

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

### **Highlands and Islands Enterprise Assessment Report**

**The Keeper of the Records of Scotland**

**13 March 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 **Highlands and Islands Enterprise** by the Public Records (Scotland) Act 2011 Assessment Team following its submission to the Keeper on 22<sup>nd</sup> December 2014.

The assessment considered whether the RMP of Highlands and Islands Enterprise 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 Highlands and Islands Enterprise complies with the Act can be found under section 7 of this report with relevant recommendations.

## 3. Authority Background

Highlands and Islands Enterprise is the Scottish Government's economic and community development agency for the north and west of Scotland. HIE's purpose is to generate sustainable economic growth across the Highlands and Islands. As a Scottish Government agency, HIE's role is to lead regional growth and development, to seek investment opportunities, and to ensure that the Highlands and Islands derives maximum benefit from existing and emerging opportunities. HIE operates across offices throughout the Highlands and Islands, including area offices, serving local businesses and communities from the Outer Hebrides to Moray and from Shetland to Argyll.

<http://www.hie.co.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 Highlands and Islands Enterprise's RMP was developed with proper regard to the elements of the Model Plan and is compliant with the Act. The assessment also considered whether there was sufficient supporting evidence of such compliance.

### Key:

<b>G</b>	The Keeper agrees this element of an authority's plan.		<b>A</b>	The Keeper agrees this element of an authority's plan as an 'improvement model'. This means that he is convinced of the authority's commitment to closing a gap in provision. He will request that he is updated as work on this element progresses.		<b>R</b>	There is a serious gap in provision for this element with no clear explanation of how this will be addressed. The Keeper may choose to return the RMP on this basis.
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## Highlands and Islands Enterprise (HIE)

### 5. Model Plan Elements: Checklist

Element	Present	Evidence	Notes
1. Senior Officer <i>Compulsory element</i>	<b>G</b>	<b>G</b>	<p>Highlands and Islands Enterprise (HIE) have identified Forbes Duthie, Director of Finance and Corporate Services as the individual with overall responsibility for records management in the authority.</p> <p>This is supported by a letter from Alex Paterson, CEO of HIE (evidence 1) and from Mr Duthie himself (evidence 2)</p> <p>Forbes Duthie is SIRO for HIE.</p> <p>Forbes Duthie is a member of the HIE Leadership Team.</p> <p>Mr Duthie chairs the Information Governance Group (<b>see <i>Information Governance Group</i> under <i>General Comments</i> below</b>).</p> <p>The Keeper agrees that Highlands and Islands Enterprise have identified an appropriate individual to this element as required in the Act.</p>
2. Records Manager <i>Compulsory element</i>	<b>G</b>	<b>G</b>	<p>Highlands and Islands Enterprise have identified Jennifer Boyle, Information and Records Manager as the individual with day-to-day responsibility for implementing the RMP in the authority.</p> <p>This is supported by Ms. Boyle's job description (evidence 7) and work objectives (evidence 8). There is a specific work objective around the submission and</p>

			<p>implementation of the RMP. The Keeper is pleased to see this particularly highlighted.</p> <p>Ms Boyle manages the Information and Records Officer and is responsible for the development of policy and procedures involving information management. For example:</p> <p>Ms Boyle is the author of the <i>RMP</i>.</p> <p>Ms Boyle is responsible for the <i>Information Management Strategy (see Information Management Strategy under General Comments below)</i>.</p> <p>Ms. Boyle created the <i>Records Management Policy (see element 3)</i>.</p> <p>Ms Boyle sits on the Information Governance Group (<i>see Information Governance Group under General Comments below</i>).</p> <p>Ms. Boyle is the EDRMS Manager.</p> <p>The above demonstrates that Ms. Boyle has a detailed knowledge of the records management provision in HIE.</p> <p>The Records and Information Manager has a responsibility for the delivery of appropriate training to other HIE staff.</p> <p>The Information and Records Manager has oversight of the electronic records destruction process.</p> <p>Ms Boyle reports to the Head of Corporate Information.</p>
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			The Keeper agrees that Highlands and Islands Enterprise have identified an appropriate individual to this element as required in the Act.
3. Policy Compulsory element	<b>G</b>	<b>G</b>	<p>Highlands and Islands Enterprise has a <i>Records Management Policy</i> which has been supplied to the Keeper (evidence 9). This policy is dated November 2014 and was created by the Information and Records Manager (<b>see element 2</b>).</p> <p>The <i>Records Management Policy</i> is made available to HIE staff on the intranet. A screen shot showing a sample page from the records management section of the Intranet has been supplied (evidence 12).</p> <p>The <i>Records Management Policy</i> supports the development of the EDRM (<b>see element 4</b>).</p> <p>The Keeper agrees that Highlands and Islands Enterprise has an approved and operational records management policy that is available to all staff.</p>
4. Business Classification	<b>G</b>	<b>G</b>	<p>Highlands and Islands Enterprise have a full business classification scheme (<i>File Plan</i>) that has been provided to the Keeper (evidence 13).</p> <p>The scheme is a functional one. This must remain a business decision for HIE, but the Keeper acknowledges that functional business classification schemes are currently considered best practice.</p> <p>HIE have operated an EDRM system for over ten years. Ms. Boyle (<b>see element 2</b>) is the EDRMS Manager. This has recently (2014) been upgraded as part of a suite of ongoing projects in HIE (<b>see Information Management Strategy and Major HIE Corporate Projects under General Comments below</b>). Upgrading the EDRM system is supported by the revised Records Management Policy (<b>see element 3</b>).</p>



			<p>Highlands and Islands Enterprise operates a hybrid system; public records held in paper form are referenced in the EDRM. Local 'file custodians' monitor access to paper files. Thus retention decisions, information security and 'audit trail' can be imposed on hard-copy records that lie outwith the EDRM. Similarly, the records held temporarily on structured drives (procurement is an example given) are linked to the EDRM. As a result of developing a detailed programme plan for Strategy implementation the date for moving content from Shard Drives is estimated at April 2016. <b>The Keeper would like to be updated on this project in order to keep HIE's submission up-to-date.</b></p> <p>The Keeper has been provided with some of the EDRM guides that are supplied for HIE staff (evidence 11). These include instructions on how to add documents to the system, search for documents and save e-mails to the EDRM.</p> <p>The business classification scheme (file plan) is due for review in 2015. This review will involve the relevant business units. There appears to be a general acknowledgement of the importance of engaging local records management 'champions'. On page 14 of the RMP HIE states that it intends to create Content Administrators within "teams across HIE". The Keeper commends the principle of involving local business areas in reviewing the scheme.</p> <p>HIE have decided to contact Scottish Enterprise, another Scottish public authority that has similar functions, to share best practice regarding the structure of their file plan. The Keeper wholly approves of this decision. Shared experience is entirely in the spirit of PRSA.</p> <p>The Keeper agrees that Highlands and Islands Enterprise have an operational business classification scheme that covers all the functions of the authority.</p>
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<p>5. Retention schedule</p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>Highlands and Islands Enterprise have a <i>Retention Schedule</i> that covers the records created during the activities explained in their Business Classification Scheme (file plan). This has been supplied to the Keeper (evidence 15).</p> <p>Staff guidance for the use of retention schedules has been supplied to the Keeper (evidence 17).</p> <p>The <i>Retention Schedule</i> has been in place for several years and was approved by the Leadership Team (<b>see element 1</b>). The retention decisions are currently being reviewed, particularly when records are transferred from the structured drives to the EDRM. This transfer is an ongoing project for certain classes of records (such as procurement and HR).</p> <p>HIE operates a hybrid system; public records held in paper form are referenced in the EDRM. Thus retention decisions and ‘audit trail’ can be imposed on hard-copy records that lie outwith the EDRM.</p> <p>HIE commits to destroy records at the end of their retention periods (RMP page 8). Before destruction file lists are sent to NRS (<b>see element 7</b>) to allow them time to identify records that might be worthy of permanent preservation.</p> <p>The Keeper agrees that Highlands and Islands Enterprise have an operational retention schedule that matches their business classification.</p>
<p>6. Destruction Arrangements <i>Compulsory element</i></p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>Highlands and Islands Enterprise commits to destroy records at the end of their retention periods (RMP page 8).</p> <p>Paper internal: Physical paper records are destroyed through a contract with an external data shredding company. A description of how this procedure works features in the RMP (page 8) and a contract has been supplied to the Keeper as</p>

			<p>evidence that these arrangements are in place (evidence 19).</p> <p>Paper external: Paper records stored off-site are recalled at the end of their retention period and destroyed under the same procedure as explained in ‘Paper internal’ above.</p> <p>Electronic: An explanation of the process around the destruction of electronic records is provided in the RMP (page 8). This seems to indicate that HIE have firm control over this procedure. The Information and Records Manager has oversight of the destruction process. Metadata from the deleted record is preserved as evidence of what was destroyed.</p> <p>Hardware: The destruction of redundant hardware is facilitated through an external contract. A destruction certificate has been provided as evidence that these arrangements are operational (evidence 18). Mobile phones, which may contain corporate information, have their data removed - Good for Enterprise (<a href="https://uk.good.com/">https://uk.good.com/</a>) - before re-use.</p> <p>Back-ups: An explanation of the back-up tape cycle appears in the RMP (page 8). This is part of an arrangement put in place for business continuity (<b>see element 10</b>).</p> <p>The Keeper agrees that Highlands and Islands Enterprise have procedures in place to irretrievably destroy records when appropriate as required by the Act.</p>
<p>7. Archiving and Transfer <i>Compulsory element</i></p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>Highlands and Islands Enterprise transfer records selected for permanent preservation to The National Records of Scotland.</p> <p>This arrangement is already operational with HIE providing the Keeper’s client managers with file lists prior to destruction.</p>

			<p>A formal MOU is being negotiated, but as the arrangements are already in place and functioning the Keeper can agree this element without its conclusion. The Keeper would like to be informed when the MOU is formally in place.</p> <p>The above is confirmed by the Keeper's client managers.</p> <p>The Keeper agrees that Highlands and Islands Enterprise have proper arrangements in place for the permanent preservation of records as required by the Act.</p>
8. Information Security <i>Compulsory element</i>	<b>G</b>	<b>G</b>	<p>Highlands and Islands Enterprise have an <i>Information Security Policy</i> which has been submitted to the Keeper (evidence 21).</p> <p>This policy was last reviewed in 2012.</p> <p>The <i>Information Security Policy</i> is made available on the staff intranet.</p> <p>The individual identified at element 1 is the authority's SIRO.</p> <p>This is supported by a suite of policies, such as a Social Media Policy, that have also been submitted to the Keeper.</p> <p>HIE operates a Risk and Assurance Committee who monitor developments in information security. They report 4 times a year.</p> <p>The Keeper agrees that Highlands and Islands Enterprise has an approved and operational information security policy that is available to appropriate staff.</p>
9. Data	<b>G</b>	<b>G</b>	<p>Highlands and Islands Enterprise have a current data protection policy which has</p>

Protection			<p>been provided to the Keeper as evidence 26.</p> <p>They are registered with the Information Commissioner at: Z6346473</p> <p>Subject Access information for the public appears on their website at: <a href="http://www.hie.co.uk/about-hie/policies-and-publications/privacy-data-protection.html">http://www.hie.co.uk/about-hie/policies-and-publications/privacy-data-protection.html</a> (url provided as evidence 30).</p> <p>Part of the Digital HIE project (<b>see Major HIE Corporate Projects under General Comments below</b>) focuses on ‘how and when we obtain client information and how this is managed thereafter’.</p> <p>HIE provide Data Protection guidance for their staff. A screen shot showing this guidance on the Intranet has been provided to the Keeper (evidence 28).</p> <p>A data sharing workshop has been set up following a review of data protection guidance (RMP page 11).</p> <p><b>Also see Third Parties under General Comments below.</b></p> <p>The Keeper agrees Highlands and Islands Enterprise properly considers its responsibilities under the Data Protection Act 1998.</p>
10. Business Continuity and Vital Records	A	G	<p>Highlands and Islands Enterprise does not currently have an approved and operational Business Continuity Policy.</p> <p>The RMP is accompanied by a letter (evidence 2) from Forbes Duthie, Director of Finance and Corporate Services (<b>see element 1</b>), committing the authority to producing “Business Continuity Policy and Plan.” – Letter dated 4<sup>th</sup> December 2014.</p>

			<p>In a separate e-mail received 6<sup>th</sup> March 2015 HIE state on the subject of Business Continuity: “An improvement model is in place and HIE agrees to forward updates on developments”. The Keeper thanks HIE for this additional commitment.</p> <p><b>The Keeper can agree this element under ‘improvement model’ terms. This means that he is convinced that an authority has identified a gap in provision and has explained the processes they will put in place to close that gap. He agrees this element of the submitted RMP.</b></p>
11. Audit trail	<b>A</b>	<b>G</b>	<p>Highlands and Islands Enterprise have provided the Keeper with staff guidance around version control, naming conventions and using the EDRM.</p> <p>The Keeper has been provided with some of the EDRM guides that are supplied for HIE staff (evidence 11). These include instructions on how to add documents to the system, search for documents and save e-mails to the EDRM. Records held currently on structured drives (procurement is an example given) are linked to the EDRM.</p> <p>The RMP states (page 10) “EDRMS ensures a clear audit trail is recorded, privileges are applied and staff cannot delete records”.</p> <p>There is evidence that version control and naming conventions are in operation in the authority.</p> <p>HIE properly consider e-mail management as part of the control of corporate information.</p> <p>The <i>Information Management Strategy</i> (<b>see under General Comments below</b>) will change the structure of the electronic records systems in HIE. This will, understandably, change the tracking procedures for those records.</p>

			<p>Highlands and Islands Enterprise operates a hybrid system; public records held in paper form are referenced in the EDRM. In the form of Metadata. Thus records can be tracked and retention decisions and 'audit trail' can be imposed on hard-copy records that lie outwith the EDRM.</p> <p>In a separate e-mail received 6<sup>th</sup> March 2015 HIE state on the subject of Audit Trail:</p> <p>"The RMP (page 13) states that currently a minority of staff store information on their (encrypted) staff laptop rather than on EDRMS. The Transforming Information Management approach will in part act as a remedy for this. The Information Management Strategy implementation plan includes measures aimed at changing behaviours and includes the items below</p> <ul style="list-style-type: none"> <li>• EDRMS promotion and training</li> <li>• Change management via communications from Senior Management</li> <li>• Monitoring EDRMS and offline storage</li> <li>• Target support to those who are not changing their behaviour"</li> <li>•</li> </ul> <p>The Keeper thanks HIE for this additional text.</p> <p><b>The Keeper can agree this element under 'improvement model' terms. This means that he is convinced that an authority has identified a gap in provision and has explained the processes they will put in place to close that gap. He agrees this element of the submitted RMP on the understanding that he will be kept up-to-date with developments as the improvement project progresses.</b></p>
12. Competency Framework	<b>G</b>	<b>G</b>	<p>Highlands and Islands Enterprise have provided the Keeper with the job description and business objectives of the individual identified at element 2 (evidence 7 &amp; 8). There is a specific work objective around the submission and implementation of the</p>

<p>for records management staff</p>			<p>RMP. The Keeper is pleased to see this particularly highlighted.</p> <p>The Information and Records Manager’s objectives support the <i>Information Management Strategy</i> (<b>see under General Comments below</b>).</p> <p>They have also supplied similar for the Information and Records Management Officer, who supports the manager.</p> <p>The Records and Information Manager has a responsibility for the delivery of appropriate training to other HIE staff and they have explained the training opportunities they provide for their staff regarding information management (evidence 6).</p> <p>Alex Paterson, CEO of HIE, has prepared a YouTube clip for HIE staff promoting the Transforming Information Management project and encouraging attendance training events relating to the upgraded EDRM (evidence 10). This is excellent evidence of a commitment to improve provision. At the time of the submission of the RMP 80% of staff had attended this training. Guides have also been provided to staff on new information management practices. These have been shared with the Keeper and he thanks HIE for this inclusion.</p> <p>The guides include: Training on the new EDRM (<b>see element 4</b>) including induction training for new starts. This is done as part of ‘Transforming Information Management’ (<b>see Major HIE Corporate Projects under General Comments below</b>). This training will include members of HIE senior management (Leadership Team) in 2015.</p> <p>The Keeper has been provided with some of the EDRM guides that are supplied for HIE staff (evidence 11).</p>
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			<p>File custodians (information asset owners), who have file review responsibility, are trained in this aspect of records management.</p> <p>There is a commitment in the RMP (page 10) to ensure that new staff are made aware of the authority's <i>Information Security Policy</i> (<b>see element 8</b>). It also states "Further training is planned to support the management of the file lifecycle process including security." (also page 10).</p> <p>The Keeper agrees that the individual identified as having day-to-day responsibility for the implementation of the RMP has suitable skills and empowerment. Furthermore, he agrees that Highlands and Islands Enterprise ensure that 'records management' training is made available for appropriate staff.</p>
<p>13. Assessment and Review</p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>It is a requirement of the Public Records (Scotland) Act 2011 that "An authority must— (a) keep its records management plan under review" (PRSA Part 1 5.1.a.).</p> <p>The Head of Corporate Information has committed, in the RMP (page 15), "The Information and Records Manager's (<b>see element 2</b>) time to manage the activities required for undertaking the assessment against each element of the plan". This is a commendable commitment.</p> <p>Review of the RMP is anticipated 18 months after agreement.</p> <p>The EDRMS will be reviewed against a baseline survey conducted in 2013, 'using a formal reporting mechanism'.</p> <p>The RMP (pages 15 and 16) explains in detail the review structures in the authority and the reporting mechanism. This is to be commended.</p> <p>The Business Classification Scheme (file plan) is due for review in 2015. This review will involve the relevant business units. The Keeper commends the principle of</p>

			<p>involving local business areas in reviewing the scheme. The Keeper requests that he informed of any change to the records management provision coming out of this review. He has been supplied with a checklist template to demonstrate how this review will be carried out (evidence 34).</p> <p>The retention schedule (<b>see element 5</b>) is also currently being reviewed.</p> <p>A data sharing workshop has been set up following a review of data protection guidance (RMP page 11).</p> <p>Highlands and Islands Enterprise have a Business Improvement and Internal Audit Team who will monitor the progress of the major projects described in General Comments below. They report directly to the CEO. Their <i>BIIA Schedule of Audits</i>, supplied to the Keeper as evidence 33, includes ‘Information Systems’. The Keeper has been provided with the BIIA self-assessment template to demonstrate the method of review (evidence 36).</p> <p>The Digital HIE Board (<b>see Major HIE Corporate Projects under General Comments below</b>) monitors ‘business transformation’ including relevant policies, such as the data protection policy.</p> <p>The Keeper agrees that Highlands and Islands Enterprise have procedures in place to keep their RMP under review and that they routinely revisit key policy and procedures.</p>
14. Shared Information	<b>A</b>	<b>G</b>	<p>Highland and Islands Enterprise do not currently have an approved and operational data sharing protocol.</p> <p>However, they have provided a letter from Forbes Duthie, Director of Finance and Corporate Services (<b>see element 1</b>), committing the authority to producing “Data</p>

			<p>Sharing protocols and the production of policy, procedures and guidance for staff.” – Letter dated 4<sup>th</sup> December 2014 submitted as evidence 2.</p> <p>Developments of arrangements for data sharing and collaborative working have been identified in the Information management Strategy Action Plan (<b>see <i>Information Management Strategy under General Comments below</i></b>).</p> <p>The development of strategies and protocols for data sharing are a clear ambition for the Digital HIE project (<b>see <i>Major HIE Corporate Projects under General Comments below</i></b>)</p> <p>A data sharing workshop has been set up following a review of data protection guidance (RMP page 11).</p> <p><b>The Keeper can agree this element under ‘improvement model’ terms. This means that he is convinced that an authority has identified a gap in provision and has explained the processes they will put in place to close that gap. He agrees this element of the submitted RMP on the understanding that he will be kept up-to-date with developments as the improvement project progresses. In a separate e-mail dated 6<sup>th</sup> March 2015 HIE has agreed to do this.</b></p>
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**Version**

This assessment is on the version of the Records Management Plan dated ‘December 2014’. HIE utilise a coded version system. The RMP has a unique identity: A2264191. The Author of the RMP is Jennifer Boyle, Information and Records Manager (**see element 2**).

The RMP was approved by the IGG (**see below**) on 25<sup>th</sup> November 2014. The review date is not clear (**see element 13**).

The RMP 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>.

HIE make the following statement: "Where new versions of policy documents are requested these HIE agree to forward these to the NRS in order to keep HIE's submission up-to-date". The Keeper thanks HIE for this commitment.

### **Information Governance Group (IGG)**

This group, chaired by the Director of Finance and Corporate Services (**see element 1**), owns the *Information Management Strategy* (**see below**). It has approved the submission of the HIE RMP. The remit of the group has been explained to the Keeper (evidence 3). Minutes from an IGG meeting have been provided (evidence 32). Jennifer Boyle, Information and Records Manager (**see element 2**), sits on this group. The Information Governance Group's scrutiny role and reporting schedule is explained in the RMP (page 15).

### **Information Management Strategy**

The *Information Management Strategy* document has been provided to the Keeper (evidence 4) and represents a core support for the RMP. This strategy document and action plan is managed by the Information Governance Group (**see above**) which is chaired by the Director of Finance and Corporate Services (**see element 1**). The strategy was approved in August 2014. It was created by Jennifer Boyle, Information and Records Manager. (**see element 2**). Her objectives support the *Information Management Strategy* and her line manager, the Head of Corporate Information, leads on the implementation of the *Strategy*.

### **Third Parties**

HIE contracts out some of its functions to third parties 'specialist advice to clients' is an example given. Information management requirements are specified at time of contract and samples of Invitation to Tender, Agreements and 'Terms and Conditions' have been sent to the Keeper. Although these samples do not appear to mention PRSA specifically, there is clear evidence in several clauses that records governance has been considered, particularly around FOI and Data Protection requirements.

### **Major HIE Corporate Projects**

As well as the work undertaken under PRSA, considerations around records management provision play a part in several projects HIE are currently progressing. These include

**Transforming Information Management** (staff training on this has been shared with Keeper – evidence 5). Alex Paterson, CEO of HIE, has prepared a YouTube clip for HIE staff promoting the Transforming Information Management project and encouraging attendance training events relating to the upgraded EDRM. This is excellent evidence of a commitment to improve provision.

**Digital HIE** (ambition strategy and action plan provided to the Keeper as evidence 23 and 24). This is a strategy to ensure that the business improvements planned by HIE are supported by ‘digital’. “Our vision under the Digital HIE ambition strategy is that HIE will ‘build a world-class environment which inspires innovation and transforms access to information and knowledge”. Digital HIE is further explained in the RMP (page 10). The Digital HIE Board’s scrutiny role and reporting schedule is explained in the RMP (page 15). Digital HIE supports the Scottish Government’s *Scotland’s Digital Future: Delivery of Public Services* strategy.

**Office of the 21<sup>st</sup> Century**. This project refers to the ‘internal information systems infrastructure’ on which electronic records are housed. This is a technical project to deliver Digital HIE.

These projects support a single strategic approach to business improvements in the authority based around their ‘**CREATIVE Vision**’ statement. The RMP demonstrates CREATIVE on page 3.

Evidence has been supplied that HIE involve staff in business units in developing these projects (evidence 5).

These projects have been explained to the Keeper in the RMP and in the accompanying evidence package.

**The Keeper agrees that these projects are complimentary and strongly support a culture that values records as an asset. He will be interested in receiving updates on progress when appropriate.**

## 6. Keeper's Summary

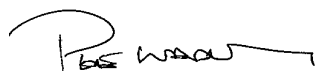
Elements 1 - 14 that the Keeper considers should be in a public authority records management plan have been properly considered by Highlands and Islands Enterprise. Policies and governance structures are in place to implement the actions required by the plan.

## 7. Keeper's Determination

Based on the assessment process detailed above, the Keeper **agrees** the RMP of **Highlands and Islands Enterprise**.

- The Keeper recommends that Highlands and Islands Enterprise 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

Either

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 Highlands and Islands Enterprise. In agreeing this RMP, the Keeper expects Highlands and Islands Enterprise to fully implement the agreed RMP and meet its obligations under the Act.



.....

**Tim Ellis**

Keeper of the Records of Scotland