

The Public Records (Scotland) Act 2011

Perth and Kinross Council and Licensing Board

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

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

4. Authority Background

Perth and Kinross is one of the 32 council areas of Scotland and a Lieutenancy Area. It borders onto the Aberdeenshire, Angus, Argyll and Bute, Clackmannanshire, Dundee, Fife, Highland and the Stirling council areas. Perth is the administrative centre. It corresponds broadly, but not exactly, with the former counties of Perthshire and Kinross-shire.

Perthshire and Kinross-shire had a joint county council from 1929 until 1975. The area was created a single district in 1975, in the Tayside region, under the Local Government (Scotland) Act 1973, and then reconstituted as a unitary authority (with a minor boundary adjustment) in 1996, by the Local Government etc. (Scotland) Act 1994.

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. Perth and Kinross 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:

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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Progress Update Review (PUR) Template: Perth and Kinross Council and Perth and Kinross Licensing Board

Element	Status of elements under agreed Plan 17JUL15	Status of evidence under agreed Plan 17JUL15	Progress assessment status 25JAN2022	Keeper's Report Comments on Authority's Plan, 17JUL15	Self-assessment Update as submitted by the Authority since 17JUL15	Progress Review Comment 25JAN2022
1. Senior Officer	G	G	G	Update required on any change.	No Change – Head of Legal and Governance Lisa Simpson is the designated Senior Information Risk Owner (SIRO)	Noted with thanks. Update required on any future change.
2. Records Manager	G	G	G	Update required on any change.	Change in Personnel - A new Records and Information Security Manager Khopolo Jamangile was appointed in Aug 21. Records and Information Security Management are now operating as a combined role.	The Keeper's Assessment Team thank the authority for updating us on changes to this element. Update required on any future change.
3. Policy	G	G	G	Update required on any change.	The Council's Records Management Plan (RMP) has not changed: We recognise an updated RMP will be required; this is planned for 2022/23, when all live or current records will have been migrated from shared drives to an Electronic Document Management System on M365.	Noted with thanks. It is positive that the authority are looking towards the resubmission of their RMP, and taking into account the changes that the implementation of M365 may have on

						their records management.
4. Business Classification	A	A	A	<p>No evidence has been submitted detailing the current level of provision in PKC. The RMP states that 'There is currently no corporate approach to file classification'.</p> <p>The development of PKC's Business Classification Scheme (BCS) is closely tied into plans to implement an Electronic Document Management System (EDMS). As part of this, PKC intends to adopt the Local Government Classification Scheme (LGCS) to structure its files as part of the move to an EDMS. The timetable detailing the steps involved in this project is set out in the RMP, with the corporate-wide roll-out of the EDMS planned for the end of 2016.</p> <p>Aligned with the project to develop and implement the BCS and EDMS is the need to develop guidance and training for staff in the use of these. The RMP also details the timescales for producing this.</p> <p>The roles and responsibilities for this project are set out in the RMP. The records manager will work with teams in the different business areas to develop their file plans so that these can be incorporated into a corporate file plan based on the LGCS. The Keeper commends the approach of working with colleagues to develop a BCS as this will hopefully engender 'buy-in' from business</p>	<p>EDMS has been implemented in line with the Local Government Classification Scheme (LGCS). The EDMS has been built gradually and configured for the effective management of document retention, based on what functions business units or teams perform and thereby producing a file plan which is a living document. This will evolve and change as and when team functions change.</p> <p>The EDMS has taken a considerable amount of time to implement due to technological changes within the wider market. The delays and changes have enabled Perth and Kinross Council (PKC) to implement an EDMS solution using the latest iteration of M365. This will make it easier for the EDMS to evolve with technology and incorporate records management features as they become available on M365. Plans are in place to make further improvements to this environment by implementing sensitivity labels in conjunction with the already-inherited label policies. This will</p>	<p>The Team note that the authority have now implemented their EDMS in line with the Local Government Classification Scheme. It is positive that Perth and Kinross Council (PKC) have designed the EDMS to adapt and evolve to their changing business needs and team functions.</p> <p>Like many authorities across Scotland, (PKC) have chosen to utilise M365 as a RM solution. As noted by the authority, this will allow PKC to implement their EDMS with M365's integrated RM features. Migration to M365 is likely to take some time to properly "bed-in" and the Assessment Team would be interested to hear about progress in</p>

				<p>areas.</p> <p>The Keeper can agree this element on an 'improvement model' basis provided he is kept up-to-date on the progress of the EDMS and BCS implementation project. The Keeper is convinced that there is a commitment to close the gap in provision in this area.</p>	<p>enable PKC to include further classification features within the solution, such as marking items as confidential and enabling security and records management restrictions on items labelled in this manner.</p> <p>All live or current records which previously resided in shared, unstructured drives are being migrated to the EDMS. The migration project is due to be completed in March 2022. The Records Management team, working with colleagues in Services and IT, are planning to review the drives once migration is complete, with a view to migrating any remaining records which are within their retention periods and classifying these under the same headings as on EDMS sites.</p> <p>Naming conventions which are used within the organisation are in the process of being revised. The search functionality available within the platform used for EDMS, as well as its functional organisation, will influence guidance on naming conventions.</p>	<p>future PURs.</p> <p>The Assessment Team welcome news that the authority are developing their existing label policies to further include sensitivity classifications. This is an important consideration, and one which will help PKC ensure that information is managed and accessed appropriately.</p> <p>The authority aims to migrate their live and current records from shared drives to the EDMS by March 2022. This is a positive step and the Assessment Team are pleased to hear that the Records Management Team are carrying out the project with the collaboration of colleagues from Services and IT. The Team would be</p>
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	A	A	A			<p>interested to hear of progress in subsequent PURs.</p> <p>PKC note that they are in the process of revising their naming conventions. The production of related guidance influenced by this process is welcomed by the Assessment Team, as it will help staff name documents correctly and consistently to aid the efficient location of information.</p> <p>The authority shows marked progress in their recent self-assessment update in working towards compliance with Element 4. The element remains at amber while work continues.</p>
5. Retention Schedule	A	A	A	PKC formally adopted the Scottish Council on Archives Records Retention Schedules (SCARRS) in 2011 (see evidence items 5.1 and 5.2). The RMP states that practical implementation of SCARRS has not been uniform across the	SCARRS has been implemented for unstructured records, and work is ongoing to migrate records from shared drives to EDMS. Retention policies will also	The Team thank the PKC for the update regarding the ongoing implementation of SCARRS. It is clear

				<p>Council and that previous retention schedules are still being used in some business areas..</p> <p>The work to bridge the gap in consistent application of records scheduling appear to be part of the EDMS and BCS implementation project. The RMP outlines the timescale for the development of staff guidelines and training for using the retention schedules. The Keeper would appreciate sight of these once completed. Also highlighted is the necessity for the records manager to work with business areas within the Council to develop retention schedules that meet their needs. As this is tied into the EDMS implementation project, the timescale for completion is the end of 2016.</p> <p>The Keeper can agree this element on an 'improvement model' basis provided he is kept up-to-date on the progress of the EDMS and BCS implementation project. The Keeper is convinced that there is a commitment to close the gap in provision in this area.</p>	<p>be applied to M365 applications such as TEAMS and OneDrive. A new piece of work is being assessed to evaluate the success of SCARRS retentions when applied to stand-alone legacy business applications. The results of the evaluation exercise will inform further plans to develop retention on business systems. There is still ongoing work to improve knowledge and understanding of SCARRS across the organisation. The Records Manager also works as part of a Digital Board which has responsibility for any new systems being procured, to ensure that records management policy and SCARRS retentions are embedded into these by design.</p>	<p>that the authority are considering the impact of M365 implementation on their RM processes and are working to ensure that proper retention schedules will be applied to applications such as TEAMS and OneDrive.</p> <p>The Assessment Team are interested to hear that the authority are using legacy business applications to evaluate SCARRS, and that the results of this project will be used to develop retention schedules on their business systems going forwards.</p> <p>PKC continue to work hard to improve understanding of SCARRS across the organisation. The Team commend the inclusion of the Records Manager on the Digital Board as</p>
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						<p>this will help ensure that the authority's RM obligations are carefully considered alongside other business needs during the implementation of new technology and systems.</p> <p>The element remains at amber while work is ongoing. The Team would be interested to hear updates regarding work on this element in future PURs.</p>
6. Destruction Arrangements	A	A	A	<p>PKC has set out its arrangements for the destruction of the following:</p> <p><u>Paper records</u> The Information Security Management System procedures document (evidence item 6, section 10.7.2.2, page 19) sets out the procedures in place for the confidential destruction of paper records, however the RMP (page 54) states that the procedures in place for the destruction of paper records require 'clarification and enforcement' across the Council. This would indicate that current practice is not consistent across the Council and that some business areas are not following the existing procedures. A contract with a commercial shredding company (evidence</p>	<p>The use of an EDMS has improved this area considerably. This is, however, at an early stage and so far, records that have come for disposition are in the 1-year category. <i>The disposition records are currently exported and retained. There is further development to be done in this area as the out-of-the-box M365 does not fully serve the ambition of the organisation. Disposition as standard in this platform can only be done manually and does not offer easy aggregation of records.</i></p>	<p>The authority notes that they have further work to do regarding the implementation of M365 and the appropriate disposition of records. The Team would be interested in hearing how this is progressing in future PURs.</p> <p>PKC's commitment to staff training and awareness covering various facets of</p>

				<p>item 7.1) has also been submitted.</p> <p><u>Electronic records</u> The RMP states that most deletion is currently carried out by individuals. At present there is no guidance or procedures in place to inform staff how they should consistently destroy electronic records at the end of their life-cycle. It is envisaged that the roll-out and implementation of the EDMS will improve provision in this area.</p> <p><u>Back-ups</u> There is no evidence to suggest that there are procedures in place to delete copies of electronic records maintained on back-up drives/servers as part of business continuity arrangements.</p> <p><u>Hardware</u> The Information Security Management System procedures document (evidence item 6, section 10.7.2.1, page 18) details the policy for shredding and destruction of hard drives, CDs/DVDs and other optical media. The policy assigns responsibility for ensuring secure destruction of optical media (and presumably other hardware such as mobile devices, laptops and desktop PCs) to the Head of IT. The RMP states 'ad hoc secure hardware disposal practices are in place'. This suggests that there is no consistent method currently in place for securely destroying hardware once it becomes obsolete.</p> <p>The RMP highlights that there are weaknesses in the consistent application</p>	<p>As part of EDMS implementation, the Records Management and Project team have held regular training and awareness sessions covering how to use EDMS, file plans, Records Management Policy, and records disposition. These training sessions are recorded and available to staff on demand, alongside short guides to other areas of EDMS and records management good practice.</p> <p>a. Backups - These are kept for a continuous 90-day period. This means anything deleted as part of disposition will permanently delete after these 90 days, as it will no longer be in the M365 preservation library, and the backup will be discarded. This ensures that records which have been marked for permanent disposition are in fact disposed of</p> <p>b. Hardware - The hardware asset management process is that that all hardware is returned to IT at the end of its life. IT maintain a hardware asset register which has asset numbers (CI) for all hardware. A third-</p>	<p>records management, including disposal, is commendable, and will bolster good practice across the organisation.</p> <p>In their recent self-assessment, the authority has laid out their processes for the disposal of information, including detailed explanations of disposal practices relating to backups, hardware, paper records, and the documentation of material that has been destroyed. There has been significant progress in this area which the Assessment Team commend.</p> <p>PKC have clearly worked hard to improve their RM practices surrounding Element 6. The element remains at amber while work surrounding migration to M365 continues.</p>
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				<p>of practice in the secure destruction of paper and electronic records across PKC. It also states that the documentation of the destruction of records and hardware is also not consistent across the authority and this is apparently an area that has been identified by PKC's Internal Audit.</p> <p>The action points included in the RMP state that by the end of 2015 a set of standards for the destruction of all records at the end of their life-cycle will be developed. Guidance and training on destruction will be developed for staff by the end of 2016. Longer-term, destruction 'tidying up' operations will take place allied to the roll-out of the corporate EDMS by 2019. Additionally, procurement documents for future business IT systems will be developed which will include consideration of record and document functionality by the end of 2019. Section 5.6 of the RMP itself and the covering letter from the Senior Responsible Officer (see Element 1) both commit the Council to carrying out these action points to improve the level of provision in this element. The Keeper welcomes the honest recognition of gaps in this area and the necessary commitment to improve the situation.</p> <p>The Keeper can agree this element on an 'improvement model' basis. This means that PKC have indicated that they have identified areas for improvement and have a plan in place to improve the level of provision, including timescales. There is also a commitment by the Senior</p>	<p>party contractor picks up hardware from all council offices when requested and shreds the hard drives for these prior to recycling. A certificate of destruction is produced for each item and recorded in the asset register. This process is audited by IT and Internal Audit to ensure that items are disposed of in line with policies. IT also conduct an annual visit to the facility where items are destroyed to see the process in person.</p> <p>c. Paper Records - Paper records are destroyed in line with the Records Management Policy. The Council has a confidential waste disposal service which is operated by its property team; all records due for destruction are placed in the confidential bins located in all buildings and collected on a regular basis. The Premises Management team provides a log of all records which have been destroyed as part of this process.</p>	
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				Responsible Officer that these actions will be taken forward. As part of his agreement of this element, the Keeper will need to be kept updated on the progress of work to achieve these improvements.		
7. Archiving and Transfer	A	A	A	<p>The RMP states that the selection of records suitable for permanent preservation does not take place consistently across the Council. Evidence has been submitted (evidence items 8.1 and 8.2) to show that the selection of records for permanent preservation and agreement does take place on an ad hoc basis. The RMP itself states the 'systematic annual selection does not take place across the Council'.</p> <p>One of the action points included in the RMP is to develop a Service Level Agreement (SLA) and associated guidance by the end of March 2016. Training will also be developed by the end of 2016 and rolled-out across the Council. Longer-term work will also be undertaken to quantify the amount of physical storage required to meet the Council's needs and to devise an e-archive solution (both by end of 2019). The action points will help to standardise practice across the Council.</p> <p>Section 5.6 of the RMP itself and the covering letter from the Senior Responsible Officer (see Element 1) both commit the Council to carrying out the action points to improve the level of provision in this element. The Keeper welcomes the honest recognition of gaps in this area and the necessary</p>	<p>The EDMS provision includes an Archive site. Although this is at an early stage, the process has been designed to enable seamless transfer of records earmarked for Archive selection to this site. There are no limitations of storage capacity within the new EDMS platform as there were in previous iterations. The availability of more storage makes it easier to design an archival storage solution while the long-term arrangements for digital preservation are worked out. It is recognised that the EDMS is not equivalent to digital preservation and the principle of preservation is being implemented or built into the solution by design, and with the view that changes may be required in the future. Preservation and Archive transfer within the EDMS will be refined and reviewed as the technology improves.</p> <p>Any documents which are transferred to the Archive site will be marked as a record which makes them immutable. There</p>	<p>The Team thank PKC for the update regarding Element 7. Currently, the authority have set out an interim digital preservation solution utilising their EDMS. PKC recognise that this is not a substitute for permanent preservation provision, and, in collaboration with the Archivist, are working towards the creation of a long-term digital preservation solution. The Team would be pleased to hear how this progresses in future PURs.</p> <p>In the authority's RMP, PKC noted action points regarding the development of a Service Level Agreement (SLA), and a longer-term project</p>

				<p>commitment to improve the situation.</p> <p>The Keeper can agree this element on an 'improvement model' basis. This means that PKC have indicated that they have identified areas for improvement and have a plan in place to improve the level of provision, including timescales. There is also a commitment by the Senior Responsible Officer that these actions will be taken forward. As part of his agreement of this element, the Keeper will need to be kept updated on the progress of work to achieve these improvements.</p>	<p>are ongoing discussions with the Archivist and her team to map what true digital preservation looks like in this environment; however, the solution as implemented will allow records to be preserved in the medium term.</p>	<p>to assess the amount of physical storage needed to meet the Council's needs. The Assessment Team would be interested to hear of progress regarding these action points in future PURs.</p> <p>The Element remains at amber while work is ongoing.</p>
8. Information Security	G	G	G	<p>Update required on any change.</p>	<p>There has recently been a change in personnel, with Records Management and Information Security Management operation as a combined role. Appropriate policies to manage information security are in place; the council holds PSN accreditation and meets industry standards for this area.</p>	<p>The Team thank PKC for this update.</p> <p>The Team commend the authority for continuing to meet industry standards for information security, demonstrated by their PSN accreditation status, and for ensuring that appropriate policies are implemented in regards to this Element.</p>
	G	G	G	<p>Update required on any change.</p>	<p>A new Data Protection Officer</p>	<p>The Team thanks the</p>

9. Data Protection					was appointed in August 2021.	authority for this update.
10. Business Continuity and Vital Records	G	G	G	Update required on any change.	No change to previous arrangements.	Noted with thanks. Update required on any future change.
11. Audit Trail	A	A	A	<p>The RMP sets out the current audit trail provisions in place within PKC. There are systems in place to be able to track paper files, monitored by records management staff, although there are no provisions in place for documenting the transfer of files from one member of staff to another once a file has been checked out of storage. Evidence has been submitted as an example of current practice (evidence item 13). The RMP also states that version control is used inconsistently across the Council.</p> <p>The RMP states that with regards to electronic records some systems track the movement of files and some track version control, but there is no uniform way practice in the retention of movement logs or of recording changes to documents.</p> <p>A by-product of the implementation of the EDMS will be to introduce consistent audit trail functionality. The future actions identified in the RMP include the training of records management staff to manage the EDMS and to produce guidance and staff training programmes, including on audit trails.</p>	<p>EDMS as implemented on M365 has improved the audit trail provisions for documents. The M365 application retains versions of all documents which are stacked within the document; therefore, several versions can be viewed and compared. Auditing has also been enabled across the EDMS which allows administrators and records managers to trace any changes made to documents.</p> <p>Records Management team staff have been providing training sessions across the organisation, which have included refresher training on records handling, file plans, records disposition, and preservation. This is seen as an ongoing activity, which adds value to information management within the organisation as well as encouraging good records management practice.</p>	<p>The Assessment Team are pleased to receive the authority's update on progress in this area. The implementation of the EDMS on M365 has allowed for better oversight of version control and audit trail enabling the appropriate tracking the movement of, and changes to documents.</p> <p>The provision of ongoing staff training sessions is commendable and shows PKC's commitment to raising awareness of information management and the importance of good RM practices across</p>

				The Keeper can agree this element on an 'improvement model' basis. This means that he understands that an authority has identified a gap in provision and that they have shown a commitment to improving in that area. As part of the agreement of this element, the Keeper requests that he is kept informed as work progresses to improve audit trail provision in PKC.		the organisation. As with elements above, PKC have made significant improvements. here The implementation of M365 will greatly enhance audit trail capability. While the migration to M365 continues, the element remains at amber.
12. Competency Framework	G	G	G	Update required on any change.	No change.	The Assessment Team note that training and guidance for staff is addressed by PKC under various elements throughout the authority's Self-assessment Update, including in conjunction with the roll-out of M365. This is commended. Update required on any future change.
13. Assessment and Review	A	A	G	The RMP states that at present there is no assessment and review process in place to monitor the implementation of the RMP. The RMP itself was developed by the use of a Records Management Maturity Model Questionnaire (see appendix 4). The Questionnaire will be	The implementation of the EDMS which enables the Council to meet the standard for several elements within the RMP has been used to assess and review compliance over the last 5 years.	The Assessment Team thank PKC for the update on this Element. It appears that the

				<p>issued again prior to the implementation of the RMP and this will act as a baseline level against which improvements can be measured.</p> <p>In the action points part of this element there is a commitment to using the Archives and Records Management Services (ARMS) tool, which was developed by the Scottish Council on Archives. This will be adapted to suit the requirements of PKC. This is planned to be completed by October 2015. This will be accompanied by the development of a review process and a report format and this will be introduced in 2016.</p> <p>The Keeper can agree this element of the RMP on an 'improvement model' basis, provided he is kept informed of progress in closing the gap in provision in this area.</p>	<p>The EDMS project is due to complete in March 2022 and at this point a Review and Lessons Report will be drafted for approval by the Council's Policy and Governance group. It is intended that part of the output of this review will include an updated RMP and methods to review future progress and improvements, as well as a possible new project to improve records management within legacy systems.</p>	<p>authority have utilised the implementation of their EDMS as a review mechanism and that this has allowed for new opportunities to assess and review PKC's RM processes. The Assessment Team would be interested to know in future PURs if this review mechanism has replaced PKC's earlier commitment in their RMP to using the ARMS tool.</p> <p>The Team welcome news that after the completion of the EDMS project in March 2022, PKC plan to put together a report of lessons learned and utilise their findings to further develop their future RM practices, and turn their attention to a potential new project improving RM within the authority's legacy systems. The Team</p>
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						<p>would be interested to hear of progress in future PURs.</p> <p>The authority have also shown their commitment to compliance with Element 13 by taking the opportunity to participate in the voluntary PUR process.</p> <p>If this was a resubmission of the authority's RMP it is likely that, with appropriate evidence supplied, the Element's RAG status would change from amber to green.</p>
14. Shared Information	G	G	G	Update required on any change.	<p>No change - information sharing protocols are in place for the sharing of any Council information with a third party. Information sharing within the Council is managed.</p> <p>Before sharing any information, staff ensure that the appropriate arrangements are in place. In addition, staff ensure that the party receiving the information</p>	<p>The Assessment Team commend the Council for having appropriate protocols in place to manage information shared both within the authority and externally. Compliance with this Element is also supported by staff</p>

					understands the meaning of the information as it is presented.	following set procedures before sharing information. Update required on any future change.
ADDITIONAL ELEMENT: 15. Electronic records	A	A	G	The Keeper welcomes the addition of this element because it shows that the RMP has been developed as a business tool to specifically meet the needs of PKC. The Keeper would request that he is kept informed of progress with regards to this element.	There is coordination of technology provision within the council. Since the adoption to the Records Management Policy, the Council has brought together a Digital Board. The purpose of this board is to coordinate and govern all digital provision and to make recommendations for standards which should be followed, including records management within all new systems. There is a new piece of work being assessed currently, which will look at records management provision within legacy systems to bring them in line with the current Records Management Policy, or to ensure their replacements meet the standards required. The Executive Officer Team (EOT) has also recently approved retention policies which will be applied to stand alone M365 applications which contain records (Teams, OneDrive, Outlook). The application of these	The Assessment Team commend the formation of a Digital Board. This will help provide extra oversight of the appropriate management and preservation of digital material across the authority. The authority are currently making provision to ensure appropriate RM takes place within both their legacy and newer systems, and that M365 applications are encompassed within retention policies recently approved by the EOT. We look forward to updates on how this work progresses in subsequent PURs.

					<p>policies is scheduled start in Jan 2022.</p> <p>The EDMS solution covered all records storage areas outwith of stand-alone business systems. The implementation of EDMS has also incorporated a large-scale project to digitise paper records and store them within appropriate EDMS sites, business systems, or electronic archive storage. All files being digitised in this manner include an Object Character Recognition (OCR) feature which enables metadata to be picked up easily and the content of the records, as well as their titles, to be searchable. This will enhance the electronic file provision within the council and make records available to the right people at the right time.</p>	<p>Throughout PKC's recent self-assessment, the authority have noted that the implementation of their EDMS has provided new opportunities to improve record management practices across the organisation. The Assessment Team is pleased to hear that this also includes a project to digitise paper records, and that the authority have provisions in place to capture appropriate metadata which will allow for records to be findable and accessible in the future.</p> <p>It appears that the authority have achieved their original intention in adding this extra Element in ensuring that appropriate RM provisions are made for electronic records</p>
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						across new, existing, and legacy systems. For the purposes of the PUR, this Element turns green.
<p>ADDITIONAL ELEMENT: 16. Third party service provider compliance</p>	A	A	G	<p>The Keeper can therefore agree this element it on an 'improvement model' basis, provided he is kept updated on progress towards meeting the Council's level of requirement.</p>	<p>Good records management practice has been embedded throughout the council with the implementation of EDMS. The Procurement and Information Governance teams have worked with services over the last few years to ensure that records management requirements are included as part of any procurement exercise and therefore any third parties who are awarded contracts manage records in line with the council's Records Management Policy. There is continuous training provided by the Records Management team and available to all staff to improve awareness of the Records Management Policy and the tools available to staff.</p> <p>We recognise that the issue of third-party service provider compliance is complex, and the Council is striving to make continuous improvements in this area by utilising technology and</p>	<p>As the authority may be aware, public records created or held by third-parties is now covered by Element 15 of the Keeper's Model Plan. The Assessment Team commend PKC for having already included third-party compliance in their RMP and welcome the update in their recent PUR self-assessment.</p> <p>The authority are clearly committed to ensuring that third-party arrangements include appropriate records management processes which align with the Council's Records Management Policy. This is aided by the electronic management of</p>

					<p>wherever possible ensuring that records are managed electronically. It is considered that this approach will help improve this area and ensure records are kept securely and for an appropriate length of time.</p>	<p>records, and good practice will be bolstered by PKC's training of their own staff.</p> <p>The Team would like to direct you to updated guidance on Element 15 of the Keeper's Model Plan, relating to public records being created by third party organisations when delivering a public function under contract to a public authority scheduled under the Act. The Team hope this will assist the authority when considering types of evidence to submit when it comes to resubmission of their RMP. You can view the Keeper's Guidance to all Elements, including public records held or created by third-parties here: nrscotland.gov.uk.</p>
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						It is likely that with appropriate evidence this element would turn green upon resubmission of PKC's RMP.
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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 15th November 2021. The progress update was submitted by Khopolo Jamangile, Records and Information Security Manager.

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

The Assessment Team has reviewed Perth and Kinross 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

Perth and Kinross 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.

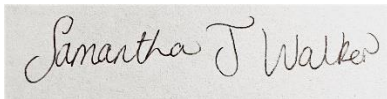
The Keeper cannot change the status of elements formally agreed under a voluntary submission, but he can use such submissions to indicate how he might now regard this status should the authority choose to resubmit its plan under section (5)(6) of the Act.

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

Based on the progress update assessment the Assessment Team considers that Perth and Kinross 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

A rectangular box containing a handwritten signature in cursive script that reads "Samantha J Walker".

Samantha Walker
Public Records Support Officer