

Assessment report on the revised Records Management Plan of

Scottish Futures Trust Limited

Submitted on 21st February 2025

Report issued by The Keeper of the Records of Scotland on 2nd October 2025

Public Records (Scotland) Act 2011

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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 fully 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 record keeping 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. Executive Summary

This report sets out the findings of the Keeper's assessment of the RMP of Scottish Futures Trust Limited by the Public Records (Scotland) Act 2011 Assessment Team following its submission to the Keeper on 21st February 2025.

The assessment considered whether the RMP of Scottish Futures Trust Limited was developed with proper regard to the 15 elements of the Keeper's statutory Model Records Management Plan (the Model Plan) under section 8(3) of the Act, and whether in this respect it complies with it and with the specific requirements of the Act.

The outcome of the assessment and the Keeper's decision on whether the RMP of Scottish Futures Trust Limited complies with the Act can be found under section 6 of this report with relevant recommendations.

3. Authority Background

Scottish Futures Trust is a limited company, operating as a non-departmental public body (NDPB) owned by Scottish Government, with the sponsor Minister being the Cabinet Secretary for Finance and Local Government. The authority operates under a framework agreement with Scottish Government that requires them to report under FReM (Scottish Government's Financial Reporting Manual). A Scottish Statutory Instrument allows Scottish Futures Trust Limited to be audited by the Auditor General of Scotland.

[Learn more about Scottish Futures Trust Limited here](#)

4. Keeper's Assessment Process

The RMP was assessed by the Public Records (Scotland) Act Assessment Team on behalf of the Keeper. Assessors used the checklist elements listed in section 5, to establish whether Scottish Futures Trust Limited's RMP was developed with proper regard to the elements of the Model Plan and is compliant with the Act. The assessment also considered whether there was sufficient supporting evidence of such compliance.

Key: Definitions in section 5:

Present - This assesses the extent to which the Authority's statements comply with this element

Evidence - This assesses the quality of the evidence submitted by the Authority to demonstrate compliance with this Element.

Each Element is given a Red – Amber – Green (RAG) status.

Key to RAG status:

G	The Keeper agrees this element of an authority's plan.		A	The Keeper agrees this element of an authority's plan 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 Keeper may choose to return the RMP on this basis.
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5. Model Plan Elements: Checklist

Scottish Futures Trust Limited

Element	Present	Evidence	Notes
1. Senior Officer	G	G	The Public Records (Scotland) Act 2011 (the Act) requires that an individual senior staff member is identified as holding corporate responsibility for records management in a public authority. Scottish Futures Trust Limited have identified Caroline Whyteside, Director of Corporate Services & Investments, as the individual with overall responsibility for records management in the organisation. The identification of the Director of Corporate Services & Investments to this role is supported by a signed statement that forms part of the authority's Records Management Plan (RMP) and by the Records Management Policy (see element 3), for example section 6. The Director of Corporate Services & Investments is document owner of the company's Business Continuity Plan (see element 10) and is part of the company's Emergency Management Team and 'core' business continuity team. The Director of Corporate Services & Investments approved the RMP. All revisions of the RMP must be approved at this level (RMP Introduction). The Director of Corporate Services & Investments works closely with the Associate Director of Legal and

			Procurement around matters arising in the implementation of the plan (RMP section 2.1). The Director of Corporate Services & Investments also approved the Records Management Policy and the IT Policy (see element 8). It is clear from the above that the Director of Corporate Services & Investments is closely aware of the records management provision in Scottish Futures Trust Limited. The Keeper agrees that Scottish Futures Trust Limited have identified an appropriate individual to this role as required by the Act. The Keeper of the Records of Scotland (the Keeper) requires an update if there is any change.
2. Records Manager	G	G	The Act requires that each authority identifies an individual staff member as holding operational responsibility for records management and that this staff member has appropriate corporate responsibility, access to resources and skills. Scottish Futures Trust Limited have identified Joanne MacConnell, Associate Director of Legal and Procurement, and Records Manager, as the individual with day-to-day responsibility for implementing the RMP. The identification of the Associate Director of Legal and Procurement, and Records Manager to this role is supported by a signed statement that forms part of the authority's Records Management Plan (RMP) and by the Records Management Policy (see element 3), for example section 6. This is also supported by the Associate Director's Job Description which has been provided to the Keeper, which includes a responsibility for "Records management compliance – including acting as SFT's Records Manager". The Records Manager is responsible for "liaising with, and being the primary contact for, the Keeper of the Records of Scotland" and for "Dealing with any other issues of any type

			that arise in relation to the plan and/or document management within SFT" (RMP section 2.1) The Associate Director of Legal and Procurement is the document owner of the RMP. The Associate Director of Legal and Procurement is also the document owner of the Records Management Policy (see element 3). It is her responsibility to keep this Policy under review (RMP section 3.2) The Associate Director of Legal and Procurement is the authority's Data Protection Officer (see element 9). The Data Protection Officer sits on the company's Emergency Management Team (see element 10). As Data Protection Officer, The Associate Director of Legal and Procurement is the document owner of the Data Protection Policy and is responsible for monitoring and reviewing its implementation (Data Protection Policy section 12.3 and 13.1 – see also element 13). The Data Protection Officer is responsible for determining the level of risk that arises from any particular data protection breach and keeping a register of any data protection breaches (Personal Data Breach Incident Management Policy – see element 9 - section 7). The Data Protection Officer is "accountable to the Leadership Team and the Board of Directors of SFT for the management of personal data within SFT and for ensuring that compliance with the Data Protection Legislation and good practice can be demonstrated" (Data Protection Policy section 3.2). The Data Protection Officer is part of the 'Additional Team for business recovery including the recovery of data in the case of an emergency (see element 10). As expected, considering Joanne MacConnell's substantive job title, Scottish Futures Trust Limited's Records Manager is part of the authority's legal department who are responsible for compliance with the Public Records (Scotland) Act 2011. As Records Manager, Joanne MacConnell is responsible for "dealing with queries about the operation of the plan and the storage of documents from other SFT employees" for "ensuring that new users are fully trained and aware of the plan by incorporating this into
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			the new start induction pack” and for “ensuring that the plan is reviewed as necessary and that any agreed changes are made to the master copy of the plan and are communicated to SFT employees and/or the public, as appropriate” (see elements 12 and 13 - RMP section 2.1). The role of the Records Manager, and her availability for guidance, has been explained to staff in a Bulletin which has been provided to the Keeper. Furthermore, in her role as Data Protection Officer, Joanne MacConnell is responsible for ensuring staff are properly informed regarding data protection compliance (Data Protection Policy section 3.3) As Records Manager, Joanne MacConnell liaises with local business areas regarding records related issues (for example RMP section 5.1). It is clear from the above that the identified individual has a detailed knowledge of the records management provision in the authority. The Keeper agrees that Scottish Futures Trust Limited have identified an appropriate individual to this role as required by the Act. The Keeper requires an update if there is any change.
3. Policy	G	G	The Keeper expects an authority to have an appropriate policy statement on records management. Scottish Futures Trust Limited has a Records Management Policy. The Keeper has been provided with a copy of this Policy. This is version 1.7 dated April 2024. The Keeper agrees that the RMP supports the objectives of the Records Management Policy. The Policy specifically mentions the RMP (Policy section 9). The Records Management Policy specifically mentions compliance with the Public Records Scotland Act 2011 (Policy Introduction). Scottish Futures Trust Limited commits that "The Records Management Policy will be

			provided to all staff." (RMP section 12). The Keeper has been provided with a screen-shot from the Scottish Futures Trust Limited SharePoint site that shows staff have access to the Records Management Policy. The Keeper agrees that Scottish Futures Trust Limited has a formal records management policy statement as required. The Keeper requires an update if there is any change.
4. Business Classification	G	G	The Keeper expects that the public records of an authority are known and are identified within a structure. Scottish Futures Trust Limited represent the structure of the record-keeping systems in their Business Classification Retention Destruction and Asset Register which has been provided to the Keeper. This is version 2.2 approved by the Director of Corporate Services and Investment (see element 1) in January 2025. The Business Classification Retention Destruction and Asset Register specifically refers to compliance with the Public Records (Scotland) Act 2011. How a business classification/retention schedule is developed must remain a business decision for an authority, it is a common practice, particularly in larger organisations, to have these as separate documents. However, the Keeper recognises that combining the various aspects of management applied to records types (position- in-structure/retention/format/owner) into a single document, as demonstrated here, is liable to provide a stronger business tool and is commended. The Business Classification Retention Destruction and Asset Register is a spreadsheet set out with the following column headings: Function/Activity/Transaction Type of Record / Information Asset - Citation (Legal requirement)

			Asset Owner Retention Trigger Retention Period Follow on Action Risk Where are these records held and how is this retention applied For example: Board minutes/Agreed minutes of the meetings of the Board of Directors of SFT/Companies Act 2006 Section 248/owner is CEO/No Retention Period set/Retain Indefinitely/Transferred to NRS for archive/High Risk/kept in SharePoint Or: Corporation tax records/Finance Act 1998 Schedule 18 Part III/Owned by the Head of Finance/Retention Trigger Date last modified/retained for 6 years/then Permanently deleted/High Risk/Paper secure filing in SFT The Keeper agrees that the Business Classification Retention Destruction and Asset Register appropriately considers the various record types liable to require management by the company. In 2017 the Keeper agreed this element of Scottish Futures Trust Limited's RMP under improvement model terms. He said "The Keeper can agree this Element on an 'improvement model' basis. This means that the authority has identified a gap in provision (the electronic systems currently used to create and manage records need to be structured in line with the BCS). The solution and the timescales to close this gap have been identified. The Keeper requests that she is informed once the project has been completed." The current Keeper is happy to acknowledge that they have been routinely updated on progress in this area through the Progress Update Review process and that they are now confident that the work to transition public records to SharePoint, that was underway in 2017, has been successfully completed. Although the authority is generally digital first (supported in the authority's Records Management Policy - see element 3 - for example at section 2), the company must manage a certain amount of physical records. These are appropriately recorded in the
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			Business Classification Retention Destruction and Asset Register. The management of physical records (both in-house and through a third party storage contactor) will differ from the management of digital records, for example see under elements 6 or 8 below. This is recognised throughout the RMP. Scottish Futures Trust Limited operate line-of-business systems that sit outside SharePoint (for example an 'Electronic Property Information Mapping Service' database). The Keeper cannot undertake a detailed study of the multiple line-of-business systems in use in the Scottish public sector and must therefore accept, unless specifically informed otherwise, that these systems are designed and implemented with suitable records management functionality (such as document-search or deletion capabilities). The Keeper agrees that Scottish Futures Trust Limited retains all its public records in controlled systems which are structured in a clear manner and which can be used by staff to manage public records where appropriate. The Keeper requires an update if there is any change.
5. Retention schedule	G	G	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. The Scottish Futures Trust Limited Records Management Policy (see element 3) states that "Records shall be retained only as long as they are required for SFT to meet its business needs and satisfy its legal obligations. At the end of that time, the records will be disposed of in accordance with its Business Classification, Retention, Destruction and Asset Register" (Policy section 2). As noted above, this Register has been provided in evidence. The imposition of retention is also supported by the Data Protection Policy (see element 9) for example at section 4. For more on the Business Classification Retention Destruction and Asset Register see element 4.

			The Keeper agrees that the Register allocates retention decisions to all the record types managed by the company as required including physical records held onsite and in a third-party record store. The introduction to the Business Classification Retention Destruction and Asset Register states: "SFT deal with a large volume of records. Some of these records pertain to SFT directly but a large number are sent to us by public and private sector stakeholders with whom SFT engages in order to undertake our business activities. The principles governing the retention and subsequent disposal of records apply regardless of their format although in practice the procedures used to manage digital and paper records will differ." The Business Classification Retention Destruction and Asset Register goes on to explain that: " In having a retention schedule SFT can ensure that: * Records are kept or destroyed consistently, rather than relying on the best guess of staff; * Records are kept for as long as necessary to meet statutory, business and regulatory requirements; * Resources are not wasted on storing records longer than necessary; * The risks arising from holding documents are managed; * Staff working with records understand their responsibilities and are given clear information about what has to be retained. The retention schedule will also help SFT in its compliance with statutory and regulatory requirements in addition to the requirements under the Public Records (Scotland) Act 2011. Primarily, it will assist with obligations under the Data Protection Act 2018, the General Data Protection Regulation, the Freedom of Information (Scotland) Act 2002 and the Environmental Information (Scotland) Regulations 2004." The Keeper agrees both of the statements as a robust explanation of the purpose and operation of a retention schedule in a Scottish public authority. This element was graded with an amber 'improvement model' at the time of the Keeper's
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			2017 agreement. The then Keeper said: "The Keeper can agree this Element on an 'Improvement Model' basis. This means that the authority has identified a gap in provision (the lack of an operational retention schedule and the application of this to records managed using SharePoint) and has described how it intends to close this gap. As part of this agreement, the Keeper requests she is sent the finalised Schedule when it becomes operational and is kept informed of the project to apply the retention schedule to SharePoint in the longer term." The current Keeper is happy to agree that this gap in provision has now been closed. The Records Manager (see element 2) will be responsible for monitoring and reviewing the schedule on a regular basis, ensuring that it continues to reflect recordkeeping best practice as well as statutory obligations. Retention schedules are living documents liable to change to reflect business needs. Clearly Scottish Futures Trust Limited understands this. The Keeper notes that retention has been appropriately considered for systems operating outside SharePoint including e-mail (RMP section 5.1). As noted against element 4, Scottish Futures Trust Limited operates some line-of-business systems (for example 'Business Central' or the Electronic Property Information Mapping Service). The Keeper can agree that these have appropriate retention/destruction functionality. The Keeper agrees that Scottish Futures Trust Limited has a schedule providing retention decisions for the record types created while pursuing its functions. The Keeper requires an update if there is any change.
6. Destruction Arrangements	G	G	The Act requires that public records are destroyed in a timely, controlled and secure manner. As noted under elements 4 and 5 Scottish Futures Trust Limited has a Business Classification Retention Destruction and Asset Register which shows the retention periods allocated to each record type in the authority regardless of format. The Records Management Policy (see element 3) provides specific support for the Retention and

			Destruction Schedule (Policy section 2.). As the introduction to this document explains: “The principles governing the retention and subsequent disposal of records apply regardless of their format although in practice the procedures used to manage digital and paper records will differ.” This particularly applies to destruction procedures. With this in mind, Scottish Futures Trust Limited has the following process in place, to ensure the controlled, secure and irretrievable destruction of public records. <u>Digital SharePoint</u>: The Keeper agrees that public records managed on the authority’s SharePoint sites are subject to retention. The Keeper has been provided with a copy of Scottish Futures Trust Limited’s staff SharePoint Deletion Guidance document and with a screen-shot showing that staff have access to that guidance. The Keeper has also been provided, subsequent to the initial submission, with a detailed explanation of the permanent deletion of information assets that have to be permanently deleted after a prescribed retention period. The Keeper thanks the company for providing this. <u>Digital Line-of-Business</u>: These line-of-business systems sit outside SharePoint, but the Keeper can agree that they are likely to allow the destruction of public records within a retention framework as required. Scottish Futures Trust Limited has provide the following statement: “Where the records are held on third-party systems (such as Cascade for HR records, or Dynamics for Finance records), retention periods are applied in these systems and automatically deleted.” <u>Physical Outstore</u>: Scottish Futures Trust Limited manage a small amount of paper records. To help facilitate this the authority has a contract with a third-party storage provider. Records in this store are tracked and destroyed through a register and barcode system. The Keeper has been provided with a copy of the detailed spreadsheet that shows this system in operation.
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			<u>Physical in-house:</u> Paper records are destroyed by the Scottish Legal Aid Board, who are the 'landlords' of the Scottish Futures Trust Limited offices in Thistle House. This is done through a contract with a third-party contractor. Scottish Futures Trust Limited have provided the Keeper with a sample destruction certificate to show this arrangement is in operation. The Keeper has previously agreed that the physical record destruction processes in the Scottish Legal Aid Board are appropriate: The Keeper's assessment of the records management provision in Scottish Legal Aid Board can be viewed here <u>Hardware:</u> Deletion of records from redundant or repurposed hardware is undertaken by the Scottish Futures Trust Limited. The RMP explains this process (section 6.1). <u>Back-Ups:</u> Scottish Futures Trust Limited quite properly retain back-up copies of public records for business continuity purposes (see element 10). This is done through a back-up software programme.. A screen-shot of the front page of this programme has been provided to the Keeper which clearly shows that the authority can be confident on how long back-up copies of records remain available. The Keeper notes that the Records Manager is considering how best to ensure other Information Assets (where a discretionary retention period is applied), are best managed. This forms part of the Records Manager's objectives and is referenced in an Action Plan, which has also been supplied. A review of the implementation of destruction processes is welcome as business demands are liable to change over time. However, there is no indication that destruction <u>processes</u> are not in place for records in all formats. The Keeper agrees that Scottish Futures Trust Limited has processes in place to irretrievably destroy their records when appropriate. The Keeper requires an update if there is any change.
7. Archiving and Transfer	A	G	The Act requires that all Scottish public authorities identify a suitable repository for the permanent preservation of any records considered suitable for archiving. A formal arrangement for transfer to that repository must be in place.

			Scottish Futures Trust Limited have identified the National Records of Scotland as the proper repository for the small selection of their public records suitable for permanent preservation. Some of the public records of the company will therefore become part of the national collection. NRS is an accredited archive, read more about the national collection and archives accreditation scheme here. NRS fully adheres to the Keeper's Supplementary Guidance on Proper Arrangements for Archiving Public Records. Read more about arrangements for archiving public records here. Archive transfer arrangements will operate under the terms of a formal Transfer Agreement. However, at the time of assessment this agreement had not been agreed by both parties. A transfer agreement being a 'work-in-progress' is acknowledged in the RMP "SFT is liaising with National Records Scotland to agree an Archive Transfer Agreement for its records, where relevant and required to do so in relation to the records it holds" (RMP section 7). Scottish Futures Trust Limited have provided the Keeper with evidence of engagement with the NRS Client Management Team. As the Implementation Team understands the situation, there is some delay in agreement regarding records being transferred digitally to NRS, over and above the agreed harvesting of the Scottish Futures Trust Limited website (which is a separate process). The NRS client manager will advise on this and on which record types are considered suitable for permanent preservation. The Scottish Futures Trust Limited website has been selected for preservation as part of the NRS Web Continuity Service The NRS web archive is here The Keeper agrees this element of the Scottish Futures Trust Limited Records Management Plan on 'improvement model terms' while negotiations around the transfer agreement are underway. • The Keeper requires Scottish Futures Trust Limited to engage with their client manager in order to progress the adoption of a formal archive transfer agreement. 1 year post-agreement, the Keeper will ensure that Scottish
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			Futures Trust Limited are invited to provide a Progress Update Review. The Keeper would expect to see some clear progress around a formal agreement at that time. More about the Progress Update Review process can be found here.
8. Information Security	G	G	The Act requires that public records are held in accordance with information security compliance requirements. The RMP states (section 8): “SFT is committed to the secure use of information in order to protect the integrity and confidentiality of the information under its control” With this commitment in mind Scottish Futures Trust Limited have provided the Keeper with the authority’s IT Policy. This is version 3.2 approved by the Director of Corporate Services & Investments (see element 1) in January 2025. The implementation of an IT Policy is specifically supported by the Records Management Policy (see element 3). For example at sections 2 and 4. In 2017, the then Keeper agreed this element of the Scottish Futures Trust Limited RMP on improvement model terms. He said “The Keeper can agree that there are appropriate mechanisms in place to ensure the security of the information created and managed by SFT. As part of this agreement, the Keeper requests that she is sent a copy of the updated IT Policy when it becomes available.” The current Keeper is pleased to acknowledge that this requirement has now been met. The IT Policy supported by a suite of other corporate security policies such as the Password Policy (provided to the Keeper - May 2023 version). The IT Policy includes staff instruction on reporting security breaches (for example at sections 4 or 8). The Keeper notes that the IT Policy demonstrates recognition of information management risks of ancillary systems such as Teams (IT Policy section 9), AI (section 10) and mobile

			devices (section 12). Similarly, the IT Policy recognises the risk generated by remote working/working from home (section 15). The IT Policy also recognises the risk generated when a staff member leaves the organisation, for example at section 12. The IT Policy supports the Scottish Futures Trust Limited Data Protection Policy (see element 9) for example at section 10. Equally, the IT Policy is supported and linked (internal intranet link) from the Data Protection Policy. Scottish Futures Trust Limited have provided evidence that key information governance policies and guidance including those around information security can be accessed by appropriate staff. The Keeper is pleased to note that an independent external IT security audit was carried out in December 2024 and that Scottish Futures Trust continues to achieve Cyber Security Essentials Plus certification: Scottish Futures Trust Limited Cyber Security Registration can be viewed here The authority complies with the requirements as set out within the public sector cyber resilience framework (IT Policy section 3) Scottish Futures Trust recognise the importance of security being applied to physical records. The organisation is digital-first (see element 4) but it is important that, in business areas where they exist, hard-copy public records are adequately protected. Scottish Futures Trust Limited operate in a Scottish Government building managed by the Scottish Legal Aid Board. The Keeper has previously agreed that the physical security processes in the Legal Aid Board are suitable for the protection of public records: The Keeper's assessment of the records management provision in Scottish Legal Aid Board can be viewed here
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			The Keeper agrees that Scottish Futures Trust Limited have procedures in place to appropriately ensure the security of their records as required by the Act. The Keeper requires an update if there is any change.
9. Data Protection	G	G	The Keeper expects a Scottish public authority to manage records involving personal data in compliance with data protection law. Scottish Futures Trust Limited is registered as a data controller with the Information Commissioner's Office (ICO): Scottish Futures Trust Limited Registration can be viewed here Scottish Future Trust Limited have a Data Protection Policy. The Keeper has been provided with a copy of this <i>Policy</i>. This is Version 5.0, approved by the company's Director of Corporate Services & Investments (see element 1) in February 2025. The Data Protection Policy confirms that "The Board of Directors and the Leadership Team of SFT are committed to compliance with the Data Protection Legislation and any other applicable data protection laws" (<i>Data Protection Policy</i> section 2.1) The Data Protection Policy includes instructions for staff on how to report potential data breaches (section 10 - see also Personal Data Breach Incident Management Policy below). The RMP features a compliance statement by the Senior Officer responsible for records management (see element 1). This statement specifically refers to compliance with data protection legislation. Members of the public are made aware of their rights and how they can make a subject access request here. Staff instructions on how to deal with subject access requests make up part of the Data Protection Policy (section 9). As required by data protection legislation, Scottish Futures Trust Limited have identified a

			Data Protection Officer. This is Joanne MacConnell (see element 2) or in her absence, the depute data protection officer, Paul Moseley. Scottish Futures Trust Limited have committed to carrying out data protection impact assessments before they begin any processing of personal data which is likely to result in a high risk to individuals (Data Protection Policy section 5). The Data Protection Policy is supported by a separate, and highly detailed, Personal Data Breach Incident Management Policy which has also been supplied to the Keeper. This is version 4.0 approved by the SFT Leadership Team in April 2024. This policy includes useful examples, of potential data protection incidents and how they should be managed. The Records Management Policy (see element 3) specifically indicates support for the General Data Protection Regulation (GDPR), and the Data Protection Act 2018 (For example Policy sections 2 and 3). In 2017, the then Keeper agreed this element of the Scottish Futures Trust Limited RMP on 'amber' improvement model terms. The agreement stated "The Keeper can agree that SFT is aware of its responsibilities under the Data Protection Act 1998 and has procedures in place to comply with it. As part of this agreement, the Keeper requests that he is sent a copy of the updated Data Protection Policy when it becomes available." The Keeper is pleased to acknowledge that this has now been done. The Keeper has been provided with evidence that Scottish Futures Trust Limited staff have access to the authority's Data Protection Policy and Personal Data Breach Incident Management Policy The Keeper agrees that Scottish Futures Trust Limited have arrangements in place that should allow them to properly comply with data protection legislation. The Keeper requires an update if there is any change.
10. Business	G	G	The Keeper expects that record recovery, prioritising vital records, is an integral part of the

Continuity and Vital Records			authority's business continuity planning. The RMP states that Scottish Futures Trust Limited has a Business Continuity Plan (BCP) to ensure that it can recover quickly in the event of an unexpected interruption to its normal business activities. At present all electronic records can be accessed through the Office 365 Cloud portal. The BCP has been submitted as evidence. This is version 2.8, approved by the Director of Corporate Services & Investments (see element 1) in March 2025. The Keeper has consulted the BCP and agrees it includes record recovery (for example section 3). The BCP outlines the actions to be taken in the event of a disaster and has identified the individuals who have responsibility ensuring that the appropriate actions are taken. The BCP includes specific reference to data protection risks in an emergency (see element 9) and the recovery of SharePoint sites. The RMP notes that a hard-copy version of the BCP is available in the case that all digital access is compromised. This is commendable. The implementation of a Business Continuity Plan system is specifically supported by the Records Management Policy (see element 3). For example, at Policy section 2. The Keeper has been provided with evidence that key information governance policies and guidance can be accessed by appropriate staff. Scottish Futures Trust Limited has an Emergency Management Team. Both the Director of Corporate Services and Investments (see element 1) and the Data Protection Officer (see element 2) sit on this Board. Scottish Futures Trust Limited commissioned an audit of their business continuity procedures in 2024. The result of the audit was one of 'substantial assurance' (the highest grading). The Keeper thanks Scottish Futures Trust for providing a full copy of this report.
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			Staff training is fundamental to the smooth recovery in an emergency (including record recovery). It is noted that Scottish Futures Trust Limited pursue this training regularly. The Keeper has been provided with details of this exercise. The Keeper agrees that Scottish Futures Trust Limited have an approved and operational business continuity process and that information management and records recovery properly feature in the authority's plans. The Keeper requires an update if there is any change.
11. Audit trail	G	G	The Keeper expects an authority to have processes in place to track public records in such a way that their location is known and changes recorded. The Records Management Policy (see element 3) states that Scottish Future Trust Limited "aims to ensure that its management of records supports...Access so that records can be retrieved efficiently and accurately." (Policy section 4) <u>SharePoint</u>: The principle record-keeping system in Scottish Futures Trust Limited is SharePoint which has the functionality to maintain an audit log of all activities that take place on a record. The Keeper notes that "Guidance on both version control and file naming have been provided to all staff and are available centrally through the SharePoint site at any time" (RMP section 11.1). This combined with the structure of the Business Classification Retention Destruction and Asset Register, and with the powerful SharePoint search facility, should allow staff to locate documents when required. The Keeper acknowledges that they have been provided with the authority's Document Version Control guidance note. However, this is for formal policy documents only and from the evidence documents provided as part of the submission, the Keeper can see that the instructions in the guidance note are applied to policies as expected. <u>Digital Line-of-Business</u>: Scottish Futures Trust Limited operate line-of-business systems such as 'Business Central'. The Keeper can accept these systems have record tracking

			functionality. <u>Physical records:</u> Scottish Futures Trust Limited is a digital-first authority (Records Management Policy - see element 3 – section 2) However, they must manage a small amount of paper records. To facilitate this the authority has a contract with a third-party contractor for the provision of off-site storage. Records in this store are tracked through a register and barcode system. The Keeper has been provided with a copy of the detailed spreadsheet that shows this system in operation. The Keeper acknowledges that it includes record identification, the date of transfer and the scheduled review date. A limited amount of paper records are stored on-site in Scottish Futures Trust Limited offices in Thistle House. There are basic box-level controls in place for example a note of the contents, and review date. The Keeper accepts that this is a relatively small amount of records and this, combined with their identification in the Business Classification Retention Destruction and Asset Register (see element 4), should allow public records to be located and retrieved as required. The Keeper agrees Scottish Futures Trust Limited has procedures in place that will allow them to locate their records and assure themselves that the located record is the correct version. The Keeper requires an update if there is any change.
12. Competency Framework for records management staff	G	G	The Keeper expects staff creating, or otherwise processing records, to be appropriately trained and supported. As a small public authority, the Keeper would not expect Scottish Futures Trust Limited to employ a full-time professional records manager. However, they must be confident that the officer assigned the records management role in the company has access to suitable training opportunities and that records management is considered a business task separate from general office management. As noted under element 2, the Keeper has been provided with a Job Description for the Associate Director of Legal and Procurement that clearly shows records management a separate responsibility. Furthermore, as noted under element 9, the identified individual is the authority's Data Protection Officer and

			passed a Certified Data Protection Officer course in November 2024. The company makes the following commitment: "The Records Manager, Office and Business Support Manager, the IT Manager and other relevant SFT employees (for example, the Legal & Procurement team who deal with freedom of information requests) will continually develop their understanding of records management. In particular, the Records Manager will attend relevant training and conferences." (RMP section 12) The Keeper's Implementation Team can confirm that members of staff at the company have attended training events NRS has hosted. The RMP makes the following commitment: "The Director of Corporate Services & Investments [see element 1] will also liaise with the Records Manager [see Element 2] to ensure that appropriate training is provided for SFT staff in the operation of the plan" (RMP section 1.1) The Records Management Policy (see element 3) makes the following commitment: "All staff within SFT will be provided with materials and briefings to highlight and increase awareness of responsibilities in terms of records management. These materials will also be included in the SFT induction pack for all new staff members. This training will supplement ongoing staff training in terms of both data protection and freedom of information." (Policy section 8). These are welcome commitments. There is sufficient evidence in the RMP and in the supporting evidence package that adequate training of all staff is considered. For example, it is noted as essential for staff to attend training on the requirements of the Data Protection Policy (Data Protection Policy sections 1.2 and 12). The IT Policy (see element 8) confirms that "training is provided as part of the induction process for all users and ongoing training provided will be mandatory (IT Policy section 8). Many of the recent information security breaches in the public sector stem from human
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			error. It is therefore important that staff are trained on the authority's information security requirements and that this training is routinely repeated. It seems clear that Scottish Futures Trust Limited are actively pursuing this principle (see for example RMP section 8.1) The Records Management Policy specifically commits that "Any subsequent changes to this policy will be communicated to all staff via an email briefing and, if deemed necessary, further training events." (Policy section 10). The Keeper has been provided with samples of staff communication dealing with information governance issues (such as updates to the Data Protection Policy) and has been provided with sample slides from all-staff training on an information governance topic (records recovery in an emergency). In 2017 the Keeper agreed this element of the Scottish Futures Trust Limited RMP on improvement model terms. The then Keeper stated "The Keeper can agree that SFT recognises the importance of records management and endeavours to ensure that staff have access to appropriate training. As part of this agreement, the Keeper requests that she is sent a sample of the training when it becomes available." The current Keeper is pleased to acknowledge that this requirement has now been met. The Records Manager is responsible for dealing with queries about the operation of the plan and the storage of documents from other Scottish Futures Trust Limited employees and for "ensuring that new users are fully trained and aware of the plan" (RMP section 2.1) The Keeper agrees that Scottish Futures Trust Limited consider information governance training for staff as required. The Keeper requires an update if there is any change.
13. Assessment	G	G	Section 5(1)(a) of the Act says that an authority must keep its RMP under review.

and Review			The RMP is reviewed annually with a first review scheduled for January 2026 (<i>RMP</i> control sheet and Introduction). The authority has provided the Keeper with a copy of its Policy and Procedures Review spreadsheet showing the scheduling of reviews (including several of the supporting information governance policy documents – see below). Reviewing the implementation of the <i>RMP</i> is the responsibility of the Records Manager (see element 2) with input from the IT Manager in respect of digital records. This is confirmed by the Job Description provided to the Keeper and by statements in the RMP (for example at section 2.1). Results of the annual RMP review are reported to the Director of Corporate Services & Investments (see element 1) who sits on Scottish Futures Trust’s Leadership Team and reports directly to the Chief Executive. The RMP states that a review will be undertaken using ‘performance indicators’ (RMP section 13). These are managed by the Records Manager and improvements reported regularly to the Director of Corporate Services & Investments. To track these indicators, the Records Manager maintains an Action Plan which has been supplied to the Keeper, as have screen-shots of correspondence showing relevant engagement with the Director of Corporate Services & Investments for review prior to the last review date for the plan. The Director of Corporate Services & Investments may add information governance issues to Scottish Futures Trust Limited’s internal audit plan. As an example, the Keeper notes that an independent external IT security (element 8) audit was carried out in December 2024. The Keeper acknowledges that Scottish Futures Trust Limited has fully engaged with the Progress Update Review process since their original agreement in 2017. The IT Policy (see element 8) is scheduled to be reviewed in January 2026. The Records Management Policy (see element 3) is scheduled to be reviewed in
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			February 2026. The Business Continuity Plan (see element 10) is due to be reviewed in March 2026. The Data Protection Officer (see element 2) is required to review the Data Protection Policy annually. Both the Data Protection Policy and the Personal Data Breach Incident Management Policy (see element 9) were due to be reviewed at the time of this assessment. The Keeper is pleased to acknowledge that, since the initial RMP submission, these reviews have taken place and that updated versions of both documents have subsequently been provided. The Keeper agrees that Scottish Futures Trust Limited have 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. Furthermore, it is agreed that supporting policy and guidance documents have appropriate review periods allocated. The Keeper requires an update if there is any change.
14. Shared Information	N/A	N/A	The Keeper expects a Scottish public authority to ensure that information sharing, both within the Authority and with other bodies or individuals, is necessary, lawful and controlled. Scottish Futures Trust Limited do not have formal information sharing arrangements with any third-parties. The RMP points out, correctly, that the sharing of personal information must be undertaken under requirements of data protection legislation and the Keeper has agreed, that Scottish Futures Trust Limited is compliant in this matter under element 9. The RMP also notes requirements under Freedom of Information (FOI) legislation, but this lies outside the scrutiny of the Keeper. However, the Keeper thanks the authority for providing FOI evidence such as their publication scheme.

			The authority does have an information sharing process, around a particular line-of-business system, with the Scottish Government. However, this is described as ‘informal’ and the Keeper has previously agreed the information sharing processes in the Scottish Government are appropriately controlled: The Keeper's Assessment of the records management provision in the Scottish Government can be viewed here Therefore, the Keeper can agree this element does not apply to Scottish Future Trust limited. The Keeper requires an update if there is any change.
15. Public records created or held by third parties	N/A	N/A	The Act makes it clear that records created by third parties when carrying out the functions of a scheduled authority should be considered ‘public records’ - PRSA 3 (1)(b). Scottish Futures Trust Limited state clearly in their RMP (section 15) that “There are no third parties that carry out any functions of SFT”. Therefore, the Keeper can agree this element does not apply to Scottish Future Trust Limited. The Keeper requires an update if there is any change.

General Notes on submission:

Version: This assessment is on the Scottish Futures Trust Limited Records Management Plan (the *RMP*) submitted to the Keeper for agreement on 21st February 2025. This is version 1.8 of the *RMP* approved in January 2025 by the Director of Corporate Services & Investments (see element 1). It is 'owned' by the Records Manager (see element 2). The Keeper acknowledges that she has now received version 1.9 (August 2025), which features minor amendments, to keep the Scottish Futures Trust Limited submission up-to-date. This later version has not been separately assessed.

The *RMP* has been signed by both the Director of Corporate Services & Investments and by the Records Manager.

The Keeper originally agreed the *RMP* of Scottish Futures Trust Limited in 2017.

[Scottish Futures Trust 2017 Assessment Report can be viewed here](#)

The authority submitted a Progress Update Review (PUR) in 2019, 2020, 2021, 2022 and 2024. [The Scottish Futures Trust Progress Update Review for 2024 can be viewed here](#)

The *RMP* mentions the Act and is based on the Keeper's, 15 element, Model Plan. [The Model Records Management Plan can be viewed here](#)

The authority refers to records in the following terms: "We recognise that records and information are a vital business resource that maintaining strong information governance, including effective record management, will bring substantial benefits to our business. This will result in greater business efficiency and considerable improvements in the use of financial, human and other resources within SFT. We are committed to ensuring that our policies, procedures and practices are implemented, reviewed and developed." (*RMP* Introduction). The Keeper agrees that the efficiencies introduced by robust records management provision will assist Scottish Futures Trust Limited to attain these objectives.

The authority refers to records as a business asset (for example *RMP* section 3.1). This is an important recognition and the Keeper commends it.

Elements that require development by Scottish Futures Trust Limited are as follows:

7. Archiving and Transfer

6. Keeper's Decision

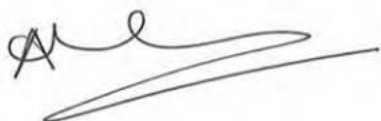
As Keeper of the Records of Scotland I have reviewed the revised records management plan and the supporting evidence provided by Scottish Futures Trust Limited. I have also had regard to the guidance issued by my predecessors as Keeper under section 1(4) of the Act, to the model records management plan published under section 8, and to the nature of the authority and its public records.

Scottish Futures Trust Limited has made no representations to me other than those referred to in the assessment above.

I accept and adopt the assessment of the plan and evidence as set out in Section 5 above.

Based on that assessment, and for the reasons given in it, I consider that the plan sets out proper arrangements for the management of the public records of the Authority.

Accordingly, in terms of section 4(3)(a) of the Act as applied by section 5(7), I hereby agree the revised records management plan submitted by the Authority on 21st February 2025.

A handwritten signature in dark ink, appearing to be 'Alison Byrne', with a long horizontal flourish extending to the right.

Alison Byrne OBE
Keeper of the Records of Scotland