



National  
Records of  
Scotland



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Public Records (Scotland) Act 2011  
**Report by the Keeper of the  
Records of Scotland 2020 - 2021**

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# 01



## 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) setting out progress made during the year ending 31 March 2021.

National Records of Scotland (NRS) is required to provide guidance and support under the Act to ensure Scottish public authorities have the skills and knowledge required to improve record keeping, governance and efficiencies within authorities and to increase accountability at a local level.

The Act also requires that public authorities must prepare, implement and keep under review a Records Management Plan (RMP) setting out arrangements for the management of records they hold or create. These RMPs must be submitted for my agreement and once agreed, these plans must be implemented and regularly reviewed.

In the past year, we agreed twelve plans and sent invitations to twelve public authorities. I am pleased to report that once again, I did not find it necessary to return any authority's plan in the reporting year. This is a very encouraging sign that authorities are aware of their responsibilities under the Act and are acting accordingly to ensure compliance.

I have continued to review previously agreed RMPs this year and while I was able to identify areas for improvement, I have been impressed by the rigour and professionalism demonstrated by the two authorities who resubmitted their plans.

Authorities have continued to take part enthusiastically in our Progress Update Reviews. This provides authorities with a non-statutory improvement mechanism to benchmark their records management and information governance processes over time.

COVID-19 has continued to impact organisations and society as a whole in a range of ways. It is at times such as these where good standards of public record keeping are even more important, since they will tell the enduring story of how public authorities have responded during the pandemic, informing our understanding both now and in the future.

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I am pleased to say that my Public Records Act assessment team has shown considerable ingenuity during the disruption of the pandemic in creating a new programme of online surgeries, webinars and one-to-one meetings to ensure that critical engagement has continued during this time.

The team has focused on building our online community, particularly by making better use of the PRSA Knowledge Hub space. Online working has allowed them to offer guidance and expertise to 29 public authorities this year, as well as learning about the challenges they have faced during the pandemic.

This has helped the team to make new connections and networks and enabled new projects including the COVID-19 survey of stakeholders, designed to assess the impact of the pandemic on archives in the public sector. We have also seen increased engagement internationally, working collaboratively with colleagues in Europe, America and Australia.

The team's outreach work has underlined the common challenges facing record keeping authorities around the world and the importance of our core work in supporting and advising authorities, promoting continuous improvement and carrying out assessment.

We continue to work collaboratively with colleagues across the public sector to support and measure the improvement in records management practice that is a vital part of good governance and democracy. Building these connections is ensuring that the Act helps to better secure people's rights and adds to Scotland's collective memory.

Paul Lowe



Keeper of the Records of Scotland  
December 2021

# 02

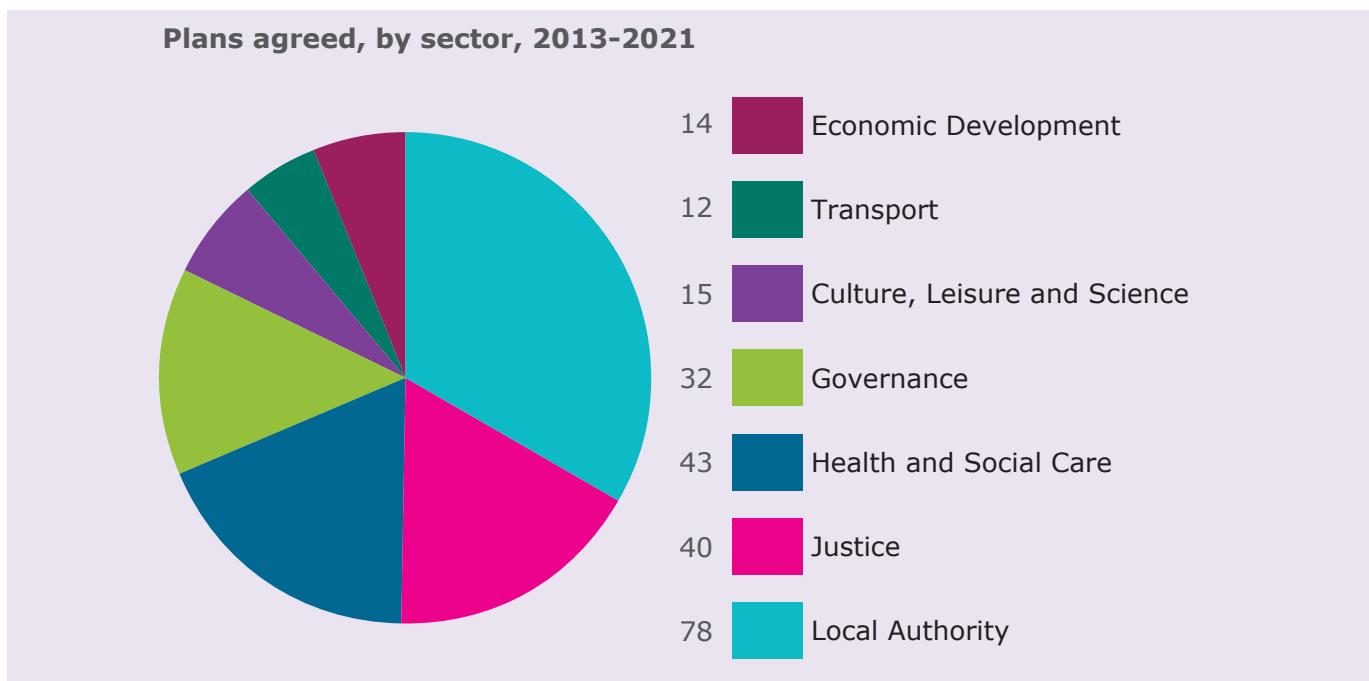
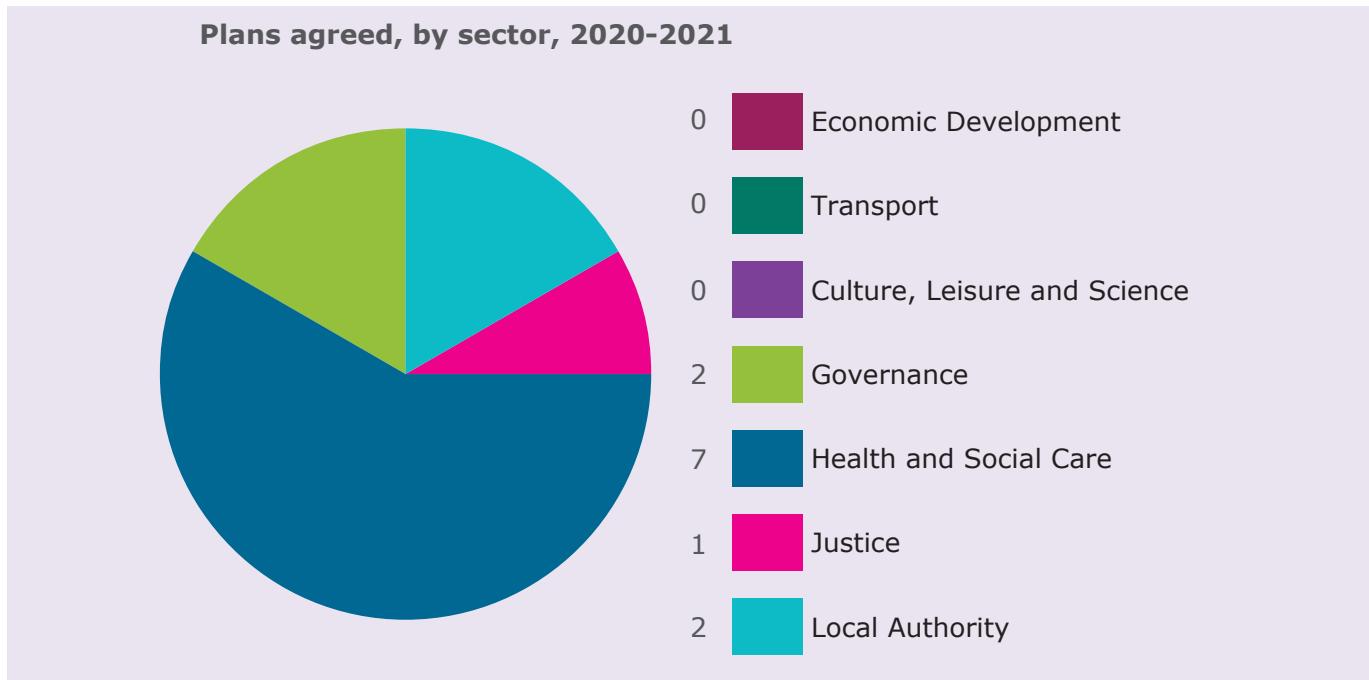
## Section 2

### Review of the year

Record Management Plans	<b>12</b> invitations issued	<b>28</b> authorities invited to submit reviewed plans <b>2</b> voluntary re-submissions under Section 5(6) of the Act <b>30</b> reviewed plans submitted	<b>246</b> plans agreed since Jan 2013 <b>277</b> invitations issued since Jan 2013
Progress Update Review	<b>223</b> invitations issued	<b>54</b> final reports issued	<b>7.85%</b> decrease on previous year
Engagement	<b>25</b> one-to-one meetings with public authority key contacts	<b>2</b> PRSA surgeries delivered to stakeholders <b>42</b> stakeholders attend PRSA surgeries	<b>4</b> papers on PRSA delivered to external and internal events <b>21</b> stakeholder and professional meetings and events attended

## Records management plans agreed by sector

A total of 12 plans were agreed in 2020-2021 out of 246 plans agreed since 2013



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## Presentations on Act delivered at internal and external events, 2020-2021

Organisation	Location	Date
Archivists in Scottish Local Authorities Working Group	Online	17-Sept-20
University of Glasgow Information Management Course	Online	20-Jan-21
PRSA Surgery	Online	08-Mar-21
PRSA Surgery	Online	16-Mar-21

## 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.<sup>2</sup>

The Public Records (Scotland) Act 2011 (the Act),<sup>1</sup> implemented in 2013, aims 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 2018 the Keeper collaborated with stakeholders to update his Model Records Management Plan (Model Plan) and Guidance Document, first published in 2012. The resulting new Model Plan was published in May 2019. The supporting Guidance Document is currently under review and will be finalised for publication in 2021. It will be published alongside the Keeper's Model Plan and Proper Arrangements Guidance.<sup>3</sup>



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 [Historical Abuse Systemic Review: Residential Schools and Children's Homes in Scotland 1950 to 1995 \(webarchive.org.uk\)](https://webarchive.org.uk/)  
3 <http://www.nrscotland.gov.uk/record-keeping/public-records-scotland-act-2011/resources>

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Since the Act came into force the Keeper has agreed 249 plans and issued 277 invitations.

## Plans agreed

A total of 12 plans were agreed this year and 12 authorities were invited to submit plans.

## 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 will continue across 2021 to identify new bodies not currently covered under the schedule for inclusion under a future Scottish Statutory Instrument.

## Improvement and Progress

The Keeper remains committed to supporting improvement over time. The processes that were co-produced to help implement that Act continue to assist authorities in identifying gaps in their records management arrangements and develop solutions to close them.

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Four years after launching the PUR process it has become an established part of the PRSA landscape.

## Progress Update Review

The Progress Update Review (PUR) mechanism, first introduced in 2017, our co-produced non-statutory improvement process, continues to be popular with stakeholders and remains a valuable source of vital information for the Keeper as he monitors the impact of the Act. As well as delivering a popular reporting mechanism, PUR provides us with an informal, more frequent snapshot of improvement activity across participating authorities. Already approximately one third of all authorities routinely engage with the PUR process and a number of authorities have provided positive feedback on their experience of participating. It provides external validation of ongoing improvement activity, maintains visibility of records management practice within their organisations and supports preparations for formal review of plans.

Each assessment and report on the findings is published to [PRSA pages of the NRS website](#).<sup>4</sup>

Four years after launching the PUR process it has become an established part of the PRSA landscape. Despite being entirely voluntary, in the last reporting year we received 54 PUR reports from scheduled authorities for the consideration of the assessment team.

The impacts of the global pandemic on authorities and NRS has meant that progress in reviewing the PUR reports has been slower than normal. However, we anticipate that normal service will have been resumed by the Autumn of 2021.

In 2021/22 we intend to collate and analyse the information amassed from PUR responses. We will use this to inform priorities around the further development of guidance and training.

<sup>4</sup> [Progress Update Review \(PUR\) - Assessment Reports | National Records of Scotland \(nrscotland.gov.uk\)](#)

## Review of Plans under Section 5

Section 5 of the Act allows the Keeper to require scheduled public authorities to review and resubmit their records management plan for his agreement. However, the Act is clear that "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." (Section 5(2)). The previous annual report provided an update on how that was progressing against the small number of authorities he invited to participate. Again, responding to the impact of the global pandemic on authorities, we paused our resubmission programme in 2020. This proactive programme of resubmission will however commence again in Autumn 2021 when we intend to widen this out, inviting more authorities to comply with this formal 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](mailto:public_records@nrscotland.gov.uk)



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

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## Section 4

### Engagement



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Our surgeries bring together colleagues from across the public sector and feedback continues to demonstrate that stakeholders value the opportunity they offer to network and share learning. They also ensure we remain visible to stakeholders, maintain relationships and support each other to understand the challenges we each face. They are a highlight of the PRSA calendar.

The Keeper is committed to working closely with stakeholders to develop and co-produce advice and guidance that will benefit authorities and advance standards in public record keeping. This approach has been key to much of the success that has been so far achieved under the Act. Stakeholder feedback confirms they value our engagement in helping to co-develop robust records management plans. They further acknowledge this work helps them comply with other statutory obligations. Face-to-face engagement was not possible this year because of the COVID-19 restrictions, but we liaised and collaborated using online communication tools to ensure links with stakeholders were maintained and strengthened.

## General surgeries

The restrictions put in place this year to protect us from COVID-19 required us to manage this process differently. Physical events had to be cancelled but as online collaboration tools became more broadly available we met virtually, first with single authorities and then with groups. The success of this online collaboration meant we were able to run two surgeries during 2021.

The focus of the surgeries has also changed this year, concentrating on reconnecting with colleagues and bringing them up to speed with the implementation programme. We did introduce topics of current importance, such as the greater use of technology solutions, such as Microsoft Office 365, as part of records management practice, and third party compliance under PRSA. Another topic of considerable interest is the requirement under the Act for authorities to have archive transfer arrangement in place. Not all public authorities archive with the NRS, but we took the opportunity to address this subject by speaking to our stakeholders. This looked at the selection and deposit process they manage, which ensures records of enduring value are safely transferred to National Records of Scotland, and demonstrated the importance of robust archive transfer arrangements. The principles outlined apply regardless of the archive service involved and so had broad relevance.

Online events were not just very popular, they were instantly more inclusive. Our two virtual surgeries attracted 42 public authorities, but more importantly they attracted colleagues from Orkney to Dumfries and Galloway and everywhere in between.

It was clear from the surgery feedback that demand remains high and that virtual events offer a way of communicating into the future beyond the relaxation of all COVID-19 restrictions.

## Outreach activities

The essential task of engaging with individual stakeholders to discuss routine records management issues was initially challenging under lockdown, but as soon as we could we reinstated this vital communication. With the technology in place we embarked on a series of one-to-one meetings with individual authorities to offer guidance and support. Over the course of the year we engaged this way with twenty-five key contacts responsible for the records of thirty-nine public authorities.

### Meetings with public authorities 2020 - 2021

Forestry and Land Scotland	Renfrewshire Council and Licensing Board
Fife Council and Licensing Board	North Lanarkshire Council and Licensing Board
Scottish Commission on Social Security	West Dunbartonshire Council and Licensing Board
NHS Lanarkshire	Audit Scotland/Auditor General/ Accounts Commission
Orkney Islands Council and Licensing Board	Scottish Canals
Renfrewshire Integration Joint Board	Falkirk Council and Licensing Board
Keeper of the Records of Scotland and Registrar General	Scottish Police Authority
Moray Council and Licensing Board	East Lothian Integration Joint Board
Orkney Integration Joint Board	Dundee Integration Joint Board
Strathclyde Partnership for Transport	Angus Council and Licensing Board
Glasgow City Council and Licensing Board	East Lothian Council and Licensing Board
Scottish Enterprise	Scottish Parliament
Inverclyde Council and Licensing Board	

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We also contributed to five meetings of the NHS Scotland Records Management Forum, where we engaged over NHS Scotland's transition to Microsoft 365. We further participated in a number of one-off events, such as the Archives and Records Association records managers and information governance section AGM, meetings of the Archivists of Scottish Local Authority Working Group and an extraordinary meeting of the Information and Records Management Society. We also attended the annual conference of the Scottish Information Commissioner.

In addition to engaging with specific authorities and groups of authorities, we communicated more generally by posting information and contributing on the Public Records Scotland Act Knowledge Hub space. Over the course of the year we supported debate on a wide variety of topics including practical advice on how to submit a RMP under the assessment process, participating in the PUR process, maintaining the profile of records management within an authority and discussion on the Keeper's Model Plan. We promoted events and guidance from others, such as the Information and Records Management Society, British Standards Institute, Scottish Council on Archives and the Archives and Records Association. We also provided links to talks that we gave and which remained accessible online.

## COVID-19 Survey

Importantly, our Knowledge Hub space allowed us to engage with colleagues and gain insight into their collective experience of working through the pandemic. We were keen to understand their experience and the implications of this for records and information management in Scotland in order to inform how we might help and support the sector, but also to identify opportunities. We therefore developed and published a survey in the spring of 2020 to capture the initial impact of the disruption and we asked our Knowledge Hub forum to participate in this. The response from colleagues was immediate and encouraging, 71 responses, representing 41% of our stakeholder community, were received.

The survey revealed there had been disruption due to the pandemic and that many had experienced considerable change.

Twenty percent of respondents recorded that adjustments had been made to their roles and responsibilities in order to support the delivery of key services within their organisations. Alongside the impact of caring responsibilities, staff isolation and the communication limitations at that time, this led to a reduction in capacity across the community. In some cases it was clear that events were moving at pace and colleagues were managing uncertainty and were concerned for their roles.

It was also apparent from the responses received that colleagues were delivering new services in new ways with new technology. The information documenting actions over the period of the pandemic will be vital for societal understanding. Therefore, in August 2020 in partnership with the Scottish Council on Archives, we delivered a webinar, *Documenting COVID: Capturing History as it Happens*, to explore the challenges and opportunities around capturing and documenting our collective response to the situation through our management and selection of records of enduring value.



Preserving the past | Recording the present | Informing the future



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We conducted a further survey in autumn 2020 to assess how the position had changed. This survey attracted 55 responses, fewer than the spring survey, but still one third of the PRSA stakeholder community and a representative sample. The largest group of respondents were from the local authority and the health and social care sectors. The report on both surveys can be found at Annex 2 but the issues of most significance are highlighted here:

- **Reductions in Records Management resources and substantial changes to roles and responsibilities.** The pandemic put a squeeze on the limited records management resource across the public sector. Diversification of job responsibilities, pandemic response and a dilution of focus on records management activities were reported.
- **Widespread cessation of records and information management development work.** The impact of reprioritisation across the Scottish public sector reduced the resource available to support planned records management development activities.
- **Good records management and business continuity were key to remote working.** Agile, robust record keeping was demonstrably critical to the success of remote working arrangements and supporting a swift public sector response to the pandemic. Respondents reported the increased importance of records management to the efficient public sector response: reported as 58% importance in April 2020 which climbed to 67% importance by October 2020.
- **A swift move to digital record keeping.** Stakeholders recorded how they had moved away from hybrid systems and paper records to embrace digital solutions. This was a welcome development, but a significant number of concerns were raised by respondents as to the lack of control, infrastructure, planning and management, which was sacrificed for the rollout speed necessitated to deal with the sudden impact of the pandemic.

The PRSA team remains committed to working with stakeholders to monitor the short-, medium- and long-term impact of the pandemic on the public sector record keeping and learn lessons.

I am pleased to report that the PRSA team has been invited to take part in ongoing discussions directly with Microsoft through a new Customer Advisory Board (CAB).

- **The pandemic created new functions and new public records which require management.** Respondents noted their authorities were undertaking new activities as a result of COVID-19 and as a by-product, were creating new records. They were aware of living through a period of emerging history and reported their promotion of the importance of records management in securing COVID-19 records of enduring value.

The survey data will be used to collaborate over additional guidance. It will also help us design and implement advocacy for the importance of records management to business agility and to better understand the challenges and opportunities presented by the transition to Microsoft 365 being made by increasing numbers of Scottish public authorities.

## Microsoft Customer Advisory Board

The unexpected disruption of the worldwide COVID-19 pandemic in 2020 has hastened the transition, not only to digital solutions, but also those that are remote or cloud-based. This has been particularly noticeable in the adoption of Microsoft 365 across many bodies. For some authorities this was a natural evolution from an already existing on-premise SharePoint solution, but for others it represented a major change in the way their public records are managed.

It is important therefore that my PRSA assessment team clearly understands the record management implications of an authority adopting such approaches. To this end they have engaged with colleagues both in the Scottish public sector and further afield to become familiar with how these solutions are being adopted and used.

This board provides the records management community with a direct relationship with the Microsoft 365 development and leadership teams. This will allow us to engage and influence the future direction of the platform's capabilities. It is expected that this advisory board will also provide the opportunity to address issues identified and to ensure ongoing improvement to records management capabilities to Microsoft 365's capabilities in future.

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The PRSA team will continue to support the CAB's work to ensure that Microsoft 365 sees tangibly improved records and information management capabilities as a direct result of the newly established advisory relationship.

The Board brings together many of the world's national archives and regulatory bodies with some of the leading experts in records management in Microsoft 365. As well as the NRS, the CAB includes representatives from:

- The National Archives (UK)
- The National Archives and Records Administration (US)
- Library and Archives Canada
- Norwegian National Archives
- Public Record Office, Victoria
- State Records of South Australia
- National Archives of New Zealand
- National Archives of Finland
- National Archives of Denmark
- National Archives of Spain
- National Archives of Switzerland
- National Archives of Sweden
- The EU Commission

Issues already under discussion by the CAB, from its inception in late 2020, include Microsoft 365 compliance with regard to record retention and deletion and long-term preservation. These issues are particularly of interest as they speak directly to compliance with the Act.

## Rights in Records initiatives

Last year we reported on our engagement with the “Access to Records” initiatives involving colleagues from the information and records, archives, social work, academic and child care sectors. Much of this work was impacted by the pandemic, but we remain involved and contributed to events and discussions. In March 2020 we met with the organiser of the Global Access to Records & Rights workshop, scheduled for April 2021, about our participation on the issue of ownership of records and the management of records created by third party providers under contract to a named public authority.

We continued to support the work of colleagues developing the Scottish Government’s Financial Redress Scheme for survivors of in-care abuse and the Advance Payment Scheme, designed specifically to help those who were abused as a child in care in Scotland before December 2004 and who have a terminal illness or are age 68 or over. In particular we engaged closely with colleagues over the guidance developed to help those applying to the scheme to find and access the records necessary to support their application.

We also continued to contribute to the “Back to the Future: Archiving Residential Children’s Homes (ARCH) in Scotland and Germany” project, which seeks to assist current residents of care trace their records and develop an archive of their care experience. ARCH was successful in attracting funding from the Arts and Humanities Research Project and the Deutsche Forschungsgemeinschaft in November 2020 for its planned programme of work. It began to lay the foundations for its work in the spring of 2021. It will address issues relating to the creation and preservation of personal and institutional records of children in care. It brings together a multi-disciplinary team of archivists and academics in information technology, social work, language and communication, and social pedagogy. The team incorporates partner agencies providing residential care in Scotland and Germany. Additional archival support will be provided by National Records of Scotland, University of Stirling Archives, and the Landesarchiv Berlin.

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The project follows a long period of examination and reflection centred around the extent and quality of record-keeping relating to the care of children in Scotland. This began with the Shaw Report in 2007, which led to the Public Records (Scotland) Act 2011 and established new statutory standards for the proper management of public records.

This is an exciting and innovative project aimed at better informing the creation, management and preservation of records of vulnerable young people in Scotland's care sector. We will continue to support this initiative by contributing archival and records management expertise. We will present a joint paper on this project to the International Council on Archives Section on University and Research institution Archives annual conference in the summer of 2021.

## Conferences and wider talks

COVID-19 restrictions resulted in a significant reduction in conferences and physical gatherings this year.

We were, however, able to exploit online technology in January 2021 to allow us to deliver our annual lecture on the Act to postgraduate students of Glasgow University's Information Management and Preservation course. Our paper addressed the Act in the context of the course module on records management theory, professional principles, compliance and regulatory requirements, for the proper creation, management and disposal of records.

## Section 5

### Reflections on progress and looking forward



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Given the circumstances under which we have all been working this year with changed priorities and new and challenging demands, it is remarkable, and hugely encouraging, to know that authorities remain concerned to achieve and maintain compliance with their statutory obligations under the Act.

In contrast to my previous report this has been a year shaped by the global pandemic and a shift in many authorities and within NRS to new record keeping tasks, remote working and greater use of digital collaboration and records management tools. Despite these unprecedented changes I am delighted to report that we continued to record sustained progress across the sector this year. We continued to issue invitations under the Act, we assessed and agreed formal RMPs and our voluntary Progress Update Review (PUR) mechanism remained in place.

The implementation programme has benefited greatly from meaningful and open engagement with stakeholders. Working together to understand the challenges and co-produce guidance has been a hallmark of the implementation process.

In addition to running our programmes of individual and group engagement with public authorities and our involvement in a range of events using technology, these changes have also enabled us to reach out to colleagues beyond the Scottish public sector and with those across the UK and internationally. These changes have also enabled greater collaboration and communication with a broadening stakeholder community. We will continue to employ these tools to engage with all our stakeholders, and records professionals from other jurisdictions, to better inform our processes and ensure they remain responsive and reflective.

Over recent years we have grown the PRSA Knowledge Hub forum, which provides a discussion space where colleagues can share learning and seek advice. This coming year we will continue to increase our use of this platform to encourage debate and networking opportunities for our colleagues.

We will also 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 continue to grow our contribution to the issue on rights in records, particularly in relation to the records of the most vulnerable in our society.

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Over the coming year we will use such engagement to facilitate debate and learning on subjects important to the community, such as Microsoft 365, archiving procedures in the digital age and third party compliance under the Act. These will be important topics of debate as we emerge from the pandemic.

Since assessments began we have agreed many plans with authorities on an improvement basis. It is therefore vital that we monitor these agreed plans to encourage continuous improvement and measure progress under the Act. Alongside the PUR process, the Keeper can, and does, also invite some authorities to resubmit their plan after a period of five years. Additionally, if we receive information of non-compliance the Keeper can, return to an authority before that time has elapsed. All these routes ensure that we can check in with stakeholders regularly to monitor their commitment to agreed improvement plans.

The make-up of the Scottish public sector is ever changing with new authorities coming into existence and with amalgamation or changes in purpose in others. We continue to review and ensure that authorities are appropriately covered by the legislation. In many cases this happens as part of the founding legislation for the authority but in other cases changes are required to the schedule listing those authorities covered by the Act.

There is no doubt the past 12 months have been transformational for the record keeping community in the Scottish public sector. Future working models look markedly different to pre-pandemic arrangements, and some of the changes that have taken place will undoubtedly be here to stay as we begin to look to a post pandemic future. The PRSA team will continue to engage with the record keeping community to monitor and understand the challenges and opportunities we all face as a consequence of this health crisis.

We started our sector engagement early, launching our first survey with stakeholders to learn about the challenges brought about by COVID-19 in the spring of 2020. We could not, at that time, have anticipated the duration and depth of disruption we would experience under the pandemic. The survey revealed challenges around the creation of records, their management and archiving. Our follow-up 2020 autumn survey confirmed that colleagues increasingly understood the nature of the restrictions they had to work under and were adapting to better manage records in this environment. They also understood the historical importance of the period and the health crisis we are living through and were particularly concerned that the

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It was clear that colleagues grasped the importance of capturing Scotland's national response to the global pandemic so that the public sector response remains auditable and transparent and future generations are presented with a full account of government actions taken.

COVID-19 record survived. They were assisted in this by proactive NRS engagement and updated guidance.

Future topics of discussion include skills and resourcing within the records and archives profession, digital preservation, and authority and control in record keeping environments. We also want to engage with authorities to learn more about the impact the pandemic is having on digital transformation and how this is reflected in RMPs.

It is clear this experience also offers us an opportunity to raise the profile of records and information management. In fact, 54% of colleagues who participated in our first survey felt that the post pandemic world offered this opportunity. Good record keeping and robust business continuity planning has proven to be vital in supporting delivery during the pandemic.

The Scottish public sector is particularly well placed to meet the information challenges of COVID-19 head on. The progress we have been able to make as a profession under PRSA is key to the future. The collaboration that over the past ten years has become the trademark in the sector provides us with a healthy foundation from which to take advantage of new ways of working. We will ensure that we remain committed, whatever the challenges, to protecting the rights of Scotland's citizens by safeguarding the records created on their behalf.



Paul Lowe  
December 2021

# 06

## Section 6

### Annex One: List of Records Management Plans and Progress Update Reviews agreed 2020-2021

#### Records management plans agreed, 2020-2021

Authority	Date of Agreement	Sector
Falkirk Integration Joint Board	03-Apr-20	Health and Social Care
Orkney Council	05-Jul-20	Local Authority
Orkney Licensing Board	05-Jul-20	Local Authority
Inverclyde Integration Joint Board	06-Aug-20	Health and Social Care
Social Security Scotland	23-Sep-20	Health and Social Care
Shetland Islands Integration Joint Board	23-Sep-20	Health and Social Care
Keeper of the Records of Scotland	13-Jan-21	Governance
Registrar General for Births Deaths and Marriages in Scotland	13-Jan-21	Governance
Orkney Integration Joint Board	05-Feb-21	Health and Social Care
Scottish Legal Aid Board	05-Feb-21	Justice
North Lanarkshire Integration Joint Board	11-Feb-21	Health and Social Care
Glasgow Integration Joint Board	19-Mar-21	Health and Social Care

## PUR Final Reports sent to authorities, 2020-2021

Authority	Final Report sent to CEO/SO	Sector
The National Library of Scotland	03-Apr-20	Culture, Leisure and Science
Scottish Ambulance Service	03-Apr-20	Health and Social Care
Scottish Borders Council	03-Apr-20	Local Authority
Scottish Borders Licensing Board	03-Apr-20	Local Authority
NHS Highland	03-Apr-20	Health and Social Care
Water Industry Commission for Scotland	06-Apr-20	Economic Development
Historic Environment Scotland	24-Apr-20	Culture, Leisure and Science
Healthcare Improvement Scotland	04-May-20	Health and Social Care
Scottish Health Council	04-May-20	Health and Social Care
NHS Forth Valley	06-May-20	Health and Social Care
Food Standards Scotland	14-May-20	Governance
Aberdeen City Council	22-May-20	Local Authority
Lothian Valuation Joint Board	04-Jun-20	Local Authority
Scottish Natural Heritage	04-Jun-20	Culture, Leisure and Science
Renfrewshire Valuation Joint Board	04-Jun-20	Local Authority
Bòrd na Gàidhlig	08-Jun-20	Culture, Leisure and Science
NHS Tayside	12-Jun-20	Health and Social Care
Scottish Legal Complaints Commission	22-Jun-20	Governance
NHS Lanarkshire	22-Jun-20	Health and Social Care
Scottish Futures Trust	04-Jul-20	Economic Development
NHS Ayrshire and Arran	02-Aug-20	Health and Social Care
Crown Estate Scotland	06-Aug-20	Economic Development
Board of Trustees for the National Galleries of Scotland	31-Aug-20	Culture, Leisure and Science
Scottish Water	31-Aug-20	Economic Development
Scottish Public Services Ombudsman	05-Sep-20	Governance
Community Justice Scotland	30-Sep-20	Justice
National Waiting Times Centre Board	05-Oct-20	Health and Social Care
Scottish Commission for Public Audit	22-Oct-20	Governance
Scottish Parliament	22-Oct-20	Governance
Scottish Parliament Corporate Body	22-Oct-20	Governance

Authority	Final Report sent to CEO/SO	Sector
Scottish Enterprise	03-Dec-20	Economic Development
Dumfries and Galloway Council	07-Jan-21	Local Authority
Dumfries and Galloway Licensing Board	07-Jan-21	Local Authority
Swestrans	07-Jan-21	Transport
Angus Council	11-Jan-21	Local Authority
Angus Licensing Board	11-Jan-21	Local Authority
Historic Environment Scotland	11-Jan-21	Culture, Leisure and Science
Caledonian Maritime Assets Ltd	11-Jan-21	Transport
Midlothian Council	11-Jan-21	Local Authority
Midlothian Council Licensing Board	11-Jan-21	Local Authority
David McBrayne Ltd	22-Jan-21	Transport
North Lanarkshire Council	02-Feb-21	Local Authority
North Lanarkshire Licensing Board	02-Feb-21	Local Authority
Scottish Canals	10-Feb-21	Transport
Scottish Qualifications Authority	04-Mar-21	Governance
Risk Management Authority	04-Mar-21	Governance
Standards Commission for Scotland	15-Mar-21	Governance
Lanarkshire Valuation Joint Board	15-Mar-21	Local Authority
West Dunbartonshire Council	16-Mar-21	Local Authority
West Dunbartonshire Licensing Board	16-Mar-21	Local Authority
Skills Development Scotland Co. Ltd.	17-Mar-21	Economic Development
Renfrewshire Council	18-Mar-21	Local Authority
Renfrewshire Licensing Board	18-Mar-21	Local Authority
Independent Living Fund Scotland	30-Mar-21	Health and Social Care

# 07

## Section 7

### Annex Two: The impact of the COVID-19 on record keeping in the Scottish public sector

The impact of the COVID-19 pandemic has brought about significant change in workplaces across the world, with the move to remote, home working for many and growing changes to how records are created, managed and retained. The future path of the pandemic remains unclear, although it is recognised that COVID-19 will likely remain a public health and societal challenge for some time to come.

During the spring and autumn of 2020, we conducted two pulse surveys, to measure and understand the impact of the pandemic on the record keeping community in Scotland. We further explored these themes in a stakeholder discussion webinar event in the summer of 2020.<sup>5</sup>

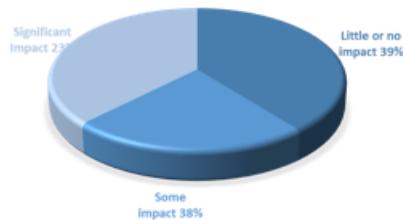
#### Understanding the impact

One of the key aims of the surveys was to establish what, if any, impact the pandemic had in relation to record keeping practices and professionals in authorities. This engagement activity indicated a number of key messages:-

#### Reduction in records management resource and substantial changes to roles and responsibilities

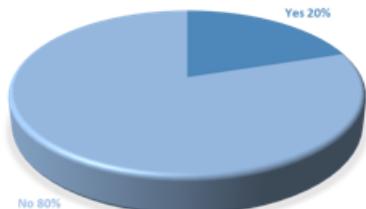
In Scotland, as across the UK, much of the public sector rapidly pivoted to reprioritise and focus resources on tackling the front line COVID-19 response.

<sup>5</sup> The surveys were sent directly to the PRSA key contacts, the named individuals with operational responsibility for the implementation of the Records Management Plan in a named Scottish Public Authority, covered by Schedule 1 of the Public Records (Scotland) Act 2011. Additionally, members of the PRSA Knowledge Hub forum, which includes independent Records Management Consultants, were invited to participate. NRS Impact of COVID-19 on record keeping in Scotland Survey Spring, April 2020, 71 responses; NRS Impact of COVID-19 on record keeping in Scotland Survey Autumn, October 2020, 55 responses. NRS and The Scottish Council on Archives (SCA) hosted a webinar to further explore the issues raised in the spring survey around capturing records of enduring value, and the data from this event has also been used throughout this article. Documenting COVID-19 - Capturing History as it Happens Webinar, 24 August 2020. 46 people attended the Webinar.



What has been the impact on staff in your team and wider organisation, such as staff redeployment, furloughing, recruitment freeze or lack of ability to work from home?

Has the scope of your role and responsibilities changed as a result of the impact of COVID-19 on your organisation?

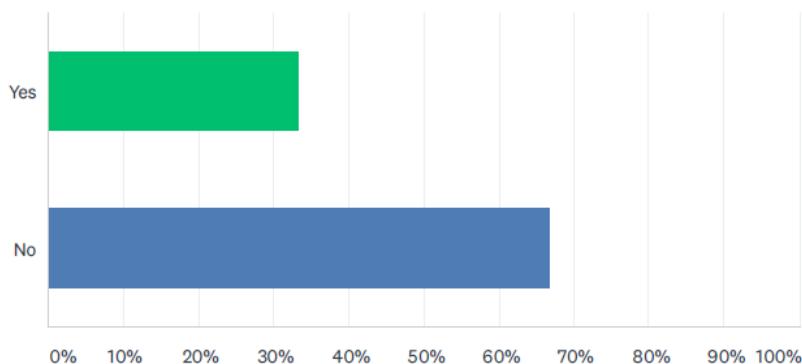


The spring survey reported that 20% of respondents had experienced adjustments to their roles and responsibilities, in order to support the delivery of key services within their organisations. Alongside the impact of caring responsibilities, staff isolation and initial communication limitations, this led to a reduction in capacity reported across the community.<sup>6</sup>

By our autumn 2020 survey this figure had significantly increased to 33%: the continued redeployment, furlough and recruitment freezes all being factors, along with continued and prolonged adjustments to roles.<sup>7</sup>

### Q8 Has the scope of your role and responsibilities changed as a result of impact COVID-19 on your organisation?

Answered: 48      Skipped: 8



<sup>6</sup> Impact of COVID-19 on record keeping in Scotland Survey: Spring, April 2020: Q8 Has the scope of your role and responsibilities changed as a result of the impact of COVID-19 on your organisation? Yes: 19.67%; No: 80.33%

<sup>7</sup> Impact of COVID-19 on record keeping in Scotland Survey: Autumn, October 2020: Q8 Has the scope of your role and responsibilities changed as a result of the impact of COVID-19 on your organisation? Yes: 33.33%; No: 66.67%

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Although nearly half (39%) of such changes involved additional Information Governance (IG) activities, such as IG policy development to support remote working and increased Data Protection Impact Assessments, over half (61%) of these changes were stated to include “non-IG” activities, including staff welfare support; health and safety; logistics and distribution and development of COVID-secure workplaces.

It is clear from both surveys that the pandemic has impacted an already limited records management resource across the Scottish public sector. This carries some risk of a dilution of focus on records management activities if these changes are sustained in the medium-to-long term.

## A continued widespread cessation of records and information management development work

The impact of reprioritisation, to support the front line COVID-19 response, meant that 81% of respondents noted moderate to significant changes to planned records management development initiatives, or the cessation of continuous improvement programmes.<sup>8</sup> Narrative responses identified some concerns expressed by respondents about the scale of development and improvement activity that could be progressed as a result.

## Increased importance of records management visibility in organisations

Record keeping gained prominence and visibility within authorities, especially in the spring of 2020. It was reported that remote working demonstrated the need for accessible and reliable information and that robust records management arrangements supported these requirements. Records management business continuity planning, which the Keeper has been advocating under the Act, was particularly important in this respect. 95% of respondents considered their plans successfully supported dispersed working.<sup>9</sup>

<sup>8</sup> Impact of COVID-19 on record keeping in Scotland Survey Autumn, October 2020: narrative responses Q7: What has been the impact of the last six months working arrangements on your planned programme of work? 19% noted no significant change, 81% reported moderate or significant changes which included putting plans on hold to abandoning work plans entirely.

<sup>9</sup> Impact of COVID-19 on record keeping in Scotland Survey Autumn, October 2020: narrative responses Q14: How have your business continuity arrangements withstood the impact of COVID-19

## The importance of accessing reliable records to support business agility during a time of adversity and change

Both surveys asked colleagues to consider how important they felt records management was in supporting the public sector response to the COVID-19 crisis. In the spring records management was seen as being moderately important, but by the autumn responses indicated they considered it was central to the sector's response.<sup>10</sup> Although it is recognised that the crisis is first and foremost a health emergency, there is a clear indication that information management played a significant role in helping authorities respond robustly. Ready access to reliable, digital information has been fundamental to supporting business agility during this period of crisis.<sup>11</sup>

## Challenges and opportunities

Beyond understanding the immediate transformational impact on the sector, the surveys and webinar also captured a number of opportunities and challenges for the community, arising from the changes brought about by the pandemic.<sup>12</sup> Some 54% of respondents felt the crisis offered an opportunity to raise the profile of the sector. Good record keeping had been proven to be vital to supporting remote working, and significant numbers felt the impact of remote working had accelerated the adoption of digital record keeping systems and improved information governance structures.

<sup>10</sup> Responses to Q9: How important has the records management service you provide been to supporting disrupted working arrangements and business continuity? Impact of COVID-19 on record keeping in Scotland Survey Spring, April 2020 (58/100 score) and Impact of COVID-19 on record keeping in Scotland Survey Autumn, October 2020(67/100 score)

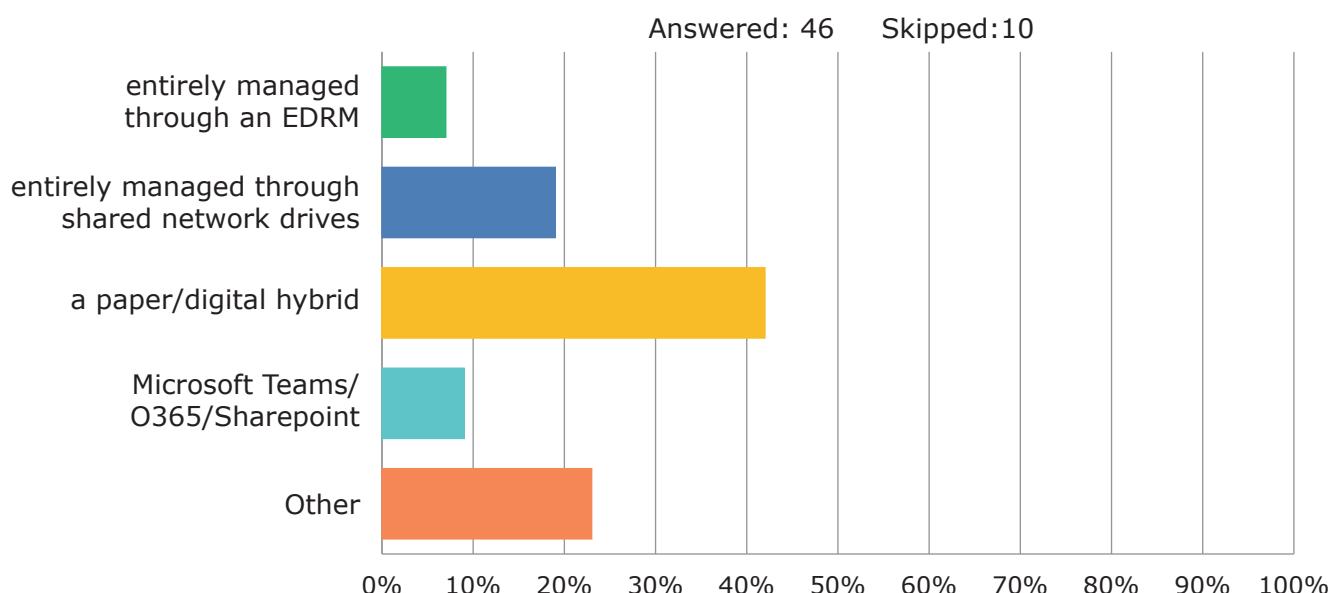
<sup>11</sup> Expanded responses to Q9: How important has the records management service you provide been to supporting disrupted working arrangements and business continuity? included anecdotal narrative accounts of the important role of record keeping in addressing the challenges of the pandemic, "If we did not have close control of our records, stored appropriately electronically, we would not have been able to move wholesale to remote working so quickly and with little interruption". Impact of COVID-19 on record keeping in Scotland Survey Autumn, October 2020

<sup>12</sup> Impact of COVID-19 on record keeping in Scotland Survey Spring, April 2020: Q11: Do you view the impact of COVID-19 arrangements on your records management as a challenge, threat, opportunity or all of above? Challenge: 25%; Opportunity: 32%; Threat 5%; 38%

## A swift move to digital record keeping

The near overnight transformation of the public sector record keeping landscape brought about accelerated change in the roll-out of digital record keeping practice across the board.

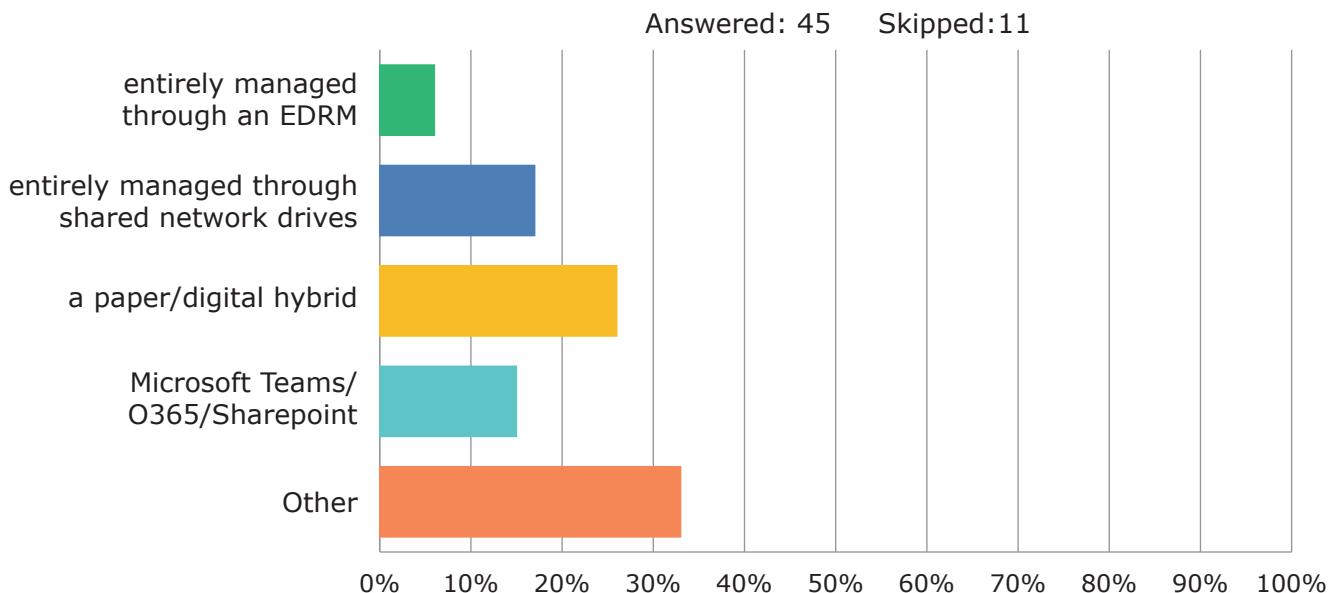
### Q13 How would you describe the records management in your organisation prior to March 2020?



Prior to March 2020, 48% of services who participated in the survey operated paper or hybrid record keeping arrangements with aspirations to embrace digital record keeping.<sup>13</sup> The need to quickly support digital service delivery and working from home accelerated the importance and prioritisation of such changes.

<sup>13</sup> Impact of COVID on record keeping in Scotland Survey Spring, April 2020: Q12: How would you describe records management in your organisation? A paper/digital hybrid: 48%; ERDM 7%; Shared network drives 16%; Other 28%

## Q14 How would you describe the records management in your organisation in October 2020?



By the autumn survey, 50% of respondents had changed their records management arrangements as a result of the pandemic. Notably, by this time, we see a significant move away from hybrid systems and paper records, to embrace fully digital solutions and web-based service delivery models.<sup>14</sup> Some 41% of respondents told us that the method of public records creation had also changed, most significantly with the roll-out of products such as Microsoft 365, SharePoint, Teams and OneDrive.<sup>15</sup> The move to born-digital record creation and management had been essential to supporting working from home, and this is a welcome development for the sector.

However, this beneficial progression also came with some genuine concerns, which will prove challenging over the immediate medium and longer term. Whilst the transition to digital working is welcomed, there were a significant number of respondents who highlighted that there was variable and sometimes no involvement of records management practitioners in relation to the planning and management of such changes.<sup>16</sup>

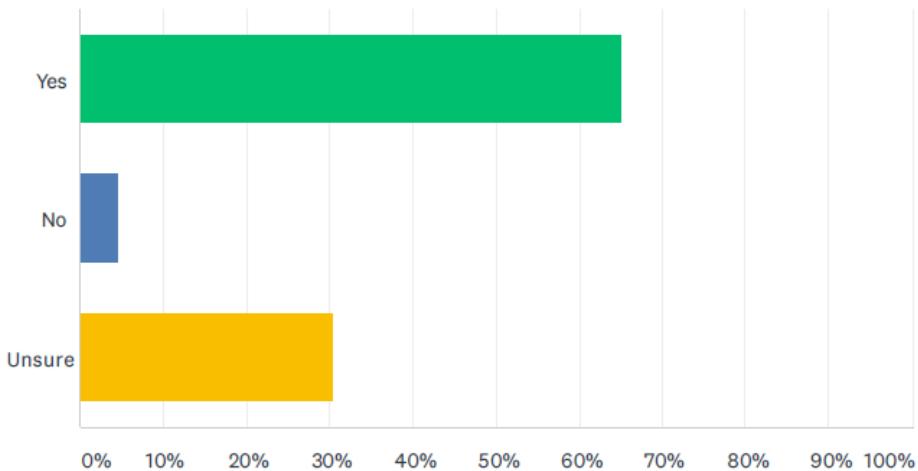
<sup>14</sup> Impact of COVID-19 on record keeping in Scotland Survey Autumn, October 2020: Q14: How would you describe records management in your organisation? A paper/digital hybrid: 26%; ERDM 7%; Shared network drives 18%; MS Teams/O365/Sharepoint 16%; Other 33%

<sup>15</sup> Impact of COVID-19 on record keeping in Scotland Survey Autumn, October 2020: Q12: Has your organisation's record creation changed as a result of working from home: Yes 41% No 59%

<sup>16</sup> Impact of COVID-19 on record keeping in Scotland Survey Autumn, October 2020: Q12: narrative response

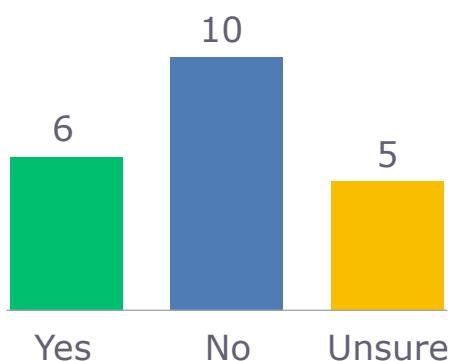
## Q18 Do you know where your organisation's new Covid 19 records are?

Answered: 43 Skipped: 13



A concern expressed by a number of respondents was the risk of a proliferation of records created outside the authority's standard record keeping systems. Just over one third of respondents, in the autumn survey, confirmed they were not always certain that they could locate information in new digital systems rolled out.<sup>17</sup> It will be important that in continuing to evidence their approaches through Records Management Plans and PUR processes that authorities can sufficiently evidence that they have robust arrangements in place to manage information held in new technology assets.

## If a Covid record is born digital do you have capacity to preserve this?<sup>18</sup>



<sup>17</sup> Impact of COVID-19 on record keeping in Scotland Survey Autumn, October 2020: Q18: Do you know where your organisation's new COVID-19 records are? Yes: 65%; No 5%; Unsure 30%

<sup>18</sup> Responses captured during Q&A session at Documenting COVID-19 - Capturing History as it Happens Webinar, 24 August 2020

## New public functions and new public records which require proper management

Some 38% of survey respondents advised that their organisation was undertaking new activities as a result of COVID-19 and as a by-product, creating new record types not currently covered by business classification schemes, or retention and disposal schedules.<sup>19</sup> Interestingly, 25% reported the use of new technologies and media for the creation and management of records.<sup>20</sup> Many Scottish public authorities moved their face-to-face service delivery online, with the creation of new and broader web sites now delivering more and more public functions.

## Securing records of enduring value

As we lived through emerging history, there was concern to ensure the capture of public records and historical documentation of Scotland's COVID-19 response. In the spring survey 100% of respondents had not formally considered or adapted their retention and disposal schedules to ensure the capture and preservation of COVID-19 records of significant importance were captured for archival purposes.<sup>21</sup> NRS responded to this by engaging directly with stakeholders. In addition they updated routine depositor advice and guidance to include this new and important class of records.

Encouragingly the autumn survey recorded nearly two-thirds of respondents were reviewing, or preparing to review, their existing retention policies to capture this important emerging history.<sup>22</sup> Additionally, 57% had been actively collecting material relating to their COVID-19 response.<sup>23</sup> Notably, NHS bodies in Scotland were acting collectively to harness their response to a global health crisis and ensure records relating to COVID-19 were identified and preserved.

19 Impact of COVID-19 on record keeping in Scotland Survey Autumn, October 2020 Q17: As a result of COVID-19 has your organisation delivered new functions and created new types of records? Narrative responses included details of new functions and records, including: track and trace documentation; COVID-19 testing records; new HR records; disbursement of business support grants; Crisis support services; new boards and committees in the organisation; humanitarian response

20 Impact of COVID-19 on record keeping in Scotland Survey Autumn, October 2020, Q19: What new media are you using to create these records? Narrative responses included: WhatsApp; Trello; Streas; Nearme; Kaizala; YouTube

21 Impact of COVID-19 on record keeping in Scotland Survey Spring, April 2020 Q15: As we are living through emerging history, what changes if any have you made to your retention and disposal plans?

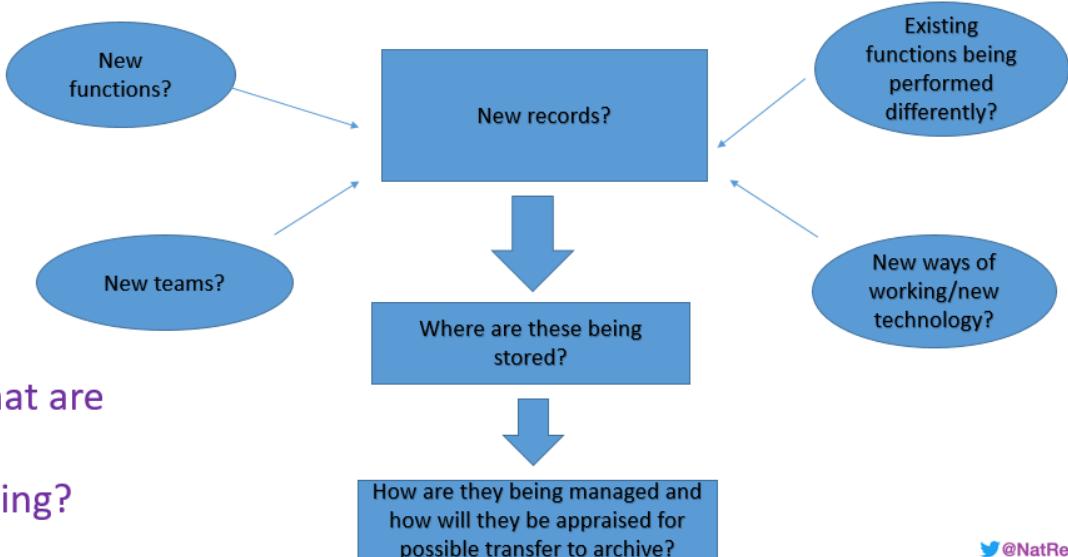
22 Impact of COVID-19 on record keeping in Scotland Survey Autumn, October 2020 Q20: As we are living through emerging history, what changes if any have you made to your retention and disposal plans?

23 Impact of COVID-19 on record keeping in Scotland Survey Autumn, October 2020 Q24: Has your organisation been actively collecting material relating to COVID-19? Yes: 57% No: 43%



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## What are we asking?



@NatRecordsScot

In 2020 NRS updated our Government Records Collecting Policy to explicitly include COVID-19 records, to ensure that Scotland's response to the pandemic is preserved for future generations. We are now drawing on this work in our advice to broader PRSA stakeholders.



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The NRS Web Continuity Service (WCS) enables NRS to capture, preserve and make available archival snapshots of our depositors' (clients') websites in the NRS Web Archive.<sup>24</sup> The Keeper recognises that public authority websites are public records and therefore must be a key part of his statutory collecting duty.<sup>25</sup> Collecting these important records not only supports public access to historical official information, it creates cost savings for clients. This important service gained increased significance as a consequence of COVID-19, as public sector websites recorded authorities' responses to the global pandemic. Launched in 2017, the WCS has so far captured archival snapshots of 227 websites, belonging to 108 website owners.

Prior to the pandemic the Keeper had collected 230 snapshots per annum; through the efforts of the COVID-19 web archive team, he added over 3,000 new snapshots to the web archive in the last 12 months, and this collecting effort continues.

As public bodies increasingly utilised social media to communicate directly with the citizen, NRS also began social media archiving: a watershed for NRS. Since October 2020, the Keeper has collected COVID-19-related content, from 10 official Twitter accounts, including Scottish Government, Public Health Scotland, and Scotland's Supreme Courts. He has been able to precisely and safely capture this content via Social Feed Manager,<sup>26</sup> which is provided to us as a service by the Internet Archive.

Through these efforts he has secured and collated new digital historical assets for Scotland, which will be used by future generations to assess, scrutinise, and understand this extraordinary period in our nation's history.

In 2021, the Keeper's focus remains on continued engagement with depositors. As lockdown eases, he aims to ensure that the records collected for permanent preservation reflect the continuing changes to life in Scotland. The learning that is gained in this exercise will be shared with others across the Scottish public sector.

<sup>24</sup> [NRS Web Archive](#)

<sup>25</sup> [What's in the NRS Web Archive](#) We also offer web continuity redirection to clients - the opportunity to "connect" their live website with the Web Archive, in order to mitigate "404" broken links. We are supported in this endeavour by our contracted third party supplier, [Internet Archive](#)

<sup>26</sup> [Social Feed Manager](#)

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