National Records of Scotland

PUBLIC RECORDS (SCOTLAND) ACT 2011

Report on the Progress Update Review (PUR) submitted by Scottish Canals on 25th June 2026

Preserving the past | Recording the present | Informing the future

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1. Progress Update Reviews (PUR)

Progress Update Reviews (PUR) are optional and allow named authorities to submit an update to the Public Records (Scotland) Act 2011 (PRSA) Implementation Team. They support the implementation of PRSA which promotes efficient and accountable record keeping by named Scottish public authorities. Visit the National Records of Scotland (NRS) website for up to date guidance on PURs. You can read more about the role of the PRSA Implementation Team on the National Records of Scotland website.

Please do not send evidence along with the PUR as it will not be considered.

Each Element is given a Red — Amber — Green (RAG) status rating as follows:

RAG status rating: Red

There is a serious gap in provision for this element with no clear explanation of how this will be addressed. If this were an RMP the Keeper may choose to return it, without agreement, on this basis.

RAG status rating: Amber

If this were an RMP the Keeper would consider agreeing this element under an 'improvement model'. This means that the Authority demonstrates an ongoing commitment to closing a gap in provision.

RAG status rating: Green

If this were an RMP the Keeper would consider agreeing this element of an authority's RMP.

The PRSA Implementation Team's review of the completed PUR template does not change the formal RAG status of an authority's agreed RMP Assessment Report.

2. Accessing Past Reports

Previous RMP assessment reports can be accessed as follows:

- Visit the National Records of Scotland (NRS) web archive for Records Management Plan Assessment Reports to December 2024. Then search for your authority's report by using the alphabetical table.

- Visit the NRS website for Records Management Plan Assessment Reports agreed after December 2024. On the left-hand side, under publication title, enter the name of your authority; under publications topic, select 'Records and archives'; under publications type, select 'Public Records (Scotland) Act').

If your authority has previously participated in PURs, finalised PUR reports can be accessed as follows.

- Visit the NRS web archive for Progress Update Review Reports to December 2024. Then search for your authority's report by using the alphabetical table.

- Visit the NRS website for Progress Update Review Reports after December 2024. On the left-hand side, under publication title, enter the name of your authority; under publications topic, select 'Records and archives'; under publications type select 'Public Records (Scotland) Act').

3. Progress Update on the Model Plan Elements

3.1 Element 1: Senior management responsibility

PRSA section 1(2)(a)(i) states that authorities must identify the individual who is responsible for management of the authority's public records. An individual senior staff member must be identified as holding corporate responsibility for records management.

RAG status rating: Green

3.1.1 Self-assessment Update

Senior officer has changed and this should be updated.

3.1.2 Progress Review Comments

In their 2017 agreed Records Management Plan Scottish Canals identified the Chief Executive, as having overall strategic responsibility for records management. At the time this was Steve Dunlop. Our records show that the CEO of Scottish Canals, and therefore the individual identified at element 01 of the Records Management Plan, is now John Paterson. The Keeper has previously determined that a change of personnel does not invalidate a Records Management Plan as long as the roles remain substantially similar. We have now revised your details on our contacts spreadsheet to show Mr Paterson as having overall responsibility for records management in the organisation.

3.2 Element 2: Records manager responsibility

Section 1(2)(a)(ii) of PRSA specifically requires a RMP to identify the individual responsible for ensuring the authority complies with its plan. An individual staff member must be identified as holding operational responsibility for records management and has appropriate corporate responsibility, access to resources, and skills.

RAG status rating: Green

3.2.1 Self-assessment Update

New Records Manager in place and therefore an update on role of is needed to reflect current responsibilities.

3.2.2 Progress Review Comments

Thank you for this update. We have now revised your details on our contacts spreadsheet to show the name of the new records manager. As with element 01 above, the Keeper has previously indicated that a change of an individual identified against a particular element of an RMP does not invalidate that RMP, provided that the role remains substantially similar.

3.3 Element 3: Records management policy statement

The Keeper requires each authority's plan to include a records management policy statement. The policy statement should describe how the authority creates and manages authentic, reliable and useable records, capable of supporting business functions and activities for as long as they are required. The policy statement should be made available to all staff, at all levels in the authority.

RAG status rating: Green

3.3.1 Self-assessment Update

RM Policy has been reviewed and updated. Will be published on NetConsent (Policy platform) shortly.

3.3.2 Progress Review Comments

Thank you for this update. In the Keeper's original agreement it was noted that Scottish Canals had indicated a process for ensuring that relevant information governance policies are kept under review. It is welcome to see confirmation that this is being appropriately pursued.

3.4 Element 4: Business classification

Records are known and are identified within a structure, ideally founded on function. The Keeper expects an authority to have properly considered business classification mechanisms and its RMP should therefore reflect the functions of the authority by means of a business classification scheme, information asset register or similar.

RAG status rating: Green

3.4.1 Self-assessment Update

A new version of the BCS has been created and all heads of Service/ appropriate staff have submitted comments. It will be published in due course.

3.4.2 Progress Review Comments

A business classification scheme is a living documents liable to change to reflect business needs. It appears that Scottish Canals understand this. The principle of involving local business areas in the development of the relevant parts of the business classification scheme is currently considered good practice. As well as sharing the workload, it is liable to reveal local record keeping anomalies potentially obscured from the central information governance team and to encourage business area buy-in.

3.5 Element 5: Retention schedules

The Keeper expects an authority to have allocated retention periods to its public records and for those records to be retained and disposed of in accordance with a retention schedule.

RAG status rating: Green

3.5.1 Self-assessment Update

Our retention schedule has been reviewed and is available on NetConsent.

Note that certain elements in regard to information technology-related retention is pending discussion and will be confirmed/enforced in the near future (i.e. Teams chats – groups/private; email; OneDrive; Copilot prompts, etc.).

3.5.2 Progress Review Comments

This element was previously agreed under ‘improvement model’ terms while the retention decisions on the record types created as Scottish Canals pursued their functions were reviewed. It appears from the PUR that this work is, with the exceptions noted above, complete. The achievement of this objective marks a measurable improvement in the records management provision in the authority.

If this were a formal re-submission, accompanied by compliance statements, and a copy of the schedule, could be provided, it is likely that this element of the Plan would turn from Amber to Green.

3.6 Element 6: Destruction arrangements

Records are destroyed in a timely and appropriate manner and records of their destruction are maintained. Section 1(2)(b)(iii) of PRSA specifically requires a RMP to include provision about the archiving and destruction, or other disposal, of an authority's public records.

RAG status rating: Amber

3.6.1 Self-assessment Update

Destruction of paper records continues to be implemented, and the policy has been reviewed.

Digital records are still a work in progress. Guidance is available to all staff as well as support from RM/ IM team.

SharePoint implementation is still WIP. A SharePoint-specific destruction guidance, incl. variations from Retention Schedule will be created (co-owned by Information Manager and ICT, rather than Records Manager at this stage). Updates will be made to RRS as required to reflect consistency.

3.6.2 Progress Review Comments

Along with many Scottish public authorities Scottish Canals is implementing M365 (SharePoint) as a records management solution.

This process is bound to take time to be rolled out properly and is embedded in staff business as usual procedures. It is important that M365 is implemented in a structured way and that the Scottish Canals retention decisions (see element 05) can be imposed on the SharePoint destruction processes.

PRSA Implementation Team will be interested to learn more as to how this implementation is progressing in subsequent PURs.

As Scottish Canals is currently in a 'transition' period the Keeper would probably be minded 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 Keeper judges that, if appropriately implemented, the M365 transition may represent an improvement in record keeping in Scottish Canals.

3.7 Element 7: Archiving and transfer arrangements

Records that have enduring value are permanently retained and made accessible in accordance with the Keeper's 'Supplementary Guidance on Proper Arrangements for Archiving Public Documents'. Section 1(2)(b)(iii) of PRSA specifically requires a RMP to make provision about the archiving and destruction, or other disposal, of an authority's public records.

RAG status rating: Green

3.7.1 Self-assessment Update

Transfer of archival records to NRS is currently unavailable due to lack space at NRS.

While we cannot deposit, we have kept a relationship with NRS and are awaiting their confirmation of an updated MOU. As part of this, we have requested that they take digitised records for items that cannot yet be physically archived there. This is pending agreement.

Semi current records will be moved to a new facility in 2027, and it is hoped this space will allow for the amalgamation of records from across the SC Estate.

3.7.2 Progress Review Comments

For the purposes of compliance with PRSA, Scottish Canals have identified a suitable archive repository and have developed a formal transfer agreement with that repository. Therefore this element retains is green RAG status. However, the PRSA Implementation Team have noted the challenges which the authority is facing with the pause on records intakes by the National Records of Scotland and the proposed mitigations which they are taking in response to the impact on their operations.

3.8 Element 8: Information security

Records are held in accordance with information security compliance requirements. An authority's RMP must make provision for the proper level of security for its public records. Section 1 (2)(b)(ii) states and authority's RMP must include provision about maintaining security of information contained in the authority's public records.

RAG status rating: Green

3.8.1 Self-assessment Update

Information Security Framework (incl. of Data Protection and related policies) has been updated with minor amendments, primarily around the formatting for improving readability and accessibility.

The Framework co-owned between Information Management and ICT; sub-policies and guidance are anticipated to be collaborative hereafter. These will reflect and mirror records management governance.

Training has been updated for all information security elements. It is primarily delivered through Knowbe4 and Vinciworkz platforms. Policies and guidance are based on NETconsent.

Additional one-off training is anticipated and required in support of SharePoint cloud migration.

Broader investment is required to support staff skills and confidence for technological advancements around digital working.

3.8.2 Progress Review Comments

As noted under element 03 above, it is important that an authority keeps its policy and guidance documents under review and it is welcome that Scottish Canals clearly does this.

This is particularly important around the area of information security. It is vital that an authority guarantees that it can react to changes in information security threat and that it has policies in place that ensure all the public records it manages are retained within appropriate security controls (for example by implementing specific training and collaborative policy development). It is clear from this PUR that the Scottish Canals understand this.

It is important that staff are trained on the authority's information security requirements and that this training is routinely repeated. Again, it seems clear that This authority is actively pursuing this principle.

3.9 Element 9: Data Protection

Records involving personal data are managed in compliance with data protection law. The Keeper will expect an authority's RMP to indicate compliance with its data protection obligations.

RAG status rating: Green

3.9.1 Self-assessment Update

These responsibilities sit with the Information Manager, who is the DPO and line manages the Records Manager. All policies, guidance and training for the related subject matter are updated in consideration of one-another.

Data Protection policies, guidance and training have been updated. The internal and external privacy notices are needing updated to reflect current RoPA.

A historical review of all data-related activities is required across the organisation.

Policy by Design has been integrated into checkpoints for ICT and Procurement processes. This is an ongoing effort and requires more assured integration into broader project and non-project work.

Stronger review and confirmation processes are required for contract renewals; updates to privacy notices (from project/activity owners); and periodic reviews/verification for historic processing.

AI developments and integration into many SaaS has increased pressures around recording, reviewing and recommendations for activities across the organisation.
Principles that follow the EU AI Act are broadly followed within internal Data Protection / AI Policy guidance. Updates to this are required.

Scottish Canals is currently confirming a Shared Service Agreement with Scottish Government that may facilitate this.

Improved by-function/department onboarding of responsibilities (i.e. line management, CCTV authorised persons, etc.) is required across the organisation. Likely overseen or managed by the People team in collaboration with the DPO.

There is an 8- week backlog for DPIA and related data protection advising due to resource (time) bottlenecks. All related activities (i.e. updating privacy notices, AI guidance, etc.) are being impacted by this.

3.9.2 Progress Review Comments

Thank you for this update. The comments have been noted.

Furthermore the PRSA Implementation Team note that Scottish Canals (as the British Waterways Board) is registered with the Information Commissioner as a Data Controller

They publish a privacy policy online. This includes details of service user's rights as a data subject.

This element is liable to retain its Green RAG status.

3.10 Element 10: Business continuity and vital records

An authority's business continuity arrangements should include the recovery of records made temporarily unavailable due to an unexpected event.

RAG status rating: Amber

3.10.1 Self-assessment Update

Vital Records, Business Continuity Planning and Information Asset Register creation/confirmation has not yet progressed. IAR and vital record identification are intended to be outsourced to Information Governance Consultants – these is at the initial stage in the procurement process.

3.10.2 Progress Review Comments

The PRSA Implementation Team are content that this element should retain its Amber Improvement Model rating awaiting vital records identification. However, if the work of the consultants is not completed at the time of Scottish Canal's next submission, perhaps we should look again as to whether the current situation is, in fact, compliant with the Keeper's expectations as to the provision for record recovery.

3.11 Element 11: Audit trail

The location of records is known and changes recorded.

RAG status rating: Amber

3.11.1 Self-assessment Update

Improvements for awareness and adherence to version control and ownership are required. While most policies and guidance do use some version controlling, records/asset ownership remains unmanaged and unreviewed. There is disparity across much guidance and policies, including storage locations (outwith formal compliance policies on NETconsent).

Improvements for assurance around policy compliance are underway, as overseen by the information Manager. This includes a review of all NETconsent records, and recommendations for accessibility, review of necessity and improvements for linking information and assuring continuity (ownership, updating, fit for purpose).

3.11.2 Progress Review Comments

Since the time of their last PUR, where a green RAG status was indicated, Scottish Canals have clearly come to the conclusion that processes for the efficient location and identification of records are not yet satisfactory. This recognition is commended. It is likely that the Keeper would currently grade this element of a RMP under improvement model terms. This means that the Authority demonstrates an ongoing commitment to closing a gap in provision. The PRSA Implementation Team look forward to further updates in subsequent PURs.

3.12 Element 12: Records management training for staff

Staff creating, or otherwise processing records, are appropriately trained and supported.

RAG status rating: Green

3.12.1 Self-assessment Update

Refreshed training has been made available for RM and other training programs.

The new RM in post also continues to attend conferences, webinars and training events.

Broader Information Security training is required for the Information Management department to ensure 'keeping up' with technologies. Limited time and staffing make this challenging outwith RM.

3.12.2 Progress Review Comments

The Keeper expects staff creating, or otherwise processing records, to be appropriately trained and supported.

There are repeated examples in this PUR that show this aspect of records management provision is properly considered by Scottish Canals. For example staff training on the use of the new SharePoint records management functionality being rolled-out and the recognition of further information security training mentioned above. The information governance training provision should be reviewed routinely to ensure that it is still appropriate. It seems clear that Scottish Canals understands this.

3.13 Element 13: Assessment and review

Records Management arrangements are regularly and systematically reviewed with actions taken when required. Section 5(1)(a) of PRSA says that an authority must keep its RMP under review.

RAG status rating: Green

3.13.1 Self-assessment Update

We have not a conducted a self-assessment for data protection processing, FOI/EIR compliance for several years.

3.13.2 Progress Review Comments

The comment above is noted and, as you might expect, the PRSA Implementation Team would strongly recommend that self-assessment (or external audit) of information governance processes is pursued regularly.

However, this element of the Keeper's Model Records Management Plan specifically refers to the review of the RMP itself.

Section 5(1)(a) of the Act says that an authority must keep its RMP under review.

At the time of the original agreement (2017) the Keeper agreed that Scottish Canals had made a firm commitment to review their RMP as required by the Act and have explained who will carry out this review and by what methodology.

The Keeper's PRSA Implementation Team welcome the authority's continued engagement with the Keeper's Progress Update Review (PUR) process.

3.14 Element 14: Shared information

Information sharing, both within the authority and with other bodies or individuals, is necessary, lawful, and controlled.

RAG status rating: Green

3.14.1 Self-assessment Update

No change

Commented [MM1]: Not sure what this refers to.

3.14.2 Progress Review Comments

No immediate action required. Update requested on any future change.

3.15 Element 15: Public records created by third parties

Adequate arrangements must be in place for the management of public records created and held by third parties who carry out any functions of the authority, see section 3 of PRSA.

RAG status rating: N/A

3.15.1 Self-assessment Update

No response

3.15.2 Progress Review Comments

As this Element was not assessed in 2017, no RMP baseline RAG-status exists. This Element will remain at ‘N/A’ until a formal resubmission takes place. However, the Keeper’s PRSA Implementation Team can accept that Scottish Canals are aware of their responsibilities under this element. as outlined in the Keeper’s Model Records Management Plan.

4. PRSA Implementation Team's Summary

The PRSA Implementation Team has reviewed Scottish Canal's PUR submission and recognises this authority's efforts to manage their records.

The PUR RAG status for each element is indicative only of the situation as outlined by the authority in the PUR. The PUR RAG statuses do not change the RAG status of elements that have been formally agreed by the Keeper in an RMP assessment report.

The PRSA Implementation Team recommends authorities consider publishing PUR reports on their websites as an example of continued good practice both within individual authorities and across the sector.