

GUIDANCE FOR COMPLETION OF THE PROGRESS UPDATE REVIEW (PUR)

National Records of Scotland

Progress Update Review - **Guidance**

This guidance should be consulted by authorities when they are undertaking a self-assessment of their agreed Records Management Plan (RMP).

Contents

Introduction 4

About the Progress Update Review 5-8

Guidance 9-12

Introduction

This Guidance Document is designed to assist authorities, which have produced a Records Management Plan (“RMP”) under the Public Records (Scotland) Act 2011 (“the Act”), to receive feedback on any self-assessment of their agreed RMP through a Progress Update Review (“PUR”).

This guidance has been prepared by the Public Records (Scotland) Act Assessment Team (“the Assessment Team”) within the National Records of Scotland (“NRS”), in collaboration with the Keeper of the Records of Scotland (“the Keeper”) alongside Key Contacts and others from across the public sector. The guidance is not prescriptive, but is designed to be used to assist authorities to engage with the PUR process.

Please note that the Assessment Team will keep the PUR mechanism and this guidance document under review.

If, having consulted this guidance, an authority is still unsure of what is required they should contact the Assessment Team at: public_records@nrscotland.gov.uk

About the Progress Update Review (PUR)

1. Why has a self-assessment review mechanism been introduced through the Progress Update Review (PUR)?

Under the Public Records (Scotland) Act the Keeper may only require a review of an authority's agreed RMP to be undertaken 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 Act does not provide for progress between reviews to be captured or recognised.

Consultation with Key Contacts in the scheduled public authorities highlighted the desirability of a mechanism to facilitate regular, constructive dialogue between stakeholders and the Assessment Team. Many authorities recognised that such regular communication is necessary to keep their agreed plans up-to-date. Following meetings between authorities and the Assessment Team, the development of a reporting mechanism, through which progress and local initiatives can be reviewed and acknowledged by the Assessment Team, was proposed.

The PUR self-assessment reporting mechanism was co-produced and was formally announced in the Keeper's Annual Report published on 12th August 2016. Engaging with the PUR process enables authorities to be credited for the progress they are pursuing and to receive constructive advice concerning on-going developments. This mechanism will not only help agreed plans stay compliant, but will help ensure senior management remain alert to the need for good records management practices. It will also help authorities comply with their statutory obligation to keep their RMP under review.

2. Is the PUR self-assessment mechanism obligatory under the Act?

PRSA requires authorities to keep their records management plans under review*. However, the decision to conduct a self-assessment of an agreed RMP, and to submit details of this for review through the PUR process is wholly at the discretion of the authority. This process is not obligatory under the Act. The evaluation of an authority's PUR submission will be undertaken by the Assessment Team rather than by the Keeper. The PUR assessment reports will therefore only express the opinion of the Assessment Team concerning the submitted updates, and they will not bring about any changes to the status of an authority's RMP as agreed under the Act. Whilst 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, such assessment is made without prejudice to the Keeper's right to adopt a different marking at that stage.

Despite its non-statutory nature, engagement in the PUR process offers several benefits: Not only will named public authorities be commended by the Assessment Team for any improvements reported on, they will also receive helpful, informal advice and support concerning on-going and future records management initiatives. The PUR template provides Key Contacts with a tool for demonstrating to senior managers their achievements and continuing success in improving an authority's record management arrangements. Engaging with the process allows authorities to highlight their records management successes more widely through the publication of the assessment report.

3. How does the PUR self-assessment mechanism work?

The Assessment Team will invite each authority to undertake a self-assessment of their agreed RMP. As part of this invitation process the Key Contact will be issued with a partially completed PUR template, and will be referred to this Guidance Document for assistance. The template reflects the Keeper's Assessment Report of an authority's currently agreed RMP and will refer also to any PURs submitted previously. It also includes a column headed "Self-Assessment Update as Submitted by the Authority Since <Date>". This column allows authorities to detail any changes and progress made since the last update and should be populated by the Key Contact. An example of a PUR template appears at the end of this document.

Upon completion, this template must be returned for the attention of the Assessment Team. Feedback can be expected within two months through a Draft Report which will be sent to the Key Contact. A further month will then be set aside to allow the Key Contact to make representations, after which a PUR Final Report is created by the Assessment Team and sent to the Key Contact. This Final Report will also be published on NRS website. At the same time, the Assessment Team will provide the Key Contact with a letter addressed to the authority's Chief Executive (or equivalent) which can be passed on as the Key Contact thinks appropriate. A diagram of this timeline appears at the end of this document.

4. Can statutory changes to the Keeper's Assessment Report of an authority's agreed RMP take place through the PUR process?

Engagement with the PUR mechanism cannot alter the Keeper's Assessment Report of an authority's agreed RMP or any RAG assessment within it. The Assessment Team will indicate their opinion of any likely changes that might occur if this were a statutory resubmission, including potential RAG status changes. It must be stressed, however, that these assessments are made without prejudice to the Keeper's right to adopt a different marking during a statutory resubmission.

As noted, above, the Keeper may require an authority to review their RMP and make a statutory resubmission once five years have elapsed since the previous agreement*. Alternatively, under the Act, an authority may at any time revise its RMP and submit

the revised plan to the Keeper for agreement. When considering a “revised plan”, the Keeper must assess all of the 15 elements set out in the [Model Records Management Plan](#). The Keeper thus expects that any plan formally submitted reflects the most up-to-date position in relation to each of these elements, and that evidence will be supplied for each of these elements. The resubmission of a RMP for statutory agreement or return should therefore be made separately from the PUR process.

5. When will authorities be invited?

The Assessment Team will invite all public authorities, which have had their RMPs agreed by the Keeper, to complete a PUR template approximately one year after the latest agreement of their RMP and thereafter annually.

A [schedule](#) will be published listing the month when each authority can expect to receive their annual invitation from the Assessment Team. The order of invitation shall be determined primarily by the date on which an authority’s latest RMP was agreed.

The Assessment Team will endeavour to consider each submission in the order shown in the invitation schedule. Early submission of the PUR template from authorities will be acknowledged, but the Assessment Team cannot guarantee that it will be considered until the designated time for assessment as specified in the invitation schedule.

6. What are the benefits of reporting a self-assessment through the PUR Mechanism?

It is anticipated that by encouraging regular dialogue and the provision of updates, a strong sense of collaboration and mutual support will be achieved between authorities and NRS. This will, in turn, promote continuous improvement and help develop a culture of robust records management in the Scottish public sector.

Improvements and innovative developments being implemented by individual authorities will be acknowledged and commended by the Assessment Team. Through the publication of the PUR Final Report on NRS website, these developments will be communicated and their uptake will be encouraged across the wider public sector. This should help facilitate the embedding of a culture of good records management within public authorities in Scotland and demonstrate the commitment of authorities to continuous improvement and accountability.

The submission of PUR templates will allow the Assessment Team to identify where authorities are making progress. Annual updates will ensure any failings are caught early and may encourage senior management to take records management seriously. The process will allow the Keeper to report accurately and regularly to Scottish Ministers on the Act’s implementation and the progress authorities are making under it.

Guidance

The PUR process is intended to be as undemanding as possible. To this end, the PUR template provided to authorities intentionally retains the look and feel of the Keeper's Assessment Report of a RMP. It is designed to be completed by an authority's Key Contact. The three month period assigned by the Assessment Team for completion of the PUR template has been developed through stakeholder meetings and pilot schemes, and has been determined to offer sufficient time for the Key Contact to undertake the self-assessment.

The Key Contact will be sent a template, the layout of which was developed by the Assessment Team in consultation with stakeholders. For each PUR invitation the template will be partially populated by the Assessment Team. A summation of the Keeper's comments on the authority's agreed RMP, and the assigned red, amber, or green (RAG) status of the elements and evidence will be included in the relevant columns. The Key Contact should only populate the column titled "Self-Assessment Update as Submitted by the Authority since <Date>" with information concerning the elements of the agreed RMP. It is expected that authorities focus on those elements awarded an "amber" status when their RMP was agreed, as these are elements identified by the Keeper as requiring action. An example of a PUR template appears at the end of this document.

The template must be returned to the Assessment Team in the format provided. However, Key Contacts responsible for the template's completion are free to adapt and distribute it for internal use within the authority. The Assessment Team hopes that the template will offer Key Contacts a visual means of identifying and highlighting progress to an authority's senior management.

When completing the template, the Assessment Team expects an authority to prioritise updates concerning those elements previously awarded an "amber" status. The submission of updates is not required for elements which were assigned a "green" status where there has been no significant change. However, where provision in relation to an element previously assigned a "green" status has changed, the Assessment Team would require to be informed of this. If these changes result in a weakening of provision, the Assessment Team would expect to be supplied with statements explaining how the authority intends to rectify this. In addition, authorities are welcome to submit updates and comment where further improvements have been made on elements already assigned a "green" status. Such updates will be acknowledged and feedback will be given.

The Assessment Team only requires sight of evidence for elements in which agreement of the element was conditional upon an authority supplying particular documents when they became available. As the PUR process is informal and voluntary, in most cases the Assessment Team will base their response solely on statements provided in the authority's completed template.

If, for whatever reason, the authority has been unable to introduce what it agreed to implement in the last RMP agreed by the Keeper, this should be explained in the PUR submission. Where an authority fails to justify the absence of progress against improvement agreed by the Keeper, or where there are serious signs of deterioration in records management provision, the Assessment Team will notify the Keeper. If the Keeper considers an authority has failed or is failing to comply with its agreed RMP, the Keeper may take action by carrying out a records management review under the Act.

Upon completion of their authority's self-assessment, the Key Contact must return the template to the Assessment Team for review. The final column of the template titled "Progress Review Comment" will be completed by the Assessment Team and a RAG status for each element will be awarded in the "Progress Assessment Status" column. The completed template will form the basis for a Draft Report communicated to the Key Contact.

The Key Contact will have a month from the date of receipt of the Draft Report to make further representations to the Assessment Team. This is an opportunity to engage in further dialogue with the Team to discuss their comments and to submit evidence if necessary. A final version of the report will, shortly thereafter, be created by the Assessment Team. This Report is sent to the Key Contact of the authority and will subsequently be published on NRS website. At the same time, the Assessment Team will provide the Key Contact with a letter addressed to the authority's Chief Executive (or equivalent) which can be passed on as the Key Contact thinks appropriate.

* *Public Records (Scotland) Act 2011 Part 1 Section 5:* <https://www.nrscotland.gov.uk/files/record-keeping/public-records-act/PublicRecordsScotlandActPublished.pdf>

Example page from a PUR Template

Element	Status of elements under agreed Plan 21JUL15	Status of evidence under agreed Plan 21JUL15	Keeper's Report Comments on Authority's Plan 21JUL15	Self-assessment Update <date>	Progress Review Comment <date>
1. Senior Officer	G	G	Update required on any change		
2. Records Manager	G	A	The authority is currently unable to supply a job description or person specific objectives for the individual named in this element. The authority is taking steps to rectify this situation (see Element 12) and should notify the Keeper once these are in place.		
3. Policy	G	G	Update required on any change		
4. Business Classification	A	G	A full information audit is being conducted in order to develop a robust business classification by late 2015. The Keeper commends this decision and the inclusion of different service areas in the development of the business classification. The authority is committed to this action and will inform the Keeper of progress.		

Workflow of PUR Process

