

Public Records (Scotland) Act 2011

**Caledonian Maritime Assets Ltd (registered number SC001854)
Assessment Report**

The Keeper of the Records of Scotland

2nd June 2016

Contents

1. Public Records (Scotland) Act 2011 3
2. Executive Summary 4
3. Authority Background 4
4. Assessment Process 5
5. Model Plan Elements: Checklist 6
6. Keeper's Summary22
7. Keeper's Determination22
8. Keeper's Endorsement23

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 **Caledonian Maritime Assets Ltd** by the Public Records (Scotland) Act 2011 Assessment Team following its submission to the Keeper on **15th December 2015**.

The assessment considered whether the RMP of Caledonian Maritime Assets Ltd 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 Caledonian Maritime Assets Ltd complies with the Act can be found under section 7 of this report with relevant recommendations.

3. Authority Background

Caledonian Maritime Assets Limited owns the ferries, ports and harbours and infrastructure necessary for ferry services serving the West coast of Scotland and the Clyde Estuary.

They are wholly owned by the Scottish Government with Scottish Ministers the sole shareholders. The Caledonian Maritime Assets Limited Board have an executive management team and supporting staff at headquarters in Port Glasgow.

<http://www.cmassets.co.uk/en/home.html>

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 Caledonian Maritime Assets Ltd.’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:

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

**Caledonian Maritime Assets Ltd (registered number SC001854)
(For simplicity described as CMAL in the assessment below)**

N.B. in the assessment below the term ‘staff’ should be taken to include Board Members.

Element	Present	Evidence	Notes
1. Senior Officer <i>Compulsory element</i>	G	G	<p>CMAL have identified Kevin Hobbs, Chief Executive Officer, as the individual responsible for records management in the authority.</p> <p>This is confirmed by the Records Management Policy (see element 3).</p> <p>Mr Hobbs has approved the <i>Records Management Plan</i>.</p> <p>The Keeper agrees that CMAL have identified an appropriate individual to this role as required by the Act.</p>
2. Records Manager <i>Compulsory element</i>	G	G	<p>CMAL have identified Susan Williams, Business Support Manager, as the individual responsible for the day-to-day implementation of the <i>Plan</i>.</p> <p>This is confirmed by the <i>Plan</i> itself (page 9) and by the Business Support Manager’s job description which has been supplied to the Keeper. It states that this</p>

			<p>post is “Information Officer responsible for information management including Data Protection, Freedom of Information and Records Management and implementing policy and procedure within the organisation to ensure compliancy with relevant legislation”.</p> <p>This is confirmed by the Records Management Policy (see element 3).</p> <p>The terms ‘Office Manager’, ‘Records Manager’ and ‘Business Support Manager’ are used interchangeably in the <i>Plan</i>. This is explained in an accompanying e-mail and accepted by the Keeper. All three post refer to Ms. Williams.</p> <p>The Plan is ‘owned’ by Ms. Williams.</p> <p>The Office Manager is responsible for reviewing the <i>Records Management Policy (Plan section 3.3.1)</i> and “for ensuring that records management practices and procedures are established in line with all legal obligations and professional standards.” (<i>Policy 7.2</i>). The Office Manager also has responsibility for secure destruction of employee files (<i>Data Protection Policy</i>).</p> <p>The Office Manager reports to the Chief Executive (see element 1) on records management issues.</p> <p>The Keeper agrees that Caledonian Maritime Assets Ltd have identified an appropriate individual to this role as required by the Act.</p>
<p>3. Policy Compulsory element</p>	<p>G</p>	<p>G</p>	<p>CMAL have a <i>Records Management Policy</i> that has been supplied to the Keeper as appendix A to <i>the Records Management Plan</i>.</p> <p>The Policy states at 3.1 that it is to “act as a mandate for the support and delivery of records management policies, procedures and initiatives across the organisation.”</p>

			<p>The Keeper agrees the <i>Records Management Plan</i> supports the objectives of the <i>Policy</i>.</p> <p>The <i>Policy</i> states: “CMAL’s vision is to ensure accurate and reliable information is readily available to support service delivery; where employees understand the importance of managing information and records, and where stakeholder, operators and the public have confidence that information is created, held and disposed of securely.” The Keeper commends this objective.</p> <p>The <i>Policy</i> also includes a good introduction to the benefits of robust records management (sections 4 and 5), identifies records as a business asset (section 2.3 and 5.1) and mentions the Public Records (Scotland) Act (section 2.1). The Keeper welcomes the inclusion of these details.</p> <p>The <i>Policy</i> will be reviewed in conjunction with the <i>Plan</i> (see element 13).</p> <p>A screen-shot has been provided as evidence that CMAL staff have access to this policy on their intranet.</p> <p>The Keeper agrees that CMAL has an approved records management policy as required by the Act.</p>
<p>4. Business Classification</p>	<p>A</p>	<p>G</p>	<p>CMAL have a <i>Business Classification Scheme</i> that has been developed over the last year. The Business Classification Scheme has been provided to the Keeper and appears to cover the expected activities of the authority.</p> <p>Now that it is complete, the <i>Business Classification Scheme</i> will be used to inform the roll-out of the authorities EDM project See <u>BCS/ERMS</u> under General Comments below.</p>

			<p>Furthermore CMAL intend to create an Information Asset Register (IAR) following the structure of the Classification Scheme. A sample page has been sent to the Keeper as evidence of how the IAR will appear when complete. The Keeper requests that the IAR is provided when available.</p> <p>The Keeper agrees this element of CMAL’s records management plan under ‘improvement model’ conditions. This means that the authority has identified a gap in provision (the electronic records management solution is not fully rolled-out to staff) and have taken steps towards closing the gap. Specifically, the Keeper acknowledges that CMAL have created a business classification scheme that properly matches the expected functions of the authority. This will be at the core of the development of a records management system for the organisation. The Keeper acknowledges that he has received a letter from the Chief Executive of CMAL (see element 1) committing the authority to implementing the improvements explained in the <i>Action Plan</i> (see High Level Project Plan under General Comments below). The Keeper’s agreement is conditional on his being updated as the project progresses (see also elements 5 and 11).</p>
<p>5. Retention schedule</p>	<p>A</p>	<p>G</p>	<p>CMAL have provided the Keeper with their current retention schedule. However, the <i>Plan</i> notes “The CMAL retention schedule is currently being revised to incorporate relevant legal requirements and accepted best practice. Once revised and on completion of SharePoint development, the system will allow document owners to apply retention periods to all records, information and any other unstructured data held within the system.” (<i>Plan</i> page 12). The Keeper agrees that this is an important step to be take during the roll-out of the SharePoint solution being adopted by the authority See <u>BCS/ERMS</u> under General Comments below.</p> <p>The review of the <i>Retention Schedule</i> is a stated objective in the Records Management Policy (section 6.2) (see element 3).</p>

			<p>The Keeper agrees this element of CMAL’s <i>Plan</i> on an ‘improvement model’ basis. This means that the authority has identified a gap in provision (the retention schedule is under review) and the Keeper acknowledges that they are implementing processes to close that gap. The Keeper’s agreement is conditional on his being alerted when the review of the retention schedule is complete and on his being provided with a copy of the new version as soon as practicable.</p>
<p>6. Destruction Arrangements <i>Compulsory element</i></p>	<p>A</p>	<p>G</p>	<p>A review of destruction procedures is a stated objective in the Records Management Policy (section 6.2) (see element 3).</p> <p>Currently CMAL have the following arrangements in place:</p> <p><u>Paper</u>: CMAL have a contract with a third-party shredding company for the secure destruction of hard copy records. A copy of a contract has been supplied as evidence that these arrangements are in place (appendix C).</p> <p><u>Hardware</u>: CMAL have a contract with a third-party hardware destruction company. A copy of an invoice from this company, showing the destruction of IT equipment, has been provided as evidence that these arrangements are operational.</p> <p><u>Electronic</u>: CMAL is in the process of developing corporate procedures for the destruction of electronic records (<i>High Level Project Plan</i> section 6). The target date for this document was December 2015, but it is now clear that roll-out will coincide with the completion of the SharePoint project See <u>BCS/ERMS</u> under General Comments below. The Keeper will require a copy of this to be submitted when available.</p> <p>The risks associated with semi-irretrievable destruction of e-mails are suggested in the <i>Information Security Guidelines</i> (see element 8).</p>

			<p><u>Back-ups</u>: CMAL take a back-up of electronic records for business continuity purposes. This is done by a third party. The back-up procedure, including overwriting of records, is explained in a statement from the third party which has been supplied to the Keeper as appendix D.</p> <p>Under “Planned Development Work” (<i>Plan</i> 3.3.6) CMAL state their objective of: “keeping a register of the records that have been destroyed and by which method”. The Keeper commends this principle.</p> <p>The Keeper can agree this element of CMAL’s Records Management Plan on ‘improvement model’ terms. This means that he acknowledges that CMAL have identified a gap in their records management provision (An authority-wide system for the destruction of electronic records is lacking), and have put processes in place to close that gap. The Keeper’s agreement will be conditional on receiving updates as the project progresses.</p>
<p>7. Archiving and Transfer <i>Compulsory element</i></p>	<p>G</p>	<p>G</p>	<p>The introduction to the <i>Plan</i> refers to records being ‘transferred to NRS’ (section 2 page 6) and ‘protected for historical and other research’ (section 3 page 7). This is in line with an identification in the <i>Records Management Policy</i> (see element 3) that CMAL should keep records “to protect and make available the corporate memory of the organisation” (<i>Policy</i> 4.3).</p> <p>To promote this objective CMAL have identified the National Records of Scotland (NRS) as a suitable repository for those records selected for permanent preservation. The development of “detailed archive transfer arrangements” is a stated objective in the <i>Records Management Policy</i> (section 6.2)</p> <p>The Keeper is content that this transfer arrangement is now in place and a Memorandum of Understanding between NRS and CMAL is on file.</p>

			<p>The Keeper agrees that CMAL have identified a proper repository for the permanent retention of historically significant records and that transfer arrangements are in place as required by the Act.</p>
<p>8. Information Security <i>Compulsory element</i></p>	<p>G</p>	<p>G</p>	<p>CMAL have an <i>Information Security Guidelines</i> document, which has been provided to the Keeper as appendix G. This details information security around electronic systems.</p> <p>Staff are required to acknowledge that they have read the <i>Guidelines</i> by way of a signature on a ‘coverage form’. Without this signature IT usage is suspended. The Keeper commends this policy.</p> <p>Security of records held in hard-copy is explained in the <i>Records Management Plan</i> (section 3.3.8).</p> <p>CMAL staff are provided with information security as part of their induction and in the <i>Staff Handbook</i> (appendix F). This includes password protection on computer systems and physical security of hard-copy records in offices. Guidance on record security in “out-of-office” situations is in preparation. This is confirmed by the <i>Plan</i> (section 3.3.8) and by the <i>High Level Project Plan</i> (section 8). The Keeper requests that he is sent a copy of this when available.</p> <p>The <i>Guidelines</i> feature instructions regarding procedures when staff leave the organisation.</p> <p>There is a statement in the <i>Plan</i> (section 3.3.7) that records held on removable media are copies with a ‘master’ retained on the server.</p> <p>As part of the development of a new records management system (See <u>BCS/ERMS</u></p>

			<p>under General Comments below) CMAL intend to adopt a protective marking system for records. The review and consolidation of information security procedures is a stated objective in the Records Management Policy (section 6.2) (see element 3). If this work results in a new <i>Information Security Policy</i> document, please forward a copy to the Keeper.</p> <p>The Keeper agrees that CMAL have arrangements in place to ensure security of their records, as required by the Act, and have properly communicated these arrangements to staff.</p>
<p>9. Data Protection</p>	<p>G</p>	<p>G</p>	<p>CMAL has a <i>Data Protection Policy</i> which has been provided to the Keeper as appendix H. This is version 01 dated 18th February 2014. The Keeper acknowledges that this is a particularly detailed policy document matching what is currently considered best practice.</p> <p>There is a privacy policy at http://www.cmassets.co.uk/en/privacy-policy.html.</p> <p>The <i>Data Protection Policy</i> lists the 8 principles of data protection and includes a section of subject access requests.</p> <p>CMAL are registered with the Information Commissioner: Z9019502</p> <p>As with the <i>Information Security Guidelines</i> (see element 8), staff have to acknowledge they are familiar with the <i>Data Protection Policy</i> by signature.</p> <p>The <i>Records Management Policy</i> (see element 3) specifically mentions compliance with the Data Protection Act 1998. Data Protection form a separate section of the <i>Information Security Guidelines</i> (see element 8).</p> <p>The Keeper agrees that CMAL have properly considered their responsibilities under</p>

			the Data Protection Act 1998.
10. Business Continuity and Vital Records	A	G	<p>The <i>Plan</i> states (section 3.3.10): “CMAL does not currently have a business continuity plan although has prioritised its development”. This is confirmed by the <i>High Level Project Plan</i> (section 8) with a target date of May 2016. The development of a <i>Business Continuity Plan</i> is a stated objective in the Records Management Policy (section 6.2) (see element 3). The Keeper requires a copy when available. He will be particularly keen to see that the <i>Continuity Plan</i> includes the recovery of records.</p> <p>It is planned that the SharePoint development (See <u>BCS/ERMS</u> under General Comments below) will include the identification of vital records as part of the classification. The Keeper commends this principle.</p> <p>The Keeper agrees this element of CMAL’s <i>Records Management Plan</i> under ‘improvement model’ terms. This means that the authority has identified a gap in its records management provision (they will not have an approved <i>Business Continuity Plan</i> until later in the year) but have put processes in place to close that gap. The Keeper’s agreement will be conditional on receiving updates as the project progresses.</p>
11. Audit trail	A	G	<p>CMAL’s <i>Records Management Policy</i> (see element 3) identifies that effective records management ensures that all information received or created is stored appropriately and is easily retrievable (<i>Policy 2.2 and 5.2</i>).</p> <p>CMAL is therefore committed to improving the way in which documents are managed throughout the organisation. The improvement of audit trail mechanisms is a stated objective in the <i>Records Management Policy</i> (section 6.2) (see element 3).</p>

			<p>To assist this they are expanding the functionality of the SharePoint 2013 system they already operate (See <u>BCS/ERMS</u> under General Comments below) to provide a records management solution.</p> <p>The <i>Plan</i> (section 3.3.6) indicates that business areas will be responsible for tracking local file movement, once the core business classification structure is in place.</p> <p>The Keeper agrees that the proposed SharePoint development should greatly improve the record tracking provision in CMAL.</p> <p>The <i>Plan</i> (section 3.3.11) also commits CMAL to run a gap analysis on audit trail to ensure continuity of tracking between hard-copy and electronic records. The Keeper commends this principle.</p> <p>The Keeper agrees this element of CMAL’s <i>Records Management Plan</i> under ‘improvement model’ terms. This means that CMAL have identified a gap in records management provision (there is no business-wide system for tracking records) and have put processes in place to close that gap. The Keeper’s agreement will be conditional on receiving updates as the SharePoint project progresses.</p>
<p>12. Competency Framework for records management staff</p>	<p>G</p>	<p>G</p>	<p>CMAL have noted that, as a small organisation, the individual identified at element 2 is not a full-time records manager. The Keeper accepts this as reasonable.</p> <p>The <i>Records Management Policy</i> (see element 3) commits CMAL to develop formal competencies for “staff with operational responsibility for records management” (<i>Policy</i> section 11.1).</p> <p>The Job Description for the Business Support Manager has been provided to the</p>

			<p>Keeper. This shows that the individual identified at element 2 has the appropriate responsibility to implement the <i>Plan</i>.</p> <p>Staff training in records management has been arranged and the Keeper has been provided with details of the proposed Workshop Session. He agrees that this seems an appropriate vehicle for promoting records management in the authority.</p> <p>The Keeper welcomes a commitment from CMAL that they will develop information governance training (<i>Plan</i> section 3.3.12, <i>Policy</i> section 11.1 and <i>High Level Project Plan</i> section 12). There is a target date of 2016 for this project.</p> <p>CMAL have committed to include data protection training as part of a planned information governance training package (<i>Plan</i> section 3.3.9).</p> <p>The Keeper agrees that CMAL have ensured that the individual identified at element 2 has the appropriate authority and resource at their disposal to implement the <i>Plan</i>. Furthermore, agrees that the authority has considered records management training for other appropriate staff.</p>
<p>13. Assessment and Review</p>	<p>G</p>	<p>G</p>	<p>The Public Records Act 2011 requires scheduled public authorities to “keep its records management plan under review” (part 1 5.1 (a)).</p> <p>The introduction to the <i>Records Management Plan</i> commits CMAL to an annual review (sections 3.2 and 3.3.13). A more thorough review will be carried out every three years. The completion of a self-assessment follow-up by the Records Management Working Group (see <u>Records Management Champions under General Comments below</u>) is a stated objective in the <i>Records Management Policy</i> (section 6.2) (see element 3). This assessment will focus on the early stages of the implementation of the <i>Plan</i> The Keeper commends this commitment.</p>

			<p>CMAL have stated that, on completion of the initial project plan, the Business Support Manager will use the on-line self-assessment tool provided by the Scottish Council on Archives (ARMS) to identify continuing development work. The Business Support Manager, will also be responsible for reporting the findings to the Board and Senior Management Team as well as sending findings to the Keeper.</p> <p>CMAL state that there is an internal audit plan and discussions have started with the company contracted to provide internal audit services to include an audit of the Records Management Plan in the internal audit plan for the end of 2016. The Keeper commends this idea and requests that he is informed as soon as these discussions are completed.</p> <p>Periodic review of the operation and fitness of the <i>Information Security Guidelines</i> document is a commitment at section 4.9 of the <i>Guidelines</i>.</p> <p>The <i>Plan</i> (section 3.3.11) commits CMAL to run a gap analysis on audit trail to ensure continuity of tracking between hard-copy and electronic records. The Keeper commends this principle.</p> <p>CMAL's registration with the Information Commissioner is due for renewal in March 2016.</p> <p>The Keeper agrees that CMAL have processes in place to review the Plan as required by the Act.</p>
14. Shared Information	A	G	<p>CMAL's <i>Records Management Plan</i> (section 3.3.14) states:</p> <p>"CMAL does not currently have a corporate procedure in place to govern the sharing, transfer and processing of corporate information, however each business area has specific procedures in place which they follow if asked to share information</p>

			<p>with another third party.”</p> <p>He notes there is a commitment under “Planned Development Work”: “Existing procedures will be reviewed and formalised through the implementation of a CMAL data sharing policy.”</p> <p>Although the Act does not require an authority to have one overarching procedure for all its business areas, the Keeper welcomes the commitment by CMAL to create such a document and requests that it is forwarded as soon as it is approved.</p> <p>The Keeper agrees this element of CMAL’s <i>Records Management Plan</i> under ‘improvement model’ terms. This means that he acknowledges that the authority have identified a gap in their records management provision (they consider a single data sharing agreement would be a strong business tool) and have put processes in place to close that gap. The Keeper’s agreement is conditional on him being provided with updates as the project progresses.</p>
--	--	--	--

Caledonian Maritime Assets Ltd (registered number SC001854) (For simplicity described as CMAL below)

Version

This assessment is on the *Records Management Plan* of Caledonian Maritime Assets Ltd submitted to the Keeper of the Records of Scotland for his agreement on 15th December 2015. It is version 1.2 created by Susan Williams (**see element 2**). It is based on the version approved by the signature of Tom Docherty, Chief Executive Officer, on 19th June 2015 (**see element 1**) and approved by the CMAL Board in August 2015.

The Plan identifies records as a business asset for CMAL and provides a good introduction to the value of robust records management (section 2).

The *Plan* is accompanied by an *High Level Project Plan* (**see below**).

The *Records Management Plan* and the evidence package have been supplied as a single document. While the Keeper has, of course, considered the whole, he is only able to formally agree the *Plan* part of the document.

The *Plan* mentions 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>.

BCS/ERMS

CMAL currently use SharePoint 2013 as a document system and are planning to expand this to act as an records management system. This is confirmed by the *High Level Project Plan* (**see above**) and by commitments in the *Plan* (for example section 3.3.11). The project will benefit from the development of the business classification scheme to provide structure. The SharePoint system

should impose version control and naming convention on electronic documents. Much of the Keeper's agreement is conditional on the successful development of this system. Although the use of SharePoint is a business decision for CMAL, the Keeper would like to remind them that SharePoint is not in itself a records management system and for full functionality, particularly relating to ensuring that metadata travels with the record when extracted from the system – for the purposes archiving for example – a records management bolt-on may be required. He notes that the Plan refers to 'additional SharePoint modules' (section 3.3.5), perhaps this is what is meant.

The development of this solution will provide CMAL with an opportunity to identify the record types routinely shared with third parties **(see element 14)**.

Records Management Champions

CMAL have indicated that they intend to identify individuals in service areas to act as information governance specialists in their local business units. The Keeper strongly commends this idea as likely to create stronger business tools and encourage buy-in. The Records/Office Manager **(see element 2)** will work with these specialists to assist the implementation of the *Plan*.

CMAL have also created a Records Management Working Group, again utilising the experience of representatives from different service areas. This group have identified gaps in provision and will monitor the initial implementation of the *Plan*. 2016 is a suggested date given in section 12 of the *Records Management Policy* **(see element 3)**.

The Keeper strongly commends the principle of involving staff from local business areas as likely to lead to a stronger implementation.

High Level Project Plan

The *Records Management Policy* **(see element 3)** states that the implementation of a structured records management plan is a new project for CMAL (*Policy* 6.1) and the introduction to the *Records Management Plan* itself makes it clear that several elements of CMAL's records management provision require improvement (section 3.2). The Keeper accepts this and has agreed much of this plan under 'improvement model' terms **(see amber elements above)**.

The *Plan* is accompanied by a *High Level Project Plan* showing actions required to properly initialise improvement in records management provision in the authority. These actions are explained against a guide to completion times. The Keeper thanks CMAL for sharing this useful document and agrees that the actions suggested are appropriate.

He requires updates on the progress of many of the actions in this plan in order to keep the CMAL submission up-to-date and to ensure that the agreed improvement plans are proceeding as expected.

Third Parties

CMAL have provided the Keeper with a letter from CEO which contains the statement that “there are no organisations contracted to carry out functions on behalf of Cmal”

6. Keeper's Summary

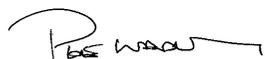
Elements 1 - 14 that the Keeper considers should be in a public authority records management plan have been properly considered by Caledonian Maritime Assets Ltd. Policies and governance structures are in place to implement the actions required by the plan.

7. Keeper's Determination

Based on the assessment process detailed above, the Keeper **agrees** the RMP of **Caledonian Maritime Assets Ltd (registered number SC001854)**.

- The Keeper recommends that Caledonian Maritime Assets Ltd 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 **Caledonian Maritime Assets Ltd (registered number SC001854)**. In agreeing this RMP, the Keeper expects Caledonian Maritime Assets Ltd to fully implement the agreed RMP and meet its obligations under the Act.



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