The Public Records (Scotland) Act 2011

Scottish Qualifications Authority

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

4th March 2021

Contents

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 the 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.

Progress Update Review (PUR) Template: Scottish Qualifications Authority

Element	Status of elements under agreed Plan 13AUG15	Progress status 06FEB19	Progress status 17JAN20	Progress status 04MAR21	Keeper's Report Comments on Authority's Plan 13AUG15	Self-assessment Update 08NOV19	Progress Review Comment 17JAN20	Self-assessment Update as submitted by the Authority since 17JAN20	Progress Review Comment 04MAR21
1. Senior Officer	G	G	G	G	Update required on any change.	The Senior Officer with responsibility for Records Management and the RMP within SQA is currently Director of Corporate Services, Maidie Cahill. As of January 2020 Corporate Services will become part of a wider Finance and Corporate Services directorate with a new Director, Mike Baxter, taking up post. It is anticipated that as part of this role he will take over responsibility for Records Management and the RMP. Once confirmed SQA will update the Keeper. Please also note that Fiona Robertson took up post as SQA's new CEO in July 2019.	The Assessment Team thanks the Scottish Qualifications Authority (SQA) for this update. If Mr Baxter does indeed become the senior responsible officer for records management in the authority, the Keeper should be alerted to this change as soon as practicable rather than waiting for next year's PUR prompt. However, currently SQA has an identified individual in this role (Ms. Cahill) so the element remains 'green'.	The Senior Officer with responsibility for Records Management and the RMP within SQA is Director of Finance and Corporate Services, Mike Baxter.	The Keeper's Assessment Team thanks the Scottish Qualifications Authority for this update which has been noted.
2. Records Manager	G	G	G	G	Update required on any change.	No change.	No immediate action required. Update required on any future change.	No change.	No immediate action required. Update required on any future change.
3. Policy	G	G	G	G	Scottish Qualifications Authority demonstrates a 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.	The annual review of SQA's Records Management Policy was completed in April 2019. The Keeper is provided with an updated policy (Item 1).	In their original submission SQA committed to keep its information governance policy documents under review and the Assessment Team acknowledge that this is being done. They also acknowledge that	The annual review of SQA's Records Management Policy was completed in September. The Keeper is provided with an updated policy (Item 1).	In their original submission SQA committed to keeping their information governance policies and guidance documents under review and the Assessment Team acknowledges that this is being done. The Assessment Team notes that a new Records Management Policy is

							they have received an updated version of the SQA *Records Management Policy*. This is version 5.0. The new version will be kept on file in order that the authority's submission may be kept up-to-date.		available and acknowledges that a copy has been supplied. This is version 6.0. They will store this in order that they may keep the SQA submission up-to-date.
4. Business Classification	A	A	A	A	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 *Improvement Plan* 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. 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 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.	No change. SQA is continuing to review the potential use(s) of the O365 products. In particular, this includes investigating the use of SharePoint for the creation and management of SQA's information and records.	Along with many other Scottish public authorities, SQA is investigating the potential of a SharePoint/Office 365 records management solution. Also, along with other authorities this is not yet operational in the authority and until it is rolled-out and fully functional this element remains at 'amber'. That said, it is noted that SQA are not yet fully committed to using SharePoint/Office 365 as a records management solution and may choose to pursue a different option. The Assessment Team look forward to an update in future PURs.	SQA continues to review the potential use(s) of the O365 products for the creation and management of SQA's information and records. Due to the implications of the continuing situation with Covid and the challenges of delivering a certification, in both 2020 and 2021, this is not currently a priority for SQA. As such there has been no change from SQA's previous update.	The Assessment Team completely understand that SQA has been under considerable pressure as an organisation in 2020. It is no surprise that the development of a new records management solution, informed by a Business Classification Scheme, has been put on hold. **It is noted by the Assessment Team that SQA is considering adopting the O365 solution for its records management structure going forward. This is a major undertaking and will change the way that digital records are managed including records destruction, document tracking (see element 11), record recovery (element 10) and possibly the application of retention (element 5) and archiving procedures (element 7).** Generally a O365 cloud solution is bound to be incremental and take several years to bed-in properly. The Assessment Team remind SQA of the importance of appropriate polices, governance and staff training in making this major project a success. The Assessment Team looks forward to updates in subsequent PURs. This element remains at Amber while this work is ongoing.

5. Retention Schedule	G	G	G	G	Update required on any change.	Updates to SQA's retention schedule continue to be made on an ongoing basis, with a more formal review undertaken annually. This year's formal review is currently underway. However, amendments have been made since SQA's last progress update. The Keeper is provided with an updated copy of SQA's retention schedule (Item 2).	The Assessment Team note that the annual review of the authority's retention provision is underway at the time of this assessment. However, the Assessment Team acknowledge the receipt of an updated *Retention Schedule* (version 4.2). SQA clearly recognise that a retention schedule is a 'living document' subject to change. It should be noted that, in the future, the Keeper is likely to require evidence that the SQA Retention Schedule can be imposed on whichever records management structure the authority implements **(see element 4)**.	A formal review of SQA's retention schedule is undertaken annually with any other updates being made as and when required. The Keeper is provided with an updated copy of SQA's retention schedule (Item 2). SQA notes the process review comment on our previous update submission regarding the future requirement to provide evidence that SQA's retention schedule can be applied to whichever records management structure is implemented. At this time SQA's retention schedule is applied manually to the network drive folders used to store information and records. However, to ensure that application of the retention schedule is considered in the development or procurement of any new system, this has been included in SQA's non-functional requirements and defined as a necessary capability of any new system.	Thank you for this update. There is a recognition that a retention schedule is a 'living document' and will be subject to continual minor change year on year. The Assessment Team notes that a new Records Retention Schedule is available and acknowledges that a copy has been supplied. This is version 5.1. They will store this in order that they may keep the SQA submission up-to-date. See comments under element 4 regarding retention and O365.
6. Destruction Arrangements	G	G	G	G	Update required on any change.	Further amendments have been made to SQA's guidance and destruction forms, as well as the Retention and Disposal Policy, which supports this. The Keeper is provided with copies of the updated guidance, forms and policy (Items 3, 4 and 5).	The Assessment Team acknowledge the receipt of their latest *Retention and Disposal Policy* (v5.0), sample *Destruction Request Form* and *Disposal Procedures* v2.0. These will be kept on file in order that the authority's submission may be kept up-to-date.	SQA's Retention and Disposal policy is subject to annual review. The Keeper is provided with an updated policy (item 3). No further amendments have been made to the associated guidance or destruction forms since SQA's last update.	The Assessment Team notes that a new Retention and Disposal Policy is available and acknowledges that a copy has been supplied. This is version 6.0. As above, this will be stored in order that they may keep the SQA submission up-to-date.
7. Archiving and Transfer	G	G	G	G	Update required on any change.	No change.	No immediate action required. Update required on any future change.	No change.	No immediate action required. Update required on any future change.
8. Information Security	G	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	A full review of SQA's Security Incident Management Procedures was completed at the beginning of 2019. This resulted in improved guidance and a	The Assessment Team acknowledge the receipt of their latest *Security Incident Report* pro-forma and *Security Incident Management Procedures* (March 2019). These will be	A review and update of SQA's Information Security, Access Control and IT Acceptable Use policies was completed in September. The Keeper is provided with an updated copy of each of these policies (items 4, 5 and 6).	This is further evidence that SQA are appropriately keeping their information governance policies and guidance under review. This is commendable.

					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.	refreshed reporting form. The Keeper is provided with an updated copy of the reporting form and guidance (Items 6 and 7). In March 2019, the Information Governance and IT Security teams held information security open days at both SQA sites. These events provided staff with the opportunity to take part in a range of interactive activities aimed at increasing their awareness of information security and data protection in both their personal and professional lives. The open days were well attended by staff on both sites and that good feedback was received from staff on the content and interactive approach.	kept on file in order that the authority's submission may be kept up-to-date. The Assessment Team notes the training programme that SQA has been undertaking this year. The clear and continual engagement with record creators is vital for the success of the implementation of a records management plan. It is encouraging that the feedback from those undertaking the training was generally positive.	Two online training modules on information security (levels 1 and 2) have now been developed. These modules provide the user with an introduction to information security as well as a more in-depth understanding of two areas in particular - password security and phishing. The modules are included as part of SQA's induction programme and must be completed by all new members of staff within 4 weeks of their start date. The same training will be rolled out to the remainder of staff by Jan 2021. The Keeper has been provided with access to the training modules (details of how to access the training are provided in the accompanying email). As part of cyber Scotland week (17-21 Feb) SQA's Information Governance team ran a series of articles and discussions across our intranet and internal communication channels which culminated in an interactive quiz at the end of the week. SQA also has Cyber Essentials certification and is currently working towards Cyber Essentials Plus.	The Assessment Team acknowledges receipt of Information Security Policy v6.0, Access Control Policy v4.0 and IT Acceptable Use Policy v2.0. These will be retained in order that we may keep the SQA submission up-to-date. For training see element 12. Thank you for the update regarding Cyber Essentials + The Assessment Team has been provided with a copy of the current SQA Cyber Essentials certificate.
9. Data Protection	G	G	G	G	Like Element 8, there is a similar commitment from the authority to submit revised documents to the 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.	Following the annual review, updates have been made to SQA's Data Protection Policy. This will be published along with other Information Governance polices later this month. The Keeper is provided with an updated copy (Item 8) Following review amendments have been made to SQA's Data Protection Impact Assessment template	The Assessment Team acknowledge the receipt of their latest Data Protection Policy (v7.0), Data Protection Impact Assessment Form and Data Protection Impact Assessment Guidance (November 2019). These will be kept on file in order that the authority's submission may be kept up-to-date. It is acknowledged that SQA maintain current data protection/privacy	The annual review and update of SQA's Data Protection Policy was completed in September. The Keeper is provided with an updated policy (item 7). An online training module which provides users with an introduction to and understanding of the key concepts and requirements of data protection has now been developed. This module is included as part of SQA's induction programme and must be completed by all new members of staff within 4 weeks of their start date.	Again evidence that SQA are appropriately keeping their information governance policies and guidance under review. This is commendable. The Assessment Team acknowledges receipt of a new version of the authority's Data Protection Policy (Version 7.0). This will be retained in order that we may keep the SQA submission up-to-date. The Assessment Team also notes receipt of Employee Secondee Privacy Statement v2.0 and Privacy

					and the associated guidance. The Keeper is provided with updated copies of the assessment template and associated guidance (Items 9 and 10). SQA's Information Governance Manager and Data Protection and Records Manager both successfully completed the BCS GDPR Update to the Practitioner Certificate in Data Protection in July 2019.	advice to their service-users on their website: https://www.sqa.org.uk/sqa/57681.html The Assessment Team note the additional qualifications and training opportunities accessed by the key information governance staff in SQA.	The same training will be rolled out to the remainder of staff by Jan 2021. The Keeper has been provided with access to the training modules (details of how to access the training are provided in the accompanying email). A review of SQA's privacy statements was completed in October. Following this, updates have been made to both the staff privacy statement and that for candidates and other services users, the latter of which is currently being updated on SQA's website. The Keeper is provided with a copy of the staff privacy statement (Item 8) and a word version of the main privacy statement whilst this is being updated (Item 9).	Statement v5.0. They confirm that v5.0 is now publically available: Privacy Statement (English) - SQA For training see element 12.
10. Business Continuity and Vital Records	G	G	G	G	The *Improvement Plan* 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 to be informed when these positions have been created should they have an effect on record recovery procedures.	Since the RMP was agreed, SQA's Business Continuity policy has undergone review on an annual basis. The Keeper is provided with an updated copy (Item 11). An exercise was conducted in April 2019 to validate the effectiveness of SQA's information security continuity controls during an adverse situation. This identified various actions including the need to develop a programme of exercises and to make amendments to SQA's business continuity plans where necessary. These updates have now been made to the plans and a test and exercise group has been established to take forward the programme of exercises.	This is further evidence that policies and procedures are kept under review appropriately. In the case of the Business Continuity Policy there was also a test which appears to have raised pertinent questions about the effectiveness of the procedures. There appears to have been a robust response to these issues and this is to be commended. The Assessment Team looks forward to an update regarding the work of the 'exercise group' especially around the issue of record recovery. The Assessment Team acknowledge the receipt of their latest *Business Continuity Policy* (v5.0). This will be kept on file in order that the authority's submission	SQA's Business Continuity policy continues to undergo an annual review. This year's review is currently underway. The test and exercise group referred to in our last submission is working to develop a programme of exercises. This work is currently in the analysis stage - information of all tests conducted thus far has been gathered and a high-level plan, which includes undertaking desk-top exercises, has been agreed. In addition, a complex exercise will be carried out with a set of priority functions. Risk assessments are currently being completed to determine which functions will be selected. A business continuity and incident management programme of training and awareness is being developed and will be implemented in 2021.	As with many other elements above, SQA clearly keep the review of information governance documents as a priority and this is welcomed. It is particularly important to ensure that business continuity process are regularly tested and it is clear that appropriate testing is being developed. Clearly, in 2020 the business continuity arrangements in the Scottish public sector were severely tested by the Covid-19 pandemic. The 2019 test, reported on in the last PUR, almost certainly helped with the 2020 response.

	G	G	G	G			may be kept up –to-date.		
11. Audit Trail	G	G	G	G	Update required on any change.	A review of SQA's guidance on version control and naming conventions resulted in minor changes. The Keeper is provided with updated copies (Items 12 and 13)	The Assessment Team acknowledge the receipt of their latest *Version Control Guidance* (v4.0) and *File Naming Guidance* (v3.0). These will be kept on file in order that the authority's submission may be kept up –to-date.	SQA's guidance on naming conventions is currently under review with amendments being made to reflect the requirements and differences of naming files for publication on SQA websites. The Keeper will be provided with an updated copy once this is finalised. No changes have been made to SQA's guidance on version control.	Thank you for the update on developments in the SQA Naming Convention document. The Assessment Team would welcome receipt of the new version at the time of the next PUR.
12. Competency Framework	G	G	G	G	Update required on any change.	Online training modules for information governance are currently under development. These will form part of SQA's induction programme and act as refresher training for existing members of staff. Although the modules themselves are not yet available for review the Keeper is provided with a copy of the text that will form the content of the modules (Item 14). In addition to this, the Information Governance site within SQA's intranet is currently being re-developed. This follows review of this section and the information provided, as well as the replacement of SQA's intranet. All guidance and policy documents related to information governance will be made available to staff from this section, as they are currently. The new site will also include FAQs/quick reference guides, highlight key messages and promote internal events. SQA's Information Governance Manager and Data Protection and	The introduction of information governance training at induction is welcome and the Assessment Team acknowledges that the framework for this training has been supplied. They look forward to further updates in subsequent PURs. The creation of a single area of the intranet for information governance information is also to be commended as it is likely to create a stronger business tool for the organisation. The Assessment Team note the additional qualifications and training opportunities accessed by the key information governance staff in SQA.	Development of the online information governance training modules referenced in SQA's last update submission has now been completed. As mentioned above these include training modules on information security (levels 1 and 2) and data protection. All modules are included in SQA's induction programme and must be completed by all new staff within 4 weeks of their start date. The same training will be rolled out to the remainder of staff by Jan 2021. The re-development of Information Governance site within SQA's intranet has also now been completed and the site has been launched. This will continue to be developed and further updates made. Although training and development opportunities have been affected by current circumstances, SQA's Information Governance Manager and Data Protection and Records Manager continue to attend CPD events and undertake relevant training. Both attended an online O365 records management training course in June and the annual PDP data protection conference in October.	The Keeper expects staff creating, or otherwise processing records, to be appropriately trained and supported. There is ample evidence in this PUR that staff training is appropriately considered by SQA. For example training modules on information security and an introduction to and understanding of the key concepts and requirements of data protection have now been developed (see elements 8 and 9). The Assessment Team notes the training roll-out planned for early 2021. The Assessment Team thanks SQA for access to these training modules via SQA's training platform, SQA Academy. It is welcome news that the Information Governance area of the authority's intranet is now operational. As we said in the previous PUR this is liable to create a strong business tool for SQA.

					Records Manager both successfully completed the BCS GDPR Update to the Practitioner Certificate in Data Protection in July 2019. In addition, both regularly attend CPD events such as the ICO's Data Protection conference and the Public Records Scotland Act Conference.				
13. Assessment and Review	G	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 *Records Management Policy* and the *Retention Schedule* 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. The *Improvement Plan* 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.	No change.	No immediate action required. Update required on any future change.	No change.	No immediate action required. Update required on any future change.
14. Shared Information	G	G	G	G	Update required on any change.	A data sharing audit was completed by SQA's internal auditors, Scott-Moncrieff, in December 2018. This concluded that SQA has robust and efficient controls in place for the sharing of personal data. Two improvement actions in relation to the guidance provided to staff were identified. The guidance has been updated accordingly.	The Assessment Team acknowledge the receipt of the *Internal Audit Report*. The Keeper has previously commended the idea of drafting in internal audit, when possible, to consider information governance processes in an authority. Following the internal audit review SQA updated it information sharing guidance document and the	A review of SQA's data sharing agreement templates was completed in July and a review of existing agreements is currently underway. No changes have been made to the data sharing guidance or processes.	Further evidence of appropriate review here. This is a commendable theme in this PUR and fully in line with commitments to review and update made in the original agreed RMP.

					The Keeper is provided with an updated copy (Item 15)	Assessment Team acknowledge the receipt of the new version.		

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

<u>Version</u>

The progress update submission which has been assessed is the one received by the Assessment Team on 13th November 2020. 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 the **Scottish Qualifications Authority**.

The Assessment Team has reviewed the 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.

<u>General Comments</u>

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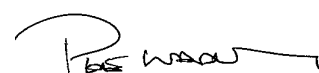
The Keeper cannot change the status of elements formally agreed under a voluntary submission, but he can use such submissions to indicate how he might now regard this status should the authority choose to resubmit its plan under section (5)(6) of the Act.

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

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

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Pete Wadley
Public Records Officer