The Public Records (Scotland) Act 2011

National Library of Scotland

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

3rd April 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 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 | | 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 |

			closing a gap in provision. They will request that they are updated as work on this element progresses.			the Keeper on this basis.

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

Element	Status of elements under agreed Plan 17JAN17	Status of evidence under agreed Plan 17JAN17	Progress assessment status 09JAN19	Progress assessment status 03APR20	Keeper's Report Comments on Authority's Plan 17JAN17	Self-assessment Update 28SEP18	Progress Review Comment 09JAN19	Self-assessment Update as submitted by the Authority since 09JAN19	Progress Review Comment 03APR20
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	No change	No immediate action required. Update required on any future change.
4. Business Classification	A	G	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 likely to provide a stronger business tool than having these as separate documents… The Keeper agrees that,	Since the plan was agreed, implementation of the Business Classification and Retention Scheme (BCRS) has progressed. The scheme is available to all staff with accompanying guidance about how to use it to classify records and establish retention periods. There is still much work to be done to incorporate classification and retention rules from the scheme into the management of current records. Little progress with this for electronic records has been feasible to date, as the Library has been in the process of moving various aspects of electronic information management to a new platform (Office 365). Our email system was	The BCRS has been provided and this appears to be fairly comprehensive with appropriate retention periods and identification of records of enduring value, as would be expected from a national collection. This update shows steady progress in response to practical business requirements. The implementation of this scheme will inevitably take some time and staff will require support to adjust to managing the paper records across the business in compliance with the BCRS. The use of the BCRS for electronic records as well as paper	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 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	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 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

Element									
	(amber)	(green)	(amber)	(amber)	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.**	migrated in July 2018 and our other electronic records (eg managed through Sharepoint and shared drives) will be the next focus. Our intention is to build rules into the new platform, based on the BCRS, which ensure all emails and electronic records are required to be classified in accordance with the BCRS. We will establish a platform for the management and storage of digital records in the newer and more efficient version of SharePoint which was acquired as part of the Office 365 package. The structure of this records system in SharePoint will mirror the BCRS. An updated BCRS was prepared in summer 2018 and is currently with the senior management team for formal approval, having obtained initial approval from the senior management steering group on 04 September. The updated scheme is provided with this report, together with a summary of the changes.	records will help staff further in managing and retrieving records in the same way regardless of format. It is important that significant changes to electronic systems are properly planned and it is sensible to build retention rules and classification into the new system so that existing records can be matched into the BCRS as they are transferred. The Assessment Team look forward to hearing more about these developments in future PURs.	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.	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.
5. Retention Schedule	**A**	**G**	**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**	Familiarisation with the BCRS has increased since the RMP was agreed. Work has been carried out to review, destroy or archive a large number of (primarily paper) records which had been retained by the Library for unnecessarily long periods of time. A substantial number of records in the Library's Archive have been disposed of in accordance with the BCRS since the RMP	It is positive to hear that the implementation of the BCRS is enabling improvements in the retention of business records and that this will continue as the electronic records are included.	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	**See element 4 above.** The Assessment Team commends the decision to use the SharePoint migration as an opportunity to data cleanse.

					in place to close that gap. **The Keeper's agreement is conditional on him receiving updates as the business classification /retention project progresses.**	was agreed. Departments across the Library have been given guidance about using the BCRS to manage records stored locally. This process of implementation is ongoing and specific training in the BCRS will be given in the coming months as a new Information Officer post is filled and staff are given guidance on managing their electronic records, notably using the services on the Office 365 platform.		current intranet in accordance with the BCRS. Further guidance on managing electronic records within the new platform will be provided to staff as it is rolled out.	
6. Destruction Arrangements	A	G	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**	A review of our storage and destruction arrangements for electronic records is ongoing. Current work in this area has focussed on the destruction of content from our email archive. At present our emails are backed up in their entirety from 2004. A plan has been prepared for ending this practice and disposing of old emails over a period of time. This plan has been approved in principle by the senior management team and will be timetabled and resourced over coming months. As we are still implementing the BCRS for electronic records, the destruction of electronic records is still to be addressed. No change to the third party contract for the destruction of physical records. Facilities for destruction of confidential physical records are being updated, with less secure cardboard bins	The review of storage and destruction arrangements is on target. It is recognised that this work is resource-intensive but there will be a significant benefit to the efficiency of the NLS in providing its core functions once emails and other electronic records are managed in line with the BCRS. It is positive to see that this steady and sensible planned approach is being implemented. It is also good practice to ensure that the secure destruction of confidential papers records is reviewed and updated to meet business needs.	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 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	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. This element remains at amber during the SharePoint migration/roll-out. The Assement Team notes the

| | | | | | National Library of Scotland have correctly identified this gap in provision.

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. | and ribbon shredders being replaced by locked waste cabinets and crosscut shredders.

A register has been maintained of all records destroyed from the main Library Archive. | | 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. | 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. |
|---|---|---|---|---|---|---|---|---|
| 7. Archiving and Transfer | A | G | A | 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. | Since the plan was agreed, transfer arrangements for physical records moving to the Library Archive have been successfully implemented. All transfers to the archive are recorded and arranged through the records management staff.

Work has been ongoing to rationalise and organise the main Library Archive storage space. A complete listing of the contents of the archive (at box level) was performed and the location of any new records is recorded at | The progress described is very positive and NLS are well on their way to meeting the Keeper's requirements. NLS are recognising that those of their business records which have enduring value should become part of the collections and be preserved and made accessible in the same way as the rest of the collections. The Assessment Team look forward to seeing the Digital Preservation Plan in due course as part of the evidence of formalising the transfer | 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. |

						ingest. Good progress has been made so far with work to rationalise the main archive, though the content remains largely unorganised in terms of the BCRS and the specific contents of boxes and other containers are not normally listed. The process of archiving electronic records selected for permanent preservation is still being developed. A new Digital Preservation Plan is being developed within the Library and will be submitted for approval in late 2018. This policy sets out plans for preserving access to digital content, including corporate records.	of records selected for permanent preservation required by the Keeper.		If this was a formal re-submission it is likely that this element of the Plan would turn from Amber to Green.
8. Information Security	G	G	G	G	Update required on any change.	A new and more robust Information Security Policy was approved by senior management in January 2018 and is currently being implemented in the Library. The new Information Security Policy is available on our website at: https://www.nls.uk/media/1623043/2018-information-security-policy.pdf.	This update is noted with thanks. The Assessment Team note that the policy is deals primarily with the security of information held digitally.	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.
9. Data Protection	G	G	G	G	Update required on any change.	A variety of changes have been made to our policies and procedures to ensure compliance with the GDPR and Data Protection Act 2018. A new Data Protection Policy was approved by senior management in April 2018. Training was provided for all staff over April and May 2018. A Personal Data Register has been created in accordance with new legislation, which	This update is noted with thanks. The new Data Protection Policy is thorough and comprehensive and should serve as an exemplar to other public authorities.	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	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

						records the location of personal data in records and systems across the Library. The new Data Protection Policy is available on our website at: https://www.nls.uk/media/1632540/2018-data-protection-policy.pdf.		members of staff who wished to re-attend.	For training see element 12 below.
10. Business Continuity and Vital Records	A	G	A	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' 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.	Work is ongoing to update the Library's BCPs, which are still localised and under review across the organisation. Senior management are scheduled to review the BCP framework over 2018/2019. Digital BCPs have recently been developed. These identify digital systems and records which are vital to the organisation. Physical vital records, however, are still to be identified.	There is some progress in this area which is welcome. Business records are one of the key resources which underpin the core business of protecting and enhancing the national collections. The loss of vital business records in any format would impact the operations of NLS. It is therefore positive to hear that digital BCPs have been developed. The Assessment Team would welcome further progress in identifying and protecting any vital records in paper format.	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 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.	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 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.
	A	G	A	A	The Keeper is able to	Procedures are now in	It is to be expected	The File Naming Convention	The SharePoint migration should

Element									
11. Audit Trail	(Amber)	(Green)	(Amber)	(Amber)	**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.**	place to log any files withdrawn from the physical Library Archive. Access to records within the Library Archive is controlled; however, investigative work still needs to be performed into audit trail practices for physical records managed elsewhere in the organisation. There is still room for improvement in maintaining an audit trail for electronic records. As the transition of electronic records from shared drives to SharePoint in Office 365 commences, audit trail processes will improve. The File Naming Convention was finalised in March 2017 and made available throughout the Library. Widespread adoption of the conventions is still to be achieved but further education will be given during future records management training, in particular once the new Information Officer role is filled (expected to be January 2019).	that the process of establishing file tracking systems will be gradual, requiring co-operation of staff across the organisation. As staff are already familiar with the need to track collections items rigorously, it should not be difficult to extend those principles to physical business records, even if it is time-consuming. Implementing file tracking and audit for electronic records requires intervention at a design stage in the transition to new systems and the Assessment Team will welcome updates on this as it is implemented. The Keeper expects to see the File Naming Convention now that it is available.	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.	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 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	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).
13. Assessment and Review	G	G	G	G	Update required on any change.	Since January 2017, an internal assessment of the progress of the implementation of the RMP has been carried out and submitted to senior management	This system of quarterly reports to senior management shows a continuing commitment to improvement and the NLS is to be	No change	No immediate action required. Update required on any future change.

						every quarter. The Records Management Coordinator attends a quarterly meeting of the senior management team to discuss the RMP work of the quarter and appraise the internal assessment.	commended for maintaining this as well as submitting this Progress Update Review.		
14. Shared Information	N/A	N/A	N/A	N/A	Update required on any change.	No change. The Library complies with the Data Protection Act 2018.	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

<u>Version</u>

The progress update submission which has been assessed is the one received by the Assessment Team on 26th February 2020. 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 the National Library of Scotland.

PRSA Assessment Team's Summary

The Assessment Team has reviewed the National Library of Scotland's Progress Update submission 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 this authority's efforts to keep its Records Management Plan under review.

<u>General Comments</u>

The 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.
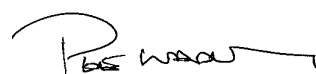
The Keeper cannot change the status of elements formally agreed under a voluntary submission, but he can use such submissions to indicate how he might now regard this status should the authority choose to resubmit its plan under section (5)(6) of the Act.

8. The Public Records (Scotland) Act Assessment Team's Evaluation

Based on the progress update assessment the Assessment Team considers that the 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,

………………………………

Pete Wadley
Public Records Officer