

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

**Central Scotland Valuation Joint Board**

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

**29 October 2019**

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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 Central Scotland Valuation Joint Board. The outcome of the assessment and relevant feedback can be found under sections 6 – 8.

### 4. Authority Background

Central Scotland Valuation Joint Board was established by the Valuation Joint Boards (Scotland) Order 1995 to carry out the valuation functions of Clackmannanshire, Falkirk and Stirling Councils. It came into existence on 1st 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 4 Councillors representing Stirling Council, 8 Councillors representing Falkirk Council and 3 Councillors representing Clackmannanshire Council.

In order to carry out the valuation and registration functions, the Joint Board is required by law to appoint an Assessor who is an independent statutory official and who will also be a Chartered Surveyor. The Assessor has also been appointed by the three constituent councils as Electoral Registration Officer. In pursuit of these duties the Assessor and Electoral Registration Officer is answerable to the Courts in terms of valuation or registration decisions.

The Joint Board, through the office of the Assessor and Electoral Registration Officer and staff, carry out three main functions:

1. To produce and maintain the Valuation Roll which sets out the rateable values of all "*lands and heritages*" (except where excluded by statute) for rating purposes.
2. To prepare and maintain the Register of Electors.
3. To produce and maintain the Valuation List which sets out the banding of all dwellings for Council Tax.

## 5. Assessment Process

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

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

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

### Key:

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

Element	Status of elements under agreed Plan, 28 Jun 2018	Status of evidence under agreed Plan, 28 Jun 2018	Progress assessment status, Oct 2019	Keeper's Report Comments on Authority's Plan, 28 Jun 2018	Self-assessment Update as submitted by the Authority since 28 Jun 2018	Progress Review Comment, Oct 2019
1. Senior Officer	G	G	G	Update required on any change.	This remains unchanged	No immediate action required. Update required on any future change
2. Records Manager	G	G	G	Update required on any change.	This remains unchanged	No immediate action required. Update required on any future change
3. Policy	G	G	G	Update required on any change.	This remains unchanged	No immediate action required. Update required on any future change
4. Business Classification	A	G	A	The 'Future Developments' section of this Element states that the BCS has not yet been rolled-out across the organisation. CSVJB has provided information regarding its plans to implement the BCS. The Future Developments section of this Element states that it is anticipated that the work to develop and roll out the BCS will take approximately two years. The Keeper can accept this and requests that he is kept informed	Significant progress has been made with the implementation of SharePoint as CSVJB's EDMS. The soft launch of SharePoint has now taken place with a SharePoint splash page now replacing the former Staff Intranet page (evidence 0.01R). In addition there is now a clear structure in place for the migration of all remaining documents from network drives into SharePoint which reflects	It is very encouraging to hear of the steady progress being made in developing the Business Classification Scheme. The review of the proposed timetable is very sensible and the decision to implement the BCS fully only after the migration of records to SharePoint is a practical approach to a complex process. Additionally, the

				<p>as work progresses. CSVJB is also currently implementing SharePoint as its EDMS. The BCS will provide the structure for migrating records and information from shared network drives to SharePoint. Screenshots showing the structure of records on the EDMS (evidence 043-045) have been submitted as evidence. CSVJB has submitted a Progress Report for the work of this project as at March 2018 (evidence 030A). The EDMS was due for a soft launch in April 2018 and the Keeper would be interested to find out how the system is operating at an appropriate time after full roll-out</p> <p>The Keeper can agree this Element on an 'Improvement Model' basis. This means that the authority has identified a gap in provision (the lack of a fully rolled-out BCS and EDMS) and has identified how it intends to close this gap. This agreement is dependent upon the Keeper being kept informed on the progress of work to close this gap.</p>	<p>the draft CSVJB BCS (evidence 0.02R - 0.05R).</p> <p>Following the migration of Staff Intranet records it became clear that the initial timetable for the migration of remaining records was unrealistic and a revised timetable was required. This timetable will be discussed at a meeting of the SharePoint implementation group in September.</p> <p>The Draft BCS is still under review with a view to full implementation in 2020 following completion of migration to SharePoint.</p> <p>Records Management training is now available to all Line managers via Falkirk Council Online training module.</p>	<p>consolidation of records into a single EDRMS will benefit the authority by enabling better management of these records.</p> <p>Although this element remains Amber, there is clear progress towards achieving a Green status in due course.</p>
5. Retention Schedule	<b>G</b>	<b>G</b>	<b>G</b>	Update required on any change.	Regularly reviewed with most recent being August 2019 (evidence 0.06R).	This update is helpful. The PRSA Team suggest that the retention period 'indefinite' could usefully be revised to 'current' or

						<p>'permanent' so as to distinguish between those records that have long-term archival value and those that have long-term working value. Some of the 'indefinite' records could be destroyed once they are no longer useful to the authority while others could be transferred to the archives once they are not required for business purposes. The disposal methods would then change to 'shred' or 'send to archives' as appropriate.</p>
6. Destruction Arrangements	<b>A</b>	<b>G</b>	<b>G</b>	<p>The RMP also states that CSVJB intends to develop a high-level Disposals Register to summarise the destruction of records in line with the Retention Schedule. This will refer to the in-house destruction of both paper and electronic records as well as the destruction carried out by the commercial shredding company engaged by CSVJB. The Keeper commends the intention to develop and implement a Disposals Register.</p> <p>The Keeper can agree this Element on an 'Improvement Model' basis. This means that the authority has</p>	<p>Information asset disposal Schedule now available to record disposal of bulk paper records and other media such as servers and tapes. (Evidence 0.07R).</p> <p>The scanning of approximately 140,000 Council Tax property records was completed in March 2019. These records have yet to be disposed of and are currently stored in locked and sealed metal cabinets pending bulk destruction and have not therefore been recorded on the information asset disposal schedule as yet.</p>	<p>An example of the new information asset disposal schedule has been provided to the PRSA Assessment Team. This appears appropriate for the needs of the authority, recording the date on which records are destroyed and the method of destruction, and along with the evidence of certificates of destruction from commercial companies, provides a record of destructions. If this were a statutory submission it is likely that this would be assessed as</p>

				identified a gap in provision (the lack of measures to record the destruction of records) and has shown a commitment to closing this gap. This agreement is dependent upon the Keeper being informed of progress as this work moves forward.		compliant and would be given a Green rating.
7. Archiving and Transfer	A	A	A	The Keeper can accept that there are arrangements in place to allow CSVJB to archive the statutory records it is required to create. The RMP states that CSVJB intends to develop a Memorandum of Agreement for the transfer of records selected for permanent preservation to Falkirk Council Archives. This will be a matter for agreement between CSVJB and the archive but records such as the minutes of Board Meetings and Management Team Meetings should be considered for archiving due to their potential historical interest. CSVJB's retention schedule currently identifies Board papers as being retained indefinitely. The disposal method currently states 'None'. The Keeper recommends that this is changed to 'Send to Archives' similar to that action identified for Printed Valuation Rolls. This should also be the case for other records which	Falkirk Council who currently archive minutes of CSVJB Board meetings have agreed to provide additional archiving facilities for other records selected for permanent preservation such as Management Team Meetings. The memorandum of agreement has however yet to be agreed.  Retention schedule amended to show Board Papers and Management Team Minutes disposal method as 'Send to Archives'. (evidence 0.06R)	It is positive to hear that there is an agreement by an archives repository to accept records of enduring value and the Team look forward to receiving a copy of a formal Memorandum of Understanding in due course. This Memorandum of Agreement should take into account the Keeper's Supplementary Guidance on Proper Arrangements for Archiving Public Records. <a href="https://www.nrscotland.gov.uk/record-keeping/public-records-scotland-act-2011/resources">https://www.nrscotland.gov.uk/record-keeping/public-records-scotland-act-2011/resources</a>  Please note also the comment at Element 5.  This element remains Amber until a formal signed agreement can be provided

				<p>need to be transferred to an archive, such as Management Team Minutes possibly. As mentioned above the final decision on what material is sent to an archive will be as a result of discussions between CSVJB and the selected archive. The Keeper, however, requests that at the time of the next revision of the Retention Schedule that this is amended to clarify those records which are transferred to an archive.</p> <p>The Keeper can agree this Element on an 'Improvement Model' basis. This means that the authority has identified a gap in provision (the need to identify records which need to be transferred to an archive and a formal agreement with a suitable archive for transferring records selected for permanent preservation) and has evidenced a commitment to closing this gap. As part of this agreement the Keeper requests that he is sent a copy of the Memorandum of Agreement between CSVJB and the archive once it has been finalised and agreed.</p>		<p>but clearly there is good progress towards compliance in this element.</p>
8. Information Security	<b>G</b>	<b>G</b>	<b>G</b>	Update required on any change.	The following policies were reviewed and updated in October 2018:	Achieving Cyber Essentials Plus accreditation demonstrates good

					<p>i) Acceptable Use Policy  ii) Building Security Procedure  iii) Electronic Communications Policy  iv) Password Policy  v) Security Incident Reporting &amp; Management  vi) User Account Management</p> <p>In addition a new Vulnerability Management Policy was introduced in October 2018. (evidence 0.08R)</p> <p>CSVJB also achieved Cyber Essentials Plus accreditation in 2018. (Evidence 0.9R) and have now also signed up to the Scottish Government Cyber resilience framework.</p> <p>A draft project initiation document has been prepared for email minimisation and management with a view to minimising the number of email records stored and ensuring that emails are only retained where there is a business need to do so. (evidence 0.10R)</p>	<p>progress and the maintenance of this level should assist the authority in keeping its information secure.</p> <p>The PRSA Assessment Team have been provided with a copy of the Vulnerability Management Policy which provides assurance that IT vulnerabilities are being appropriately identified and addressed.</p> <p>The positive steps being taken to manage emails not only will assist with good information security but should also make it easier for staff to comply with the retention and disposal schedules. It is good practice to use improvements in one element to enhance compliance in other elements.</p>
9. Data Protection	<b>G</b>	<b>A</b>	<b>G</b>	Although the authority attained an improvement model agreement at the time of submission, as with all	There have been significant changes since the introduction	These updates are noted with thanks. The changes are all best practice in

				<p>other Scottish public authorities, Central Scotland Valuation Joint Board have been required to review and update their data protection procedures in light of the 2018 legislation. The Assessment Team would welcome a statement referring to the authority's response to GDPR/DP2018</p>	<p>of GDPR/DP2018 in May 2018. These include the following:</p> <ul style="list-style-type: none"> <li>i) Appointment of an external DPO</li> <li>ii) Separate registrations now in place for Central Scotland Assessor and Electoral Registration Officer (<b>ZA500446</b>) and Central Scotland Valuation Joint Board (<b>Z7353775</b>).</li> <li>iii) The Assessor, Assistant Assessor and Principal Administration Officer have all successfully completed the Practitioners Certificate in Data Protection course and examinations.</li> <li>iv) Line Managers have all received external Data Protection Training.</li> <li>v) GDPR training has been provided to all staff who are also now required to undertake annual GDPR/Data Protection and Information Security Training.</li> <li>vi) Privacy Notices, updated Data Protection Policy, Data Breach Procedures and our</li> </ul>	<p>relation to the Data Protection Act 2018 and GDPR and are to be expected from an organisation which deals extensively with personal information. Collaboration with other Assessors and Valuation Joint Boards is very welcome as this benefits all participating authorities and enables informal bench-marking and shared learning.</p> <p>The completion of extensive training by all staff and the on-going commitment to this training is commendable</p>
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					<p>Policy Statement on Special category Data are all available on CSVJB's website:  <a href="https://www.saa.gov.uk/central/privacy-notices/">https://www.saa.gov.uk/central/privacy-notices/</a>  &amp;  <a href="https://www.saa.gov.uk/central/freedom-information-data-protection/">https://www.saa.gov.uk/central/freedom-information-data-protection/</a></p> <p>vi) CSVJB continue to work with other Assessors to ensure that obligations under GDPR/DP2018 are met including the implementation of appropriate Data Sharing Agreements. The Assistant Assessor is also a member of the SAA Governance Committee whose remit includes information governance such as records management and data protection issues.</p>	
10. Business Continuity and Vital Records	G	G	G	Update required on any change.	<p>CSVJB's Business Continuity Plan is regularly reviewed and last updated in June 2018. (Evidence 0.11R).</p>	<p>The authority are demonstrating best practice in the regular review and updating of their Business Continuity Plan, which is an excellent example of a clear, well-thought out Plan that considers both information (data) and knowledge including succession planning.</p>

11. Audit Trail	<b>A</b>	<b>G</b>	<b>A</b>	<p>The RMP states that the roll-out of the BCS across the organisation will assist with the consistent naming of files and the application of version control. CSVJB are also in the process of restructuring their electronic files on the shared drives in line with the requirements of the BCS. This is part of preparation for the implementation of an EDMS, which in turn will further assist with audit trail provision for electronic records. A Working Group has been set up to manage this project. CSVJB has submitted a Progress Report for the work of this project as at March 2018 (evidence 030A). The EDMS was due for a soft launch in April 2018 and the Keeper would be interested to find out how the system is operating at an appropriate time after full roll-out as well as the more consistent application of file names and version control.</p> <p>The RMP states that CSVJB currently manages around 150,000 paper files. The RMP states that CSVJB are currently undertaking a project to scan all domestic and non-domestic property files. These digitised files will then be managed using the EDMS (SharePoint). This</p>	<p>Significant progress has been made with the implementation of SharePoint as CSVJB's EDMS. The soft launch of SharePoint has now taken place with a SharePoint splash page now replacing the former Staff Intranet page (evidence 0.01R). In addition there is now a clear structure in place for the migration of all remaining documents from network drives into SharePoint (evidence 0.02R to 0.05R). This structure reflects the draft CSVJB BCS.</p> <p>Application of file naming and version control will be discussed at a meeting of the SharePoint implementation group in September.</p> <p>Significant progress has been made with the scanning of paper files with all Council Tax property records, rent and return of information forms and appeal files now scanned and electronic copies stored within Best Value, our core operating system. This has proved particularly beneficial to the valuation team where all Council Tax property information and Non-domestic</p>	<p>The choice of SharePoint is a business decision for the authority. It is clear that good progress is being made in implanting this decision and therefore also in making use of the audit trail capability of this software. The development of a clear structure using the Business Classification Scheme is good practice and should ensure as smooth a transition as possible.</p> <p>The scanning of all paper files has significant benefits for working practice. The Assessment Team would encourage consideration of arrangements for the long-term digital preservation of these records so that the information remains available, authentic and reliable for as long as the authority requires them.</p> <p>The development of procedures and guidance on emails is good practice and relevant to progress in a number of Elements. The</p>

				<p>has an estimated completion date of March 2020. An update on progress to date in the form of a Gant chart has been supplied (evidence 053) has been supplied and the Keeper thanks CSVJB for this update. The remaining paper files will diminish as the project moves forward but CSVJB is actively considering implementing a file tracking system. The Keeper requests that he is kept informed of the progress of this initiative.</p> <p>The Keeper can agree this Element on an 'Improvement Model' basis. This means that the authority has identified a gap in provision (the lack of a process for tracking the movement of paper records) and has evidenced a commitment to closing the gap. This agreement is dependent upon the Keeper being kept informed of the progress of this work.</p>	<p>rental and return of information documents are now held together with the individual property record. This has had the benefit of both saving staff time and assisting with process of retrieval of documents relating to an individual or property. An additional benefit is that the future floor space requirement for the office has been significantly reduced.</p> <p>The next stage in the scanning project is the scanning of Non-domestic property records.</p> <p>Additionally a project initiation document is currently being prepared for email minimisation and management with a view to minimising the number of email records stored and ensuring that emails are only retained where there is a business need to do so. (Evidence 0.12R). The intention is that retained emails are to be stored either against the individual property record where applicable or on SharePoint rather than in Outlook. This will assist with identification and retrieval of email documents where required.</p>	<p>proposed system of storing emails alongside relevant records is sensible and should encourage good management of the records and appropriate retention and disposal practices.</p>
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12. Competency Framework	<b>G</b>	<b>G</b>	<b>G</b>	Update required on any change.	The Assessor, Assistant Assessor and Principal Administration Officer have all successfully completed the Practitioner in Data Protection courses and examinations. iv) Line Managers have all received external Data Protection Training. v) GDPR training has been provided to all staff who are now required to undertake annual GDPR/Data Protection and Information Security Training.	CSVJB is ensuring that all relevant staff, including its most senior staff have appropriate training in data protection, to enable full compliance. This is commendable and demonstrates commitment to supporting the professional development of all staff.
13. Assessment and Review	<b>G</b>	<b>G</b>	<b>G</b>	CSVJB is considering the possibility of forming an Information Governance Working Group in order to report to the Management Team on records management and Data Protection matters. The Keeper commends this consideration and requests that he is kept up-to-date with developments in this area.	Records Management and associated policies and procedures continue to be a standing item on Management Team Meeting Agendas.	Embedding regular reviews into business as usual is best practice and ensures that any issues are quickly identified and can be dealt with appropriately.
14. Shared Information	<b>G</b>	<b>G</b>	<b>G</b>	Update required on any change.	A number of additional data sharing agreements (DSA), data processing agreements (DPA) and information sharing protocols (ISP) have been signed since 2018 submission of RMP.	It is to be expected that new agreements will be required from time to time and CSVJB are continuing to ensure the secure sharing of data where required.

## 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 6 September 2019. The progress update was submitted by Jane Wandless, Assistant Assessor.

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

### PRSA Assessment Team's Summary

The Assessment Team has reviewed **Central Scotland 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

Central Scotland Valuation Joint Board continues to take its records management obligations seriously and is working to bring all elements into full compliance. The commitment to staff training and development is particularly commendable and it is very encouraging to see that this includes the most senior staff of the authority. There is steady progress in implementing the authority's preferred software for managing electronic records and it is to be expected that this project will take a number of years to complete.

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. If this were a statutory submission it is likely that Element 6 would receive a Green rating. The work on Elements 4 and 11 shows steady progress towards a Green rating and it is likely that this will be achieved once the authority's preferred EDMS is fully implemented.

Where 'no change' has been recorded under the update on provision by the authority, the Assessment Team is happy to agree that these elements require no further action for the time being.

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

Based on the progress update assessment the Assessment Team considers that **Central Scotland 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,



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**Elsbeth Reid**  
Public Records Officer