

31 May 2012

Summary of the fourth meeting of the Public Records (Scotland) Act 2011 Stakeholder Forum held on 31 May 2012.

New Register House, West Register Street, Edinburgh

The following organisations were represented:

Archivists of Scottish Local Authorities Working Group (ASLAWG); The Association of Chief Police Officers in Scotland (ACPOS); Audit Scotland; Barnardo's Scotland; City of Edinburgh Council; Clackmannanshire Council; Dumfries and Galloway Council; East Ayrshire Council; Grampian Police; Historic Scotland; Improvement Service; Information and Records Management Society; Mental Health Tribunal for Scotland/Scottish Tribunals Service; Midlothian Council; National Museums of Scotland; NHS Greater Glasgow and Clyde; Perth and Kinross Council; Quarriers; Registers of Scotland; Scottish Borders Council; Scottish Council on Archives; Scottish Court Service; Scottish Enterprise; Scottish Environment Protection Agency (SEPA); Scottish Government Health and Social Care; Scottish Government Information Systems and Information Services (ISIS); Scottish Natural Heritage; Scottish Qualifications Authority; South Lanarkshire Council; Strathclyde Police; Survivor Scotland; West Lothian Council (32 bodies)

Apologies were received from:

Crown and Procurator Fiscal Service; Glasgow City Council; Kibble; Looked After Children and Young People; Lothian and Borders Police; National Convenor of Children's Hearings Scotland; NHS Education for Scotland; Scottish Children's Reporter Administration; Scottish Parliament Corporate Body; Scottish Women's Aid

National Records of Scotland (NRS) were represented by:

Susan Corrigan, Head of NRS E-Records Unit
Bruno Longmore, Head of Government Records
George MacKenzie, Keeper of the Records of Scotland and Registrar General
Neil Miller, Inspecting Officer
John Simmons, E-Records Advisor
Heike Vieth, Inspecting Officer
Pete Wadley, Public Records Officer
Andy Wells, Public Records Assistant
Ava Wieclawska, NRS Records Manager

1. Welcome and Introduction

George MacKenzie, Keeper of the Records of Scotland, welcomed delegates to the meeting.

He provided some background: the Bill received Royal Assent in April 2011, from June to December 2011 there had been a series of Stakeholder Group meetings,

and the formal public consultation for the Model Plan and Guidance Document concluded on 18 May 2012.

The purpose of today's meeting was to give an update on the consultation, hear about the responses received and proposed new developments, We also hoped to gather any further ideas from Stakeholders.

He emphasised what Ministers said during the course of the Bill through Parliament – this is a process of continuous engagement that seeks improvement from within organisations rather than imposing it from above - and that our aim is to aid change and spread good practice. Today's meeting was further evidence of this continuing engagement process in operation.

2. Introduction and Update

Bruno Longmore, Head of Government Records provided an update and outlined the plan for the day:

The formal consultation on the Model Plan and guidance concluded on Friday 18 May and we have pulled together some of the preliminary findings.

In total we had 46 responses prior to closure, a very respectable figure for a consultation on a very technical matter. We are still receiving responses – up to 51 at last count - all will be given full consideration as the Keeper values all views.

At the last Forum meeting in December 2011 we discussed proposals for assisting authorities with further guidance - beyond the statutory guidance just consulted on. John Simmons of the NRS E-Records Unit will outline a new product - the newly published elements of the 'Electronic Records Guidance' - aimed at assisting authorities with the increasing challenge of handling e-records. It will be a dynamic element, part of the suite of guidance that the Keeper intends to develop.

NRS receives records from stakeholder bodies who are our clients. Many are listed on the Schedule to the Act which has certainly stimulated our client activity – we have seen a 30% rise in the last year. Neil Miller of Government Records Branch will talk about client management and what our client managers can do to assist.

Dr Irene O'Brien, Chair of the Scottish Council on Archives will discuss the latest developments for the Framework for Contractors. There has been some exciting work done here by SCA in partnership with Quality Scotland, to develop further the ARMS self-assessment tool as an on-line option.

We will discuss the future timetable, elements of responses that may be developed further and canvass views on specific issues by way of an open panel session.

3. Report on the public consultation on the Model Plan and Guidance Document and issues raised in the responses.

Pete Wadley, Public Records Officer discussed the consultation on the model plan and guidance document drafted with stakeholders.

Some of the forum sat on stakeholders' sub-groups to work on particular problems. Those who attended the full forum meeting in December saw version 3 of the model plan with changes made by stakeholders. This report was therefore about the consultation on the documents that we all created.

Pete presented a selection of issues that seemed to come up repeatedly with suggested responses to them. Not every issue raised was mentioned but they could be further discussed in the open panel question session.

46 responses were received by the close of the consultation.

The main points to the 12 questions posed were:

Q1 - usefulness of the Model Plan? - 45 thought it useful or very useful.

Q2 – any elements missing? – 17 said yes, many referring to EDRM.

Q7 – number of sample documents? –3 who said there were 'too many' and 3 for 'too few'.

Q8 – Evidence? – Responses were very clear:

Evidence

Consultation comment:

"This would be very helpful to gauge the resource required to prepare a submission. We have experience of receiving evidence submissions and know that different organisations will interpret differently both the nature and extent of the evidence that might be required. It would be beneficial for both the providers and recipients of such evidence to define what is necessary in more detail."

This is the requirement for more examples of acceptable evidence to be added to each model plan element.

The responses have not been unanimous. Three local authorities said 'no because it might lead to the plan being more prescriptive'. However, the 38 to 7 majority in favour of more evidence suggest that this cannot be ignored. Therefore we will be adding these because the consultation has clearly indicated a desire for this extra help.

The plan will not be prescribing what evidence public authorities MUST submit, just examples of what might suffice. We don't need all the examples - we don't need to see five pieces of evidence when one good one will do.

Key evidence will be the Chief Executive Officer's (CEO) sign off.

This level of sign off is required by the Act and therefore is considered a compulsory element - as against a recommended element – it will also be accepted as evidence that an authority's RMP is, or will be, implemented. This is particularly important when other evidence cannot be supplied for security reasons. For example if a police force is not able to pass their business continuity plan to us because the information it contains is sensitive and restricted, a statement from the chief constable explaining that this is the case would be acceptable under the spirit of the Act.

There is a great difference between a RMP saying 'We have a business continuity plan, but you can't see it' and a RMP simply not mentioning this element at all.

Functions carried out by third parties

Consultation comment:

"The RMP and associated guidance could usefully be strengthened by the development of standards for each element outlining the minimum expectations...this...would enable public authorities to feel more confident in agreeing that the records management procedures of contractor agencies are fit for purpose. This would address many of the concerns held by voluntary agencies regarding the potential need to work to a number of different plans."

The Act makes clear that functions of a public authority contracted out to non-public bodies should be covered by the records management plans of the public authority. Stakeholder sub-group 2 was set up to provide tools that might allay the two principle concerns regarding this:

1. That contractors might be faced with different requirements from different authorities.
2. That it may be difficult, particularly for a small organisation, to determine what a minimum standard of records management provision actually is.

Tools have now been created by the stakeholder sub-group and the work of individual stakeholders, the Scottish Council on Archives (SCA) and local authority solicitors (SOLAR).

Priorities

Consultation comments:

"Some indication of the relative priorities of the various elements would have been helpful to aid implementation planning."

"It would be good if the compulsory elements of the records management plan were highlighted"

We will further highlight the elements that are required under the act.

We are not in a position to dictate the order that an authority should go about their plan. The model plan is in an unofficial order as it stands, putting staff and management in place then creating a business classification scheme, retention schedule etc.

A sample plan

Consultation comments:

"It may be helpful for the Keeper to provide a template records management plan which smaller authorities could use as the basis for their own plans."

"The only sample document which I feel is missing is a copy of a 'real' active approved plan."

The model plan shows the principles of a complete RMP as a series of key elements in the form of an annotated list. The spirit of this process is not in favour of the Keeper prescribing exactly what a RMP should look like. However, several responses suggested that we should provide a concrete example. What seems most welcome is an example of a RMP already agreed by the Keeper.

There are three reasons why we are reluctant to provide a prescribed template:

1. Any sample plan would only be of use to similar organisations. If we produced a 'made-up' police plan it might not suit the NHS. If we produced an NHS plan it might not suit local government.
2. If we produced a blank template for authorities to fill in this might threaten to turn this process into exactly what the Act wanted to avoid: a bureaucratic hoop to be jumped through and then forgotten. It is important that authorities are not left trying to shoehorn their records management system into a prescribed template.
3. We don't have one! Also we can't formally agree anything until the act is fully implemented next year.

However, the issue of us providing further help is a real one that has come up enough times in consultation to require a response. We will suggest further steps that we might take to address this issue.

Keeper certifying samples

Consultation comment:

"While no issues are identified with the specific guidance/best practice cited, it is not clear that example documents have been selected on the basis of merit, or on the advice of subject expertise. The criteria used to review and approve these links have not been published."

Certain responses asked if the appearance of a sample, or a link, in the guidance document, means that the Keeper is officially recommending these as best practice. No he is not.

Samples of documents provided reflect those that are currently used by Scottish Public Authorities and work for them. If they appear useful an authority can adopt them or, if not, use the guidance links to other 'best practice' guidance available on line. It is not for the Keeper to formally certify the quality of

documents created by other public authorities or suggest one best practice system over another.

However, an authority adopting a sample document as its own (as long as it is appropriate to that authority's specific business) would go some way to ensuring the Keeper's agreement of a plan.

Data Protection

Consultation comment:

"The inclusion of the element on Data Sharing is perhaps superfluous since the subject should largely be covered within an organisation's Data Protection policy."

I would like to address the subject of evidence relating to data protection: it is understood that authorities holding personal information on identifiable living individuals should register with the Information Commissioner. Proof of this registration would be acceptable as evidence that DP is properly being considered by the authority. Many authorities have DP or privacy statements on their websites. This may include information about making subject access requests. These published documents would also constitute evidence that DP is being considered.

As to the overlap between data protection and data sharing: The shared information element comes directly from stakeholders, from issues raised at the first forum meeting a year ago. The sharing of sensitive information covers much more than just DP issues, as does the responsibility for records created on a shared platform perhaps as part of a short term project.

Audit Trail

Consultation comments:

"The obligations imposed by Element 11, relating to Audit trails, seem relatively opaque.

The use of the word "transaction" is problematic. "Transaction" could be taken to mean, for example, the process of opening an electronic record, reading its contents, and then closing it again."

This element is now doing something that we had not intended. The element is about locating a document and ensuring that changes are recorded. It should not be interpreted as recording every time someone looks at a document. The wording of this element has been found wanting by several respondents and will be changed. We will submit a new text of Element 11 to all stakeholders for comment.

We want to highlight the importance of version control and the importance of following record movement (either paper or electronic format). Element 11 should not indicate a requirement to track who has accessed a document.

Improvement model

Consultation comment:

“All the elements are suitable but authorities will vary immensely on levels of provision and the elements should be considered long term goals and aspirations.”

The Keeper has always made it clear that he does not expect all public authorities to have a complete records management system in place immediately or even soon. One of the advantages of this process is that the Keeper is free to agree a reasonable improvement programme if it is submitted as part of an RMP. The self assessment tools included in the Guidance Document should help an authority determine where it is now in the matter of records management provision and where it aspires to be. The honest acknowledgement of this gap and a determination to close it will be good for the business of the authority and as such will be considered ‘good records management practice’ by the Keeper. We can certainly emphasise this in the introduction to the model plan if stakeholders consider that we have not done so sufficiently.

The Act is about installing an ethos that appreciates the value of good records management in the Scottish public authority community.

EDRM

Consultation comment:

“Although the document states “The scope of the Model Plan applies to all records irrespective of the technology used to create and store them or the type of information they contain.” more examples of electronic information management would be beneficial.”

Several responses commented that we did not do enough about digital records in the model plan.

After stakeholder consultation, including a ‘conversation’ on the Communities of Practice discussion board, it was decided to drop electronic records as a separate element. That does not mean we are not responding to the issue.

4. The NRS e-Records guidance

John Simmons discussed the NRS E-Records Guidance which was launched today. He reiterated that this guidance has been provided to support public authorities who are working towards compliance with the Public Records (Scotland) Act 2011 and the content should be read alongside the wider guidance on records management which will be provided on the NRS website.

The primary audience for this guidance is the Scottish public sector, but principles and practices outlined are relevant to all organisations and are not public body specific.

A brief overview of each subject is provided, together with links to more detailed guidance and other resources, drawn from external sources.

Content so far...

Starting Points for Electronic Records Management

Simple Ways to Improve How You Manage Your Electronic Records

Electronic Records Management (ERM) Systems

Standards and Requirements for Electronic Records Management

Electronic Records Glossary

Looking ahead the NRS E-Records Unit would like to hear from stakeholders:

Looking ahead...

Guidance on further areas will be added. Possible topics:

- Managing Email
- Using SharePoint for records management
- Recordkeeping in the Cloud
- Digital Resilience and Digital Preservation
- Case Studies from the Scottish public sector

What we would like to hear from you:

- feedback on current content
- recommendations on other external resources to link to
- suggestions for new topics to cover
- potential case studies

There would be a new website in the autumn, but the current contact email address for comments is: eRecordsUnit@nas.gov.uk

Field Code Changed

5. NRS as a place of deposit: an introduction

Neil Miller, Inspecting Officer at NRS discussed NRS as a place of deposit:

Introduction

The Forum meeting acts as a good opportunity to reach a large number of stakeholders. Neil explained the role of NRS Inspecting Officers, what they can do to help clients and potential clients, and how the Public Records (Scotland) Act affects this.

Clients

NRS uses the term 'clients', meaning public authorities whose records are transferred to NRS for permanent preservation.

Who are our clients?

We have received government records for permanent preservation for many years, and several of the Forum stakeholders are already our clients. The bodies we deal with are found amongst Scotland's national public bodies and include the SG and other public bodies including NDPB's, public corporations, executive agencies, non ministerial departments etc.

Many of the Forum's stakeholders - for example, local authorities - already have archiving arrangements with other repositories. What NRS can provide won't be directly relevant to them but similar principles apply.

Client management

Within NRS there is a small team of Inspecting Officers who act as 'client managers'. Each public authority is assigned an NRS Inspecting Officer as their client manager. As client managers we are their main point of contact and to help with general records management issues. We can be good sounding boards, for example, but we primarily focus on:

- working with clients to select records for permanent preservation;
- managing the transfer of these records to NRS;
- dealing with any issues which arise relating to records which have already been transferred

Which records are worthy of permanent preservation?

A very small number of an organisation's records are worthy of permanent preservation. As a headline figure, experience from one of our largest clients has shown that only 1-2% of the total records they create have enduring value and should be preserved permanently.

How are these identified?

Records for permanent preservation must be stringently selected due to resource limits for storage and preservation.

Selecting these records is a joint responsibility and we rely on clients to advise us of enduring value in their records. The record creators are the experts and we recognise they know more about those records than anyone else.

Exact methods for selection differ according to different stakeholders and the relationships we have with them. As Inspecting Officers we frequently visit clients to look at records where this is necessary.

I won't list in detail the kind of information which is suitable for permanent preservation, but we are more than happy to discuss this.

How we can help with the PR(S)A?

Client managers we are not directly involved with the implementation process. Any queries should be directed to the Implementation Team. However, the Act

has certainly stimulated interest in records management among public bodies and given us an opportunity to develop our relationships with clients to improve record keeping and the selection process. It may mean more work, but we hope that the improvements in records management stimulated by the Act will give us the opportunity to work smarter with our clients.

As well as providing a general opportunity, The Act has had some direct implications for client management. In particular, there are two Elements of the Model Plan which clients may find it useful to speak about. Firstly, Element 7: 'Archiving and transfer arrangements', which specifically requires each authority's RMP to include provision for archiving of records to an appropriate repository. Secondly Element 5: 'Retention schedules'. Both elements are exactly the kind of thing which client managers are here to discuss. We would be glad to speak to authorities when they preparing retention schedules as we would like to identify records for preservation at the earliest possible stage in their life-cycle.

Further resources

Client managers can send further information as required and we are always happy to discuss issues. In summary, we anticipate the Act will help improve records management and we are here to help clients with this.

6. A Framework for Contractors - Latest

Dr Irene O'Brien, Chair of the Scottish Council on Archives (SCA), explained the contractors' framework document and the latest developments.

The SCA has developed guidance for contractors in the form of a minimum standard framework which is derived from the Archives and Records Management Services framework (ARMS). ARMS is a quality improvement framework helping to define relevant performance indicators for the sector. ARMS aims to support integration and co-operation between archives and records management services and will serve as a vital and practical tool for archive and records management professionals.

The contractors' minimum standard framework derived from ARMS seeks to assist contractors in respect of their relationship with public authorities when creating and managing public records under contract.

The framework draws on some of the indicators from ARMS to create a minimum standard, which most contractors should be able to comply with in relation to records management. There is a clear underpinning description to ensure the indicators are easy to understand. These quality indicators focus on: the creation and management of records; the protection of rights and interests (including compliance with existing regulations); and the requirement to ensure that records are kept as long as they are required.

Members from sub-group 2, which included representatives from the private and voluntary sectors, agreed that this framework meets all aspects of responsibility under the Act without placing unreasonable burdens on contracted bodies.

Dr O'Brien explained that several mapping exercises have also been undertaken: the framework was mapped by NRS against the model Records Management Plan (RMP) to ensure all areas of the RMP have been covered.

The ARMS toolkit has been developed as an on-line electronic toolkit in partnership with Quality Scotland and answers some of the questions posed by authorities, e.g. how to keep records and to list areas to improve on.

ARMS has a special section with guidance and guidelines for contractors with the ability to produce summary reports. This section is currently being tested, but there is a web address so delegates can browse the pages.

In terms of support and endorsement of ARMS, Dr O'Brien told delegates that the Keeper is happy to support ARMS. The Information Commissioner's Office is endorsing it.

Dr Kenny Meechan of Glasgow City Council has written a statement in conjunction with the Society of Local Authority Lawyers and Administrators in Scotland (SOLAR), who agreed the wording. This statement can be used as a template and be included in contractual agreements and/or procurement papers to reflect the new obligation to manage records created under certain public sector contracts. These clauses for contractors approved by SOLAR will provide a consistency of demand which will help to improve trust and support efficient service delivery.

Dr O'Brien stated that the guidance has been designed with small contractors in mind, so organisations would have a practical toolkit to support improvement.

7. What happens next?

Bruno outlined what happens next.

Firstly, the Keeper will publish a report on the consultation and produce a manifestation of responses received. It allows us to revisit some of the issues raised and develop solutions to be added to the Model Plan and Guidance.

A final version of the model plan and guidance will be published on NRS' website, taking consultation responses into account. The new NRS site is still under development but we would hope to have an embryonic site later this year.

The Forum was asked whether the model plan should be available in other formats, and arrangements were in place to make the current draft available should stakeholders require it.

NRS will engage with the Parliamentary process to advance the Commencement and Affirmative Orders – the latter amends the Schedule to accommodate changes to the public authority landscape and include bodies we know are currently missing; amalgamations or name changes .

There is a proposed plan for PR(S)A 'surgeries' to take place during September 2012 to engage with stakeholders and listen to views from practitioners about

the practicalities of making this work. Surgeries have been confirmed for Edinburgh, Dumfries, Glasgow, Perth and Inverness, and NRS will be issuing dates and a general invitation soon.

Because we want to have the opportunity to talk to people one-to-one, numbers will be limited to a 'first come first served basis'. These are informal events, but we hope that we can answer specific questions that may be asked. If found to be popular we would consider doing more post-implementation.

A consultation response request for workshops and interactive events, will be accomplished partly by the surgeries (although they won't be formal workshops).

We are also considering sector specific events once the Act goes live. These would take place a number of months before calling for the submission of RMPs. and act as the advance approach by the Keeper to an authority that they would be formally invited to submit a plan by a certain date. We would aim go out and talk to the targeted sectors regarding their particular needs.

Some of the suggestions from consultation responses included:

"I think a list of named contacts or 'mentors' (NAS contacts (+ possibly volunteers from a range of organisations?)) would be helpful for small organisations who may initially find the volume of information a bit daunting. The contacts/mentors group should liaise regularly to ensure consistency in replies & raise any frequently asked issues/concerns. Once 'launched', a list of FAQs on the NAS site would also be very useful."

We intend to develop a list of FAQs. That was done during the Bill process and was found to be very effective.

We remain neutral to an idea of contact mentors, however the Forum considered that this would be useful and if considered this feasible, NRS could put authorities in touch with each other where they recognised that common issues had arisen. Effectively act as a 'dating agency'.

When RMP's have been agreed, provided relevant permissions were obtained, NRS would replace the current samples in the Guidance Document. and fulfil the requirement to keep the guidance fresh and as relevant as possible. The Keeper has agreed that the NRS RMP will be published once it has been submitted to the implementation team and processed.

We will create an 'Executive Summary' document for records managers to present to their CEOs to help explain the requirements on the authority and ensure that the CEOs are aware of their duties. Sign off on a plan by a senior officer or named officer will provide the Keeper with very strong evidence.

Within the Guidance if only one sample exists should we use it at all, as we want to avoid the perception that this is somehow the only way to do something? Could stakeholders consider sending more samples for the elements that we are light on them? Updating guidance will be a huge task but we guarantee to do this on a regular basis, resources permitting. We would seek updates on links

from users, should these start to fail.

One response included a comment about summary checklist of requirements.

“We found the guidance clear and have been able to adapt the free-text format into a checklist of requirements that will help us in preparing a RMP (although this does rather suggest that organisations might find a summary checklist helpful)”.

Our reservation is that we don't want to turn the process into a tick box exercise.

Looking forward, we could consider an annual seminar programme – an open event, aimed at practitioners and others. Though NRS are happy to keep the Forum going, annual seminars are a logical progression and development. Sessions could include practitioner experience of working with the Act and raise issues that resulted. The Keeper will consider this further in 2013 and seek opinions from the records management community.

8. Open forum for questions and discussion

Colleagues participated in a full discussion and debated several issues that had been considered by the speakers, were relevant to the draft model plan and guidance, and other general records management issues of importance. These included,

The ambiguity that exists around the meaning of the word “transactions” under element 11 Audit Trail and the fact that many standard EDRM systems will create audit trails by recording access automatically. Some pointed out that IT systems and colleague can provide this information by interrogating drives. There was a recognition that there is overlap with the world of Information Security. The Keeper was keen to emphasise that his concern here is not so much with security of access, but with authorities knowing where their records are at all times for to support access and governance obligations.

Colleagues recorded the positive experience afforded them by participation in the Stakeholder Forum. It was the considered view of colleagues attending the meeting that professional collaboration had delivered a robust model plan and guidance and that consultation responses had been positive as a result. Working with colleagues across sectors and authorities had been a very positive exercise, particularly in respect of e-records.

It was noted that electronic record keeping is largely still aspirational in Scotland with lots of debate and experimentation ongoing. The E-Records Guidance will add to this debate and hopefully provide advice and guidance that will help authorities develop good e-records provisions. The advice will consider structured as well as unstructured information. The E-Records Guidance is not a finished product. It is a start. The product will evolve and will continue to mature going forward. Issues not yet fully developed, including metadata standards, will be added in due course and in collaboration with stakeholders.

It was agreed that the NRS should act as a hub where authorities struggling with aspects of the RMP might be put in touch with colleagues considered best able to help. This is preferable to the suggested 'mentors hub' of public authority records managers. The 'hub' has the potential to become burdensome and time consuming for authorities and records managers trying to keep on top of their own workload.

There was further agreement that a discussion forum of some sort would be beneficial to authorities and to the Act going forward. Colleagues liked the Communities of Practice facility and wondered if this might provide a solution. An e-forum will allow colleagues to learn from each other draw on experience and expertise.

Scottish Council on Archives colleagues are aware of the concerns of the small authorities and particularly voluntary sector bodies that might want to use ARMS to assess their provisions. SCA are happy to facilitate training sessions to help with this.

Voluntary sector colleagues welcomed this offer, but advised that voluntary organisations will regard themselves as have more pressing issues than the PR(S)A and it may be difficult to get smaller organisations to engage with the PR(S)A. A publicity campaign that included contractors will be essential. Several options for collaboration on effective engagement were proposed, including Quality Scotland, SCVO, OSCR and others. NRS will include the important issue of contractor involvement as part of the ongoing publicity drive preparations.

NRS: confirmed that January 2013 is the date of full implementation of the Act, but advised that authorities will be given advance notification of intent by the Keeper to call in RMPs. This is designed to allow for discussion around any issues that the authority has around compliance. The Keeper will be emphasising the importance of self-assessed continuous improvement as the vehicle for public authority compliance in these discussions.

9. Closing remarks

The Keeper closed the meeting with some concluding remarks.

The response to the consultation was very positive, which indicated a good deal of interest in the PR(S)A. NRS will look at these responses and take them into account.

Pete made a good point - We don't expect perfection, and to let us know if you have any issues in submitting your plans.

John talked about e-records and will get back to stakeholders on progress – there is a possibility of making the site interactive, but at the moment you can email E-Records with comments and questions. One of John's suggestions was that E-Records may add your queries to the site and another authority may be able to assist you.

The query about the term “transactions” brings the terminology used into the spotlight – it was agreed that simple terms should be used and jargon avoided.

The Keeper confirmed that he was very keen on ARMS: it is an example of good practise, and he is interested in having authorities’ views on this. It seems practical and that’s exactly what we want.

Under next steps, the Keeper agreed that NRS needs a timetable that goes beyond January 2013. He had the impression that there was a demand for networking opportunities, and that local networking and informal mentoring would be particularly good. NRS would also like to look at face to face meetings, and would like stakeholders’ opinions on all these options.

The Keeper thanked Dr O’Brien for her offer of training from the SCA and Mark Ballard from Barnardo’s for pointing out issues that voluntary organisations may have, and for directing NRS towards more effective communication with them.

The Keeper reinforced the assistance that NRS will offer and that he is not trying to persecute or embarrass Scottish public authority records managers – quite the opposite. He is keen to encourage and spread improvement and good practice, as one of the consultation responses acknowledged:

“We welcome the Keeper’s positive emphasis on working with public bodies to improve record keeping rather than putting the emphasis on trying to catch public bodies out for minor failings.”

The Keeper also reinforced the ‘Improvement Model’ idea: that a RMP that recognises gaps and has plans to close them up is a sign of positive records management. He realises that not all organisations will currently be meeting all the elements’ requirements: that takes time to achieve; but he is sure we will make progress. To emphasise the point of self-improvement, he added a quote from a consultation response:

“Hopefully it will be recognised that not every organisation will be in the position of being able to satisfactorily meet all the elements in the records management plan. In some cases it will take years of planning and development to reach the desired outcome. An example of this would be the requirement to have an agreed Business Classification Scheme in place. For a large organisation this would be an enormous undertaking. However, the plan provides enough guidance for authorities to make improvements in the right direction. The Model Records Management Plan does provide a blue print for public authorities to make vast improvements in the management of their records but it must be recognised that it will take time and effort to achieve.”

Introducing the idea that gatherings such as this afternoon’s are an excellent opportunity for networking and discussing public authority records management, the Keeper said that perhaps this could be a regular event outside the requirements of the Act.

He thought that practitioners and others could possibly come to a yearly event with their issues - good and bad – surrounding implementation of the Act. The

idea of meeting on an annual basis has been very valuable for registrars, so this model could be modified and NRS will consider this further.

In conclusion, the Keeper felt that we have come a long way since the passage of the Act, there is a lot more to do, but by working together to we can certainly achieve it.