

The Public Records (Scotland) Act 2011

**Dumfries and Galloway Council
Dumfries and Galloway Licensing Board
South West of Scotland Transport Partnership (SWestrans)**

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

31st December 2024

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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 Dumfries and Galloway Council and Licensing Board and SWestrans. The outcome of the assessment and relevant feedback can be found under sections 6 – 8.

4. Authority Background

Dumfries and Galloway Council is a unitary authority which provides all local government services for the Dumfries and Galloway area. The Council Headquarters are located in Dumfries. There are 43 councillors.

Licensing is the responsibility of licensing boards under powers contained in the Licensing (Scotland) Act 2005. Local licensing boards have wide discretion to determine appropriate licensing arrangements according to local needs and circumstances and their own legal advice. Each local government area must have a licensing board. Dumfries and Galloway Licensing Board consists of 24 Board members divided into 4 districts.

Since the enactment of the Lands Valuation (Scotland) Act 1854, Assessors have been responsible for the valuation of all heritable properties for local taxation purposes within their respective valuation areas. Currently all rateable properties are shown in the Valuation Roll and domestic subjects are contained within the Council Tax List. These documents form the basis for levying non-domestic rates (Valuation Roll) and Council Tax (Council Tax Valuation Lists). Each of the 32 Councils within Scotland is a valuation authority and responsible for appointing an Assessor who must in turn compile and maintain a Valuation Roll and a Council Tax Valuation List.

South West of Scotland Transport Partnership (SWestrans) is one of seven Regional Transport Partnerships in Scotland and covers an area contiguous within the boundaries of Dumfries and Galloway Council. The Partnership Board consists of five Councillor members and two external members, one from Scottish Enterprise and one from NHS Dumfries and Galloway.

5. Assessment Process

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

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

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

Key:

G	The Assessment Team agrees this element of an authority's plan.	A	The Assessment Team agrees this element of an authority's progress update submission as an 'improvement model'. This means that they are convinced of the authority's commitment to closing a gap in provision. They will request that they are updated as work on this element progresses.	R	There is a serious gap in provision for this element with no clear explanation of how this will be addressed. The Assessment Team may choose to notify the Keeper on this basis.
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6. Progress Update Review (PUR) Template: Dumfries and Galloway Council and Licensing Board and SWestrans

Element	Status under agreed Plan 12FEB19	Progress review status 15SEP22	Progress review status 31DEC24	Keeper's Report Comments on Authority's Plan 12FEB19	Self-assessment Update 30MAY2022	Progress Review Comment 15SEP22	Self-assessment Update as submitted by the Authority since 15SEP22	Progress Review Comment 31DEC24
1. Senior Officer	G	G	G	Update required on any change.	There are no changes with Element 1.	Thank you for letting the Assessment Team know that there have been no changes to this Element. Update required on any change.	As of 1st April 2024, there is a new Council structure. SIRO (Lorna Meahan) has not changed but the post is now responsible for Information Governance (See Appendix 1).	The Assessment Team is grateful for this update and supporting evidence provided. Update required on any change.
2. Records Manager	G	G	G	Update required on any change.	There are no changes with Element 2.	Update required on any change.	New Information Management Officer, James Cox started in post on 3rd April 2023. Since being in post, he has undertaken the Practitioner Certificate in Scottish Public	Thank you for this update which has been noted. It is also positive that the IMO has recently undertaken a formal qualification in Scottish Public Sector Records Management.

							Sector Records Management delivered by Frank Rankin, For-Your-Info.	
3. Policy	G	G	G	Update required on any change.	All records management policies and accompanying document framework were updated as part of the annual review in January 2021 and January 2022. We are currently reviewing and updating the Council's Information Management Strategy and re-branding this to Information Strategy. The Strategy will be taken to Committee in October for Members consideration and approval.	The Team thanks you for this update on continuing regular records management policy suite review, as well as the ongoing work to rebrand the Information (Management) Strategy.	New policies and guidance that have come from the Information Strategy Programme. Draft GenAI Policy has been developed and is being tested with a small testing group. November 2023 all policy suite have been reviewed.	Element maintains that the authority should have an appropriate policy statement on records management. Thank you for providing the Assessment Team with this update on additional relevant records management policy suite changes, including new policies and existing policy review.
4. Business Classification	A	A	G	The RMP states that the BCS has not been implemented across the Council's shared drives. The Council are currently undertaking a project to	Work is still ongoing to apply automated business classification through SharePoint Online. We have reframed our EDRMS	Thank you for this update on ongoing work regarding Business Classification	BCS & RRS has been combined, reviewed and transferred to MS List format.	Thank you for updating the Assessment Team on the completion of a

				<p>implement SharePoint 2016 as an EDRMS. This will include additional records management functionality through an add-on provided by a third party. The RMP states that the BCS will be used to underpin the design of the EDRMS. The RMP states that the SharePoint 2016 infrastructure has been built on the Council's servers and the third party software has been installed and configured. Work to pilot the EDRMS prior to it being rolled out across the rest of the organisation is ongoing. Screenshots of the Pentana corporate reporting system have been submitted (evidence 041). This shows that the Council is aiming for full implementation of the EDRMS by the end of December 2019. The Keeper requests that he is kept informed of the progress of this work.</p> <p>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 implemented</p>	<p>project to review the overall information architecture and in February 2022 we brought in external information governance partners, HJBS to support the review of our information architecture. This will inform the next stage of the project to bring in a technical partner to move unstructured information from shared drives to SharePoint online where business classification and retention automation can be applied through Microsoft F5 licences.</p> <p>This work is ongoing.</p>	<p>arrangements. It is clear that this is a major project, and it is good to hear that DGC is addressing the implications of EDRMS project – and moving away from shared drives – on the organisational information architecture. O365 implementation is likely to take a significant amount of time, and any automation will have to be based on an accurate and up-to-date BCS, IAR, file plan, or similar.</p> <p>This Element will remain at Amber while the work is ongoing. The Assessment Team looks forward to updates in</p>	<p>This has had a soft launch on 08 April 2024, linked with the launch of the Council's new intranet project.</p> <p>The new BCS with Retention is now being promoted through the Information Strategy Programme and Physical Records Audit.</p> <p>Work is ongoing to improve the adoption / knowledge of this scheme.</p> <p>Planned to promote at next IMG Newsletter in July 2024 and published on the News section on the new Intranet.</p> <p>Practice Survey 2024 to include</p>	<p>combined Business Classification Scheme and Records Retention Schedule. It is great to hear that DGC is actively promoting the new structure to staff.</p> <p>It appears that DGC has now closed the gap in provision identified by the Keeper in 2019 (the lack of a fully implemented BCS). Accordingly, this Element can now be turned from Amber to Green. If this was a formal resubmission, it is likely that this Element would received a Green RAG status.</p>
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				BCS) and has evidenced how it intends to close this gap. This agreement is dependent upon the Keeper being kept informed on the progress of work to close the identified gap.		subsequent PURs.	question/s around BSC.	
5. Retention Schedule	A	A	G	As mentioned in Element 4, the Council are currently implementing an EDRMS in the form of SharePoint 2016 with additional records management functionality. It is anticipated that this will allow the Council to better apply retention periods to currently unstructured information as well as making it easier to dispose of records at in line with the schedules. The RMP explains that as part of the EDRMS roll out, shared drives will be phased out and all unstructured information will be moved to EDRMS. In preparation for this work, staff will review the information held on their email and shared drives in line with the retention schedules. This will also assist in the Council's rationalisation and Smarter Working programme. Screenshots	See above – Element 4. This work is ongoing. Through our Information Management Group Newsletter, staff are regularly reminded of the need to review their records and dispose of them in line with the agreed Record Retention Schedule. This will be an important part of our move from shared drives to SharePoint online.	Thank you for this update. It is clear that the EDRMS implementation is still ongoing. It is good to hear staff are reminded to adhere to the agreed Record Retention Schedule while the O365 implementation is ongoing. It is hoped that retention labelling will assist DGC in ensuring that correct retention decisions are applied. This Element will remain at Amber while the work is ongoing.	See above – element 4	It appears that DGC has now closed the gap in provision identified by the Keeper in 2019 (the implementation of retention schedules as part of the project to develop and roll out the EDRMS). Accordingly, this Element can now be turned from Amber to Green. If this was a formal resubmission, it is likely that this Element would received a Green RAG status.

				<p>of the Pentana corporate reporting system have been submitted (evidence 041). This shows that the Council is aiming for full implementation of the EDRMS by the end of December 2019. The Keeper requests that he is kept informed of the progress of this work.</p> <p>The Keeper can agree this Element on an 'improvement model' basis. This means that the authority has identified a gap in provision (the implementation of retention schedules as part of the project to develop and roll out the EDRMS) and has evidenced 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.</p>		The Assessment Team looks forward to updates in subsequent PURs.		
6. Destruction Arrangements	G	G	G	<p>The Future Developments section states that work has been undertaken with procurement colleagues to review confidential waste contracts with the aim of having a single provider. The Keeper requests that updates are provided if</p>	<p>A single confidential waste contact was awarded to Restore Datashred in 2021 and has been rolled out throughout DGC. The contract has been awarded for 4 years with an optional</p>	<p>Thank you for this update on hard-copy confidential waste disposal arrangements through a new commercial service provider.</p>	<p>Contract is being managed by Information Management Officer and ends June 2025.</p>	<p>Under PRSA Element 6, records in any and all formats must be destroyed in a timely and appropriate</p>

				<p>there are any substantive changes to procedures.</p>	<p>extension of +1 year and will be reviewed when required.</p> <p>The contract has been reviewed to ensure it remains fit for purpose following changes to working means following the pandemic. The contract allows for onsite confidential waste consoles which are collected regularly and the option for additional ad-hoc pick-ups of confidential waste bags when required. The contract and disposal arrangements are managed centrally by the Records and Information Management Officer.</p>	<p>The Assessment Team also appreciates the clarification that the impact of more frequent home-working has also been considered when awarding the contact.</p>	<p>Variation of contract was developed in December 2024 to enable all secondary schools to have waste consoles and regular collection.</p>	<p>manner, and records of their destruction maintained.</p> <p>Thank you for providing this update, indicating that there have been no major changes to provision under this Element.</p>
7. Archiving and Transfer	G	G	G	<p>The Future Developments section of this Element states that the Council, at present, does not have a Digital Preservation strategy. One will be developed in line with best practice and in the meantime service areas are responsible for assisting in the preservation of digital records until a solution has</p>	<p>DGC are looking at potential solutions for the issue of digital preservation and working towards a Digital Preservation strategy. Until this is developed service areas remain responsible for assisting in the</p>	<p>The Assessment Team thanks DGC for this update. It appears that the Digital Preservation Strategy is still being developed, so there has been</p>	<p>No development on Digital Preservation Strategy, the Information Management Officer is working with the Heritage Officer, and this is on the service action plan.</p>	<p>Thank you for providing this update. It is disappointing that DGC has not yet been able to pursue a Digital Preservation Strategy, as this matter will become more</p>

				<p>been developed. This is a common issue among public authorities, particularly local authorities, and the Keeper welcomes the recognition of the problems associated with digital preservation and looks forward to being kept informed as the Council develops a solution.</p>	<p>preservation of digital records.</p> <p>The Council continues to run a physical archive service for paper records and staff are reminded through the Record Retention Schedule of any records which require to be transferred to the archive.</p> <p>The Archivist position within DGC has been amalgamated into a Heritage Officer role which was recruited to on a full-time basis on 27 September 2021. Within this role the Heritage Officer will complete the Archivist qualification / training. The NRS were informed of this on 8 October 2021.</p>	<p>little change in this area. The Team would like to encourage DGC to continue this development work and have more robust arrangements put in place as soon as possible, considering the proportion of born-digital public records is likely to increase rather than decrease over time.</p> <p>Thank you also for the update on paper records archiving, and the changes taken concerning the position of a qualified Archivist at DGC.</p>	<p>New Physicals Records App have been developed and will be rolling out across the Council in September 2024. This App will make the process for transferring records from office to RM Store or Archive Store paperless. Physical Records Audit 2022-24 will be concluded in July 24 with recommendations to add departments site stores to the Physical Records App, to improve management of records</p> <p>Heritage Officer has completed the Archivist qualification (Feb 24)</p>	<p>and more pressing as time passes. While robust digital archiving arrangements are now yet a requirement for a Green RAG status, the Assessment Team would prompt DGC to continue to explore its options.</p> <p>Thank you for updating the Team on the intriguing approach to use of an App to transfer physical records to the RM Store or Archive Store, and congratulation to the Heritage Officer on their Archivist qualification.</p>
	G	G	G	Update required on any change.	Appropriate information security	Thank you for this update on	Information Management	Thank you for this update on

8. Information Security					<p>policies have been applied throughout Office365 within DGCs tenancy and will continually evolve as new policies are implemented.</p> <p>DGC have taken the decision to remove the use of USB pens / ports to further protect its information security. A register is retained where users continue with access to USB ports are recorded and whether they have full access or read only (view) access to information.</p>	<p>information security policy arrangements. DGC are aware that greater implementation of O365 will have implications on these.</p> <p>It is good to hear that portable USB memory devices have received greater scrutiny, and that a register is in place to record a basic audit trail for this kind of access.</p>	<p>Officer meets monthly with the Cyber Security Officer to discuss cross over between areas.</p> <p>Cyber Security Officer is a member of the Information Strategy Programme (ISP) working group. ISP will ensure DGC will start to implement M365 functionalities with the E5 licence across the organisation.</p>	<p>continuing collaborative working between cyber security and information management departments, particularly in light of M365 implementation.</p> <p>Update required on any future change./</p>
9. Data Protection	G	G	G	<p>The Future Developments section of the Element states that the Policy will be reviewed in line with the General Data Protection Regulation (GDPR) and related UK Data Protection legislation. It also states that the refreshed Policy will be presented to the Policy and Resources Committee in January 2019. The Keeper requests that he is provided with the</p>	<p>There are no further changes to Element 9.</p>	<p>Update required on any change.</p>	<p>Information Management Officer recently completed Act Now GDPR/Data Protection Certificate.</p> <p>The Information Strategy Programme (ISP) is entering into phase 3 or 4</p>	<p>Thank you for updating the Assessment Team on relevant Data Protection training, completed by the IMO. It is also exciting to hear that the Information Strategy Programme is</p>

				<p>updated Policy when it becomes available.</p> <p>Provided the Keeper is sent a copy of the updated Data Protection Policy once it has been approved, he should be able to agree that the Council is aware of its responsibilities with regards to Data Protection and provides appropriate training for its staff.</p>			<p>phases and is due to conclude on 31 March 2024.</p> <p>ISP is supporting services to better utilize the functionalities of M365 (E5 licence) and the Information Governance Team now have access to Purview. Once records are within the M365 environment (SharePoint) Purview has solutions that will help govern, protect, and manage data.</p>	<p>now due to have been completed, assisting services to take advantage of all available M365 functionality.</p> <p>Update required on any future change.</p>
10. Business Continuity and Vital Records	G	G	G	Update required on any change.	Through the Council's Information Management Group (IMG) and Risk Group, services are being asked to review their Business Continuity Plans (BCP) and ensure that these take into consideration all information management risks.	Thank you for letting us know that services are being prompted to review their BCPs. It would also be reassuring to know that the reviews are also regularly completed.	As previously stated, through IMG services are asked to review their BCP, including considering information management risks.	Element 10 is focused on record recovery, prioritising vital records. This remains an integral part of the authority's business continuity planning.

								Thank you for letting us know that services are being prompted to review their BCPs. It would also be reassuring to know that the reviews are also regularly completed.
11. Audit Trail	A	A	A	<p>The Council is also in the process of implementing SharePoint 2016 with added records management functionality as an EDRMS. This will allow the Council to impose greater control over currently unstructured information. As the EDRMS is rolled out the use of shared drives will be phased out and the Council will also move towards greater use of electronic records. The EDRMS will be able to support robust audit trail provision, version control and the tracking and retrieval of electronic records. A sample of the audit trail functionality of SharePoint 2016 and the</p>	<p>The Information Governance team have access to Microsoft365 dashboards which includes audit capability.</p> <p>Please see elements 4 & 5, implementation of SharePoint Online is still ongoing.</p>	<p>Thank you for this update. Once implemented, O365 will provide audit capability (automatic version control).</p> <p>This Element will remain at Amber while the work is still ongoing. The Assessment Team looks forward to updates in subsequent PURs.</p>	<p>The Information Strategy Programme (ISP) is entering into phase 3 or 4 phases and is due to conclude on 31 March 2024.</p> <p>ISP is migrating services from shared drives and old SharePoint to the new M365 SharePoint environment.</p> <p>ISP is supporting services to better utilize the functionalities of M365 (E5 licence)</p>	<p>Element 11 stipulates that the location of records is known and changes recorded. The upcoming records migration is an important step in moving to a single-platform environment with automated tracking capabilities, especially now that BCS and RRS arrangements are in place.</p>

				<p>additional EDRMS functionality has been provided (evidence 050). Screenshots of the Pentana corporate reporting system have been submitted (evidence 041). This shows that the Council is aiming for full implementation of the EDRMS by the end of December 2019. The Keeper requests that he is kept informed of the progress of this work.</p> <p>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 audit trail provision for currently unstructured electronic records) and has outlined how it intends to close this gap. This agreement is dependent upon the Keeper being regularly informed of the progress of this work.</p>			<p>and the Information Governance Team now have access to Purview. Once records are within the M365 environment (SharePoint) Purview has solutions that will help govern, protect, and manage data.</p>	<p>While Elements 4 and 5 have been turned Green to celebrate the progress made, this Element will remain at Amber while the work to address the unstructured files on shared drives continues.</p> <p>The Assessment Team looks forward to being updated on progress in subsequent PURs.</p>
12. Competency Framework	G	G	G	Update required on any change.	The Records and Information Management Officer is continuing to participate in PRSA events to maintain knowledge and	Many thanks for this update on the Records and Information Management Officer's engagement	In 2023/24 the Information Management Officer conducted a council wide Information	Thank you for sharing that DGC has completed a survey assessing information management

					<p>expertise as well as keeping up to date with appropriate webinars and conferences when these are made available.</p> <p>Staff are reminded internally of the importance of Records Management through Information Management Newsletters and reminders of training where updates are made.</p> <p>All guidance documents are reviewed annually and promoted to staff internally.</p>	<p>with PRSA events and other appropriate seminars and conferences. Continuing availability of up-to-date staff training, where relevant, is also noted with thanks.</p>	<p>Management Current Practice Survey, which 535 responses. Results are being used to assess areas of support for staff and how to improve communication and resources.</p> <p>The Records and Information Management Officer is continuing to participate in PRSA events to maintain knowledge and expertise as well as keeping up to date with appropriate webinars and conferences when these are made available.</p> <p>Staff are reminded internally of the importance of Records Management through Information</p>	<p>practices in the authority. The use of the results to identify where further support, communication and/or resource is needed is very positive.</p> <p>The Records and Information Manager's continuing participation in PRSA and other events is also noted with thanks.</p> <p>Periodical newsletter circulation, up-to-date guidance documentation, and regular training prompts are also welcome signs of how the authority works to maintain records and information management awareness and</p>
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							<p>Management Newsletters and reminders of training where updates are made, including promoting the new Business Classification Scheme.</p> <p>All guidance documents are reviewed annually and promoted to staff internally.</p>	<p>knowledge in the organisation.</p>
13. Assessment and Review	G	G	G	<p>Update required on any change.</p>	<p>DGC welcome the opportunity to undergo the PUR process for the second time. DGC missed the PUR in 2021 due to service pressure and staff being relocated during the covid-19 pandemic.</p> <p>As part of the Records Management Plan the overall EDRMS project is currently funded by the Digital Transformation Project Board internally and as part of this, the project is reported monthly to the board.</p>	<p>DGC's participation in the PUR process is a positive sign of continuing engagement and continues to demonstrate commitment to regular RMP review. It is especially positive considering the EDRMS project currently under way.</p>	<p>[No update provided.]</p>	<p>Update required on any change.</p>

<p>14. Shared Information</p>	<p>G</p>	<p>G</p>	<p>G</p>	<p>The Council states that the Scottish Government has issued an Information Sharing Framework to replace SASPI. The RMP states that the Council is currently working to adopt the new framework over the coming months. As a result it will also review its information sharing arrangements and will also ensure that these are compliant with GDPR and the revised UK Data Protection legislation. The RMP commits the Council to updating related policies and guidance. The Keeper will need to be kept updated as this work progresses and sent any revised policies and procedures.</p>	<p>DGC have reviewed their internal procedures for Data Sharing Agreements (DSA) and have created a DSA request form and easy to follow process flow chart for Services who may require a DSA.</p> <p>This will form the basis of a register which will be retained as evidence of all DSAs both internally and externally.</p> <p>This allows all parties involved in a DSA to ensure they are involved at the right stage of the process and maintains a register of requested and authorised DSAs.</p>	<p>Thank you for this update on Data Sharing Agreements. It is particularly good to hear that DGC are in the process of developing a centralised DSA Register.</p>	<p>DGC have reviewed their internal procedures for Data Sharing Agreements (DSA) and have created a DSA request form and easy to follow process flow chart for Services who may require a DAS.</p> <p>This will form the basis of a register which will be retained as evidence of all DSAs both internally and externally.</p> <p>This allows all parties involved in a DAS to ensure they are involved at the right stage of the process and maintains a register of requested and authorised DSAs.</p>	<p>This update on positive DSA procedural review is noted with thanks. It is clear that continuous improvement is taking place in order to ensure continuing compliance both internally and externally. Clarifications to the organisational procedure (accompanied by updated guidance) are a positive step.</p>
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15. Public Records created or held by Third Parties	N/A	A	A	<p>Element 15 is a newer element and was not on the original Records Management Plan submitted to the Keeper.</p> <p>DGC has developed a standard contractual Records Management Clause for contracts with Legal Services. The next stage of the process will be to work with the Procurement team and progress with the inclusion of this within contracts held with Procurement.</p>	There is no change to Element 15.	<p>Thank you for letting the Assessment Team know that there have been no changes to this Element. It will remain at Amber.</p> <p>Update required on any change.</p>	<p>No change to Element 15, however discussions are ongoing with procurement to have a standardised clause/notice with regards records management in contracts, i.e. retention schedules processes, how data is stored & shared.</p>	<p>Thank you for this update. It is great to see continuous improvement under this Element, even though it was not originally assessed.</p> <p>This Element will remain at Amber.</p>
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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 31st May 2024. The progress update was submitted by James Cox, Information Management Officer.

The progress update submission makes it clear that it is a submission for Dumfries and Galloway Council and Licensing Board and SWestrans.

The Assessment Team has reviewed Dumfries and Galloway Council and Licensing Board and SWestrans' 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

Dumfries and Galloway Council and Licensing Board and SWestrans continue to take their 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 Dumfries and Galloway Council and Licensing Board and SWestrans 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