

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

## **Scottish Public Pensions Agency**

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

**16<sup>th</sup> January 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 Public Pensions Agency. The outcome of the assessment and relevant feedback can be found under sections 6 – 8.

### 4. Authority Background

The Scottish Public Pensions Agency (SPPA) administers pensions on behalf of the Scottish Government for Teachers, the Police and Firefighters as well as for employees of the National Health Service in Scotland.

SPPA also provides policy advice to Scottish Ministers on public sector pension issues and is responsible for developing the regulations for Scotland's Local Government Pension Scheme – and for determining any appeals made by its members. SPPA also provides a pension calculation service for the Legal Aid (Scotland) Pension Scheme and the Scottish Parliamentary Pension Scheme.

<https://pensions.gov.scot/>

### 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 Public Pensions Agency (Part of 'Scottish Ministers')**

Element	Status of elements under agreed Plan 06AUG14	Status of evidence under agreed Plan 06AUG14	Progress assessment status 16JAN20	Keeper's Report Comments on Authority's Plan 06AUG14	Self-assessment Update as submitted by the Authority since 06AUG14	Progress Review Comment 16JAN20
1. Senior Officer	<b>G</b>	<b>G</b>	<b>G</b>	Update required on any change	Matthew Valente, Head of Business Management	The Assessment Team thanks SPPA for alerting us to this change which we have noted.
2. Records Manager	<b>G</b>	<b>G</b>	<b>G</b>	Update required on any change	<p>Jonathan Sharp remains the point of contact but now holds the post of <i>Head of Security</i> (since August 2016) which represents a dedicated role responsible for ensuring that SPPA is compliant with the HM Government's Security Policy Framework (SPF) with a focus on risk management and implementation of an Information Assurance (IA) Strategy.</p> <p>Areas of responsibility include:</p> <ul style="list-style-type: none"> <li>• Data Protection (including implementing GDPR)</li> <li>• Data Security</li> <li>• Records Management</li> </ul>	<p>The Assessment Team thanks SPPA for alerting us to this change which we have noted.</p> <p>As a matter of fact we already had Mr Sharp's new job title on record, but the expanded information about the information governance responsibilities this job entails is useful.</p> <p>The Assessment Team acknowledge that there may</p>

					<ul style="list-style-type: none"> <li>• Information Assurance</li> <li>• Protective Security (physical and personnel security)</li> <li>• Business Continuity</li> <li>• Cyber Resilience</li> </ul> <p>This role is due to be reviewed during 2019-20 as part of SPPA's Target Operating Model project. The Keeper will be updated with regard to any changes in responsibilities and/or personnel.</p>	<p>be changes in the element shortly and thanks SPPA for their commitment to keep the Keeper informed.</p>
3. Policy	<b>G</b>	<b>G</b>	<b>G</b>	<p>The introduction to the RMP commits SPPA to review the <i>Records Management Policy</i> as part of its 'annual review cycle'. The Keeper commends this approach and would be interested in hearing of any changes following these reviews.</p>	<p>1. As part of business as usual, SPPA undertakes an annual review of Information Assurance during Q3 of each year. This encompasses a review of the Records Management Policy (RMP).</p> <p>2. The RMP remains largely unchanged since the submission to The Keeper. The plan has been amended to encompass GDPR.</p> <p>3. In August 2016-17 an independent audit of Information Assurance was undertaken by security specialist Keith Nicholson. This was part of a broader suite of audits encompassing security at SPPA. The resulting audit praised the approach taken by SPPA and the resulting recommendations were made to enhance '<i>...the existing</i></p>	<p>The Assessment Team acknowledge receipt of an updated SPPA Records Management Policy. This is version 3 (August 2019). We will retain this on file in order that the SPPA submission can be kept up-to-date.</p> <p>In their original submission the SPPA committed to updating relevant policy documents on a regular basis. The Assessment Team appreciates the confirmation that this is being done.</p> <p>The Assessment Team notes the continual review of the authority's records</p>



					<p><i>good practices as a foundation for further development'</i></p> <p>4. During 2018-19 Scottish Government Internal Audit undertook a review of SPPA's <i>Data Quality and Records Management</i> giving an overall <i>reasonable</i> assurance. Recommendations included adequate succession planning for the Head of Security role, a decision on a Data Protection Officer role within SPPA, adoption of an eRDM system and review of the file retention schedule.</p>	management provision that has been undertaken since the original agreement (see element 13 below)
4. Business Classification	<b>G</b>	<b>G</b>	<b>A</b>	<p>The comprehensive Business Classification Scheme (BCS) mirrors the hierarchical structure of the organisation. As the directorate structure of SPPA is currently being amended the Keeper requests that he is sent a revised document should the adjustment result in a new BCS being created.</p>	<p>1. The hierarchical structure is in the process of transition.</p> <p>2. The Target Operating Model for SPPA is currently being implemented which will enact changes in the organisational structure. The Keeper will be informed of resulting changes to the Business Classification Scheme.</p>	<p>This element temporarily turns Amber as the Business Classification Scheme of the SPPA is currently in 'the process of transition'. The Assessment Team is perfectly content that this situation will resolve itself over the next year or so and look forward to an update (and the element reverting back to Green) in subsequent PURs. SPPA has committed to keeping the Assessment Team updated on progress.</p>
5. Retention Schedule	<b>G</b>	<b>G</b>	<b>G</b>	<p>SPPA have outlined steps they will take to maintain the integrity</p>	<p>1. SPPA continues to maintain a File Retention Scheme which is</p>	<p>For the information assurance review see element 13 below.</p>

				<p>of retention periods in light of the planned changes to corporate systems over the next few years. The Keeper welcomes this commitment and asks that he is updated should fundamental changes occur.</p>	<p>reviewed annually as part of the Information Assurance Review. The schedule is being revised to accommodate the change in organisational structure and identify a greater level of detail in respect to links with Information Asset Owners and individual Information Assets that we have registered.</p> <p>2. SPPA are currently working with <i>Aquila Heywood</i> to enhance SPPA's existing Pension administration system (<i>altair</i>). The Altair Improvement Programme will, by 2020, involve the following:</p> <ul style="list-style-type: none"> <li>• Migrating the payrolls for NHS and Teachers schemes from Northgate to Aquila Heywood's Altair system</li> <li>• Implementing the Altair member self-service web portal and an 'i-Connect' employer web portal to improve online experiences for customers</li> <li>• Undertaking a continuous improvement initiative to develop better use of the Altair software in the administration areas of the NHS and Teachers schemes</li> </ul> <p>The expected benefits are:</p> <ul style="list-style-type: none"> <li>• Streamlined business processes</li> <li>• Accurate and consolidated management information</li> </ul>	<p>The Assessment Team acknowledges that the update of the Altair line-of-business system was completed during the period this PUR was being assessed.</p> <p>The Keeper should be able to agree that specialist case administration systems have retention (element 5) and document tracking (element 11) functionality.</p> <p>This is clearly a key system for managing the activities of SPPA and the Assessment Team thanks them for sharing details of the improvement programme here. They look forward to further updates once the enhancements have been rolled-out and are fully operational.</p>
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					<ul style="list-style-type: none"> <li>• IT cost reduction and systems consolidation</li> <li>• Reduction of Pension Administration costs</li> <li>• Reduced training costs</li> <li>• Improved regulatory and legal compliance</li> <li>• Increased productivity and efficiency (workflow v manual)</li> <li>• Improved accuracy and valuable data relating to key performance indicators which will allow managers to manage their resources more effectively</li> <li>• Greater automation</li> <li>• Self-Service functionality for both SPPA users and external customers</li> <li>• Improved data quality through better validation</li> </ul>	
6. Destruction Arrangements	A	A	A	<p>Due to the nature of the authority's core business, electronic case files are held indefinitely. The authority is in the process of redesigning their systems under an 'Information Assurance Strategy' and the Keeper understands that formal electronic record deletion procedures will be part of that design. The Keeper requests that, when the new system is in place, he receives a copy of the staff instructions on deleting electronic records to keep the SPPA submission up-to-date. The</p>	<p>1. Secure waste disposal processes remain unchanged.</p> <p>Secure waste cabinets are provided throughout the building along with on-site secure document destruction with certification.</p> <p>2. SPPA are approaching the conclusion of a paper scanning exercise to reduce the amount of paper files held by SPPA. These primarily include Policy and Finance files that are required to be kept in accordance with the</p>	<p>The Assessment Team acknowledges the update regarding scanning of paper record and is content that the destruction of hard copy records is controlled and secure.</p> <p>However, this PUR does not address the issue of the destruction of digital records nor does it provide an update on the Information Assurance</p>

				<p>Keeper would recommend that SPPA considers issuing staff guidance on the irretrievable deletion of e-mail as part of these instructions.</p> <p>The Keeper agrees this element under 'improvement model' terms. This means that he is convinced of the authority's commitment in closing a gap in provision. He will request that he is updated as work on this element progresses.</p>	<p>SPPA File Retention Policy. The scanned files are being held securely on a searchable database, accessed only by those with a business need. The scanning is to BIP 0008 standard and is being undertaken by the Scottish Government's Central Scanning Unit (CSU). The paper files, once scanned, are held by CSU for six months before being securely destroyed.</p> <p>3. Workflows have been added to <i>altair</i> to aid and track the processing of personal information requests under Data Protection Legislation. This includes the <i>right to erasure</i>.</p>	<p>Strategy which SPPA had originally indicated might address guidance on electronic record destruction. SPPA have confirmed to the Assessment Team that The process to review the SPPA file retention policy will address guidance on electronic file destruction as we work through each department.</p> <p>This element remains at amber for the moment. However, SPPA should be aware that should the Keeper require a formal re-submission he would expect clear evidence that the controlled, secure and irretrievable destruction of digital records in line with the authority's retention schedules has been addressed.</p>
7. Archiving and Transfer	G	G	G	Update required on any change	No change	No immediate action required. Update required on any future change.

						The Assessment Team notes that SPPA have been engaging with the National Library of Scotland regarding archiving certain documents (that have already been published).
8. Information Security	G	G	G	SPPA have embarked on an Information Security project that will take some considerable time to complete. To assist this they have created an <i>Information Assurance Maturity Assessment</i> process. This is reviewed annually and is next due for review by the end of the second quarter 2014-15. The Keeper commends these efforts and requests receipt of updates on this project in order to keep the SPPA submission current.	<p>1. SPPA continues to review Information Assurance Maturity on an annual basis.</p> <p>2. In October 2017 SPPA became a Cyber-Catalyst organisation under the Public Sector Action Plan on Cyber Resilience.</p> <p>3. As part of the commitment to be a Public Sector Cyber Catalyst organisation, SPPA has achieved Cyber Essentials accreditation and is currently working towards Cyber Essentials Plus accreditation by the end of Q4 2019-20.</p> <p>4. SPPA Head of Security has utilised internal staff communications to improve the security culture within the organisation. A key element of this includes good practices in respect to information security.</p>	<p>For review see under element 13 below.</p> <p>The Assessment Team thank SPPA for updating them on Cyber-Catalyst:  <a href="https://www.gov.scot/publications/cyber-resilience-strategy-scotland-public-sector-action-plan-2017-18/">https://www.gov.scot/publications/cyber-resilience-strategy-scotland-public-sector-action-plan-2017-18/</a>  They look forward to an update on Essentials Plus in a subsequent PUR.</p> <p>See also under element 12 below.</p>

					5. Information Security risk is reviewed on a quarterly basis by SPPA's Risk Governance Group.	
9. Data Protection	G	G	G	Update required on any change	<p>1. SPPA undertook a comprehensive project to prepare for the new data protection legislation.</p> <p>This was challenged by a cross cutting review into GDPR preparedness undertaken by the SG Internal Audit Directorate in December 2017. It concluded:</p> <p><i>"...SPPA are aware of the changes required by for GDPR. This is reflected in that there are no major areas of improvement highlighted in this Management Letter although we make three Recommendations in Annex B. Where changes are required, our review work indicated that consideration is contained within SPPA's GDPR Workplan."</i></p> <p>The three recommendations related to works that were in progress at the time of the audit; relating to the development of an <i>altair</i> workflow, reviewing contracts and updating Data Sharing Agreements with all employers.</p> <p>2. 100% of SPPA's staff have undertaken Data Protection</p>	<p>As with all other Scottish public authorities the Scottish Public Pensions Agency 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 SPPA website has been updated appropriately:</p> <p><a href="https://pensions.gov.scot/data-protection-privacy-policy">https://pensions.gov.scot/data-protection-privacy-policy</a></p> <p>For review see under element 13 below.</p>

					<p>Training (e-learning was updated to cover GDPR)</p> <p>3. SPPA continues to work closely with colleagues within the Scottish Government and Information Commissioner's Office as part of a 'practitioner's group' that meets on a quarterly basis.</p> <p>4. Data Protection risk is reviewed on a quarterly basis by SPPA's Risk Governance Group.</p> <p>5. A Compliance document was prepared at the end of 2018-19 to provide a snapshot of compliance with Data Protection Legislation. This is to be prepared on an annual basis.</p> <p>6. SPPA Head of Security has achieved Practitioner certification for Data Protection (updated in 2018 to cover GDPR).</p>	
10. Business Continuity and Vital Records	<b>G</b>	<b>G</b>	<b>G</b>	Update required on any change	<p>1. SPPA continues to maintain a Business Continuity Plan (BCP) with regular testing and training with the output reported to the Audit and Risk Committee.</p> <p>Business Continuity testing during 2017-18 was facilitated by Police Scotland Counter Terrorism Advisors on the subject of a Flu Pandemic.</p>	<p>The Assessment Team recognise and commend the work SPPA have done to test the efficacy of the authority's Business Continuity Policy and to adjust processes in response to these tests.</p> <p>The Assessment Team thanks SPPA for information</p>

					<p>During 2018-19, training was organised to focus upon Incident Response Management following the 'Preparing Scotland' guidance</p> <p>SPPA have revised the format of the BCP which is now issued to key staff in the form of a grab bag.</p> <p>2. Additional resilience in Disaster Recovery has been improved following the installation of an <i>Arcserve</i> back-up and recovery solution for SPPA systems.</p> <p>3. Business Continuity risk is reviewed on a quarterly basis by SPPA's Risk Governance Group.</p>	<p>regarding Arcserve: <a href="https://www.arcserve.com/uk/">https://www.arcserve.com/uk/</a></p> <p>For more on review see under element 13 below.</p>
11. Audit Trail	<b>G</b>	<b>G</b>	<b>G</b>	<p>When a new electronic records solution is introduced to replace the shared 'G' drive for corporate records new record tracking facilities are likely to be introduced in the organisation. The Keeper requests that he is sent a copy of these when available to ensure that the SPPA submission reflects the current situation in the agency.</p>	<p>1. SPPA remains committed to introducing an electronic records management system to replace the existing G:Drive. A key focus of the procurement will relate to functionality that will assist adherence to SPPA's file retention policy.</p> <p>2. SPPA are currently investigating the adoption of eRDM to replace the G:Drive and improve the standard of records management. A scoping exercise will be undertaken during 2019-20. To date, a demonstration of eRDM has been held, however, due to the amount of change/capacity constraints on</p>	<p>The Keeper agrees that shared-drives are a 'Data Quality and Records Management risk' and acknowledges that SPPA are investigating a more controlled solution. This will be fundamental to the authority's records management provision and the Assessment Team will expect to see updates about this project in subsequent PURs.</p>



					<p>the Agency, it was decided to put implementation planning on hold.</p> <p>A separate project, with a much smaller scope is worthy of note. This will look at specifically, the control, management and policies around documents - specifically those which are served via the website (such as forms) but will also consider system generated documents. The output of the project will be an action plan for documents, which ultimately could act as a template approach for other documents, data and content held within folders.</p> <p>3. The SG Internal Audit Team have identified the G:Drive as a Data Quality and Records Management risk and are being routinely updated in respect to progress. The Keeper's amber 'improvement model' remains a key driver in the need to progress this project once business can accommodate this undertaking.</p>	<p>If an eRDM is adopted it is also likely to have a major effect on elements 4,5 and 6. When it is fully-rolled out the SPPA should consider resubmitting their Records Management Plan. PRSA says at section 5.6 "An authority may at any time revise its records management plan and submit the revised plan to the Keeper for agreement." The Keeper can request a re-submission under the Act but may choose not to.</p> <p>When (if?) SPPA is considering a formal re-submission please contact the assessment team to discuss what evidence would need to be supplied <a href="mailto:public_records@nrscotland.gov.uk">public_records@nrscotland.gov.uk</a> We will fully engage and support a section 5 re-submission. Happy to talk through the process at any time.</p>
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12. Competency Framework	G	G	G	<p>The Keeper commends SPPA's commitment to the appropriate training of all staff which will include the addition of records management competencies to the record manager's Personal Learning Plan. SPPA have agreed to share the records management learning objectives, when created, with the Keeper.</p>	<p>1. On an annual basis all SPPA staff undertake:</p> <ul style="list-style-type: none"> <li>• Data Protection Training (SG, online)</li> <li>• Responsible for Information (Civil Service Learning, online)</li> <li>• Counter Fraud and Bribery (Civil Service Learning, online)</li> </ul> <p>Completion is recorded within the staff member's Personal Learning Plan.</p> <p>2. In June 2017 SPPA Head of Security passed the examination for the 'Practitioner Certificate in Data Protection' (course delivered by PDP) this certificate was updated during 2018 to cover GDPR by undertaking further studies and examination.</p> <p>3. In September 2017, SPPA Head of Security undertook an Information Asset Owner's 'train the trainer' workshop hosted by the National Archives. The training provides access to a range of training modules that can be delivered to SPPA staff by Head of Security.</p> <p>4. SPPA Head of Security is currently considering undertaking the process for IRMS Accreditation as part of his continued development. Any</p>	<p>Training in information governance for appropriate staff is of vital importance when implementing an authority's Records Management Plan.</p> <p>The Assessment Team is pleased to acknowledge that SPPA are pursuing this in a structured and recorded way. This is to be commended.</p> <p>They particularly note the improvements noted here regarding the culture of information security (see element 8).</p> <p>The Assessment Team note the additional qualifications and training opportunities accessed by the key information governance officer in SPPA.</p>
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					recommendations from The Keeper's Office in respect to appropriate records management training would be welcomed.	
13. Assessment and Review	<b>G</b>	<b>G</b>	<b>G</b>	SPPA are committed to reviewing their RMP annually and that other related documents and policies are assessed as part of the Information Assurance schedule. The Keeper commends this approach and welcomes the creation of an Action Plan which reflects the commitments made in SPPA's plan. The Keeper would be interested in learning about the outcome of these reviews and wishes to be informed of any changes to policies following these reviews.	<p>1. SPPA continues its commitment to review the Records Management Plan on an annual basis. (SPPA CEO is now Penelope Cooper in post from July 2017).</p> <p>2. The results of the review are reported to the Audit and Risk Committee.</p> <p>The key tasks relating to the Head of Security role are captured within the an annual Business Plan.</p>	<p>The Act requires that an authority keeps its Records Management Plan under review.</p> <p>The Scottish Public Pensions Agency has a robust review mechanism in place and the Assessment Team acknowledge the receipt of the authority's Compliance Review, Information Risk Management Review, Leadership and Governance Review, Mandatory Requirements Review, Training Education and Awareness Review, and Through-Life Information Asset Measures Review.</p> <p>This provides the Assessment Team with the evidence they need to fully agree that SPPA are pursuing this element of their Records</p>

						<p>Management Plan appropriately.</p> <p>The SPPA have also shared their 'Head of Security Work plan'. This document shows actions, undertaken and planned, relating to Information assurance (including the PRSA); Cyber and Physical Security; Business Continuity and Data Protection. Actions have target dates. This is valuable evidence of progress in the authority and the Assessment Team thanks SPPA for sharing it.</p>
14. Shared Information	<b>G</b>	<b>G</b>	<b>G</b>	Update required on any change	<p>1. SPPA have circa 1,200 Employing authorities through which we have established data sharing agreements. This number fluctuates, so it remains a task to ensure agreements are established as a matter of routine</p> <p>2. Information Assets are registered using the Scottish Government's Information Asset Register. These assets are assigned to Information Asset Owners within the organisation and are reviewed annually.</p>	The Assessment Team thanks SPPA for this update which they have noted.

					<p>3. SPPA are undertaking steps to be included within the list of public bodies under the Digital Economy Act 2017 for schedules 7 and 8 (fraud and debt) that would enable greater data sharing between UK wide and devolved public bodies.</p>	
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## 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 24<sup>th</sup> September 2019. The progress update was submitted by Jonathan Sharp, Head of Security.

The progress update submission makes it clear that it is a submission for **Scottish Public Pensions Agency**.

### PRSA Assessment Team's Summary

The Assessment Team has reviewed the **Scottish Public Pensions Agency'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 Public Pensions Agency 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.

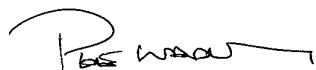
The Keeper cannot change the status of elements formally agreed under a voluntary submission, but he can use such submissions to indicate how he might now regard this status should the authority choose to resubmit its plan under section (5)(6) of the Act.

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

Based on the progress update assessment the Assessment Team considers that the **Scottish Public Pensions Agency** 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