

Public Records (Scotland) Act 2011

**Education Scotland
(Part of Scottish Ministers)**

Assessment Report

The Keeper of the Records of Scotland

13th October 2015

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1. Public Records (Scotland) Act 2011

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

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

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

2. Executive Summary

This report sets out the findings of the Keeper's assessment of the RMP of **Education Scotland (Part of 'Scottish Ministers')** by the Public Records (Scotland) Act 2011 Assessment Team following its submission to the Keeper on **18th December 2014**.

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

3. Authority Background

Education Scotland was established on 1 July 2011 by the Cabinet Secretary for Education and Lifelong Learning as a new public body, charged with supporting quality and improvement in Scottish Education and thereby securing the delivery of better learning experiences and outcomes for Scottish learners of all ages. The organisation's status as an Executive Agency means that it operates independently and impartially, whilst remaining directly accountable to Scottish Ministers for the standards of its work. This status safeguards its independence of inspection, review and reporting within the overall context of the National Performance Framework. It is headed by a Chief Executive who is responsible to Scottish Ministers for its management, performance and future development.

<http://www.educationscotland.gov.uk/>

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 Education 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.
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5. Model Plan Elements: Checklist

Element	Present	Evidence	Notes
1. Senior Officer <i>Compulsory element</i>	G	G	<p>Education Scotland has identified its Chief Operational Officer, Alan Delaney, as the individual with overall responsibility for records management in the authority.</p> <p>This appointment is confirmed by a letter from Mr Delaney dated 2nd September 2015 (evidence 1) and the <i>Records Management Policy</i> (section 8.2) (see element 3).</p> <p>In this letter Mr Delaney identifies Stuart Robinson, Assistant Director: Corporate Services, as the officer with day-to-day responsibility for the RMP (see element 2). He also endorses the <i>Records Management Policy</i> (see element 3) and commits Education Scotland to review its RMP annually (see element 13).</p> <p>The Keeper agrees that Education Scotland has identified an appropriate individual to this role as required by the Act.</p>
2. Records Manager <i>Compulsory element</i>	G	G	<p>Education Scotland has identified its Assistant Director: Corporate Services, Stuart Robinson, as the officer with day-to-day responsibility for the submitted RMP.</p> <p>This appointment is confirmed by a letter from Mr Delaney (see element 1) dated 2nd September 2015 and the <i>Records Management Policy</i> (section 8.3) (see element 3).</p> <p>Mr Robinson is Education Scotland's SIRO. As such he is responsible for</p>

			<p>information security (see element 8) and business continuity (see element 10). The SIRO is also responsible for providing training, advice and guidance for appropriate staff on matters relating to information assurance (see element 12).</p> <p>As SIRO Mr Robinson is responsible for reporting to the Resources Board regarding compliance with the <i>Records Management Policy</i> (see element 3).</p> <p>Education Scotland has supplied Mr Robinson’s roles and responsibilities (evidence 2). The <i>Records Management Policy</i> states (section 8.3) that The Assistant Director: Corporate Services is supported by the Assistant Director with responsibility for knowledge management.</p> <p>Mr Robinson will be supported in the implementation of the <i>Plan</i> by the Information Officer, Janice Alexander.</p> <p>The Keeper agrees that Education Scotland has identified an appropriate 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>Education Scotland have supplied the Keeper with their <i>Records Management Policy</i>, Version 020615 (evidence 4). The policy was approved in June 2014. Minutes of the Corporate Management Group approving the policy have also been provided (4a) at which ‘CMG agreed to accept the policy’. The author of the <i>Policy</i> is not identified.</p> <p>This policy is endorsed by the Chief Operating Officer of the authority in his covering letter (see element 1). In this letter he confirms that Senior Management in the authority is responsible for the <i>Policy</i>’s dissemination locally. This letter also commits the authority to ‘continue to promote the [records management] policy to staff across Education Scotland’. The Corporate Management group is responsible for the <i>Policy</i>. As SIRO Mr Robinson (see element 2) is responsible for reporting to</p>

			<p>the Resources Board regarding compliance with the <i>Records Management Policy</i>.</p> <p>The <i>Policy</i> commits Education Scotland to managing records efficiently and recognises records as an important asset for the organisation (page 1 and 5.1). Section 5 of the <i>Policy</i> gives a good explanation of the value of robust records management generally. The six key principles from the <i>Policy</i> are repeated in the RMP. The RMP is referred to in the <i>Policy</i> (2.3).</p> <p>The <i>Policy</i> is published online at: http://www.educationscotland.gov.uk/about/policies/recordsmanagement.asp</p> <p>The RMP (page 5) commits Education Scotland to review the <i>Records Management Policy</i> 'regularly' (see element 13). The reporting structure is made clear in section 8.5.</p> <p>The <i>Records Management Policy</i> is referenced in the introduction to the RMP (RMP page 1). The <i>Policy</i> references PRSA (section 6.1).</p> <p>The <i>Records Management Policy</i> is published on the authority's Intranet. A screen shot has been provided to the Keeper as evidence.</p> <p>The Keeper agrees that Education Scotland has an approved and operational records management policy.</p>
4. Business Classification	A	G	<p>Education Scotland has a file plan covering the functions of the authority. This has been supplied to the Keeper as evidence 5. It was developed 'collaboratively by each directorate'. The Keeper commends the involvement of local service areas in the creation of a business classification.</p> <p>Education Scotland operates a hybrid system of electronic and paper records. The</p>

			<p><i>Policy</i> states (section 9.2) ‘some central office functions are currently paper based and indexed on the records management database’. When the move to eRDM is completed the Records Management Database will still manage the legacy paper files and if there is a requirement for any further paper files these will be registered in eRDM.</p> <p>The business classification for paper records (evidence 30a) is currently further advanced than that for electronic records showing ‘owner’; who holds the file and other ‘information asset’ information. The retention schedule for paper files is a separate document which has also been supplied (evidence 6).</p> <p>However, at time of submission, it has been agreed that the records of Education Scotland, traditionally arranged by business area (‘hierarchical’) will be added to the Scottish Government ERDM <i>Objective</i> which is subject based. This will involve a restructuring of the business classification (discussed in section 7 of evidence 10). The Keeper has already agreed much of the SG system.</p> <p>Education Scotland has supplied the Keeper with the business plan for the development of the authority’s records management provision by adopting the SG system (evidence 12). Minutes of the Corporate Management Group, approving the business plan in December 2014, have been supplied (evidence 12a).</p> <p>The process for implementing this change appears in the Education Scotland improvement plan.</p> <p>The adoption of the Scottish Government system will materially affect records management provision in the authority.</p> <p>The Keeper has been provided with a <i>Business Classification Pilot</i> as evidence 39.</p>
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			<p>See <u>Third Parties</u> Under General Comments at end.</p> <p>The Keeper is able to agree this element of the education Scotland RMP on improvement model terms awaiting the move over to the Scottish Government’s system. He requests that he is kept up-to-date as this project progresses.</p>
5. Retention schedule	A	G	<p>Education Scotland recognises in their <i>Records Management Policy</i> (see element 3) that a robust retention schedule is vital to a records management programme (section 10.2). They have provided the retention schedule for their hard-copy records (evidence 6). This has been approved by senior management.</p> <p>Currently retention decisions are not properly imposed on electronic records. This is acknowledged and the authority has an approved programme for closing this gap in provision ‘through the implementation of the Scottish Government’s eRDM system’ (RMP page 7). See element 4 for comments regarding the approved adoption of the SG records management system by Education Scotland in 2015 and the business case for this project. (also see <i>Improvement Plan</i> under General Comments below).</p> <p>The <i>Records Management Policy</i> (see element 3) features ‘Retention’ (section 10).</p> <p>The Keeper is able to agree this element of the Education Scotland RMP on improvement model terms awaiting the move over to the Scottish Government’s system. He request that he is kept-up-to date as this project progresses.</p>
6. Destruction Arrangements	A	G	<p>Paper: Hard copy records are irretrievably destroyed in line with the <i>Paper Retention Schedule</i> (see element 5) under contract with an external shredding</p>

<p><i>Compulsory element</i></p>	<p></p>	<p></p>	<p>company (Shred-It). This operates in multiple sites. A certificate has been provided (evidence 13) to demonstrate that this arrangement is in operation.</p> <p>Hardware: Obsolete hardware containing records is securely destroyed under contract with an external company (CCL North). A certificate has been provided (evidence 16) to demonstrate that this arrangement is in operation.</p> <p>Back-Ups: Education Scotland uses the Scottish Government’s shared services system. The Scottish Government do daily incremental backups and then at the weekend full back ups are taken of the system. The backups are then kept for four weeks and are then destroyed and the information then becomes irretrievable (statement from SG dated October 2014 submitted as evidence 14).</p> <p>Electronic: There is a clear statement in the <i>Records Management Plan</i> explaining that the irretrievable destruction of records held electronically is problematic. Education Scotland has instigated an approved action plan to address this as their electronic records migrate to the Scottish Government EDRM (see element 4 and Improvement Plan under General Comments below). The Keeper can therefore agree this part of element 6 under ‘Improvement Model’ terms. This means that he recognises that an authority has identified a gap in records management provision and has instigated a programme that will close that gap.</p> <p>The Keeper agrees this element of Education Scotland’s <i>Records Management Plan</i> on the condition that he is kept informed of progress towards the adoption of systems which will facilitate the secure and irretrievable destruction of electronic records when appropriate.</p>
<p>7. Archiving and Transfer <i>Compulsory</i></p>	<p>A</p>	<p>G</p>	<p>Education Scotland has identified the National Records of Scotland as the repository to which they will transfer records selected for permanent preservation.</p>

<p><i>element</i></p>			<p>Once all Education Scotland records are fully integrated into the Scottish Government system (see element 4 for details), transfer arrangements will map those of the Scottish Government under their existing service level agreement.</p> <p>The Keeper agrees that Education Scotland has identified a suitable repository and that appropriate archiving arrangements will fall in to place with the move over to the Scottish Government’s system. He requests that he is kept up-to-date as this project progresses.</p>
<p>8. Information Security Compulsory element</p>	<p>G</p>	<p>G</p>	<p>Mr Robinson (see element 2), as Education Scotland’s SIRO, is responsible for information security in the authority.</p> <p>Education Scotland subscribes to the <i>Scottish Government IT Security Policy</i> a summary of which has been provided to the Keeper as evidence 18. The main (105 page) document can be considered best practice and the Keeper commends Education Scotland for adopting it. This policy is supported by a suite of policies from SG Security (evidence 19 – 23). Education Scotland also subscribe to the Government Security Classification Policy: https://www.gov.uk/government/publications/government-security-classifications</p> <p>The <i>SG IT Security Policy</i> and Standards has no expiry date, but is reviewed: (a) Annually on the anniversary of its first approval. (b) Where there any proposals for significant organisational, supported service or customer base change.</p> <p>Education Scotland also subscribes to the Scottish Government IT Code of Conduct (provided as evidence 23).</p> <p>Education Scotland have Information Asset Owners who have been issued with guidance. The <i>Scottish Government Information Asset Owner Handbook</i> has been</p>

			<p>provided to the Keeper as evidence 21. This <i>Handbook</i> is approved by Sarah Davidson SG SIRO, however it is not dated. As it has been supplied in evidence and the RMP (page 12) states that ‘All Information Asset Owners have been briefed and have been provided with guidance on the role’, the Keeper accepts that Education Scotland have adopted the guidance offered in the <i>Handbook</i>.</p> <p>The <i>Records Management Policy</i> (see element 3) features ‘Information Security’ (section 11) in which it is recognised that robust Information Security is ‘intrinsically linked’ to a records management programme (section 11.1).</p> <p>The Keeper has been sent a staff leaflet <i>Working with Official Information</i>.</p> <p>The Keeper agrees that Education Scotland has an approved and operational information security policy as required by the Act.</p>
9. Data Protection	G	G	<p>Education Scotland features a Data Protection statement on its website at: http://www.educationscotland.gov.uk/about/foi/dataprotection/index.asp</p> <p>This statement includes an explanation of how the public can make subject access requests; http://www.educationscotland.gov.uk/about/foi/dataprotection/subjectaccessrequests.asp</p> <p>Education Scotland has adopted the principles of the Scottish Government Data Protection Policy (copy supplied as evidence 25). This policy does can be found at: http://www.scotland.gov.uk/About/Review/kerelaw/About/Review/data-protection</p> <p>Education Scotland is registered with the Information Commissioner under ‘Scottish Ministers’: Z4857137</p>

			<p>Data protection is a theme of the <i>Information Asset Owner – Handbook</i> (evidence 21). Section 5.1 lists the compulsory training that Information Asset Owners and their staff undertake. This includes a ‘tool’ on the Data Protection Act. The RMP (page 14) commits Education Scotland to provide training packages on Data Protection to all appropriate staff.</p> <p>All employees undertake mandatory, annual, data protection e-learning training.</p> <p>Education Scotland have provided their <i>Privacy Impact Assessment</i> as evidence 37.</p> <p>The Keeper agrees that Education Scotland has understood their responsibilities under the Data Protection Act 1998.</p>
<p>10. Business Continuity and Vital Records</p>	<p>G</p>	<p>G</p>	<p>Mr Robinson (see element 2), as Education Scotland’s SIRO, is responsible for business continuity.</p> <p>Education Scotland uses the Scottish Government shared services system which is covered by the Scottish Government business continuity arrangements with which the Keeper is familiar:</p> <p>The Scottish Government operates a business continuity plan that includes records management. This involves regular back-ups (see element 6 above – destruction of back-ups).</p> <p>There is a commitment by the Scottish Government to review the <i>Business Continuity Plan</i> annually.</p> <p>There is a statement in the RMP (page 15): ‘Paper records that are vital to the function of the Agency are kept safely and securely within the various Education Scotland buildings’.</p>

			The Keeper agrees that Education Scotland is covered by an operational business continuity plan that considers the recovery of records.
11. Audit trail	A	G	<p>See element 4 for comments regarding the approved adoption of the SG records management system by Education Scotland in 2015.</p> <p>The paper file scheme supplied as evidence 30a combined with a sample screen shot (30) of how it appears in practice suggests that an audit trail is in operation for paper records. This is supported by statements in the <i>Records Management Policy</i> (for example section 9.2). The current electronic records system does not lend itself to the auditing of electronic records. This gap in provision should be closed by the agreed programme of migrating Education Scotland on to the SG systems.</p> <p>The <i>Records Management Policy</i> (see element 3) features ‘version control and naming conventions’ (section 7.1).</p> <p>(See <i>Improvement Plan</i> under General Comments below).</p> <p>The Keeper is able to agree this element of the education Scotland RMP on improvement model terms awaiting the move over to the Scottish Government’s system. He request that he is kept-up-to date as this project progresses.</p>
12. Competency Framework for records management	G	G	<p>Education Scotland has supplied the SIRO’s (see element 2) roles and responsibilities as evidence 2. These make clear that he has appropriate seniority and expertise to undertake the role identified.</p> <p>Education Scotland has supplied the competencies required by their Records</p>

<p>staff</p>			<p>Manager. This post is currently being filled by Information Officer, Janice Alexander.</p> <p>Education Scotland have Information Asset Owners who have been provided guidance. The <i>Scottish Government Information Asset Owner Handbook</i> has been provided to the Keeper as evidence 21.</p> <p>The covering letter from Education Scotland’s Chief Operating Officer confirms that records management forms part of the staff induction process. This letter also commits the authority to ‘continue to promote the [records management] policy to staff across Education Scotland’.</p> <p>All employees undertake Information Security training ‘Responsible for Information’.</p> <p>All employees undertake mandatory, annual, data protection e-learning training. There is also training available ‘concerning the procedures and considerations for electronic and hard copy distribution of information’ (RMP page 20).</p> <p>Education Scotland has also run awareness sessions on records management and the PRSA. This forms evidence 32.</p> <p>The Keeper agrees that the individual who will carry the responsibility for having day-to-day responsibility for implementing the RMP will have appropriate skills for the role. Furthermore, the Keeper acknowledges that Education Scotland considers records management training for appropriate staff.</p>
<p>13. Assessment and Review</p>	<p>G</p>	<p>G</p>	<p>Education Scotland commits to review the RMP annually as part of its information assurance review. This is confirmed by a letter from the Chief Operating Officer (see element 1) and in the RMP itself (page 2).</p> <p>Review of records management ‘policy, procedures and practices’ is also</p>

			<p>referenced in the introduction to the RMP (RMP page 1).</p> <p>The Corporate Management group is responsible for the ‘review of supporting procedures and guidelines’ (<i>Policy</i> section 8.1).</p> <p>‘The RMP will also be reviewed once Education Scotland moves to the Scottish Government’s eRDM system’ (see element 4) (quote from RMP page 19).</p> <p>The <i>Records Management Policy</i> (see element 3) features ‘Review’ (section 12).</p> <p>The RMP (page 5) commits Education Scotland to review the <i>Records Management Policy</i> (see element 3) ‘regularly’. The Keeper assumes that this review will form part of the ‘organisation’s existing annual process to review Information Assurance’ mentioned in the letter from the Chief Operating Officer. Policies will be reviewed by the Head of Knowledge Management and signed off by the Resources Board.</p> <p>The RMP and the <i>Records Management Policy</i> will be reviewed by the SIRO and reported to the Resources Board. Updates to records management policies and guidance are made available on the Education Scotland Intranet (screen shot provided in evidence).</p> <p>The <i>SG IT Security Policy</i> and Standards has no expiry date, but is reviewed: (a) Annually on the anniversary of its first approval. (b) Where there any proposals for significant organisational, supported service or customer base change.</p> <p>There is a commitment by the Scottish Government to review the <i>Business Continuity Plan</i>, to which Education Scotland subscribes, annually.</p> <p>The Keeper agrees that the Education Scotland has installed a formal review</p>
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			procedure as part of their records management plan as required by the Act, and that clear review dates have been allocated to each of the supplied policy documents.
14. Shared Information	G	G	<p>An example of a data sharing agreement and an access protocol (for head teachers) has been supplied as evidence.</p> <p>Education Scotland shares information using established protocols adopted from the Scottish Government: Scottish Government employs a standard data sharing agreement template (supplied as evidence 26) which includes information governance and security clauses section 6.1 and 6.2 of the guidance.</p> <p>A commitment to collaborative working is specifically mentioned in the introduction to the RMP (page 2).</p> <p>The Keeper agrees that Education Scotland have considered the records management implications of information sharing as is appropriate.</p>

General Notes on RMP, Including Concerns:

Version

This assessment is on the RMP submitted to the Keeper 2nd June 2015. There is no version number, approval date or author given. Education Scotland commits to review the RMP annually as part of its information assurance review (**see element 13**).

The introduction to the RMP (page 1) recognises records as a corporate asset. The introduction to the RMP is a strong one that supports the *Records Management Policy* (**see element 3**) and introduces records management principles.

The submission is accompanied by a letter from Alastair Delaney, Chief Operating Officer of Education Scotland (**see element 1**) dated 2nd September 2015. In this letter he identifies himself as the senior officer with responsibility for records management in the

authority. This letter also identifies Stuart Robinson, Assistant Director: Corporate Services (**see element 2**) as the officer with day-to-day responsibility for the RMP. Mr Delaney's letter endorses the *Records Management Policy* (**see element 3**).

The submitted RMP is based on the 14 elements of *the Keeper's Model Plan*: <http://www.nrscotland.gov.uk/record-keeping/public-records-scotland-act-2011/resources/model-plan-guidance>

Situation in Authority

Records Management falls to the Strategy, Performance and Corporate Resources Directorate of Education Scotland. There is a Records Management Group established (*Policy* section 8.4). Strategic Directors are information asset owners (IAOs) for their service areas. The Scottish Government IAO handbook, followed by Education Scotland has been provided (evidence 21). The Keeper commends the principle of local responsibility, with clear reporting structures, being adopted in Education Scotland.

Policies and Procedures

The RMP states that records management policies and procedures, unique to Education Scotland such as their *Records Management Policy* have been created in consultation with 'colleagues across the organisation' (RMP page 19). The Keeper commends this involvement as more likely to engender buy-in and create stronger business tools.

Improvement Plan

In several places, for example page 6, the RMP mentions an *Education Scotland Improvement Plan* in relation to the eDRMS. The extract of Draft Minute of CMG meeting submitted as evidence 12a approves the submission of the *Improvement Plan* along with the RMP. The *Improvement Plan* has now been submitted. It lays out the steps that HIE will take over the next few years to action the improvements explained in the RMP.

The *Improvement Plan* is not dated. There is no version number. That said, the issues raised and actions proposed in the *Improvement Plan* match those in the RMP and the Keeper agrees that the timescales appear reasonable. The business case for the *Improvement Plan* was submitted to, and approved by, Education Scotland's Corporate Management Group.

Elements 4, 5, 6 and 11 have been agreed under the Keeper's 'improvement model' terms partly in consideration of the actions in the Education Scotland *Improvement Plan*.

The Keeper thanks Education Scotland for the inclusion of this document.

Third Parties

Education Scotland contract some of their functions to third parties. They use the Scottish Government procurement contracts which contain details of what should happen to information that they produce on behalf of the authority. A sample contract has been provided as evidence 41.

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 Education 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 **Education Scotland (Part of 'Scottish Ministers')**.

- The Keeper recommends that Education 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 **Education Scotland (Part of Scottish Ministers)** In agreeing this RMP, the Keeper expects Education Scotland to fully implement the agreed RMP and meet its obligations under the Act.



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