The Public Records (Scotland) Act 2011

West Lothian Council and West Lothian Licensing Board

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

7th February 2020

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

4. Authority Background

Local government in Scotland comprises 32 unitary local authorities, responsible for the provision of a range of public services. West Lothian Council (WLC) is one of these authorities http://www.westlothian.gov.uk/ It provides services to the people of West Lothian, such as education, social care, waste management, cultural services and planning.

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. West Lothian 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.

Progress Update Review (PUR) Template: West Lothian Council and West Lothian Licensing Board

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1. Senior Officer	G	G	G	G	Update required on any change	Since the RMP was agreed Senior Management responsibility for the Records Management Plan was changed to Julie Whitelaw, Head of Corporate Services and notified to the Keeper in 2014. There are no notifiable changes for 2016-17.	No immediate action required. Update required on any future change	There are no notifiable changes since the last review.	No immediate action required. Update required on any future change.
2. Records Manager	G	G	G	G	Update required on any change	There are no notifiable changes for 2016-17.	No immediate action required. Update required on any future change	There are no notifiable changes since the last review.	No immediate action required. Update required on any future change.
3. Policy	G	G	G	G	Update required on any change	The Records Management Policy and associated guidance were reviewed in September 2016. The policy was approved by council April 2017. There are no changes to be notified to the Keeper. Link to Policy: West Lothian Council's Records Management Policy Examples of updated guidance are provided in **Appendix A**.	Policy supplied in support of the update statement and confirmation that the RM policy and associated guidance is subject to regular review. The examples of Guidance provided to staff are comprehensive and thorough. They set out arrangements for record, regardless of format, and include reference to records of historical importance. Given the background the Act this is an important inclusion. No immediate action required. Update required on any future change.	The Records Management Policy has been replaced by a new Information Governance Policy and is a notifiable change to arrangements. The new Policy was approved by the Council Executive on the 25th of June 2019 and replaces the following: • Information Security Policy; • Data Protection Policy; • CCTV Policy; • Records Management Policy; • Archives Acquisition Policy. Following the introduction of the new policy, associated procedures and guidance have been reviewed and updated.	The Assessment Team notes that the authority has a new governance document which is publically available at: https://www.westlothian.gov.uk/article/33222 /Information-Governance This Information Governance Policy replaces the Records Management Policy agreed by the Keeper in 2013. As a fundamental building block of records management provision in the Council, the introduction of the Information Governance Policy has prompted a review of the Council's agreed Records Management Plan (RMP). The Assessment Team has received *West Lothian Council Records Management Plan 2019*. This is version 2.4. This document will be retained in order that the Council's submission can be kept up-to-date. It is supported by a *Covering Letter* from the

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								The Records Management Framework and guidance are attached as **Appendix A** as evidence. The governance arrangements for the new policy have been updated and detailed at the end of the policy document. The notifiable changes to previous arrangements are: 1. The Information Management Working Group now meets Bi-Monthly (every two months). 2. The councils Governance and Risk Board have replaced the ICT Programme Board within the governance arrangements and meet on a quarterly basis. 3. The ICT Programme Board have been removed from governance arrangements. In addition, the 'Principles' section in the council's Records Management Plan have been updated in line with the new Information Governance Policy. The councils Information Strategy was concluded on 01st of June 2018 at the Partnership and Resources Policy	Council's Head of Corporate Services which will also be retained. The Assessment Team also acknowledge the receipt of the *Records Management Guidance Framework.* This is the version dated March 2019. This document will be retained in order that the authority's submission can be kept up-to-date. Thank you for the update around new governance arrangements these have been noted. The Assessment Team also notes that changes to information governance arrangements have been appropriately publicised on the Council website. The Keeper would commend the practice of keeping service users aware of information governance/records management provision in the Council. With both a new Information Governance Policy and a new version of the Records Management Plan now in place, West Lothian Council and Licensing Board should consider a formal re-submission to the Keeper. PRSA says at section 5.6 "An authority may at any time revise its records management plan and submit the revised plan to the Keeper for agreement." If WLC is considering a formal re-submission please contact the assessment team to discuss what evidence would need to be supplied public_records@nrscotland.gov.uk We will fully engage and support a section 5 re-

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								Development and Scrutiny Panel and is a notifiable change. Details of the council meeting are provided in the link below: https://coins.westlothian.gov.uk/coins/submissiondocuments.asp?submissionid=38812 The Council's commitment to effective records management is set out in the corporate Information Governance Policy and in the councils Improvement Strategy.	submission. Happy to talk through the process at any time.
4. Business Classification	G	G	G	G	Update required on any change. The Keeper notes that detailed and appropriate file plans exist for activities not included in the EDRMS. The Keeper would like to hear whether such file plans have since been accommodated within the EDRMS.	Since the RMP was agreed the council has embarked on a replacement to the current (Meridio) electronic document and records management system (EDRM) with the Objective eRDM system. Objective is used throughout the Scottish Government. Due to significant changes, current versions of file plans are notified to the Keeper as **Appendix B**. Details are provided for the applicable retention rules, data labels and vital records. NB: File plans for Legal Services, Revenues and Education are currently under major reconstruction and therefore draft versions are provided as evidence of these. The council is currently migrating file plans from the current EDRMs to the new system. Cross reference tables are provided to evidence the controlled migration from	This is a major undertaking for the authority. It is commendable that the authority is resourcing this vital development work to further safeguard its public records. File plans being supported by the new system are submitted in evidence and are undoubtedly comprehensive and fit for purpose. As shown in the column to the left, the authority indicates that on submission file plans for Education and Revenues and Legal Services remained in draft. The Assessment team therefore graded this element 'Amber' as being under improvement. Responding to the Interim Report the authority was able to confirm that these outstanding file plans had been agreed and were now operational. Evidence was	Since the RMP was agreed the council has successfully replaced the Meridio EDRMs with the Objective ECM system. Attached in **Appendix B** are examples of file plans and disposal rules in place within the ECM. The management of records within the business classification scheme, in the ECM system is subject to ongoing monitoring and annual review to ensure that all of the functions, activities and transactions carried out by the council continue to be represented. During the period since the last review, the council embarked on a GDPR Programme which included a review of the council's Information Asset Register. An example of the updated Information Asset	In previous updates West Lothian Council have indicated that they were pursuing a change to the eDRM solution in which their public records are managed. The Assessment Team acknowledge that this action has now been completed and the Council's records are now managed through the Objective system. The Keeper would recognise that Objective is a suitable records management system for a large organisation (it is currently that employed by the Scottish Government – and the NRS). The Assessment Team acknowledge the receipt of examples of *File Plans and Disposal Rules in Place* froom the new system. The introduction of GDPR in May of 2018 prompted public authorities to implement or review an Information Asset Register (at least as far as it related to records holding personal information). The Assessment Team acknowledges that West Lothian

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						one system to another (**Appendix C**). Migration has been tested and is due for completion by the end of 2017. The management of records within the business classification scheme, in the new system will be subject to ongoing monitoring and annual review to ensure that all of the functions, activities and transactions carried out by the council continue to be represented. The scheme in the new system will still be based on the LGCS (Local Government Classification Scheme). The design and migration documents for the new EDRM system are provided as Appendix D & E respectively)	supplied in support and included the agreed file plans for Education and Revenues and Legal Services. This was accompanied by a useful cross-match with the LGCS showing compliance with industry standards.

Additional evidence to do with the design and implementation of the new system and the reliability of the migration exercise was provided and is without doubt.

The assessment team applauds the work of the authority in resourcing this major transition and ensuring its implementation is robust.

Update required on any future change. | Register is attached as **Appendix C**.

The council have committed to a reduction in the use of the Storage Area Network (SAN) within the ICT Strategy of 50%. File Plans will be accommodated in the councils ECM system, where possible. | Council has done this and they have received of an extract from the WLC *Information Asset Register*. |
| 5. Retention Schedule | **G** | **G** | **G** | **G** | Update required on any change | The council review retention schedules on an ongoing basis. The current retention schedules are being reviewed with a view to applying these in the new EDRM system. Examples of how these are being developed for the EDRM system are provided in Appendix F.

Application of the above is evidenced in the file plans (Appendix B). In addition, the council have developed a 'Procedure for Managing Legal Holds' (see Appendix G). This procedure sets out the arrangements to | Current retention schedules are being reviewed in line with the authority's operational policy, but also to accommodate their inclusion under the new EDRMs. This is a sensible approach. Evidence supplied under appendices B and F detail the development and application of the revised retention schedules under the new system. The retention periods against record classes remain in place and continue to be action, so no change is recorded here, in effect. The authority further | The council have implemented disposal rules in the ECM system. Examples of disposals in action within the ECM system are provided in **Appendix B**.

The council's retention schedules continue to be regularly reviewed. The keeper will be notified of any significant changes. | The Assessment Team recognise that the Objective system (see element 4 above) imposes automatic retention decisions on record types and agrees that this should work well for West Lothian Council.

There is a recognition in the PUR that a retention schedule is a 'living document' and will be subject to continual minor change year on year. |

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						'preserve' records where required to provide evidence, such as, an inquiry, court case, fraud investigation etc. The Keeper will be notified of any further significant changes.	supplied evidence of a newly developed 'Procedure for Managing Legal Holds'. This is particularly useful in meeting the demands of the Scottish Child Abuse Inquiry but, as the document sets out, has application across a range of business areas and requirements. No immediate action required. The assessment team would, however, be interested to learn about any future updates to the retention schedules.		
6. Destruction Arrangements	G	G	G	G	Update required on any change	Since the RMP was agreed the council has entered into a new contract for the destruction of paper records. The bulk destruction of paper records is now contracted to: Data Solutions 2016 Ltd The Databank Centre Unit 5 Redhill Distribution Centre Salbrook Road Redhill RH1 5DY There are no other notifiable changes.	There is no doubt that the authority continues to take the destruction of paper records seriously. Updated staff guidance addresses this matter thoroughly. Section 9 sets out the authority's expectations over three pages with specific reference to destruction arrangements and responsible personnel. Additional evidence submitted in response to the Interim Report included the Non-EU Award letter, an example certificate of destruction and the Quality Response Form provided by Restore DataShred (now Data Solutions 2016). The assessment team is content that this element remains in compliance. Update required on any future change.	The council have entered into a new contract for the destruction of paper records. The bulk destruction of paper records is now contracted to: Haven Recycle 6-8 Watt Road Hillington Park Ind. Est. Glasgow G52 4RY https://havenrecycle.co.uk/ An example of destruction notices provided by Haven is attached in **Appendix D**. An electronic workflow has been developed in the ECM system to provide electronic authorisation for the destruction of paper based records held within the archives.	Thank you for the update regarding the service provider. The Assessment Team acknowledge the receipt of an example of a confidential waste destruction report in evidence. The Assessment Team recognise that the Objective system (see element 4 above) has the facility to track and schedule for destruction hard copy records and agrees that this should work well for West Lothian Council.

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								There are no other notifiable changes since the last review.	
7. Archiving and Transfer	G	G	G	G	Update required on any change	There are no notifiable changes.	No immediate action required. Update required on any future change.	The Archives and Records Management Policy was replaced by the new Information Governance Policy. There are no other notifiable changes since the last review.	Thank you for this update. The Assessment Team notes that archiving arrangements are covered in section 5.7 of the new Information Governance Policy which is publically available at https://www.westlothian.gov.uk/article/33222/Information-Governance
8. Information Security	G	G	G	G	Update required on any change	West Lothian Council's Information Security Policy is reviewed annually. The policy was approved by council April 2017. There are no changes to be notified to the Keeper. Link to Policy: West Lothian Council's Information Security Policy In addition, the council achieved PSN compliance on 24th of August 2018.	Referencing updated policies assures the assessment team that the authority's assessment and review procedures continue to be robust and fit for purpose. No immediate action required. Update required on any future change. The assessment team again commends the authority for ensuring it remains PSN compliant.	The Information Security Policy was replaced by the new Information Governance Policy. In addition, the Information Handling Procedure has been replaced by the Information Security guidance attached as **Appendix E**. The council achieved Cyber Essentials Plus certification on 22nd August 2019. In addition, the council's security arrangements are assessed annually for compliance with the standards required of the Public Services Network (PSN). The assessment for this year is currently under review. The Information Security arrangements that were within the remit of the council's Information Strategy and Security Manager are now managed by IT Services	The Assessment Team notes that the authority has a new governance document which is publically available at: https://www.westlothian.gov.uk/article/33222/Information-Governance The Information Governance Policy replaces the Information Security Policy agreed by the Keeper in 2013. The Assessment Team acknowledge the receipt of the *Information Security Guidance* this is the version dated June 2019. This document will be retained in order that the authority's submission can be kept up-to-date. The Assessment Team notes that the authority has recently been awarded Cyber Essential Plus certification: West Lothian Council Livingston Sector: Public administration and defence Certificate no:CEP-SAP-34252hide Certificate Level: Cyber Essentials Plus Date issued: 30/08/2019

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								supported by the Records Manager. There are no other notifiable changes since the last review.	Thank you for the update around new oversight arrangements these have been noted.
9. Data Protection	G	G	G	G	Update required on any change	There are no notifiable changes.	No immediate action required. Update required on any future change.	The council's Data Protection Policy was replaced by the new Information Governance Policy. Following this change, guidance in relation to the handling of requests and enquiries under Data Protection law have been reviewed and updated and are attached as **Appendix F** and **Appendix G**. In addition, the mandatory Data Protection Training has been updated and was completed in May 2019. A transcript of the online training is provided as **Appendix H** as evidence of continued commitment to staff training. In addition, the Terms and Conditions of contracts have been updated to reflect the changes to Data Protection Law and are attached as **Appendix I**.	As with all other Scottish public authorities West Lothian 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 Council website has been updated appropriately: https://www.westlothian.gov.uk/dataprotectionandprivacy The Assessment Team notes that the authority has a new governance document which is publically available at: https://www.westlothian.gov.uk/article/33222/Information-Governance The Information Governance Policy replaces the Data Protection Policy agreed by the Keeper in 2013. As well as public policy statements the Council have issued staff guidance: The Assessment Team acknowledge the receipt of the *Data Protection Act 2018 Subject Access Requests Guidance* this is the version dated June 2019. This document will be retained in order that the authority's submission can be kept up-to-date. The Assessment Team acknowledge the receipt of the *Data Protection Act 2018 Data Protection Enquiries Guidance* this is the version dated April 2019. This document will

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									be retained in order that the authority's submission can be kept up-to-date. The importance of adequate staff training is emphasised in data protection legislation. The Assessment Team acknowledge receipt of material in evidence of the Council's data protection training. The Assessment Team acknowledge the receipt of a new *Conditions of Contract for the Supply of Services* document. This is the version dated November 2018. This is a revised version that takes account of changes to data protection legislation in 2018. This document will be retained in order that the authority's submission can be kept up-to-date.
10. Business Continuity and Vital Records	G	G	G	G	Update required on any change	There are no notifiable changes.	No immediate action required. Update required on any future change.	There are no notifiable changes since the last review.	No immediate action required. Update required on any future change.
11. Audit Trail	G	G	G	G	Update required on any change	There are no notifiable changes.	Closely aligned to improvements being made under element 5, this element was considered to be vulnerable to this change. Additional evidence supplied under the interim report liaison period was able to verify all outstanding work had been completed to leave this element in compliance. The additional evidence, including files plans for Education and Revenues and Legal Services, clearly demonstrates that all business areas are covered for audit purposes. Further, evidence of the authority's compliance under this	There are no notifiable changes since the last review.	No immediate action required. Update required on any future change.

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							element is the EDRMs audit register which maintains a detailed record of specific actions that have been undertaken on items within the system. The assessment team is content the PUR shows this element is fully compliant. Update required on any future change.		
12. Competency Framework	G	G	G	G	Update required on any change	All staff must complete mandatory training on Records Management, Data Protection, Freedom of Information, Email and EDRMs. This training was updated and completed in January 2017. There are no notifiable changes.	No immediate action required. Update required on any future change.	All staff are required to complete mandatory training on Records Management, Data Protection, Freedom of Information and Information Security. These training modules are subject to regular review. The mandatory Records Management Training has been reviewed and released to all staff in August 2019. A transcript of the online training is provided as **Appendix J**. The Terms of Reference for the councils Information management Working Group have been reviewed and are provided as **Appendix K**. There are no other notifiable changes since the last review.	The Assessment Team acknowledge receipt of material in evidence of staff records management and data protection training. The Assessment Team acknowledge receipt of the *Information Management Working Group (IMWG) Terms of Reference and Membership*. This document will be retained in order that the authority's submission can be kept up-to-date. The Assessment Team agrees that the Council continues to appropriately provide training and support for staff creating, or otherwise processing records.
13. Assessment and Review	G	G	G	G	Local improvement plans were submitted to 'demonstrate that services within the council know where there are records management issues still to be addressed and have	Updated Improvement Plans are provided in Appendix H. The council conduct an annual survey to evaluate the effectiveness of records management	It is without doubt that the authority continues to take its assessment and review obligation seriously. The Improvement Plan submitted in evidence with this update records, as did	The council conduct an annual survey to evaluate the effectiveness of records management arrangements.	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.)

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					plans in place to address these issues'. These plans show some projects still to be completed. The Keeper wishes to receive updates on these ongoing projects	arrangements. The results of the 2016-17 survey are provided in Appendix I.	earlier version submitted in previous years, in considerable detail all outstanding records management work streams and key targets. It again is a comprehensive working document used to identify needs, allocate responsibility and monitor progress. Management group scrutiny is central to its effectiveness. The assessment team commends the authority for its commitment to this form of internal scrutiny and the pro-active management of potential areas of risk.

No immediate action required. Update required on any future change. | The latest survey was conducted using observation based on 21 assessment criteria. The results of the 2017-18 Survey are provided in **Appendix L**.

Necessary actions are added to service Improvement Plans. Updated Improvement Plans are provided as **Appendix M**. | As previously the Assessment Team is happy to acknowledge that West Lothian Council operate a structured and detailed review of records management provision and of the implementation of the Plan.

An annual engagement with the PUR process is one of several review strands undertaken in WLC.

The Assessment Team acknowledge receipt of a sample of the annual records management survey and improvement plan. |
| 14. Shared Information | G | G | G | G | Update required on any change | There are no notifiable changes. | No immediate action required. Update required on any future change. | The council continue to ensure that information sharing arrangements are governed by appropriate terms and conditions of contract and/or data sharing/processing agreements.

The Data Sharing Code of Practice has been reviewed and updated following changes to Data Protection law. | The Assessment Team acknowledge receipt of *West Lothian Council Data Sharing Code of Practice* Version 1.1 September 2019. This document will be retained in order that the authority's submission can be kept up-to-date. |

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

Version

The progress update submission which has been assessed is the one received by the Assessment Team on 10th October 2019. The progress update was submitted by Carol Dunn, Records Manager.

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

PRSA Assessment Team's Summary

The Assessment Team has reviewed West Lothian Council and West Lothian 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

West Lothian Council and West Lothian Licensing Board continues to take its records management obligations seriously and is working to maintain all elements in 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.
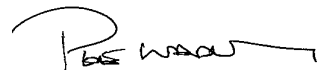
The Keeper cannot change the status of elements formally agreed under a voluntary submission, but he can use such submissions to indicate how he might now regard this status should the authority choose to resubmit its plan under section (5)(6) of the Act.

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

Based on the progress update assessment the Assessment Team considers that West Lothian Council and West Lothian Licensing Board continue to take their statutory obligations seriously and are working hard to maintain all the elements of their records management arrangements in 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