

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

**Renfrewshire Valuation Joint Board**

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

**28<sup>th</sup> July 2022**

**Contents**

1. The Public Records (Scotland) Act 2011..... 3  
2. Progress Update Review (PUR) Mechanism..... 3  
3. Executive Summary..... 3  
4. Authority Background..... 4  
5. Assessment Process..... 4  
6. Records Management Plan Elements Checklist and PUR Assessment..... 5-13  
7. The Public Records (Scotland) Act Assessment Team’s Summary..... 14  
8. The Public Records (Scotland) Act Assessment Team’s Evaluation..... 14

## 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 Renfrewshire Valuation Joint Board. The outcome of the assessment and relevant feedback can be found under sections 6 – 8.

#### 4. Authority Background

Renfrewshire Valuation Joint Board was established by the Valuation Joint Boards (Scotland) Order 1995 to carry out the valuation functions of Renfrewshire, East Renfrewshire and Inverclyde Councils.

It came into existence on 1 April 1996 and was also given the responsibility of carrying out Electoral Registration on behalf of the three constituent authorities.

The composition of the membership of the Board is determined by the above Order and consists of 8 Councillors representing Renfrewshire Council and 4 each representing East Renfrewshire and Inverclyde Councils.

<http://www.renfrewshire-vjb.gov.uk/>

#### 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.
----------	---	----------	---	----------	--

## 6. Progress Update Review (PUR) Template: Renfrewshire Valuation Joint Board

Element	Status under agreed Plan 18JAN16	Progress status 04JUN20	Progress status 28JUL22	Keeper's Report Comments on Authority's Plan 18JAN16	Self-assessment Update 07APR20	Progress Review Comment 04JUN20	Self-assessment Update as submitted by the Authority since 04JUN20	Progress Review Comment 28JUL22
1. Senior Officer	G	G	G	Update required on any change.	No Change.	No immediate action required. Update required on any future change.	As notified to Pete Wadley and Hugh Hagan by email from Lindsey Hendry on 19 October 2021, the Assessor for Renfrewshire Valuation Joint Board, Kate Crawford, retired on 17th October 2021. Robert Nicol is the new Assessor and is now the Senior Officer who has corporate responsibility for our records management.	The Assessment Team is grateful for this update which has been noted.
2. Records Manager	G	G	G	Update required on any change.	No Change.	No immediate action required. Update required on any future change.	No change.	Update required on any change.
3. Policy	G	G	G	Update required on any change.	In addition to the installation of the Electronic Data Management System (EDMS), Laserfiche, in 2017, Renfrewshire Valuation Joint Board (RVJB) has also installed a new electronic Electoral Management System (EMS) in 2019 for the function of Electoral Registration. This system allows all documents relating to an individual elector or property to be saved electronically in the relevant area with the requisite retention period attached. It can also hold details of all notes/correspondence relating to an individual/property at a specific electoral event. As a result of this development, the Records Management Policy is being further reviewed to incorporate these changes to Electoral Registration practice to records management and will be rolled out to staff when the review is completed.	<p>Thank you for this update.</p> <p>The Assessment Team notes the developments in the electronic systems used by the authority (see our comments on element 4 below for more).</p> <p>It is to be expected that information governance policies and guidance will need to be revised to take account of these changes and the Assessment Team has noted that the VJB's Records Management Policy is undergoing such a review at the time of PUR submission.</p> <p>The Assessment Team has every confidence that the new Policy will be approved and rolled-out and thus this element retains its Green RAG status.</p> <p>The Assessment Team invite the authority to supply a copy of the new policy at the time of their next PUR in order that their submission can be kept up-to-date.</p>	<p>The Records Management Policy was fully reviewed and approved by the Governance Working Group on 27 April 2021.</p> <p>The updated Policy sets out Employee responsibilities in more detail, including that key knowledge and skills required by staff with operational responsibility for records management will be clearly defined and explained to staff to ensure that they understand their roles and responsibilities. The updated Policy also reinforces that the Data Protection Officer is responsible for delivering staff training on Records Management.</p> <p>This was circulated to all staff on 27.4.21</p> <p>The Housekeeping Manual for the Electoral Management System (EMS) was agreed by the Governance Working Group to be kept as a separate document as not all RVJB staff have access to the EMS. This is in line with Data Protection Principles, as only staff who have a business need to obtain access are provided with the appropriate authentication. The manual</p>	The Assessment Team thanks you for this update on Records Management Policy review, and the associated changes in RVJB approach to operational records management and the required knowledge and skills. The Team have no concerns about this Element, but require an update on any change.

							was circulated to staff for information purposes.	
4. Business Classification	G	G	G	Update required on any change.	<p>The Business Classification Scheme is currently being reviewed for the installation of the new EMS as well as for the second stage of the installation of the EDMS – migrating all our data stored on our network shares on to the EDMS.</p> <p>Once finalised and approved by the Governance Working Group, the reviewed Business Classification Scheme will be rolled out to staff for their information.</p>	<p>As with the previous PUR, the Assessment Team notes the development of the authority's Business Classification Scheme to inform the migration of public records from shared drives to an eDRM. This should represent a significant improvement in records management provision in RVJB. However, the move to eDRM is bound to be incremental and will take some time to properly bed-in. In the meantime the Assessment Team accepts that all the public records of the authority are either covered by the new eDRM or by the old shared drives system. Therefore they are happy to indicate a continuing Green RAG status for this element.</p> <p>The authority is also part way through a major hard-copy scanning programme (see under element 5 below). Again the Assessment Team is happy to accept that public records are either covered by the new eDRM structure (post-scan) or the original paper record filing system (pre-scan).</p> <p>The Assessment Team also notes that the authority has new line-of-business electronic management system to deal with registration. This system has records management functionality including retention and record tracking capability (see element 11). The Keeper has previously accepted that line-of-business systems may offer appropriate information governance provision without him requiring technical details. Frankly, it is not practical for the Keeper to try and assess hundreds of individual systems, some of which may have been designed specifically for a single activity in a single authority. The Keeper considers that it remains the responsibility of the authority installing such a system to</p>	<p>The Business Classification Scheme is in the process of being reviewed, with the Records Manager currently incorporating into the Board's Retention Schedule for ease of reference.</p> <p>Significant work has been done in relation to hard-copy scanning. All Council Tax paper files have now been fully scanned and paper files securely destroyed. Valuation records are now fully electronic. We are a substantial way through the scanning of Non-Domestic paper files and work will continue on this throughout the coming months. It is notable that some files are not capable of being held electronically, for example large architect's plans and these will be kept in paper format which are tracked via the paper record filing system.</p> <p>Work on the shared drive for valuation data was stopped as there is a planned move of our core Valuation system to a new valuation system and files will be migrated to this system. The system will significantly contribute to good records management as it is, designed with electronic retention periods. It is currently expected the migration to the system will be the latter half of this year.</p> <p>The Records Manager, DPO, Senior IT Manager and Service Co-Ordinator have held monthly meetings to discuss, review and manage Electronic Records Management. As a result of these regular meetings there has been significant development to the migration of personnel, governance, and corporate electronic files over to the EDMS. The software allows retention timescales to be added when a document is added to ensure efficient records management.</p> <p>The Records Manager and DPO have also been having regular meetings with an IT Manager and Senior Clerical Manager with responsibility for the</p>	<p>Thank you for updating the Assessment Team on this Element. We note that Valuation records are now fully electronic, and that scanning of other records continues. It is perfectly reasonable to maintain paper format records as indicated.</p> <p>We note the upcoming move to a new line-of-business system with thanks.</p> <p>Thank you also for letting us know about the regular electronic records management meetings. Keeping records management on the agenda is a good way to ensure that it continues to be considered alongside any changes in the operations of the organisation, and it sounds like RVJB keeps RM matters appropriately high-profile.</p>

						satisfy themselves that the information held is adequately protected and controlled. The authority should alert the Keeper when a line-of-business system with records management implications is installed and the Assessment Team is pleased to acknowledge that RVJB have done this.	electronic system Elector8 to ensure it is being used to its full capacity for good electronic management of records.	
5. Retention Schedule	G	G	G	Update required on any change.	<p>The Retention Schedule is a living document and is under constant review by the Governance Working Group to take account of legislative changes, amendments to our working practices and ensuring it is up to date. The scanning of all our domestic files on to the EDMS has been completed and each document within the electronic file for each property has a retention period attached which is relevant to that particular document. This ensures we are managing our electronic records safely, securely and in line with data protection principles.</p> <p>The scanning of the Board's non-domestic property files will start as soon as possible. In preparation, these property files have been cleared as per our retention schedule to ensure the documents being scanned are relevant to each property and held in line with our retention schedule. Again, each document scanned will have the appropriate retention period attached to ensure we are managing our electronic records appropriately.</p> <p>The Retention Schedule has also been updated to reflect the installation of the new EMS and is currently being reviewed by the Governance Working Group. Once finalised, the Retention Schedule will be rolled out to staff and published on our website.</p>	<p>The migration from one system to another is an excellent opportunity for an organisation to data cleanse and the Assessment Team is happy to acknowledge that RVJB have clearly recognised this.</p> <p>In their original submission RVJB committed to keep its information governance policy documents under review and the Assessment Team acknowledge that this is being done.</p> <p>There is a recognition that a retention schedule is a 'living document' and will be subject to continual minor change year on year. For example the addition of the new Electoral Management System (see element 4) has required a retention schedule update.</p>	<p>The Retention Schedule was reviewed and significantly revised in April 2021. This is held on our EDMS to ensure staff are aware of the appropriate retention periods when dealing with documents. It is also held on RVJB's website.</p> <p>As referenced in Element 4, the Business Classification Scheme is in the process of being reviewed, and will be incorporated into the Board's Retention Schedule for ease of reference.</p> <p>The Governance items were expanded on to more fully reflect the records handled by the organisation, as well as a new HR sheet created to set out in more detail the extent of the HR records held. The more detailed itemisation should ensure that the retention and disposal arrangements are more accurately followed.</p>	<p>The Assessment Team is grateful for this update on the revision of RVJB's Retention Schedule. The current project of reviewing the Business Classification Scheme is a good opportunity to review both.</p> <p>The more detailed itemisation within the Schedule is also noted with thanks.</p>
6. Destruction Arrangements	A	A	A	The Board recognises the importance of the secure and irretrievable destruction of records and has supplied their <i>Protective Marking Handling Disposal Policy &amp; Procedures</i> document as evidence. However, the processes by which electronic records will be destroyed will form part of another policy which has not yet been rolled-out. The Keeper requests that this policy is forwarded to him as soon as it	The EDMS has a robust archiving system and as listed in the PUR carried out by RVJB in 2018, the Laserfiche workflow runs at the end of each month to identify the documents that meet the retention criteria as per RVJB's retention schedule. Laserfiche workflow sends a link to the folder where the documents, which have met their expiry date, have to be reviewed. At this point documents can either be deleted using the metadata fields in the document template or retained.	<p>The migration from one system to another is an excellent opportunity for an organisation to data cleanse and the Assessment Team is happy to acknowledge that RVJB have clearly recognised this (see element 5).</p> <p>The full roll-out and training on the eDRM has not yet been completed (see element 4). Until this work is concluded the RAG</p>	The EDMS workflow runs at the end of each month to identify the documents that meet the retention criteria as per RVJB's retention schedule. A link to the folder where the documents, which have met their expiry date, are reviewed by appropriate personnel and documents are either deleted using the metadata fields in the document template or retained. The workflow runs every month and is cleansed appropriately immediately.	Thank you for this explanation of EDMS workflow with regard to regular, practical records destruction. Thank you also for clarifying how this works when it comes to the gradual migration of all data stored on network shared drives.

				<p>becomes available in order that he may keep the Board's submission up-to-date.</p> <p>The Board is also considering incorporating the automated disposal of electronic records within their IT system. Whilst this must remain a business decision for the Board, the Keeper commends this initiative and asks that he be kept informed and supplied with details should a decision be taken.</p> <p>The Keeper agrees that Renfrewshire Valuation Joint Board has procedures in place to suitable destroy paper records, hardware and back-ups when appropriate, as required by the Act. He agrees this element of the Plan on 'improvement model' terms on the condition that the Board pursues the creation of a policy detailing the management (including deletion) of electronic records as committed to on page 12 of the Plan.</p>	<p>This Laserfiche Workflow ensures electronic documents are retained where required and data, where no business need or legislative requirement to hold has been identified and once verified by the relevant staff member, is removed from our systems at the relevant date stated on the retention schedule.</p> <p>The second stage of the installation - the migration of all our data stored on network shares to the EDMS has commenced although priority was given to the migration to the new EMS in August 2019 to ensure RVJB was able to deliver any unplanned electoral events on the new system. As we have fully migrated to the new EMS, attention to the second stage of the EDMS installation will be focussed on and once completed the appropriate training will be given to staff.</p> <p>An Electronic Management of Records Policy has been completed but as of March 2020, is currently being adapted to incorporate the electronic management of the documents contained within the EMS. Once this is finalised with the EMS incorporated into the Policy, it will be reviewed and approved by the Governance Working Group again in line with data protection principles.</p>	<p>status of this element remains amber. However, the Assessment Team is satisfied that, once fully implemented, a properly executed eDRM should provide a method for RVJB to be confident their electronic records are deleted when appropriate.</p> <p>In 2016 the Keeper agreed that RVIB had procedures in place to suitable destroy paper records, hardware and back-ups when appropriate, as required by the Act.</p> <p>Therefore, once the electronic destruction system has been fully implemented and evidence of this provided, it is likely that this would enable the RAG status for this Element to move from Amber to Green.</p>	<p>There has been significant development in the second stage of the installation - the migration of all our data stored on network shares to the EDMS with an emphasis on the migration of personnel, governance, and corporate electronic files over to the EDMS as these documents contain personal data which are deleted when no longer required as retention timescales are added to each document from the date the document was created, not when saved on to the EDMS.</p> <p>Work on the shared drive for valuation data was stopped as there is a planned move of our core valuation system to a new valuation system and files will be migrated to this system. The system will significantly contribute to good records management as it is, designed with electronic retention periods. It is currently expected the migration to the system will be the latter half of this year.</p> <p>As referenced in Element 3, the Housekeeping Manual for the Electoral Management System (EMS) was agreed by the Governance Working Group to be kept as a separate document as not all RVJB staff have access to the EMS. The manual was circulated to the relevant staff for information purposes and appropriate training given.</p>	<p>It is clear that RVJB has invested in the improvement of its electronic records management operations (including both EDMS and a line-of-business system for valuation data), but that the full roll-out of these systems is still an ongoing endeavour.</p> <p>The Team also thanks you for the update on the specificity of separate EMS guidance which has been noted.</p> <p>This element will remain at Amber until the electronic records destruction systems have been fully implemented and are operational.</p>
7. Archiving and Transfer	G	G	G	Update required on any change.	No Change.	No immediate action required. Update required on any future change.	No change.	Update required on any change.
8. Information Security	G	G	G	Update required on any change.	The situation regarding Information Security has not changed as it is mandatory for all staff to complete an online training course each year on Information Security. The Board's DPO also provided additional training on Information Security in 2019 tailored to the three functions of the Board i.e. domestic/ non-domestic valuation and electoral registration.	Thank you for the update regarding expanded information security training (see element 12).	The Information Security Policy has been reviewed and updated, most recently in August 2021.  In November 2021, the organisation implemented software called Safe Send for All Staff. This software is designed to prevent misaddressed emails being sent or the wrong attachments issued. The software requires users to confirm external recipients and attachments after initially selecting 'send' in Outlook.	Thank you for letting the Assessment Team know that the Information Security Policy update took place in August 2021.  It is also interesting to hear about the Safe Send software implementation and the Cyber Security awareness campaign.



							<p>The software has also been configured to pick up certain words such as 'confidential', 'internal', 'restricted' etc as well as NINO's and credit card numbers to alert staff and ask them to think twice about who and what information they are sending. SafeSend can also help to prevent spear phishing attacks by highlighting external email addresses, even ones that look like they came from within your organisation.</p> <p>The Board's DPO carried out Information Governance training to All Staff in June and July 2021, tailored to the three functions of the Board i.e., domestic/ non-domestic valuation and electoral registration, which included training specifically on Information Security matters.</p> <p>The Board's DPO introduced a monthly Think Twice bulletin in January 2021 which is issued to All Staff. This monthly bulletin ensures that key information security messages are disseminated to all staff on a regular basis.</p> <p>The Board's DPO also ensures that the Information Security Reporting Procedures are circulated to all staff every 3-months, most recently in February 2022.</p> <p>It remains mandatory for all staff to complete an online training course each year on Information Security.</p> <p>In addition to this, in April 2021 our IT section ran an awareness campaign on Cyber Security for all staff. This included issuing several mock phishing emails to all staff and additional training for those staff who failed to identify it was a suspicious email. At this time, all staff were required to complete VIPRE training courses on (i) Defending Against Phishers and (ii) Ransomware, how to defend yourself. This is an annual awareness campaign which will be replicated this year for all staff.</p>	<p>Staff training updates are explored under Element 12.</p> <p>It is evident from this update that RVJB continues to recognise the importance of robust information security arrangements.</p>
--	--	--	--	--	--	--	---	---

							Cyber Security Courses are also mandatory for all staff and are delivered via online training courses.	
9. Data Protection	G	G	G	Update required on any change.	<p>Data protection is a standing item on the agenda of the Governance Working Group which is chaired by the Records Manager. All policies, data sharing and data processing agreements have been reviewed by the Governance Working Group and the DPO to ensure compliance with data protection legislation. The DPO also reviewed and approved the Information Asset Register.</p> <p>Prior to any new project being initiated by RVJB, a Data Protection Impact Assessment is carried out. This ensures RVJB is incorporating the principles of data protection at the beginning of every new project.</p> <p>To ensure staff keep abreast of their responsibilities relating to data protection, all staff must complete a mandatory online Data Protection course annually. The Board's DPO also provided data protection training which incorporated relevant case law since the GDPR and Data Protection Act 2018 came into force.</p> <p>The Records Manager is also supported by Senior Management by being encouraged to attend training courses identified as appropriate.</p> <p>The Senior Manager and Records Manager are members of the SAA Governance Committee who meet regularly to discuss and information share on data protection and other items relating to governance.</p>	<p>As with all other Scottish public authorities Renfrewshire Valuation Joint Board 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 Board website has been updated appropriately:</p> <p><a href="https://3f3c692d-7f07-45d6-8734-8e46ce5d269f.filesusr.com/ugd/5b0c07_88295bd541bc445284b828328ba4de7d.pdf">https://3f3c692d-7f07-45d6-8734-8e46ce5d269f.filesusr.com/ugd/5b0c07_88295bd541bc445284b828328ba4de7d.pdf</a></p> <p>This is linked directly from the home page. This is to commended.</p> <p>The assessment Team notes the implementation of a Data Protection Impact Assessment process as part of the corporate activities of the authority (for example before starting the procurement process for both the EMS and the Disaster Recovery Solution) – for more see text under element 14.</p> <p>For training see element 12.</p>	<p>Data protection remains a standing item on the agenda of the Governance Working Group which is chaired by the Records Manager. The Board's DPO is now a member of the Governance Working Group and provides updates and advice to the Governance Working Group monthly.</p> <p>The Data Protection Policy was reviewed and updated in January 2021.</p> <p>The Public Privacy Notice was last updated on 12 April 2022 and the up-to-date version uploaded onto our website on that date. The Privacy Notice for Employees was updated on 11 January 2021 and circulated to all staff on that date. This Privacy Notice is also circulated annually to ensure all staff have an understanding of how RVJB uses their personal information, as well as their rights over their information.</p> <p>The Board's DPO carried out Information Governance training to All Staff in 2021, tailored to the three functions of the Board i.e., domestic/non-domestic valuation and electoral registration, which included training specifically on Data Protection matters.</p> <p>Bespoke training will be carried out in this year by the DPO, similar to the training carried out in 2021.</p> <p>The Senior Manager and Records Manager are members of the SAA Governance Committee who meet regularly to discuss and information share on data protection and other items relating to governance.</p>	<p>Thank you for this update on Data Protection. It is good to hear it remains a standing item of the Governance Working Group, and that the SAA Governance committee regularly discusses matters relevant to data protection.</p> <p>The review and update of RVJB's Data Protection Policy in January 2021, as well as the update of the privacy notices, is noted with thanks.</p> <p>For comments on the training updates, see Element 12.</p>
10. Business Continuity and Vital Records	A	A	G	The Board has not yet adopted the formal <i>Business Continuity Plan</i> which at the time of the assessment is described as 'currently being finalised by the Internal Governance Working Group'. A separate <i>IT Disaster Recovery Plan</i> has also been	As of December 2019, RVJB's entire Virtual infrastructure has been backed up by a Disaster Recovery Supplier, Pulsant, to their offsite cloud-based storage facility. In addition, RVJB's critical servers are also being replicated (via a dedicated fibre link) to Pulsant which will safeguard RVJB in the event of an IT disaster. A formal DR	RVJB have appropriately responded to the gaps in their record recovery provision that they, themselves, previously highlighted. They will now outsource recovery.	RVJB's Virtual infrastructure is backed up by a Disaster Recovery supplier including replication of its critical servers to an offsite location via a dedicated fibre link. This will protect RVJB's data in the event of an IT disaster and or malicious attack.	The Keeper's Model Plan states that an authority's business continuity arrangements should include the recovery of records made temporarily unavailable due to an unexpected event. The

				<p>created and awaits final sign-off. The Keeper welcomes creation of these policies and asks that he has sight of them once approved and operational.</p> <p>The Keeper agrees this element of the Renfrewshire Valuation Joint Board's records management plan under 'improvement model' terms. This means that he recognises that an authority has acknowledged a gap in provision (two vital business continuity policies have not yet been approved) but have put processes in place to close that gap. The Keeper's agreement is conditional of him being provided with fully authorised policy documents as soon as they are available.</p>	<p>plan has yet to be finalised and tested, however this should be completed later in 2020.</p> <p>2018's self-assessment highlighted the issue of accessing Renfrewshire Council's progress server in the event of a disaster. RVJB are currently in the process of moving away from Progress completely, with the Electoral arm of the system having been migrated off Progress in August 2019, and the ND/CT arm planned for late 2020. Therefore, the issue regarding Progress access would be null and void as all our 'core' systems will be protected by Pulsant or accessed via the cloud under software as a service (SAAS).</p>	<p>This solution represents a clear improvement in the records management provision in the authority and the Keeper would be pleased to be informed of this when appropriate.</p> <p>As the staff guidance on the new system, in the form of a accessible plan, has yet to be rolled-out, and the new system is not universally applied, this element remains Amber temporarily. The Assessment Team looks forward to indicating a Green RAG status at the time of the next PUR.</p>	<p>RVJB also continue to conduct an annual Disaster Recovery test which is invoked by RVJB's IT department in order to test recovery times and the overall IT DR plan.</p> <p>The DR Plan, approved by the Management Team in December 2020, is continuously reviewed to ensure the most up to date information/ contact details for relevant personnel are held and to ensure any changes to DR is referenced accordingly. This has been rolled out to appropriate staff members. The DR plan is held on a SharePoint site on the cloud which ensures accessibility and can be distributed easily to all staff if required.</p> <p>RVJB are still in the process of moving away from the Core Valuation System hosted by Renfrewshire Council as the ND/CT arm has not migrated yet but is planned for the latter half of this year and is referenced in Element 4.</p>	<p>update given by RVJB indicates that a Disaster Recovery Plan is now in place and regularly tested. Although RVJB are still moving away from the Core Valuation System, significant improvements in this area have been made.</p> <p>As indicated in the previous PUR, this Element can now be turned from Amber to Green. If this was a formal resubmission, it is likely that RVJB would also be able to obtain a Green RMP status for this Element.</p>
11. Audit Trail	A	G	G	<p>The Board recognise that whilst audit trail functionality is available for electronic records, procedures regarding paper records need to be developed and a logging out sheet will need to be created. These action points will be added to the Internal Governance Working Group's remit. The Keeper is pleased to see the Board's commitment to close the gap in provision under this element and asks for updates as work in this area progresses.</p> <p>The Keeper agrees this element of Renfrewshire Valuation Joint Board's records management plan under 'improvement model' terms. This means that the authority has acknowledged a gap in provision (movement of paper records is inadequately tracked) and has made a commitment to implement a process that will close that gap. The Keeper's agreement is conditional on him being updated as this project progresses.</p>	<p>Laserfiche, RVJB's document management system offers full audit tracking capabilities for all documents stored within its system inventory. For all files and folders stored out with RVJB's DMS, the IT department has set up advanced auditing through Windows server capabilities.</p> <p>The EMS also has full audit tracking capabilities for all documents stored within its system inventory.</p>	<p>RVJB had made marked improvements in the tracking of records (particularly paper) by the time of the last PUR.</p> <p>The Assessment Team thanks them for this further update.</p> <p>It can be accepted that all the public records of the authority are either covered by the new eDRM or by the old shared drives system. Therefore they are happy to indicate a continuing Green RAG status for this element.</p> <p>The Assessment Team also notes that the authority has new line-of-business electronic management system to deal with registration (see element 4). This system has records management functionality including record tracking capability. The Keeper has previously accepted that line-of-business systems may offer appropriate information governance provision without him requiring technical details.</p>	<p>There are no notifiable changes to Arrangements.</p>	<p>Update required on any change.</p>

						The Keeper considers that it remains the responsibility of the authority installing such a system to satisfy themselves that the information held is adequately controlled.		
12. Competency Framework	G	G	G	<p>The Board recognise that staff require further training on the operation of the retention schedule. There is a commitment to providing staff with a 'clear set of rules'. The Keeper commends this commitment and requests a copy of these rules when they become available.</p>	<p>RVJB is committed to training staff in handling and disposing of information safely and securely and ensuring changes to working practices relating to information management are communicated clearly to all staff.</p> <p>The training team meet quarterly to review training needs of all staff and staff are encouraged to highlight areas where they feel training would aid their working practices or contribute to their continued professional development.</p> <p>The DPO and chair of the Governance Working Group meet monthly to review data protection and governance requirements and at these meetings, training needs of staff are discussed to ensure staff are kept abreast of case law and any changes to working practice for records management/information handling.</p> <p>Any changes to the Retention Schedule are communicated to staff and the Schedule is published on our EDMS alongside all RVJB policies. The Schedule is also held on RVJB's website for stakeholders to view.</p> <p>The Electronic Management of Records Policy which has been completed but is currently been adapted to incorporate the electronic management of the documents contained within the EMS, will be notified to staff once finalised with appropriate training delivered simultaneously.</p>	<p>The Keeper expects to see evidence that Staff creating, or otherwise processing records, are appropriately trained and supported.</p> <p>There seems to be ample evidence that information governance training is appropriately considered in the authority.</p> <p>For example, all staff must complete a mandatory online Data Protection course annually. Also all staff to complete an online training course each year on Information Security. The Board's DPO also provided additional training on Information Security in 2019 tailored to the three functions of the Board i.e. domestic/ non-domestic valuation and electoral registration.(see element 8)</p> <p>The PUR make the following statement, "The Records Manager is also supported by Senior Management by being encouraged to attend training courses identified as appropriate." This commitment is to commended.</p> <p>For Records Management policy see element 3 above.</p>	<p>The Board's DPO carried out Information Governance training to All Staff in June and July 2021, which included training specifically on Records Management issues.</p> <p>Training on all aspects of Information Governance (Data Protection, Records Management, Information Security and Freedom of Information) is delivered by the Board's DPO to all New Starts as a matter of standard practice.</p> <p>The Board's DPO carried out a training session specifically for Managers which covered Records Management matters in detail.</p> <p>The DPO is conscious that the updated Records Management Policy now refers specifically to the DPO's responsibility for training staff on Records Management. The DPO is committed to delivering regular training sessions and bulletins for staff to maintain a good level of awareness of Records Management issues amongst staff at all levels.</p> <p>As highlighted previously, the DPO introduced a monthly Think Twice bulletin in January 2021 which is issued to All Staff. This monthly bulletin ensures that key information governance messages are disseminated to all staff on a regular basis, including Records Management issues specifically. Examples of Think Twice bulletins are "The Principles of Good Records Management" and "Retention and Disposal". The DPO has prepared further Records Management guidance for staff which will be circulated over the next few months.</p> <p>The DPO, alongside the Records Manager, is supported by Senior Management to attend courses which</p>	<p>This is a positive update, and shows that RVJB continues to ensure that staff continue to be trained and supported when dealing with specific or general records management-related practice.</p> <p>It is particularly apparent that the Data Protection Officer has been active in carrying out training to all levels of staff and is taking their responsibilities under the RMP seriously in this regard. It is also good to hear that both the DPO and Records Manager are supported to attend training courses in records management.</p> <p>The staff bulletin also seems like a good method to regularly raise the profile of important records management issues.</p>

							will build confidence in dealing with Records Management matters. The DPO attended the National Records of Scotland PRSA Surgery in April 2021 as well as the PRSA Newcomers Surgery in July 2021.	
							The DPO also liaises with the Records Manager for Renfrewshire Council and has asked to be included in any training courses delivered by Renfrewshire Council's Records Manager.	
13. Assessment and Review	G	G	G	The Board is committed to regular reviews of its Plan and have set a provisional date for undertaking the first such self-assessment by October 2016. There are similar plans to review key policies and there will be a constant review of the Business Classification Scheme and Retention Schedule during their implementation. The Keeper applauds these commitments and asks that he is kept informed of these self-assessments, particularly if they result in new policy documents or procedures being introduced.	RVJB's Records Management Plan is a living document and is a standing agenda item on the monthly Governance Working Group meetings. It was reviewed in 2019, in line with the review schedule, by the Records Manager in conjunction with RVJB's DPO and approved by the Governance Working Group.  As previously stated in the PUR carried out in 2018, other standing agenda items of the Governance Working Group are the Records Management Policy, Business Classification Scheme, Retention Schedule, FOI, Data Protection etc and the minutes of the Governance Working Group meetings are also presented at the monthly Senior Management Team Meetings.	It is a requirement of the Public Records (Scotland) Act 2011 that "An authority must— (a) keep its records management plan under review" (PRSA Part 1 5.1.a.)  In their original submission RVJB committed to regularly review their plan and explained to the Keeper the methodology of review and the reporting structure.  The Assessment Team is pleased to acknowledge that this is being done and thanks RVJB for the update regarding the Governance Working Group and their link to the Senior Management Team.	The Records Management Plan was most recently reviewed and updated in October 2021.  The Records Manager has also been working with the Internal Auditors of Renfrewshire Council on the 2021/22 audit of our Records Management arrangements. The finalised report was issued in April 2022 and identified that satisfactory arrangements are in place which ensure adequate progress of the Records Management Plan with only a service improvement recommendation relating to the Plan published on our website.	Thank you for letting us know that the RMP was reviewed and updated in October 2021.  The recent audit of records management arrangements with minimal improvement recommendations is also very positive news, and noted with thanks. In addition to this, the regular participation of RVJB in the PUR process is also commendable.
14. Shared Information	G	G	G	Update required on any change.	All Data Sharing/Processor Agreements have been reviewed to ensure continued compliance with data protection legislation by the Governance Working Group and the DPO. In addition, the DPO has carried out, on behalf of the Board, Data Protection Impact Assessments prior to starting the procurement process for both the EMS and the Disaster Recovery Solution to ensure data protection is at the forefront of our decision making process therefore undertaking 'data protection by design'. A DPIA is also undertaken when a new data sharing requirement is highlighted to ensure any information shared or received is carried out in line with data protection legislation.	At the time of their last PUR Renfrewshire Valuation Joint Board explained that the Governance Working Group was reviewing information sharing agreements. The Assessment Team is pleased to acknowledge that this review has now concluded.  There is plentiful evidence here, and elsewhere in this PUR, that RVJB take the continual review of process seriously. This is to be commended as best practice.  For DPIA see element 9 above.	Information Sharing arrangements are reviewed on a regular basis by our DPO. The template Information Sharing Protocol was reviewed and updated by our DPO (Information Governance Solicitor) and is now used as a default in any information sharing arrangement.	Thank you for keeping the Assessment Team updated on RVJB's Information Sharing arrangements, and the DPO work that has gone into reviewing and updating the template Protocol. It is very good to hear that that continuous review of arrangements, identified as best practice, continues to take place.

## 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 13 April 2022. The progress update was submitted by Lindsey Hendry, Assistant Assessor and Electoral Registration Officer.

The progress update submission makes it clear that it is a submission for Renfrewshire Valuation Joint Board.

### *PRSA Assessment Team's Summary*

The Assessment Team has reviewed Renfrewshire Valuation Joint Board's Progress Update submission and agrees that the proper record management arrangements outlined by the fourteen 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

Renfrewshire Valuation Joint 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 Renfrewshire Valuation Joint 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