

**The Public Records (Scotland) Act 2011**

**David MacBrayne Ltd**

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

**22<sup>nd</sup> January 2021**

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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 David MacBrayne Ltd. The outcome of the assessment and relevant feedback can be found under sections 6 – 8.

#### 4. Authority Background

David MacBrayne Limited, which is wholly owned by Scottish Ministers, is the parent company of the David MacBrayne Group. The Group's principal subsidiary is CalMac Ferries Limited, which operates the Clyde and Hebrides ferry services. In addition, the passenger-only Gourock/Dunoon ferry service is operated by another subsidiary, Argyll Ferries Limited. These services are provided under public service contracts with the Scottish Government, for which a grant is received.

<http://www.david-macbrayne.co.uk/>

**N.B. The schedule to the Public Records (Scotland) Act 2011 lists the Scottish public authorities that are required to submit records management plans for the Keeper of the Records of Scotland's agreement. The schedule is very specific that the authority in this case is David MacBrayne Ltd (registered number SC015304). Technically the Keeper's agreement is with the business that has that registration number not with CalMac Ferries or Argyll Ferries or any part of the David MacBrayne Group that has a separate company registration. For the purposes of the RMP assessment this technicality will be ignored. The comments below should be taken to refer to the plan in its entirety and to all organisations covered by that plan.**

#### 5. Assessment Process

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

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

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

#### Key:

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

Element	Status of elements under agreed Plan 21JUL15	Progress assessment status 29AUG18	Progress assessment status 16JAN20	Progress assessment status 22JAN21	Keeper's Report Comments on Authority's Plan 21JUL15	Self-assessment Update 10OCT19	Progress Review Comment 16JAN20	Self-assessment Update as submitted by the Authority since 16JAN20	Progress Review Comment 22JAN21
1. Senior Officer	G	G	G	G	Update required on any change.	No change since August 2018.	No immediate action required. Update required on any future change.	No change since October 2019	No immediate action required. Update required on any change.
2. Records Manager	G	G	G	G	The authority is currently unable to supply a job description or person specific objectives for the individual named in this element. The authority is taking steps to rectify this situation (see Element 12) and should notify the Keeper once these are in place.	No change Since August 2018.	No immediate action required. Update required on any future change.	Job description and person specification have been produced.	The Keeper's Assessment Team thanks David MacBrayne Ltd for this update. They acknowledge the receipt of a new Records Manager Role Profile and note that it includes (among other duties) responsibility to: <ul style="list-style-type: none"> <li>• Develop and maintain a Records Management Plan ("RMP") in accordance with the PRSA recommendations, ensuring all relevant elements are completed.</li> <li>• Develop and maintain the Corporate Records Retention Schedules.</li> <li>• Provide records management advice and support</li> <li>• Overseeing the management of the on-site records storage facility.</li> <li>• Develop and maintain a formal relationship with the National Records of Scotland.</li> </ul> <p>This document will be retained in order to keep the David MacBrayne submission up-to-date.</p>
3. Policy	G	G	G	G	Update required on any change.	No change Since August 2018.	No immediate action required. Update required on any future change.	Records Management Policy has been reviewed and updated. It is being put forward for corporate approval.	In their original submission David MacBrayne Ltd committed to keeping their information governance policies and guidance documents under review and the Assessment Team acknowledges that this is being done.
4. Business Classification	A	A	G	G	A full information audit is being conducted in order to develop a robust business classification by	A Business Classification document has been developed. It is understood that this	In their original submission David MacBrayne indicated that they were working	No change since October 2019.	No immediate action required. Update required on any change.

				<p>late 2015. The Keeper commends this decision and the inclusion of different service areas in the development of the business classification. The authority is committed to this action and will inform the Keeper of progress.</p> <p>The Keeper agrees this element of David MacBrayne's RMP on 'improvement model' terms. This means that he acknowledges that an authority has recognised a gap in records management provision and has set in motion projects designed to close that gap. The Keeper will expect to be updated on the progress of these projects.</p>	<p>document will remain fluid and subject to regular change due to the changing nature of the Company's business. It is based on the model created by the RMS.</p>	<p>towards creating a Business Classification Scheme. The Assessment Team are pleased to acknowledge that this has now been done.</p> <p>The achievement of this objective marks a measurable improvement in the records management provision in the authority.</p> <p>The Assessment Team acknowledge the receipt of the <i>David MacBrayne Group Business Classification Scheme</i>. This document will be retained in order that the authority's submission can be kept up-to-date.</p> <p>If this was a formal re-submission, which David MacBrayne can do at any time under section 5 of the Act, it is likely that this element of the Plan would turn from Amber to Green.</p> <p>PRSA says at section 5.6 "An authority may at any time revise its records management plan and submit the revised plan to the Keeper for agreement."</p> <p>If DML is considering a formal re-submission please contact the assessment team to discuss what evidence would need to be supplied  <a href="mailto:public_records@nrscotland.gov.uk">public_records@nrscotland.gov.uk</a> We will fully engage and support a section 5 re-submission. Happy to talk through the process at any time.</p>		
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5. Retention Schedule	A	A	G	G	<p>The Keeper has received a strong indication that progress is underway in identifying retention schedules and developing schedules through a full information audit. The Keeper welcomes the authority's commitment to developing a comprehensive retention schedule and submitting regular updates on the progress of this work.</p> <p>The Keeper agrees this element of David MacBrayne's RMP on 'improvement model' terms. This means that he acknowledges that an authority has recognised a gap in records management provision [lack of formal retention schedules] and has set in motion projects designed to close that gap. The Keeper will expect to be updated on the progress of these projects.</p>	<p>The Records Retention Schedule has been completed. Similarly to the Business Classification Scheme it is understood that this document remains fluid and is subject to change on a regular basis, as the make up of the company and requirements change.</p> <p>Future development: It is intended to look into the possibility of amalgamating the Business Classification Scheme and the Records Retention Schedule into one document.</p>	<p>The Keeper agreed the original David MacBrayne Records Management Plan on an improvement model basis partly on the grounds that the authority did not have operational retention schedules throughout the business. He was convinced that processes were in place to remedy this. The Assessment Team is pleased to acknowledge that the authority now appears to be compliant in this element.</p> <p>The achievement of this objective marks a measurable improvement in the records management provision in the authority.</p> <p>The Assessment Team acknowledge the receipt of the <i>David MacBrayne Group Records Retention Schedules</i>. This is the version dated September 2018. This document will be retained in order that the authority's submission can be kept up-to-date.</p> <p>There is a recognition that a retention schedule is a 'living document' and will be subject to continual minor change year on year.</p> <p>The Assessment Team notes that the authority is considering amalgamating the Business Classification Scheme and the Retention Schedules</p>	<p>The Records Retention Schedules continue to be operational and are amended as and when required.</p>	<p>As under element 3 above, this is evidence of a commitment to keep information governance documentation under review.</p> <p>It is also a recognition by the authority that a retention schedule is a 'living document' and will be subject to continual minor change year on year.</p>
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						<p>in to a single combined document. This would be the bones of an Information Asset Register and is therefore liable to be a stronger business tool for DML. The Keeper is likely to commend this action if pursued.</p> <p>As with element 4 above, if this was a formal re-submission it is likely that this element of the Plan would turn from Amber to Green.</p>			
6. Destruction Arrangements	A	G	G	G	<p>David MacBrayne is in the process of creating a <i>Records Disposal Policy</i> which will cover the irretrievable destruction of electronic records. This policy will be made available to all staff on the 'Gangway' intranet. It is important that this policy is forwarded to the Keeper at the first available opportunity.</p> <p>The Keeper can agree this element under 'improvement model' terms on the condition that David MacBrayne supplies him with the <i>Records Disposal Policy</i> as soon as it is operational.</p>	No change since August 2018.	No immediate action required. Update required on any future change.	A Records Retention and Disposal Policy has been produced. It is being put forward for corporate approval.	<p>The Keeper's Assessment Team thanks David MacBrayne Ltd for this update. They acknowledge the receipt of a new Records Retention and Disposal Policy Version Number: DV2 Draft B. This will be retained on file in order to keep the David MacBrayne Ltd submission up-to-date.</p> <p>As with other elements, this is an example of progress towards compliance and towards more robust records management provision in the authority.</p> <p>The Keeper agreed the original David MacBrayne Records Management Plan on an improvement model basis partly on the grounds that the authority did not have a formal <i>Records Disposal Policy</i>. He was convinced that processes were in place to remedy this. The Assessment Team is pleased to acknowledge that the authority now appears to be almost compliant in this element (awaiting corporate approval).</p> <p>If this was a formal re-submission it is likely that this element of the Plan would turn from Amber to Green.</p>

7. Archiving and Transfer	A	G	G	G	<p>David MacBrayne has identified the National Records of Scotland as the repository for records of permanent value. A Memorandum of Understanding (MoU) is currently being negotiated at the time of assessment. The Keeper welcomes this approach and requests a copy of the MoU once signed.</p> <p>The Keeper agrees that David MacBrayne have identified a suitable repository for the permanent preservation of selected records. He can agree this element under 'improvement model' terms. This means that he accepts that the authority has identified a gap in provision (no formal agreement with the archive) and have put processes in place to close that gap. His agreement is dependent on the approved MoU being provided when available.</p>	No change since August 2018.	No immediate action required. Update required on any future change.	No change since October 2019.	<p>No immediate action required. Update required on any change.</p> <p>The Assessment Team acknowledges receipt of a copy of the Memorandum of Understanding with NRS. This will be retained to keep the David MacBrayne submission up-to-date.</p>
8. Information Security	G	G	G	G	Update required on any change.	No change since August 2018.	No immediate action required. Update required on any future change.	Information Security Policy has been reviewed and updated.	As with other elements, this is an example of a clear commitment to keeping information governance documents under review. This is to be applauded.
9. Data Protection	G	G	G	G	<p>David MacBrayne have committed to publish subject access information on their website and to inform the Keeper when this has been done. The Keeper thanks the authority for this consideration.</p> <p>The Keeper welcomes the commitment to provide training to staff to make them aware of their responsibilities in dealing with personal data. The Keeper would be</p>	No change since August 2018.	No immediate action required. Update required on any future change.	The Data Protection Policy has been reviewed and updated.	As with other elements, this is an example of a clear commitment to keeping information governance documents under review. This is to be applauded.

					interested in hearing news of this training.				
10. Business Continuity and Vital Records	A	A	A	A	<p>A <i>Corporate Business Continuity Plan</i> and a <i>Vital Records Policy</i> are currently being developed and are expected to be in place in 2015. The Keeper commends this effort to close a gap in provision and requests that he is provided with a copy of these policies, once available.</p> <p>The Keeper agrees this element of David MacBrayne's RMP on 'improvement model' terms. This means that he acknowledges that an authority has recognised a gap in records management provision [vital records not included in recovery plans] and has set in motion projects designed to close that gap. The Keeper will expect to be updated on the progress of these projects.</p>	<p>A Vital Records Policy has been created. Business Continuity Plans have been produced for each department, listing the records considered vital for each department.</p>	<p>In their 2018 PUR David MacBrayne Ltd indicated that a Vital Records Policy was being created. This was being done in response to a recognised gap in provision regarding the lack of vital record recovery in the case of an emergency.</p> <p>At the time of the 2019 PUR this document has been created and is now being forwarded through the corporate governance structure to be approved.</p> <p>When the Vital Records Policy is approved and operational this will represent a clear improvement in records management provision and the Keeper with acknowledge this. It is likely that this element of the Plan would turn from Amber to Green. Until the Policy has been approved by Senior Management ('SMM') the element remains at Amber.</p> <p>The Assessment Team acknowledge the receipt of the <i>Vital Records Policy</i> This is the Draft version DV2. This document will be retained in order that the authority's submission can be kept up-to-date.</p>	<p>The Vital Records Policy has been reviewed and updated. It is being put forward for corporate approval.</p>	<p>When the Vital Records Policy is approved and operational this will represent a clear improvement in records management provision and the Keeper with acknowledge this. It is likely that this element of the Plan would turn from Amber to Green. Until the Policy has been approved by Senior Management the element remains at Amber.</p> <p>A draft version of the Vital Records Policy is held by the PRSA Team in the David MacBrayne file having been submitted in 2019.</p>
11. Audit Trail	A	A	A	A	<p>David MacBrayne recognise that it does not have a corporate system in place which allows the tracking of records. However the authority</p>	<p>There is currently no corporate system in place to allow the tracking of records. However, there are elements being</p>	<p>The Keeper agreed the original submission on 'improvement model' grounds. That is to say the authority had recorded a gap in</p>	<p>An audit trail FAQ document has been developed. This is likely to be a fluid document and more questions will be added as they arise.</p>	<p>It is noted that this element remains at Amber. However, the Assessment Team also notes that at the time of the last PUR we said "The creation and roll-out of staff guidance would</p>

					<p>hopes to implement audit trail facilities by late 2015 as part of the roll-out of the Business Classification Scheme and Retention Policy. There is a commitment to keep the Keeper up-to-date on the progress of this project, which is welcomed.</p> <p>The Keeper agrees this element of David MacBrayne's RMP on 'improvement model' terms. This means that he acknowledges that an authority has recognised a gap in records management provision [difficulty tracking records] and has set in motion projects designed to close that gap. The Keeper will expect to be updated on the progress of these projects.</p>	<p>developed to help with the tracking of records. A Customer Relationship Management system has replaced our old complaints system. This allows us to log complaints and a trail of transactions. We also have a communities-based system, Gangway, which permits users to store and share records. Any changes to records are automatically logged. Version control for documents guidance is being developed for all users in the company. Finance have recently undertaken a project to standardise the filing system of electronic documents within their department. It is hoped that this can be developed in the other departments. A naming convention is being developed as is a company-wide data classification scheme. This will ensure documents are consistently titled and get the correct level of security.</p> <p>For paper based records, there is an on-site central records store for semi current records. There is a centrally held database which contains the location of each record and also logs any movement of records. A basic system of placing a sheet of paper into the box when a record is removed is also used.</p> <p>Access to the store is centrally logged, the keys being in the possession of the Records Manager.</p> <p>The keeper will be kept informed as this element develops.</p>	<p>provision and was taking steps to close that gap.</p> <p>This was bound to be incremental and the Assessment Team is pleased to acknowledge that steps have been taken as agreed.</p> <p>They are happy to recognise that certain line-of-business systems (such as the 'Customer Relationship Management' may have tracking built-in. Similarly he agrees that those records managed through an electronic document system such as 'Gangway' are likely to include tracking and version control.</p> <p>However, it is vitally important that staff correctly name records at time of creation for any system that does not impose this. Similarly, version control instructions are key.</p> <p>It is important that any organisation can be confident that they can find a record when required and identify the correct version of that record. The Assessment Team acknowledge that David MacBrayne are pursuing this objective. The creation of a clear structure (see element 4) is a significant step now completed.</p> <p>The creation and roll-out of staff guidance would seem to be the next vital step and the Assessment Team looks forward to</p>		<p>seem to be the next vital step and the Assessment Team looks forward to updates on progress in subsequent PURs."</p> <p>The Assessment Team notes that staff guidance has now been provided in the form of an FAQ document. This is welcomed.</p> <p>It is still not clear that staff are consistently naming public records in a manner that guarantees they can be located and the correct version identified. At the time of the last PUR a 'pilot project' was taking place in the Finance Department. The Assessment Team looks forward to an update on this project in a subsequent PUR.</p> <p>Similarly, David MacBrayne stated in 2019 "A naming convention is being developed as is a company-wide data classification scheme. This will ensure documents are consistently titled and get the correct level of security." This is a positive commitment and we look forward to further developments.</p>
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						updates on progress in subsequent PURs.  This element remains at Amber.			
12. Competency Framework	A	G	G	G	<p>David MacBrayne is committed to creating a <i>Competency Framework, Job Description or Person Specification</i> for their Records Manager. The Keeper commends this initiative and requests sight of these documents once they have been approved.</p> <p>The Keeper agrees this element of David MacBrayne's RMP on 'improvement model' terms. This means that he acknowledges that an authority has recognised a gap in records management provision [there is no formal job description or person specification for their Records Manager] but have committed to close that gap. The Keeper agrees this element on the understanding that he will be informed when the relevant documents have been approved.</p>	No change since August 2018.	No immediate action required. Update required on any future change.	A job description and person specification has been produced and approved.	<p>See element 2 above.</p> <p>The Keeper agreed the original David MacBrayne Records Management Plan on an improvement model basis partly on the grounds that the authority did not have a formal job description or person specification for their Records Manager. He was convinced that processes were in place to remedy this. The Assessment Team is pleased to acknowledge that the authority now appears to be compliant in this element.</p> <p>If this was a formal re-submission it is likely that this element of the Plan would turn from Amber to Green.</p> <p><b>As noted in the last PUR, You might consider a formal full resubmission as so many of your elements now appear to be compliant when they were originally amber.</b></p> <p><b>PRSA says at section 5.6 "An authority may at any time revise its records management plan and submit the revised plan to the Keeper for agreement."</b></p> <p><b>If DML is considering a formal re-submission please contact the assessment team to discuss what evidence would need to be supplied</b>  <a href="mailto:public_records@nrscotland.gov.uk">public_records@nrscotland.gov.uk</a>  <b>We will fully engage and support a section 5 re-submission. Happy to talk through the process at any time.</b></p>

13. Assessment and Review	A	A	G	G	<p>David MacBrayne is developing a strategy which will ensure the annual review of the Plan and its policies and for the continuity of policy review in the future. The Keeper commends this work and requests that he is informed if this policy review results in any changes and be provided with a new version. This must be done in order that the Keeper may keep David MacBrayne's submission up-to-date.</p> <p>The Keeper agrees this element of David MacBrayne's RMP on 'improvement model' terms. This means that he acknowledges that the authority has recognised a gap in records management provision (they need to create a formal review strategy and procedures) and has set in motion projects designed to close that gap. The Keeper will expect to be updated on the progress of these projects.</p>	<p>An assessment and review plan has been created which sets out the intention for the company to ensure the RMP is regularly reviewed and amended as required.</p>	<p>It is a requirement of the Public Records (Scotland) Act 2011 that "An authority must— (a) keep its records management plan under review" (PRSA Part 1 5.1.a.)</p> <p>Although David MacBrayne committed to do this in their original submission they had not developed a methodology by which these reviews would be carried out. The Keeper was happy to agree the element on an improvement model basis until this methodology could be agreed.</p> <p>The authority's participation in the PUR process in 2018 demonstrated a commitment to reviewing its RMP.</p> <p>The Assessment Team are now pleased to recognise that the authority has created a clear structure regarding review.</p> <p>The achievement of this objective marks a measurable improvement in the records management provision in the authority.</p> <p>The Assessment Team acknowledge the receipt of a statement regarding the review procedure to which the Records Management Plan will be subject. This statement will be retained in order that the authority's submission can be kept up-to-date.</p>	<p>No change since October 2019.</p>	<p>No immediate action required. Update required on any change.</p>
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							If this was a formal re-submission, which David MacBrayne can do at any time under section 5 of the Act, it is likely that this element of the Plan would turn from Amber to Green.		
14. Shared Information	<b>G</b>	<b>G</b>	<b>G</b>	<b>G</b>	Update required on any change.	No change	No immediate action required. Update required on any future change.	No change since 2019.	No immediate action required. Update required on any 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 8<sup>th</sup> October 2020. The progress update was submitted by Alan Redhead, Records Manager.

The progress update submission makes it clear that it is a submission for **David MacBrayne Ltd**.

The Assessment Team has reviewed David MacBrayne'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

David MacBrayne Ltd 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.

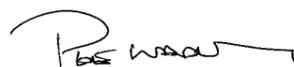
The Keeper cannot change the status of elements formally agreed under a voluntary submission, but he can use such submissions to indicate how he might now regard this status should the authority choose to resubmit its plan under section (5)(6) of the Act.

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

Based on the progress update assessment the Assessment Team considers that David MacBrayne Ltd 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