

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

### **Architecture and Design Scotland**

## **The Keeper of the Records of Scotland**

**6<sup>th</sup> June 2018**

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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 Architecture and Design Scotland by the Public Records (Scotland) Act 2011 Assessment Team following its submission to the Keeper on 31<sup>st</sup> October 2017.

The assessment considered whether the RMP of Architecture and Design Scotland was developed with proper regard to the 14 elements of the Keeper's statutory Model Records Management Plan (the Model Plan) under section 8(3) of the Act, and whether in this respect it complies with it and the specific requirements of the Act.

The outcome of the assessment and the Keeper's decision on whether the RMP of Architecture and Design Scotland complies with the Act can be found under section 7 of this report with relevant recommendations.

## 3. Authority Background

Architecture and Design Scotland help to implement the policies of the Scottish Government, and while they have involvement across a number of policy areas, their principal policy focus is on implementing 'Creating Places: Scotland's Policy for Architecture and Place': <http://www.gov.scot/resource/0042/00425496.pdf>

Architecture and Design Scotland were set up in 2005 by the Scottish Government and are an executive Non-Departmental Public Body (NDPB). Their stated purpose is " ...to promote the value good architecture and sustainable design adds to everyone's lives".

They quote their role as being "to help people – whether by enabling them to get more involved in shaping the places they live in or improving the design of the buildings they use."

<http://www.ads.org.uk/about-ads/>

## 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 Architecture and Design Scotland’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
<p>1. Senior Officer <i>Compulsory element</i></p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>Architecture &amp; Design Scotland (A&amp;DS) have identified Lynne Lineen, Director of Operations, as the individual with overall responsibility for records management in the authority.</p> <p>This is confirmed in a <i>Covering Statement</i> from Jim MacDonald, Chief Executive of A&amp;DS dated 26<sup>th</sup> October 2017, by the <i>Records Management Improvement Plan (see element 4)</i> and by the <i>Records Management Policy Statement (see element 3)</i>.</p> <p>Ms. Lineen is the A&amp;DS Senior Information Risk Owner (SIRO). As SIRO she has a responsibility to “Project Lead Records Management team.” <i>Lynne Lineen Workplan</i> - submitted.</p> <p>Ms. Lineen’s letter of appointment has been shared with the Keeper.</p> <p>Ms. Lineen is the author of the <i>Records Management Plan (the Plan)</i>, the <i>Records Management Improvement Plan (see element 4)</i>, the <i>Data Protection Policy (see element 9)</i>, the <i>Records Management Retention Policy and Schedule (see element 5)</i>, the <i>Version Control Policy</i>, the <i>Standard Naming Conventions Policy (for both see element 11)</i> and of the <i>Records Management Policy Statement</i>. She prepared the <i>Information Security Policy</i>.</p> <p>The Keeper agrees that Architecture &amp; Design Scotland have identified an</p>

			<p>appropriate individual to this role as required by the Public Records (Scotland) Act 2011(the Act).</p>
<p>2. Records Manager <i>Compulsory element</i></p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>The <i>Plan</i> identifies Sue Reynolds, Corporate Services Manager, as having day-to-day operational responsibility for records management within A&amp;DS.</p> <p>The <i>Plan</i> makes it clear that the Corporate Services Manager is a ‘wider role’ which includes records management.</p> <p>There is clear appointment of the Records Manager to responsibility for the actions in the <i>Records Management Improvement Plan (see element 4)</i> – see <i>Improvement Plan</i> page 2.</p> <p>Ms. Reynolds’ letter of appointment has been shared with the Keeper.</p> <p>This post is fully supported by the Director of Operations (<b>see element 1</b>). This is confirmed in a <i>Covering Statement</i> from the A&amp;DS Chief Executive and approved by the Management Team.</p> <p>The Corporate Services Manager is project lead on the SharePoint solution (Data Management Project) described in element 4 below.</p> <p>The Corporate Services Manager is the author of the <i>Information Security Policy (see element 8)</i>, the <i>Management of Emails Policy (see element 4)</i> and the <i>Business Continuity Plan (see element 10)</i>.</p> <p>Ms. Reynolds is responsible for the integrity of the corporate record (see, for example, <i>Records Management Retention Policy and Schedule</i> – see element 5 – page 1) and secure destruction (page 2).</p>

			The Keeper agrees that an appropriate individual has been identified to take day-to-day operational responsibility for records management as required by the Act.
3. Policy Compulsory element	<b>G</b>	<b>G</b>	<p>A&amp;DS has a <i>Records Management Policy Statement</i> which has been provided to the Keeper. This is version 1.0 dated October 2017 and approved by the Management Team.</p> <p>The <i>Policy Statement</i> explains the purpose of efficient records management (page 1).</p> <p>A&amp;DS have provided screen-shots showing that staff can access records management policy and guidance documents and training.</p> <p>The Keeper agrees that the submitted <i>Plan</i> supports the objectives stated in the <i>Policy</i>.</p> <p>The Keeper agrees that Architecture &amp; Design Scotland have a records management policy statement as required by the Act.</p>
4. Business Classification	<b>A</b>	<b>G</b>	<p>A&amp;DS operate a hybrid paper/electronic public record system.</p> <p>The <i>Records Management Policy Statement (see element 3)</i> states that “Effective records management will ensure that information is stored appropriately and easily retrievable.”</p> <p>In order to fulfil this aspiration, the authority has instigated a Data Management Project.</p> <p>The Data Management Project involves transferring public records from</p>



			<p>unstructured shared drives to a SharePoint solution (cloud hosted) where centralised control can be imposed using a structured business classification scheme.</p> <p>This project follows a detailed review of the records management provision in A&amp;DS. This review included an information audit and local service area questionnaire. The Keeper has been provided with a copy of the review documents. In turn, the review lead to the creation of an action plan. The Keeper has also been provided with this the <i>Records Management Improvement Plan</i>. This is version 1.0, approved by the Management Team in October 2017 and endorsed in the Chief Executive’s <i>Covering Statement</i>.</p> <p>This <i>Improvement Plan</i> identified an ongoing objective that A&amp;DS should “Agree a consistent approach to naming of documents within an approved Business Classification Scheme.” <b>(see element 11)</b>.</p> <p>The <i>Improvement Plan</i> also states “Our Records Management Plan is forward looking and incorporates a programme which will move us beyond compliance to best practice in the coming years. During implementation of the plan, we will deliver training on records management and information governance to all staff.” <b>(see element 12)</b>.</p> <p>The SharePoint solution will be supported by a recognised, third-party, records management bolt-on.</p> <p>A&amp;DS explain that “A project team has been set up to ensure the migration and transition to a new system is as seamless as possible. The project team will consider how to progress the business classification mechanisms as part of the migration project.” The Keeper agrees this action.</p>
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			<p>The Data Management Project is confirmed in the <i>Records Management Retention Policy and Schedule</i> (see element 5) page 2.</p> <p>The Keeper has been provide with reports on the progress of the Data Management Project (such as to the A&amp;DS Audit Committee). Also provided are minutes of the A&amp;DS Board showing that they are kept informed of the project, including the requirements of the Act. For example <i>Board Minutes</i> 14 August 2017 "Progress has been made on the Data Management Project which is on track to make a submission to the Keeper". These reports and minutes combined with the statements in the Chief Executive's <i>Covering Statement</i>, are accepted by the Keeper as evidence of support for the project at a high level in the authority. A&amp;DS Board Minutes (and other Corporate Documents are available at <a href="https://www.ads.org.uk/about-ads/corporate-documents/">https://www.ads.org.uk/about-ads/corporate-documents/</a>)</p> <p>The Keeper agrees that the Data Management Project will help A&amp;DS fulfil requirements in their <i>Records Management Policy Statement and Records Management Retention Policy and Schedules</i> (see element 5).</p> <p>A&amp;DS have a <i>Management of Emails Policy</i> which has been provided to the Keeper. This is version 1.0 approved by the Management Team in September 2017. The Keeper commends the recognition of the particular risks around e-mail.</p> <p><b>The Keeper can agree this Element on an 'improvement model' basis. This means that the authority has identified gaps in provision (transfer of records from shared drives to a new records management system not completed). However, the Keeper recognises that Architecture &amp; Design Scotland have identified how they intend to close this gap and are clearly committed to doing so. The Keeper's agreement is dependent upon him being kept informed of progress with this work when required.</b></p>
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<p>5. Retention schedule</p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>The A&amp;DS <i>Records Management Policy Statement</i> (<b>see element 3</b>) states that all staff have a responsibility to retain records in line with a <i>Retention and Disposal Schedule</i>. With this in mind, a <i>Records Management Retention Policy and Schedule</i> has been provided to the Keeper – version 1.0 approved by the Management Team in October 2017 – and screen-shots have been provided showing that staff have access to this document.</p> <p>Staff have been introduced to the operation of the retention schedule in a series of meetings.</p> <p>A the title suggests, the <i>Records Management Retention Policy and Schedule</i> combines the overarching policy and the detailed retention decisions in a single document with annex. Where practical (as in this case), the Keeper commends the merger of the two into a single source for staff.</p> <p>The A&amp;DS retention schedule is publically available at <a href="http://www.ads.org.uk/wp-content/uploads/5324_2011-07-04-record-retention-series-full-2.pdf">http://www.ads.org.uk/wp-content/uploads/5324_2011-07-04-record-retention-series-full-2.pdf</a> <b>although this version seems to be less complete than the one the Keeper has received.</b></p> <p>The <i>Plan</i> (page 22) states that “A&amp;DS recognises the need to ensure records are routinely assigned disposal dates and that they are subsequently destroyed by a secure mechanism at the appropriate time, or preserved permanently by transfer to the National Records of Scotland.” The Keeper agrees that the <i>Records Management Retention Policy and Schedule</i> should be an appropriate tool to help staff achieve this objective.</p> <p>The Data Management Project (<b>see element 4</b>) included the creation of the retention decisions using a questionnaire (supplied in evidence) to local business</p>
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			<p>areas. The Keeper commends the inclusion of local service areas in the creation of retention decisions as most likely to result in a strong business tool and to engender 'buy-in'.</p> <p>The <i>Plan</i> (page 23) explains the process for marking up hard-copy records with retention periods.</p> <p>The <i>Plan</i> (also page 23) commits A&amp;DS to review and update the <i>Records Management Retention Policy and Schedule</i> once the SharePoint solution (<b>see element 4</b>) is fully operational: "Once A&amp;DS has moved over to Office365 and SharePoint, the procedure for retention of data will be reviewed and updated accordingly." The Keeper agrees this action.</p> <p>The Keeper agrees that Architecture &amp; Design Scotland have an operational retention schedule that appears to cover all the record types that might be expected to be created by the activities undertaken as the authority carries out its functions.</p>
<p>6. Destruction Arrangements <i>Compulsory element</i></p>	<p><b>A</b></p>	<p><b>G</b></p>	<p>The <i>Records Management Policy Statement</i> (<b>see element 3</b>) states that "Effective records management will ensure that information is "<u>destroyed</u> or preserved in accordance with A&amp;DS's retention schedule".</p> <p>The <i>Records Management Improvement Plan</i> (<b>see element 4</b>) identified an ongoing objective that A&amp;DS should "Ensure the disposal of information assets processes are fit for purpose."</p> <p>With these commitments in mind, A&amp;DS has the following procedures in place for the destruction of records:</p> <p><u>Paper (internal)</u>: Hard-copy public records are securely destroyed using in-house shredders (details supplied) or by a third party confidential waste company. A</p>

			<p>contract and a certificate of destruction have been provided as evidence that these arrangements are operational.</p> <p><u>Paper (external):</u> A&amp;DS does not currently hold any paper records externally.</p> <p><u>Electronic:</u> <b>In common with many Scottish public authorities, A&amp;DS is not satisfied that the controlled deletion of those records held electronically on shared drives is being universally carried out efficiently. With this in mind, they state in the <i>Plan</i> (page 28) “In relation to electronic records, A&amp;DS recognises there is work to be done which will be considered as part of the project to transfer data to the Cloud and to implement Office 365 and SharePoint. This has been included on the Records Management Improvement Plan.” (see element 4 for the project – the Keeper has been provided with a copy of the <i>Improvement Plan</i>). The Corporate Services Manager (see element 2) is lead officer on these improvements. The Keeper agrees that the work described as part of the Data Management Project should greatly enhance the authority’s ability to control the systematic deletion of electronic records. The ‘Future Developments’ box against this element commits that: “Regular audits will be undertaken to ensure confidential waste is being disposed of correctly.” The Keeper welcomes this commitment and requires that A&amp;DS report progress when appropriate.</b></p> <p><u>Hardware:</u> Destruction of records held on redundant hardware is carried out by a third party provider. A&amp;DS have provided the Keeper with various documents as evidence that this process is operational.</p> <p><u>Back-Ups:</u> A&amp;DS, quite correctly, take back-up copies for business continuity purposes. Back-up copies are taken on tape by the authority’s ICT supplier and the tapes are then stored with a third-party storage contractor. This process is</p>
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			<p>confirmed in the <i>Plan</i> (page 23). The <i>Plan</i> does not make it clear how long these tapes are held by the storage contractor before being over-written. However, the Keeper has received a separate e-mail from the ICT supplier explaining this and therefore he can be confident that A&amp;DS are certain of how long continuity copies of public records remain available.</p> <p><b>The Keeper agrees this element of A&amp;DS’s <i>Records Management Plan</i> under ‘improvement model’ terms. This means that an authority has identified a gap in its records management provision (in this case that the deletion of electronic records is not fully developed), but has put processes in place to close that gap. The Keeper’s agreement is conditional on his being updated as the project progresses.</b></p>
<p>7. Archiving and Transfer <i>Compulsory element</i></p>	<p><b>A</b></p>	<p><b>G</b></p>	<p>The <i>Records Management Policy Statement (see element 3)</i> states that “Effective records management will ensure that information is “destroyed or <u>preserved</u> in accordance with A&amp;DS’ retention schedule”.</p> <p>This is supported by statements in the <i>Records Management Retention Policy and Schedule (see element 5)</i>. For example at page 4: “These will be records that show the significance of the functions and activities of A&amp;DS in respect of:</p> <ul style="list-style-type: none"> <li>• The history of A&amp;DS, its organisation, policies and achievements”</li> </ul> <p>A&amp;DS have identified the National Records of Scotland (NRS) as the appropriate repository to ensure the preservation of records.</p> <p><i>A Memorandum of Understanding</i> regarding the transfer of records from A&amp;DS to NRS is being negotiated at the time of this assessment. This is confirmed by the NRS Client Management Team.</p>

			<p>A&amp;DS have made the following statement in the “Future Developments” against this element: “Progress work with National Records of Scotland to finalise a Memorandum of Understanding.”</p> <p>The pursuit of formal archiving arrangements is supported by statements in the A&amp;DS <i>Information Security Policy</i> (see element 8) page 3.</p> <p><b>The Keeper agrees this element of A&amp;DS’ <i>Records Management Plan</i> under ‘improvement model’ terms. This means that he acknowledges that the authority has identified a gap in provision (there is no formal transfer agreement with an archive) and have put processes in place to close that gap. The Keeper’s agreement is conditional on his PRSA Assessment Team being provided with a copy of the signed MOU when available.</b></p>
<p>8. Information Security <i>Compulsory element</i></p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>A&amp;DS have an <i>Information Security Policy</i> which has been provided to the Keeper. This is version 1.0 approved by the Management Team in September 2017.</p> <p>The <i>Information Security Policy</i> is supported by a suite of complimentary policy and guidance documents, such as <i>Managing the Departure of Staff Policy</i> which have also been supplied to the Keeper.</p> <p>A&amp;DS have considered the physical security of public records (for example as explained at <i>Plan</i> page 22 and <i>Information Security Policy</i> page 1).</p> <p>The <i>Information Security Policy</i> provides instructions for reporting ‘Breaches and Near Misses’.</p> <p>A&amp;DS have provided screen-shots showing that staff can access information security documents and training.</p>

			<p>The Keeper agrees that A&amp;DS has appropriate measures in place to protect its information and systems.</p>
<p>9. Data Protection</p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>A&amp;DS have a <i>Data Protection Policy</i> which has been shared with the Keeper. This is version 1.0 approved by the Management Team in September 2017.</p> <p>A&amp;DS state in the <i>Data Protection Policy</i> (page 1): “A&amp;DS regards the lawful and correct treatment of personal information as of vital importance to maintaining trusted and positive working relationships with the various groups of individuals whose personal data A&amp;DS holds and to successful business operations.” The Keeper commends this statement.</p> <p>A&amp;DS are registered as a data controller with the Information Commissioner: Z2007283.</p> <p>The Public have access to subject access request procedures through the Architecture &amp; Design Scotland website: “How do I access personal information held at Architecture and Design Scotland?” at <a href="http://www.ads.org.uk/about-ads/freedom-of-information/">http://www.ads.org.uk/about-ads/freedom-of-information/</a></p> <p>The <i>Data Protection Policy</i> explains the (current) 8 principles of data protection (page 2).</p> <p>A&amp;DS have provided screen-shots showing that staff can access the data protection policy and guidance documents and training.</p> <p>The A&amp;DS <i>Information Security Policy</i> (<b>see element 8</b>) has a section dedicated to data protection.</p> <p>The Keeper agrees that Architecture &amp; Design Scotland have properly considered</p>



			their responsibilities under the Data Protection Act 1998.
10. Business Continuity and Vital Records	<b>G</b>	<b>G</b>	<p>A&amp;DS has a Business Continuity Plan (BCP) which sets out how the organisation should respond to emergencies. The BCP was approved by the Audit Committee and Board. This has been provided to the Keeper – version 1.0 approved 8 May 2017. The Keeper agrees the BCP includes recovery of public records in an emergency.</p> <p>A&amp;DS, take back-up copies of electronic public records (taken on tape by the ICT supplier and then stored with a third-party storage contractor). This process is confirmed in the <i>Plan</i> (page 23). Record recovery is explained under element 10 (page 46).</p> <p>A business continuity plan including disaster recovery is a requirement of the A&amp;DS <i>Information Security Policy</i> (<b>see element 8</b>).</p> <p>A&amp;DS maintains a small number of vital records. They state (<i>Plan</i> page 46) “An exercise has been carried out to identify vital records, necessary for retrieval in a disaster recovery situation and these are copied into the BCP pack which is held in a paper format outwith the office.” The Keeper commends this.</p> <p>Sue Reynolds, Corporate Services Manager (and Records Manager) (<b>see element 2</b>) is A&amp;DS Business Continuity Lead.</p> <p>The Keeper agrees that Architecture &amp; Design Scotland have processes in place to recover records in an emergency and have considered the prioritisation of records vital to their business.</p>
11. Audit trail	<b>A</b>	<b>G</b>	The <i>Records Management Policy Statement</i> ( <b>see element 3</b> ) states that “Effective

			<p>records management will ensure that information is stored appropriately and easily retrievable.” The <i>Records Management Retention Policy and Schedule</i> (<b>see element 5</b>) states that “Any authorised annotation, addition or deletion to a record should be traceable.” and that “a useable record is one that can be located, retrieved...”</p> <p>The <i>Plan</i> (page 49) states that “A&amp;DS recognise the need to be able to find records and to be able to determine the correct and most up to date version is being accessed. A&amp;DS also recognise that consideration must be made for both paper and electronic records.”</p> <p>The <i>Records Management Improvement Plan</i> (<b>see element 4</b>) identified an ongoing objective that A&amp;DS should “Agree a consistent approach to naming of documents within an approved Business Classification Scheme.”</p> <p>The Keeper acknowledges that any line-of-business systems used by A&amp;DS, such as SAGE, may impose suitable naming convention/version control at time of record-creation to adequately track records subsequently. However, the current shared drive system will not do this and the proposed SharePoint solution, while automatically recording version numbers, will require staff to follow naming conventions.</p> <p>With these principles in mind A&amp;DS have the following procedures in place to track public records:</p> <p>Naming Conventions: A&amp;DS have provided staff with guidance on naming conventions to allow efficient record searches. The Keeper has been provided with the authority’s <i>Standard Naming Conventions Policy</i>. This is v1.0 approved by the Management Team in September 2017.</p>
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			<p>Version control: A&amp;DS have provided staff with guidance on version control to allow identification of the latest version of a record. The Keeper has been provided with the authority's <i>Version Control Policy</i>. This is v1.0 approved by the Management Team in September 2017.</p> <p>The use of naming conventions and version control is supported by statements in the <i>Records Management Retention Policy and Schedule (see element 5)</i> page 2.</p> <p>However, A&amp;DS state "A&amp;DS have commenced work on this area and recognises that further work will be required as work on data management progresses." This directly relates to the work explained in element 4 above. The Keeper agrees that SharePoint should offer more consistent record tracking than the previous arrangement.</p> <p>The Keeper has been provided with the <i>A&amp;DS Records Management Improvement Plan</i> version 1.0 approved by the Management Team in October 217 and endorsed in the Chief Executive's <i>Covering Statement</i>.</p> <p>A&amp;DS have provided screen-shots showing that staff can access records management policies, guidance documents and training.</p> <p><u>Paper (external):</u> A&amp;DS does not currently hold any paper records externally.</p> <p><b>The Keeper is able to agree this element of Architecture &amp; Design Scotland's records management plan on improvement model terms. This means that the authority have identified a gap in their records management provision (in this case, naming and tracking of records on shared drives is not satisfactorily controlled and the SharePoint solution is not yet fully imbedded). The Keeper agrees that A&amp;DS has committed to a programme designed to alleviate the</b></p>
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			<p><b>situation and close the gap. The Keeper’s agreement is conditional on his receiving updates when requested.</b></p>
<p>12. Competency Framework for records management staff</p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>Ms. Reynolds’s <i>Workplan</i> (provided) shows that she is responsible for “effective and appropriate management of A&amp;DS’s records from their creation, right through to their eventual disposal”.</p> <p>A&amp;DS have provided strong evidence of appropriate training for Ms. Reynolds including details of external, commercial training courses that she has attended.</p> <p>The Keeper notes that Ms. Reynolds is supported by Ms. Lineen (<b>see element 1</b>) who has also undertaken extensive records management training (evidence supplied).</p> <p>The provision of appropriate training for A&amp;DS’ records management team is specifically mentioned in the Chief Executive’s <i>Covering Statement</i>.</p> <p>The A&amp;DS <i>Records Management Improvement Plan</i> (<b>see element 4</b>) identified an ongoing objective that A&amp;DS should “ensure all staff are aware of their responsibilities around data management.” To this end A&amp;DS has committed to creating a “comprehensive training pack for all staff” (<i>Records Management Improvement Plan</i> page 3). This is an objective for the Corporate Services Manager. <b>The Keeper would welcome sight of this training pack when available.</b></p> <p>A&amp;DS commit to encouraging a culture of effective records management. The Chief Executive states (<i>Covering Statement</i>): “During implementation of the plan, we will deliver training on records management and information governance to all staff ensuring that culture of information management is embedded within A&amp;DS.” This is supported under Statement of Compliance (page 3) and at page 57. The Keeper strongly commends this approach.</p>

			<p>A&amp;DS has corporate membership of the Information and Records Management Society.</p> <p>A&amp;DS have provided screen-shots showing that staff can access information governance policy and guidance documents and training.</p> <p>A&amp;DS have committed to introducing key information governance policies at induction (for example <i>Plan</i> page 22).</p> <p>The Keeper agrees that Architecture &amp; Design Scotland recognises the importance of records management and provides staff with access to relevant training.</p>
<p>13. Assessment and Review</p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>The Act requires a scheduled public authority to “keep its records management plan under review” (part 1 5.1 (a)). The <i>Plan</i> commits A&amp;DS as follows “The Records Manager will ensure that a second assessment review is carried out within twelve months following submission of the records management plan and thereafter annually.”</p> <p>Using the <i>Records Management Improvement Plan (see element 4)</i> as a base, the Records Manager (<b>see element 2</b>) will formally review the <i>Plan</i> annually. This annual review will be reported to the A&amp;DS Audit Committee. In the period between reviews the Records Manager will report to the A&amp;DS Management Team where data management is a standing agenda item.</p> <p>It is also proposed that A&amp;DS internal auditors are involved in reviewing the information governance provision in the authority. At time of submission this could not be confirmed. <b>The Keeper would be very interested in an update on this proposal as he has encouraged the involvement of internal audit in other authorities.</b></p>

			<p>The Keeper notes a further proposal: “It is proposed that the RM formally reviews the RMIP [Records Management Improvement Plan] on an annual basis and submit this to NRS to keep them updated of progress.” and “once approved will be submitted to the Keeper as evidence of A&amp;DS’ commitment to improving record keeping in the organisation.” He welcomes this idea and will ensure his assessment team contacts A&amp;DS for an informal, and entirely voluntary, update annually.</p> <p>Prior to creating the <i>Records Management Improvement Plan</i> A&amp;DS undertook a detailed review of the records management provision. This included an information audit and service area questionnaire. The Keeper has been provided with a copy of the review documents.</p> <p>The <i>Data Protection Policy</i> (<b>see element 9</b>) is due for review by September 2018.</p> <p>The <i>Records Management Improvement Plan</i> (<b>see element 4</b>) and the <i>Records Management Retention Policy and Schedule</i> are due for review by October 2018.</p> <p>The <i>Information Security Policy</i> (<b>see element 8</b>), the <i>Version Control Policy</i>, the <i>Standard Naming Conventions Policy</i> (<b>for both see element 11</b>) and the <i>Management of Emails Policy</i> (<b>see element 4</b>) are due for review by September 2019.</p> <p>The <i>Records Management Policy Statement</i> (<b>see element 3</b>) is due for review by October 2019.</p> <p>A&amp;DS registration with the Information Commissioner is currently due to be renewed by 21 January 2019.</p> <p>All Business continuity and site emergency plans are tested at least annually.</p>
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			The Keeper agrees that Architecture & Design Scotland has measures in place to ensure that its <i>Records Management Plan</i> and supporting policies and procedures can be kept up-to-date.
14. Shared Information	N/A	N/A	<p>Architecture &amp; Design Scotland state: “we can confirm A&amp;DS does not undertake systematic data sharing with other organisations”</p> <p>The Keeper agrees that, as this is the case, element 14 does not apply to this authority.</p>
15. Freedom of Information	G	G	<p>The <i>Plan</i> states that “A&amp;DS is committed to the discharge of its functions under FOISA and EIRs. A&amp;DS has a Publication Scheme which is promoted on the A&amp;DS website.”</p> <p><a href="https://www.ads.org.uk/freedom-of-information-model-publication-scheme-2015/">https://www.ads.org.uk/freedom-of-information-model-publication-scheme-2015/</a></p> <p>Freedom of information guidance for the public is available on the A&amp;DS website: <a href="https://www.ads.org.uk/about-ads/freedom-of-information/">https://www.ads.org.uk/about-ads/freedom-of-information/</a></p> <p>The Records Manager (<b>see element 2</b>) is responsible for monitoring FOI requests in the authority.</p> <p>The Keeper agrees that Architecture &amp; Design Scotland has properly considered its responsibilities under the Freedom of Information (Scotland) Act 2002.</p>

## Architecture and Design Scotland

### General Notes on RMP, Including Concerns:

This assessment is on the *Records Management Plan* (the *Plan*) of Architecture & Design Scotland (A&DS) version 1.1 of the document approved by A&DS Management Team 26<sup>th</sup> October 2017 and submitted to the Keeper of the Records of Scotland for agreement on 31<sup>st</sup> October 2017.

The *Plan* includes by a *Covering Statement* from Jim MacDonald, Chief Executive in the authority. The *Covering Statement* endorses the *Records Management Improvement Plan* (**see element 4**) and explains the steps already taken towards improving A&DS' records management provision. He also clearly delegates responsibility for records management to the A&DS Director of Operations (**see element 1**).

As noted above, the *Plan* is accompanied by Architecture & Design Scotland's *Records Management Improvement Plan*. The Records Manager (**see element 2**) owns all the actions in this *Plan*.

A&DS acknowledges records as a business asset (for example *Records Management Improvement Plan* page 1 and *Information Security Policy* (**see element 8**) page 2. The Keeper commends this recognition.

The *Plan* states (Control Sheet): "The Keeper of the Records of Scotland will be alerted to any changes that are made to this Records Management Plan..." The Keeper thanks A&DS for this commitment.

The *Plan* is based on the Keeper's, 14 element, Model Plan <http://www.nrscotland.gov.uk/record-keeping/public-records-scotland-act-2011/resources/model-records-management-plan> with the addition of a 15<sup>th</sup> element 'Freedom of Information'.



The Keeper agrees that the *Plan* supports an effective, resilient and customer-focused Corporate Service Team. See under 'Performance and impact' in Architecture and Design Scotland Corporate Strategy 2017 – 2020: [http://www.ads.org.uk/wp-content/uploads/FINAL\\_ADS-Corporate-Strategy-2017-2020-03-05-17-singles.pdf](http://www.ads.org.uk/wp-content/uploads/FINAL_ADS-Corporate-Strategy-2017-2020-03-05-17-singles.pdf)

Third Parties:

The Act makes it clear that records created by a contractor in carrying out a scheduled authority's functions are public records (Part 1 section 3.1 (b)).

A&DS state (Plan page 18): "The Data Management Project team have considered whether any 3<sup>rd</sup> parties manage records on behalf of A&DS and have concluded there are no such records to be considered."

## 6. Keeper's Summary

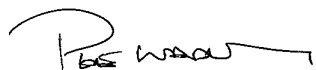
Elements 1 - 15 that the Keeper considers should be in a public authority records management plan have been properly considered by Architecture and Design Scotland. Policies and governance structures are in place to implement the actions required by the plan.

## 7. Keeper's Determination

Based on the assessment process detailed above, the Keeper **agrees** the RMP of **Architecture and Design Scotland**.

- The Keeper recommends that Architecture and Design Scotland should publish its agreed RMP as an example of good practice within the authority and the sector.

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



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

.....  
**Robert Fotheringham**  
Public Records Officer

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

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

A handwritten signature in cursive script, reading "Laura Mitchell". The signature is written in black ink on a light-colored background.

.....  
**Laura Mitchell**  
Deputy Keeper of the Records of Scotland