

**The Public Records (Scotland) Act 2011**

**Caledonian Maritime Assets Limited**

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

**16 December 2022**

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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 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 Caledonian Maritime Assets Limited. The outcome of the assessment and relevant feedback can be found under sections 6 – 8.

#### 4. Authority Background

Caledonian Maritime Assets Limited owns the ferries, ports and harbours and infrastructure necessary for ferry services serving the West coast of Scotland, the Clyde Estuary and the Northern Isles.

They are wholly owned by the Scottish Government with Scottish Ministers the sole shareholders. The Caledonian Maritime Assets Limited Board have an executive management team and supporting staff at headquarters in Port Glasgow.

<http://www.cmassets.co.uk/en/home.html>

#### 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:

<b>G</b>	The Assessment Team agrees this element of an authority's plan.	<b>A</b>	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.	<b>R</b>	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) Template: Caledonian Maritime Assets

Element	Status under agreed Plan 02JUN16	Progress status 22NOV21	Progress status 16DEC22	Keeper's Report Comments on Authority's Plan 02JUN16	Self-assessment Update 28SEP21	Progress Review Comment 22NOV21	Self-assessment Update as submitted by the Authority since 22NOV21	Progress Review Comment 16DEC22
1. Senior Officer	G	G	G	Update required on any change	No change.	Noted with thanks. Update required on any future change.	No change.	Update required on any future change.
2. Records Manager	G	G	G	Update required on any change	No change.	Noted with thanks. Update required on any future change.	No change.	Update required on any future change.
3. Policy	G	G	G	Update required on any change	No change.	Noted with thanks. Update required on any future change.	No change.	Update required on any future change.
4. Business Classification	A	A	A	<p>The new <i>Business Classification Scheme</i> shall be used to inform the roll-out of the authority's EDM project. CMAL also intends to create an <i>Information Asset Register</i> (IAR). The Keeper requests updates on these developments and the receipt of copies of documents including the IAR itself once available.</p> <p>The Keeper agrees this element of the Plan under Improvement Model conditions. This means that the authority has identified a gap in provision (the electronic records management solution is not fully rolled-out to staff) and have taken steps towards closing this gap. The Keeper's agreement is conditional on his being updated as the project progresses and as the improvements outlined in the Action Plan are implemented.</p>	<p>Board approval to progress the project was given in February of 2021.</p> <p>Workshops with representatives of each department continue throughout the EDRMS project. All new developments will be informed by the business classification.</p> <p>We have successfully completed the first process transition to Microsoft 365 by providing a solution that enables staff to request travel bookings and associated needs through a single app interface. This is currently in pilot and will be released to the wider business very soon. We are also 80% through a further project that will provide another app for staff to raise PO requests against CMAL projects and contracts, managing conversations associated and allowing reporting in-line with contract budgets and other associated POs. This phase 1 launch will provide significant benefits over previous methods from both the end user perspective as well as the administrative needs for visibility, data accessibility and management as well as the potential for comprehensive reporting.</p> <p>A PoC is underway with CMAL's partner AMX for a potential replacement of OSMS, to understand whether the appropriate platform is their bespoke solution or instead an app-driven approach within Microsoft 365. Regardless, measures are being</p>	<p>The Keeper's Assessment Team thank CMAL for the detailed update regarding the authority's transition to Microsoft 365. It is positive to hear that progress is being made and it is clear that CMAL are approaching the implementation of O365 with wide-reaching consideration of how this migration will affect their records management practices.</p> <p>The Team understand that CMAL are considering both integrated O365 apps and external solutions for their various business needs and that remaining compliant with records management obligations is clearly a key consideration amid the ongoing discussions.</p> <p>The Team look forward to news of progress in future PURs.</p> <p>This element remains amber while work is ongoing.</p>	<p>The SharePoint O365 project is progressing and is focused on the importance of development of all systems to comply with the records management plan requirements and for appropriate governance to be put in place to realise the benefits of the project. Much of the work is currently focussed on automating compliance tasks which, if implemented correctly, will reduce the resource burden of managing records on staff.</p> <p>Workstreams currently in progress includes (but not limited to)</p> <ul style="list-style-type: none"> <li>• Demo site with corporate structures being reviewed.</li> <li>• Corporate file plan being reviewed and implemented within SharePoint.</li> <li>• Finalising of retention labels for review and sign off. These will automate retention wherever possible.</li> </ul>	<p>The Assessment Team thanks you for providing this update on the O365 project, which will have widespread implications beyond CMAL's business classification arrangements. This is a major endeavour, and it is anticipated that it will take a significant amount of time to bed in properly.</p> <p>It is clear from this update, however, that CMAL are continuing to give careful consideration to the implications of the gradual implementation of the new EDRMs. It appears that commendable progress has been made since the last update as indicated by the workstreams currently in progress.</p> <p>This element remains Amber while work is ongoing. The Team look forward to news of</p>

				<p>discussed and planned to ensure the approach is fully compliant with records management obligations.</p> <p>In addition, we are now initiating discussions with another of CMAL's partners, with regards to the on-going project management methodology that CMAL will work to. Together, we will be incorporating this methodology into the design of future working areas and processes within SharePoint (and other required Microsoft solutions) to standardise working practices to a common working model (including integration, where needed, with other solutions such as the AMX Asset Management platform).</p> <p>A new intranet has been conceptually presented and we are imminently starting a phase of discussions with all relevant areas to design and build a central platform that staff can access for news and updates, as well as key resources from across the business. Each department will look at their SharePoint sites to better understand how we can best rebuild these in the new platform and collaborate with Intelogy on the way forward.</p>		<ul style="list-style-type: none"> <li>• Overarching solution architecture being documented, will include the corporate file structure (once defined) the applications that have been built from a high level design perspective and how RM will underpin the new platform.</li> <li>• Document requirements for assets for AMX solution and how these will integrate with the RM functionality in SharePoint</li> <li>• Discussions continue on the records management requirements for Projects Once current progress has been reviewed, UAT/Go live plans to be agreed.</li> <li>• The RM overview spreadsheet will be updated to encompass all records management components across every workstream to allow for so tracking and will be shared regularly to flag progress.</li> </ul>	progress in future PURs.	
5. Retention Schedule	A	A	A	<p>The current <i>Retention Schedule</i> is being revised in line with legal requirements, best practice, and the authority's completion of the SharePoint development.</p> <p>The Keeper agrees this element of CMAL's Plan on an Improvement Model basis. This means that the authority has identified a gap in provision (the retention schedule is under review) and the Keeper acknowledges that they are implementing processes to close this gap. The Keeper's agreement is conditional on his being alerted when the review of the retention schedule is complete and on his being provided with a copy of the new version as soon as practicable.</p>	<p>Discussions with Quality, Governance &amp; Data Officer, DPO and Intelogy on data cleansing approaches and guidance starting 23/09 in the run up to migrating content from our existing platform to Microsoft 365. Requirement to formalise compliance needs with regards to retention and disposition for content in advance of writing guidance for staff retention. The retention schedules will be reviewed and updated as part of this work with the ultimate goal to automate as many as possible.</p>	<p>The Assessment Team thanks CMAL for the update regarding Element 5.</p> <p>The Team are pleased to hear that CMAL are giving serious thought to issues surrounding retention schedules and destruction arrangements as part of the authority's migration to O365. The Team welcome news that retention schedules will be reviewed and updated as this process continues.</p> <p>The Team look forward to updates in subsequent PURs. This element will remain amber while work is ongoing.</p>	<p>As highlighted above, work is currently being undertaken to implement the schedules within SharePoint and 365 using labels. As part of this work, all retention schedules will be reviewed.</p>	<p>Thank you for this update.</p> <p>This element remains Amber while work to implement the new EDRMs is ongoing. The Team look forward to news of progress in future PURs.</p>
6. Destruction Arrangements	A	A	A	<p>CMAL is in the process of developing corporate procedures for the destruction of electronic records which will coincide with the completion of the SharePoint project. The Keeper will</p>	<p>As above, work in progress with the current project.</p>	<p>Update noted with thanks.</p> <p>The Assessment Team look forward to updates in subsequent PURs.</p>	<p>This work is progressing with the project above</p>	<p>This element remains Amber while work to implement the new EDRMs is ongoing. The Team look forward to</p>

				require a copy of any such procedures when available.  The Keeper can agree this element of CMAL's Plan on Improvement Model terms. This means that he acknowledges that CMAL have identified a gap in their records management provision (an authority-wide system for the destruction of electronic records is lacking), and have put processes in place to close that gap. The Keeper's agreement will be conditional on receiving updates as the project progresses.		This element will remain amber while work is ongoing.		news of progress in future PURs.
7. Archiving and Transfer	G	G	G	Update required on any change	No change.	Noted with thanks. Update required on any future change.	No change although will be revisited on implementation of the SharePoint project.	Noted with thanks. Update required on any future change.
8. Information Security	G	G	G	The Keeper requests that he is sent a copy of the guidance being developed for security in "out-of-office" situations, when available.  If a review and consolidation of information security procedures results in a new <i>Information Security Policy</i> the Keeper will need to be forwarded a copy.	Our IT Manager is currently preparing for our annual renewal of our Cyber Essentials and Cyber Essentials Plus certification audits 2021.  Our offices in Port Glasgow have been refurbished and a new CCTV system is being installed incorporating 7 cameras to offer enhanced security for our IT systems and records as well as to our premises. We are working with our DPO to prepare the Data Protection Impact Assessment for the system going live.  In addition, our new server room is permanently locked and only accessible to the IT Manager, Head of Business Support, CEO and 2 from the Corporate Support Team.	The Team commend CMAL for their continuing commitment towards their information security obligations.  The Keeper's Assessment team note that since CMAL's submission, the authority have successfully renewed their annual Cyber Essentials and Cyber Essentials Plus certification audits for 2021. We see these were issued IASME-CE-028025 on 07/10/21 and IASME-CEP-006046 on 20/10/21, respectively. Cyber Essentials Certificate search - NCSC.GOV.UK. This is commendable.  The Team also thanks CMAL for the update regarding the implementation of the new CCTV system, and for confirming that data protection considerations relating to the installation are being taken into account through the preparation of a Data Protection Impact Assessment.	We have delivered 10 mandatory meta compliance courses for staff over the past year, these being: <ul style="list-style-type: none"> <li>• Phishing Awareness</li> <li>• Cybersecurity Core Concepts</li> <li>• Social Engineering</li> <li>• Social Networks</li> <li>• Social Engineering Course</li> <li>• Malicious Software</li> <li>• Password Safety Course</li> <li>• Physical Security Course</li> <li>• Social Engineering Course</li> </ul> The next tranche of IT compliance training is currently being planned by our IT Manager, this is for refresher and targeted training for new staff.  Our Cyber Essentials Plus audit for 21/22 audit was successful. We are due to start the next renewal process in October.	Thank you very much for this update; it is great to hear that CMAL has been recertified, and continues to hold Cyber Essentials Plus accredited status.  For comments on the training update, see Element 10.  As per an additional update provided 21/10/2022, CMAL has now been recertified as Cyber Essentials Plus accredited, and an email containing evidence to this has been received with thanks.
9. Data Protection	G	G	G	Update required on any change.	We continue to run courses on GDPR compliance for our staff. We have six staff attending Certificate in Data Compliance training in October 2021. This course is delivered by our DPO Liz, Taylor of TKM Consulting.	The Assessment Team acknowledges CMAL's inclusion of the Data Processing Agreement with thanks.  The Team commends CMAL for continuing to take its responsibilities pertaining to data protection seriously.	We have continued to train staff in GDPR compliance in the last 12 months. Key staff such as HR Coordinator (new role) and Deputy Harbour Master	Thank you for this update. The receipt of GDPR Data Processing Agreement has also been received with thanks.

				<p>We are also planning to introduce online training/tutorials on Data protection for our staff to provide refresher training. These will be mandatory for all staff to complete annually. Our IT Manager has recently implemented mandatory online training for phishing and cyber security for all staff.</p> <p>There will be training and tutorials scheduled for all staff on information governance on the back of the overall O365, we continue to have our bi-weekly meeting with the DPO and ad hoc meetings as and when required.</p> <p>A copy of our Data Processing Agreement is within the shared Onedrive folder. Apologies, I believe this was touched upon last year and we forgot to upload to the folder.</p>	<p>We welcome news that staff awareness of data protection issues continues to be bolstered by the ongoing and planned future implementation of mandatory training courses.</p>	<p>(new role) have attended the extended 3 day course with TKM Consulting, this given the sensitivities of their roles. Most other staff have attended the 1 day course. Our next training session is planned for 20<sup>th</sup> &amp; 21 October for three new finance staff.</p> <p>As previously stated, we do plan to extend the meta compliance application to cover GDPR refresher and other training for staff.</p> <p>Training and tutorials will be scheduled for staff on information governance on the back of our overall O365 project.</p> <p>We continue to have our bi-weekly meeting with the DPO and ad hoc meetings as and when required. DPO writes a board paper at least 3 times a year to report on data protection and further compliance information. Quality Governance and Data Officer writes a paper every board meeting (6 times per annum) that has a short brief of data protection, training etc.</p> <p>No changes to the Data Processing Agreement.</p>	<p>It is clear from this update that data protection compliance remains a key consideration for CMAL. Update required on any change.</p> <p>For further comments on training, see Element 10.</p>	
10. Business Continuity and Vital Records	A	G	G	<p>CMAL does not currently have a business continuity plan but has prioritised its development. The Keeper requires a copy of the <i>Continuity Plan</i> which is set for completion by May 2016.</p> <p>The Keeper agrees this element of CMAL's Plan under Improvement Model terms. This means that the authority has identified a gap in their records management provision (they will not have an approved <i>Business Continuity Plan</i> until later in the year) but have put processes in place to close that gap. The Keeper's</p>	<p>The Business Continuity &amp; Disaster Recovery Plan was published to our Quality Management System for staff in late Jan of 2021. See a copy within shared OneDrive folder. This will require updating now that we are getting back to attending the renovated offices in Port Glasgow. This task is noted on our corporate action log.</p>	<p>The Assessment Team thanks CMAL for the update regarding the authority's published Business Continuity and Disaster Recovery Plan, and for providing us with a copy of the document.</p> <p>The Team welcome news that the Plan will be updated as staff return to the offices in Port Glasgow.</p> <p>The publishing of the Plan clearly demonstrates CMAL's commitment to its RM responsibilities relating to business</p>	<p>We have recently been audited by Wiley Bisset, Chartered Accountants on business continuity (August 2022) I have added their initial findings to the folder. The full report is due mid-September, and I would be happy to add the final report to the folder once in receipt.</p> <p>I have also added some further</p>	<p>It is great to hear of this recent external audit. Continuing regular review of business continuity arrangements is also noted with thanks.</p> <p>The Assessment Team also acknowledges the Receipt of CMAL's Business Continuity Plan with thanks. It is</p>



				agreement will be conditional on receiving updates as the project progresses.		continuity and vital records. We thoroughly commend the progress made by CMAL on this element.  If this was a statutory resubmission of CMAL's RMP, it is likely that the RAG status of this element would turn from amber to green.	consideration/examples to the folder for Business Continuity for the Keeper's consideration.  Business Continuity continues to be logged as an inherent, high risk entry on our Key Business Risks matrix. The risk matrix is reviewed by the CMAL Board (6 meetings per annum) and the Audit & Risk Committee (4 meetings per annum) and updated/actioned accordingly.	evident that business continuity arrangements remain high on the Board agenda.  Update required on any future change.
11. Audit Trail	A	A	A	The authority has identified the need to improve audit trail mechanisms and to assist in this they are expanding the functionality of the SharePoint 2013 system they operate.  The Keeper agrees this element of CMAL's Plan under Improvement Model terms. This means that CMAL have identified a gap in their records management provision (there is no business-wide system for tracking records), and have put processes in place to close that gap. The Keeper's agreement will be conditional on receiving updates as the SharePoint project progresses.	Requirements for audit trails will be incorporated into the projects referred to above under the business classification element.	Update noted with thanks.  This element will remain amber while work is ongoing.	Within the existing project plan there is a requirement that functionality will be implemented to provide a full history of how records are managed throughout life cycle. Implementation will require: <ul style="list-style-type: none"> <li>• Application of corporate version control for documents based on a policy</li> <li>• Maintaining audit logs</li> </ul> Audit logs will allow the super user to track a record from the point it is created within SharePoint until its disposal. CMAL also need to develop a policy/procedure to document version control and this is currently work in progress.	The Assessment Team thanks you for this update on future audit trail arrangements. The requirement set within the existing project plan and the steps identified in the implementation process are acknowledged with thanks. These are very appropriate goals to accompany the O365 SharePoint implementation, and show a commitment to improvement.  This element remains Amber while work is ongoing. The Team look forward to news of progress in future PURs.
12. Competency Framework	G	G	G	The Keeper welcomes updates on staff training activities such as the proposed Workshop Session and the inclusion of data protection training as part of the planned information governance training package.	See Element 9.	As CMAL demonstrate in Element 9, the authority clearly continue to support and train staff appropriately. This is particularly evident surrounding issues of data protection and information security.  The Assessment Team welcome news, also noted in Element 9, that CMAL have planned for staff training and	Pls see Elements 8 & 9.	Thank you for the comprehensive update on staff training provision given under Elements 8 and 9. It is evident that CMAL continues to invest in staff records management competencies,

					tutorials on the back of the migration to O365.		especially with regard to data protection and information security.  Update required on any future change.	
13. Assessment and Review	<b>G</b>	<b>G</b>	<b>G</b>	The Keeper commends the authority's plans to undertake annual self-assessments and an audit of their Records Management Plan by the end of 2016. The Keeper requests that he is kept informed of these developments.	As previously stated, CMAL remain committed to undertaking the annual PUR and ensure data protection elements are periodically included in our internal/external audit programmes.	The Keeper's Assessment Team commend CMAL's commitment to undertaking annual PURs as part of the authority's assessment and review process.  The Team also note with thanks that data protection elements are periodically reviewed through both internal and external audit programmes.	No change, happy to undertake the annual PUR as part of assessment and review process.  Internal and external audit programmes are ongoing throughout 2022.	The Assessment Team thanks you for this indication that CMAL intends to continue to participate in the PUR process on an annual basis.
14. Shared Information	<b>A</b>	<b>G</b>	<b>G</b>	Existing procedures will be reviewed and formalised through the implementation of a CMAL data sharing policy. The Keeper would like sight of the subsequent documentation.  The Keeper agrees this element of CMAL's Plan under Improvement Model terms. This means that he acknowledges that the authority has identified a gap in their records management provision (they consider a single data sharing agreement would be a strong business tool) and have put processes in place to close that gap. The Keeper's agreement will be conditional on him being provided with updates as the project progresses.	Please see a copy of our Data Processing Agreement as mentioned in element 9 within the shared Onedrive folder.	The Assessment Team thanks CMAL for the inclusion of a copy of the Data Processing Agreement. CMAL clearly takes the appropriate treatment of shared information seriously and the Team commend the authority for this.	No change for 2022.	Thanks for letting us know that there have been no major changes to this Element. Update required on any future change.

## 7. The Public Records (Scotland) Act Assessment Team's Summary

### Version

The progress update submission which has been assessed is the one received by the Assessment Team on 6<sup>th</sup> September 2022. The progress update was submitted by Victoria McAleese, Quality, Governance & Data Officer.

The progress update submission makes it clear that it is a submission for **Caledonian Maritime Assets**.

The Assessment Team has reviewed Caledonian Maritime Assets' 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.

### General Comments

Caledonian Maritime Assets 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 Caledonian Maritime Assets 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  
Public Records Officer