

The Public Records (Scotland) Act 2011

Police Scotland

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

29 March 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 **Interim** 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 **Police Scotland**. The outcome of the assessment and relevant feedback can be found under sections 6 – 8.

4. Authority Background

Police Scotland was formally established on 1 April 2013 and is responsible for policing across the length and breadth of Scotland, some 28,168 square miles. The Service is led by Chief Constable Iain Livingstone QPM and comprises police officers, police staff and special constables who are working together to deliver the best possible policing service for the people of Scotland. The Chief Constable is supported by a command team of 3 Deputy Chief Constables, a Deputy Chief Officer 9 Assistant Chief Constables and 5 Directors.

Police Scotland's purpose is to improve the safety and wellbeing of people, places and communities in Scotland.

There are 13 local policing divisions, each headed by a Local Police Commander who ensures that local policing in each area is responsive, accountable and tailored to meet local needs. Each division will encompass response officers, community officers, local crime investigation, road policing, public protection and local intelligence.

The corporate headquarters of Police Scotland is based at Tulliallan in Fife which is also where the Scottish Police College is based, the training home of Police Scotland.

Police Scotland took over responsibility for policing in Scotland from the eight former police forces, the Scottish Crime and Drug Enforcement Agency and the Association of Chief Police Officers in Scotland.

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		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
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				request that they are updated as work on this element progresses.			Keeper on this basis.
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Progress Update Review (PUR) Template: Police Scotland

Element	Status of elements under agreed Plan, Dec 2014	Status of evidence under agreed Plan, Dec 2014	Progress assessment status, Jan 2019	Keeper's Report Comments on Authority's Plan, Dec 2014	Self-assessment Update as submitted by the Authority since Dec 2014	Progress Review Comment, (9 January 2019)
1. Senior Officer	G	G	G	Update required on any change	Senior Officer responsibility has been conferred to Assistant Chief Constable Alan Speirs who is a member of the Force Executive. His remit also includes Chair of the Information Governance Board and he is the Senior Information Risk Owner.	The Keeper thanks the authority for keeping him informed of changes to personnel under this element, and for supplying supporting evidence. Update required on any future change.

					This was confirmed to the Keeper in a letter dated 11 May 2018.	
2. Records Manager	G	G	G	Update required on any change	In the submitted Records Management Plan for Police Scotland, it was indicated that the Head of Information Management would act as the single point of contact for the Keeper as well as hold overall responsibility for Records Management within Police Scotland. This was reverted back to being the responsibility of the Records Manager in 2016. In October 2017 a new Records Manager, Joe Bartoletti, took up post and the Keeper was informed of this via a letter dated 27 October 2017.	The authority has been diligent in keeping the Keeper informed of changes under this element, and in providing appropriate supporting evidence. The Keeper thanks the authority for informing him of change. Update required on any future change.
3. Policy	G	G	G	Update required on any change. The Keeper would welcome updates on the progress of the	ACC Alan Speirs is leading on a review of all Police Scotland Standard Operating Procedures (SOPs). All SOP	The authority achieved the Keeper's agreement under this element in 2014 with a comprehensive policy document that included a suite of

				<p>authority towards standardising its procedures.</p>	<p>owners have been required to apply a risk assessment to each SOP within their business area by using a standard Risk Matrix that has been supplied with guidance from Policy Support.</p> <p>This will allow PSoS to assess what documents need to remain as SOPs and which ones can either be amalgamated with others or become guidance / reference documents.</p> <p>Further to the review above, a number of SOPs have been reviewed and updated due to changes in legislation and operational requirements. For instance, the ICT Systems Development SOP originally provided as evidence is due to be replaced by an Information Governance SOP.</p>	<p>Standard Operating Procedures. It is entirely appropriate and commendable that the authority is reviewing this Policy and all relevant SOPs. Adopting a risk based approach to this review is to be further commended as a robust methodology.</p> <p>The Keeper assumes that until this process has concluded and all new SOPs are in place, the authority's records and information continues to be managed under the current SOPs agreed by him in Dec 2014.</p> <p>The assessment team thanks the authority for informing it of the comprehensive review. The Keeper will look forward to receiving the new policy, and all relevant SOPs, when the review has concluded.</p> <p>Were this a formal resubmission of the authority's plan under s5(6) of the Act this element would, with the support of relevant evidence confirming the policy and SOPs, attract a green rating.</p>
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4. Business Classification	A	A	A	<p>The RMP states that progress towards developing the classification scheme will be reviewed annually and that the Keeper will be kept informed of this.</p> <p>The Keeper would like to receive updates concerning the standardisation of the classification scheme and its implementation along functional rather than divisional lines.</p> <p>The Keeper can agree this element on an 'improvement model' basis provided he is kept informed of progress towards</p>	<p>Police Scotland created a Data Protection Reform Project, which commenced in 2017 (see Element 9). Its remit was to carry out an information audit and populate the Force's newly developed Information Asset Register (IAR). A validation process is currently being undertaken by the Project Team and Records Management to refine the scope and content of this register. This includes aligning all entries on the IAR to the functional elements of the draft Police Scotland Business Classification Scheme (BCS). This will allow Police Scotland to view its information assets by creating function and will also allow the draft BCS to be further refined and thereafter finalised. This will lead to the creation of version 1.0 of the Police Scotland BCS.</p>	<p>It is clear that the authority is committed to delivering a robust IAR. It is further clear that this is being designed to reflect the functional ambitions of the solution that was under development and agreed by the Keeper in 2014. There is no question such a comprehensive solution will benefit the authority and will, when operational and supported by the necessary evidence, achieve the Keeper's agreement. The assessment team recognises the considerable effort and resource needed to achieve this solution while simultaneously migrating users to a unified IT network. The additional control and security that will be gained from the proposed file plan and folder management is without doubt.</p> <p>It is clear that the authority is investing heavily in work to streamline information governance</p>

				<p>developing a business classification scheme.</p>	<p>In addition to the validation work on the IAR noted above, Police Scotland is in the process of migrating all users, divisions and departments to a single Police Scotland IT network, which has closely involved the Records Management team. The top 3 levels of the new file plans on shared drives are restricted so that users cannot create new folders. This allows Records Management to agree to a standard file plan template for divisions and departments and in the future to approve or modify any requested alterations. At the point of migration this has ensured that divisions and departments are broadly aligned with the draft BCS and the creation of a national local policing file plan that is standard for all divisions.</p>	<p>and maximise the benefits of this for operational purposes, business efficiencies and compliance goals.</p> <p>The assessment team commends the authority on its commitment to improve and looks forward to receiving further updates on this essential work.</p> <p>Were this a formal resubmission under section 5(6) of the Act this element would attract an amber rating indicating that he agrees it under improvement.</p>
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					The new network also provides the tools and impetus for improving the governance arrangements in place to further refine the overall file plan as the BCS work develops.	
5. Retention schedule	G	G	G	<p>The RMP states that the procedures for recording the disposal of records will be standardised and distributed to staff as a standard operating procedure.</p> <p>The RMP also states that the schedule will be reviewed annually to ensure that it is fit for purpose and any changes will be conveyed to the Keeper.</p> <p>The Keeper agrees that Police Scotland</p>	<p>In order to support Police Scotland's Transformation Programme, an Interim Records Officer was recruited in April 2018. This post has been filled by a qualified information management professional with experience in archives and records management roles. Part of the remit of this role includes a full review of the Police Scotland's Record Retention SOP as well as overseeing its archiving and transfer arrangements.</p> <p>The Interim Records Officer has reviewed Legacy Force retention rules against the current Police Scotland</p>	<p>The authority achieved the Keeper's agreement for its retention arrangements in 2014, when it was only two years old. The authority has changed in the intervening period and has, correctly, taken the opportunity in this time to critically review legacy and current practice. This has allowed the authority to identify inconsistencies. The assessment team commends the authority for this work and for its commitment to ongoing scrutiny and improvement.</p> <p>The commitment to engage a professional records manager, to resource the review under that manager and to act upon findings and recommendations is good. This</p>

				<p>has an operational retention schedule in place and welcomes the commitment to continually review this as the organisation continues to standardise its policies, practices and procedures.</p>	<p>retention rules. This has identified all inconsistencies between legacy and current practice, resulting in a table of rules - broken down by function - that require to be standardised.</p> <p>Currently, work is ongoing within the People & Development department – whose HR function relates to approx. 40% of legacy rules - to discuss harmonising legacy and current retention rules.</p> <p>This work has been very timely as a project has just commenced to manually weed all legacy force paper personnel records. To date 5,000 of 25,000 files have been weeded and destroyed in line with our records retention schedule. This process allowed PSoS to develop an approach to weeding legacy files and to tackle the backlog of files.</p>	<p>has clearly benefitted the authority and has yielded tangible results, not least in the managed destruction of a substantial quantity of legacy paper files.</p> <p>Under a formal resubmission of the plan, with supporting evidence of authority-wide application of the scheduling arrangement, this element would attract a green rating.</p>
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					<p>In addition to the full review noted above, changes to the retention schedule can be requested by Divisions and Departments. These queries are raised through ongoing use of the SOP as opposed to a yearly in-depth review at current. The intent is to get the SOP to be more of a rolling review type of document.</p> <p>Lastly, part of the work being done with the Information Asset Register aims to integrate retention rules within it.</p>	
6. Destruction Arrangements	G	G	G	Update required on any change. The Keeper would like to hear about any changes in destruction arrangements	<p>Paper Records Under a new national waste management contract, replacing several legacy arrangements. This includes secure and lockable confidential waste cabinets</p>	The updated arrangement is robust and provides for secure storage and destruction of paper waste, which is certificated by the service provider. The authority has further updated its arrangements for the classification

				<p>following the review of existing provisions.</p>	<p>that have been installed in the majority of Police Scotland offices. These cabinets are emptied regularly and documents destroyed on the premises by the supplier under supervision of officers / staff.</p> <p>This new contract also provides for national ad-hoc batch destruction of records via on-site shredding by the company, which individual business areas can request through a central facilities management service-desk.</p> <p>Destruction certificates are provided by the supplier in either instance.</p> <p>Electronic The Secure Destruction and Disposal of Data SOP has been reviewed and updated and the Government Protective Marking Scheme SOP has been replaced by the</p>	<p>of e-records, which includes provisions for the methodical identification and weeding of information. Work appears to be ongoing to embed the weeding mechanism. Again, the assessment team applauds the authority for critically reviewing its procedures, but also for resourcing the work to update and make more robust the destruction arrangements that achieved agreement in 2014.</p> <p>Achieving a green rating for this element under a formal resubmission would require supporting evidence showing the updated systems and procedures are operational across the authority. In addition the Keeper would require confirmation that the authority remains compliant with regard to the arrangements in place for the destruction of hardware and of back-ups.</p>
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					Government Security Classification SOP. In addition, work is ongoing to ensure that weeding is a standard feature of any system implemented and to replace or remediate those systems where automatic weeding according to predefined retention rules does not exist.	
7. Archiving and Transfer	G	A	A	<p>The RMP commits Police Scotland to updating the documents which governs the transfer arrangements to provide a more standardised approach and to create documentation where none currently exists.</p> <p>The Keeper would welcome updates on Police Scotland's audit of historical</p>	<p>As previously noted under the Element 5 update, an Interim Records Officer was hired as part of the Force's ongoing Transformation Programme. This post was filled in April 2018 by a qualified information management professional with experience in archives and records management roles. Part of the Records Officer's remit is to oversee and improve the archiving and transfer arrangements of the Force.</p>	<p>The authority is clearly keen to progress work under this element. The current review, being conducted by the newly appointed records manager, has identified the complexity of the solution required, which involves liaising and negotiating with several archive providers. This is not a straightforward task and it will require time and a good deal of flexibility, and possibly diplomacy, to deliver a comprehensive solution. Considerable work has already been undertaken and this remains ongoing.</p>

				<p>records currently in their custody, the standardisation of procedures for the transfer of archives, and the implementation of a solution for internal archiving of sensitive records.</p> <p>Police Scotland has agreed in principle to deposit archival records of the unified service dating from 1 April 2013 and later to the National Records of Scotland (NRS). The RMP states that a formal transfer agreement will be developed to set out transfer arrangements.</p> <p>The Keeper can agree that the arrangements for the</p>	<p>Police Scotland has continued to audit historical records currently in its custody as part of a wider review of records. This has resulted notably in additional deposits being made to the Lothian & Borders Police Archive held by City of Edinburgh Council; the compilation of a detailed item level list of records to be transferred to the three local authority archives that serve the areas originally covered by the legacy Tayside Constabularies; and ongoing deposits of Strathclyde Police records made to Glasgow City Archives.</p> <p>A single Police Scotland deposit agreement has been drafted by the Interim Records Officer to standardise the terms of new deposits to local authority archives and also to update, confirm or establish a formal agreement for existing holdings within local authority</p>	<p>It is correct that the authority seeks to deliver this solution in stages and to deal with legacy records, to be deposited with Scotland’s local authority archive service, as a priority. The assessment team commends the proposal for a standard agreement which seeks to satisfy both parties in relation to access and ownership issues.</p> <p>Bringing the proposed solution to fruition will take time. The assessment team, however, recognises that the commitment to deliver such a solution appears to exist. The compliance statement makes clear that resource has been allocated and that work to deliver a comprehensive solution, including for records bound for the NRS, is ongoing.</p>
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				<p>permanent preservation of records selected for archiving has been considered by the authority. He recognises that Police Scotland has inherited the responsibility for predecessor bodies' arrangements and is convinced of their commitment to improve and standardise these procedures, but requests that a formal MoU is progressed for the transfer of archival records from the new body to NRS. He therefore requests that he is kept informed of progress.</p>	<p>archives. When implemented, this agreement will standardise and clarify terms of ownership, access restrictions and on-going access procedures to closed records.</p> <p>The Interim Records Officer will begin to make contact with the relevant local authority archives to ensure all existing deposit agreements are updated/confirmed/established as appropriate.</p> <p>Currently, any archive records unsuitable for transfer to external archives are managed by Police Scotland and work is ongoing to standardise this.</p> <p>The Interim Records Officer also has the task of progressing the formal MoU for the transfer of archival records to NRS. However, the priority has been on updating</p>	
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					<p>deposit agreements for existing and pending local authority archive deposits as over time Police Scotland will no longer hold any Legacy Force records and focus can be turned to Police Scotland historical records.</p> <p>A MoU with NRS is a priority as records relating to the Association of Chief Police Officers in Scotland (ACPOS) have already been transferred in 2015 and more will follow suit, but it is only logical to bring to a conclusion the work with local authority archives and then focus on the ongoing relationship with NRS.</p>	
8. Information Security	G	G	G	Update required on any change. The Keeper commends the authority's commitment to staff training in information security issues and would welcome	The Force's Information Security Policy was subject to review and minor changes in 2017: it continues to articulate the Force's commitment to protect information using personal, physical, procedural	It is evident that the authority continues to take information security very seriously. It works to ensure all policies and procedures are updated and remain fit for purpose.

				<p>updates on these sessions.</p>	<p>and technical controls. The suite of Standard Operating Procedures (SOPs) that support the policy have been subject to updates:</p> <p>As mentioned in the update for Element 3, all of our SOPs have been updated to reflect changes to GDPR and this includes Information Security SOPs.</p> <p>The Information Security SOP was revised to reflect changes to current standards in 2017 and recently updated to reflect the introduction of passphrases rather than passwords within the Force for user accounts.</p> <p>The ICT user Access and Security SOP has undergone change to reflect standardisation of user account retention across the Force.</p>	<p>Update required on any future change.</p>
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					<p>The Security Incident Reporting and Management SOP has had its name changed to 'Information Security Incident Reporting' and has been updated to include a data loss reporting process for GDPR.</p> <p>The Government Protective Marking Scheme SOP was subject to major review and re-naming as Government Security Classification (GSC) SOP to reflect the introduction of the new scheme in 2017. It has since had a further update to introduce the roles and responsibilities of authors of documents within the Police Scotland Record Set.</p> <p>The Force has continued to provide Information Security training as part of Information Management induction sessions for all new recruits. The Information Assurance team ensures that those who</p>	
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					<p>fail to attend these sessions have IT access removed until they do so.</p> <p>The Force has achieved the Government backed Cyber Essentials Plus certification in 2018 – a robust independent verification of our cyber security preparedness.</p>	
9. Data Protection	G	G	G	<p>Update required on any change. The Keeper commends the authority’s commitment to staff training in data protection issues and would welcome updates on these sessions.</p>	<p>Police Scotland underwent an ICO Audit in 2016-17 and the ICO issued a number of recommendations. Police Scotland undertook to implement improvements, which have been reported to and assessed by ICO in 2018. The completion of any outstanding activities in relation to the audit recommendations is overseen by Chief Superintendent Governance, Audit and Assurance.</p>	<p>The authority has a commitment to ensure its arrangements remain robust in this area. ICO recommendations have been actioned and a substantial staff resources was allocated. The authority’s SIRO oversees the routine updating of policies, procedures and staff training and guards the authority’s commitment to compliance. Robust provisions already existed, but the ICO audit drove additional scrutiny and updating of these. The creation of a comprehensive IAR, as indicated under Element 4, will greatly</p>

				<p>Police Scotland also established a Data Protection Reform Project in November 2017. This included the recruitment of four full-time staff supported by existing resources, to co-ordinate and deliver actions required to ensure compliance with the General Data Protection Regulations (GDPR) and the Data Protection Act 2018.</p> <p>The actions followed the Information Commissioner’s Office (ICO) ‘12 Steps’ guidance, and recommendations from the aforementioned ICO audit. The project sponsor is ACC Alan Speirs, Professionalism and Assurance, who is also Police Scotland’s named individual under Element 1, Senior Information Risk Owner (SIRO) and Chairs the Information Governance Board.</p>	<p>advance the authority’s ambitions under this element.</p> <p>The assessment team is particularly pleased to learn about the authority’s further commitment to staff training.</p> <p>Update required on any future change.</p>
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					<p>As outlined in Element 4, the DP Reform project team carried out a Force wide information audit that populated the Force's Information Asset Register (IAR). Entries on the IAR identify where personal and sensitive personal data are held across the organisation.</p> <p>The project has also resulted in the development and implementation of mandatory Data Protection training that is available to all officers / staff via an e-learning environment. This training consists of three modules – an overview of the new legislation, information security principles and behaviours, and the appropriate use of consent. The completion rate at the time of writing is around 90%. A comprehensive annual refresher training package is also being developed.</p>	
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					Lastly, the Information Management department also updated the induction training that is now provided to all new staff and probationary officers when they start with Police Scotland.	
10. Business Continuity and Vital Records	G	A	G	<p>The RMP states that vital records will be identified in partnership with Information Asset Owners and incorporated into business continuity plans. Police Scotland has committed to updating the Keeper on progress towards this.</p> <p>The Keeper would like to receive updates concerning the testing of business continuity plans scheduled for March 2015.</p>	<p>The information audit undertaken by the Data Protection Reform Team (see Element 9) culminated in the creation of an information asset register which includes a 'vital' column which allowed responders to identify information assets as vital when submitting information audit self-assessment returns. This status is currently self-assessed and will require further validation by Records Management, however it offers indication of those assets that individual departments consider as vital.</p>	<p>The authority has advanced this element considerably since achieving the Keeper's agreement in 2014. The Keeper's request for updates on both the testing of BC plans and work to identify vital records can be satisfied by work undertaken in these areas in the intervening period.</p> <p>Vital records are now being identified, although RM staff remain to validate the work undertaken. Testing of BC plans has clearly been conducted and further routine testing is to be conducted this year.</p> <p>Evidence confirming the authority-wide application of these new arrangements, of testing already</p>

				<p>The Keeper agrees that Police Scotland has established processes to ensure that it has procedures in place to enable it to resume its key functions in the event of an interruption to its normal business. The Keeper accepts that there is a commitment to identifying vital records and looks forward to being updated as this work progresses.</p>	<p>The testing of business continuity plans went ahead in March 2015 at Police Scotland HQ at Tulliallan Castle. Exercises were conducted by the Police Scotland Risk and Business Assurance Dept in conjunction with SMARTEU (Scottish Multi-Agency Resilience Testing and Exercise Unit). The exercises took the form of Table Top Exercises (TTX) and featured a range of scenarios which included disruption caused by a variety of factors.</p> <p>A further exercise schedule was put in place for 2017/2018 on a rolling 2 year programme where all business areas attended a form of speed exercising. The Business Continuity Officers issued tailored evaluation reports for each of the business areas that attended, detailing a number of recommendations</p>	<p>undertaken and the commitment to the proposed routine testing regime, would suffice to attract a green rating for this element under any future formal resubmission of the plan.</p>
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					<p>for them to consider in their BC planning in the future.</p> <p>The next round of exercising will take place in January 2019 and will be similar to the 2015 exercise.</p>	
11. Audit trail	G	A	A	<p>The Keeper requests he is kept informed of the results of the planned review into hard-copy records storage and he will need to know what the authority's plans are for electronic records audit trail provision should the business case for a standardised approach be rejected.</p> <p>The Keeper agrees that there is some audit trail functionality in place in the authority's records</p>	<p>Electronic Records The implementation of the Data Protection Act 2018 brought with it 'Logging' requirements for law enforcement systems to contain specific audit information. This is the focus of a sub-group of the Information Governance Board to prioritise systems for remediation. Even though this is focused on law enforcement systems that contain personal information, it is being reviewed as a standard to follow for all systems.</p> <p>All new system implementations will require</p>	<p>The authority's arrangements for robust audit provision for both paper and electronic records was being developed when this element was agreed under improvement in 2014. Certain procedures and policies were in place, but there were significant legacy issues and little uniformity of practice. Gaps in provision were acknowledged and compliance was, inevitably, sporadic across the authority.</p> <p>The intervening period has brought change to this situation. Legacy issues are better understood, Data Protection law requires specific solutions to be implemented and the authority has been pro-active in its</p>

				<p>management systems. The Keeper welcomes Police Scotland's commitment to standardise this across the organisation. He can therefore agree this element on an 'improvement model' basis provided he is kept informed of further developments.</p>	<p>the submission of a DPIA and part of this will be to ensure that appropriate audit information is included as a requirement of system implementation.</p> <p>Paper Records With regard to paper records, Police Scotland currently maintain several internal records stores and several external off-site records storage suppliers. Work is currently being undertaken to review all off-site storage with the aim of simplifying the arrangements currently in place.</p> <p>One of the internally managed stores was created through the consolidation of three prior legacy record stores in the East Local Policing Area. Over a short period of time, several thousand boxes were relocated and a process</p>	<p>approach to improving records management across the Force.</p> <p>Work is ongoing to deliver appropriate audit solutions for previously implemented Police Scotland systems and Legacy Force systems still in existence. Police Scotland, in developing and implementing audit solutions, must to be confident these solutions, when implemented, will adequately satisfy the authority's Data Protection obligations. Due to the number of systems currently in use across the authority, and with ongoing pressure on available resources, this is necessarily time consuming work. Progress is being made, but it will understandably take time to conclude.</p> <p>The Keeper commends the authority for its commitment to improvement under the element and for adopting a sensible and methodical approach. He looks forward to receiving further updates on progress in due course.</p>
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					<p>developed for their ongoing management.</p> <p>The Interim Records Officer has also implemented and updated the audit trail and procedures for officers / staff to use the internal record stores for the Tayside area, which mirrors the procedures that were developed for the aforementioned consolidation work. All borrowed records are tracked and individuals are sent reminders for records borrowed. Physical access is controlled by Records Management.</p>	
12. Competency Framework for records management staff	G	G	G	Update required on any change. The RMP commits Police Scotland to informing the Keeper if there are any changes to job descriptions following the consultation in regard	There is no update to this element.	Update required on any future change.

				to organisational change.		
13. Assessment and Review	G	G	G	Update required on any change. The Keeper agrees that there is a strong commitment to self-assess and review the RMP on an annual basis and would be glad to receive updates on the planned self-assessment surveys.	As previously noted, Police Scotland has formed an Information Governance Board (IGB) chaired by ACC Alan Speirs that meets quarterly. This is the forum information governance matters are reported to and where future internal assessments of the RMP will be discussed. The IGB takes over in that regard from the Corporate Governance Board that was originally noted in Police Scotland's agreed RMP.	The assessment team thanks the authority for keeping it informed of changes to the governance arrangements under this element. Update required on any future change.
14. Shared Information	G	G	G	Update required on any change. The Keeper commends the development of a toolkit (completion date of December 2014) to assist	Information sharing has been updated to reflect recent legislative changes. An updated document set has been created including the	Again, the authority inherited a mixed bag of data sharing policies and procedures when Police Scotland was established under The Police and Fire Reform (Scotland) Act 2012. When the Keeper agreed the authority's plan in 2014 he was

				<p>Divisions in reviewing and revising their current procedures and welcomes updates on this development and subsequent training.</p>	<p>Information Sharing SOP, guidance, Risk Matrix and Information Sharing Agreement (ISA) template. This has been provided via Police Scotland's Intranet to all officers / staff. There is now a standard process to follow when setting up a new ISA that will determine if one is required, and if so, its priority. In addition, a review of all ISAs is ongoing to identify those that are no longer required.</p> <p>As noted prior, there is a standard ISA template that is only provided where the Information Assurance team agree there is a requirement for an ISA to be in place.</p> <p>Information sharing has also been included within the mandatory Data Protection eLearning package for all officers / staff. There is also additional training and</p>	<p>satisfied all data sharing protocols were being drawn up using a SOP and assessed against compliance with DPA 1998 and the Human Rights Act 1998. The authority has since critically reviewed its arrangements and has develop a new standard arrangement for this purpose. It is noted that the authority's mandatory training regime has also been strengthened to include additional guidance to staff.</p> <p>Evidence confirming the authority-wide application of these new arrangements would, along with a robust compliance statement, attract a green rating for this element under any future formal resubmission of the plan.</p>
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					guidance provided to Police Scotland's Concern Hub personnel in relation to wellbeing concerns.	
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Interim Report on the submitted Progress Update Review (PUR) for Police Scotland

This document is not the Final Report on your PUR submission.

This document has not been forwarded to the senior officer named in your agreed RMP.

This interim report gives us the opportunity to let you know what our current thinking on your submitted PUR template is. It also gives you the opportunity to correct any misunderstandings on our part and to query any statements that we may have made that misrepresent the actual position in your authority.

It may be that, in the general comments at the end, we have made suggestions how your PUR template might be strengthened, where further evidence might be submitted for example. Please consider these suggestions and let us know your views.

If, in light of our comments, you decide to add new evidence, submit updated versions of documents or make changes to the text of your PUR template, please highlight these changes to us, either by adding comments to this report and returning it to us, or by providing us with a separate list.

If we have not heard from you one month after receipt of the report we will assume you are content and will go ahead with our proposed Final Report.

Version

The progress update submission which has been assessed is the one received by the Assessment Team on **9 November 2018**. The author of the progress update submission is Joe Bartoletti, Records Manager.

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

7. PRSA Assessment Team's Summary

The Assessment Team has reviewed **Police Scotland'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

Police 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. It is clear that some of Police Scotland's records management arrangements remain in transition as policies and procedures inherited from the old regional police forces are reviewed and merged to create new, standard Police Scotland SOPs. This process will, for some elements, take time to conclude and see the new policies embedded. Nevertheless, excellent work has already been concluded under certain elements. It is the case, that with the appropriate evidence under a formal resubmission of the plan, that

Element 10: Business Continuity and Vital Records, could move from an amber to a green rating. It is clear from the statements provided that the issues raised by the Keeper in 2014 under this element, for which he requested updates, have been dealt with by the authority. Further, the element is benefitting from the authority's IAR development and implementation programme. With the appropriate evidence this would become green under the RAG system.

There appears to be no question that the authority is advancing across many other elements, enhancing and making stronger elements that achieved a green rating in 2014, e.g. Elements 3, 5 13 and 14, and closing in on green ratings for elements that were not green under the original agreement, e.g. 4, 7 and 11.

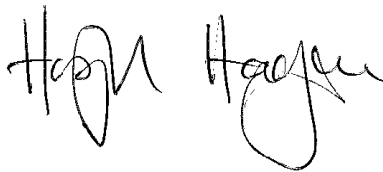
It appears very clear from the PUR compliance statements that the authority has already reviewed and merged a number of legacy policies and procedures to create stronger SOPs for the new authority, and is committed to concluding the exercise for all other SOPs. Work remains to be done, but this is a time consuming and resource intense exercise and the authority is to be commended for its commitment to this task. Evidence in support of this commitment is the increased resources being made available, both in support systems and in additional staff. A new governance structure appears to be in place, the authority's SIRO appears to be driving all ongoing records management initiatives, systems are being updated and renewed and there is a more robust training regime in place. It says a lot about an authority's commitment to improvement when it employs new, professional staff, at a time of austerity. Police Scotland has done just that with respect to records management and data protection staff and the assessment team applauds this level of commitment.

8. PRSA Assessment Team's Evaluation

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



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Hugh Hagan
Senior Public Records Officer