The Public Records (Scotland) Act 2011

Scottish Qualifications Authority

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

17th January 2020

Contents

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1. Public Records (Scotland) Act 2011

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

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

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

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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

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5. Assessment Process

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

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

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

Key:

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

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Progress Update Review (PUR) Template: Scottish Qualifications Authority

Element	Status of elements under agreed Plan 13AUG15	Status of evidence under agreed Plan 13AUG15	Progress assessment status 06FEB19	Progress assessment status, 17JAN20	Keeper's Report Comments on Authority's Plan, 13AUG15	Self-assessment Update 06FEB19	Progress Review Comment, 06FEB19	Self-assessment Update as submitted by the Authority since 06FEB19	Progress Review Comment, 17JAN20
1. Senior Officer	G	G	G	G	Update required on any change	No change	No immediate action required. Update required on any future 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'.
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.	Since the RMP was agreed, an annual review of SQA's Records Management Policy has been undertaken. The last review and update was in May 2018 to coincide with changes in data protection legislation. The Keeper is provided with an updated policy (Item 1).	The supply of the Records Management Policy v4.1 is noted with thanks. Keeping the Policy under review and up to date is best practice.	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 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

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									authority's submission may be kept up-to-date.
4. Business Classification	**A**	**G**	**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.	SQA's current business classification scheme encompasses SQA's functions, activities and transactions and provides the structure for SQA's retention schedule. Each year as part of the retention schedule's annual review, a review of the BCS is also undertaken and updates made where new activities and transactions have been created or existing ones stopped. The Keeper is provided with an updated copy of the BCS (Item 2). A pilot was undertaken late 2015/early 2016 within the Strategic Planning and Governance business area. This tested the process for mapping existing folder structures to the BCS, aligning them with the corporate Retention Schedule and resulted in the creation of a new file plan for the business area. This continues to be in use and is kept under review. Following this, work has been completed within the HR business area to develop and	The Keeper thanks the SQA for providing an updated copy of the business classification scheme. Using the business classification scheme as the structure for the retention schedules is good practice, as is the regular review and updating described. It is clear that the SQA have put considerable work into developing and implementing the business classification scheme. They are well on track to completing this with all business areas. The decision to delay while organisational and technological changes are developed is sensible and demonstrates careful planning. SharePoint is being used by a number of public authorities for records management purposes. The Assessment Team would welcome the wider sharing of expertise developed and lessons learned from the SQA's investigations of the usefulness of this software. The RAG status of this element remains at Amber at present but the SQA are to be commended for the continuing commitment to this work and it is likely that once this has been completed the	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.

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	🟧	🟩	🟧	🟧	implement a new file plan based on the BCS and work is ongoing within the OD and Change Management and Qualifications business areas as well as a review of the existing file plan in the Contract Operations business area. However, the BCS is not yet used throughout SQA as the structure for all electronic files. The reason for this is that since the agreement of the RMP SQA has undergone significant organisational and technological change, including the move from IBM products to the O365 suite. As part of this technological change, SQA is at the early stages of reviewing our current and potential use(s) of the O365 products. This includes investigating the use of SharePoint for the creation and management of SQA's information and records resulting in a change of approach to the implementation of our BCS. Members of the Information Governance team are part of the group currently undertaking this work.	RAG status would be moved to Green.		
	G	**G**	**G**	**G**	Update required on any change	Updates are made to SQA's retention schedule on an	The updated retention schedules are noted with thanks. It is clear	Updates to SQA's retention schedule continue to be made on an ongoing basis,	The Assessment Team note that the annual review of the

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Element									
5. Retention Schedule						ongoing basis, with a more formal full-scale review undertaken annually. This year's review is currently underway, having been delayed to allow for the work required by the implementation of GDPR and certification of SQA qualifications. The Keeper is provided with an updated copy of SQA's retention schedule (Item 3).	that there have been changes in line with business needs, which is good practice.	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).	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)**.
6. Destruction Arrangements	G	G	G	G	Update required on any change	A review of SQA's destruction arrangements resulted in minor amendments to the guidance and destruction forms. The process itself remains unchanged. The Keeper is provided with copies of the updated guidance and forms (Items 4 and 5).	The updated guidance and forms are noted with thanks. The guidance is clear and should be helpful to all staff responsible for carrying out the destruction of records.	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.
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	Updates have been made to SQA's Information Security Policy whilst the IT Computer and Communications Acceptable Use Policy, has been replaced by the IT	The Keeper thanks the SQA for the updated policies. These are particularly important policies for an organisation which deals with critical personal information. The specifics are a	A full review of SQA's Security Incident Management Procedures was completed at the beginning of 2019. This resulted in improved guidance and a refreshed reporting form. The Keeper is provided with an updated copy of the reporting form and guidance (Items 6 and 7).	The Assessment Team acknowledge the receipt of their latest *Security Incident Report* pro-forma and *Security Incident Management Procedures* (March 2019). These will be

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					and Communications Acceptable Use Policy and have agreed to submit all revised documents to the Keeper to ensure that the evidence package for this authority remains up-to-date. This is welcomed by the Keeper and he looks forward to receiving these updated documents when available.	Acceptable Use Policy. SQA's terms and conditions of appointment have been updated to include specific information security responsibilities. In addition, all new staff are required to sign a confidentiality agreement. This was issued to existing staff via our metacompliance software. The Keeper is provided with copies of these additional documents (Items 6-9).	business matter for the SQA, but the policy addresses a wide range of eventualities and appears comprehensive and clear. The continued commitment to information security is to be commended.	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.
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.	Prior to the implementation of the General Data Protection Regulation all of SQA's data protection processes, procedures and key documents were reviewed and updated. Updated copies of SQA's Data Protection Policy and privacy statement, along with SQA's new Record of Processing, can be found on our website at the following link: https://www.sqa.org.uk/sqa/57681.html As per the requirements of the GDPR, SQA has introduced a Data Protection Impact Assessment; this	The Keeper thanks the SQA for the updates to procedures that have been supplied. It is clear that the SQA take Data Protection issued very seriously and have a commendable commitment to continuous review and improvement. The new Data Protection Impact Assessment documentation supplied are easy to follow and should assist staff in carrying out their responsibilities under the Data Protection Act. The training packages provided are well structured, straightforward and impressively enjoyable to read. They have clearly been carefully designed to target the	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 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.	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 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.

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						replaces the Privacy Impact Assessment tool. The Keeper is provided with copies of the assessment template and associated guidance (Items 10 and 11). As part of our GDPR preparations, with updated data protection training was provided to staff and a simplified version of this has now been included in SQA's induction programme. The Keeper is provide with copies of the training (Items 12 and 13). As a public body, SQA now has an appointed Data Protection Officer.	needs of SQA staff. The use of a group exercise incident scenario tailored to SQA circumstances is practical and effective. SQA have decided that the role of Data Protection Officer (DPO) should be carried out by the Records Manager. This is a business matter for the SQA: there are certainly clear benefits in ensuring that Data Protection requirements are considered within the full range of records management functions.		
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.	In 2015, business continuity co-ordinators were appointed and trained for each business area. Training is refreshed annually and the co-ordinator forum meets every 6 months to share good practice, identify training needs and discuss any issues. The Keeper is provided with the co-ordinator role description (Item 14).	The Keeper thanks the SQA for this update and for the commitment shown to implement this aspect of the Records Management Plan as agreed. The use of regular exercises as mentioned in the co-ordinator role description is best practice. The Assessment Team would be interested to hear about any exercises which deal extensively with recovery of vital records in future PURs.	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.

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									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 may be kept up – to-date.
11. Audit Trail	G	G	G	G	Update required on any change	No change	No immediate action required. Update required on any future 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.
12. Competency Framework	G	G	G	G	Update required on any change	Information governance training is now included in the SQA induction programme and specific information security responsibilities have been added to SQA's terms and conditions of appointment. Quarterly Info Rep meetings were introduced in 2017. These provide the Info Reps with the opportunity to highlight any issues/concerns, share good practice and for the Records Manager to provide updates and identify any training needs.	The inclusion of information governance training at induction is very positive. The enables all staff to have an understanding of the value of records management in an organisation which holds critical information affecting much of the population of Scotland. The addition of quarterly meetings is a useful initiative supporting excellence in records management. The Assessment Team would be interested to hear about resources and support for the professional records management staff in future PURs.	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 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.	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.

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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. | All of SQA's information management policies, procedures and guidance documents undergo regular review.

Self-assessment questionnaires continue to be used to identify levels of compliance with the RMP and to identify any areas of good practice as well as weaknesses. Where areas of weakness have been identified, the Records Manager has worked with teams to improve understanding, provide guidance and where necessary implement process improvements.

Many of these activities are undertaken with the engagement of business area 'Info Reps' and supported by the quarterly Info Rep meetings.

The Information Governance Steering Group continues to have oversight of SQA's RMP; providing support for the implementation of effective information governance practice and a forum for the discussion and resolution of information governance issues. | The submission of this PUR is very welcome and demonstrates the SQA's on-going commitment to review and development of its Records Management Plan.

The acknowledgement that areas of weakness are occasionally identified is very encouraging. It would be unusual not to encounter issues from time to time, even with the well-structured training and procedures training that are in place. The quarterly meetings described under Element 12 are also a positive contribution to this aspect of Element 13.

It is important to ensure both operational and strategic input to regular reviews and the SQA have established systems which enable this to happen. | No change. | No immediate action required. Update required on any future change. |
| 14. Shared Information | **G** | **G** | **G** | | | Update required on any change | SQA's data sharing guidance and the data sharing agreement template | The updated guidance is noted with thanks. | A data sharing audit was completed by SQA's internal auditors, Scott-Moncrieff, in December 2018. | The Assessment Team acknowledge the receipt of the *Internal Audit Report*. The |

| | | | | | | have both been amended to reflect the recent changes in data protection legislation. The process for managing agreements once in place remains the same.

The Keeper is provided with updated copies (Items 15 and 16).

A data sharing audit is scheduled to be undertaken by SQA's internal auditor, Scott-Moncrieff, in December 2018. This audit will be used to identify any areas for improvement. | | 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 Keeper is provided with an updated copy (Item 15) | 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 Assessment Team acknowledge the receipt of the new version. |

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

Version

The progress update submission which has been assessed is the one received by the Assessment Team on 8th November 2019. 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**.

PRSA Assessment Team's Summary

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

General Comments

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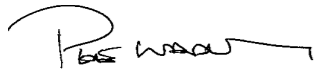
Where 'no change' has been recorded under the update on provision by the authority, the Assessment Team is happy to agree that these elements require no further action for the time being.

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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

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