National Records of Scotland

Public Records (Scotland) Act 2011

Scottish Children's Reporter Administration
The Principal Reporter
Assessment Report

The Keeper of the Records of Scotland

14th April 2016

Contents

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 **the Scottish Children's Reporter Administration** and **the Principal Reporter** by the Public Records (Scotland) Act 2011 Assessment Team following its submission to the Keeper on **18th November 2015.**

The assessment considered whether the RMP of the Scottish Children's Reporter Administration and the Principal Reporter was developed with proper regard to the 14 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 the specific requirements of the Act.

The outcome of the assessment and the Keeper's decision on whether the RMP of the Scottish Children's Reporter Administration and the Principal Reporter complies with the Act can be found under section 7 of this report with relevant recommendations.

3. Authority Background

The Scottish Children's Reporter Administration (SCRA) is a national body formed under the Local Government (Scotland) Act 1994. It became fully operational on 1st April 1996. Their main responsibilities as set out in the Act are:

•To facilitate the work of Children's Reporters,

•To deploy and manage staff to carry out that work,

•To provide suitable accommodation for Children's Hearings.

SCRA has nine localities, supported by a Head Office. The nine localities are: Highlands & Islands, North Strathclyde, Glasgow, Grampian, South East, Tayside & Fife, Ayrshire, Central, and Lanarkshire/Dumfries & Galloway.

The Principal Reporter: Neil Hunter became Principal Reporter and Chief Executive of the Scottish Children's Reporter Administration in April 2011.

A Reporter's role is to:

•Receive referrals for children and young people who are believed to require compulsory measures of supervision.

•Draft a statement of grounds and decide whether the child needs to be referred to a Hearing.

•Provide administration to Children's Hearings and keep a record of proceedings at Hearings.

•Maintain the independence of Hearings and support fair process.

•Conduct Children's Hearings court proceedings.

http://www.scra.gov.uk/home/index.cfm

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 the Scottish Children's Reporter Administration and the Principal Reporter'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:

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 he is convinced of the authority's commitment to closing a gap in provision. He will request that he is 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.

5. Model Plan Elements: Checklist

Element	Present	Evidence	Notes
1. Senior Officer *Compulsory element*	**G**	**G**	The Scottish Children's Reporter Administration and Principal Reporter (SCRA) have identified Malcolm Schaffer, the Head of Practice & Policy and Senior Information Risk Owner (SIRO), as the individual with overall responsibility for records management in the authority. This is confirmed by a *Supporting Statement* by Mr Schaffer and by Neil Hunter, Principal Reporter, dated November 2015. This *Statement* features as part of the *Records Management Plan* (the *Plan*) (Appendix 1). The SIRO is accountable to the Chief Executive/Principal Reporter as the Accountable Officer in the authority. Mr Schaffer chairs the Information Governance Leads Group **(see under General Comments below)**. SCRA note that overall responsibility for records management has recently been allocated to the Head of Practice & Policy role and some of the submitted evidence will refer to the previous arrangement where records management was the responsibility of the Director of Support Services. The *Plan* itself correctly identifies the current role. The Keeper understands this change and accepts that all reference to the 'Director of Support Services' (regarding records management) should be read as 'Head of Practice & Policy' for the purposes of this assessment. SCRA have committed to amend relevant documents when appropriate. As SIRO, Mr Schaffer is responsible for information security and risk to records and

			is supported by local Information Asset Owners **(see under General Comments below)**. Responsibility for the identification of Mr Schaffer to this element lies with the Principal Reporter and Chief Executive. The Keeper agrees that SCRA have identified an appropriate individual to this role as required by the Act.
2. Records Manager *Compulsory element*	**G**	**G**	SCRA have identified Dr Gillian Henderson, Information & Research Manager, as the individual responsible for the day-to-day implementation of the *Plan* in the authority. This is confirmed by a *Supporting Statement* by Malcolm Schaffer **(see element 1)** and by Neil Hunter, Principal Reporter, dated November 2015. This *Statement* features as part of the *Records Management Plan* (the *Plan*) (Appendix 1). Dr Henderson's name is given as contact in the *Covering Letter* from Mr Hunter which accompanies the *Plan*. Dr Henderson's *Job Description* has been shared with the Keeper. This shows she is properly assigned responsibility for information management. The *Job Description* specifically mentions the Act. Dr Henderson is supported by an information governance team including an Information Governance Assistant and an Information Security & Technical Assurance Officer (responsible for element 4). The Assistant and Assurance Officer's job descriptions have also been provided. Dr Henderson is the author of the *Records Management Policy* **(see element 3)**. Dr Henderson is responsible for: "developing and maintaining information governance policies, procedures and guidance; raising awareness of information

			governance roles and responsibilities; monitoring and reporting on compliance with statutory and regulatory obligations; providing advice and guidance to staff and stakeholders on information governance related matters; training; monitoring and responding to data protection vulnerabilities and incidents; and responsible for coordinating and managing the response to all information requests received by SCRA." (*Plan* page 6). She is also responsible for monitoring the retention and deletion of corporate records (*Plan* page 14) and for archiving and transfer arrangements (page 17). The Keeper has been provided with a copy of a paper presented to the SCRA Executive Management Team regarding the Act. Dr Henderson was the author of this paper. Responsibility for the identification of Dr Henderson to this element lies with the Head of Practice and Policy. The Keeper agrees that SCRA have identified an appropriate individual to this role as required by the Act.
3. Policy *Compulsory element*	**G**	**G**	SCRA have a *Records Management Policy*, setting out procedures for the management of the authority's corporate records, which has been submitted to the Keeper. This is version 1.5 created by the Information & Research Manager **(see element 2)** in 2011 and reviewed by the Executive Management Team in November 2015. SCRA have a *Case Information Policy*, setting out the management of the authority' case file records, which has been submitted to the Keeper. This is version 1.6 created by the Data Protection Officer **(see element 9)** in 2014

			and reviewed in November 2015. Both of these policies are available to SCRA staff on their 'Connect' intranet. A screen shot has been provided in evidence. The *Case Information Policy* and the *Records Management Policy* make up part of the *Information Governance Overarching Framework* (also provided). Responsibility for this element lies with the Information & Research manager **(see element 2)**. The Keeper agrees that SCRA have a records management policy statement as required by the Act.
4. Business Classification	**G**	**G**	SCRA have an *Information Asset Register*, covering all the functions of the authority, that has been supplied to the Keeper. Despite the statement in the *Plan* (page 10) that SCRA "does not currently have a business classification scheme". The supplied *Information Asset Register* is quite sufficient under this element for the purposes of the Act. SCRA intend to create a separate Business Classification Scheme as a business tool and have shared details on how this will be collated; principally combining the existing *Information Asset Register* and local returns from business areas (*Template Scoping Form* provided to the Keeper). As well as activity and transaction (i.e. HR16 - Organisational Development/Feedback Analysis), the *Information Asset Register* identifies the sensitivity of records as well as the Information Asset Owner (name and job title),the system in which held and the legal requirement to retain.

			Over the last few years, SCRA have been in discussion with the Scottish Government (IT provider) regarding improving the structure of the administration's corporate records. A proposal, shared with the Keeper, to create a single SCRA drive has not yet been adopted. **The Keeper would be interested to be kept abreast of any developments in these negotiations.** As with other 'Scots' users SCRA are currently engaging in a shared drive 'clean-up'. This should not affect the structure of their *Information Asset Register*. Staff have access to a personal 'H' drive. The Keeper confirms that records on this drive are probably not Public Records under the Act and therefore do not have to be covered by the SCRA *Plan*. SCRA operate a hybrid system with both electronic and paper records (e.g. pre-2013 case files are paper). The Keeper agrees that SCRA has a 'business classification scheme' in the form of an *Information Asset Register* that appropriately reflects the business of the authority.
5. Retention schedule	**G**	**G**	SCRA has incorporated the retention decisions against relevant record series into the *Records Management Policy* (corporate) and *Case Information Policy* (case files) **(see element 3)**. The SCRA retention schedule was reviewed following an ICO compliance review/audit of the authority's information security provision. The ICO report and the resulting *Action Plan Progress Report* have been provided as evidence. The *Information Asset Register* **(see element 4)** does not feature retention decisions. The Keeper has been provided with SCRA guidance on the local destruction of case

			file material where it still exists in hard-copy and with the Retention Project Plan that underlies the guidance. The guidance note sets out "what is required to be retained in each of these types of file and what can be destroyed". The *Plan* states "the review and destruction of case files now being embedded across the organisation as a business as usual activity." The Keeper commends this. Since 2013 case files have been held electronically.
			The electronic case management system deletes case files once local business areas have identified and secured any records required for longer term retention.
			Corporate files (as opposed to case files) are deleted manually at the end of their retention period. Staff are trained in this procedure.
			The Keeper agrees that SCRA has retention schedules that appropriately allocate retention decisions to the record types described in their *Information Asset Register*.
6. Destruction Arrangements *Compulsory element*	**G**	**G**	The *Plan* (page 15) states: "The Principal Reporter and SCRA have proper arrangements in place for the secure disposal of information".
			The *Plan* goes on to detail these arrangements as follows:
			Paper: Following the procedures detailed in element 5 above, the secure destruction of records is arranged through a third party contractor. A destruction receipt has been provided as evidence that this arrangement is in operation. The *Plan* (page 15) also explains the specific procedure that applies to remote or island locations including plans to introduce in-house shredding facilities.
			Hardware: SCRA destroy redundant hardware/discs either in-house or by utilising a third party contractor. The *Plan* details the process in-house and a destruction certificate for 'equipment' has been provided as evidence that third party

			arrangements are in operation. Electronic : The electronic case management system deletes case files once local business areas have identified and secured any records required for longer term retention. Corporate files (as opposed to case files) held electronically are deleted manually at the end of their retention period. Staff are trained in this procedure. SCRA financial systems have automatic 'purge' functionality. The automatic 'purge' facility will be in place by 30th September 2016 after the rollout of the upgraded version of our finance software. Back-Ups: The back-up arrangements for SCRA's Case Management System (CMS) are defined in the CMS's Disaster Recovery Plan & Procedures. System back-up tapes are held for five years. As CMS was rolled out in April 2013, there has been no destruction of system back-ups to date. A review of the resilience of CMS is underway and part of this is retention and destruction of back-ups. The review will be completed by October 2016. CMS's Disaster Recovery Plan & Procedures included as evidence. The Keeper agrees that SCRA have appropriate procedures in place for the secure and irretrievable destruction of records as required by the Act.
7. Archiving and Transfer *Compulsory element*	**A**	**G**	SCRA have identified the National Records of Scotland as the repository to which it will transfer records for permanent preservation. This is confirmed by the *Records Management Policy* **(see element 3)** section 5. An MOU between SCRA and NRS has been drafted and is being finalised. This will

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<td>be provided to the PRSA Assessment Team once signed.

SCRA's Business Plan for 2016-17 includes the action:
'We will develop and implement a process for transfer to the National Records of Scotland for permanent preservation and revise our Records Management Policy accordingly' This additional evidence is included in SCRA's RMP.

The Keeper can agree this element of the SCRA *Plan* under 'improvement model' terms. This mean that the authority has identified a suitable repository for records selected for permanent preservation and have put processes in place to formalise transfer arrangements. The Keeper's agreement is conditional on the MOU, between NRS and SCRA being, created, signed and forwarded to the PRSA Assessment Team.</td>
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<td>8. Information Security
Compulsory element</td>
<td style="background-color:green;">**G**</td>
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<td>SCRA have an *Information Security Handbook*, containing a suite of information security policies including an Information Security Policy Statement, which has been submitted to the Keeper.

This is version 3.2 created by the Information Security and Technical Assurance Officer in 2015.

The Handbook is available to staff on the 'Connect' intranet. A screen-shot has been provided in evidence.

The *Handbook* is further supported by staff reminders such as *Information Security Dos and Don'ts* and *Social Engineering Attacks* both of these, and others, have been supplied to the Keeper as evidence that information security is an important part of the staff awareness programme.

SCRA have supplied the Keeper with their *Guidance on Office Moves and*</td>
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			Refurbishments document. The Keeper commends the specific consideration of this particular information security risk. SCRA have provided examples of material they use to deliver information security awareness to staff such as their 'Big Push' campaign featuring mouse mats etc. The Keeper thanks SCRA for this inclusion and commends the awareness raising campaign. SCRA have supplied the Keeper with their current *Information Risk Register* this deals with potential security breaches. For example it identifies the risks to information security when a staff members leaves. The Keeper agrees that SCRA have an approved and operational information security policy in the form of staff handbook.
9. Data Protection	**G**	**G**	SCRA publish their 'customer commitment' on their website at: http://www.scra.gov.uk/cms_resources/Customer%20Commitment%20poster.pdf This includes a commitment to "keep your information safe and secure". To this end SCRA has a *Case Information Policy* **(see element 3)**, setting out the management of the authority' case file records, which has been submitted to the Keeper. This includes clauses expected in a data protection policy . This is version 1.6 created by the Data Protection Officer in 2014 and reviewed in November 2015. SCRA are registered with the Information Commissioner: ZA015785. Details of the Data Protection Act and subject access information is published on the SCRA website: http://www.scra.gov.uk/contact_us/data_protection.cfm

| | | | Staff are trained on handling subject access requests. The training presentation has been supplied to the Keeper.

The Information & Research Manager **(see element 2)** is responsible for monitoring and responding to data protection vulnerabilities and incidents (*Plan* page 6). Dr Henderson's *Job Description* has been shared with the Keeper. The *Job Description* specifically mentions the Data Protection Act. Data breaches must be reported to the Information & Research Manager. Responsibility for this element rests with Dr Henderson and with the Data Protection Officer.

The SCRA Data Protection Officer sits on the Information Governance Leads Group **(see under General Comments below)**.

The Introduction to the Plan specifically mentions compliance with the Data Protection Act 1998.

All staff a required to undertake SCRA data protection training **(see element 12)**. Data protection compliance is specifically mentioned in the SCRA staff *Code of Conduct* which has been supplied to the Keeper.

In 2014 the ICO carried out a compliance review/audit of the authority's information security provision. The ICO report, the Board minutes acknowledging the content of this report and the resulting SCRA *Action Plan* have been provided as evidence. The minutes show that "the Executive Management Team will continue to deliver progress against the Action Plan via the existing Information Governance arrangements in place and report to the Audit Committee regularly and in line with the required update to the ICO." The Keeper thanks SCRA for sharing this document with him.

The Keeper agrees that SCRA have properly considered their responsibilities under |

	G	**G**	the Data Protection Act 1998.
10. Business Continuity and Vital Records	**G**	**G**	SCRA have a *Business Continuity Plan* which has been provided to the Keeper. This version is 2.3 dated 2013 and reviewed in June 2015. The *Business Continuity Plan* considers the recovery of records (for example sections 4.3 – 4.6 and 5.4). The *Business Continuity Plan* identifies critical functions that would be recovered as a priority. The Business Continuity Plan will be reviewed "on at least an annual basis in response to changes within SCRA and the learning gained from responding to any incidents." (*Plan* page 23). The Keeper commends the principle of reviewing continuity/recovery arrangements after an unforeseen event. SCRA have supplied the Keeper with their *Risk Management Policy* which includes a diagrammatical explanation of the reporting structure. SCRA Staff access the *Business Continuity Plan* on their intranet. A screen shot has been provided. The Keeper agrees that SCRA have business continuity arrangements that consider the recovery of records.
11. Audit trail	**G**	**G**	Version control in Documentum, the enterprise content management system, on which SCRA's Case Management System (CMS) is based, is inherent and a core feature of the product.

			All documents in CMS are held in PDF format (i.e. rendition). The original is kept but the document management system's internal controls only show the user the PDF rendition. For any content or documents created and modified by users within CMS, a similar process exists but not only is it only the PDF rendition that is user accessible, old versions of the document and old version of the rendition are out of reach. Content is only deleted from CMS when the record is destroyed, at which point the current PDF and all previous versions and renditions are deleted with it. Evidence of this is provided in 'EMC Documentum Platform. The foundation for enterprise content management'. This evidence and the text above are included in SCRA's RMP. The Keeper agrees that SCRA has procedures in place to track records and identify the correct version of a record when located.
12. Competency Framework for records management staff	**G**	**G**	Dr Henderson's **(see element 2)** *Job Description* has been shared with the Keeper. This shows she is properly assigned responsibility for information management. The *Job Description* specifically mentions the Act. The Supporting Statement from the Head of Practice & Policy and the Principal Reporter states: "The individual responsible for implementing this Plan is Gillian Henderson, Information & Research Officer (please see Element 2 for further information about her role and responsibilities). We fully endorse this Plan and support the Information & Research Officer in the delivery of the key objectives outlined." The Information & Research Manager is responsible for raising awareness of information governance roles and responsibilities and providing advice and guidance to staff and stakeholders on information governance related matters (*Plan* page 6).

			All staff are required to undertake mandatory SCRA data protection training. The data protection training presentation has been supplied to the Keeper. Data protection (and information governance generally) is a topic covered by the induction process for new staff. The Keeper has seen the SCRA induction programme. Staff are supplied with a *Data Protection Quick Guide* reminder card, a copy of which has been forwarded to the Keeper. Data protection training is provided for all new staff and for those returning from long-term absence. Staff are trained to delete corporate records from their own area at the end of their retention periods (*Plan* page 14). They also receive training on "the importance of secure disposal of personal data, and use of third party contractors for the secure destruction of confidential waste…" (page 15). Staff training in information governance is a key performance indicator for the SCRA (Information Governance Action Plan 2015-16). The Keeper agrees that the individual identified at element 2 has the appropriate responsibilities, resources and skills to implement the records management plan. Furthermore, he agrees that SCRA consider information governance training for staff as required.
13. Assessment and Review	**G**	**G**	The Act requires a scheduled public authority to "keep its records management plan under review" (part 1 5.1 (a)). The SCRA Information Governance Leads Group **(see under General Comments below)** will review the *Plan* annually and report their findings to the Audit Committee. The review will take the form of a local self-assessment carried out under the

			supervision of the Information & Research Manager **(see element 2)** and the Information Governance Leads. A template 'scoping' form has been supplied to the Keeper in evidence. The SCRA also carried out a self-assessment before creating the submitted *Plan*. The Keeper commends this action. The Plan indicates against each element the parties responsible for its review. For example element 9 "will be reviewed on an on-going basis by the Audit Committee, Executive Management Team and Information Governance Leads Group." The *Plan* mentions (pages 23 and 30) that SCRA have "internal auditors". SCRA's internal auditors are reviewing information governance in 2016-17 and SCRA will ask that the RMP is included. **The Keeper requests that he is informed if this proposal is accepted.** The Keeper agrees that SCRA have processes in place to review their *Plan* as required by the Act and have determined a time when this will take place. The responsibility for undertaking the review and the review reporting procedure are also clearly laid out.
14. Shared Information	**G**	**G**	The *Plan* states (page 31): "To ensure the effective operation of the Children's Hearings System and compliance with SCRA's statutory responsibilities under the Children's Hearings (Scotland) Act 2011, it is necessary for SCRA to share information with key partners such as local authorities, police, courts, health, solicitors, safeguarders, Children's Panel Members, Children's Hearings Scotland (CHS), and the Scottish Government. SCRA also has statutory duties to share information with children, young people and their parents and carers; and with victims of youth offending." Routine information sharing of the type described above is done under the terms of information sharing protocols. The Keeper has been provided with a selection of

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The Keeper agrees that the sample agreements he has seen properly consider information governance.

Effective information sharing protocols feature in the SCRA *Corporate Plan 2014-17*.

SCRA is a data processor for Children's Hearing Scotland. Clauses from the contract setting this up has been shared with the Keeper and he agrees these feature information governance considerations.

The Keeper agrees that SCRA formally considers governance of records when embarking on an information sharing programme.</td></tr>
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General Notes on RMP, Including Concerns:

Version:

This assessment is on the joint *Records Management Plan* (the *Plan*) of the Scottish Children's Reporter Administration and the Principal Reporter. The Keeper agrees that it is appropriate for these two authorities, separately scheduled in the Public Records (Scotland) Act 2011 (the Act), to submit a single records management plan.

The version submitted to the Keeper is that dated April 2016 and published on-line at
http://www.scra.gov.uk/home/records_management_plan.cfm

The *Plan* is accompanied by a letter of endorsement from Neil Hunter, Principle Reporter, dated 17th November 2015. It is further supported by an action plan for implementation which appears as appendix 2. This is, in turn supported by the wider Information Governance Action Plan 2015-17, which has also been supplied. SCRA agrees to provide updates to The Keeper.

The introduction to the *Plan* explains the purpose of records. Records are referred to as business assets throughout. For example *Plan* Introduction and *Information Asset Officer Handbook* repeatedly. The Keeper welcomes this recognition.

Each element of the *Plan* is associated with a responsible officer.

The *Plan* supports objectives in the SCRA *Corporate Plan* and *Business Plan*:
http://www.scra.gov.uk/home/scra_corporate_plan_2014_17.cfm
http://www.scra.gov.uk/children_s_hearings_system/about_scra/our_vision__values__standards_and_outcomes.cfm
For example core Strategy 1 item 7 in the *Business Plan*.

The *Plan* mentions the Act and is based on the Keeper's, 14 element, Model Plan http://www.nrscotland.gov.uk/record-keeping/public-records-scotland-act-2011/resources/model-records-management-plan.

Third Parties
The scope of the Act includes third parties carrying out the functions of public authorities such as SCRA. No statutory function of SCRA or the Principal Reporter is carried out by a third party. This statement is included in the Introduction of the RMP.

Information Governance Leads Group
This working group, meets every two months, is chaired by Malcolm Schaffer **(see element 1)** and is attended by Gillian Henderson **(see element 2)**. It is described as a 'critical business meeting'. The group is responsible for reviewing all SCRA information governance policies.

The Information Governance Leads Group support Information Asset Owners **(see below)**.

Reports of data breaches are shared with the Information Governance Leads Group **(see element 9)**.

Minutes from a group meeting have been shared with the Keeper as evidence of the business the group considers.

Appendix 1 of the *Overarching Framework* document provides the Keeper with an understanding of the remit and terms of reference of the Information Governance Leads Group. It is clear that this group are fundamentally important to records management provision in the authority and the Keeper thanks SCRA for sharing information about their role with him.

Information Asset Owners
Since 2011 SCRA have operated on the principle of records 'belonging' to an Information Asset Owner (IAO). IAOs are identified in the *Information Asset Register* **(see element 4)**. Information Asset Owners are responsible for identifying risks to the records for which they are responsible. The Keeper commends the use of local staff in an information governance role. The Information Asset Owners meet with the SIRO **(see element 1)** twice a year.

The Keeper has been provided with the SCRA *Information Asset Owner Handbook* version 1.0 issued in October 2015. This document specifically mentions the Act. The *Handbook* details the specific responsibilities of an IAO and how the *Information Asset Register* operates. It features a section (2) detailing the role of the Information Asset Owner in promoting a culture of robust records management. The Keeper welcomes this inclusion.
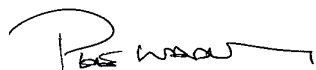
6. Keeper's Summary

Elements 1 - 14 that the Keeper considers should be in a public authority records management plan have been properly considered by the Scottish Children's Reporter Administration and the Principal Reporter. Policies and governance structures are in place to implement the actions required by the plan.

7. Keeper's Determination

Based on the assessment process detailed above, the Keeper **agrees** the RMP of **the Scottish Children's Reporter Administration and the Principal Reporter.**

- The Keeper recommends that the Scottish Children's Reporter Administration and the Principal Reporter should publish its agreed RMP as an example of good practice within the authority and the sector.

This report follows the Keeper's assessment carried out by,

…………………………………….

Pete Wadley
Public Records Officer

………………………………….

Robert Fotheringham
Public Records Officer

8. Endorsement of Report by the Keeper of the Records of Scotland

The report has been examined and is endorsed under the signature of the Keeper of the Records of Scotland as proof of compliance under section 1 of the Public Records (Scotland) Act 2011, and confirms formal agreement by the Keeper of the RMP as submitted by the Scottish Children's Reporter Administration and the Principal Reporter. In agreeing this RMP, the Keeper expects the Scottish Children's Reporter Administration and the Principal Reporter to fully implement the agreed RMP and meet its obligations under the Act.

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Tim Ellis
Keeper of the Records of Scotland