The Public Records (Scotland) Act 2011

National Library of Scotland

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

20th May 2021

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 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 National Library of Scotland. The outcome of the assessment and relevant feedback can be found under sections 6 – 8.

4. Authority Background

The National Library of Scotland was formally constituted by Act of Parliament in 1925. The National Library of Scotland Act 2012 confirmed the Library's general function as 'a national resource for reference, study, research and bibliography, having particular regard to Scotland'. The Act also modernised the make-up and responsibilities of the Board. There 12 members plus an appointed Chair on the Library's Board. All Board members are appointed by the Scottish Ministers, and follow the Nolan procedures on public appointment. Any vacancies are advertised by the Scottish Government.

The Library is a copyright and reference library. It is Scotland's largest library and one of the major research libraries in Europe. Its stated mission is: "To make a significant and lasting contribution to global knowledge and the memory of the world" and its stated vision: "To be recognised as one of the leading national libraries in Europe by using our collections and spaces to generate opportunities for learning and research while improving understanding and participation in Scotland's rich cultural life".

http://www.nls.uk/

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.

Progress Update Review (PUR) Template: the National Library of Scotland

Element	Status under agreed Plan 17JAN17	Progress status 09JAN19	Progress status 03APR20	Progress status 20MAY21	Keeper's Report Comments on Authority's Plan 17JAN17	Self-assessment Update 26FEB20	Progress Review Comment 03APR20	Self-assessment Update as submitted by the Authority since 03APR20	Progress Review Comment 20MAY21
1. Senior Officer	G	G	G	G	Update required on any change.	No change	No immediate action required. Update required on any future change.	No change	No immediate action required. Update required on any future change.
2. Records Manager	G	G	G	G	Update required on any change.	No change	No immediate action required. Update required on any future change.	No change	No immediate action required. Update required on any future change.
3. Policy	G	G	G	G	Update required on any change.	No change	No immediate action required. Update required on any future change.	Minor changes to the policy were made at its annual review in March 2021. These changes were approved by Library's senior leadership team in March 2021. The changes made are as follows: • Section 2: definition added for 'Consolidated Business Classification Scheme'. This approach to enacting retention on Biscuit (the Library's intranet) was approved by LLT in October 2019. • Section 3.4: Final sentence removed. This sentence was considered redundant in light of the fact that we have retention schedules and that files should be disposed of in accordance with their record type in accordance with those schedules. • Section 3.5: Reference to the Consolidated Business Classification and Retention Scheme added. This is because records on Biscuit will be retained in line with that structure, which may mean certain records retained for longer periods that set out in the	The Assessment Team thank National Library of Scotland for this update and note the outlined amendments to the Records Management Policy (dated 9 March 2021). A copy of the updated policy has been received and will be retained.

								Business Classification and Retention Scheme. • Section 3.9: The Government Security Classifications were updated in 2018 and the reference has been updated accordingly. The changes to the Classifications were minor and do not impact on our use of this structure. • Sections 3.13 and 4: References to 'competencies' removed in line with the Library's evolving practices. Instead, these levels are referred to as training levels, which better illustrates the objective of these levels (ie to provide differing degrees of training and support for staff based on their roles under the policy). • Section 4.2: Job title updated. • Section 6: sub-section 6.4 added, as cross reference to the Consolidated Business Classification and Retention Scheme. An updated copy of the policy is included with this response.	
4. Business Classification	**A**	**A**	**A**	**A**	…the National Library of Scotland has recently developed a *Business Classification Scheme*, … This *Scheme* has been provided to the Keeper, but has not yet been completely rolled-out in the authority. It shows an 'information asset register' style spreadsheet featuring retention decisions (see element 5) and asset owners. The Keeper agrees that this is a comprehensive classification scheme and suitable for an organisation such as the Library. He notes that a combined business classification scheme/retention schedule is	The updated BCRS was approved by the senior management team in November 2018. Subsequent changes have been made to the BCRS, following approval by the senior management team in January 2020. These changes relate specifically to Human Resources and minutes of meetings classifications. These changes have been made in line with evolving legislation and industry best practice. Work continues to support	The Assessment Team thanks NLS for this update. The amendments to the *Business Classification and Retention Scheme* are indicative of a recognition this this will be a living document subject to change as business dictates. The combination of BCS and retention in a single document (the basis of an information asset register) is commended as being likely to create a stronger business tool. The Assessment Team	Work has continued with the Office 365 specialist to build retention and classification rules into SharePoint Online, OneDrive and Microsoft Teams. We expect to roll out retention rules in these areas in April 2021. Guidance is currently in development and will be communicated to all staff prior to going live. All files within SharePoint Online and OneDrive, as well as chats and channel messages within Microsoft Teams, will be automatically 'tagged' with our default retention period: deletion 6 years after last modification. Files within SharePoint Online which require a longer retention period under	This update suggests progress continues to be made with the transition to Office 365 (O365) and implementation of classification and retention rules. The development and communication to staff of supporting policies and guidance will underpin this work. For training see element 12. The roll out of the BCRS and the application of standardised automated retention tags across O365 applications is noted. This, along with the outlined process for assigning longer retentions indicates NLS are

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					likely to provide a stronger business tool than having these as separate documents… The Keeper agrees that, with an organisation the size of the Library, it is inevitable that progress will be made on an incremental basis. However, the Keeper will expect to see continual progress over the next year. **The Keeper agrees this element of the National Library of Scotland's records management plan under 'improvement model' terms. This means that the authority has identified a gap in provision (a full business classification scheme has yet to be rolled-out in the organisation) and have put measures in place to close that gap. The Keeper's agreement is conditional on him receiving updates as the BCS project progresses.**	staff in incorporating classification and retention rules from the scheme into the management of their current records. The Library has been working with an Office 365 specialist since October 2019 to design and build a new SharePoint Online platform with the capability to classify emails and electronic records in accordance with the BCRS. It is expected that this new platform will be rolled out to all staff by the end of the 2020 calendar year.	notes the proposed adoption of a SharePoint solution in 2020. This is bound to be incremental and take several years to bed-in properly. The Assessment Team remind NLS of the importance of "appropriate polices, governance and staff training" in making this major project a success. Comments under element 5 below suggest that NLS is aware of this aspect of the project and is appropriately addressing it. The Assessment Team looks forward to updates in subsequent PURs. This element remains at Amber while this work is ongoing.	the BCRS can be 'tagged' by the user with the relevant record type from the BCRS. Each record type is associated with the required 'rolled-up' retention period from the Library's BCRS: 6 Year Review, 20 Year Review or Permanent. This utilises a 'rolled-up' version of our BCRS and will ensure that files will be classified according to the BCRS and retained or disposed of accordingly.	well placed to ensure appropriate application of the combined schedule. The Assessment Team look forward to updates on this work in future PUR submissions. This element remains at Amber while this work is ongoing.
5. Retention Schedule	A	A	A	A	the Keeper will expect to see continual progress over the next year. **The Keeper agrees this element of the National Library of Scotland's records management plan under 'improvement model' terms. This means that the authority has identified a gap in provision (retention schedules will not be imposed until the full business classification scheme is operational) and have put measures in place to close that gap. The Keeper's agreement is conditional on him receiving updates as the business classification /retention project progresses.**	The Library has been working with an Office 365 specialist since October 2019 to design and build a new SharePoint Online platform with the capability to classify all emails and electronic records in accordance with the BCRS. It is expected that this new platform will be rolled out to all staff by the end of the 2020 calendar year. Familiarisation with the BCRS continues to increase. In preparation of migrating to SharePoint Online staff were required to review and weed electronic records on the current intranet in accordance with the BCRS. Further guidance on managing electronic records within the new	**See element 4 above.** The Assessment Team commends the decision to use the SharePoint migration as an opportunity to data cleanse.	Work has continued with the Office 365 specialist to build retention and classification rules into SharePoint Online, OneDrive and Microsoft Teams. We expect to roll out retention rules in these areas in 2021. Guidance is currently in development and will be communicated to all staff prior to going live. All files within SharePoint Online and OneDrive, as well as chats and channel messages within Microsoft Teams, will be automatically 'tagged' with our default retention period: deletion 6 years after last modification. Files within SharePoint Online which require a longer retention period under the BCRS can be 'tagged' by the user with the relevant record type from the BCRS. Each record type is associated with the required 'rolled-up' retention period from the Library's BCRS: 6 Year	See element 4 for comments on the BCRS and ongoing migration to O365. The opportunity for staff to engage with and become more familiar with the BCRS during this period of data cleansing and the availability of staff support sessions is commended by the Assessment Team. For training see element 12. This element remains Amber while work is ongoing, however progress is evident.

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						platform will be provided to staff as it is rolled out.		Review, 20 Year Review or Permanent. This utilises a 'rolled-up' version of our BCRS and will ensure that files will be classified according to the BCRS and retained or disposed of accordingly. Familiarisation with the BCRS continues to increase. The next stage of the migration process focuses on migrating content from the Library's shared drives into SharePoint Online and OneDrive. Staff are being asked to review and weed their files in accordance with the BCRS before moving their files. Virtual drop-in support sessions are being run throughout February 2021 to aid this process.	
6. Destruction Arrangements	A	A	A	A	.. the Library notes in the *Plan*: ""The Library plans to review our processes for storing electronic data and to make suitable adjustments as required to enable the proper destruction of records. We expect to begin this review by the end of 2018." **The Keeper accepts this recognition and agrees the suggested action.** As noted above, The *Records Disposal Procedures* document (page 11) agrees a target for end 2018 for this work to commence and the Keeper will require a update on this issue after that. He is satisfied that back-up copies of electronic records are presently being held for business continuity purposes (see element 10). **Electronic: Until the *Business Classification Scheme* is operational in the Library, the destruction of electronic records will be awkward to sufficiently monitor … The Keeper acknowledges that the National Library of Scotland have correctly identified this gap in provision.**	Work has continued to focus on the destruction of content from our email archive. The Library's email archive now only contains emails from May 2013 to October 2018. The Digital department are working on setting up annual deletions of the archive, following an approach approved by the senior management team, which will result in the remainder of the archive being deleted in stages by 2024. The Library has been working with an Office 365 specialist since October 2019 to design and build a new SharePoint Online platform with the capability to classify all emails and electronic records in accordance with the BCRS. This will help to ensure that electronic records are disposed of in line with the BCRS as records can be reviewed and deleted based on retention labels. No change to the third party contract for the	The Keeper agreed the original NLS Records Management Plan on an improvement model basis partly on the grounds that the authority could not be confident that staff were destroying digital records at the end of their retention periods. He was convinced that processes were in place to remedy this. The Assessment Team is pleased to acknowledge that the authority is working hard to be compliant in this element. Clearly, once all the public records of the authority are managed on the O365 system the routine and controlled destruction of electronic records should be more robust. However, this functionality will probably not be universally operational for some time. In the meantime it will remain important that staff are correctly prompted to destroy records appropriately. The example of e-mail review shows that NLS are pursuing this.	An annual deletion schedule has been put in place which will result in the remainder of the email archive being deleted by January 2024. The most recent deletion took place in January 2021 which removed emails dated January to December 2015. No change to third party contract for the destruction of physical records. The Office 365 classification and retention roll out (described in detail in elements 4 and 5) which is planned to go live in 2021, will ensure that electronic records are disposed of in line with the BCRS as files will be automatically deleted or flagged for review based on their retention tag. The Covid-19 crisis and the closure of the Library's physical premises to almost all staff by 24 March 2020 has had a significant impact on the completion of a number of records management tasks including finalising confidential waste disposal procedures at the three remaining Library buildings. This work had	See elements 4 and 5 for BCRS and migration to O365. The Assessment Team note the update on the introduction of an annual email archive deletion schedule and the target date of 2024 for the completion of this project. We also note confirmation that the third party contractor for destruction of physical records remains the same. It is understandable that the Covid-19 pandemic and closure of buildings has had a significant impact on scheduled projects. We look forward to updates on confidential waste disposal procedures in future PUR submissions. Work towards the systematic destruction of electronic records is clearly progressing with the implementation of O365 and the project now in place to manage the email archive. As with elements 4 and 5, while this work is ongoing this element will

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					The Keeper agrees this element of the National Library of Scotland's records management plan under 'improvement model' terms. This means that the authority has identified a gap in provision (systematic destruction of electronic records will not be imposed until the full business classification scheme is operational and back-up copies will be better managed using appropriately modified or updated systems) and have put measures in place to close that gap. The Keeper's agreement is conditional on him receiving updates as the business classification/retention project, and the electronic records systems review, progresses.	destruction of physical records. Facilities for the destruction of confidential physical records are in the process of being updated. Facilities in two of the Library's buildings have been updated, with less secure cardboard bins and ribbon shredders replaced by locked waste cabinets and crosscut shredders. Improved and consistent signage, providing guidance on which disposal method to use for different forms of paper/documentation waste, have been posted. Work is ongoing to carry out these improvements in the remaining Library's three other staffed buildings.	This element remains at amber during the SharePoint migration/roll-out. The Assement Team notes the update regarding the destruction of confidential hard-copy records. The provision of secure confidential waste bins for staff is a notable improvement in provision and is to be commended.	been scheduled to take place in the first quarter of 2020 – 2021. Due to Covid-19 the timeline for this work is unclear.	remain Amber.
7. Archiving and Transfer	**A**	**A**	**G**	**G**	**The Keeper can agree that the National Library of Scotland have identified a suitable repository for archive transfer as required by the Act but, in light of statements in the *Plan* regarding the actual transfer arrangements, agrees this aspect of the Library's records management provision under 'improvement model' terms. His agreement will therefore be conditional on the Library showing evidence of formalising the transfer of records selected for permanent preservation.**	The Digital Preservation Policy and Plan was approved by the senior management team on 29 January 2019. This policy is available on our website at: https://www.nls.uk/media/1700792/2019-digital-preservation-policy.pdf	At the time of the last PUR the Library was comfortable that their hard-copy public records were being appropriately transferred for permanent preservation, but the process of archiving electronic records was still being developed. The Assessment Team is pleased to acknowledge that this has now been addressed and a formal policy approved and published. The achievement of this objective marks a measurable improvement in the records management provision in the authority. If this was a formal re-submission it is likely that this element of the Plan would turn from Amber to Green.	No change	No immediate action required. Update required on any future change.

Element									
8. Information Security	G	G	G	G	Update required on any change.	Minor updates were made to the Information Security Policy at its scheduled annual review in January 2019. The updated Information Security Policy is available on our website at: https://www.nls.uk/media/1774607/2019-information-security-policy.pdf	In their original submission NLS committed to keeping its information governance policies and guidance under review and the Assessment Team is pleased to acknowledge that this is being done. The authority's Information Security Policy is publically available. This is to be commended.	Minor updates were made to the Information Security Policy at its scheduled biennial review in January 2021. The changes were approved by senior management in February 2021. The updated policy will be uploaded to our website in sue course. A copy of the updated policy is included with this response.	The Assessment Team is pleased to acknowledge that regular reviews continue to be carried out as scheduled. We confirm receipt of the updated Information Security Policy (version 1.2, dated 28 January 2021) which will be retained.
9. Data Protection	G	G	G	G	Update required on any change.	Further data protection training was provided to staff in March and April 2019 and was targeted at those who had joined the Library since the previous sessions as well as staff who did not sign up for a session in 2018 who fall under section 22.3-22.8 of the Data Protection Policy. The training section of the Data Protection Policy (section 23) notes that these roles in particular should receive data protection training. Training sessions were also available for any members of staff who wished to re-attend.	As with all other Scottish public authorities NLS have been required to review and update their data protection procedures in light of the 2018 legislation. The Assessment Team acknowledges that the public facing Library website has been updated appropriately: https://www.nls.uk/privacy For training see element 12 below.	A new data protection training plan is in development which will utilise tools within Office 365 and the Library's recently acquired elearning platform (Learning Pool). Training will be provided in a mixture of formats: in person, live stream and video. The impact of these sessions will be measured using online quizzes and lightweight assessments.	Thank you for this update on the development of new data protection training. For training see element 12 below.
10. Business Continuity and Vital Records	A	A	G	G	… the *Plan* states: "The Library does not maintain BCPs that are specific to business information and records. The Library's current BCPs focus on restoring public services and protecting the national collections." However, the Library goes on to commit itself to "consider the design and implementation of BCPs specific to records management, such as a plan for handling loss of IT systems". The Keeper agrees this 'action'. The Keeper agrees this element of the National Library's plan under 'improvement model'	BCPs are reviewed and updated annually. They are currently stored on RIVO (the Library's health and safety/risk management software) but will be migrated into SharePoint Online once the new system has been rolled out. The Library has a Business Continuity group comprised of key stakeholders from across the organisation who meets regularly to ensure that business continuity strategy, plans and actions are kept under review. A review was undertaken of locations across the	At the time of their original submission there were concerns in NLS that the local business continuity plans did not sufficiently address record recovery. At the time of the previous PUR the Library seemed confident that digital records would now be appropriately recovered in an emergency. However, the authority identified a remaining gap in provision around hard-copy records. They committed to review procedures to close this gap. The Assessment Team is now pleased to	BCPs were successfully migrated from RIVO into SharePoint Online. The Covid-19 crisis and the closure of the Library's physical premises to almost all staff by 24 March 2020 had a significant impact on the completion of a number of records management tasks including the transfer of vital records to the Library Archive and scanning the most recent records to ensure electronic access. This work had been scheduled to take place in April 2020. Due to Covid-19 the timeline for this work is	The completion of the planned migration of business continuity plans into SharePoint Online is noted. It is understandable that the Covid-19 pandemic and closure of buildings has had a significant impact on scheduled projects. We are confident NLS remain committed to carrying out this work around hard copy records. We look forward to updates on the transfer and scanning of vital records in future PUR submissions.

					terms. This means that he acknowledges that, having identified a gap in provision (the recovery of records may not be sufficiently emphasised in business continuity procedures), the Library has developed new procedures to close that gap. His agreement is conditional on being provided with updates on the development of "BCPs specific to records management" and submission of the finalised BCPs as soon as they are available.	Library's estate where non-electronic records and documents are held in an 'inactive' capacity, other than the official Library Archive space. Particular focus was given to the location of vital records, such as building deeds. Following discussions with the Director of Business Support and the Planning and Projects Manager, work will be undertaken in the new financial year to transfer vital records, such as these building deeds, into the Library Archive for security as well as scanning the most recent records to ensure electronic access.	acknowledge that this has been done with particular emphasis on the recovery of vital records. Bringing hard-copy records into the business continuity process marks a measurable improvement in the records management provision in the authority. If this was a formal re-submission it is likely that this element of the Plan would turn from Amber to Green. For archiving see element 7 above.	unclear.
11. Audit Trail	A	A	A	A	**The Keeper is able to agree this element of the National Library of Scotland's plan under 'improvement model' terms. This means that the authority has identified a gap in provision, but is in the process of implementing programmes that will close that gap. The Keeper's agreement is conditional on his being updated as the business classification/retention project progresses, and being provided with a copy of the File Naming Convention document once it is approved and distributed.**	The File Naming Convention has been provided as with this response. Training for SharePoint Online will incorporate education and guidance for implementing the File Naming Convention in the new platform.	The SharePoint migration should greatly increase the control over document tracking although it will take some time for this to be universally applied in the authority. However, in the short term the Assessment Team would expect the populated BCS/Retention Schedule to strengthen this element. (For comments regarding the SharePoint migration and the Information Asset Register see element 4 above). Until the *Business Classification Retention Scheme* is completed and rolled-out this element remains at Amber (it is likely to match element 4). The Assessment Team looks forward to updates in subsequent PURs. The Assessment Team acknowledge the receipt of the *File Naming Convention* guidance. This document will be retained in order that the authority's submission	The File Naming Convention was updated in January 2021. The updated File Naming Convention has been provided with this response. A new data protection training plan is in development which will utilise tools within Office 365 and the Library's recently acquired elearning platform (Learning Pool). Training will be provided in a mixture of formats: in person, live stream and video. The impact of these sessions will be measured using online quizzes and lightweight assessments. Education on the file naming convention will be included in this training. The Office 365 classification and retention roll out (described in detail in elements 4 and 5) which is planned to go live in 2021, will ensure that we can maintain an audit trail for electronic records. A retention log will be automatically updated to track files which are pending review or have been deleted.	Thank you for this update and for providing a copy of the File Naming Convention guidance (dated 7 January 2021), which will be retained. The incorporation of this guidance into the new data protection training plan is noted. For training see element 12. See elements 4, 5 and 6 for BCRS and migration to O365. Audit trail capabilities will be greatly improved with the move to O365 and will support automated processes like the retention log to track files. While this work is ongoing this element will remain Amber.

							can be kept up-to-date.		
12. Competency Framework	G	G	G	G	Update required on any change.	No change	No immediate action required. Update required on any future change. The Assessment Team notes that in 2019 NLS provided data protection to staff particularly targeting those who recently joined the Library (but open to others).	No change	Work towards enhancing staff training and the provision of guidance in response to the O365 implementation and updated policies is evident in this PUR submission (see elements 4, 5, 9 and 11). Specifically, a newly acquired e-learning platform, range of training formats and systems to measure impact are to be commended (see elements 9 and 11). No immediate action required. Update required on any future change.
13. Assessment and Review	G	G	G	G	Update required on any change.	No change	No immediate action required. Update required on any future change.	No change	No immediate action required. Update required on any future change.
14. Shared Information	N/A	N/A	N/A	N/A	Update required on any change.	No change	No immediate action required. Update required on any future change.	No change	No immediate action required. Update required on any future change.

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 13 April 2021. The progress update was submitted by Fredric Saunderson, Rights and Information Manager.

The progress update submission makes it clear that it is a submission for **National Library of Scotland**.

The Assessment Team has reviewed National Library of Scotland'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

National Library of Scotland 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 National Library of Scotland 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,
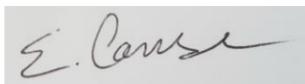
Liz Course
Public Records Officer