# The Public Records (Scotland) Act 2011

**Scottish Government (Part of 'Scottish Ministers')**
**Disclosure Scotland (Part of 'Scottish Ministers')**
**Transport Scotland (Part of 'Scottish Ministers')**
**Student Awards Agency for Scotland (Part of 'Scottish Ministers')**
**Accountant in Bankruptcy (Part of 'Scottish Ministers')**
**Scottish Agricultural Wages Board**
**Chief Dental Officer of the Scottish Administration**
**Chief Medical Officer of the Scottish Administration**
**Her Majesty's Inspector of Anatomy for Scotland**
**Her Majesty's Chief Inspector of Prisons for Scotland**
**Independent Prison Monitors**
**Prison monitoring co-ordinators**
**Her Majesty's Inspectorate of Constabulary in Scotland**
**Her Majesty's Fire Service Inspectorate for Scotland**
**Safeguarders' Panel**
**Drinking Water Quality Regulator for Scotland**
**Mobility and Access Committee for Scotland**

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

**31 October 2019**

**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 the scheduled authorities listed below. The outcome of the assessment and relevant feedback can be found under sections 6 – 8.

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Safeguarders Panel
Drinking Water Quality Regulator for Scotland
Mobility and Access Committee for Scotland

The Parole Board for Scotland withdrew from this Records Management Plan in May 2019.

4. Authority Background

The seventeen scheduled authorities listed in section 3 above share a common records management plan (RMP). This arrangement is allowed for in the Act under section 1(9). All seventeen authorities use the records management provisions of Scottish Government and have agreed to implement the RMP fully in order to meet their obligations under the Public Records (Scotland) Act 2011 (PRSA). Fourteen were included when the Scottish Government RMP was originally agreed. In December

2016, the Keeper further agreed that the Mobility and Access Committee for Scotland (MACS), who are separately scheduled under the Act, should have a common records management plan (RMP) with the Scottish Government whose records management provision MACS has adopted.  Similar arrangements were agreed for the Safeguarders Panel in June 2017 and the Drinking Water Quality Regulator for Scotland in August 2017. In October 2017, the Keeper also agreed that the Independent Prison Monitors and Prison Monitoring Co-Ordinators, who are both separately scheduled under the Act would use a common RMP with HM Inspectorate of Prisons for Scotland which is included in the RMP for Scottish Government.  In 2018 the Parole Board for Scotland which was one of the original fourteen authorities, indicated that they would prefer to submit a separate RMP , which the Keeper agreed in 2019 and accordingly they are no longer included in this RMP.

The **Scottish Government** (Part of the scheduled public authority 'Scottish Ministers') is the devolved government for Scotland which is responsible for most of the issues of day-to-day concern to the people of Scotland, including health, education, justice, rural affairs and transport.

**Disclosure Scotland** (Part of 'Scottish Ministers') is an Executive Agency of the Scottish Government which provides criminal records checks under Part V of the Police Act 1997 and the Protection of Vulnerable Groups (Scotland) Act 2007.

**Transport Scotland** (Part of 'Scottish Ministers') is an Executive Agency of the Scottish Government which is responsible for advising Scottish Government on strategy and policy options for transport in Scotland and for increasing sustainable economic growth through the development of national transport projects.

**Student Awards Agency for Scotland** (Part of 'Scottish Ministers') is an Executive Agency of the Scottish Government giving financial support to all eligible students doing a course of higher education in the UK.

**Accountant in Bankruptcy** (Part of 'Scottish Ministers')  is an Executive Agency of the Scottish Government responsible for administering the process of personal bankruptcy and recording corporate insolvencies in Scotland.

The **Scottish Agricultural Wages Board** (SAWB) is an executive non-departmental public body set up under the Agricultural Wages (Scotland) Act 1949. The SAWB exists to set minimum rates of pay and other conditions of service for agricultural workers in Scotland.

The **Chief Dental Officer** (CDO) is the Scottish Government's principal dental adviser, and as such has direct access to ministers. The post has direct involvement in the development of health policy in Scotland, including, health promotion and health protection. The CDO has lead responsibility for issues such as clinical effectiveness, quality assurance, accreditation and research.

The **Chief Medical Officer** (CMO) is the Scottish Government's principal medical adviser and is also Head of the Scottish Medical Civil Service. The post covers every aspect of health in Scotland.

Her Majesty's **Inspector of Anatomy** for Scotland inspects premises where bodies for anatomical examination and anatomical specimens are kept. He also inspects record keeping and disposal practices.

Her Majesty's **Chief Inspector of Prisons for Scotland** is required to inspect the 16 prison establishments throughout Scotland in order to examine the treatment of, and the conditions for, prisoners. The Chief Inspector also undertakes inspections of legalised police cells. These are cells in a number of police stations, usually distant from a prison, where prisoners may legally be held for short periods while awaiting trial or immediately after conviction. The Chief Inspector also has responsibility for the inspection of the treatment of and conditions for prisoners under escort.

**Independent Prison Monitors appointed under section 7B(2)(a) of the Prisons (Scotland) Act 1989** are volunteers who provide an independent viewpoint on the humane treatment and conditions for prisoners in all prisons across Scotland and conduct investigations either as a result of a prisoner raising an issue or from observations that are made during prison visits. Monitors report formally on their findings.

**Prison monitoring co-ordinators appointed under section 7A (2) of the Prisons (Scotland) Act 1989** co-ordinate the work of Independent Prison Monitors.

Her Majesty's **Inspectorate of Constabulary in Scotland** (HMICS) provides independent scrutiny of both Police Scotland and the Scottish Police Authority. Its role was reaffirmed by the Police and Fire Reform (Scotland) Act 2012, which gave HMICS wide ranging powers to look into the "state, effectiveness and efficiency" of both Police Scotland and the Scottish Police Authority, including forensic services.

Her Majesty's **Fire Service Inspectorate for Scotland** or HM Fire Service Inspectorate is an autonomous agency of the Scottish Government. Its function is to provide independent, risk based and proportionate professional inspection of the Scottish Fire and

Rescue Service it is also known simply as HMFSI. It is not a fire fighting body. The HMFSI can however enquire into any matter concerning the operation of a fire and rescue service.

**Safeguarders** Panel is responsible for recruitment and selection, training, managing appointments, complaints and monitoring performance of safeguarders across Scotland. The statutory responsibility for these functions lies with the Safeguarders Panel which is administered by the Children and Families Directorate. However Scottish Government currently contracts management of the national Safeguarders Panel to Children 1st

The **Drinking Water Quality Regulator for Scotland** is responsible for monitoring water quality and enforcing the regulations on behalf of Scottish Ministers. Technical and logistical support is provided by the Drinking Water Quality Division of the Scottish Government.

The **Mobility and Access Committee for Scotland** (MACS) is an advisory non departmental public body. The Convener and Members are appointed by the Minister for Transport and the Islands. The role of MACS is set out in the Act as being to consider matters about the needs of disabled persons in connection with transport that the committee think are appropriate and to advise the Scottish Ministers about those matters that the committee think are appropriate.

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):** Scottish Government; Disclosure Scotland; Transport Scotland; Student Awards Agency for Scotland; Accountant in Bankruptcy; Scottish Agricultural Wages Board; Chief Dental Officer of the Scottish Administration; Chief Medical Officer of the Scottish Administration; HM Inspector of Anatomy for Scotland; HM Chief Inspector of Prisons; Independent Prison Monitors; Prison Monitoring Co-ordinators; HM Inspectorate of Constabulary in Scotland; HM Fire Service Inspectorate for Scotland; Safeguarders' Panel; Drinking Water Quality Regulator for Scotland; Mobility and Access Committee for Scotland

| Element | Status of elements under agreed Plan, August 2015 | Status of evidence under agreed Plan, August 2015 | Progress assess-ment status, October 2018 | Progress assess-ment status, October 2019 | Keeper's Report Comments on Authority's Plan, August 2015 | Self-assessment Update October 2017 | Self-assessment Update October 2018 | Progress Review Comment, October 2018 | Self-assessment Update as submitted by the Authority since October 2018 | Progress Review Comment, October 2019 |
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| 1. Senior Officer | G | G | G | G | Update required on any change | No change | No change | No immediate action required. Update required on any future change. | Lesley Fraser is now the Director General for Organisational Development and Operations and as such takes on the Senior Information Risk Owner for the Scottish Government. You should also be aware that Parole Board for Scotland are currently working with NRS colleagues to develop their own records management plan, as such they will no longer be covered by the SG records management plan. | Thank you for this update. This is a statutory element of the RMP. If this were a statutory submission, confirmation of this from the individual would be required. The withdrawal of the Parole Board for Scotland from the SG records management plan in May 2019 is noted, with thanks. |
| 2. Records Manager | G | G | G | G | Update required on any change | Craig Sclater who reports to Maxine Reid, Head of Knowledge and Information Management | No change other than Craig Sclater is now the Corporate Records Manager. | This update noted with thanks. | No change but for information Gail Henderson has been appointed as Deputy Corporate Records Manager. | This update is noted with thanks. |
| 3. Policy | G | G | G | G | Update required on any change. The Keeper would like sight of any revisions of the authority's *Records Management Policy* following the regular reviews outlined in the RMP. | Change in responsible team name from Knowledge, Information and Records Management (KIRM) Unit to Knowledge and Information Management (KIM) Branch. Government security classifications have changed to Official, Official Sensitive, Secret and Top Secret. | No change | No immediate action required. Update required on any future change. | No change but as previously advised we have made a decision to digitise our Legacy Paper records in line with our "digital first" policy. | This update is noted with thanks. |

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| 4. Business Classification | **G** | **G** | **G** | **G** | Update required on any change. | No 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. |
| 5. Retention Schedule | **G** | **G** | **G** | **G** | Update required on any change. | There have been 3 new file types created as follows:<br>• Draft research – close after 1 year, destroy 3 years after closure;<br>• Archives casework – close after 5 years, archive 10 years after closure;<br>• Statistics – close after 5 years, archive 10 years after closure | No change | No immediate action required. Update required on any future change. | The following new file types have been created at the request of SG business areas:<br><br>• Extradition Casework – close after 5 years, review 10 years after closure;<br>• Legal Hold – close after 5 years, archive 15 years after closure;<br>• Firearms Casework – close after 5 years, archive 10 years after closure<br><br>The following file types have had their retention schedules amended following requests from SG business areas (these changes were made to meet revised business requirements for how long material required to be retained):<br><br>• Relocations Casework – close after 5 years, destroy 13 years after closure (was previously destroy 10 years after closure);<br>• Litigation Casework – close after 5 years, destroy 15 years after closure (was previously destroy 10 years after closure) | The addition of new file types demonstrates that staff are aware of and actively use the retention schedules, and that procedures are in place to keep the retention schedules update in line with business requirements. Although these are small changes, they are a positive and welcome indication of on-going work in this area. |
| 6. Destruction Arrangements | **G** | **G** | **G** | **G** | Update required on any change. The authority is aware of legacy corporate records held electronically which do | No change. Legacy paper files which NRS have selected for permanent preservation continue to be transferred | No change other than we have been able to re-commence destroying our legacy paper files in line with | The Scottish Child Abuse Inquiry did not intend that there should be a complete halt to | No change other than we have suspended the destruction of all eRDM files as a result of internal investigations which are | From time to time legal or business requirements can necessitate a suspension of routine destructions. The backlog resulting from |

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| | | | | | not form part of the ERDM and has therefore established a project to manage and dispose of these records. The Keeper must be kept up-to-date with the progress of this project. | to NRS once our review team have assessed whether any exemption should be applied to their release to the public. We have been under a moratorium in regards to the destruction of information as a result of the Scottish Child Abuse Inquiry so have not been able to destroy any files for a period of time. However, we have since had confirmation from the Permanent Secretary that she is content to agree a partial lift of the moratorium in accordance to what has been agreed with the Scottish Government Scottish Child Abuse Inquiry Response Unit. | their schedules for those categories which are of no interest to the Scottish Child Abuse Inquiry. We are in discussions with Objective to have a bulk import tool developed which will allow us to provide our users with the ability to import documents into eRDM in bulk from shared drives. Once this has been developed we will commence a big push with our business areas to have them identify information currently held in shared drives which should be part of the corporate record and then work with them to have this information transferred into eRDM. This will ensure that our legacy information is managed appropriately. | routine disposals of records with no relevance to the Inquiry and it is good to hear that the backlog of records placed under the initial moratorium is now being dealt with. Managing the quantity of backlog destructions puts considerable strain on existing staff and resources which will have an impact on other areas of work. The development of a bulk import tool will significantly assist with the management of electronic records. | in progress. This is in addition to the ongoing moratorium related to the Scottish Child Abuse Inquiry. We now have a bulk import tool available for use and plan on using this to assist with the transfer of information from shared drives into eRDM in due course (this should hopefully commence in 2020). | this has to be managed with due attention to any conflicts with other legal requirements and may require additional resources once routine destructions can re-commence. If this were a statutory submission, it would be advisable to ensure that there is evidence of how this type of issue is managed. The development of the bulk import tool is a useful and positive step forward. This will meet user needs more effectively than present arrangements and should therefore encourage fuller adoption of the EDRMS across business areas. |
| 7. Archiving and Transfer | G | G | G | G | Update required on any change | No change. We need to agree (with NRS) an electronic archiving process for the transfer of Scottish Government records to NRS. We have made mention of this to Bruno Longmore at a recent meeting and agreed that we will revisit this topic shortly. | No change other than we have had further meetings with NRS colleagues to discuss the electronic archiving process. We are hopeful that between ourselves and NRS we will be able to progress this over the coming months. | Digital preservation is now an essential part of ensuring the long term preservation of records of enduring value. This collaborative work between NRS and Scottish Government is an important step forward for the wider public sector. | We are currently in discussions with NRS colleagues regarding the transfer of electronic material which is due to go to archive at the end of this year. We will continue to work with NRS colleagues to ensure the relevant records are transferred. | The steady progress in developing robust transfer procedures for electronic records is a positive approach to this undoubtedly complex area. This continues to be a challenging area. This on-going work demonstrates long-term commitment to ensuring that authentic, and reliable records are preserved appropriately. |
| 8. Information Security | G | G | G | G | Update required on any change | No 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. |

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| 9. Data Protection | G | G | G | G | Update required on any change | No change | Aside from extra considerations as to how we manage the personal information we hold as a result of the introduction of GDPR there has been no change. As our information is managed at file (rather than document) level we have to put the onus on our business areas to determine whether personal information that they hold needs to be destroyed in advance of when the file the information is held in is to be destroyed. Each of our business areas holds an Information Asset Register which allows them to track the information they hold and how long it should be retained for. Our Data Protection and Information Asset Team have provided extensive training across the organisation on GDPR. Additionally the Records Manager has attended a SG Data Protection Practitioner Network meeting to highlight how information is managed in eRDM (i.e. at file level) and the onus on business areas to ensure that personal information is destroyed at the appropriate time in line with commitments which they have given. | The small risk that a few records may be retained slightly beyond the retention period stated to data subjects has been mitigated by extensive training. The Assessment Team are satisfied that there are robust procedures in place. | No change. | No immediate action required. Update required on any future change. |
| 10. Business Continuity and Vital Records | G | G | G | G | Update required on any change. The Keeper would be pleased to hear updates concerning the planned annual review of | No change. The Scottish Government Business Continuity Plan continues to be reviewed regularly. | The Scottish Government Business Continuity Plan continues to be reviewed regularly. | The digitisation of legacy paper records is a business decision for Scottish | We moved all of our paper records out of Leith File Store prior to the end of March 2019. The records are currently held | This update on the digitisation of semi-current records is noted with thanks. It is to be expected that this substantial task |

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| | | | | | the *Business Continuity Plan*. | | As a result of the Digital First agenda we are currently undergoing a project to digitise our legacy paper records. We have established a process that complies with BS 10008 Evidential Weight and Legal Admissibility of Electronic Information. NRS colleagues are aware of the project and the need for us to protect our legacy information which has been held in our File Store in Leith which we are required to vacate early in 2019. | Government, based on a cost-benefit analysis of storage capacity, access and security arrangements for paper and digital records. The digitisation project has been appropriately considered with due regard to standards for evidential and business use of records which are not of enduring value. | in a secure off-site location and are being recalled in batches on a regular basis in order that we can progress with our digitisation project. The project continues with particular focus given towards records of potential interest to the Scottish Child Abuse and Blood Inquiries. | will take some time to complete. |
| 11. Audit Trail | G | G | G | G | Update required on any change | No change | No change. | No immediate action required. Update required on any future change. | We have created an Access database to maintain a record of our Legacy Paper files. This was put into place to provide a safer environment for this information as we were encountering issues with the updating of the spreadsheets which were held in eRDM. | This appears to be a simple and pragmatic response to an identified issue, making use of what software is available. In the longer term, with such a complex organisation, there may be a requirement for migrating this information into an alternative platform. The Assessment Team would be interested to hear whether the format of this solution can be shared with other public authorities. |
| 12. Competency Framework | G | G | G | G | The Keeper commends efforts to identify relevant training for the officer identified in Element 2 so that they can work towards attaining a professional qualification. The Keeper would welcome updates on this.

The Keeper would like to be informed if a records management module is developed for staff across the authority. | The Head of Knowledge and Information Management is intending on creating Skills Framework for the Information Age (SFIA) style job descriptions as part of the 2017/18 objectives for each individual in the Branch. This is in view to aligning these roles to a more formal professional development framework. | The Head of Knowledge and Information Management is awaiting the sign off of the Skills Framework for the Information Age (SFIA) style job descriptions which have been developed for members of the branch.

We continue to look for suitable training opportunities for | The on-going commitment to relevant and appropriate training and professional development is evident and Scottish Government is to be commended for this support of its professional staff. | The Skills Framework for the Information Age (SFIA) style job descriptions are still not signed off as yet. However, two members of the Records Management Team have completed Records Management 1 and 2 training courses delivered by PDP training with another two members of the team undertaking these courses at the end of September 2019. The | The length of time required for signing off agreed job descriptions is certainly disappointing but understandable in a large organisation. However, it is good that this has not prevented the staff from developing their skills and competencies nor delayed accessing appropriate training. It is clear that the authority continues to provide support to staff for professional development. |

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| | | | | | | Although we are not looking at rolling out a records management module to all staff at the current time we are looking at what suitable training opportunities are available for records management staff and will be encouraging all members of the team to participate in these. | members of the Branch to undertake. The Corporate Records Manager and a member of the team attended the IRMS Conference in Brighton in May to enable them to expand their knowledge and records management contacts.

As part of the eRDM upgrade project (which will take place at the end of this year) we will be looking to not only roll out training modules on the updated version of eRDM but also specific training on Information Management Principles to hopefully develop the knowledge of all staff across the organisation. We are additionally planning on creating a new role titled the Senior Information Management Support Officer in each Division in order to provide support to the Divisional Information Management Support Officers and to strengthen the approach on records management in each business area. | The requirement to develop training for all staff each time there is a change or new initiative in records management is clearly well understood and planned as part of the roll out of these changes. Scottish Government is to be commended for its proactive, planned approach to such changes. | team continue to look for other training opportunities which will increase their records management knowledge.

Arrangements are in place to provide specific training on Information Management Principles to all Scottish Government staff as part of the suite of training products which will be delivered as part of the eRDM upgrade. There is still an intention to roll out the Senior Information Management Support Officer role to strengthen the approach on records management in each business area. This will hopefully take place around the same time as the eRDM upgrade roll out. | |
| 13. Assessment and Review | **G** | **G** | **G** | **G** | | The Keeper commends plans to review annually or on an even more regular basis the RMP and the policies that support it. Updates on these reviews would be welcomed by the Keeper. | Our Records Management Plan has not been fully reviewed since it was agreed. We will be reviewing it in full imminently and are aware that certain minor revisions need to be made to it (such as Records Manager | A full review of our records management plan was carried out at the end of last year. Minor changes were made to the plan in order to reflect the up to date position and this document was | This update is noted with thanks. | We continue to review our records management plan documentation. Updates have been made to our file type guidance documentation to reflect the new file types which have been created and those where we have amended the records | It is clear from this PUR that the RMP is being regularly reviewed, updated and actioned. This ensures that the RMP is fit for purpose and is to be commended. |

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| | | | | | | contact, the change in our Branch name and "new" organisations that are now covered by our Records Management Plan – NRS are already aware of who these are) though these will not affect the context of the document. | published in November 2017. | | schedule relating to a file type (see 5. Retention Schedule). We are currently making minor changes to our Records Management Policy document in order to strengthen certain messages within it and to highlight our 'digital first' policy. | |
| 14. Shared Information | G | G | G | G | Update required on any change | No change | The only change to report here is that we have introduced a tool called eRDM Connect which enables business areas to share information with external organisations. The tool allows documents to be secure at rest and in transit and has been successfully deployed in a number of business areas already. It became available as a corporate resource in August 2018. | The Assessment Team have assurances that this new tool for data sharing complies with existing data sharing protocols. It has been used successfully by the Assessment Team, as well as by other business areas. | eRDM Connect has proven extremely popular with a number of business areas who have recognised the benefit it provides to their working practices, not to mention the level of security it delivers. It has proven to be a vital resource not only in sharing information with external organisations but also in sharing documents with other organisations who have their own file plan and use the SG instance of eRDM.<br><br>No changes to report. | Providing a secure environment for shared work is a positive benefit for all partners in the range of projects and initiatives that Scottish Government staff are involved with. This has assisted the PRSA Assessment Team in the collaborative work which informed the Keeper's new Model Records Management Plan and will be used again for the development of supporting guidance. The continuing use of this tool is welcome. |

<u>Version</u>

The progress update submission which has been assessed is the one received by the Assessment Team on 22 August 2019. The author of the progress update submission is Craig Sclater, Corporate Records Manager.

The progress update submission makes it clear that it is a submission for the following scheduled authorities:

Scottish Government (Part of 'Scottish Ministers')
Disclosure Scotland (Part of 'Scottish Ministers')
Transport Scotland (Part of 'Scottish Ministers')
Student Awards Agency for Scotland (Part of 'Scottish Ministers')
Accountant in Bankruptcy (Part of 'Scottish Ministers')
Scottish Agricultural Wages Board
Chief Dental Officer of the Scottish Administration
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Her Majesty's Chief Inspector of Prisons for Scotland
Independent Prison Monitors
Prison monitoring co-ordinators
Her Majesty's Inspectorate of Constabulary in Scotland
Her Majesty's Fire Service Inspectorate for Scotland
Safeguarders Panel
Drinking Water Quality Regulator for Scotland
Mobility and Access Committee for Scotland

7. PRSA Assessment Team's Summary

The Assessment Team has reviewed the Progress Update Review (PUR) submission for Scottish Government and the other scheduled authorities as listed and agrees that the proper record management arrangements outlined by the fourteen elements in the authority's plan continue to be properly considered. The Assessment Team commends the efforts of these authorities to keep their Records Management Plan under review.

General Comments

It is clear that Scottish Government continues to take its records management obligations seriously and is working to maintain all elements in full compliance with the Public Records (Scotland) Act 2011 (the Act).   It is clear that the current Records Management Plan is being implemented throughout this very large organisation and that issues that arise are being acknowledged and addressed appropriately.  The staff are being supported to undertake professional development and new ways of working are developed in response to changes led by legal or business requirements.

Section 5(6) of the Public Records (Scotland) Act 2011 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 the plan under section (5)(6) of the Act.  It is likely that if this were a formal re-submission that the RAG status of all fourteen elements would remain Green.  The evidence required under a statutory submission would need to address some of the issues discussed in this PUR, in particular the developing backlog of delayed destructions and its related risks.

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

8. PRSA Assessment Team's Evaluation

Based on the progress update assessment the Assessment Team considers that **Scottish Government** continue to take their statutory obligations seriously and are working to maintain all the elements of their records management arrangements in 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

**Elspeth Reid**
Public Records Officer