

The Public Records (Scotland) Act 2011

Aberdeenshire Council and Licensing Board

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

21st August 2023

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1. Public Records (Scotland) Act 2011

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

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

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

2. Progress Update Review (PUR) Mechanism

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

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

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

3. Executive Summary

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

4. Authority Background

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

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

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

5. Assessment Process

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

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

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

Key:

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

Element	Status under agreed Plan 12NOV15	Progress status 05JUL22	Progress status 21AUG23	Keeper's Report Comments on Authority's Plan 12NOV15	Self-assessment Update 11MAR21	Progress Review Comment 05JUL22	Self-assessment Update as submitted by the Authority since 05JUL22	Progress Review Comment
1. Senior Officer	G	G	G	Update required on any change.	No change.	Update required on any change.	No change.	Update required on any change.
2. Records Manager	G	G	G	Update required on any change.	No change.	Update required on any change.	To be confirmed (currently recruiting). Additional update, August 2023: Ryan Bremner has now been appointed to this role.	The Assessment Team thank you for this notification. An update is required when the new records manager is in post. Comments on the August 2023 Update: Many thanks for this confirmation. Update required on any change.
3. Policy	G	G	G	The Keeper commends the authority's commitment to enhancing their information management through the objectives outlined in the Information and Records Management Strategy and the Council's Digital Strategy. Updates on the success of these strategies would be welcomed.	No change.	Update required on any change.	No change.	Update required on any change.
4. Business Classification	A	A	A	The Council is currently developing a Business Classification Scheme (BCS) based upon the Local Government Classification Scheme (LGCS). Work has already taken place to identify the main functions and classes of records within the authority and the Council have also indicated that they will implement SharePoint to help provide an authority-wide solution to managing their electronic records. The Improvement Plan states that the transfer of files from the shared drives to the file-plan structure will continue till 2017, at which point the Council will be able to draw together a comprehensive BCS.	The migration of records from HP Records Manager 8 (known internally as TRIM/RM8) to SharePoint is now complete. The Council now has five SharePoint sites with multiple libraries and lists for records – the sites are collectively known internally as the ARC (Aberdeenshire's Records Centre). All records have both organisational structure and business classification applied to them, along with other pertinent metadata using Content Types. The migration of shared drive content to appropriate sites within M365 is also in progress. The deadline for switch off of shared drives is December 2022. The Information Governance Officer and records management staff across the services are supporting the work to design architecture within M365, and to identify appropriate destinations for content, including	The Assessment Team thank you for this update, which indicates that good progress has been made. It is positive to hear that shared drive migration is ongoing, that a cut-off date for shared drive use has been set, and that a regular checking-in takes place with regard to M365 implementation, embedding and structuring. The implementation of M365 was bound to complicate matters, which is why this element will remain at Amber until the indicated functionality have been fully implemented and embedded into organisational practices.	Shared drives read-only from 17 th January 2023. Closure planned for 31 st March 2023. Migration work has been progressing well. With services continuing to work with Information Governance team and reps to design and create architecture within M365.	The assessment Team thanks you for this positive update. It is great to hear that shared drives are verifiably no longer in use, and that migration of remaining files onto the new EDRMs, Aberdeenshire's Records Centre (ARC) on SharePoint, is ongoing. That the organisational and functional classification of the migrated files is essential is also positive.

				<p>These endeavours are commended by the Keeper and he requests updates on the progress of the work. He specifically requests sight of the BCS once finalised.</p> <p>The Keeper can agree this element on an 'improvement model' basis. This means that the Council has identified a gap in provision (lack of a comprehensive council-wide BCS) and has identified a solution to close this gap. This agreement is conditional upon the Keeper being kept informed of progress.</p>	<p>the corporate records management SharePoint sites. Progress updates are a standing item at the Information & Records Management Group.</p>	<p>The Assessment Team look forward to hearing how the project progresses in consecutive PURs.</p>	<p>All content within the Aberdeenshire Records Centre (ARC) sites must be classified both organisationally and functionally (both are mandatory pieces of metadata).</p> <p>The Information and Records Management Group and the Data Protection and Freedom of Information Working Group were replaced by a single Information Governance Group in 2022. Shared drive migration continues to be a standing item on the agenda.</p> <p>Additional update, August 2023: The Shared Drive migration project is now complete with shared drives switched off.</p>	<p>While this Element will remain at Amber until the indicated functionality within M365 has been fully implemented and embedded into organisational practices, it is clear that progress continues to be made towards a move to a single EDRM system which will be supported and evidenced by a comprehensive council-wide Business Classification Scheme.</p> <p>The Assessment Team look forward to hearing how the project progresses in subsequent PURs.</p> <p>Comments on the August 2023 Update: Thank you for confirming that the Shared Drive migration has been completed.</p>
5. Retention Schedule	A	A	A	<p>The Council acknowledges that retention schedules are not applied uniformly across the authority, especially in the case of records held on shared drives and bespoke business systems. The adoption of the new EDRMS is expected to help standardise practice. The Keeper would welcome updates on the work being taken in this area.</p> <p>The Improvement Plan states that work to develop a Retention and Disposal Policy will be completed by 2016 and that the new schedules will be rolled out in 2017. There is also a commitment to develop staff training in this area. The Keeper welcomes these</p>	<p>The pandemic and consequent limitation on access to offices has had an ongoing impact on the timely disposal of physical records.</p> <p>This coupled with the recent migration of files relating to the management of physical records from HP Records Manager to ARC SharePoint Lists has resulted in a backlog of work. Services are working through the backlog. It is acknowledged that while this is not ideal, the migration to SharePoint Lists will allow for a smoother and more efficient and more reliable process in the longer term.</p> <p>Staff are slowly returning to offices initially to carry out housekeeping activities, including the disposal of physical records. A schedule of access was arranged across services to allow this work to be done.</p>	<p>Thank you for updating us on difficulties regarding paper records disposal. Aberdeenshire Council and LB have not been alone in this regard during the pandemic. It is positive to hear that this work has now been restarted. That the files governing the physical records are also in the process of being moved from one system to another may complicate matters further and should be done with great care.</p> <p>It is good to know staff have been reminded of the role of archives. Ideally, a functional retention schedule should provide direction in this regard. <i>The Assessment Team would like to know how staff knows which records</i></p>	<p>Current programme to change how we use offices has included housekeeping work. Staff have undertaken significant work around disposal of paper records past retention. There has also been a shift towards digital records, and scanning projects are underway or</p>	<p>The Assessment Team is grateful for this update on Retention Scheduling arrangements, including the continuing use of SCARRS. It is also interesting to hear how ways of working are changing for Aberdeenshire Council and Licensing Board, and the impact this continues to have on recordkeeping practices and procedures in the</p>

				<p>initiatives and requests that the relevant documents and evidence are sent to him once available.</p> <p>The Keeper commends the regular auditing of paper records and would be interested to learn how often these audits are conducted.</p> <p>The Keeper can agree this element on an 'improvement model' basis. This means that the Council has identified a gap in provision (consistent Council-wide use of retention schedules) and has identified measures to close this gap. This agreement is conditional on the Keeper being kept informed of progress in this area.</p>	<p>Staff have also been reminded of the role of the Archives and have been asked to be mindful of records that should be transferred for preservation.</p> <p>With regards to electronic records, the Records365 tool was available within the SharePoint records management sites until end of November 2021, but a decision was made by the EDRMS project board not to roll out Records365, but rather pilot use of enhanced M365 licensing and records management functionality within M365.</p> <p>Pilot will run during 2022 and will cover a limited number of users, mainly within the Health & Social Care Partnership and the Educational Psychology team. The pilot will test the automatic retention, approval, and disposal functionality.</p> <p>Further details provided 29th June 2022, as requested:</p> <p><i>Aberdeenshire council continues to use SCARRS as its functional retention schedule, with records indicated for transfer to the Archives indicated therein. Internal variations on SCARRS are permitted, these variations are held on the corporate intranet alongside links to SCARRS. Proper use of the retention schedules, including records for transfer to the Archives are covered in the corporate records management training and are promoted by records management staff across the council.</i></p> <p><i>Archives staff recently produced a gap analysis of records in SCARRS that had not been transferred to the Archive. This was shared and discussed with service reps. In many cases the records were simply not records created or held by the Council, but for those records which are held work has been ongoing to raise awareness and ensure they are transferred to the Archives at the appropriate time.</i></p> <p><i>Our retention schedules are not yet available in M365 via labels and policies, however this is planned as part of the upcoming pilot work. As noted in the March 2021 PUR, Aberdeenshire Council continues to use SCARRS as its corporate retention schedules for both digital and analogue records. Service variations/addendums are in place where services feel more nuanced, detailed schedules are required, or where there is a different business requirement for retention and / or disposal.</i></p>	<p><i>should be transferred to the archives for permanent preservation.</i></p> <p>Thank you also for the update on M365 project, and the decision not to continue with the Records365 bolt-on. The pilot project running this year should be an interesting exercise, and especially take into account licensing requirements for certain functions. It is important to remember that an underlying policy is still required to make sure retention rules are correctly applied.</p> <p>The Assessment would encourage Aberdeenshire Council and LB to explore both the opportunities and challenges of M365, when it comes to retention schedules and automated processes, possibly with other local authorities who are further in the M365 implementation process.</p> <p><i>While no Retention and Disposal Policy is in place, covering both analogue and digital records, this Element will remain at Amber. Such policy should cover both analogue and electronic records. It is clear, however, that Aberdeenshire Council and LB are making progress in this regard, and we look forward to updates on this in consecutive PURs.</i></p> <p>Comments in response to further details provided 29th June 2022:</p> <p><i>The Assessment Team is very grateful for this update which clarifies Aberdeenshire Council and VB's position.</i></p>	<p>being planned in some services. It is anticipated that this will make management of records that have traditionally been paper-based significantly easier.</p> <p>The use of SCARRS as the corporate retention schedules for both digital and paper records continues with this use reflected in the Information Management Policy.</p> <p>Automated retention and disposal pilot postponed due to migration work and expansion of SharePoint sites.</p>	<p>form of a shift towards digital records.</p> <p>The Team expects that gradual progress continues to be made in line with SharePoint EDRMs implementation.</p> <p>This Element will remain at Amber while the work is ongoing. The Assessment Team look forward to updates in subsequent PURs.</p>
6. Destruction Arrangements	A	A	A	<p>The authority recognises that there is not currently a controlled process for the destruction of electronic records held on shared drives. To improve this situation the Council are committed to developing the</p>	<p>Change in provider of confidential waste disposal. This service is now provided by Restore Datashred. The disposal of confidential waste guidance has been updated to reflect the new provider.</p> <p>Additional new evidence:</p>	<p>Thank you for updating the Assessment Team on the change in confidential waste disposal provider. Thank you also for providing us with a copy of the updated Secure Destruction of Confidential Waste Guidance document.</p>	<p>No change.</p>	<p>Thank you for letting the Assessment Team know that there have been no changes to this Element.</p>

				<p>BCS and retention schedules by 2016.</p> <p>There is a similar issue surrounding records held within the bespoke business systems. The Improvement Plan has identified the need to include retention and disposal functionality when developing specifications for new systems and allying this to the retention schedules.</p> <p>The Keeper commends the Council's efforts to rectify the problems surrounding these digital records and requests updates on progress in these areas.</p> <p>The Keeper would also like sight of a copy or template contract once developed if the Council opt to build records destruction into contracts with third parties.</p> <p>The Keeper can agree this element on an 'improvement model' basis. This means that the authority has identified a gap in provision (the destruction of electronic records held on bespoke business systems outwith TRIM and shared drives) and has shown a commitment to closing this gap over time. The agreement is conditional upon the Keeper being kept informed of progress in this area.</p>	Ev01 Secure destruction of confidential waste guidance	<p>As indicated under Element 4, there is now a deadline for switching off shared drives and moving onto M365, which will hopefully increase the consistency of any retention rules set and implemented. When complete, this will have implications on Elements 5 and 6. The Assessment Team recognise there is still work to be done, but that progress has been made regardless of the challenges posed by the pandemic.</p> <p>This Element will remain at Amber, but we look forward to hearing about further developments in the authority's next PUR.</p>		<p>The Team expects that gradual progress continues to be made in line with SharePoint EDRMs implementation. The Team appreciates that this is a long-term project and likely to take a significant amount of time to implement fully.</p> <p>This Element will remain at Amber while the work is ongoing. We look forward to further updates on progress in this Element in subsequent PURs.</p>
7. Archiving and Transfer	G	G	G	<p>The Keeper commends the Council's development of a digital preservation strategy to ensure that electronic records can be transferred to the archive when appropriate. The Keeper would be interested in seeing this document once it has been finalised.</p>	No change.	Update required on any change.	New Collaboration Agreement to be signed for Aberdeen City and Aberdeenshire Archive Service.	<p>The Assessment Team thanks you for this positive update on Collaboration Agreement review.</p> <p>Update required on any future change.</p>
8. Information Security	G	G	G	Update required on any change	<p>Aberdeenshire Council maintains its PSN Accreditation.</p> <p>The Council has run three incident response tabletop exercises during 2021 with a focus on ransomware and is now reviewing its cyber resilience strategy as part of a wider effort to ensure processes are properly documented.</p> <p>A new Security Compliance Standard is in place for systems, it forms part of the Data Protection Impact Assessment Process.</p>	<p>Thank you for confirming that Aberdeenshire Council continues to be Public Services Network Accredited. <i>The Assessment Team would be keen to know if the Cyber Essentials Plus accreditation is also maintained.</i></p> <p>It is positive to hear that the Council is running tabletop exercises on ransomware and further focusing on strategic cyber resilience. That a new Security Compliance Standard is also operational is good news and will</p>	No change.	Update required on any change.

				<p>Additional new evidence: Ev02 MCOP Acceptable Use - IT Ev03 MCOP IT Asset Management Ev04 Security Compliance Standard</p> <p>Further details provided 29th June 2022, as requested:</p> <p><i>Aberdeenshire Council has not maintained Cyber Essentials Plus as such (although it should be noted that we were assessed under the old regime, so our certificate does not, in fact, have an expiration date). While we align with CE+, our security posture is significantly above the baseline standards set by CE+ and with us meeting the Public Sector Network (PSN) code of connection (reviewed and updated yearly) we did not find there to be any real benefits for maintaining CE+. This is in line with most other Scottish local authorities.</i></p>	<p>undoubtedly strengthen DPIA processes.</p> <p>The evidence provided is noted with thanks.</p> <p>Comments in response to further details provided 29th June 2022: <i>The Assessment Team is very grateful for this update which clarifies Aberdeenshire Council and VB's position.</i></p>		
9. Data Protection	G	G	G	<p>The Keeper commends the thoroughness of the Council's provisions under this element. He would be interested in hearing of any changes to policies and codes of practice following their review by the Information Security Management Group.</p>	<p>Updated Data Protection Policy.</p> <p>Additional new evidence: Ev05 Data Protection Policy Ev06 DPO Annual Report 2021/22</p>	<p>Thank you for letting the Assessment Team know that Data Protection Policy is being kept up to date. Thank you also for providing both the Policy, and the Data Protection Officer's Annual Report, as evidence.</p> <p>Update required on any change.</p>	<p>Review of data protection arrangements underway.</p> <p>Thank you for this positive update on data protection arrangement review which has been noted.</p> <p>Update required on any change.</p>
10. Business Continuity and Vital Records	A	A	A	<p>The Keeper commends the regular testing and review of the Business Continuity Policy (BCP) and the establishment of a series of checklists to ensure that such reviews are carried out in a consistent manner. The Keeper would be interested to learn about the effectiveness of these checklists and whether changes have taken place following these tests and reviews.</p> <p>The Council is developing a procedure for the identification of vital records. The Keeper commends this initiative and requests that he is informed once this development has been completed.</p>	<p>No change.</p> <p>Further details provided 29th June 2022, as requested:</p> <p><i>Vital records continue to be identified and recorded by services when completing the Business Impact Analysis (BIA) Workbook. Within the Workbook these records are referred to as relating to critical activities. Critical information, documentation and IT systems are identified and recorded. BIA Workbooks are signed off by Service Directors and are used to prepare Business Continuity Plans. Business Continuity Plans are updated annually.</i></p>	<p>The Keeper's Assessment Team acknowledges that no changes have taken place since the last PUR. As indicated by the Keeper's original comments in 2015 when this element received its Amber status, the Team would be keen to know what progress, if any, has been made in the procedure for the identification of vital records.</p> <p>This Element remains at Amber.</p> <p>Comments in response to further details provided 29th June 2022: <i>The Assessment Team is very grateful for this update which clarifies Aberdeenshire Council and VB's position.</i></p>	<p>No change.</p> <p>Thank you for letting the Assessment Team know that there have been no changes to this Element.</p> <p>This Element will remain at Amber while the work is ongoing. We look forward to further updates on progress in this Element in subsequent PURs.</p>
11. Audit Trail	A	A	A	<p>The Council has identified that there is little or no audit trail provision for records held within the shared drives. Options are being explored to rectify this situation and it is anticipated that the development of the BCS and full implementation of the new EDRMS</p>	<p>Metadata was successfully preserved in the migration from HP Records Manager to SharePoint, and the audit log from HP Records Manager has been kept and is the responsibility of the Information Governance Officer.</p> <p>The Information Governance Officer now also has access to the M365 Unified Audit Log and there is an</p>	<p>Reliable audit trail arrangements ensure that a complete and accurate representation of all changes that occur in relation to a particular record are maintained. M365 allows for the automated maintenance of such audit trails with regard to digital records in the system, so it is good to hear this is</p>	<p>No change.</p> <p>Thank you for letting the Assessment Team know that there have been no changes to this Element. The Team expects that gradual progress continues to</p>

				<p>will remedy this. The Keeper requests that he is kept informed of this work as it progresses.</p> <p>The Keeper would also be interested in receiving updates on how services without the bespoke systems are able to track the movement of paper records held onsite.</p> <p>The Keeper can agree this element on an 'improvement model' basis. This means that the Council has identified a gap in provision (lack of audit trail provision in shared drives) and has identified a solution to close this gap. This agreement is conditional upon the Keeper being kept informed of progress.</p>	<p>identified process for downloading audit logs for the corporate records management SharePoint sites, so they can be kept for longer than the standard 90-day (or 1 year) retention within M365.</p> <p>Naming conventions updated for SharePoint use.</p> <p>Additional new evidence: Ev07 File naming conventions</p> <p>Further details provided 29th June 2022, as requested:</p> <p><i>Movements of records stored in the offsite facility are fully traceable with a record of when such records were received, when they were stored, who has requested a retrieval and when, return of records, and destruction. Paper records sent to offsite storage are tracked via Oasis Bridge and by use of customised SharePoint Lists within our ARC Records Management SharePoint sites.</i></p> <p><i>When using our onsite closed record storage facility, all content must be catalogued and entered into an inventory. Barcodes should be placed on both individual files and boxes. The inventory also has an activity log which tracks access to files/boxes.</i></p> <p><i>Methods of tracking and audit of paper records vary between business areas, for example tracer cards are used in Housing and Social Work, and a log sheet is used for personnel records.</i></p>	<p>being implemented, and that shared drives will be retired at the end of 2022. The migration from HP Records Manager is also noted with thanks; these audit logs are important to verify the authenticity of migrated records.</p> <p><i>The Assessment Team would like to check if there have been any developments with regard to paper record audit trails.</i></p> <p>Robust file naming conventions are key to the discoverability of records; the receipt of this updated document is noted with thanks.</p> <p>This Element will remain at Amber until the new EDRMs, M365, has been fully incorporated into the authority's records management practices and processes. This is unlikely to be a straightforward or quick process, but the Team look forward to updates in consecutive PURs.</p> <p>Comments in response to further details provided 29th June 2022: <i>The Assessment Team is very grateful for this update which clarifies Aberdeenshire Council and VB's position.</i></p>		<p>be made in line with SharePoint EDRMs implementation. The Team appreciates that this is a long-term project and likely to take a significant amount of time to implement fully.</p> <p>This Element will remain at Amber while the work is ongoing. We look forward to further updates on progress in this Element in subsequent PURs.</p>
12. Competency Framework	G	G	G	<p>The Keeper welcomes the range of staff training put in place by the Council and would be interested to hear of any further developments following reviews of the information management training by the Records Management Group.</p> <p>The Keeper would also like to receive updates of the review of training programmes following the implementation of the new EDRMs.</p>	<p>Training videos on use of the ARC records management SharePoint sites are available to all users of the sites.</p> <p>The mandatory Data Protection training has been expanded to include training on Freedom of Information.</p> <p>Freedom of Information training is being provided to key service reps in April 2022.</p>	<p>Thank you for this update on staff competency framework with regard to records management matters. It is reassuring to hear that all staff receive Data Protection and FOI training, in addition to training on ARC records management SharePoint sites. Especially with Freedom of Information requests, it is important that staff recognise a request when it comes into any part of the organisation, and forwards it to the appropriate team without delay. It is reassuring this is now part of mandatory training, and that more in-depth training has now also been provided to key service representatives.</p> <p>Update required on any change.</p>	No change.	Update required on any change.
13. Assessment and Review	A	G	G	<p>The Council have committed to annually reviewing the RMP, although the self-assessment methodology for carrying this out has yet to be determined. It is anticipated that the basis for</p>	<p>Annual completion of the assessment template has again been carried out, and discussion of the Records Management Plan and improvement work is a standing item on the Information & Records Management Group agenda.</p>	<p>Thank you for this update. Aberdeenshire Council and LB should be commended for their continuing participation in the Progress Update Review process.</p>	Fortnightly migration meetings ceased in 2022, replaced by standing item on	The Assessment Team thanks you for this update. It is good to know that IG Group continues its oversight

				<p>carrying out the reviews will be The Improvement Plan, with any major issues being referred to Internal Audit for further investigation. The Keeper commends this approach and would like to hear of the work being done in this area.</p> <p>The Keeper can agree this element on an 'improvement model' basis. This means that the Council has identified a gap in provision (lack of a self-assessment mechanism) and has identified a solution to close this gap. This agreement is conditional upon the Keeper being kept informed of progress.</p>	<p>The previous year's assessments by services resulted in the identification of areas for improvement, such as new guidance and internal promotion of the archive and its role, which have been acted on and are a matter of ongoing improvement.</p> <p>Fortnightly meetings to review progress on the EDRMS migration, the pilot of records management functionality within the ARC SharePoint sites, and the shared drive migration. Meetings are chaired by the Information Governance Officer and attended by records management reps and other staff involved in the work.</p>	<p>It is great to hear that Aberdeenshire Council and Licensing Board are using the process as an internal improvement tool.</p> <p>In addition, it is good to hear that Records Management Plan and relevant matters remain a standing agenda item for the Records Management Group, and that EDRMs migration, ARC SharePoint functionality and shared drive migration are all regularly receiving consideration.</p> <p>Update required on any change.</p>	<p>Information Governance Group agenda and shared Microsoft Teams space.</p> <p>Internal Audit completed December 2022.</p>	<p>on the migration project, albeit in different format.</p> <p>The completion of an internal audit is also very welcome news and noted with thanks. It is assumed that this will result in appropriate action points and in due course.</p> <p>Update required on any change.</p>
14. Shared Information	G	G	G	<p>The Council is a partner in a high-level Memorandum of Understanding (MoU) which is currently being revised due to the superseding of Grampian Police by Police Scotland. The Keeper requests a copy of the updated MoU once it has been finalised.</p>	<p>No change.</p>	<p>Update required on any change.</p>	<p>No change.</p>	<p>Update required on any change.</p>

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

Version

The progress update submission which has been assessed is the one received by the Assessment Team on 22nd March 2023. The progress update was submitted by Ruth O'Hare, Legal Service Manager (Governance).

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

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

General Comments

Aberdeenshire Council and Licensing Board 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 Aberdeenshire Council and Licensing Board continue to take their statutory obligations seriously and are working hard to bring all the elements of their records management arrangements into full compliance with the Act and fulfil the Keeper's expectations.

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

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



Iida Saarinen
Public Records Officer