

**Public Records (Scotland) Act 2011**

**Cairngorms National Park Authority**

**The Keeper of the Records of Scotland**

**24<sup>th</sup> August 2017**

**Contents**

1. Public Records (Scotland) Act 2011 .....2  
3. Authority Background .....4  
4. Keeper’s Assessment Process .....5  
5. Model Plan Elements: Checklist .....6  
6. Keeper’s Summary .....24  
7. Keeper’s Determination .....24  
8. Keeper’s Endorsement.....25

**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 Cairngorms National Park Authority by the Public Records (Scotland) Act 2011 Assessment Team following its submission to the Keeper on 10<sup>th</sup> February 2017.

The assessment considered whether the RMP of Cairngorms National Park Authority 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 Cairngorms National Park Authority complies with the Act can be found under section 7 of this report with relevant recommendations.

## 3. Authority Background

The Cairngorms National Park was established in September 2003 and the Cairngorms National Park Authority (CNPA) became fully operational – taking on all its statutory powers – on 1 September 2003.

The CNPA is designed to be an enabling organisation, promoting partnership working and giving leadership to all those involved in the Cairngorms. The Park Authority does not duplicate work of other organisations, such as the enterprise agencies or Scottish Natural Heritage, but is here to ensure there is a joined-up approach to projects and initiatives that help to meet the four aims of the Park. The authority's Communications & Engagement Strategy (published online) sets out how they will achieve this. With a staff of 67, plus 19 board members, the Park Authority has several statutory duties including managing outdoor access in the Park, planning and development management, the production of a Local Development Plan and the publication of a National Park Partnership Plan (both also online).

<http://cairngorms.co.uk/authority/>

## 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 Cairngorms National Park Authority'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.
----------	--	--	----------	--	--	----------	--

## 5. Model Plan Elements: Checklist

### Cairngorms National Park Authority [CNPA]

Element	Present	Evidence	Notes
1. Senior Officer <i>Compulsory element</i>	<b>G</b>	<b>G</b>	<p>Cairngorms National Park Authority (CNPA) have identified David Cameron, Director of Corporate Services, as the individual with overall responsibility for records management in the authority.</p> <p>This is confirmed by a <i>Covering Letter</i> from Mr Cameron dated 30<sup>th</sup> January 2017 and by the <i>Records Management Policy Statement (see element 3)</i> section 7.</p> <p>Mr Cameron authorised the <i>Records Management Policy Statement</i>, the <i>Archiving &amp; Transfer Arrangements Policy (see element 7)</i>, the <i>Information Security Policy (see element 8)</i>, and the <i>Statement on Information Sharing (see element 14)</i>.</p> <p>Mr Cameron is the authority’s Senior Accountable Officer and is a member of the Senior Management Team reporting to the Board.</p> <p>The Head of Corporate Services and the Governance and Corporate Performance Manager (<b>see element 2</b>) are ultimately responsible for Information Security Management within CNPA (<b>see element 8</b>).</p> <p>The Keeper agrees that Cairngorms National Park Authority have identified a suitable 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>Cairngorms National Park Authority (CNPA) have identified Helen Rees , Governance and Corporate Performance Manager as the individual with day-to-day responsibility for implementing the <i>Plan</i>.</p> <p>This is confirmed by a <i>Covering Letter</i> from Mr Cameron dated 30<sup>th</sup> January 2017 and by the <i>Records Management Policy Statement (see element 3)</i> section 7.</p> <p>Mrs Rees is also referred to as ‘records manager’ in the Plan and evidential documents. The <i>Records Management Policy Statement</i> section 7 makes it clear that the Governance Manager and the Records Manager are the same person.</p> <p>Mrs Rees’ competencies have been provided to the Keeper. These show that she: “Takes ownership of records management issues within CNPA and ensures their successful resolution” and “Has a good knowledge of other organisations records management systems and experiences” <b>(see element 12)</b>. Mrs Rees is responsible for providing advice on any corporate records management issue (<i>Naming Conventions and Version Control Guidance</i> section 4).</p> <p>Mrs Rees ‘prepared’ the <i>Records Management Policy Statement (see element 3)</i>, the <i>Archiving &amp; Transfer Arrangements Policy (see element 7)</i>, the <i>Information Security Policy (see element 8)</i>, the <i>Business Continuity Plan (see element 10)</i> and the <i>Statement on Information Sharing (see element 14)</i>.</p> <p>The Records Manager also acts as Information Officer for CNPA.</p> <p>The above would suggest that Mrs Rees has a detailed knowledge of the records management provision in the authority.</p> <p>Mrs Rees reports directly to the Director of Corporate Services <b>(see element 1)</b>.</p>
---	-----------------	-----------------	---

			<p>The Head of Corporate Services (<b>see element 1</b>) and the Governance and Corporate Performance Manager are ultimately responsible for Information Security Management within CNPA (<b>see element 8</b>).</p> <p>The Keeper agrees that Cairngorms National Park Authority have identified a suitable individual to this role as required by the Act.</p>
3. Policy Compulsory element	<b>G</b>	<b>G</b>	<p>The Cairngorms National Park Authority have a <i>Records Management Policy Statement</i> which has been provided to the Keeper. This is version 1.1 approved by David Cameron (<b>see element 1</b>) in April 2016.</p> <p>The Keeper agrees that the <i>Plan</i> supports the objectives of the <i>Records Management Policy Statement</i> (<b>see under individual elements below</b>).</p> <p>CNPA have provided the Keeper with a screen-shot of the staff shared drive showing access to information governance policies and training.</p> <p>The <i>Records Management Policy Statement</i> specifically mentions the Public Records (Scotland) Act 2011 and the Data Protection Act 1998 (<b>see element 9</b>).</p> <p>CNPA intend to use this policy to raise records management provision in the authority to ISO15489 standard.</p> <p>The Keeper agrees that Cairngorms National Park Authority have a records management policy statement as required by the Act.</p>
4. Business Classification	<b>G</b>	<b>G</b>	<p>CNPA's <i>Records Management Policy Statement</i> (<b>see element 3</b>) identifies good records management is reliant on "the capture of records (received or created) in</p>



			<p>record keeping systems”.</p> <p>With this in mind the authority has created a structured file plan (<i>Business Classification Scheme</i>), which they have shared with the Keeper.</p> <p>The Business Classification Scheme details function/activity/transaction (type) which is adequate for compliance under the Act, but extends to retention decision and identification of ‘vital’ records (<b>see element 10</b>).</p> <p>As sample entry might be: Board &amp; Committee Papers &amp; Minutes - Confidential - Final - Permanent</p> <p>Maintenance of the <i>Business Classification Scheme</i> and development of an <i>Information Asset Register</i> is the responsibility of the Records Management Working Group (<b>see under General Comments below</b>).</p> <p>CNPA operate a hybrid system with paper records held in-house and with a third party commercial storage supplier and electronic records on corporate shared drives. The <i>Records Management Policy Statement</i> states (Appendix A) “The strategy for creating records will be ‘digital by default’ with paper copies only being created where legally necessary and for the archiving of ‘permanent’ records”.</p> <p>CNPA are currently conducting an information asset audit (see The <i>Records Management Policy Statement</i> Appendix A) as part of a project to expand the Business Classification Scheme to take in further information such as information asset owner and metadata. This would create an <i>Information Asset Register</i> for the authority and is to be commended. <b>The Keeper requests that he is updated as this project progresses. He notes that much of this work will be carried out over the next year.</b></p>
--	--	--	--

			<p>An Information Asset Register would be a robust response to the objectives in section 5 of the <i>Information Security Policy</i>:</p> <ul style="list-style-type: none"> <li>• Information Assets e.g. Databases, documents etc. will be identified and managed within the Records Management policy;</li> <li>• All ICT assets will be clearly identified and included in a central inventory (Asset Log)</li> <li>• All assets will have an identified “owner” either Head of Service or IT Team (for central systems)</li> </ul> <p>The Keeper agrees that Cairngorms National Park Authority has a business classification scheme, including retention decisions, that appropriately reflects the functions of the authority.</p>
5. Retention schedule	<b>G</b>	<b>G</b>	<p>CNPA’s <i>Records Management Policy Statement (see element 3)</i> identifies good records management is reliant on “the controlled retention of information.”</p> <p>The Cairngorms National Park Authority have submitted their <i>Retention Schedule</i> to the Keeper.</p> <p>This spreadsheet is used to inform the creation of the Business Classification Scheme (<b>see element 4</b>) and is based on the ‘SCARRS’ model created by the Scottish Council on Archives and endorsed by the Keeper.</p> <p>The <i>Plan</i> states that the Retention Schedule is available to staff (<i>Plan</i> page 5). CNPA have provided the Keeper with a screen-shot of the staff shared drive showing access to the Retention Schedule.</p> <p>Retention decisions were arrived at with input from the relevant business areas. The Keeper commends local involvement in this process as likely to ensure more robust</p>

			<p>buy-in. Heads of service are responsible for approving changes to amendments to retention decisions for records in their area (see <i>Records Management Policy Statement</i> section 7).</p> <p>The combination of the <i>Business Classification/File Plan</i> and <i>Retention Schedule</i> into a single 'Information Asset Register' document is likely to create a stronger business tool for the authority and is to be welcomed.</p> <p>The creation of retention schedule is a requirement of the CNPA <i>Records Management Policy Statement</i> section 2 and Appendix A.</p> <p>The Keeper agrees that Cairngorms National Park Authority has an approved and operational retention schedule that covers the expected record types created by a national park authority.</p>
<p>6. Destruction Arrangements <i>Compulsory element</i></p>	<p><b>A</b></p>	<p><b>G</b></p>	<p>Cairngorms National Park Authority note in their <i>Records Management Policy Statement</i> (section 1) (<b>see element 3</b>) that records should be disposed of “safely at the right time” and that good records management is reliant on “the controlled destruction of information.” The Data Protection Policy (<b>see element 9</b>) commits the authority to the disposal of personal data “in a way that protects the rights and privacy of data subjects (e.g., shredding, disposal as confidential waste, secure electronic deletion).”</p> <p>With these objectives in mind, CNPA have the following processes in place to ensure the secure and irretrievable destruction of records when appropriate:</p> <p><u>Paper (Internal):</u> <b>The Plan states that: “CNPA has a filing room of paper records which needs to be audited and records either: destroyed, retained, or moved to Iron Mountain. There will be a project planned to tackle this over the course of 2017.”</b> The Keeper agrees this action and agrees this part of the</p>

			<p><b>element under ‘improvement model’ terms.</b></p> <p><u>Paper (External)</u>: CNPA hold records with a third party document storage company. Arrangements are in place for controlled destruction of records in this store. A copy of a contract between CNPA and the storage organisation has been supplied to the Keeper as evidence that these arrangements are operational.</p> <p><u>Electronic</u>: <b>The <i>Plan</i> states that: “CNPA recognises that it has no easy mechanism in place to determine which electronic records have been destroyed and the IT Manager has been tasked with identifying solutions to provide an audit trail for electronic records.” The controlled and systematic deletion of records held on shared drives is a particular area of difficulty for many public authorities and the Keeper welcomes the acknowledgement of this. He agrees that the suggested improvements the Authority is considering are a reasonable response to these difficulties. Therefore, the Keeper is able to accept these statements as grounds for agreeing this element under improvement model terms.</b></p> <p><u>Hardware</u>: The <i>Information Security Policy</i> (<b>see element 8</b>) states at section 9: “all items containing storage media shall be checked to ensure that any sensitive data and licensed software has been removed or securely overwritten prior to disposal and the CNPA uses a third party facility to destroy IT equipment”. This is supported by the <i>Data Protection Policy</i> section 10. The Keeper agrees this is a suitable procedure in principle. Destruction certificates have been supplied as evidence that these arrangements are in operation.</p> <p><u>Back-Ups</u>: CNPA, quite properly, keeps back-ups of electronic records for business continuity purposes (<b>see element 10</b>). The <i>Plan</i> (page 7) explains that this back-up is maintained by another Scottish public authority. On the subject of the destruction of back-up copies, they make the following statement: “There is no way to separate</p>
--	--	--	--

			<p>out data to destroy it according to retention schedules once the data is on tape. We have balanced the need to keep data for restoration in case of accidental deletion with the need to comply with the PSRA. We have decided that in future we will keep a rolling 12 months of back up tapes for this purpose, which fits in with our 12 monthly audit schedules.”</p> <p><b>The Keeper agrees this element of CNPA’s records management plan under ‘improvement model’ terms. This means that the Authority has identified gaps in their records management provision (destruction of paper records held internally and electronic records held on shared drives) and has put processes in place to close those gaps. The Keeper’s agreement would be conditional on his being updated as this project progresses.</b></p>
<p>7. Archiving and Transfer <i>Compulsory element</i></p>	<p><b>G</b></p>	<p><b>A</b></p>	<p>CNPA have identified the National Records of Scotland (NRS) as the appropriate repository for records identified as suitable for permanent preservation.</p> <p>A Memorandum of Understanding regarding the transfer of records from CNPA to NRS is being negotiated at the time of this assessment. This is confirmed by the NRS Client Management Team.</p> <p><b>The Keeper agrees this element of CNPA’s <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 the 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</p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>The Cairngorms National Park Authority have a <i>Information Security Policy</i> which has been provided to the Keeper. This is version 1.1 approved by David Cameron</p>

<p><i>Compulsory element</i></p>			<p><b>(see element 1)</b> in October 2016.</p> <p>This policy supports the CNPA’s <i>Records Management Policy Statement (see element 3)</i> where it identifies good records management leading to “information being better protected and securely stored.” (section 2).</p> <p>CNPA have provided the Keeper with a screen-shot of the staff shared drive showing access to information governance policies and training.</p> <p>The <i>Information Security Policy</i> commits CNPA to ensure that information security is included in project plans and contracts. The Keeper commends this inclusion.</p> <p>Arrangements for the physical security of paper records and servers are covered in the <i>Information Security Policy</i> (section 7). This is supported by the CNPA <i>Records Management Policy Statement</i> Appendix A.</p> <p>Arrangements for reporting information security incidents are explained in the <i>Information Security Policy</i> (section 22).</p> <p>The <i>Information Security Policy</i> specifically mentions the Data Protection Act 1998 <b>(see element 9)</b>.</p> <p>The text of the <i>Information Security Policy</i> (section 4) suggests that the policy is supported by a suite of other guidance documents such as clear desk/clear screen guidelines, e-mail use policy etc. These are not mentioned in the <i>Plan</i>. Samples of these guidance documents have been provided to the Keeper.</p> <p>The Keeper agrees that Cairngorms National Park Authority have information security arrangements as required by the Act.</p>
----------------------------------	--	--	--

<p>9. Data Protection</p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>The Cairngorms National Park Authority have a <i>Data Protection Policy</i> which has been provided to the Keeper. This is version 2 August 2017.</p> <p>CNPA have provided the Keeper with a screen-shot of the staff shared drive showing access to information governance policies and training.</p> <p>CNPA have provided the Keeper with a screen-shot of the staff shared drive showing access to information governance policies and training.</p> <p>The <i>Data Protection Policy</i> explains the process for making subject access requests (section 5). It is included in the CNPA Publication Scheme.</p> <p>CNPA are registered as data controllers with the Information Commissioner: Z7988605</p> <p>The <i>Data Protection Policy</i> explains the (current) eight principles of data protection.</p> <p>The <i>Data Protection Policy</i> features a section on information security (<b>see element 8</b>).</p> <p>The Keeper notes the intention to identify CNPA corporate lawyer as Data Protection Officer under GDPR when it comes in to force.</p> <p>The Keeper agrees that Cairngorms National Park Authority properly considered their responsibilities under the Data Protection Act 1998.</p>
<p>10. Business Continuity</p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>The Cairngorms National Park Authority operate a <i>Business Continuity Plan</i> which, in redacted form, has been provided to the Keeper. This is the version approved by</p>

<p>and Vital Records</p>			<p>the Management Team in December 2014. The Keeper agrees that the redaction of this document is appropriate.</p> <p>The Keeper agrees that the <i>Business Continuity Plan</i> considers the recovery of records in an emergency.</p> <p>Staff are issued with paper copies of the <i>Business Continuity Plan</i> which they are required to retain at their home in case of emergency. The Keeper commends this practice.</p> <p>Appendix B of the <i>Business Continuity Plan</i> is a list of vital records which is mirrored in the <i>Business Classification Scheme</i> and will form part of the proposed <i>Information Asset Register (see elements 4 and 5)</i>. The Keeper welcomes this inclusion.</p> <p>Having business continuity plans in place is a requirement of the <i>Information Security Policy</i> section 21” Business Continuity plans, procedures and facilities shall be in place for all of the CNPA’s critical systems. All backup, business continuity and disaster recovery systems will be reviewed and tested on an annual basis and after each significant change or upgrade.” <b>(see element 8)</b>.</p> <p>The identification of vital records is a requirement of the CNPA <i>Records Management Policy Statement</i> section 2 and Appendix A.</p> <p>The Keeper agrees that Cairngorms National Park Authority consider recovery of records as part of their business continuity procedures.</p>
<p>11. Audit trail</p>	<p><b>A</b></p>	<p><b>G</b></p>	<p>The Cairngorms National Park Authority’s <i>Records Management Policy Statement (see element 3)</i> states that efficient records management should lead to “records being easily and efficiently located, accessed and retrieved” (<i>Policy Statement</i> section 2).</p>



			<p>With this objective in mind, CNPA have the following procedures in place to track records and identify versions:</p> <p><b><u>Paper (internal):</u></b> The <i>Plan</i> suggests that CNPA do not have a robust methodology for tracking paper files in and out of the internal secure filing room (such as a file registry). They state “CNPA recognises the need to provide consistent audit trails for both paper and electronic records. CNPA plans to produce a comprehensive information asset list of both electronic and paper records and to include on that list, when records are destroyed.” (<i>Plan</i> page 8). The Keeper agrees that the audit of information asset (see element 4) will greatly assist in this. This action is confirmed in The <i>Records Management Policy Statement</i> (Appendix A).</p> <p><u>Paper (external):</u> A formal procedure for tracking records in and out of the CNPA third party storage facility is established and explained in the <i>Plan</i>.</p> <p><u>Electronic:</u> The Keeper agrees that certain line of business systems operated by the Authority will have document tracking functionality built-in.</p> <p>However, CNPA principally holds public records on shared drives. In order to effectively track records held on shared drives it is important that record creators follow established naming conventions and version control principles. To this end CNPA have created a <i>Naming Conventions and Version Control Guidance</i> document which has been provided to the Keeper. The Keeper agrees that this is detailed guidance that would be suitable for controlling record naming and therefore record tracking in the authority. The creation of version control standards document is a requirement of the CNPA <i>Records Management Policy Statement</i> section 2.</p> <p>CNPA have provided the Keeper with a screen-shot of the staff shared drive</p>
--	--	--	--

			<p>showing access to information governance policies and training.</p> <p>The Keeper notes that CNPA is considering the automation of tracking for electronic records. <b>This is to be commended and the Keeper requests he is informed if this step is taken.</b></p> <p>CNPA acknowledge in the <i>Naming Conventions and Version Control Guidance</i> document that “All documents within CNPA, whether electronic or hard copy, need to be uniquely identifiable” and that naming conventions “will help to distinguish similar records from one another at a glance, and by doing so will facilitate the storage and retrieval of records, which will enable users to browse file names more effectively and efficiently. “ The Keeper agrees these principles.</p> <p><b>If the Keeper is able to agree this element of Cairngorms National Park Authority’s <i>Records Management Plan</i> under improvement model terms. This means that the authority has identified a gap in their records management provision (in this case that tracking paper records held internally is problematic) and have put processes in place to close that gap. The Keeper’s agreement would be conditional on being updated 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>Cairngorms National Park Authority have included Helen Rees’ formal responsibilities as part of the <i>Plan</i> (page 3). This shows that she is responsible for designing and delivering “ensuring the records management plans are implemented” and “providing appropriate training to staff.” The <i>Records Management Policy Statement</i> confirms that the Governance Manager is responsible for: “creating, maintaining and implementing records management standards, development of the Records Management Plan procedures and guidance.”</p> <p>They have also submitted the <i>Records Management Competencies Framework</i></p>

			<p><b>(see element 2)</b> for Mrs Rees. These show that she has the relevant skills to undertake these responsibilities.</p> <p>CNPA commit to training staff in information governance procedure: “We will ensure that all staff receive appropriate records management training.” <i>Records Management Policy Statement</i> section 1 <b>(see element 3)</b>.</p> <p>All new staff received training in records management, data protection, information handling and information security at induction. <b>The Keeper would be interested in any training material that could be shared.</b></p> <p>CNPA offer training in use of the <i>Naming Conventions and Version Control Guidance</i> document (see <i>Records Management Policy Statement Appendix A</i>).</p> <p>Managers are responsible for ensuring their staff are appropriately trained (see <i>Records Management Policy Statement</i> section 7). The ICT Team will provide training material on IT security (see <i>Information Security Policy</i> section 4).</p> <p>The Keeper agrees that the individual identified at Element 2 has the authority and skills required to implement the <i>Plan</i> and that training is provided for staff.</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)).</p> <p>The review of the implementation of the <i>Plan</i> will be pursued quarterly by the Records Management Working Group <b>(see under General Comments below)</b> a formal annual review will be carried out annually by the Authority’s Internal Audit. The Keeper commends the principle of involving a public authority’s internal audit mechanism on the review of the effectiveness of a records management plan.</p>

			<p>CNPA have provided a diagram showing the reporting lines of the Records Management Working Group and a statement to the Records Management Team instructing them on audit procedures.</p> <p>Policies submitted in evidence for example the <i>Records Management Policy Statement (see element 3)</i> and <i>Information Security Policy (see element 8)</i> have an annual review commitment detailed on their control sheets. The annual review of information governance policies is also the responsibility of the Records Management Working Group.</p> <p>CNPA make the following commitment in their <i>Records Management Policy Statement (Appendix A)</i>: “Going forward, CNPA will undertake a once yearly audit of both electronic and paper files to ensure compliance with records management best practise guidelines.” The Keeper welcomes this commitment.</p> <p>As noted in element 10 above, business continuity procedures should be tested annually.</p> <p>The authority’s registration with the Information Commissioner is currently due to be renewed by 16 June 2018. The Keeper accepts that this may change under GDPR coming into force May 2018.</p> <p>The Keeper agrees that CNPA have a process in place to review the implementation of the <i>Plan</i> as required by the Act and that the authority have made it clear the timescale, responsibility and methodology of this process.</p>
14. Shared Information	<b>G</b>	<b>G</b>	<p>CNPA routinely share information with another Scottish public authority and have provided the Keeper with the <i>Data Sharing Policy</i> and a template <i>Data Sharing Agreement</i> to show the issues considered at the outset of a formal data sharing arrangement with the authority.</p>

			<p>The <i>Policy</i> commits CNPA as follows: “CNPA takes great care when sharing information. CNPA follows the published guidance from HMG, Cabinet Office, endorses the principles of the International Security Standard ISO 27001, and adheres to the Information Commissioner’s Office (ICO) Data Sharing Code of Practice.” Clauses in the <i>Data Sharing Template</i> support these aims.</p> <p>Security of access for contractor is considered in the <i>Information Security Policy</i> (<b>see element 8</b>) sections 13 and 18.</p> <p>The Keeper agrees that Cairngorms National Park Authority have considered the records management implications of information sharing as is appropriate.</p>
--	--	--	--

## Cairngorms National Park Authority [CNPA]

### General Notes on RMP, Including Concerns:

Version: This assessment is on the *Records Management Plan* (the *Plan*) of Cairngorms National Park Authority (CNPA) submitted to the Keeper of the Records of Scotland in February 2017.

The *Plan* is accompanied by a letter from David Cameron, Director of Corporate Services, dated 30<sup>th</sup> January 2017 in which he confirms that he is “entirely supportive of the RMP adopted by the CNPA”.

The *Plan* is approved by Grant Moir, Chief Executive Officer of CNPA.

CNPA acknowledge records as a business asset (for example *Plan* Introduction, *Records Management Policy Statement* section 1 or *Information Security Policy* section 1.1). The Keeper commends this recognition.

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>.

The Keeper agrees that the Plan represents a contribution to the Scottish Government National Outcomes (as published in the *Cairngorms National Park Partnership Plan 2012-2017*) "Our public services are high quality, continually improving, efficient and responsive to local people's needs."

<http://cairngorms.co.uk/working-partnership/national-park-partnership-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)).

The Records Management Policy Statement (see element 3) states at 4 that the scope of the Policy would include "CNPA (both permanent and temporary), contractors, consultants, and secondees who have access to records ...". The Information Security Policy (see element 8) also refers to contractors (section 3) as does the Data Protection Policy (section 2) (see element 9).

CNPA make clear in the Records Management Policy Statement that : "This policy and the associated guidance and procedures must be adhered to by all third parties, contractors, volunteers and not for profit organisations performing a function or providing services on behalf of the CNPA and the CNPA will look to incorporate references to this statement within any contracts with such third parties."

The Keeper welcomes this acknowledgement and that contractual clauses would be an appropriate method of imposing records management standards on contractors.

Records Management Working Group:

Records Management Working Group members include staff from designated Directorates within the Park Authority and is chaired by our Governance Manager, Helen Rees (**see element 2**). The Director of Corporate Services (**see element 1**) attends.

The Working Group is set up to assist with promoting and coordinating records management practices throughout the CNPA. They are also responsible for assisting with the development of the Records Retention Schedule, Business Classification Framework and implementing and managing local file plans.

The Working Group is responsible for monitoring the effectiveness of information governance policies (see for example *Information Security Policy* section 23 or *Naming Conventions and Version Control Guidance* section 5.)

Through the Director of Corporate Services the group can report to the Board.

The ICT Team has input to the Records Management Working Group regarding security of information systems.

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

## 6. Keeper's Summary

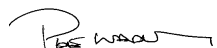
Elements 1 - 14 that the Keeper considers should be in a public authority records management plan have been properly considered by Cairngorms National Park Authority. Policies and governance structures are in place to implement the actions required by the plan.

## 7. Keeper's Determination

Based on the assessment process detailed above, the Keeper **agrees** the RMP of **Cairngorms National Park Authority**.

- The Keeper recommends that Cairngorms National Park Authority 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**

.....  
**Robert Fotheringham**



Public Records Officer

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 **Cairngorms National Park Authority**. In agreeing this RMP, the Keeper expects Cairngorms National Park Authority to fully implement the agreed RMP and meet its obligations under the Act.



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