The Public Records (Scotland) Act 2011

Scottish Fire and Rescue Service

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

21st June 2022

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 Fire and Rescue Service. The outcome of the assessment and relevant feedback can be found under sections 6 – 8.

4. Authority Background

The Scottish Fire and Rescue Service was established on 1st April 2013, bringing together Scotland's previous eight fire and rescue services and the Scottish Fire Services College. The main purpose of the Scottish Fire and Rescue Service is to work in partnership with communities, the public and private sectors and other agencies on fire safety, prevention, protection and emergency response to improve the safety and wellbeing of people throughout Scotland.

The Scottish Government appointed a Chair and 11 other members to serve as members of the SFRS Board. The Act allows for the appointment of up to a total of 15 members. The Board provides strategic direction, support and guidance to the SFRS ensuring that it operates effectively and that the Scottish Government's priorities are implemented. Board members are personally and corporately accountable for the Board's actions and decisions. They also scrutinise plans and proposals and hold the Chief Officer Martin Blunden and Strategic Leadership Team (SLT) to account.

Based in Cambuslang, the SFRS Strategic Leadership Team (SLT) is responsible for delivering the Scottish Fire and Rescue Service on behalf of the Board. The SLT is headed up by the Chief Officer.

http://www.firescotland.gov.uk

5. Assessment Process

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

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

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

Key:

G	The Assessment Team agrees this element of an authority's plan.	A	The Assessment Team agrees this element of an authority's progress update submission as an 'improvement model'. This means that they are convinced of the authority's commitment to closing a gap in provision. They will request that they are updated as work on this element progresses.	R	There is a serious gap in provision for this element with no clear explanation of how this will be addressed. The Assessment Team may choose to notify the Keeper on this basis.

6. Progress Update Review (PUR) Template: Scottish Fire and Rescue Service

Element	Status under agreed Plan 08DEC17	Progress status 29OCT19	Progress status 21JUN22	Keeper's Report Comments on Authority's Plan 08DEC17	Self-assessment Update 15MAR19	Progress Review Comment 29OCT19	Self-assessment Update as submitted by the Authority since 29OCT19	Progress Review Comment 21JUN22
1. Senior Officer	G	G	G	Update required on any change	Following agreement by the Keeper, the SFRS RMP was submitted to the Strategic Leadership Team (SLT) and approved on 15 January 2018 to be adopted and implemented throughout SFRS. It has been uploaded to the SFRS Intranet for staff reference and its issue announced to all staff. It has also been uploaded to the SFRS website for public reference. NEW EVIDENCE: E004 SLT covering report for approval of RMP, 15/01/2018 E005 SLT minutes showing approval of RMP, 15/01/2018 E157 Intranet News Item re Issue of RMP, 03/05/2018 E158 Intranet screenshot – RMP available to staff E162 SFRS website – RMP available to public	There has been no change to the Senior Officer for SFRS. The evidence submitted demonstrates that the Senior Officer, Mark McAteer, (SIRO and Director of Strategic Planning, Performance and Communications) is taking the lead in ensuring that the agreed RMP is appropriately supported and implemented throughout SFRS. SFRS have published the RMP on their website which the Keeper encourages.	There has been no change to the Senior Officer with overall strategic responsibility for records management within SFRS, this still being Mark McAteer.	The Assessment Team thank you for letting us know that there has been no change to this Element. Update required on any change.
2. Records Manager	G	G	G	Update required on any change	No change.	No immediate action required. Update required on any future change.	There has been no change to the individual with day-to-day operational responsibility within SFRS, this still being Morag Allan, Records Management Officer.	Thank you for letting us know that there has been no change to this Element. Update required on any change.
3. Policy	G	G	G	Update required on any change	The SFRS Records Management Policy has recently been reviewed and updated by the Records Management Officer. The current version has been uploaded to the SFRS Intranet and also to the SFRS website. It will be reviewed again in 2 years' time. UPDATED EVIDENCE: E003 Records Management Policy	SFRS are maintaining a regular review of their Records Management Policy, which is best practice. It is helpful to see that this policy is also made publicly available, alongside the RMP.	The SFRS Records Management Policy was reviewed and updated in February 2021 (with a minor amendment in December 2021). It will be reviewed again in 3 years' time, in February 2024. UPDATED EVIDENCE: E003 Records Management Policy (link to Policy on SFRS website)	Thank you for this update on Records Management Policy review, and the accompanying evidence which has been noted with thanks. It is reassuring to see that SFRS continues to keep their RM Policy under regular review.

| 4. Business Classification | A | A | A | Evidence has been shared with the Keeper to demonstrate commitment to pursue a single *Business Classification Scheme* for SFRS.

However this is not yet ready for implementation and: "The scheme has not been imposed on [the] shared sites at this stage." (*Plan* page 17)

Please see comments in element 5, below, for more about 'adding value' to the *Classification Scheme* by, for example, combining with the *Retention Schedule*.

N.B. The development of this element is tied in to the development of a central service-wide records management structure as explained above. This will also effect elements 5, 6 and 11 below.

The Keeper is able to agree this element of Scottish Fire and Rescue's plan under 'improvement model' terms. This means that the authority has identified a gap in their records management provision (use of legacy drives and an eRDM not yet implemented) and have put processes in place to close that gap – see above. The Keeper's agreement is conditional on his being updated on the progress of this project when requested. SFRS have committed to doing this in the introduction to the *Plan* (page 8). | SFRS is currently rolling out the Modern Desktop project, to upgrade all operating systems to Windows 10 and to introduce Office 365. The ICT department issue regular Updates on progress.

SFRS commissioned a SharePoint consultant to analyse the existing environment and to make recommendations for the proposed environment. Information Governance have reminded ICT of the need to involve IG in the development and implementation of the new SharePoint environment.

The File Classification Scheme will be reviewed and developed for implementation within the new SharePoint Online site environment, to enable staff to better manage their records.

An Information Asset Register has also been created to ensure compliance with GDPR (see Element 9) – this may be combined or linked with the File Classification Scheme and/or Records Retention Schedule in future.

NEW EVIDENCE:
E183 SFRS ICT Update, Modern Desktop, February 2019
E184 SFRS SharePoint Analysis, supplied by ICT, 17/07/2018
E185 SFRS SharePoint Governance Plan, supplied by ICT, 17/07/2018
E186 SFRS SharePoint Delivery Estimates, supplied by ICT, 17/07/2018
E187 SFRS SharePoint Migration Plan, supplied by ICT, 17/07/2018
E188 SFRS SharePoint High Level Sites, supplied by ICT, 17/07/2018

UPDATE SEPT 2019:
The ICT Project Manager has recently provided Information Governance with an update regarding the SharePoint project – 'The current position is that SFRS ICT expect to go out to market next financial year for a Corporate Document Management Solution that would connect into Office 365 and SharePoint. The expectation is that Information Governance would feed into the requirements for the solution and the options appraisal.'

When registration opens, the Records Management Officer will register to attend the NRS SharePoint consultation event mentioned in the Team's comments, which she understands is now scheduled for October 2019. | The PRSA Team note that there are a number of changes in technology and formats in progress. The Business Classification Scheme should inform the use of this new technology. The input of records managers is essential to ensure that the use of technology supports efficient and effective management of information which underpins the operational and strategic aims of SFRS.

The Sharepoint analysis documents indicate that the hubs and sites are designed to reflect the organisational structure and geographic dispersal of SFRS staff. While this is a business decision, it does present a risk that similar record types could be treated differently by staff in different hubs or sites. Development of content types that reflect the File Classification Scheme will therefore assist staff to apply common retention and disposal policies and procedures across the whole organisation. The update provided in September 2019 provides reassurance that Information Governance will be involved in this implementation.

It is appropriate and sensible to use the Information Asset Register to inform and develop the proposed | The SFRS SharePoint project was initiated in 2018 to accomplish two very specific goals. The first goal being to upgrade and migrate our on-premise SharePoint to the M365 cloud environment. The second goal was to take the opportunity to modernise our customer SharePoint experience and develop a layer of governance around data owners and permissions. The project ran for approximately two years and spanned every department in the Scottish Fire and Rescue Service (SFRS).

Prior to the project, the SFRS were holding SharePoint data from eight legacy services across several spaces. There was data in each of the legacy services' ICT infrastructure and in the M365 cloud. None of this data was harmonised, nor was it governed properly on a national scale. Permissions were nested and very difficult to manage. The SharePoint project engaged with every department in the Service and developed a data migration plan to harmonise SFRS SharePoint layouts, permissions and structure. As these engagements took place, data owners were identified. Once identified, all permissions were wiped in the new environment and the data owners were instructed on how to assign and manage permissions properly. The result was a single, streamlined, corporate SharePoint cloud environment with ease of use, well managed data and permission levels.

During the next phase, members of ICT and Information Governance attended a M365 week long training event in December 2021 to support the Service moving forward with full adoption and a change management plan. This includes building retention into the M365 environment, business classification, disposal actions, incorporating the Information Asset Register and backups. This is being monitored by our Digital Board who are responsible for providing a strategic and corporate overview of the work of the SFRS in delivery of the Digital Strategy and to report back to the Senior Management Board (SMB) and Strategic Leadership Team (SLT) as necessary.

The ICT department have made in-house and Microsoft materials available on training sites, with links to these available on the staff intranet.

The Records Management Officer has updated the Records Retention Schedule (see Element 5) to make the layout less dependent on the organisational structure and more user-friendly. | The Assessment Team thanks SFRS for this update on SharePoint and M365 cloud environment project. It is clear that a significant amount of work has already taken place to implement a single cloud environment for SFRS digital records management. The approach to this major project appears to be well-planned and appropriately gradual, including a significant programme of staff training to support this change. As explained by the authority, this change has implications beyond business classification.

The evidence provided is noted with thanks.

The SharePoint implementation process seems to be well underway, but it is still likely to take a significant amount of time to bed in properly. While SFRS is indubitably making very good progress, this element will remain at Amber while the project is ongoing. The Assessment Team look forward to future updates on progress in consecutive PURs. |

| | | | | | | File Classification Scheme and the Records Retention Schedule. The PRSA Assessment Team note that the Information Asset Register has not been used to develop the SharePoint structure. It may therefore be helpful to use the Information Asset Register to inform the content type development. SFRS may find it beneficial to attend the NRS SharePoint consultation event in October 2019. | The retention periods in the Schedule will be used to build retention into the M365 site environment.

The Records Management Officer attended the NRS SharePoint consultation event in Glasgow on 29/10/2019, the purpose of which was to share experiences, concerns and successes in using SharePoint for records management in our organisations and to launch a National SharePoint Collaboration Network.

NEW EVIDENCE:
E277 SharePoint seminar, Glasgow, NRS Notes 29/10/2019
E278 SharePoint seminar, Glasgow, RMO Notes 29/10/2019
E279 SFRS ICT Update Modern Desktop, September 2019
E280 Intranet Screenshot – ICT Page with Links to Training Sites
E281 SharePoint Screenshot – SFRS O365 Training Site
E283 M365 Governance SharePoint Online and OneDrive for Business, 03/12/2021 (example presentation from training event)
E284 Digital Board Action Log, 10/12/2021
E285 Digital Board, Terms of Reference, 01/06/2021 | |
| 5. Retention Schedule | A | A | A | N.B. The development of this element is tied in to the development of a central service-wide records management structure as explained above (see element 4). This will also effect elements 6 and 11 below.

However, the *Interim Retention Schedule* under which SFRS is operating does not cover all record types in the business. The authority is currently developing a full version by providing business units with a template/feedback form to complete (this has been shared with the Keeper). The Keeper commends the involvement of local business areas in the design of the *Retention Schedule* as liable to | Very little feedback was received from departments after the issue of the Interim Retention Schedule.

Responses received for the Information Asset Register (see Element 9) will be used to further populate the Interim Schedule. Then, at a later date, staff will be reminded that feedback is still required.

The Records Management Officer will ensure that any references within SFRS policies, procedures, etc. to record types and their retention periods will be captured in the Schedule.

The RMO also deals with ad hoc retention queries, updating the Schedule as and when required. For example, she has recently dealt with enquiries regarding: Community Safety Engagement records (safeguarding adults, safeguarding children, firesetter intervention and re-education); water planning correspondence and hydrant inspection records; and absence e-forms.

NEW EVIDENCE:
E213 Emails re Water Planning Records Retention, 08/03/2019 | This update, required by the Keeper, is noted, with thanks.

The development and implementation of a retention schedule is on-going and the PRSA team would encourage continuing engagement with operational teams in order to identify the most appropriate retention periods for their records. This will help SFRS staff to find records when they need them and will protect the SFRS from the reputational and financial risks of destroying records too early and or retaining records for too long.

The structure of Sharepoint hubs and | The Records Management Officer continues to deal with ad hoc retention queries, updating the Schedule as and when required and re-issuing it on the intranet. This involves engaging with the enquirer and other departments. Dealing with queries also involves referring to other records retention schedules available online, e.g. SCARRS and those of other UK Fire and Rescue Services.

As with other authorities, SFRS staff had to start working from home in March 2020, where possible. This led to changes in what we could do and how we could to it, with the limitations of working on a laptop at home. It also led to adjustments to priorities. The Records Management Officer has had to reprioritise her workload, as more of her time is currently taken up with document control, with a suite of internal COVID-19 related documents requiring processing, not only when they are first issued but also when they are regularly updated to keep up with Government guidelines.

As a result of this, the Records Management Officer has not yet systematically gone through the Information Asset Register for retention information | Thank you for this update on records Retention Schedules. The evidence provided is also noted with thanks.

As indicated under Element 4, the SharePoint project will have implications on retention arrangements. It appears that SFRS has diligently considered this, implementing change in a manageable and user-friendly ways. While work remains in-progress, SFRS has made clear headways and |

Element								
				create a stronger business tool. He notes also that SFRS have recognised that a combined *Business Classification Scheme/Retention Schedule* would be a stronger business tool than two separate documents. The Keeper agrees and notes that if 'extra' information as mentioned above is added then the basics of an Information Asset Register could be created which might be a stronger tool yet… The Keeper is able to agree this element of Scottish Fire and Rescue's plan under 'improvement model' terms. This means that the authority has identified a gap in their records management provision (currently running on an incomplete 'interim' retention schedule) and have put processes in place to close that gap – see above. The Keeper's agreement is conditional on his being updated on the progress of this project when requested. SFRS have committed to doing this in the introduction to the *Plan* (page 8).		sites is high level and does not readily correspond to the functions or records identified in the retention schedule, or to the Information Asset Register. As noted in Element 4, the development of content types for SharePoint should reflect the information compiled in the Records Retention Schedule, the File Classification Scheme and the Information Asset Register.	to further populate the Records Retention Schedule. However, the Records Management Officer has updated the Records Retention Schedule to make the layout less dependent on the organisational structure and more user-friendly. The Schedule was in Word format but has been changed to Excel format. Instead of having 3 layers of directorate / function / department, there is now one layer – department or topic. It was always the intention to make the layout less dependent on the organisational structure, recognising that this is not best practice. Recent structure changes have accelerated the desire / requirement to make the necessary changes. The Records Management Officer has also updated the Records Retention Schedule Feedback Form to include questions for staff to ask themselves when determining retention periods and renamed it the Records Retention Schedule Information Gathering Form. The new style Schedule and Form were issued on the SFRS intranet and staff informed on 30/06/2021. The retention periods in the Schedule will be used to build retention into the M365 / SharePoint site environment (see Element 4). The Information Governance Manager asked if filters could be added to the Schedule (possible in Excel), so that we can filter by retention period, for example. This has been added, as has giving the Trigger Event, Retention Period and Disposal Action in one more user-friendly sentence, e.g. 'Keep for 6 years from end of financial year in which record created, then destroy' while retaining the separate columns to allow filtering/sorting, if required. UPDATED EVIDENCE: E027 Records Retention Schedule V22.0, issued 14/01/2022 E028 Records Retention Schedule Information Gathering Form V1.0, issued 30/06/2021 NEW EVIDENCE: E239 Intranet Screenshot – News Item re Issue of Records Retention Schedule in Excel, 30/06/2021	should be commended for persevering with this complex but essential project, especially with the necessary reprioritisations that took place as a result of COVID-19. As this Element is closely tied up with Elements 4, 6 and 11, the RAG status of Amber will be retained while the SharePoint project is ongoing.
6. Destruction Arrangements	A	A	A	N.B. The development of this element is tied in to the development of a central service-wide	SFRS have awarded their Soft Facilities Management contract to Sodexo, who sub-contract out confidential waste disposal to Shred-it. The contract went live on 1 March 2019.	It is positive to see good progress being made in ensuring that there is appropriate	SFRS now have a process in place for handling confidential waste.	Thank you for this update on the process of confidential waste

				records management structure as explained in element 4. This will also affect elements 5, and 11. The *Plan* states (page 31): "SFRS will investigate how to develop and implement records destruction arrangements for records in all formats, especially all electronic formats and locations, e.g. e-mail, recycle bins, folders/drives of employees who have left, etc." The Keeper notes that, until the Service can be confident that records are disposed of according to their retention decisions, this issue remains a 'risk'. The controlled and systematic deletion of records held on shared drives is a particular area of difficulty for many public authorities and the Keeper welcomes the acknowledgement of this. He agrees that the suggested improvements the Authority is considering are a reasonable response to these difficulties. Therefore, the Keeper may be able to accept these statements as grounds for agreeing this element under improvement model terms if other destruction issues can be settled, particularly regarding evidence around the retention of back-up copies (see below). The *Records Management Policy* makes it clear that SFRS understand the importance of logging the destruction of records for future reference. The Keeper has seen a draft	The Records Management Officer and Information Governance Manager have worked with the Soft FM team and Sodexo to ensure the arrangements put in place meet our needs and comply with PRSA requirements. They are working together to ensure that a robust internal process is put in place and the RMO will develop a Records Destruction Procedure to provide guidance to staff. The RMO and IGM have agreed that, for the time being, a simplified Records Destruction Form will be developed (i.e. for destruction only, not the previously drafted Records Disposal Form, including transfer/archiving details). ICT confirmed the arrangements for destruction of electronic records to the Soft FM Manager. The RMO will include details for electronic records destruction in the Form and Procedure. NEW EVIDENCE: E029 Records Destruction Form (draft) E189 Intranet screenshot – Soft FM Services, 08/03/2019 E190 Intranet News Item – Changes to Soft FM Services, including confidential waste, 15/02/2019 E191 Emails re Electronic Waste Disposal, 18/01/2019	confidential destruction of records in all formats. The methods of destruction appear appropriate. The decisions on what should be destroyed and when, however, must rely on the development of a retention schedule which covers all record types and which is routinely referred to before records are destroyed. The draft simplified Records Destruction Form acknowledges that not all records are covered by the Retention Schedule and sensibly reminds staff to contact the Records Management Officer prior to disposal of these records. This should make it easier for the records to be discovered and included in the Schedule. It may also assist in ensuring that records of enduring value are discovered and transferred to an appropriate archives (see Element 7). The PRSA Team look forward to receiving information in the next PUR about the arrangements for secure destruction of electronic records including destruction of back-ups in accordance with the Records Retention Schedule.	There are ad hoc enquiries about the process for confidential waste and, as the result of a request for some guidance, a Confidential Waste Guidance Poster was produced, to be displayed beside the confidential waste consoles, which was issued on the Intranet in February 2020. Following discussions with the local Soft FM Co-ordinator and local Admin Team Leader, the Admin Team Leader produced guidance for admin teams on dealing with confidential paper waste, as they are often asked by staff about this. The Records Management Officer intends to build on this to produce a Procedure for disposal of all records in all formats to be available to staff. Destruction of back-ups is included under Elements 4 and 11 as part of the M365 project. NEW EVIDENCE: E240 Confidential Waste Guidance Poster, issued 27/02/2020 E241 Intranet Screenshot – Confidential Waste Guidance Poster available to staff E242 Admin Guidance Note – Confidential Waste, 19/10/2020	handling. It is essential that staff is aware of appropriate procedure, and it is good to hear guidance has been created in response to ad hoc enquiries. The evidence provided is noted with thanks. As this Element is closely tied up with Elements 4, 5 and 11, the RAG status of Amber will be retained while the SharePoint project is ongoing.

				copy of the disposal form. The Keeper commends this. However, it is noted that "The Disposal Form will not be issued for staff to use until a national solution for records destruction is in place; until then, staff will continue to use local, legacy arrangements for records destruction." (*Plan* page 28). The *Records Management Policy* (page 15) and the *Plan* (page 27) both refer to SFRS having a *Records Destruction Arrangements* procedure. The Keeper requires to be provided with this guidance document as soon as it is available. The Keeper is able to agree this element of Scottish Fire and Rescue's plan under 'improvement model' terms. This means that the authority has identified a gap in their records management provision (formal destruction processes for electronic records are not yet fully embedded) and have put processes in place to close that gap – see above. The Keeper's agreement is conditional on his being updated on the progress of this project when requested.				
7. Archiving and Transfer	A	A	A	The *Records Management Policy* (page 15) and the *Plan* (page 35) both refer to SFRS having a *Records Transfer Arrangements* procedure in the future. The Keeper requires to be provided with this guidance document as soon as it is available.	No progress made. As suggested by NRS staff, once the File Classification Scheme is implemented in the new SharePoint environment, the Records Management Officer will contact the NRS again to work to identify SFRS records suitable for transfer to NRS and to develop a mechanism for the transfer of these records in future. In time, a full Records Disposal Form and Register will have the facility to record transfers.	It is important that mechanisms are put in place to ensure that records of enduring value are transferred to an appropriate archives. The development of robust mechanisms for the transfer of digital records to NRS should be addressed as soon as practicable. Digital	The Records Management Officer is aware that some of the records which we would hope to transfer to the NRS have now reached the end of their retention period, e.g. Board papers are listed in the Records Retention Schedule as 'Keep for 6 years after end of calendar year in which record created, then archive externally', SFRS having come into being on 1 April 2013. Unfortunately, due to the current COVID-19 pandemic, we have been unable to progress this process throughout SFRS. Our intention is to	An authority's Records Management Plan must detail its archiving and transfer arrangements in order to ensure that records of enduring value are properly deposited in an appropriate archive

Element								
				The Keeper is able to agree this element of Scottish Fire and Rescue's plan under 'improvement model' terms. This means that the authority has identified a gap in their records management provision (no formal MOU with an appropriate archive) and have put processes in place to close that gap – see above. The Keeper's agreement is conditional on his being updated on the progress of this project when requested. SFRS have committed to doing this in the introduction to the *Plan* (page 8) and to supply the MOU (page 37).	UPDATE SEPT 2019: As per NRS suggestion, SFRS will add a general policy statement supporting the transfer of legacy services' historical records to archives within Element 7 of the RMP. In the section, 'Transfer to public archive', we will add the statement, 'Many of the paper records of the 8 legacy fire and rescue services have been transferred to appropriate local authority archives and work continues to ensure that any remaining records are identified and transferred, as appropriate.'	records are vulnerable to bit-loss, obsolescence or corruption of hardware or software if they are not transferred into a secure digital preservation system within five years of creation. Many of the paper archival records of the predecessors of the SFRS are safely and appropriately deposited in the archives services of local Councils. The PRSA team commend this approach and welcome the intention to add the statement supporting these arrangements for the records of the former fire services before 2013, as explained in the September 2019 update.	review all records to be transferred and establish contact with the NRS Client Management Team to discuss how to move this forward and establish an MoU.	repository. It is a concern that records selected for permanent preservation are not currently being transferred to a repository with capability for longer-term preservation, especially when this concerns born-digital records. An MoU or Service Agreement should be pursued with the NRS Client Management Team as soon as possible. It is positive that SFRS remains committed to remedying the situation despite the inevitable delay. This Element will remain at Amber until an MoU with NRS is agreed and appropriately formalised.
8. Information Security	G	G	G	Update required on any change	Although this element was agreed as 'green', given the introduction of GDPR, a lot of progress has been made regarding Information Security, so it was felt appropriate to provide an update and new/amended evidence to indicate this. The Information Governance Manager has developed a business case to be presented to the SLT to seek additional secure email licences. The Information Security Officer has: • produced guidance on the secure email system which has been issued to staff; • developed new ICO posters for distribution; • developed a presentation for inductions on GDPR, information sharing, etc.; • launched a mandatory Data Protection and Information Security e-learning package for all personnel within SFRS (see Element 14); • developed a draft Data Breach Policy to ensure a Service-wide response to any reported data breach incidents;	These updates and evidence are noted with thanks. It is clear that the SFRS takes the issue of information security very seriously and continues to develop useful tools to ensure that staff are aware of the risks and their responsibilities. The evidence provided overlaps with the requirements for Element 9 so comments here should be read in conjunction with the comments for Element 9.	Although this element was agreed as 'green', SFRS continues to develop useful tools to ensure that staff are aware of the risks and their responsibilities. The Information Security Officer has reviewed and updated the Acceptable Use Policy and the Network Password Policy, both first issued in October 2017. Information Governance also developed a new Government Security Classifications Policy, which was issued to staff in September 2020, along with a Quick Guide and Tracker. Managers were informed about these documents in 2 Managers' Briefs, informing them of their requirements to ensure their staff were aware of the documents and how to use them. They were also asked to complete the Tracker for their staff and return it to the Information Security Officer. The	Many thanks for this thorough update. This Element highlights the need for the authority to have adequate controls in place to prevent unauthorised access, alteration, removal or destruction of records. The reported continuous improvement indicates that Information Security remains a key point of focus for SFRS, and this positive

- developed a draft Government Security Classifications Policy to ensure the appropriate level of protection is applied to all information.

NEW EVIDENCE:

E196 Business Case to SLT re Additional Secure Email Licences, 19/12/2018
E197 GDPR Think Check Share poster
E198 GDPR Share It Appropriately poster
E199 GDPR Think Privacy poster
E200 Information Governance Presentation for Rural Retained Personnel Induction
~~E201 Data Breach Policy (draft)~~ (superseded in Sep 2019)
E202 Government Security Classifications Policy (draft)
E216 Emails re Support Staff Induction Mandatory Learning, 26/02/2019

UPDATED EVIDENCE:
E057 Secure Email User Guide

UPDATE SEPT 2019:
The draft Data Breach Policy was renamed the Personal Data Breach Procedure, approved by the Corporate Assurance Board * on 18/04/2019 to go out for consultation, authorised by the Director of Strategic Planning, Performance and Communications and issued to staff on 29 July 2019. The Procedure, along with its accompanying forms, Personal Data Breach Incident Report Form and Timeline of Personal Data Breach Incident, were uploaded to the SFRS Intranet and their issue announced to staff.

* see SFRS RMP, Element 13, 'Information Governance Group' section for an explanation of CAB

NEW EVIDENCE:
E201 Personal Data Breach Procedure
E233 Personal Data Breach Incident Report Form
E234 Timeline Personal Data Breach Incident
E235 CAB covering report for approval of Personal Data Breach Procedure, 18/04/2019
E236 CAB minutes showing approval of Personal Data Breach Procedure, 18/04/2019
E237 Intranet screenshot – News Item re issue of Personal Data Breach Procedure
E238 Intranet screenshot – Personal Data Breach Procedure and forms available to staff

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The draft Data Breach policy was seen by the Assessment Team and while it was very good, the Team commented that it relied on quite a lot of legal language which might not have been easily understood by all members of staff. The approved Personal Data Breach Procedure, supplied in September 2019, was clearer with less legal language. SFRS have also made use of ICO posters to make this clearer to staff. The forms in use should assist staff in following the procedures which support this policy.

The PowerPoint presentation for rural retained personnel provided as evidence is thorough and clear, covering both information security and data protection issues. The use of the ICO posters within the PowerPoint and separately, should serve as useful reminders of the contents of the PowerPoint.
It is very positive to see that there is considerable development and progress in this Element which was already assessed as being of a high standard.

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documents are also available on LCMS, the SFRS e-learning system.

In March 2020, as most staff started to work from home, due to the COVID-19 pandemic lockdown restrictions, the Information Governance Manager issued an Awareness Briefing to staff regarding information security tips for homeworking.

ICT have produced training materials for staff on the topic of cyber security, with information available on the Intranet, access to a training portal and guidance on accessing and completing the training. The information on the Intranet covers various topics, including 'Information in the Workplace' and 'Workplace Behaviours', thus tying in with Information Security. ICT launched their cyber security awareness campaign for 2020 on 15/09/2020, with staff being required to complete the CybSafe training by 20/11/2020. Staff have recently been asked to refresh their training by completing the modules again by 25/02/2022.

In 2021, SFRS were involved in an external review on security, providing evidence and attending interviews so that we can make improvements. A Security Management Survey was issued to all staff on 01/03/2021 to be completed by 12/03/2021 to help inform the review. Relevant members of staff, e.g. the Information Governance Manager, were interviewed and relevant documentation requested. SFRS have received the outcomes of this review and an Organisational Security Board has been established to ensure any recommendations/actions are included in our implementation plans. The first meeting was held on 28/01/2022 and a draft Terms of Reference produced.

Information Governance have developed a new process for requesting a mobile app to be made available in our App Store. When requesting an app to be considered, staff should complete a request form. The form requires staff to provide details of the app, why it is required and approval from a manager. The instructions also state that staff will need to complete a Data Protection Impact Assessment, if the app processes personal data, and may be asked to complete a General Security Impact Assessment. The final decision is made by Information Governance.

Information Governance have also developed a new process for requesting third party system access. When requesting access (for example, to

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update shows this still to be the case.

The review of Acceptable Use Policy and the Network Password Policy, and the development of Government Security Classification Policy, all successfully rolled out, is also noted with thanks.

It is especially good to see that the changes to information security brought about by home- and hybrid working continue to be properly considered at SFRS.

The update on staff Cyber Security Training is also noted. This relates to Element 12 as well as information security compliance.

The processes developed for both requesting a mobile App and third-party system access sound very promising. Apps, in particular, need to be properly considered if they should contain sensitive or key business information.

The receipt of the additional evidence is noted with thanks. Whilst the PUR process does not allow for a detailed

| | | | | | the emails of a member of staff who has left SFRS), a manager should complete a request form. The form requires the manager to provide details of the systems required, why access is required and approval from their Head of Function. The final decision is made by Information Governance.

These 2 forms were issued on the SFRS intranet and staff informed on 21/01/2022. In due course, the processes will be built into the ICT Service Desk Portal.

UPDATED EVIDENCE:
E053 Acceptable Use Policy, updated 03/03/2021
E054 Network Password Policy, updated 08/09/2020

NEW EVIDENCE:
E243 Government Security Classifications Policy, issued 04/09/2020
E244 Government Security Classifications Policy Quick Guide, issued 04/09/2020
E245 Government Security Classifications Policy Tracker, issued 09/09/2020
E246 SFRS Managers' Brief, 19/08/2020
E247 SFRS Managers' Brief, 11/09/2020
E248 Intranet screenshots showing GSC documents available to staff
E249 Awareness Briefing – Information Security Tips for Homeworking, issued 19/03/2020
E250 Intranet screenshot – Cyber Security – General
E251 Intranet screenshot – Cyber Security – Information in the Workplace
E252 Intranet screenshot – Cyber Security – Workplace Behaviours
E253 Intranet screenshot – Cyber Security – Training
E254 CybSafe Guidance Document, issued 18/09/2020
E255 SFRS Weekly Brief, 15/09/2020 re Cyber security training
E256 SFRS Weekly Brief, 01/03/2021 re Security Management Survey
E257 SFRS Weekly Brief, 16/11/2021 re refresher Cyber Security training
E258 Security Management Survey Information Request, 15/02/2021
E286 Mobile App Access Request Form V1.0, issued 21/01/2022
E287 Third Party System Access Request Form V1.0, issued 21/01/2022
E288 Intranet screenshot – News Item re issue of Mobile App Access Request Form, 21/01/2022 | scrutiny of each of the documents provided, it is clear that SFRS continues to take its legal responsibilities with regard to information security seriously. |

							E289 Intranet screenshot – News Item re issue of Third Party System Access Request Form, 21/01/2022 E290 Intranet screenshot – Mobile App and Third Party System Access Request Forms available to staff, 21/01/2022	
9. Data Protection	**G**	**G**	**G**	Update required on any change	Although this element was agreed as 'green', given the introduction of GDPR, a lot of progress has been made regarding Data Protection, so it was felt appropriate to provide an update and new/amended evidence to indicate this. SFRS have been preparing for GDPR for some time and have been working with all departments to identify compliance gaps and support implementation of revised policies and procedures where necessary. Activities include: • we have developed a register of all processing (Information Asset Register); • we have documented policies and procedures; • we have provided news items and guidance to staff on GDPR and DPIAs; • we have developed privacy impact assessments and breach management procedures (see Element 8); • we have added an 'Information Governance' section to the report template for Board/SLT/SMT meetings, directing staff to complete a DPIA; • we have produced general privacy notices for SFRS staff and for the public; • we have produced specific privacy notices and guidance for particular policies and projects, e.g. Home Fire Safety Visits; • we have updated DP guidance on the SFRS website for the public; • we have appointed a Data Protection Officer; • we have provided face to face training to key roles and launched a mandatory Data Protection and Information Security e-learning package for all personnel within SFRS (see Element 14); • we have established a GDPR Working Group, with representation from all directorates, to act as a point of contact for GDPR and take responsibility for actions; • we have conducted a gap analysis of the Information Asset Register to identify secure email requirements and any other security issues; • we have produced guidance on the secure email system which has been issued to staff (see Element 8); • we have developed new privacy posters for notice boards on all stations (see Element 8);	This update is noted with thanks. The evidence provided clearly shows that the SFRS are taking their data protection obligations seriously and have made significant and appropriate changes and improvements to their policies and procedures in line with the requirements of the Data Protection Act 2018 and GDPR. They have duly appointed a Data Protection Officer. The evidence provided for Element 9 overlaps with the requirements for Element 8 so comments here should be read in conjunction with the comments for Element 8. It is clear that the SFRS has made considerable efforts to ensure that all personnel are aware of their obligations under GDPR and the Data Protection Act 2018. They have developed procedures and forms to enable personnel to implement the policies when required and have made it as easy as possible for all personnel to understand what they have to do and when. SFRS are to be commended for this. The Information Asset Register is only	Although this element was agreed as 'green', SFRS continues to develop useful tools to ensure that staff are aware of the risks and their responsibilities. Information Governance developed the documents, Information Asset Register Guidance (General) and an IAR Example, both issued on 28/03/2019, and the IAR Guidance and Update Procedure (Management), issued on 08/05/2020, to provide guidance and to ensure the IAR is kept up to date. Each department has a Single Point of Contact, who the Information Security Officer contacts quarterly to ensure updates are provided. Information Governance also provide guidance and final approval on Data Protection Impact Assessments, which allows us to monitor all personal data processing. General and specific Privacy Notices continue to be developed, reviewed regularly and updated as required. These include Privacy Notices for COVID-19 and Brexit related issues, ensuring SFRS remains compliant with current government guidance/legislation. Although training was provided throughout SFRS on GDPR/Data Protection back in 2018, some of the higher risk areas of the Service have received further training to ensure they understand how to manage their data securely, for example, Occupational Health. The GDPR/Information Security E-Learning package is also currently being refreshed and a new bank of questions added to ensure relevance. This is part of all staff training within SFRS and monitored by the Information Governance Team. Information Governance have developed a new process for requesting a mobile app to be made available in our App Store. When requesting an app to be considered, staff should complete a request form. The form requires staff to provide details of the app, why it is required and approval from a manager. The instructions also state that	It is essential that public authorities continue to comply with their Data Protection obligations. It is positive to hear that SFRS is committed to continuous improvement in Data Protection practice and training, especially whilst staff have been working from home during the pandemic. The development of staff guidance and its dissemination is of particular import. A named departmental point of contact for the purposes of information security is noted with thanks, as is the dealing with DPIAs. The receipt if evidence provided is noted with thanks. Further comments are included under Element 8.

					• we have developed a presentation for inductions on GDPR, information sharing, etc. (see Element 8); All GDPR activities are monitored through a monthly Internal Audit meeting which feeds into our Audit and Risk Committee and ultimately our Corporate Assurance Board (CAB). NEW EVIDENCE: E169 GDPR Update 1, January 2018 E170 SLT report for approval of GDPR actions, 09/04/2018 E171 SLT minutes showing approval of GDPR actions, 09/04/2018 E172 GDPR Guidance E173 GDPR Leaflet E174 DPIA Guidance E175 Employee Privacy Notice E177 HFSV Privacy Notice E205 Information Asset Register (extract) E206 Terms of Reference for GDPR Working Group, 13/12/2018 E207 Intranet screenshot – GDPR information available to staff E208 DPIA Template E209 Intranet News Item – Changes to DP Legislation, 23/01/2018 E210 Intranet News Item – GDPR and DPA 2018 One Month In, 27/06/2018 E211 GDPR FAQs E212 Intranet Screenshot – Privacy Notices available to staff E215 Awareness Briefing – HFSVs and Introduction of GDPR E217 GDPR Action Plan 2017-2020 E218 GDPR Workshop Presentation E219 GDPR Project Plan E220 Guidance on Preparing Corporate Level Papers E222 Internal Audit Final Report GDPR, 30/08/2018 E223 Internal Audit Follow Up Actions GDPR, 27/02/2019 E226 CAB Agenda including GDPR Update, 12/12/2018 E227 CAB Report re GDPR Update, 12/12/2018 E228 CAB Report Appendix re GDPR Risks, 12/12/2018 E229 Board Report re GDPR Update, 26/04/18 E230 Board Minutes showing approval of GDPR Update, 26/04/2018 E231 Internal Audit Report, Progress Update on GDPR, 09/10/2018 E232 ARAC Strategic Risk Register Update, including Spotlight Report on GDPR 17/01/2019 UPDATED EVIDENCE: E091 SFRS website – DP information available to public E092 General Privacy Notice	required to cover those records which include personal data, but the same approach can be used to good effect with the development of the Business Classification Scheme and the application of retention schedules to all records. As with Element 8, SFRS are to be commended for continuing to invest resources into ensuring that they maintain a high standard in Element 9.	staff will need to complete a Data Protection Impact Assessment, if the app processes personal data, and may be asked to complete a General Security Impact Assessment. The final decision is made by Information Governance. Information Governance have also developed a new process for requesting third party system access. When requesting access (for example, to the emails of a member of staff who has left SFRS), a manager should complete a request form. The form requires the manager to provide details of the systems required, why access is required and approval from their Head of Function. The final decision is made by Information Governance. These 2 forms were issued on the SFRS intranet and staff informed on 21/01/2022. In due course, the processes will be built into the ICT Service Desk Portal. NEW EVIDENCE: E259 Information Asset Register Guidance (General), last issued 27/04/2021 E260 Information Asset Register Example, issued 28/03/2019 E261 Information Asset Register Guidance and Update Procedure, issued 08/05/2020 E262 Intranet Screenshot – IAR Guidance available to staff, 08/05/2020 E282 Occupational Health Information Security and Secure Email Presentation, 25/01/2022 E286 Mobile App Access Request Form V1.0, issued 21/01/2022 E287 Third Party System Access Request Form V1.0, issued 21/01/2022 E288 Intranet screenshot – News Item re issue of Mobile App Access Request Form, 21/01/2022 E289 Intranet screenshot – News Item re issue of Third Party System Access Request Form, 21/01/2022 E290 Intranet screenshot – Mobile App and Third Party System Access Request Forms available to staff, 21/01/2022 Examples of Privacy Notices: E263 Brexit Survey Privacy Notice, issued 13/11/2018 E264 COVID-19 Privacy Notice, issued 29/05/2020 (reviewed/updated 21/12/2020)	

					E094 Subject Access Request Form		
10. Business Continuity and Vital Records	A	A	A	It is the intention to support the *Business Continuity Plans* with an overarching *Business Continuity Policy*. This has been provided to the Keeper in its draft form…The Keeper requires a 'final' version of the *Policy* as soon as it is approved and operational. The Keeper is able to agree this element of Scottish Fire and Rescue's plan under 'improvement model' terms. This means that the authority has identified a gap in their records management provision (business continuity plans featuring vital records are not yet embedded in authority and proposed *Business Continuity Policy* is not available) and have put processes in place to close that gap – see above. The Keeper's agreement is conditional on his being updated on the progress of this project when requested. SFRS have committed to doing this in the *Plan* (page 8 and evidence list for element 10).	The SFRS Business Continuity Strategy (renamed from 'Policy') was issued on 22 August 2018, along with a guidance note and BIA and completed example. However, the Records Management Officer noted that the reference to vital records (which was included in the draft Business Continuity Policy and Guidance Note supplied by the Risk and Audit Manager in November 2016 for the RMP evidence package) had been removed before the final Business Continuity Strategy was issued to staff. This was recently mentioned to Internal Audit and the Risk and Audit Manager contacted to make the necessary amendments. UPDATED EVIDENCE: E096 Business Continuity Strategy NEW EVIDENCE: E099 Intranet screenshot – Business Continuity Strategy available to staff E166 Business Continuity Plan Guidance Note and Business Impact Assessment superseded in September 2019 E167 Completed Business Continuity Plan Template Example E168 Intranet News Item re Business Continuity Strategy, 23/08/2018 E178 Intranet screenshot - Business Continuity Plan Guidance Note and Business Impact Assessment available to staff superseded in September 2019 E179 Intranet screenshot – Completed Business Continuity Plan Template Example available to staff E192 Emails re Business Continuity Strategy and Vital Records, 20/02/2019 UPDATE SEPT 2019: The SFRS Risk and Audit Manager has recently amended the Business Continuity Plan Guidance Note and Business Information Assessment to include references to vital records. The new version has been uploaded to the SFRS Intranet to be available to staff. UPDATED EVIDENCE: E166 Business Continuity Plan Guidance Note and Business Impact Assessment E178 Intranet screenshot – Business Continuity Plan Guidance Note and Business Impact Assessment available to staff	The removal of references to vital records from the Business Continuity Plan was unfortunate and the SFRS have rectified this error, as shown in the September 2019 update and the supporting evidence supplied to the PRSA team. The SFRS has provided an approved Business Continuity Policy which meets part of the Keeper's requirements. This is a very positive development and contributes towards improving the provision for vital records. Now that the policy is in place, the SFRS is better placed to work towards including vital records in the Business Continuity Plans. Identifying vital records in the Information Asset Register and the Records Retention Schedule would be a useful next step.	The Information Asset Register (see Element 9) identifies vital records. The Field Definitions section asks staff to identify in the Information Asset Classification column (column F) whether the asset is 'non-essential', 'useful', 'important' or 'vital', i.e. 'without the asset there would be immediate disruption of the business likely to cause reputational and/or political embarrassment. Those records without which SFRS cannot continue to operate and which cannot be easily reproduced, if at all, from other sources'. As part of the Records Retention Schedule review (see Element 5), Information Governance intend to identify vital records in the Schedule. Vital records will also be identified as part of the 'Evidence Project', which has been set up as a sub-group-of the Information Governance Group (IGG) (see SFRS RMP, Element 13, 'Information Governance Group' section). The purpose of the Evidence Project is to provide an overall picture of evidence gathering and storage practice across SFRS, identifying risks, areas where improvement is required and to recommend appropriate actions. The draft questionnaire for the Evidence Project includes the question, 'Is there an appropriate entry in the SFRS Retention Schedule and is there a business continuity plan for the records which the relevant people are aware of?'. This covers printed/paper/original items, electronic and physical items. SFRS have also reviewed the Business Continuity Policy which is currently progressing through our corporate approval process and will be published this year. We will be able to provide further information at this time. NEW EVIDENCE: E265 Terms of Reference, IGG Evidence Project, Nov 2020 E266 Draft Questionnaire, Evidence Project, 12/11/2020	Thank you for this positive update on how the Information Asset Register works in practise. The description of the internal 'Evidence Project' is also noted with interest, and the receipt of the accompanying evidence acknowledged with thanks. It is great to hear that the Business Continuity Policy has been reviewed and will soon be approved. Whilst significant progress has been made towards this element, the identification of vital records in organisational Business Continuity Plans is still ongoing. This element will remain at Amber, but The Assessment Team look forward to being update on progress in consecutive PURs.
11. Audit Trail	A	A	A	N.B. The development of this element is tied in to the development of a central service-wide records management structure as explained in	SFRS is currently rolling out the Modern Desktop project and will be creating a new SharePoint environment (see Element 4).	There has been steady progress in developing the components required for an effective audit trail of records. It is important	The SFRS SharePoint project was initiated in 2018 to accomplish two very specific goals. The first goal being to upgrade and migrate our on-premise SharePoint to the M365 cloud environment. The second goal was to take the opportunity to	The Keeper expects an authority's Records Management Plan to show that a

element 4. This will also effect elements 5, and 6.

… SFRS have identified shared drives as an area with little or no audit trail provision: "Electronic systems used by the eight legacy services, prior to their merger into one national service on 1 April 2013, are still used, e.g. shared drives and intranets, although staff are discouraged from adding new material to them. Teams across Scotland now have Office 365 'shared sites', where they can upload and share information with other team members, regardless of their locations. There is currently no standard audit trail mechanism in use across these systems and sites, with no control over records being added, deleted, moved, edited or renamed." Options are currently being explored for solutions to this. It is anticipated that the development of the BCS and the possible implementation of a new EDRMS (see element 4) will remedy this. The Keeper agrees that the implementation of a service-wide electronic records solution should "greatly improve the audit trail functionality" (*Plan* page 53).

SFRS have been candid in identifying that embedding a service wide records management platform is only one of many priorities demanding resources in the service. He agrees that, with an organisation the size of the SFRS, it is inevitable that progress will be made on an incremental basis. The

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The implementation of a main ERMS, such as SharePoint, will greatly improve the audit trail functionality for electronic records.

A draft Standard Abbreviations Guidance document has been created, once live this will aid the use of the existing File Naming Conventions Guidance.
A draft Document Control Guidance document has been created, once live this will aid the use of version control.
These 2 draft documents are currently awaiting progression to SLT for approval to go out for consultation to stakeholders within SFRS.

A draft Corporate Documents Procedure has been started but is in the early stages and will need a lot more work as a task and finish group with members from all 5 directorates is going to be set up to look at the governance process for corporate documents.
A separate draft Critical Documents Procedure for two types of document (Awareness Briefings and Urgent Instructions) has also been started but also has interdependencies which are delaying its progress.
These 2 Procedures will improve the audit trail mechanism for controlled documents.

NEW EVIDENCE:
E193 Standard Abbreviations Guidance (draft)
E194 Document Control Guidance (draft)

UPDATE SEPT 2019:
The ICT Project Manager has recently provided Information Governance with an update regarding the SharePoint project – 'The current position is that SFRS ICT expect to go out to market next financial year for a Corporate Document Management Solution that would connect into Office 365 and SharePoint. The expectation is that Information Governance would feed into the requirements for the solution and the options appraisal.'

The SFRS File Naming Conventions Guidance has recently been reviewed by the Records Management Officer. The current version has been uploaded to the SFRS Intranet. It will be reviewed again in 2 years' time.

UPDATED EVIDENCE:
E100 File Naming Conventions Guidance

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that SFRS know what records they hold, where they are and when they have been disposed of in accordance with the retention schedules. The use of SharePoint will undoubtedly provide some of the tools to enable this to be managed better.

The new File Naming Conventions Guidance is commendably clear and easy to follow. The Naming Conventions themselves are a business decision but these appear very practical and sensible. The use of these conventions should help to avoid unnecessary duplication of records, and combined with version control, should make managing the files more straightforward.

There is clearly good progress in this Element and the PRSA team look forward to hearing more about this in future PURs.

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modernise our customer SharePoint experience and develop a layer of governance around data owners and permissions. The project ran for approximately two years and spanned every department in the Scottish Fire and Rescue Service (SFRS).

Prior to the project, the SFRS were holding SharePoint data from eight legacy services across several spaces. There was data in each of the legacy services' ICT infrastructure and in the M365 cloud. None of this data was harmonised nor was it governed properly on a national scale. Permissions were nested and very difficult to manage. The SharePoint project engaged with every department in the Service and developed a data migration plan to harmonise SFRS SharePoint layouts, permissions and structure. As these engagements took place, data owners were identified. Once identified, all permissions were wiped in the new environment and the data owners were instructed on how to assign and manage permissions properly. The result was a single, streamlined, corporate SharePoint cloud environment with ease of use, well managed data and permission levels.

During the next phase, members of ICT and Information Governance attended a M365 week long training event in December 2021 to support the service moving forward with full adoption and a change management plan. This includes building retention into the M365 environment, business classification and disposal actions to the overall architecture. This is being monitored by our Digital Board who are responsible for providing a strategic and corporate overview of the work of the SFRS in delivery of the Digital Strategy and to report back to the Senior Management Board (SMB) and Strategic Leadership Team (SLT) as necessary.

The Standard Abbreviations Guidance was uploaded to the SFRS intranet on 01/06/2021 for staff reference and its issue announced to all staff. The Records Management Officer now systematically makes a note of any abbreviations she comes across in corporate documents or other aspects of her work and regularly updates the Guidance with any abbreviations not already included and re-issues the document on the intranet. She has also added/updated abbreviations suggested by members of staff.

Document Control Guidance / Corporate Documents Procedure / Critical Documents Procedure:

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complete and accurate representation of all changes that occur in relation to a particular record is maintained. As SFRS is aware, the SharePoint project will have major implications on digital audit trail maintenance.

The creating of Standard Abbreviation Guidance is noted with thanks. Appropriately implemented naming conventions are a key factor when considering the discoverability of records.

It is also good to see that the guidance document suite has been reviewed.

The receipt of the listed evidence is noted with tanks.

As this Element is closely tied up with Elements 4, 5 and 6, the RAG status of Amber will be retained while the SharePoint project is ongoing. We look forward to being updated on further progress.

Keeper requests that he is kept informed of this work as it progresses. The *Plan* states: "SFRS recognise that there is a need for better management of paper records and will investigate the best way to impose an audit trail mechanism on its paper records, so that the location of a record is known at all times. This may be through the use of tools such as markers left in place of a record or a logging out sheet held in each location." The Keeper agrees a log-out or file registry system should be imposed on SFRS hard-copy records. The Keeper can agree this element on an 'improvement model' basis. This means that the authority has identified a gap in provision (lack of audit trail provision in shared drives and for paper records) and has identified solutions to close these gaps. This agreement is conditional upon the Keeper being kept informed of progress. SFRS have committed to doing this in the introduction to the *Plan* (page 8).		After discussion, the Information Governance Manager agreed that we would amend the draft suite of documents. The suite is now: • Document Control Guidance (storage, copy control, version control, hyperlinks & references to other documents) • Document Formatting Guidance (templates and formatting) • Document Processing Guidance (process of quality control, authorisation, consultation, quality assurance by RMO, issue, amendment, review and withdrawal) • Creating Hyperlinks Guidance (creating links to document sections, documents on intranet, documents on Sharepoint and external documents or websites) • Searching iHub Guidance (searching for and linking to documents on intranet) These documents are still being worked on between the Records Management Officer and the Information Governance Manager. The Document Formatting Guidance was identified as an objective this financial year in the Records Management Officer's appraisal (see Element 12) – to 'draft, finalise and issue guidance to staff on formatting documents (including corporate document process, adding hyperlinks, searching iHub) to give authors more responsibility for their documents and to minimise time spent on processing documents.' Once the Records Management Officer started working on the draft, it was felt that the topics of formatting, processing, creating hyperlinks and searching iHub would be best described in separate, shorter documents, rather than one large document. NEW EVIDENCE: E283 M365 Governance SharePoint Online and OneDrive for Business, 03/12/2021 (example presentation from training event) E284 Digital Board Action Log, 10/12/2021 E285 Digital Board, Terms of Reference, 01/06/2021 E267 Standard Abbreviations Guidance V8.0, issued 06/01/2022 E268 Intranet Screenshot – News Item re Issue of Standard Abbreviations Guidance, 02/06/2021	

							E269 Intranet Screenshot – Standard Abbreviations Guidance available to staff	
12. Competency Framework	G	G	G	Update required on any change	Action plans: The SFRS Annual Operating Plan 2018-2019 includes the action, 'Development of associated GDPR policies, procedures, guidance documentation to ensure legal compliance' and states that 'the exercise of proper control and management of personal data is fundamental to ensure, and be able to demonstrate, compliance with the GDPR. Taking a positive approach, and embracing the changes, will improve records management, customer trust and business opportunities'. The Strategic Planning, Performance and Communications Directorate Plan includes actions relating to implementing the recommendations from the RMP, as well as developing GDPR policies, procedures and training, in relation to the Information Asset Register, Breach Procedure, Information Sharing Protocols, e-learning package and Data Protection Impact Assessments. Appraisal process: The RMO's Appraisal Proforma for 2018/19 shows her objectives and development plan for the current year. Training for other staff: Following the introduction of GDPR, further DP training for staff was rolled out, including an e-learning package (see Element 14). NEW EVIDENCE: E176 Annual Operating Plan 2018-2019 E180 RMO Appraisal Proforma 2018-2019 E224 Annual Operating Plan 2018-19 Quarter 3 Progress Report SPPC E225 SPPC Directorate Plan Progress Report 2018-19 Quarter 3 Information Governance UPDATE SEPT 2019: The Information Governance Manager and Records Management Officer are waiting for approval (for funding, etc.) for the RMO to attend the new course, Practitioner Certificate in Scottish Public Sector Records Management, run by infogov.scot (Frank Rankin), tailored to the requirements of the PRSA. Although the first dates in Oct/Nov are now full, there are future dates in Jan/Feb now available.	The SFRS continue to ensure that their Records Management Officer has opportunities for professional development including attendance at relevant IRMS events and support for horizon scanning and peer learning activities. This type of support is essential to ensure that Records Managers maintain their expertise. The proposed training is certainly appropriate as it is being provided by an experienced and well-respected practitioner and the Assessment Team would encourage the use of this excellent opportunity for development if funding permits. The Data Protection training is an effective way of ensuring that all personnel have access to the training they require. This contributes to compliance with the Data Protection Act 2018 and GDPR. SFRS are maintaining their existing good standard of support and development of all staff involved in record-keeping activities.	The Records Management Officer's Appraisal details objectives and development plans for each year. Current awareness: The Records Management Officer's Appraisal Proforma for 2019/20 shows the awareness activities carried out that year, both internal SFRS training and external IRMS and NRS seminars and conferences. In 2020/21 and 2021-22 so far, there were fewer such events. The Records Management Officer's main achievement in 2019/20 and 2020/21 was the award of Practitioner Certificate in Scottish Public Sector Records Management. In January and February 2020, she attended 4 days of theory, discussion and exercises, on 04/08/2020 submitted a portfolio of activities, evidence, reflective practice statements and learning outcomes and on 20/08/2020 was awarded the certificate. This shows not only a personal commitment to current awareness and professional development but also a commitment by SFRS to ensure the Records Management Officer has opportunities for professional development. NEW EVIDENCE: E270 RMO Appraisal Proforma, 2019/20 E271 RMO Appraisal Proforma, 2020/21 E272 RMO Appraisal Proforma, 2021/22 E273 Email from Frank Rankin re Award of Practitioner Certificate, 20/08/2020 E274 RMO Practitioner Certificate in Scottish Public Sector Records Management, 20/08/2020	The Assessment Team thanks you for this update on Records Management Officer's competency framework. The Assessment Team would also like to congratulate them on the attainment of Practitioner Certificate in Scottish Records Management! The evidence provided is acknowledged with thanks.
13. Assessment and Review	G	G	G	Update required on any change	Review of policies, etc.: The draft Corporate Documents Procedure and Critical Documents Procedure will improve the review mechanism for controlled documents (see Element 11). Review of RMP:	The PRSA team welcome the use of this Progress Update Review is one way of ensuring compliance with the statutory requirement to keep the Records	Review of policies, etc.: The Corporate Documents Procedure and Critical Documents Procedure have been redrafted as the Document Processing Guidance (see Element 11). As with other authorities, SFRS staff had to start working from home in March 2020, where possible.	The Assessment Team are grateful for this update on review of RMP and relevant policies, as well as the completion of an

					SFRS received our invitation to submit our Progress Update Review on 11/12/18 to be submitted by 15/03/2019. Internal Audit: The work of the Information Governance department was reviewed by Internal Audit in 2015; the Information Governance Manager provides regular updates to IA on progress and IA submit regular progress reports to the Board's Audit and Risk Assurance Committee. NEW EVIDENCE: E159 Internal Audit Progress Report, presented to ARAC, 05/10/2017 E160 Internal Audit Progress Report, presented to ARAC, 07/12/2017 E161 Internal Audit Progress Report, presented to ARAC, 28/03/2018 E181 Internal Audit Progress Report, presented to ARAC, 14/06/2018 E182 Internal Audit Progress Report, presented to ARAC, 09/10/2018 E195 Internal Audit Progress Report, presented to ARAC,17/01/2019	Management Plan under review. It is positive to hear that the work of the Information Government department has been scrutinised by Internal Audit and that actions including records management actions are reported on regularly.	This led to changes in what we could do and how we could to it, with the limitations of working on a laptop at home. It also led to adjustments to priorities. The Records Management Officer has had to reprioritise her workload, as more of her time is currently taken up with document control, with a suite of internal COVID-19 related documents requiring processing, not only when they are first issued but also when they are regularly updated to keep up with Government guidelines. Review of RMP: SFRS received our invitation to submit our second Progress Update Review on 19/11/2020 to be submitted by 26/02/2021. However, due to other work priorities and interdependencies, SFRS did not submit a PUR in 2021. SFRS received our invitation to submit our next Progress Update Review on 15/11/2021, to be submitted by 28/02/2022. After receiving the NRS' Assessment Report, the SFRS Records Management Plan will be updated and re-issued on the SFRS intranet and website. Internal Audit: The review of the work of the Information Governance department was completed in February 2019. External Audit: In 2021, SFRS were involved in an external review on security, providing evidence and attending interviews so that we can continue to make improvements (see Element 8). NEW EVIDENCE: E275 Email from Internal Audit to Information Governance Manager, 20/02/2019	external security audit, and an internal information governance audit (the receipt of the evidence is noted with thanks). These are all very positive indications of focus on fit-for-purpose plans, policies and practices. The COVID-19 pandemic has inevitably had an impact on the ability of our colleagues complete their usual tasks. A reprioritisation of tasks in a particular role is not unusual; it is good to hear that this has worked out for SFRS. Regular participation in the voluntary Progress Update Review (PUR) process, even when this is not annual, is a good sign that the records management plan is assessed and kept under review.
14. Shared Information	**A**	**A**	**A**	The authority intends to support information sharing practices in SFRS by introducing a service-wide *Information Sharing Policy*. The Keeper has been provided with a draft of this *Policy* and flowchart (version 0.3) and agrees that it properly considers information governance issues. He requires that the final version is forwarded when approved.	The Information Sharing Policy has been re-drafted to take into account GDPR and the Data Protection Act 2018. It will be presented to SLT in early 2019. An Information Asset Register has been developed (see Element 9), which will assist in establishing where an Information Sharing Protocol is in place or is required, with ongoing progress being made to close any gaps. The Data Protection and Information Security e-learning module, including information sharing, was launched on 4 February 2019, with all staff receiving an email informing them it had to be completed by 15	It is important to re-draft the Information Sharing Policy in the light of GDPR and the Data Protection Act 2018. Once this has been approved and submitted as per the Keeper's requirement, it is likely that this Element will move from Amber to Green status.	SFRS are currently reviewing all of our information sharing and information security procedures to allow us to develop a more robust information sharing and information security policy. This is included in our current directorate work plan. SFRS currently have a number of documents and training packages, which all cover information sharing at some level, which we will be pulling together. The ones we are currently reviewing include: Acceptable Use Policy	Thank you for this update on information sharing. It is reassuring to hear that SFRS are consulting ICO's Data Sharing Code of Practice when reviewing key documentation. Staff training on information sharing is also noted with thanks.

				The Keeper can agree this element on an 'improvement model' basis. This means that the authority has identified a gap in provision (the *Information Sharing Policy* is not yet approved) and has identified a solution to close this gap. This agreement is conditional upon the Keeper being kept informed of progress. SFRS have committed to doing this in the introduction to the *Plan* (page 8).	March. A news item was also issued on the Intranet, with it being re-issued regularly to remind staff. The pass rate for the assessment is 80% and training will be monitored to ensure completion. While completing the module, staff must confirm that they have read and understood the Acceptable Use Policy and read the Acceptable Use section in the Information Security Handbook. NEW EVIDENCE: E203 Comms Plan for GDPR Mandatory E-learning E204 Intranet News Item re Launch of E-learning Module, 04/03/2019 E214 Accessing E-learning Module Guidance E221 Email to Staff re Mandatory GDPR Training, 04/02/2019	It is good practice to include training on information sharing as part of data protection and information security training. As with Elements 8 and 9, it is clear that SFRS are ensuring that all personnel are aware of their responsibilities in this Element.	Data Protection Impact Assessment Template and Guidance Data Sharing Agreement Template and Guidance GDPR/Information Security e-learning package Induction Process Information Security Handbook Secure Email Policy and User Guide Recent activities relating to information sharing include: Information Governance uploaded the Data Sharing Agreement List to the intranet for staff reference on 15/04/2021. We are currently working on an update, as part of our annual review. A training presentation was developed and training sessions delivered via Teams to targeted SFRS employees/departments with regular information sharing as part of their role, for example, Occupational Health. Development of Group Mailboxes and Egress accounts attached with access permissions applied for secure sharing and reduced single point of failure. New version of client software rolled out for all Egress Users providing improved software for external secure sharing electronically. Trouble shooting Egress on behalf of SFRS employees with partner agencies following feedback from targeted training sessions. Dedicated inbox for any queries from the attendees of the targeted training sessions and guarantee of prompt responses and resolves where required. Ongoing monitoring of Egress licences and allocation to ensure sharing is carried out securely. Secure Email Account Request Form applied to Service Desk Portal with appropriate workflows for approval and creation by Information Security Officers. NEW EVIDENCE: E276 SFRS Data Sharing Agreement List, as at 15/04/2021 E282 Occupational Health Information Security and Secure Email Presentation, 25/01/2022 E291 ICT Service Desk Portal Screenshot – Secure Email Account Request Form	The evidence provided is acknowledged with thanks. Thank you for letting us know that that the drafting of an overarching Information Sharing Policy is still on the cards while its functions are currently split over a number of policies, templates, and guidance documents. We look forward to hearing how this work progresses in consecutive PURs.

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 23 February 2022. The progress update was submitted by Morag Allan, Records Management Officer.

The progress update submission makes it clear that it is a submission for **Scottish Fire and Rescue Service**.

The Assessment Team has reviewed Scottish Fire and Rescue Service's Progress Update submission and agrees that the proper record management arrangements outlined by the various elements in the authority's plan continue to be properly considered. The Assessment Team commends this authority's efforts to keep its Records Management Plan under review.

<u>General Comments</u>

Scottish Fire and Rescue Service 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 Scottish Fire and Rescue Service continue to take their statutory obligations seriously and are working hard to bring all the elements of their records management arrangements into full compliance with the Act and fulfil the Keeper's expectations.

The Assessment Team recommends authorities consider publishing PUR assessment reports on their websites as an example of continued good practice both within individual authorities and across the sector.

This report follows the Public Records (Scotland) Act Assessment Team's review carried out by

Iida Saarinen

Iida Saarinen
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