

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

**Scottish Law Commission**

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

**24 October 2019**

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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 **Draft** 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 Law Commission. The outcome of the assessment and relevant feedback can be found under sections 6 – 8.

### 4. Authority Background

The Scottish Law Commission consists of 5 Commissioners appointed by Scottish Ministers. One of the Commissioners is the Chair who by convention is a Court of Session judge. The other Commissioners are drawn from those holding judicial office, advocates, solicitors or university law teachers. Commissioners are appointed for a maximum term of 5 years with the possibility of re-appointment.

The main work of the Scottish Law Commission is in reforming the law. They also work on consolidation of statutes and on statute law repeals as well as giving advice and information to Government. The advisory role often involves examining whole areas of law and making recommendations to improve them.

In choosing areas of work, the Scottish Law Commission is guided by judges, lawyers, government departments, the Scottish Government, interest groups and the general public who provide information of their experiences in applying a particular area of the law or in obtaining legal remedies.

The Scottish Law Commission has responsibilities in all areas of Scots law including those reserved to the legislative competence of the UK Parliament at Westminster.

<http://www.scotlawcom.gov.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): Scottish Law Commission**

Element	Status of elements under agreed Plan, 17 Jun 2015	Status of evidence under agreed Plan, 17 Jun 2015	Progress assessment status, 20 Dec 2018	Progress assessment status, <date>	Keeper's Report Comments on Authority's Plan, 17 Jun 2015	Self-assessment Update 20 Dec 2018	Progress Review Comment, 20 Dec 2018	Self-assessment Update as submitted by the Authority since 20 Dec 2018	Progress Review Comment 2019
1. Senior Officer	G	G	G	G	Update required on any change.	No change.		No change	No immediate action required. Update required on any future change
2. Records Manager	G	G	G	A	Update required on any change.	The Key Contact and individual identified as having day-to-day responsibility for implementing the Plan is now Mr Andrew Crawley who is, among other things, the authority's Records Manager.	Change noted with thanks.	There will be a new key contact with effect from 30 July 2019. The contact has yet to be appointed but mail can be sent to the 'records manager'.	This update and current contact information is noted with thanks. As this element is a statutory requirement the Keeper will require to be notified of the name of the new post holder with evidence of the authority's support for the role once they are appointed.
3. Policy	G	G	G	G	Update required on any change.	SLC have supplied version 1.1 of their Records Management Policy Statement (previously 1.0).	Update noted with thanks.	The Records Management Policy Statement has been reviewed, with minor changes (now version 2.0).	The revised Records Management Policy now takes account of the changes to data protection requirements and is being reviewed every two years rather than annually. This is a practical approach and the Assessment Team consider that this continues to be fully compliant with the Keeper's requirements.
4. Business Classification	G	G	G	G	Update required on any change.	No change.		The Business Classification Scheme has been reviewed, with minor changes (now version 2.0).	The introduction to the BCS now includes helpful additional clarification of the functions and activities of the Commission and the records that are generated by these functions and activities. The Assessment Team welcome these changes which should assist the Commission to maintain and use the BCS.
5. Retention Schedule	A	G	A	A	The Scottish Law Commission has a <i>Records Retention Schedule</i> in place for their corporate functions but not the administrative activities supporting those functions.	SLC have submitted their bi-annual records management review.	The Keeper has not had the opportunity to review this schedule.	The official record is partially duplicated in electronic files on network drives and in Outlook folders.	The new retention and disposal schedules submitted as evidence show significant progress in this element.

					<p>The authority is committed to closing this gap by creating retention schedules which cover the Commission's administrative activities.</p> <p>The Keeper agrees this element on 'improvement model' terms. This means that he is convinced that the Commission has identified a gap in provision (an administrative records retention schedule) and has committed to closing that gap.</p>	<p>This shows that the administrative records retention schedule was completed in May 2016.</p>	<p>The Keeper would need to be confident that the new schedule now details retention decisions against <u>all</u> record types created by the Scottish Law Commission as it pursues activities relating to its functions. The Keeper would also need to be confident that there was a mechanism where these retention decisions can be imposed, either manually, automatically or a combination of the two, and that staff are aware of how that mechanism is implemented.</p> <p>With sight of the new retention schedule and evidence of its operation as above, the Keeper may be able to move the status of this element from amber to green should SLC choose to do a formal re-submission as is their right under section 5.6 of the Act.</p>	<p>The Records Retention and Disposal Schedule has been reviewed, and revised to include electronic records (now version 2.0).</p>	<p>There appears to be a comprehensive set of schedules including records held electronically as well as paper records. There is guidance on where these records are to be kept and instructions for records to be reviewed by senior staff prior to destruction.</p> <p>It appears that not all the files designated as 'permanent' are scheduled for transfer to NRS and it is recommended that the terminology is reviewed to clarify which records are of enduring value and which are of long-term value as working reference files. The agendas and papers of Commission meetings, for example, would appear to be of enduring value, and therefore transferable to NRS whereas Freedom of Information files might only be required until the relevance of the contents were superseded by new Freedom of Information legislation.</p> <p>There is clearly significant progress in this element towards achieving a green status and the Commission is to be commended for the hard work that has gone into these developments.</p>
6. Destruction Arrangements	A	A	A	A	<p>The Commission intends to develop and implement a formal policy for the management of electronic records on the G Drive and also for the records of completed projects. This work is scheduled for completion by the end of February 2016. The Keeper welcomes this commitment and looks forward to seeing the policy once it has been implemented.</p>	<p>The Commission have indicated that, to be compliant, they require to "Adopt a policy (policies) for the management of electronic records on the G drive. Consider adopting: File management policy; Record naming policy (<b>see under element 11 below</b>)</p>	<p>The Keeper agrees the suggested improvements are appropriate.</p> <p>He notes that the G drive management policy is a long-standing aim of the Commission and looks forward to further updates.</p>	<p>The Commission has adopted:</p> <ul style="list-style-type: none"> <li>• Electronic Records Policy (version 1.0)</li> <li>• Naming Policy (version 1.0)</li> <li>• Version Control Policy (version 1.0)</li> </ul> <p>The Commission has also reviewed and updated its Records Disposal Policy and Retention and Disposal Schedule accordingly (both now versions 2.0).</p>	<p>The new Electronic Records Disposal Policy provided is a welcome step forward. It is clear from this that the use of Scottish Government disposal procedures ensures that most electronic records are deleted securely in accordance with the retention schedules.</p>

					<p>The Keeper can agree this element on an 'improvement model' basis. This means that the Commission has identified a gap in provision (in this case, the systematic destruction of electronic records on its G Drive) and has shown a firm commitment to closing the gap. This agreement is conditional upon receiving the above mentioned policy for the management of electronic records on the Commission's G Drive once it has been developed.</p>	Send evidence to NRS	He encourages the Commission to adopt a naming convention policy which, coupled with the version control policy (currently in draft) should help manage records throughout the authority.		<p>The Naming Policy and Version Control Policy also provided will make it much easier to manage the records and ensure that all copies of records are destroyed in accordance with the retention schedules.</p> <p>There remains, however, some uncertainty around the appropriate, secure deletion of records held on local drives (i.e.: the G drive and individual CPUs/PCs). The Policy indicates that these records must be destroyed but does not say how or by whom. The Assessment Team recommend that the Commission includes a statement of responsibility and an indication of methods. Some reference to industry standards for deletion may be appropriate, such as using an external company that conforms to ISO 27001. Advice is provided by the Information Commissioner's Office <a href="https://ico.org.uk/your-data-matters/online/deleting-your-data-from-computers-laptops-and-other-devices/">https://ico.org.uk/your-data-matters/online/deleting-your-data-from-computers-laptops-and-other-devices/</a></p>
7. Archiving and Transfer	A	G	A	G	<p>The Scottish Law Commission is currently in negotiation with the Keeper regarding the provision of an archive facility for those records appraised as suitable for permanent preservation. These negotiations should result in a formal MoU being created between the Commission and the Keeper.</p> <p>The Keeper is happy to agree this element of the Scottish Law Commission's RMP under 'improvement model' terms.</p>	No change.	<p>The Keeper acknowledges that SLC have been in contact with his Client Management Team.</p> <p>Presently, there is a delay in making MoUs with NRS available to public authorities. The Keeper therefore acknowledges that the Scottish Law Commission are as compliant on this element as is currently possible.</p>	A memorandum of understanding was entered into between the Commission and the National Archives of Scotland, dated 22 October and 11 November 2015. The Memorandum is subject to review by the parties no later than 11 November 2020.	<p>The Keeper thanks the authority for this update. The Assessment team note that if this were a statutory submission this element would now be likely to move to Green.</p> <p>The Assessment Team also note that had it not be for a miscommunication, this element would most likely have moved to Green in the previous PUR as the required MoU had been signed at that time.</p>

					This means that he is confident that the authority intends to close a gap in provision but requires to be updated as the process continues.				When the MoU is next reviewed NRS will want to renegotiate it to take account of the requirements of the Data Protection Act 2018 and GDPR. The delay in 2018 that prevented the negotiation of a new MoU for GDPR purposes has now been resolved.
8. Information Security	G	G	G	G	The Keeper welcomes the commitment by the authority to provide staff with training in Information Security as part of wider records management training over the coming months and would be interested in hearing about these sessions.	No change.  (but see element 9 below)		The Commission has recently reviewed and revised its Statement on Information Security (now version 2.0).	The new version of the Statement on Information Security has taken account of the changes in legislation and sets out more clearly the Commission's commitment to maintaining information security. The Commission continues to emphasise the importance of staff training and also acknowledges the importance of other policies in contributing to information security. These developments demonstrate that the Commission continue to take Information Security seriously.
9. Data Protection	G	G	A	G	The Commission intends to develop information and guidance about making subject access requests and to make this available on their website. This is to be completed by the end of June 2015. The Keeper commends this approach and looks forward to being informed of the completion of this work.	The introduction of GDPR/DPA 2018 since the Keeper's agreement has required this element to be adjusted for all public authorities. The Scottish Law Commission recognise this and state: "Data Protection policy statement...Needs re-drafting to take account of GDPR"	The Keeper welcomes a commitment to revisit the data protection arrangements in the authority in light of new legislation, although he accepts that the Commission receives very few subject access enquiries. He looks forward to receiving the new statement at the next PUR when it might be expected this element will return to full compliance.	The Commission has revised and updated its data protection policy statement to refer to the GDPR (now version 2.0), and published a privacy statement on its website. Staff must pass compulsory SG data protection training each year (as part of SCOTS IT accreditation).The Commission has also adopted desk instructions for complying with subject access requests by data subjects (version 1.0).	The revised data protection policy brings the Commission back into full compliance with the Keeper's requirements, as expected. The Commission has ensured that the provisions of the Data Protection Act 2018 and GDPR have been applied. Responsibilities for compliance with legislation are properly identified and allocated to relevant posts. Training for all staff is provided and repeated annually. The Assessment Team have seen the procedures supporting the policy, which are thorough and appropriate.

									The Commission is to be commended for its honesty in recognising that it was initially non-compliant with the new legislation and for its efforts to ensure compliance as quickly as possible.
10. Business Continuity and Vital Records	A	G	A	G	<p>Although currently covered under the arrangements of the Scottish Government, the Commission intend to review and update its own risk register and produce a bespoke business continuity plan including vital records. This project is timed for completion by the end of February 2016. The Keeper welcomes this decision and requests sight of this new plan once it is operational.</p> <p>The Keeper can agree this element on 'improvement model' terms. This means that he is convinced that the Commission has identified a gap in provision (a business continuity plan specific to the authority) and has committed to closing that gap.</p>	<p>The Commission states that the "Plan as submitted to NRS deals only with the recovery of data on SCOTS, and is therefore an improvement plan." "Need to prepare full plan and adjust risk register accordingly". The Keeper agrees this.</p> <p>The Commission have provided the Keeper with a <i>Note on Vital Records</i>. He thanks them for including this and agrees that it is useful as a means of identifying core records that need priority recovery. The Keeper expects the <i>Note</i> to inform the new <i>Business Continuity Plan</i>.</p>	The Keeper looks forward to receiving the new Business Continuity Plan showing record recovery for all public records with priority given to the 'vital' records identified by using guidance provided in the <i>Note on Vital Records</i> .	The Commission has adopted a Business Continuity Plan (version 1.0). The plan refers to vital records.	<p>The Business Continuity Plan has been provided to the Assessment Team. The information in Vital records is duplicated in electronic records, stored securely and robustly.</p> <p>It appears that the method envisaged to recover records categorised as "important" is to re-create them from other sources. The Assessment Team recommend that the Commission consider the option of using a document/paper recovery firm to dry, clean and restore records. This can be more efficient and cost-effective than re-creating records following a significant incident.</p> <p>The Assessment Team consider that the adoption of this Business Continuity Plan closes the gap in provision and that if this were a statutory submission it is likely that this element would move to Green. However, they would encourage the Commission to develop its recovery plans further by considering additional options for the recovery "important" records held in paper format.</p>
11. Audit Trail	G	A	G	G	<i>The Scottish Law Commission's corporate record is paper. However, as well as the physical files a file tracking system is in operation using databases. This means that records can be tracked electronically no matter what media.</i>	A draft of version control documentation has been provided.	The Assessment Team have reviewed the draft version control documentation and agree that this is a positive step towards identifying the correct version of records.	<p>The Commission has adopted a:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Document naming policy (version 1.0), and</li> <li><input type="checkbox"/> Document version control policy (version 1.0).</li> </ul> <p>Compliance with these policies will be monitored by the Office Manager, the Executive Assistant team, and the Records Manager.</p>	The Commission have made considerable progress and now have in place the relevant policies to ensure that electronic records are appropriately controlled and can be tracked.

					<p><i>As evidence, the Commission has supplied screen shots of sample pages of these databases. The Keeper thanks the commission for this inclusion.</i></p> <p>At present different practices are used within the Commission with regards to version control of documents and the Commission has recognised that this is an area in which a consistent approach is required. They have committed to developing a formal policy on version control which will help to standardise practice in this area. They intend to develop this by February 2016 and this commitment is supported by a statement in the covering letter from the Chief Executive. The Keeper requests that he is sent a copy of the policy once operational.</p> <p>The Keeper agrees that the Scottish Law Commission has procedures in place that allow them to locate records and verify that they can identify the correct version of a record and that there is a commitment to standardising practice in this area</p>		<p>The Assessment Team would encourage the Commission to adopt a naming convention policy which, coupled with the version control policy (currently in draft) should help manage records throughout the authority.</p> <p>This element remains compliant as there is a tracking system in place for both paper and electronic records but the Keeper still would like to see operational policies for version and naming control to standardise practice.</p>		<p>This should also assist with ensuring compliance with Element 6 by minimising the risk that duplicate records are mistakenly retained beyond the disposal date of the principal record. The Commission are to be commended for their work in improving this element.</p>
12. Competency Framework	G	G	G	G	Update required on any change.	No change.	The Keeper commends the principle that "all staff have record management tasks as part of their objectives" which has been suggested by SLC.	The Commission has revised its Competency Framework for Records Management Staff (now version 2.0), to include style performance management objectives.	The review and continued development of this element demonstrates commitment to the need for a professional approach to records management within a small organisation with limited staffing resources.

									The Commission is to be commended for its continuing work in this area and for the support it gives staff in developing and maintaining appropriate levels of records management competencies.
13. Assessment and Review	A	G	A	G	<p>The Keeper commends the strong emphasis on the importance of continuous review of records management policies and procedures. As part of this the Commission will develop a methodology for reviewing the RMP and share this with the Keeper when operational.</p> <p>The Keeper agrees this element on 'improvement model' terms. This means that he is convinced that the Commission has identified a gap in provision (a formal process for revision) and has committed to closing that gap.</p>	<p>The Scottish Law Commission state that they need to:</p> <p>"Develop review"</p> <p>"Have regard to Keeper's guidance on the NRS model records plan"</p> <p>"Consider whether to add to internal audit"</p>	<p>The Keeper acknowledges that the SLC gap analysis provided to him shows an intention to review the implementation of the records management plan.</p> <p>He looks forward to further information regarding the review methodology when a process has been developed.</p> <p>Previously the Keeper has commended the inclusion of the implementation of the records management plan, and information governance generally, in an authority's internal audit worklist. However, this must remain a business decision for the authority.</p>	<p>The Commission has adopted a Records Management Review Policy (version 1.0).</p>	<p>The Commission has developed a system of listing and reviewing all relevant policies and current procedures on an annual or biennial basis, allocating responsibilities for managing this appropriately. The Policy has been provided as evidence of this system and further evidence has been provided by the submission of various policies which have been reviewed in accordance with the timetable given in the Records Management Review Policy.</p> <p>The Commission is to be commended for setting up this system and also for undertaking and submitting this Progress Update Review. The Assessment Team consider that if this were a statutory review it is likely that this element would move from Amber to Green.</p>
14. Shared Information	G	G	G	G	<p>Update required on any change.</p>	<p>The Scottish Law Commission state under this element:</p> <p>"Minor tweaking to update references to former DPA"</p> <p>"Need to cover data sharing in respect of recruitment and period of office of Commissioners."</p> <p>"Need to ensure this is visible to staff. Review intranet/website."</p>	<p>The Keeper acknowledges and agrees the suggested improvements while accepting that the authority remains fully compliant at this element.</p>	<p>The Commission has recently reviewed and revised its Statement on Information Sharing (now version 2.0), which now refers to the GDPR and includes a link to our online privacy statement.</p>	<p>This update along with the revised Statement on Information Sharing is noted with thanks. The Commission is to be commended for keeping this element under review and improving on existing compliance.</p>

## 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 25 July 2019. The progress update was submitted by Andy Crawley, Solicitor.

The progress update submission makes it clear that it is a submission for the **Scottish Law Commission**.

### PRSA Assessment Team's Summary

The Assessment Team has reviewed the **Scottish Law Commission'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 Law Commission continues to take its records management obligations seriously and is working hard to bring all elements into full compliance. The Assessment Team commend the work undertaken to develop further the Commission's compliance with Element 8 and to bring the Commission back into full compliance with Element 9. There has also been considerable progress in Elements 7, 10, 12 and 13. The current vacancy at Element 2 puts this element temporarily into Amber until such time as the Commission are able to make a new appointment to this statutory role.

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. If this were a statutory submission, it is likely that Elements 7, 10 and 13 would now be assessed as Green.

Where 'no change' has been recorded under the update on provision by the authority, the Assessment Team is happy to agree that these elements require no further action for the time being.

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

Based on the progress update assessment the Assessment Team considers that the **Scottish Law Commission** continues 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,



**Elsbeth Reid**  
Public Records Officer