

The Public Records (Scotland) Act 2011

Scottish Canals

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

10th February 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 Canals. The outcome of the assessment and relevant feedback can be found under sections 6 – 8.

4. Authority Background

The British Waterways Board, operating as Scottish Canals, continues in Scotland as an executive Non Departmental Public Body (NDPB) with effect from 1st April 2020 following the transfer of the functions of the British Waterways Board in England and Wales to the Canal & River Trust on 2nd July 2012. Following the approval of The British Waterways Board (Transfer of Functions) Order 2012 (“the BW Order”) Scottish Canals assumed responsibility and accountability for the Scottish Canal network, and will meet regularly at canal-side locations across Scotland.

Scottish Canals is the operating name of the British Waterways Board.

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:

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| 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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Progress Update Review (PUR) Template: Scottish Canals

| Element | Status of elements under agreed Plan 24AUG17 | Progress status 02APR19 | Progress status 13DEC19 | Progress status 10FEB21 | Keeper's Report Comments on Authority's Plan 24AUG17 | Self-assessment Update 14NOV19 | Progress Review Comment 13DEC19 | Self-assessment Update as submitted by the Authority since 13DEC19 | Progress Review Comment 10FEB21 |
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| 1. Senior Officer | G | G | G | G | Update required on any change. | No change. | No immediate action required. Update required on any future change. | No change. | No immediate action required. Update required on any future change. |
| 2. Records Manager | G | G | G | G | Update required on any change. | No change. | No immediate action required. Update required on any future change. | No change. | No immediate action required. Update required on any future change. |
| 3. Policy | G | G | G | G | Update required on any change. | The Records Management Policy has been refreshed according to its agreed review period, and reissued with minor amendments. | In their original submission Scottish Canals committed to updating relevant policy documents on a regular basis. The Assessment Team appreciates the confirmation that this is being done. | The Records Management Policy has been refreshed according to its agreed review period, and reissued with minor amendments. | In their original submission Scottish Canals committed to keeping their information governance policies and guidance documents under review and the Assessment Team acknowledges once again that this PUR shows evidence that this is being done. |
| 4. Business Classification | A | G | G | G | The RMP states that at present Scottish Canals does not yet have an operational Business Classification Scheme (BCS). The RMP goes on to say that the intention is to create a BCS based on a three level functional model which identifies the functions, activities and transactions which create records. This must remain a business decision for the authority but the Keeper recognises that the functional model is currently considered best practice as it is more resilient to changes within the business, such as restructuring. | The BCS has been refreshed according to its agreed review period, after consultation with Heads of Service, and reissued with minor amendments. | In their original submission Scottish Canals committed to updating relevant policy documents on a regular basis. The Assessment Team appreciates the confirmation that this is being done. The Team also note that the local service areas are being consulted as part of the review of the BCS and this is to be commended (see also element 5 below). | The BCS has been refreshed according to its agreed review period, after consultation with Heads of Service, and reissued with minor amendments. | As with element 3 above, and with the previous PUR, Scottish Canals have shown that they have processes in place to ensure the continual review (and amendment where appropriate) of information governance documents. See element 6 below for comment regarding the Microsoft cloud solution. |

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| | | | | | <p>The work to create a BCS is built into the Records Management Improvement Plan which forms Appendix 3 of the RMP. This has an estimated completion date of July 2017. The Keeper requests that he is kept informed on the progress of this work. He also commends the intention to consult with staff as mentioned in the Improvement Plan as this is likely to lead to a more robust BCS.</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 BCS) and has shown how it intends to close this gap. As part of this agreement, the Keeper requests that he is kept informed on the progress of work to close this gap.</p> | | | | |
| 5. Retention Schedule | A | A | A | A | <p>The work to update the retention schedule is built into the Records Management Improvement Plan and is aligned with the development of the BCS. This work will also be used to identify vital records (see Element 10). Tied in to the work updating the retention schedule will be the development of a retention and disposals policy and procedures. The estimated timescale for the completion for these strands of work is March 2018. The Keeper requests that he is kept informed of progress in this area.</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 up-to-date retention schedule) and has outlined</p> | <p>The business continues to work to the existing retention schedule, which has been incorporated into the Retention & Disposal Policy (see element 6 below).</p> <p>Work has begun on creating guidance and templates based on the BCS for teams to populate with information on the records they create and maintain, and their retention periods (Evidence 001). This information, along with existing sector standards and schedules such as SCARRS, will be used to compile a new records retention schedule for Scottish Canals.</p> | <p>Having established a Business Classification Scheme (see above) Scottish Canals are now working on imposing retention decisions on the record contained in that scheme.</p> <p>This is being done in conjunction with the Information Asset Owners in the relevant business areas. The involvement of local teams in retention decisions is liable to increase engagement with the process and is therefore to be commended.</p> <p>The Assessment Team acknowledges the receipt of</p> | <p>The business continues to work to the existing retention schedule.</p> <p>Work outlined in previous PUR is ongoing but has been delayed during this review period due to resourcing issues and Covid-19 pandemic.</p> | <p>Scottish Canals has a stated intention to use local business areas to review the retention decisions imposed on their information assets. This work has been agreed, and commended, by the Keeper's Assessment Team (see 2019 PUR).</p> <p>Pursuing this objective remains a target for the authority. However, the Team notes that this work has been delayed due to changed priorities in 2020. This is understandable and a rescheduling of records management improvement work has been something of a theme in the Scottish public sector in the last year.</p> <p>The Assessment Team is convinced that Scottish Canals still intends to update their retention decisions and looks forward to updates on this project in subsequent PURs.</p> |

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| | | | | | <p>how it intends to close this gap. This agreement is dependent upon the Keeper being kept informed of progress on the work to close the gap.</p> | | <p>Scottish Canals' <i>Records Retention Schedule Refresh Guidance for Information Owners</i>. This document will be retained in order that the authority's submission can be maintained up-to-date.</p> <p>This element remains at 'amber' for the moment as the work progresses.</p> <p>The Assessment Team commends the commitment of time and resources to this major improvement project. They look forward to being kept updated on this work in subsequent PURs.</p> | | <p>This element remains at Amber while this work is ongoing.</p> <p>See element 6 below for comment regarding the Microsoft cloud solution.</p> |
| 6. Destruction Arrangements | A | A | A | A | <p>One of the recommendations of the RMP states that Scottish Canals intends to extend the provision of secure shredding across all of its sites. The Keeper requests that he is kept updated on this aspect of the RMP.</p> <p>Electronic – The RMP states that, at present, electronic records are not managed or disposed of in a systematic manner and that an Electronic Document and Records Management System (EDRMS) is being considered to impose control on digital records. The Records Management Improvement Plan details the proposed steps involved in the investigation, procurement and rolling-out of an EDRMS with an eventual completion date of 2021. Stage 2 of the phased improvement plan will investigate options for EDRMS solutions as well</p> | <p>The Retention & Disposal Policy and Procedures are now operational (Evidence 002).</p> <p>Regular records appraisals have been undertaken by teams at the records stores and other local storage areas, supervised by the Records Manager (Evidence 003). Teams are regularly reminded and encouraged to appraise electronic information for retention and disposal. The introduction of an EDRMS will obviously greatly help, but there has been no progress on this to date due to resource constraints.</p> | <p>The Assessment Team acknowledge the receipt of their latest <i>Retention and Disposal Policy and Procedures</i> (v1.4). This will be kept on file in order that the authority's submission may be kept up-to-date.</p> <p>The Team also acknowledge that they have had sight of a sample destruction request (which is sent for the central oversight of the Records Manager).</p> <p>This destruction request was for paper records and, as before, it can be agreed that the destruction of paper records has a robust and controlled set of processes in place.</p> | <p>Our executive management team (EMT) has identified digital transformation as a key priority for Scottish Canals. In January 2020 the EMT invited the Scottish Government's Digital Transformation Service (DTS) to conduct a discovery project to identify ways to improve our digital capabilities. The project focussed on customer interactions and interfaces, but also included internal interactions, information and systems. The project concluded in August 2020 and a report was issued highlighting key areas for improvement. One of the key recommendations made by DTS is to fully roll out Microsoft365 to the business, as well as realising the potential of existing systems. A consultant was appointed late September 2020 to head up a Digital Transformation Group (DTG) to take the recommendations of the digital transformation discovery project forward. The Information Management and wider governance and compliance team will work closely with the DTG to ensure our record keeping needs are addressed as part of this project. It is anticipated that MS SharePoint will be deployed to address our records management needs.</p> | <p>The Act requires that public records are destroyed in a timely, controlled and secure manner.</p> <p>The Keeper has previously agreed that Scottish Canals has a robust and controlled set of processes in place to ensure the appropriate destruction of paper records.</p> <p>However, before agreeing this element as compliant, the Keeper would expect to see clear evidence that the controlled, secure and irretrievable destruction of <u>digital</u> records, in line with the authority's retention schedules, has been addressed.</p> <p>It is noted by the Assessment Team that Scottish Canals is intending to adopt the M365 solution for its records management structure going forward. This is a major undertaking and will change the way that digital records are managed including records</p> |

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| | | | | | <p>as alternatives. Once the options appraisal has been completed (July 2019) a decision will be made as to whether to procure and implement an EDRMS or to choose an alternative solution. Scottish Canals has committed to ensuring that the Keeper is kept informed.</p> <p>The Keeper can accept this provided he is regularly informed of progress. Should Scottish Canals decide not to pursue the option of using an EDRMS it will need to outline the way in which it will manage its electronic records, for example, using structured shared drives.</p> <p>... Back-ups – Scottish Canals', quite correctly, routinely backs up its electronic records and systems on a regular basis for business continuity purposes. Scottish Canals states that there is currently no routine destruction of backed up records and information. This has been identified as an action in the Records Management Improvement Plan. The current back-up regime has been outlined in an email from the Head of ICT to the Heads of Service (evidence 013). Nightly incremental back-ups of shared drives, email and databases are taken with a full monthly back-up saved to tape. These tapes are retained indefinitely. The email goes on to outline that from August 2017 ICT will only retain tape back-ups for three months. This will be accompanied by the Records Manager working with business areas to implement the requirements of the retention schedule.</p> | | <p>The destruction of digital records remains an issue in the authority (they are not alone in this) as there appears to be no central control of this aspect of records management.</p> <p>The Keeper has previously agreed that the adoption of an automatic system such as an EDRMS would alleviate this issue (for those records that are created in or transferred into the system). However, Scottish Canals have yet to decide on a suitable digital records management solution.</p> <p>This element remains at amber for the moment. However, Scottish Canals should be aware that should the Keeper require a formal re-submission (as he may do after August 2022) he would expect clear evidence that the controlled, secure and irretrievable destruction of digital records in line with the authority's retention schedules has been addressed.</p> | | <p>destruction, document tracking (see element 11), record recovery (element 10) and possibly the application of retention (element 5) and archiving procedures (element 7).</p> <p>The Assessment Team is pleased to see that "The Information Management and wider governance and compliance team will work closely with the Digital Transformation Group to ensure our record keeping needs are addressed as part of this project." This is vital.</p> <p>Generally a O365 cloud solution is bound to be incremental and take several years to bed-in properly. The Assessment Team remind Scottish Canals of the importance of appropriate policies, governance and staff training in making this major project a success.</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> |
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| | | | | | The Keeper can agree this Element on an 'improvement model' basis. This means that the authority has identified a gap in provision (the ability to systematically delete electronic records and back-ups) and has identified how it intends to close this gap. The Keeper's agreement will be dependent upon being kept informed as work progresses in closing the gap in provision. | | | | |
| 7. Archiving and Transfer | G | G | G | G | <p>The RMP states that Scottish Canals maintains its own semi-current storage facility at West Mains, Grangemouth. In addition, some records are also held at Scottish Canals Headquarters in Glasgow and at the Caledonian Canal Office in Inverness. One of the actions included in the Records Management Improvement Plan is to amalgamate these records and store them in a single purpose built storage facility. The options appraisal for this project is listed as having an estimated completion date of December 2019. The Keeper requests that he is kept informed of the progress of work in this area.</p> <p>Tied in to the project to identify options for a new storage building is the recognition that the cataloguing of semi-current records has been inconsistent and not done to relevant standards. This is confirmed by an assessment that has been carried out into the current state of Scottish Canals' catalogues (evidence 016). Built in to the Records Management Improvement Plan is a commitment to investigate options to</p> | <p>The relocation of the records store to a new facility is still planned, but is not likely to come online this year. The building that will house the stores is currently undergoing the first stages of refurbishment.</p> <p>Transfers of archival records to NRS continues. Three batches of records have been transferred during this review period.</p> | <p>Thank you for this update. The No immediate action required. Update required on any future change.</p> <p>The Keeper's Client Management Team confirm that Scottish Canals deposits records for permanent preservation with NRS under an MoU.</p> | <p>Transfer of archival records to NRS is currently suspended due to the Covid-19 pandemic. We will resume transfers once it is safe and possible to do so. Otherwise, no change.</p> | <p>It is currently impossible for Scottish Canals to transfer physical records to their archive provider (NRS). This is in-line with the situation throughout the sector. The Assessment Team understands that depositing of digital records through Objective Connect is continuing. However, this may not apply to the work Scottish Canals intends to pursue.</p> <p>The Keeper has agreed that Scottish Canals has identified a suitable repository for any public records selected for permanent retention and has a formal agreement with that repository. This is what is required by the Act.</p> <p>Therefore this element remains green despite the temporary suspension of transfer.</p> |

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| | | | | | <p>improve the current level of provision, including the appointment of an archivist and procurement of an Archival Management System. This work also has a proposed completion date of December 2019. Again, the Keeper requests that he is updated as this work moves forward.</p> <p>The Keeper commends the consideration of the construction of a new purpose built facility for the storage of its semi-current records and for the recognition of the need to appropriately catalogue records stored there and the actions identified to achieve this.</p> | | | | |
| 8. Information Security | G | G | G | G | <p>Update required on any change.</p> | <p>A new Information Security Policy is in place. This policy is now owned by Information Management rather than ICT. This change in ownership aims to establish an information security framework for Scottish Canals.</p> | <p>Thank you for this update.</p> <p>The Assessment Team notes that responsibility for information security has changed. If this indicates that information security is now recognised as covering issues beyond technical solutions, this may be considered an improvement in information governance provision.</p> | <p>The Information Security Policy has been refreshed according to its agreed review period, and reissued with minor amendments.</p> <p>Guidance on information security and privacy whilst working from home was created and issued to all staff via email and Yammer at the start of the Covid-19 pandemic lockdown.</p> <p>Information Security training and awareness campaigns continue to be delivered to staff via various channels including email, Yammer, EssentialSkillz and NETconsent.</p> | <p>The Keeper's Assessment Team thanks Scottish Canals for this update which has been noted.</p> <p>In their original submission Scottish Canals committed to keeping their information governance policies and guidance documents under review and the Assessment Team acknowledges that this is being done.</p> <p>No immediate action required. Update required on any future change.</p> |
| 9. Data Protection | G | G | G | G | <p>Update required on any change.</p> | <p>A Clean Desk Policy has been introduced to minimise the risk of data breaches.</p> <p>Data breach identification and reporting awareness training has been delivered to staff via Yammer and NETconsent. Further training on related topics will be devised and delivered this autumn.</p> | <p>The introduction of additional information governance training is welcome and the Assessment Team looks forward to further updates in subsequent PURs.</p> <p>There is further evidence here of Scottish Canals' compliance with the requirements of DP2018/GDPR.</p> | <p>Our suite of data protection policies and procedures are now owned by Information Management and have been refreshed according to their agreed review period, and reissued with amendments.</p> <p>A Record of Processing Activities (ROPA) has been created, and is populated with information on processing activities related to employee data. This will be expanded to all processing activities in due course. An updated employee privacy notice was created from the ROPA and is available to all</p> | <p>The Assessment Team notes that data protection policies and guidance are now the responsibility of the Information Management Team. As the Records Manager is also the Data Protection Officer this makes perfect sense.</p> <p>As with other elements it is clear that Scottish Canals takes the review of relevant documents seriously.</p> |

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| | | | | | | A formal DPIA process is now in place, which is embedded into project workflows and our approval mechanism. | | staff via NETconsent. Staff are now also presented with an updated security and privacy statement upon logging in to the corporate network. A series of training sessions on embedding privacy into projects and the DPIA process is currently being developed for Project managers and will be delivered later this year. Mandatory data protection training continues to be delivered to all staff as standard. | The Assessment Team acknowledges that the Scottish Canals website properly features data protection elements https://www.scottishcanals.co.uk/privacy-policy/ They also note that Scottish Canals are registered as a data controller with the Information Commissioner: Z7148998. |
| 10. Business Continuity and Vital Records | A | A | A | A | <p>The work to identify vital records will form part of the work to develop a BCS/retention schedules. The Records Manager will work with Heads of Service and record owners to identify vital records and these will be included in the Emergency Arrangements and Business Continuity Management Plan. This work is included in the Records Management Improvement Plan and has an estimated completion date of July 2018. The Keeper requests that he is kept informed as this work progresses.</p> <p>The Keeper can agree this Element on an 'Improvement Model' basis. This means that the authority has identified a gap in provision (vital records have not been identified) and has evidenced a commitment to closing this gap. As part of this agreement the Keeper expects to be kept up-to-date with the progress of work.</p> | No change – this is dependent on delivering the revised retention schedule (see element 5 above). | The identification of vital records will occur once the retention schedule is fully rolled out. The Assessment Team assumes that vital records will also be considered by local service areas/business teams. This would be appropriate. As with element 5 above, this element remains at Amber. | No change – this is dependent on delivering the revised retention schedule (see element 5 above). | <p>The identification of vital records will occur once the retention schedule is fully rolled out. This project has been delayed due to competing priorities in 2020. This is understandable and the Assessment Team accepts that the identification of vital records remains an objective for the authority.</p> <p>As with element 5 above, this element remains at Amber.</p> <p>The Assessment Team looks forward to updates in subsequent PURs.</p> <p>Also, see element 6 above for comments around the adoption of the M365 solution for records. This will affect how records are recovered in an emergency.</p> |
| 11. Audit Trail | A | A | A | G | Governance documents such as policies, strategies and standards are all subject to version control, but this doesn't extend further into other records created by Scottish Canals. A sample of the version | A formal records enquiry and retrieval service is now in place (Evidence 004). This provides controlled access to and an audit trail for records located in our centralised records | The Assessment Team acknowledges the receipt of the Scottish Canals' <i>Record Enquiries and Record Retrieval Request Process Guidance for</i> | Guidance on naming conventions and version control, email management, and information storage locations for records has been created and rolled out to staff via NETconsent. An internal communications campaign is being devised to support the guidance materials, and they will also be | The Keeper's original agreement on this element was of an 'improvement plan' model on the understanding that Scottish Canals were to upgrade the document retrieval from their central records store and were to provide instructions to staff on the |

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| | | | | <p>control employed in these documents has been provided (evidence 038). It is anticipated that the introduction of an EDRMS will improve the level of provision in this area. ... Scottish Canals are also investigating the possibility of using a commercial storage provider for its semi-current records. A pilot project will be undertaken using a sample of 200 boxes to measure the feasibility of this option. The Keeper requests that he is kept informed of the results of this pilot and whether it leads to a decision to use the services provided by the commercial provider as this will impact on the RMP.</p> <p>The Keeper can agree this element on an 'improvement model' basis. This means that the authority has identified improvements that can be made in the management of its paper records, in particular the lack of audit trail information for some paper records, and has identified how it intends to close this gap. The Keeper's agreement is dependent upon being kept informed of progress.</p> | <p>store. The process is currently managed by the Records Manager using a database and paper forms (shelf ticket / tracer model). We will investigate barcoding systems in the future with the move to a new storage facility, resource dependant.</p> <p>Progress has been made with the governance documents programme. Guidance and templates have been produced to try to standardise these types of records, including version control (Evidence 005). Supplementary guidance on naming conventions and version control is also in development.</p> | <p><i>Records Management Staff</i> for the central record store (hard copy) and of <i>Governance Documents: Guidance for Authors</i> (naming convention/version control for policy documents). Both these documents represent an improvement in provision and will be retained in order that the authority's submission can be kept up-to-date.</p> <p>However, the authority correctly recognise that in order that all public records, held digitally, can be tracked and identified a standard naming convention/version control policy should be imposed on record creators.</p> <p>There is considerable work going on to achieve this and this is particularly commendable in light of the uncertainty regarding the adoption of an EDRMS or other digital record solution (see under element 6 above).</p> <p>The roll out of any organisation wide solution is likely to be incremental and further time must then be allowed for it to bed in and become fully operational.</p> <p>Thus this element remains at Amber.</p> | <p>referenced in the E-Skillz Records Management training module.</p> <p>See Element 6 for an update on the EDRMS.</p> | <p>correct naming and version control around their digital records. The first of these objectives was attained at the time of the last PUR (2019) and the second has also now been completed (although the Assessment Team notes that there is an supporting 'communication campaign' being devised).</p> <p>The naming convention/version control guidance marks a measurable improvement in the records management provision in the authority.</p> <p>If this was a formal re-submission it is likely that this element of the Plan would turn from Amber to Green.</p> <p>However, the transition to M365 will change the audit trail structure (version control should be automated for example). See element 6 above for comments around the adoption of the M365 solution for records.</p> |
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| | | | | | | | The Assessment Team looks forward to being kept updated on this work in subsequent PURs. | | |
| 12. Competency Framework | A | A | G | G | <p>The RMP states that a training programme in records management will be developed in partnership with the HR department to promote good records management practice across the organisation. The use of Scottish Canals' current online training system O-LAS to deliver online records management training will be investigated and a screenshot from the system has been provided (evidence 049). A suite of guidance documentation and materials will also be produced. Training will be available to new starts on induction and refresher sessions delivered on an on-going basis. The Records Management Improvement Plan gives an estimated completion date of June 2018. The Keeper requests that he is kept informed of the progress of the development of 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 records management training for staff) and has identified a commitment to closing this gap. As part of his agreement, the Keeper request that he is kept informed of the progress of work in closing this gap.</p> | <p>The records management training module is now live (Evidence 006). It is mandatory for all support service and administrative staff and forms part of HR's new starter induction programme. We aim to roll this out to all staff in due course.</p> <p>The Records Manager continues to attend professional sector events, conferences, webinars, and other training events as part of their ongoing commitment to CPD.</p> | <p>As promised, Scottish Canals have instigated mandatory records management training for all relevant staff.</p> <p>This is a very clear improvement in provision and to be thoroughly commended.</p> <p>It is likely that, if this were a formal re-submission, this element of the authority's plan would be upgraded from Amber to Green.</p> <p>The Assessment Team is pleased to acknowledge that the authority has shared a screen-shot of the first page of the 'Introduction to Records Management' course in evidence.</p> | <p>The records management training module has been rolled out to staff and will be refreshed to include reference to records management guidance materials mentioned under Element 11 above.</p> <p>The Records Manager continues to attend professional sector events, conferences, webinars, and other training events as part of their ongoing commitment to CPD. This has continued during the Covid-19 pandemic lockdown via online training and webinars.</p> | <p>It has been shown in other elements that Scottish Canals takes the review of relevant documents seriously. This applies also to training modules and the Assessment Team welcomes this update.</p> <p>As with the last PUR, if this was a formal re-submission it is likely that this element of the Plan would turn from Amber to Green.</p> |
| 13. Assessment and Review | G | G | G | G | Update required on any change. | A PUR was submitted last year to assess progress with our Records Management Plan for the period Aug 2017 to Aug 2018. | The submission of this PUR along with the internal audit review demonstrates that Scottish Canals are compliant with | A PUR was submitted last year to assess progress with our Records Management Plan for the period Aug 2018 to Aug 2019. | The Assessment Team thanks Scottish Canals for the update regarding the Compliance Management Forum. They note that The Records Management and Data |

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| | | | | | | the statutory requirement to keep their Records Management Plan under review. | Scottish Canals has undergone a governance review during this assessment period as part of our change of status to Non Departmental Public Body (NDPB), which came into effect April 2020. As part of this change, a Compliance Management Forum has been established to monitor and improve compliance across the business. The Compliance Management Forum reports to the Business Delivery Committee, chaired by the Chief Operating Officer, who reports to the Executive Management Team. The Records Management and Data Protection Working Groups have been incorporated into the Compliance Management Forum. | Protection Working Groups have been incorporated into this group. | |
| 14. Shared Information | G | G | G | G | Update required on any change. | No change. | No immediate action required. Update required on any future change. | No change. | No immediate action required. 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 20th October 2020. The progress update was submitted by Angharad Stockwell, Records Manager and Data Protection Officer.

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

The Assessment Team has reviewed Scottish Canals' 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 Canals 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.

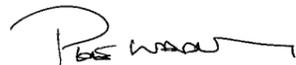
The Keeper cannot change the status of elements formally agreed under a voluntary submission, but he can use such submissions to indicate how he might now regard this status should the authority choose to resubmit its plan under section (5)(6) of the Act.

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

Based on the progress update assessment the Assessment Team considers that Scottish Canals 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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Pete Wadley
Public Records Officer