Helen D. M. McPhee   12 July 2018
Assessor and Electoral Registration Officer
Ayrshire Valuation Joint Board
9 Wellington Square
Ayr
KA7 1HL

Dear Ms McPhee

Progress Update Review (PUR) Final Report: Ayrshire Valuation Joint Board

Thank you for your authority's submission of a Progress Update template and accompanying evidence (the Memorandum of Understanding with Ayrshire Archives) for assessment and comment by the Public Records (Scotland) Act 2011 (the Act) Assessment Team. We commend participation by authorities in undertaking, and reporting on, regular self-assessments and reviews of their records management arrangements. We anticipate that through uptake of the PUR tool, a stronger sense of collaboration and mutual support will be achieved between authorities and the Assessment Team. This will continue to enhance the culture of records management across Scotland's public authorities.

The Assessment Team has now evaluated the submission and supporting evidence and consider that Ayrshire 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.

I enclose the Assessment Team's findings with any recommendations (where applicable) in the accompanying Final Report. We would welcome your authority publishing this Final Report as an indication of the good work and progress your authority is making in its record management arrangements and to aid colleagues by sharing best practice with other authorities. The National Records of Scotland (NRS) shall publish the Final Report on its website in due course.

Ayrshire Valuation Joint Board can expect to receive its next PUR invitation in May 2019.

Yours sincerely

Elspeth Reid
Public Records Officer
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The Public Records (Scotland) Act 2011

Ayrshire Valuation Joint Board

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

4 July 2018

Contents

1. Public Records (Scotland) Act 2011

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

The Act has its origins in *The Historical Abuse Systemic Review: Residential Schools and Children's Homes in Scotland 1950-1995* (The Shaw Report) published in 2007. The Shaw Report recorded how its investigations were hampered by poor 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 Final Report sets out the findings of the Public Records (Scotland) Act 2011 (the Act) Assessment Team's consideration of the Progress Update template submitted for the **Ayrshire Valuation Joint Board**. The outcome of the assessment and relevant feedback can be found under sections 6 – 8.

4. Authority Background

Ayrshire Valuation Joint Board was established by the Valuation Joint Boards (Scotland) Order 1995 to carry out the valuation functions of East Ayrshire, North Ayrshire and South Ayrshire 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 5 Councillors representing East Ayrshire Council, 6 Councillors representing North Ayrshire Council and 5 Councillors representing South Ayrshire 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 her staff, carry out three main functions:

   1. To produce and maintain the Valuation Roll which sets out the rateable values of all *"lands and heritages"* (except where excluded by statute) for rating purposes.

   2. To prepare and maintain the Register of Electors.

   3. To produce and maintain the Valuation List which sets out the banding of all dwellings for Council Tax.

5. Assessment Process

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

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

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

Key:

G	The Assessment Team agrees this element of an authority's plan.		A	The Assessment Team agrees this element of an authority's progress update submission as an 'improvement model'. This means that they are convinced of the		R	There is a serious gap in provision for this element with no clear explanation of how this will be addressed. The Assessment

			authority's commitment to closing a gap in provision. They will request that they are updated as work on this element progresses.			Team may choose to notify the Keeper on this basis.

Progress Update Review (PUR) Template: Ayrshire Valuation Joint Board

Element	Status of elements under agreed Plan, May 2016	Status of evidence under agreed Plan, May 2016	Progress assessment status, 2018	Keeper's Report Comments on Authority's Plan, May 2016	Self-assessment Update as submitted by the Authority since May 2016	Progress Review Comment, June 2018
1. Senior Officer	G	G	G	Update required on any change	This remains unchanged	No immediate action required. Update required on any future change
2. Records Manager	G	G	G	Update required on any change	This remains unchanged	No immediate action required. Update required on any future change
3. Policy	G	G	G	The records manager is currently developing a training programme for staff which is due to be rolled out in the summer of 2016. The Keeper commends this initiative and would welcome updates on this project.	The training programme was developed and all staff are in the process of receiving training. This is a living document and will change and grow as our records management changes and improves. In addition to the above it has been compulsory for all staff to undertake an online training course provided by our lead authority on Data Protection (GDPR) and	Developing and implementing a training programme is good practice. Records management is an essential component of compliance with GDPR and it is positive to see that this interface is recognised in the training programme.

					Information Governance. The interface between Records Management, GDPR and Information Governance forms part of this online training module.	
4. Business Classification	A	G	A	The Board has outlined how it intends to develop and implement its BCS, with the project consisting of two phases and a target period for completion of two years. The Keeper applauds this endeavour and requests that he is kept informed as work continues on this project. The Board has also created document naming conventions and version control guidance for staff when adding records to the SharePoint system. The Keeper would be pleased to receive updates regarding the rolling-out of this guidance and any monitoring of compliance. The 'Future Developments' of this section of the RMP states that the Board are considering the use of an Electronic	This has moved forward significantly with a full review of our BCS and our core operating system. Our original BCS, was over complicated for AVJB. The review is nearing completion with a large number of documents moved to our SharePoint (SP) site. We are currently working on our HR documentation – it is being scanned and placed within a restricted access area within SP. There is a comprehensive content management instruction and naming convention. Adding documents to SP is restricted to a small number of staff in order that file naming, retention and responsibilities etc are clear and controlled. Two members of staff have the	There is good progress on this element and the development of a more focused and practical business classification scheme, specific to the needs of the authority, is sensible. It is good practice to review and develop a BCS that staff can understand and make use of at an operational level. This development will take time and the monitoring mechanisms put in place ensure that it remains an on-going project that senior management are aware of. Please ensure that the Keeper is kept informed as this work progresses.

	🟧	🟩	🟧	Document Management System (EDMS). Whilst funding constraints have led to a postponement of this project, the Keeper requests updates if and when the Board begins to implement an EDMS. The Keeper can agree this element on an 'improvement model' basis. This means that the authority has identified a gap in provision (the roll-out of the BCS) and has evidenced a commitment to closing this gap. Agreement of this element is dependent upon the Keeper being kept informed of the progress of this project.	responsibility for updating the SP Content Document. Now that RM is a business as usual activity and integrates itself into all the records we hold we have decided to replace the core operating system over the next 12 months and then 'back scan' our domestic files into the new system. Funding has been put in place by the Joint board for this activity. Monitoring & Compliance SP and Records Management is a standing item on the Agenda of the Management Team Meetings and any issues raised and resolved. The monitoring of the SP site is carried out by a small number of staff with allocated tasks to ensure compliance with our retention schedule etc. Future Developments Update As with a number of projects once the detail begins to	

					emerge it can involve a complete review. This is the case here where we have reviewed our 'Core Operating System' (COS) and have concluded replacement is required. The next stage in this process, as detailed above, will be the back scanning of our files.	
5. Retention Schedule	G	G	G	Update required on any change	This remains unchanged	No immediate action required. Update required on any future change
6. Destruction Arrangements	A	A	A	The Board is currently in the process of migrating electronic records from shared and personal drives to its SharePoint system. As part of this project, obsolete records will be identified and destroyed whilst user guidance concerning the naming and saving of documents will be revised and implemented. These measures, and the move to SharePoint itself, should allow a more consistent, systematic approach to applying the rules	We are well into this element of records management, with development and population of the SP site. The cleansing of information held is taking place prior to inclusion on the SP site (see above re retention etc on SP). This is linked to the revision of our BCS and over the next 6-12 months we expect to have any shared drives cleansed; a file structure in place; a naming convention	There is clear progress on the use of Sharepoint for electronic records management but it appears that this has not yet reached the stage where there is assurance of systematic destruction arrangements. In order to achieve Green on this element, the authority should have a system in place which notifies an authorised person when identified records are due for destruction and a record should be kept of these

				and disposal decisions listed in the retention schedules to electronic records. 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 systematic method for the destruction of electronic records) and has provided evidence that it is working towards closing this gap. As part of the agreement of this element, the Keeper requests that he is kept informed of progress of work in closing the gap.	in place; and retention schedules in place. We are progressing with our records management to ensure we have policies; procedures; processes in place and our people are aware of these and how they are implemented. The implementation of RM has also aided in the compliance with Data Protection and going forward to May 2018 the GDPR. The new core operating system will have electronic retention elements built into the system – which is likely to be automated. Until an appropriate system is in place I cannot expand on this at this time but will update the Keeper at the appropriate time.	destructions. In the meantime, it would be helpful to have an indication of any manual destruction of electronic records which have taken place in particular in relation to the cleansing of shared drives. Large-scale cleansing processes often present risks of records being destroyed or retained inappropriately. The authority is clearly committed to developing more robust arrangements and the Keeper would welcome on-going updates on progress.
7. Archiving and Transfer	A	A	G	The Board has stated that discussions are underway to develop a Memorandum of Understanding governing the	A Memorandum of Understanding governing the transfer of records selected for permanent	The Keeper thanks the Ayrshire Valuation Joint Board for supplying a copy of the Memorandum of

				transfer of records selected for permanent preservation between this authority and Ayrshire Archives. The finalised MoU should be in place by October 2016. The Keeper commends this initiative and asks that he has sight of the signed-off MoU once available.

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 formal agreement between the Board and Ayrshire Archives) and has provided evidence that it is working towards closing this gap. As part of this agreement the Keeper expects to be sent a copy of the signed MoU prior to October 2016. Once he receives this the Keeper should then be able to 'fully' agree the element. Should he fail to receive the finalised MoU the Keeper may choose to review his decision to agree this element and, as this is a 'compulsory' element | preservation between this authority and Ayrshire Archives – is in place. | Understanding with Ayrshire Archives. If this were a statutory assessment this would be sufficient to move the RAG rating to Green. |

				under the Public Records (Scotland) Act 2011, this may impact his agreement of the Board's RMP.		
8. Information Security	G	G	G	Update required on any change	.As mentioned in Element 3, it has been compulsory for all staff to undertake an on-line training module on Information Governance. This training module has been introduced to highlight the interface between Records Management, GDPR and Information Security. Information Security will be a critical and fundamental element of our new Core Operating System.	As with Element 3, this training is an example of good practice.
9. Data Protection	G	G	G	All staff are required to have completed compulsory online data protection training by the end of July 2016. The Board's records manager is also developing records management training but this has yet to be rolled-out. The Keeper would therefore be pleased to receive updates concerning these training	Some training has been developed and rolled out to all staff. Further training will be given by way of briefings on our revised BCS; GDPR; changes to the shared drive and the reasons for this. As mentioned at Elements 3 & 8 above, It has been compulsory for all staff to undertake an on-line training	Collaborative work with other relevant authorities to achieve compliance with GDPR is best practice. The training as referenced in Element 3 and 8 is an example of good practice and the authority is to be commended on making these connections explicit to staff via training.

				initiatives.	module in Information Governance. The Senior Officer and Records Manager received GDPR and Information Security training via one of our partner Councils. We are working collaboratively with all three Ayrshire Councils and fellow Assessors within the Scottish Assessors Association to meet all current requirements under the DPA and future obligations under GDPR, examples include the preparation and implementation of Data Sharing Agreements, Informaton Data Audits, GDPR Training, Privacy Notices etc.	
10. Business Continuity and Vital Records	G	G	G	As well as being identified in the Board's retention schedule, the Board is also working towards creating a separate Vital Records schedule which will identify vital records, detail where they are located, and	The 'Information Asset Register' is currently a work in progress and will be completed by May 2018 to comply with GDPR. This will be a comprehensive document detailing whether	It appears that the requirements for compliance with GDPR have overtaken the initial Vital Records schedule and evolved into a full Information Asset Register. This is a pragmatic

				how they are protected. The Keeper commends the creation of such a document and would welcome having sight of it once available.	the record we hold is of a personal nature or not and the proposed retention. This document will sit alongside the SP Content Document and both will give a comprehensive guide to the information we hold.	approach but it is important that the identification of Vital Records is not omitted. The Keeper would still welcome sight of this once completed.
11. Audit Trail	A	G	A	The Board is using the opportunity of the migration of electronic records to the SharePoint system to improve audit trail functionality by imposing a structure based on the BCS and by ensuring that staff comply with document naming and version control procedures. The Board is also trialling a File Removal Card system for the paper files retrieved from filing cabinets. This trial is to start in October 2016 and to last for six months. The Keeper applauds the efforts being made to improve audit trail capabilities for the Board's electronic and paper	See above on the development of SP. In addition and again detailed above a comprehensive review of our BSC is taking place. The implementation of a File Removal Card System has been delayed for the following reasons ; 1. Revaluation 2017 required every non-domestic file to be removed and used by valuation staff over a period of more than 18 months up to 1st	There are practical limits to the work that can be accomplished, but the decision to delay introducing the File Removal Card system leaves the authority more vulnerable to accidental misfiling and loss, leading to potential inefficiencies in working practices. The Assessment Team would encourage the authority to progress their decision on the back scanning project as quickly as possible.

				records and looks forward to receiving updates on the progress and success of these endeavours. The Keeper can agree this element on an 'improvement model' basis. This means that the authority has identified a gap in its record management provision (the tracking of paper records and electronic records being migrated to SharePoint) and has identified solutions which would allow it to close that gap. As part of this agreement the Keeper will need to be kept informed of the progress of this work.	April 2017. 2. The Boundary Commissions review of ward boundaries resulted in a number of properties moving between existing wards. This required the re-referencing of a substantial number of files. The work on this considerable task is still underway. 3. The planning for the back-scanning of files has taken priority. A decision was taken to await the outcome of the planning phase of the back-scanning of the files before implementing a process that would be very quickly superseded. Notwithstanding the above a procedural guidance note for the File Removal process and File Tracking Cards were produced. If the back-scanning of files is not	

	 	 	 		implemented the File Removal and Tracking procedure will be immediately implemented.	
12. Competency Framework	G	G	G	The 'Future Developments' section of this element indicates that the Board is considering a number of initiatives under this element, including making the Information Security training package compulsory for all staff, introducing training on the requirements of PRSA within the next year, and producing a PRSA staff Information Sheet which will be included in staff induction packages. The Keeper commends these planned endeavours and asks that he is kept informed of progress and that he has sight of any new documentation created.	As indicated previously, information security training has been made compulsory for all staff and an updated information sheet is included in the induction pack. The Senior Officer and the Records Manager have received specific Data Protection and Information Governance training from one of our partner Councils and have also attended various training seminars on GDPR. The Senior Officer also recently attended The Keepers PUR surgery in Irvine. PRSA training will be rolled out to all staff in the near future.	This clear commitment to training and providing support to designated records management staff is to be commended. The current focus is understandably on GDPR and information security but it is very positive to see new training being devised so that all staff understand their responsibilities under PRSA.
13. Assessment and Review	G	G	G	The RMP and associated policies and procedures will be regularly monitored through the Corporate Governance	The RMP and associated policies and procedures continue to be a standing item for the Corporate	The review procedures are good practice, keeping records management as an integral part of the authority's

				Forum and the use of a self-audit mechanism. In future the Board may consider use of the Archives and Records Management Services (ARMS) Quality Improvement Framework as a tool for measuring compliance. The Keeper welcomes this proactive approach to regular self-assessment, and asks for updates, particularly if internal reviews lead to significant changes in records management arrangements.	Governance Forum and the Assessors Management Team meetings. Records management procedures are regularly discussed and reviewed at both of these meetings. Records Management also form part of our Corporate Risk Register which is also discussed at every Corporate Governance Forum, Management Team meetings and reported twice yearly to the Elected Members of Ayrshire Valuation Joint Board. Unfortunately the use of the Archives and Records Management Services Quality Improvement Framework has still to be considered in detail. It is still our intention to consider this further when time and resources allow.	acknowledged responsibilities. Using relevant modules of ARMS as a tool for regular self-assessment can be a very effective method of ensuring continuing compliance. The Keeper has endorsed the use of ARMS and the Assessment Team can offer advice if the authority opts to use ARMS.
14. Shared Information	**G**	**G**	**G**	Update required on any change	The implementation of GDPR has required AVJB to review how, why, where and with whom it shares	This development is good practice and demonstrates that the authority is well aware of its responsibilities in

				information. New and refreshed Data Sharing Agreements, Privacy Notices etc are being introduced prior to 25th May 2018. This is a substantial undertaking that will continue beyond 25th May 2018, We aim to update The Keeper as this process evolves.	this area.

The progress update submission which has been assessed is the one received by the Assessment Team on 20 March 2018. The author of the progress update submission is **John McConville, Head of Valuation Services & Assistant ERO**.

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

7. PRSA Assessment Team's Summary

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

General Comments

The Ayrshire Valuation Joint Board continues to take its records management obligations seriously and is working to bring all elements into full compliance. The provision of the signed Memorandum of Understanding with Ayrshire Archives would enable the RAG assessment to move to Green if this were a statutory review and the authority is to be commended for achieving this.

The focus on GDPR compliance is necessary and the authority's approach to incorporate GDPR compliance with wider aspects of records management is positive. The training being provided to all staff along with more specific training for relevant senior staff ensures that records management becomes well understood as part of everyone's responsibilities. The Team recognise that making progress on the Business Classification Scheme and the Audit trail are closely connected and the comprehensive review will take time to complete. It is sensible to cleans electronic files while moving to a new electronic system but this does appear to create a risk that during the development and implementation phase some information could be inappropriately managed. The monitoring arrangements described should be used to mitigate these risks. The Team commends the progress evident in this work and would welcome updates on these projects in future PUR submissions.

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

8. PRSA Assessment Team's Evaluation

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

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

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

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Elspeth Reid
Public Records Officer