discussed at item 12.3</p>	Thank you for the comprehensive evidence suite provided in support of this Element. The Assessment Team look forward to being updated on any change in consecutive PURs.
9. Data Protection	G	G	G	Update required on any change.	<p>Current provision is summarised in evidence document FCPUR2018-14. This document includes a link to relevant policy documentation.</p> <p>Provision is managed by a dedicated data Protection Team (2 members) working under the Council Data Protection Officer (DPO)- which is a dedicated post.</p> <p>The Records Manager is involved in this work as part of a coordinated approach to IG provision.</p>	<p>As with all other Scottish public authorities Fife Council have been required to review and update their data protection procedures in light of the 2018 legislation.</p> <p>The Assessment Team acknowledges that the public facing Fife Council website has been updated appropriately:</p> <p><a href="https://www.fifedirect.org.uk/topics/index.cfm?fuseaction=service.display&amp;p2s_id=27029554-BBE9-4F59-9F50-BDD9545062E7">https://www.fifedirect.org.uk/topics/index.cfm?fuseaction=service.display&amp;p2s_id=27029554-BBE9-4F59-9F50-BDD9545062E7</a></p>	<p><b>9.1 Overview</b> Provision remains as described in the 2018 year-end PUR and the July 2020 update.</p> <p>Please see evidence documents FCPUR21-28: Council DP Policy; FCPUR21-29: Data Handling Policy; FCPUR21-30: DP PUR year-end summary; FCPUR21-31: FC Community Booking solution DPIA; FCPUR21-32: Putting people first privacy notice.</p> <p>Note: at date of submission, the Council was in the process of recruiting a new DPO, the previous post-holder having moved to a new role elsewhere. In the interim, the remaining two members of the DP Team (who are both professionally qualified) remain in post.</p>	Thank you for this update, the evidence suite provided, as well as the update on Data Protection Officer recruitment. The Assessment Team have no concerns over this Element and look forward to updates in consecutive PURs.

						The Assessment Team also acknowledge receipt of a <i>Summary Report</i> of the Data Protection provision in Fife Council from the Council's DPO Fiona Stuart. This provides an update on latest developments and the Team thank Fife Council for supplying this. They have retained this in order that they may keep the Fife Council submission up to date.		
10. Business Continuity and Vital Records	G	G	G	Update required on any change.	No change in arrangements.  The Records Manager is in contact with the relevant officers.	No immediate action required. Update required on any future change.	<b>10.1 Overview</b> Provision remains as described in the 2018 year-end PUR and the July 2020 update.  Please see evidence document FCPUR21-33: Emergency Resilience Manager overview.	Thank you for this update on business continuity and vital records, as well as the Emergency Resilience overview document. Update is required on any change.
11. Audit Trail	A	A	A	The roll-out of SharePoint will greatly enhance audit function relating to electronic records whilst the creation of a centralised records store in a new repository will help in the tracking of paper records. The Keeper commends these initiatives and requests updates on these developments.  The Keeper agrees this element on 'Improvement Model' terms. This means that he is convinced of the authority's commitment to implement systems to track and identify records fully over time, but would request that he is updated as this project progresses.	Where SharePoint has been adopted, enhanced audit function relating to electronic records is in place.  In addition, audit trail provision is now assessed as part of the Data Protection Impact Assessment (DPIA) process relating to the provision of IT systems and IT Cloud Services (tech provision) that process personal data. A number of such DPIA documents have been prepared as part of contracts that are yet to be fully signed off. As such, the documents are viewed as draft at this time. The Council will report further on this work in its February 2020 PUR.  Over the coming year, it is hoped to integrate audit trail requirements into the Council's procurement process for all tech provision. The Council will report further on this work in its February 2020 PUR.  Turning to paper audit trail provision, enhanced provision is being introduced within the Council's Social Care Services. The Council will report further on this work in its February 2020 PUR.	Audit Trail/document tracking is improving in Fife Council in several areas detailed in the previous column. The Keeper thanks the Council for the update on progress.  As previously stated the roll-out of the SharePoint solution will enhance the tracking of digital records and the Assessment Team acknowledges that this roll-out is progressing satisfactorily (see element 4). They look forward to being kept updated on this programme in subsequent PURs.  Similarly, they look forward to an update on the processes being put in place for creating an audit trail for paper records and note that the pilot Social Care has progressed well.  This element remains at 'amber' for the moment as the work progresses.	<b>11.1 Overview</b> Audit trail provision within the Council remains strong for paper records and in a developing state for electronic records.  <b>11.2 Paper Records Document issue and return</b> Guidance is in place and good practice is in existence across the Council. This provision has performed well over the Pandemic.  In addition, the replacement tech for RecordPoint (please see 6.2 above) will offer strong audit trail on record boxes.  Please see evidence document FCPUR21-34: staff guidance on the control of paper records.  <b>11.3 Electronic Records</b> Audit trail provision for electronic records is mixed and is dependent on technology platform capability. The requirement for audit trail provision is included within both the tech spec (see 5.5 above) and DPIA (see 9.1 above) processes.	The Assessment Team is grateful for this update on Audit Trail arrangements. It is good to hear that arrangements concerning analogue records continue to be strong. The evidence provided is noted with thanks.  With regard to electronic records, it is understandable that the more straightforward, single-platform solution will take time to bed-in properly.  This Element will remain at Amber while the process on electronic record audit trails is being perfected.

12. Competency Framework	G	G	G	Update required on any change.	<p>In terms of the competency framework for the Records Manager, the Council recruited the current Records Manager in 2017 with the requirement of a post requirement of either a recognised post-graduate qualification and/or professional accreditation.</p> <p>The current post-holder holds both such a qualification and professional accreditation.</p> <p>Looking wider, the Council is currently developing a co-ordinated approach to Records Management Training.</p> <p>Forming part of an integrated programme of IG training designed to give staff the skills needed to work with information, this will be a tiered approach similar to that adopted in Data Protection. The purpose of this training will be to match IG training requirements to the level of information-related work being undertaken by staff.</p> <p>Under this framework, it is envisaged that there will be three levels of training required- each of which will have its own competency framework.</p> <p>Detail of this provision are in development but it is likely to have three levels operating along the lines of</p> <ol style="list-style-type: none"> <li>1. General- applying to all staff</li> <li>2. Enhanced- applying to roles with specific records management responsibilities</li> <li>3. Professional- applying to roles requiring profession-level records management skills.</li> </ol> <p>The Council will report further on this work in its February 2020 PUR.</p>	<p>The Assessment Team notes that Fife Council employs a full-time, highly qualified records manager. The PUR makes it clear that this individual has input to all elements of the Records Management Plan. The Council's approach to this issue is to be commended.</p> <p>Similarly the resources allocated to information governance training for all relevant staff seem to be improving. Although the 'co-ordinated approach to records management training' is still in development the Assessment Team regards this as a positive step and looks forward to an update on this in subsequent PURs.</p> <p>If this were a formal submission the Keeper would request sight of samples of this training as evidence.</p>	<p><b>12.1 Overview</b> Provision continues to develop in line with that stated in the 2018 year-end PUR and July 2020 update</p> <p><b>21.2 Professional Records Manager</b> The Council currently employees two professionally qualified and experienced Records Managers. These are Meic Pierce Owen, the Council Records Manager and Lesley Gauld, Manager (Compliance) Health and Social Care Partnership Localities</p> <p>Relevant competency frameworks are in place for each post. Each current postholder was appointed under these frameworks.</p> <p>In terms of CPD, each post-holder is given reasonable access to CPD opportunities within budget constraints.</p> <p><b>21.3 Staff Competency</b> Whilst no formal IRM competency frameworks exist for staff in general, post competencies for posts involving information appear appropriate for the posts.</p> <p>Looking at the plans outlined in both the 2018 year-end PUR and the July 2020 update for tiered IRM training have not substantively progressed. However, a suitable 'off-the shelf' IRM awareness training module for all staff has been identified within the Council's Oracle Cloud platform. It is planned to add a multi-choice questionnaire to this Module and introduce it as part of the Council's all-staff training programme.</p> <p>Meantime, staff guidance has been prepared on a number of topics and pages have been published on the Council's new Intranet. These are gaining a small but positive response.</p> <p>There have also been IRM messages included within all staff updates issued over the course of the Pandemic. As noted in 8.2 in the July 2020 update, these have very much been about 'please do this' rather than 'do not do that'. The same approach has been taken to IRM guidance issued to staff around the Council's current round of Estate reduction. Finally, a small number of 'talking head' recorded PowerPoint presentations have been made as learning aids for the IRMDS Programme. It is planned to us this technique for more general staff awareness and guidance topics.</p> <p>Please see evidence documents FCPUR21-35 to FCPUR21-40: IRM intranet pages;</p>	<p>The Assessment Team thanks Fife Council and Fife Licensing Board for this update on staff competencies around records management. It is clear that compliance in this element continues through the employment of professional records managers, but also through staff training. This will have been particularly important during the pandemic due to remote working arrangements.</p> <p>The evidence provided on this Element is noted with thanks. The Team is contented to keep it at Green, with updates required on any change.</p>
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							FCPUR21-16, FCPUR21-19, FCPUR21-22, FCPUR21-34: staff guidance notes;  FCPUR21-09, FCPUR21-10, FCPUR21-13: IRMDS programme 'talking head' PowerPoint presentation recordings.	
13. Assessment and Review	G	G	G	<p>The authority will review the RMP annually with a major review every three years. The Keeper commends this approach and would welcome updates on the findings of any reviews or internal audits.</p>	<p>In April 2016, the Council submitted a formal update report to the Keeper (see evidence documents FCPUR2018-15 and FCPUR2018-16).</p> <p>Since May 2017, and in anticipation of engaging in the annual PUR process, the Keeper has been regularly updated verbally on progress.</p> <p>The Council is engaged in the annual PRSA PUR reporting process.</p> <p>Over the coming year, it is planned to review the current Council RMP following the conclusion of the current PUR process. and taking on board the Keeper's comments arising from this process. It is also planned that this review will take place after the publication of the forthcoming revisions to the Keeper's Model Plan guidance.</p> <p>It is envisaged that this review will lead to the production and submission of a revised RMP. It is planned that this revised RMP will be formatted to reflect a strategic 'outcomes' framework with 'actions over the coming year' and a 'review of progress over the past year' being recorded and reported to the Keeper via the annual PUR Report. It is planned that the revised RMP includes the proposed 'Element 15-third party compliance.'</p> <p>It is envisaged that the revised RMP will be developed and submitted to the Keeper over the course of 2019.</p>	<p>Fife Council have been exemplary in keeping the Keeper informed of progress in the implementation of their agreed plan and of information governance developments in the Council. This engagement to be highly commended.</p> <p>The completion of this Progress Update Review can also be considered as evidence of the commitment to review committed to in the original submission.</p> <p>The Keeper notes the Council is considering re-submitting formally under section 5 of the Act. This is welcomed. However, it would be worth contacting the Assessment Team in advance to discuss what is required of an authority who chooses to do this. (The Assessment Team will also be happy to put Fife Council's Records Manager in touch with his opposite number in another local authority who has already been through the voluntary re-submission process).</p>	<p><b>13.1 Overview</b> Provision remains as described in the 2018 year-end PUR and the July 2020 update.</p> <p>Note: In July 2020, at the request of the Council and because of personal Records Manager circumstances in January/February 2020 and subsequent Pandemic work pressures, the Keeper kindly agreed to accept and update statement in place of the planned year-end PUR for 2019. No year-end PUR for 2020 was undertaken.</p> <p>Please see evidence documents: FCPUR21-27 &amp; FCPUR21-41: Q3 2021-22 IG and IS reporting.</p> <p><b>13.2 RMP: annual and three-year review</b> IRM activities, as they relate to PRSA delivery, are reviewed across the Year each year. The plan to fully-review the RMP at three-year intervals (or to align with the term of the Digital Strategy and IRM Strategy and Policy if the current three-year term of those changes) will commence from 2024 (unless the Keeper requests a revision of the RMP ahead of that date).</p> <p>The comments of the Keeper that the Assessment Team should be engaged with before commencing a revision of the RMP have been taken on board and such engagement took place in 2020 ahead of the Keeper placing a hold on voluntary submissions of revised RMPs.</p>	<p>This Element remains on a strong footing, and Fife Council are commendably engaging with the PRSA Team on records management matters – including regular participation in the PUR process.</p> <p>The evidence provided is also noted with thanks.</p> <p>The plan to fully review the RMP every three years is a particularly praiseworthy one, and the Team encourage the planned voluntary submission in 2024. We look forward to hearing about progress on the various projects in the next PUR.</p>
14. Shared Information	G	G	G	<p>Update required on any change.</p>	<p>Development of provision has continued in accordance with that set out in the RMP.</p> <p>The Council's Information Sharing Protocol (ISP) provision is extensive. This provision includes strongly developed provision across the Fife</p>	<p>The Assessment Team thanks Fife Council for this update.</p> <p>The Assessment Team acknowledge the receipt of a copy of the <i>Information Sharing</i></p>	<p><b>14.1 Overview</b> Development of provision continues as set out in the 2018 year-end PUR and the July 2020 update.</p> <p>Please see evidence document FCPUR21-42 Council data sharing guidance.</p>	<p>The Assessment Team thank you for this update, and acknowledge the receipt of Fife Council's Data Sharing Guidance.</p>

					<p>Health and Social Care Partnership (see evidence document FCPUR2018-17).</p> <p>This provision is managed by the Council DPO (see element 9). The Records Manager is involved in this work as is appropriate.</p> <p>Over the coming year, the Council will be further strengthening its ISP provision and looking at the information sharing opportunities offered, and challenges posed, by the move to Office 365. The Council will report further on this work in its February 2020 PUR.</p>	<p><i>Agreement</i> between Fife Council, NHS Fife and the Fife Integration Joint Board dated March 2018. The Team agree this properly considers information governance issues when the Council engages in data sharing with its partner bodies under this mechanism.</p> <p>The Assessment Team have stored their copy of the <i>Information Sharing Agreement</i> in order that they may keep the Fife Council submission up to date.</p> <p>As with other elements above, the Assessment Team looks forward to updates on the SharePoint/365 project in subsequent PURs. This would, of course, include any updates on data sharing provision.</p>		Update required on any change.
15. Third-Party Compliance	N/A	N/A	N/A	n/a	n/a	N/a	<p><b>15.1 Overview</b> Provision in this area is not explicitly included in current PUR process as the RMP (2014) pre-dates the introduction of element 15 (2018-19). It is, however, included by the Council on a voluntary basis ahead of the submission of a revised RMP</p> <p><b>15.2 Tender and contract inclusion</b> The Council is making progress in including PRSA requirements within both tendering documentation and also within annual amendments to existing contracts.</p> <p>Please see evidence document FCPUR21-44 draft Occupational Health solution tender document (includes Records Management and Transfer section, p.17)</p>	<p>The Assessment Team thank you for including an update on Element 15. The sample tender document is received with thanks, and shows that Fife Council continues to take its public records management responsibilities seriously, including when outsourcing its functions.</p> <p>This Element will not get a RAG status in the PURs, but we encourage Fife Council to Include it in the revised RMP for proper assessment as intended.</p>



## 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 4 March 2022. The progress update was submitted by Meic Pierce Owen, Council Records Manager.

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

The Assessment Team has reviewed Fife 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

Fife Council and Licensing Board continues to take its records management obligations seriously and is 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 Fife 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