

The Public Records (Scotland) Act 2011

Water Industry Commission for Scotland

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

6th April 2020

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1. Public Records (Scotland) Act 2011

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

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

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

2. Progress Update Review (PUR) Mechanism

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

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

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

3. Executive Summary

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

4. Authority Background

The Water Industry Commission for Scotland is a non-departmental public body with statutory responsibilities. Its mission is to manage an effective regulatory framework which encourages the Scottish water industry to provide a high-quality service and value for money to customers and acts independently of Ministers. Water Industry Commission for Scotland also has a statutory duty to promote the interests of customers. It does this by setting prices for water and sewerage services that deliver Ministers' objectives for the water industry at the lowest reasonable overall cost. The price setting process takes place every six years. In November 2014 they published a Final Determination, which set charge caps for the regulatory control period 2015-21.

It is part of their role to facilitate competition in the Scottish water industry. In April 2008 the Scottish water and sewerage market for all non-household customers was opened up to competition. These new arrangements are already bringing significant benefits to Scotland's 130,000 business customers, offering better value for money and services that are more tailored to customers' needs.

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	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: Water Industry Commission for Scotland

Element	Status of elements under agreed Plan 13DEC16	Status of evidence under agreed Plan 13DEC16	Progress assessment status 15JUN18	Progress assessment status 06APR20	Keeper's Report Comments on Authority's Plan 13DEC16	Self-assessment Update 07MAR18	Progress Review Comment, 15JUN18	Self-assessment Update as submitted by the Authority since 15JUN18	Progress Review Comment 06APR20
1. Senior Officer	G	G	G	G	Update required on any change	Senior Management responsibility has changed following an office restructure. Our Chief Operating Officer, Michelle Ashford now has overall responsibility for records management within the Commission.	The Keeper thanks the WICS for this update.	No changes to record.	No immediate action required. Update required on any future change.
2. Records Manager	G	G	G	G	Update required on any change	No change.	No immediate action required. Update required on any future change	The Records Management Working Groups and Project Boards were dissolved during the Records Managers maternity leave. Since return, the Records Manager has been continuing to work alongside a smaller group made up of the Senior Officer and Assistant Manager for Analysis and Strategy. Assistance is sought from the DPO on any data protection related queries. Relations are improving between the Records Manager and IT Team given the increased focus and pressures around information security and cyber resilience.	Thank you for this update regarding the structure of information governance in the Commission. The adjustment of reporting and oversight arrangements is a usual part of the business of a public authority. However, the Keeper would be concerned if these adjustments resulted in less resource being provided for records management or if reporting to senior management became less coordinated. The authority must consider this and the Assessment Team offers support if necessary. Alternatively the changes described may result in a similar (or improved) system to the Working Groups. Unless informed otherwise this element remains Green.
3. Policy	G	G	G	G	The Commission intends to develop a programme of induction and on-going refresher training. The Keeper commends this approach to training staff in their records management responsibilities	We have recently awarded a contract for HR and compliance work and we are working with the contractor to develop a training work plan which	Recent developments demonstrate the Commission's continuing commitment to training of staff and the Keeper would welcome samples of this training once available.	Through 2019 we have been working with our DPO to ensure records management training (including data protection and FoI) is rolled out to every new employee by way of induction. This is	The Assessment Team notes that the authority has a new governance document which is not yet publicly available in full. Sections are published to the authority's corporate website, for

					<p>and requests that he is sent a sample of this training once it has been developed and rolled-out.</p>	<p>will cover staff training requirements on an annual basis.</p> <p>Induction packs have not been formally developed however it was agreed at a recent records management project board meeting that records management related policies will form the induction pack for any new employee and professional induction training will be provided from our external DPO (also recently appointed).</p> <p>In the last month, SharePoint training has been organised for all staff and will take place on 05 June 2018. This will be a top up to training that was provided when we first set up SharePoint as our document storage facility and following this, there will be an option for staff to participate in webinars to broaden their knowledge. Following a proposed SharePoint restructure project, additional training will be provided for staff although this will likely be nearer 2020 post project.</p>	<p>A number of authorities have developed e-learning modules and the Assessment Team would encourage the WICS to consider whether customising existing training might meet their needs.</p>	<p>often in addition to an informal meeting with the Records Manager within the first week, and refresher training which is carried out annually.</p> <p>Much work has been underway to revise our suite of records management policies which is now collectively known as the 'Information Management' Policy. This is shared with new employees as one pack but can also be published in separate sections as required, for example, the 'Access to information' policy on the FoI pages of our corporate website.</p> <p>Records Management Guidance is currently being developed to sit alongside our policies. In addition to this formal guidance, we are preparing a 'lighter reading pack' which will focus on assisting staff with the day to day aspects of records management.</p> <p>The Records Manager is looking for the Commission to develop its own e-learning platform however this piece of work is only at the very initial stages of discussion.</p>	<p>example the 'access to information' policy is available in the Freedom of Information section: https://www.watercommission.co.uk/view_Freedom_of_information.aspx</p> <p>It is available in full to WICS staff.</p> <p>This Information Management Policy replaces the Records Management Policy agreed by the Keeper in 2016.</p> <p>The Assessment Team acknowledges that the authority is developing further records management guidance and considering bespoke training (see element 12 below). This is to be commended. The Assessment Team looks forward to an update on the delivery of this guidance in subsequent PURs.</p>
4. Business Classification	A	G	A	A	<p>The Commission is working on creating a combined Business Classification Scheme and Retention Schedule, with a target date for full roll-out of May 2018. The Keeper commends this endeavour and requests that he is kept informed of the progress of this work as it progresses.</p> <p>The Keeper can agree this element on an 'improvement model' basis. This means that the authority has identified a</p>	<p>The Commission's business classification and retention schedule has been developed since our formal submission in July 2016 to take into account changes in terms of the GDPR coming into force in May 2018. However, in planning to become GDPR compliant we have undergone a cleanse of our data and have begun considering</p>	<p>The Keeper thanks the WICS for providing an update as required under the agreed Records Management Plan. The development of a combined Business Classification Scheme and Retention Schedules is good practice. Investing the time to develop appropriate and workable solutions is sensible and will contribute to the ability of the authority to comply with GDPR.</p>	<p>The Commission has made huge improvements to its business classification and retention schedule, which has recently been renamed as the 'asset register'.</p> <p>This register has been updated to ensure it contains a far more streamlined and coherent record of the data we hold, and how its stored and handled.</p> <p>In 2019, Information Asset</p>	<p>In previous updates the Water Industry Commission for Scotland have indicated that they were pursuing an information asset register style structure around the management of their public records. The Assessment Team acknowledge that this action has now been completed.</p> <p>The achievement of this</p>

					<p>gap in provision (the lack of an organisation-wide operational BCS) and has evidenced a commitment to closing this gap and the timescales for undertaking this work. As part of this agreement, the Keeper requests that he is kept informed of the progress of this work.</p>	<p>a further project to refresh and restructure our document depository (SharePoint). This work has had an impact on our schedule which again needs to be updated to reflect such changes. We hope in future to have more automation in place in terms of retentions etc which means this schedule will be easier to maintain and keep up to date.</p>		<p>Owners were tasked with agreeing suitable retention periods for each data type they have responsibility for. This should enable the Records Manager to work alongside IAOs on a regular basis (quarterly or 6monthly) to ensure data is being archived or destroyed in line with our policies. This will also enable us to make progress with our plans to automate retention policies.</p> <p>Unfortunately, the SharePoint restructure project did not progress during 2018 which means we still have some work to do in building a new SharePoint depository that is structured in a more practical sense, and that will map much easier to our evolving business functions. It is only after this stage we will be able to automate retention scheduling.</p>	<p>objective marks a measurable improvement in the records management provision in the authority.</p> <p>The Information Asset Register is now being monitored at a local level by information asset owners (the involvement of local business areas in the work is vital). The Assessment Team looks forward to updates in subsequent PURs.</p> <p>The Commission currently uses SharePoint as its document depository and that it intended to revise the structure of the SharePoint libraries to better align with the organisation's functions. The assessment Team acknowledge that this plan stalled recently. Even when restarted, the SharePoint restructure project is bound to be incremental and potentially take several years to bed-in properly. That said, the work done on the IAR will be of immense help in ensuring that the SharePoint structure is configured to support robust records management.</p> <p>The Assessment Team reminds the Commission of the importance of appropriate policies, governance and staff training in making these SharePoint improvements a success. The Keeper would expect to see evidence that these issues are being addressed while the revised SharePoint solution is rolled out.</p> <p>This element remains at Amber while this work is ongoing.</p>
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5. Retention Schedule	A	G	A	A	<p>As the retention schedule will form part of the Business Classification Scheme, the Keeper requests updates regarding the development of this combined document.</p> <p>The RMP states that once the BCS/retention schedule has been rolled-out there will be designated individuals responsible for ensuring compliance with the requirements of the schedule. The Keeper would be interested to learn whether these individuals have yet been identified.</p> <p>The Keeper can agree this element on an 'improvement model' basis. This means that the authority has identified a gap in provision (the lack of an organisation-wide operational retention schedule) and has evidenced a commitment to closing this gap and the timescales for undertaking this work. As part of this agreement, the Keeper requests that he is kept informed of the progress of this work.</p>	<p>As part of the ongoing work, individual 'data owners' have been identified as responsible for certain areas of our file structure. Internal data owner workshops have been scheduled to take place week commencing 05/03/18 to discuss future plans for SharePoint structures. As recognised by the Keeper, this work ties in with element 4 above.</p>	<p>The Keeper thanks the WICS for this update on progress and is pleased to note that data owners have now been identified.</p> <p>The original target date for roll-out of the combined BCS/Retention Schedules was May 2018. There appears to be some slippage in this timetable but this is to be expected and there is evidence of some progress.</p>	Please see update above.	<p>The Commission has combined its business classification scheme and retention schedule into a single structure now known as the 'asset register'.</p> <p>The combination of BCS and retention in a single document (the basis of an information asset register) is commended as being likely to create a stronger business tool.</p> <p>See element 4 above and element 6 below for comments around the adoption of an improved SharePoint solution.</p>
6. Destruction Arrangements	A	G	A	A	<p>The RMP states that at present there is no means of recording paper files which have been destroyed but that this will be built into the retention schedule once finalised. This is welcomed by the Keeper, who would be pleased to receive updates on this initiative.</p> <p>It would also appear that the destruction of electronic records is built in to the plan to develop and roll-out the retention schedules. Individuals within local business areas will also ensure that destruction decisions are applied consistently. The Keeper asks for clarification concerning whether the destruction of electronic files will be an automated process or require</p>	<p>Work is still underway in implementing destruction arrangements for paper and electronic files. This falls into the work being carried out for elements 4 and 5 above. It is expected that the destruction of electronic files will be automated via SharePoint tools. We plan for data owners and the records manager to be informed by the system when files are due to be destroyed to ensure this is always carried out appropriately and in line with our policies and requirements.</p>	<p>The Keeper thanks the WICS for providing an update as required under the agreed Records Management Plan.</p> <p>There is a continuing gap in provision which will need to be addressed as elements 4 and 5 are improved.</p>	<p>As highlighted in points 4 and 5 above, the asset register has improved significantly and does allow for a note to be added when a data type is archived or destroyed.</p> <p>Unfortunately, given the absence of the Records Manager and the cancellation of the SharePoint restructure project, the work of automating this process via SharePoint has been delayed.</p> <p>The Records Manager has recently been involved in the SharePoint surgery run by NRS to gain an understanding of how other organisations are dealing with similar difficulties with SharePoint i.e. ensuring it is</p>	<p>The Assessment Team notes that the controlled, secure and irretrievable destruction of electronic records is still a work in progress and accepts that the improvements expected once SharePoint is restructured should assist in making arrangements more robust (and possibly automatic).</p> <p>However, this functionality will probably not be universally operational for some time. In the meantime, it will remain important that staff are correctly prompted to destroy records appropriately.</p> <p>This element remains at amber.</p>

					<p>the input of these individuals and the records manager. The Keeper requests that he is kept informed of the work being undertaken in this area, and to be updated on the recording of electronic file destruction once the retention schedules become operational.</p> <p>The Keeper can agree this element on an 'improvement model' basis. This means that the authority has identified a gap in provision (the destruction of electronic records) and has evidenced a commitment to closing this gap. As a condition of this agreement, the Keeper will need to be kept updated on the progress of the work to close this gap and further information about the proposed processes for the deletion of electronic records.</p>			properly structured to allow labelling and automated retentions to work properly. For this to succeed, it also requires buy-in from colleagues and senior management when it comes time for reviewing and archiving or destroying data.	<p>Digital records aside, the Keeper's original improvement plan agreement was also based on the suggestion that the authority was not confident it was correctly recording the destruction of paper files (although the method of destruction by an outside contractor was appropriate). The Assessment Team is pleased to acknowledge that the new asset register allows for the destruction of paper records to be recorded.</p> <p>As noted above, the authority's asset register marks a significant improvement in their records management arrangements.</p>
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 changes to record.	No immediate action required. Update required on any future change.
8. Information Security	G	G	G	G	Update required on any change	<p>The Commission achieved the "Cyber Essentials Plus" certification in February 2018. This independent assessment passed the Commissions systems against a number of key technical security controls including;</p> <ul style="list-style-type: none"> • Malware Protection • Secure Configuration • Boundary Firewalls and Internet Gateways • Patch Management • Access Control <p>This area of the plan has been updated to reflect positive alterations to the Commissions</p>	The achievement of Cyber Essentials Plus certification demonstrates good practice and strengthens the already robust procedures for information security.	<p>In 2019, the Commission took part in an internal audit review of its cyber resilience, this included testing against Cyber Essentials Plus (CE+) and NCSC's ten steps to cyber resilience.</p> <p>We have also obtained CE+ accreditation for the second year.</p>	<p>The Assessment Team notes that the authority has been awarded Cyber Essential Plus certification: https://www.qgstandards.co.uk/qgce1526/.</p> <p>For internal audit see element 13 below.</p>

					information security, but also to address the level of sensitive information which had been provided previously.				
9. Data Protection	G	G	G	G	Update required on any change	No change (other than minor references to the GDPR).	No immediate action required. Update required on any future change.	No changes to record.	As with all other Scottish public authorities the Water Industry Commission have been required to review and update their data protection procedures in light of the 2018 legislation. The Assessment Team acknowledges that the public facing Commission website has been updated appropriately: https://www.watercommission.co.uk/view_Privacy.aspx .
10. Business Continuity and Vital Records	G	G	G	G	The Keeper would welcome updates on the work to identify and include the Commission's vital records within the combined BCS/Retention Schedule.	The Business Continuity Team has recently been renamed the Incident Management Team and the Records Manager has joined this group. Discussions have taken place to consider vital records and this will be further discussed at the data owner workshops. The office is currently undergoing a restructuring project which is expected to involve the purchase or fire proof cupboards for our vital paper records (such as approved financial records e.g. signed POs, credit card statements etc).	The Keeper is pleased to see the inclusion of the Records Manager in the WICS Incident Management Team which acknowledges the importance of the authority's information and records assets. The protection of vital records is being taken seriously at appropriate levels within the authority.	No changes to record.	No immediate action required. Update required on any future change.
11. Audit Trail	A	G	A	A	The Commission is working to move its records system from a shared drives network to a cloud based SharePoint system using Office 365. This should allow the authority to more thoroughly audit the records held on this system. This is commended by the Keeper, who would be interested to receive updates	The Commission successfully transitioned from the shared drives network to the cloud based SharePoint system via Office 365. This has helped us to develop our records management work in terms of investigating what tools SharePoint	The Keeper thanks the authority for providing an update as required under the agreed Records Management Plan and notes that the gap in provision (lack of a consistent method of naming documents) is still outstanding.	We have built a section on naming conventions into our records management guidance document. Although this hasn't been formally rolled out, we are aiming to do so in the coming months. Hopefully this will provide staff with some pointers on the best way to name their files, which of	The Assessment Team is pleased to acknowledge that the Commission has now added naming conventions into its records management guidance document. This was a commitment in the original submission and in the previous PUR. Being able to locate

					<p>on the progress of this work.</p> <p>The Commission also intends to develop file naming conventions as part of its corporate style guidance. The estimated completion date for this work is the end of 2017. The Keeper requests that he is sent this guidance once it has been developed and is operational.</p> <p>The Keeper can agree this element on an 'improvement model' basis. This means that the authority has identified a gap in provision (lack of a consistent method of naming documents) and has evidenced a commitment to closing this gap. As a condition of his agreement, the Keeper requests that he is kept informed of the work as it progresses.</p>	<p>can offer to assist with things like retention scheduling, naming conventions and access controls.</p> <p>The corporate style guidance work was not carried out in 2017 but we are currently working with a stakeholder engagement expert who may look at this as part of the wider piece of work being done in terms of our communications strategy, both internal and external. Despite this, naming conventions have been considered and again will be discussed with data owners in due course.</p>		<p>course helps with various other functions such as 'search'.</p>	<p>records by searching is fundamental and this marks a measurable improvement in records management provision in the authority.</p> <p>This element remains at Amber while the SharePoint improvements are underway.</p> <p>It should be noted that, if this were a formal re-submission the adoption of robust naming conventions could be grounds for moving the RAG status of this element to Green.</p>
12. Competency Framework	A	G	A	G	<p>The Records Management Work Plan, which is built into the RMP, has the provision of guidance for staff and the production of staff training programmes as key objectives. The Keeper commends this commitment to training and requests that he is sent a sample of the staff guidance and training when it becomes available.</p> <p>The Keeper can agree this element on an 'improvement model' basis. This means that the Commission recognises that records management forms a key work area of relevant staff and the appointed records manager has access to relevant training and has identified the training of staff as a key objective and has outlined the timescale for developing a programme of training and guidance in records management for all staff. As part of this agreement, the Keeper requests that he is provided with examples of staff training and guidance documents once</p>	<p>Staff guidance is being developed and will be shared with the Keeper in due course. We currently have a classification guidance document and breach reporting procedures ready to be approved by senior management however further work is required in other areas where staff will require guidance. Policies have been reviewed and are expected to be rolled out in the next few months. Following the office restructure, the records manager (now senior support officer for risk and records) has been able to gain more focus and control over the office's records management procedures. Between Oct 17 – Jan 18, staff have been trained in Data protection, GDPR and FoI which feeds into understanding good records management</p>	<p>The Assessment Team note that staff guidance and training is being developed and that there is a concentration on compliance with GDPR across the authority. However, additional records management training and/or professional development opportunities for the named individual under Element 2 ("Records Manager") is required if the authority is to achieve a green rating for their competency framework under Element 12. Demonstrable support for a broad range of records management development will ensure that the Commission continues to benefit from skills appropriate to the scale of the organisation.</p>	<p>As noted above, staff guidance is nearing completion and should be rolled out to staff in the coming months. This will sit alongside our newly published suite of records management policies and procedure documents.</p> <p>Since 2018 there have been 3 training sessions scheduled to cover records management, GDPR/DP and FoI. These sessions have each been rolled out to all staff to attend. These have been carried out by our DPO.</p> <p>In addition, sessions were scheduled and attended by the Commission Board Members and the Audit and Risk Committee Members. These have been carried out by our DPO.</p> <p>Mid 2018 a SharePoint End User Level 1 session was scheduled with QA Training. All staff were invited to attend this session.</p>	<p>The Assessment Team is happy to acknowledge the steps taken by the Commission in ensuring that staff creating, or otherwise processing records, are appropriately trained and supported.</p> <p>A suite of records management policies has recently been published to staff and it is noted that staff guidance is expected to follow shortly.</p> <p>Through 2019 they have been working with their DPO to ensure records management training (including data protection and FoI) is rolled out to every new employee by way of induction.</p> <p>Refresher training is carried out annually.</p> <p>The authority is preparing a 'lighter reading pack' which will focus on assisting staff with the</p>

					<p>this has been created and is operational.</p>	<p>and being clear about why. The records manager participated in a four-day intensive GDPR certified practitioner course run by QA training. This was followed up with many in-house GDPR sessions.</p>		<p>In the autumn of 2019, all staff were asked to participate in the GDPR E-Learning training module sourced from Act Now Training. This module included two quizzes which tested their basic knowledge of data protection requirements.</p> <p>In 2019, the Records Manager and Head of IT both successfully participated in and passed the BCS Certificate in Information Security Management Principles. This increases knowledge and awareness in the Commission of information security practices.</p> <p>Also, towards the end of 2019, the Records Manager attended the 'advanced records management' training course (sessions 1 and 2 had been attended in previous years). Consideration is being given as to whether the trainer, who is also a consultant in the field of records management, could possibly provide any guidance and support to the Commission in making further improvements to its records management practices.</p> <p>The Commission is aware of the public sector training programme which has been recently developed by Frank Rankin. The Records Manager is considering this training for 2020-21.</p>	<p>day to day aspects of records management.</p> <p>Furthermore, the Assessment Team is pleased to support the idea of the Commission to develop its own e-learning platform in information governance (see under element 3).</p> <p>The Assessment Team notes this utilisation of external training and commends the allocation of resource to this.</p> <p>There is also ample evidence that key records management staff have access to appropriate training and development. This is to be strongly commended.</p> <p>Finally, the Assessment Team notes the authority is considering training offered by Frank Rankin. The Keeper is, obviously, unable to recommend one particular training provider over another. However, it is a fact that the PRSA Assessment Team has had a long and fruitful relationship with Frank he has discussed the content and objectives of his PRSA course with us.</p> <p>It is likely that, if this were a formal re-submission under section 5 of the Act, this element of the Commission's plan would be upgraded to a Green RAG status.</p>
13. Assessment and Review	G	G	G	G	<p>The Commission has outlined the procedures in place for assessing and reviewing its records management systems and has identified the process by which the records manager will notify the Director of Corporate Affairs and Strategy</p>	<p>The records management working group now meet on a fortnightly basis to review progress and actions. We have also set up a records management project</p>	<p>The review arrangements as described are sensible and appropriate to the needs of the authority.</p>	<p>Although we no longer have the records management working group or project board, the Records Manager and DPO meet on a monthly basis, while the Senior Officer and other colleagues continue to be involved in</p>	<p>See element 2 for comments about the restructuring of the records management monitoring group.</p> <p>The Assessment Team notes the potential formation of a new</p>

					<p>on any progress or issues.</p> <p>Analysis using a Generally Accepted Records Keeping Principle (GARP) methodology will be employed for identifying the current situation and assessing levels of provision and compliance. This assessment will be conducted on an annual basis.</p> <p>The RMP also states that once the Plan is signed off, internal auditors will carry out a full review of the Plan. Partial reviews will be conducted thereafter.</p> <p>The Keeper commends the authority's commitments under this element and would welcome updates following these reviews/audits, particularly if they lead to changes in records management arrangements.</p>	<p>board who has been meeting once every 3 weeks in the lead up to GDPR implementation and will continue to meet every 6 weeks post 25 May 2018. This group enables us to feed progress to senior management. This will help us to push on and formalise things like staff guidance and procedures.</p> <p>A GARP analysis is completed annually to measure progress.</p> <p>A review was carried out on our records management procedures in 2016-17 by our internal auditors. Recommendations are being considered and implemented as appropriate although there were no significant changes proposed.</p>		<p>various discussions.</p> <p>Relations between the Records Manager and IT Team have improved and increased in the last year given the huge drive on GDPR and Cyber resilience. It is likely a new group will be formed in due course which will focus on information governance, and therefore include records management.</p> <p>We continue to complete an annual GARP analysis to measure our progress.</p> <p>In 2019, the Commission requested the Internal Auditors carry out a review on GDPR and information governance arrangements. The results of this review were reassuring.</p>	<p>information governance group and looks forward to an update on this proposal in subsequent PURs.</p> <p>Furthermore, they note the use of the organisation's internal audit to review GDPR practices and information governance. The Keeper has previously commended the use by an authority of audit facilities (internal or external) that are independent of the information governance team as liable to produce an objective view of progress.</p> <p>The Assessment Team notes that, in 2019, and now subsequently in 2020, the Commission took part in a review of its cyber resilience, this included testing against Cyber Essentials Plus (CE+) and NCSC's ten steps to cyber resilience.</p>
14. Shared Information	G	G	G	G	Update required on any change	No change.	No immediate action required. Update required on any future change.	No changes to record.	No immediate action required. Update required on any future change.

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 6th February 2020. The progress update was submitted by Kirsty McLean, Records Manager.

The progress update submission makes it clear that it is a submission for the Water Industry Commission for Scotland.

PRSA Assessment Team's Summary

The Assessment Team has reviewed the Water Industry Commission for Scotland'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 Water Industry Commission for Scotland 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.

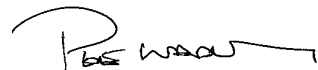
The Keeper cannot change the status of elements formally agreed under a voluntary submission, but he can use such submissions to indicate how he might now regard this status should the authority choose to resubmit its plan under section (5)(6) of the Act.

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

Based on the progress update assessment the Assessment Team considers that the Water Industry Commission for Scotland 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