

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

**Scottish Futures Trust**

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

**29<sup>th</sup> September 2022**

**Contents**

1. The Public Records (Scotland) Act 2011.....	3
2. Progress Update Review (PUR) Mechanism.....	3
3. Executive Summary.....	3
4. Authority Background.....	4
5. Assessment Process.....	4
6. Records Management Plan Elements Checklist and PUR Assessment.....	5-12
7. The Public Records (Scotland) Act Assessment Team’s Summary.....	13
8. The Public Records (Scotland) Act Assessment Team’s Evaluation.....	14

## 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:

<b>G</b>	The Assessment Team agrees this element of an authority's plan.	<b>A</b>	The Assessment Team agrees this element of an authority's progress update submission as an 'improvement model'. This means that they are convinced of the authority's commitment to closing a gap in provision. They will request that they are updated as work on this element progresses.	<b>R</b>	There is a serious gap in provision for this element with no clear explanation of how this will be addressed. The Assessment Team may choose to notify the Keeper on this basis.
----------	---	----------	---	----------	--

## 6. Progress Update Review (PUR) Template: Scottish Futures Trust

Element	Status under agreed Plan 01FEB17	Progress status 04JUL20	Progress status 29SEP22	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 29SEP22
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:  <a href="#">EL01_Evidence_Change of Senior Responsible OfficeSFT</a></p> <p>This has been updated in our Records Management Policy and Records Management Plan [copies provided under Element 2 and 3]</p>	<p>The Keeper's Assessment Team thanks the Scottish Futures Trust for the update regarding Caroline Whyteside, Corporate Services Director which has been noted.</p>	<p>Since our last update job titles have changed to reflect some minor changes in responsibilities and structure within SFT.</p> <p>Caroline Whyteside the Senior Officer Responsible' s job title is now Director – Corporate Services &amp; Investments</p> <p>Wendy Ross the Records Manager's job title is now Information &amp; Business Support Manager</p> <p>These have been updated in the Records Management Plan and are enclosed as Evidence for Element 1 and 2.</p> <p><a href="#">EL_01_Evidence_Records Management Plan v1.7</a></p>	<p>The Assessment Team thanks you for this update which has been noted.</p> <p>Thank you also for providing the Team with the updated Records Management Plan.</p>
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><a href="#">EL02_Evidence_SFT Records Management Plan v1.4</a></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>See Element 1 for details of change.</p>	Update required on any change.
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><a href="#">EL03_Evidence_Records Management Policy v1.3</a></p>	<p>The Assessment Team notes that new Records Management Policy is available and acknowledges that a copy has been supplied. They will store this</p>	No change.	Update required on any change.

						in order that they may keep the Scottish Futures Trust submission up-to-date.		
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</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. 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><a href="#">EL04_Evidence_LTFeb20_SPtEnhancement</a></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 as part of the wider control environment.</p> <p><a href="#">EL04_Evidence_REPT_AUD_JPK-SFT Records Management final</a></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</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 SharePoint migration of data from Classic to Modern SharePoint, is due for completion by the 31<sup>st</sup> May 2022. Following that a strategy for SharePoint will be presented to the SFT Leadership Team in July 2022. This strategy is expected to include ongoing implementation of IAO's (Information Asset Owners), knowledge share, training and review of all business areas on the SharePoint site.</p> <p>The Information Governance group approved the Business Classification, Retention, Destruction and Asset Register in November 2021. A copy is provided as Evidence under this element, however due to the extension to the SharePoint Migration project to end May 2022, this will be reviewed in line with that deadline rather than February 2022.</p> <p><a href="#">EL04_Evidence_Business Classification, Retention, Destruction and Asset Register v2.1_Nov2021</a></p>	<p>The Assessment Team thanks you for this update on Modern SharePoint migration completion. This is positive news, and it is hoped that the new SharePoint Strategy will further embed the new records management suite into SFT's day-to-day business operations.</p> <p>Thank you also for providing the Team with SFT's Business Classification, Retention, Destruction and Asset Register v2.1. The receipt of this has been noted with thanks.</p> <p>This Element remains at Amber while this work is ongoing. The Assessment Team looks forward to updates in subsequent PURs.</p>



				<p>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>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><a href="#">EL04_Evidence_Business Classification, Retention, Destruction and Asset Register v2.0_Draft</a></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 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>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>		
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</p>	<p>SFT's Retention Schedule remains as previously advised / approved. Legislative changes have been applied following a review by Burness Paul LLP in February 2020.</p> <p><a href="#">EL05_Evidence_SFT Retention Schedule v1.6</a></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>As noted under Element 4, the review of the Business Classification, Retention, Destruction and Asset Register will now be carried out in line with the SharePoint Migration project.</p> <p>SFT's Information Governance group are reviewing Best Practice for use of our storage space in SFT:</p> <p><a href="#">EL05_Evidence_ODSPbestpractice_LT_Nov2021</a></p> <p>On completion of the SharePoint Migration project the recommendations will be scheduled for implementation to allow us to achieve a consistent and secure use of our electronic storage spaces across Microsoft Office 365.</p>	<p>Many thanks for this update on retention arrangements.</p> <p>It is noted that the document detailing business classification, information assets, retention, and destruction will be regularly reviewed (this has been provided under Element 4). Thank you also for sharing the 'Best Practice for use of our storage space in SFT' document as an example of best practice, and how best practice is communicated to staff.</p> <p>Based on this update, it is clear that SFT has given consideration to retention decisions and their practical implementation in its ongoing embedding of modern SharePoint.</p>

				<p>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>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>		
6. Destruction Arrangements	<b>G</b>	<b>G</b>	<b>G</b>	<p>Update required on any change.</p>	<p>No change. Detail of destruction arrangements remains accurate as previously advised.</p>	<p>No immediate action required. Update required on any future change.</p>	<p>SFT have recently changed the provider of our Backups for the SFT Office 365 tenant (full Office365 suite) from CyberFort to SkyKick. SkyKick provide an immutable (cannot be altered) backup of the SFT Office tenant (Outlook, SharePoint, OneDrive, Teams). The data will be retained in a UK West Microsoft cloud location for one year, after which it will be destroyed.</p> <p><a href="#">EL06_Evidence_Skykick Backup Information</a></p>	<p>Thank you for this update on new backup provider arrangements, and the accompanying document, which have been noted. Update required on any future change.</p>
7. Archiving and Transfer	<b>G</b>	<b>A</b>	<b>A</b>	<p>Update required on any change.</p>	<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</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>SFT have been working with the NRS on the New Agreement documentation. Communication is ongoing to reach agreement on the final wording of this documentation.</p> <p><a href="#">EL07_Evidence_Hard Drive for NRS</a></p>	<p>It is reassuring to hear that discussions are ongoing regarding the final wording of the Deposit Agreement with NRS' Client Management Team.</p> <p>As deposits cannot currently be delivered to NRS, this Element will remain at Amber. It is clear,</p>



				receipt of this SFT will review for signature and return as quickly as possible.	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.	Once finalised this will be signed and documents transferred for archiving as per the Business Classification, Retention, Destruction and Asset Register.	however, from the update and evidence provided, that SFT is making commendable progress in rectifying this matter.	
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><a href="#">EL08_Evidence_IT Policy V2.4</a></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>SFT has retained Cyber Essentials Plus Certification in April 2022, copy of Certificate is included as evidence</p> <p><a href="#">EL08_Evidence_CE Plus Certificate2022</a></p> <p>Due to the implementation of Cloud First programme, the decision has been taken to delay the review of the ICT Policy once this is completed later in 2022. A copy of the updated ICT Policy can be made available for The Keeper as soon as this is approved.</p>	<p>Many kind thanks for providing the Assessment Team with a copy of SFT's Cyber Essential Plus Certificate. This has been noted.</p> <p>The Assessment Team also thank you for the update regarding planned ICT Policy review. The delay, in this case, seems justifiable. We look forward to receiving the updated document when it becomes available, possibly included in the next PUR.</p>
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</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><a href="#">EL09_Evidence_Data Protection Policy v2.0</a></p> <p>An Information Governance Group has also been established with representatives across SFT with responsibility for areas including Data</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</p>	<p>The review and update of the Data Protection Policy was completed in May 2021:</p> <p><a href="#">EL09_Evidence_Data Protection Policy v3.0.</a></p> <p>The next annual review is currently underway and an updated copy can be provided to The Keeper once this has been approved.</p> <p>We continue to communicate with staff regarding all Policy updates, a copy of an All staff</p>	<p>The Assessment Team thanks you for this update on Data Protection Policy document review and update.</p> <p>The receipt of this policy, and staff communication excerpt, is also acknowledged with thanks.</p>

				part of this agreement, the Keeper requests that he is sent a copy of the updated Data Protection Policy when it becomes available.	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'.	facing SFT website has been updated appropriately: <a href="https://www.scottishfuturestrust.org.uk/page/privacy-notice">https://www.scottishfuturestrust.org.uk/page/privacy-notice</a>	communication is included as evidence.  <a href="#">EL09_Evidence_AllStaffCommunication_In the Loop – Monday 15 November 2021</a>	
10. Business Continuity and Vital Records	G	G	G	Update required on any change.	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 amendments to be incorporated. A copy of this final approved version is included as evidence.  <a href="#">EL10_Evidence_Business Continuity Policy V2.2</a>	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.  It is noted that, at time of PUR submission, the Scottish Futures Trust had activated their business continuity arrangements due to the 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?)	The Business Continuity Policy was updated and approved in October 2021, a copy is included as Evidence.  <a href="#">EL10_Evidence_Business Continuity Plan_v2.4_FinalAllStaff_Oct21</a>  The review and updates followed an Internal Audit carried out on our IT Service Continuity Management, Disaster Recovery and Business Continuity Planning where recommendations were made. Alongside recommendations, key stakeholders and other contact details were reviewed for accuracy.  A copy of the Internal Auditors recommendations document is included as evidence  <a href="#">EL10_Evidence_IT Service Cont Mgmt Disaster Recovery (DR) Business Continuity Planning (BCP)</a>  SFT will consider The Keepers request for feedback on Business Continuity arrangements during the COVID pandemic now that all restrictions have been lifted and provide in a separate document.	Thank you for this update on business continuity and vital records, including the scheduled review of key documentation. The update provided on an Internal Audit is also positive news, and will positively impact SFT's overall disaster preparedness.  The Assessment Team notes that new Business Continuity Policy and the document detailing Internal Audit recommendations are available, and acknowledges with thanks that copies have been supplied.  Should SFT still wish to probe the Keeper's Assessment Team with evidence regarding arrangements during the COVID-19 pandemic, we are happy to receive these alongside the next PUR.
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.	SFT recognises the importance of maintaining accurate records both onsite and in offsite archive. During the COVID pandemic the regular review of paper storage both onsite and offsite have been delayed. An objective has been agreed to ensure all paper	The Keeper expects authority's RMP to provide evidence that a complete and accurate representation of all changes that occur in relation to a particular record is maintained. The Assessment Team is happy to hear that audit train information

						<p>storage files are reviewed during 2022/23 and updates, reviews and destructions will be recorded and brought up to date.</p> <p><a href="#">EL11_Evidence_ScreenshotHRP PDSsystem_Objective2022-23</a></p>	<p>with regard to paper storage is due to be reviewed. Thank you also for providing an excerpt of a planned business objective.</p> <p>With the establishment of the modern SharePoint environment, audit trail information with regard to digital records will hopefully become easier to establish and maintain. It is acknowledged that this may take time to get bedded in properly, and the Assessment Team encourage SFT to make sure this Element is adequately catered for following the reported record migration to modern SharePoint.</p> <p>Update required on any change.</p>	
12. Competency Framework	G	G	G	<p>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.</p> <p>The Keeper can agree that SFT recognises the importance of records management and endeavours to ensure that</p>	<p>New members of staff continue to be required to complete the following as part of their Induction.</p> <ul style="list-style-type: none"> <li>Data Protection eLearning module</li> <li>FOI Training</li> <li>Records Management policy and plan.</li> </ul> <p>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.</p> <p>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 retention requirements for identified records.</p>	<p>The Keeper expects to see evidence that Staff creating, or otherwise processing records, are appropriately trained and supported.</p> <p>There seems to be ample evidence that information governance training is appropriately considered in the authority.</p> <p>For example, all staff must complete mandatory data protection training.</p> <p>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.</p> <p>The Assessment Team acknowledge that they have been sent a sample of staff training communications.</p>	<p>No change.</p> <p>Ongoing communication to existing members of staff as per Evidence</p> <p><a href="#">EL12_Evidence_AllStaffCommunication_In the Loop – Monday 15 November 2021</a></p> <p>On completion of the migration of data from SharePoint classic to modern (deadline 31<sup>st</sup> May 2022) a strategy for SharePoint will be detailed, this will include recommendations for ongoing delivery of training for the use of SharePoint and the best practice for management of digital records within SFT. SFT are happy to share a copy of this strategy document once it is approved.</p>	<p>Thank you for letting us know there have been no major changes to staff competency framework. The excerpt from staff communications is noted with thanks.</p> <p>It is reassuring to see that it is recognised that SFT's recently-concluded SharePoint migration will be followed up with staff training to ensure systems are used as intended, and that organisational naming conventions are being followed.</p>

				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.	When policies are updated, reference to these are included in All Staff Communications, which recently have been a twice weekly Newsletter – In The Loop.  <a href="#">EL12_Evidence_In The Loop Monday 25<sup>th</sup> May 2020</a>			
13. Assessment and Review	<b>G</b>	<b>G</b>	<b>G</b>	Update required on any change.	No Change.	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.  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.	Due to a change in reporting line for the Records Manager it has been agreed to put in place actions for 2022 following this PUR. This objective is the responsibility of the Records Manager (Information & Business Support Manager) which will be reviewed and supported by the Head of HR and Support Services who reports directly to the Senior Officer Responsible (Director – Corporate Services & Investments)  <a href="#">EL13_Evidence_Screenshot_HR PPDSystem_Objective2022-23</a>	Thank you for this update. SFT's regular participation in the PUR process should be commended. It is great to hear that this is recorded as a records management business objective (the screenshot has been received and retained with thanks). It is also apparent from updates under other Elements that SFT aims to keep all relevant policies and plans under regular review as scheduled.  Update required on any future change.
14. Shared Information	<b>G</b>	<b>G</b>	<b>G</b>	Update required on any change.	No Change.	No immediate action required. Update required on any future change.	SFTs Information Governance Team are reviewing the External Sharing in line with the SharePoint Migration project and Best Practice Paper (see Element 5). This will then be presented to SFTs Leadership Team for approval.  <a href="#">EL14_Evidence_ExtSharingPaper</a>	Thank you for this positive update, and the provided draft on approach to external file sharing. SFT approach seems very reasonable with regard to the implications of the SharePoint data migration project.  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 31st May 2022. The progress update was submitted by Wendy Ross, Information & Business Support Manager.

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



Iida Saarinen  
Public Records Support Officer