

The Public Records (Scotland) Act 2011

Redress Scotland

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

4th July 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 Redress Scotland. The outcome of the assessment and relevant feedback can be found under sections 6 – 8.

4. Authority Background

Redress Scotland is the independent body which makes decisions about applications to Scotland's Redress Scheme. Its values are respect, dignity and compassion, and its approach is based on honesty and clarity.

Redress Scotland was set up following an act passed by the Scottish Parliament in 2021, called Redress for Survivors (Historical Abuse in Care) (Scotland). Although Redress Scotland works with guidance and funding from the Scottish Government, it is not part of any Government department. The team at Redress Scotland is made up of panel members, who make decisions about applications; board members, who oversee the running of the organisation; and employees. Redress Scotland is led by a Chair and a Chief Executive.

If you apply for redress in Scotland, your application is made to the Scottish Government, who will make a payment if the application is successful. It is the job of Redress Scotland to tell the Government which people should get redress, and how much any payment should be.

[Redress Scotland – Survivors are at the heart of the Redress Scotland process](#)

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)

Redress Scotland

Element	Status of Elements under Agreed Plan 05JUL23	Status of Evidence under Agreed Plan 05JUL23	Progress Review Status 04JUL25	Keeper's Report Comments on Authority's Plan 05JUL23 Full Agreement Report at https://www.nrscotland.gov.uk/files/record-keeping/public-records-act/NRS - Public Records %28Scotland%29 Act %28PRSA%29 - Redress Scotland - Agreement Report Web Version - 05 July 2023.pdf	Self-assessment Update as submitted by the Authority since 05JUL23	Progress Review Comment 04JUL25
1. Senior Officer	G	G	G	Update required on any change.	No change	No immediate action required. Update required on any future change.
2. Records Manager	G	A	G	It has been confirmed separately that the <i>Records Management Competency Framework</i> now reflects the updated roles and responsibilities and was approved by the Audit and Risk and Assurance Committee (ARAC) in January 2023. The Keeper requests an up-to-date version of this document. The annual, voluntary Progress Update	Alan Henderson undertook Records Management training in November 23 provided by Tkm Consulting. Rebecca Wagstaff out Knowledge and Research Lead, also a member of the Policy and Improvement Team, undertook Records Management Training in November 23 provided by Tkm Consulting. Our revised Records Management Competency Framework has been updated and the revised version is attached to the e-	Thank you for this update. The extensive training undertaken by the Redress Scotland team has been noted. TKM Consulting are well known to the Keeper's PRSA Implementation Team and are appropriate to lead training on records management in the Scottish public sector.

			<p>Review (PUR) mechanism can be used to provide this. [...]</p> <p>The Keeper requires evidence to demonstrate the Policy and Improvement Lead, Alan Henderson, has the same access to resources and skills. For example, a commitment to undertaking the same or similar records management training as outlined above. The Keeper acknowledges that the post-holder will not yet have had the opportunity to undertake such training. The Keeper also acknowledges the clear commitment to supporting staff in accessing training.</p> <p>The Keeper can agree this element under 'improvement model' terms. While the Policy and Improvement Lead has now been appointed and identified as having day-to-day responsibility for records management, further evidence is required to support this. For example, a commitment to undertaking the same or similar records management training outlined above. An updated version of the <i>Records Management Competency Framework</i> is also required.</p>	<p>mail accompanying this PUR template.</p> <p>Our updated records management plan has also been attached.</p> <p>And a further supporting e-mail from our Chief Executive from summer 2023</p>	<p>The Keeper's PRSA Implementation Team acknowledges receipt of Redress Scotland's Records Management Competency Framework document and the latest versions of the Records Management Plan and Policy. These will be held on the relevant case file to allow the Keeper to keep the original submission up-to-date.</p> <p>The training described here and RM competency framework marks a measurable improvement in the records management provision in the authority.</p> <p>If this were a formal re-submission, it is likely that this element of the Plan would turn from Amber to Green.</p>
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3. Policy	G	G	G	Update required on any change.	No change	No immediate action required. Update required on any future change.
4. Business Classification	A	G	A	<p>The <i>RMP</i> states that current file plan was developed in the early stages of Redress Scotland. Now the authority is fully operational a review of the business classification scheme (file plan) is planned to ensure it meets business needs and best reflects the functions of the authority. The authority intend to consult local business areas as part of this review. It has been confirmed separately that this work is now underway in one business area with others to follow later in 2023. The Keeper commends the planned action to revisit the file plan now the authority is more established and the commitment to undertake this work. Updates can be provided on progress through the PUR process.</p>	<p>To date the Policy and Improvement team have undertaken a review of their file plan and files. These have been amended and updated to appropriately reflect the work of the team.</p> <p>The People team undertook their own review into their file plan following a training session provided by the Head of Policy and Improvement to the team during summer 2023.</p> <p>There are currently some barriers in place to action the changes needed by the People team and this is actively being worked on with the SG KIM team. This will continue to be actively worked on and progressed.</p> <p>New HR system is being introduced which has negated further work on eRDM files within People Team.</p> <p>The current business classifications are working for the finance and operational areas. No further review required at this time.</p>	<p>As noted in the Keeper's original agreement Redress Scotland is developing its file plan by liaising with local business areas. Although this may make the project slower the advantages of this local engagement are considerable. It is noted that progress has been good but the project is not quite completed.</p> <p>As Redress Scotland is currently in a 'developing' period the Keeper would probably be content to retain the improvement model 'amber' status of this element. It is important to note that the current 'amber' grading does not indicate a concern around the record management provision in the authority. In fact, the PRSA Implementation Team judges that, if appropriately implemented, the new fileplan will represent an improvement in record keeping in the organisation.</p>

5. Retention Schedule	G	G	G	Update required on any change.	No change	No immediate action required. Update required on any future change.
6. Destruction Arrangements	G	G	G	Update required on any change.	No change	No immediate action required. Update required on any future change.
7. Archiving and Transfer	A	G	A	<p>Redress Scotland are in the process of engaging with the NRS Client Management Team to put in place a formal deposit agreement which will govern the arrangements for the transfer of records for permanent preservation. [...]</p> <p>The Keeper can agree this element under ‘improvement model’ terms as a formal in agreement is not yet in place but is being actively worked towards. This agreement is dependent on the Keeper’s assessment team being updated on progress and provided with a copy of the deposit agreement once it is place.</p>	<p>In progress engaging with National Records of Scotland (NRS) Client team to put in a formal archiving and transfer agreements. It had been agreed with the NRS team that once all work had been completed on Element 4 the work on archiving and transfer agreements can be completed.</p> <p>There is no further work to be undertaken on business classification, therefore, information on our business classification and files has been exchanged with NRS in summer 24. We are currently finalising work on the archiving and transfer agreements</p>	<p>The PRSA Implementation Team are aware of the ongoing discussions around the permanent preservation of a small selection of the records generated by Redress Scotland.</p> <p>This element remains graded with an amber ‘improvement model’ rating until these negotiations are concluded.</p>
8. Information Security	G	G	G	Update required on any change.	No change	No immediate action required. Update required on any future change.
9. Data	G	G	G	Update required on any change.	No change	No immediate action required. Update required on

Protection						any future change.
10. Business Continuity and Vital Records	A	A	A	<p>Redress Scotland are in the process of developing business continuity plans and processes. Copies of a <i>Draft Business Continuity Plan</i> and a <i>Draft Operational Continuity Plan</i> have been provided. Section 4 of the <i>Draft BCP</i> summaries the SG business continuity arrangements and includes a statement noting it has been confirmed that any systems in use by Redress Scotland are covered by SG arrangements. These documents are due to be further developed and to go through the approval process in the first quarter of 2023. The Keeper wishes to be notified when this document is finalised and provided with a copy. This can be done through the PUR mechanism. [...]</p> <p>The Keeper can agree this element under ‘improvement model’ terms as Redress Scotland are in the process of developing and finalising their business continuity planning and processes. This agreement is dependent on the Keeper being updated on progress. The Keeper acknowledges that all</p>	<p>A business continuity policy and plan were previously presented to the Oversight Board in the first quarter of 2024. Feedback on these documents highlighted the need to simplify both the policy and the plan, in order to develop a more straightforward approach that could be shared across the organisation.</p> <p>Further work has been completed on these documents, however there was recognition that business continuity planning would benefit significantly from testing with team, panel and board members. The Annual General Meeting on the 7th of November included work on scenarios where there were significant cyber security and business continuity challenges.</p> <p>Further work is required to fully develop this policy and associated training with playbooks of the most common scenarios. A working group has been established to progress this work and bring back to the board in the first quarter of 2025.</p>	<p>Thank you for this detailed update on progress against this important issue.</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 Redress Scotland will pursue this training regularly.</p> <p>This element remains graded with an amber RAG status until the Board has approved the Business Continuity Arrangements and they have been rolled-out to staff.</p> <p>The Assessment Team look forward to further updates in subsequent PURs.</p>

				systems in use by Redress Scotland are covered under the business continuity arrangements of the Scottish Government.		
11. Audit Trail	G	G	G	Update required on any change.	No change	No immediate action required. Update required on any future change.
12. Competency Framework	G	A	G	<p>The <i>RMP</i> indicates a clear commitment to supporting staff in records management training and attending courses. As noted at element 2, three members of staff with specific records management responsibilities have completed or are in the process of completing external training. The Keeper is confident Mr Henderson, Policy and Improvement Lead (named at element 2), will receive similar support in undertaking records management training. As noted at element 2, evidence to demonstrate this, when available, can be provided to the Keeper through the PUR process.</p> <p>Redress Scotland have developed a <i>Records Management Competency Framework</i>, a copy of which has been provided. It outlines the expected competencies of the</p>	<p>Alan Henderson undertook Records Management training in November 23 provided by Tkm Consulting.</p> <p>Rebecca Wagstaff out Knowledge and Research Lead, also a member of the Policy and Improvement Team, undertook Records Management Training in November 23 provided by Tkm Consulting.</p> <p>Our revised Records Management Competency Framework has been updated and the revised version is attached to the e-mail accompanying this PUR template.</p> <p>Our revised records management policy has been attached too.</p> <p>And a further supporting e-mail from our Chief Executive from summer 2023</p>	<p>The Keeper expects staff creating, or otherwise processing records, to be appropriately trained and supported.</p> <p>There are repeated examples in this PUR that show this aspect of records management provision is properly considered by Redress Scotland</p> <p>For example the TKM Training explained against element 2.</p> <p>If this were a formal re-submission it is likely that this element of the Plan would turn from Amber to Green.</p>

				<p>Corporate Records Manager, which include working towards gaining a professional qualification in information and records management. The Keeper commends the development of this document. As noted at element 2, it has been confirmed separately that this document has been updated to reflect the changes in staffing since submission. A copy of the updated document has been requested. [...]</p> <p>The Keeper agrees that Redress Scotland consider information governance training for staff as required. The Keeper is confident that the individual identified at element 2 will be supported in training as demonstrated for other staff with records management responsibilities. This agreement is under ‘improvement model’ terms as the newly appointed Policy and Improvement Lead has not yet had the opportunity to complete training. Evidence of such training can be provided through the PUR mechanism.</p>		
13. Assessment and Review	G	G	G	Update required on any change.	No change	No immediate action required. Update required on any future change.

14. Shared Information	G	A	G	<p>A copy of a <i>Data Sharing Agreement with the Scottish Government</i> (dated May 2023) has been provided separately. Section 7 outlines the process for sharing. The <i>RMP</i> (page 18) states it is the intention that this document will be adapted by staff to suit the specific data sharing needs as required. It has been confirmed separately that the Agreement supports a Data Sharing Policy. This Policy is in the process of being signed-off by the Scottish Government. The Keeper wishes to be provided with a copy of this Policy once it is finalised. The PUR mechanism can be used to provide such updates.</p> <p>A Framework document setting out the relationship between the SG and Redress Scotland has also been supplied. It has been confirmed separately that this document is currently with SG colleagues for agreement. The Keeper wishes to be notified once it has been agreed. The PUR mechanism can be used to provide such updates. [...]</p> <p>The Keeper agrees that Redress Scotland considers records governance when</p>	<p>Data sharing agreement finalised and signed off by Scottish Government and Redress Scotland. Copy of data sharing agreement attached to the covering e-mail. Link to supporting privacy notice POLICY.SurvivorPrivacyNotice.FINAL_.20240207.pdf and related DPIA has been attached to the covering e-mail too.</p> <p>Framework agreement finalised and signed off by Scottish Government and Redress Scotland. Link to Redress-Scotlands-Framework-Document.pdf</p>	<p>Thank you for confirming that that information sharing with other bodies or individuals is appropriately controlled and that records management is properly considered. The PRSA Implementation Team acknowledge that evidence, including an example of data sharing agreement has been provided.</p> <p>If this were a formal resubmission it is likely that the Keeper would be able to agree that Redress Scotland properly considers records governance when undertaking information sharing programmes. Therefore, this element would achieve a Green 'compliant' RAG status.</p>

				undertaking information sharing programmes. This agreement is however under 'improvement model' terms. The Keeper requires confirmation that the Data Sharing Policy and Framework document are signed-off and operational before she can fully agree this element.		
15. Records Created or Held by Third Parties	N/A	N/A	N/A	The <i>RMP</i> (page 9) states "Redress Scotland do not have any third parties who carry out any functions of Redress Scotland that would involve the creation of record and the holding of records." The Keeper accepts this statement and expects to be informed if this situation should change in the future.	No change	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 13th March 2025. The progress update was submitted by Mel Lowe, Head of Policy and Improvement.

The progress update submission makes it clear that it is a submission for **Redress Scotland**.

The Assessment Team has reviewed Redress 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

Redress 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.

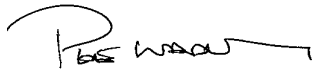
The Keeper cannot change the status of elements formally agreed under a voluntary submission, but he can use such submissions to indicate how he might now regard this status should the authority choose to resubmit its plan under section (5)(6) of the Act.

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

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