

The Public Records (Scotland) Act 2011

**The Keeper of the Records of Scotland
The Registrar General for Scotland**

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

05 July 2017

Contents

1. The Public Records (Scotland) Act 2011.....	3
2. Progress Update Review (PUR) Mechanism.....	4
3. Executive Summary.....	5
4. Authority Background.....	5
5. Assessment Process.....	5-6
6. Records Management Plan Elements Checklist and PUR Assessment.....	7-30
7. The Public Records (Scotland) Act Assessment Team's Summary.....	30-31
8. The Public Records (Scotland) Act Assessment Team's Evaluation.....	31-32

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 Final Report sets out the findings of the Public Records (Scotland) Act 2011 (the Act) Assessment Team's consideration of the Progress Update template submitted for **The Keeper of the Records of Scotland** and **The Registrar General for Scotland**. The outcome of the assessment and relevant feedback can be found under sections 6 – 8.

4. Authority Background

Keeper of the Records of Scotland and Registrar General for Scotland

National Records of Scotland (NRS) was established on 1 April 2011, following the merger of General Register Office for Scotland (GROS) and the National Archives of Scotland (NAS), two non-ministerial agencies of the Scottish Government. For the purposes of the Public Records (Scotland) Act 2011(PRSA), NRS is not scheduled as an organisation. However, the legal entities of the Registrar General for Scotland (RG) and Keeper of the Records of Scotland (Keeper) are both scheduled. Both posts, which appear separately on the schedule, are currently held by Tim Ellis who is also the Chief Executive Officer of NRS. The Keeper's Public Records (Scotland) Act 2011 assessment team considers that this joint submission is appropriate.

NRS undertakes a range of functions: among other things, it undertakes the Census, collates and publishes demographic statistics, is responsible for the registration of births, deaths and marriages, and is the national archive repository for 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 Keeper on this basis.
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				request that they are updated as work on this element progresses.			
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6. Records Management Plan Elements: Checklist

Keeper of the Records of Scotland and Registrar General for Scotland

Element	Status of elements under agreed Plan, July 2013	Status of evidence under agreed Plan, July 2013	Progress assessment status, July 2017	Keeper's Report Comments on Authority's Plan, July 2013	Self-assessment Update as submitted by the Authority since July 2013	Progress Assessment Review Comment – July 2017
1. Senior Officer	G	G	G	Update Required on Any Change	Change in personnel. Senior responsible officer is Gerry Donnelly, Head of Data Resources	There is clear evidence that a Senior Responsible Officer has been allocated.

2. Records Manager	G	G	G	Update Required on Any Change	No Change	There is clear evidence the Records Manager in place continues to have the full support of NRS senior management.
3. Policy	G	G	G	Update Required on Any Change	Record Management Policy reviewed and updated.	<p>The Assessment Team commends the continued review and updating of NRS Records Management Policy.</p> <p>The revised and updated policy statement, dated July 2016, continues to clearly set out the authority's commitment to creating and managing authentic, reliable and useable records, capable of supporting business functions and activities for as long as they are required.</p> <p>The assessment team recognises the on-going initiative being undertaken by the authority under this element.</p>
4. Business Classification	A	A	A	As soon as the Business Classification Scheme begins to be rolled out throughout the organisation	Since the RMP was agreed NRS has decided to primarily manage its corporate information within the Scottish	Scottish Government Business Classification has been submitted as evidence, showing the record-creating functions of

			<p>(after an electronic records solution is in place) it should be reviewed to test its appropriateness and the result of that review communicated to the Assessment Team.</p>	<p>Government's electronic document and records management (eRDM) system, Objective eRDM. This system is configured to the Scottish Government's business classification scheme, which has been adapted from the Integrated Sector Vocabulary Scheme (IPSV). The Scottish Government are pursuing a project to evaluate options for replacing the current eRDM system and as part of this project will consider rationalising the present business classification scheme. As a user of eRDM NRS will have the opportunity to contribute to this. If changes are made to the business classification scheme the RMP will be updated to reflect this. The suitability of the Scottish Government's business classification scheme for NRS will be assessed and validated during the implementation of eRDM. The management of NRS records within this business classification scheme,</p>	<p>the authority.</p> <p>The Assessment Team considers that NRS has made a strong commitment to managing its corporate information within the Scottish Government's electronic document and records management (eRDM) system, Objective eRDM.</p> <p>The Assessment Team commends plans to monitor and keep under review the suitability of the Scottish Government's business classification scheme for the management of NRS records.</p> <p>The Assessment Team commends the authority for this initiative.</p> <p>The team requests that the Keeper is kept updated on any changes made to the business classification scheme as a result of any reviews.</p> <p>The Assessment Team</p>
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					<p>in both eRDM and its replacement, will be subject to on-going monitoring and annual review to ensure that all of the functions, activities and transactions carried out by NRS continue to be represented.</p>	<p>considers that progress is being made and that this element should remain under improvement.</p>
5. Retention Schedule	A	A	A	<p>Update required on any change</p>	<p>The NRS Retention and Disposal Schedule acts as a reference point for all staff when assessing how long they need to retain business information and will be actively used to review records held in legacy information systems.</p> <p>In eRDM the retention periods identified in the Scottish Government's Retention Schedule are applied to files created within the system. The retention periods have been mapped to file types which are then used against the files used in eRDM. These standard retention rules are used by all of the Scottish Government and its non-ministerial departments and agencies. Where the retention</p>	<p>The Assessment Team are pleased to see that retention schedules used within NRS will be subject to on-going monitoring and annual review to ensure they continue to identify all record types created in NRS and their appropriate retention periods.</p> <p>The Assessment Team requests that the Keeper is kept updated on any progress made in the review and disposal of information held in legacy storage and systems.</p> <p>As retention rules are not being actively applied to shared drives and some line of businesses, complete evidence of the rules operational efficiency has not</p>

				<p>rules of existing file types are not appropriate for all of the records generated by its transactions and activities, then NRS will request the creation of additional file types.</p> <p>At present retention rules are not being actively applied to shared drives and some line of business systems, but the next phase of the EDRMS Project will address how information held in legacy storage and systems is reviewed and disposed of in line with the NRS Retention and Disposal Schedule.</p> <p>Emails stored on the Exchange Server are subject to the retention periods defined in the Scottish Government's Email Archiving Policy. Information held on personal storage areas on network drives are subject to the retention periods defined in the Scottish Government's Archiving Policy for Shared Drives.</p>	<p>been provided.</p> <p>The Assessment Team considers that progress is being made and that this element should remain under improvement.</p>
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6. Destruction Arrangements	G	G	G	<p>Further disposal/security initiatives are under discussion. The PRSA Assessment Team should be kept informed and made aware of the latest position regarding these.</p>	<p>The Records Disposal Policy describes procedures for the disposal of information in NRS. All official paper waste is disposed of by confidential shredding. Secure consoles have been introduced to house all confidential paper waste until it is collected by a third party contractor. Electronic data selected for destruction is purged from disk backups after 12 weeks. Guidance on the correct procedures for the disposal of waste in all formats has been issued to staff and is available on the intranet.</p>	<p>The introductions of secure consoles to house confidential waste paper until it is collected and the regular purge of electronic data selected for destruction shows that the action points laid out in the initial submission are being addressed.</p> <p>The Team is pleased to see that guidance on the correct procedures for the disposal of waste is available to all staff.</p> <p>The evidence provided by NRS supports the progress made in this area. The Assessment Team requests that the Keeper is made aware of any further disposal and security initiatives introduced.</p> <p>The assessment team recognises the on-going initiative being undertaken by the authority under this element.</p>
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7. Archiving and Transfer	G	G	G	A new Archive Transfer Pack is currently being developed as part of a wider accreditation programme. If this is successfully concluded, this might reflect good evidence of archiving. The PRSA Assessment Team request updates when available.	An Archive Transfer Pack has not been developed by NRS Government Records Branch which has focused its resources on other priorities. NRS complies with the requirements for the review and transfer of records to public archives in the Section 61 Code of Practice: Records Management. Business areas within NRS transfer records of enduring value to the NRS archive. Government Records Branch has custodial responsibility for these archives under the management responsibility of the Deputy Keeper of the Records of Scotland. The NRS Archiving Arrangements Policy describes the agreed process for transferring records, in all formats, from operational records management systems to the NRS archive. The policy describes the roles of the	<p>The evidence provided demonstrates that suitable policies and procedures are in place to show that NRS continues to properly consider Archiving and Transfer procedures.</p> <p>The Assessment Team would like to be kept informed of the development of the new Archive Transfer Pack if progress is made in this area. The Team would also like to be kept updated on any changes to the 'Item 021: Guidance for Depositors on the Transfer of Born Digital Records', provided as evidence and currently marked as 'Draft'.</p> <p>The assessment team recognises the on-going initiative being undertaken by the authority under this element.</p>

					records manager, information owners and Government Records Branch in this process, and the actions and activities that NRS staff must carry out to prepare records selected for transfer. When preparing born-digital records for transfer staff will follow the NRS Guidance for Depositors on the Transfer of Born Digital Records.	
8. Information Security	G	G	G	The Keeper/RG should forward any updated security arrangements to the PRSA Assessment Team	<p>NRS continues to maintain a number of well-established information security policies and procedures in place which all staff are required to comply with. Updated policies are provided. NRS complies with the security and access requirements of the Section 61 Code of Practice: Records Management.</p> <p>Iron Mountain utilises electronic, physical and operational access controls at their facilities. They operate an Information Security Management System which</p>	<p>There is considerable evidence that suitable policies and procedures are in place, showing that NRS continues to take information security seriously.</p> <p>The Assessment Team commends the continued review and updating of NRS Information Security policies. The Team requests that it is informed of any further updates to NRS security arrangements.</p> <p>The assessment team recognises the on-going initiative being undertaken by the authority under this element.</p>

					complies with the requirements of ISO 27001.	
9. Data Protection and	G	G	G	Update Required on Any Change	<p>The NRS Data Protection Policy and codes of practice have been reviewed and updated. All staff undertake annual mandatory data protection training. A Privacy Group has been established which is responsible for considering privacy issues across programmes and projects, and for reviewing privacy impact assessments.</p>	<p>The Assessment Team commends the continued review and updating of NRS Data Protection Policy and codes of practice policies. The evidence provided demonstrates that NRS has suitable policies and procedures in place to show that Data Protection is properly considered by the authority.</p> <p>The introduction of annual mandatory data protection training for all staff shows that the action points laid out in the initial submission are being addressed. The Team are also pleased to discover that a Privacy Group has been established.</p> <p>The Assessment Team would like to be kept updated on steps taken towards ensuring that the level of data protection NRS operates is compliant with the EU General Data Protection</p>

						Regulation and related UK data protection legislation. The assessment team recognises the on-going initiative being undertaken by the authority under this element.
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Assessment Report

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	A	A	G	The Senior Responsible Officer acknowledges weakness in this area and indicates resources will be made available to create an authority-wide business continuity management system. A disaster plan based on that of the old National Archives of Scotland has been included in the evidence pack (hard copy only). It is acknowledged by the Keeper/RG that this does not apply to the whole authority. A new plan is under development. Updates required on any change	This element was agreed in June 2013 on improvement terms. NRS now has business continuity arrangements in place to ensure that key systems and services can be recovered as soon as possible in the event of an incident. NRS has developed a series of related business continuity plans for sites and services which are integrated together within a Business Continuity Management System (BCMS). The business continuity plans were developed following a comprehensive business impact analysis (BIA) of all of NRS' functions and activities, which identified the resources needed to resume business operations within acceptable recovery timeframes. BIAs for each site document the vital records needed to restore business functions and their relative resilience or vulnerability. Electronic data is backed up to disk on a 12 week rolling cycle. One full backup is taken across the weekend and 4	The Assessment Team are pleased to see that significant progress has been made in this area since the Keeper's Assessment Report, which noted that this was an area of weakness within the authority's plan. Clear evidence provided by NRS supports statements of progress made under this element The Team commends the development and implementation of business continuity arrangements and plans, and the documentation of vital records needed to restore business functions and their relative resilience or vulnerability. The Assessment Team are pleased to see that the NRS has archives disaster planning procedures in place and that they are kept under review and regularly updated. The assessment team
10. Business Continuity and Vital Records						

				<p>incremental backups are taken during the week.</p> <p>NRS has archives disaster planning procedures in place which are reviewed and updated at least annually, as well as a contract with a specialist disaster response company and informal arrangements with national bodies in the event of an emergency. The archives disaster recovery plan has also been incorporated into the BCMS.</p> <p>Iron Mountain have business continuity plans for all their storage facilities. Location managers are responsible for ensuring that all issues of business continuity management are considered for their locations. Iron Mountain carry out at least four test exercises a year at sites within the UK and Europe.</p> <p>Change in personnel. Business Continuity leader is Gerry</p>	<p>recognises the significant progress made in this area and the on-going initiative being undertaken by the authority under this element.</p>
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				Donnelly, Head of Data Resources	
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11. Audit Trail	A	G	A	<p>Resources will be made available to create a new system for managing electronic records.</p> <p>Training on these procedures is to be rolled out in 2013. The Records Manager Person Specification includes a duty of training which acts as evidence that this is intended. There is a clear understanding for the need to improve this element in the case of electronic records on unstructured drives.</p> <p>Update required on any change.</p>	<p>The Scottish Government's eRDM system controls how users can create, edit, read, delete and apply restrictions to documents. It provides a full, unalterable audit trail of all actions taken upon documents, metadata or aggregations within the system.</p> <p>An audit trail is maintained for the registered paper files which are managed by the Records Management Unit and the access controls in operation within the statistical areas generate an access log for restricted data. The SharePoint electronic document management system includes functionality which protects documents from changes, but a full audit trail is not available. Presently many documents stored on shared drives can be moved, edited, renamed and deleted without actions being auditable. The EDRMS Project will seek to address these issues.</p>	<p>The Assessment Team are pleased to see that progress is being made under this element. The evidence supplied supports statement of progress in this area.</p> <p>The Assessment Team commends the provision of training for staff on the use of eRDM, document naming and records management good practice. The Team are also pleased to see that new guidelines have been introduced on document naming, use of version control, and the management of email in order to improve records management practices in all environments.</p> <p>The Assessment Team would like to be kept updated on the progress of the EDRMS Project, which should address the issue of documents stored on shared drives being moved, edited, renamed and deleted without such actions being auditable.</p>
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				<p>NRS also creates and manages considerable quantities of structured and semi-structured electronic data including: SAS (Statistical Analysis System) data sets; audio and visual media assets; GIS (Geo Spatial Information) maps and data sets; linked spreadsheets; and databases. All of this information is managed in compliance with relevant legislative and regulatory frameworks. Any corporate records generated from this data will be managed with reference to the NRS Retention and Disposal Schedule, with adequate audit trail information accurately captured.</p> <p>NRS has also been working to improve how records are management in all environments by introducing new guidelines on document naming, use of version control, and the management of email.</p>	<p>The Assessment Team considers that progress is being made and that this element should remain under improvement.</p>
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				<p>Training on the use of eRDM, on document naming, and records management good practice is being provided to staff. Further information is provided under element 12.</p> <p>NRS has semi-active records stored off site at Iron Mountain (IM). IM works to operating standards and procedures that are accredited to the quality assurance standard ISO9001:2008. IM use their proprietary SafeKeeperPLUS system to manage all aspects of business records management. The system automates rigorous inventory control processes, manages records databases with sophisticated indexing, processes all customer requests for filing and retrievals, and handles all billing and service information.</p> <p>NRS uses the Iron Mountain Connect web-based portal to control how its records are stored, handled and retrieved.</p>	
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					IM Connect provides designated users with the facility to retrieve records and return them to store and to generate activity and inventory reports which are used to monitor the storage and movement of records.	
12. Competency Framework	A	A	G	<p>The Senior Responsible Officer acknowledges weakness in the area of staff records management training and indicates resources will be made available to improve this.</p> <p>Update required on any change</p>	<p>Records management is identified as a distinct stream within the organisation's training portfolio and Corporate Development ensure that staff with specific records management responsibilities receive the training they require. Guidance is provided to all staff on induction and is available on the intranet. All staff receive training on how to use the Scottish Government's eRDM system. Additional training is provided to those staff who take on the Information Management Support Officer (IMSO) role and act as localised points of contact for records management and as gatekeepers of eRDM. Training presentations on records management have been developed which explain why</p>	<p>The evidence supplied demonstrates the authority's commitment towards continuous improvement. Confirmation that resources have been made available to improve staff records management training indicates that an area of weakness highlighted in the Keeper's initial assessment is being addressed.</p> <p>The Assessment Team are pleased to see that the NRS has made significant progress in the development and implementation of records management training and commend the authority's efforts to ensure that staff with specific records management needs receive the training they require.</p>

					records management is important and the arrangements for records management operated in NRS. Training is also delivered to meet particular staff needs identified by team leads in business areas.	
13. Assessment and Review	G	G	G	The Keeper recommends that the NRS record manager submits the results of any self assessment and must be informed if such assessment results in changes to the RMP	An Information Board was established in July 2016. The board will be responsible for reviewing and assessing the RMP, and the records management policies and practices within it, and will oversee the delivery of the records management programme. The Information Board reports to the NRS Management Board. Further self-assessment has not been carried out since the RMP was agreed. NRS is currently in the middle of delivering an improvement programme through its EDRMS Project. Once the implementation of eRDM has been completed consideration	The Assessment Team commends the establishment of an Information Board. The Team suggests that the Keeper is provided with evidence of the establishment of the Information Board when possible. The Assessment Team requests that the results of any self-assessments following the completion of the implementation of eRDM are submitted to the Keeper and he is informed of any changes made to the RMP as a result. The assessment team recognises the on-going initiative being undertaken by the authority under this element.

					will be given to carrying out a self-assessment.	
14. Shared Information	G	A	G	New information sharing protocols are currently being developed. These should be shared with the Assessment Team as they are developed.	<p>Responsible officers have been updated.</p> <p>NRS exercises great care when sharing information. It follows the published guidance from HMG Cabinet Office and the principles of the International Security Standard ISO 27001, and adheres to the Information Commissioner's Data Sharing Code of Practice and the Guiding Principles for Data Linkage. NRS uses data sharing and processing agreements to ensure that information is shared fairly and lawfully. Data sharing guidelines have been produced for staff. A central register of all data sharing and processing agreements is maintained. When undertaking any new data sharing activities which involve personal information a privacy impact assessment will be undertaken to ensure that any privacy risks are identified and mitigated.</p>	<p>The evidence supplied shows that NRS recognises the need for the establishment, maintenance, and strict adherence to procedures which ensure the efficient and secure sharing of information.</p> <p>The NRS regularly engage in the sharing of information and data, both during systematic routine sharing and during exceptional one-off requests. As such this authority has rightly developed protocols and guidance concerning the nature of the information being shared and the arrangements put in place to manage such sharing.</p> <p>As seen in documents like the <i>Access Control Policy</i> (Evidence 046) there is an especially strong emphasis on information security, privacy considerations, and access restrictions. This is to be welcomed.</p>

				<p>Access control policies define access rights and security controls for personnel that need to use systems and access data within the organisation to perform their job function. Records are kept of the movement or copy of protectively marked information assets. A secure extranet has been set up to enable NRS to share corporate information with external partners and stakeholders.</p> <p>All staff receive information security and governance training on induction and undertake mandatory data protection training annually. Information Asset Owners receive instruction on their role and responsibilities. Staff involved in data linkage activities are properly trained on data security policies and procedures, and undertake periodic refresher training.</p>	<p>The Statement of Compliance and submitted <i>Statement on Information Sharing</i> (Evidence 052) shows that the NRS understand the implications of data sharing and have developed procedures and templates including data sharing agreements and a central register of these agreements to ensure staff comply with authorised guidelines. These guidelines are based upon the advice issued by HMG Cabinet Office and comply with current legislation including the International Security Standard ISO 27001. NRS should be commended for the development of their policies in line with current legal expectations and best practice.</p> <p>All staff receive information security and governance training during induction and there are refresher courses for those involved in data linkage activities.</p>
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				<p>Our Guide to Information describes information we routinely publish, while our Open Data Publishing Plan describes data that can be used and shared by anyone, for any purpose, without restriction and for free.</p>	<p>The submitted <i>Data Sharing Guidelines</i> (Evidence 054) shows that staff have access to guidance detailing how to undertake data sharing activities such as carrying out a Privacy Impact Assessment (PIA), completing a Data Sharing Agreement, and thereafter logging such agreements in the Data Sharing and Processing Agreements Register.</p> <p>To demonstrate how these processes work in practice NRS have submitted as evidence the <i>Data Sharing and Processing Agreements Register</i> (Evidence 055) and the <i>Data Sharing Agreement Template</i> (Evidence 053). These help identify the purpose of data sharing, note the limitations on the use of that data, outline the surrounding access restrictions, and detail the importance of information security (both physical and technical and encompassing when data is in transit and once</p>
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					<p>shared with the third party). The Assessment Team commends this authority's recognition of the key elements required within any data sharing agreement.</p> <p>Although the submitted <i>Data Sharing Agreement Template</i> is currently a draft (the Assessment Team will require sight of the authorised version in future assessments), evidence of its practical use has been provided by an <i>Example of a Data Sharing Agreement between the Registrar General and the Scottish Government Education Analytical Services</i> (Evidence 056).</p> <p>The Assessment Team welcomes this authority's commitment to reviewing all relevant policies, particularly in the light of upcoming legislation such as GDPR.</p> <p>The Assessment Team are pleased to see that the NRS has made significant progress in the</p>
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					development and implementation of protocols and guidelines surrounding information and data sharing and commends the on-going initiative being undertaken by the authority under this element.
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Version

The progress update submission which has been assessed is the one received by the Assessment Team on 08 March 2017. The author of the progress update submission is John Simmons, Head of Records Management.

The progress update submission makes it clear that it is a submission for **The Keeper of the Records of Scotland** and **The Registrar General for Scotland**.

7. PRSA Assessment Team's Summary

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

General Comments

The Assessment Team acknowledges the change of personnel identified in Element 1.

The Assessment Team commends the review and updating of the NRS Records Management Plan and welcomes the decision to manage corporate information within the Scottish Government's eRDM system, Objective. The Team believes this illustrates a strong commitment to good records management.

The authority's willingness to monitor and review existing procedures and new initiatives, notably the use of the Scottish Government's Business Classification Scheme and the NRS Information Security policies, is an admirable and sensible approach to records management.

The Team applauds the introduction of training for staff in the handling of personal data and welcomes the guidance on records management policies like the disposal of records being made available to staff.

The Team is particularly pleased to see that sufficient progress has been made in areas previously considered to be weaknesses (Elements 10, 12, and 14) to warrant being awarded a Green status by the Assessment Team.

For elements which continue to be assigned an Amber status, denoting their 'Improvement Model' basis (Elements 4, 5, and 11), the Assessment Team would like to receive further updates and/or evidence as part of any future Progress Update reports. The Team wishes to state that it recognises that progress is being made in these elements.

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

8. PRSA Assessment Team's Evaluation

Based on the progress update assessment the Assessment Team considers that **The Keeper of the Records of Scotland** and **The Registrar General for 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.

Assessment Report

This report follows the Public Records (Scotland) Act Assessment Team's review carried out by,



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Neil Adams
Public Records Officer