Renfrewshire Council

To: Audit, Risk and Scrutiny Board

On: January 2019

Report by: Director of Finance and Resources

Heading: Records Management Plan Update

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1 Summary

1.1 To comply with the Public Records (Scotland) Act 2011 ("PRSA"), the Council created a Records Management Plan ("RMP") to guide continual improvement of its record keeping. The Council's RMP was approved by Council on 25 February 2016 and it was decided that an annual report would be submitted to the former Audit, Scrutiny and Petitions Board.

1.2 Agreement of the RMP was reached with the Keeper of the Records "the Keeper" of Scotland on 16 August 2016.

1.3 On 5 May 2018 the Keeper invited the Council to submit an annual Progress Update Reports ("PUR") on the Council's implementation of its RMP.

1.4 On 27 June 2018 the Council submitted a PUR.

1.5 On 10 October 2018 the Council received the PUR Report from the Keeper.

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2 Recommendations

2.1 To note that the contents of this report and agree that annual reports will continue to be submitted to this Board.

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3 Background

3.1 The PRSA came into force on 1 January 2013. Under the PRSA, named Scottish public authorities are required to manage their corporate records efficiently and effectively. To this end, each of these authorities must submit a formal RMP to the Keeper of the Records of Scotland ("the Keeper") for his approval. The Keeper has published a 'model RMP' that explains the various elements he would expect to see in a public authority RMP. The Council's own RMP is based on this model

3.2 The Council submitted its RMP to the Keeper on 31 March 2016 after being approved by Council on 25 February 2016 and by Renfrewshire Licensing Board on 07 March 2016 as a joint RMP. Conditional agreement from the Keeper was received on 16 August 2016.

3.3 The Keeper has fully accepted 11 out of the 16 elements of the RMP with the remaining 5 elements being on an improvement plan. The full assessment report can be provided by the Records Manager or is available from:

http://www.nrscotland.gov.uk/record-keeping/public-records-scotland-act-2011/assessment-reports

3.4 The Council has until the year 2021 to have its RMP fully agreed with the Keeper. Prior to the 2018 PUR submission, the elements that require agreement were:

1. Element 4 - Business classification
2. Element 6 - Destruction arrangements
3. Element 7 - Archiving and transfer arrangements
4. Element 11 - Audit trail
5. Element 13 - Assessment and review

3.5. The self-assessment review mechanism was announced in the Keeper's 2016 Annual Report and has been developed in partnership with the Stakeholder Forum. Formally launched on 14 December 2016 the PUR mechanism is intended to help authorities demonstrate their

continuing compliance with s.5(1)(a) of the PRSA keep their RMPs under review. It is also an opportunity for authorities to highlight and share with us the advances being made in the provision of their records management services and to receive impartial feedback and advice on those advances by the Assessment Team.

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4. Progress Update Report Findings

4.1. Within the PUR, the Council provided updates on the areas marked as requiring improvement within the original RMP Assessment Report produced the Keeper. The Keeper advised that Elements 6, 11 and 13 were now at Green standard. The Keeper has come back with the following comments. Where appropriate our next steps are noted after the comment.

4.2. **'Element 4 – Business Classification'** – **Remains at Amber**

4.3. 'It is clear that a Business Classification Scheme has now been developed. The use of the Local Government Classification Scheme is sensible, aligning with existing Scottish local authority classifications.

4.4. A gradual approach to rolling out the business classification scheme should ensure that there is more committed uptake of its use. As with most aspects of records management, schemes work best when the staff implementing them can see a benefit to their work and can take ownership of implementing them positively.

4.5. SharePoint and OneDrive should both be structured to implement the business classification scheme to minimise legacy issues over time.

4.6. *The Assessment Team would welcome further updates in future PURs*.'

4.7. It has been agreed that the Business Classification Scheme and Retention Schedule will be added to the Information Management Strategy action plan, aligning it with the principles in the strategy. This will ensure that, where relevant, future IT tender requirements will include the need for Function Classification and Retention Period monitoring functionality. It is anticipated that this will aid our progress to Green status for Element 4.

4.8. **'Element 6 - Destruction arrangements' - Updated to Green**

4.9. 'The Records Disposal Policy (Jan 2018 v1.0) has been provided. The Keeper thanks the Council for keeping its submission up to date. Annual statements of assurance from directors is good practice. Public authorities are at risk of not being able to comply with FOISA if they do not know when, why and on whose authority records have been destroyed. A robust retention schedule which clearly states when

classes of information are destroyed (or preserved) and evidence of that destruction, either by certificate or by procedural documentation made available to staff, with additional evidence of staff training on the importance of proper records, is an acceptable, pragmatic method of complying with Element 6. Sufficient evidence of this has been provided to enable the Assessment Team to consider it likely that if this were a statutory review the RAG status would move to Green.'

4.10. **'Element 7 - Archiving and transfer arrangements' – Remains at Amber**

4.11. *'The Council's Guidelines for Archival Records (Dec 2016 v0.1) has been provided. The Keeper thanks the Council for providing evidence of this development.*

4.12. *The current iteration of the Guidelines do not yet fully cover the gap. It is not clear which records the Heritage Centre is able to accept and the Council's retention schedules appear to indicate that not all records of enduring value are being transferred to the Heritage Centre.*

4.13. *The Assessment Team recommend that in developing the next iteration of the Guidelines, the Council should ensure it has professional archival advice both on preservation and making records accessible to the public through appropriate facilities. The Assessment Team also recommend that the Council consider the Keeper's "Supplementary Guidance on Proper Arrangement for Archiving Public Records" when developing these Guidelines.'*

4.14. The Council archiving processes are currently under review. The new Corporate Records Centre at Wallneuk will help the Council to order and list the archives it holds and to maintain them in a secure and environmentally suitable location. Once this list is complete, relevant guidance and procedures can be put in place to organise how future archive materials are collated and stored.

4.15. '**Element 11 - Audit trail' - Updated to Green**

4.16. *'The ability to maintain an audit trail has been identified in a number of software systems that are in wide use in Renfrewshire Council and other local authorities.*

4.17. *Version control guidance (Feb 2018 v1.0) has been provided. The Keeper thanks the Council for bringing its submission up to date.*

4.18. *As the business classification scheme is rolled out and structured SharePoint and OneDrive systems replace unstructured shared drives, the Team would encourage further use of version control and audit mechanisms including records of destruction. This will assist the Council in ensuring that retention schedules are applied appropriately.*

4.19. *The Assessment Team would welcome further updates in future PURs. The Assessment Team consider that sufficient evidence of progress in this area has been provided to move the RAG status of this element to Green.'*

4.20. **'Element 13 - Assessment and review' - Updated to Green**

4.21. *'Annual reports to a Council Board consisting of Elected Members is very positive and the Council is to be commended for giving records management a high profile in this way. Auditing the Plan is also positive. The Keeper would like to see the assessment methodology that is currently in use.*

4.22. *The Council is also to be commended for making use of the Progress Update Review process as part of their assessment methodology. The Assessment Team consider that sufficient evidence of progress in this area has been provided to move the RAG status of this element to Green.'*

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5 2019 PUR

5.1 Following the 2018 PUR submission and report, the elements that still require agreement are:

1. Element 4 – Business classification
2. Element 7 – Archiving and transfer arrangements

5.2 In preparation for the 2019 PUR, through the Records Management Group, the steps noted in Section 4 will be carried out to progress the two outstanding elements. There will also be a review of the elements marked as Green following the submission of the original RMP in 2016.

Implications of the Report

1. **Financial** – *none*

2. **HR & Organisational Development** – *none*

3. **Community Planning** – Implementing good records management principles within the organisation supports the Council to deliver on its key objectives and priorities.

4. **Legal** – Implementation of the RMP is a key element in complying with the Public Records (Scotland) Act 2011.

5. **Property/Assets** – *none*

6. **Information Technology** – *none*

7. **Equality & Human Rights** - The Recommendations contained within this report have been assessed in relation to their impact on equalities and human rights. No negative impacts on equality groups or potential for infringement of individuals' human rights have been identified arising from the recommendations contained in the report because for example it is for noting only. If required following implementation, the actual impact of the recommendations and the mitigating actions will be reviewed and monitored, and the results of the assessment will be published on the Council's website.

8. **Health & Safety** – *none*

9. **Procurement** – *none*

10. **Risk** – *none*

11. **Privacy Impact** - Effective records management can only have a positive impact on people's privacy whereby records are only retained for as long as necessary and are kept securely.

12. **Cosla Policy Position** – *none*

List of Background Papers

(a) *none*

Author: Andy Connor, Records Manager, tel: 0141 618 5187**,**
Andrew.connor@renfrewshire.gov.uk