

The Public Records (Scotland) Act 2011

Skills Development Scotland

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

23 April 2019

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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 Interim 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 Skills Development Scotland. The outcome of the assessment and relevant feedback can be found under sections 6 – 8.

4. Authority Background

Skills Development Scotland (SDS) is the national skills body supporting the people and businesses of Scotland to develop and apply their skills. SDS was formed in 2008 as a non-departmental public body, bringing together careers, skills, training and funding services. SDS plays a key role in driving the success of Scotland's economic future, working with partners to:

- Support individuals to reach their potential
- Help make skills work for employers
- Improve the skills and learning system.
- SDS is preparing Scotland's workforce to maximise opportunities in today's dynamic world.

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.
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6. Progress Update Review (PUR): Skills Development Scotland

Element	Status of elements under agreed Plan, July 2014	Status of evidence under agreed Plan, July 2014	Progress assessment status, 2018	Keeper's Report Comments on Authority's Plan, July 2014	Self-assessment Update as submitted by the Authority since July 2014	Progress Review Comment, 2018
1. Senior Officer	G	G	G	Update required on any change	No change on this element, the senior officer remains Laura Barjonas, Head of Corporate Office.	No immediate action required. Update required on any future change.
2. Records Manager	G	G	G	Update required on any change	The post and the post-holder have both changed since the submission of the SDS RMP. Kenneth Parker, as the Information Governance Advisor, now has responsibility for records management. Role description for the new post is included as a supporting document for this update	The Keeper's Assessment Team thanks the authority for the update regarding the changes to both the post and the post-holder. Submitted as supporting evidence is the job description for the post of Information Governance Advisor. This clearly describes the roles of the post, including those relating to records management and compliance with the Public Records (Scotland) Act 2011.

3. Policy	G	G	G	The current Policy is aligned with the Records Management Strategy and Improvement Plan which identifies the future actions needed to close gaps in the authority's record management provisions. This Plan is intended to be implemented alongside the move to SharePoint 2010. The Keeper requests that he is kept updated as progress is made in both the Improvement Plan and the project to move to SharePoint 2010.	The RM Policy is being reviewed again, in light of the roll-out of Office 365 and the early lessons learned from that. It will be circulated <i>ex committee</i> to the Information Governance Scrutiny and Improvement Group as the first step in the approval process.	The implementation of Office 365 will undoubtedly affect the records management procedures within the authority and it makes perfect sense to update the Records Management Policy to reflect these changes. The Assessment Team commends the authority for regularly reviewing key policy documents, particularly when systems or procedures change. The Assessment Team requests that the updated Records Management Policy is submitted at the next PUR.
4. Business Classification	A	A	A	A baseline Business Classification Scheme has been submitted which identifies the main record-creating activities and types of records being created across the organisation. The RMP identifies the need for	Each major section of the Business Classification Scheme was agreed and signed off by the relevant Head of Service, with the major record types identified for each area. Subsequently, the structure was created within SharePoint 2010 which was the	The authority's identification of records created in carrying out its business has evolved over time. The Business Classification Scheme (BCS) was used as a structure for records managed within SharePoint 2010 using the IShare platform. Over the last couple of years the authority

				<p>more work to be done to add further categories of records to the BCS.</p> <p>Over time the authority intends to impose the BCS upon the structure provided through the shift to using SharePoint 2010 as an EDRMS.</p> <p>The Keeper can agree this element on an 'improvement model' basis, provided he is supplied with evidence of progress of this project as it continues.</p>	<p>platform for IShare, SDS's EDRMS tool.</p> <p>During FYs 2017-18 and 2018-19 SDS ran a major business change project to move to Office 365. One aspect of this was the re-working of IShare from its previous SP 2010 platform to work on SP Online. During that transition, the BCS for each area was re-validated and again used as the basis for the file plan within the EDRMS.</p> <p>One output of the GDPR Readiness Project (see Element 9) was a revised information asset register (IAR) which, in part, provides details of significant record types held outwith the EDRMS. Ensuring that the IAR remains up to date and complements the information held within the EDRMS will form a significant piece of work within the business as usual activities of the Information Governance and Data Protection teams.</p>	<p>has moved to Office 365 and SharePoint Online and has amended IShare to reflect this. The BCS has been re-validated and continues to act as the file plan for IShare. The Assessment Team commends the recognition of the importance of imposing a structure on records, irrespective of the system used to create and manage them.</p> <p>As part of the work to prepare for GDPR the authority revised its Information Asset Register (IAR). The IAR lists records held outwith the EDRMS. Work is ongoing to ensure that the IAR and BCS complement each other and cover the record types created and managed by the authority. The Assessment Team request that at the next PUR they are sent samples of the BCS and IAR as evidence of progress in this area.</p> <p>If this were a formal re-submission it is anticipated</p>
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						that this Element would remain Amber, reflecting the ongoing work in developing a comprehensive classification of all record types. The Assessment Team commends the work undertaken to date and looks forward to hearing about further progress in future PURs.
5. Retention Schedule	A	A	A	<p>A baseline Retention and Disposal Schedule has been submitted which sets out the actions to be taken against the categories of records created by SDS. The RMP recognises gaps in the retention schedule and throughout 2014-2015 will fill these. Once the Schedule is updated it will be rolled out across the organisation as part of the project to implement SharePoint 2010.</p> <p>The Keeper can agree this element on an</p>	<p>The corporate default of a 4-year retention period followed by deletion has been incorporated into the configuration of the EDRMS – IShare Online. Also included is the capability to apply other values for the retention period if business need requires it. A significant proportion of SDS is working to the default value, while customised values have been applied in other areas (such as Finance and HR). The implementation of the retention periods and automated deletion has been successfully implemented within IShare Online, which is now hosted on SP Online. While successfully</p>	<p>It is clear from the update that a lot of work has been done to standardise and implement retention schedules across the authority. The use of IShare has allowed the more consistent application of retention decisions and has led to the automated deletion of the vast majority of records on the system. A default retention period of 4 years has been applied to the majority of corporate records, but Finance and HR records have been given alternative retention periods. The Assessment Team would like to remind the authority that records such as the minutes of Board meetings and strategy</p>

				<p>'improvement model' basis, provided he is supplied with evidence of progress as the project continues.</p>	<p>tested at low volumes, a remaining technical challenge is to ensure that the system issues notifications at the end of the retention period at the scale required.</p> <p>The move to O365 offers a lot of functionality, with the ability to easily share & co-author material with external partners an obvious potential benefit. The implementation of such external sharing will only be done outside of the EDRMS, so there is an information governance task to ensure that appropriate retention periods are still applied within the SP Online sites being used for the external collaboration.</p> <p>During FY2017-18 SDS ran a GDPR-Readiness project (see Element 9). One output from that work was a set of retention periods (& justifications) for the structured data held in the various enterprise systems. An interesting piece of work will be</p>	<p>documents may have longer term archival interest and appropriate retention periods and actions should be applied to these.</p> <p>The authority has also given consideration to records and information shared externally and the need to apply retention decisions. The Assessment Team commends the authority for this consideration.</p> <p>Work to ensure that the retention schedules for records and information stored on IShare, enterprise systems, in hard copy and also used in sharing sites are all consistent will be undertaken in the following financial year (2019-20). The Assessment Team commends this commitment of time and resources and looks forward to being kept updated on this work in subsequent PURs.</p>
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					<p>done during FY 2019-20 to ensure that the retention periods within the EDRMS, the enterprise systems, the inventory of hardcopy material in off-site storage and the external sharing sites are all consistent.</p> <p>To support staff in determining which retention period they should be applying for a given record type the IG team are producing both a summary and a full retention schedule. These will be 'live' documents and subject to rolling updates during the work to ensure consistent retention periods.</p>	<p>The update describes an initiative to provide staff with a summary retention schedule alongside the full version. This seems to be an effective way to ensure staff uptake and participation in ensuring that retention periods are applied in practice.</p> <p>If this were a formal re-submission it is anticipated that this Element would remain Amber, reflecting the ongoing work to develop and ensure the consistent application of retention schedules.</p>
6. Destruction Arrangements	G	G	G	<p>The Keeper commends the current destruction arrangements and requests updates on the planned centralisation of destruction contracts and the digitisation of some records.</p>	<p>SDS previously had a Retention and Disposal Policy which detailed the destruction process in place for information in all formats, including electronic records held in IShare. While the advice to staff on this subject remains the same, the policy itself has been subsumed into the RM Policy,</p>	<p>The Assessment team notes the incorporation of destruction processes in to the Records Management Policy.</p> <p>The update outlines that paper copies of temporary copies of records are disposed of according to their security classification. This is</p>

					<p>rather than continuing as a distinct policy.</p> <p>Convenience copies of documents are destroyed through one of two routes, depending on their information classification, either sent for recycling in the office waste or placed in 'confidential' waste bins and securely destroyed off-site.</p> <p>SDS completed the process of selecting a single supplier for its hard copy off-site archiving. DataSpace (Scotland), now part of Cube Datastore, won the contract. The destruction of any of the hardcopy material in store will be carried out through them using Highlander International, which is accredited to EN15713. SDS's internal guidance to staff on this topic is currently being revised to take account of these changes.</p> <p>For born-digital records held within IShare Online, the destruction arrangements rely</p>	<p>considered to be best practice.</p> <p>The authority has selected a single supplier for providing off-site storage of its semi-current hard copy records. Destruction of these records is carried out by the supplier and the authority is in the process of updating staff guidance to reflect these changes. The Assessment Team commends the consolidation of semi-current paper records into one location as this should provide greater control over their management and eventual disposal.</p> <p>Electronic records held on the IShare Online system are disposed of after 93 days. Other business systems dispose of these records after different periods. This ensures that deleted electronic records are not kept longer than necessary. The Assessment Team thanks the authority for this update.</p>
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					<p>on how SharePoint Online manages the deletion of files. At the point of deletion, a file remains recoverable by super-users from the system recycle bins (either local or site collection) for 93 days. For a further 14 days after that there is the option to request that Microsoft perform a full site collection restore. This is not a viable option in the vast majority of cases so after 93 days the information will be considered to have been destroyed.</p> <p>The arrangements for information held within the various enterprise systems vary from system to system. Generally, information can be restored from back-up after deletion although the period when that possible varies between systems. This aspect will be explored more fully in the work to ensure that the various retention schedules are consistent (see Element 5).</p>	
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7. Archiving and Transfer	G	A	G	<p>SDS are working on identifying records that may be suitable for long-term preservation and have provided a draft list of records. The Keeper would like to be updated should the list be amended as work continues on finalising the retention schedule.</p> <p>Similar to the destruction of records SDS is looking at centralising its approach to the archiving of records. The Keeper requests that he is kept informed of progress towards this.</p> <p>SDS are working towards establishing a Memorandum of Understanding (MoU) with the National Records of Scotland. The Keeper requests that he is provided with a copy of the MoU once</p>	<p>SDS has completed a tendering exercise in Summer 2017 to bring all of its hard-copy archiving needs within one contract. The successful company was DataSpace (Scotland), which has since (Summer 2018) become part of Cube Datastore. SDS intends to keep operational records at this facility for physical convenience, rather than long term preservation.</p> <p>SDS has yet to finalise a Memorandum of Understanding (MoU) with the NRS for transfer of archival records. Work on this was put on hold by SDS when a key member of the team went on extended family-leave. SDS has recently re-engaged with the NRS team on this.</p> <p>It is expected that the vast majority of the records deemed to be suitable for permanent preservation with the NRS shall be born digital and that of the material in off-site storage with Cube Datastore the majority</p>	<p>The authority has selected a single supplier for providing off-site storage of its semi-current hard copy records. This is an appropriate measure and should allow greater control over the management of these records.</p> <p>The Assessment Team look forward to seeing a finalised MoU with NRS for the identification and transfer of archival records in due course. This will need to include the transfer of born digital records and it is positive to see that SDS are aware of their responsibilities in this area.</p>
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				it is ready to provide evidence that proper arrangements are in place.	are operational records held for audit requirements.	
8. Information Security	G	G	G	The RMP states that information security policies are currently being reviewed. The Keeper commends the regular review of policies and asks that he is provided with updated policies should substantial change occur following these reviews.	Since the 2017 update there have been significant changes in SDS's approach to Cyber Security. A new multi agency (SDS, SE and HIE) Security Council has been established to deliver enhanced Cyber Security practice to all partners. The partners have all also committed to being Scottish Government Cyber Catalysts and becoming exemplars of best Cyber Security practice for the Public Sector. SDS has also been implementing the Scottish Government 'A Cyber Resilience Strategy for Scotland: Public Sector Action Plan 2017-18'. This has involved taking on NCSC Active Cyber Defence measures, sharing intelligence via the Cyber-security Information Sharing Partnership (CISP), and undertaking independent	Working collaboratively with appropriate partners is a sensible and effective way to develop further the existing good practice in information security. Cyber security is undoubtedly challenging for all public authorities and working together enables all partners to benefit from shared experience and improvements. The commitment to being public sector Cyber Catalysts along with achieving ISO 27001 demonstrates a strong and solid approach to ensuring the security of digital information, which is currently the main format used by SDS. This is exemplary work and the Assessment Team would welcome the sharing of these skills and experience with other public authorities.

					<p>assessment of our Cyber controls.</p> <p>SDS has adopted the ISO 27001 standard as best cyber security practice and has aligned its policies and procedures to the standard. Senior management are engaged in oversight and governance bodies are in place. A dedicated Cyber Security team sits within our EIS department to provide assurance and incident response. Additionally, SDS are working towards Cyber Essential plus accreditation in 2019.</p> <p>In preparation for GDPR SDS ran a project to ensure that our response to a data breach incident was compliant with the new legislation. A new Information Asset Register has also been established to support GDPR compliance and the role of DPO has been assigned.</p>	
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					Going into 2019 the EIS Cyber Security team is being expanded to take on additional responsibility for non-EIS delivered systems and to implement an enhanced Security Operations Centre capability.	
9. Data Protection	G	G	G	Update required on any change	From May 2017 to August 2018, SDS carried out a GDPR readiness and implementation project. Highlights of the project's activities include: complete revision of SDS's information asset register; a double opt-in marketing campaign to achieve GDPR compliance and best practice; an update to our policies, privacy notices, registration forms and contracts; an audit and review of key systems; a GDPR training module with 100% staff completion; tailored training provided to staff in high-priority areas of the business; an agreed approach to updating or creating data sharing agreements for all of SDS's contractors and partners; stronger links with external partners and	SDS have approached the changes in data protection requirements pro-actively and have clearly undertaken a comprehensive review of all aspects of the business. The range of training described shows a commitment to ensuring that all staff are aware of these legal requirements. These are now embedded in routine working practices which is to be commended. Continuing development and improvement is clearly also part of normal business practice for SDS in this area. The proposed future plans show that SDS are aware of the need to review and update practice and policy on an on-going basis. The Assessment

				<p>stakeholders as well as a greater cultural awareness within SDS of the importance of Data Protection.</p> <p>Following the conclusion of the GDPR project in August 2018, activity has transitioned to business-as-usual and post-project work with the aim of achieving best practice across the organisation by 2020. Work in this area will largely focus on data sharing, the ability to perform supply chain compliance checks, the integration and collaboration between key internal systems, further tailored training to key colleagues and an ongoing review of the project outputs.</p>	<p>Team welcome this attitude and the very thorough approach that has been adopted, and would be interested to hear of further developments in future PURs.</p>	
10. Business Continuity and Vital Records	G	G	G	<p>The Keeper welcomes SDS' intention to review their Business Continuity Plans after each test, to internally audit compliance with each BCP, and to review their business continuity policies and procedures. The</p>	<p>Some changes and business improvements have occurred since 2014:</p> <p>SDS has adopted 'ClearView' as its business continuity management (BCM) tool. The application supports the entire BCM lifecycle, as identified by industry standards such as ISO</p>	<p>SDS has experienced some live incidents which have tested their Business Continuity systems as well as planned exercises. Learning from these is good practice and the SDS has now developed an extensive framework to deal with business continuity</p>

				<p>Keeper would like to receive updates on these reviews and audits and requests that he is informed should any policies and procedures change.</p>	<p>22301: Impact Analysis, Risk Assessment, Plan Development, Plan Maintenance, Plan Approval, Plan Exercising and Incident Management. Additionally, the SDS Business Continuity Framework has been developed to capture all components of our BC arrangements and overall approach. This includes the updated Incident Management Process, with its Gold, Silver and Bronze sub-processes, which identify the actions based on the assessed business impact (High, Medium and Low) of the incident.</p> <p>Within ClearView, each site and business unit has updated its business continuity plan, in which each identify their vital records, and business impact assessment. These include refreshed values for the RTO (recovery time objective) and RPO (recovery point objective) values for SDS's information systems.</p>	<p>arrangements. The use of ISO 22301 to inform the continued development of the SDS business continuity framework demonstrates that the SDS recognises the value of these standards in leading good practice. It is particularly helpful to hear that the vital records are being identified at an appropriate level for the needs of SDS. The Assessment Team commend the robust development of business continuity plans and would welcome updates in future PURs.</p>
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					Business continuity and disaster recovery planning is complemented by a programme of exercises. In 2016, this involved EIS and its major service suppliers. Since then there have been a number of live incidents and/or exercises, including site closures for a variety of reasons, Wannacry cyber-attack, data breach and epidemic, and future ones are planned. The lessons learned from these live incidents/exercises are fed back into the review of existing BCPs and are used to inform the evolution of the BC processes.	
11. Audit Trail	A	A	A	SDS recognise that audit trail provision is inconsistent within the organisation and will seek to improve this through implementation of the SharePoint 2010 project. SDS have submitted several draft documents showing their commitment to	As mentioned under Element 7, SDS has consolidated its archiving arrangements into one contract. Requests for the deposit or retrieval of hard-copy records are made to the Information Governance Team, who then liaise with the supplier until the task is completed. The email chain is retained to	SDS is working hard towards implementation of an audit trail for its digital records, through the use of an EDRMS. Considerable work has been undertaken on moving unstructured digital files into the EDRMS where they can be managed and subject to an audit trail. There is work still to be done on developing

				<p>bridging the gap in audit trail provision.</p> <p>The Keeper can agree this element of the RMP on 'improvement model' terms, provided that he is kept informed on the development of audit trail functionality as the project to implement SharePoint 2010 progresses. Additionally, he will need to see the above draft documents once they have been approved and implemented.</p>	<p>provide an audit trail for each transaction.</p> <p>Any audit trail of the work behind the creation of the hardcopy records resides with the teams creating them, rather than within the central IG team.</p> <p>SDS is in the final stages (due for completion in the current financial year) of moving from its older SharePoint teamsites and shared drives to having all its unstructured information in the Microsoft Cloud, principally on OneDrive and IShare Online (SharePoint Online). Both those platforms provide information about the version history of files, giving a clear audit trail of who changed content and when the changes were made.</p>	<p>systems to keep track of paper documents but the use of IShare will provide an easier method of tracking changes to documents and ensuring that information can be appropriately audited.</p> <p>At present this Element remains at Amber but there is good progress evident. Once the digital records have all been moved to IShare and equivalent systems and there is a clear system and procedures for tracking paper records then, with supporting evidence, the Assessment Team would expect that this Element would be well on its way to achieving a Green RAG rating.</p>
12. Competency Framework	G	G	G	<p>The Keeper commends efforts by SDS to develop a programme of training through the SDS Academy and to create a Working Group of Records Management</p>	<p>SDS expects different levels of RM-related competency for three groups of staff:</p> <ul style="list-style-type: none"> all staff (who should have an awareness of why RM is important to SDS and how good RM practice can help 	<p>Although it is to be expected that SDS would have an excellent understanding of the different levels of skills and competencies required by staff in relation to their roles, it is nevertheless very encouraging and refreshing to</p>

				<p>Champions. The Keeper would like to hear further news of these endeavours.</p>	<p>them in their day job as well as being able to use the EDRMS appropriately). This level of competency has been achieved through an e-learning module on RM in the SDS Academy as well as through the training, support & guidance on using IShare Online.</p> <ul style="list-style-type: none"> the Records Management Champions (RMCs) are members of staff from other areas of the organisation who have some local records management responsibilities. Previously, their expected competency was focussed solely on the EDRMS, where they were local super-users and had extra training on the use and features of the system. There is an on-going community of practice for the RMCs and they received enhanced training prior to the roll-out of IShare Online. The expectations of the RMC role are being reviewed as part of an organisation-wide 	<p>see this articulated clearly. The emphasis on records management training rather than data protection alone is welcome and demonstrates how aware SDS is of its responsibilities.</p> <p>It is clear that SDS is also aware of the value of measuring itself against standards (as shown in Elements 8 and 9, for example). The development of the RM maturity model is an excellent idea and will enable staff to identify gaps and areas for development. The Assessment Team suggest therefore that it may also be helpful to look at the competency framework provided by the Archives and Records Association. This has a number of competencies for records managers in the Process section.</p> <p>https://www.archives.org.uk/cpd/competency-framework.html</p>
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					<p>assessment of information-related roles and responsibilities (see Element 13).</p> <ul style="list-style-type: none"> the named Records Manager (Element 2) and Information Governance Team are responsible for developing and implementing appropriate RM policies and guidance for SDS as well being subject matter experts on RM, wider information governance topics and the EDRMS. This level of competence has been reached based on previous experience, on-the-job training, self-study and attending relevant CPD, peer and professional networking events, such as those organised by the IRMS. <p>SDS mandates that all staff undertake a minimum of 21 hours of CPD each year, which is tracked through the SDS Academy, so there is an organisational commitment to</p>	<p>This is exemplary work and the Assessment Team would encourage SDS to share their training structure with other public authorities.</p>
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					on-going professional development. Element 13 describes the development of an RM maturity model for SDS. One expected outcome from a self-assessment against that model is an understanding of any gaps in the competency of those groups of staff, particularly the IG team. In turn, that will allow a structured development programme to be put in place, working towards an appropriate accreditation.	
13. Assessment and Review	G	G	G	<p>The Keeper welcomes this authority's commitment to regularly review their records management provisions throughout the organisation and audit the progress they are making against their Improvement Plan.</p> <p>Should the intended internal audits for measuring compliance with the records management</p>	<p>SDS is committed to reviewing progress of on-going work through a variety of approaches.</p> <p>At SDS each service has a work plan which details the intended activities and goals for the year. Progress is reported against these commitments quarterly. For RM, the plan and the on-going reports are reviewed and approved by the Head of Service for Corporate Office (accountable officer named in Element 1), the Director of Finance and</p>	<p>SDS shows commendable commitment to continuous review and development and has systems in place which encourage this. There is planned and well-structured assessment and review built into their business as usual processes. There are appropriate working groups and oversight committees at each level of the organisation. The involvement of the Audit & Risk Committee ensures that this is overseen at a strategic level.</p>

				<p>requirements go ahead in 2015-2016 the Keeper would like to receive updates on the outcome of these. Similarly the Keeper would like to be kept informed if the planned inclusion of compliance with records management policies and procedures within their Business Excellence Approach takes place.</p>	<p>Corporate Governance and the Senior Director for Enabling Services.</p> <p>A regular, six-monthly update of compliance with statutory obligations, including the PR(S)A, is provided by Corporate Office to SDS's Audit & Risk Committee.</p> <p>At SDS, the Information Governance Scrutiny and Improvement Group (IGSIG, successor to the previously reported & described IGLG) has the remit to examine information governance issues across the whole of SDS, including RM policy and implementation. In addition to quarterly reporting to IGSIG there will be an annual 'deep dive' into the subject, which will include scrutiny of the then current policy.</p> <p>Following a self-assessment against the Audit Scotland Best Value IM Toolkit a continuous improvement action plan (CIAP) for information</p>	<p>The use of the Audit Scotland Information Management toolkit to develop a self-assessment is good practice. Using the JISC Records Management Maturity Model is an excellent way to focus on self-assessment and identify future plans. The SDS will be aware that the original maturity model is available on https://www.jisc.ac.uk/guides/records-management/maturity-model This, combined with the internal audit planned for Jan-Feb 2019, will enable the Information Governance Team to plan future development and consolidate much already excellent practice.</p> <p>The use of the Progress Update Review mechanism is very welcome and it is positive to hear that it complements all the other work that is being undertaken in this area.</p> <p>As with Element 12, SDS has a structured approach that</p>
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					<p>governance was developed. The remaining actions are due to be completed by the end of the current financial year and include reviewing the existing IG-related roles and responsibilities across SDS.</p> <p>SDS is at the early stages of developing a RM Maturity Model, based upon the one hosted under the Model Plan Guidance for Element 13. The expectation is to finalise that before the end of the financial year then use that self-assessment and the recommendations from the Internal Audit to inform the future work.</p> <p>There will be an internal audit of records management work conducted in Jan-Feb of 2019. The scope of the audit is to review the policies, procedures and systems in place to ensure the integrity and security of information held by SDS.</p> <p>The opportunity to participate in the annual PUR process offers</p>	<p>has much to commend itself to others, and the Assessment Team would encourage SDS to share its experience with other public authorities.</p>
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					<p>a complementary opportunity for reflection.</p> <p>These review mechanisms concentrate on the detail of policy, either existing or required. The Information Governance team is participating in a number of internal processes which look at service provision, which in turn may well shed light on the impact of existing policies. These processes include</p> <ul style="list-style-type: none"> • <i>A voice of the customer</i> workshop, to be held in Jan 2019 • Business excellence self-assessment, to be conducted in Feb 2019 • The bi-ennial <i>Internal Support Service Survey</i> (ISSS, last ran in 2018) <p>The output from these processes will then be used to inform both the on-going policy work as well as the development of the Corporate Office Continuous</p>	
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					Improvement Action Plan for 2019-20.	
14. Shared Information	G	G	G	Update required on any change	<p>SDS shares information extensively with other public and third sector organisations – local authorities and schools; Scottish and Central Government Depts; as well as charities helping citizens in marginalised or disadvantaged groups overcome barriers to employment.</p> <p>The cornerstone of this sharing is the data sharing agreement (DSA). Each one states what information will be shared between the named parties and what the justification for that sharing is. A key piece of work during the GDPR readiness project was the review of the arrangements for data sharing, bringing the register of data sharing agreements up to date while also reviewing the existing and planned data sharing agreements to ensure that the legal basis for the sharing was documented. This work allowed the data flows across</p>	SDS have ensured that data sharing has been carefully considered during the challenges of changes to data protection requirements and the introduction of new IT systems. It is evident that this work is planned and implemented sensibly and steadily.

				<p>SDS and between SDS and partners to be mapped. A process has been developed to guide the creation of any new DSAs, ensuring the appropriate involvement from data protection staff.</p> <p>The flexibility and improved functionality offered by Office 365 is offering SDS the option of easier collaboration on joint projects with with other public bodies. The information here is more likely to be centred on corporate or project information rather than personal data. Pilot projects for such sharing, using externally-enabled SharePoint sites to replace email communication, are just beginning at the time of writing. The planned governance approach is very much in line with that for the data sharing agreements – to document what is being shared, between which bodies, for what reasons and what the longer retention and disposition arrangements should be.</p>	
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Version

The progress update submission which has been assessed is the one received by the Assessment Team on 18 December 2018. The author of the progress update submission is Kenneth Parker, Information Governance Advisor.

The progress update submission makes it clear that it is a submission for **Skills Development Scotland**.

7. PRSA Assessment Team's Summary

The Assessment Team has reviewed **Skills Development 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.

General Comments

It is clear that Skills Development Scotland (SDS) continues to take its records management obligations seriously and is working to bring all elements into full compliance through careful and thorough planned developments.

The Public Records (Scotland) Act 2011 does not require authorities to provide regular updates against progress. The Keeper, however, encourages such updates and welcomes information about the work that has been accomplished and future plans. SDS is to be particularly commended for the processes and people it has in place to ensure that there is on-going scrutiny of its Records Management Plan. The use of the Records Management Maturity Model and the Audit Scotland Information Management toolkit is a very effective way to conduct regular self-assessments and the impact of this is evident in the work undertaken under each of the Elements in this Progress Review Update.

The provision for professional development of the Records Manager and for all staff is particularly well planned and the requirements for different roles within the authority is clearly understood and supported. SDS is to be commended for its support of staff development in this area.

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. At present the RAG status of each element would be unchanged but the Assessment Team would anticipate that Element 11 (Audit

Trail) will reach Green once planned developments have been completed.

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

8. PRSA Assessment Team's Evaluation

Based on the progress update assessment the Assessment Team considers that **Skills Development 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,



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Robert Fotheringham
Public Records Officer