

The Public Records (Scotland) Act 2011

Scottish Futures Trust

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

28th June 2021

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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 Scottish Futures Trust. The outcome of the assessment and relevant feedback can be found under sections 6 – 8.

4. Authority Background

Scottish Futures Trust (SFT) was incorporated and launched in the Scottish Parliament by the Cabinet Secretary for Finance and Sustainable Growth on 10th September 2008. Scottish Futures Trust is a company limited by shares incorporated under the Companies Act 2006 and is wholly owned by the Scottish Ministers although operates independently of the Scottish Government (SG). The shareholder relationship is defined in a Management Statement & Financial Memorandum (MSFM) which is published on Scottish Futures Trust's website. Scottish Futures Trust works closely with the public sector to seek and deliver improved value for taxpayers and has responsibility for delivering value for money across public sector infrastructure investment.

<https://www.scottishfuturestrust.org.uk/>

5. Assessment Process

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

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

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

Key:

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

Element	Status under agreed Plan 01FEB17	Progress status 04JUL20	Progress status 28JUN21	Keeper's Report Comments on Authority's Plan 01FEB17	Self-assessment Update 29MAY20	Progress Review Comment 04JUL20	Self-assessment Update as submitted by the Authority since 04JUL20	Progress Review Comment 28JUN21
1. Senior Officer	G	G	G	Update required on any change.	<p>NRS were advised of the change of our Senior Responsible Officer in September 2019.</p> <p>Evidence Provided: EL01_Evidence_Change of Senior Responsible OfficeSFT</p> <p>This has been updated in our Records Management Policy and Records Management Plan [copies provided under Element 2 and 3].</p>	The Keeper's Assessment Team thanks the Scottish Futures Trust for the update regarding Caroline Whyteside, Corporate Services Director which has been noted.	[SFT May 2021] – no change.	No immediate action required. Update required on any change.
2. Records Manager	G	G	G	Update required on any change.	<p>NRS were advised of the change of surname of the Records Manager in September 2019 under the same correspondence as the change to Senior Responsible Office. See Evidence under Element 1.</p> <p>This has been reflected in our Records Management Policy (copy provided under Element 3) and Records Management Plan. The Records Management Plan was subsequently updated to reflect the evidence submitted for each Element as part of this Progress Update Review in May 2020.</p> <p>EL02_Evidence_SFT Records Management Plan v1.4</p>	<p>The Keeper's Assessment Team thanks the Scottish Futures Trust for the update regarding Wendy Cliffe (now Ross), Office Manager which has been noted.</p> <p>The Assessment Team notes that new Records Management Plan is available and acknowledges that a copy has been supplied. They will store this in order that they may keep the Scottish Futures Trust submission up-to-date.</p>	<p>[SFT May 2021] – The Records Management Plan was reviewed in July 2020 where no changes were required (v1.5) and has since been updated to reflect the evidence submitted for each Element as part of this Progress Update Review in May 2021. Next formal review date updated to May 2022.</p> <p>EL02_Evidence_SFT Records Management Plan v1.6</p>	<p>The Assessment Team notes that there has been no changes to SFT Key Contact. Update required on any change.</p> <p>Thank you for the welcome update regarding Records Management Plan review, as well as the supplied copy of the updated Plan. These have been noted.</p>
3. Policy	G	G	G	Update required on any change.	<p>As stated in Element 1, the Policy was updated to reflect the change in our Senior Responsible Officer.</p> <p>EL03_Evidence_Records Management Policy v1.3</p>	The Assessment Team notes that new Records Management Policy is available and acknowledges that a copy has been supplied. They will store this in order that they may keep the Scottish Futures Trust submission up-to-date.	<p>[SFT May 2021] Records Management Policy was reviewed in line with review date – July 2020. Next review date July 2022</p> <p>EL03_Evidence_SFT Records Management Policy v1.4</p>	The Assessment Team acknowledges the receipt of SFT Records Management Policy and commends the authority for adhering to its regular review schedule.

4. Business Classification	A	A	A	<p>The RMP states that SharePoint has now been implemented across SFT and is being used as a document repository. The Records Management Centre has still to be implemented although SFT has contracted a third party, Brightwire Technology Services Ltd, to implement this solution on SharePoint. The estimated timetable for the completion of this work is given as April 2017. The transfer of records from the current document library will take place with the accompanying metadata and due to the number of records being transferred it is not feasible to add detailed information for these legacy records. Classification of records for addition to the Records Management Centre will take place once this system goes live.</p> <p>The Keeper would remind SFT that SharePoint is not in itself a records management system and for full functionality, particularly relating to ensuring that metadata travels with the record when extracted from the system – for the purposes of archiving electronic records, for example – a records management bolt-on may be required.</p> <p>The Keeper can agree this Element on an 'improvement model' basis. This means that the authority has identified a gap in provision (the electronic systems currently used to create and manage records need to be structured in line with the BCS). The solution and the timescales to close this gap have been identified. The Keeper requests that he is informed once the project has been completed.</p>	<p>SFT's Leadership Team have approved budgetary requirements in 2020/21 FY for a full review of our SharePoint system, where the majority of our records reside. We have now commissioned Blackbird Consultancy to upgrade and migrate our SharePoint site to the modern experience. As each business area is migrated the records for each will be reviewed and appropriate retention applied using O365's Compliance Centre. The Compliance Centre includes Information Governance and Records Management functionality which will allow us to manage and classify business-critical data and automate and simplify the retention requirements for our records.</p> <p>Each Business Area will be assigned an Information Asset Owner (IAO) to work with the Records Manager in the implementation of and ongoing management for Records within their Business Area.</p> <p>EL04_Evidence_LTFeb20_SPtEnhancement</p> <p>SFT have continued to manage the records as documented in the Retention and Destruction Schedule with records which have a retention period defined by legislation being prioritised and automated retention implemented within our SharePoint solution.</p> <p>In September 2019 SFT commissioned Scott Moncrieff to carry out an internal controls review of our Records Management with a scope to look at the Records Management policies, processes, training and awareness and roles and responsibilities at SFT, reviewing current policies compliance with relevant legislation including GDPR, FOI and National Records Scotland</p>	<p>The Assessment Team notes the update regarding the review and migration of the authority's SharePoint system.</p> <p>This is a major undertaking and it seems that the Scottish Futures Trust is moving records one business area at a time. This is sensible. It is also noted that this sort of migration is an ideal opportunity for a data cleanse and it seems that SFT is doing that.</p> <p>The Assessment Team notes that each business area will be allocated an information asset owner to work with the Office Manager in ensuring the RMP is being properly rolled out in their area. The Keeper has previously commended the use of local 'champions' as an effective records management tool.</p> <p>The Assessment Team acknowledges that SFT have provided them with an internal paper explaining the SharePoint upgrade.</p> <p>They also have received a draft version of the new Business Classification Scheme (v2.0 draft). The Assessment Team invite the authority to supply a copy of the approved BCS at the time of their next PUR in order that their submission can be kept up-to-date.</p> <p>It is planned for SFT's Information Governance Group to review and approve the latest version of the Business Classification Scheme when they meet in July 2020, SFT also acknowledge this will be embedded alongside the SharePoint migration project.</p> <p>The adoption of a new SharePoint solution is bound to be incremental and take several years to bed-in properly. The Assessment Team remind the Scottish Futures Trust of the importance of appropriate policies, governance and staff training in making this major project a success. SFT have acknowledged this under element 12 below.</p>	<p>[SFT May 2021] SFT's CEO delegated his area of responsibility to Caroline Whyteside, Corporate Services Director (CW) for the approval of the Business Classification, Retention, Destruction and Asset Register. As part of the Information Governance (IG) group CW along with the other IG members reviewed and approved this document in February 2021. This has still to be shared with the wider SFT staff, as yet this has not formally replaced the previous Retention Schedule.</p> <p>The SP Migration Project is ongoing with significant time spent on the understanding of and planning for implementation of records retention within the Microsoft 365 Compliance Centre. Technical discussion held with Microsoft Experts where retention trigger dates are more complex than date last modified.</p> <p>SFT will be interested in the outcome of NRS discussions with Microsoft and the Internal Advisory Board regarding the Microsoft 365 Compliance Centre capabilities and possible ongoing developments / enhancements for record retention.</p> <p>The role of the Information Asset Owners was discussed at the IG Group where ownership will be assigned to support the understanding and requirements across the workstream areas as they are migrated to modern SharePoint.</p> <p>Document Management has also been highlighted by the</p>	<p>The Assessment Team is grateful for this update on SFT's approach to Business Classification. It appears that the Business Classification, Retention, Destruction and Asset Register is an ambitious and comprehensive register which aspires to cover multiple areas of responsibility. It is positive to hear this document has been approved and that steps can be taken to formally embed the schedule in organisational processes. The Team look forward to hearing on the progress of this in subsequent PURs.</p> <p>Thank you also for the progress update on the SharePoint Migration Project. Implementing records retention within Microsoft 365 can be a challenge due to specific licence requirements, and the PRSA Team at the NRS recognise this challenge, by no means unique to SFT, and are happy to offer guidance as required.</p> <p>The Assessment Team also acknowledges the receipt of staff communications (video and newsletter) with thanks.</p> <p>Business classification arrangements are key to effective information management, and it is clear SFT acknowledges this while taking steps into the right direction. Although this element remains at Amber while</p>
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				<p>as part of the wider control environment.</p> <p>EL04_Evidence_REPT_AUD_J PK-SFT Records Management final</p> <p>Following recommendations from this review and continued development and increased knowledge of the Records Manager, gained during attendance on the Practitioner Certificate in Public Sector Records Management, the Business Classification Scheme is being reviewed and enhanced to allow identification of the location of SFT's Records and a business prioritisation RAG status applied. It is proposed that it be a combined document – The Business Classification, Retention, Destruction and Asset Register. This format will allow us to further engage with each business workstream in identifying Records, Owner, Location, Retention Requirements and Business Priority.</p> <p>There are no extensive strategic changes planned in the records management process within SFT, but as we move to implement records management across the remaining records, the need to classify the records types into categories [Function, Activity, Transaction] will provide a more effective management of them. SFT encloses a copy of this draft document for The Keepers review / comment.</p> <p>EL04_Evidence_Business Classification, Retention, Destruction and Asset Register v2.0_Draft</p> <p>SFT regards this updated BCS as a valuable enhancement to our Records Management Process and a recognition of business priorities and looks to gain internal approval for this version (currently in Draft) by end July 2020.</p>	<p>The Assessment Team looks forward to updates in subsequent PURs.</p> <p>This element remains at Amber while this work is ongoing.</p> <p>For the Scott Moncrieff Review see under element 13.</p>	<p>CEO as remit of IG Group – this is currently at early stages with understanding of the size of Mailboxes and OneDrives being prioritised.</p> <p>Ongoing data cleansing across SharePoint as the SP Migration Project progresses one business area at a time.</p> <p>Project progression – slow, but progressing. Due to requirements for understanding of SharePoint capabilities as well as ongoing COVID restrictions keeping all SFT staff working from home and managing different business priorities. NRS acknowledged this in previous response (“The adoption of a new SharePoint solution is bound to be incremental and take several years to bed-in properly”) Staff engagement has been ongoing with a short video, and communications via the all staff “In The Loop” weekly newsletter.</p> <p>EL04_Evidence_TheSource Migration_SFT.mp4</p> <p>EL04_Evidence_InTheLoopA IStaffCommsSPPProjectupdate</p>	<p>this work is ongoing, the Keeper's Assessment Team recognises SFT's efforts in pursuing full compliance in this element. The Team looks forward to hearing how the projects progress in consecutive PURs.</p>
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5. Retention Schedule	A	G	G	<p>SFT has submitted its current Retention and Destruction Schedule. The schedule identifies the record types, the periods for which these should be retained, the reason for the retention period and any additional information such as the legislative requirements relating to the records. It is currently still 'Draft' as SFT is seeking legal advice on the retention periods for certain financial and company records. SFT have undertaken to send the Keeper the final agreed Schedule when it becomes available.</p> <p>The RMP states that staff awareness sessions will be developed around retention and disposal and that training in the use of retention schedules will be included in future SharePoint training for new staff. The Keeper requests that he is kept informed of the progress in developing this training.</p> <p>The Keeper can agree this Element on an 'Improvement Model' basis. This means that the authority has identified a gap in provision (the lack of an operational retention schedule and the application of this to records managed using SharePoint) and has described how it intends to close this gap. As part of this agreement, the Keeper requests he is sent the finalised Schedule when it becomes operational and is kept informed of the project to apply the retention schedule to SharePoint in the longer term.</p>	<p>SFTs Retention Schedule remains as previously advised / approved. Legislative changes have been applied following a review by Burness Paul LLP in February 2020.</p> <p>EL05_Evidence_SFT Retention Schedule v1.6</p> <p>As detailed in Element 4, SFT are looking to incorporate the Retention Schedule to be part of the Business Classification, Retention, Destruction and Asset Register where the detail as previously approved by The Keeper has been retained with enhancements for Risk and Location included.</p>	<p>The Assessment Team thanks the Scottish Futures Trust for the latest version of their <i>Retention Schedule</i>. This is a recognition that a retention schedule is a 'living document' and will be subject to continual minor change year on year.</p> <p>It is noted that SFT intend to combine the BCS and retention schedule (as well as other aspects of information governance) into a single document. The Keeper has previously expressed an opinion that this sort of arrangements – an Information Asset Register style – is liable to create a stronger business tool for an authority.</p> <p>The Assessment Team is satisfied that future improvement plans do not affect the ability of the organisation to execute retention decisions currently. Therefore, as last year, if this was a formal re-submission it is likely that this element of the Plan would turn from Amber to Green.</p>	<p>[May 2021] Business Classification, Retention, Destruction and Asset Register now approved by IG Group, still to be published / shared with the wider SFT staff. IG group has recognised the need for this to be communicated with additional guidance to ensure understanding and this guidance and communication is to be drafted.</p> <p>EL05_Business Classification, Retention, Destruction and Asset Register v2.1</p>	<p>Thank you for this update on Business Classification, Retention, Destruction and Asset Register approval. The receipt of this register, submitted as evidence, is also acknowledged. This is likely to be a strong business tool, and the Team encourages its active use to inform business practices amongst all staff, as well as regular scheduled review.</p> <p>The Assessment Team is satisfied that SFT is taking its responsibilities seriously in terms of records retention schedule. This element will remain at Green to reflect these efforts.</p>
6. Destruction Arrangements	G	G	G	Update required on any change.	No change. Detail of destruction arrangements remains accurate as previously advised.	No immediate action required. Update required on any future change.	<p>[May2021] Office 365 backups implemented in April 2020 which are automatically deleted after 7 days, which gives us a rolling 7 days backup for everyone for Office 365, includes email, One Drive and SharePoint.</p> <p>EL06_Evidence_LT Paper_Office 365 Data Resiliency</p> <p>Azure servers and the on premise server are on the same basis as Office 365.</p>	<p>The Assessment Team thanks you for this update on record backup destruction arrangements within O365, as well as the arrangements made while members of staff are working from home.</p> <p>The Team also acknowledges the receipt of accompanying evidence with thanks.</p>

								No change in process for destruction of paper files, adhoc collections to avoid build up at home addresses have been arranged when SG guidance allowed.	
7. Archiving and Transfer	G	A	A	Update required on any change.	<p>SFT awaits further guidelines from NRS for the digital transfer of records and is currently holding the required records on the NRS memory stick with a view to delivery to NRS post COVID-19 restrictions.</p> <p>The NRS have advised they have still to sign of the updated MoU and this will be provided to us as soon as possible. On receipt of this SFT will review for signature and return as quickly as possible.</p>	<p>Thank you for this update. Obviously, the Assessment Team is aware that deposits cannot currently be delivered to NRS. The Keeper would agree that SFT is doing as much as possible on this issue.</p> <p>They understand that MoU's are being worked on remotely by the Keeper's Client Managers so hopefully that will be with you soon. Once that has been signed by both parties the RAG status for this element is liable to turn from Amber to Green whether the transfer of digital records has been effected or not.</p>	<p>[May2021] No change in situation since last update due to COVID restrictions still in place.</p>	<p>Thank you for letting us know that no progress has been made due to the COVID-19 restrictions. The Assessment Team encourages the SFT to pursue a Deposit Agreement remotely if at all possible in order to progress this element. The Team looks forward to receiving progress updates in consecutive PURs.</p>	
8. Information Security	G	G	G	<p>SFT has stated that as part of the move to a new IT Managed Service Provider early in 2017 the ICT Policy will be reviewed and updated. SFT has committed to providing the Keeper with an updated version of the Policy as soon as practicably possible, which the Keeper can accept.</p> <p>The Keeper can agree that there are appropriate mechanisms in place to ensure the security of the information created and managed by SFT. As part of this agreement, the Keeper requests that he is sent a copy of the updated ICT Policy when it becomes available.</p>	<p>SFT continues to work towards maintenance of the Cyber Essentials Plus certification which is due for annual accreditation in September 2020</p> <p>The ICT Policy has been updated following the required review date. A copy is included for The Keeper.</p> <p>EL08_Evidence_IT Policy V2.4</p>	<p>The Assessment Team notes that new Information Security Policy is available and acknowledges that a copy has been supplied. They will store this in order that they may keep the SFT submission up-to-date.</p> <p>In their original submission SFT committed to keeping their information governance policies and guidance documents under review and the Assessment Team acknowledges that this is being done.</p> <p>The Assessment Team acknowledge the update regarding Cyber Essentials Plus: Certificate number: 0579668172643670 Certificate level: Cyber Essentials Plus Date issued: 12/09/19</p>	<p>[May2021] IG Group proactively assess and arrange review of all policies, procedures and guidance during their bi-monthly meetings.</p> <p>IT Policy is due for review this month (May 2021) and an updated copy can be provided to the Keeper if required once this is approved.</p> <p>SFT continues to work towards maintenance of the Cyber Essentials Plus certification. During our re-certification preparation a number of areas were identified that had to be addressed before we could re-certify. These were addressed and Cyber Essentials Plus Certification was achieved in March 2021. The certification process between the previous</p>	<p>Thank you for this update on systematic policy review. The IT policy review is also noted with thanks.</p> <p>The active maintenance of the Cyber Essential plus certification is also noted with thanks, as is the accompanying certificate. It is clear and commendable that SFT continues to prioritise information security in all aspects of its operation.</p>	

							certification and current certification has been made much more rigorous, and with a new certifying organisation in place all areas have to be compliant before achieving certification. EL08_Evidence_Cyber Essentials Plus Certificate	
9. Data Protection	G	G	G	<p>...Also submitted as evidence is SFT's draft Data Protection Policy. The Policy is currently going through SFT's internal governance process and is waiting to be signed off by the Leadership Team. SFT has stated that the final agreed version will be sent to the Keeper when it becomes available.</p> <p>The Keeper can agree that SFT is aware of its responsibilities under the Data Protection Act 1998 and has procedures in place to comply with it. As part of this agreement, the Keeper requests that he is sent a copy of the updated Data Protection Policy when it becomes available.</p>	<p>The review and update of the Data Protection policy was previously put on hold pending the appointment of the new Corporate Services Director.</p> <p>The CS Director was appointed in June 2019 and has been reviewing all policies that fall within her area of responsibility and the updated Data Protection Policy V2.2 is now available. A copy is included for The Keeper.</p> <p>EL09_Evidence_Data Protection Policy v2.0</p> <p>An Information Governance Group has also been established with representatives across SFT with responsibility for areas including Data Protection, Freedom of Information, Information Security, Records Management, HR and Board management. The Information Governance group's objective will be 'To provide the necessary ownership and coherent approach to support, co-ordinate, promote and monitor the legislative and regulatory information requirements across SFT'.</p>	<p>The Assessment Team notes that new Data Protection Policy is available and acknowledges that a copy has been supplied. They will store this in order that they may keep the SFT submission up-to-date.</p> <p>As with all other Scottish public authorities the Scottish Futures Trust have been required to review and update their data protection procedures in light of the 2018 legislation.</p> <p>The Assessment Team acknowledges that the public facing SFT website has been updated appropriately: https://www.scottishfuturestrust.org.uk/page/privacy-notice</p>	<p>[May2021] The Data Protection policy continues to be reviewed annually unless legislative changes require this more frequently. Next review due May 2021.</p> <p>A copy of the Data Protection Policy can be provided to the Keeper once the latest review has been approved.</p> <p>Staff are notified of updates to policies via "In The Loop" – the new weekly communication for staff during COVID working from home situation</p> <p>EL09_Evidence_InTheLoopAllStaffComms_Policy_Updates</p>	<p>The Assessment Team thanks SFT for confirming the Data Protection policy continues to be regularly reviewed, as scheduled. The Team assumes that the continuing day-to-day implementation of this policy is embedded in practice and modified accordingly.</p> <p>The Team is also grateful for the attached communications policy update on weekly communications to staff which include policy update notifications, making this accessible to staff currently working from home.</p>
10. Business Continuity and Vital Records	G	G	G	Update required on any change.	<p>This was updated in September 2019 to incorporate contact information where changes have occurred. Following lessons learnt in the recent office closures due to COVID-19 restrictions, and a temporary change in the Business Technology Manager due to maternity leave, this version did not reach approval stage and was returned for these additional</p>	<p>The Assessment Team notes that new Business Continuity Policy is available and acknowledges that a copy has been supplied. They will store this in order that they may keep the SFT submission up-to-date.</p> <p>It is noted that, at time of PUR submission, the Scottish Futures Trust had activated their business continuity arrangements due to the</p>	<p>[May2021] Business Continuity Policy review was delayed due to the onboarding of a new IT Managed Service (ITMS) provider. Time was given to allow them and the IT Manager to review the ICT unavailability plan and ensure emergency procedures and</p>	<p>Thank you for letting the Assessment Team know of the temporary delay to Business Continuity policy review. It appears that SFT has taken the sensible approach to adjust the policy based on the implementation of the new ITMS provider. The Team is contented</p>

				amendments to be incorporated. A copy of this final approved version is included as evidence. EL10_Evidence_Business Continuity Policy V2.2	Covid19 crisis. The Policy has been updated to take account of that. The PRSA Team would be interested in any informal feedback on how the arrangements worked for SFT (no hurry to do this perhaps an objective look-back at the time of the next PUR?)	contacts were inline with their support. V2.3 of the Business Continuity Policy is ready for internal review and approval and a copy can be provided to the Keeper if required once this is approved.	that the authority considers robust business continuity plans a priority for the successful long-term operation of the organisation.	
11. Audit Trail	G	G	G	The RMP states that guidance on version control will be provided to staff in the second half of 2016. The Keeper would welcome sight of this guidance once it has been developed.	No change.	No immediate action required. Update required on any future change.	[May2021] – no change. No immediate action required. Update required on any change.	
12. Competency Framework	G	G	G	Section 7 of the Policy refers to the training of staff in records management issues at induction and on an on-going basis. This training will supplement that given in regard to Data Protection and Freedom of Information. The practical staff training in records management has not yet been finalised and that SFT is waiting for the implementation of the SharePoint Records Management Centre to take place so that the procedures for using this can be incorporated into any training. Discussions are underway with its corporate training provider with a view to developing records management training at induction and as part of a refresher programme. The Keeper requests that he is sent a sample of the training once it has been developed and rolled out. The Keeper can agree that SFT recognises the importance of records management and endeavours to ensure that staff have access to appropriate training. As part of this agreement, the Keeper requests that he is sent a sample of the training when it becomes available.	New members of staff continue to be required to complete the following as part of their Induction. <ul style="list-style-type: none"> Data Protection eLearning module FOI Training Records Management policy and plan. SFT have engaged with our online training provider to purchase licences for a refresher module for GDPR Staff Awareness. This will allow us to check staff's ongoing understanding of GDPR every 2 years. New staff and staff with the need to deal with personal data will continue to complete / refresh the full online training module originally completed by all staff in 2018. Details of this training and evidence of completion by staff will be shared with The Keeper when it is available. Part of our SharePoint Upgrade project will also include training for staff on the best use of SharePoint and the capabilities of O365's Compliance Centre. The Compliance Centre includes Information Governance and Records Management functionality which will allow us to manage and classify business-critical data and automate and simplify the	The Keeper expects to see evidence that Staff creating, or otherwise processing records, are appropriately trained and supported. There seems to be ample evidence that information governance training is appropriately considered in the authority. For example, all staff must complete mandatory data protection training. As part of the SharePoint implementation process it is clear that a staff training exercise is being planned and the PUR makes it clear that this will be a major piece of work for the authority in 2020/21. The Assessment Team acknowledge that they have been sent a sample of staff training communications.	[May2021] – IG Group are addressing document management and awareness for staff across storage areas such as OneDrive and Outlook. Training for SharePoint has mainly focused on support staff (delivered by Blackbird Corporate Ltd) enabling them to provide wider support across the workstreams as part of the migration project with plans to roll out 'just in time' tailored training for all staff on our platform as it is migrated. Information Governance training continues to be required by new members of staff and the IG group have engaged with our lawyers Burness Paull (April 2021) to review and produce a new FOI training session for all staff. A copy of this training package can be shared with the Keeper when it is available / delivered to staff.	The Assessment Team thanks SFT for this update on internal training provision in practical records management matters. It is good to hear that staff members are trained and supported in the day-to-day implementation of the authority's RMP. The Team is satisfied that information governance training in the widest sense continues to be adequately considered within the authority, including training required due to SharePoint implementation.

					<p>retention requirements for identified records.</p> <p>When policies are updated, reference to these are included in All Staff Communications, which recently have been a twice weekly Newsletter – In The Loop.</p> <p>EL12_Evidence_In The Loop Monday 25th May 2020</p>			
13. Assessment and Review	G	G	G	Update required on any change.	No Change.	<p>The Keeper has previously agreed that the authority has appropriate arrangements in place to review the implementation of their records management plan and this PUR confirms that this has not changed.</p> <p>Furthermore, SFT have recently undergone an external audit of aspects of their Information Governance provision and committed to act on the resulting report (see under element 4 above). The Assessment Team acknowledge receipt of a copy of this report.</p>	<p>[May2021] The IG group meet bi-monthly. Records Management is included as one of the standard agenda items. Providing updates to the rest of the IG group and agreement on any further actions or communications as and when necessary.</p> <p>With staff responsible for FOI, Data Protection and Information Security also present within the IG group it is an excellent forum for review and discussion across all RMP related actions.</p>	<p>Thank you for this update on Information Governance Group Meetings which provide a forum for records management discussions. These are no doubt a helpful way to keep RMP and related matters on the table.</p>
14. Shared Information	G	G	G	Update required on any change.	No Change.	No immediate action required. Update required on any future change.	[May2021] no change	No immediate action required. Update required on any 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 the 21st May 2021. The progress update was submitted by Wendy Ross, Office Manager (Corporate Services).

The progress update submission makes it clear that it is a submission for **Scottish Futures Trust**.

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

General Comments

Scottish Futures Trust continues to take its records management obligations seriously and is working to bring all elements into full compliance.

Section 5(2) of the Public Records (Scotland) Act 2011 provides the Keeper of the Records of Scotland (the Keeper) with authority to revisit an agreed plan only after five years has elapsed since the date of agreement. Section 5(6) allows authorities to revise their agreed plan at any time and resubmit this for the Keeper's agreement. The Act does not require authorities to provide regular updates against progress. The Keeper, however, encourages such updates.

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

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

Based on the progress update assessment the Assessment Team considers that Scottish Futures Trust 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



Lida Saarinen
Public Records Support Officer