

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

**Highland and Western Isles Valuation Joint Board**

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

**5<sup>th</sup> December 2023**

## Contents

1. The Public Records (Scotland) Act 2011 .....	3
2. Progress Update Review (PUR) Mechanism .....	4
3. Executive Summary .....	4
4. Authority Background .....	5
5. Assessment Process .....	6
6. Records Management Plan Elements Checklist and PUR Assessment.....	7-21
7. The Public Records (Scotland) Act Assessment Team's Summary .....	22
8. The Public Records (Scotland) Act Assessment Team's Evaluation.....	23

## 1. Public Records (Scotland) Act 2011

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

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

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

## **2. Progress Update Review (PUR) Mechanism**

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

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

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

## **3. Executive Summary**

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

#### **4. Authority Background**

The Highland and Western Isles Valuation Joint Board is made up of 10 elected members:

8 from the Highland Council and 2 from Comhairle nan Eilean Siar (The Western Isles Council).

The Board appoints and is responsible for the administrative oversight of the Assessor. The Assessor is responsible for assigning a value to properties for tax purposes.

The Council Tax list records the Council Tax band of every home in Highland and Western Isles

The Valuation Roll records the owners, occupiers and rateable values of business premises.

The Electoral Registration Officer is responsible for compiling the register of electors and related matters.

## 5. Assessment Process

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

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

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

### Key:

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

## 6. Progress Update Review (PUR) Template: Highland and Western Isles Valuation Joint Board

Element	Status of elements under agreed Plan 13DEC16	Status of evidence under agreed Plan 13DEC16	Progress review status 05DEC23	Keeper's Report Comments on Authority's Plan 13DEC16	Self-assessment Update as submitted by the Authority <u>since</u> 13DEC16	Progress Review Comment 05DEC23
1. Senior Officer	G	G	G	Update required on any change.	<p>Advising NRS of change of Senior Officer due to retirement of previous postholder (4 January 2023).</p> <p>Records Management Policy updated to reflect change. This Policy document was approved by the Board on 21 March 2023.</p>	<p>The Assessment Team thanks you for this notification.</p> <p>The Senior Officer remains for Highland and Western Isles VJB is Frank Finlayson, Assessor &amp; Electoral Registration Officer.</p>
2. Records Manager	G	G	G	Update required on any change.	<p>Advising NRS of change of Records Manager due to retirement of Senior Officer and appointment of previous Records Manager to promoted post (4 January 2023). Duties now passed from Assistant Assessor &amp; ERO to Depute Electoral Registration Officer / Business Manager.</p> <p>Introduction to Records Management Training carried out by For Your Info in February 2023 by the Records Manager with Practitioners Certificate in Scottish Public Records Management Course reserved for November 2023.</p>	<p>The Assessment Team thanks you for this notification. Records Manager and Keeper's Key Contact named under Element 2 remains Mandy Thomson, Depute Electoral Registration Officer / Business Manager</p> <p>Thank you for letting us know that the records manager was booked onto a training course on Scottish Public Records Management and Practitioner's Certificate acquired by the time this PUR has been finalised. This is a positive investment into the skills and</p>

					Records Management Policy updated to reflect recent changes. Approved by the Board on 21 March 2023.	knowledge of the records manager and should be commended.  For comments on Records Management Policy, please see Element 3 below.
3. Policy	<b>G</b>	<b>G</b>	<b>G</b>	Update required on any change.	<p>An updated Information Security Policy from Highland Council was approved by Corporate Resources Committee on 1 December 2022 along with the Information Security &amp; Assurance Policy.</p> <p>Our induction document has been updated to highlight that staff have a responsibility under the Highland Council Information &amp; Data Strategy and the ICT User and Network Access Control Policy.</p> <p>A copy of the Highland Council's staff password guidance was circulated on 27 February 2023 pointing out to staff the importance of computer security and what to do if they feel their password has been compromised.</p> <p>A new Records Retention and Disposal policy has been drafted for approval by the Valuation Joint Board in June 2023. All our other procedural documents have been reviewed and updated where necessary. These documents were approved by the Board at their meeting on 21 March 2023.</p> <ul style="list-style-type: none"> <li>Records Management Policy</li> </ul>	<p>Thank you for indicating under Elements 1 and 2 that the VJB's Records Management Policy has been reviewed and updated to reflect the changes in personnel.</p> <p>The Assessment Team is also grateful for this notification that multiple policies, procedural documents and guidance adjacent to the Records Management Policy have been recently updated.</p> <p>Update required on any future change.</p>



					<ul style="list-style-type: none"> <li>• Data Protection Policy</li> <li>• Personal Data Breach Policy</li> <li>• Special Category Personal Data Policy</li> </ul> <p>A new service plan was approved by the Board in February 2022. The service plan highlights the statutory responsibility that the Valuation Joint Board has under the Public Records (Scotland) Act 2011 to ensure that our records are properly managed and maintained.</p>	
4. Business Classification	<b>G</b>	<b>G</b>	<b>G</b>	Update required on any change.	<p>During the Covid-19 pandemic some electoral registration forms were scanned by an external third party. Monthly reports are sent of records held along with destruction details.</p> <p>Retention Schedule and Disposal Arrangements document has now been updated and will be included in our new Records and Retention Disposal Policy to be presented to the Valuation Joint Board in June 2023.</p> <p>We are about to embark on the process of moving our electronic files from shared network drives to SharePoint. It is anticipated that this project will be completed by the summer of 2023. Named individuals will then be responsible for overseeing destruction of files as per the Records Retention and Disposal Schedule. M365 will be used as the Board's records and information</p>	<p>Thank you for this update. It is clear that there have been numerous changes to Highland and Western Isles VJB's records management provision since the Keeper's Agreement in 2016. The Assessment Team is particularly grateful to know that an updated Business Classification Scheme and Information Asset Register is in the process of being introduced. The integration of this with the Records Retention and Disposal Schedule is noted with thanks. The reported policy reviews are also noted with thanks.</p> <p>The moving of electronic files from network drives to SharePoint is a major endeavour, but will hopefully result, and have already resulted, in improvements in discoverability of files and automated disposal</p>

					<p>management solution. Four members of staff attended SharePoint training in 2022.</p> <p>An updated business classification scheme and information asset register will be introduced into our Records Retention and Disposal Schedule in the coming months.</p> <p>Our working practices had to change during the Covid-19 pandemic and as such, all invoices are now scanned and retained in our financial management system. Delivery notes and any back-up documents are also held within the finance system. From March 2020 onwards paper documents are no longer retained and are securely shredded.</p> <p>In the coming months we will be removing paper personnel files and scanning documents into an electronic personnel system. It is anticipated that the work will be completed by August 2023.</p> <p>Our induction document has been updated to include our Records Management Policy Statement.</p>	<p>processes – provided that a business classification structure has been followed when implementing the migration, and that records naming convention guidelines have been consistently followed. The PRSA team has also developed guidance around M365 which may be of interest: <a href="https://www.nrscotland.gov.uk/files/record-keeping/public-records-act/prsa-m365-guidance.pdf">https://www.nrscotland.gov.uk/files/record-keeping/public-records-act/prsa-m365-guidance.pdf</a>.</p> <p>The information of the scanning projects is also noted with thanks – the move to largely digital operations is in line with many other Scottish public authorities. The VJB is right to consider this move as relevant to effective records structure implementation in the newly-implemented M365 SharePoint, in the form of a BCS, IAR, or similar.</p> <p>For comments on the scanning project and the records held by the third party provider, see Element 15.</p>
5. Retention Schedule	A	G	A	The RMP states that the retention schedule needs to be reviewed to ensure that provisions are in place for electronic records. The	A Records Retention and Disposal Schedule is currently under review. Due to Revaluation work, it has not been possible to finalise the retention and disposal schedule, but the working	The Assessment Team thanks you for this update. Regular review of key documentation is essential to keep it fit for purpose. Particularly as Highland and Western Isles VJB

				<p>Future Development section of this element identifies a need to clarify rules surrounding the structure of the electronic files within the shared drive and their subsequent destruction, retention, or archival transfer. This work aims to be completed within the 2016-17 financial year. The Keeper commends this initiative and requests that he is kept informed of progress in this area.</p> <p>The Keeper can agree this element on an 'improvement model' basis. This means that the Board have identified a gap in provision (lack of a structure for storing electronic records on the shared drive and the ability to systematically destroy these at the end of their retention periods) and have committed to close this gap. <b>As part of this agreement the Keeper expects to be kept informed as work progresses.</b></p>	<p>version has been provided as evidence. The legal basis for collection of information has been added to the Records Retention and Disposal Schedule along with information on destruction of electronic records and vital records.</p> <p>Evidence 1: draft Records Retention and Disposal Schedule.</p> <p>A Records Retention &amp; Disposal Schedule policy document has now been drafted and will be presented at the Valuation Joint Board meeting in June 2023.</p>	<p>is currently moving away from shared network drives and to a SharePoint-based eRDMS, it is understood that the Records Retention and Disposal Schedule will be both frequently consulted and frequently updated in the course of the project.</p> <p>The Assessment Team thanks you for providing a draft version of this document, which is entirely appropriate for the PUR process. If this was a formal resubmission, a final, formalised version would be required.</p> <p>Whilst it is clear that progress in this Element has been made since the Keeper's Agreement, this Element will remain at Amber as Highland and Western Isles VJB continues to implement a new eDRMS, and, alongside it, consistent and effective retention scheduling. The Team look forward to hearing of progress in subsequent PURs.</p>
6. Destruction Arrangements	A	A	A	The Future Development of this section notes that the authority is investigating an easier way of destroying electronic records held	We have started a project to digitise all our council tax files. A list of documents for scanning has been agreed with senior staff and once scanning has been	The digitisation project and the provided sample of paperless marked file is noted with thanks.

			<p>within the council tax and valuation roll systems. The Keeper asks that he is kept up to date as work in this area progresses.</p> <p>Aside from the bespoke business systems, an improved approach to the destruction of electronic records held within the shared drives network is also being looked at. As part of this work, individuals at a local and central level will be made responsible for identification and destruction of records at the end of their retention periods. This area of work is scheduled to be completed within the 2016-17 financial year. <b>The Keeper will need to be kept updated of the progress of this work.</b></p> <p>The Keeper agrees that the Board has procedures in place to securely destroy paper records at the end of their retention periods, obsolete hardware, and that there is a schedule for the destruction of electronic back-ups. He can accept that work is underway to improve the levels of provision for the destruction of electronic records and</p>	<p>completed, our council tax and valuation system is marked as a “paperless” file against relevant properties. Documents are then securely destroyed.</p> <p>Evidence 2: sample of paperless marked file.</p> <p>As previously mentioned, our Records and Retention Disposal Schedule is currently under review. This review will sit alongside movement of documents from our network shared drives to SharePoint. It is anticipated that workflows and document life cycles will be used to automatically trigger deletion points.</p> <p>Some of our electronic folders have recently been reviewed with large numbers of documents deleted where no longer required. These folders will be prioritised as part of our SharePoint project and are those marked as Checked on our draft Records and Retention Disposal Schedule.</p> <p>The Business Continuity Plan has been updated and approved by the Board at their meeting on 21 March 2023.</p>	<p>The major move from shared network drives to SharePoint is expected to have positive implications on reliable and consistent scheduled records destruction. The move to M365, as mentioned above, is a major one, and the VJB can expect it to take some time to embed properly.</p> <p>The recent drive to review electronic folder content and appropriately dispose of this where relevant is noted with thanks. The move away from shared drives is an excellent opportunity for some housekeeping, and it is great to hear that Highland and Western Isles VJB has taken this on board.</p> <p>For comments on the Business Continuity Plan, see Element 10.</p> <p>Whilst it is clear that progress in this Element has been made since the Keeper's Agreement, this Element will remain at Amber as Highland and Western Isles VJB continues to implement a new eDRMS, and, alongside it, consistent and effective retention scheduling. The Team look forward to hearing of progress in subsequent PURs.</p>
--	--	--	--	---	---

				can agree this element on an 'improvement model' basis, provided he is regularly updated on the progress of this project.		
7. Archiving and Transfer	A	A	G	<p>The RMP states that guidance governing the transfer of records selected for permanent preservation to an appropriate archive will be developed. Discussions have taken place concerning the transfer of Valuation Roll, Electoral Register, and Council Tax lists to the archive services of Western Isles Council and Highland Council. However these do not refer to the archiving of other records destined for permanent preservation such as Board minutes. The authority has indicated that new guidance and documentation will need to be created to cover the retention and transfer arrangements for these records. <b>The authority has committed to sending this document to the Keeper once it has been developed and approved.</b></p> <p>The Keeper can agree this element on an 'improvement model' basis. This means that the Board</p>	<p>The Records Retention and Disposal Schedule now includes provision for items which should be discussed with the archive services of both Highland and Western Isles Councils. Some transfer of documents has taken place with Highland Council in 2019, namely valuations rolls, electoral registers and some limited council tax information (not deemed valuable information). Work has still to be done with Western Isles Council.</p> <p>With the introduction of the Elections Act 2022 and the removal of the 15-year rule for overseas electors, electoral registers will need to be obtained by the Electoral Registration Officer for a longer period of time therefore, registers will be retained and not transferred to Archive Services unless duplicate copies are held.</p> <p>The Board deposits copies of the Valuation Roll and Council Tax lists to the National Library of Scotland for permanent preservation. Copies of the Electoral Register are deposited with the National Library of Scotland, British Library and National Records of Scotland</p>	<p>Thank you for this update on the archiving and transfer of records. It is good to hear that the Records Retention and Disposal Schedule takes archiving into account.</p> <p>The Assessment Team appreciates the clarification regarding the impact of Elections Act 2022 to Electoral Register retention practices and the work already done with the Western Isles Council, given in a follow-up email.</p> <p>It is clear that the records VJB is statutorily obliged to create (e.g. Council Tax Lists, Valuation Rolls and the Electoral Register), are retained for permanent preservation.</p> <p>Thank you also for providing a list of recipients to copies of the Electoral Register.</p> <p>In 2016, this Element was agreed on an improvement model basis. The Keeper indicated that they expected to have sight of the new guidance documentation within four</p>

				has undertaken to make arrangements for the archiving of all records selected for permanent preservation. The Keeper will require a copy of the guidance document mentioned above, which is under development, and also evidence showing that the arrangements cover all records selected for archiving, including for example minutes of Board meetings. <b>The Keeper will expect to receive the guidance document and further evidence no later than four months after the agreement of the RMP. Should he fail to receive this, the Keeper may re-consider his agreement of this element.</b>	<p>annually under the Representation of the People (Scotland) Regulations 2001.</p> <p>Evidence 3: List of recipients of the Electoral Register.</p> <p>Board meeting papers are held by the Highland Council for permanent preservation, and this has been updated in our Records Retention and Disposal Schedule.</p>	<p>months of the agreement of this report. However, the authority has confirmed that the new Records Retention and Disposal Schedule has since superseded this planned guidance.</p> <p>As functioning formal arrangements with the chosen repositories are in place, and a formal guidance to cover the retention and transfer arrangements has been created and implemented, this Element can be turned Green for the PURs.</p> <p>This Element is only indicative, and an upgrade to the RMP Element would only follow after a formal resubmission and the provision of appropriate evidence.</p>
8. Information Security	G	G	G	Update required on any change.	No changes other than those already mentioned in Element 3.	Update required on any change.
9. Data Protection	G	G	G	Update required on any change.	Staff have been asked to undertake Information Management and Data Protection Act 2018 & UK GDPR training via the Highland Council's Traineasy platform. Information is recorded on a spreadsheet showing date completed and assessment score. This is then backed up by Highland Council records	<p>For comments on staff training, see Element 12.</p> <p>The update on Data Protection Officers is also positive news. The Assessment Team is grateful for further clarification provided with</p>

				<p>to ensure training has been carried out. Protecting Information training previously carried out is no longer available.</p> <p>Records Management information has been introduced as part of our staff induction document. This includes our Records Management Policy Statement.</p> <p>The Board has appointed a Data Protection Officer in Lanarkshire Valuation Joint Board. Three members of staff have attended GDPR Practitioner's training with one member of staff acting as Data Protection Officer for Lanarkshire Valuation Joint Board. The three members of staff who have completed training act as internal data protection officers. One has responsibility for IT, one has responsibility for electoral and human resources with the final member of staff being responsible for governance, valuation roll and council tax matters.</p> <p>Data protection impact assessments are carried as necessary, especially for any high-risk processing.</p> <p>A Special Category Personal Data Policy and Personal Data Breach policies have been implemented. These have recently been reviewed and approved by the Board at their meeting on 21 March 2023.</p>	<p>regard to a Data Protection Officer external to the organisation.</p> <p>It is reassuring that DPIAs continue to be part of business as usual, when required, and that Data Privacy Statements remain available on the website.</p> <p>The review, update, and implementation of two key policies, Special Category Personal Data Policy and Personal Data Breach Policy, is also noted with thanks.</p> <p>For comments on the SAA Governance Committee, see Element 12.</p>
--	--	--	--	---	--



					<p>We have privacy statements that are available from our website and advice on where to find our privacy notices is available on all outgoing correspondence where personal data is being processed.</p> <p>The Assessor &amp; Electoral Registration Officer is a member of the Scottish Assessors Association Governance Committee who meets regularly to discuss and share ideas on governance issues including data protection.</p>	
10. Business Continuity and Vital Records	A	A	G	<p>The RMP states that the senior management team will identify vital records and this information will be reflected in the retention schedule. Measures will be developed to ensure that vital records can be accessed in the event of an emergency. The Keeper commends this initiative and asks that he is kept informed of the progress of this project.</p> <p>The Keeper can agree this element on an 'improvement model' basis. This means that the Board has identified a gap in provision (lack of identification of, and measures in place to protect, vital records in all formats) and has identified</p>	<p>Our Records Retention and Disposal Schedule now includes a column for vital records. During the Covid-19 pandemic, it was important to be able to retrieve vital documents when we were unable to visit office premises.</p> <p>Back-ups of our systems are carried out daily and this is documented internally.</p> <p>This information has been updated in our Business Continuity Policy document which was approved by the Board at their meeting on 21 March 2023.</p>	<p>Thank you for this update on how the Records Retention and Disposal Schedule incorporates information about vital records. The impact of Covid-19 on ways of working has been a great incentive to make sure that reliable access to these records continues, whatever the unexpected event.</p> <p>It is great to hear that Business Continuity Policy has also been reviewed to reflect these changes, and that back-ups of systems are ran regularly.</p> <p>As reported under Element 6, thank you also for letting us know that the Business Continuity Plan has recently been updated.</p> <p>Based on this update, it is likely that this Element would receive a</p>



				measures to close this gap. <b>As part of this agreement the Keeper will require to be updated as work progresses.</b>		Green status if a formal assessment was to take place today and suitable evidence was produced to reflect the improvements made. To reflect this and to celebrate progress, this PUR Element has been turned Green.
11. Audit Trail	<b>G</b>	<b>G</b>	<b>A</b>	The RMP states that the Board is looking at incorporating the logging information for paper files into software developed by Corona Service. The Keeper commends this endeavour to create a new system of tracking the movement of paper records and would be pleased to receive updates concerning this work.	As mentioned under element 6 we are in the process of digitising council tax files. Once this work has been finalised, we will move to digitise non-domestic files. Electronic records will be marked as paperless.	<p>Thank you for this update on continuing digitisation efforts. It is noted that Highland and Western Isles VJB continues to pursue a paperless operation where possible.</p> <p>Since the Keeper's Agreement in 2016, the electronic records management landscape has changed significantly. The change in the authority's eDRMS is a major move which will result in improvement in the automated audit trail, retention and disposal functionality in comparison to shared network drives.</p> <p>While it is noted that the authority continues to appropriately take this Element into account whilst implementing the new eDRMS, this Element has been turned to Amber to reflect that improvements on this Element are taking place. The Team look forward to hearing of progress in subsequent PURs.</p>

12. Competency Framework	G	G	G	Update required on any change.	<p>Induction document has been updated to provide details of our policies surrounding data protection. Information Management and data protection course mentioned under Element 9, which is mandatory for all new staff, with completion information recorded.</p> <p>Our previous Records Manager has attended several of the PRSA Surgeries since our RMP was submitted. The Office &amp; Support Manager has attended some of the PRSA surgeries held in 2022 (PRSA General Surgery and Advocacy). The Office &amp; Support Manager also attended a Newcomers Surgery on 24 February 2023 and is booked to attend the surgery being held on 24 April 2023.</p> <p>The Office &amp; Support Manager attended the FOI Practitioner's Conference in August 2022 delivered by the Scottish Information Commissioner.</p> <p>Two Divisional Valuers and the Office and Support Manager have enrolled on Complaints courses offered by the SPSO. The first course is a Good Complaints Handling Course which will be followed with Complaints Investigation Skills training course.</p> <p>The Office &amp; Support Manager has recently signed up to the PRSA Knowledge Hub discussion group.</p>	<p>The Assessment Team notes with thanks that Highland and Western Isles VJB staff regularly attend PRSA Surgeries. These, now largely online, can be a great opportunity to check in with the PRSA team, discuss developments in the field, and connect with other public sector records management professionals. The PRSA Team also hope that KnowledgeHub will prove a useful forum for keeping up with developments in the field and sharing resources across the public sector.</p> <p>Attendance at the FOI Practitioners' Conference in 2022, and attendance at the two Complaints courses is also noted with thanks.</p> <p>As reported under Element 9 and expanded on here, it is reassuring to hear Data Protection and GDPR training continues to be carried out, alongside other records management training. It is also positive to hear that the Assessor and Electoral Registration Officer is involved in the Scottish Assessors Association Governance Committee to discuss challenges across the Scottish Assessor landscape.</p>

13. Assessment and Review	<b>A</b>	<b>G</b>	<b>A</b>	<p>There is a commitment by the Board to assess on an annual basis the RMP and associated policies. To do so they intend to trial the use of the Archives and Records Management System (ARMS) self-assessment tool and may in the future use internal auditors to assess organisational compliance with their Plan. The Keeper is interested to hear the results of the ARMS trial. Should the Board decide not to pursue this methodology the Keeper will need to know how the authority intends to ensure their RMP remains fit for purpose.</p> <p>The Keeper can agree this element on an 'improvement model' basis. This means that the authority has identified a gap in provision (lack of methodology for ensuring regular assessment and review of the RMP and associated policies and procedures) and has identified a potential solution. <b>As part of this agreement, the Keeper will need to be informed</b></p>	<p>The Archives and Records Management System is currently unavailable.</p> <p>Over the last few years, a complete review of our HR, Governance and H&amp;S policies has been carried out. A spreadsheet has been introduced which has a column with dates for annual review of policy documents. This spreadsheet is checked on a monthly basis and any policies which require updates, are scheduled for quarterly Board meetings.</p>	<p>Section 1(5)(i)(a) of the Act says that an authority <i>must</i> keep its Records Management Plan under review. Element 13 stipulates that Records Management arrangements are regularly and systematically reviewed with actions taken when required.</p> <p>The Assessment Team thanks Highland and Western isles Valuation Joint Board for this update on widescale policy update drive, However, the VJB has confirmed that its Records Management Plan (RMP) will not be reviewed until summer/autumn 2024, in preparation for the formal resubmission. The Assessment Team commends the use of maturity frameworks, but would also recommend a regular review schedule for the RMP document itself in order to keep it fit for purpose in light of rapidly-changing business needs and technology.</p> <p>The Team also appreciates a confirmation that the Records Management Policy or Policy Statement, and other policies adjacent to the RMP, will be scheduled for regular review following the voluntary resubmission, and that public</p>

				of the assessment and review methodology the Board intends to use if it decides that the ARMS Tool is not appropriate.		<p>records management is now a standing agenda items at the monthly management team meeting.</p> <p>Participation in the PUR process is a positive step, allowing Highland and Western Isles Valuation Joint Board explore some of the changes that have taken place since the Keeper's Agreement in 2016. While the Keeper has not yet re-invited the authority to resubmit its plan for Assessment, a formal RMP review is overdue. The VJB has indicated that a voluntary resubmission is being prepared, with estimated submission in the summer/autumn 2024. This is very commendable and entirely in the spirit of the Act.</p> <p>This Element will remain at Amber.</p>
14. Shared Information	G	G	G	Update required on any change.	<p>There is not much to note under Element 14 as our procedures have largely remained the same. We are in the process of finalising data sharing/information sharing protocols with our two constituent councils on sharing of data.</p> <p>Where we are unsure of the legal basis of sharing information, we procure services from a firm of solicitors in Glasgow.</p>	<p>Thank you for letting the Assessment Team know that there have been no changes to this Element. It is reassuring to know that Highland and Western Isles VJB continues to keep information sharing protocols up to date, and seek legal advice when warranted.</p>

15. Records Created or Held by Third Parties	N/A	N/A	A	<p>This new Element was not relevant at the time of the Keeper's Agreement.</p> <p>Update required on any change.</p>	[No update.]	<p>As reported under Element 4, it is also good to hear that the VJB retains appropriate oversight of records scanned by a third-party provider during the Covid-19 pandemic.</p> <p>While this Element has not been formally Assessed, it is clear that Highland and Wester Isles VJB has considered the implications of third-party contractor managing or holding public records. This PUR Element has been given an Amber status, indicative of this ongoing work. If this was a formal resubmission, a more detailed update along with supporting documentation would be required, and a Green status might well be within reach.</p>

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

### Version

The progress update submission which has been assessed is the one received by the Assessment Team on 29th March 2023. The progress update was submitted by Mandy Thomson, Office & Support Manager.

The progress update submission makes it clear that it is a submission for **Highland and Western Isles Valuation Joint Board**.

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

### General Comments

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

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

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

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

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

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

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



Iida Saarinen  
Public Records Officer