

Public Records (Scotland) Act 2011

**Scottish Parliament
Scottish Parliamentary Corporate Body
Scottish Commission for Public Audit
Assessment Report**

The Keeper of the Records of Scotland

23 May 2014

Contents

1. Public Records (Scotland) Act 2011	2
2. Executive Summary	3
3. Authority Background	4
4. Assessment Process	5
5. Model Plan Elements: Checklist.....	Error! Bookmark not defined.
6. Keeper's Summary	22
7. Keeper's Determination	23
8. Keeper's Endorsement.....	24

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 Parliament, the Scottish Parliamentary Corporate Body and the Scottish Commission for Public Audit by the Public Records (Scotland) Act 2011 Assessment Team following its submission to the Keeper on 28 February 2014.

The assessment considered whether the RMP of the Scottish Parliament, the Scottish Parliamentary Corporate Body and the Scottish Commission for Public Audit 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 Parliament, the Scottish Parliamentary Corporate Body and the Scottish Commission for Public Audit complies with the Act can be found under section 7 of this report with relevant recommendations.

3. Authority Background

The Scottish Parliament is the devolved, national, unicameral legislature of Scotland, located in the Holyrood area of the capital, Edinburgh. The Parliament is a democratically elected body comprising 129 members known as Members of the Scottish Parliament (MSPs). Members are elected for four-year terms under the additional member system. As a result, 73 MSPs represent individual geographical constituencies elected by the plurality ("first past the post") system, with a further 56 returned from eight additional member regions, each electing seven MSPs.

<http://www.scottish.parliament.uk/>

The Scottish Parliament Corporate Body is responsible for ensuring that the Parliament is provided with the property, staff and services it requires.

<http://www.scottish.parliament.uk/abouttheparliament/16231.aspx>

The Scottish Commission for Public Audit was established under Section 12 of the Public Finance and Accountability (Scotland) Act 2000 and is made up of 5 MSPs. The main areas of responsibility of the Commission are to:

- (a) Examine Audit Scotland's proposals for the use of resources and expenditure and report on them to the Parliament;
- (b) Appoint a qualified person to audit the accounts of Audit Scotland;
- (c) Lay before the Parliament and publish a copy of Audit Scotland's accounts and the auditor's report on them;
- (d) Appoint three of the five members of Audit Scotland on such terms and conditions as the SCPA determines
- (e) Appoint one of these three members to preside at meetings of Audit Scotland.

<http://www.scottish.parliament.uk/parliamentarybusiness/1704.aspx>

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 Parliament, the Scottish Parliamentary Corporate Body and the Scottish Commission for Public Audit'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.
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5. Model Plan Elements: Checklist

Scottish Parliament Scottish Parliament Corporate Body Scottish Commission for Public Audit

(For ease these three scheduled authorities are referred to as ‘The Scottish Parliament’ below.)

Element	Present	Evidence	Notes
1. Senior Officer <i>Compulsory element</i>	G	G	<p>Callum Thomson, The Scottish Parliament’s Head of Communications and Research, is identified as the individual with overall responsibility for the Records Management Plan (RMP). Mr Thomson’s responsibility for records management in the authority is confirmed by the <i>Statement of Responsibility for Records Management</i> (evidence 06). In this statement Mr Thomson confirms that he fully endorses the records management plan.</p> <p>Callum Thomson is also the Senior Responsible Owner of the Document and Records Management (DRM) project (see <i>Maturity Model</i> under <i>General Comments</i> below). He reports to the Digital Parliament Programme Board, on which he sits, and to the Leadership Group (see <i>Digital Parliament Programme</i> under <i>General Comments</i> below).</p> <p>The Keeper agrees that the Head of Communications and Research in The Scottish Parliament is a suitable individual to be identified in this role.</p>

<p>2. Records Manager <i>Compulsory element</i></p>	<p>G</p>	<p>G</p>	<p>Gordon Hobbs, The Scottish Parliament's Information Manager is identified as the individual who has responsibility for the operational implementation of the plan.</p> <p>Mr Hobbs is the author of the RMP, the <i>Records Management Policy</i> (evidence 08) and the <i>Records Management Procedures and Guidance</i> document (evidence 12). This indicates that he has an understanding of key records management process within The Scottish Parliament.</p> <p>This appointment is confirmed by the <i>Statement of Responsibility for Records Management</i> (evidence 06), from Callum Thomson (see element 1) and from Mr Hobbs formal objectives which have been supplied to the Keeper (evidence 74)</p> <p>The Information Manager is responsible for records management training.</p> <p>Mr Hobbs holds an MSc in Information and Library Studies.</p> <p>The Keeper agrees that Mr Hobbs is a suitable individual to be identified in this role.</p>
<p>3. Policy <i>Compulsory element</i></p>	<p>G</p>	<p>G</p>	<p>The Scottish Parliament has a corporate <i>Records Management Policy</i> v1.0 approved by the Leadership Group on 1st March 2012. This policy has been submitted to the Keeper (evidence 08 for policy, evidence 11 for Leadership Group approval).</p> <p>The continuation of a <i>Records Management Policy</i> is a commitment of The Scottish Parliament's <i>Records Management Strategy</i> (evidence 09).</p> <p>The <i>Records Management Policy</i> specifically confirms that it applies to all three scheduled authorities: The Scottish Parliament, The Scottish Parliament Corporate Body and The Scottish Commission for Public Audit (page 2).</p>

			<p>The author of the <i>Records Management Policy</i> is the individual identified in element 2. It contains a foreword by the Clerk/Chief Executive of the Scottish Parliament.</p> <p>The policy is strongly supported by staff guidance in the form of <i>Records Management Procedures and Guidance</i> document v1.0 dated June 2012 (evidence 12).</p> <p>The policy includes a section outlining responsibilities.</p> <p>There is a commitment to review the policy every three years in conjunction with retention schedule reviews (see Review under General Comments below).</p> <p>The policy document is available to staff on their Intranet. It does not appear to be publically available from the Scottish Parliament website. A screen-shot from the records management section of the Intranet has been submitted to the Keeper (evidence 84)</p> <p>The Keeper agrees that The Scottish Parliament has an operational and approved records management policy as required by the Act.</p>
4. Business Classification	A	A	<p>The Scottish Parliament has a file plan showing function and activity for the entire business. This has been provided to the Keeper (evidence 17). Workshops have been held in local service areas helping develop this file plan. The practice of engaging local areas in this way is commended by the Keeper has helping develop a useful business tool.</p> <p>‘The majority of records created by the Scottish Parliament are in electronic form’ (RMP page 7). These records are held in structured drives and in some cases on a new EDRM system. This system, SharePoint with a bolt-on, is being rolled out</p>

			<p>throughout the authority and a pilot project is underway. (see <i>Maturity Model under General Comments below</i>) The RMP states that the proposed Document and Records Management (DRM) project business classification ‘will enable the context of each record and its relationship to other electronic records to be understood through classification’ (page 8). The Head of Communications and Research (see element 1) heads the DRM project and sits on the Digital Parliament Programme Board that reports to the senior management ‘Leadership Group’.</p> <p>The Scottish Parliament also holds records in paper form and notes in the <i>Records Management Procedures and Guidance</i> document (page 7) that they will continue to do so when the EDRM system is completely rolled out, for example in the cases where an original signature must be kept for legal reasons. Some paper records are held off-site with a third party storage provider (details of this arrangement have been supplied to the Keeper and are agreed). Guidance for staff on the use of this store is provided in <i>Records Management Procedures and Guidance</i> document (see <i>Records Management Procedures and Guidance under General Comments below</i>)</p> <p>Under phase one of the DRM project, the Scottish Parliament set up local records management champions. The Keeper commends this practice in larger organisations (<i>Records Management Policy</i> page 3). The local champions are appointed by local management. The training presentation for these local champions has been provided to the Keeper (evidence 79). Local champions are on hand to assist other staff with records management processes such as the proposed annual records review (<i>Records Management Procedures and Guidance</i> page 13)</p> <p>It is not thought that The Scottish Parliament contracts out any of its <u>functions</u> to third parties.</p>
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			<p>The Keeper agrees this element of the Scottish parliament’s RMP on ‘improvement model’ terms. This means that he is convinced of the parliament’s commitment to implement the EDRM solution fully over time, but would request that he is updated as this project progresses.</p>
<p>5. Retention schedule</p>	<p>G</p>	<p>G</p>	<p>The Scottish Parliament has a <i>Retention Schedule</i> covering all the activities listed in the <i>Business Classification Scheme</i> (see element 4). The full schedule has been supplied to the Keeper (evidence 18). The <i>Retention Schedule</i> was developed in phase one of the records management project (see <i>Maturity Model</i> under General Comments below)</p> <p>Currently, each service area is encouraged to set aside time to review the records annually alongside the retention schedule with a mind to approve destruction (<i>Records Management Procedures and Guidance</i> page 13). A decision to retain records beyond their allocated retention period is relayed to the Information Manager through an Intranet form.</p> <p>The RMP states that the proposed Document and Records Management (DRM) project ‘will enable the automatic application of retention rules based on pre-defined criteria tailored to the type of content.’</p> <p>The <i>Records Management Strategy</i> (evidence 09) commits The Scottish Parliament to define how long it needs to keep particular records.</p> <p>There is a commitment to review the <i>Retention Schedule</i> every three years in conjunction with the <i>Records Management Policy</i> (see <i>Review</i> under General Comments below).</p> <p>The Keeper agrees that The Scottish Parliament has a functioning retention schedule that appears to cover all the record types created as the authority carries</p>

			out its functions.
6. Destruction Arrangements <i>Compulsory element</i>	G	G	<p><u>Paper</u>: Paper records are destroyed on-site by a contractor. Evidence has been supplied to demonstrate that proper arrangements are in place. Paper records held off-site are destroyed locally. Again evidence has been provided that secure irretrievable destruction takes place. Contractual details regarding off-site destruction include business continuity back-up tapes. A permanent log of destroyed material is kept.</p> <p><u>Electronic Records</u>: Currently a manual log of destroyed electronic records is kept and evidence of this process has been supplied to the Keeper as has a sample records destruction form (evidence 22). The procedures for the irretrievable destruction of electronic records, including e-mail, are available for staff in <i>Records Management Procedures and Guidance</i> (see <i>Records Management Procedures and Guidance</i> under <i>General Comments</i> below)</p> <p>The DRM system will introduce automatic retention prompts. Once the DRM project is complete, the metadata of disposed records will be permanently recorded in the system.</p> <p>Currently, each service area is encouraged to set aside time to review the records annually alongside the retention schedule with a mind to approve destruction (<i>Records Management Procedures and Guidance</i> page 13).</p> <p><u>Hardware</u>: Evidence has been provided detailing the arrangements in place to ensure the irrevocable deletion of information held on Scottish Parliament hardware scheduled for disposal in the form of a <i>Specification For The Provision Of Recycling And Disposal Of It Equipment And Accessories</i> (evidence 80)</p> <p><u>Back-Ups</u>: Electronic records are backed-up to an external Network for short term</p>

			<p>recovery and to nightly back-up tapes. The destruction of these back-up copies is built into the business continuity procedures and outstore contract.</p> <p>The RMP states that the proposed Document and Records Management Project destruction arrangements ‘will ensure destruction of all copies of electronic records by a secure, audited mechanism by approved staff.’</p> <p>One of the policy objectives set out in The Scottish Parliament’s corporate <i>Records Management Policy v1.0</i> (evidence 08) refers to the disposal of records in accordance with the defined processes when they are no longer required.</p> <p>The <i>Records Management Strategy</i> (evidence 09) commits The Scottish Parliament to define how long it needs to keep particular records, will dispose of them when they are no longer needed and will be able to explain why records are no longer held.</p> <p>The Keeper agrees that the Scottish Parliament properly considers the irretrievable destruction of its corporate records as required by the Act.</p>
<p>7. Archiving and Transfer <i>Compulsory element</i></p>	<p>G</p>	<p>G</p>	<p>The Scottish Parliament transfers their records to the National Records of Scotland for permanent preservation. This arrangement is confirmed by NRS client managers.</p> <p>The RMP states the proposed Document and Records Management (DRM) project archiving and transfer arrangements ‘will enable records to be transferred to the National Records of Scotland in a reusable format compliant with MoReq, along with their associated metadata.’</p> <p>The Keeper agrees that The Scottish Parliament has arrangements in place to transfer records to an appropriate archive.</p>

<p>8. Information Security <i>Compulsory element</i></p>	<p>G</p>	<p>G</p>	<p>The <i>Records Management Strategy</i> (evidence 09) commits The Scottish Parliament to ensure that records are stored securely and that access to them is controlled.</p> <p>The Scottish Parliament has an operational information security policy dated September 2013. This has been supplied to the Keeper (evidence 28) It is supported by a suite of security documents which have also been provided (evidence 29 – 48)</p> <p>The Head of Business IT is the owner of the Information Security system.</p> <p>The RMP states that the proposed Document and Records Management (DRM) project ‘will enable the prevention of unauthorised destruction, alteration or removal of electronic records.’ This project will also see the introduction of an upgraded protective marking scheme for electronic records.</p> <p>Information Security is reviewed periodically by Business IT management group. The Keeper would like to see the revised policies and procedures after the full DRM system has been embedded.</p> <p>The Keeper agrees that The Scottish Parliament have properly considered the security of their records.</p>
<p>9. Data Protection</p>	<p>G</p>	<p>G</p>	<p>The Scottish Parliament have a <i>Data Protection Policy</i> which is available to the public through a link from their website http://www.scottish.parliament.uk/help/19146.aspx</p> <p>The authority is registered with the Information Commissioner – Z7477607</p>

			<p>The Scottish Parliament has provided the Keeper with staff instructions for handling subject access enquires (evidence 50).</p> <p>Members of staff at The Scottish Parliament undergo training on data protection. A presentation has been provided as evidence (evidence 57)</p> <p>The Scottish Parliament <i>Data Sharing Guidance</i> (evidence 58) specifically mentions data protection. The RMP mentions the risks of keeping records beyond business use under data protection legislation (page 7).</p> <p>The description of data protection provision in The Scottish Parliament as it appears in the RMP (page 24) refers to a 'Head of Information Governance' a role not mentioned elsewhere in the plan. The Head of Information Governance recently took over line management of the Information Manager. The Head of Information Governance reports to the Head of Communications and Research and is responsible for delivering expertise, advice, guidance and training on all aspects of information governance including data protection, freedom of information and copyright.</p> <p>The Keeper agrees that The Scottish Parliament properly recognise their responsibilities under the Data Protection Act 1998.</p>
<p>10. Business Continuity and Vital Records</p>	<p>G</p>	<p>G</p>	<p>The Scottish Parliament has a series of local business continuity plans. The template (excel spreadsheet) to be followed by each area has been supplied to the Keeper in evidence.</p> <p>Electronic records are backed-up to an external Network for short term recovery and to nightly back-up tapes. The destruction of these back-up copies is built into the business continuity procedures.</p>

			<p>Vital records needed for the resumption of critical business have been considered in a general salvage plan (evidence 66)Vital records were identified in Phase Two of the Records Management project (see Maturity Model under General Comments below) A heritage Salvage Plan, building on this, is in development. The Keeper requests sight of this when available. The Keeper would like to assure The Scottish Parliament that all documents submitted in evidence are held securely by NRS and access is strictly limited to the PRSA Assessment Team, the Head of Government Records and himself.</p> <p>The Keeper agrees that The Scottish Parliament has operational business continuity plans that properly consider the recovery of records in an emergency. He also agrees that consideration has been given to the security of 'vital records'.</p>
11. Audit trail	A	A	<p>The Scottish Parliament's corporate <i>Records Management Policy v1.0</i> (evidence 08) explains the importance of an audit trail for efficiency and legal requirements. It refers to version control. Furthermore the <i>Records Management Strategy</i> document commits the Parliament to 'know what records it holds and where they are' (evidence 09)</p> <p>The Scottish Parliament does not yet have a fully realised document tracking facility for all records, particularly in the case of electronic records that have yet to be encompassed by the EDRM system (SharePoint with a bolt-on). The Keeper is convinced that a commitment has been made to rectify this situation in the next five years as part of a structured project (DRM). The RMP states that the proposed DRM project Audit Trail facility 'will enable the creation and maintenance of complete and accurate representations of all changes that occur in relation to a particular record.' (page 8) Metadata will be automatically created to best practice e-Government standards.</p>

			<p>The reporting procedure for this project is clearly stated in the RMP. The Head of Communications and Research (see element 1) heads the DRM project and sits on the Digital Parliament Programme Board that reports to senior management 'Leadership Group'.</p> <p>When the DRM project rolls out the EDRM to all service areas many of the features of a robust record tracking will be imposed by the system and an audit trail will be automatically created (see Maturity Model under General Comments below).</p> <p>The Scottish Parliament will continue to create paper records when the EDRM system is completely rolled out, for example in the cases where an original signature must be kept for legal reasons. Clear instructions have been provided to staff in the <i>Records Management Procedures and Guidance</i> document (page 7) regarding the procedure for naming paper files to allow accessibility and version control. The tracking of paper records held in the third party outstore seems robust. Guidance for staff on the use of this store is provided in <i>Records Management Procedures and Guidance</i> document.</p> <p>It is possible that the paper records held internally could be managed through the EDRM system. This will be investigated under a 'planned activity' (RMP page 15).</p> <p>The <i>Records Management Procedures and Guidance</i> document provides guidance on naming pattern for electronic and paper records, on version control, on the format for saving e-mails and on the annual review of record. (See Records Management Procedures and Guidance under General Comments below). This guidance establishes the importance of 'audit trail' in a healthy records management system.</p> <p>In several places the RMP and evidential documents mention the risks of using the e-mail system (Outlook) as a personal records management system (i.e. RMP page</p>
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			<p>7, <i>Records Management Procedures and Guidance</i> page 13). Similarly, the dangers of a 'parallel filing system' (for example a paper version and an electronic version of the same record) are recognised (i.e. <i>Records Management Procedures and Guidance</i> page 8).The Keeper concurs with these warnings.</p> <p>The Keeper agrees this element of The Scottish parliament's RMP on 'improvement model' terms. This means that he is convinced of the parliament's commitment to implement an audit trail alongside the EDRM fully over time, but would request that he is updated as this project progresses.</p>
<p>12. Competency Framework for records management staff</p>	<p>G</p>	<p>G</p>	<p>Gordon Hobb's (see element 2) job specification and performance appraisal, both identifying records management as a separate competency, have been supplied. The performance appraisal specifically mentions PRSA.</p> <p>The RMP states that the performance management system personal development plan provides resources for appropriate training for the Information Manager. Mr Hobbs holds an MSc in Information and Library Studies.</p> <p>The <i>Records Management Strategy</i> (evidence 09) commits The Scottish Parliament to have in post 'an appropriately qualified records manager and a community of champions'.</p> <p>Members of staff at The Scottish Parliament undergo training on data protection. A presentation has been provided as evidence (evidence 57)</p> <p>The Information Manager is responsible for records management training. A training presentation for local champions has been provided to the Keeper (evidence 79) and a plan for a training day (evidence 78). Workshops have been held in local service areas helping develop a file plan.</p>

			The Keeper agrees that the individual identified as having day-to-day responsibility for implementing the RMP has appropriate skills for the role. Furthermore, the Keeper acknowledges that The Scottish Parliament considers records management training for appropriate staff.
13. Assessment and Review	G	G	<p>The Scottish Parliament implemented a self-assessment programme based on the JISC Infonet. From this maturity model, supplied to the Keeper as evidence 01, they have developed a 3 phase improvement plan which is currently underway – phases one and two being complete. This is clearly explained in the RMP (see <i>Maturity Model</i> under General Comments below)</p> <p>Information Security is reviewed periodically by Business IT management group.</p> <p>The RMP will be reviewed every three years. Several other submitted evidential documents, such as the <i>Records Management Policy</i>, are scheduled for review (see <i>Review</i> under General Comments below)</p> <p>The Keeper agrees that The Scottish Parliament is committed to keeping the RMP and the supporting evidence under review.</p>
14. Shared Information	A	A	<p>The <i>Maturity Model</i> (evidence 01) shows that, while there is a clear understanding that record governance is a vital element in data sharing, certain protocols remain to be put in place.</p> <p>‘Planned Activity 14.2’ commits The Scottish Parliament to impose management controls when sharing records with third parties. The Keeper requests that he is kept up-to-date on this important project.</p> <p>In the case of ‘Records created in the course of collaborative working or through outsourcing’ The <i>Records Management Strategy</i> (evidence 09) commits The</p>

			<p>Scottish Parliament to 'ensure that records shared with other bodies or held on their behalf by other bodies are managed in accordance with recognised standards',</p> <p>The Scottish Parliament <i>Data Sharing Guidance</i> (evidence 58) specifically mentions data protection.</p> <p>The Keeper agrees this element of The Scottish Parliament's RMP on 'improvement model' terms. This means that he is convinced of the parliament's commitment to develop firm records governance procedures for data sharing over time, but would request that he is updated as this project progresses.</p>
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General Comments:

**Scottish Parliament
Scottish Parliament Corporate Body
Scottish Commission for Public Audit**

(For ease these three scheduled authorities are referred to as ‘The Scottish Parliament’ below.)

The RMP, created by Gordon Hobbs the Scottish Parliament’s Information Manager (see element 2), is v2.0 an amended version of that which the Head of Communications and Research (see element 1) approved 26th February 2014. The Plan makes clear that it applies to The Scottish Parliament, The Scottish Parliament Corporate Body and The Scottish Commission for Public Audit. The plan is accompanied by a Statement of Responsibility, dated 29th April 2014, from both Mr Hobbs and from Callum Thomson, Head of Communications and Research (evidence 06). This statement acknowledges the importance of records to the business of the three scheduled authorities and that it is ‘a key element of the Information Management Strategy’ (introduction page 4). The RMP indicates the direct link between the work of the Information Manager and the Head of Communications and Research. The introduction to the RMP reiterates the principle of continuous improvement and much of the submitted evidence links to a self assessment Maturity Model (**see *Maturity Model* below**) this model is submitted to the Keeper as evidence 01.

The RMP mentions PRSA (page 8)

Records Management Procedures and Guidance

A key piece of evidence is *Records Management Procedures and Guidance*, dated June 2012 (submitted as evidence 12). This is a method by which records management is explained to staff at The Scottish Parliament and therefore is a key business tool. The guidance includes instructions regarding naming conventions, version control and secure destruction. It also recommends that staff should ‘review the files you have ownership of at least once a year.’ There is also a section on ‘Managing e-mail as records’ (page

13). This demonstrates a recognition that the functionality of e-mail brings with it distinct records management issues. The Keeper commends this entire document.

Maturity Model

In 2007, the Scottish Parliament implemented a self-assessment programme based on the JISC Infonet. From this maturity model, supplied to the Keeper as evidence 01, they have developed a 3 phase improvement plan which is currently underway – phases one and two being complete. This is clearly explained in the introduction to the RMP in a ‘background’ section.

Much of the remaining work on this improvement programme hinges on the imposition of an EDRM solution based on SharePoint with a bolt-on. This solution is being piloted in certain service areas, described in the RMP as a ‘pioneer project’. The Leadership Group (senior management of the Scottish Parliament) has approved the progression of this project on to the next stage. This approval and the instigation of a pilot project are accepted by the Keeper as evidence of a firm commitment to close a recognised gap in provision. This allows him to agree certain parts of the RMP (elements 4 and 11) under the terms of an ‘improvement model’. This means that he is happy to agree these elements of the RMP **on the understanding that he will be kept informed of developments as the records management provision ‘improvement’ project progresses.**

Records Management Project updates are published online by the Leadership Group for example:

http://www.scottish.parliament.uk/LeadershipGroup/LG_2013_Paper_071_-_Documents_and_Records_Management_Project.pdf
(Approval for the ‘pioneer project’)

Dependant on the results of the pilot and on Leadership group agreement the proposed date for full roll out will be in 2016.

The adoption of the EDRM will support the ‘Delivering a Digital Parliament’ corporate target that appears in the top-level *Strategic Plan* (evidence 02)

Review

Several of the submitted documents have already been scheduled for review, for example the *Records Management Policy* in 2015. The Keeper commends this forward planning and **requests that updated documents are submitted to him in order to keep The Scottish Parliament's evidence package up-to-date.** The RMP states 'The procedures and guidance will be updated following completion of the DRM pioneer project and prior to wider roll-out of the DRM system across the Scottish Parliament'. It may be that, because of this documents are renewed outside their normal review schedule. **See also Maturity Model above.**

Digital Parliament Programme

The Document and Records Management Project is a 'deliverable' of the Digital Parliament Programme headed by Michelle Hegarty, Assistant Clerk/Chief Executive of the Parliament. Until recently Ms Hegarty was senior responsible officer for the RMP and the Keeper therefore acknowledges that she brings considerable understanding of PRSA to her vital new post.

6. Keeper's Summary

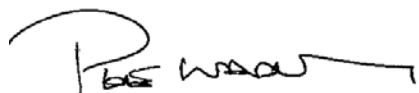
Elements 1 - 14 that the Keeper considers should be in a public authority records management plan have been properly considered by the Scottish Parliament, the Scottish Parliamentary Corporate Body and the Scottish Commission for Public Audit. Policies and governance structures are in place to implement 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 Parliament, the Scottish Parliamentary Corporate Body and the Scottish Commission for Public Audit**

- The Keeper recommends that the Scottish Parliament, the Scottish Parliamentary Corporate Body and the Scottish Commission for Public Audit should publish their 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 Parliament, the Scottish Parliamentary Corporate Body and the Scottish Commission for Public Audit. In agreeing this RMP, the Keeper expects the Scottish Parliament, the Scottish Parliamentary Corporate Body and the Scottish Commission for Public Audit to fully implement the agreed RMP and meet their obligations under the Act.



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Tim Ellis
Keeper of the Records of Scotland