

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

**Renfrewshire Valuation Joint Board**

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

**1<sup>st</sup> August 2023**

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## 1. Public Records (Scotland) Act 2011

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

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

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

## 2. Progress Update Review (PUR) Mechanism

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

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

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

## 3. Executive Summary

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

#### 4. Authority Background

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

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

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

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

#### 5. Assessment Process

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

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

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

#### Key:

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

Element	Status under agreed Plan 18JAN16	Progress review status 28JUL22	Progress review status 01AUG23	Keeper's Report Comments on Authority's Plan 18JAN16	Self-assessment Update 13APR22	Progress Review Comment 28JUL22	Self-assessment Update as submitted by the Authority since 28JUL22	Progress Review Comment 01AUG23
1. Senior Officer	G	G	G	Update required on any change.	As notified to Pete Wadley and Hugh Hagan by email from Lindsey Hendry on 19 October 2021, the Assessor for Renfrewshire Valuation Joint Board, Kate Crawford, retired on 17th October 2021. Robert Nicol is the new Assessor and is now the Senior Officer who has corporate responsibility for our records management.	The Assessment Team is grateful for this update which has been noted.	No change.	Update required on any change.
2. Records Manager	G	G	G	Update required on any change.	No change.	Update required on any change.	No change.	Update required on any change.
3. Policy	G	G	G	Update required on any change.	<p>The Records Management Policy was fully reviewed and approved by the Governance Working Group on 27 April 2021.</p> <p>The updated Policy sets out Employee responsibilities in more detail, including that key knowledge and skills required by staff with operational responsibility for records management will be clearly defined and explained to staff to ensure that they understand their roles and responsibilities. The updated Policy also reinforces that the Data Protection Officer is responsible for delivering staff training on Records Management.</p> <p>This was circulated to all staff on 27.4.21</p> <p>The Housekeeping Manual for the Electoral Management System (EMS) was agreed by the Governance Working Group to be kept as a separate document as not all RVJB staff have access to the EMS. This is in line with Data Protection Principles, as only staff who have a business need to obtain access are provided with the appropriate authentication. The manual was circulated to staff for information purposes.</p>	<p>The Assessment Team thanks you for this update on Records Management Policy review, and the associated changes in RVJB approach to operational records management and the required knowledge and skills. The Team have no concerns about this Element, but require an update on any change.</p>	<p>The Records Management Policy was reviewed and revised by our Information Governance Solicitor/ DPO in January 2023. The Governance Working Group and Management Team reviewed the updates and approved in February 2023.</p> <p>The main updates are as follows:</p> <ul style="list-style-type: none"> <li>Addition of the principles of good records management as set out by the National Records of Scotland.</li> <li>The separation of 'Purpose' and 'Scope' in order to elaborate on both, particularly adding more detail on the responsibilities on all staff.</li> </ul> <p>Update on the cross-references to other Policies to ensure accuracy and up-to-date.</p>	<p>The Assessment Team thanks you for this update on recent Records Management Policy revision. It is apparent from this update that RVJB continues to keep their RM Policy up to date and therefore fit for purpose.</p> <p>Update required on any change.</p>
4. Business Classification	G	G	G	Update required on any change.	<p>The Business Classification Scheme is in the process of being reviewed, with the Records Manager currently incorporating into the Board's Retention Schedule for ease of reference.</p> <p>Significant work has been done in relation to hard-copy scanning. All Council Tax paper files have now been fully scanned and paper files securely destroyed. Valuation records are now fully electronic. We are a substantial way through the scanning of Non-Domestic paper files and work will continue on this throughout the coming months.</p>	Thank you for updating the Assessment Team on this Element. We note that Valuation records are now fully electronic, and that scanning of other records continues. It is perfectly reasonable to maintain paper format records as indicated.	A full review of the Business Classification Scheme was undertaken, incorporating into the Board's Retention Schedule to provide a consistent resource for staff in one place. It also contains an introduction and users' guide for staff. The integrated Business Classification Scheme and Records Retention Schedule is maintained by	Thank you for this very positive update on full review of the Business Classification Scheme, including the incorporation of the Board's Retention Schedule. This will help the organised migration

				<p>It is notable that some files are not capable of being held electronically, for example large architect's plans and these will be kept in paper format which are tracked via the paper record filing system.</p> <p>Work on the shared drive for valuation data was stopped as there is a planned move of our core Valuation system to a new valuation system and files will be migrated to this system. The system will significantly contribute to good records management as it is, designed with electronic retention periods. It is currently expected the migration to the system will be the latter half of this year.</p> <p>The Records Manager, DPO, Senior IT Manager and Service Co-Ordinator have held monthly meetings to discuss, review and manage Electronic Records Management. As a result of these regular meetings there has been significant development to the migration of personnel, governance, and corporate electronic files over to the EDMS. The software allows retention timescales to be added when a document is added to ensure efficient records management.</p> <p>The Records Manager and DPO have also been having regular meetings with an IT Manager and Senior Clerical Manager with responsibility for the electronic system Elector8 to ensure it is being used to its full capacity for good electronic management of records.</p>	<p>We note the upcoming move to a new line-of-business system with thanks.</p> <p>Thank you also for letting us know about the regular electronic records management meetings. Keeping records management on the agenda is a good way to ensure that it continues to be considered alongside any changes in the operations of the organisation, and it sounds like RVJB keeps RM matters appropriately high-profile.</p>	<p>the Records Manager with support from the DPO.</p> <p>The Records Manager, DPO, Senior IT Manager and Service Co-Ordinator continue to hold monthly meetings to discuss, review and manage Electronic Records Management. There continues to be significant development to the migration of personnel, governance, and corporate electronic files over to the EDMS.</p> <p>The Records Manager and DPO continue to have regular meetings with an IT Manager and Senior Clerical Manager with responsibility for the electronic system Elector8 to ensure it is being used to its full capacity for good electronic management of records. More recently, the Records Manager has encouraged the IT Manager and Senior Clerical Manager to be more proactive in discussing records management with their peer working group to gather different ideas and advice for this particular software.</p>	<p>of necessary content onto the EDMS.</p> <p>It is also very good to hear that DPO and the Records Manager continue to work collaboratively on RVJB's line-of-business system Elector8, and to engage colleagues in other relevant areas in conversations on records management.</p> <p>Update required on any future change.</p>	
5. Retention Schedule	G	G	G	<p>Update required on any change.</p> <p>The Retention Schedule was reviewed and significantly revised in April 2021. This is held on our EDMS to ensure staff are aware of the appropriate retention periods when dealing with documents. It is also held on RVJB's website.</p> <p>As referenced in Element 4, the Business Classification Scheme is in the process of being reviewed, and will be incorporated into the Board's Retention Schedule for ease of reference.</p> <p>The Governance items were expanded on to more fully reflect the records handled by the organisation, as well as a new HR sheet created to set out in more detail the extent of the HR records held. The more detailed itemisation should ensure that the retention and disposal arrangements are more accurately followed.</p>	<p>The Assessment Team is grateful for this update on the revision of RVJB's Retention Schedule. The current project of reviewing the Business Classification Scheme is a good opportunity to review both.</p> <p>The more detailed itemisation within the Schedule is also noted with thanks.</p>	<p>The Retention Schedule underwent a further review as part of the integration process with the Business Classification Scheme. During this process there was ongoing reassessment of the appropriate retention periods.</p> <p>The Records Manager and DPO worked closely with the Senior Clerical Manager and have completely reviewed and updated all retention periods for Electoral records.</p>	<p>Thank you for this update. The Retention Schedule review, alongside the BCS review, is a very positive step, especially taking the EDMS implementation into account.</p> <p>Thank you also for confirming that all Electoral Records retention periods have recently been reviewed.</p> <p>Update required on any future change.</p>	
6. Destruction Arrangements	A	A	A	<p>The Board recognises the importance of the secure and irretrievable destruction of records and has supplied their <i>Protective Marking Handling Disposal Policy &amp; Procedures</i> document as evidence.</p>	<p>The EDMS workflow runs at the end of each month to identify the documents that meet the retention criteria as per RVJB's retention schedule. A link to the folder where the documents, which have met their expiry date, are reviewed by appropriate personnel and documents are either deleted using the metadata fields in the document</p>	<p>Thank you for this explanation of EDMS workflow with regard to regular, practical records destruction. Thank you also for clarifying how this</p>	<p>The Service Co-Ordinator has continued to work consistently on the migration of all our data stored on the management network shares to the EDMS and has made significant progress, with only minimal working</p>	<p>This is a very helpful update, detailing ongoing work on records migration from network drives onto the EDMS, as detailed</p>



				<p>However, the processes by which electronic records will be destroyed will form part of another policy which has not yet been rolled-out. The Keeper requests that this policy is forwarded to him as soon as it becomes available in order that he may keep the Board's submission up-to-date.</p> <p>The Board is also considering incorporating the automated disposal of electronic records within their IT system. Whilst this must remain a business decision for the Board, the Keeper commends this initiative and asks that he be kept informed and supplied with details should a decision be taken.</p> <p>The Keeper agrees that Renfrewshire Valuation Joint Board has procedures in place to suitable destroy paper records, hardware and back-ups when appropriate, as required by the Act. He agrees this element of the Plan on 'improvement model' terms on the condition that the Board pursues the creation of a policy detailing the management (including deletion) of electronic records as committed to on page 12 of the Plan.</p>	<p>template or retained. The workflow runs every month and is cleansed appropriately immediately.</p> <p>There has been significant development in the second stage of the installation - the migration of all our data stored on network shares to the EDMS with an emphasis on the migration of personnel, governance, and corporate electronic files over to the EDMS as these documents contain personal data which are deleted when no longer required as retention timescales are added to each document from the date the document was created, not when saved on to the EDMS.</p> <p>Work on the shared drive for valuation data was stopped as there is a planned move of our core valuation system to a new valuation system and files will be migrated to this system. The system will significantly contribute to good records management as it is, designed with electronic retention periods. It is currently expected the migration to the system will be the latter half of this year.</p> <p>As referenced in Element 3, the Housekeeping Manual for the Electoral Management System (EMS) was agreed by the Governance Working Group to be kept as a separate document as not all RVJB staff have access to the EMS. The manual was circulated to the relevant staff for information purposes and appropriate training given.</p>	<p>works when it comes to the gradual migration of all data stored on network shared drives.</p>	<p>documents remaining on network drives. This ensures that retention timescales are managed electronically by the system, as previously outlined.</p> <p>The Service Co-Ordinator also continues to prioritise destruction of physical records in line with the retention timescales. The Service Co-Ordinator recently was allocated a new assistant post who is ably assisting in managing destruction of physical and electronic records.</p>	<p>under Element 4 as well. This puts RVJB in a good position with regard to automated retention and destruction management.</p> <p>Thank you also for providing an update regarding physical (paper) records, as well as the additional resource provided for this area in the form of an Assistant post. This is very positive.</p> <p>It is clear that RVJB continues to invest in the improvement of its electronic records management operations (including both EDMS and a line-of-business system for valuation data), but that the full roll-out of these systems is still an ongoing endeavour.</p> <p>This element will remain at Amber until the electronic records destruction systems have been fully implemented and are operational.</p>
7. Archiving and Transfer	G	G	G	Update required on any change.	No change.	Update required on any change.	No update.	Update required on any change.
8. Information Security	G	G	G	Update required on any change.	<p>The Information Security Policy has been reviewed and updated, most recently in August 2021.</p> <p>In November 2021, the organisation implemented software called Safe Send for All Staff. This software is designed to prevent misaddressed emails being sent or the wrong attachments issued. The software requires users to confirm external recipients and attachments after initially selecting 'send' in Outlook. The software has also been configured to pick up certain words such as 'confidential', 'internal', 'restricted' etc as well as NINO's and credit card numbers to alert staff and ask them to think twice about who and what information they are</p>	<p>Thank you for letting the Assessment Team know that the Information Security Policy update took place in August 2021.</p> <p>It is also interesting to hear about the Safe Send software implementation and the Cyber Security awareness campaign.</p>	<p>No notifiable changes to arrangements, cyber security training/software still utilised, training sessions and bulletins continue to be regularly implemented as per previous submission.</p> <p>The Senior Officer, Records Manager, DPO and Senior IT Manager recently attended a Ransomware training course delivered by Cyber-Scotland which</p>	<p>Thank you very much for confirming that no major updates have been made to policies or practices under this element.</p> <p>It is good to hear of the recent ransomware training, attended by individuals in key</p>

				<p>sending. SafeSend can also help to prevent spear phishing attacks by highlighting external email addresses, even ones that look like they came from within your organisation.</p> <p>The Board's DPO carried out Information Governance training to All Staff in June and July 2021, tailored to the three functions of the Board i.e., domestic/ non-domestic valuation and electoral registration, which included training specifically on Information Security matters.</p> <p>The Board's DPO introduced a monthly Think Twice bulletin in January 2021 which is issued to All Staff. This monthly bulletin ensures that key information security messages are disseminated to all staff on a regular basis.</p> <p>The Board's DPO also ensures that the Information Security Reporting Procedures are circulated to all staff every 3-months, most recently in February 2022.</p> <p>It remains mandatory for all staff to complete an online training course each year on Information Security.</p> <p>In addition to this, in April 2021 our IT section ran an awareness campaign on Cyber Security for all staff. This included issuing several mock phishing emails to all staff and additional training for those staff who failed to identify it was a suspicious email. At this time, all staff were required to complete VIPRE training courses on (i) Defending Against Phishers and (ii) Ransomware, how to defend yourself. This is an annual awareness campaign which will be replicated this year for all staff.</p> <p>Cyber Security Courses are also mandatory for all staff and are delivered via online training courses.</p>	<p>Staff training updates are explored under Element 12.</p> <p>It is evident from this update that RVJB continues to recognise the importance of robust information security arrangements.</p>	<p>simulated a Phishing Attack scenario to work through with Ethical Hackers. The Senior IT Manager continues to implement technical and organisational measures to manage Information Security.</p> <p>It has not been previously noted that the DPO maintains an Information Security Log which records all Information Security incidents. This reinforces to staff the importance of reporting, even if the incident is a 'near-miss'. The reporting procedures work well. None have been identified as reportable to the Information Commissioners' Office but have been recorded for lessons learned and to identify any areas which may require further staff training.</p>	<p>records management roles.</p> <p>The described Information Security Log, maintained by the Data Protection Officer, is a helpful way to keep track if IS incidents and, as RVJB recognises, can result in better information security through near-miss reporting. It is clear from this update that Renfrewshire Valuation Joint Board continues to maintain robust information security arrangements.</p> <p>Update required on any future change.</p>
9. Data Protection	G	G	G	<p>Update required on any change.</p> <p>Data protection remains a standing item on the agenda of the Governance Working Group which is chaired by the Records Manager. The Board's DPO is now a member of the Governance Working Group and provides updates and advice to the Governance Working Group monthly.</p> <p>The Data Protection Policy was reviewed and updated in January 2021.</p> <p>The Public Privacy Notice was last updated on 12 April 2022 and the up-to-date version uploaded onto our website on that date. The Privacy Notice for Employees was updated on 11 January 2021 and circulated to all staff on that date. This Privacy Notice is also circulated annually to ensure all staff have an understanding of how RVJB uses their personal information, as well as their rights over their information.</p> <p>The Board's DPO carried out Information Governance training to All Staff in 2021, tailored to the three functions of the Board i.e., domestic/ non-domestic valuation and electoral registration, which included training specifically on Data Protection matters.</p>	<p>Thank you for this update on Data Protection. It is good to hear it remains a standing item of the Governance Working Group, and that the SAA Governance committee regularly discusses matters relevant to data protection.</p> <p>The review and update of RVJB's Data Protection Policy in January 2021, as well as the update of the privacy notices, is noted with thanks.</p> <p>For comments on the training updates, see Element 12.</p>	<p>The Data Protection Policy was reviewed and revised by our Information Governance Solicitor/ DPO in January 2023. The Governance Working Group and Management Team reviewed the updates and approved in February 2023.</p> <p>The main revisals are as follows:</p> <ul style="list-style-type: none"> <li>• Cross-reference to other related, key policies and procedures</li> <li>• Reference to the work of the Governance Working Group</li> <li>• Reference to Privacy Notices for staff and public</li> </ul>	<p>Thank you for updating us on RVJB's Data Protection Policy revision and update. It is especially good to hear that this has now been further linked to other key policies and procedures.</p> <p>Update required on any change.</p>



					<p>Bespoke training will be carried out in this year by the DPO, similar to the training carried out in 2021.</p> <p>The Senior Manager and Records Manager are members of the SAA Governance Committee who meet regularly to discuss and information share on data protection and other items relating to governance.</p>			
10. Business Continuity and Vital Records	A	G	G	<p>The Board has not yet adopted the formal <i>Business Continuity Plan</i> which at the time of the assessment is described as 'currently being finalised by the Internal Governance Working Group'. A separate <i>IT Disaster Recovery Plan</i> has also been created and awaits final sign-off. The Keeper welcomes creation of these policies and asks that he has sight of them once approved and operational.</p> <p>The Keeper agrees this element of the Renfrewshire Valuation Joint Board's records management plan under 'improvement model' terms. This means that he recognises that an authority has acknowledged a gap in provision (two vital business continuity policies have not yet been approved) but have put processes in place to close that gap. The Keeper's agreement is conditional of him being provided with fully authorised policy documents as soon as they are available.</p>	<p>RVJB's Virtual infrastructure is backed up by a Disaster Recovery supplier including replication of its critical servers to an offsite location via a dedicated fibre link. This will protect RVJB's data in the event of an IT disaster and or malicious attack.</p> <p>RVJB also continue to conduct an annual Disaster Recovery test which is invoked by RVJB's IT department in order to test recovery times and the overall IT DR plan.</p> <p>The DR Plan, approved by the Management Team in December 2020, is continuously reviewed to ensure the most up to date information/ contact details for relevant personnel are held and to ensure any changes to DR is referenced accordingly. This has been rolled out to appropriate staff members. The DR plan is held on a SharePoint site on the cloud which ensures accessibility and can be distributed easily to all staff if required.</p> <p>RVJB are still in the process of moving away from the Core Valuation System hosted by Renfrewshire Council as the ND/CT arm has not migrated yet but is planned for the latter half of this year and is referenced in Element 4.</p>	<p>The Keeper's Model Plan states that an authority's business continuity arrangements should include the recovery of records made temporarily unavailable due to an unexpected event. The update given by RVJB indicates that a Disaster Recovery Plan is now in place and regularly tested. Although RVJB are still moving away from the Core Valuation System, significant improvements in this area have been made.</p> <p>As indicated in the previous PUR, this Element can now be turned from Amber to Green. If this was a formal resubmission, it is likely that RVJB would also be able to obtain a Green RMP status for this Element.</p>	<p>Disaster Recovery Test was carried out in February 2023. The Senior IT Manager concluded it was a positive test. A member of staff was involved and during the test she was able to connect successfully and access a number of resources. During the test, there was successful connection to all file shares and mapped drives.</p> <p>Minor issues identified during the test are being resolved and will be retested.</p>	<p>The Assessment Team thanks you for this update. Periodical testing is a good way to measure aspects of an organisation's preparedness in the face of an unexpected events. It is positive to hear that this test had a positive outcome, and that minor issues identified are being resolved and retested.</p> <p>Update required on any future change.</p>
11. Audit Trail	A	G	G	<p>The Board recognise that whilst audit trail functionality is available for electronic records, procedures regarding paper records need to be developed and a logging out sheet will need to be created. These action points will be added to the Internal Governance Working Group's remit. The Keeper is pleased to see the Board's commitment to close the gap in provision under this element and asks for updates as work in this area progresses.</p> <p>The Keeper agrees this element of Renfrewshire Valuation Joint Board's records management plan under 'improvement model' terms. This means that the authority has acknowledged a gap in provision (movement of paper records is</p>	<p>There are no notifiable changes to Arrangements.</p>	<p>Update required on any change.</p>	<p>No update.</p>	<p>Update required on any change.</p>

				inadequately tracked) and has made a commitment to implement a process that will close that gap. The Keeper's agreement is conditional on him being updated as this project progresses.				
12. Competency Framework	G	G	G	<p>The Board recognise that staff require further training on the operation of the retention schedule. There is a commitment to providing staff with a 'clear set of rules'. The Keeper commends this commitment and requests a copy of these rules when they become available.</p>	<p>The Board's DPO carried out Information Governance training to All Staff in June and July 2021, which included training specifically on Records Management issues.</p> <p>Training on all aspects of Information Governance (Data Protection, Records Management, Information Security and Freedom of Information) is delivered by the Board's DPO to all New Starts as a matter of standard practice.</p> <p>The Board's DPO carried out a training session specifically for Managers which covered Records Management matters in detail.</p> <p>The DPO is conscious that the updated Records Management Policy now refers specifically to the DPO's responsibility for training staff on Records Management. The DPO is committed to delivering regular training sessions and bulletins for staff to maintain a good level of awareness of Records Management issues amongst staff at all levels.</p> <p>As highlighted previously, the DPO introduced a monthly Think Twice bulletin in January 2021 which is issued to All Staff. This monthly bulletin ensures that key information governance messages are disseminated to all staff on a regular basis, including Records Management issues specifically. Examples of Think Twice bulletins are "The Principles of Good Records Management" and "Retention and Disposal". The DPO has prepared further Records Management guidance for staff which will be circulated over the next few months.</p> <p>The DPO, alongside the Records Manager, is supported by Senior Management to attend courses which will build confidence in dealing with Records Management matters. The DPO attended the National Records of Scotland PRSA Surgery in April 2021 as well as the PRSA Newcomers Surgery in July 2021.</p> <p>The DPO also liaises with the Records Manager for Renfrewshire Council and has asked to be included in any training courses delivered by Renfrewshire Council's Records Manager.</p>	<p>This is a positive update, and shows that RVJB continues to ensure that staff continue to be trained and supported when dealing with specific or general records management-related practice.</p> <p>It is particularly apparent that the Data Protection Officer has been active in carrying out training to all levels of staff and is taking their responsibilities under the RMP seriously in this regard. It is also good to hear that both the DPO and Records Manager are supported to attend training courses in records management.</p> <p>The staff bulletin also seems like a good method to regularly raise the profile of important records management issues.</p>	<p>No notifiable changes to arrangements, training sessions and bulletins continue to be regularly implemented as per previous submission.</p>	<p>Thank you for letting the Assessment Team know that Renfrewshire Valuation Joint Board continues to implement robust staff training and support. Update required on any future change.</p>
13. Assessment and Review	G	G	G	<p>The Board is committed to regular reviews of its Plan and have set a provisional date for undertaking the first such self-assessment by October 2016. There are similar plans to review key policies and there will be a constant review of the Business Classification Scheme and Retention Schedule during</p>	<p>The Records Management Plan was most recently reviewed and updated in October 2021.</p> <p>The Records Manager has also been working with the Internal Auditors of Renfrewshire Council on the 2021/22 audit of our Records Management arrangements. The finalised report was issued in April 2022 and identified that satisfactory arrangements are in place which ensure adequate progress of the Records Management Plan with</p>	<p>Thank you for letting us know that the RMP was reviewed and updated in October 2021.</p> <p>The recent audit of records management arrangements with minimal improvement</p>	<p>Renfrewshire Council conducted an Internal Audit during 2021/2022. The findings were not complete at the date of the last PUR. The Internal Audit Report was concluded April 2022 and reported to Board on 10 June 2022, as follows.</p>	<p>The Assessment Team is grateful to hear of the results of the Internal Audit 2021/2022. This is a great way to assess the practices and practical processes in place, and to ensure</p>

				<p>their implementation. The Keeper applauds these commitments and asks that he is kept informed of these self-assessments, particularly if they result in new policy documents or procedures being introduced.</p>	<p>only a service improvement recommendation relating to the Plan published on our website.</p>	<p>recommendations is also very positive news, and noted with thanks. In addition to this, the regular participation of RVJB in the PUR process is also commendable.</p>	<p><b>Audit Scope:</b>  1. Interviewed the relevant officers to ascertain the arrangements in place for records management and obtained a copy of the record management plan.  2. Prepared and undertook a series of tests to ascertain the progress in completing the actions contained within the record management plan.</p> <p><b>Key Audit Assurance:</b>  1. There is adequate management/board oversight and progress against the records management plan is reviewed regularly.  2. Timeous progression of actions and developments is monitored through regular progress reviews which are adequately evidenced and reported on.  3. Although there have been no deviations from the plan to date, any variations could be easily identified through the progress reviews and confirmation was obtained that any remedial action required would be agreed at an appropriate level in the organisation.</p> <p>There were no key risks identified during the audit.</p> <p>The audit identified that satisfactory arrangements are in place which ensure adequate progress of the Records Management Plan.</p>	<p>these match the policies and plans.</p> <p>The Team agrees that 'satisfactory arrangements are in place which ensure adequate progress of the Records Management Plan'.</p> <p>Update required on any future change.</p>
14. Shared Information	<b>G</b>	<b>G</b>	<b>G</b>	<p>Update required on any change.</p>	<p>Information Sharing arrangements are reviewed on a regular basis by our DPO. The template Information Sharing Protocol was reviewed and updated by our DPO (Information Governance Solicitor) and is now used as a default in any information sharing arrangement.</p>	<p>Thank you for keeping the Assessment Team updated on RVJB's Information Sharing arrangements, and the DPO work that has gone into reviewing and updating the template Protocol. It is very good to hear that that continuous review of arrangements, identified as best practice, continues to take place.</p>	<p>No update.</p>	<p>Update required on any change.</p>

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

### Version

The progress update submission which has been assessed is the one received by the Assessment Team on 15<sup>th</sup> March 2023. The progress update was submitted by Lindsey Hendry, Assistant Assessor and Electoral Registration Officer.

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

### *PRSA Assessment Team's Summary*

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

### General Comments

Renfrewshire Valuation Joint Board continues to take its records management obligations seriously and is working to bring all elements into full compliance.

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

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

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

Based on the progress update assessment the Assessment Team considers that Renfrewshire Valuation Joint Board continue to take their statutory obligations seriously and are working hard to bring all the elements of their records management arrangements into full compliance with the Act and fulfil the Keeper's expectations.

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

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



Iida Saarinen  
Public Records Officer