The Public Records (Scotland) Act 2011

Fife Council and Fife Licensing Board

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

7th June 2019

1

A24676418 - NRS - Public Records (Scotland) Act (PRSA) - Fife Council and Licensing Board - Progress Update Review (PUR) - 2018 Final Report

Contents

1. Public Records (Scotland) Act 2011

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

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

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

2. Progress Update Review (PUR) Mechanism

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

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

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

3. Executive Summary

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

4. Authority Background

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

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

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

5. Assessment Process

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

The assessment report considers statements made by an authority under the elements of its agreed Plan that included improvement models. It reflects any changes and/or progress made towards achieving full compliance in those areas where agreement under

improvement was made in the Keeper's Assessment Report of their RMP. The PUR assessment report also considers statements of further progress made in elements already compliant under the Act.

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

Key:

| 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. |

6. Progress Update Review (PUR): Fife Council and Fife Licensing Board: FEBRUARY 2019

Element	Status of elements under agreed Plan, November 2014	Status of evidence under agreed Plan, November 2014	Progress assessment status, 2019	Keeper's Report Comments on Authority's Plan, November 2014	Self-assessment Update as submitted by the Authority (on progress since November 2014)	Progress Review Comment, 2019
1. Senior Officer	G	G	G	Update required on any change	No change in nominated post or named individual.	No immediate action required. Update required on any future change.
2. Records Manager	G	G	G	Update required on any change	Change in nominated post to that of Records Manager. The Records Manager reports to the Lead Officer, Security and Compliance. The Lead Officer, Security and Compliance, reports in turn to various management positions and boards, including the ICT Governance Board and to SIRO. The Records Manager also reports to the Information Governance Working	The Assessment Team thanks Fife Council for this update which we have noted.

					Group (IGWG) which includes operational manager representation from across the Council. Change in named individual to Meic Pierce Owen- who is the Records Manager.	
3. Policy	**G**	**G**	**G**	Update required on any change	The current version of both the Information Management Strategy and Records Management policy date from 2016 and are due for review in 2019 (see evidence documents FCPUR2019-01 and FCPUR2019-02). The rollout of MS SharePoint (SharePoint) continues in SP2013 (see evidence document FCPUR2019-03). Over the course of 2019, it is planned to migrate current SharePoint provision to MS Office 365 (Office 365). The Council will report further on this work in its February 2020 PUR.	In their original submission Fife Council committed to updating relevant policy documents on a regular basis. The Assessment Team appreciates the confirmation that this is being done. The Assessment Team acknowledge the receipt of updated strategy/policy documents which they have retained in order that they may keep the Fife Council submission up-to-date. The roll out of the SharePoint solution is bound to be incremental and further time must be allowed for it to bed in and become fully operational.

						The Assessment Team acknowledges the planned migration. They look forward to being kept updated on this work in subsequent PURs.
4. Business Classification	A	G	A	The Business Classification Scheme (BCS) is currently being rolled out across the different service areas as part of a major redevelopment of records management systems based around the use of SharePoint 2013. The Keeper agrees this element on 'Improvement Model' terms. This means that	Deployment of the BCS continues in the manner detailed as part of the Council's SharePoint Project (see evidence documents FCPUR2019-03 and FCPUR2019-04). This work is carried out under guidance from the Records Manager.	The Assessment Team thanks Fife Council for an update on the Council's SharePoint project. The roll out of the SharePoint solution is bound to be incremental and further time must be allowed for it to bed in and become fully operational.

9

A24676418 - NRS - Public Records (Scotland) Act (PRSA) - Fife Council and Licensing Board - Progress Update Review (PUR) - 2018 Final Report

	🟧	🟩	🟧	he is convinced of the authority's commitment to implement the BCS fully over time, but would request that he is updated as this project progresses. Fife Council have suggested that they provide an update every 6 months to alert the Keeper to progress. The Keeper welcomes this.	In addition, the Council has developed its Information Asset Register (IAR) provision. (see element 10; see evidence document FCPUR2019-05). The IAR is in the process of being reviewed and developed further. The Council will report further on this work in its February 2020 PUR.

This work is being carried out by the Records Manager.

Responsibility for the management of the Council BCS and IAR now rest with the Records Manager. | This element remains at 'amber' for the moment as the work progresses.

The Assessment Team commends the commitment of time and resources to this major improvement project. They look forward to being kept updated on this work in subsequent PURs.

The Assessment Team thanks Fife Council for the update regarding the expanded role of the Records Manager (see element 2) which we have noted.

The Assessment Team acknowledge the receipt of updated reports and examples of their Information Asset Register, and business classification documents. The Team have retained these in order that they may keep the Fife Council submission up-to-date. |

10

A24676418 - NRS - Public Records (Scotland) Act (PRSA) - Fife Council and Licensing Board - Progress Update Review (PUR) - 2018 Final Report

	<td style="background:orange"></td>	<td style="background:green"></td>	<td style="background:orange"></td>			The Assessment Team acknowledges the planned Information Asset Register development. They look forward to being kept updated on this work in subsequent PURs.
5. Retention Schedule	**A**	**G**	**A**	The retention schedule is being revised at time of submission using the well regarded *SCARRS* system. The Keeper commends the functional approach being adopted in the new system. The retention schedule will be imposed on the shared drives as the SharePoint solution is rolled out through the authority. The Keeper agrees this element on 'Improvement Model' terms. This means that he is convinced of the authority's commitment to implement the revised Retention Schedule fully over time, but would request that he is updated as this project progresses. Fife Council has suggested that they provide an	Deployment of the Council Records Retention Schedule (retention schedule) continues in the manner detailed as part of the Council's SharePoint Project (see evidence documents FCPUR2019-03 and FCPUR2019-06). This work is carried out under guidance from the Records Manager. As SharePoint is being deployed, records stored on the network drives (drives) are being migrated into SharePoint ahead of the decommissioning of these drives. As part of the migration process, records are surveyed and, where records are found to be out	The Assessment Team acknowledge the receipt of updated retention schedule. The Team have retained these in order that they may keep the Fife Council submission up-to-date. The Assessment Team thank Fife Council for the update regarding using the SharePoint project (see element 4) as a prompt to revisit previous retention decisions. This is a recognition that a Retention Schedule is a 'living document' as does the consideration of permanent retention decisions in light of lessons learned by the child abuse and other

	🟧	🟩	🟧	update every 6 months to alert the Keeper to progress. The Keeper welcomes this.	of retention, they are reviewed for on-going live business value ahead of full disposition being carried out. A change in retention practice currently being introduced is to look to select for permanent preservation those strategy, policy and procedure documents – and in particular those relating to sensitive service areas. This is taking on board the learning from the Scottish Child Abuse Inquiry (SCAI) and similar inquiries elsewhere of the need for the Council to be able to evidence 'why something was done when it was done.' Responsibility for the management of the Council Records retention Schedule now rests with the Records Manager.	enquiries. This is to be commended. This element remains at 'amber' for the moment as the SharePoint project and shared drive decommissioning progresses. They look forward to being kept updated on this work in subsequent PURs.

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6. Destruction Arrangements	**G**	**G**	**G**	Update required on any change	Arrangements for the destruction of paper and electronic records remain unchanged. The Council's use of RecordPoint is currently under review. The outcome of this review will an onward solution for the management of paper and electronic records disposition in Office 365. The Council will report further on this work in its February 2020 PUR. Paper records storage arrangements have developed with the opening (in 2017) of Council internal semi-current record and archive record stores in the Council's Bankhead facility (Bankhead). These comprise full archive provision (see below, element 7) together with a semi-current 'archive' store for Council Records in	No immediate action required. Update required on any future change. The Keeper acknowledges the statement regarding the Scottish Child Abuse Enquiry. Furthermore he accepts that this, temporarily, takes precedence over implementing retention decisions. The Assessment Team thank Fife Council for the information regarding the Bankhead record store. The Team were pleased to be given access to this facility recently and agree that it is entirely suitable for the purposes explained. The Assessment Team thank Fife Council for the information about their scanning project and they look forward to being kept updated on this

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general and a dedicated semi-current and permanent preservation store for social care records. Each of these stores is operated by distinct dedicated teams (see element 8 and element 12).

In 2017, the Project Team responsible for the development of this in-house records storage solution received the IRMS Team of the Year Award.

The Council is currently developing a programme for the back-scanning of current and semi-current paper records along with the introduction of electronic mailroom and the routine scanning of incoming paper records (please see evidence document FCPUR2019-07). It is planned that all scanning will be to permanent preservation-compatible PDF/A format.

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programme in subsequent PURs. They acknowledge they have received a copy of the *Document Management-Scanning Positional Paper* in evidence.

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14

A24676418 - NRS - Public Records (Scotland) Act (PRSA) - Fife Council and Licensing Board - Progress Update Review (PUR) - 2018 Final Report

| | | | | | The Records Manager is involved in this work.

It is planned that paper original records will be destroyed after being scanned and after an appropriate period has elapsed and appropriate checking of the scanned records has taken place. Within this framework, it is planned to include provision for the preservation of paper documents of enduring evidential value. Examples of these would be Social Care file personal documents defined as 'cherished items'. Such items might include letters from family members or photographs. In looking to do this, the Council is conscious of the learning coming out of SCAI and other such Inquiries elsewhere with regards the sensitive treatment of records relating to an individual's 'journey'. | |

					The Council will report further on this work in its February 2020 PUR.	
7. Archiving and Transfer	**G**	**G**	**G**	Update required on any change	Arrangements for the appraisal, selection, transfer and onward archival management of records remain substantively unchanged. Changes have taken place in: 1/ roles and responsibilities with responsibility for managing and promoting appraisal and selection now resting jointly with the Archives and Local Studies Team Leader (the Archivist) and the Records Manager. This joint-responsibility, which is currently an agreed arrangement between the named individuals, will be formally set out in the revised Council Records Management Policy (see element 3.)	No immediate action required. Update required on any future change. However, the Assessment Team notes the consideration of the permanent retention of 'paper documents of enduring evidential value', including 'cherished items', described in element 6 above. This is to be commended (particularly in light of the background to the Act) The Assessment Team thank Fife Council for the information regarding the Bankhead archive. The Team were pleased to be given access to this facility recently and agree that it is entirely suitable for the purposes explained

					2/ the location of the Council Archive which, in 2016, moved into a new dedicated facility in Bankhead.	
8. Information Security	G	G	G	Update required on any change	Current provision is summarised in evidence document FCPUR2019-08 with further detail provided in evidence documents FCPUR2019-09 to FCPUR2019-13. Provision is managed by a dedicated Information Security Team (2 individuals) working under the Lead Officer, Security and Compliance. The Records Manager is involved in this work as part of a coordinated approach to Information Governance (IG) provision.	An *Overview Report* regarding information security, from the Council's Information Security Specialists, has been supplied to the Assessment Team. This provides an update on latest developments and the Team thank Fife Council for supplying this. They have retained this in order that they may keep the Fife Council submission up-to-date. The Assessment Team also acknowledge receipt of an new version of the *Information Security Policy* (v7.2) and other information security guidance and policy documents. In their original submission Fife Council committed to updating relevant policy documents

						on a regular basis. The Assessment Team appreciates the confirmation that this is being done.
9. Data Protection	**G**	**G**	**G**	Update required on any change	Current provision is summarised in evidence document FCPUR2019-14. This document includes a link to relevant policy documentation. Provision is managed by a dedicated data Protection Team (2 members) working under the Council Data Protection Officer (DPO)- which is a dedicated post. The Records Manager is involved in this work as part of a coordinated approach to IG provision.	As with all other Scottish public authorities Fife Council have been required to review and update their data protection procedures in light of the 2018 legislation. The Assessment Team acknowledges that the public facing Fife Council website has been updated appropriately: https://www.fifedirect.org.uk/topics/index.cfm?fuseaction=service.display&p2sid=27029554-BBE9-4F59-9F50-BDD9545062E7 The Assessment Team also acknowledge receipt of a *Summary Report* of the Data Protection provision in Fife Council

						from the Council's DPO Fiona Stuart. This provides an update on latest developments and the Team thank Fife Council for supplying this. They have retained this in order that they may keep the Fife Council submission up-to-date.
10. Business Continuity and Vital Records	G	G	G	Update required on any change	No change in arrangements. The Records Manager is in contact with the relevant officers.	No immediate action required. Update required on any future change.
11. Audit Trail	A	G	A	The roll-out of SharePoint will greatly enhance audit function relating to electronic records whilst the creation of a centralised records store in a new repository will help in the tracking of paper records. The Keeper commends these	Where SharePoint has been adopted, enhanced audit function relating to electronic records is in place. In addition, audit trail provision is now assessed	Audit Trail/document tracking is improving in Fife Council in several areas detailed in the previous column. The Keeper thanks the Council for the update on progress.

				initiatives and requests updates on these developments.

The Keeper agrees this element on 'Improvement Model' terms. This means that he is convinced of the authority's commitment to implement systems to track and identify records fully over time, but would request that he is updated as this project progresses. | as part of the Data Protection Impact Assessment (DPIA) process relating to the provision of IT systems and IT Cloud Services (tech provision) that process personal data. A number of such DPIA documents are have been prepared as part of contracts that are yet to be fully signed off. As such, the documents are viewed as draft at this time. The Council will report further on this work in its February 2020 PUR.

Over the coming year, it is hoped to integrate audit trail requirements into the Council's procurement process for all tech provision. The Council will report further on this work in its February 2020 PUR.

Turning to paper audit trail provision, enhanced provision is being introduced within the Council's Social Care Services. The Council will | As previously stated the roll-out of the SharePoint solution will enhance the tracking of digital records and the Assessment Team acknowledges that this roll-out is progressing satisfactorily (see element 4). They look forward to being kept updated on this programme in subsequent PURs.

Similarly, they look forward to an update on the processes being put in place for creating an audit trail for paper records and note that the pilot Social Care has progressed well.

This element remains at 'amber' for the moment as the work progresses. |

					report further on this work in its February 2020 PUR	
12. Competency Framework	**G**	**G**	**G**	Update required on any change	In terms of the competency framework for the Records Manager, the Council recruited the current Records Manager in 2017 with the requirement of a post requirement of either a recognised post-graduate qualification and/or professional accreditation. The current post-holder holds both such a	The Assessment Team notes that Fife Council employs a full-time, highly qualified records manager. The PUR makes it clear that this individual has input to all elements of the Records Management Plan. The Council's approach to this issue is to be commended.

| | | | | | qualification and professional accreditation.

Looking wider, the Council is currently developing a co-ordinated approach to Records Management Training.

Forming part of an integrated programme of IG training designed to give staff the skills needed to work with information, this will be a tiered approach similar to that adopted in Data Protection. The purpose of this training will be to match IG training requirements to the level of information-related work being undertaken by staff.

Under this framework, it is envisaged that there will be three levels of training required- each of which will have its own competency framework.

Detail of this provision are in development but it is | Similarly the resources allocated to information governance training for all relevant staff seem to be improving. Although the 'co-ordinated approach to records management training' is still in development the Assessment Team regards this as a positive step and looks forward to an update on this in subsequent PURs.

If this were a formal submission the Keeper would request sight of samples of this training as evidence. |

					likely to have three levels operating along the lines of 1. General- applying to all staff 2. Enhanced- applying to roles with specific records management responsibilities 3. Professional- applying to roles requiring profession-level records management skills. The Council will report further on this work in its February 2020 PUR.	
13. Assessment and Review	**G**	**G**	**G**	The authority will review the RMP annually with a major review every three years. The Keeper commends this approach and would welcome updates on the findings of any reviews or internal audits.	In April 2016, the Council submitted a formal update report to the Keeper (see evidence documents FCPUR2019-15 and FCPUR2019-16). Since May 2017, and in anticipation of engaging in the annual PUR process, the Keeper has been regularly updated verbally on progress.	Fife Council have been exemplary in keeping the Keeper informed of progress in the implementation of their agreed plan and of information governance developments in the Council. This engagement to be highly commended. The completion of this Progress Update Review

					The Council is engaged in the annual PRSA PUR reporting process.	can also be considered as evidence of the commitment to review committed to in the original submission.

The Council is engaged in the annual PRSA PUR reporting process.

Over the coming year, it is planned to review the current Council RMP following the conclusion of the current PUR process. and taking on board the Keeper's comments arising from this process. It is also planned that this review will take place after the publication of the forthcoming revisions to the Keeper's Model Plan guidance.

It is envisaged that this review will lead to the production and submission of a revised RMP. It is planned that this revised RMP will be formatted to reflect a strategic 'outcomes' framework with 'actions over the coming year' and a 'review of progress over the past year' being recorded and reported to the Keeper via

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can also be considered as evidence of the commitment to review committed to in the original submission.

The Keeper notes the Council is considering re-submitting formally under section 5 of the Act. This is welcomed. However, it would be worth contacting the Assessment Team in advance to discuss what is required of an authority who chooses to do this. (The Assessment Team will also be happy to put Fife Council's Records Manager in touch with his opposite number in another local authority who has already been through the voluntary re-submission process)

	 	 	 		the annual PUR Report. It is planned that the revised RMP includes the proposed 'Element 15- third party compliance.' It is envisaged that the revised RMP will be developed and submitted to the Keeper over the course of 2019.	
14. Shared Information	**G**	**G**		Update required on any change	Development of provision has continued in accordance with that set out in the RMP. The Council's Information Sharing Protocol (ISP) provision is extensive. This provision includes strongly-developed provision across the Fife Health and Social Care Partnership (see evidence document FCPUR2019-17). This provision is managed by the Council DPO (see element 9). The Records	The Assessment Team thanks Fife Council for this update. The Assessment Team acknowledge the receipt of a copy of the *Information Sharing Agreement* between Fife Council, NHS Fife and the Fife Integration Joint Board dated March 2018. The Team agree this properly considers information governance issues when the Council engages in data sharing with its partner bodies under this mechanism.

| | | | | | Manager is involved in this work as is appropriate.

Over the coming year, the Council will be further strengthening its ISP provision and looking at the information sharing opportunities offered, and challenges posed, by the move to Office 365. The Council will report further on this work in its February 2020 PUR. | The Assessment Team have stored their copy of the *Information Sharing Agreement* in order that they may keep the Fife Council submission up-to-date.

As with other elements above, the Assessment Team looks forward to updates on the SharePoint/365 project in subsequent PURs. This would, of course, include any updates on data sharing provision. |

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 28th February 2019. The progress update was submitted by Meic Pierce Owen, Fife Council Records Manager.

The progress update submission makes it clear that it is a submission for Fife Council (including the Assessor) and Fife Licensing Board.

The Assessment Team has reviewed Fife Council and Fife Licensing 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

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

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

Under a voluntary submission the Keeper cannot change the status of elements that have been formally agreed, but he can use such submissions to indicate how he might regard this status should the authority choose to resubmit its plan under section (5)(6) of the Act.
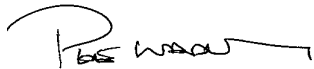
Where 'no change' has been recorded under the update on provision by the authority, the Assessment Team is happy to agree that these elements require no further action for the time being.

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

Based on the progress update assessment the Assessment Team considers that **Fife Council and Fife 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,

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Pete Wadley
Public Records Officer