The Public Records (Scotland) Act 2011

Scottish Parliament
Scottish Parliamentary Corporate Body
Scottish Commission for Public Audit

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

20 October 2020

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 **Scottish Parliament, Scottish Parliamentary Corporate Body and Scottish Commission for Public Audit.** The outcome of the assessment and relevant feedback can be found under sections 6 – 8.

4. Authority Background

The Scottish Parliament is the devolved, national, unicameral legislature of Scotland, located in the Holyrood area of the capital, Edinburgh. The Parliament is a democratically elected body comprising 129 members known as Members of the Scottish Parliament (MSPs). Members are elected for four-year terms under the additional member system. As a result, 73 MSPs represent individual geographical constituencies elected by the plurality ("first past the post") system, with a further 56 returned from eight additional member regions, each electing seven MSPs.

http://www.scottish.parliament.uk/

The Scottish Parliament Corporate Body is responsible for ensuring that the Parliament is provided with the property, staff and services it requires.

http://www.scottish.parliament.uk/abouttheparliament/16231.aspx

The Scottish Commission for Public Audit was established under Section 12 of the Public Finance and Accountability (Scotland) Act 2000 and is made up of 5 MSPs. The main areas of responsibility of the Commission are to:

(a) Examine Audit Scotland's proposals for the use of resources and expenditure and report on them to the Parliament;
(b) Appoint a qualified person to audit the accounts of Audit Scotland;
(c) Lay before the Parliament and publish a copy of Audit Scotland's accounts and the auditor's report on them;
(d) Appoint three of the five members of Audit Scotland on such terms and conditions as the SCPA determines
(e) Appoint one of these three members to preside at meetings of Audit Scotland.

http://www.scottish.parliament.uk/parliamentarybusiness/1704.aspx

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: Scottish Parliament, Parliamentary Corporate Body and Scottish Commission for Public Audit

Element	Status of elements under agreed Plan 23MAY14	Status of evidence under agreed Plan 23MAY14	Progress assessment status 22FEB19	Progress assessment status 20OCT2020	Keeper's Report Comments on Authority's Plan 23MAY14	Informal assessment Comment 2013	Progress Review Comment 22FEB19	Self-assessment Update as submitted by the Authority since 22FEB19	Progress Review Comment 20OCT2020
1. Senior Officer	G	G	G	G	Update required on any change.	The Assessment Team recognises the on-going initiative being undertaken by the authority and consider that this update demonstrates Scottish Parliament's continued compliance under this element.	This update was noted in 2017 with thanks.	No change	No immediate action required. Update required on any future change.
2. Records Manager	G	G	G	G	Update required on any change.	Confirmation of Mr Hobbs' continuing role is provided by the 'Records Management Policy' signed off by the Chief Executive in January 2017 (Evidence 08) which states that Mr Hobbs is directly involved in 'records management and the implementation of associated policies, procedures and guidance'. The Team thanks Scottish Parliament for submission of this evidence.	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. The Keeper commends the authority's commitment to review the policy every three years and would welcome being sent copies of any updated policy.	The submission of the latest iteration of the *Records Management Policy* (Evidence 08), signed off by the Chief Executive in January 2017, demonstrates that the Scottish Parliament continues to take its obligations under this element seriously. The *Policy* outlines and	The Keeper thanks the Scottish Parliament for keeping its submission up to date. Review and updating of policies and strategies is welcome and contributes to the statutory requirement to keep the RMP under review.	No change. The Records management policy will be updated prior to the submission of the Scottish Parliament's revised plan in 2021.	No immediate action required. Update required on any future change.

					summarises the importance and role of records, explains the value of good records management, and identifies the legal and regulatory obligations with which they must comply. Particularly commendable is the outlining of staff responsibilities and obligations. The Assessment Team believe this *Policy* will help embed a culture of good records management throughout the authority by outlining the value of having 'a defined and consistent approach to making and maintaining full and accurate records of transactions and official activities in accordance with good practice and legislative requirements'. This aim is supported by documents including the *Records Management Strategy* (Evidence 09) and *Records Management Procedures* (Evidence 12), both of which explain how this records management culture will be sustained. Reference is made to various procedures including the use of a records system (SPShare) for storing and managing electronic records, adherence to naming conventions and application of relevant metadata, the disposal of records in accordance with the retention schedule, and ensuring information security and compliance with legislation such as FOISA. As these documents are aimed at staff, the inclusion of a glossary and the use of		

					helpful examples are commended as they will likely help bring about a consistency of approach.			
4. Business Classification	A	A	A	G	The Keeper would like to be kept informed of the progress being made by the authority in the implementation of their new EDRM system (Sharepoint with a bolt-on) and in particular the proposed Document and Record Management (DRM) business classification project. The Keeper commends the establishment of local records management champions and would be pleased to receive updates concerning their roles and accomplishments. The Keeper agrees this element of the Scottish Parliament's RMP on Improvement Model terms. This means that he is convinced of the authority's commitment to implement the EDRM solution fully over time, but would request that he is updated as this project progresses.	The updated version (Evidence 17) of the business classification scheme/file plan shows the Assessment Team that this authority continues to classify record series on the basis of the functions and activities from which they are created (one such example is 002 Parliamentary Business – 002.005 Session 5 – 003. Inquiries). Although this must remain a business decision for the authority, a functional approach to classification is considered best practice. This scheme appears to comprehensively account for the authority's functions and activities, and although the file plan does not go down to the level of individual records this is not a requirement under this element. However it is a requirement for authorities to demonstrate that the business classification scheme/file plan is applied to, and provides the structure for, the records management systems in operation. The submission of the *Records Management Maturity Model and Road Map* (Evidence 01) indicates that since the Keeper's agreement of the Scottish Parliament's Plan, extensive work has been undertaken in	The planned activities from the RMP of 2014 (ie: 4.1 review and roll-out of the corporate file plan and 4.2 development and implementation of file plan guidance) were completed and reported in 2017. As there have been no further changes reported since 2017, there is no change to the Assessment Team's comments of 2017.	No change. The business classification scheme continues to be applied to records, demonstrating the SPCB's commitment to classify records series on the basis of the functions and activities from which they are created. Exports/screenshots will be submitted with the Scottish Parliament's revised plan in 2021 as evidence of its application.	The authority has used the PUR process to keep the Keeper up to date on progress under this element. He understands from these updates that the authority has achieved its goals under this element. He will therefore look forward to taking receipt of the authority's evidence, policies, exports/screenshots, etc., under the 2021 formal submission. With evidence supporting compliance under a formal submission, including evidence in support of hard copy records covered by the BCS, the Keeper will revisit the RAG status of this element .

	■	■	■	■		rolling-out the SharePoint with a bolt-on (SPShare) solution through the Document and Records Management (DRM) project. The *Maturity Model* notes that this system is now embedded and that the 'corporate file plan is used in the DRM system which is used as the sole repository for SPCB digital records'. This work is applauded by the Assessment Team because structuring this system around the BCS will 'enable the context of each record and its relationship to other records to be understood' and will enhance capabilities in fields such as the automated disposal of records and audit trail functionality. In the event of a future statutory assessment, the Keeper will need to have sight of evidence supporting the statements made in the *Maturity Model*. This could include screenshots from SPShare showing the classifying of records according to the file plan. To ensure full compliance under this element the Keeper will also ask for evidence demonstrating that the paper records generated by the Scottish Parliament are equally covered by and classified in accordance with the approved file plan. The Assessment Team consider that the Scottish Parliament have made extensive progress under this		

					element through the rolling-out of the DRM system (SPShare). The submission of evidence showing that this system is structured according to the business classification scheme/file plan, and that paper records are equally covered, should be sufficient for the awarding of an improved RAG status in future assessments.			
5. Retention Schedule	G	G	G	G	The Keeper welcomes the authority's decision to review the *Retention Schedule* every three years as part of the *Records Management Policy* and to establish the automatic application of retention rules to records through the proposed Document and Records Management (DRM) project. The Keeper would be pleased to receive updates on the progress of these initiatives.	…this update demonstrates Scottish Parliament's continuing compliance with the Keeper's expectations under this element. The updated *Records Management Procedures* (Evidence 12) document succinctly explains to staff the records lifecycle and explains the importance of retaining records for business activities and legal compliance. Issuing such guidance to staff is considered good practice and likely to bring about a culture of good records management. This document similarly notes the importance of applying retention/disposal/archiving decisions to ensure that the authority does not hold records for longer than is required. This is equally crucial as it will ensure business efficiency and will reduce the risk of the authority falling foul of its statutory obligations under legislation such as the Data Protection Act 1998. Furthermore, this document also makes clear that the work to fully roll-out the	It is very positive that the Scottish Parliament continues to review and update the retention schedules. Two of the planned activities from the RMP of 2014 (ie: 5.2 updating of procedures, 5.3 automation of retention rules) were completed and reported in 2017. Planned activity 5.4 was reported as partially complete in 2017. The Assessment Teams' comments in 2017 remain current for these three activities. Since 2017, additional work has been completed on planned activity 5.1 (ie: review and updating retention schedules). The authority is to be commended for continuing to critically assess, amend and improve arrangements that were already robust enough to achieve a green rating.	No change. An updated retention schedule is in development and will be implemented prior to the submission of the Scottish Parliament's revised plan in 2021. Planned activity 5.4 – partially complete. Work on this activity has been paused until migration of documents and records from SPShare (SharePoint 2013) to SharePoint Online, scheduled to start late 2020.	No immediate action required. The assessment team commends the authority for continuing to pursue improvement under this element. Understandably, further progress must wait until the planned migration is complete. The Keeper will look forward to learning more, and having sight of the updated retention schedule, under the formal submission next year.

| | | | | | SPShare system has resulted in the automated retention of electronic records in accordance with the retention schedule; 'retention rules in SPShare are applied to records automatically' and 'records are…retained here for pre-determined periods in accordance with the SPCB records retention schedule'. This is commended by the Assessment Team. There is also a clear demonstration of the procedure for marking documents as records to ensure they are captured within SPShare and for the consistent application of retention rules to classes of records rather than individual documents. This is recognised as an appropriate approach to managing records.

One area for further work identified in both this document and the *Records Management Maturity Model and Road Map* (Evidence 01) is encouraging staff to regularly review documents, delete where appropriate, and to mark others as records to ensure their capture within SPShare. It is anticipated that the automated disposal of documents after two years will prompt staff to review documents as a matter of course. The Team would be interested to learn of the work being done in this area and the success of this venture. | | | |

6. Destruction Arrangements	G	G	G	G	The Keeper needs to be informed of any changes to how electronic records are destroyed as a result of the rolling out of the Document and Records Management (DRM) project.	Whilst the Scottish Parliament's destruction arrangements demonstrated compliance with the Keeper's expectations in 2014, it was recognised that new provisions would come into being following the roll-out of the SPShare system. The Assessment Team therefore thank the authority for receipt of updates in this area. The *Records Management Maturity Model and Road Map* (Evidence 01) highlights that all areas pertaining to record destruction are 'Embedded'. This is to be commended, as it indicates that all records, regardless of format, are destroyed in a secure and timely manner. This document also explains that 'disposal actions within record systems are triggered automatically and relevant records flagged for review/disposal'. This suggests that automated review/destruction procedures are applied to electronic records held within SPShare in accordance with the retention schedule and similar approved policies. The updated *Records Management Procedures* (Evidence 12) explains the process by which this occurs and the rationale for record destruction, thereby helping the authority demonstrate accountability. The Team are particularly pleased to see that 'only information management staff are authorised to destroy records' as this will reduce the possibility of	One of the planned activities from the 2014 RMP (6.1 DRM system destruction documentation) was completed and reported on in 2017. The other two planned activities from the 2014 RMP remain on-going work (ie: 6.2 irrevocable deletion of records in the DRM system; and 6.3 Paper disposition recording process) but there has been further progress on planned activity 6.2. The Assessment Teams' comments in 2017 remain current for planned activity 6.3. The Scottish Parliament has made further progress in developing procedures for deletion of records in the DRM. The authority has identified a risk that some records may be retained in data backups after the record has been deleted from the system. The authority is putting measures in place to deal with this potential problem. This demonstrates continuing good practice in managing destruction procedures.	Planned activity 6.2 – Irrevocable deletion of records in DRM system. Following implementation of the Documents and communications retention policy, the IT backup regime has been adjusted to ensure that retention matches the policy. Evidence of changes will be included in support of the Scottish Parliament's revised plan in 2021. Planned activity 6.3 – Paper disposition recording process still to be scoped along with planned activity 5.4 prior to the submission of the Scottish Parliament's revised plan in 2021.	It is clear that the authority continues to make progress under this element. Planned activity 6.2, reported under previous PURs has now been concluded and satisfies the authority's ambitions. Planned activity 6.3 remains to be progressed, but the authority remains committed to bringing this to a successful conclusion. It will formally update the Keeper on progress, with supporting evidence, under its 2021 resubmission.

						unauthorised destruction of records. The Team welcome the processes in place for reviewing records held within SPShare prior to their disposal. There are also clear safeguards in place to prevent accidental deletion; the information owners of protectively marked records must be consulted prior to destruction for example, whilst retention stubs containing the original record metadata are maintained. The Assessment Team commend these arrangements but note that in the event of a future statutory assessment the Keeper will request evidence demonstrating how these procedures operate in practice. Evidence could include an example of a record having gone through the full review/destruction process within SPShare.			
7. Archiving and Transfer	G	G	G	G	Any modifications in archiving and transfer procedures due to the implementation of the Document and Records Management (DRM) project should be conveyed to the Keeper.	The update under this element shows that the arrangements agreed by the Keeper continue to be operational. The *Records Management Maturity Model and Road Map* (Evidence 01) states that provisions in this area are embedded; 'Records selected for permanent preservation and no longer required by the SPCB will be transferred to the National Records of Scotland (NRS)'. Furthermore, the updated *Records Management Procedures* (Evidence 12) declares that archives identified by the Scottish Parliament	The original Memorandum of Understanding and transfer form evidence remains robust. The Assessment Team look forward to hearing about this process in the next PUR once a digital transfer has taken place.	No change. Hardcopy Session 1 (1999 – 2003) records have been transferred to NRS. The first digital transfer (Session 1) to NRS has not yet occurred. The transfer is scheduled to be completed before submission of the Scottish Parliament's revised plan in 2021 which will contain detail of the transfer.	No immediate action required under this element. Again, the assessment team commends the authority for its commitment to bringing about progress under this element. The process for transferring hard copy records is operational, which is good, and a digital transfer is planned to take place soon. This is excellent news. The Keeper will again look forward to learning more about this under next year's formal resubmission when he will be provided with details of the transfer process in operation.

					for permanent archival preservation are 'identified in the retention schedule'. This satisfies an expectation in the Keeper's Model Plan. The Assessment Team consider this latter policy a robust document which explains to staff the definition of historical records under FOISA, and the procedures in place for the appropriate staff to follow in terms of classifying records as open or closed prior to their transfer. There is also a helpful diagram which enables records management staff to ascertain whether a record for transfer falls under one of the FOISA exemptions. The Team welcome the creation and updating of this guidance. The Team would be interested to learn of any transfers of digital records from SPShare to NRS using the XML export tool. This is considered an appropriate approach for transferring electronic records, particularly as it is noted that this tool ensures the transfer of both the record as well its place within the file plan structure and its metadata.			
8. Information Security	G	G	G	G	Any modifications in information security procedures, such as the introduction of an upgraded protective marking mechanism for electronic records, due to the implementation of the Document and Records Management	It is clear from the update that Scottish Parliament continue to demonstrate a high level of compliance under this element. This is reflected in the *Records Management Maturity Model and Road Map* (Evidence 01) which states that 'access	The planned activities from the RMP of 2014 (ie:8.1 protective marking system to be refined; and 8.2 policies and procedures to be reviewed and updated) were completed and reported in 2017. As there have been no	No change.	No immediate action required under this element. The authority clearly takes security of its information seriously and progress against planned activities has been reported under previous PURs. The Keeper will be pleased to have sight of any revised policies and

					(DRM) project should be conveyed to the Keeper. The Keeper would like to see the revised policies and procedures for information security after the full DRM project has been embedded.	restrictions and controls are applied consistently across all recordkeeping systems'. This is commendable. The receipt by the Assessment Team of an updated *Protective Marking System* document (Evidence 32) dated January 2017 and the *SPShare Security Group Changes Process* (Evidence 92) dated April 2017 are similarly welcomed as together they highlight the functionality within SPShare for providing enhanced security surrounding sensitive records. These documents outline how the protective marking system should be applied and explains the subsequent impact on how these records are stored, secured, and distributed. There is also extensive guidance for staff responsible for handling and managing these records which will enable them to correctly identify records requiring protective marking. The Assessment Team particularly commend the provision within SPShare for enabling access to records to be restricted to pre-defined groups, and agree that this suite of measures will lessen the likelihood of unauthorised editing, deletion, or sharing of sensitive records. The Assessment Team recognises the on-going initiative being undertaken by the authority and consider that this update demonstrates Scottish Parliament's continued compliance under this element.	further changes reported since 2017, there is no change to the Assessment Team's comments of 2017. The Assessment Team would welcome sight of the revised policies and procedures following implementation of the DRM system, as per the Keeper's request.		procedures when the authority resubmits formally in 2021.

	G	G	G	G		However, please note that the Keeper requested sight of all revised policies or procedures following implementation of the DRM system. If the Scottish Parliament has updated or created a new *Information Security Policy* or similar associated material, the Assessment Team would welcome having sight of these in future assessments.			
9. Data Protection	G	G	G	G	Update required on any change.	Many of the comments under Element 8 relating to the information security arrangements in place are similarly applicable under this element. The *Protective Marking System* document (Evidence 32) specifically refers to the Data Protection Act 1998 and notes that both 'information subject to data protection' and 'personal information concerning an MSP' are assigned 'Restricted' markings within SPShare. This will help ensure such records are protected from unauthorised access, edition, or deletion. The Assessment Team would particularly like to commend the proactive approach being adopted in regards to planning for the new General Data Protection Regulation (GDPR) coming into force in May 2018. This is evidenced by the *Minutes of Leadership Group Meeting held on Monday 23 January 2017* (Evidence 85) which demonstrates that senior staff within the Scottish Parliament	One of the two planned activities from the RMP of 2014 (ie: 9.2 access restrictions and controls), was completed by 2017 and reported at that time. Planned activity 9.1 (implementation of an electronic records centre) remains on-going work. It is positive to hear that a Data Protection Officer has been appointed in compliance with data protection legislation and that the Scottish Parliament has reviewed and updated all relevant processes since the previous informal assessment in 2017.	No change.	Again, the authority clearly takes its statutory data protection obligations seriously. It has made good use of the PUR process to update the assessment team on progress against planned activities. The Keeper will be pleased to have sight of updated policies and procedures under the 2021 formal submission.

					understand the new data protection obligations and the importance of engaging in preparatory work to ensure compliance. The Assessment Team would welcome updates on any new or revised policies and procedures being implemented to ensure this authority's readiness for GDPR.			
10. Business Continuity and Vital Records	G	G	G	G	Update required on any change. The Keeper requires sight of the revised Salvage Plan once this is available.	The *Records Management Maturity Model and Road Map* (Evidence 01) provides an update on the work being done in this area. Whilst it remains clear that sufficient arrangements surrounding business continuity and vital records are in place, Scottish Parliament have identified procedures for the identification and safeguarding of vital records at a 'Defined' rather than 'Embedded' level of maturity. A similar assessment is made as regards the creation and maintenance of a central register of vital records. There appears to be an objective of moving towards a situation in which vital records are regularly identified and checked to ensure that the information they contain remains intact and usable. The Team welcome this as an approach likely to improve provision under this element. The Team therefore look forward to hearing of progress being made in this regard and they also note that the Keeper has requested sight of the Heritage Salvage Plan	In the context that Business Continuity Plans are in place and reviewed annually, the fact that none of the planned improvements have been scoped or started is less of a concern than it might otherwise be. However, the Assessment Team would encourage the Scottish Parliament to give greater attention to these improvements to ensure long term sustainability and continuity. The Heritage Salvage Plan applies to the art, paper and object collections and to temporary exhibitions in the Parliament and the Keeper would like sight of this once it is available.	No change.	It is commendable that the authority continues to critically assess and improve arrangements that were already robust enough to gain a green RAG status. The previously mentioned planned improvements remain to be reported on and the Heritage Salvage Plan, if it is available, remains to be provided, but these may be addressed under the formal submission to take place next year.

					once it becomes available.			
11. Audit Trail	A	A	A	A	The Scottish Parliament does not yet have a fully realised document tracking facility for all records, particularly in the case of electronic records which have not yet been encompassed by the new EDRM system. The Keeper would like to receive updates on the progress being achieved to rectify this through the authority's Document and Records Management (DRM) project. The Keeper agrees this element of The Scottish Parliament's RMP on Improvement Model terms. This means that he is convinced of the authority's commitment to implement an audit trail alongside the EDRM fully over time, but would request that he is updated as this project progresses.	A principal area for improvement under this element identified in the Keeper's Assessment was the tracking of electronic records. The update makes clear that the authority recognised this gap in provision and undertook a project to develop and roll-out an EDRM solution (SPShare with a bolt-on). The *Records Management Plan* and *Documents and Records Management (DRM) Project Closure Report* (Evidence 91) indicate that this solution is now fully embedded and that SPShare provides the central repository for all electronic records. This project is commended by the Assessment Team as an EDRM solution is widely acknowledged to provide the most effective audit trail functionality, particularly as many features such as the capturing of metadata is automated. The Team are also assured that naming conventions and version control procedures continue to be applied to electronic records stored within SPShare. This is evidenced for example by information in the updated *Records Management Procedures* (Evidence 12) document. The Assessment Team consider that the Scottish Parliament have made extensive progress under this element through the rolling-out of the DRM	Planned activity 11.1 (electronic records trail) was completed and reported in 2017. Planned activity 11.2 (investigate use of external items feature in DRM for control of paper records) is yet to be scoped and implemented. As there have been no further changes reported since 2017, there is no change to the Assessment Team's comments of 2017.	No change. Examples of specific audit trails undertaken on records held within SPShare will be submitted with the Scottish Parliament's revised plan in 2021.	Again, the authority is to be applauded for pursuing and implementing significant improvement under this element. The Keeper will be pleased, under next year's formal submission, to have sight of the authority's evidence in support of the successful completion of planned activity 11.1. He will similarly be pleased to learn about the progress against planned activity 11.2. With evidence of the authority's operational audit trail mechanism, and a robust update on progress under planned activity 11.2, the Keeper may revisit the RAG status of this element.

	<td colspan="4" style="background:orange"></td>					system (SPShare). It is likely that should the Keeper be provided with examples of specific audit trails undertaken on records held within SPShare in any future statutory assessment, this element will be assigned an improved RAG marking. The Team would also like to receive updates in future submissions concerning the proposals to track paper records using SPShare. This is a planned activity noted in the *Records Management Plan*.			
12. Competency Framework	G	G	G	G	Update required on any change.	Due to the implementation of the SPShare solution for managing this authority's electronic records, and the importance of this system for ensuring compliance under a number of elements, the Scottish Parliament should be applauded for the creation of extensive and comprehensive staff training and related material concerning this development. Staff undertake training on use of SPShare where activities such as creating and storing records, navigating the system, and protectively marking records is explained. This is demonstrated by submission of the *SPShare Face-to-Face Training Session Plan* (Evidence 89) and the screenshots from the *Introduction to SPShare* (Evidence 88). It is also clear from this update that staff have access to useful support and advice regarding	Planned activity 12.1 (staff training) was implemented and reported in 2017. Planned activity 12.2 (performance management) was new to the 2016 iteration of the RMP. As yet updated evidence has not been received for 12.2. As there have been no further changes reported since 2017, there is no change to the Assessment Team's comments of 2017.	No change.	No immediate action required under this element. The Keeper will again look forward to an update, particularly with regard to planned activity 12.2 – information manager and professional development performance management templates - under next year's formal resubmission.

	G	G	G	G		on-going use of SPShare. The Assessment Team commend the creation of documents such as *SPShare Overview* (Evidence 87) and training videos "InfoPods" (Evidence 86) which offer wide-ranging information to staff on how to undertake tasks within SPShare and how to handle common difficulties/issues. The Team believe that the creation of these resources will greatly increase staff compliance with the DRM system and therefore ensure that records are being created and managed appropriately.			
13. Assessment and Review	G	G	G	G	Update required on any change. The Keeper commends the internal reviews and self-assessment programmes and would welcome updates on these initiatives.	The submission of an updated *Records Management Plan* accompanied by revised or newly created policies (such as the revised *Records Management Policy* dated January 2017) is a clear indication of this authority's commitment to undertake scheduled reviews of their records management arrangements. The Assessment Team commend this commitment and consider that such periodic reviews and updating of policies will ensure that records management provisions remain robust and fit for purpose. This is particularly important in regards to upcoming legislation such as the General Data Protection Regulation (GDPR).	The Scottish Parliament clearly continues to keep its Records Management Plan under review, as required by the Public Records (Scotland) Act s.5 (1). It is best practice to ensure that senior management are aware of and involved in reviews and the Assessment Team welcome the commitment to proper arrangements shown by this work.	No change.	The Scottish Parliament's commitment to routinely reviewing the policies and procedures that underpin its plan is without question and has been since it achieved the Keeper's agreement. It clearly continues to keep its Records Management Plan under review

	<td style="background:green"></td>	<td style="background:green"></td>	<td style="background:green"></td>	<td style="background:green"></td>		There is also a recognition by the Scottish Parliament that further work is required to bring all aspects into full compliance with the Keeper's expectations. The use of the *Records Management Maturity Model and Road Map* (Evidence 01) is particularly commended as it provides a clear overview of the level of provision within specific areas and thus helps the authority identify where further work or developments are required. This is also reflected in the 'Planned Activity' sections of the Plan itself. The Assessment Team recognises the on-going initiative being undertaken by the authority and consider that this update demonstrates Scottish Parliament's continued compliance under this element. They would be happy to receive, and provide feedback on, updates in future assessments.		
14. Shared Information	**A**	**A**	**A**	**G**	The *Maturity Model* indicates that certain protocols for data sharing remain to be put in place and that a project is underway to impose management controls when sharing records with third parties. The Keeper requests that he is kept up-to-date with these projects. The Keeper agrees this element of The Scottish Parliament's RMP on Improvement Model terms. This means that he is convinced of the authority's commitment to develop firm records	The *Records Management Plan* notes that the planned activities regarding sharing records and establishing management controls are still to be implemented. The *Records Management Maturity Model and Road Map* (Evidence 01) similarly notes that the level of maturity regarding the creation of agreed protocols when sharing data with third parties is at an 'Aware' level and that further work is required in this area. The Keeper's	The planned activities for this element have generally not yet been undertaken. There is a policy in place covering data exchanges with third parties, so it is clear that a certain amount of data sharing does take place but this appears to be fairly limited and it is understandable that this will therefore be a lower priority than other records management work. The Assessment Team would encourage the Scottish	Planned activity 14.1 – measures have been put in place to define specific arrangements for information sharing. The revised Protective marking system details arrangements for sharing information that is and isn't protectively marked. Planned activity 14.2 – Office 365 and SharePoint Online functionality has been adopted to manage the sharing of protectively marked information with external bodies. Management controls have also been implemented for the sharing of information not protectively marked. The revised Protective marking system, Sharing agreement and details of the SharePoint Online sharing solution will be submitted with the Scottish Parliament's revised plan in 2021.	It is encouraging to learn under this PUR that the authority has now addressed outstanding commitments under this element. Planned activities 14.1 and 2 have been completed. The authority will take the opportunity under next year's formal submission of a revised RMP to provide the Keeper with evidence of the work undertaken. With robust evidence of compliance the Keeper will revisit the RAG status of this element .

					governance procedures for data sharing over time, but would request that he is updated as this project progresses.	original assessment therefore remains, and he asks that he is updated should developments take place under this element.	Parliament to quantify the data that requires to be shared and identify any information security issues before the next iteration of the RMP, in order to establish whether a greater priority exists for this work. The Assessment Team look forward to hearing about this in a future PUR.		

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 25 August 2020. The progress update was submitted by Gordon Hobbs Information Manager.

The progress update submission makes it clear that it is a submission for Scottish Parliament, Scottish Parliamentary Corporate Body and Scottish Commission for Public Audit.
The Assessment Team has reviewed Scottish Parliament, the Scottish Parliamentary Corporate Body and the Scottish Commission for Public Audit's Progress Update submission and agrees that the 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

Scottish Parliament, the Scottish Parliamentary Corporate Body and the Scottish Commission for Public Audit 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.
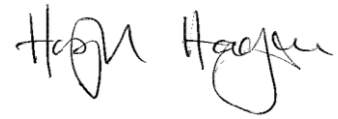
8. The Public Records (Scotland) Act Assessment Team's Evaluation

It is commendable that the authority continues to implement the planned activities identified under the original agreed RMP and which have been referred to under previous PUR submissions. This demonstrates that the original RMP and the updated iteration of the RMP received in 2017 were robust. The PUR demonstrates clear progress under a number of elements, including retention, destruction, audit trail and shared information. This continuing commitment to making proper arrangements for the records of the Scottish Parliament. the Scottish Parliamentary Corporate Body and the Scottish Commission for Public Audit is highly commendable and exemplary in the sector.

Based on the progress update assessment the Assessment Team considers that Scottish Parliament, the Scottish Parliamentary Corporate Body and the Scottish Commission for Public Audit 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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Hugh Hagan
Head of Public Records Act Implementation