

The Public Records (Scotland) Act 2011

Scottish Qualifications Authority

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

02 March 2023

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1. Public Records (Scotland) Act 2011

The Public Records (Scotland) Act 2011 (the Act) received Royal Assent on 20 April 2011. It is the first new public records legislation in Scotland since 1937 and came into force on 1 January 2013. Its primary aim is to promote efficient and accountable record keeping by named Scottish public authorities.

The Act has its origins in *The Historical Abuse Systemic Review: Residential Schools and Children's Homes in Scotland 1950-1995* (The Shaw Report) published in 2007. The Shaw Report recorded how its investigations were hampered by poor recordkeeping and found that thousands of records had been created, but were then lost due to an inadequate legislative framework and poor records management. Crucially, it demonstrated how former residents of children's homes were denied access to information about their formative years. The Shaw Report demonstrated that management of records in all formats (paper and electronic) is not just a bureaucratic process, but central to good governance and should not be ignored. A follow-up review of public records legislation by the Keeper of the Records of Scotland (the Keeper) found further evidence of poor records management across the public sector. This resulted in the passage of the Act by the Scottish Parliament in March 2011.

The Act requires a named authority to prepare and implement a records management plan (RMP) which must set out proper arrangements for the management of its records. A plan must clearly describe the way the authority cares for the records that it creates, in any format, whilst carrying out its business activities. The RMP must be agreed with the Keeper and regularly reviewed.

2. Progress Update Review (PUR) Mechanism

Under section 5(1) & (2) of the Act the Keeper may only require a review of an authority's agreed RMP to be undertaken not earlier than five years after the date on which the authority's RMP was last agreed. Regardless of whether an authority has successfully achieved its goals identified in its RMP or continues to work towards them, the minimum period of five years before the Keeper can require a review of a RMP does not allow for continuous progress to be captured and recognised.

The success of the Act to date is attributable to a large degree to meaningful communication between the Keeper, the Assessment Team, and named public authorities. Consultation with Key Contacts has highlighted the desirability of a mechanism to facilitate regular, constructive dialogue between stakeholders and the Assessment Team. Many authorities have themselves recognised that such regular communication is necessary to keep their agreed plans up to date following inevitable organisational change. Following meetings between authorities and the Assessment Team, a reporting mechanism through which progress and local initiatives can be acknowledged and reviewed by the Assessment Team was proposed. Key Contacts have expressed the hope that through submission of regular updates, the momentum generated by the Act can continue to be sustained at all levels within authorities.

The PUR self-assessment review mechanism was developed in collaboration with stakeholders and was formally announced in the Keeper's Annual Report published on 12 August 2016. The completion of the PUR process enables authorities to be credited for the progress they are effecting and to receive constructive advice concerning on-going developments. Engaging with this mechanism will not only maintain the spirit of the Act by encouraging senior management to recognise the need for good records management practices, but will also help authorities comply with their statutory obligation under section 5(1)(a) of the Act to keep their RMP under review.

3. Executive Summary

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

4. Authority Background

Scottish Qualifications Authority (SQA) develops, assesses and awards qualifications taken in workplaces, colleges and schools. They provide qualifications across Scotland, the UK and internationally.

Separately, as SQA Accreditation, they authorise all vocational qualifications (other than degrees) delivered in Scotland.

A Chair and Board are appointed by the Scottish Government to oversee and direct SQA. There is also an Advisory Council appointed by the Scottish Government to provide independent advice to Ministers and SQA.

A permanent staff, headed by the Chief Executive, manages and carries out the development and delivery of new and existing qualifications. Additional members of staff are appointed as required on a short-term contract or secondment basis to undertake duties relating to particular projects.

The Management Team is responsible to the Chair and the Board for day-to-day operations.

SQA's *Management Statement* and *Financial Memorandum*, drawn up in consultation with the Scottish Government Education Department, sets out the broad framework within which they operate. This includes:

- the rules and guidelines relevant to the exercise of SQA functions, duties and powers.
- the conditions under which any public funds are paid to SQA.
- how SQA are to be held to account for their performance.

<http://www.sqa.org.uk/sqa/70972.html>

5. Assessment Process

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

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

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

Key:

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

Element	Status of elements under agreed Plan 13AUG15	Progress status 24JAN22	Progress status 02MAR23	Keeper's Report Comments on Authority's Plan 13AUG15	Self-assessment Update 26NOV21	Progress Review Comment 24JAN22	Self-assessment Update as submitted by the Authority since 24JAN22	Progress Review Comment 02MAR23
1. Senior Officer	G	G	G	Update required on any change.	No change.	Update required on any change.	No change.	Thank you for letting the Assessment Team know that there have been no changes to this Element. Update required on any change.
2. Records Manager	G	G	G	Update required on any change.	No change.	Update required on any change.	No change to SQA's Records Manager. SQA has created a new role to increase the resource available for records management. A new Records Officer was appointed in May 2022.	Thank you for this update, and the welcome news that further resource has been allocated to records management in the form of a Records Officer post. Update required on any change.
	G	G	G	Scottish Qualifications Authority demonstrates a	The Records Management Policy	The Keeper's Assessment Team	The annual review of the	The Assessment

3. Policy				<p>high level of compliance under this element and there is a commitment to review the Policy in February 2016. The Keeper would welcome having sight of the updated Policy following this review, particularly if significant changes take place.</p>	<p>has been updated and the Keeper is provided with an updated version (Item 1).</p> <p>The annual review of the policy is currently underway. This is being undertaken as part of a comprehensive review of all SQA's information governance policies to ensure that these adequately reflect changes in practice resulting from continued home working.</p>	<p>thanks SQA for this update and confirms the receipt of the Records Management Policy. It is positive to hear that SQA is actively reflecting on the changes in working practices in its policy landscape.</p>	<p>Records Management policy has been undertaken. The Keeper is provided with an updated version (item 1).</p> <p>This policy, along with SQA's other information governance policies, is currently undergoing an EqlA and review by SQA's trade unions. Once these actions have been completed the policy will be published and communicated to all staff.</p> <p>The Information Governance team has developed a series of lunch and learn sessions for staff covering all aspects of information governance including records management. The first records management session was designed to support the implementation of the Records Management policy and ran on the 12th of October. The Keeper is provided with a copy of the presentation (item 2). Further planned sessions</p>	<p>Team thanks you for letting us know that the RM Policy has been updated according to the regular review schedule; a copy of this has been received with thanks. It is also good to know that an Equality Impact Assessment is ongoing, as is trade union review, following which the Policy will be made available to staff.</p> <p>For comments on RM training, see Element 12.</p>
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							are detailed in the training programme provided to the Keeper (item 3).	
4. Business Classification	A	A	A	<p>The Scottish Qualifications Authority's Records Management Policy identifies the need to produce a comprehensive classification scheme encompassing the functions, activities and transactions of the authority. To achieve an operational classification scheme which is mapped against existing folder structures the <i>Improvement Plan</i> entails a pilot project for 2015, with full roll-out of the classification scheme in 2018. The Keeper commends this initiative and requests periodic updates as this work progresses.</p> <p>The Keeper agrees this element of the SQA's Records Management Plan on 'Improvement Model' terms. This means that he acknowledges that the Authority has recognised a gap in records management</p>	<p>SQA is continuing to review the potential use(s) of the O365 products. This includes investigating the use of SharePoint for the creation and management of SQA's information and records.</p> <p>A review of SQA's suite of records management guidance was completed in September. Following this, changes have been made to SQA's guidance on folder structures. The Keeper is provided with an updated version (Item 2).</p>	<p>Element 4 specifies that the Keeper expects the authority to have properly considered business classification mechanisms A classification structure allows an authority to map its functions as well as providing a system for operating an effective disposal schedule.</p> <p>The Assessment Team thank SQA for indicating they are still reviewing the potential longer-term uses of O365 products. The implementation would have implications on all aspects of records management, and a comprehensive review of SQA's current records management guidance</p>	<p>SQA continues to review the potential use(s) of the O365 products.</p> <p>SQA's Records Officer has commenced work with Information Reps from each business area to better understanding of how they are managing their information and records to identify any areas for improvement regarding existing folder structures and implementation of the retention schedule.</p>	<p>The Assessment Team thank SQA for indicating they are still reviewing the potential longer-term uses of O365 products. It is positive to hear that work has been commenced to understand the structure of information management within each business area, which will assist in the development and implementation of a reviewed Business Classification Scheme and subsequent updates to retention scheduling processes.</p>

				<p>provision (the Business Classification Scheme is not fully operational) and has put processes in place to close that gap. He agrees this element on the understanding that he will be provided with updates as the project advances.</p>		<p>documents is a positive first step in this long process.</p> <p>The Team acknowledges the receipt of the guidance document on folder structures with thanks and looks forward to updates in subsequent PURs. We look forward to updates particularly regarding updates to the Business Classification Scheme.</p> <p>This element remains at Amber while this work is ongoing.</p>		<p>This element remains at Amber while this work is ongoing.</p>
5. Retention Schedule	G	G	G	<p>Update required on any change.</p>	<p>Updates to SQA's retention schedule continue to be made on an ongoing basis, with a more formal review undertaken annually.</p> <p>This year's formal review is currently underway. However, amendments have been made since</p>	<p>Thank you for this update on regular review of SQA's retention schedule. The Assessment Team also acknowledges the receipt of this document with thanks.</p>	<p>The formal review of SQA's retention schedule was completed at the end of 2021.</p> <p>Further updates have been made since then and the Keeper is provided with an updated copy of SQA's retention schedule (item 4)</p> <p>The next annual review</p>	<p>It is great to hear that SQA is keeping up with its scheduled Retention Schedule reviews, and that a formal review has been completed in 2021.</p> <p>The receipt of</p>

					SQA's last progress update. The Keeper is therefore provided with an updated copy of SQA's retention schedule (Item 3).		is scheduled for January 2023.	the Schedule is acknowledged with thanks.
6. Destruction Arrangements	G	G	G	Update required on any change.	<p>Some amendments have been made to the Retention and Disposal Policy and the Keeper is provided with an updated version (Item 4).</p> <p>However, the annual review of the policy is still underway. This is being undertaken as part of the comprehensive review of SQA's information governance policies to reflect changes in practice resulting from continued home working.</p> <p>Following the review of SQA's suite of records management guidance, improvements have been made to SQA's disposal</p>	<p>The Assessment Team notes that an amended Retention and Disposal Policy is available and acknowledges that a copy has been supplied.</p> <p>The comprehensive review of all information governance policies taking into account changes in working practices is a welcome undertaking.</p> <p>Thank you also for providing the Keeper's Assessment Team with updated disposal guidance and destruction forms.</p>	<p>The annual review of the Retention and Disposal policy has been undertaken. The Keeper is provided with an updated version (item 5).</p> <p>This policy, along with SQA's other information governance policies, is currently undergoing an EqIA and review by SQA's trade unions. Once these actions have been completed the policy will be published and communicated to all staff.</p>	<p>The Keeper's Assessment Team acknowledges the receipts of the reviewed Retention and Disposal Policy with thanks. The ongoing EqIA and review by trade unions is also noted.</p> <p>Update required on any future change.</p>

					guidance and associated destruction forms. The Keeper is provided with copies both (Items 5 and 6).			
7. Archiving and Transfer	G	G	G	Update required on any change.	No change.	Update required on any change.	No change.	Update required on any change.
8. Information Security	G	G	G	It is clear that this authority takes information security seriously and has a suite of policies governing procedures and guidance in this area. SQA are currently reviewing the Computer and Communications Acceptable Use Policy and have agreed to submit all revised documents to the Keeper to ensure that the evidence package for this authority remains up-to-date. This is welcomed by the Keeper and he looks forward to receiving these updated documents when available.	SQA's Information Security, Access Control and IT Acceptable Use policies are currently being reviewed as part of the comprehensive review of SQA's information governance policies. The online training modules on information security (levels 1 and 2) noted in the SQA's previous update have now been undertaken by all staff. The modules continue to form part of SQA's induction programme for all new members of	Thank you for this update on current review of Information Security, IT Acceptable Use and Access Control policies. Under Element 8, a public authority is responsible for showing it has procedures in place to adequately protect its records through information security provision. Based on this update, it appears that SQA continues to keep key policies up to date. The update on staff training is addressed under Element 12	SQA's Information Security, Clear Desk and Clear Screen, Access Control and IT Acceptable Use policies have been reviewed and updated. The Keeper is provided with updated versions of the Information Security and Clear Desk and Clear Screen policies (items 6, 7). These policies, along with SQA's other information governance policies, are currently undergoing an EqlA and review by SQA's trade unions. Once these actions have been completed the policies will be published and communicated to all	This update on relevant policy reviews has been noted with thanks. Thank you for letting us know SQA no longer holds Cyber Essentials certification. While external benchmarks like this can be helpful to maintain focus, they are not a requirement. Thank you for also confirming that additional security through multi-factor

				<p>staff and must be completed within 4 weeks of their start date. Within this period new members of staff are also required to read and confirm they have read the following policies:</p> <ul style="list-style-type: none"> • Information Security • Data Protection • Acceptable Use • Email <p>As part of the annual Cyber Scotland week, SQA's Information Governance team again published a series of articles and engaged staff in discussions across SQA's intranet and internal communication channels.</p>	(Competency Framework).	<p>staff.</p> <p>There are some outstanding queries related to the other two policies (Access Control and IT Acceptable Use). These are currently being addressed with colleagues within SQA. We will provide the Keeper with updated copies once these have been finalised.</p> <p>Following changes to the certification process, SQA no longer holds the Cyber Essentials certificate referenced in the 2020 update.</p> <p>Multi Factor Authentication has been implemented for SQA's Office 365 applications for both internal staff and external users and third parties that have been granted use of an SQA account.</p>	<p>authentication in O365 apps is now in use.</p> <p>Update required on any change.</p>	
9. Data Protection	G	G	G	Like Element 8, there is a similar commitment from the authority to submit revised documents to the	SQA's Data Protection Policy has been updated and the Keeper is	The updated Data Protection Policy is received with thanks, and the	The annual review of the Data Protection policy has been undertaken. The Keeper is provided	Thank you for confirming that SQA's Data Protection policy

				<p>Keeper following any reviews of policies such as the Privacy Statement. Again the Keeper commends this approach and looks forward to having sight of any revised documents.</p>	<p>provided with a new version (Item 7).</p> <p>This policy is being further reviewed as part of the comprehensive review of SQA's information governance policies.</p> <p>The online training module noted in the SQA's previous update has now been undertaken by all staff. The module continues to form part of SQA's induction programme for all new members of staff and must be completed within 4 weeks of their start date.</p> <p>Updates have been made to both SQA's staff privacy statement and the privacy statement for candidates and other service users.</p> <p>The Keeper is provided with a copy of the staff privacy statement</p>	<p>ongoing, wider review endeavour noted.</p> <p>Training-related updates are addressed under Element 12 below.</p> <p>Updates to SQA's Privacy Statements and Record of Processing are noted with thanks. It is clear that SQA continues to take its data protection obligations seriously.</p>	<p>with an updated version (item 8).</p> <p>This policy, along with SQA's other information governance policies, is currently undergoing an EqIA and review by SQA's trade unions. Once these actions have been completed the policy will be published and communicated to all staff.</p> <p>A new Processing of Special Category and Criminal Offence Data policy has been implemented. This explains SQA's procedures for complying with the data protection principles (Article 5 UK GDPR) in relation to the processing of special category personal data and criminal offence data. The Keeper is provided with a copy (item 9).</p> <p>Updates have been made to SQA's privacy statement for candidates and other service users.</p>	<p>is continuing to be kept under regular review. The receipt of this policy is noted with thanks.</p> <p>Thank you also for letting the Assessment Team know SQA's Privacy Statement has been updates, and that a new Processing of Special Category and Criminal Offence Data Policy has now been implemented. A copy of this has been received.</p> <p>For comments on training, see Element 12.</p> <p>It is great to hear that further resource has been allocated to data protection, and that a new</p>
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					<p>(Item 8) whilst the privacy statement for candidates and other service users can be accessed on SQA's website.</p> <p>A review and update of SQA's record of processing was completed in August. This is also available on SQA's website.</p>		<p>This can be accessed on SQA's website.</p> <p>The Information Governance team has developed a series of lunch and learn sessions for staff covering all aspects of information governance including data protection. The Keeper is provided with a copy of the presentation (item 10). Further planned sessions are detailed in the training programme provided to the Keeper (item 3).</p> <p>SQA has created a new role to increase the resource available for data protection. A new Data Protection Analyst was appointed in May 2022.</p>	<p>Data Protection Analyst is now in post.</p> <p>It is clear from this update that SQA continues to take its data protection obligations seriously.</p>
10. Business Continuity and Vital Records	G	G	G	<p>The <i>Improvement Plan</i> notes that SQA are committed to appointing and training business continuity co-ordinators in each local area of the organisation. The use of local, trained personnel is considered good practice and the Keeper would like</p>	<p>SQA's Business Continuity policy continues to undergo an annual review.</p> <p>The test and exercise group, referred to in our previous</p>	<p>Thank you for confirming that SQA's Business Continuity Policy continues to be reviewed annually.</p> <p>It is positive that the test and exercise group is following a</p>	<p>SQA's Business Continuity Policy was reviewed and updated at the end of 2021. It was communicated to the organisation in Jan 2022. The Keeper is provided with an updated version (item 11)</p>	<p>Thank you for this update on Business Continuity Policy update, and providing us with a copy (received with thanks).</p>

				<p>to be informed when these positions have been created should they have an effect on record recovery procedures.</p>	<p>submissions, has developed a 3-year test and exercise plan. Year 1 of this plan is being implemented in 2021/22.</p> <p>A live exercise involving the distribution of NQ assessment materials is currently being planned. A tabletop exercise is scheduled for December and cyber and ransomware training exercise for SQA's Executive Management Team and Incident Management Team is scheduled for January.</p> <p>The business continuity and incident management programme of training mentioned in the last update has been delivered.</p>	<p>3-year plan, and that SQA has just implemented live exercises to test the robustness of various business continuity areas. The Assessment Team look forward to hearing about the outcomes of these in consecutive PURs.</p> <p>It is great to hear that business continuity and incident management programme of training and awareness has been implemented.</p>	<p>Three Business Continuity Co-ordinators and all Incident Management (IMT) support staff successfully completed the BCI Basics online module. In addition, two of the IMT Support team are undertaking training provided by our third-party provider.</p> <p>Development of an SQA Business Continuity training module is underway along with a review of existing guidance.</p> <p>The cyber and ransomware training exercise for SQA's Executive Management Team and Incident Management Team referenced in the last update took place in January 2022.</p> <p>The live exercise of NQ assessment materials referenced in the last update has been postponed due to other</p>	<p>We are grateful for the notification that the cyber and Ransomware training exercise has taken place, but that the live exercise of NQ assessment materials that was planned has been postponed.</p> <p>Please see comments on training under Element 12.</p>
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							operational and business commitments.	
11. Audit Trail	G	G	G	Update required on any change.	Following the review of SQA's suite of records management guidance, changes have been made to SQA's guidance on naming conventions and version control. The Keeper is provided with an updated copy of both (Items 9 and 10).	Thank you for providing the Keeper's Assessment Team with copies of the reviewed guidance on naming conventions and version control.	No change.	Update required on any change.
12. Competency Framework	G	G	G	Update required on any change.	As mentioned in relation to elements 8 and 9, training modules on information security and data protection have now been undertaken by all SQA staff. SQA's Information Governance Manager and Data Protection and Records Manager continue to attend CPD events and undertake relevant training.	It is reassuring to see that training on data protection and information security has been undertaken by all staff. We also thank you for the update on Continuing Professional Development of both the Information Governance Manager and the Data Protection and Records Manager. As addressed under Elements 8 and 9, it is good to	As mentioned in relation to elements 3 and 9, the Information Governance team has developed a training programme covering all aspects of information governance, including a series of lunch and learn sessions for staff. The Keeper is provided with copies of presentations for the lunch and learn sessions that have taken place so far (items 2 and 10). As well as a copy of the training plan detailing the full programme (item 3), which cover other	Reported under Elements 3 and 9, SQA's update on the Lunch and Learn sessions is noted, and the items submitted in relation to these have been received. It is good to see that IG and RM receive regular attention at SQA, including CPD. As reported under Element 10, we also note

					hear that staff training in information security is a key part of induction. SQA's engagement with the annual Cyber Scotland week is also noted with thanks.	elements within the RMP. SQA's Information Governance Manager, Data Protection and Records Manager, Data Protection Analyst and Records Officer all attend CPD events and undertake relevant training.	the Business Continuity Institute's online training, as well as additional third-party training. It also very is good to hear that a tailored SQA Business Continuity training module is being developed.	
13. Assessment and Review	G	G	G	SQA demonstrate a high level of compliance under this element as reflected in the planning of regular reviews of key documents such as the <i>Records Management Policy</i> and the <i>Retention Schedule</i> as well as a review of the Plan itself in 2016. The Keeper commends these scheduled reviews, particularly where they involve engagement at a local level through 'Information Reps'. The authority has agreed to submit relevant updates following these reviews to the Keeper. This is welcomed by the Keeper.	No change.	Update required on any change.	No change.	Update required on any change.

				The <i>Improvement Plan</i> suggests that the Plan may fall under the authority's Internal Audit programme in the future. The Keeper commends this idea and would welcome updates on the work being done in this area.				
14. Shared Information	G	G	G	Update required on any change.	<p>A review of SQA's data sharing agreements was completed in September. As part of this review some changes were also made to SQA's data sharing agreements templates.</p> <p>No changes have been made to the data sharing guidance or processes.</p>	Thank you for keeping the Assessment Team up to date on the regular review of data sharing agreements.	<p>No change.</p> <p>A review of SQA's data sharing agreements will commence in January 2023.</p>	<p>Thank you for letting the Assessment Team know that there have been no changes to this Element.</p> <p>It is good to hear that SQA's Data Sharing Agreements have recently entered a review process.</p> <p>Update required on any change.</p>

7. The Public Records (Scotland) Act Assessment Team's Summary

Version

The progress update submission which has been assessed is the one received by the Assessment Team on 31st October 2022. The progress update was submitted by Kirsty Hurt, Data Protection and Records Manager.

The progress update submission makes it clear that it is a submission for **Scottish Qualifications Authority**.

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

General Comments

Scottish Qualifications Authority continues to take its records management obligations seriously and is working to bring all elements into full compliance.

Section 5(2) of the Public Records (Scotland) Act 2011 provides the Keeper of the Records of Scotland (the Keeper) with authority to revisit an agreed plan only after five years has elapsed since the date of agreement. Section 5(6) allows authorities to revise their agreed plan at any time and resubmit this for the Keeper's agreement. The Act does not require authorities to provide regular updates against progress. The Keeper, however, encourages such updates.

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

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

Based on the progress update assessment the Assessment Team considers that Scottish Qualifications Authority continue to take their statutory obligations seriously and are working hard to bring all the elements of their records management arrangements into full compliance with the Act and fulfil the Keeper's expectations.

The Assessment Team recommends authorities consider publishing PUR assessment reports on their websites as an example of continued good practice both within individual authorities and across the sector.

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

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

Iida Saarinen
Public Records Officer