

Public Records (Scotland) Act 2011

Creative Scotland

The Keeper of the Records of Scotland

1st November 2017

Contents

1. Public Records (Scotland) Act 20113

2. Executive Summary4

3. Authority Background4

4. Keeper’s Assessment Process.....5

5. Model Plan Elements: Checklist6

6. Keeper’s Summary23

7. Keeper’s Determination23

8. Keeper’s Endorsement.....23

1. Public Records (Scotland) Act 2011

The Public Records (Scotland) Act 2011 (the Act) received Royal assent on 20 April 2011. It is the first new public records legislation in Scotland since 1937 and came fully into force on 1 January 2013. Its primary aim is to promote efficient and accountable record keeping by named Scottish public authorities.

The Act has its origins in *The Historical Abuse Systemic Review: Residential Schools and Children's Homes in Scotland 1950-1995* (The Shaw Report) published in 2007. The Shaw Report recorded how its investigations were hampered by poor record keeping and found that thousands of records had been created, but were then lost due to an inadequate legislative framework and poor records management. Crucially, it demonstrated how former residents of children's homes were denied access to information about their formative years. The Shaw Report demonstrated that management of records in all formats (paper and electronic) is not just a bureaucratic process, but central to good governance and should not be ignored. A follow-up review of public records legislation by the Keeper of the Records of Scotland (the Keeper) found further evidence of poor records management across the public sector. This resulted in the passage of the Act by the Scottish Parliament in March 2011.

The Act requires a named authority to prepare and implement a records management plan (RMP) which must set out proper arrangements for the management of its records. A plan must clearly describe the way the authority cares for the records that it creates, in any format, whilst carrying out its business activities. The RMP must be agreed with the Keeper and regularly reviewed.

2. Executive Summary

This report sets out the findings of the Keeper's assessment of the RMP of Creative Scotland by the Public Records (Scotland) Act 2011 Assessment Team following its submission to the Keeper on 19th May 2017.

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

3. Authority Background

Creative Scotland (a Non Departmental Public Body) is the organisation that supports the arts, screen and creative industries across all parts of Scotland on behalf of everyone who lives, works or visits here. Creative Scotland distributes funding for the arts, screen and creative industries from two primary sources, the Scottish Government and the National Lottery. This funding is the means by which they support a portfolio of organisations across Scotland, as well as how they help with the development of individuals, the funding of ideas, new work and projects, and how they deliver specific activity with partners. The Creative Scotland Board is accountable to, and appointed by, the Scottish Government. The Board provides leadership, direction, support and guidance to Creative Scotland as a whole.

<http://www.creativescotland.com/>

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 Creative 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:

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

5. Model Plan Elements: Checklist

Element	Present	Evidence	Notes
1. Senior Officer <i>Compulsory element</i>	G	G	<p>Creative Scotland has identified Iain Munro, Deputy Chief Executive, as the individual with overall responsibility for records management in the authority.</p> <p>This is confirmed by the Foreword to the Plan from Mr Munro dated May 2017 and by the Records Management Policy (see element 3) section 10.</p> <p>The Plan makes it clear that Mr. Munro fulfils this role under delegation from Janet Archer, Chief Executive of Creative Scotland who remains the 'Responsible Officer' for this element.</p> <p>The Information and Records Management Officer (see element 2) is responsible for the review of information governance policies and procedures (see element 13). Results of this review are passed up to the Deputy Chief Executive as required.</p> <p>The Deputy Chief Executive is responsible for investigating breaches of information security (for example Data Protection Policy section 11i)</p> <p>The Keeper agrees that Creative Scotland have identified a suitable individual to this role as required by the Public Records (Scotland) Act 2011 (the Act).</p>
2. Records Manager <i>Compulsory</i>	G	G	<p>Creative Scotland has identified Vickie Ambrose, Information and Records Management Officer, as the individual with day-to-day responsibility for implementing the Plan.</p>

<p><i>element</i></p>			<p>This is confirmed by the Foreword to the Plan from the Deputy Chief Executive (see element 1), dated May 2017, and by the Records Management Policy (see element 3) section 10. This states that the Records Management Officer: “creates, maintains and implements records management standards, procedures and guidance. In addition, will provide support and ensure that employees understand their responsibilities for record keeping, are appropriately trained in managing records and implement the procedures for maintaining records in accordance with this policy and associated policies and guidance. The Information and Records Management Officer will also ensure that the hard-copy record keeping system adheres to Creative Scotland’s Information Assets Register and is managed and maintained in accordance with this policy.”</p> <p>Ms. Ambrose is the author of the Plan, the Records Management Policy, the Information Management Guidance (for both see element 3) and the Data Protection Policy (see element 9).</p> <p>The Records Management Officer is responsible for maintaining the upper structure of the Information Assets Register (see element 4) – lower levels are populated by local business areas.</p> <p>The Information and Records Management Officer is responsible for processing subject access requests under the Data Protection Act 1998 (see element 9).</p> <p>The Information and Records Management Officer is responsible for the review of information governance policies and procedures (see element 13) – for example see Data Protection Policy section 2.2. Results of this review are passed up to the Deputy Chief Executive (see element 1) as required.</p> <p>The Information and Records Management Officer is responsible for monitoring the</p>
-----------------------	--	--	---

			<p>transfer and temporary retrieval of hard-copy records to the third-party storage contractor (see element 4) and for managing the quarterly destruction of those records in conjunction with the originating service area (see element 6).</p> <p>The Information and Records Management Officer will be responsible for monitoring the transfer of records to the authority’s chosen archive (see element 7).</p> <p>The Information and Records Management Officer is responsible for authorising template documents on the I drive.</p> <p>This element is the responsibility of the Deputy Chief Executive (see element 1), Ms. Ambrose’s line manager.</p> <p>The Keeper agrees that Creative Scotland have identified a suitable individual to this role as required by the Act.</p>
<p>3. Policy <i>Compulsory element</i></p>	<p>G</p>	<p>G</p>	<p>Creative Scotland has a Records Management Policy which has been supplied to the Keeper. This is version 1.0 dated February 2017 – approved by the Operations Directors Group (21FEB17).</p> <p>The Keeper agrees that the Plan supports the objectives of the Records Management Policy (see under individual elements below).</p> <p>The Records Management Policy refers to the Public Records (Scotland) Act 2011 and the Data Protection Act 1998 (see element 9).</p> <p>The Records Management Policy is part of a larger information governance framework in the organisation and the Policy cross-references to other documents (such as the Information Security Policy – see element 8).</p>

			<p>Creative Scotland also has an Information Management Guidance document which has been supplied to the Keeper. This is version 1.0 dated May 2017.</p> <p>This guidance supports statements around information security (see element 8) and record tracking (see element 11) and most other issues around information governance, including social media. This Guidance document is a key tool for Creative Scotland staff and is to be commended.</p> <p>Creative Scotland have provided the Keeper with screen shots of the email sent to all Creative Scotland colleagues containing links to Policy area and Records Management area as well as screen shots of the Policy area and the Records Management area themselves. This shows that staff have appropriate access to information governance policies, guidance and training.</p> <p>The Keeper agrees that Creative Scotland has a records management policy statement as required by the Act.</p>
<p>4. Business Classification</p>	<p>G</p>	<p>G</p>	<p>Creative Scotland's Records Management Policy (see element 3) notes that information must be retained in an "organised and efficient manner" (Policy section 6). The Plan (Introduction – section 3) explains that effective records management must ensure that information is stored in accordance with business need.</p> <p>Creative Scotland operate a hybrid system with paper records held internally; paper records held in a third-party storage provider (the majority of paper records), electronic records held on line-of-business systems and on a central shared drive on a central server (the majority of electronic records).</p> <p>A screen-shot has been provided to the Keeper showing how Creative Scotland records appear on the document management system of the third-party storage provider.</p>

			<p>Creative Scotland have created an Information Assets Register which they have shared with the Keeper (Excel version 1.0 May 2017). All public records, including those held in line-of-business systems are accounted for in the Information Assets Register.</p> <p>The top three levels of the Information Assets Register are fixed centrally and then populated at lower levels by the local service areas. There is good description of this in the Records Management Policy section 7 and Information Management Guidance document (see element 3) section 4. The Keeper commends the involvement of local business units in the creation of this central document as liable to encourage buy-in and to help create a more accurate business tool. Changes to the upper levels of the Register can only be made in consultation with the Information and Records Management Officer (see element 2) who may refer to the Deputy Chief Executive (see element 1).</p> <p>The Information Assets Register has been approved as Creative Scotland’s central records management structure by the Senior Leadership Team in the authority.</p> <p>The key Information Management Guidance document includes instruction regarding saving e-mail to the shared drive. The Keeper welcomes Creative Scotland’s recognition of the particular risks associated with the management of e-mail.</p> <p>The Keeper notes that Creative Scotland is considering the adoption of an EDRM (for example Plan page 18 ‘future developments’). The Information Assets Register would be used to populate this system. The Keeper makes no recommendation regarding the purchase of such a solution. However, it is important that Creative Scotland inform him if an EDRM is employed as this will change much of the agreed plan. Creative Scotland has, separately, agreed to do this.</p>
--	--	--	---

			<p>The Keeper agrees that the authority has a 'business classification scheme' combined with a detailed retention schedule, that appropriately reflects the functions of the authority.</p>
<p>5. Retention schedule</p>	<p>G</p>	<p>G</p>	<p>Combined Retention Schedule and Business Classification Scheme see element 4.</p> <p>Creative Scotland's Records Management Policy (see element 3) identifies good records management as being reliant on the "Development of retention schedules to cover all areas of business of the organisation" (<i>Policy</i> section 6).</p> <p>The Creative Scotland Publication Scheme on their website: http://www.creativescotland.com/search-results?type=site&collection=cs-meta&query=publication+scheme notes that the Retention & Destruction Schedule will be available in paper form but is 'Currently in development'. However, it is understood that very recently this work has been completed and the Keeper has been provided with evidence to that effect. He expects the website entry to be updated when practicable.</p> <p>Generally retention decisions are listed against record types in the Information Assets Register. For example: "Arts/Arts and Engagement/National Events/Commonwealth Games Glasgow 2014/Reports, emails, PDFs, Spreadsheets, trackers, invoices, contact info, contracts/Retention Period 7 D (destroy)". The Register also allocates information asset owners responsible for operating the destruction process when triggered by the retention decision. Disposal decisions have been allocated to the hard-copy records held by the third-party storage contractor.</p> <p>The Keeper agrees that Creative Scotland has a retention schedule that allocates</p>

			<p>retention decisions to record types appearing in the Business Classification Scheme.</p>
<p>6. Destruction Arrangements <i>Compulsory element</i></p>	<p>G</p>	<p>G</p>	<p>Creative Scotland note in their Records Management Policy (section 6) (see element 3) that they commit to: “the appropriate management of records from their creation or receipt by Creative Scotland, through their active use until final disposition – either by transfer to the National Records of Scotland, website preservation or destruction” and state in the Introduction to the Plan that effective record keeping ensures “that the correct information is...destroyed...in accordance with business need, statutory and legislative requirements” (Plan page 4).</p> <p>The Information Assets Register (see element 4) notes retention/destruction against record types.</p> <p>With this in mind Creative Scotland have the following processes in place to ensure the secure and irretrievable destruction of public records:</p> <p>Paper (internal): Internal hard copy records are destroyed using a third-party shredding company. A shredding certificate has been provided as evidence that these arrangements are operational. These arrangements are supported in the Information Management Guidance document (see element 3) – for example section 6.6.</p> <p>Paper (external): Hard-copy records held by the third-party records storage company are destroyed quarterly, on-site, under instruction from Creative Scotland. A contact has been provided as evidence of this arrangement. The Information and Records Management Officer (see element 2) is responsible for managing the quarterly destruction in conjunction with the originating service area.</p> <p>Electronic: The destruction of electronic records is, primarily, done manually,</p>

			<p>although the Keeper agrees that some line-of-business systems may have an auto-delete function. The Information Management Guidance document gives detailed instruction to staff regarding the routine deletion of electronic records (section 6). This guidance includes e-mail. The Keeper welcomes Creative Scotland’s recognition of the particular risks associated with the management of e-mail. The Information Asset Register identifies staff with responsibility for ensuring the operation of the electronic records destruction process for each record type.</p> <p>Hardware: The secure destruction of records held on redundant hardware is carried out by a third party contractor. A statement from the ICT supplier has been provided as confirmation of this arrangement. These arrangements are supported in the Information Management Guidance document – for example section 6.9.</p> <p>Back-ups: Creative Scotland quite properly keep back-up copies of public records for business continuity purposes. This is confirmed in the Information Security Policy which requires Creative Scotland to continue “to implement effective back-up procedures for the maintenance and security of electronic records.” The Keeper has been provided with evidence that Creative Scotland can be confident that back-up copies of records are irretrievably deleted as part of a structured cycle and that the Authority is aware of how long backed-up records might remain available beyond the retention period of the original.</p> <p>The Keeper agrees that Creative Scotland have procedures in place to ensure the secure and irretrievable destruction of records when appropriate.</p>
<p>7. Archiving and Transfer <i>Compulsory element</i></p>	<p>A</p>	<p>G</p>	<p>Creative Scotland 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 (MoU) regarding the transfer of records from Creative Scotland to NRS is being negotiated at the time of this assessment. This is</p>

			<p>confirmed by the NRS Client Management Team.</p> <p>The Keeper agrees these arrangements are supportive of the authority’s statement in the Plan – for example, section 3 explains that effective records management must ensure that information is preserved in accordance with business need. It also supports clauses in the Records Management Policy (see element 3) for example 6.3 and 6.5.</p> <p>The long-term preservation by NRS of records of historical interest is a principle accepted by Creative Scotland’s Senior Leadership Team Information Management Guidance document (see element 3) – section 7.</p> <p>The Information Assets Register (see element 4) notes preservation against certain selected record types.</p> <p>The Keeper acknowledges that Creative Scotland already have an agreement for NRS to harvest their website for historical purposes and the results of this arrangement are available at: http://webarchive.nrscotland.gov.uk/20170201021225/http://www.creativescotland.com/</p> <p>The Keeper notes that Creative Scotland appear to archive moving image records with the National Library of Scotland (Records Management Policy section 6.5). He has been provided with a Deposit and Access Agreement (the formal agreement between Creative Scotland (legal successor of Scottish Screen)) and the National Library of Scotland for moving image storage and preservation.</p> <p>The Keeper agrees this element of Creative Scotland’s Records Management Plan under ‘improvement model’ terms. This means that the authority has identified a gap in provision (in this case that there is no formal agreement with the archive) and is</p>
--	--	--	--

			<p>working to close that gap. The Keeper’s agreement is conditional on an MoU being concluded and a copy being provided.</p>
<p>8. Information Security <i>Compulsory element</i></p>	<p>G</p>	<p>G</p>	<p>Creative Scotland have an Information Security Policy which has been shared with the Keeper. This is version 1.0 dated May 2017.</p> <p>The Information Security Policy explains reporting procedures and considers the security of physical records and server rooms. These arrangements are supported by clauses in the authority’s Data Protection Policy (see element 9) – for example 11(d), and Information Management Guidance document (see element 3) – for example section 6.3 or 11.9.</p> <p>The guidance also considers e-mail. The Keeper welcomes Creative Scotland’s recognition of the particular risks associated with the management of e-mail.</p> <p>Information security arrangements are supported by the Information Management Guidance document and by clauses in the Records Management Policy (also element 3) - for example 6.2.</p> <p>Creative Scotland support their information security arrangements with further policies such as their Homeworking Policy (provided to the Keeper).</p> <p>Creative Scotland have provided the Keeper with screen shots of the email sent to all Creative Scotland colleagues containing links to Policy area and Records Management area as well as screen shots of the Policy area and the Records Management area themselves. This shows that staff have appropriate access to information governance policies, guidance and training.</p> <p>The Keeper should be agrees that Creative Scotland has procedures in place to ensure the security of public records as required by the Act.</p>

<p>9. Data Protection</p>	<p>G</p>	<p>G</p>	<p>Creative Scotland have a Data Protection Policy which has been supplied to the Keeper. This is version 2.0 dated February 2017.</p> <p>The authority has a general statement regarding data protection on its website: http://www.creativescotland.com/resources/our-publications/policies/data-protection</p> <p>The Data Protection Policy explains the (current) 8 principles of data protection.</p> <p>Creative Scotland are registered with the Information Commissioner as a data controller: Z2270864.</p> <p>Subject access request information is available to the public through the webpage linked above.</p> <p>Staff instruction on how to deal with subject access requests forms a section of the Data Protection Policy (section 8).</p> <p>The Data Protection Policy supports information security arrangements in the authority (see for example Data Protection Policy section 11d). The Data Protection Policy is supported by the Information Management Guidance document – for example section 18.</p> <p>Creative Scotland’s Chief Executive, Janet Archer, as accountable officer is ultimately responsible for compliance with the Data Protection Act 1998.</p> <p>Creative Scotland note in the Plan (page 16) an intention to produce guidance for staff around new data protection requirements prior to May 2018. In order that he may keep Creative Scotland’s submission up-to-date, the Keeper requests he is provided with a copy of this guidance when available.</p>
---------------------------	-----------------	-----------------	--

			<p>Creative Scotland make the following statement: “New systems that are intended for the processing of personal and sensitive personal data must have a Privacy Impact Assessment carried out on them at the conception stage of the project. This assessment will include the consideration and implementation of proper retention and destruction policies/procedures for the personal data involved.” (Information Management Guidance section 4.8 – see details at section 20.6). This principle is commended by the Keeper.</p> <p>Creative Scotland have provided the Keeper with screen shots of the email sent to all Creative Scotland colleagues containing links to Policy area and Records Management area as well as screen shots of the Policy area and the Records Management area themselves. This shows that staff have appropriate access to information governance policies, guidance and training.</p> <p>The Keeper agrees that Creative Scotland has processes in place to ensure compliance with the Data Protection Act 1998.</p>
<p>10. Business Continuity and Vital Records</p>	<p>G</p>	<p>G</p>	<p>“Creative Scotland has a Business Continuity Plan and an ICT Disaster Recovery Plan which has been reviewed and approved by Creative Scotland’s internal auditors...” (Plan page 17). This report has been shared with the Keeper. He thanks Creative Scotland for this inclusion.</p> <p>The above documents have been shared with the Keeper. The ICT Disaster Recovery Plan has been redacted and is in draft form. The Keeper agrees this is appropriate.</p> <p>The Keeper agrees that these plans consider the recovery of records.</p> <p>Creative Scotland have provided the Keeper with screen shots of the email sent to all Creative Scotland colleagues containing links to Policy area and Records</p>

			<p>Management area as well as screen shots of the Policy area and the Records Management area themselves. This shows that staff have appropriate access to business continuity arrangements. However, Creative Scotland note: “Creative Scotland’s ICT Disaster Recovery Plan is a highly technical plan which has not been shared beyond Creative Scotland’s Senior Leadership Team and ICT colleagues as it is specifically regarding the rebuilding of Creative Scotland’s IT system in the event of a major disruption to services and contains highly confidential information.” The Keeper agrees this is appropriate.</p> <p>The operation of business continuity procedures is a requirement of the Records Management Policy (also element 3) for example 6.7.</p> <p>Creative Scotland’s Chief Executive, Janet Archer, as accountable officer is ultimately responsible for recovery of operations in an emergency (Plan page 17).</p> <p>The Keeper agrees that Creative Scotland has processes in place to ensure the recovery of public records in an emergency.</p>
11. Audit trail	G	G	<p>The Records Management Policy (see element 3) notes that the systematic management of records will allow an organisation to “know what records it has and locate them easily” (Policy section 3) and that “Records can be readily accessed by those with appropriate authority when required.” (appendix 1). The Information Management Guidance document (also element 3) notes that managing records correctly includes “making it available” (Guidance section 1). The Plan (Introduction – section 3) explains that effective records management must ensure that information is retrieved in accordance with business need.</p> <p>With this in mind Creative Scotland has the following record tracking (audit trail) processes in place.</p>

			<p>Paper records held internally are tracked with registers and cover sheets. This is explained in detail in the Information Management Guidance document section 6.</p> <p>Paper records held by the third-party storage provider are tracked using box lists and the third-party provider’s EDRM. This is confirmed in the Information Management Guidance document section 5 and explained in the Plan (page 18).</p> <p>Electronic records on line-of-business systems: The Keeper agrees that line-of-business systems (for example finance) will impose an audit trail.</p> <p>Electronic records on the shared drive: As the shared drive does not automatically impose audit trail tracking functionality it is a requirement that records can be located through a search facility. This, in turn, imposes a requirement on record creators that they operate standardised naming and version control procedures. Creative Scotland provide their staff with detailed naming convention/version control guidance in the Information Management Guidance document - sections 8 and 9.</p> <p>The Keeper agrees that Creative Scotland have processes in place that will allow them to locate public records and identify the correct version as required.</p>
<p>12. Competency Framework for records management staff</p>	<p>G</p>	<p>G</p>	<p>Creative Scotland have included Vickie Ambrose’s job description as part of their evidence package. This shows that she “will proactively develop strategy, policy, standards and processes for the management of organisational records and data in compliance with applicable legislation and standards to ensure that records and data are appropriately managed and stored both electronically and in hard copy and are in line with organisational systems and databases.” The Job Description includes ‘competencies’, such as “Proven ability to put in place effective arrangements for the storage and management of information and data.” The Keeper agrees these competencies are suitable for the role of implementing the Plan. However, the Keeper notes that this Job Description is in draft form only.</p>

			<p>Creative Scotland have explained that “The job description and competencies are currently being reviewed to ensure that additional key responsibilities relevant to the role are included.”</p> <p>Creative Scotland have also provided the <i>Information and Records Management Officer Objectives</i> which show Ms Ambrose has information governance responsibilities including those specifically around the creation and implementation of the <i>Plan</i>.</p> <p>The Records Management Policy confirms that the Information and Records Management Officer is responsible for: “creates, maintains and implements records management standards, procedures and guidance.”</p> <p>Creative Scotland make the following statement which is welcomed by the Keeper: “Creative Scotland is supportive of records management learning and development requirements and that the Information & Records Management Officer is kept informed of any relevant legislative changes, records management developments etc.” (Plan page 19).</p> <p>The Information and Records Management Officer is a member of the Information Records Management Society (IRMS). The authority has provided the Keeper with training schedules and certificates as evidence that Ms. Ambrose undertakes relevant professional development opportunities. The Keeper thanks Ms. Ambrose for including these in the Creative Scotland submission.</p> <p>Training staff in information governance procedures is a requirement of the Records Management Policy (see element 3) section 6.7.</p> <p>Training in the authority’s data protection responsibilities forms part of the staff induction process.</p>
--	--	--	--

			<p>The Keeper has been provided with a screen-shot showing how information governance related news stories are distributed to staff.</p> <p>The Keeper acknowledges that policies and procedures submitted in evidence have review dates (see element 13) and a commitment to provide training to staff if these reviews result in changes in procedure (for example Data Protection Policy section 11g).</p> <p>Under future developments on page 15 of the Plan Creative Scotland commit to a 2017 information security training programme. The Keeper commends this and would be interested in seeing a sample of any further training that can be provided.</p> <p>The Keeper agrees that the individual identified at element 2 has appropriate support, in the form of training, responsibility, skills etc. to implement the Creative Scotland Records Management Plan. Furthermore, the Keeper agrees that staff receive training in information governance issues.</p>
<p>13. Assessment and Review</p>	<p>G</p>	<p>G</p>	<p>The Act requires a scheduled public authority to “keep its records management plan under review” (part 1 5.1 (a)).</p> <p>The regular review of the Plan (and other ‘procedures and practices’) is a specific commitment in the Foreword to the Plan written by the Deputy Chief Executive (see element 1).</p> <p>Creative Scotland have created procedures to ensure that this review is carried out:</p> <p>The Records Management Plan will be reviewed by the Information and Records Management Officer (see element 2) and reported up to the Business Operations Directors Group. The review will utilise a bespoke process which has been shared</p>

			<p>with the Keeper.</p> <p>The Keeper acknowledges that policies and procedures submitted in evidence have review dates determined in their clauses (normally annually). For example Plan page 15 – Information Security Policy review and assessment.</p> <p>The business continuity arrangements in the authority (see element 10) are scheduled for a test in 2017. The Keeper requests that he is alerted if this test results in procedural changes in regard to the recovery of public records.</p> <p>The authority’s registration with the Information Commissioner is currently due to be renewed by 30 June 2018. The Keeper accepts that this may change under GDPR coming into force May 2018.</p> <p>The Keeper agrees that Creative Scotland have made arrangements for the review of the implementation of their Records Management Plan as required by the Public Records (Scotland) Act 2011. The Keeper has seen evidence of responsibilities, reporting system, timescale and methodology of this review.</p>
14. Shared Information	N/A	N/A	<p>Creative Scotland does not consider this element applicable to its ‘business as usual activities’ as it does not engage in the routine, systematic, formal sharing of information with a third-party.</p> <p>The Keeper agrees this element does not apply to this authority.</p>

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 Creative 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 **Creative Scotland**.

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



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