Public Records (Scotland) Act 2011

Scottish Government (Part of 'Scottish Ministers')
Parole Board for Scotland
Scottish Agricultural Wages Board
Chief Dental Officer of the Scottish Administration
Chief Medical Officer of the Scottish Administration
Her Majesty's Inspector of Anatomy for Scotland
Her Majesty's Chief Inspector of Prisons for Scotland
Her Majesty's Inspectorate of Constabulary in Scotland
Her Majesty's Fire Service Inspectorate for Scotland

Assessment Report

The Keeper of the Records of Scotland
20th August 2015

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 scheduled authorities listed below by the Public Records (Scotland) Act 2011 Assessment Team following its submission to the Keeper on **26th June 2015**:

Scottish Government (Part of 'Scottish Ministers')
Parole Board for Scotland
Scottish Agricultural Wages Board
Chief Dental Officer of the Scottish Administration
Chief Medical Officer of the Scottish Administration
Her Majesty's Inspector of Anatomy for Scotland
Her Majesty's Chief Inspector of Prisons for Scotland
Her Majesty's Inspectorate of Constabulary in Scotland
Her Majesty's Fire Service Inspectorate for Scotland

The assessment considered whether the RMP of the above named authorities 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 authorities complies with the Act can be found under section 7 of this report with relevant recommendations.

3. Authority Background

Description of Authorities: The Scottish Government is the devolved government for Scotland which is responsible for most of the issues of day-to-day concern to the people of Scotland, including health, education, justice, rural affairs and transport.

The Parole Board for Scotland is a tribunal non-departmental public body. The Board is independent of Scottish Government and impartial in its duties. Its main aim is to ensure that those prisoners who are no longer regarded as presenting a risk to public safety may serve the remainder of their sentence in the community under the supervision of a social worker. It is not the responsibility of the Board to consider the questions of punishment and general deterrence. These issues are regarded as discharged, in the case of determinate sentence prisoners, when a case is referred to the Board by the Scottish Ministers and on which the judiciary has deliberated.

The Scottish Agricultural Wages Board (SAWB) is an executive non-departmental public body set up under the Agricultural Wages (Scotland) Act 1949. The SAWB exists to set minimum rates of pay and other conditions of service for agricultural workers in Scotland.

The Chief Dental Officer (CDO) is the Scottish Government's principal dental adviser, and as such has direct access to ministers. The post has direct involvement in the development of health policy in Scotland, including, health promotion and health protection. The CDO has lead responsibility for issues such as clinical effectiveness, quality assurance, accreditation and research.

The Chief Medical Officer (CMO) is the Scottish Government's principal medical adviser and is also Head of the Scottish Medical Civil Service. The post covers every aspect of health in Scotland.

Her Majesty's Inspector of Anatomy for Scotland inspects premises where bodies for anatomical examination and anatomical specimens are kept. He also inspects record keeping and disposal practices.

Her Majesty's Chief Inspector of Prisons for Scotland is required to inspect the 16 prison establishments throughout Scotland in order to examine the treatment of, and the conditions for, prisoners. The Chief Inspector also undertakes inspections of legalised police cells. These are cells in a number of police stations, usually distant from a prison, where prisoners may legally be held for short periods while awaiting trial or immediately after conviction. The Chief Inspector also has responsibility for the inspection of the treatment of and conditions for prisoners under escort.

Her Majesty's Inspectorate of Constabulary in Scotland (HMICS) provides independent scrutiny of both Police Scotland and the Scottish Police Authority. Its role was reaffirmed by the Police and Fire Reform (Scotland) Act 2012, which gave HMICS wide ranging powers to look into the "state, effectiveness and efficiency" of both Police Scotland and the Scottish Police Authority, including forensic services.

Her Majesty's Fire Service Inspectorate for Scotland or HM Fire Service Inspectorate is an autonomous agency of the Scottish Government. Its function is to provide independent, risk based and proportionate professional inspection of the Scottish Fire and Rescue Service it is also known simply as HMFSI. It is not a fire fighting body. The HMFSI can however enquire into any matter concerning the operation of a fire and rescue service.

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 RMP of the authorities listed 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

Scottish Government (Part of 'Scottish Ministers')
Parole Board for Scotland
Scottish Agricultural Wages Board
Chief Dental Officer of the Scottish Administration
Chief Medical Officer of the Scottish Administration
Her Majesty's Inspector of Anatomy for Scotland
Her Majesty's Chief Inspector of Prisons for Scotland
Her Majesty's Inspectorate of Constabulary in Scotland
Her Majesty's Fire Service Inspectorate for Scotland

(For simplicity all these separately scheduled authorities will be described as 'The Scottish Government' in the assessment below)

Element	Present	Evidence	Notes
1. Senior Officer *Compulsory element*	**G**	**G**	Sarah Davidson, Director General Communities and Senior Information Risk Owner (SIRO) of the Scottish Government is the individual identified as having responsibility for management of the Scottish Government's public records. This is confirmed by a *Covering Letter* from Ms. Davidson dated 25th June 2015 and by the *Records Management Policy*, page 3 **(see element 3)**. The SIRO is the 'corporate owner' of the *Plan*.

			The SIRO's objectives have been included as evidence 02 and include: 'ensure corporate security policies are produced to ensure consistency across the organisation and compliance with relevant laws, regulations and IA standards' **(see element 8)**. In order to fulfil the requirements of the Act, the Keeper must see evidence that members of staff at the highest level in the Non-Scottish Government authorities consent to Ms Davidson taking overall responsibility for their records. The Keeper has been provided with statements to that effect from: Scottish Agricultural Wages Board (SAWB) - Ken Gray Parole Board for Scotland - Steven Harrison HM Fire Service Inspectorate - Steven Torrie HM Inspectorate of Prisons - Alan Forman HM Inspectorate of Constabulary - Dennis Hunter and Derek Penman (separately to the Keeper) Chief Medical Officer - Mark Johnstone Chief Dental Officer - Tom Ferris Her Majesty's Inspector of Anatomy for Scotland - Sarah Dillon The Keeper agrees that The SG have identified an appropriate individual to this role as required by the Act.
2. Records Manager *Compulsory element*			The SG have identified Maureen Henderson, Corporate Records Manager, as the individual with day-to-day responsibility for implementing the *Records Management Plan*. The *Scottish Government Records Management Competency Framework* dated July 2013 is included as evidence 28.

			Ms Henderson reports to Ann Robertson, Head of Information Management and Assurance. Overall responsibility lies with the Scottish Government SIRO **(see element 1)**. The Keeper agrees that an appropriate person has been named to the records management role as required by the Act.
3. Policy *Compulsory element*	**G**	**G**	The Scottish Government has a Records Management Policy, dated May 2015 which has been supplied in evidence 01. The RMP states that Ms Davidson **(see element 1)** has approved the *Records Management Policy*. This is confirmed by a *Covering Letter* from Ms Davidson dated 25 June 2015. The RMP commits the Scottish Government to review the *Records Management Policy* 'regularly'. The Keeper agrees that the Scottish Government has an operational and approved Records Management Policy as required under the Act.
4. Business Classification	**G**	**G**	The RMP states (page 7) 'The Scottish Government Business Classification scheme is the keystone of the records management function within the Scottish Government.' Due to the size and complexity of the Scottish Government business classification, the Keeper has unusually (and possibly uniquely), agreed that he will accept an explanation of the structure of the overarching EDRM rather than the business classification in full. The explanation describes the system currently in operation in the authority and the mechanism for imposing this structure on records as they are

created. The Scottish Government has provided sample screen shots from the *Classification.*

The RMP explains the operation of the *Objective* system in its 5 levels and a description of the elements contained in this system. An example given (evidence 53) shows how the five levels might appear: Education, Careers and Employment/Education and Skills/Student Finance/Advice and Policy: Student Finance/Record type – such as 'grant payments'.

The Keeper has also been supplied with a document *Scottish Government Business Classification Scheme* (evidence E03). This is not the scheme itself, but an explanation of why it was set up and how the various levels work. It is clearly stated in this document that 'The Business Classification Scheme underpins the Corporate eRDM system'.

The Scottish Government operates a hybrid system; public records held in paper form or on drives outside the *Objective* system are referenced in *Objective*. Thus retention decisions and 'audit trail' can be imposed on records that lie outwith the EDRM.

The subject based system is based on The Government Category List
http://www.esd.org.uk/standards/gcl/
And the Integrated Public Sector Vocabulary
http://doc.esd.org.uk/IPSV/2.00.html
The adoption of this vocabulary has allowed the use of terms familiar to other UK government organisations.

The Keeper was represented on the project team that initially developed the business classification scheme as were representatives from several other stakeholders including 'champions' from business areas across the Scottish

Government. The inclusion of local service users, in the development of systems they will rely on, is to be commended.

The retention schedule is integrated into the business classification scheme.

The business classification scheme identifies the Information Asset Owner of each record series.

Changes to the business classification scheme are controlled by formal policies.

Staff guidance, regarding saving corporate e-mails to the relevant EDRM folders, is included in the document *Scottish Government Email Archiving Enterprise Vault* (evidence E34) the Keeper commends this.

The Scottish Government have supplied sample screen shots from the Objective business classification scheme that show inclusion of the Parole Board (evidence 48), Chief Dental Officer (49), Chief Medical Officer (50), Agricultural Wages Board (51), Inspector of Anatomy (55), Inspectorate of Constabulary (56). This provides evidence that these authorities, which are scheduled outside Scottish Ministers in the Act, are included in the Scottish Government systems.

The business classification scheme contains the records of the Lord Advocate in his advisory role (evidence 57) – His decision-making role will be dealt with in a separate RMP.

(see *Review of EDRM* under General Comments below)

Scottish Ministers contract some of their functions to third parties. **(See *Third Parties* under General Comments below)**

			(See *Archival Project and Non-Objective Information* under General Comments below). The Keeper agrees that The SG have a business classification scheme that is available for appropriate staff and that covers the functions of the authority.
5. Retention schedule	**G**	**G**	The Scottish Government EDRM, *Objective* **(see element 4)** includes retention decisions for each record type. The retention schedule is, therefore, integrated. The Scottish Government operates a hybrid system; public records held in paper form or on drives outside the *Objective* system are referenced in *Objective*. Thus retention decisions can be imposed on records that lie outwith the EDRM. Staff guidance on Retention has been incorporated in the evidence package including instructions for paper records (evidence E04 - E07) The Keeper agrees that The SG have a retention schedule that covers the records types created during the activities undertaken
6. Destruction Arrangements *Compulsory element*	**G**	**G**	Paper: All paper records are subject to secure disposal under contract to Shred-it. A sample destruction certificate has been provided to the Keeper as evidence that an arrangement with Shred-it is in place. Electronic: The corporate EDRM Objective automatically prompts the deletion of records at the end of their retention period. E-mail's are automatically archived by the Enterprise Vault and destroyed after 1 year. The procedure for this operation is explained to staff in *Scottish Government*

			Email Archiving Enterprise Vault (evidence E34). This guidance document features screen shots showing how the Vault works in practice. The Scottish Government is aware that there are legacy corporate records held electronically that do not form part of the EDRM. The Scottish Government's Information Services & Information Systems body are pursuing a project to manage these records. The Interim Project Board sets out proposals for destroying 'Non-Objective' electronic records and this proposal has been included as evidence in part two of the document *Interim Project Report Based Upon Initial Analysis (Includes Proposed Outline Project Plan)* (evidence 35). The Keeper has representation on the project board and should be kept up-to-date on progress. **(See *Archival Project and Non-Objective Information* under General Comments below)**. However the Keeper is content that the destruction arrangements for electronic records features in the RMP can be imposed when the project has identified records for destruction. Hardware: Computer media is disposed of securely through approved procedures using the Scottish Government contract with NVT. The equipment is destroyed by CCL North. A certificate of destruction from the latter has been supplied to show that these arrangements are in operation. Back-Ups: Back-up and destruction procedures have been supplied and state 'The Scottish Government do daily incremental backups and then at the weekend full back ups are taken of the system. The backups are then kept for four weeks and are then destroyed and the information then becomes irretrievable'. The Keeper agrees that the Scottish Government has arrangements in place to securely and irretrievably destroy records in all media when appropriate.

	G	**G**	
7. Archiving and Transfer *Compulsory element*	**G**	**G**	Scottish Ministers have a long-standing arrangement in operation whereby records for permanent preservation are deposited with the Keeper of the Records of Scotland. The service level agreement under which this transfer takes place has been provided as evidence and the operation has been confirmed by the Keeper's client managers. **(See *Archival Project and Non-Objective Information* under General Comments below)**. The Keeper agrees that the Scottish Government has proper archive and transfer arrangements in place as required by the Act.
8. Information Security *Compulsory element*	**G**	**G**	The Scottish Government has an Information Security Policy in place and a statement regarding this policy has been provided to the Keeper (evidence E12). The policy itself is at: **http://intranet/InExec/SEAndMe/IT/StrategiesPolicies/SecurityPolicy/Standards/infosps** All managers in the Scottish Government have a responsibility for implementing the security policy. The SIRO **(see element 1)** objectives have been included as evidence 02 and include : 'ensure corporate security policies are produced to ensure consistency across the organisation and compliance with relevant laws, regulations and IA standards'. The business classification scheme (see element 4 above) identifies the Information Asset Owner and allows control of access and security markings. Changes to the business classification scheme are controlled by formal policies. Information security is a major theme in the *Information Asset Owner – Handbook*

			(evidence E16). The Keeper agrees that the Scottish Government has an information security policy that is operational in the authority as required by the Act.
9. Data Protection	**G**	**G**	The Scottish Government has a current Data Protection Policy in place which has been provided to the Keeper (evidence E21) The Scottish Government has registered with the Information Commissioner: **Z4857137** This registration applies to the Scottish Government Directorates, the office of the Permanent Secretary, Disclosure Scotland, Student Awards Agency for Scotland and Transport Scotland. The RMP states that the eight non-Scottish Ministers authorities, listed above, are also covered by the Scottish Government Registration. However it is worth noting: that Accountant in Bankruptcy is registered separately: **Z5751396** Parole Board for Scotland (one of the eight non-Scottish Ministers Authorities): **Z7574031** The Scottish Government issue subject access request guidance which has been provided to the Keeper (evidence E24) Data protection is a theme of the *Information Asset Owner – Handbook* (evidence E16). Section 5.1 lists the compulsory training that Information Asset Owners and their staff undertake. This includes a 'tool' on the Data Protection Act. The Keeper agrees that the Scottish Government has understood their responsibilities under the Data Protection Act 1998.

10. Business Continuity and Vital Records	**G**	**G**	The Scottish Government operates a business continuity plan that includes records management. This involves regular back-ups **(see element 6 above – destruction of back-ups)**. The relevant business continuity plan has been provided to the Keeper (evidence E25). Details of continuity back-ups have been supplied and state 'The Scottish Government do daily incremental backups and then at the weekend full back ups are taken of the system. The backups are then kept for four weeks and are then destroyed and the information then becomes irretrievable'. There is a commitment to review the *Business Continuity Plan* annually. The Keeper agrees that the Scottish Government is covered by an operational business continuity plan that considers the recovery of records.
11. Audit trail	**G**	**G**	The main Scottish Government EDRM system, Objective, on which the business classification scheme rests imposes audit trail on electronic records automatically. Changes to the business classification scheme are controlled by formal policies. The Scottish Government operates a hybrid system; public records held in paper form or on drives outside the *Objective* system are referenced in *Objective* and are therefore traceable. Staff guidance regarding saving corporate e-mails to the relevant EDRM folders is included in the document *Scottish Government Email Archiving Enterprise Vault* (evidence E34) the Keeper commends this practice. Changes to the business classification scheme are controlled by formal policies.

			Sample extracts from the paper record system have been provided to the Keeper as evidence of an operational audit trail for records held as hard-copy (evidence E33). **(See *Archival Project and Non-Objective Information* under General Comments below)**. The Keeper agrees that the Scottish Government has mechanisms in place by which they can locate all records and determine that they are the correct version.
12. Competency Framework for records management staff	**G**	**G**	Records Management Competencies applying to the officer identified in element 2 have been supplied to the Keeper (evidence E28) along with a commitment to identify relevant training for this individual 'so that they can work towards obtaining a professional qualification'. The Keeper commends this commitment. Under 'Further Development' against this element, the Scottish Government are to look at records management training for appropriate staff. This will complement the training on the EDRM system and Protecting Information (mandatory), Data Protection and other staff training modules already in place. **The Keeper would like to be informed if a records management module is developed and, if possible, view that module.** Section 5.1 of the *Information Asset Owner – Handbook* (evidence E16) lists the compulsory training that Information Asset Owners and their staff undertake. Staff are provided with guidance on information sharing **(see element 14)**. The Keeper agrees that the person identified at element two has appropriate skills to implement the RMP and that the Scottish Government properly consider records management training for their staff.

	G	**G**	
13. Assessment and Review	**G**	**G**	It is a requirement of the Public Records (Scotland) Act 2011 that "An authority must— (a) keep its records management plan under review" (PRSA Part 1 5.1.a.) The introduction to the submitted plan commits the Scottish Government to review it annually 'or sooner if new legislation, codes of practices or national standards are to be introduced'. The RMP makes it clear that the Records Manager **(see element 2)** is responsible for this review. The review of the RMP will be reported to the Head of Information Management and Assurance (Ann Robertson). The Scottish Government Assessment and Review Process has been submitted as evidence 69. There is a commitment to review the *Records Management Policy* document **(see element 3)** and information security procedures regularly and the *Business Continuity Plan* **(see element 10)** annually. The Keeper agrees that the Scottish Government has arrangements in place to review the Records Management Plan as required by the Act.
14. Shared Information	**G**	**G**	The Scottish Government employs a standard data sharing agreement template (supplied as evidence E22) which includes information governance and security clauses section 6.1 and 6.2 of the guidance. The Keeper has been provided with a sample of a data sharing agreement (with Fire and Rescue) to show that this template is being used.

			Staff are provided with guidance on information sharing. The Keeper agrees that the Scottish Government properly considers records governance when undertaking data sharing projects.

Scottish Government (Part of 'Scottish Ministers')
Parole Board for Scotland
Scottish Agricultural Wages Board
Chief Dental Officer of the Scottish Administration
Chief Medical Officer of the Scottish Administration
Her Majesty's Inspector of Anatomy for Scotland
Her Majesty's Chief Inspector of Prisons for Scotland
Her Majesty's Inspectorate of Constabulary in Scotland
Her Majesty's Fire Service Inspectorate for Scotland

(For simplicity all these separately scheduled authorities will be described as 'The Scottish Government' in the assessment below)

General Notes on RMP, Including Concerns:

Meaning of 'Scottish Government' and 'Scottish Ministers': For the purposes of PRSA the term 'Scottish Ministers' refers to Scottish Government - Enterprise, Environment & Digital; Scottish Government - Finance; Scottish Government - Governance and Communities; Scottish Government - Health and Social Care
Scottish Government - Learning and Justice; Scottish Government - Office of the Permanent Secretary; Scottish Government - Strategy & External Affairs. It also refers to 8 executive agencies: Transport Scotland, Disclosure Scotland, the Scottish Prison Service, Accountant in Bankruptcy, Education Scotland, Student Awards Agency for Scotland, Scottish Public Pensions Agency and Historic Scotland.

Historic Scotland had its status, and structure, changed by a bill introduced in 2014. For this reason, the Keeper agrees that the current 'Scottish Ministers' submission does not have to include provision for the management of Historic Scotland's records.

The Records Management Plan assessed in this document does not include the records of the Scottish Prison Service, Scottish Public Pensions Agency, Education Scotland or Historic Scotland. At time of assessment, the Scottish Prison Service and Scottish Public Pensions Agency have had their separate RMPs agreed by the Keeper. Education Scotland have submitted their plan, but this is yet to undergo assessment.

Version

This assessment is on the *Records Management Plan* of the nine authorities listed on page 1. The *Plan* is dated June 2015.

The *Plan* is accompanied by a *Covering Letter* from Sarah Davidson, Director General Communities and Senior Information Risk Owner (SIRO) of the Scottish Government **(see element 1),** dated 25 June 2015, in which she expresses her support for the *Plan* and endorsement of the supporting policies.

The *Plan*, and records management generally has been promoted throughout the SG with an intranet article 'Drive to improve records management'. This was approved by the SIRO **(see element 1)**. A link to the article has been supplied as evidence 67.

Review of EDRM

The Scottish Government is currently reviewing the EDRM solution they use (*Objective*). It is possible that a new system will be adopted in the next five years, before the Keeper would naturally be revisiting this RMP. Quite properly, the RMP makes mention of this possibility under the elements that would be affected by a change in provider. The Keeper, clearly, should be notified if such a change takes place in order to keep the Scottish Government submission up-to-date.

Third Parties

The Scottish Government contracts out some of its functions to third parties Evidence that proper arrangements are in place to ensure that the terms of the RMP apply to these third parties has been provided to the Keeper (evidence 39 – 44 especially evidence 39 section 18).

Archival Project and Non-Objective Information

The *Records Management Plan* (page 10) states "At the moment we do not use retention and disposal schedules on shared drives, pts files [sic] and public folders, but we have started to a project recently to look at applying these to our information that does not form part of our corporate record. NRS are part of the board that has been set up for this project".

The Scottish Government's Information Services & Information Systems body are pursuing what they term an Archive Project to manage legacy electronic records held outwith the EDRM system - on the H drive, pst (Personal Storage Table) files, the G drive etc. The Project Proposal document and a Project Report (dated October 2013) have been included in the evidence package (E36 and E35).

Although the Scottish Government have declared that records affected by this project are not part of the "corporate record", the Act defines public records as being 'those created by or on behalf of the authority in carrying out its functions' (Part 1 3(1)). The Keeper therefore considers the information and records being managed under the Scottish Government 'Archive Project' as corporate for the purposes of the Act.

The Keeper also wishes to remind the Scottish Government of the procedures that are currently in place whereby the Keeper's Client Management Team are advised of the record types scheduled for destruction. This is done to ensure that material appropriate for permanent preservation can be safely transferred to NRS. The Keeper expects that the records covered by the Archive Project will be treated in the same manner and that destruction decisions are communicated to Neil Miller, Senior Inspecting Officer: neil.miller@nrscotland.gov.uk.

The Keeper understands that most of the records, when reviewed under the Archive Project, will be destroyed and he agrees that the Scottish Government has arrangements in place to carry out this destruction securely. However, while the Project is ongoing it is the Keeper's opinion that it represents an aspect of the records management provision in the Scottish Government and therefore is of legitimate interest to PRSA. He is happy to agree this specific project under 'improvement model' terms on the condition that he is kept up-to-date with progress.

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 authorities listed above. 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 following authorities**:

Scottish Government (Part of 'Scottish Ministers')
Parole Board for Scotland
Scottish Agricultural Wages Board
Chief Dental Officer of the Scottish Administration
Chief Medical Officer of the Scottish Administration
Her Majesty's Inspector of Anatomy for Scotland
Her Majesty's Chief Inspector of Prisons for Scotland
Her Majesty's Inspectorate of Constabulary in Scotland
Her Majesty's Fire Service Inspectorate for Scotland

The Keeper recommends that the Scottish Government 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,

…………………………………   …………………………………
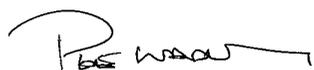
Pete Wadley   **Robert Fotheringham**
Public Records Officer   Public Records Officer

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 authorities listed below. In agreeing this RMP, the Keeper expects those authorities to fully implement the agreed RMP and meet its obligations under the Act.

Scottish Government (Part of 'Scottish Ministers')
Parole Board for Scotland
Scottish Agricultural Wages Board
Chief Dental Officer of the Scottish Administration
Chief Medical Officer of the Scottish Administration
Her Majesty's Inspector of Anatomy for Scotland
Her Majesty's Chief Inspector of Prisons for Scotland
Her Majesty's Inspectorate of Constabulary in Scotland
Her Majesty's Fire Service Inspectorate for Scotland

………………………………………….

Tim Ellis
Keeper of the Records of Scotland