Public Records (Scotland) Act 2011

Records Management Plan

Review 2017

Key Information:

Title:	*RMP review 2017 1.1*
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0.2	*10/03/17*	*Added intro*	*CG*
0.3	*16/3/17*	*Completed structure*	*CG*
0.4	*11/8/17*	*Rewrote to incorporate PUAR and Internal Audit review*	*CG*
0.5	*22/8/07*	*Filled out examples*	*CG*
0.6	*27/9/07*	*Included ref. to GDPR in intro*	*CG*
1.0	*28/11/07*	*Fixed typos, filled out PUAR section. Added appendices*	*CG*
1.1	*29/11/17*	*Minor text amendments; added future progress section*	*CG*

Introduction

The Public Records (Scotland) Act 2011 requires all public authorities to develop and maintain a Records Management Plan (RMP) which sets out how the authority will create, maintain and dispose of its recorded information.

East Renfrewshire Council submitted our RMP to the Keeper of the Records of Scotland in December 2015 and this was approved in May 2016 when the Keeper commended the Plan as "an example of good practice". The plan is available on the Council's website at: http://www.eastrenfrewshire.gov.uk/records-management

The Plan consists of 14 elements, covering everything from information security to retention scheduling. Element 13 of the Plan covers "assessment and review" and the Council undertook to review the operation and implementation of the Plan periodically.

This present document constitutes the first of these reviews. It considers strengths and weaknesses of the plan and examines its adoption across the Council.

The review has been undertaken in parallel with work carried out by the Council's internal audit section and also with the review mechanism being developed by the National Records of Scotland. Documentation from these reviews are included as an appendix to this report.

Review of the RMP

Throughout 2017 the content and structure of the RMP was reassessed. All links were verified and test on each subpage was amended as appropriate. Additionally, all the documents forming part of the plan were checked, errors corrected and updates made.

There has been an on-going process of reviewing the core documentation within the RMP. The Retention Schedule, for example, has had multiple additions and amendments, and guidance notes on email management, using the records store, etc. have been reviewed and revised.

A number of documents which had been in the RMP at the time of submission to the Keeper had been included primarily for the purpose of providing evidence as part of the approval process. These had little ongoing significant records management utility and have been removed from the scheme.

As part of the review process, related pages which fell outwith the particular focus of records management (for example the data protection and FoI pages) were also checked and updated.

Implementation

The records team were keen that the plan should be a practical and useful set of principles, documents and guidance, rather than aiming to simply achieve compliance. To that end, its construction was informed by a Records Management Working Group and after adoption

the Plan was promoted through the "rotator" on the front page of the intranet and through the Insider magazine.

Across the Council, records management developments have progressed well since the adoption of the Plan. For example, in late 2016 the Environment Department carried out a "Dump the Junk" programme. This involved the imposition of the corporate retention schedule on records in the Spiersbridge offices and in the stores at Thornliebank and allowed the Department to identify and securely dispose of 410 linear metres of records, and 217 archive boxes from the store.

Audit

Element 13 of the Council's approved Record Management Plan contains a requirement to review and update the plan. In addition to this present review, Internal Audit agreed to examine the operation of the Plan and to produce an improvement action plan.

The Audit report, and Legal Services' action plan thereon, are included as appendices 1 and 2 to this present report.

PUAR

Throughout 2017, the National Records of Scotland have been developing a "self-assessment toolkit". It is hoped that this will be a tool that allows authorities to keep their Records Management Plans current and accurate without having to go through the full resubmission exercise. East Renfrewshire Council volunteered to be a pilot exercise in this process and completed the process in August 2017.

The final PUAR assessment with the Keeper's response is included as appendix 3 to this report.

Future work

The Council continues working towards better information governance. Through the work of Legal Services, the Information as an Asset Board, and the Information and Communications Technology section, the Council are developing new records management tools - such as the Open Data portal - and improving existing ones such as the Information Asset Register. New systems, such as Legal's Iken records management system are being adopted and work on the safeguarding and use of the Council's historic archives continues.

Appendices:

1   *Audit report*

2   *Audit action plan*

3   *PUAR final report*

APPENDIX 1

REPORT ON RECORDS MANAGEMENT PLAN

Chief Auditor
MB/1004/RM
27 April 2017

East
Renfrewshire
COUNCIL

REPORT ON RECORDS MANAGEMENT PLAN

1. INTRODUCTION

Under the Public Records (Scotland) Act 2011, councils had to develop and maintain a Records Management Plan (RMP) setting out the arrangements for management of their records. East Renfrewshire Council's plan was approved in June 2016. The plan contains 14 elements including destruction arrangements and retention schedule. The mechanism for establishing the plan was approved by the corporate management team on 13 January 2015.

During 2016/17, an audit of the plan was undertaken and focussed on the disposal policy and retention schedule. It is intended that other elements of the plan may be audited in the future.

This is the first occasion that the Records Management Plan has been reviewed by Audit. As stated in the records management policy, good records management ensures efficiency in the creation, storage and use of information. It allows the maximisation of corporate knowledge while maintaining appropriate security. It ensures that information can be retrieved and used when it is required, and that it is accurate, authentic and reliable. Proper management also means that records are retained only as long as they are required but that information of a long-term archival value is kept as the permanent corporate memory of the Council.

2. SCOPE

The scope of the audit was to ensure that:

- The Records Management Plan is easily accessible to all staff who have been adequately informed as to its existence, location and importance of compliance.
- The Records Management Plan retention schedule and disposal policy is being adhered to.
- Electronic records retention periods are complied with in the same way as for manual records.
- The Records Management Plan is being reviewed in accordance with the specified review dates.

For the purposes of the audit, a sample of five services across the Council was selected at random, however the findings from these could apply equally to all services.

3. GENERAL CONCLUSION

The extent to which the RMP covers Council partners requires clarification. If it is to cover the Leisure Trust, this should be included in the service level agreement.

Verification of each department's content within the retention schedule could be strengthened and formalised. Retention schedules that services have established are not compatible with the corporate retention schedule. There is scope for enhancement of the control of proof of destruction certification.

4. FINDINGS AND RECOMMENDATIONS

4.1 Extent of coverage of Records Management Plan (RMP)

It is unclear whether the Council's external partners, Integrated Joint Board (IJB) and the Community and Leisure Trust, are included in the Council RMP or whether they require to have their own plan. The current RMP includes records under the headings of Adult Care Services, Childhood & Family, Criminal Justice and Leisure & Culture.

Some of the HSCP officers contacted as part of the audit and closely involved with Care First which is becoming the main system of records storage were unaware that there was a Council-wide finalised Records Management Policy. It is understood that nothing has been deleted from the Care First system which is used by HSCP for most record storage now. The Performance and Audit Committee of the IJB of 29 March 2017 received an update stating that an RMP for the IJB specifically is not in place as no invitation to establish one has been received from the Keeper of the Records of Scotland. An NHS Partnership Records Management Group has now been created and will be tasked with consideration of an RMP.

Recommendation

> *4.1 The extent of coverage of the Council RMP should be clarified as to whether any separate approval is required for the Leisure Trust and the IJB and the form this would take. The next review of the RMP should make clear which services are covered.*

Action: Chief Officer, Legal and Procurement

4.2 Disposal of equipment

The Disposal Policy states that the Council has a contract with Re-Tek covering the sale of redundant IT equipment. It is a condition of the contract that any information contained on hard drives is destroyed and a certificate of proof returned to the Council in compliance with the Data Protection Act. Similarly Media Resources Ltd have a contract with the Council to decommission from live use any media deemed to be beyond its useful life. Again appropriate destruction certificates are to be provided.

The inventory was checked for each of the services in the audit sample for any disposals of computer equipment. Most were noted as having been removed by ICT or transferred to another part of the department or service. However, in one of the services in the audit sample, two items were noted as having been removed specifically by Re-Tek, a laptop and a monitor. A certificate was provided in respect of the date and location of the uplift but the supporting schedule showing all of the equipment covered by this certificate did not include the laptop in question. It was thought by the ICT officer that this was due to the serial number and make being incorrectly recorded on the inventory.

Recommendation

> *4.2.1. A check should be carried out by ICT to ensure that certificates of destruction include all equipment which was collected from council premises by the contractor.*

Action: Director of Corporate and Community

4.3   Verification of RMP content and raising profile

A sample of five services within departments was selected at random from across the Council and a selection of their records were checked for compliance with retention periods. It was found that of 25 record types checked across the sample, seven were not agreed to by the officer spoken to, either in terms of the documentation listed or the retention period established. In one of these cases, the senior officers contacted were unaware that there was a finalised RMP in existence at all. The departmental representatives on the now discharged Records Management Working Group were asked to ensure that the content relating to their department was checked, however possibly this was done more assiduously within some departments than others. Specifically, it was thought by officers contacted that there was some duplication of records listed, there were records held within the service but not shown in the retention schedule and there was no reflection of where computerisation has replaced manual forms. The RMP already contains provision for staff suggesting amendments to the schedules of data held to ensure accuracy. Establishing a sign-off process at say Head of Service level would help to ensure wider awareness of the RMP and would provide enhanced verification of content.

There is an e-learning module within insider e-learning but the Records Manager stated that the content is rather light at the moment and could benefit from a review. Other e-learning modules have in the past been made compulsory for all Council employees such as data protection and information security.

Recommendation

4.3.1 The next review of the RMP should include each category of service indexed being given an opportunity to verify that the records listed are held and the retention periods are valid.

4.3.2 Consideration should be given at the next review to request sign-off by each Head of Service of the content relating to their service. Alternatively a co-ordinator representative could be re-established within each department.

4.3.3 Following the review, the profile of the RMP should be raised throughout the Council, eg by way of regular rotator reminder articles on the intranet or an annual e-mail sent to all ERC employees in the same way as for declaration of interests. Particular emphasis should be placed on the ability of services to request changes to their data and that the retention schedule applies to all records regardless of the format in which they are held.

4.3.4 Consideration should be given to reviewing and improving the Records Management module on insider e-learning and then mandating as compulsory.

Action: Chief Officer, Legal and Procurement

4.4   Electronic storage of records

Many Council records are now being stored electronically rather than in paper format and this trend is likely to continue and expand. Some Council officers contacted as part of the audit appeared to think that where there was electronic storage of a type of document, the retention period did not apply. While the retention schedule guide states that it applies to all records in any medium, including paper and digital, it could be added as a principle of records management within the records management policy so that this is highlighted more prominently.

A substantial proportion of council data is now held within main systems such as payroll, council tax, benefits, information at work etc. Council systems do not currently use an automatic archiving or deletion facility or one where the administrator would be prompted to either authorise or refuse a deletion option.

Recommendation

4.4 1 The next review of the RMP should include a particular focus on electronic storage and the extent to which the RMP applies in this area should be made clear recognising that some systems do not currently have or use a facility for deletion of records. The records Management Policy should include this as one of the principles of records management.

4.4.2 Council systems should incorporate where appropriate a facility where records are deleted after a specified time period has passed, or prompts the user to allow deletion. Where there is no such facility, future tenders should build in this requirement.

Action: Chief Officer, Legal and Procurement

4.5   Service retention schedules

Some of the services which were included in the audit sample had established their own retention schedule showing documentation held and the length of time each type was to be retained. These were at variance with some of the retention periods stated in the corporate schedule. Several variances were found between the two with no explanation shown.

Recommendation

4.5 The Records Manager should remind all services that any retention schedule established by an individual service should be compatible with the corporate schedule or should explain the reason for any differences.

Action: Chief Officer, Legal and Procurement

4.6   Review dates

The review date shown on the front of the retention schedule states that it was to have been reviewed on 31/12/16 but this has not been done.

There are other elements within the Records Management Plan where the review date has passed in some cases by a long time, such as the Information Security Policy which although stating that it will be subject to annual review, has not been reviewed since September 2014. The Information Security Policy includes the requirement of the Information Security Forum to meet at least twice a year to review security within departments, however the most recent meeting of the Forum was in June 2016. Another example is the Business Classification Scheme which was due for review in September 2016.

Three formal reviews of the RMP are scheduled to take place, the first of these was to take place six months after the National Records of Scotland granted formal approval which was in June 2016.

Recommendation

> *4.6 All elements of the Records Management Plan where the review date has passed should be reviewed in terms of content as soon as possible and evidence held of the review.*

Action: Chief Officer, Legal and Procurement

4.7   Council headquarters basement store

Although not strictly part of the Records Management Plan, as part of the audit, the basement store at Council headquarters was visited to assess suitability for storing records.   A staff member who is tasked with maintaining records stored there commented that visiting the store was an unpleasant experience as it is dark and some of the boxes have spiders and insects etc. It was noted that the store is untidy with records being maintained by several services in some cases long past the retention period. The store area has also been subject to flooding in the past.

Recommendation

> *4.7 All departments who have records stored in the basement store at Eastwood headquarters should be requested to clear out any which are being held beyond the applicable retention period and tidy that area of the store where they keep records to minimise the data stored at this location.*

Action: Chief Officer, Legal and Procurement

Chief Auditor
27 April 2017

ACTION PLAN for MB2014RM: Chief Officer (Legal and Procurement)

Item	Action Point	Responsibility	Task	Notes	Action by	Date due	Progress	Status
4.1	*The extent of coverage of the Council RMP should be clarified as to whether any separate approval is required for the Leisure Trust and the IJB and the form this would take. The next review of the RMP should make clear which services are covered.*	**Action: Chief Officer, Legal and Procurement**	Take a view after consultation with the Keeper Trust and IJB	The Keeper is currently considering the issue of IJB RMPs and will advise in due course	GM and CG	summer '17	meeting with IJB 8/11 to clarify their requirements	(orange)
4.2	*A check should be carried out by ICT to ensure that certificates of destruction include all equipment which was collected from council premises by the contractor.*	*Action: Director of Corporate and Community*						(grey)
4.3.1	*The next review of the RMP should include each category of service indexed being given an opportunity to verify that the records listed are held and the retention periods are valid.*	**Action: Chief Officer, Legal and Procurement**	CG to draft communication for GM advising accordingly		CG	26/05/2017	email for Gerry drafted 31/5; amended 11/8 to incorporate 4.5 below. Sent 14/8	(green)
4.3.2	*Consideration should be given at the next review to request sign-off by each Head of Service of the content relating to their service. Alternatively a co-ordinator representative could be re-established within each department.*	**Action: Chief Officer, Legal and Procurement**	as above		CG	26/05/2017	emailed Gerry 1/6; consideration given.	(green)
4.3.3	*Following the review, the profile of the RMP should be raised throughout the Council, eg by way of regular rotator reminder articles on the intranet or an annual e-mail sent to all ERC employees in the same way as for declaration of interests. Particular emphasis should be placed on the ability of services to request changes to their data and that the retention schedule applies to all records regardless of the format in which they are held.*	**Action: Chief Officer, Legal and Procurement**	CG to liaise with Comms to raise profile.		CG	30/06/2017	emailed Emma Edwards 7/7; sent text 11/8. Rotator article used	(green)
4.3.4	*Consideration should be given to reviewing and improving the Records Management module on insider e-learning and then mandating as compulsory.*	**Action: Chief Officer, Legal and Procurement**	CG to draft amendments to training and then liaise with HR to implement		CG	Autumn 2017	confirmed HR contact 15/11	(red)
4.4.1	*The next review of the RMP should include a particular focus on electronic storage and the extent to which the RMP applies in this area should be made clear recognising that some systems do not currently have or use a facility for deletion of records. The records Management Policy should include this as one of the principles of records management.*	**Action: Chief Officer, Legal and Procurement**	Amend Policy	Review retentioning of electronic systems during mid-term review or as part of PUAR.	CG	26/05/2017	policy amended 2/6	(green)
4.4.2	*Council systems should incorporate where appropriate a facility where records are deleted after a specified time period has passed, or prompts the user to allow deletion. Where there is no such facility, future tenders should build in this requirement.*	**Action: Chief Officer, Legal and Procurement**	liaise with IT and procurement	PUAR is the Keeper's new self-assessment mechanism	CG	summer 2018	agreed procedures with IT and Procurment	(green)
4.5	*The Records Manager should remind all services that any retention schedule established by an individual service should be compatible with the corporate schedule or should explain the reason for any differences.*	**Action: Chief Officer, Legal and Procurement**	draft email for GM to send to all Heads of Service on this issue		CG	26/05/2017	included reference to this in draft email sent to Gerry 11/8	(green)
4.6	*All elements of the Records Management Plan where the review date has passed should be reviewed in terms of content as soon as possible and evidence held of the review.*	**Action: Chief Officer, Legal and Procurement**	all elements of the Plan are currently being checked with accuracy and currency		CG	26/05/2017	completed 25/5. Only outstanding items are info Sec; the RMP has the most up-to-date items available.	(green)
4.7	*All departments who have records stored in the basement store at Eastwood headquarters should be requested to clear out any which are being held beyond the applicable retention period and tidy that area of the store where they keep records to minimise the data stored at this location.*	**Action: Chief Officer, Legal and Procurement**	survey of store to determine ownership of records		CG	23/06/2017	surveyed store 9/7. Legal records removed from floor as per JMcK's message	(orange)
			contact relevant Heads of Service, remind them of records requirements.		CG	30/06/2017	drafted email for GM; spoke to departmental reps.	(green)
							Last updated:	15-Nov

The Public Records (Scotland) Act 2011

East Renfrewshire Council
East Renfrewshire Licensing Board

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

29 June 2017

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 record keeping 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 Final 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 **East Renfrewshire Council** and **East Renfrewshire Licensing Board**. The outcome of the assessment and relevant feedback can be found under sections 6 – 8.

4. Authority Background

East Renfrewshire is one of 32 council areas of Scotland. Until 1975 it formed part of the county of Renfrewshire for local   government purposes along with the modern council areas of Renfrewshire and Inverclyde. Although no longer a local

authority   area, Renfrewshire still remains the registration county and lieutenancy area of East Renfrewshire.

The East Renfrewshire local authority was formed in 1996, as a successor to the Eastwood district, along with Barrhead, which   came from Renfrew district. It borders onto the City of Glasgow, East Ayrshire, North Ayrshire, Renfrewshire and South   Lanarkshire.

http://www.eastrenfrewshire.gov.uk/

The East Renfrewshire Licensing Board handles the administration of a range of licences. The Board is constituted as an   independent regulatory body by virtue of Section 5 of the Licensing (Scotland) Act 2005.

The main function of the Board is to regulate premises that sell alcohol to the public. The Licensing Board is also required by the   Gambling Act 2005 to regulate certain gambling activities within the Council area.

The board is made up of five councillors with various temporary licences granted under powers delegated to appointed East   Renfrewshire Council officers, and all licensing fees are put back into the council to fund the licensing system which is entirely hosted and administered by council employees.

http://www.eastrenfrewshire.gov.uk/article/2074/Licensing-Board

5. Assessment Process

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

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

Engagement with the PUR mechanism for assessment cannot alter the Keeper's Assessment Report of an authority's agreed RMP or any RAG assessment within it. Instead the PUR Final Report records the Assessment Team's evaluation of the submission and its opinion on the progress being made by the authority since

agreeing its RMP. The team's assessment provides an informal indication of what marking an authority could expect should it submit a revised RMP to the Keeper under the Act, although such assessment is made without prejudice to the Keeper's right to adopt a different marking at that stage.

Key:

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

6. Records Management Plan Elements: Checklist

East Renfrewshire Council and East Renfrewshire Licensing Board

Element	Status of elements under agreed Plan, May 2016	Status of evidence under agreed Plan, May 2016	Progress assessment status, Jun-17	Keeper's Report Comments on Authority's Plan, May-16	Self-assessment Update as submitted by the Authority since May-16	Progress Review Comment – June 2017
1. Senior Officer	G	G	G	Update Required on any Change	No change	No immediate action required. Update required on any future change
2. Records Manager	G	G	G	Update Required on any Change	No change	No immediate action required. Update required on any future change
3. Policy	G	G	G	Update Required on any Change	No change	No immediate action required. Update required on any future change
4. Business Classification	G	G	G	Update Required on any Change	No change as yet, although a new Information Asset Register is in the early stages of development. It remains unclear how far this will subsume the role of the BCS; further details will be made available in due course.	The Assessment Team commends the planned development of a new Information Asset Register and would welcome future updates concerning its role and its impact on the current Business Classification Scheme.

					Should substantial changes occur in relation to the existing BCS the Assessment Team would like to be informed of these. The Assessment Team recognises the on-going initiative being undertaken by the authority under this element.
5. Retention Schedule	G	G	G	Update Required on any Change	Multiple minor revisions and amendments. Updated version available on the RS page of the RMP online	The Keeper's Report recognised that this authority's retention schedule is a 'living' document which should rightly be amended as record-creating activities change. The Assessment Team therefore commends the revisions and amendments undertaken and which are reflected in the comprehensive retention schedule which has been published online at http://www.eastrenfrewshire.gov.uk/CHttpHandler.ashx?id=14286&p=0. The authority's commitment to the regular review of the Retention Schedule (next review date: 31/12/2017) and the accompanying Retention Schedule Guide (next review date: 15/04/2018) is also welcomed.

						The Assessment Team welcomes the insertion of a warning within the published retention schedule not to destroy records which may fall within the scope of the 'Scottish Child Abuse Inquiry'.
						The Assessment Team recognises the on-going initiative being undertaken by the authority under this element.
6. Destruction Arrangements	G	G	G	Update Required on any Change	No change	No immediate action required. Update required on any future change
7. Archiving and Transfer	G	G	G	Update Required on any Change	No change	No immediate action required. Update required on any future change
8. Information Security	G	G	G	Update Required on any Change	No change as yet, but policies and procedures are currently being reviewed by Info Security Officer	The regular review of policies and procedures is admirable and is regarded as fulfilling the expectations under the Act for authorities to engage in continuous review and improvement.

The Assessment Team consider that the Information Security Officer is the most suitable individual to conduct this review.

Should changes occur as a result of this review the Assessment Team would like to receive updates. |

	G	G	G			The Assessment Team recognises the on-going initiative being undertaken by the authority under this element.
9. Data Protection	G	G	G	Update Required on any Change	No change as yet, but policies and procedures are currently being reviewed by Legal Services in light of the imminent GDPR	The Assessment Team consider the introduction of GDPR in 2018 as likely to have a significant impact on data protection policies and guidance. This authority is rightly considering this impact at an early stage by undertaking a review through their Legal Services department. The updated versions of these data protection policies should be submitted in future updates should substantial changes occur as a result of this review.

The Assessment Team recognises the on-going initiative being undertaken by the authority under this element. |
10. Business Continuity and Vital Records	G	G	G	Update Required on any Change	No change	No immediate action required. Update required on any future change
11. Audit Trail	G	G	G	Update Required on any Change	No change	No immediate action required. Update required on any future change
				Update	No	No immediate action required. Update

12. Competency Framework	**G**	**G**	**G**	Required on any Change	change	required on any future change
13. Assessment and Review	**G**	**G**	**G**	The Keeper requests that the Council provide him with updates to the named documents as they become available, in order that he may keep the authority's submission up-to-date.	All of the specified documents forming part of the RMP submission have been checked for accuracy and currency, with amendments and reviews as appropriate. All are now up-to-date (with the exception of DP and Security; see notes above). With regard to the first review as specified in our submission, this has been rolled in with the Internal Audit review of the RMP (see para below).	The Assessment Team commends the assessment and review of the policies and guidelines which accompany the RMP and which are vital for ensuring proper records management provisions. The authority should be especially congratulated on their on-going commitment in publishing these updated policies and documents on the RMP pages of their website at http://www.eastrenfrewshire.gov.uk/records-management-policy.

The Assessment Team believes that undertaking an internal audit to complement this first review of the authority's record management provisions is a wholly suitable and logical approach.

Internal audit are currently reviewing the operation and implementation of the RMP. Their report, and the initial response and action plan thereto, are included for information with this present submission.

The submission of the *Internal Audit Report on Records Management Plan* and *Action Plan* are indicative of this authority's strong commitment to continuous improvement. Particularly welcome are the recommendations of the internal audit to raise the profile of the RMP within the organisation by improving staff training and awareness. It is also clear that the authority is considering giving greater attention to the issue of the deletion of records in line with the retention schedule, the validity of the retention schedule timetable, and the storage and deletion of electronic records. The Assessment Team would welcome future updates on these developments.

The internal audit also raised the issue of missed policy review deadlines and has stated the need to conduct these reviews as soon as possible.

						Should any substantial changes occur following future reviews the Assessment Team requests to be informed of these and to be supplied with the updated documentation.
						The Assessment Team recognises the on-going initiative being undertaken by the authority under this element.
14. Shared Information	G	G	G	Update Required on any Change	No change	No immediate action required. Update required on any future change

<u>Version</u>

The progress update submission which has been assessed is the one received by the Assessment Team on 18 May 2017. The author of the progress update submission is Craig Geddes, Council Records Manager.

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

7. PRSA Assessment Team's Summary

The Assessment Team has reviewed **East Renfrewshire Council** and **East Renfrewshire Licensing Board** 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.

<u>General Comments</u>

This authority shows strong, continuing commitment to maintaining and improving upon their records management provisions. This is illustrated by their regular review of key policies and documentation.

The authority is to be commended for the publication, where appropriate, of their record management policies and accompanying documentation on their website. The Assessment Team considers this an effective way of demonstrating compliance and publicising on-going initiatives. This is an approach which we would recommend other public authorities to adopt.

The Assessment Team would welcome future updates following the development of the new Information Asset Register and the updating of policies in light of upcoming legislation such as GDPR.

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. PRSA Assessment Team's Evaluation

Based on the progress update assessment the Assessment Team considers that **East Renfrewshire Council** and **East Renfrewshire Licensing Board** continue to take their statutory obligations seriously and are working hard to maintain all elements of their records management plan in full compliance with the Act and fulfil the Keeper's expectations.

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

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

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Neil Adams
Public Records Officer