National Records of Scotland

PUBLIC RECORDS (SCOTLAND) ACT 2011

Progress Update Review (PUR) submitted by Mental Welfare Commission for Scotland on 15th May 2026

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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

Julie Paterson, Commission’s CEO remains the Senior Accountable Officer for the Commission and for the NCF records as well.

3.1.2 Progress Review Comments

The PRSA Implementation Team confirms that the CEO is identified as the senior staff member holding corporate responsibility for records management for the Commission. The information regarding the National Confidential Forum is noted, but this is not a separately scheduled public authority under the Act.

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

There have been no changes. The person responsible for the day-to-day records management is Paloma Alvarez, Commission’s Information Governance Manager.

3.2.2 Progress Review Comments

The PRSA Implementation Team confirms that the Information Governance Manager is identified as holding operational responsibility for records management in the Commission.

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

Our Records Management Policy is now updated biannually. The last version was approved in April 2026. The online training must be completed by staff every 2 years.

3.3.2 Progress Review Comments

Thank you for this update. In the Keeper's original agreement it was noted that the Commission 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

The first revision of the Business Classification Scheme was completed in June 2021. We are currently undertaking an extensive review involving all information asset owners and operatives to ensure it still offers a reliable description of the Commission's business areas and records. We are aiming to have the current version reviewed by the end of June 2026.

3.4.2 Progress Review Comments

Thank you for this update. It would appear that the Business Classification Scheme/Retention Schedule is operational and appropriately subject to review. The involvement of local business areas in the development of records management structures is commended as liable to highlight potential discrepancies and to encourage buy-in. If this were a formal re-submission, and suitable evidence (such as a snap-shot of the Business Classification Scheme/Retention Schedule) could be provided, it is possible that the RAG status of this element of the RMP could turn from Amber to Green.

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 policies and business classification scheme are merged in the same document, as explained in our response to element 4. The BCS is currently under revision.

In terms of their implementation and deletion of records, the Commission is currently implementing a new case management system which will offer a better solution for selecting files due for destruction and permanently delete them when the retention period has expired in the case management system. As part of the migration strategy, obsolete records have not been migrated to the new system.

3.5.2 Progress Review Comments

As the Commission's Retention Schedule and Business Classification Scheme are combined in a single document See our comments against element 4. For destruction see element 6.

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: Green

3.6.1 Self-assessment Update

Unchanged for the Commission regarding hard copies.

For hardware destruction the Commission has been using Computer Recycling Services Ltd.

3.6.2 Progress Review Comments

Thank you for this update. The Implementation Team notes that the Commission is implementing a new system which will offer a better solution for selecting files due for destruction and permanently delete them when the retention period has expired in the case management system (see compliance statement against element 5). The Team accepts that the arrangements for the controlled destruction of digital records, managed outside that new system, will remain as agreed in the 2014 RMP.

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

We have developed a new procedure to provide guidance on how to appraise Commission's records and identify records with historical value for their permanent preservation. Where permanent preservation is indicated, records will be considered for transfer to the National Records of Scotland (NRS).

Our website is also captured periodically by the NRS' web continuity service

The Commission also transfers key publications to the National Library Scotland under the Legal Deposit Libraries Act 2003 and the Legal Deposit Libraries (Non-Print) Regulations 2013.

3.7.2 Progress Review Comments

Thank you for this update.

NRS: The Keeper's PRSA Implementation Team would like to remind the Commission that they have been allocated a dedicated Client Manager in NRS who can be contacted at governmentrecords@nrscotland.gov.uk should you have any questions, regarding archiving arrangements, as you roll-out the new appraisal procedure.

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

The Commission reviews its policies periodically. Since the last PUR submission, the following relevant policies have been reviewed:

- Information Risk Management and IT code of conduct handbook for staff, October 2024.
- Data Protection Policy, February 2025
- IT Security Policy December 2025

All policies are published on the Commission's intranet. Compulsory readings are set and monitored by managers and reported on quarterly as part of the Commission's quality and performance reporting to ELT, Audit, Performance & Risk Committee and the Board.

The Cyber Essentials accreditation was renewed in December 2025. A pen test has been arranged.

A Cyber Incident Response plan is under development and near completion.

3.8.2 Progress Review Comments

As noted against element 3 above, it is important that an authority keeps its policy and guidance documents under review and it is welcome that the Commission 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 pursuing Cyber Essentials accreditation). It is clear from this PUR that the authority understands this.

The Implementation Team would like to remind the Commission that many of the recent information security breaches in the public sector stem from human error. It is therefore important that staff are trained on the authority's information security requirements and that this training is routinely repeated.

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

No major changes. Since the last PUR submission, the following policies have been reviewed:

- Data Protection Policy, February 2025
- Information Risk Management and IT code of conduct handbook for staff, October 2024
- Data breach Procedure, July 2024.
- DSAR procedure, February 2025.

All policies are accessible to all staff on the Commission's intranet. Compulsory readings are set and monitored as noted above.

For comments on training, see Element 12.

3.9.2 Progress Review Comments

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

Furthermore the PRSA Implementation Team note that the Commission 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: Green

3.10.1 Self-assessment Update

The business continuity policy, strategy, impact assessment and risk assessment documents are reviewed annually by the Head of Culture & Corporate Services. These documents are approved by ELT and the BCM Policy is approved by the Board. The latest versions have been approved by ELT and will be submitted to the June board for final approval.

Details of back-up software has been provided to the PRSA Implementation Team. We are in the last phase of the implementation of a new case management system.

We have finalised a cyber response plan (approved April 2026) which aligns to Scottish Government's Scottish Public Sector Cyber Incident Central Notification and Co-ordination policy.

3.10.2 Progress Review Comments

Thank you for this update.

The business continuity review and approval cycle has been noted.

The recovery of records made temporarily unavailable by an unexpected event is an integral part of the authority's business continuity planning.

Staff training is fundamental to the smooth recovery in an emergency (including record recovery). It is expected that the Commission pursues this training regularly.

3.11 Element 11: Audit trail

The location of records is known and changes recorded.

RAG status rating: Green

3.11.1 Self-assessment Update

The Commission is currently in the last phase of replacing its old Information Management system with a new case management solution. The new system will allow a more advanced audit trail.

Some business activities records will not be stored in the case management system. These records are stored within the shared drive and rely on good practice guidance. We also undertake periodic clearings using a disk space analyser software's.

The Commission review and update the list of IAO periodically.

Due to financial and resource constriction, the implementation of a separated ERDMS for the records that won't be stored in the new case management system is not currently an option.

3.11.2 Progress Review Comments

See also elements 4 and 5.

The situation where some public records in an authority are still managed in a shared drives structure is not uncommon. The PRSA Implementation Team notes that an earlier proposal to roll-out a corporate eDRMS has been postponed. This is not, in itself, an indication that the Commission is not compliant in this element of their RMP as long as there is a recognition that a more 'manual' records management process will be necessary for those records. For example, to ensure that the location of records is known and changes recorded, as required for element 11 of a RMP, it will be important that record creators implement a consistent naming convention and version control procedure. As local information asset owners are already in place in the authority the monitoring of management in business area shared drives will be simplified. It is also clear that records management training is provided to all staff (see element 12).

If this were a formal re-submission, and suitable evidence (such as a copy of naming convention/version control instructions) could be provided, it is possible that the RAG status of this element of the RMP could turn from Amber to Green.

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

The Information Governance Manager attends events organised by the PRSA team and others such IRMS regularly.

All new staff complete the LearnPro training on Records Management. The training needs to be passed every two years. Mandatory training performance is one of the key indicators of the Commissions Quality and Performance report. In February 2026, 84% of staff had passed the training.

Learnpro monthly reports are sent to staff and line managers to monitor their training.

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 the Commission.

For example the LearnPro records management module mentioned above and at element 3 or the ‘compulsory readings’ of data protection policies and procedure documents mentioned at element 9.

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

Without changes. The Commission is engaged with the PRSA PUR reporting process.

Internally, twice a year records management matters are reported to the ELT and the Audit, Performance and Risk Committee.

3.13.2 Progress Review Comments

Section 5(1)(a) of the Act says that an authority must keep its RMP under review. The Keeper's Implementation Team acknowledge that this requirement is being appropriately pursued by the Mental Welfare Commission for Scotland.

They welcome the authority's continued engagement with the Keeper's Progress Update Review (PUR) process.

At the time of the original agreement (2014) The Keeper agreed that the Commission 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.

As noted elsewhere it is clear that relevant policy and guidance documents are appropriately reviewed (for example the Records Management Policy biannually)

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

Without changes. We are currently reviewing expired agreements with the relevant stakeholders. Key agreements are uploaded on our website.
How we work with other organisations sections.

3.14.2 Progress Review Comments

Thank you for confirming that that information sharing with other bodies or individuals is appropriately controlled and that records management is properly considered. The evidence package that accompanied the last RMP submission included agreements with the Scottish Social Services Council and the Mental Health Tribunal and the Keeper was able to agree that the Commission properly considers records governance when undertaking information sharing programmes. Therefore, this element is liable to retain its Green agreed RAG status.

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

3.15.2 Progress Review Comments

As this Element was not assessed in 2014, 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 the Mental Welfare Commission for Scotland 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 the Mental Welfare Commission for Scotland'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.