The Public Records (Scotland) Act 2011

Renfrewshire Council and Renfrewshire Licensing Board

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

31st March 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 Renfrewshire Council and Renfrewshire Licensing Board. The outcome of the assessment and relevant feedback can be found under sections 6 – 8.

4. Authority Background

Renfrewshire Council is one of 32 council areas of Scotland. Located in the west central Lowlands, it is one of three council areas   contained within the boundaries of the historic county of Renfrewshire, the others being East Renfrewshire to the east and   Inverclyde to the west. It also shares borders with Glasgow, North Ayrshire and West Dunbartonshire Councils. It is the 9th largest local authority in Scotland with over 9000 staff and a population of 170000.

Renfrewshire Licensing Board consists of a convenor and 7 councillors covering licensing issues in the local authority area.

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: Renfrewshire Council and Renfrewshire Licensing Board

Element	Status of elements under agreed Plan 16AUG16	Status of evidence under agreed Plan 16AUG16	Progress assessment status 10OCT18	Progress assessment status 31MAR20	Keeper's Report Comments on Authority's Plan 16AUG16	Self-assessment Update 27JUN18	Progress Review Comment 10OCT18	Self-assessment Update as submitted by the Authority since 10OCT18	Progress Review Comment 31MAR20
1. Senior Officer	G	G	G	G	Update required on any change		No immediate action required. Update required on any future change		No immediate action required. Update required on any future change.
2. Records Manager	G	G	G	G	Update required on any change		No immediate action required. Update required on any future change		No immediate action required. Update required on any future change.
3. Policy	G	G	G	G	Update required on any change		No immediate action required. Update required on any future change		No immediate action required. Update required on any future change.
4. Business Classification	A	G	A	A	Although a Business Classification Scheme has been developed, it is yet to be fully rolled out across the Council and Licensing Board. The RMP outlines how this will take place, with the BCS providing the structure for the EDMS and shared drives. The Keeper would welcome updates concerning the progress of work in this area.

The IT department of the Council are currently investigating the possibility of purchasing an Electronic Document and Records Management System (EDRMS). The Keeper would like to be informed of the Council's decisions on whether to implement an EDRMS.

Once the BCS has been fully developed, the Council intends to integrate this | The Business Classification Scheme provides a common and consistent framework for a range of records management tasks. It arranges information and records within a logical framework and enables the best use to be made of our information assets.

Renfrewshire Council's scheme is based on the Local Government Classification Scheme and reviewed and approved by the Records Management Working Group.

The Council has moved away from the approach of implementing BCS across all systems and all the Shared Drive by 2019, and instead focus on implementing it as | It is clear that a Business Classification Scheme has now been developed. The use of the Local Government Classification Scheme is sensible, aligning with existing Scottish local authority classifications.

A gradual approach to rolling out the business classification scheme should ensure that there is more committed uptake of its use. As with most aspects of records management, schemes work best when the staff implementing them can see a benefit to their work and can take ownership of implementing them positively. SharePoint and OneDrive should both be structured to implement the business classification scheme to minimise legacy issues over time. | The Business Classification Scheme (BCS) has been incorporated into the ICT & Cyber Security Requirements for Tender specifications. This ensures that, where relevant, future IT tender requirements will include the need for Function Classification and Retention Period monitoring functionality.

The top level of the BCS has also been incorporated into the Information Asset Register (IAR). Staff entering information into the register are asked to select the most relevant top-level Council function it relates to (see screenshot). This allows the Council to check that top level functions have been included within the IAR. Any omissions can therefore be easily identified and addressed.

The BCS is being used to inform the re-design of our web and | It clear that the roll-out of the Business Classification Scheme to all areas of the Council is progressing well.

In the Council's previous PUR they committed that: "future IT tender requirements will include the need for Function Classification and Retention Period monitoring functionality." The Assessment Team is pleased to report that this has been done.

The Assessment Team acknowledges receipt of a sample *Standard Requirements Tenders* document in evidence of this.

The Assessment Team also acknowledges receipt of a |

					document with the retention schedule and other information such as vital records to create a unified document. The Keeper commends this approach and would be interested to learn more about this project. The Keeper can agree this element on an 'improvement model' basis. This means that the authority has identified a gap in provision (a BCS that requires to be implemented across the Council) and has identified how it intends to close this gap and the timescales involved. As part of this agreement the Keeper requests that he is kept informed as work to close the gap progresses.	and when identified as beneficial by departments. This partly due to there being over 200 systems and partly due to the rolling out of SharePoint 365 and OneDrive by IT during 2018. The Council is also working towards completing its updated Information Asset Register. It has been agreed that the Business Classification Scheme and Retention Schedule will be added to the Information Management Strategy action plan, aligning it with the principles in the strategy. This will ensure that, where relevant, future IT tender requirements will include the need for Function Classification and Retention Period monitoring functionality. Evidence included: 1. Business Classification Scheme	The Assessment Team would welcome further updates in future PURs.	intranet platforms and plans to roll out SharePoint. Evidence included: ICT & Cyber Security Requirements for Tender specification. Screen-print of BCS element of IAR. Copy of email from the Council's Data Analytics & Research Manager confirming use of BCS to inform the re-design of our web and intranet platforms and plans to roll out SharePoint.	screen-shot of the Renfrewshire Council Information Asset Register. In the original submission the Council discussed the roll-out of an EDRM and, in the previous PUR, had settled on SharePoint as the optimal solution. The Assessment Team would be interested in understanding how this project is progressing and how effectively the resultant record migration is being pursued. The adoption of SharePoint as the core records management system of the Council is bound to be incremental and take several years to bed-in properly. The Assessment Team remind Renfrewshire Council that appropriate polices, governance and staff training will be crucial in making this major project a success. The Keeper would expect to see evidence of these aspects of the SharePoint implementation in any full resubmission. This element remains at Amber while this work is ongoing.
5. Retention Schedule	G	G	G	G	Update required on any change		No immediate action required. Update required on any future change		No immediate action required. Update required on any future change.
6. Destruction Arrangements	A	G	G	G	The Records Manager is working on developing processes and procedures for the destruction of electronic records managed on some line-of-business systems. There is	The Council has implemented a change in approach in regards to disposal of records, moving away from the certificate of destruction approach to a	The Records Disposal Policy (Jan 2018 v1.0) has been provided. The Keeper thanks the Council for keeping its submission up to date. Annual statements of assurance		Clearly, once all the public records of the authority are managed on the SharePoint system the routine and controlled destruction of electronic records should be

					also a commitment to develop a methodology to impose control on these systems as they do not currently have the functionality to allow the systematic deletion of records in line with the retention schedule. The Keeper commends this initiative and requests that he is kept up-to-date on progress. The Council's Document Disposal Guidelines Document will be approved by the Records Management Working Group in August 2016. Accordingly, the Keeper asks for sight of the approved version when it becomes available. The Keeper can agree this element on an 'improvement model' basis. This means that the authority has identified a gap in provision (the deletion of records from some line of business systems) and has evidenced a commitment to closing this gap. This agreement is dependent upon the Keeper being kept informed of progress as work to close the gap moves forward.	notification of non-compliance with retention schedules. The disposal of records is done in line with the Council Records Disposal Policy and Council Retention Schedule. A new Records Disposal Policy has been produced and approved by both the Council Records Management Working Group and CMT. It was agreed that annually, directors would be asked to provide an assurance statement that their service has met the requirements of the Records Disposal Policy. The Council Records Disposal Policy is available to staff via the staff intranet. Evidence included: 2. Council Records Disposal Policy 3. Electronic Disposal Guidance 4. Confidential Waste Guidance 5. RM Intranet Screen-print 6. CMT Extract	from directors is good practice. Public authorities are at risk of not being able to comply with FOISA if they do not know when, why and on whose authority records have been destroyed. A robust retention schedule which clearly states when classes of information are destroyed (or preserved) and evidence of that destruction, either by certificate or by procedural documentation made available to staff, with additional evidence of staff training on the importance of proper records, is an acceptable, pragmatic method of complying with Element 6. Sufficient evidence of this has been provided to enable the Assessment Team to consider it likely that if this were a statutory review the RAG status would move to Green.		more robust. However, this functionality will probably not be universally operational for some time. In the meantime it will remain important that staff are correctly prompted to destroy records appropriately. That said, as was noted at the last PUR, sufficient evidence of the controlled, secure and irretrievable destruction of public records has been provided to enable the Assessment Team to consider it likely that if this were a statutory review the RAG status would move to Green. No immediate action required but the Assessment Team would always welcome updates on progress.
7. Archiving and Transfer	**G**	**A**	**G**	**G**	The Action Plan section of this element commits the Council to developing more detailed guidance concerning the selection and transfer of records to the Heritage Centre Archive. The Keeper would appreciate sight of this guidance once it has been completed and approved.	Work on this area is still ongoing. New Guidelines for Archival Records were developed in 2017 and approved by the Council Records Management Working Group	The Council's Guidelines for Archival Records (Dec 2016 v0.1) has been provided. The Keeper thanks the Council for providing evidence of this development. The current iteration of the Guidelines do not yet fully cover the gap . It is not	The Council now has a new facility for storing both the Council corporate records and archive collections. The Council is therefore considering the central storage of items identified as of historical value within this facility.	Thank you for the update regarding the improved facility for permanent record storage. http://www.renfrewshire.gov.uk/article/6520/Paisley-opens-new-3.7m-museum-store-in-first-for-UK-High-Street

					The Keeper can agree this element on an 'improvement model' basis. This means that the authority has identified a gap in provision (a Council-wide system of transferring appropriate records to the archive) and has identified how it intends to close this gap. The Keeper, as a condition of this agreement, requests that he is kept informed of progress in this area.		clear which records the Heritage Centre is able to accept and the Council's retention schedules appear to indicate that not all records of enduring value are being transferred to the Heritage Centre. The Assessment Team recommend that in developing the next iteration of the Guidelines, the Council should ensure it has professional archival advice both on preservation and making records accessible to the public through appropriate facilities. The Assessment Team also recommend that the Council consider the Keeper's "Supplementary Guidance on Proper Arrangement for Archiving Public Records" when developing these Guidelines.	The Council are currently conducting an audit of all archive materials held. The Council has also developed a new Tracking Database on SharePoint to track both semi-current records and archive collections. The current Council Records Manager has a Post Graduate diploma in Archives and Records Management. Evidence included: Screen-print of new SharePoint database.	There is clearly a move to tighten up the tracking and selection of records for permanent preservation in line with the availability of this new facility, The Assessment Team acknowledge receipt of a screen-shot of the new SharePoint database showing tracking of hard-copy records (including in archive). The Assessment Team looks forward to updates on the use of this archive provision in subsequent PURs.
8. Information Security	G	G	G	G	Update required on any change		No immediate action required. Update required on any future change		No immediate action required. Update required on any future change.
9. Data Protection	G	G	G	G	Update required on any change		No immediate action required. Update required on any future change		No immediate action required. Update required on any future change.
10. Business Continuity and Vital Records	G	G	G	G	One of the Action Plans under this element is for the Records Manager to raise awareness of vital records within the Corporate Resilience Group and ultimately to include vital records within the Business Classification Scheme. The Keeper requests that he is kept informed of the progress of this work.		No immediate action required. Update required on any future change		No immediate action required. Update required on any future change.
11. Audit Trail	A	G	G	G	The project to implement the BCS will be used to identify the level of provision in place across different service areas and, if necessary, implement systems for the tracking of	Sections of the Council responsible for handling particularly sensitive information use systems capable of monitoring the movement and amending of these	The ability to maintain an audit trail has been identified in a number of software systems that are in wide use in Renfrewshire Council and other local authorities.		The SharePoint migration should greatly increase the control over document tracking although it will take some time for this to be universally applied in the

12. Competency Framework					paper records. The Keeper would be interested to know the results of this project. The authority intends to assess the level of audit trail functionality of their electronic line of business systems and alongside this will establish disposal capabilities within these systems. This work is anticipated to be finished by December 2016. The Keeper would like to be kept informed of work in this area. There is no audit trail functionality or version control applied within the Council's shared drives. The authority intends to rectify this through the Business Classification Scheme and the development of staff guidance. The Keeper requests sight of this guidance and training material once available and asks for updates concerning the BCS. The Keeper can agree this element on an 'improvement model' basis. This means that the authority has identified a gap in provision (lack of audit trail for some electronic line of business systems and records stored on shared drives) and has identified how it intends to improve the levels of provision. As part of this agreement, the Keeper will need to be kept informed of progress.	records. Areas include OHMS (Housing), Information@Work (Corporate EDMS), SWIFT (Social Care), and SEEMIS (Education). Version control guidance is in place to help ensure that, where appropriate, documents are marked with version numbering and amendment history. This guidance is available to staff via the Staff Intranet. Evidence included: 7. Version Control Guidance 8. RM Intranet Screen-print 9. OHMS Audit Examples 10. SWIFT Redacted Screen-print 11. Info@work Extract 12. SEEMIS Functionality Email - IT Training/Professional Development Officer	Version control guidance (Feb 2018 v1.0) has been provided. The Keeper thanks the Council for bringing its submission up to date. As the business classification scheme is rolled out and structured SharePoint and OneDrive systems replace unstructured shared drives, the Team would encourage further use of version control and audit mechanisms including records of destruction. This will assist the Council in ensuring that retention schedules are applied appropriately. The Assessment Team would welcome further updates in future PURs. The Assessment Team consider that sufficient evidence of progress in this area has been provided to move the RAG status of this element to Green.		authority. However, in the short term it should be noted that the Assessment Team consider that sufficient evidence of progress in this area has been provided to move the RAG status of this element to Green even before SharePoint is fully bedded in.. The Assessment Team would welcome further updates in future PURs.
12. Competency Framework	G	G	G	G	The Keeper commends the initiative to create a specific training module on records management and would be interested to see a sample of this once available.		No immediate action required. Update required on any future change		No immediate action required. Update required on any future change.

13. Assessment and Review	**A**	**G**	**G**	**G**	There is a strong commitment to undertake periodic reviews and audits of the RMP and accompanying policies, as well as a plan to develop a review and assessment protocol which will provide a framework for ensuring that the RMP remains up-to-date. The Keeper commends this approach and requests that he is sent the assessment methodology once it has been developed and approved. The Keeper can agree this element on an 'improvement model' basis. This means that the authority has identified a gap in provision (the methodology for carrying out regular reviews of the RMP) and has evidenced a commitment to closing this gap. This agreement is conditional on being provided with the assessment methodology once it has been developed and implemented.	The Records Management Plan and Improvement Plans were audited in 2017 to ensure progress, monitoring and compliance. The Records Manager submits, on behalf of the Director of Finance & Resources, an annual report on implementation of the RMP and general compliance with the PRSA to the Council's Audit, Scrutiny, and Petitions Board. The Council will also align annual reviews of the RMP with the Keeper of Records invitations for updates. Regular updates are also provided to the Head of Corporate Governance for discussion at CMT. Evidence included: 13. CMT Approval Extract 14. This PUR Submission	Annual reports to a Council Board consisting of Elected Members is very positive and the Council is to be commended for giving records management a high profile in this way. Auditing the Plan is also positive. The Keeper would like to see the assessment methodology that is currently in use. The Council is also to be commended for making use of the Progress Update Review process as part of their assessment methodology. The Assessment Team consider that sufficient evidence of progress in this area has been provided to move the RAG status of this element to Green.		The Assessment Team consider that sufficient evidence of progress in this area has been provided to move the RAG status of this element to Green. No immediate action required. Update required on any future change.
14. Shared Information	**G**	**G**	**G**	**G**	Update required on any change		No immediate action required. Update required on any future change		No immediate action required. Update required on any future change.

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 11th November 2019. The progress update was submitted by Andy Connor, Records Manager.

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

PRSA Assessment Team's Summary

The Assessment Team has reviewed Renfrewshire Council and Renfrewshire 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

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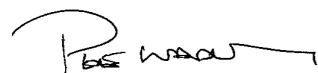
The Keeper cannot change the status of elements formally agreed under a voluntary submission, but he can use such submissions to indicate how he might now regard this status should the authority choose to resubmit its plan under section (5)(6) of the Act.

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

Based on the progress update assessment the Assessment Team considers that Renfrewshire Council and Renfrewshire 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