

## **Public Records (Scotland) Act 2011**

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

**The Keeper of the Records of Scotland**

**5<sup>th</sup> July 2023**

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## 1. Public Records (Scotland) Act 2011

The Public Records (Scotland) Act 2011 (the Act) received Royal assent on 20 April 2011. It is the first new public records legislation in Scotland since 1937 and came fully into force on 1 January 2013. Its primary aim is to promote efficient and accountable record keeping by named Scottish public authorities.

The Act has its origins in *The Historical Abuse Systemic Review: Residential Schools and Children's Homes in Scotland 1950-1995* (The Shaw Report) published in 2007. The Shaw Report recorded how its investigations were hampered by poor record keeping and found that thousands of records had been created, but were then lost due to an inadequate legislative framework and poor records management. Crucially, it demonstrated how former residents of children's homes were denied access to information about their formative years. The Shaw Report demonstrated that management of records in all formats (paper and electronic) is not just a bureaucratic process, but central to good governance and should not be ignored. A follow-up review of public records legislation by the Keeper of the Records of Scotland (the Keeper) found further evidence of poor records management across the public sector. This resulted in the passage of the Act by the Scottish Parliament in March 2011.

The Act requires a named authority to prepare and implement a records management plan (RMP) which must set out proper arrangements for the management of its records. A plan must clearly describe the way the authority cares for the records that it creates, in any format, whilst carrying out its business activities. The RMP must be agreed with the Keeper and regularly reviewed.

## 2. Executive Summary

This report sets out the findings of the Keeper's assessment of the RMP of 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 2<sup>nd</sup> July 2021.

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 15 elements of the Keeper's statutory Model Records Management Plan (the Model Plan) under section 8(3) of the Act, and whether in this respect it complies with it and 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

### Scottish Parliament

The Scottish Parliament examines the activities of the Scottish Government, makes new laws on devolved matters and debates the issues of the day.

[www.parliament.scot](http://www.parliament.scot)

### Scottish Parliamentary Corporate Body

The Scottish Parliamentary Corporate Body (SPCB) is a body of the Scottish Parliament responsible for the administration of the parliament. It also has a role in provision of services to commissioners and other statutory appointments made by the parliament. The SPCB is established by section 21 of, and schedule 2 to, the Scotland Act 1998.

[Scottish Parliamentary Corporate Body | Scottish Parliament Website](#)

### Scottish Commission for Public Audit

The Scottish Commission for Public Audit (SCPA) is made up of 5 Members of the Scottish Parliament. The SCPA is not a parliament committee. The Commission is responsible for looking at Audit Scotland's proposals for the use of resources and spend, then reporting on them to the Parliament. It is also responsible for appointing a qualified person to audit the accounts of Audit Scotland.

[Scottish Commission for Public Audit | Scottish Parliament Website](#)

## 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:

<b>G</b>	The Keeper agrees this element of an authority’s plan.		<b>A</b>	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.		<b>R</b>	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

Element	Present	Evidence	Notes
1. Senior Officer	<b>G</b>	<b>G</b>	<p>The Public Records (Scotland) Act 2011 (the Act) requires that an individual senior staff member is identified as holding corporate responsibility for records management in a public authority.</p> <p>The Scottish Parliament, Scottish Parliamentary Corporate Body and the Scottish Commission for Public Audit (the Scottish Parliament) have identified Alan Balharrie, Chief Information Officer and Group Head for Digital Services, as the individual with overall responsibility for records management in the organisation.</p> <p>The identification of the Chief Information Officer and Group Head for Digital Services to this role is supported by a <i>Statement of Responsibility</i> from Mr Balharrie (see under General Comments below), by the <i>Records Management Policy</i>, for example page 6, and by the <i>Documents and Communications Retention Policy</i> (page 4).</p> <p>Mr Balharrie, wrote the Foreword of the <i>Records Management Policy</i> (see element 3)</p> <p>The Keeper agrees that the Scottish Parliament has identified an appropriate individual to this role as required by the Act.</p>
2. Records Manager	<b>G</b>	<b>G</b>	<p>The Act requires that each authority identifies an individual staff member as holding operational responsibility for records management and that this staff member has</p>

			<p>appropriate corporate responsibility, access to resources and skills.</p> <p>The Scottish Parliament recognises this. Their overarching <i>Records Management Strategy</i> - see element 3 - commits the authority as follows: "We will have in place organisational arrangements that support records management <u>including an appropriately qualified records manager</u>" (<i>Strategy</i> page 2).</p> <p>The Scottish Parliament have identified Gordon Hobbs Information Manager, as the individual with day-to-day responsibility for implementing the <i>RMP</i>.</p> <p>The identification of the Information Manager to this role is supported by the <i>Records Management Policy</i> (see element 3), for example page 5/6 which explains: "The Information Manager is responsible for:          Providing good practice through policies, procedures and guidance which meet our needs;          Ensuring all teams and individuals understand and can carry out their responsibilities;          Ensuring the document and records management system and hardcopy records storage service are both fit-for-purpose          Ensuring records are created, retained and disposed of in accordance with the Scottish Parliament Corporate Body records retention schedule." (to avoid confusion, for the rest of this assessment 'SPCB' will be identified as 'Scottish Parliament' as all statements apply to the three scheduled authorities)</p> <p>The identification of the Information Manager to this role is also supported by a <i>Statement of Responsibility</i> written by Mr Hobbs and provided to the Keeper.</p> <p>Mr Hobbs reports records management issues directly to the Chief Information Officer, Alan Balharrie (see element 1). This is confirmed in a <i>Statement of Responsibility</i> by Mr Balharrie in which he states "Through the reporting structure, the Information Manager can highlight issues and discuss strategies for the</p>
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			<p>improvement of recordkeeping across the Scottish Parliamentary Service, with me directly".</p> <p>The Information Manager's office is part of the Parliament's Digital Services Group, which also includes Business Information Technology. As the majority of the public records of the Parliament are 'born-digital', this is a useful connection.</p> <p>Similarly, the Keeper notes Mr Hobb's personal involvement in the development and implementation of the M365 records-management structure and with the additional functionality of the third-party bolt-on solution explained in element 4 below.</p> <p>Any requirement to delay disposal of public records, beyond that agreed retention period (see element 5), must be authorised by the Information Manager.</p> <p>The Information Manager is responsible for liaison with NRS concerning the transfer of public records to archive (see element 7).</p> <p>It is clear from the above that the identified individual has a detailed knowledge of the records management provision in the authority.</p> <p>The Keeper agrees that the Scottish Parliament have identified an appropriate individual to this role as required by the Act.</p>
3. Policy	<b>G</b>	<b>G</b>	<p>The Act requires an authority to have an appropriate policy statement on records management.</p> <p>The Scottish Parliament has a <i>Records Management Strategy</i> a copy of which has been provided to the Keeper. It is available to the public on the Scottish Parliament Website at <a href="https://www.parliament.scot/Records-Management-Strategy">Records Management Strategy (parliament.scot)</a></p>

			<p>The overarching strategy is supported by a <i>Records Management Policy</i>. The Keeper has been provided with a copy of this <i>Policy</i> dated 2021. It is also available to the public on the Scottish Parliament Website at: <a href="#">Records management policy   Scottish Parliament Website</a></p> <p>The Keeper has been provided with a <i>Statement of Responsibility</i> from the Chief Information Officer (see element 1) in which he specifically endorses both the <i>Records Management Policy</i> and <i>Strategy</i> (as noted above, he wrote the Foreword to the <i>Policy</i>).</p> <p>The <i>Records Management Policy</i> is supported by the <i>RMP</i> and by detailed staff guidance in the form of a <i>Records Management Procedures</i> document which is available through the Scottish Parliament’s intranet (SP Online). The Keeper has been provided with a copy of the <i>Records Management Procedures</i> guidance (version 3.0 February 2023) and with screen-shots of SP Online showing staff are able to access records management <i>Policy</i> and <i>Procedures</i> documents including staff guidance.</p> <p>The <i>Records Management Procedures</i> document specifically mentions the Public Records (Scotland) Act 2011 and the Data Protection Act 2018 (see element 9).</p> <p>The Keeper acknowledges that the documents mentioned above specifically state they apply to all three scheduled authorities.</p> <p>The Keeper agrees that The Scottish Parliament has a formal records management policy statement as required by the Act.</p>
4. Business Classification	<b>G</b>	<b>G</b>	The Keeper of the Records of Scotland (the Keeper) expects that the public records of an authority are known and are identified within a structure.

			<p>The Scottish Parliament recognises this. Their overarching <i>Records Management Strategy</i> - see element 3 - commits the authority as follows: "We will keep records in systems that enable records to be stored and retrieved as necessary and in accordance with recognised standards and good practice" (<i>Strategy</i> page 2). The management of records in the Scottish Parliament's document and records management system is also supported by clauses in the <i>Records Management Policy</i> (also element 3) such as those on <i>Policy</i> page 4.</p> <p>Alongside the reviewed <i>RMP</i>, the Keeper has been provided with the Scottish Parliament's <i>Records Management Maturity Model</i> which requires that "Records systems should be designed to meet the [Scottish Parliament]'s operational needs and using them should be an integral part of business operations and processes. They should be easy to understand and use, enable easy retrieval of information and set up in a way that enables routine RM processes to take place. Records systems should enable the context of each record and its relationship to other records to be understood (e.g. through classification in a file plan and/or through the application of appropriate metadata) and for groups of like records to be managed together. Record systems should produce an audit trail recording all actions performed on its contents."</p> <p>With this objective in mind, the Keeper has been provided with a copy of the Scottish Parliament <i>Business Classification Scheme (BCS)</i> and notes that it is structured by a class-item hierarchy that represents business functions, activities and transactions. For example Corporate governance/ Environmental management/Aspects register/Environmental Aspects Register. The Keeper has also been provided with a screen-shot showing staff access to the <i>Scheme</i>. The <i>BCS</i> reflects the functions and activities undertaken by the authority and is updated regularly by information management staff to reflect any changes. The Keeper commends the recognition that a business classification scheme (and a retention schedule – see element 5) is a 'living document' subject to alteration appropriate to</p>
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			<p>developments in an authority's business requirements.</p> <p>An explanation of the principles of a business classification scheme is supplied to all staff through the <i>Records Management Procedures</i> guidance document (see element 3) available on the Parliament's intranet (for example at <i>Procedures</i> page 18).</p> <p>The public records of the Scottish Parliament are managed in a hybrid system. They manage records digitally on the principal records keeping system (SharePoint); in line-of-business systems (limited), in physical format in-house and physically in a third-party records store.</p> <p><u>Digital</u>          Since 2021 the digital records of the Scottish Parliament have been managed on Microsoft's SharePoint Online structure augmented by a third-party records management bolt-on which allows enhanced control and additional functionality. The existing <i>Business Classification Scheme (BCS)</i> has now been synchronised within the new M365 environment. As the <i>BCS</i> has been fully embedded in the system. It should be impossible for a digital record to sit outside the <i>BCS</i>. With the nature of a <i>BCS</i> being a 'living document', as noted above, the Scottish Parliament notes in its <i>RMP</i> (page 11) that "When new SP Online sites are created for a new project, contract etc. a new <i>BCS</i> term is created and associated with the site ... to ensure records are captured." The Keeper has seen a sample of this functionality.</p> <p>All the above represents a significant change, and improvement, since the previous <i>RMP</i> was agreed by the Keeper, under improvement model terms, in 2014.</p> <p>The Information Manager (see element 2) is identified in the M365 platform as the 'Product Owner', he led the development and implementation of the M365 records management solutions. He also has been assigned 'Global Reader' access to the</p>
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			<p>M365 control centre, and a similar role in the third party add-on mentioned above. This gives the Information Manager full access to the reports which assist in understanding how users are managing public records. The Keeper has been supplied with a screen-shot showing how the Information Manager accesses reports in the control centre.</p> <p>In the Keeper’s original agreement he agreed this element on an amber ‘improvement model’ basis. This meant that the authority had identified a gap in provision (lack of a fully rolled out structure for the management of digital records) and evidenced a commitment to closing the gap. This agreement was conditional on the basis that the Keeper was kept informed of progress. The Keeper acknowledges that he has received regular updates, as requested, on the development of the M365 project and of other improvements in the records management structure being operated by the authority. These updates have been provided through the Progress Update Review (PUR) process (in 2018 and 2020) and through continuous engagement with the Keeper’s PRSA Assessment Team. The use of the PUR reporting mechanism is to be commended. The latest report of the PUR for the Scottish Parliament can be found here: <a href="https://nrs.scot.nhs.uk/nrs-scotland.gov.uk">NRS - Progress Update Review (PUR) Final Report by the PRSA Assessment Team for the Scottish Parliament, October 2020 (nrsotland.gov.uk)</a> The Keeper can now fully agree this element as the Scottish Parliament have adopted a SharePoint structure (supplemented by a records management bolt-on) as described above.</p> <p><u>Line-of-Business Systems</u> A very small part of the administration of the Scottish Parliament takes place in line of business systems outwith SharePoint. An example would be their use of the financial system SEAS. The Keeper can agree that such a system is likely to allow the appropriate management of records within a structure as required.</p> <p><u>Physical records – In House</u></p>
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			<p>Although the majority of the public records managed by the Scottish Parliament are digital, there are some hard-copy records that require management in-house. These are stored in secure cabinets in the Holyrood complex when in use or in an on-site records store. The Keeper has been provided with details of the systems in place to ensure that the Scottish Parliament can be confident that these records can be stored, retrieved and destroyed/archived when appropriate. The Keeper agrees that the staff guidance document <i>Records Management Procedures</i> (see element 3) which is available to all staff through the Parliament's intranet 'SP Online', supports the management of paper records as appropriate, for example at <i>Procedures</i> page 6.</p> <p><u>Physical records – External</u>          The Scottish Parliament also employ the services of a long-term storage contractor for the management of some of its hard-copy records. Records sent to external storage are logged by the Information Governance Team on box content sheets. The Keeper has been provided with details of the third party and of the systems set up with this supplier to ensure that the Parliament can be confident that the public records they hold are being robustly managed. Staff Guidance on the transfer of paper records to the contractor (and the recall of records when necessary) is a feature of the <i>Records Management Procedures</i> guidance document (see element 3) for example 'How to pack boxes' at <i>Procedures</i> page 19.</p> <p><u>E-mail</u>          The Keeper acknowledges that the Scottish Parliament recognises the requirement to manage e-mail and have appropriately instructed staff how to save relevant business e-mails to SharePoint and purge those of transient value from their systems (For example <i>Records Management Procedures</i> – see element 3 – pages 8 and 16 or <i>Retention Policy</i> – see element 5 – page 6)</p> <p>Not all the records of the Scottish parliament are managed digitally on the main</p>
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			<p>SharePoint system or in controlled paper format for example records created in apps such as WhatsApp. See element 5 for more on these ‘uncaptured’ records.</p> <p>The Keeper agrees that The Scottish Parliament retains all its public records in controlled systems which are structured in a clear manner and which can be used by staff to manage public records where appropriate.</p>
<p>5. Retention schedule</p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>The Keeper expects an authority to have allocated retention periods to its public records and for those records to be retained and disposed of in accordance with a Retention Schedule.</p> <p>The Parliament's <i>Records Management Policy</i> (see element 3) explains that "Good records management...ensures we have...a consistent approach to its creation, use, <b>retention</b> and disposal" (<i>Policy</i> page 3).</p> <p>The <i>Maturity Model</i> (see element 13) includes a target that "Records should not be kept after they have ceased to be of use to the [Scottish Parliament] unless they are known to be the subject of litigation or a request for information; or they have long-term value for historical or other research purposes".</p> <p>An explanation of the principles of retention is supplied to all staff through the <i>Records Management Procedures</i> guidance document (see element 3) available on the Parliament's intranet (for example at <i>Procedures</i> page 12).</p> <p>The Information Manager (see element 2) is responsible for "ensuring records are created, retained and disposed of in accordance with the [Scottish Parliament] records retention schedule" (<i>Records Management Procedures</i> – see element 3 – page 30).</p> <p>The Scottish parliament has a full <i>Retention Schedule</i> which has been provided to</p>

			<p>the Keeper. The <i>Retention Schedule</i> is format neutral and includes records that are managed in paper format.</p> <p>The <i>Retention Schedule</i> maps against the record types noted in the <i>BCS</i> (see element 4) and provides staff with information regarding how long each record type is retained, what the retention trigger is, what the disposition decision is (destroy or archive) and any legislation that influences the decision. For example, to use the example in element 4 above, the <i>Environmental Aspects Register</i> is retained for 5 years from the last action (elimination or updating of risk) then it is destroyed as permitted under the Environmental Impact Assessment (Scotland) Regulations 1999.</p> <p>The third-party bolt-on (see element 4) provides extra functionality to the SharePoint system that allows appropriate control of record lifecycles and to apply retention and disposal rules as it allows "the automation of rules in addition to manual approvals" and "The Records Manager can view reports on the 'Records Management Dashboard', including managed records, destroyed records, records that have outstanding approval actions, etc" (<i>RMP</i> page 5).</p> <p>The Information Manager (see element 2) is identified in the M365 platform as the 'Product Owner', he led the development and implementation of the M365 records management solutions. He also has been assigned 'Global Reader' access to the M365 control centre, and a similar role in the third party add-on. This gives him full access to reports which assist in understanding how users are managing public records. The Keeper has been supplied with a screen-shot showing how the Information Manager accesses reports in the control centre.</p> <p>The Parliament note that "All records environments are visible in one interface making it possible to associate <i>BCS</i> terms with rules for retention or disposal, apply term settings, and assign content to business functions regardless of location". The</p>
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			<p>Keeper commends the principle of combining business classification and retention schedules into a single document as it is liable to provide a stronger business tool for staff.</p> <p>Not all the records of the Scottish parliament are managed digitally on the main SharePoint system or in controlled paper format (for example apps such as WhatsApp, OneDrive or Teams chats). In these cases retention cannot be automatically prompted by the <i>Retention Schedule</i> (although the Keeper notes there is a future development on <i>RMP</i> page 14 to investigate this). The retention of records managed outside of the main record-keeping systems is supported by a separate <i>Retention Policy</i> which has been supplied to the Keeper. The Keeper commends the recognition of the risks inherent in records created outwith the central systems. Staff are encouraged to maintain appropriate records of their activities and ensure that these records are accessible and managed in SharePoint in accordance with records management procedures and the records retention schedule. However in the case of 'ephemeral documents and communications' sensible retention is applied separately and the Keeper agrees that appropriate instructions are provided to staff through the <i>Retention Policy</i> to mitigate these risks. The Keeper also notes that guidance on the use of these systems is a feature of the staff <i>Records Management Procedures</i> guidance document (see element 3). For example guidance appears on <i>Procedures</i> page 13 and 14.</p> <p>The Keeper agrees that the Scottish Parliament has a schedule providing retention decisions for the record types created while pursuing its functions.</p>
6. Destruction Arrangements	<b>G</b>	<b>G</b>	<p>The Act requires that public records are destroyed in a timely, controlled and secure manner.</p> <p>The Scottish Parliament recognises this. Their overarching <i>Records Management Strategy</i> - see element 3 - commits the authority as follows: "We will define how long</p>

			<p>we need 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" (<i>Strategy</i> page 3).</p> <p>The Parliament's <i>Records Management Policy</i> (also element 3) explains that "Good records management...ensures we have...a consistent approach to its creation, use, retention and <b>disposal</b> (<i>Policy</i> page 3).</p> <p>With these objectives in mind the Scottish Parliament have the following procedures in place.</p> <p><u>Digital</u>          Digital records are disposed of according to the retention decisions applied to the record type (see element 5) by the information management team after consultation with the relevant business area. An audit trail is retained in SharePoint and the deleted record is replaced by a disposition stub which retains the original record's metadata. The use of destruction logs is explained to staff. The Keeper commends this practice. Destruction reports are provided to the Information Manager through the third-party bolt-on to SharePoint implemented by the Parliament (see element 4). This bolt-on also allows the permanent retention of destruction logs.</p> <p><u>Line-of-Business systems</u>          A limited amount of the administration of the Scottish Parliament is conducted in line-of-business systems that sit outside SharePoint, but the Keeper can agree that they are likely to allow the destruction of public records within a retention framework as required.</p> <p><u>Physical in-house:</u>          Paper records managed onsite are destroyed following consultation with the Information Governance Team and logged on a form provided by them. All</p>
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			<p>hardcopy records on-site are destroyed using an on-site confidential waste service. The Keeper has been provided with a copy of the template form and with a sample destruction certificate to show this arrangement is operational. <b>The Keeper notes a ‘future development’ to investigate the possibility of recording the destruction of paper records on the same system as that is used for digital records, rather than separately. This seems a sensible improvement and the Keeper would be pleased to learn if this is, in fact, implemented.</b></p> <p><u>Physical third party storage:</u> For paper records held in offsite storage, destruction is carried out by the offsite storage contractor who provide a destruction certificate. The Keeper has been provided with a sample destruction certificate to show this arrangement is operational.</p> <p><u>Hardware:</u> Public records created on hardware, such as computers, laptops or other mobile devices are securely deleted when appropriate. The Keeper has been provided with an extract for a contract for the recycling and disposal of IT equipment between the Parliament and a third-party to show how the destruction of hardware is arranged.</p> <p><u>Back-Ups:</u> The Scottish Parliament, quite properly, back-up data for business continuity purposes. However, it is important that they understand how long, after removal from the operational system a public record may be available through the back-up system. The majority of the Scottish Parliament’s public records are covered by the back-up feature of the principle records management system, SharePoint online with a third-party bolt-on. The <i>RMP</i> explains the back-up process and the Keeper can agree that the destruction of digital back-up copies is controlled and understood.</p>
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			<p>Furthermore, the Keeper acknowledges that the Scottish Parliament addresses the disposition of documents held outwith the main record-keeping systems (for example WhatsApp, OneDrive, Teams chats – described as “ephemeral documents and communications”) through a <i>Retention Policy</i> (see element 5) which has been supplied to the Keeper. The purpose of this policy is “reduce the risk of non-compliance or breaches in security by permanently deleting information we’re no longer required to retain in a secure and auditable manner.”</p> <p>The Keeper agrees that the staff guidance document <i>Records Management Procedures</i> (see element 3) which is available to all staff through the Parliament's intranet 'SP Online', supports the controlled destruction of public records when appropriate, for example at <i>Procedures</i> page 6.</p> <p>The Keeper agrees that the Scottish Parliament has processes in place to irretrievably destroy their records when appropriate.</p>
7. Archiving and Transfer	<b>G</b>	<b>G</b>	<p>The Act requires that all Scottish public authorities identify a suitable repository for the permanent preservation of any records considered suitable for archiving. A formal arrangement for transfer to that repository must be in place.</p> <p>The Scottish Parliament clearly understand this requirement. The Chief Information Officer, Alan Balharrie (see element 1), has provided the Keeper with a <i>Statement of Responsibility</i> in which he specifically acknowledges the role controlled records management has in ensuring the Parliament is able to maintain a sufficient archive of its activities for future generations.</p> <p>The <i>Records Management Policy</i> (see element 3) also specifically supports the permanent retention of a selection of the authority’s public records (for example <i>Policy Foreword</i>) The <i>Policy</i> also explains that "Good records management ...ensures we have...a consistent approach to its creation, use, retention and</p>

			<p>disposal throughout the organisation, reducing reputational risk and <u>ensuring records of historical significance are maintained</u> (<i>Policy</i> page 3).</p> <p>Furthermore, the <i>RMP</i> states: “The Scottish Parliamentary Service (SPS) recognises that records management is vital for the proper functioning of any organisation and is essential in ensuring that the Parliament has accurate, reliable and accessible records of its work to support its business and <u>maintain a sufficient archive of its activities</u> (<i>RMP</i> Introduction).</p> <p>The staff guidance <i>Records Management Procedures</i> document (see element 3) explains that 'We keep records to...provide a long-term corporate and national memory' and provides further staff guidance in an 'Archiving records with National Records of Scotland (NRS)' section (<i>Procedures</i> page 24).</p> <p>The Scottish Parliament has selected the National Records of Scotland (NRS) as their archive.</p> <p>NRS is an accredited archive <a href="#">NRS' Archive Service Accreditation Success   National Records of Scotland (nrscotland.gov.uk)</a> and fully adheres to the Keeper's Supplementary Guidance on Proper Arrangements for Archiving Public Records: <a href="https://www.nrscotland.gov.uk/files//record-keeping/public-records-act/supplementary-guidance-on-proper-arrangements-for-archiving-public-records.pdf">https://www.nrscotland.gov.uk/files//record-keeping/public-records-act/supplementary-guidance-on-proper-arrangements-for-archiving-public-records.pdf</a></p> <p>This arrangement is formalised through a <i>Memorandum of Understanding (MoU)</i> between NRS and the Scottish Parliament. The Keeper has been provided with a copy of this <i>MoU</i>. The <i>RMP</i> (page 18) explains that the <i>MoU</i> was created subsequent to the NRS been given the opportunity to review the Parliament's records retention schedule (see element 5) and after the records selected for permanent preservation have been jointly agreed. The Keeper notes that the <i>MoU</i></p>
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			<p>was under review at time of submission. This does not affect his agreement of this element.</p> <p>The Scottish Parliament explains (<i>RMP</i> page 18) that the functionality of the records management bolt should allow efficient transfer of digital records from SharePoint to NRS. The first such transfer is expected later in 2023.</p> <p>The Keeper agrees that the staff guidance document <i>Records Management Procedures</i> (see element 3) which is available to all staff through the Parliament's intranet 'SP Online', supports the archiving of public records when appropriate, for example at page 6. This guidance also includes a useful disposition flowchart (<i>Procedures</i> page 29).</p> <p>The Keeper agrees that the Scottish Parliament has arrangements in place to properly archive records when appropriate.</p>
8. Information Security	<b>G</b>	<b>G</b>	<p>The Act requires that public records are held in accordance with information security compliance requirements.</p> <p>The Scottish Parliament recognises this. Their overarching <i>Records Management Strategy</i> - see element 3 - commits the authority as follows: "We will ensure that records are stored securely and that access to them is controlled according to the requirements of the protective marking system and other relevant requirements" (<i>Strategy</i> page 2).</p> <p>The Chief Information Officer, Alan Balharrie (see element 1), has provided the Keeper with a <i>Statement of Responsibility</i> in which he specifically acknowledges the role controlled records management has in improving the security of records. The <i>Records Management Policy</i> (see element 3) also specifically supports the security of public records (for example <i>Policy</i> Foreword).</p>

			<p>The Scottish Parliament have an <i>Information Security Policy</i> which has been provided to the Keeper. This is dated 2017. <b>The Keeper notes that the policy is currently under review and requests that an updated version is supplied as soon as is practicable.</b></p> <p>The Keeper has been provided with screen-shots showing that staff can access relevant information governance policies and procedures including the <i>Information Security Policy</i>.</p> <p>The <i>Information Security Policy</i> includes instructions for reporting security breaches (actual or potential). The Keeper has been provided with a sample <i>Security Incident Reporting Form</i>.</p> <p>In the <i>Information Security Policy</i> the Scottish Parliament commits to ensure that “Sufficient guidance is provided to system users regarding their responsibilities using information resources and also ensuring Information Security” and that “All applicable Information Security policies and procedures are published, applied and practiced” (see element 12).</p> <p>As an example of these supporting procedures, which have been shared with the Keeper, the Scottish Parliament imposes a protective marking system on public records. they describe this as “the method by which the originator of information indicates to others the levels of protection required when handling the information in question, in terms of its sensitivity, security, storage, movement both within and outside the Parliament and its ultimate method of disposal.” This is explained to staff in the <i>Scottish Parliamentary Service's Protective Marking System</i> document which has been provided to the Keeper (v1.0 2021) and is also published <a href="https://www.parliament.scot/protective-marking-system">Protective Marketing System (parliament.scot)</a></p>
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			<p>The Scottish Parliament's <i>Records Management Maturity Model</i> (see element 13) includes the following objective: "Record systems should provide secure storage to the level of protection required by the nature, contents and value of the information in them and should protect records in digital systems from accidental or unauthorised alteration, copying, movement or deletion."</p> <p>The SharePoint (M365) system, on which the majority of the public records of the Parliament are created and managed, allows for the secure, audited storage of electronic documents automatically imposing restrictions to prevent unauthorised access, destruction, alteration, or removal of records.</p> <p>The Keeper agrees that the Parliament recognise the risks inherent in the creation of records on mobile devices and other remote working situations (for example <i>RMP</i> page 20).</p> <p>The Keeper agrees that the Scottish Parliament have procedures in place to appropriately ensure the security of their records as required by the Act.</p>
<p>9. Data Protection</p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>The Keeper expects a Scottish public authority to manage records involving personal data in compliance with data protection law.</p> <p>The Scottish Parliament is registered as a data controller with the Information Commissioner's Office (ICO): <a href="https://ico.org.uk/for-the-public/organisations/register-of-data-protection-fee-payers">Information Commissioner's Office - Register of data protection fee payers - Entry details (ico.org.uk)</a></p> <p>The Scottish Parliament have a <i>Data Protection Policy</i>. The Keeper has been provided with a copy of this <i>Policy</i>. This is version 1.1 dated April 2020. This is published at: <a href="#">Data protection policy   Scottish Parliament Website</a></p>



			<p>The <i>Data Protection Policy</i> confirms that “The [Scottish Parliament] understand that privacy by design and the lawful and correct treatment of personal information is central to its successful operations and to maintaining confidence between the [Scottish Parliament] and those with whom we interact. We ensure that our organisation processes all personal data in a way that is lawful and correct and we fully endorse and adhere to the data protection Principles set out in the GDPR.”</p> <p>The <i>Data Protection Policy</i> explains the 6 principles of data protection and the GDPR accountability clause.</p> <p>Service users can make a subject access request using an online template letter: <a href="#">Request personal information about you that we hold   Scottish Parliament Website</a></p> <p>The Scottish Parliament have appointed a Data Protection Officer as required by the Data Protection Act 2018. This is Robin Davidson.</p> <p>The Scottish Parliament have other relevant data protection information published on their website for example <a href="#">Privacy statement - Scottish Parliament   Scottish Parliament Website</a></p> <p>The Scottish Parliament have committed to carrying out data protection impact assessments before they begin any processing of personal data which is likely to result in a high risk to individuals. With this in mind they have a <i>Data Protection Impact Assessment (DPIA) Policy</i> which has been provided to the Keeper. This is version 2.0 dated 3rd June 2021.</p> <p>Furthermore, they have supporting guidance for staff, such as an e-learning module. This has also been shared with the Keeper (see element 12).</p> <p>The Keeper agrees that the <i>Records Management Procedures</i> guidance document</p>
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			<p>(see element 3) supports the principles of Data protection. All staff have access to this guidance on the Parliament's intranet.</p> <p>The Scottish Parliament operates information sharing in accordance with the Information Commissioner's Data sharing code of practice – see element 14. (<i>RMP</i> page 32)</p> <p>The Keeper agrees that the Scottish Parliament have arrangements in place that allow them to properly comply with data protection legislation.</p>
<p>10. Business Continuity and Vital Records</p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>The Keeper expects that record recovery, prioritising vital records, is an integral part of the authority's business continuity planning.</p> <p>In their <i>Information Security Policy</i> (see element 8) the Scottish Parliament commits to ensuring "Appropriate contingency or disaster recovery plans to provide continuity of operation for all critical IT systems and supporting functions are developed in line with the organisations business continuity plans."</p> <p>With this in mind, the Scottish Parliament has an overarching <i>Business Continuity Resilience Strategy</i> which has been provided to the Keeper. The strategy is supported by a <i>Business Continuity Manual</i> which has also been provided (2018 version). The Keeper agrees that the <i>Business Continuity Manual</i> addresses records recovery (for example pages 7 onwards). The <i>RMP</i> explains that, following the overall objectives of the <i>Strategy</i> and the detailed instructions in the <i>Manual</i>, each business area of the Parliament is required to develop a local <i>Business Continuity Plan</i>.</p> <p>Business Continuity Plans, naturally, may contain sensitive information (home telephone numbers etc.). The Keeper has stipulated that if a public authority is concerned about sharing these outside their organisation, for example by submitting</p>

			<p>them in evidence of PRSA compliance, she will accept a confirmatory statement from a senior officer in the authority. The Keeper acknowledges that she has received such a statement from Alan Balharrie, Chief Information Officer and Group Head for Digital Services. Mr Balharrie confirms that local business continuity plans are embedded throughout the Parliament and that “appropriate processes are in place to recover records managed in our systems should there be a requirement”</p> <p>The Keeper agrees that the new, cloud-based records management system (see element 4), improves the record recovery aspect of the Parliament’s business continuity.</p> <p>The Keeper agrees that the Scottish Parliament has an approved and operational business continuity process and that information management and records recovery properly feature in the authority’s plans.</p>
11. Audit trail	<b>G</b>	<b>G</b>	<p>The Keeper expects an authority to have processes in place to track public records in such a way that their location is known and changes recorded.</p> <p>The Scottish Parliament recognises this. Their overarching <i>Records Management Strategy</i> - see element 3 - commits the authority as follows: "We will know what records we hold and where they are and ensure that they remain usable for as long as they are required" (<i>Strategy</i> page 2).</p> <p>The Chief Information Officer, Alan Balharrie (see element 1), has provided the Keeper with a <i>Statement of Responsibility</i> in which he specifically acknowledges the role controlled records management has in improving the accessibility of records.</p> <p>The <i>Records Management Policy</i> (see element 3) also specifically supports efficient access to the authority’s public records For example by committing the Parliament to ensure that records "can be retrieved quickly to aid decision-making and increase</p>

			<p>management effectiveness" (Policy page 4).</p> <p>The <i>RMP</i> states: "The Scottish Parliamentary Service (SPS) recognises that records management is vital for the proper functioning of any organisation and is essential in ensuring that the Parliament has accurate, reliable and <b>accessible</b> records of its work to support its business and maintain a sufficient archive of its activities (<i>RMP</i> Introduction).</p> <p>Alongside the reviewed <i>RMP</i>, the Keeper has been provided with the Scottish Parliament's <i>Records Management Maturity Model</i> which requires that "Records systems should be designed to meet the [Scottish Parliament]'s operational needs and using them should be an integral part of business operations and processes. They should be easy to understand and use, enable easy retrieval of information and set up in a way that enables routine RM processes to take place. Records systems should enable the context of each record and its relationship to other records to be understood (e.g. through classification in a file plan and/or through the application of appropriate metadata) and for groups of like records to be managed together. Record systems should produce an audit trail recording all actions performed on its contents."</p> <p>With this <i>Maturity Model</i> objective in mind, the Scottish parliament has the following processes in place:</p> <p><u>Digital</u></p> <p>As noted in element 4, the Scottish Parliament's principle record-keeping system is SharePoint on Microsoft's M365 platform (with an add-on to improve records management functionality). This system provides staff with a powerful search facility to allow efficient tracking of records. However, in order to fully utilise this it is important that records are consistently named and are filed in the expected containers.</p>
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			<p>The Keeper agrees that the staff guidance document <i>Records Management Procedures</i> (see element 3) provides all staff with relevant information regarding the naming conventions and filing practices necessary for efficiently tracking and identifying their public records. For example the Creation/Receipt section (<i>Records Management procedures</i> page 7 onward). The SharePoint/M365 platform automatically imposes version control on documents.</p> <p>The Information Manager (see element 2) is identified on the M365 platform as the 'Product Owner', he led the development and implementation of the M365 records management solutions. He also has been assigned 'Global Reader' access to the M365 control centre, and a similar role in the third party add-on. This gives him full access to reports which assist in understanding how users are managing public records. The Keeper has been supplied with a screen-shot showing how the Information Manager accesses reports in the control centre.</p> <p>In the Keeper's original agreement of the Scottish Parliament's <i>Records Management Plan</i> (May 2014) he agreed this element on an amber 'improvement model' basis. This meant that the Parliament had identified a gap in provision (the lack of organisation-wide audit trail provision for digital records) and provided the Keeper with evidence on how they intended to close the gap. As part of this agreement the Keeper requested to be kept informed of progress. The Keeper acknowledges that he has been kept up to date as requested. The Keeper is now content to grade this element with a Green 'compliant' status as the Scottish Parliament have provided the Keeper with details of the document tracking functionality in their digital record-keeping system.</p> <p><u>Digital Line-of-Business</u>: The Scottish Parliament operate line-of-business systems such as SEAS (Finance). The Keeper can accept these systems have record tracking functionality.</p>
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			<p><u>Physical records</u>  Hard copy records are held in secure cabinets or in a secure non-current store either in the Parliament’s estate or off-site with a records storage provider. The Scottish Parliament has provided the Keeper with evidence that they operate retrieval procedures for paper records held in all types of storage. This included sharing details a controlled tracking system managed by information management staff. The Parliament operate electronic and paper trails for all transactions relating to receipt, transfer, return and disposal of records held in storage. Samples of these ‘trails’ have been provided to the Keeper.</p> <p>The Keeper agrees The Scottish Parliament has procedures in place that will allow them to locate their records and assure themselves that the located record is the correct version.</p>
<p>12. Competency Framework for records management staff</p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>The Keeper expects staff creating, or otherwise processing records, to be appropriately trained and supported.</p> <p>As noted in element 2, Gordon Hobbs, Information Manager, is responsible for the day-to-day implementation of the <i>RMP</i>. Mr Hobbs is an information professional (MSc Information and Library Studies) and is well known to the Keeper. The Keeper agrees Mr Hobbs is suitably experienced and supported to undertake this role.</p> <p>The Information Manager states, in a <i>Statement of Responsibility</i> provided to the Keeper,: “I aim to ensure that all staff are appropriately trained and made aware of the importance of records management and of their roles and responsibilities in line with its practices. I aim to provide regular, up-to-date, relevant and practical advice to colleagues, in the day-to-day management of their records.”</p> <p>The Information Manager is supported in this objective by senior management: “I</p>

			<p>fully support the Information Manager in his day-to-day management and provision of advice and guidance to Scottish Parliamentary Service staff.” (<i>Statement of Responsibility</i> by Alan Balharrie, Chief Information Officer and Group Head for Digital Services – see element 1).</p> <p>The <i>Maturity Model</i> used by the Scottish Parliament (see element 13) requires them to have "a qualified records manager in post and a community of records management champions. Records management staff are given opportunities for professional development." The Keeper agrees that this objective is achieved.</p> <p>It is important that all staff creating, processing and otherwise managing the public records in the authority are appropriately trained and that clear guidance is provided to allow them to undertake their information tasks in line with the requirements of the organisation’s <i>Records Management Policy</i>, as detailed in the <i>RMP</i>.</p> <p>The Information Manager is responsible for "providing good practice through policies, procedures and guidance which meet our needs" and "ensuring all teams and individuals understand and can carry out their responsibilities” (<i>Records Management Procedures</i> – see element 3 – page 30).</p> <p>The Keeper has been provided with evidence that shows information governance forms part of the staff induction process and that records management guidance, including the key <i>Records Management Procedures</i> document (see element 3) are available to all staff on the organisations intranet (SP Online). All staff are expected to maintain appropriate skills by completing the records management awareness course. Records management procedures were recently updated following implementation training material availability through the authority’s intranet ‘SP Online’. The Keeper has been provided with a copy of this course.</p> <p>In their <i>Information Security Policy</i> (see element 8) the Scottish Parliament commits</p>
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			<p>to ensure that “Sufficient guidance is provided to system users regarding their responsibilities using information resources and also ensuring Information Security” and that “All applicable Information Security policies and procedures are published, applied and practiced”.</p> <p><b>The Keeper notes that the Scottish Parliament’s new performance management system is currently being implemented (RMP page 30). The Keeper would be interested in updates as far as this development affects information governance objectives.</b></p> <p>The Keeper agrees that the individual identified at element 2 has the appropriate responsibilities, resources and skills to implement the records management plan. Furthermore, he agrees that the Scottish Parliament consider information governance training for staff as required.</p>
<p>13. Assessment and Review</p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>Section 1(5)(i)(a) of the Act says that an authority must keep its RMP under review.</p> <p>The Scottish Parliament recognises this. Their overarching <i>Records Management Strategy</i> - see element 3 - commits the authority as follows: "We will monitor compliance with recognised standards, legislation and guidance issued by National Records of Scotland and assess the overall effectiveness of the function" (<i>Strategy</i> page 3).</p> <p>The Scottish Parliament <i>Records Management Plan</i> is reviewed routinely by the Information Manager (see element 2) and the results of this review are reported directly to the Chief Information Officer and Group Head for Digital Services (see element 1)</p> <p>The Scottish Parliament assesses its compliance status using a records management maturity model. The maturity model identifies gaps that need to be</p>



			<p>addressed and helps the authority populate its action plan. The Keeper has been provided with the latest maturity model in the evidence pack accompanying this reviewed plan and he agrees that it is an appropriate methodology for keeping the plan under review as required. The Keeper also notes that each element of the <i>RMP</i> features a summary from the maturity model.</p> <p>As noted under element 2, the Chief Information Officer confirms in a <i>Statement of Responsibility</i> "Through the reporting structure, the Information Manager can highlight issues and discuss strategies for the improvement of recordkeeping across the Scottish Parliamentary Service, with me directly"</p> <p>The <i>Retention Policy</i> (see element 5) is due for review by January 2026.</p> <p>The Keeper agrees that The Scottish Parliament have made a firm commitment to review their <i>RMP</i> as required by the Act and have explained who will carry out this review and by what methodology.</p>
<p>14. Shared Information</p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>The Keeper expects a Scottish public authority to ensure that information sharing, both within the Authority and with other bodies or individuals, is necessary, lawful and controlled.</p> <p>Sharing information is encouraged on the grounds of efficiency and consistency. However, any transfer of a public record, particularly when it will pass outwith the control of the records management system in the creating public authority, must be carefully considered.</p> <p>The Scottish Parliament recognises this. Their overarching <i>Records Management Strategy</i> - see element 3 - commits the authority as follows: "We will ensure that records shared with other bodies or held on their behalf by other bodies are managed in accordance with recognised standards, legislation and guidance issued</p>

			<p>by National Records of Scotland" (<i>Strategy</i> page 3). This objective is repeated in the Scottish Parliament's <i>Records Management Maturity Model</i> (see element 13) which has been shared with the Keeper.</p> <p>The Scottish Parliament routinely shares information with other bodies as they pursue their functions. This includes other public authorities.</p> <p>The Scottish Parliament undertakes these data sharing projects using information sharing agreements. The Keeper has been supplied with a sample agreement.</p> <p><b>The compliance statement against this element states that "The Scottish Parliament is committed to protecting the rights and freedoms of individuals with respect to the processing of their personal data. The Scottish Parliament operates in accordance with the Information Commissioner's Data sharing code of practice." The Keeper reminds the Parliament that controlled information sharing, under this element, also applies to public records that do <u>not</u> contain personal information. It is important that the parliament establishes how all its public records are used, securely retained and satisfactorily destroyed or returned at the outset of a sharing project with a third-party. It would be useful if, in the next iteration of the <i>RMP</i>, the compliance statement against this element could be expanded to make clear that there is a general requirement for controlled data sharing (no matter what the content of the record).</b></p> <p>In the meantime, the Keeper notes that in the Scottish Parliament's <i>Records Management Maturity Model</i> the objective "When working in partnership with other organisations which includes sharing information and contributing to joint records systems, the [Scottish Parliament] will ensure that all participating staff are aware of the records management implications and that all parties agree protocols that specify: a) What information should be</p>
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			<p>contributed and kept and by whom; b) What level of information security should be applied; c) Who should have access to the records; d) What disposal arrangements should be in place; and e) Which body holds the information for the purposes of the Act.” Is ‘defined’ rather than ‘embedded’. Subsequent to the submission of the revised RMP, the Parliament has explained that the ‘defined’ ranking in their self-assessment is in place because the Parliament does not yet engage in a quality assurance activity and limited procedures therefore currently exist. The Keeper is confident that, despite this, the Parliament has rigorous processes in place to protect shared information. She would be interested in being updated if the Parliament’s quality assurance activity is extended to information sharing procedures in the future.</p> <p>In the Keeper’s original agreement of the Scottish Parliament’s <i>Records Management Plan</i> (May 2014) he agreed this element on an amber ‘improvement model’ basis. This meant that the Parliament had identified a gap in provision (they were required to develop firm records governance procedures for data sharing) and provided the Keeper with evidence on how they intended to close the gap. As part of this agreement the Keeper requested to be kept informed of progress. The Keeper acknowledges that he has been kept up to date as requested.</p>
<p>15. Public records created or held by third parties</p>	<p><b>N/A</b></p>	<p><b>N/A</b></p>	<p>The Public Records (Scotland) Act 2011 (PRSA) makes it clear that records created by third parties when carrying out the functions of a scheduled authority should be considered ‘public records’ - PRSA Part 1 3 (1)(b).</p> <p>The <i>RMP</i> makes it clear that “None of the SPS’s [The Scottish Parliament’s] functions are managed by third parties and therefore no records are created by third parties.”</p> <p>The Keeper agrees that this element is not applicable to the records management</p>

			provision of the Scottish Parliament.
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**General Notes on submission:**

This assessment is on the *Records Management Plan* (the *RMP*) of the Scottish Parliament originally submitted to the Keeper of the Records of Scotland (the Keeper), for his review and agreement, on 2<sup>nd</sup> July 2021. The submission was updated in early 2023 and the version of the *RMP* assessed above is that provided in February 2023.

The *RMP* makes it clear that it covers the public records of the Scottish Parliament, the Scottish Parliamentary Corporate Body and the Scottish Commission for Public Audit, which are scheduled as three separate authorities under the Public Records (Scotland) Act 2011.

The *RMP* is accompanied by appropriate evidence documents and by a self-assessment *Maturity Model* showing the authority's own estimation of the records management provision in the Scottish Parliament. It is also accompanied by an endorsement *Statement of Responsibility* from Alan Balharrie, CIO and Group Head of Digital Services (see element 1), dated 29 June 2021. In this the Chief Information Officer explains that "I recognise that records management is vital for the proper functioning of any organisation and is essential in ensuring that the Scottish Parliamentary Service has accurate, reliable, secure and accessible records of its work to support its business and maintain a sufficient archive of its activities for future generations". The Keeper commends this commitment.

This is the second formal records management plan received from the Scottish Parliament by the Keeper. The first was agreed on the 23<sup>rd</sup> May 2014: [Keeper's Report \(Scottish Parliament\)](#)

The Scottish Parliament has made its Records Management Plan publicly available: [Records Management Plan - About the Parliament : Scottish Parliament](#)

The authority refers to records as a business asset (for example *Retention Policy* (see element 5) page 2 or *Information Security Policy* (see element 2) page 2). The introduction to the Records Management Policy commits the authority as follows "The [Scottish

Parliament] acknowledges that records management is an essential business activity...records form the documented history of the Scottish Parliament, the Scottish Parliamentary Corporate Body and the Scottish Commission for Public Audit." These are important recognitions and the Keeper commends them.

The *RMP* mentions the Act and is based on the Keeper's, 15 element, Model Plan <http://www.nrscotland.gov.uk/record-keeping/public-records-scotland-act-2011/resources/model-records-management-plan>.

The covering sheet of the *RMP* makes the following statement: "The Keeper of the Records of Scotland will be notified of any changes made to this records management plan in accordance with section 5(6) of the Public Records (Scotland) Act 2011." This is a welcome commitment.

The *Records Management Policy* (see element 3) explains that "There are clear personal and business benefits from good records management, including improving access to information we need, ensuring compliance with our legal obligations, keeping the information we need for as long as we need it and ensuring we maintain an archive of the Parliament's activities." (*Policy* Foreword). The Keeper agrees this statement.

The *Strategic Plan for the Scottish Parliament*: <https://www.parliament.scot/about/how-parliament-works/strategic-plan> includes aims to "Provide Members with high quality support and resources to allow them to excel in their roles as parliamentarians and representatives" and to "Efficiently provide the Parliament with high quality, effective corporate services and good governance" The Keeper agrees that robust records management provision, as detailed in this *RMP*, will help ensure these objectives are efficiently met.

## 6. Keeper's Summary

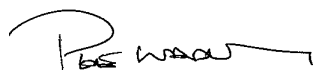
Elements **1 - 15** that the Keeper considers should be in a public authority records management plan have been properly considered by the Scottish Parliament, the Scottish Parliamentary Corporate Body and the Scottish Commission for Public Audit. Policies and governance structures are in place to implement 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 its agreed RMP as an example of good practice within the authority and the sector.

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



.....  
**Pete Wadley**  
Public Records Officer



.....  
**Liz Course**  
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 its obligations under the Act.

A handwritten signature in cursive script that reads "Laura M. Mitchell".

Laura Mitchell  
Deputy Keeper of the Records of Scotland