

The Public Records (Scotland) Act 2011

Board of Trustees of the Royal Botanic Garden, Edinburgh

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

30 July 2019

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1. Public Records (Scotland) Act 2011

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

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

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

2. Progress Update Review (PUR) Mechanism

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

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

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

3. Executive Summary

This Report sets out the findings of the Public Records (Scotland) Act 2011 (the Act) Assessment Team's consideration of the Progress Update template submitted for The Board of Trustees of the Royal Botanic Garden, Edinburgh. The outcome of the assessment and relevant feedback can be found under sections 6 – 8.

4. Authority Background

The Royal Botanic Garden Edinburgh (RBGE) was founded in the 17th century as a physic garden. Now it extends over four Gardens boasting a rich living collection of plants, and is a world-renowned centre for plant science and education. Royal Botanic Garden Edinburgh is a Non Departmental Public Body sponsored and supported through Grant-in-Aid by the Scottish Government's Environment and Forestry Directorate. It is governed by a Board of Trustees appointed by Scottish Ministers. This Board is the scheduled authority under the Public Records (Scotland) Act 2011.

The organisation comprises over 240 staff drawn from a variety of disciplines, contributing in many different ways to its overall objectives and functions. The Garden is organised into five areas: Science, Horticulture & Learning, Enterprise & Communications, Resources & Planning and Development.

RBGE is a registered charity.

<http://www.rbge.org.uk/>

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: Board of Trustees of the Royal Botanic Gardens, Edinburgh (RBGE)

Element	Status of elements under agreed Plan, 8 Sep 2014	Status of evidence under agreed Plan, 8 Sep 2014	Progress assessment status, July 2019	Keeper's Report Comments on Authority's Plan 08SEP14	Self-assessment Update as submitted by the Authority <u>since</u> 8 Sep 2014	Progress Review Comment, July 2019
1. Senior Officer	G	G	G	Update required on any change	Dr Alasdair Macnab left RBGE at the end of 2017. The Senior Officer is now Judy Cromarty, Head of Resources and Planning.	The Assessment Team thanks RBGE for this update which we have noted.
2. Records Manager	G	G	G	Update required on any change	No change. A Records Management Working Group, chaired by the Head of Resources and Planning, has been established and reports to the Senior Management Team meetings on a regular basis.	The establishment of a records management working group with access to senior management is to be commended. This should prove to be very useful going forward particularly when reviewing the implementation of the <i>Records Management Plan</i> .
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	A	A	<p>RBGE have supplied a draft Business Classification Scheme (BCS) based upon a functional approach. The 'Action Plan' indicates a commitment to further populate and roll-out the BCS with a target date for completion of December 2014.</p> <p>The Keeper commends the functional approach of the draft BCS and use of the SCARRS system for constructing the scheme. The Keeper recognises this authority's commitment to closing a gap in its provisions and welcomes the RMP's statement of intent to update the Keeper as progress continues.</p> <p>The Keeper agrees this element of RBGE's RMP on 'improvement model' terms. This means that he is convinced of the authority's commitment to implement the BCS fully over time, but would</p>	<p>In 2017 a pilot exercise was carried out in the Corporate Services division (HR, ICT, Estates Management and Finance) to look at the existing folder structure and map this to the BCS.</p> <p>The Department Heads were given an overview of the aims of the exercise and given time to familiarise themselves with the Records Management Plan. They were also tasked with gaining a clear understanding of the records that they held, where they were held and why. They were also advised to carry out a data cleansing exercise.</p> <p>Each Department also identified key staff to attend further workshops. These individuals knew the business area, had an awareness of previous records management activity and were familiar with the Division's strategic direction. They also had an understanding of how the</p>	<p>The Assessment Team thanks RBGE for this update which we have noted.</p> <p>Although the target date originally submitted for this work was missed, the PUR demonstrates clear steps forward in what was always going to be an incremental process.</p> <p>It is important to test the new, more controlled, structure in a pilot and this has been done.</p> <p>It is important to involve the separate business areas in the development of the structure as it applies to them locally. This has been done.</p> <p>It is important to use any migration to a new system (even if still using shared drives) as an opportunity to clear out redundant or orphaned information in a data cleansing exercise. This has been factored in.</p> <p>It is important to recognise the importance of staff training even if the basic software is not changing. This has been factored in.</p>
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				<p>request that he is updated as this project progresses.</p>	<p>Department's activities fit into the overall structure of the Division and the RBGE.</p> <p>Starting from the existing filing structures, the group of key staff mapped the folders across to the Functional levels of the RMP. The pilot was based around standard Microsoft architecture of mapped drives, folders and files. At the same time, where relevant, folders were re-named to accurately their content and folders that contained the same type of information were merged. The structure that the group produced was then created on our shared network and with the support of ICT we established appropriate levels of permissions for each area.</p> <p>A number of key lessons came out of the pilot:</p> <ul style="list-style-type: none"> - While time consuming, undertaking the review as a team provided 	<p>In summary, the Assessment Team considers that the information supplied in this update suggests a fundamental improvement in the records management provision in RBGE is underway. We look forward to further updates in subsequent PURs.</p> <p>The Assessment Team acknowledges the receipt of the RBGE Action Plan 2019 . This has been stored in order that the authority's submission might be kept up to date.</p>
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					<p>considerable benefits in terms of identifying all of the relevant records and areas of overlap;</p> <ul style="list-style-type: none">- Staff required support in terms of documentation and training in order to successfully undertake the changes to their existing working practices;- Issues were found in identifying items for review and destruction, as file attribute dates were not always appropriate for record keeping purposes;- Support from ICT was essential, particularly in relation to the effective management of permissions and linked files. <p>Based on the findings of this project a revised process for the updating of the BCS is now under development. Further review of the lower levels of the ICT records structure is also taking place.</p>	
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					In a recent data review it was confirmed that the core records relating to RBGE's Living Collection and Herbarium were securely stored in the existing collection management systems.	
5. Retention Schedule	A	A	A	<p>RBGE have supplied a draft Retention Schedule covering the functions outlined in the BCS. There is a commitment as part of the 'Action Plan' to further populate and roll-out this scheme with a target date for completion of December 2014.</p> <p>The authority will identify vital records and add these to the retention schedule during the creation of the Business Continuity Plan.</p> <p>The Keeper recognises this authority's commitment to closing a gap in its provisions and welcomes the RMP's statement of intent to update</p>	<p>A pilot exercise was carried out in the Corporate Services division to test the draft RRS. As a result a revised process for the updating of the RRS, including the identification of vital records, is now under development. We can confirm that the Record Retention Schedule (RRS) will be the definitive document. Our intention is to ensure that the RRS and our Information Asset Register are linked in such a way that updating relevant information in the RRS will automatically update the IAR. In this way we will ensure consistency between the two documents and staff will only need to update</p>	<p>As with element 4 above, there is clear evidence of progress regarding the development of retention decisions around record types. Again the original target date was missed, but the Assessment Team are happy to acknowledge that movement is now evident in this 'action'.</p> <p>RBGE is subject to GDPR/DP2018 and as such they have created an Information Asset Register for record types containing personal information. The information asset register will be linked to the retention schedule. The Assessment Team has noted that work in this area is ongoing and they look forward to being kept updated on this work in subsequent PURs.</p>

				<p>the Keeper as progress continues.</p> <p>The Keeper agrees this element of RBGE's RMP on 'improvement model' terms. This means that he is convinced of the authority's commitment to implement the retention schedule fully over time, but would request that he is updated as this project progresses.</p>	<p>information in one place. Discussions with our ICT team are ongoing in order to identify how we achieve this.</p> <p>As part of RBGE's preparation for the implementation of GDPR an Information Asset Register was developed. This included information on the retention period for each asset. This work will now be integrated with the revised RRS.</p>	
6. Destruction Arrangements	G	G	G	<p>The Keeper commends the provisions put in place by RBGE to properly destroy records in all formats. He would like to be kept up-to-date regarding both the planned review of the guidance for the management of electronic records and the authority's destruction procedures. He would also be interested in seeing the new staff training programme outlined under the Plan.</p>	<p>A copy of the staff training programme has been included with the Review documentation.</p>	<p>The Assessment Team thanks RBGE for this update which we have noted.</p> <p>It is good to recognise the importance of staff training especially in a sensitive area such as the controlled, secure and irreversible destruction of public records. The Assessment Team acknowledge the receipt of the authority's Records Management Training Programme. This has been stored in order that the authority's submission might be kept up to date.</p>

7. Archiving and Transfer	G	G	G	<p>The Keeper agrees RBGE's arrangements for the archiving of its public records but would be interested in hearing news of the commitment in the RMP to develop a policy around the archiving of electronic records.</p>	<p>An ongoing project, led by the Head of Resources and Planning, with support from the Head of ICT, is looking at potential systems to support the management of electronic records. This included a demonstration of the Laserfiche system in June 2018 and ongoing discussions with other Authorities regarding their local solutions.</p> <p>The space that is available for the processing and storage of paper records will be reviewed as part of a wider space audit that is due for completion by the end of March 2019.</p>	<p>RBGE archives records selected for permanent preservation in its own in-house archive.</p> <p>The Assessment Team notes the authority's comments regarding the permanent preservation of digital records. Digital archiving functionality is in very early stages in Scotland and the Assessment Team looks forward to updates in subsequent PURs.</p> <p>The Assessment Team acknowledges the provision on the RBGE Action Plan which shows work on the hard-copy archive in 2019/20.</p>
8. Information Security	G	G	G	<p>Update required on any change</p>	<p>No change.</p> <p>RBGE has undertaken a detailed assessment of cyber security. An action plan has been developed and additional resources allocated to deliver to set deadlines.</p>	<p>The Assessment Team thanks RBGE for this update and notes that there is a review of information security planned. They look forward to further updates around this review in subsequent PURs.</p>

9. Data Protection	G	G	G	Update required on any change	<p>No change.</p> <p>RBGE reviewed data protection arrangements in preparation for the GDPR requirements of May 2018. An Information Asset Register (IAR), which included the designation of Information Asset Owners (IAOs) was developed in order to achieve substantial improvement in the way personal data (and other information) is managed across the organisation. This required broad management buy-in and a visible prioritisation of the tasks. Allocating clear senior management ownership for each information system or records series provided accountability for decisions and for improvement in meeting actions and tasks.</p> <p>Given the breadth of senior managers' responsibilities, they couldn't be expected to have detailed knowledge of every information asset in their</p>	<p>As with all other Scottish public authorities, RBGE have been required to review and update their data protection procedures in light of the 2018 legislation. The Assessment Team acknowledges that the public facing website has been updated to account for this:</p> <p>https://www.rbge.org.uk/privacy-policy</p> <p><i>For Information Asset Register see element 5 above.</i></p> <p>It is good to recognise the importance of staff training especially in a sensitive area such as data protection. The Assessment Team notes that resources have been expended by the authority to ensure their staff are adequately trained.</p> <p>The Assessment Team notes that the GDPR requirements have prompted a review of records management provision generally and highlighted 'challenges'. This has been an unintended, but welcome, effect of GDPR for many Scottish public authorities</p>
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					<p>area of responsibility. They therefore had a choice to delegate the more detailed oversight by nominating Information Asset Administrators from among their staff who would support IAOs in the day-to-day oversight of a particular information asset.</p> <p>Our IAO role is accountable to our Senior Information Risk Owner (the Head of Resources and Planning), who serves as the senior champion of information assurance and provides leadership and visibility to related governance measures within the RBGE.</p> <p>Training workshops given by a GDPR consultant were given to all our IAO's and IAA's at an early stage in this process as we regarded it as essential to support staff through the process. Further open sessions were also done at a later date.</p>	<p>and the Team commend RBGE's candour in acknowledging their shortcomings here.</p> <p>Most of these should be addressed as part of the work described in elements 4 and 5 above. These remain at Amber until that work is completed. This element is specifically around compliance with data protection legislation and it is likely that, if this were a formal re-submission, the Keeper would consider RBGE still compliant (Green) on that issue.</p>
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					<p>A number of challenges were identified:</p> <ul style="list-style-type: none">- Some legacy systems not having the functionality to support the deletion of records at the end of the defined retention period or on request;- Shared network drives were seldom actively managed to delete life-expired documents, records and data, resulting in personal and other data being retained indefinitely;- Individual staff mail boxes were not time limited creating risk and significant costs in complying with FOI and subject access requests;- Manual records held beyond clearly identified retention <p>To address these challenges Information Asset Owners have been tasked with ensuring that retention policies</p>	
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					<p>are applied to the systems and information assets within their area of responsibility, and to ensure retention periods are applied to paper files regularly and timeously. IAO's were also asked to assess the capability of their relevant systems to delete life-expired records and, where this is not available, to identify actions to close that functionality gap at the earliest reasonable opportunity.</p> <p>An action plan to monitor and improve data compliance is ongoing (a recent progress report is included for information).</p>	
10. Business Continuity and Vital Records	A	A	G	<p>RBGE are currently in the process of creating a Business Continuity Plan. This Plan will identify vital records and provide information which will inform the retention schedule. The steps required to achieve this are clearly outlined in the</p>	<p>An ICT Business Continuity Plan was developed in association with the creation of a collections-focussed Major Incident Response Plan. These Plans will be updated to reflect the ongoing work on the Records Retention Schedule.</p>	<p>RBGE now have Business Continuity Plans for their digital and physical information assets.</p> <p>If this were a formal re-submission under section 5 of the Act, and evidence could be supplied, it is likely that the Keeper could consider turning the</p>

				<p>Action Plan which accompanies the RMP.</p> <p>The RMP commits the authority to introducing staff training in this area and the Keeper would welcome updates on this.</p> <p>Improvement of the recovery of critical business systems is a target for the ICT work plan 2012-2016.</p> <p>The Keeper agrees this element of RBGE's RMP on 'improvement model' terms. This means that he is convinced of the authority's commitment to implement a Business Continuity Plan and to identify vital records over time, but would request that he is updated as this project progresses.</p>	<p>Training to support both of these documents is planned for the 2019/20 financial year.</p>	<p>RAG status of this element from Amber to Green.</p>
11. Audit Trail	A	A	A	<p>RBGE recognise that there is a serious gap in provision regarding the tracking of records and the RMP states that the Garden's Senior</p>	<p>The project to develop and implement an effective audit trail for records was delayed.</p> <p>The Head of Resources and Planning, with support from</p>	<p>The Keeper's assessment Team notes that the target to develop an 'audit trail' (record tracking and version control) has slipped.</p>

				<p>Management Team is committed to developing and implementing an audit trail by the end of the 2014-2015 financial year. The Keeper requests an update on this project.</p> <p>The Keeper agrees this element of RBGE's RMP on 'improvement model' terms. This means that he is convinced of the authority's commitment to implement an audit trail over time, but would request that he is updated as this project progresses.</p>	<p>the RBGE Leadership team has committed to undertaking this work by the end of the 2019/20 financial year.</p>	<p>However, the work around the <i>Business Classification Scheme</i> (see element 4) and potentially the <i>Information Asset Register</i> (see element 5) should help considerably.</p> <p>For the systematic tracking of records two of the actions described in this PUR under element 4 will be vital:</p> <ol style="list-style-type: none"> 1. <i>The pilot was based around standard Microsoft architecture of mapped drives, folders and files. At the same time, where relevant, folders were re-named to accurately reflect their content and folders that contained the same type of information were merged.</i> 2. <i>Staff required support, in terms of documentation and training, in order to successfully undertake the changes to their existing working practices.</i> <p>While this work progresses this element of the RBGE Plan will remain at Amber.</p>
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						The Assessment Team looks forward to updates in subsequent PURs.
12. Competency Framework	G	G	G	The authority is committed to a training programme and the introduction of a records management 'stream' within the main training portfolio by the end of 2015. The Keeper would like to see these training programmes when they become available.	Records management was added to the job description for all staff. In addition, in 2019/20 line managers have been asked to ensure that all staff have one objective for the year that directly relates to records management. A copy of the staff training programme has been included with the Review documentation.	The Keeper would commend the inclusion of records management as a staff objective. At its most simple, standardised naming will greatly assist the authority's ability to locate records, which seems to be a weakness at the moment (see element 11). The Assessment Team acknowledge the receipt of the authority's Records Management Training Programme. This has been stored in order that the authority's submission might be kept up to date. Training in records management for all record creators is a positive step and to be applauded.
13. Assessment and Review	G	G	G	The Keeper welcomes RBGE's commitment to undertake self-assessments through the ARMS tool and regular, internal reviews and audits of the RMP and	The RBGE Senior Management Team review all RBGE policies and related documents on a regular basis.	In their original submission RBGE committed to updating relevant policy documents on a regular basis. The Assessment Team appreciates the confirmation that this is being done.

				<p>individual documents and policies including the Business Continuity Plan. The Keeper would like to receive updates on these reviews and requests that he be sent any updated policies such as a new Action Plan should these be amended following their review.</p>	<p>Following on from the Regius Keeper identifying records management as a priority for the 2019/20 financial year a revised Action plan was developed and has been included with the review documentation.</p>	<p>The completion of this Progress Update Review can also be considered as evidence of the commitment to review committed to in the original submission.</p> <p>The Assessment Team acknowledges the provision on the RBGE Action Plan which shows work on reviewing records management provision in 2019/20.</p>
14. Shared Information	A	A	N/A	<p>RBGE does not currently have an operational information sharing protocol but the need to close this gap in provisions is recognised by the authority and it is committed to creating a template information sharing protocol. The Action Plan sets a date for completion of January 2015. The Keeper requests sight of this template once created.</p> <p>The Keeper would also like sight of the standard data access agreement template noted in the RMP.</p> <p>The Keeper agrees this element of RBGE's RMP on</p>	<p>This element was subject to a detailed review at a recent Records Management Working Group meeting during which examples of current scenarios where information is shared (e.g. research projects, joint educational projects, etc) were discussed. As a result of that discussion we can now confirm that RBGE does not undertake routine information sharing with a third party and that the creation of a template Information Sharing Protocol is not required.</p> <p>Given that RBGE does a large amount of collaborative work</p>	<p>The Assessment Team notes that there was a commitment in the original submission to create an Information Sharing Protocol in 2015. At that time it was clearly thought that formal information sharing between RBGE and a third party or parties was being pursued.</p> <p>This element is specifically aimed at information sharing as part of the routine business of the authority such as Police Scotland traffic division regularly sharing information with Transport Scotland.</p> <p>It is not about occasional information sharing such as</p>

				<p>‘improvement model’ terms. This means that he is convinced of the authority’s commitment to implement a protocol for information sharing over time, but would request that he is updated as this project progresses.</p>	<p>the creation of a template Information Sharing Protocol was included in our records management plan as a "just in case" safeguard.</p> <p>Projects led by the Head of Resources and Planning in preparation for the implementation of GDPR and the potential impact of Brexit have identified all data that is held on behalf of other organisations by RBGE. A separate project, also led by led by the Head of Resources and Planning, is in progress to develop a Contracts Register.</p>	<p>responding to subject access requests.</p> <p>Similarly, it does not necessarily apply that if you hold records on behalf of a third party you are undertaking ‘information sharing’ in the manner this element considers.</p> <p>Also if the contracts mentioned are for services, again this element may not apply.</p> <p>In the light of the explanation given by RBGE, the Assessment Team agree that RBGE do not share information in a way that requires an Information Sharing Protocol and agree that is it likely that if this were a statutory review this Element would be recorded as N/A.</p>
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7. The Public Records (Scotland) Act Assessment Team's Summary

Version

The progress update submission which has been assessed is the one received by the Assessment Team on 19th March 2019. The progress update was submitted by Ms Lorna Mitchell, Head of Library, Archives & Publications.

The progress update submission makes it clear that it is a submission for **the Board of Trustees of the Royal Botanic Garden, Edinburgh**.

PRSA Assessment Team's Summary

The Assessment Team has reviewed the Board of Trustees of the Royal Botanic Garden, Edinburgh's progress update submission and agrees that the proper record management arrangements outlined by the fourteen elements in the authority's plan continue to be properly considered. The Assessment Team commends this authority's efforts to keep its Records Management Plan under review.

General Comments

The Board of Trustees of the Royal Botanic Garden, Edinburgh 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. If this were a statutory review, Assessment Team consider that it is likely that Element 14 would now be considered not applicable. There would be no change to the other Elements but the Assessment Team have noted that there is good progress being made in a number of Elements.

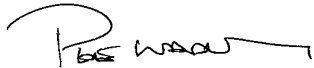
Where 'no change' has been recorded under the update on provision by the authority, the Assessment Team is happy to agree that these elements require no further action for the time being.

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

Based on the progress update assessment the Assessment Team considers that the Board of Trustees of the Royal Botanic Garden, Edinburgh 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