



Public Records (Scotland) Act 2011
**Report by the Keeper of the
Records of Scotland, 2020**



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SECTION 1

Foreword by the Keeper of the Records of Scotland

I am pleased to present this report under the Public Records (Scotland) Act 2011 (the Act). This report sets out what was achieved during the year ending 31 March 2020.

The Act requires public authorities to submit Records Management Plans (RMPs) for my agreement and once agreed, these must be implemented and regularly reviewed. Since the Act came into force, some six years ago, we have agreed 237 Plans and sent invitations to 265 authorities. I am pleased to report that once again, I did not find it necessary to use the provisions afforded under section 4 of the Act, to return an authority's Plan. This is a positive sign, which indicates to me that authorities are taking their responsibilities to comply with the Act seriously.

The legislation has, over time, become increasingly embedded into Scottish public authorities and has brought about improvement and a stronger culture of good record keeping practice across the Scottish public sector.

This year I started to formally revisit a number of previously agreed Records Management Plans. The Act gives me the authority to do this five or more years after agreement was achieved. Authorities were invited to review their Plans and submit them for my assessment and agreement. The first formal full resubmissions have now been received, and I will be interested to see how these Plans have progressed and developed since their original implementation.

In addition, I am encouraged to report increased engagement with the Progress Update Review (PUR) mechanism, which is now in its second full year of operation. The PUR provides authorities a non-statutory improvement mechanism to benchmark their records management and information governance processes over time, to obtain external validation of their continued improvement efforts, to identify areas for development, and to facilitate regular informal contact between their organisation and NRS.

This year, seventy authorities have voluntarily reported on their progress since their Plans have been agreed. This is an increase on last year and represents the participation of over one third of all the invited authorities. The increased engagement in this scheme is a welcome indication that our colleagues, across Scotland, continue to improve and develop their records management and information governance arrangements.

We continue to grow, develop and diversify our outreach programme. This year we increased the number of our engagement events, hosting seven of our popular surgeries across Scotland. Over recent years, the shape and nature of our surgeries has been modified to reflect changing needs and the challenges experienced by our stakeholders. I am encouraged to report that this year we welcomed a growing number of participants to these events. Alongside these surgeries, the assessment team also continued their programme of one-to-one engagement with authorities.

The success of the implementation of the Act lies in the strength of engagement and collaboration between my staff and colleagues from across the Scottish public sector. These events underpin that collaborative relationship, ensure my assessment team remains visible, approachable and responsive to our stakeholder needs, and remain an indispensable aspect of our engagement strategy.

In addition to these events, this year we hosted our third PRSA Conference, "Continuing Improvement and Digital Advance". The conference reflected how far we have already come and the great work going on across the Scottish public sector to embrace and embed the spirit and purpose of the Act. It also explored how we can continue to build on these foundations, develop better, more effective and efficient records management, support the delivery of quality public services and meet the challenges of the digital age.

This theme of continuous improvement applies also to the work of my own PRSA assessment team. At the conference, I was very pleased to launch the newly revised Keeper's Model Records Management Plan, which the team had co-produced last year with stakeholders.

The original Model Plan, developed in 2010 with stakeholders, was fundamental to the successful implementation of the Act. It was appropriate that, with the passage of time, we revisited this Plan to ensure it remained fit-for-purpose. It was also vital that, once again, we drew on the experience and expertise of our stakeholder community, to ensure the revised Model Plan remained responsive and informed by the needs of stakeholders.

The most significant change to the Model Plan is the inclusion of an additional element. The new 'Element 15' "Public records created by third parties," emphasises the importance of public authorities ensuring the proper management of public records created on their behalf by a third party. This change recognises the important role that private and third sector organisations have in the provision of public functions. I am confident the revised Model Plan will deliver greater assurance in this area of public records creation and management.

At the end of this reporting year we faced the implications of the global COVID-19 pandemic. It is at these times that strong and reliable records management practice is ever more important.

COVID-19 has necessitated changes to working arrangements for all of us. In many cases it has affected how authorities deliver services and how records are created, particularly as the use of technology has been accelerated to support collaboration and decision making. It will be important for organisations to continue to understand how these changes relate to good records management practice.

These are challenges which my own organisation has also faced. In this context the pandemic has required the cancellation of some planned face to face events. However our core work, to support and advise authorities, promote continuous improvement and undertake assessment activity, continues. The improvement in records management practice which has taken place over the last six years will continue to be an imperative to good governance and democracy, as we face the challenges ahead.

Paul Lowe



Keeper of the Records of Scotland

December 2020

02

SECTION 2

Review of the year

237 plans agreed

265 invitations issued

since Jan 2013

15 plans agreed

9 invitations issued

this year

3

authorities who re-submitted plans under Section 5(6) of the Act and had them agreed this year

Progress Update Review (PUR) process continues to be rolled out

197

authorities invited to take part this year

70 authorities receive final report from the Keeper's assessment team

4.47%

increase on previous year

30

invitations to submit issued to Integration Joint Boards

4 Integration Joint Boards have submitted their plans

Face to face meetings held with

17

authorities to discuss records management plans this year

5 general surgeries held for scheduled authorities

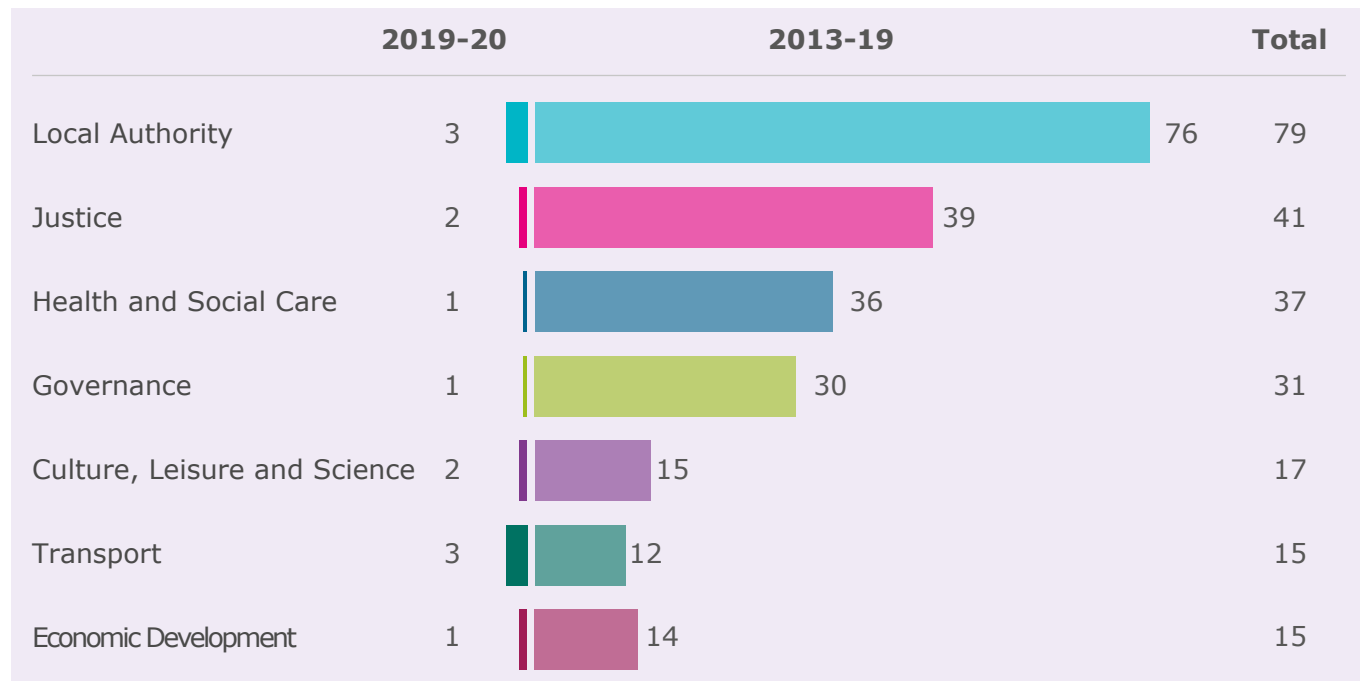
2 SharePoint surgeries held for scheduled authorities

105 delegates attended

Building on Public Records Scotland Act Success: Continuous Improvement and Digital Advance, PRSA Conference.

Records management plans agreed by sector

A total of 15 plans were agreed in 2019-2020 out of 237 plans agreed since 2013



Presentations on Act delivered at meetings and events, 2019-2020

Organisation	Location	Date
PRSA Newcomers Surgery	Edinburgh	02-Apr-19
Information and Records Management Society Annual Conference	Cardiff	21-May-19
PRSA Conference	Glasgow	31-May-19
Children's Hospices Across Scotland	Edinburgh	03-Jul-19
UCL Memory, Identity, Rights in Records, Access Conference	London	18-Jul-19
OSIC FOI network Forum held in the office of Audit Scotland	Edinburgh	23-Aug-19
NHS NSS Information Governance Forum	Edinburgh	26-Aug-19
Dundee University Centre for Archival Studies	Dundee	04-Sep-19
PRSA Surgery	Aberdeen	02-Oct-19
PRSA Surgery	Edinburgh	24-Oct-19
SharePoint Surgery	Glasgow	29-Oct-19
PRSA Integration Joint Boards Surgery	Edinburgh	31-Oct-19
PRSA Surgery	Edinburgh	19-Nov-19
British Records Association Archives in Post Truth Society Roundtable	London	26-Nov-19
University of Glasgow Information Management Course	Glasgow	31-Jan-20
Scottish Government New Public Bodies Network	Glasgow	10-Feb-20
PRSA Local Authority Resubmission Workshop	Edinburgh	10-Mar-20

SECTION 3

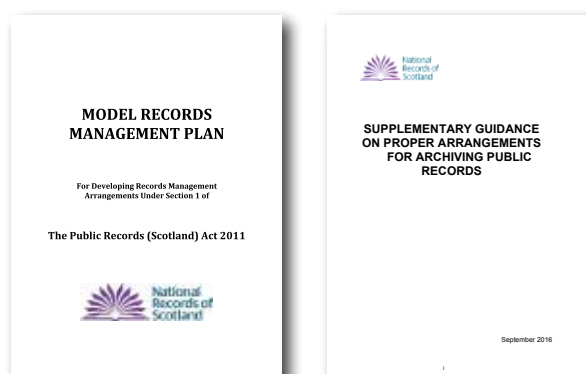
Aims, obligations and assessment



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 November 2007. That report can be found on the Scottish Government's website.²

The Public Records (Scotland) Act 2011 (the Act) has been in place since January 2013.¹ The aim of the Act is to improve record keeping across the Scottish public sector. It requires named authorities to prepare, implement, and keep under review, a records management plan setting out proper arrangements for the management of their public records. The plan must be submitted to the Keeper of the Records of Scotland (the Keeper) for assessment and agreement.

The Act requires the Keeper to publish guidance on the form and content of records management plans. In 2012 the Keeper co-developed and published a Model Records Management Plan (Model Plan), and Guidance Document, to help authorities develop their own plans. Following collaboration with stakeholders and a formal Scottish Government consultation in 2018, a new Model Plan was published in May 2019 (See Section 4). The Keeper's Guidance Document that accompanies the Model Plan is currently being updated and will be finalised in collaboration with stakeholders. It will be published alongside his Model Plan and Proper Arrangements Guidance on the National Records of Scotland's (NRS') website.³



Under the Act the Keeper is obliged to prepare an annual report for Scottish Ministers, informing them of progress and reporting on any shortcomings identified under the assessment process.

The Act provides the Keeper with authority under Section 4 to return a plan where he considers it does not meet his proper arrangements requirements. Such action was not required during this reporting period.

1 <http://www.legislation.gov.uk/asp/2011/12/part/1/enacted>

2 <http://www.scotland.gov.uk/Publications/2007/11/20104729/0>

3 <http://www.nrscotland.gov.uk/record-keeping/public-records-scotland-act-2011/resources>



PRSA surgery, Edinburgh

Since the Act came into force the Keeper has agreed 237 plans and issued 265 invitations.

Plans agreed

A total of 15 plans were agreed this year and 9 authorities were invited to submit plans. Since the Act came into force the Keeper has agreed 237 plans and issued 265 invitations.

Updating the Act

Named authorities that must comply with the Act are listed under a schedule. Most new bodies are added to the schedule under their own founding legislation, but not all. Work is progressing to identify those new bodies that will be included under a Scottish Statutory Instrument to be concluded in 2021.

Improvement and Progress

The Keeper's focus remains firmly on improvement over time. He continues to regard an authority's acknowledgement of gaps in its records management provision, and planned improvement measures, as good records management practice.

The Keeper cannot revisit a plan under the legislation until five years has passed since it was last agreed, and so ongoing constructive engagement with authorities is crucial. The Progress Update Review (PUR) mechanism is a non-statutory improvement process which has been introduced to facilitate meaningful

PUR provides the Keeper with vital information on progress and the impact of the Act and it helps stakeholders identify changes and improvements in their record keeping arrangements whilst maintaining records management visibility with their senior management.

engagement, and continues to be valued by the Keeper and stakeholders alike. It provides the Keeper with vital information on progress and the impact of the Act, and it helps stakeholders identify changes and improvements in their record keeping arrangements, whilst maintaining records management visibility within authorities.

Last year, we announced our intention to invoke the provisions included under Section 5 of the Act that allow the Keeper to invite authorities to review their plans:

Section 5 Review of plans

- (1) An authority must—
 - (a) keep its records management plan under review, and
 - (b) if the Keeper so requires (whether at the time of agreement of the plan or otherwise), carry out a review of the plan by such date (the “review date”) as the Keeper may determine in accordance with subsections (2) to (4).
- (2) The Keeper must not determine a review date under subsection (1)(b) which is earlier than five years after the date on which the authority’s records management plan was last agreed.

Between January and March 2020, the Keeper issued invitations to five public authorities, the Keeper of the Records of Scotland, Registrar General for Births Deaths and Marriages in Scotland, Scottish Legal Aid Board, Falkirk Council and Falkirk Licencing Board.

We recognise that things will have changed for most authorities since their original submissions were agreed. We invited six authorities to a half day event to explore some of the areas of change, discuss any challenges or concerns they identified, and learn how we might best support authorities through the Keeper’s assessment process.

The Keeper’s assessment team liaises with named authorities over the development, submission and assessment of their proposed plans. The team can be contacted at public_records@nrscotland.gov.uk



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The PRSA Assessment Team: (L-R back row) Hugh Hagan and Pete Wadley; (L-R front row) Andrea Wells and Gill Mapstone (Head of Records and Archives Engagement).

SECTION 4

Engagement



The Keeper's commitment to provide practical support to authorities remains core to his implementation programme, and it continues to drive progress under the Act. This approach is supported by public authorities and is central in helping them develop robust records management plans. It further supports their ambitions to meet and remain in compliance with other information legislation.

General surgeries



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PRSA Surgery, Aberdeen

Our surgeries bring together colleagues from across the public sector to network and share experiences. They also ensure visibility of the assessment team, and provide opportunities to share good practice and provide advice. From these events we learn about colleagues' successes and achievements, but also their challenges, which allows us to target future engagement and ensure this remains current and meaningful. This year, for example, we ran four general surgeries. One of these was for newcomers to help meet the needs of colleagues who only recently joined their authorities, and who were keen to learn about the Act. We also ran a surgery focused on supporting colleagues working in Integrated Joint Boards, and we organised two surgeries to bring together colleagues on the topic of Microsoft Office 365/SharePoint implementation.

▶ Alan Redhead, Records manager,
David MacBrayne Ltd

Colleagues expressed a wish to continue the conversation beyond these sessions and for there to be a focus on outcomes, including co-produced guidance on practical implementation, and best practice for public sector M365/SharePoint configuration.

The Public Records (Scotland) Act 2011 and in particular the requirement for a Records Management Plan gave us the framework for effective records management within the Company. It also provided the focus on what was required and how important records management was. The Company has made significant progress thanks to the Act, but special mention must be made about the staff at the NRS. Without the help and guidance we received from them, we may not be as close to completing the RMP as we are. It was always a pleasure dealing with them."

Our surgery activity allowed us to engage directly with records and information managers, representing 137 public authorities, on a broad range of topics. Demand for surgeries remains high and we will continue to meet this demand. We will also continue to review the format and content of all PRSA surgeries, to ensure they continue to meet the evolving needs of stakeholders.

Special Surgeries

Microsoft Office 365/SharePoint

We became aware this year that several public authorities were either contemplating, or had procured, Microsoft Office 365 (M365)/SharePoint, to support their approach to records management. The use of new technology can be helpful, but there are many issues to consider when implementing new technology solutions. Therefore, in October, we convened two special surgeries to support discussion of the broader records management practices, and implications of such transformational changes.

This extremely popular event, facilitated by Heather Jack and Frank Rankin, was attended by 41 stakeholders. Colleagues expressed a wish to continue the conversation beyond these sessions and for there to be a focus on outcomes, including co-produced guidance on practical implementation, and best practice for public sector M365/SharePoint configuration.



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PRSA Special Surgery, Glasgow

- ▶ Ryan Kerr, Head of Information Governance, Historic Environment Scotland

“The development and ongoing implementation of a Records Management Plan has been a catalyst for positive change in how HES values and manages its information. The PUR process has been beneficial as a means of tracking and demonstrating our progress both internally and externally. The surgeries run by the NRS have remained helpful throughout the process and are a great means to stay in regular contact with the Assessment Team and fellow public authorities. The NRS and the PRSA acts as a central point where Scottish Authorities can be brought together to pool their experiences and knowledge, and the need for this has never been more apparent than understanding how new technology, such as Microsoft 365, impacts organisations’ ability to successfully manage their information in a compliant and effective fashion.”

The PRSA assessment team agreed to set up a M365/SharePoint discussion area under the PRSA Knowledge Hub, to facilitate ongoing discussions and sharing of good practice. The Knowledge Hub forum now has 120 registered members.

Integration Joint Board Surgery

The 31 Integrated Joint Boards (IJBs), established by the Public Bodies (Joint Working) (Scotland) Act 2014, are public sector partnership bodies responsible for the planning, resourcing and operational oversight of health and social care services across Scotland.

We have been working closely with our IJB colleagues to advise on their statutory obligations under the Act.

Although IJBs are organised to deliver broadly matching functions, their approach to records management is necessarily different in each circumstance, because of the particular local arrangements which exist between the partner health boards and local authorities, who manage IJB records. The complexity of the relationships and differences between Boards has required NRS to undertake considerable engagement to understand these. These relationships shape the records management practices being relied upon by each Chief Officer to manage their public records. It also means that IJB plans, despite the similarity of functions being delivered by these bodies, can be very different.



PRSA conference, Glasgow

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We are pleased to report the IJB invitation and submission process is on track, and the assessment team are currently appraising the IJB submissions. To date we have received a total of fifteen IJB plans for assessment. Nine of these have so far achieved the Keeper's agreement.

In October 2019, we convened a surgery to help us fully explore and understand the situation and challenges across the IJB network. At this meeting we agreed the assessment team would adopt a nuanced case-by-case approach when assessing IJB RMPs. A number of IJBs were afforded new invitations and additional time to help them revisit their plans, and address issues identified by the assessment team.

We are pleased to report the IJB invitation and submission process is on track, and the assessment team are currently appraising the IJB submissions. To date we have received a total of fifteen IJB plans for assessment. Nine of these have so far achieved the Keeper's agreement.

PRSA Conference

A key outreach event this year was the third national conference held in Glasgow on 31 May, entitled "*Building on Public Records Scotland Act Success: Continuous Improvement and Digital Advance*".

As in previous years, the conference was run in partnership with the Scottish Council on Archives (SCA), the Information and Records Management Society Scotland, the Archives and Records Association (Scotland), and the Archivists of Scottish Local Authorities Working Group. There were 105 delegates in attendance at the conference.

The conference was aimed at practitioners, and focused on the important issues of continuous improvement under the Act, digital records management, and data innovation.

The opening address was given by Fiona Hyslop MSP, Cabinet Secretary for Culture, Europe and External Affairs. Ms Hyslop is the government minister who first introduced the Act in 2011. She reiterated that Scottish Ministers regard effective records management as key to ensuring that the public continue to have confidence that public authority business is conducted transparently, remains accountable, and their business is open to scrutiny. It is a powerful mechanism for improvement and efficiency, and helps us ensure compliance with other information legislation.

BUILDING ON PUBLIC RECORDS SCOTLAND ACT SUCCESS: CONTINUOUS IMPROVEMENT AND DIGITAL ADVANCE



A personal perspective by Kate Bolsover, Project Officer (Information & Records Management), Business Services – Legal & Governance, Aberdeenshire Council

The May 2019 PRSA Conference was a valuable reminder about why, as record keepers, we do what we do.

To hear directly from the PRSA team at the National Records of Scotland is always an education and this was certainly the case with the introduction to the revised Model Records Management Plan, and particularly the process behind the changes and the addition of the fifteenth element.

The Conference was also a rare opportunity to meet up with peers across other public authorities in person. Spare moments were well spent with other local authority record managers discussing current challenges and opportunities. The networking value of these events cannot be overestimated, especially for those working solo or in very small teams at our places of work.

I came away from the Conference proud of the work of record keepers across Scotland, and excited about my profession and its future.

The conference celebrated the collaboration and co-production which had successfully delivered tools and solutions that are helping the sector to better manage our records, and meet the aims of Scottish Ministers.



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The keynote speakers were followed by colleagues addressing issues, including the PUR mechanism, the challenges and opportunities presented by digital records management and data innovation, and the launch of the revised Keeper's Model Records Management Plan. The new Model Plan was achieved after several months of significant collaboration with stakeholders.

**BUILDING ON PUBLIC RECORDS SCOTLAND ACT
SUCCESS:
CONTINUOUS IMPROVEMENT AND DIGITAL ADVANCE**



A personal perspective by John Pelan,
Director, Scottish Council on Archives

As someone still relatively new to the archives and records management sector, I was particularly struck by the sheer variety of public sector bodies represented at the Building on Public Records Scotland Act Success conference. There were records managers or people with responsibility for records management from organisations across the sector, including police, health and social care, local and national government, forestry, water industry and education.

It was good to hear Fiona Hyslop MSP, Cabinet Secretary for Economy, Fair Work and Culture restate the enormous value that the Scottish Ministers place on the Act's role in strengthening the public sector's engagement with records and information management. Just as important was the role of records management in providing accountability, justice, and democracy for citizens.

The ongoing Scottish Child Abuse Inquiry is highlighting just how important records keeping is on an individual and societal level. This value, which the conference reinforced, needs even greater recognition, as ultimately, records are not just about data. They tell the stories of our lives.

Outreach activities

Bringing public authorities together to share knowledge and experience has proved invaluable, and we will continue to support such engagement.



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PRSA Surgery, Edinburgh

Our colleagues continue to support our outreach ambitions by providing us with access to venues, and we remain most grateful to all our colleagues for their continued support in challenging times. The Keeper in particular wishes to thank Aberdeenshire Council and Skills Development Scotland for providing us with an excellent venue this year, for our surgery programme. We are also grateful to Lindsay Turpie, Information Governance Officer, Dumfries and Galloway Council, Tigan Daspan, Records Manager, Food Standards Scotland, and Carol Dunn, Records Manager, West Lothian Council. These colleagues readily agreed to share their personal experience of developing and implementing their RMPs, their engagement with the PUR process, and the extent to which the Act helped influence practice within their own authorities.

In last year's report we described our engagement with the 'Access to Records' initiative involving the Centre for Excellence for Children's Care and Protection, Who Cares Scotland, and Social Work Scotland. We remained involved with the initiative this year, and in collaboration with colleagues from Who Cares

Scotland, were successful in having a proposal accepted to deliver a session at the University of Dundee, Centre for Archives and Information Studies' conference in April 2020, on Investigating the Archive: Memory, Identity and Authenticity. Our session was entitled '*Whose Record is it Anyway? Reflections on the Records of the Care Experienced in Post-Shaw Scotland.*' Unfortunately, due to COVID restrictions, the conference was unable to go ahead, but we will look for further opportunities in the future.

The BIG push

- **I**nformation **G**overnance is everyone's responsibility.
- We want to keep children and young people safe from harm.
- Thank you to everyone for their help so far, we have made significant progress.
- There is still work to be done. Help play your part.



Check it ...

Connected to our involvement in the Access to Records initiative is our ongoing liaison with the University College London's 'Memory, Identity, Rights in Records and Access' project (MIRRA). MIRRA's aim is to develop, through research, a better understanding of information rights in child social care contexts in England, with a particular emphasis on rights to privacy, confidentiality and access to records and data. Record keeping is a central theme of the research, and it draws on the experience of social work practitioners, information professionals, academic researchers and, most importantly, the care experienced individuals, whom the records are about. We will continue to work with MIRRA and the Access to Records initiative, and seek to bring together the learning from these projects.

This year we also worked closely with colleagues delivering the Scottish Government's Advance Payment Scheme for

survivors of in-care abuse, which was established in advance of the planned legislation for a statutory redress scheme. The proposed legislation is expected to pass its final Parliamentary stages before March 2021. A collaboration of Advance Payment Scheme colleagues, records managers, archivists, and those with responsibility for helping adult survivors of abuse in care source and access their care records, was set up. The collaboration extended to those from public and non-public archive services, and those who chair or lead various professional networks, to ensure the collaboration was comprehensive. The collaboration supports a focus group to gather views and ideas, and help deliver comprehensive and clear guidance to applicants, about in-care records. It is exploring the challenges that exist for survivors of abuse when searching for their records, and aims to deliver meaningful advice to help them negotiate the challenges.

The University of Stirling project 'Back to the Future: Archiving Residential Children's Homes (ARCH) in Scotland and Germany', which seeks to assist current residents of care trace their records and develop an archive of their care experience, became active again this year. The working group liaised over a revised application, and this was submitted in February 2020. The outcome will be known by the summer of 2020.

Continuous engagement

We continue to meet and discuss the Act with public authorities on a one-to-one basis, or in small groups, and to work closely with those developing plans for submission.



Crown copyright

PRSA meeting with the Scottish Fiscal Commission

This year, we again met with a number of authorities, including NHS National Services Scotland; Water Industry Commission for Scotland; Social Security Scotland; Caledonian Maritime Assets Ltd; Edinburgh Integration Joint Board; Office of the Scottish Charities Regulator; Scottish Fiscal Commission; Care Inspectorate; Independent Living Fund; Public Health Scotland; Inverclyde Council; Scottish Forestry; and Forestry and Land Scotland. These meetings provide the assessment team with the opportunity to speak directly to stakeholders about the Act, learn about their challenges and co-design solutions. This presents us with an important opportunity to influence strategic thinking and achieve early buy in from the senior leadership of authorities.



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PRSA meeting with Audit Scotland

Progress Update Review (PUR)

The PUR mechanism continues to be popular with stakeholders, with uptake remaining high. Reporting on progress under their agreed plans, and on local records management initiatives, helps promote the importance of sound records management practice.

The PUR 'health check' continues to be an informal process, and an increasingly vital part of our drive to achieve the aims of the Act, through meaningful dialogue with stakeholders.

► Angharad Stockwell, Records Manager and Data Protection Officer, Scottish Canals

“We have found the Progress Update Review (PUR) mechanism to be an invaluable tool for monitoring compliance with PRSA. It has enabled us to reflect on work undertaken so far to implement our records management plan, identify new areas for improvement, and look ahead to our goals for the coming year.”

Colleagues tell us that the annual invitation to engage is useful beyond ensuring policies and procedures are up to date. The PUR process requires liaison with senior managers and internal reporting. This has the effect of maintaining the profile of records management and supporting the aims of the Act.

This is only the second full year of PUR, and it remains too early to talk about trends, but we will now begin to monitor the process for this purpose.

Conferences and wider talks

We were again invited to participate at a number of key events this year.

In May 2019, we delivered papers at two sessions of the annual Information and Records Management Society conference, *“Information Governance: the Quest for Truth and Trust”*, Celtic Manor Resort, Wales. The conference considered issues beyond the onset of GDPR around trust and the handling of personal data, and the role of information and records managers in safeguarding informational and evidential truth for organisations. Our papers addressed the issues of to what extent legislation can bring about culture change in the world of records management, and a reflective analysis on where we are now in Scotland, six years after the Act came into force.



Crown copyright

PRSA team with the Pictish 'Rhynie man' stone, Aberdeenshire Council Offices

In August we spoke to a group of public sector Freedom of Information officers, at an event run by the Office of the Scottish Information Commissioner, about the critical role played by good records management in meeting other information legislation obligations. That same month, we delivered a similar talk to the NHS National Services Scotland Information Governance Forum in Edinburgh.

In January 2020, we delivered a lecture to students of the Glasgow University Information Management and Preservation post-graduate course. The lecture series we contributed to was considering the principles behind records management theory, professional principles and concepts, and compliance and regulatory requirements, for the proper creation, management and disposal of records.



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PRSA Surgery, Edinburgh

SECTION 5

Reflections on progress and looking forward



The Act, as intended, remains a positive driver of good practice and improvement in public sector records and information management.

This year saw sustained progress under the legislation. The number of agreed plans and increasing engagement with the Progress Update Review (PUR) scheme indicates, not only a strong commitment from authorities to achieve and maintain compliance with their legislative obligations, but also a desire to continually improve and innovate. The Act, as intended, remains a positive driver of good practice and improvement in public sector records and information management.

With so many plans and associated improvements agreed, it is vital that we closely monitor progress. The Progress Update Review (PUR) scheme is a voluntary, non-statutory process which has already demonstrated how pivotal it is to supporting scheduled authorities, as they continue to improve their records management approaches. It fosters stepwise continuous improvement, and the development of relationships between the assessment team and information and records management professionals within the authorities. We will continue to support this process, as we collectively work to deliver a stronger culture of good record keeping across the Scottish public sector.

Courtesy of the Royal Botanic Gardens Edinburgh



Surgery sessions have been the integral feature of our engagement strategy since the beginnings of the legislation, and remain popular, dynamic and beneficial for delegates and my assessment team.

Collaboration, engagement and communication with our stakeholder community has been a hallmark of the development of the Act. This year we continued to work closely with, not only our public sector colleagues, but also professional organisations across Scotland, the UK and beyond. It is imperative that my assessment team remain engaged and connected to records and information management practitioners, policy makers and professional groups, to ensure the legislation and its implementation is responsive and reflective. Over the coming year we will, again, seek to grow and strengthen our networks and alliances.

We have continued to pursue a blended engagement programme, with my team responding to invitations to engage face to face with public authorities, seeking out a variety of speaking opportunities to promote the Act, and running the PRSA surgery programme. Surgery sessions have been the integral feature of our engagement strategy since the beginnings of the legislation, and remain popular, dynamic and beneficial for delegates and my assessment team. The surgeries offer a space for our colleagues to come together, share knowledge and expertise, learn from one another and engage directly with my assessment team. These events allow me to remain alert to issues and challenges, and responsive to changing circumstances.



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We will continue to promote the PUR toolkit and work with colleagues who take the opportunity to benchmark their progress and activities through this scheme.

► Lindsay Turpie Information Governance Officer, Dumfries and Galloway Council

The launch of the revised Model Plan this year also marked our commitment to continuous improvement and development. It was appropriate that, after five years of operation, the Model Plan was revisited and revised to take account of the changing nature of society, legislation, technology and public sector service delivery. We will now look to review and strengthen the accompanying Guidance which supports the Model Plan. When originally developing these resources, we drew upon examples of good practice from across the world, which formed the basis of our Guidance Document. Since 2013, however, we have agreed the Records Management Plans of over 200 authorities, which provide exemplars of good records management policy and practice specific to the Scottish public sector. We intend, this year, to revisit the Guidance and, using the expertise and good practice examples from our stakeholders, develop a new suite of Guidance more reflective of our own record keeping landscape and challenges.

“During my recent experience of resubmitting Dumfries and Galloway Council’s Records Management Plan, the Model Plan and Guidance became my handbook and companion for numerous months. It was fantastic to get involved in helping shape the refresh of these documents through the Model Plan Stakeholder Forum. These are invaluable resources for Records Managers so it is extremely important to ensure they are fit-for-purpose for those that rely on them.”

Many of our plans have been agreed on an improvement basis, and it is vital, therefore, that we continue to work with stakeholders to monitor implementation and progress. Increased use of the PUR mechanism and our engagement events are critically important to such work, and we are not complacent in this task. We will continue to promote the PUR toolkit and work with colleagues who take the opportunity to benchmark their progress and activities through this scheme.



Crown copyright

PRSA Surgery, Edinburgh

The Scottish Public sector is an ever evolving landscape and we will engage with newly created authorities. Many of these are added to the Act under their own founding legislation. For the small number of authorities which are not added in this way, we will continue to advance our efforts to ensure that they are included as required under the Schedule to the Act, last updated under The Public Records (Scotland) Act 2011 (Authorities) Amendment Order 2015. We have already started this process and will seek to develop a new Scottish Statutory Instrument to update the Act in the near future.

As we look ahead to 2020 and beyond, there will be a number of changes to the way in which deliver our services. In this coming year, it is imperative that NRS remain engaged with our stakeholders and maintain progress under the Act. Although the current COVID-19 pandemic may limit face to face engagement, we will look to harness the opportunities of emerging technologies, to continue to connect with our stakeholder community, and provide essential assistance to our colleagues during this challenging time. We will seek to expand the use of the PRSA Knowledge Hub forum and we will upskill, adapting to new ways of working, collaborating and sharing.

As we live through emerging history, it will be vital that Scotland's national response is captured, managed and archived, to ensure that this experience can be scrutinised, understood and preserved for future generations.

We will continue to embrace the opportunity to work closely with professional groups, including the Scottish Council on Archives, The Information and Records Management Society Scotland, and the Archives and Records Association Scotland, to deliver solutions, advice and support.

We will be alert to the impact of COVID-19 on the records management landscape and we will seek to fully understand, track, monitor, support and advise, and where required intervene.

It is clear that the shift to remote working will require a rapid transition to a digital by default environment, and we will work with colleagues to understand and support the records management and digital archiving challenge that this might bring, and reflect this in our future programme of guidance and engagement events.

As we live through emerging history, it will be vital that Scotland's national response is captured, managed and archived, to ensure that this experience can be scrutinised, understood and preserved for future generations.

Citizen confidence in transparent, evidence based decision making is especially important in such times. Good records and information management is key to understanding this experience. It is vital, now more than ever, that records management processes are robust, resilient and responsive to the rapidly changing information landscape, technologies and working environment.

Transparent and accountable government relies on good records and information. The Act has set us on firm ground to meet the challenges which lie ahead, and it is essential that my team continue to collaborate, support and challenge in this coming year, to achieve the improved records management approaches expected by the people of Scotland.



Paul Lowe
December 2020

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SECTION 6

Annex One: Records Management Plans and Progress Update Reviews agreed 2019-2020

Records management plans agreed, 2019-2020

Authority	Date of Agreement	Sector
Western Isles Council Comhairle nan Eilean Siar	05-Apr-19	Local Authority
Western Isles Licensing Board	05-Apr-19	Local Authority
Midlothian Integration Joint Board	08-May-19	Health and Social Care
Moray Integration Joint Board	08-May-19	Health and Social Care
West Lothian Integration Joint Board	21-May-19	Health and Social Care
Clackmannanshire and Stirling Integration Joint Board	25-Jun-19	Health and Social Care
Revenue Scotland	07-Aug-19	Economic Development
South Ayrshire Integration Joint Board	07-Aug-19	Health and Social Care
Angus Integration Joint Board	19-Aug-19	Health and Social Care
Fife Integration Joint Board	19-Sep-19	Health and Social Care
East Renfrewshire Integration Joint Board	08-Oct-19	Health and Social Care
Independent Living Fund for Scotland	08-Oct-19	Health and Social Care
East Ayrshire Integration Joint Board	23-Jan-20	Health and Social Care
Dundee City Council	17-Mar-20	Local Authority
Dundee City Licensing Board	17-Mar-20	Local Authority

PUR Final Reports sent to authorities, 2019-2020

Authority	Final Report sent to CEO/SO	Sector
Police Scotland	02-Apr-19	Justice
Scottish Canals	02-Apr-19	Transport
NHS NSS National Services Scotland	11-Apr-19	Health and Social Care
Scottish Advisory Committee on Distinction Awards	11-Apr-19	Health and Social Care
Skills Development Scotland	24-Apr-19	Economic Development
Healthcare Improvement Scotland	26-Apr-19	Health and Social Care
and Scottish Health Council	26-Apr-19	Health and Social Care
Scottish Prison Service	03-May-19	Justice
Scottish Futures Trust	08-May-19	Economic Development
NHS Tayside	08-May-19	Health and Social Care
NHS Highland	28-May-19	Health and Social Care
Scottish Borders Council	28-May-19	Local Authority
Scottish Borders Licensing Board	28-May-19	Local Authority
Keeper of the Registers of Scotland	06-Jun-19	Culture, Leisure and Science
Fife Council	07-Jun-19	Local Authority
Fife Licensing Board	07-Jun-19	Local Authority
Food Standards Scotland	07-Jun-19	Governance
NHS Greater Glasgow and Clyde	07-Jun-19	Health and Social Care
Scottish Further and Higher Education Funding Council	12-Jun-19	Economic Development
Scottish Legal Complaints Commission	14-Jun-19	Justice
HM Chief Inspector of Prosecutions for Scotland	26-Jun-19	Justice
Inverclyde Council	09-Jul-19	Local Authority
Inverclyde Licensing Board	09-Jul-19	Local Authority
Aberdeenshire Council	19-Jul-19	Local Authority
Aberdeenshire Licensing Board	19-Jul-19	Local Authority
East Lothian Council	26-Jul-19	Local Authority
East Lothian Licensing Board	26-Jul-19	Local Authority
Board of Trustees of the Royal Botanic Garden, Edinburgh	30-Jul-19	Culture, Leisure and Science
NHS Forth Valley	31-Jul-19	Health and Social Care

Authority	Final Report sent to CEO/SO	Sector
NHS Shetland	17-Oct-19	Health and Social Care
Scottish Fire & Rescue Service	29-Oct-19	Justice
Ayrshire Valuation Joint Board	20-Sep-19	Local Authority
NHS Lanarkshire	17-Oct-19	Health and Social Care
Scottish Law Commission	25-Oct-19	Justice
Central Scotland Valuation Joint Board	12-Nov-19	Local Authority
Queen's and Lord Treasurer's Remembrancer	15-Nov-19	Economic Development
The Scottish Ministers: Scottish Government; Disclosure Scotland; Transport Scotland; Student Awards Agency for Scotland; Accountant in Bankruptcy	13-Nov-19	Governance
Scottish Agricultural Wages Board	13-Nov-19	Governance
Chief Dental Officer of the Scottish Administration	13-Nov-19	Governance
Chief Medical Officer of the Scottish Administration	13-Nov-19	Governance
HM Inspector of Anatomy for Scotland	13-Nov-19	Governance
HM Chief Inspector of Prisons	13-Nov-19	Governance
Independent Prison Monitors	13-Nov-19	Governance
Prison Monitoring Co-ordinators	13-Nov-19	Governance
HM Inspectorate of Constabulary in Scotland	13-Nov-19	Governance
HM Fire Service Inspectorate for Scotland	13-Nov-19	Governance
Safeguarders Panel	13-Nov-19	Governance
Drinking Water Quality Regulator for Scotland	13-Nov-19	Governance
Mobility and Access Committee for Scotland	13-Nov-19	Governance
Midlothian Council	06-Dec-19	Local Authority
Midlothian Licensing Board	06-Dec-19	Local Authority
Caledonian Maritime Assets (CMAL)	10-Dec-19	Transport
Scottish Canals	13-Dec-19	Transport
Standards Commission for Scotland	23-Dec-19	Governance
Scottish Public Pensions Agency	16-Jan-20	Governance
David MacBrayne Ltd	16-Jan-20	Transport
Scottish Qualifications Authority	17-Jan-20	Economic Development
Architecture and Design Scotland	06-Feb-20	Economic Development
Lanarkshire Valuation Joint Board	07-Feb-20	Local Authority
West Lothian Council	07-Feb-20	Local Authority
West Lothian Licensing Board	07-Feb-20	Local Authority

Authority	Final Report sent to CEO/SO	Sector
NHS Orkney	20-Feb-20	Health and Social Care
Scottish Social Services Council	21-Feb-20	Health and Social Care
Mental Welfare Commission for Scotland	24-Feb-20	Health and Social Care
Clackmannanshire Council	27-Feb-20	Local Authority
Clackmannanshire Licensing Board	27-Feb-20	Local Authority
State Hospital Board for Scotland (Carstairs)	11-Mar-20	Health and Social Care
Loch Lomond and the Trossachs National Park	18-Mar-20	Culture, Leisure and Science
Renfrewshire Council	31-Mar-20	Local Authority
Renfrewshire Licensing Board	31-Mar-20	Local Authority

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