

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

**Scottish Futures Trust**

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

**4<sup>th</sup> July 2020**

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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 the 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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**Progress Update Review (PUR) Template: Scottish Futures Trust**

Element	Status of elements under agreed Plan 01FEB17	Status of evidence under agreed Plan 01FEB17	Progress assessment status 29MAY19	Progress assessment status 04JUL20	Keeper's Report Comments on Authority's Plan 01FEB17	Self-assessment Update 27SEP18	Progress Review Comment 29MAY19	Self-assessment Update as submitted by the Authority since 29MAY19	Progress Review Comment 04JUL20
1. Senior Officer	G	G	G	G	Update required on any change.	No Change	No immediate action required. Update required on any future change	NRS were advised of the change of our Senior Responsible Officer in September 2019.  Evidence Provided: <a href="#">EL01_Evidence_Change of Senior Responsible OfficeSFT</a>  This has been updated in our Records Management Policy and Records Management Plan [copies provided under Element 2 and 3]	The Keeper's Assessment Team thanks the Scottish Futures Trust for the update regarding Caroline Whyteside, Corporate Services Director which has been noted.
2. Records Manager	G	G	G	G	Update required on any change.	No Change	No immediate action required. Update required on any future change	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.  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.  <a href="#">EL02_Evidence_SFT Records Management Plan v1.4</a>	The Keeper's Assessment Team thanks the Scottish Futures Trust for the update regarding Wendy Cliffe (now Ross), Office Manager which has been noted.  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.
3. Policy	G	G	G	G	Update required on any change.	SFTs Records Management Policy has since been updated to reflect the version control information (see update at element 11) and references to The General Data Protection Regulation and the Data Protection Act 2018.  <a href="#">EL3-Evidence: Records Management</a>	The updated Records Management Policy has been supplied and this evidences continuing review of the policy which is good practice.	As stated in Element 1, the Policy was updated to reflect the change in our Senior Responsible Officer.  <a href="#">EL03_Evidence_Records Management Policy v1.3</a>	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.

					Policy v1.2				
4. Business Classification	A	G	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</p>	<p>SFTs Business Classification Structure is still accurate and will be revisited as business dictates.</p> <p>A Leadership Team decision was taken not to implement the Records Management Centre while an external IT Strategy review was carried out as part of the overall ICT Strategy Review for 2017-20. Thus, ensuring that the Records Management solution on SharePoint was not approached in silo from other ICT projects. A concern of disproportionately negative impact on working practices across the business was also raised.</p> <p><a href="#">EL4 – Evidence: Extract from ICT Strategy 2017-2000</a></p> <p>Following this review and ICT Strategy agreement, it was agreed that the mandatory records would be prioritised and used as a pilot for wider implementation. These would not be managed by a Records Management Centre but by content types across certain areas to automate the destruction of records as required by statutes.</p> <p><a href="#">EL4 – Evidence: Records Management Paper to Leadership Team</a></p> <p>SFT acknowledge that this is a divergence from the original Records Management Plan and</p>	<p>SFTs plan to implement its BCS as originally set out in the RMP has changed due to changing business priorities. The Assessment Team recognise that priorities change over time but are encouraged by the continuing commitment to implement the BCS.</p> <p>A business decision was made by SFT to focus on those records which had retention periods defined by legislation first. The solution will be implemented on the remaining records when resources permit. The Assessment Team request that they are kept updated as this work progresses.</p> <p>It should be noted that extensive strategic changes in records management provision within SFT may require a formal re-submission of the RMP for the Keeper's agreement.</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 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</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 SFTs 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</p>

					<p>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>commit to reviewing appropriateness of solutions for the remainder of our records following updates to processes and procedures to comply with GDPR and recommendations from the External ICT Strategy Review. In Place Records Management for mandatory records was implemented across all relevant records in June 2018 in line with the retention schedule.</p> <p><a href="#">EL4 – Evidence: Brightwire Proposal – SharePoint Implementation Screen shots of In Place Records Management in use</a></p>		<p>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><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>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>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	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</p>	<p>SFTs Retention and Destruction Schedule reviewed by Burness Paul in March 2017 and confirmed as covering all mandatory requirements. The document was updated in line with GDPR compliance and finalised.</p> <p><a href="#">EL5 – Evidence: Final Retention and</a></p>	<p>The updated retention schedules have been submitted. Records which have enduring value, for example, the minutes of directors' meetings are scheduled for transfer to NRS at the end of their retention periods.</p> <p>The new schedule includes a section on the retention of</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><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</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</p>



				<p>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><a href="#">Destruction Schedule Email correspondence with Burness Paul</a></p> <p>Awareness sessions have been rolled out to all staff with follow up communications to remind staff of where to access information.</p> <p><a href="#">EL5 – Evidence: Copy presentation slides from awareness sessions (See Element 12)</a>  <a href="#">All staff communication following Records Management Training</a></p>	<p>personal data. The Assessment Team commends this important consideration.</p> <p>Were this a formal resubmission of SFT's RMP this evidence would likely to be sufficient to move the RAG rating from Amber to Green.</p>	<p>as previously approved by The Keeper has been retained with enhancements for Risk and Location included.</p>	<p>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>
6. Destruction Arrangements	G	G	G	G	<p>Update required on any change.</p> <p>SFT continue to work with their IT Managed Service Provider *Indigo (Previously named Exsel Group) to ensure up to date procedures are reflected in the ICT Policy for data deletion and back up /</p>	<p>The change in legal entity of the provider is noted with thanks.</p> <p>The Mobile Device Management project provides acceptable assurance that any records held on mobile</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>overwriting regime.</p> <p>SFT have opted to invest in the Blancco 6 Disk Eraser product, which includes SSD capabilities.</p> <p>Blancco is the leading data erasure product on the market with a wide range of global accreditations. A list of accreditations and certifications for this product is available at <a href="https://www.blancco.com/about-us/our-certifications/">https://www.blancco.com/about-us/our-certifications/</a></p> <p>The Mobile Device Management (MDM) implementation, Microsoft Intune, provides centralised control of all devices that access the SFT data environment.</p> <p><b>EL6 – Evidence: MDM Implementation</b></p> <p>*Since the last update, SFT's corporate IT provider, Exsel was acquired by a private equity provider. The new owner undertook a corporate restructure, which resulted in the contract with Exsel being transferred to Indigo IT and Communications. Whilst this resulted in a change of legal entity, service provision has remained uninterrupted and in accordance with the contractual requirements.</p>	<p>devices can be remotely deleted, thus reducing the risk of information security breaches and enabling remote compliance with the retention schedules.</p>		
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7. Archiving and Transfer	G	G	A	A	Update required on any change.	No Change  NRS have archived SFTs website – June 2017 and August 2018  <a href="https://webarchive.nrsco.tland.gov.uk/20180606010657/https://scottishfuturestrust.org.uk/">https://webarchive.nrsco.tland.gov.uk/20180606010657/https://scottishfuturestrust.org.uk/</a>  EL7: Evidence: Copy correspondence between SFT and NRS Web Continuity Service	The archiving of the website which contains the publicly available minutes (some of which are redacted) achieves a measure of compliance but is not a complete record. NRS Client Management Team have notified the Assessment Team that they are in discussion with SFT in connection with this.  Following discussions with SFT, it has been agreed that the transfer of some of SFT's earlier records to NRS will commence early in 2019. The Assessment Team accepts this development as appropriate and recommends that SFT maintains contact with the NRS Client Management Team to work towards developing a Memorandum of Understanding (MoU) to govern the future systematic transfer of records selected for permanent preservation. The template MoU used by NRS is currently being revised and amended, which may result in a delay in finalising an agreement, but SFT should in the meantime continue to liaise with the NRS Client Management Team to finalise a MoU.	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.  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.	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.  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.
8. Information Security	G	A	G	G	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	SFT was recently awarded Cyber Essentials Plus certification. It is our policy, following an ICT security review, to fully review the ICT policy. Therefore, we expect to	The Assessment Team commends SFT for the achievement of the Cyber Essentials Plus certification.  The Assessment Team also thanks SFT	SFT continues to work towards maintenance of the Cyber Essentials Plus certification which is due for annual accreditation in September 2020  The ICT Policy has been updated following the required review date. A	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>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>be able to share a copy of the new version of SFTs ICT Policy with the keeper by end of 2018.</p> <p><a href="#">EL8 – Evidence: Cyber Security Certificate</a></p>	<p>for providing them with the new version of the ICT Policy (version 2.3). If this were a formal resubmission of the RMP it is likely that this Element would now be green.</p>	<p>copy is included for The Keeper.</p> <p><a href="#">EL08_Evidence_IT Policy V2.4</a></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>	
9. Data Protection	G	A	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>SFT review the Data Protection Policy regularly to ensure accuracy and has updated its Data Protection policy to comply with the GDPR and the Data Protection Act 2018.</p> <p>All staff have received refresher training on: Data Protection – November 2017 FOI – January 2018 eLearning module for GDPR compliance – May 2018</p> <p>eLearning was delivered by IT Governance (<a href="#">Link to further detail</a>) This eLearning required a 75% pass mark to achieve completion and was mandatory for all active staff.</p> <p><a href="#">EL9 – Evidence: Data Protection Policy 2018</a> <a href="#">Link to detail on eLearning for GDPR (above)</a> <a href="#">Copy Training slides for Data Protection &amp; FOI refresher training sessions (see Element 12)</a> <a href="#">All Staff Communications</a></p>	<p>The Data Protection Policy, 2018 has been supplied and the Assessment Team thanks SFT for this.</p> <p>The Assessment Team has reviewed the Data Protection Policy 2018 and considers that, if this were a statutory review, this evidence would be likely to be sufficient to move the RAG rating of evidence from Amber to Green</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 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: <a href="https://www.scottishfuturestrust.org.uk/page/privacy-notice">https://www.scottishfuturestrust.org.uk/page/privacy-notice</a></p>

10. Business Continuity and Vital Records	G	G	G	G	Update required on any change.	No Change  SFT review the Business Continuity Policy in accordance with control periods and/or where any significant external occurrence requires review.	No immediate action required. Update required on any future 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 Polioy 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?)
11. Audit Trail	G	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.	SFT has recognised the value of version control for SFT Policies and has implemented a standard template that will be adopted on all new and updated policies going forward. In addition to this SFT have issued staff with a Guidance Note on file naming to assist with the search capabilities within SharePoint.  <a href="#">EL11 – Evidence: Document Version Control - Guidance Note Staff communications</a>	The Guidance Note for staff on version control has been provided. It is clear and succinct, and it should be possible for staff to follow this guidance in the course of normal business.	No change	No immediate action required. Update required on any future change.
12. Competency Framework	G	A	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	1:1 Training provided to staff responsible for the areas where In Place Records Management has been implemented across SharePoint.  Further awareness sessions were run for all staff in June and July 2018 following live implementation of the In-Place Records	Samples of training have been provided and the Assessment Team thanks SFT for this update. The Assessment Team has reviewed the training samples provided and considers that, if this were a statutory review, this evidence would be likely to be sufficient to move the	New members of staff continue to be required to complete the following as part of their Induction. <ul style="list-style-type: none"> <li>Data Protection eLearning module</li> <li>FOI Training</li> <li>Records Management policy and plan.</li> </ul>	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

					<p>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 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.</p>	<p>Management process.</p> <p><a href="#">EL12 – Evidence: Training Presentation Slides for:</a></p> <ul style="list-style-type: none"> <li>• <a href="#">Data Protection (May 18)</a></li> <li>• <a href="#">FOI Refresher (Jan 18)</a></li> <li>• <a href="#">Records Management Awareness (Jun/Jul 18)</a></li> </ul> <p><a href="#">All staff communications</a></p>	<p>RAG rating of evidence from Amber to Green.</p> <p>All SFT staff completed the eLearning module on GDPR in May 2018. The updated Data Protection Policy, amended to take account of new data protection legislation, was also communicated to all staff in June 2018. The Assessment Team recognises the commitment to ensuring that relevant policies and training are updated when necessary, in this case as a result of changes to legislation.</p>	<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>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><a href="#">EL12_Evidence_In The Loop Monday 25<sup>th</sup> May 2020</a></p>	<p>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>
13. Assessment and Review	G	G	G	G	Update required on any change.	No Change	No immediate action required. Update required on any future 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>

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 29<sup>th</sup> May 2020. The progress update was submitted by Wendy Ross, Corporate Services Office Manager.

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

### PRSA Assessment Team's Summary

The Assessment Team has reviewed the Scottish Futures Trust's Progress Update submission and agrees that the proper record management arrangements outlined by the fourteen 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

The 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.

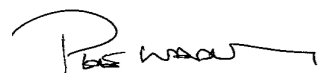
The Keeper cannot change the status of elements formally agreed under a voluntary submission, but he can use such submissions to indicate how he might now regard this status should the authority choose to resubmit its plan under section (5)(6) of the Act.

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

Based on the progress update assessment the Assessment Team considers that the 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,



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Pete Wadley  
Public Records Officer