CENTRAL SCOTLAND VALUATION JOINT BOARD

Subject: **RECORDS MANAGEMENT PLAN**
Meeting: **CENTRAL SCOTLAND VALUATION JOINT BOARD**
Date: **28ᵀᴴ SEPTEMBER 2018**
Author: **JANE WANDLESS, ASSISTANT ASSESSOR**

1.0   INTRODUCTION

The Public Records (Scotland) Act 2011 (PRSA) came fully into force in January 2013. The Act required Central Scotland Valuation Joint Board, the Assessor and ERO (CSVJB) and other public authorities to prepare and implement a Records Management Plan (RMP).

Records Management is the systematic control of records generated by CSVJB to ensure optimum efficiency of storage, retrieval, disposal or preservation. CSVJB has a statutory responsibility under the Local Government (Scotland) Act 1994 and the PRSA to ensure records created by CSVJB are properly managed.

The RMP sets out the proper arrangements for the management of records within CSVJB. The plan is agreed with the Keeper of the Records of Scotland ('the Keeper') and reviewed by The Board on an annual basis. Section 4 (1) of the Act states that "an authority must submit its proposed records management plan to the Keeper for agreement by such date as the Keeper may determine.

3.0 Progress

The Keeper required The Board to submit its RMP by 31ˢᵗ March 2017. Following this submission the Keeper provided an interim report in February 2018 outlining suggested areas for improvement, following which the final amended RMP was submitted to the Keeper in March 2018.

The Board's RMP was approved by the Keeper on 28ᵗʰ June, 2018. The RMP is attached as **Appendix 1** of this report.

4.0 The Records Management Plan

The RMP followed the Keepers model plan covering 14 elements, each element had to be evidenced and a total of 40 separate items of evidence were submitted to the Keeper. In common with most authorities whose plan has been approved by the Keeper, CSVJB's Plan has been agreed upon on an improvement model basis. The Keepers Assessment Report is attached as **Appendix 2** of this report.

5.0   RECOMMENDATION

The Valuation Joint Board is asked to consider and comment on the Records Management Plan and the Keepers Assessment Report.

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Assistant Assessor

Appendix 1 - Records Management Plan
Appendix 2 – The Keepers Assessment Report

Records Management Plan

Setting out proper arrangements for the management of records under the Public Records (Scotland) Act 2011

March 2017

Document Control

Title	CSVJB Records Management Plan
Who should use this	All Staff
Author	Records Manager – Jane Wandless, Assistant Assessor
Approved by Management Team	March 2017
Approved by Joint Board	To be reported to Board for noting following approval by NRS
Reviewer	Assessor & Electoral Registration Officer
Review Date	March 2019

Review History

REVIEW NO.	DETAILS	RELEASE DATE
1	Revised following interim report	March 2018
2		
3		
4		
5		
6		

CSVJB Records Management Plan

Covering Statement

This is the Records Management Plan for Central Scotland Valuation Joint Board which has been prepared in accordance with the requirements of the Public Records (Scotland) Act 2011.

Central Scotland Valuation Joint Board (CSVJB) takes its responsibilities for records management very seriously.

CSVJB appoints an Assessor who is an independent statutory official and who must be a Chartered Surveyor. The Assessors is responsible for the compilation and maintenance of the Valuation Roll for non-domestic rating and the Valuation List for Council Tax. The Assessor has also been appointed by the three constituent councils as Electoral Registration Officer and is personally responsible for the compilation and maintenance of the Register of Electors.

The Assessor and Electoral Registration Officer and his 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 produce and maintain the Valuation List which sets out the banding of all dwellings for Council Tax.

3. To prepare and maintain the Register of Electors.

In order to assist us in meeting our three statutory functions we receive support services from Clackmannanshire Council - services such as Human Resources, Legal, and Finance. In the course of receiving these support services.

We are a small organisation in terms of staff numbers, resources and budget but nevertheless have an impact on all residents of the Central Scotland Valuation area as well as most, if not all, businesses based in the area.

In common with all Public Sector organisations we are aiming to show continual improvement with limited resources. As a consequence all areas of our service provision are under constant scrutiny and review where difficult decisions have to be made in an effort to meet stakeholder expectations with less resources.

Notwithstanding the above, we have begun a process of modernisation and transformational change. Part of this process involves proposals for a restructure of our network files and the introduction of an Electronic Document Management System (SharePoint) which will facilitating a move away from records being stored on Shared and Personal Drives to a more open and accessible form. In addition we are at the initial planning stage of a paper records scanning project whereby we are identifying vital records for scanning and electronic storage. We are therefore in the midst of a period of modernisation and transformational change and consideration of this Plan should be viewed in this context.

I can confirm that it is the stated aim of Central Scotland Valuation Joint Board and the Assessor & ERO to achieve efficiency benefits through best practice applied to records management. This is intended to lead to improvements in the use of all Board resources.

Best Practice in records management will ensure that all information:

- Received or created is stored in the appropriate way and is easily retrievable
- Is retained, destroyed or preserved in accordance with the Board's Retention and Disposal Arrangements
- Meets our current needs and our requirements into the foreseeable future
- Is capable of enabling change when required
- Is easily accessible to users and that the skills and technology are available to achieve this aim

The Public Records (Scotland) Act 2011 emphasises the importance placed on records management in local authorities. This plan has been drafted in order to meet the requirements of the Act. It will be reviewed at regular intervals to ensure its effectiveness.

In preparing for the submission of this plan we have commenced a review of our existing records management Policies and Procedures. It is intended to continue with a review of all relevant policies over the next 12 months. We recognise that we have room for improvement and are therefore committed to continuing this process of change and improvement. Preparation of this plan has helped us to identify areas where actions can be taken to ensure improvement of our recordkeeping and information governance processes.

I commend this plan to the Keeper of the Records of Scotland

Pete Wildman
Assessor and Electoral Registration Officer

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1.   Introduction

The Public Records (Scotland) Act 2011 ('the Act') came fully into force in January 2013. The Act requires Central Scotland Valuation Joint Board (CSVJB) and other public authorities to prepare and implement a Records Management Plan (RMP). The RMP sets out proper arrangements for the management of records within the Board. The plan is to be agreed with the Keeper of the Records of Scotland ('the Keeper') and reviewed by CSVJB on an annual basis.

A copy of the Act can be viewed online at:

www.legislation.gov.uk/asp/2011/12/part/1/enacted

More information about the Public Records (Scotland) Act 2011 can be found by visiting the National Records of Scotland website at:

www.nas.gov.uk/recordKeeping/publicRecordsActIntroduction.asp

In line with the Act, all records created in the carrying out of the Board's functions (whether directly or by third parties) are public records. Part 1, section 3.1 of the Act states that:

. . ."public records", in relation to an authority, means—

(a)   records created by or on behalf of the authority in carrying out its functions,

(b)   records created by or on behalf of a contractor in carrying out the authority's functions,

(c)   records created by any other person that have come into the possession of the authority or a contractor in carrying out the authority's functions."

Establishing effective records management arrangements helps to deliver a number of business benefits. For example:

- efficient and systematic control of the creation, storage, retrieval, maintenance, use and disposal of records

- faster, more accurate and reliable access to records

- compliance with legislative and regulatory requirements

2.   Records Management Plan

CSVJB's RMP relates to records throughout their lifecycle, from creation and acquisition to archive and destruction. It encompasses all records across all our service areas.

CSVJB's RMP sets out the overarching framework based on the 14 elements of the Keeper's published Model RMP.

The 14 Elements are:

1.   **Senior Management Responsibility**

2.   **Records Manager Responsibility**

3.   **Records Management Policy Statement**

4.   **Business Classification**

5.   **Retention Schedules**

6.   **Destruction Arrangements**

7.   **Archiving and Transfer Arrangements**

8.   **Information Security**

9.   **Data Protection**

10.   **Business continuity and vital records**

11.   **Audit trail**

12.   **Competency Framework for Records Management Staff**

13.   **Assessment and Review**

14.   **Shared Information**

CSVJB has provided the Keeper with evidence of policies, procedures, guidance and operational activity on all elements of the RMP.

The RMP is effective from 31st March 2017. It will be reviewed and updated, if required, on an annual basis thereafter.

3. Elements of the Plan

Element 1: Senior Management Responsibility

Introduction	*Senior management responsibility is the single most important piece of evidence to be submitted as part of CSVJB's Records Management Plan. It identifies a person at senior level who has overall strategic responsibility for records management.* *This is a mandatory element of the Public Records (Scotland) Act 2011.*
Statement of Compliance	The Senior Responsible Officer for Records Management within Central Scotland Valuation Joint Board is; Pete Wildman Assessor & Electoral Registration Officer Central Scotland Valuation Joint Board Hillside House Laurelhill Business Park Stirling FK7 9JQ
Evidence of Compliance	• Item 001: Statement from Assessor & Electoral Registration Officer • Item 002: CSVJB Records Management Policy
Future Developments	There are no planned future developments in respect of Element 1. However, if the Senior Responsible Officer for records management changes our policies and procedures will be updated accordingly, in addition NRS will be advised.
Assessment and Review	This element will be reviewed if, and when, there are any changes in personnel.
Responsible Officer(s)	Pete Wildman, Assessor & Electoral Registration Officer

Element 2: Operational Records Management Responsibility

Introduction	*Records manager responsibility must identify the individual within the organisation, answerable to senior management, to have operational responsibility for records management within the organisation.* *This is a mandatory element of the Public Records (Scotland) 2011.*
Statement of Compliance	The Responsible Officer for Records Management within Central Scotland Valuation Joint Board Jane Wandless Assistant Assessor Central Scotland Valuation Joint Board Hillside House Laurelhill Business Park Stirling FK7 9JQ
Evidence of Compliance	• Item 001: Statement from Assessor & ERO • Item 002: Records Management Policy • Item 003: Job Profile of Assistant Assessor – Named Records Manager
Future Developments	There are no planned future developments in respect of Element 2. However, if the Responsible Officer for records management changes our policies and procedures will be updated accordingly, in addition NRS will be advised.
Assessment and Review	This element will be reviewed if, and when, there are any changes in personnel.
Responsible Officer(s)	Jane Wandless, Assistant Assessor

Element 3: Records Management Policy Statement

Introduction	*Records management policy statement must demonstrate the importance of managing records within the organisation and serve as a mandate for the activities of the Records manager. It is necessary in order to provide an overarching statement of the organisations priorities and intentions in relation to recordkeeping and deliver a supporting framework and mandate for the development and implementation of a RM culture.* *This is a mandatory element of the Public Records (Scotland) Act 2011.*
Statement of Compliance	A new Records Management Policy has been introduced to take into account the requirements of Public Records (Scotland) Act 2011. It is available on the Board's intranet site and is publicly available on the Board's website. CSVJB's commitment to establishing and maintaining effective records management is set out in the Records Management Policy and has been confirmed and emphasised in the Assessor and Electoral Registration Officer's covering statement at the beginning of this Plan. CSVJB also recognises the legal obligations to set out proper records management arrangements to ensure compliance with other legislation such as the Freedom of Information (Scotland) Act 2002, Data Protection Act 1998 and Local Government (Scotland) Act 1994. The records of CSVJB constitute an auditable account of the authority's activities, which provides evidence of the business, actions, decisions and resulting policies formed by the Board. Records represent a vital asset, which support the daily functions of the Board and protect the interests and rights of staff, and members of the public, who have dealings with us.

	CSVJB uses three main types of records management systems: • Manual Filing Systems (where it is necessary to keep paper and other physical records) • IT applications and databases that process records for specific functions (i.e. Valuation for the purposes of Non-Domestic Rating and Council Tax and associated systems and Electoral Registration) • Storage of electronic documents on an Intranet site, shared drives and personal drives All records management systems are subject to the records management policy, procedures, guidelines and other elements of the RMP. No statutory function of the Board is currently undertaken by a Third Party Metadata determining an audit trail is created for all electronic records and are readily accessible or by liaison with the IT team which carries out regular checks.
Evidence of Compliance	• Item 001: Statement from Assessor and Electoral Registration Officer • Item 002: Records Management Policy • Item 004: Document Retention Policy • Item 005: Acceptable Use Policy Item 041: Screenshot of Records Management Policy on CSVJB's Intranet site.
Future Developments	There are no planned future developments with respect to Element 3. However all Board Policies and Procedures (including those relating to Records Management) are under regular review in an effort to ensure that they reflect the Board's position in relation to recordkeeping.
Assessment and Review	This element will continue to be reviewed on a regular basis at Management Team Meetings
Responsible Officer(s)	Jane Wandless, Assistant Assessor

Element 4: Business Classification

Introduction	*The Keeper expects an organisation to carry out a comprehensive assessment of its core business functions and activities, and represent these within a business classification scheme (BCS). It is expected that Element 4 should confirm that the organisation has developed or is in the process of developing a BCS.*
Statement of Compliance	CSVJB has maintained a Records Retention and Disposal Arrangements schedule in accordance with the Freedom of Information (Scotland) Act 2002. This details the function; activities and transactions and forms the basis of our Business Classification Scheme. The classification scheme is a functional model which groups related business activities and transactions which are part of the overall functions of the Board. The business classification scheme is structured in three tiers: Level 1: functions Level 2: activities Level 3: transactions The functions, activities and transactions are detailed in the Business Classification Scheme and should be read in conjunction with the Document Retention and Disposal Schedule. It is hoped that this Business Classification Scheme will assist in the future introduction of an Electronic Document Management System.

Evidence of Compliance	- Item 006 - Business Classification Scheme - Item 007 - Document Retention & Disposal Schedule - Item 030A - Project Plan – Implementation of CSVJB network file restructure and implementation of SharePoint - Updated March 2018.Item 043 - Screenshot SharePoint home page - Item 044 - Screenshot SharePoint Electoral site (1) - Item 045 – Screenshot SharePoint Electoral (2)
Future Developments	The roll out the Business Classification Scheme (BCS) will require a careful and considered approach. It is anticipated that the implementation of the BCS will take place over a period of approximately two years with all records classified according to the five core functions within the BCS over this period. he introduction of an Electronic Document Management System (SharePoint) is currently in progress with end user training due for completion in March 2018. Migration of documents to the new structure is in progress.The BCS will provide a structure which will assist with the implementation of SharePoint.
Assessment and Review	Records Management, the Document Retention and Disposal Schedule and all Policies and Procedures are a standing item on the Management Team Agenda. When the migration of electronic documents to SharePoint is concluded the Business Classification Scheme will be reviewed as required.
Responsible Officer(s)	Jane Wandless, Assistant Assessor

Element 5: Retention Schedules

Introduction	*A retention schedule is a list of records for which pre-determined disposal dates have been established. Retention Schedules must demonstrate the existence of and adherence to corporate records retention procedures. These procedures must show that the organisation routinely disposes of information, whether this is destruction or transfer to an archive for permanent preservation.*
Statement of Compliance	Our Records Management Policy and associated Procedures outline the need to detail the retention periods and subsequent disposition actions for all types of record through a retention schedule. The Document Retention and Disposal Schedule is an essential part of our overall Records Management Plan, ensuring that records are kept for no longer than is absolutely necessary and disposed of as appropriate.
	A Document Retention and Disposal Schedule was developed in accordance with the Freedom of Information (Scotland) Act 2002 and forms a pre-existing structure for managing records within CSVJB.
	The purpose of a Document Retention and Disposal Schedule is to provide consistent instructions on records retention and disposal for all staff who deal with records. The Schedule will underpin our Records Management activities.
	The Records Retention and Disposal Schedule will help to establish the types of records we need to keep, how long records are required and what should be done with them at the end of that period.
	The Retention and Disposal Schedule is intended to cover all records, regardless of medium or format, which are created or received during the course of business.
	The Schedule will be formally reviewed on an annual basis.

Evidence of Compliance	- Item 002 - Records Management Policy - Item 004 - Document Retention and Disposal Policy - Item 007 - Document Retention and Disposal Schedule - Item 008 – Information Asset Disposal Policy - Item 029 – Document & Data Handling Policy
Future Developments	The Documents Retention and Disposal Schedule will continue to be applied to all CSVJB records. In particular, as we progress with our restructure of network files and the introduction of our electronic document management system the Schedule will be enforced even more rigorously.
Assessment and Review	The Schedule will be formally reviewed on an annual basis.
Responsible Officer(s)	Jane Wandless, Assistant Assessor

Element 6: Destruction Arrangements

Introduction	*Destruction arrangements should provide evidence of the arrangements that are in place for the secure destruction of confidential information. Clear destruction arrangements detailing the correct procedures to follow when destroying business information are necessary in order to minimise the risk of an information security incident and ensure that the organisation meets its obligations in relation to the effective management of its records, throughout their lifecycle.* *This is a mandatory element of the Public Records (Scotland) Act 2011.*
Statement of Compliance	Guidance has been produced on destruction arrangements for CSVJB records which have reached the end of their retention period and have been identified as suitable for destruction in accordance with the Document Retention and Disposal Schedule. The destruction arrangements have been developed in line with CSVJB's various Records Management Policies and Procedures. Unless there are any special instructions or unique circumstances, records generally will be destroyed at the end of their retention period. Retaining any record past the mandatory retention period should be on an exception-only basis, weighing a record's potential usefulness against cost and any space limitations. In respect of confidential paper waste, Paper Shredding Services Limited provides our offices with an on-site shredding facility. Confidential paper waste is held in secure locations within the office, within sacks provided by Paper Shredding Services for on-site shredding when Paper Shredding Services Limited next attends at each location. All paper and digital media and IT equipment is disposed of in accordance with the Information Asset Disposal Policy. In the case of backup tapes; USB drives; hard-disks; DVDs and CDs the media shall be physically destroyed. External contractors are used for secure media disposal on a regular basis on renewal of such equipment and the following procedures are to be adopted: • A certificate shall be returned by the contractor containing precise details of the

media destroyed and the method by which the media were destroyed. If the media are to be destroyed off CSVJB premises, an appropriately secure form of transport must be used. The determination of the appropriateness of the form of transport shall include consideration of the following:

- Security of the vehicle used whilst making subsequent collections from other organisations prior to reaching the place of destruction.

In an effort to meet its obligations under the 2011 Act, CSVJB plans to introduce a Disposals Register. A high level summary of all records disposed of will be recorded in the Disposals Register.

CSVJB does not currently engage a third party contractor for the off-site storage of paper records. Were CSVJB to engage a third party for the storage of paper records it is recognised that there would be a requirement to ensure that records are securely destroyed in accordance with retention schedules.

Evidence of Compliance	- Item 002 - Records Management Policy - Item 008 - Information Asset Disposal Policy - Item 008A – CSVJB Backup process (Confidential) - Item 005 - Acceptable Use Policy - Item 009 – Confidentiality Agreement – Paper Shredding Services - Item 010 - Certificate of Secure Destruction & Recycling from Paper Shredding Services Ltd - Item 010A – Sample Certificate of destruction for hardwear.
Future Developments	Introduction of Disposal Register. Appropriate Company Certificates and Registrations from our external disposal contractors will be obtained.
Assessment and Review	The application and benefits derived from the introduction of a Disposals Register will be monitored and reviewed in March 2018.

Responsible Officer(s)	Jane Wandless, Assistant Assessor

Element 7: Archiving and Transfer Arrangements

Introduction	*Archiving and transfer arrangements should detail the processes in place within an organisation to ensure that records of long term historical value are identified and deposited with an appropriate archive repository. Arrangements for the transfer of material of enduring value to an archive should be clearly defined and made available to all staff in order to ensure that the records are transferred at their earliest opportunity and the corporate memory of the organisation is fully and accurately preserved.* *This is a mandatory element of the Public Records (Scotland) Act 2011*
Statement of Compliance	The Electoral Register, Valuation Roll and Valuation List are provided annually in electronic format to the 3 member councils, in Stirling, Falkirk and Clackmannanshire. The Assessor & ERO also provides copies of Valuation Rolls, Council Tax Lists and Electoral Registers to the National Library and National Records of Scotland. CSVJB does not currently archive materials with any other third party Whilst CSVJB does not currently have a formal written agreements in place for the transfer of records with Falkirk Council, Falkirk Council currently publish Board papers including Board minutes on their website falkirk.gov.uk. We will therefore aim to put in place a memorandum of agreement between ourselves and Falkirk Council Archives for the archiving of records such as records relating to Board meetings and minutes of Management Team Meetings. Should the need arise in the future for the archiving of records of long-term or historic worth it is intended that archiving arrangements are undertaken in line with the Records Management Policy, Document Retention and Disposal Schedule and associated Procedures.
Evidence of Compliance	• Item 004 - Document Retention and Disposal Policy • Item 007 - Document Retention and Disposal Schedule • Item 002 - Records Management Policy • Item 008 - Information Asset Disposal Policy

Future Developments	At present we have no formal written agreement with Stirling, Falkirk or Clackmannanshire Council Archives for the transfer of records. In the event that items of long term or historic merit are identified e.g. in the process of the file scanning project we will consider putting in place a memorandum of agreement between ourselves and these Council Archives. We will aim to put in place a memorandum of agreement between ourselves and Falkirk Council Archives for the archiving of records such as records relating to Board meetings and minutes of Management Team Meetings.
Assessment and Review	The need for a memorandum of agreement between ourselves and the relevant Council Archives will be considered as part of the File Scanning Project
Responsible Officer(s)	Jane Wandless, Assistant Assessor

Element 8: Information Security

Information security is the process by which an authority protects its records and ensures they remain available It also maintains privacy where appropriate and provides for the integrity of the records.

Introduction	*Information security makes provisions for the proper level of security of its records. It is the process by which an authority protects its records and ensures they remain available. It also maintains privacy where appropriate and provides for the integrity of the records. Information security is essential in order to protect an organisation's information and information systems from unauthorised access, use, disclosure, disruption, modification or destruction.* *This is a mandatory element of the Public Records (Scotland) Act 2011.*
Statement of Compliance	CSVJB Information Technology Security Policies summarises the security framework in place for records which fulfils the security commitments outlined in our Records Management Policy. Securing information assets, and in particular records, will help to fulfil legislative responsibilities, safeguard CSVJB's reputation, ensure business continuity, optimise the management of risk and minimise the impact of security incidents. As a key information asset, the security of all records will be managed in accordance with the CSVJB's existing approved Information Technology Security Policies and Procedures. Every individual with access to records is responsible for ensuring their protection. All staff receive information security awareness training and are reminded of the importance of security at intervals. Additionally all staff have been vetted to a basic level by Disclosure Scotland. A clear desk policy is in place throughout the office which requires staff to clear their desks of paper documents at the end of each day and to store confidential information securely overnight. CSVJB has a central Risk Register in place, for individual

	projects a bespoke risk register is set up for each project e.g. elections. The main Risk Register is reviewed on a regular basis at Management Team meeting. In addition our Risk Strategy document and significant risks in the main Risk Register are reported at our Board Meetings on an annual basis. Careful monitoring and reporting of our Risk Registers should enhance information security and allow senior managers to adequately plan and provide sufficient information governance procedures. All staff have access to our Data Protection, Freedom Of information Policies and Procedures, Acceptable Use Policy and other associated policies and procedures.
Evidence of Compliance	• Item 005 - Acceptable Use Policy • Item 011 - Data Protection Policy • Item 012 - Freedom of Information Policy • Item 002 - Records Management Policy • Item 013 - Risk Register - Scottish Local Government Elections • Item 014 - Risk Register – Combined Risk • Item 039 - Risk Assessment Report to CSVJB June 2016 • Item 040 - Risk Strategy • Item 015 - Clear Desk & Screen Practice Note • Item 016 - Information Handling Policy • Item 017 - Access Control Policy • Item 018 - Building Security Procedures • Item 019 - Security Incident Reporting • Item 020 - IT System Change Control • Item 021 - Mobile Device Protocol • Item 022 - Electronic Communication Policy • Item 023 - Social Networking Policy • Item 024 - User Account Management • Item 025 - Vulnerability Management Policy • Item 026 - Domain Password Policy • Item 029 - Document & Data Handling Policy • Item 046 - Screenshot showing Security Menu on intranet • Item 047 – Screenshot showing Information Handling Policy on intranet
Future Developments	A review of existing Data Protection Policy and guidance to be undertaken, with particular regard to introduction of General Data Protection Regulations from May 2018.
Assessment and Review	All Policies, Procedures and the Risk Registers will be reviewed on a regular basis at Management Team Meetings and presented where appropriate to our Board for comment

	and approval.
Responsible Officer(s)	Jane Wandless, Assistant Assessor

Element 9: Data Protection

Introduction	*The Keeper expects an organisation to provide evidence of compliance with data protection responsibilities for the management of personal data. An authority that handles personal information about individuals has a number of legal obligations to protect that information under the Data Protection Act 1998.*
Statement of Compliance	CSVJB and the Assessor and ERO rely on the information that they collects and holds to fulfil their aims, objectives, and obligations with reference to "performing their public functions". Information relating directly to individuals (personal data) is an essential asset which must be properly managed in order to deliver efficient and effective services, ensure legal compliance, and to protect the Board's and Assessor and ERO's reputation and image as a responsible organisation.
	The Data Protection Act 1998 places obligations on organisations that use personal information and gives individuals certain rights. The Act states that those who record and use personal information must be open about how the information is used.
	CSVJB and the Assessor and ERO fully endorse and adhere to the Principles of Data Protection as detailed in the Act and have an approved Data Protection Policy in place to ensure that all personal data processing, carried out on their behalf (either in-house, by contractors, by system suppliers or partner organisations) complies with data protection principles and key legislative requirements.
	As a Data Controllers, CSVJB and the Assessor & ERO is registered as such with the Information Commissioner's Office (ICO). The Board's Registration can be viewed on the ICO website, www.ico.org.uk . The Registration number is: **Z7353775**
Evidence of Compliance	- Item 011 - Data Protection Policy - Item 027 - Extract from UK ICO website confirming CSVJB, Assessor and Electoral Registration Officers Registration.
Future Developments	Further and regular training will be provided to all staff in order to ensure that they are aware of their responsibilities in managing, processing and protecting personal data.

Assessment and Review	A review of the existing Data Protection Policy and guidance to be undertaken, with particular regard to introduction of General Data Protection Regulations from May 2018.
Responsible Officer(s)	Jane Wandless, Assistant Assessor

Element 10: Business Continuity and Vital Records

Introduction	*A Business Continuity and Vital Records Plan ensures that key records and systems are protected and made available as soon as possible in the event of, and following, an emergency. The plan should identify the measures in place to prepare for, respond to and recover from such an emergency.*
Statement of Compliance	A Business Continuity Plan (BCP) is in place in the event of any disaster. A copy of The Business Continuity Plan is available on the Intranet. The Business Continuity Plan is reviewed on a regular basis at Management Team Meetings together with our Document Retention and Disposal Schedule and our Risk Register. All of these documents are essential to the continuation of the service should there be a disaster. Once reviewed suitable arrangements will be put in place to ensure access to such records in an emergency. The Business Continuity Plan was reviewed and amended in October 2017 and a successful Disaster Recovery Test Day was carried out in December 2017. An IT Disaster Recovery Plan (DRP) is currently in place for electronic records and the electoral registration service. Additionally it is our aim to introduce an Electronic Document Management System which will assist in the retention of essential property records in a digital format. The proposed file scanning project will also ensure that vital paper records are preserved in digital format in the event of any disaster.

Evidence of Compliance	• Item 028 - Business Continuity Plan • Item 028A – Screenshot showing Business Continuity Plan on intranet • Item 028B – Business Continuity Plan (revised 10/2017) • Item 028C - Disaster Recovery Test Day Dec.2017 • Item 028D - Appendix D IT DR Procedure • Item 013 - Risk Register - Scottish Local Government Elections • Item 014 - Risk Register – Combined Risk Analysis • Item 039 - Risk Assessment Report to CSVJB June 2016 • Item 040 - Risk Strategy • Item 004 - Document Retention and Disposal Policy Item 007 - Document Retention and Disposal Schedule
Future Developments	Continue with the review of our Risk Register, Business Continuity Plan and Policies & Procedures. Possible future developments will be dependent on the introduction of a new Electronic Document Management System and the file scanning project.
Assessment and Review	Business Continuity Plan to be regularly reviewed by the Business Continuity Working Group.
Responsible Officer(s)	Jane Wandless, Assistant Assessor.

Element 11: Audit Trail

Introduction	*An audit trail is a sequence of steps documenting the movement and/or editing of a record resulting from activities by individuals, systems or other entities.*
Statement of Compliance	At present, electronic systems within CSVJB are able to provide audit trails for electronic records. Audit facilities are available in both Best Value CSVJB's core system (Council Tax and Non-domestic Rating records) and EROS (Electoral Management System). For network drives we use a Netwrix audit facility. Personal C drives have been disabled ensuring that all electronic records are currently auditable.

Our Business Classification Scheme will assist in developing a standard and consistent file naming convention and version control procedure. We are also currently in the process of a restructure of our electronic files which will include an audit of all network drives. In addition we are in the process of introducing an electronic document management system which will assist with this process.

Audit trails for paper records are less obvious. The Assessor currently has circa 12,000 paper files for non-domestic properties and 138,000 paper files for domestic properties. Whilst we are progressively moving towards the more frequent use of information held in an electronic format we are nevertheless still very reliant on paper records.

We are therefore currently in the process of scanning our 138,000 domestic property files with the scanning of all paper rent and return of information forms now completed. The scanning of all domestic and non-domestic property files is currently scheduled to be completed by March 2020.This will ensure that many of our essential paper records are scanned and held in electronic format. This together with the introduction of an electronic document management system (SharePoint) will assist in our aim to move as much as possible towards a paperless office. Consideration is being given in the interim to the introduction of a simple logging out sheet for our paper files.

A working group has been set up to implement and manage the restructure of our electronic file records and consider the introduction of a document management system. This Working Group will also consider the development of a SharePoint site. A project plan is attached for information. |

Evidence of Compliance	- Item 006 - Business Classification Scheme - Item 030 - Project Plan – Implementation of CSVJB network file restructure and implementation of SharePoint. - Item 030A – Project Plan – Implementation of CSVJB network file restructure and implementation of SharePoint (March 2018 update) - Item 049 - Screenshots Netwrix Auditor - Network Drives - Item 050 - Screenshot of Best Value (Core system) Audit trail - Item 051 - Screenshot Audit documents EROS - A History of Documents Sent to Electors Properties - Item 052 - Screenshot Audit documents EROS - Database Changes Audit Trail - Item 053 - Scanning Project Gant Chart – March 2018
Future Developments	We are in the process of introducing an Electronic Document Management System. We are committed to a restructure of our electronic file records and introduction of an intranet/SharePoint site. The need for a method of logging the removal of paper files is recognised and will be investigated further.
Assessment and Review	The restructure of our network files and the introduction of a SharePoint site is crucial to the modernisation process and will therefore be monitored closely. A method of logging the removal of our paper files will be considered by the Management Team.
Responsible Officer(s)	Jane Wandless, Assistant Assessor

Element 12: Competency Framework for Records Management Staff

Introduction	*Core competencies and key knowledge and skills required by staff with responsibilities for records management should be clearly defined and made available within organisations so as to ensure that staff understand their roles and responsibilities, can offer expert advice and guidance, and can remain proactive in their management of recordkeeping issues and procedures.*
Statement of Compliance	Currently there is no approved framework in place which details competencies required by staff with responsibility for the records management function to effectively support business, meet corporate goals, implement best practice, ensure the organisation is accountable and comply with legislation, particularly requirements of the Public Records (Scotland) Act 2011. However CSVJB and the Assessor & ERO is committed to providing training to staff engaged in records management duties. CSVJB is a very small organisation with limited resources, nevertheless, where cost effective training can be sourced it will be offered to those actively engaged in records management
	All staff have access to Clackmannanshire Council's online training packages of which Information Security Awareness Is just one valuable resource. Other modules undertaken by all new staff as part of their induction process include Data Protection and Freedom of Information. All staff are also required to complete the Civil Service Learning Module – Protecting Information: level 1. All Line Managers and Senior Managers have undertaken PDP Data Protection Training modules with the Assistant Assessor completing the required modules for the Practitioners Certificate in Data Protection examinations in June 2017.
	Training on the Public Records (Scotland) Act 2011 will be rolled out to all staff over the next 12 months by the Assistant Assessor. In addition an employee guide to Records management will be included in staff induction packs. Line Managers have recently been given access to Falkirk Council's online training module which includes Records Management training.
	The Assistant Assessor has undertaken several pieces of training in the lead up to preparing this plan, including the following ;
	• Attendance at a PR(S)A Surgery, organised by NRS at Argyll and Bute Council, Helensburgh, 14th May, 2014

	- Attendance at NRS E-records seminar, New Register House, Edinburgh, 1st December, 2015. - Attendance at Launch of PRSA Progress Assessment mechanism in Edinburgh, 14th December 2016 - Records Management training on Falkirk Council online training module. - PDP Data Protection training 14th to 17th March, 2017. (To undertake examination – Practitioners Certificate in Data Protection in June 2018) The Assistant Assessor is a professional Chartered Surveyor and as a member of the Royal Institution of Chartered Surveyors is well used to undertaking training in order to maintain a certain level of competency. In order to maintain his membership of the RICS he is required to undertake a minimum of 20 hours Continual Professional Development per annum. Training and the expansion of his knowledge and competency in the field of records management is not anticipated to be a problem in the future. As Freedom of Information Officer and Records Manger, the Assistant Assessor also has the benefit of constantly expanding her knowledge and competency in these inter-related fields.
Evidence of Compliance	- Item 002 - Records Management Policy - Item 031 - Screen Shot of Falkirk Council online training facility - Item 032 - Sample Certificate – Protecting Information: level 1 - Item 038 - Records Management Guide for Employees
Future Developments	The Assistant Assessor will deliver training on the Public Records (Scotland) Act 2011, to all staff. The Assistant Assessor will ensure that the new Records Management Guide for Employees is included in all Staff Induction Packs.
Assessment and Review	This element will be regularly reviewed and reported to the Management Team Meeting.
Responsible Officer(s)	Jane Wandless, Assistant Assessor.

Element 13: Assessment and Review

Introduction	*Records Management practices in place within an organisation must remain fit for purpose. Procedures should be closely monitored, assessed and reviewed with a view to ensuring ongoing compliance and commitment to best practice recordkeeping. Regular assessment and review of records management systems will give an authority a clear statement of the extent that its records management practices conform to the Records Management Plan as submitted and agreed by the Keeper.*
Statement of Compliance	The Records Management Plan, Records Management Policy and the Document Retention and Disposal Schedule will be subject to the Board's governance, monitoring and review process. The RMP will, if approved, be reported to the Board and will thereafter be reviewed on an annual basis by the Management Team. The Management Team have Records Management as a standing item on the Agendas for their 6 weekly meetings. The Management Teams role will include: Developing and implementing policies and procedures relating to the plan and monitoring/reporting progress. Reviewing and implementing policies, procedures and standards. Monitoring projects relating to this plan. Scrutiny and review of the plan and supporting strategies, policies and progress, led by the Assistant Assessor. Approve of the plan and associated strategies and policies. At present arrangements are in place to monitor, self-audit and report on performance on an ongoing basis the continued development and improvement of records management practice through the Management Team.
Evidence of Compliance	
Future Developments	Consideration will be given to forming an Information Governance Working group to report to the Management team on Records Management and Data Protection matters.

Assessment and Review	This element will be regularly reviewed and reported to the Management Team Meeting.
Responsible Officer(s)	Jane Wandless, Assistant Assessor

Element 14: Shared Information

Introduction	*Procedures for the efficient sharing of information both within an organisation and with external partners are essential for ensuring information security and recordkeeping compliance. Protocols should include guidance as to what information can be shared, who should retain the data, what levels of security are to be applied, who should have access, and what the disposal arrangements are.*
Statement of Compliance	In limited circumstances, CSVJB and Assessor & ERO information is shared with third parties. CSVJB will also receive confidential information from partner organisations. In each case appropriate agreements are entered into to ensure confidentiality of the information.
Evidence of Compliance	- Item 016 - Information Handling Policy - Item 005 - Acceptable Use Policy - Item 011 - Data Protection Policy - Item 002 - Records Management Policy - Item 013 - Risk Register - Scottish Local Government Elections - Item 014 - Risk Register – Combined Risk Analysis - Item 039 - Risk Assessment Report to CSVJB June 2016 - Item 040 - Risk Strategy - Item 019 - Security Incident Reporting - Item 017 - Access Control Policy - Item 021 - Mobile Device Protocol - Item 022 - Electronic Communication Policy - Item 023 - Social Networking Policy - Item 024 - User Account Management - Item 033 - Data Processing Agreement between CSVJB and Clackmannanshire Council (Staff personal information) - Item 034 - Data Sharing Agreement between ERO and Stirling Council (Education records) - Item 035 - Data Sharing Agreement between ERO and Falkirk Council (Education records) - Item 036 - Data Sharing Agreement between ERO and Clackmannanshire Council (Education records) - Item 037 - Data Sharing Agreement between ERO and University of Stirling

Future Developments	CSVJB will review all existing Information Sharing Protocols with a view to ensuring that they are relevant and fit for purpose.
Assessment and Review	As and when new Information Sharing Protocols are entered into they will be reviewed in accordance with Element 14.
Responsible Officer(s)	Jane Wandless, Assistant Assessor

4. <u>List of Supporting Evidence</u>

EVIDENCE

Ref.	Details	Element(s)	Remarks
001	Statement of Responsibility from Assessor & ERO	1,2,3	
002	Records Management Policy	1,2,3,5,6,7,8,12,14	
003	Job Profile of Assistant Assessor – Named Records Manager	2	
004	Document Retention Policy	3,5,7,10	
005	Acceptable Use Policy	3,6,8,14	
006	Business Classification Scheme	4,11	
007	Document Retention and Disposal Schedule	4,5,7,10	
008	Information Asset Disposal Policy	5,6,7	
008A	CSVJB Backup process (Confidential)	6	
009	Confidentiality Agreement – Paper Shredding Services	6	
010	Certificate from Paper Shredding Services Ltd	6	
010A	Sample Destruction Certificate Hardwear	6	
011	Data Protection Policy	8,9,14	
012	Freedom of Information Policy	8	
013	Risk Register - Scottish Local Government Elections 2017	8,10,14	
014	Risk Register – Combined Risk Analysis 2017 (latest)	8,10,14	
015	Clear Desk & Screen Practice Note	8	
016	Information Handling Policy	8,14,	
017	Access Control Policy	8,14,	
018	Building Security Procedures	8	
019	Security Incident Reporting and Management	8,14	
020	IT System Change Control	8,14	
021	Mobile Device Protocol	8,14	
022	Electronic Communication Policy	8,14	
023	Social Networking Policy	8,14	
024	User Account Management	8,14	
025	Vulnerability Management	8	
026	Domain Password Policy	8	
027	Extract from UK ICO Website confirming CSVJB, Assessor and Electoral Registration Officers Registration	9	
028	Business Continuity Plan (As at March 2017)	10	
028A	Screenshot showing Business Continuity Plan on Intranet	10	
028B	Business Continuity Plan (As revised Oct. 2017)	10	
028C	Disaster Recovery Test Day Dec 2017	10	
028D	Appendix D IT DR Procedure	10	
029	Document & Data Handling Policy	5,8	

030	Project Plan – Network File restructure and SharePoint Implementation	11	

031	Screenshot Falkirk Council online training facility – Records Management	12	
032	Sample Certificate – Civil Service Protecting Information level 1	12	
033	Data Processing Agreement – CSVJB & Clackmannanshire Council (Staff Personal information)	14	
034	Data Sharing Agreement - ERO & Stirling Council (education records)	14	
035	Data Sharing Agreement - ERO & Falkirk Council (education records)	14	
036	Data Sharing Agreement - ERO & Clackmannanshire Council (education records)	14	
037	Data Sharing Agreement – ERO & University of Stirling (student information)	14	
038	Records Management Guide for Employees	12	
039	Risk Assessment Report to CSVJB June 2016	8, 10,14	
040	Risk Strategy	8,10,14	

National Records of Scotland

Public Records (Scotland) Act 2011

Public Authority
Central Scotland Valuation Joint Board

The Keeper of the Records of Scotland

28 June 2018

Preserving the past | Recording the present | Informing the future

Assessment Report

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 fully 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. Executive Summary

This report sets out the findings of the Keeper's assessment of the RMP of Central Scotland Valuation Joint Board by the Public Records (Scotland) Act 2011 Assessment Team following its submission to the Keeper on 31 March 2017*.*

The assessment considered whether the RMP of Central Scotland Valuation Joint Board was developed with proper regard to the 14 elements of the Keeper's statutory Model Records Management Plan (the Model Plan) under section 8(3) of the Act, and whether in this respect it complies with it and the specific requirements of the Act.

The outcome of the assessment and the Keeper's decision on whether the RMP of Central Scotland Valuation Joint Board complies with the Act can be found under section 7 of this report with relevant recommendations.

3. 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.

4. Keeper's Assessment Process

The RMP was assessed by the Public Records (Scotland) Act Assessment Team on behalf of the Keeper. Assessors used the checklist elements listed in section 5, to establish whether [named public authority]'s RMP was developed with proper regard to the elements of the Model Plan and is compliant with the Act. The assessment also considered whether there was sufficient supporting evidence of such compliance.

Key:

G	The Keeper agrees this element of an authority's plan.		A	The Keeper agrees this element of an authority's plan as an 'improvement model'. This means that he is convinced of the authority's commitment to closing a gap in provision. He will request that he is 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 Keeper may choose to return the RMP on this basis.

5. Model Plan Elements: Checklist

Element	Present	Evidence	Notes
1. Senior Officer *Compulsory element*	G	G	The Records Management Plan (RMP) of Central Scotland Valuation Joint Board (hereafter known as CSVJB for ease of reference) identifies Pete Wildman, Assessor and Electoral Registration Officer, as having senior management responsibility for records management. This is confirmed in a statement from Mr Wildman (evidence 001) which expresses support for the Records Manager (see Element 2), and indeed, for all staff with responsibility for records management. Mr Wildman also states that he realises the benefits of best practice records management. The RMP itself also contains a covering statement which is signed by Mr Wildman. The appointment of Mr Wildman in this role is also confirmed in section 6.2 of CSVJB's Records Management Policy (evidence 002). The Keeper agrees that an appropriate individual has been identified to take strategic responsibility for records management as required by the Public Records (Scotland) Act 2011.
2. Records Manager *Compulsory element*	G	G	The RMP identifies Jane Wandless, Assistant Assessor, as having day-to-day operational responsibility for records management within CSVJB. This post of Records Manager is fully supported by the Assessor and Electoral Registration Officer (see Element 1). This is confirmed in a statement (evidence 001). Section 6.7 of the Records Management Policy (evidence 002) confirms the role of

			the Assistant Assessor, who is responsible for ensuring that all records management practices and procedures comply with relevant standards and statutory requirements. Ms Wandless is also responsible for providing relevant advice and guidance to line managers within CSVJB. Also submitted as evidence is Ms Wandless's Job Profile (evidence 003). This clearly shows that she acts as the Records Manager for CSVJB. The Keeper agrees that an appropriate individual has been identified to take day-to-day operational responsibility for records management as required by the Public Records (Scotland) Act 2011.
3. Policy *Compulsory element*	**G**	**G**	The RMP states that CSVJB has several methods of managing its records: Manual filing systems for paper and other physical records; Applications and systems that manage electronic records for specific purposes, such as Electoral Registration, Council Tax and Non-Domestic Rating; Shared drives, personal drives and intranet sites for corporate records. All of these records management systems are governed by the Records Management Policy, version 0.3, approved by the Board on 17 February 2017 (evidence 002) and other records management procedures and guidelines. The Policy highlights the importance of the effective management of CSVJB's records, irrespective of format, and allocates responsibilities for complying with the Policy. The Policy also evidences a commitment to providing all staff with training to raise awareness of responsibilities with regards to the Data Protection Act 1998, the Freedom of Information (Scotland) Act 2011 and the Public Records (Scotland) Act 2011. The Keeper commends this commitment to providing staff with relevant training.

			The RMP states that the Policy is available for staff to view on the CSVJB intranet and also the external website. CSVJB has submitted a screenshot of the relevant area of its intranet showing the location of the Policy and other information governance documents (evidence 041). Additionally, CSVJB has also provided the Keeper with a link to where the Policy sits on its website. The Keeper commends this approach of publishing key records management policies to its external website to provide information to its stakeholders. The Keeper agrees that CSVJB has an operational policy statement of its corporate approach towards records management.
4. Business Classification	**A**	**G**	CSVJB has developed a three level functional Business Classification Scheme (BCS) (evidence 006) to identify its functions and the records created in carrying these out. The BCS follows a functional model and details the functions of CSVJB, the activities required to carry out these functions and the transactions that create records. The Keeper currently considers the functional approach to be best practice due to its ability to withstand the changes in organisational structure. The BCS has been created to operate alongside the Document retention and Disposal Schedule (evidence 007). **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 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
			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.
5. Retention schedule	**G**	**G**	The Records Management Policy (evidence 002) contains a commitment to adhering to the requirements of the Document Retention and Disposal Schedule (evidence 007). The Schedule, which follows the structure of the BCS (see Element 4), describes the record types it creates, the disposal actions and timescale, how the records will be disposed of, and who is responsible for the destruction. The RMP states that the Schedule will be reviewed every year. The Schedule has been published on CSVJB's website. The Keeper commends the publication of key records management documents.
			CSVJB also operates a Document Retention and Disposal Policy (evidence 004) which governs the use of the Schedule. It also highlights the importance of recording the destruction of records and the need to check whether records are the subject of a Freedom of Information request prior to destruction. This Policy has also been published online.
			The 'Future Developments' section of this Element states that the Schedule is currently being used to dispose of records and will also be used to underpin the move from shared drives to the EDMS.

			The Keeper agrees that CSVJB has an operational retention schedule which describes the retention and disposal requirements of the records it creates.
6. Destruction Arrangements *Compulsory element*	**A**	**G**	Section 5.1 of the Records Management Policy (evidence 002) contains a commitment to review and consolidate destruction arrangements to detail the correct procedures for disposing of business information. The RMP details the following arrangements for the destruction of CSVJB records: **Paper records (on-site) –** The RMP states that confidential waste is stored in secure locations within the office until this is collected and securely shredded on-site by a commercial shredding contractor (Paper Shredding Services Ltd). Provided as evidence is a Confidentiality Agreement covering the records disposed of by the contractor (evidence 009) and also a sample Certificate of Destruction (evidence 010) showing that these arrangements are operational. **Paper records (off-site) –** CSVJB has provided a statement in the RMP to the effect that, at present, CSVJB does not engage a third party contractor to store records off-site. The Keeper accepts this statement. **Electronic records –** The application of CSVJB's Retention and Disposal Schedule (evidence 007) is governed by the Document Retention Policy (evidence 004) which applies to all records including electronic. Section 5 of the Policy outlines the criteria for decisions around the retention and disposal of records in line with the Schedule. The project to implement an EDMS would assist with the systematic destruction of electronic records. **Hardware –** The RMP states that all digital media and IT equipment such as USB drives, hard drives and DVDs are securely destroyed by a specialist contractor on a regular basis. This is done in accordance with the Information Asset Disposal Policy (evidence 008) which outlines the security requirements for contractors for hardware either being destroyed on-site or transported to the place of destruction. Both the

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<td>RMP and the Policy state that the contractor must supply a certificate of destruction detailing the quantities destroyed and the method of destruction. CSVJB has submitted a sample hardware destruction certificate (evidence 010A) as evidence that arrangements are in place.

<u>Back-ups –</u> The RMP states that back-up tapes are subject to destruction in the same way as hardware such as USB drives and hard drives. This is confirmed in Section 3.2.1 of the Information Asset Disposal Policy (evidence 008). CSVJB has provided evidence of its back-up arrangements. CSVJB regularly backs up its electronic information and systems for business continuity purposes. These are retained for an appropriate period.

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.

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 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.</td>
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<td>7. Archiving and Transfer
<i>Compulsory element</i></td>
<td>A</td>
<td>A</td>
<td>The RMP states that the records which CSVJB are statutorily obliged to create (Electoral Register, Valuation Rolls and Council Tax Lists) are sent electronically to the three constituent local authorities, namely Stirling, Falkirk and Clackmannanshire Councils, on an annual basis. Copies of these records are also sent to the National Library of Scotland and the National Records of Scotland. The RMP states that at present CSVJB does not archive records with any other party.</td>
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			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 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. 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.
8. Information Security *Compulsory*	**G**	**G**	The RMP states that there are a number of policies in place to protect CSVJB's information and systems. This is in line with the commitment in the Records Management Policy (evidence 002) to prevent unauthorised access, disclosure or

element			modification of CSVJB records and information. CSVJB operates an Acceptable Use Policy (evidence 005) for the use of software and hardware. All staff are required to read the Policy and sign the declaration at the end. The Information Handling Policy (evidence 016) defines how CSVJB's should be handled, including the secure disposal of information and the clear desk and screen policy that is in operation. The Access Control Policy (evidence 017) governs access to data held on CSVJB's production systems. The Building Security Procedures (evidence 018) describe the procedures in place to restrict physical access to CSVJB offices. The Domain Password Policy (evidence 026) outlines staff's requirements regarding the creation and maintenance of secure passwords to prevent unauthorised access to systems. The Mobile Device Policy (evidence 021) governs the use of mobile devices such as phones and storage devices. Also provided in CSVJB's Security Incident Reporting and Management Procedure (evidence 019) which describes the processes in place for reporting and responding to a security incident. CSVJB also has procedures in place to manage the risk of potential interruptions to its business. Provided as evidence are risk registers for Local Government Elections in 2017 and a combined organisation-wide Risk Analysis (evidence 013 and 014).

			These tie in to the overall Risk Management Strategy (evidence 040). Regular reports are provided to the Board meeting relating to organisational risk and a sample report has been supplied (evidence 039). The RMP states that all staff receive training in information security training by completing the Civil Service Learning Module Protecting Information – Level 1. A sample completion certificate has been submitted (evidence 032). All staff have also been vetted at Basic Level by Disclosure Scotland. The RMP also states that all staff have access to these and other Policies. CSVJB has provided screenshots (evidence 046 and 047) showing that staff have access to these policies and guidance. The Keeper agrees that CSVJB has measures in place to protect its information and systems from unauthorised access and misuse.
9. Data Protection	**G**	**A**	As Data Controllers, both CSVJB and the Assessor and Electoral Registration Officer are registered as such with the Information Commissioner's Office (ICO) (registration number: 7353775). A copy of the registration certificate has been supplied (evidence 027). The RMP states that CSVJB is aware of its obligations under, and is committed to adhering to, the Data Protection Act 1998. **CSVJB has committed to reviewing its Data Protection Policy as soon as practically possible which will also have regard to the GDPR which will apply from 25 May 2018. This will be supplied to the Keeper once it has been reviewed and approved. The RMP also shows a commitment to providing staff with further training in Data Protection.** **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 an up-to-date Data Protection Policy and lack of evidence of how staff are able to**

	G	G (orange)	**access the Policy). The RMP commits CSVJB to reviewing the Policy in line with the forthcoming requirements of GDPR and the Keeper requests that he is sent the updated approved version of the Policy once it becomes available.**
10. Business Continuity and Vital Records	G	G	CSVJB has submitted its Business Continuity Plan (BCP) (evidence 028) which describes its arrangements for resuming its business in the event of a disaster. It also assigns responsibility for activating and reacting to the BCP and highlights the importance of backing up data. The RMP states that the BCP is subject to regular review and is available on the intranet. CSVJB has submitted a screenshot (evidence 028A) showing how staff are able to access the BCP on the CSVJB intranet.
			The RMP also states that an IT Disaster Recovery Plan (DRP) (evidence 048) is in place for the recovery of electronic records and the Electoral Registration system. It shows the steps to be taken by IT in the event of a disaster. Also submitted is evidence of a planned test of the DRP in December 2017 (evidence 028C). The Keeper commends the commitment to ensuring that procedures and policies are operational.
			CSVJB also has procedures in place to manage the risk of potential interruptions to its business. Provided as evidence are risk registers for Local Government Elections in 2017 and a combined organisation-wide Risk Analysis (evidence 013 and 014). These tie in to the overall Risk Management Strategy (evidence 040). Regular reports are provided to the Board meeting relating to organisational risk and a sample report has been supplied (evidence 039).
			The Keeper agrees that CSVJB have procedures in place to resume business in the event of a disaster.
11. Audit trail	A	G	The RMP states that, at present, the electronic systems used by CSVJB to manage its records are able to provide audit trail information. The electronic systems used by

CSVJB are:

Applications and systems that manage electronic records for specific purposes, such as Electoral Registration, Council Tax and Non-Domestic Rating, and;

Shared drives, personal drives and intranet sites for corporate records.

The RMP states that CSVJB's Council Tax system and EROS (electoral registration) are able to provide audit trail functionality. Screenshots of the systems used by CSVJB to track actions taken on electronic records managed using bespoke systems have been submitted (evidence 050-052). The RMP also states that CSVJB uses Netwrix Auditor to track changes to electronic records managed on shared network drives. A screenshot of the audit trail functionality provided by this system has been supplied (evidence 049). The RMP also states that personal 'C' drives have been disabled and corporate records can therefore no longer be stored there. The Keeper commends this approach.

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.

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 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. **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.**
12. Competency Framework for records management staff	**G**	**G**	The RMP states that despite being a relatively small organisation with limited resources it is committed to providing appropriate training to staff with records management responsibilities. The provision of training is a commitment set out in the Records Management Policy (evidence 002). The Records Manager (see Element 2) has records management recognised as a key task in her Job Profile (evidence 003). The Records Manager has also attended various events run by the Keeper's Assessment Team on the Public Records (Scotland) Act 2011 and has achieved a Practitioner's Certificate in Data Protection. The RMP states that all staff have access to both Clackmannanshire and Falkirk Councils' online training. The modules staff are required to complete include Information Security Awareness and Records Management. A screenshot has been supplied showing how staff have access to the Records Management module (evidence 031). All staff are also required to complete the Civil Service Learning

			Module Protecting Information – Level 1. A sample completion certificate has been submitted (evidence 032). The RMP also states that specific training on the Public Records (Scotland) Act 2011 will be developed and delivered by the Records Manager to all staff. The Keeper would be interested to see a sample of this training material once it has been developed. CSVJB has also developed a Records Management Guidance Note (evidence 038) which will be included in the induction packs for all new staff. The Keeper agrees that CSVJB recognises the importance of records management and provides staff with access to relevant training.
13. Assessment and Review	**G**	**G**	The RMP states that the RMP, the Records Management Policy and the Document Retention and Disposal Schedule are subject to CSVJB's internal governance procedures and will be reviewed on an annual basis. The Management Team will be responsible for carrying out these reviews and progress or issues will be reported to the Board. The Management Team meets every six weeks and has records management as a standing item on the agenda of these meetings. The Management Team will assess the records management systems in place by: developing and implementing policies and procedures relating to the RMP and monitoring progress; monitoring projects relating to the RMP; scrutinising and reviewing the RMP and supporting strategies and policies, which will be led by the Assistant Assessor (see Element 2); approving the RMP and supporting strategies and policies. 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

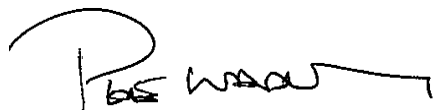|			
	G	G	that he is kept up-to-date with developments in this area. The Keeper agrees that CSVJB has measures in place to ensure that its RMP and supporting policies and procedures can be kept up-to-date.
14. Shared Information	G	G	The RMP states that in limited circumstances it shares information with other bodies. This sharing is governed by the Information Handling Policy (evidence 016). CSVJB has a number of Data Sharing Agreements in place with the Councils in its jurisdiction (Falkirk, Stirling and Clackmannanshire) relating to the sharing of education records (evidence 034-036). These agreements make provision for the secure sharing of data and also the governance of that data at the conclusion of the agreement. CSVJB has also entered into a Data Sharing Agreement with the University of Stirling relating to the sharing of electoral information (evidence 037). The Keeper agrees that CSVJB has arrangements in place to securely share information with other bodies.

6. Keeper's Summary

Elements 1-14 that the Keeper considers should be in a public authority records management plan have been properly considered by Central Scotland Valuation Joint Board. Policies and governance structures are in place to implement the actions required by the plan.

7. Keeper's Determination

Based on the assessment process detailed above, the Keeper agrees the RMP of Central Scotland Valuation Joint Board.

The Keeper recommends that Central Scotland Valuation Joint Board should publish its agreed RMP as an example of good practice within the authority and the sector.

This report follows the Keeper's assessment carried out by,

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Pete Wadley
Public Records Officer

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Robert Fotheringham
Public Records Officer

8. Endorsement of Report by the Keeper of the Records of Scotland

The report has been examined and is endorsed under the signature of the Keeper of the Records of Scotland as proof of compliance under section 1 of the Public Records (Scotland) Act 2011, and confirms formal agreement by the Keeper of the RMP as submitted by Central Scotland Valuation Joint Board. In agreeing this RMP, the Keeper expects Central Scotland Valuation Joint Board to fully implement the agreed RMP and meet its obligations under the Act.

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Laura Mitchell
Deputy Keeper of the Records of Scotland