

Public Records (Scotland) Act 2011

Board of Trustees for the National Galleries of Scotland Assessment Report

The Keeper of the Records of Scotland

24th May 2016

Contents

1. Public Records (Scotland) Act 20113
2. Executive Summary.....4
3. Authority Background4
4. Assessment Process5
5. Model Plan Elements: Checklist.....6
6. Keeper’s Summary 22
7. Keeper’s Determination 22
8. Keeper's Endorsement.....23

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 **Board of Trustees for the National Galleries of Scotland** by the Public Records (Scotland) Act 2011 Assessment Team following its submission to the Keeper on **1st March 2016**.

The assessment considered whether the RMP of the Board of Trustees for the National Galleries of 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 the Board of Trustees for the National Galleries of Scotland complies with the Act can be found under section 7 of this report with relevant recommendations.

3. Authority Background

The purpose of the National Galleries of Scotland (NGS) as set out in the governing legislation (the National Heritage (Scotland) Act 1985) is to:

- care for, preserve and add to the objects in their collections;
- ensure that the objects are exhibited to the public;
- ensure that the objects are available to persons seeking to inspect them in connection with study or research; and generally to promote the public's enjoyment and understanding of the fine arts;
- and for those purposes to provide education, instruction and advice and to carry out research.

The National Galleries of Scotland look after one of the world's finest collections of Western art ranging from the Middle Ages to the present day. These holdings include the national collection of Scottish art displayed in an international context.

The National Galleries of Scotland is governed by a Board of Trustees. There are up to 12 trustees on the Board at any one time and they are appointed by Scottish Ministers through an open appointments system.

Trustees are appointed for a four year term of office in the first instance and may be offered a second term.

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 Board of Trustees for the National Galleries of Scotland RMP was developed with proper regard to the elements of the Model Plan and is compliant with the Act. The assessment also considered whether there was sufficient supporting evidence of such compliance.

Key:

| | | | | | | | |
|----------|--|--|----------|--|--|----------|--|
| G | The Keeper agrees this element of an authority's plan. | | A | The Keeper agrees this element of an authority's plan as an 'improvement model'. This means that he is convinced of the authority's commitment to closing a gap in provision. He will request that he is updated as work on this element progresses. | | R | There is a serious gap in provision for this element with no clear explanation of how this will be addressed. The Keeper may choose to return the RMP on this basis. |
|----------|--|--|----------|--|--|----------|--|

5. Model Plan Elements: Checklist

| Element | Present | Evidence | Notes |
|---|---------|----------|--|
| 1. Senior Officer <i>Compulsory element</i> | G | G | <p>The Board of Trustees for the National Galleries of Scotland ('the Board') have identified Sir John Leighton , Director General of the National Galleries, as the individual with overall responsibility for records management in the authority.</p> <p>This is confirmed by a <i>Letter of Endorsement</i> from Sir John dated 22 February 2016.</p> <p>Sir John is the Senior Accountable Officer of the National Galleries of Scotland and takes the role of the authority's Chief Executive Officer.</p> <p>Sir John chairs the Board's Senior Management Team who have approved the <i>Plan</i> and many of the evidential documents submitted. The Senior Management Team agreed that "the Director-General would have overall strategic responsibility for records management" (minutes of meeting submitted as evidence).</p> <p>The Keeper agrees that the Board have identified an appropriate individual to this role as required by the Act.</p> |
| 2. Records Manager <i>Compulsory element</i> | G | G | <p>The Board have identified Andy Connor, Records Management Advisor as the individual with day-to-day responsibility for implementing the <i>Plan</i> in the authority.</p> <p>This is confirmed by a <i>Letter of Endorsement</i> from Sir John Leighton (see element 1) dated 22 February 2016.</p> <p>Mr Connor's role is also confirmed by the <i>Records Management Advisor Job</i></p> |

| | | | |
|----------------------|----------|----------|--|
| | | | <p><i>Description</i> submitted in evidence (see element 12).</p> <p>Mr Connor created the <i>Records Management Policy</i> (see element 3), the <i>Retention Schedule</i> and the <i>Retention Schedule Guidance</i> document (for both see elements 4 and 5), the <i>Records Disposal Policy</i> (see element 6), the <i>Information Handling and Security Policy</i> (see element 8), the <i>Document Naming & Version Control Guidance</i> document (see element 11), the <i>Records Management Learning Module</i> (see element 12), the <i>Review Schedule</i> (see element 13), the <i>Email Guidance</i> document, the <i>Scanning Guidance</i> document, the <i>Iron Mountain Records Store</i> procedural document, the <i>Information Classification Procedure</i>, the <i>Disclosure Handling Policy</i>, and, jointly, the <i>Archives Collection Policy</i>.</p> <p>The above demonstrates that Mr Connor has a detailed knowledge of the records management provision in the authority.</p> <p>The <i>Letter of Endorsement</i> and the text of the <i>Plan</i> make it clear that the Records Management Advisor role will be taken over by the Head of Performance and Planning (a more senior role) in the future. The Head of Performance and Planning reports directly to the Director General (see element 1). The Keeper notes that the Head of Performance and Planning is already ‘owner’ of several of the information governance documents submitted in evidence. The Keeper requires that he is informed when this change takes place so that he may keep the Board’s PRSA submission up-to-date.</p> <p>The Keeper agrees that the Board of Trustees for the National Galleries of Scotland have identified an appropriate individual to this role as required by the Act.</p> |
| 3. Policy Compulsory | G | G | The Board has a <i>Records Management Policy</i> (the <i>Policy</i>) which has been supplied to the Keeper. |

| | | | |
|-----------------------------------|-----------------|-----------------|---|
| <p><i>element</i></p> | | | <p>This is version 1.0 approved by the Senior Management Team and published in September 2015.</p> <p>A screen-shot has been supplied as evidence that the Board’s staff have access to this document on their intranet.</p> <p>The Keeper agrees that the <i>Plan</i> supports the objectives of the <i>Policy</i>.</p> <p>The <i>Policy</i> was created by the Records Management Advisor (see element 2).</p> <p>The <i>Policy</i> refers to records as a business “asset”. The Keeper commends this recognition.</p> <p>The <i>Policy</i> explains the purpose of good records management.</p> <p>The <i>Policy</i> mentions the Public Records (Scotland) Act 2011 (‘the Act’).</p> <p>The Keeper agrees that the Board of Trustees for the National Galleries of Scotland have a records management policy statement as required by the Act.</p> |
| <p>4. Business Classification</p> | <p>G</p> | <p>G</p> | <p>It is a principle of the Board’s <i>Records Management Policy</i> (see element 3) that “records should be held in a managed system”.</p> <p>To this end the Board have a combined business classification scheme/retention schedule document showing the Board’s <u>functions/activities</u> and the records types created while pursuing those activities. This must remain a business decision for the Board, but the Keeper acknowledges that a file plan based on <u>function</u> (rather than organisational hierarchy) is currently considered best practice.</p> |

| | | | |
|-----------------------|----------|----------|---|
| | | | <p>This 95 page document, titled ‘<i>Records Retention Schedule 1.1</i>’, has been provided to the Keeper.</p> <p>A sample entry from this document: INFORMATION MANAGEMENT/Records management/Disposal certificates/20 years/Destroy</p> <p>A screen-shot has been supplied as evidence that the Board’s staff have access to the <i>Records Retention Schedule</i> on their intranet.</p> <p>Despite the statement in the <i>Plan</i> (page 4) that the Board “is currently developing a business classification scheme”. The supplied <i>Records Retention Schedule</i> is quite sufficient under this element for the purposes of the Act.</p> <p>However, the Keeper has taken note that, as well as the <i>Records Retention Schedule</i>, the Board intend to create a separate <i>Business Classification Scheme</i> as a business tool and have shared details on how this will appear in the form of a draft. For completeness the Keeper requests that he is provided with a copy of the new document when approved by NGS management.</p> <p>The Board operates a hybrid system with both electronic and paper records. Some paper records are outstored with a commercial storage company.</p> <p>The Keeper agrees that the Board has a ‘business classification scheme’, in the form of a detailed retention schedule, that appropriately reflects the functions of the authority.</p> |
| 5. Retention schedule | G | G | <p>It is a principle of the Board’s <i>Records Management Policy</i> (see element 3) that “records will be disposed of in accordance with the NGS Records Retention Schedule”.</p> |

| | | | |
|--|-----------------|-----------------|--|
| | | | <p>For details of the combined business classification scheme/retention schedule see element 4 above.</p> <p>The Keeper acknowledges that combining a business classification scheme and a retention schedule is liable to create a stronger business tool for an authority.</p> <p>The <i>Retention Schedule</i> is supported by a <i>Retention Schedule Guidance</i> document which has been provided to the Keeper. This is version 1.0 published in December 2015.</p> <p>A screen-shot has been supplied as evidence that the Board’s staff has access to the <i>Retention Schedule Guidance</i> on the Intranet.</p> <p>The Keeper agrees that the Board has a retention schedule matched (and, in fact, combined) with the business classification scheme.</p> |
| <p>6. Destruction Arrangements <i>Compulsory element</i></p> | <p>G</p> | <p>G</p> | <p>The Board has a <i>Records Disposal Policy</i> which has been supplied to the Keeper.</p> <p>This is version 1.0 approved by the Senior Management Team and published in September 2015.</p> <p>A screen-shot has been supplied as evidence that the Board’s staff have access to this document on their intranet.</p> <p>The <i>Plan</i> states (page 3): “Proper disposal ensures that we retain records only for as long as necessary and then destroy them using an appropriate method or, where appropriate, transfer them for archiving.” (see element 7 for archiving)</p> <p>With this in mind the Board have the following procedures in place:</p> |

| | | | |
|--|-----------------|-----------------|---|
| | | | <p><u>Paper:</u> Internal hard copy records are destroyed using a third-party shredding company. A shredding certificate has been provided as evidence that these arrangements are operational. Hard copy records held in the commercial store are destroyed locally under instruction from the Board. A destruction certificate has been provided as evidence that these arrangements are operational.</p> <p><u>Electronic:</u> Procedure for the irretrievable destruction of records held electronically is explained in the <i>Records Disposal Policy</i>. This shows how heads of departments, team managers and individual employees have responsibility for engaging with the retention schedule and assuring that records are deleted from systems when appropriate.</p> <p><u>Hardware:</u> The secure destruction of records held on redundant hardware is carried out by a third party contractor. A certificate of data removal has been provided as evidence that this arrangement is operational.</p> <p><u>Back-Ups:</u> The Board have submitted their <i>IT Back-Up Process</i> which shows electronic records are protected for continuity purposes (see also element 10). This document details the back-up cycle including how long records remain available before they are irretrievably deleted.</p> <p>The Keeper agrees that the Board have procedures in place to ensure the secure and irretrievable destruction of records when appropriate.</p> |
| <p>7. Archiving and Transfer <i>Compulsory element</i></p> | <p>A</p> | <p>G</p> | <p>The <i>Policy</i> recognises that certain records have long-term archival value to the organisation (for example <i>Policy</i> page 3).</p> <p>Archival records fall in to two categories.</p> |

| | | | |
|--|--|--|--|
| | | | <p>1. Records that have direct relevance to the study of the Galleries' collections and that "document the foundation of NGS, its history and accomplishments" (<i>Archives Collection Policy</i> page 2)</p> <p>These records are catalogued to ISAD(G) standard and are made available to researchers in the galleries. The Keeper agrees that "NGS has facilities at each of the three main gallery sites for staff and the public to arrange appropriate access." (<i>Plan</i> page 4) Procedures for the transfer of this type of record is explained in the Board's <i>Archives Collection Policy</i> which has been supplied to the Keeper.</p> <p>This is version 1.0 approved by the Senior Management Team and published in November 2015 (minute of approval included in evidence pack).</p> <p>A screen-shot has been supplied as evidence that the Board's staff have access to this document on their intranet.</p> <p>The <i>Archives Collection Policy</i> was created jointly by the Records Management Advisor (see element 2) and the Board's Archivist.</p> <p>2. Other corporate records of enduring value, but which have less significance for art/art-history researchers.</p> <p>The Board have identified the National Records of Scotland as the repository to which it will transfer these records.</p> <p>An MOU will be created between the Board and the National Records of Scotland to formally document this arrangement. When this is in place the Keeper will require a copy to be provided for the PRSA submission.</p> <p>The Keeper suggests that, once negotiations with NRS are concluded, the</p> |
|--|--|--|--|

| | | | |
|--|-----------------|-----------------|--|
| | | | <p>Records Retention Schedule (see elements 4 and 5) could be amended to differentiate between records archived locally and those transferred to NRS under the MOU.</p> <p>The Keeper can agree this element of the Board's <i>Plan</i> under 'improvement model' terms. This mean that the authority has identified a suitable repository for records selected for permanent preservation and have put processes in place to formalise transfer arrangements. The Keeper's agreement is conditional on the MOU, between NRS and the Board being, created, signed and forwarded to the PRSA Assessment Team.</p> |
| <p>8. Information Security <i>Compulsory element</i></p> | <p>G</p> | <p>G</p> | <p>The Board has an <i>Information Handling and Security Policy</i> which has been supplied to the Keeper.</p> <p>This is version 1.0 approved by the Senior Management Team and published in September 2015.</p> <p>The <i>Security Policy</i> is supported by the Board's <i>Information Classification Procedure</i> which has also been supplied.</p> <p>A screen-shot has been supplied as evidence that the Board's staff have access to these documents on their intranet.</p> <p>The Keeper suggests that, when the <i>Information Handling and Security Policy</i> is reviewed (see element 13), consideration should be given to expanding the terms explained in 'Scope' (page 2). Information security should extend beyond records that contain 'personal information'. An organisation that collects valuable objects is likely to have records where safekeeping is vital (for example those involving confidential commercial arrangements or protection against theft). The <i>Information Handling and Security Policy</i></p> |

| | | | |
|---------------------------|-----------------|-----------------|---|
| | | | <p>mentions these under ‘Access’, but they seem to be omitted from ‘Scope’ which too closely maps that of a Data Protection Policy.</p> <p>The Keeper agrees that the Board have an approved and operational information security policy as required by the Act.</p> |
| <p>9. Data Protection</p> | <p>G</p> | <p>G</p> | <p>It is a principle of the Board’s <i>Records Management Policy</i> (see element 3) that “Personal, sensitive and confidential information should be appropriately managed”.</p> <p>To this end the Board has a <i>Data Protection Policy</i> which has been supplied to the Keeper.</p> <p>This is version 1.0 approved by the Senior Management Team and published in June 2015.</p> <p>A screen-shot has been supplied as evidence that the Board’s staff have access to this document on their intranet.</p> <p>The Data Protection Policy is supported by an on-line policy statement at: https://www.nationalgalleries.org/aboutus/policy-statements/article/data-protection-policy and by a privacy statement at: https://www.nationalgalleries.org/aboutus/policy-statements/article/online-privacy-and-publication-statement</p> <p>The Board is registered with the Information Commissioner: Z8156178.</p> <p>The eight (current) principles of data protection are explained in the <i>Data Protection Policy</i>.</p> |

| | | | |
|--|-----------------|-----------------|---|
| | | | <p>Subject access request guidance is available to the public at https://www.nationalgalleries.org/aboutus/policy-statements/article/data-protection-policy</p> <p>The Keeper agrees that the Board of Trustees for the National Galleries of Scotland have properly considered their responsibilities under the Data Protection Act 1998.</p> |
| <p>10. Business Continuity and Vital Records</p> | <p>G</p> | <p>G</p> | <p>The Board has a <i>Business Continuity Plan</i>.</p> <p>Because of the sensitive nature of the information contained in this document only the control sheet and an introductory page has been submitted to the Keeper.</p> <p>The Keeper accepts redaction of sensitive documents, but wishes to remind the Board that all submissions in the PRSA process are held by the National Records of Scotland confidentially, with access only permitted for the Keeper, the Head of Government Records and the PRSA assessment team. No part of a submission will be published without the express consent of the submitting authority.</p> <p>The Control sheet shows the <i>Business Continuity Plan</i> to be that approved by the Senior Management Team and published in May 2015.</p> <p>Business areas are required to submit a <i>Critical Function Form</i> centrally to inform continuity procedures. A sample form has been provided to the Keeper and he agrees that it appropriately details vital records and is evidence that the recovery of records is considered in the business continuity structure.</p> <p>The Board have also submitted their <i>IT Back-Up Process</i> which shows electronic records are protected for continuity purposes (see also element 6).</p> <p>The Keeper agrees that the Board have business continuity arrangements that</p> |

| | | | |
|-----------------|----------|----------|---|
| | | | consider the recovery of records. |
| 11. Audit trail | G | G | <p>The Board have submitted the <i>Records Management Advisor Job Description</i>, which make clear that Mr Connor (see element 2) has responsibility for “Preparing a records management plan for NGS in line with the requirements of the Public Records (Scotland) Act 2011 for approval by the Keeper of the Records of Scotland” and “Helping to create and support a culture of effective and efficient records management practice across the organisation.”</p> <p>Mr Connor has a post-graduate diploma in archives and records management.</p> <p>The <i>Letter of Endorsement</i> and the text of the <i>Plan</i> make it clear that the Records Management Advisor role will be taken over by the Head of Performance and Planning in the future. The Board has provided the Keeper with this officer’s job description. It makes clear that the Head of Performance and Planning already has considerable responsibility for records management in the organisation and has been working with the Records Management Advisor “in the development of the Records Management Plan”.</p> <p>The <i>Plan</i> states (page 6) that NGS “is committed to providing access to appropriate learning and development opportunities to all staff”. To this end, the Board have created a records management training module which has been shared with the Keeper.</p> <p>This is version 1.1 published in November 2015.</p> <p>The training module mentions the Act and features links to key documents. It explains the purposes of robust records management, procedures for records creation (see element 11) and a quiz. The Keeper thanks the Board for sharing this training with him.</p> |

| | | | |
|--|-----------------|-----------------|--|
| | | | <p>A screen-shot has been supplied as evidence that the Board’s staff have access to this training via their intranet.</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 Board consider information governance training for staff as required.</p> |
| <p>12. Competency Framework for records management staff</p> | <p>G</p> | <p>G</p> | <p>The Board have submitted the <i>Records Management Advisor Job Description</i>, which make clear that Mr Connor (see element 2) has responsibility for “Preparing a records management plan for NGS in line with the requirements of the Public Records (Scotland) Act 2011 for approval by the Keeper of the Records of Scotland” and “Helping to create and support a culture of effective and efficient records management practice across the organisation.”</p> <p>Mr Connor has a post-graduate diploma in archives and records management.</p> <p>The <i>Letter of Endorsement</i> and the text of the <i>Plan</i> make it clear that the Records Management Advisor role will be taken over by the Head of Performance and Planning in the future. The Board has provided the Keeper with this officer’s job description. It makes clear that the Head of Performance and Planning already has considerable responsibility for records management in the organisation and has been working with the Records Management Advisor “in the development of the Records Management Plan”.</p> <p>The <i>Plan</i> states (page 6) that NGS “is committed to providing access to appropriate learning and development opportunities to all staff”. To this end, the Board have created a records management training module which has been shared with the Keeper.</p> |

| | | | |
|--|-----------------|-----------------|---|
| | | | <p>This is version 1.1 published in November 2015.</p> <p>The training module mentions the Act and features links to key documents. It explains the purposes of robust records management, procedures for records creation (see element 11) and a quiz. The Keeper thanks the Board for sharing this training with him.</p> <p>A screen-shot has been supplied as evidence that the Board’s staff have access to this training via their intranet.</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 Board consider information governance training for staff as required.</p> |
| <p>13. Assessment and Review</p> | <p>G</p> | <p>G</p> | <p>The Act requires a scheduled public authority to “keep its records management plan under review” (part 1 5.1 (a)).</p> <p>As a response to this clause, the Board’s <i>Plan</i> states (page 7) “The Records Management Advisor, with the approval of the Head of Performance & Planning, has developed a review schedule that sets out times for the assessments and what they will include.” This <i>Review Schedule</i> has been provided to the Keeper.</p> <p>This is version 1.0 approved by the Senior Management Team and published in February 2016.</p> <p>The <i>Review Schedule</i> details timescales for review, responsibility for review, reporting structure and methodology.</p> |

| | | | |
|--|--|--|--|
| | | | <p>The <i>Review Schedule</i> makes allowance for the introduction of additional staff training if required. The Keeper commends the potential for future training (and the resources this might require) in a document that has been formally approved by Senior Management.</p> <p>The <i>Business Continuity Plan</i> is due for review by May 2017.</p> <p>The <i>Data Protection Policy</i> (see element 9) is due for review by June 2017.</p> <p>The <i>Policy</i> (see element 3), the <i>Document Naming & Version Control Guidance</i> document (see element 11), the <i>Information Handling and Security Policy</i> (see element 8), the <i>Scanning Guidance</i> document, the <i>Email Guidance</i> document, the <i>Information Classification Procedure</i> document and the <i>Records Disposal Policy</i> (see element 6) are due for review by September 2017.</p> <p>The <i>Iron Mountain Records Store Procedure</i> document is due for review by October 2017.</p> <p>The <i>Disclosure Handling Policy</i> and the <i>Records Management Learning Module</i> are due for review by November 2017.</p> <p>The <i>Retention Schedule Guidance</i> document (see element 5) is due for review by December 2017.</p> <p>The <i>Review Schedule</i> (see element 13) and the <i>Records Retention Schedule</i> (see element 5) are due for review by February 2018.</p> <p>The Board's registration with the Information Commissioner must be renewed by February 2017.</p> |
|--|--|--|--|

| | | | |
|------------------------|------------|------------|--|
| | | | The Keeper agrees that the Board have processes in place to review their <i>Plan</i> as required by the Act and have determined a time when this will take place. The responsibility for undertaking the review and the review reporting procedure are also clearly laid out. Furthermore the Keeper acknowledges that appropriate review dates have been allocated to key evidential documents. |
| 14. Shared Information | N/A | N/A | The Board does not routinely share information with third parties when carrying out its functions. |

**Board of Trustees for the National Galleries of Scotland
(for simplicity referred to as ‘the Board’ in the assessment below)**

General Notes on RMP, Including Concerns:

Version:

This assessment is on the *Records Management Plan* (the *Plan*) of the Board of Trustees for the National Galleries of Scotland as at 1st March 2016.

The *Plan* is accompanied by a *Letter of Endorsement* from Sir John Leighton, Director General of the National Galleries, dated 22 February 2016 (**see element 1**).

The *Plan* refers to the Public Records (Scotland) Act and follows the 14 element structure of the Keeper’s Model Plan <http://www.nrscotland.gov.uk/record-keeping/public-records-scotland-act-2011/resources/model-records-management-plan>

It is to be expected that the *Plan* which promotes robust records management provision would support the ‘Key Aim’ of the authority:

“3. To be a sustainable and efficient organisation” – see *Corporate Plan 2014-18* at:
https://www.nationalgalleries.org/media/_file/about_us/corporate-plan-2015-18-summary.pdf

Records Management Working Group

In June 2015 the Senior Management Team agreed the formation of a short-life working group to progress the *Records Management Plan* with appropriate representation from across NGS. This is the Records Management Working Group chaired by Mr Connor (**see element 2**).

The Records Management Working Group was responsible for agreeing the *Records Retention Schedule* (**see elements 4 and 5**) the core structural document of the Board’s records management provision.

It is clear that this group is fundamentally important to records management provision in the authority and the Keeper thanks the Board for sharing information about their role with him.

Third Parties

The scope of the Act includes third parties carrying out the functions of public authorities such as the Board. The Board state in the *Plan* that “NGS does not currently contract out any of its core functions” (page 7).

6. Keeper's Summary

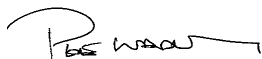
Elements 1 -14 that the Keeper considers should be in a public authority records management plan have been properly considered by the Board of Trustees for the National Galleries of Scotland. Policies and governance structures are in place to implement the actions required by the plan.

7. Keeper's Determination

Based on the assessment process detailed above, the Keeper **agrees** the RMP of the **Board of Trustees for the National Galleries of Scotland**.

- The Keeper recommends that the Board of Trustees for the National Galleries of 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 the Board of Trustees for the National Galleries of Scotland .In agreeing this RMP, the Keeper expects the Board of Trustees for the National Galleries of Scotland to fully implement the agreed RMP and meet its obligations under the Act.



.....
Tim Ellis
Keeper of the Records of Scotland