

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

**Board of Trustees of the National Museums of Scotland**

**The Keeper of the Records of Scotland**

**16<sup>th</sup> February 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 the Board of Trustees of the National Museums of Scotland by the Public Records (Scotland) Act 2011 Assessment Team following its submission to the Keeper on 14<sup>th</sup> June 2017.

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

## 3. Authority Background

National Museums Scotland is a public body. The Board of Trustees is National Museums Scotland's governing body and the Board is accountable to Scottish Ministers and the Scottish Parliament. The Board is responsible for setting the National Museums Scotland's vision, strategy and policy and for monitoring progress to achieve these. The Museums' Director has overall responsibility for implementing the agreed strategic priorities and actions of the Board. The principle aim of National Museum's Scotland is to preserve, interpret and make accessible for all, the past and present of Scotland, other nations and cultures, and the natural world.

The Director and Executive Team make up the top management tier of National Museums Scotland.

<https://www.nms.ac.uk/about-us/>

## 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 of the National Museums of 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

**Board of Trustees of the National Museums of Scotland**  
(for simplicity this authority is referred to as ‘The Board’ in the assessment below)

Element	Present	Evidence	Notes
1. Senior Officer <i>Compulsory element</i>	<b>G</b>	<b>G</b>	<p>The Board of Trustees of the National Museums of Scotland (the Board) have identified Keith Pentland, Director of Finance and Planning, as the individual with overall responsibility for records management in the authority.</p> <p>The Director of Finance and Planning is the authority’s SIRO.</p> <p>As SIRO, Mr Pentland is responsible for data protection in the authority (<b>see element 9</b>).</p> <p>The Director of Finance and Planning is the ‘owner’ of the <i>Records Management Policy</i>.</p> <p>The Keeper agrees that The Board of Trustees of the National Museums of Scotland have identified an appropriate individual to this role as required by the Public Records (Scotland) Act 2011 (the Act).</p>
2. Records	<b>G</b>	<b>G</b>	The Board have identified Dawn Lindsay, Information & Knowledge Manager, as the

<p>Manager <i>Compulsory element</i></p>			<p>individual with day-to-day responsibility for implementing the <i>Records Management Plan</i> (the <i>Plan</i>).</p> <p>The Board have provided Ms. Lindsay’s <i>Job Description</i> which shows that she has a formal objective to “Develop, coordinate and be responsible for policies and procedures for the management of corporate information and knowledge, incorporating legislative requirements into our policy and practice.”</p> <p>Ms. Lindsay is the author of the <i>Plan</i>, the <i>Transferring and Retrieving Electronic Records</i> document, the <i>Transferring and Retrieving Paper Records</i> document (<b>see element 4</b>), the <i>Guidelines for handling personal information under the Data Protection Act 1998</i> (<b>see element 9</b>), the <i>Procedure for the Disposal of Records</i> document (<b>see element 6</b>) the <i>Records &amp; Information Management Information for New Staff</i> (<b>see element 12</b>) and the <i>Records Management Policy</i> (<b>see element 3</b>).</p> <p>Ms. Lindsay is co-author of the <i>Transferring Records to the National Museums Scotland Institutional archive</i> document (<b>see element 7</b>).</p> <p>Ms. Lindsay recently revised the Board’s <i>Managing Information on the National Museums Scotland Network</i> guidance document.</p> <p>Ms. Lindsay is responsible for monitoring the retention schedule (<b>see element 5</b>), destruction processes (<b>see element 6</b>) and (jointly) the <i>Information Security Policy</i> (<b>see element 8</b>).</p> <p>Ms. Lindsay is “...operationally responsible for providing guidance and advice on data protection issues...” This is confirmed in the <i>Data Protection Policy</i> (section 12) (<b>see element 9</b>).</p> <p>Ms. Lindsay is the ‘owner and manager’ of the Board’s <i>Information Asset Register</i></p>
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			<p><b>(see element 8).</b></p> <p>Ms. Lindsay is responsible for reviewing key policy documents such as the <i>Records Management Policy</i>. She is also listed in that <i>Policy</i> as the principle point of contact for "...any record management queries within National Museums Scotland."</p> <p>The Information &amp; Knowledge Manager also holds the role of Data Protection Co-ordinator.</p> <p>All the above indicates to the Keeper that Ms. Lindsay has a detailed knowledge of the records management provision in the authority.</p> <p>Ms. Lindsay reports directly to Mr. Pentland <b>(see element 1)</b>.</p> <p>The Keeper agrees that The Board of Trustees of the National Museums of Scotland have identified an appropriate individual to this role as required by the Public Records (Scotland) Act 2011.</p>
<p>3. Policy <i>Compulsory element</i></p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>The Board have a <i>Records Management Policy</i> which has been submitted to the Keeper in evidence. This is version 5.1 dated Jul 2016 approved at Executive Team/Directorate level.</p> <p>The <i>Policy</i> references the <i>Plan</i> and the Keeper agrees that the <i>Plan</i> supports the objectives laid out in the <i>Policy</i>.</p> <p>The Board have provided screen-shots of their intranet showing that staff can access information governance documents and training including the <i>Policy</i>.</p> <p>The Keeper notes the Board have included the following improvement in the action plan (<i>Plan</i> appendix 2): "Revision of Records Management policy as part of ICT</p>

			<p>Action Plan, to ensure it is aligned with other policies comprising Information Security Management System (ISMS).” This is confirmed in the <i>Plan</i> under element 8 Information Security. <b>He requests that he is updated when this action has been completed.</b></p> <p>The <i>Policy</i> mentions the Act and the Data Protection Act 1998 (<b>see element 9</b>).</p> <p>The Keeper agrees that The Board of Trustees of the National Museums of Scotland have a records management policy statement as required by the Act.</p>
<p>4. Business Classification</p>	<p><b>A</b></p>	<p><b>G</b></p>	<p>The Board explain that: “National Museums Scotland does not have a formal Business Classification Scheme. This is currently under development in tandem with the organisation-wide review of retention schedules.” (<i>Plan</i> page 7).</p> <p>It is proposed that the Business Classification Scheme will be based around function/activity/task. The Keeper confirms that this level of detail is likely to be suitable. It must remain a business decision for the Board, but the Keeper has acknowledged that a functional system, as proposed in the <i>Plan</i>, is currently considered best practice when developing a business classification.</p> <p>It is also proposed that “the organisational retention schedule and Business Classification Scheme will be one document.” (<i>Plan</i> page 10). This proposal is confirmed in the <i>Plan</i> under element 5. The Keeper agrees that the combination of <i>Business Classification Scheme</i> and <i>Retention Schedule</i> should lead to a stronger business tool.</p> <p>The <i>Covering Statement</i> from the Chief Executive (<b>see under General Comments below</b>) endorses improvement and states that “We recognise there is still work to do and as such our records management plan is forward looking, including an improvement plan and firm commitments to address gaps in our current practice.”</p>

			<p>The <i>Plan</i> states (page 12): “The implementation of a Business Classification Scheme will ensure less duplication, more effective information sharing, management and retention scheduling for our electronic records.” The Keeper agrees these are likely benefits of the proposed work.</p> <p>The Keeper acknowledges the Board have included the following improvement in the action plan (<i>Plan</i> appendix 2): “Create Business Classification Scheme in conjunction with revised Retention Schedules.” <b>He requests that he is updated when this action has been completed.</b></p> <p>The Board operate a hybrid system managing electronic and paper records. Electronic records are held on shared drives and line-of-business systems and paper records are held both in a records store (semi-current) and in offices.</p> <p>The Keeper has been provided with the Board’s <i>Transferring and Retrieving Electronic Records</i> guidance document (version 1.2 April 2017) and their <i>Transferring and Retrieving Paper Records</i> staff guidance document (version 1.3 also April 2017).</p> <p>The <i>Transferring and Retrieving Paper Records</i> guidance document gives a detailed explanation of the operation of the Board’s semi-current records store. It also supports the procedures for the destruction of paper records (<b>see element 6</b>).</p> <p><b>The Keeper agrees this element of The Board of Trustees of the National Museums of Scotland’s <i>Records Management Plan</i> under ‘improvement model’ terms. This means that the authority has identified a gap in provision (in this case that the formal business classification scheme is still under development), but the Keeper is confident that they have put processes in place to close that gap. The Keeper’s agreement is dependent on his being</b></p>
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			<p>updated as the project progresses. He acknowledges that the Board have committed to do this.</p>
<p>5. Retention schedule</p>	<p><b>G</b></p>	<p><b>G</b></p>	<p><b>See also element 4</b></p> <p>The Board have submitted their retention schedule, which is being revised 2017/18. This review will coincide with the development of the authority's <i>Business Classification Scheme</i> as explained in element 4 above. However, the Keeper acknowledges that the authority has a current operational retention schedule. <b>He requires to be updated to any changes when the review is completed.</b> To this end, he notes the Board have included the following improvement in the action plan (<i>Plan</i> appendix 2): "Complete the revision of all retention schedules. Full master retention schedule to be forwarded to the Keeper as part of evidence submission." The <i>Plan</i> notes (page 18) that the revised <i>Retention Schedule</i> will include the identification of vital records. The Keeper welcomes this inclusion.</p> <p>The maintenance of a retention schedule is a requirement of the Board's <i>Records Management Policy (see element 3)</i> section 5.</p> <p>The <i>Procedure for the disposal of records</i> guidance document instructs staff: "Records which have been identified as having long term or historical value or which require to be kept permanently will be housed in the Institutional Archive, this should be recorded on a Retention Schedule." (<b>see element 7</b>).</p> <p>The Board have provided screen-shots of their intranet showing that staff can access information governance documents and training.</p> <p>The Keeper agrees that other evidential documents such as the <i>Transferring and Retrieving Paper Records (see element 4)</i> support the allocation of retention decisions.</p>

			<p>The Board state in their <i>Plan</i> (page 13): “We aim to revise our retention schedules over the coming year to ensure they are comprehensive, and identify material to be permanently preserved. We are also working to improve our management of electronic records and ensure we put safeguards in place for this material so it is accessible in the years to come.” The Keeper agrees this as appropriate.</p> <p>The Keeper agrees that the Board of Trustees of the National Museums of Scotland have an operational <i>Retention Schedule</i> which is available to staff.</p>
<p>6. Destruction Arrangements <i>Compulsory element</i></p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>The Board commit to “Placing controls around creation, management and <u>destruction</u> of records where appropriate” and to “Retaining only the records we need to retain, destroying routinely records that have passed their retention period.” (<i>Records Management Policy – see element 3 - section 5</i>).</p> <p>They also state: “The retention of unnecessary paper and electronic records impacts on staff time, resources and both physical and electronic space. It can also incur liability to answer information requests made under the Data Protection Act 1998 and the Freedom of Information (Scotland) Act 2002, and in some instances for the Museum to be in breach of such legislation.” (<i>Procedure for the disposal of records guidance document – see below – Introduction</i>).</p> <p>With these statements in mind the Board have the following procedures in place:</p> <p><u>Paper (Internal)</u>: The <i>Plan</i> explains the procedure for identifying and approving hard-copy records for destruction. Physical secure destruction is carried out by a third-party contractor. Evidence of this arrangement has been provided.</p> <p><u>Paper (External)</u>: The Board have confirmed that they do not hold public records with a third-party storage contractor.</p>

			<p><u>Electronic:</u> Staff guidance in the destruction of records held electronically at the end of their retention period is given in the <i>Procedure for the disposal of records</i> guidance document.</p> <p><u>Hardware:</u> The secure deletion of records from redundant hardware is carried out by a third-party contractor. As evidence the Board have provided a copy of their agreement with the contractor and an sample receipt detailing work undertaken.</p> <p><u>Back-Ups:</u> The Board, quite properly, keep back-up copies for business continuity purposes (<b>see element 10</b>). It is explained that these copies are kept ‘in association with the system owner and the Information &amp; Knowledge Management Team (<b>see under General Comments below</b>)’. The Keeper accepts that this means the IKM can be confident that back-up copies are deleted when appropriate. A copy of a current back-up schedule has been provided as evidence.</p> <p>The Board have provided their <i>Procedure for the disposal of records</i> guidance document which confirms and supports the procedures described above. This is version 1.1. The dissemination of guidance to staff regarding the secure destruction of records is a requirement of the Board’s <i>Records Management Policy</i> (<b>see element 3</b>) section 5.</p> <p>The <i>Procedure for the disposal of records</i> guidance makes it clear that the Board understand the importance of logging the destruction of records for future reference. The Keeper commends this.</p> <p>The destruction arrangements in the Board take account of the destruction of working copies. The Keeper welcomes this.</p> <p>The Keeper agrees that the Board of Trustees of the National Museums of Scotland</p>
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			<p>have processes 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><b>G</b></p>	<p><b>G</b></p>	<p>The National Museums of Scotland provides its own archive service, the 'Institutional Archive'.</p> <p>The <i>Records Management Policy</i> (<b>see element 3</b>) under "Introduction" states that the Library will "ensure our documentary heritage" and commit to "Transferring records of significant archival value to National Museums Scotland's archive collection." (<i>Policy</i> section 5).</p> <p>For the benefit of Museum staff, the Board have a <i>Transferring Records to the National Museums of Scotland Institutional archive</i> document which has been provided to the Keeper. This is the version 'Final 1.1'.</p> <p>Staff are provided with further guidance on archiving procedure (for example <i>Transferring and Retrieving Paper Records</i> under 'Management of your Records') and on the types of records that may be considered for permanent preservation (for example <i>Transferring and Retrieving Electronic Records</i> final page).</p> <p>The <i>Procedure for the disposal of records</i> guidance document instructs staff: "Records which have been identified as having long term or historical value or which require to be kept permanently will be housed in the Institutional Archive, this should be recorded on a Retention Schedule."</p> <p>The Keeper has seen transfer 'paperwork' in evidence that there is an established formal process for moving records from business systems to the Museum archive.</p> <p>The Keeper agrees that archive provision in the Library is suitable for the permanent</p>

			<p>preservation of records when appropriate.</p> <p>The Board state in their Plan (page 13): “We aim to revise our retention schedules over the coming year to ensure they are comprehensive, and identify material to be permanently preserved. We are also working to improve our management of electronic records and ensure we put safeguards in place for this material so it is accessible in the years to come.” The Keeper welcomes this principle.</p> <p>The Keeper agrees that the Board of Trustees of the National Museums of Scotland have arrangements in place to transfer records of historical significance to a suitable archive repository.</p>
<p>8. Information Security <i>Compulsory element</i></p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>The Board of Trustees of the National Museums of Scotland have an <i>Information Security Policy</i> which has been provided to the Keeper. This is the version approved in 2014.</p> <p>The <i>Information Security Policy</i> explains the procedure for reporting actual or potential security breaches. It covers hard-copy as well as electronic records.</p> <p>The adoption of an information security policy is a requirement of the Board’s <i>Records Management Policy (see element 3)</i> section 5 and <i>Data Protection Policy (see element 9)</i> section 8.</p> <p>The <i>Information Security Policy</i> is supported by a suite of supplementary policies (although some of these, such as, the <i>ICT Network and System Security Policy</i>, were ‘draft’ at the time of submission) and also by departmental security policies (sample provided). Policies in support and to help monitor the <i>Information Security Policy</i> are a requirement (<i>IS Policy</i> page 2).</p> <p>The Board have provided screen-shots of their intranet showing that staff can</p>

			<p>access information security documents and training.</p> <p>The Keeper notes the Board have included the following improvement in the action plan (<i>Plan</i> appendix 2): “Revision of Records Management policy as part of ICT Action Plan, to ensure it is aligned with other policies comprising Information Security Management System (ISMS)” <b>He requests that he is updated when this action has been completed.</b></p> <p>The <i>Plan</i> states (page 14): “We have an organisational Information Asset Register to identify our key business assets and also map where we hold personal data in the organisation.” – the existence of this Register is reconfirmed on page 17 and on page 18 of the <i>Plan</i>. The Keeper agrees that an information asset register is potentially a useful business tool. A sample page of the Information Asset Register has been provided as evidence.</p> <p>The Keeper agrees that the Board of Trustees of the National Museums of Scotland have processes in place to ensure the security of public records in their care.</p>
9. Data Protection	<b>G</b>	<b>G</b>	<p>The Board of Trustees of the National Museums of Scotland have an <i>Data Protection Policy</i> which has been provided to the Keeper. This is version A17.1 last revised in July 2016.</p> <p>The Board publishes public information relevant to data protection at <a href="https://www.nms.ac.uk/privacy-notice/">https://www.nms.ac.uk/privacy-notice/</a> The Keeper has seen a sample privacy notice.</p> <p>The Board (as National Museums Scotland) are registered with the Information Commissioner: Z159876X.</p> <p>The <i>Data Protection Policy</i> explains the (current) eight principles of data protection</p>

			<p>(Section 5).</p> <p>Subject access request information is available to the public: <a href="https://www.nms.ac.uk/about-us/contact-us/#subjectaccess">https://www.nms.ac.uk/about-us/contact-us/#subjectaccess</a> and to staff as section 5 of the <i>Data Protection Policy</i>.</p> <p>The Board have provided screen-shots of their intranet one of which shows that staff can access data protection information.</p> <p>The Board’s <i>Procedure for the disposal of records</i> guidance document (<b>see element 6</b>) specifically mentions the requirement to destroy records when no longer necessary (Data Protection Act principle 5).</p> <p>The <i>Data Protection Policy</i> includes a section on CCTV.</p> <p>The Keeper agrees that the <i>Data Protection Policy</i> supports the relevant commitments in the <i>Information Security Policy</i> (<b>see element 8</b>). For example <i>Data Protection Policy</i> section 8.</p> <p>Under ‘Future Developments’ the Board acknowledge the forthcoming adoption of the EU General Data protection Regulations and commit to revising their data protection response in line with these.</p> <p>The Keeper agrees that the Board of Trustees of the National Museums of Scotland have properly considered their responsibilities under the Data Protection Act 1998.</p>
10. Business Continuity and Vital Records	<b>G</b>	<b>G</b>	<p>The <i>Information Security Policy</i> (<b>see element 8</b>) requires the Board to have procedures in place that “ensure business continuity and service availability” (<i>Information Security Policy</i> – Purpose and Scope) and that “Business Continuity Plans will be produced” (The Policy).</p>

			<p>The <i>Plan</i> states that the National Museums of Scotland have a <i>Business Continuity Strategy</i> which has not been shared with the Keeper.</p> <p><b>The Keeper accepts that evidence has not been submitted regarding this element for security reasons. This situation is covered in his Guidance to the Model Plan: <a href="https://www.nrscotland.gov.uk/files//record-keeping/public-records-act/prsa-guidance-document.pdf">https://www.nrscotland.gov.uk/files//record-keeping/public-records-act/prsa-guidance-document.pdf</a></b></p> <p><b>The Keeper has received an e-mail from Fiona Stewart, Director of Estates and Facilities confirming that the Museums have robust business continuity arrangements and accepts this as evidence of the statements in the <i>Plan</i>.</b></p> <p>The Board keep back-up copies of electronic records for business continuity purposes. These are set up by the Information and Knowledge Management team <b>(see under General Comments below)</b>.</p> <p>The Board have provided screen-shots of their intranet showing that staff can access information governance documents and training. This includes access to business continuity arrangements.</p> <p>The identification of vital records is a requirement of the Board's <i>Records Management Policy (see element 3)</i> section 5. The <i>Plan</i> notes (page 18) that the revised <i>Retention Schedule (see element 5)</i> will include the identification of vital records. The Keeper welcomes this inclusion.</p> <p>The Keeper agrees that the Board of Trustees of the National Museums of Scotland has processes in place to recover records in an emergency. Furthermore he can agree that the Board have properly considered the identification of records vital to the pursuit of the authority's functions.</p>
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11. Audit trail	<b>A</b>	<b>G</b>	<p>The <i>Records Management Policy</i> (<b>see element 3</b>) under Section 5 states that the Board will ensure that “Records can be easily accessed and retrieved”. The <i>Transferring and Retrieving Electronic Records</i> (<b>see element 4</b>) states: “Records and information are a valuable resource for National Museums Scotland. This resource can be easily wasted if we are unable to access the records.”</p> <p>The Board does not operate an EDRM. Electronic records are managed in shared drives or line-of-business systems.</p> <p>Electronic records held in shared drives are not automatically tracked and staff must do this manually. The Board have provided the Keeper with a copy of their <i>Managing Information on NMS Network</i> and <i>Transferring and Retrieving Electronic Records</i> staff guidance documents. The <i>Managing Information on NMS Network</i> document shows that higher level folders are set centrally and populated locally: “The top level folders are standardised and preset for departments - departmental Information Monitors manage the folder structure and files in their department’s folders underneath this level.” (<i>Managing Information</i> page 2). The Keeper agrees this is an appropriate structure.</p> <p><b>However, the Board has identified improvements that could be made in the tracking of records held on shared drives. The <i>Plan</i> states (page 21): “We will work to improve the audit trail for electronic records. The implementation of the Business Classification System will promote the use of a single filing system, reduce duplication and improve the integrity and security of records across the organisation.” The Keeper acknowledges this work is a formal project in the improvement actions appended to the <i>Plan</i>. He agrees this action.</b></p>

			<p>The Keeper agrees that any line-of-business systems used by the Board may impose suitable naming convention/version control at time of record-creation to adequately track records subsequently.</p> <p>The Board also manages records in paper format, in offices and in a central records store. The Board operate a database recording accessions and retransmissions from their corporate records store. A sample page from the Records Store Database has been provided as evidence.</p> <p>Paper records are transferred to the corporate archive (<b>see element 7</b>) using a records transfer form. A sample of this form has been provided to the Keeper.</p> <p>The <i>Covering Statement</i> from the Chief Executive (<b>see under General Comments below</b>) endorses “We recognise there is still work to do and as such our records management plan is forward looking, including an improvement plan and firm commitments to address gaps in our current practice.”</p> <p><b>The Keeper can agree this element under ‘improvement model’ terms. This means that the Board has identified a gap in provision (audit trail for electronic records needs improvement) and has put processes in place to close that gap. The Keeper is convinced of a commitment to pursue this objective, but will ask for annual updates as the project progresses.</b></p>
<p>12. Competency Framework for records management staff</p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>The Board have submitted the <i>Job Description of the Information and Knowledge Manager</i>. This makes it clear that Ms Lindsay has a responsibility to “Develop and maintain the Records Management plan and promote effective implementation across the organisation.”</p> <p>Ms. Lindsay has shared evidence of her membership of a leading professional society. The Keeper thanks her for including this.</p>

			<p>The Information and Knowledge Manager has a formal responsibility to: “Be responsible for the development of training programmes to support National Museums Scotland’s staff to effectively manage and share its information resources.” (<i>Job Description</i>).</p> <p>Data protection responsibilities (<b>see element 9</b>) are a feature of the Board’s <i>Staff Handbook</i>, supported by training and awareness sessions. The <i>Data Protection Policy</i> is featured in the staff induction checklist (shared with the Keeper in evidence).</p> <p>New staff are provided with information security policies on entry and must sign to agree they have understood and will comply with their clauses. The <i>Plan</i> states (page 14) that the Board intend to improve their practice in training and awareness of information security. Appropriate training is a requirement of the <i>Information Security Policy (IS Policy page 2)</i>. <b>The Keeper would be interested to know more about this when the <i>Plan</i> is reviewed.</b></p> <p>The Board have shared their <i>Records &amp; Information Management Induction Pack</i> with the Keeper. He acknowledges this includes a comprehensive set of information governance guidance, such as sections on “Email Management Top 10” and Data Protection.</p> <p>The Board have provided screen-shots of their intranet showing that staff can access information governance documents and training.</p> <p>The Keeper agrees that the individual identified at element 2 has the relevant skills and authority to implement the Board’s records management plan. Furthermore, he agrees that the Board properly considers information governance training for staff where appropriate.</p>
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<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)).</p> <p>The Foreword to the <i>Plan</i> from Director Dr Rintoul commits the Board to such a review.</p> <p>The Plan (page 24) makes it clear that the Information &amp; Knowledge Manager (<b>see element 2</b>) is responsible for reviewing the implementation of the Plan.</p> <p>Progress against Improvement actions included in the <i>Plan</i> will be assessed monthly. Once they are complete, the Information &amp; Knowledge Manager will carry out a self-assessment analysis based on the JISC Records and Information Maturity Model (<a href="https://www.jisc.ac.uk/guides/records-management/maturity-model">https://www.jisc.ac.uk/guides/records-management/maturity-model</a>).</p> <p>Monitoring of progress against the self-assessment will be undertaken on a regular basis and results will be reported to the Director of Finance &amp; Planning (<b>see element 1</b>) for presentation to the Executive Team.</p> <p>The Keeper acknowledges that documents supplied in evidence have review dates allocated:</p> <p>The <i>Records Management Policy</i> (<b>see element 3</b>) is due for review by July 2018.</p> <p>The <i>Transferring and Retrieving Electronic Records</i> document and the <i>Procedure for the Disposal of Records</i> document (<b>see element 6</b>) are due for review by April 2019.</p> <p>The authority’s registration with the Information Commissioner is currently due to be renewed by 5th January 2018.</p>
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			<p>The Keeper notes the Board have included the following improvement in the action plan (<i>Plan</i> appendix 2): “Regular progress updates with respect to the Improvement Actions will be provided to the Keeper as required.” He welcomes this commitment.</p> <p>The Keeper agrees that Board of Trustees of the National Museums of Scotland have arrangements in place to keep their Records Management Plan under review as required by the Act.</p>
14. Shared Information	<b>N/A</b>	<b>N/A</b>	<p>The Board of Trustees of the National Museums of Scotland state: “National Museums Scotland does not routinely share personal, sensitive or confidential information with third parties as part of its function.” (<i>Plan</i> page 25)</p>

**Board of Trustees of the National Museums of Scotland**  
(for simplicity this authority is referred to as ‘The Board’ in the assessment below)

**General Notes on RMP, Including Concerns:**

This assessment is on the *Records Management Plan* (the *Plan*) of the Board of Trustees of the National Museums of Scotland. The version assessed is 1.1 approved by the National Museums Scotland Executive Team on 9<sup>th</sup> June 2017. The author of the *Plan* is Dawn Lindsay, Information & Knowledge Manager (**see element 2**). The *Plan* features an endorsing foreword by Dr Gordon Rintoul, Director in which he confirms the Board’s intention to keep the Plan under review (**see element 13**). The *Plan* includes a list of improvement actions as Appendix 2.

The Board acknowledges records as a business asset (for example *Plan* Foreword and page 14, *Information Security Policy* ‘Purpose and scope’ or *Records Management Policy* introduction). The Keeper commends this recognition.

The *Plan* includes the following statement: “The Keeper of the Records of Scotland will be alerted to any changes that are made to this Records Management Plan in accordance with section 5(6) of the Public Records (Scotland) Act 2011.” The Keeper welcomes this commitment.

The Keeper agrees that improvements in records management provision will help the Board meet the aspirations of their Strategic Plan (such as the ‘priority’ of: Valuing, supporting and developing our people and empowering them to work together in new ways.): <https://www.nms.ac.uk/about-us/our-organisation/strategic-plan/>

The *Plan* mentions the Public Records (Scotland) Act 2011 (the Act) and 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>

### 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)).

Part of our Facilities Management function is carried out by contractors. This contract is managed by the Scottish Government on behalf of National Museums Scotland. They have attached an extract from the contract document which sets out the agreement re: Records Management.

### Information and Knowledge Management Team (IKM)

The IKM team is made up of the Information & Knowledge Manager and Information & Knowledge Management Assistant (part-time).

The IKM manage the contents of the records store (**see element 4**) and arranges for re-transmission to business areas as required.

The IKM is specifically listed as point of contact for queries regarding the secure destruction of records (*Procedure for the disposal of records* guidance document) explicitly in the area of the permanent destruction of electronic records (**see element 6**) or the transfer to archive storage (**see element 7**).

The IKM liaises with paper record document-owners as the end of the retention period approaches to initialise the destruction process (**see element 6**).

The IKM also discuss the retention of back-up tapes with the 'system owner' and therefore can control the destruction of back-ups (**see element 6**). Transfers of records from offices to the Records Store must be arranged through the IKM. They will manage the transfer and log the records into the system.

Access to the corporate archive, the electronic archive and the semi-current records store is restricted by the IKM.

The Board has also appointed Information Monitors, a group of champions who undertake information management tasks within their departments who are supported by the IKM. They have quarterly meetings and provide information and guidance for the group on the intranet. The Board has provided the current *Roles and Responsibilities* document.

This group is clearly of fundamental importance to records management in the authority and the Keeper thanks the Board for including information about their work in the submission.

## 6. Keeper's Summary

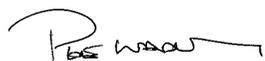
Elements 1 - 14 that the Keeper considers should be in a public authority records management plan have been properly considered by the Board of Trustees of the National Museums of Scotland. Policies and governance structures are in place to implement the actions required by the plan.

## 7. Keeper's Determination

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

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



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