

The Public Records (Scotland) Act 2011

Water Industry Commission for Scotland

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

23rd June 2025

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1. The 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 Review 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 (WICS) is the economic regulator of Scottish Water, a publicly owned business that serves millions of people and businesses across Scotland. They work for customers, communities and the environment. The Scottish water and sewerage sector is a £1.2bn industry that improves infrastructure, creates jobs and supports livelihoods across Scotland. WICS works to ensure that Scotland's water is sustainable both today and for generations to come by ensuring that Scottish Water has the funding it needs to:

- continue to deliver a flourishing and improving aquatic environment, and drinking water to be proud of;
- ensure that its assets – such as pipes and sewers – are better able to withstand future unexpected events;
- make the transition it needs to achieve the ambitious target of net zero emissions by 2040.

The work that WICS do is wide-ranging – from benchmarking Scottish Water's costs and challenging Scottish Water to improve its performance, to ensuring that customers' views are at the heart of its decision making.

5. Assessment Process

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

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

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

Key:

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

Water Industry Commission for Scotland

		E1	E2	E3	E4	E5	E6	E7	E8	E9	E10	E11	E12	E13	E14	E15
PUR	2023	G	G	G	A	A	A	G	G	G	G	A	G	G	G	N/A
PUR	2022	G	G	G	A	A	A	G	G	G	G	A	G	G	G	N/A
PUR	2021	G	G	G	A	A	A	G	G	G	G	A	G	G	G	N/A
PUR	2019	G	G	G	A	A	A	G	G	G	G	A	G	G	G	N/A
PUR	2017	G	G	G	A	A	A	G	G	G	G	A	A	G	G	N/A
RMP Status	2016	G	G	G	A	A	A	G	G	G	G	A	A	G	G	N/A
RMP Evidence	2016	G	G	G	G	G	G	G	G	G	G	G	G	G	G	N/A

Element	Status under agreed Plan 13DEC16	Progress review status 08JUL24	Progress review status 23JUN25	Keeper's Report Comments on Authority's Plan 13DEC16 Full Assessment Report at https://www.nrscotland.gov.uk/files/record-keeping/public-records-act/keepers-assessment-report-water-industry-commission-for-scotland.pdf	Progress Review Comment 08JUL24	Self-assessment Update as submitted by the Authority since 08JUL24	Progress Review Comment 23JUN25
1. Senior Officer	G	G	G	Update required on any change.	<p>Thank you. The Keeper's PRSA Assessment Team can confirm that Mr Sutherland's contact details have been removed. For the time being if the Keeper needed to contact the WICS Chief executive's office she will use the enquiries e-mail address you have provided separately.</p> <p>However, for the purposes of the WICS Records Management Plan (RMP) the named senior officer is the Director of Corporate and International Affairs (Donna Very) and, as that has not changed, this element retains its Green RAG status.</p>	WICS continues to work through the organisational change programme which is having an impact on structure and roles/responsibilities organisation wide. The new Director of Finance and Corporate Services will take on responsibility for records management however this position is currently vacant. It is anticipated that the post will be filled by the middle of this year.	<p>Thank you for this update.</p> <p>Please let us know the name of the new Director of Corporate Services when this becomes available. We will then revise the Commission's details on our contacts spreadsheet. The Keeper has previously indicated that a change of an individual identified against a particular element of an RMP does not invalidate that RMP, provided that the role remains substantially similar.</p>
2. Records Manager	G	G	G	Update required on any change.	<p>Thank you for confirming this is unchanged.</p> <p>The Keeper has previously agreed that the identification of this individual as being responsible for the day-to-day</p>	No change to record at present.	No immediate action required. Update required on any future change.

					records management in the authority is appropriate.		
3. Policy	G	G	G	<p>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 and requests that he is sent a sample of this training once it has been developed and rolled-out.</p>	<p>At the time of the Keeper's original agreement of the Water Industry Commission for Scotland's RMP it was noted that supporting policy and guidance documents should be routinely reviewed and updated. It is welcome to acknowledge that this is being done in the Commission.</p> <p>There is no requirement, under PRSA, for WICS to provide the Keeper with a new version of its Information Management Policy, but should they wish to do so the Assessment Team will add it to the authority's file to keep the submission up-to-date.</p>	<p>A full review of the information management policy remains on the workplan to be concluded by the end of 2025. Since our last PUR, we have developed additional policies to support our efforts in information governance, for example:</p> <ul style="list-style-type: none"> • Microsoft 365 policy – currently in draft • Personal data publication policy – currently in draft • Security classifications policy • File naming policy 	<p>Thank you for this update. In the Keeper's original agreement it was noted that the Water Industry Commission for Scotland had indicated a process for ensuring that relevant information governance policies are kept under review. It is welcome to see confirmation that this is being appropriately pursued.</p> <p>There is no requirement under the Act for new policies and guidance documents to be submitted to the Keeper (other than at the time of a full review/resubmission). However, if the Commission wished to voluntarily provide these, (perhaps at the time of the next PUR) this would allow the Keeper to keep their PRSA case file up-to-date.</p>
4. Business Classification	A	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 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>It seems that the roll-out of a single corporate Information Asset Register (IAR) is not yet complete where it appeared a 2018 date was targeted. The PRSA Assessment Team look forward to an update on this at the time of the next PUR.</p> <p>At that point, if the IAR is not fully rolled-out, the Keeper may ask WICS to provide her with a clear timescale for completing the work.</p> <p>The IAR document is likely to combine records type with retention decision and information asset owner and as such will represent a useful business tool for the organisation.</p> <p>It is important that the IAR notes all record types and the systems in which they are managed – Digital shared drives, digital SharePoint, M365 in the cloud, Teams/Exchange, Line of business systems, paper etc. (whichever are applicable in WICS).</p> <p>The Information Asset Register should be set up as a 'living document' liable to adjustment as business needs dictate.</p> <p><i>On the subject of Line-Of-Business systems: The Commission should be</i></p>	<p>While WICS did develop and roll out a full IAR in previous years, it became clear that it was too complex to manage well and quickly became out dated and ineffective. Since our last PUR update we have taken steps to use this to aggregate our data sets and start to develop a revised IAR. Given the organisational change that is underway as mentioned at section 1, we have also taken time to re-evaluate the IAO role and at the same time have created a new IAC role (Information Asset Champion) to support the IAO in good record keeping practices. New IAO allocations were signed off by our Leadership Team on 20 March 2025 – these now align directly with the current organisational structure (with the organisation structured by function). Where there are current vacancies, an interim or deputy IAO has been agreed. While there is still a lot of work to conclude the revised IAR it remains a workplan priority for the next 12-18 months.</p>	<p>The PRSA Implementation Team note that although the roll-out of a corporate Information Asset Register is not yet complete there has been some progress in this direction, even if it is just to establish what system does <u>not</u> work for this particular authority. The Keeper would acknowledge that this objective is clearly still active and has not been abandoned. As this is the case, they would probably be content to maintain the amber 'improvement model' rating on this element while the work explained in this PUR is ongoing. The PRSA Implementation Team look forward to further updates in subsequent PURs.</p>

					<p><i>aware that, in the case of a formal resubmission, the Keeper will be investigating the use of legacy line-of-business systems in more detail than in the initial agreement. These are systems that will sit outside the main records management structure and may not be compliant with the authority's own Records Management Policy. For the purposes of this PUR it is <u>not</u> required that the Commission provides a statement on whether this issue affects them or not.</i></p>		
5. Retention Schedule	A	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>See element 4 above.</p> <p>It is important that all record types, from Board Minutes to Teams chat have retention applied. The development of a full IAR should alert the records management team to where gaps in retention exist. It should also alert staff to the retention imposed on record in their own business areas.</p> <p>At the time of the next PUR the PRSA Assessment Team look forward to an update on the development of the IAR, and a confirmation that WICS is content that all record types, in whatever format they are managed, have retention appropriately applied.</p>	Please see above comment.	<p>See element 4 above.</p> <p>At the time of the next PUR the PRSA Implementation Team look forward to an update on the development of the IAR (which will indicate retention decisions for all record types).</p>
6. Destruction Arrangements	A	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 the input of these individuals and the records manager. The Keeper requests that he is</p>	<p>Once the IAR is in place records requiring destruction should be highlighted and WICS can then impose the relevant destruction mechanisms dependant on format.</p> <p>The Keeper noted some concern, in his original agreement (2016), around the controlled destruction of digital records.</p> <p>In order for the RAG status against this element to be upgraded from Amber to Green, WICS will have to provide a statement confirming all the destruction process (is digital destruction automated or do information Asset owners get prompted by the system to operate a deletion policy themselves?).</p>	<p>WICS currently has automatic retention policies applied to some electronic records, for example, email, Teams chat, Teams posts. However, retention on the main data set (SharePoint) is currently a manual effort and is an area we look to improve upon following the finalisation of our revised IAR.</p>	<p>Thank you for this update around retention which we have commented on against elements 4 and 5 above.</p> <p>However, despite the developments around retention mentioned against element 5 above, there is no suggestion in this PUR that controlled, secure and irretrievable destruction cannot be applied when required. Although getting a public record to the destruction stage may be challenging because of the situation with the IAR development, it seems likely that <u>procedures</u> to destroy records are in place.</p>

				<p>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>			<p>For the 2024 PUR The PRSA Assessment Team are content that this element should retain its Amber Improvement Model rating mapping that at element 4. However, if the IAR project is not fully completed at the time of the Commission's next submission, perhaps we should look again as to whether the current situation is, in fact, compliant for the purposes of this element.</p>
7. Archiving and Transfer	G	G	G	<p>Update required on any change.</p>	<p>No immediate action required. Update required on any future change.</p> <p><i>The Assessment Team would like to alert the Commission that the situation regarding archive provision for born-digital records is one that is currently being focused on by the Keeper. It is likely that a formal proposal for providing access to a permanent digital repository will be part of the Keeper's future expectations of the Scottish public sector's RMP.</i></p> <p><i>To this end the Keeper has recently engaged with all public sector Chief Executives around potential future digital archiving requirements. Once responses to this engagement (which took the form of a survey) have been considered further information should be forthcoming from NRS.</i></p>	<p>No change to record at present.</p>	<p>No immediate action required. Update required on any future change.</p>
8. Information Security	G	G	G	<p>Update required on any change.</p>	<p>No immediate action required. Update required on any future change.</p>	<p>No change to record at present.</p>	<p>No immediate action required. Update required on any future change.</p>
9. Data Protection	G	G	G	<p>Update required on any change.</p>	<p>The Water Industry Commission for Scotland is registered with the Information Commissioner as a data controller: Z2094773</p> <p>They publish a privacy policy online: https://wics.scot/who-we-are/transparency/how-wics-protects-your-data</p> <p>This includes details of service user's rights as a data subject.</p> <p>WICS have a Data Protection Officer. This is contracted in as a service.</p>	<p>The current DPO conducts an annual monitoring exercise and a number of actions arose from the 2024 monitoring. This included a full review of all privacy notices. This review is almost complete and has included the creation of a new privacy notice to support the roll out of any future employee surveys.</p> <p>A review of all access controls associated with WICS critical</p>	<p>Thank you for this update. The review and improvement programme has been noted.</p> <p>Furthermore the Implementation Team note that the Water Industry Commission for Scotland publish a Privacy policy online: Privacy WICS and Access to information WICS.</p> <p>This includes details of service user's rights as a data subject.</p>

					This element retains its Green RAG status.	assets and shared mailboxes has been carried out. Recommendations for improvement and enhanced data protection in the form of access control has been discussed and approved by our Leadership Team (20 March 2025). Work remains underway with our IT Team to fully implement the revised permissions.	This element retains its Green RAG status.
10. Business Continuity and Vital Records	G	G	G	<p>The Keeper would welcome updates on the work to identify and include the Commission's vital records within the combined BCS/Retention Schedule.</p>	<p>Thank you for this update. It is particularly important that business continuity process are reviewed on a regular basis and that this review includes the authority's ability to recover records in an emergency.</p> <p>The Keeper's PRSA Assessment Team concurs that the IAR (see element 4) will assist in establishing the systems in which corporate records are held and this will assist in ensuring recovery.</p>	<p>A record of WICS critical assets is maintained and all vital records will be recorded in the revised IAR as we move forward with this work.</p>	<p>Thank you for this update.</p> <p>The critical asset register has been noted.</p> <p>The recovery of records made temporarily unavailable by an unexpected event is an integral part of the authority's business continuity planning.</p> <p>Staff training is fundamental to the smooth recovery in an emergency (including record recovery). It is expected that the Water Industry Commission for Scotland pursue this training regularly.</p>
11. Audit Trail	A	A	A	<p>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 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>See element 4 above.</p> <p>The authority must be confident that all public records, in all the systems they are managed, remain trackable.</p> <p>Once the IAR (see element 4) is in place WICS will be in a good place to ensure that all corporate records can be tracked in whatever format and in whatever system they are held.</p> <p>For most of these systems in order to efficiently locate the record and ensure the correct version is identified there should be consistency around naming conventions and version control. Some systems apply this automatically (for example SharePoint automates version control and some line-of-business systems impose 'naming conventions').</p> <p>As with other 'Amber' elements above, the finalisation and roll-out of the IAR is a very important step and as noted above the Keeper's PRSA Assessment</p>	<p>See previous comments regarding the revision to the IAR.</p>	<p>As with element 4, the Keeper would probably be minded to retain the amber improvement model grading against this element during the Information Asset Register development process.</p> <p>Clearly as this project goes ahead it will make a considerable difference (and almost certainly an improvement) in the record-tracking capabilities in the Commission.</p>

					Team looks forward to an update on this project at the next PUR.		
12. Competency Framework	A	G	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 this has been created and is operational.</p>	No immediate action required. Update required on any future change.	WICS have approved the purchase of a learning management system specifically for better developing competencies across the organisation in records management, data protection and freedom of information legislation. This is supplemented by the DPO's delivery of training sessions on a range of relevant topics including regulator updates and hints and tips for improving records management.	<p>The Keeper expects staff creating, or otherwise processing records, to be appropriately trained and supported.</p> <p>There are examples in this PUR that show this aspect of records management provision is properly considered by the Water Industry Commission for Scotland</p> <p>For example allocating resource to procuring a learning management system.</p>
13. Assessment and Review	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 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>Section 1(5)(i)(a) of the Act says that an authority must keep its RMP under review.</p> <p>Statements in the PUR, and the completion of the PUR itself (and full engagement with the PUR process since it began), are clear indications that the Water Industry for Scotland are complying with this requirement.</p> <p>The assessment Team looks forward to any updates resulting from the forward workplan in the next PUR.</p>	The DPO has included an RM review as part of the annual data protection review, the findings of which will help inform the implementation of the policies and procedures referenced above.	<p>Section 1(5)(i)(a) of the Act says that an authority must keep its RMP under review. The Keeper's Assessment Team acknowledge that this requirement is being appropriately pursued by the Water Industry Commission for Scotland.</p> <p>They welcome the authority's continued engagement with the Keeper's Progress Update Review (PUR) process.</p> <p>At the time of the original agreement (2016) The Keeper agreed that the Commission had made a firm commitment to review their <i>RMP</i> as required by the Act and have explained who will carry out this review and by what methodology.</p>
14. Shared Information	G	G	G	Update required on any change.	A sample data sharing agreement was provided to the Keeper at the time of the original agreement (2016) and clearly	The most recent RM and data protection review highlighted the need for WICS to revisit this and	Thank you for confirming that that information sharing with other bodies or individuals is appropriately

					<p>agreements like this are subject to review. The routine review of arrangements for sharing information is best-practice.</p> <p>It is important that staff members are made aware of the risks of sharing information. Confirmation that this is provided for relevant staff would be welcome.</p> <p>The Keeper agrees that the Water Industry Commission consider the records management implications of information sharing as is appropriate.</p> <p>Update required on any change to this element.</p>	<p>LT are committed to implementing mechanisms (assisted by technology where appropriate) to better manage information sharing. Some policies have already been drafted (for example, the publication of personal data policy) and further work will be done to ensure the appropriate governance is in place around both BAU sharing and adhoc. This work is already recognised on the workplan and should be implemented over the next 12 months.</p>	<p>controlled and that records management is properly considered. The evidence package that accompanied the last RMP submission included an example of a data sharing agreement and the Keeper was able to agree that the Water Industry Commission for Scotland properly considers records governance when undertaking information sharing programmes.</p> <p>It is important that the processes around information sharing are reviewed and updated to suit business needs and potentially to react to changes in legislation. It is clear that the Commission understand this and has recently agreed to pursue such an update.</p> <p>Therefore, this element retains its Green 'compliant' RAG status.</p>
15. Public Records Created or Held by Third Parties	N/A	N/A	N/A	[Not Assessed.]	<p>As this Element was not assessed separately in 2016, no RMP baseline RAG-status exists. However, the Keeper's Assessment Team can agree that the Water Industry Commission for Scotland, while being aware of their responsibilities under this element, are probably not affected by the third-party clause. If you would like more information around this please contact public_records@nrscotland.gov.uk.</p>	N/A	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 25th March 2025.

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

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 various elements in the authority's plan continue to be properly considered. The Assessment Team commends this authority's efforts to keep its Records Management Plan under review.

General Comments

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.

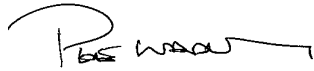
The Keeper cannot change the status of elements formally agreed under a voluntary submission, but he can use such submissions to indicate how he might now regard this status should the authority choose to resubmit its plan under section (5)(6) of the Act.

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