

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

**Social Security Scotland**

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

**07 October 2022**

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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 Social Security Scotland. The outcome of the assessment and relevant feedback can be found under sections 6 – 8.

### **4. Authority Background**

Social Security Scotland is an Executive Agency of the Scottish Government. Social Security Scotland's responsibility is to ensure that devolved benefits are managed correctly and fairly, delivering those benefits to the 1.4 million people who rely on them. The Social Security Scotland Framework Document sets out the relationship between Social Security Scotland and the Scottish Government, and the accountability structures within which they operate.

<https://dgxmvz0tqkndr.cloudfront.net/production/images/general/Social-Security-Scotland-Framework-Document.pdf>

## 5. Assessment Process

A PUR submission is evaluated by the Act's Assessment Team. The self-assessment process invites authorities to complete a template and send it to the Assessment Team one year after the date of agreement of its RMP and every year thereafter. The self-assessment template highlights where an authority's plan achieved agreement on an improvement basis and invites updates under those 'Amber' elements. However, it also provides an opportunity for authorities not simply to report on progress against improvements, but to comment on any new initiatives, highlight innovations, or record changes to existing arrangements under those elements that had attracted an initial 'Green' score in their original RMP submission.

The assessment report considers statements made by an authority under the elements of its agreed Plan that included improvement models. It reflects any changes and/or progress made towards achieving full compliance in those areas where agreement under improvement was made in the Keeper's Assessment Report of their RMP. The PUR assessment report also considers statements of further progress made in elements already compliant under the Act.

Engagement with the PUR mechanism for assessment cannot alter the Keeper's Assessment Report of an authority's agreed RMP or any RAG assessment within it. Instead the PUR Final Report records the Assessment Team's evaluation of the submission and its opinion on the progress being made by the authority since agreeing its RMP. The team's assessment provides an informal indication of what marking an authority could expect should it submit a revised RMP to the Keeper under the Act, although such assessment is made without prejudice to the Keeper's right to adopt a different marking at that stage.

### Key:

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

Element	Status of elements under agreed Plan 23SEP20	Status of evidence under agreed Plan 23SEP20	Progress assessment status 07OCT22	Keeper's Report Comments on Authority's Plan 23SEP20	Self-assessment Update as submitted by the Authority since 23SEP20	Progress Review Comment 07OCT22
1. Senior Officer	<b>G</b>	<b>G</b>	<b>G</b>	Update required on any change.	There is no change to either the holder or the role. Mrs Richardson completed the 'Principles of being an Information Asset Owner' training in May 2021. This training was provided by the Scottish Government's Data Protection and Information Assets Team. Our other Deputy Directors have also undertaken this training. This training outlined their responsibilities with regards to the information assets in their respective areas.	Thank you for letting us know there have been no changes to this element, as well as an update on the post holder's training.  Update required on any change.
2. Records Manager	<b>G</b>	<b>G</b>	<b>G</b>	Update required on any change.	There is no change to either the holder or the role. The Corporate Records Manager is now supported by the Corporate Records Practitioner, Sarah Graham, who joined Social Security Scotland in January 2021. An Information Officer has also been recruited and started in January 2022. This increased capacity will allow work to progress in all areas of records management.	Thank you for letting us know there have been no changes to the named Key Contact. It is also great to hear that the records management team is expanding.  Update required on any change.
3. Policy	<b>G</b>	<b>G</b>	<b>G</b>	Update required on any change.	The Records Management Policy is overdue for review. This will be completed by end of May 2022. Once the review is	The Assessment Team thanks you for this update, and is contented to hear

					<p>completed it will be put to the newly formed Information Governance Group for information and approval.</p> <p>Work on redevelopment of Social Security Scotland's external website was delayed due to the pandemic. This has now been completed and we will work with our Communications colleagues to publish key documents, including the Records Management Policy once it has been reviewed, on the new website.</p> <p>The Records Management Team continues to meet regularly with the IMSO network and uses this opportunity to highlight the requirements of the Policy.</p> <p>Training on the use of eRDM has been delivered by the Corporate Records Manager to colleagues in Operations and Local Delivery. This training has been developed into a module by colleagues in Learning and Development. This module is delivered to all new starts in Operations and Local Delivery at induction. It will be rolled out across the rest of the organisation and delivered to all new starts. The initial target was to have this completed by the end of 2020 but due to resourcing issues as a result of the pandemic this has been delayed. It is anticipated that this will be completed by the end of December 2022.</p> <p>The Records Management Team will continue to work with colleagues in</p>	<p>that by the time this PUR has been finalised, the Policy review will have taken place. We look forward to seeing it on the website in due course.</p> <p>It is good to hear of continuing engagement with the IMSO network, as well as of the continuing promotion of the requirements of the Records Management Policy.</p> <p>For comments on the update on eRDM training, see Element 12.</p>
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					Communications to publicise the requirements of the Policy. This will include the publication of articles on the corporate intranet, Saltire, as well as the Line Manager Cascade which is distributed to all line managers in Social Security Scotland.	
4. Business Classification	A	G	A	<p>As the organisation matures we will investigate the possibility of creating our own IAR.” (RMP page 11). <b>The Keeper requests he is updated with regard to the idea of an in-house IAR should this project progress in the next year. The authority has committed to undertaking the Progress Update Review (PUR) process annually (see element 13) and this would be an ideal time to revisit developments like this.</b></p> <p><b>The Keeper agrees this element of Social Security Scotland’s Records Management Plan under ‘improvement model’ terms. This means that the authority has identified a gap in provision (public records in paper format lie outside the records management structure), but have developed a solution that will close this gap (adding the paper records, once identified, to eDRM). The Keeper agreement is conditional on his being updated as this work progresses.</b></p>	<p>The work to investigate the development of a new platform for the Information Asset Register (IAR) has been paused due to a focus on other priorities as a result of the pandemic and the rollout of the new disability benefits. It is hoped that this work can be re-started in the financial year 2022/23.</p> <p>In the absence of a new tool and due to the expansion of the Agency over the past year a lot of work has been undertaken to ensure that the IAR is up-to-date and that new assets have been identified and recorded. To do this, a network of Information Asset Managers (IAMs) has been established in business areas across the organisation. They act as points of contact for the Records Management Team when assets become due for review. The Records Management Team has created a tracker to identify when assets are due for review and proactively contact IAMs in advance of the review date to ensure that these assets remain up-to-date.</p> <p>The structure of the file plan is regularly monitored due to the continued growth of the Agency. New functions continue to be</p>	<p>Thank you for letting the Assessment Team know that the project to investigate the development of a new IAR platform has been postponed. However, it is reassuring to hear that the content of IAR has been a focus, as well as cross-organisational establishment of Information Asset Managers. It is understandable that the file plan is still being structured as the Agency grows. It is evident that Social Security Scotland is taking steps to avoid of the potential pitfalls of the gradual process through active liaison with the SG Records Management Team. This seems a pragmatic approach for a new organisation.</p> <p>It is understandable that</p>

					<p>added and the file plan needs to be relatively flexible to reflect these changes. The Agency Records Management Team maintains regular contact with the Scottish Government Records Management Team to ensure that changes are consistent with the Government-wide usage of eRDM.</p> <p>Regarding the small quantity of paper records created and maintained by Social Security Scotland, due to the pandemic and lack of staff access to these records this work has not been undertaken. This work is recognised as being a priority and it is anticipated that it can be taken forward once staff are able to return to office space. The Records Management Team will work with IMSOs in areas which use paper records to quantify these and add these to eRDM.</p>	<p>the pandemic has hindered the progress on the gap in provision identified (i.e. public records in paper format lie outside the records management structure), and that Social Security Scotland has not been able to work towards closing this gap. However, as good progress has been made elsewhere, the Team remain confident that this postponed work will be addressed as soon as practicable.</p> <p>This element will remain at Amber while the work is ongoing. We look forward to being updated on progress in consecutive PURs.</p>
<p>5. Retention Schedule</p>	<p><b>A</b></p>	<p><b>G</b></p>	<p><b>A</b></p>	<p>The Corporate Records Manager (see element 2) is responsible for creating a <i>Retention and Disposal Policy</i> alongside developing the <i>Retention Schedule</i>. <b>The Keeper requests that he is provided with a copy of this policy when available.</b></p> <p>Local arrangements exist for the retention of paper records <b>(however see under element 11</b></p>	<p>Work on creating the retention schedule has been delayed due to resourcing issues as a result of the pandemic and also due to organisational change. Since the Records Management Plan was originally submitted several new business areas have now been added. Procurement, Analysis and Insights, Clinical Operations and Chief Digital Officer are new functions which have been added to the Agency's portfolio. A lot of work has been undertaken with these areas to</p>	<p>Thank you for this update on Retention Schedules. It is understandable that the pandemic will have had an impact on the Agency's ability to immediately close the gaps identified in the Keeper's report. It does appear that progress has been made in other areas, however, and that the</p>

				<p>for tracking of these records).</p> <p><b>The Keeper agrees this element of the Social Security Scotland Records Management Plan under improvement model terms. This means that the authority has recognised a gap in provision and has put processes in place to close that gap. The Keeper’s agreement is conditional on his being updated on progress.</b></p>	<p>incorporate their records into the existing file plan and to incorporate them into the records management arrangements of the Agency. We have now identified IAMs and IMSOs in these business areas and will work with them to establish their retention requirements.</p> <p>A considerable amount of work has been undertaken with IMSOs in other business areas to identify and capture the retention requirements for their records and information. Once all business areas have returned their requirements, these will be quality assured for accuracy and to avoid duplication of entries.</p> <p>The Retention and Disposal Policy is still currently in draft and it is anticipated that it will be completed by the end of May 2022.</p>	<p>records management team is working hard to manage the new business areas in a growing organisation, and to keep track of these business areas’ retention requirements.</p> <p>As soon as the formalised Retention and Disposal Policy is in place, this PUR Element can be turned from Amber to Green to highlight progress made in this area; it will remain at Amber in the meantime.</p>
<p>6. Destruction Arrangements</p>	<p><b>A</b></p>	<p><b>G</b></p>	<p><b>A</b></p>	<p><b>Until the retention schedule is fully populated the destruction arrangements explained in the RMP cannot be agreed to be fully rolled-out (see below).</b></p> <p>Paper copies of sensitive or confidential documents and records must be disposed of using shredders (<b>However see under element 11 for tracking paper records</b>).</p> <p><b>The Case Management System has back-up functionality for business continuity purposes</b></p>	<p>See Element 5 for an update on progress on the retention schedule.</p> <p>Once staff start returning to the office in Summer 2022 the Records Management Team will work with IMSOs in the relevant business areas to ensure that paper records are represented on eRDM. This will allow for consistent management of paper and electronic records. The Records Management Team will then investigate whether there is a backlog of paper records to be destroyed due to the pandemic and, if so, ensure these are disposed of securely. The aim is for this work to be completed by</p>	<p>Thank you for this update on records destruction arrangements. Whilst it is understandable that progress on some key projects has been halted, and that records destruction arrangements are highly dependent on the completion of Retention and Disposal Policy (see Element 5), it is positive to hear that the work on paper records continues.</p>

				<p>(see element 10). Currently there is no retention applied to these backups. Social Security Scotland have recognised that this may represent a risk (for example retaining access to personal information longer than business need). The RMP states (page 13): “Work has already started on identifying a retention period for keeping the back-ups of the SPM system, but there is no timescale at present for the completion of this. When this work has been completed, we will inform the Keeper.”</p> <p>It is clear that this element is still a ‘work in progress’ the RMP states (page 13) “Social Security Scotland’s procedures are still being developed to ensure that records and information are not kept for longer than necessary. Once finalised these will enable us to comply with data protection legislation and reduce storage space. Social Security Scotland are developing an organisation-wide Retention Schedule (see Element 5) which will cover all records and information we create.”</p> <p>The Keeper agrees this element of Social Security Scotland’s Records Management Plan on ‘improvement model’ terms.</p>	<p>the end of December 2022.</p> <p>Social Security Scotland is aware of the continuing need to identify the retention period for back-ups of the SPM case management system. This work had been put on hold as a result of other priorities stemming from the pandemic. The Records Management Team will work with colleagues in the Social Security Programme and Chief Digital Office to identify and capture the retention periods of back-ups.</p>	<p>Thank you also for the update on the now-continuing work regarding the lack of retention applied to case management system back-ups. We look forward to being updated on how this work progresses in consecutive PURs.</p> <p>This Element will remain at Amber as Social Security Scotland continues to work towards closing the gaps identified in the Keeper’s report.</p>
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				<p>This means that the authority has identified gaps in provision, but are actively pursuing suitable actions to close those gaps. The Keeper's agreement is conditional on his being updated when appropriate. Social Security Scotland have committed to undertake the Keeper's progress Update Review (PUR) process (see element 13) and this would seem like an ideal opportunity to report on developments in this element.</p>		
7. Archiving and Transfer	A	G	A	<p>Social Security Scotland has entered into negotiations with NRS to develop a memorandum of understanding to formally agree the obligations on both the authority and the repository with regard to the transfer of records selected for permanent preservation.</p> <p><b>However, these negotiations have not been finalised. Partly this is due to the lack of a fully rolled-out Retention Schedule in Social Security Scotland (see element 5). The RMP states (page 16): "Further meetings will be required once the work on the retention schedule is finalised to determine which records should be selected for permanent preservation." However the Keeper is convinced that a formal</b></p>	<p>See Element 5 for update on progress on the retention schedule. The Corporate Records Manager has kept in touch with the NRS Client Managers to keep them informed and fully intends to enter into a transfer agreement once the retention schedule has been finalised.</p> <p>Social Security Scotland still intends to develop an Archiving and Transfer Policy but this is dependent upon the timescales for the completion of the retention schedule and discussions with NRS Client Managers. We will finalise the draft by end of May 2022 and seek approval from the Information Governance Group.</p> <p>Social Security Scotland has also engaged with the NRS Web Archiving Team and our old website was captured in the first half of 2020. We intend to continue working with</p>	<p>The Team thanks you for this update. It is clear that progress is being made in terms of policy development, transfer agreement and web archiving arrangements.</p> <p>While the Retention Schedule is still work-in-progress, and therefore a viable transfer agreement cannot be entered into, this Element will remain at Amber. The Assessment Team is encouraged to see that work on this continues, and we look forward to further updates in consecutive PURs.</p>

				<p><b>agreement should be forthcoming and is happy to agree this element under 'improvement model' terms on that basis.</b></p> <p>The Keeper notes that Social Security Scotland intend to develop an <i>Archiving and Transfer Policy</i>. There is a tentative December 2020 target for this policy document. <b>The Keeper request that he is provided with a copy of this when available.</b></p> <p><b>The Keeper agrees this element of Social Security Scotland's RMP on 'improvement model' terms while awaiting sight of a formal memorandum of understanding between the authority and NRS.</b></p>	<p>them to capture future iterations of the new website. We will also liaise with colleagues in Communications to ensure this takes before the end of December 2022 and thereafter on a regular basis.</p>	
8. Information Security	G	G	G	Update required on any change.	<p>Social Security Scotland is aware of the importance of protecting its information from unauthorised access. As a relatively new organisation we currently comply with a number of Scottish Government information security policies, standards and procedures. We also use SG IT hardware and systems. A number of information security policies more specific to our needs have now been developed and are in the final steps of the ratification process. These will include an Information Security Policy, a Data Handling, Storage and Disposal Policy, and an Acceptable Use Policy.</p>	<p>The Assessment Team thanks Social Security Scotland for this thorough update. The development of a suite of Information Security policies is a very reassuring step, as is the pursuing of a Cyber Essentials and Cyber Essentials Plus certification.</p> <p>It is evident from the examples given that Social</p>

					<p>Social Security Scotland is now seeking Cyber Essentials and Cyber Essentials Plus certification in 2022. The Cyber Essentials Scheme is a Government backed, industry supported scheme to help organisations protect themselves against common online threat. With the recent expansion of the Cyber Essentials scope to include Cloud Services, achieving Cyber Essentials and Cyber Essentials+ will provide a greater level of assurance that basic security control is in place to protect Social Security Scotland’s information and supporting digital services.</p> <p>Social Security Scotland is pro-active in its approach in assessing and treating information security risk using internationally recognised standards. A new methodology from the Information Security Forum (Information Risk Methodology 2) has been adopted by Social Security Scotland and will see increased use across 2022. Where deemed necessary, infrastructure and software is subject to a point in time IT Health Check (Penetration and configuration reviews). Through conducting IT Health Checks, vulnerabilities can be identified and external assurance gained of technical control being in place.</p> <p>Information security risks are currently documented within Operational Readiness Statements and consolidated within relevant risk treatment plans. A weekly security risk</p>	<p>Security Scotland remains proactive in its approach to information security risks, both in the digital realm and in its buildings.</p> <p>For comments on staff training, See Element 12.</p> <p>The Assessment Team has no concerns over this Element. Update required on any change.</p>
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				<p>working group is chaired by the Chief Information Security Officer which provides oversight of vulnerabilities and risks identified within systems, services and key business processes.</p> <p>Social Security Scotland currently records its information assets within the Scottish Government Information Asset Register (IAR). Social Security Scotland has appointed its five deputy directors as Information Asset Owners (IAOs). Further to this, a Senior Information Risk Owner has been appointed. A process has been established by the Records Management Team to maintain a current list of information assets by appointing Information Asset Managers across each of Social Security Scotland's divisions.</p> <p>All employees are mandatorily required to undertake Protecting Information and Data Protection e-learning training. This annual awareness training reminds employees of the importance of data security and associated risks. In addition, cyber and information security awareness training is offered to all new and incumbent members of staff. This training includes but is not limited to Clear Desk Policy, Data Management, Physical Security and Environmental Controls, and Email Scams.</p> <p>Social Security Scotland has a number of physical controls in place to ensure the security of staff and information. Our</p>	
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	G	G	G		<p>buildings estate currently extends across four sites – 220 High Street, Glasgow; Agnes Husband House, Dundee; Enterprise House, Dundee and Dundee House, Dundee. As a minimum, all buildings require security passes to access the building and most have an onsite security presence at the entrance. Within the buildings, as and where required, internal doors protecting sensitive areas also require additional building pass permission to open.</p> <p>Hard copy information is stored securely in locked cabinets which are accessible only to those teams which require access. Staff are also expected to comply with Clear Desk Policy and are provided with lockers to store personal information and sensitive business information.</p>	
9. Data Protection	G	G	G	Update required on any change.	<p>Social Security Scotland is committed to processing the personal data that it collects from both its clients, staff and stakeholders for the purposes of carrying out its functions in accordance with its obligations under data protection legislation.</p> <p>Social Security Scotland carries out data protection activities in respect of Scottish Ministers’ responsibilities for social security functions. Scottish Ministers’ registration as a controller with the Information Commissioner’s Office includes Social Security Scotland in the same way as all other organisations which form part of the Scottish Government. The Scottish</p>	<p>Thank you for this thorough update on Element 9. The Assessment Team is reassured that Social Security Scotland continues to meet the requirements of this Element, but it is clear from this update and the examples given that it continues to take steps to continuously improve its Data Protection provision.</p> <p>Update required on any</p>

					<p>Government's Data Protection Officer (DPO) satisfies the legal requirement to appoint a DPO.</p> <p>In recognising that Executive Agencies carry out their functions at arm's length from central government, Social Security Scotland has entered into a MoU with Scottish Ministers. This describes how Social Security Scotland will meet and support Scottish Ministers' obligations for complying with data protection legislation. The MoU was most recently revised and updated in February 2022. Social Security Scotland has a Data Protection and Information Governance lead to lead on the agency's data protection responsibilities. Jim O'Neill has filled this post since June 2021 and regularly engages with Scottish Ministers' DPO on data protection matters. The Data Protection and Information Governance lead is supported by a data protection team, consisting of 7.8 FTE at February 2021.</p> <p>In accordance with the MoU, Social Security Scotland is developing its own data protection policy which will be specific to and tailored to the agency's functions.</p> <p>All staff are required to complete mandatory Data Protection e-learning on induction. They must also retake the e-learning course annually. The e-learning software records who has completed this training. Completion and success rates are reviewed on a</p>	<p>change.</p>
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					<p>monthly basis and reminders are sent to those who have yet to complete it, with information on completion rates provided to the agency’s recently established Information and Data Governance Groups.</p> <p>As its data protection team has moved to full resourcing in this financial year, Social Security Scotland has developed its data protection functions to ensure it is:</p> <ul style="list-style-type: none"> <li>• continuing to document and maintain its Record of Processing Activities;</li> <li>• complying with privacy by design by conducting Data Protection Impact Assessments, including the development of an approach more tailored to the Agency’s requirements;</li> <li>• maintaining Data Sharing Agreements and accurate records of any data sharing initiatives through engagement with the Social Security Programme Information Governance team and others;</li> <li>• managing personal data breaches;</li> <li>• processing data subject requests;</li> <li>• maintaining privacy notices.</li> </ul> <p>The data protection team has also established an assurance function which is carrying out data protection health checks of the Agency’s processing of personal data in order to produce an understanding of data protection compliance and opportunities for risk management and continuous improvement.</p>	
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					All staff in the data protection either hold or are working towards a professional qualification in data protection.	
10. Business Continuity and Vital Records	A	G	A	<p>The work on creating departmental business continuity plans is ongoing. The RMP states (page 23) “Each business area will develop a Business Continuity Plan. A network of Business Continuity Officers is being created to assist with this.” The RMP indicates a target for these local plans to be developed by the end of December 2020. The Keeper assumes there will be a period of testing and staff training in once these plans are approved. The Keeper will expect to see evidence that staff have easy access to business continuity procedures when rolled-out.</p> <p>The Keeper has been provided with a draft <i>Business Continuity Policy</i> (draft v2.0, October 2019) as an indication of the points that might be expected in the final approved version. The Keeper agrees that this draft policy adequately considers the recovery of records in an emergency.</p> <p>This element receives an amber RAG status while this work is</p>	<p>Social Security Scotland’s Business Resilience Team has established a number of processes to assess and mitigate potential threats.</p> <p>Social Security Scotland’s Business Resilience team have developed and implemented a Business Continuity Framework. It is closely aligned to the International Standard ISO22301: 2012. This provides us with an organisation-wide approach to the identification and management of potential threats. It also outlines our approach to recovery in the event of an incident that interrupts ‘business as usual’.</p> <p>To support the outcomes of the Framework, each business area will develop a Business Continuity Plan. A network of Business Continuity Officers has been created to assist with this, and training is underway. To date, over half of the identified teams have received the necessary training, and we anticipate all Business Continuity Plans will be signed off by early summer 2022.</p> <p>In addition, we have established a Major Incident Framework, and a network of senior leaders comprising a Major Incident Response Team. This document</p>	<p>The Assessment team thanks you for this update on the development and implementation of a Business Continuity Framework and Major Incident Framework, both of which are very worthwhile endeavours in terms of disaster-preparedness.</p> <p>Thank you also for the update regarding the development of a Business Continuity Plan for each business area.</p> <p>This Element remains at Amber until the Business Continuity Plans have been finalised.</p>

				<p>progressing.</p> <p>The Keeper can agree this element of Social Security Scotland's RMP under 'improvement model' terms. This means that the authority has identified a gap in provision (in this case that local business continuity plans are not yet operational) and has explained to the Keeper appropriate procedures to close that gap. The Keeper's agreement is conditional on his being kept up-to-date as the project progresses. Social Security Scotland have, elsewhere committed to undertake the Keeper's Progress Update Review (PUR) annual reporting process. This would be an ideal opportunity to update the Keeper on the business continuity situation.</p>	<p>ensures that we can react to any large scale incident that threatens our people, clients, service delivery, premises, data, or reputation.</p> <p>The vast majority of Social Security Scotland's vital records are held electronically. The local Business Continuity Plans will cover the IT systems used by each business area. Vital records will be identified in the retention schedule and be built in to each area's Business Continuity Plan, with detailed records of access rights, backup procedures, and storage locations.</p> <p>All records and data held on eRDM and SPM are subject to daily back-up and associated recovery procedures.</p> <p>At present, there are not thought to be any paper records considered to be vital. The continuing work to develop the retention schedule will identify any vital paper records. If any are identified, measures will be created to protect and recover these in the event of an incident.</p>	
11. Audit Trail	A	G	A	<p>Social Security Scotland have informed the Keeper that "At present there is no method for tracking the movement of paper records. The teams who create and use paper records are relatively small as are the quantities of paper records. We agree that it would be sensible to put in place an ability to</p>	<p>Due to the impact of the pandemic and the requirement for the vast majority of staff to work from home this work has not been progressed. Social Security Scotland fully intends to resume this work when staff are able to return to office buildings. The Records Management Team will work with IMSOs in business areas who maintain paper records to quantify the extent of</p>	<p>The Assessment Team thank Social Security Scotland for this update and acknowledge that the impact of the pandemic has halted progress in paper records' audit trail management. We are, however, pleased to hear</p>

				<p>track paper records. As part of the work to develop the retention schedule the Corporate Records Manager will work with the teams using paper records to develop location trackers which meet our requirements. It is thought that this could be easily achieved. As identified under Element 4, we are also actively considering the itemisation of files on eRDM for these paper records.”</p> <p>The Keeper can agree this element of Social Security Scotland’s RMP under ‘improvement model’ terms. This means that the authority has identified a gap in provision (in this case that paper records are not yet adequately tracked) and has explained to the Keeper appropriate procedures to close that gap. The Keeper’s agreement is conditional on his being kept up-to-date as the project progresses.</p>	<p>these, record these on eRDM and develop a method for tracking these. It is anticipated that staff will return to offices in Summer 2022 and it is hoped that the above work can be completed by the end of December 2022.</p> <p>Work continues to publicise the requirements of the Document Naming and Control Policy and the importance of complying with it. Regular spot checks on files within eRDM will be undertaken to measure compliance with the Policy. The Records Management Team will then work with colleagues in business areas in which issues are identified to encourage best practice.</p>	<p>that Document Naming and Control Policies are continuing to be publicised, and compliance with these policies monitored through spot checking with regard to electronic records.</p> <p>This Element will remain at Amber while this work on paper records is ongoing. We look forward to being updated on this in consecutive PURs.</p>
12. Competency Framework	A	G	A	<p>Some training programmes are yet to be fully rolled-out. For example the RMP states that “Social Security Scotland will develop records management training to be delivered at induction...This training will make staff aware of the Records Management Policy</p>	<p>Social Security Scotland is committed to the training and development of staff with records management responsibilities.</p> <p>eRDM upskilling training, in addition to the mandatory e-learning module, is delivered to colleagues in Client Services Delivery. This training is delivered by Learning and</p>	<p>Thank you for this update on staff competencies and training provided, especially with regard to records management training, eRDM upskilling, and IAO training. The records management</p>

				<p>and their responsibilities under it.” (RMP page 8). “IAO’s will undertake relevant training to ensure they are aware of their responsibilities for information assets in their area.” (RMP page 18). This in response to a commitment in the <i>Records Management Policy</i> (see element 3) that “All Social Security Scotland staff will: receive training so they are aware of their records management responsibilities” (<i>Records Management Policy</i> section 11). “It is anticipated that this training should be rolled out by the end of 2020.” (RMP page 8).</p> <p>The Keeper agrees this element of Social Security Scotland’s Records Management Plan under ‘improvement model’ terms. This means that the authority has identified a gap in provision (in this case that a suite of training programmes is not fully rolled-out), but have put process in place to close that gap. The Keeper’s agreement is conditional on his being updated as these training developments are implemented.</p>	<p>Development colleagues. We are looking to roll this induction training to all new colleagues. It is anticipated that this will be in place by the end of December 2022.</p> <p>All five of Social Security Scotland’s Deputy Directors have recently completed their Information Asset Owner (IAO) training ‘The Principles of being an IAO’. This was delivered between November 2021 and January 2022 by the Scottish Government Data Protection and Information Assets team.</p> <p>The Corporate Records Practitioner has recently completed an online records management module through the University of Dundee. The Information Officer is booked on the Practitioner Certificate in Scottish Public Sector Records Management.</p> <p>The Records Management Team is looking at ways to provide the IMSO network with more structured training and upskilling.</p> <p>A records management competency framework in currently being drafted to capture the differing levels of training needs within Social Security Scotland. It is anticipated that this will be finalised by the end of May 2022.</p>	<p>competency framework currently being drafted is a very positive step in the longer term, and should assist Social Security Scotland to identify and keep track of the relevant training requirements at different levels and in different branches of the organisation.</p> <p>It is clear that Social Security Scotland has worked hard towards closing the gap in its records management staff training provision. However, it is acknowledged that as the eRDM induction training for all staff is yet to be fully rolled out due to delays caused by the pandemic, this PUR Element will remain at Amber while this work is ongoing.</p>
<p>13. Assessment</p>	<p>G</p>	<p>G</p>	<p>G</p>	<p>Update required on any change.</p>	<p>We will develop a Records Management Assurance Framework. This will be used to measure our progress against our aims. We</p>	<p>Thank you for letting the Team know that a Records Management</p>

and Review					will liaise with colleagues in Corporate Assurance to help develop this. We aim to have this in place by the end of December 2022.	Assurance Framework is being developed. We look forward to hearing updates in consecutive PURs.
14. Shared Information	G	G	G	Update required on any change.	No change to report.	Update required on any change.
15. Public Records Created or Held by Third Parties	A	G	A	<p>Social Security Scotland currently have an arrangement with the Department of Work and Pensions (DWP) on an interim basis until such time as Social Security Scotland is able to carry out the function. DWP is a UK Public Authority not subject to the Act.</p> <p>The arrangement between Social Security Scotland and DWP is governed by formal agreements (a sample of which the Keeper has seen). However, it is recognised that records management provision is not sufficiently robust in these agreements and the authority has committed to address this.</p> <p><b>The RMP states (page 31)</b>  <b>“There is no specific records management provision built in to these agreements, such as retention periods for records currently stored on DWP systems.”</b></p> <p>Social Security Scotland have</p>	No change to report.	This Element will remain at Amber while this work is ongoing. We look forward to being updated on this in consecutive PURs.



			<p>committed to ensure relevant clauses are inserted at the next review of these agreements. It would be the intention to use the Scottish Council on Archives records management guidance for third parties as a template. However, they point out that it is possible there will be no such review as the function might naturally fall in-house before that time cancelling the contract.</p> <p><b>The Keeper agrees this element of the Social Security Scotland RMP under improvement model terms. This means that they have recognised a gap in provision (in this case that the contract, under which a third party carries out a function of Social Security Scotland, does not impose sufficient records management assurances) and have explained to the Keeper a commitment to rectify the situation. This agreement is conditional on his being updated on the situation with DWP at the time of Social Security Scotland's first PUR (see element 13)</b></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 12<sup>th</sup> April 2022. The progress update was submitted by Jim O'Neill, Data Protection and Information Governance Lead.

The progress update submission makes it clear that it is a submission for **Social Security Scotland**.

The Assessment Team has reviewed Social Security Scotland's Progress Update submission and agrees that the proper record management arrangements outlined by the various elements in the authority's plan continue to be properly considered. The Assessment Team commends this authority's efforts to keep its Records Management Plan under review.

### General Comments

Social Security Scotland 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 Social Security Scotland 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

A handwritten signature in blue ink that reads "Iida Saarinen". The signature is written in a cursive style and is positioned above the printed name and title.

Iida Saarinen  
Public Records Support Officer