

Public Records (Scotland) Act 2011

TS Prestwick Holdco Ltd (registered number SC462050)

The Keeper of the Records of Scotland

4th October 2018

Contents

1. Public Records (Scotland) Act 2011 3
2. Executive Summary 4
3. Authority Background 4
4. Assessment Process 5
5. Model Plan Elements: Checklist 6
6. Keeper’s Summary29
7. Keeper’s Determination29
8. Keeper’s Endorsement..... 30

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 TS Prestwick Holdco Ltd (registered number SC462050) by the Public Records (Scotland) Act 2011 Assessment Team following its submission to the Keeper on 28th February 2018.

The assessment considered whether the RMP of TS Prestwick Holdco Ltd was developed with proper regard to the 14 elements of the Keeper's statutory Model Records Management Plan (the Model Plan) under section 8(3) of the Act, and whether in this respect it complies with it and the specific requirements of the Act.

The outcome of the assessment and the Keeper's decision on whether the RMP of TS Prestwick Holdco Ltd (registered number SC462050) complies with the Act can be found under section 7 of this report with relevant recommendations.

3. Authority Background

Prestwick Aviation Holdings Limited is an active company incorporated on 21 March 1991. The airport is owned by the Scottish Government, but has a core objective to return the business to private ownership with a sustainable future as an airport.

Their Strategic Plan can be found here:

http://www.glasgowprestwick.com/wp-content/uploads/2017/06/GPA_Strat_Plan_16_AW3_Online_SinglePages.pdf

<http://www.glasgowprestwick.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 TS Prestwick Holdco Ltd.'s RMP was developed with proper regard to the elements of the Model Plan and is compliant with the Act. The assessment also considered whether there was sufficient supporting evidence of such compliance.

Key:

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

TS Prestwick Holdco Ltd (registered number SC462050)

For simplicity, this authority is described as ‘PAHL’ (Prestwick Aviation Holdings Limited) in the assessment below

Element	Present	Evidence	Notes
1. Senior Officer <i>Compulsory element</i>	G	G	<p>TS Prestwick Holdco Ltd (registered number SC462050) (PAHL) have identified, Stewart Adams, Chief Executive Officer, as the individual with overall responsibility for records management in the authority.</p> <p>This is confirmed by a <i>Covering Letter</i> from Mr. Adams dated 28th February 2018.</p> <p>The Chief Executive is identified as having overall strategic responsibility in the <i>Freedom of Information & Environmental Information Requests Policy</i> (section 19).</p> <p>The Keeper agrees that PAHL have identified an appropriate individual to this role as required by the Public Records (Scotland) Act 2011 (the Act).</p>
2. Records Manager <i>Compulsory element</i>	G	G	<p>The <i>Plan</i> identifies Annette Greening, Data Protection and Information Manager, as having day-to-day operational responsibility for records management within PAHL.</p> <p>This is confirmed by a <i>Covering Letter</i> from Mr. Adams (see element 1) dated 28th February 2018. Mr Adams confirms that “Annette will have day-to-day responsibility for our compliance with Data Protection, Records Management and taking forward</p>

			<p>the areas for improvement identified in our Records Management Plan.” (<i>CEO’s Covering Letter</i>).</p> <p>Ms. Greening’s responsibility to this role is made clear in the <i>Job Description Data Protection & Information Manager</i> (see element 12) and the <i>Annette Greening Objectives</i> document both of which have been shared with the Keeper. This latter includes the objective: “Create and implement a development programme to educate all employees on the importance of being GDPR compliant and to ensure they have appropriate knowledge and skills to take Information security forward. Implement and cascade Company Records Management Policy and Procedures to ensure consistency across the business.”</p> <p>Ms. Greening has a direct line to the Chief Executive Officer (see element 1).</p> <p>Ms. Greening has a formal responsibility: To implement, maintain, monitor and review GPA’s Records Management Plan and associated guidance, policies and procedures.</p> <p>To promote good records management and raise awareness of records management issues</p> <p>To develop and deliver training in records management (see element 12).</p> <p>To advise on retention and disposal periods and establish schedules (see element 5).</p> <p>The authority’s <i>Records Management Policy</i> states at section 4.3: “Data Protection and Information Manager: shall provide advice and support to all services throughout Glasgow Prestwick Airport relating to records management, ensuring compliance with legal guidance.”</p>
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			<p>The Data Protection and Information Manager is the Airport’s registered Data Protection Officer (see element 9). As such she is responsible, among many other things, for giving advice regarding data protection impact assessments (<i>Data Impact Assessment Policy</i> – see element 9 – section 9). This appointment is confirmed in the <i>Data Protection Policy</i> (section 18).</p> <p>The Data Protection and Information Manager is the Airport’s Freedom of Information Officer. This is confirmed by the <i>Freedom of Information & Environmental Information Requests Policy</i> (section 5). It is her responsibility to identify EIR requests (a particular issue considering the nature of this public authority’s business) and to offer advice.</p> <p>Ms. Greening is the author and ‘owner’ of the <i>Records Management Policy</i>; the <i>Information Asset Owners Standards</i> (for both see element 3); the <i>Data Protection Policy</i>; the <i>Subject Request Policy</i>; the <i>Data Impact Assessment Policy</i> (for all see element 9); the <i>Third Party Policy</i>; the <i>Data Handling Policy</i> and the <i>Freedom of Information & Environmental Information Requests Policy</i>. She has “direct responsibility for maintaining [information governance policies] and providing advice on implementation.”</p> <p>Considering the above, the Keeper agrees that Ms Greening has a detailed knowledge of the records management provision in the authority.</p> <p>The Keeper agrees that PAHL have 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>PAHL have a <i>Records Management Policy</i> which has been provided to the Keeper. This is version 1 and appears in the authority’s <i>Information Governance Manual</i>.</p>

			<p>The Keeper has been provided with a screen-shot from the PAHL intranet which shows that staff can access the <i>Information Governance Manual</i> sections (including the <i>Records Management Policy</i>).</p> <p>Policies under the <i>Information Governance Manual</i> also include: The <i>Data Protection Policy</i> (see element 9) The <i>Data Handling Policy</i> (see element 9 and below) The <i>Data Impact Assessment Policy</i> (see element 9) The <i>Subject Access Request Policy</i> (see element 9) The <i>Third Party Policy</i> (see element 14) The <i>Freedom of Information and Environmental Request Policy</i> (see below) The <i>Subject Request Procedures</i> The <i>Data Breach Response Policy</i> The <i>Data Privacy CCTV Policy</i> The <i>Data Protection Risk Management Policy</i></p> <p>The Keeper commends the principle of assembling diverse information governance policies in a single intranet area and 'manual'. This should create a stronger business tool for PAHL.</p> <p>The <i>Records Management Policy</i> fulfils a commitment to a 'policy statement' that appears in the <i>Covering Letter</i> from Stewart Adams, Chief Executive Officer.</p> <p>The <i>Plan</i> features an 'action' to "Develop a Company Records Management Policy" with a target date of May 2018. The Keeper agrees this action is now complete.</p> <p>The <i>Records Management Policy</i> includes the authority's <i>Retention Schedule</i> (see element 5).</p> <p>The Keeper has been provided with the PAHL <i>Data Handling Policy</i> (also part of the</p>
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			<p><i>Information Governance Manual</i> business tool). This is version 1 issued June 2018. This policy supports information security and data protection aspirations in the authority (see elements 8 and 9) and is to be commended.</p> <p>The Keeper has been provided with the PAHL <i>Freedom of Information & Environmental Information Requests Policy</i>. This version 1 issued May 2018. The authority's publication scheme is available at: https://www.glasgowprestwick.com/wp-content/uploads/2017/11/PAHL-publication-scheme-Nov-2017.pdf</p> <p>How to make a freedom of information enquiry is also a feature of the website at: https://www.glasgowprestwick.com/corporate/about-us/publication-scheme-and-freedom-of-information/</p> <p>The Keeper has been provided with the guidance document <i>Information Asset Owners Standards</i> (see Information Asset Owners under General Comments below).</p> <p>The Keeper agrees that the submitted <i>Plan</i> supports the objectives stated in the various policy documents he has seen.</p> <p>The <i>Records Management Policy</i> is not currently available on-line. The Keeper notes that in their <i>Publication Scheme</i> PAHL suggest that some documentation connected to PRSA and the <i>Records Management Plan</i> may be added. The Keeper would suggest that the <i>Records Management Policy</i> should be considered for publication. This is particularly relevant as the inclusion of the authority's retention schedule would help inform what record types may be available, or should have been destroyed. This may assist those considering submitting a Freedom of Information Request.</p> <p>The Keeper agrees that PAHL have a records management policy statement as</p>
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			required by the Act.
4. Business Classification	A	G	<p>PAHL operate a hybrid paper/electronic public record system.</p> <p>With the introduction of the requirements of the General Data Protection Regulation (GDPR) in May 2018 in mind, PAHL conducted a records review focused on records containing personal information. They used this to create a '<i>Data Asset Inventory</i>'. This inventory has been provided to the Keeper.</p> <p>This review, and a further one directed on the corporate records that do not contain personal information, will be used to create a file plan/business classification scheme showing the breadth of records held in the various systems operated by PAHL.</p> <p>The <i>Plan</i> makes the following commitments:</p> <p><u>Regarding the <i>Data Asset Inventory</i></u>: "This is the first step to creating a business classification scheme, which will include personal as well as corporate information." The Keeper acknowledges that PAHL have recognised that records not covered by GDPR must still be managed effectively.</p> <p><u>Regarding future actions</u>: "The next stage will be to conduct a similar exercise for corporate information, to inform and finalise our business classification scheme." And "We will develop a Business Classification Scheme which identifies and describes our core functions, component activities and associated transactions covering both personal and corporate information." There is a target date for this of October 2019.</p> <p>The Keeper agrees these actions.</p>

			<p>The Keeper welcomes the identification of Information Asset Owners (see under General Comments below) the development of an Information Asset Register (file plan/business classification). It is not clear yet whether PAHL will take this approach.</p> <p>The Keeper agrees this element under ‘improvement model terms’. It is clear that the authority has recognised a gap in provision and has committed to actions liable to close that gap. The Keeper’s agreement is conditional on him being updated on progress.</p>
5. Retention schedule	A	G	<p>It is a requirement of the PAHL <i>Records Management Policy</i> that the authority “that there are consistent and documented retention and disposal procedures.”</p> <p>To this end, the Policy contains a business-wide retention schedule. This lists record type, retention decision, notes and any relevant legislation. For example: Records of Tests & Examination (Chemical); 5 years from date tests were carried out; Records of examinations & tests of control systems and protective equipment; Control of Substances Hazardous to Health Regulation (COSHH) 2002.</p> <p>For retention decisions, PAHL adapted the Scottish Council on Archives Records Retention Schedules. The SCARRS model has been generally endorsed by the Keeper as being suitable (with appropriate adaptation) for use by Scottish public authorities.</p> <p>However, the <i>Plan</i> states: “...there is still a significant amount of work required to provide clear guidance and instruction on retention and deletion of both electronic data and hard copy documents.” This is a clear identification of a gap in provision.</p> <p>The Keeper recognises that PAHL are currently implementing a project to</p>

			<p>implement retention decisions throughout the organisation. The roll out and adoption of these schedule is programmed to be complete by December 2021. The Keeper agrees that these are reasonable timescales particularly as other aspects of the authority’s records management provision will be developing at the same time (see element 4).</p> <p>The Keeper notes that some business areas in PAHL already operate robust retention procedures, such as the HR and Finance Departments. It is suggested that the good work evidenced in these business areas can act as a template for others going forward. This is evidenced by the inclusion of documentation around the “recently completed cleanse of electronic data” – provided.</p> <p>Each individual department, with the supervision of the relevant Information Asset Owner (see under General Comments below), applies the retention decisions for their own record series. The Data Protection and Information Manager (see element 2) is available for advice and guidance with regard to this work.</p> <p>The maintenance of a retention schedule is supported by the PAHL <i>Records Management Policy</i> for example section 6.3, by the <i>Information Asset Owners Standards</i> and by the <i>Data Handling Policy</i> for example sections 19 and 21(for both policies see element 3 for the Standards see Information Asset Owners under General Comments below).</p> <p>The Keeper agrees this element of the PAHL <i>Plan</i> on ‘Improvement Model’ terms. This means that the authority has clearly identified a gap in their records management provision (see guidance and instruction quote above). They have also committed to a project to close that gap and set reasonable timescales for the completion of that project.</p>
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<p>6. Destruction Arrangements <i>Compulsory element</i></p>	<p>A</p>	<p>G</p>	<p>It is a requirement of the PAHL <i>Records Management Policy</i> that the authority “that there are consistent and documented retention and disposal procedures.” (<i>Policy</i> section 2)</p> <p>With this in mind, PAHL routinely, securely and irreversibly destroy hard-copy public records using a third-party disposal company. Evidence has been supplied to the Keeper showing that this arrangement is operational. The procedure for the destruction of paper records is supported by the PAHL <i>Records Management Policy</i> for example section 6.3 and by the <i>Data Handling Policy</i> for example section 23 (for both policies see element 3).</p> <p>Regarding public records held digitally PAHL note in their <i>Plan</i> that “We have identified a more robust and reliable process is needed. We will need to introduce naming conventions for electronic data [See also element 11] that will enable identification and required destruction at the appropriate time...”</p> <p>The controlled and timely disposal of electronic records held on shared drives is a problem for many Scottish public authorities and the Keeper accepts and commends the identification of the issue at PAHL. He agrees that until records are properly ‘filed’ using standard naming conventions it is hard to monitor the controlled destruction of record series when prompted to do so by a retention schedule. The Keeper requires that a copy of the naming convention guidance is submitted by PAHL when available.</p> <p>PAHL state “...detailed destruction arrangements will be included for both electronic and hard copy documents in our Retention Schedules when complete.” And commit in the action plan against this element to “Research, produce and implement an electronic file naming convention directly linked to our Retention Schedule.” The Keeper agrees these actions and notes a target date of December 2021 coinciding with the operational implantation of the <i>Retention Schedules</i> (see element 5). The</p>
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			<p>Keeper commends the authority for specifying timescales.</p> <p>The Keeper also notes that a separate line-of-business system is being developed for the authority’s Finance and Personnel business areas. This system should automate and control destruction of the electronic records created by those departments.</p> <p>The systematic destruction of electronic records is supported by the PAHL <i>Data Handling Policy</i> (see element 3) for example section 24.</p> <p>PAHL, quite correctly, keep back-up copies of public records for business continuity purposes (see element 10). It is important that the records management team can be confident regarding the length of time back-up copies remain available. PAHL has explained the back-up cycle to the Keeper and he agrees that the authority is clear about the availability of back-ups and about the rationale for keeping back-ups for the length of time they do.</p> <p>PAHL’s in-house IT department routinely, securely and irreversibly destroy hardware as explained in the <i>Technology Equipment Disposal Policy</i>. This policy has been provided to the Keeper. It is version 1.0 dated April 2018 and includes an explanation of how “special tools” are used by the Glasgow Prestwick Airport IT department to ensure the irretrievable destruction of records held on media such as laptops, tablets and peripherals.</p> <p>The systematic removal of records from obsolete hardware is supported by the PAHL <i>Data Handling Policy</i> (see element 3) for example section 30.</p> <p>The Keeper is able to agree this element of the PAHL <i>Plan</i> under ‘Improvement Model’ terms. This means that the authority has clearly identified a gap in their records management provision (see electronic record</p>
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			management quote above). They have also committed to a project to close that gap and set reasonable timescales for the completion of that project.
7. Archiving and Transfer <i>Compulsory element</i>	A	G	<p>The Records Management Policy (see element 3) indicates that the authority recognises records as fundamental to the “corporate memory” (<i>Policy</i> section 1.0).</p> <p>PAHL 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 PAHL to NRS is being negotiated at the time of this assessment. This is confirmed by the NRS Client Management Team. Presently, there is a delay in making MoUs with NRS available to public authorities. The Keeper therefore acknowledges that PAHL are as compliant on this element as is currently possible.</p> <p>The Keeper agrees these arrangements are supportive of the authority’s statement in the <i>Plan</i> – for example, the introduction explains that it applies to records throughout their lifecycle including possible archiving.</p> <p>The Keeper notes that PAHL have set a target to the identification of records suitable for transfer of 2019.</p> <p>The Keeper agrees this element of PAHL’s <i>Records Management Plan</i> 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 working to close that gap. The Keeper’s agreement is conditional on an MoU being concluded and a copy being provided.</p>
8. Information	G	G	“It is the policy of Glasgow Prestwick Airport to ensure that all data shall be

<p>Security <i>Compulsory</i> <i>element</i></p>			<p>protected in proportion to the sensitivity of the data, and in line with all legal and regulatory requirements.” (<i>Data Protection Policy</i> - see element 9 – section 6 and <i>Data Handling Policy</i> also section 6). This is supported by the <i>Records Management Policy</i> – see element 3 - (section 2): “Glasgow Prestwick Airport shall ensure that records will be secure from unauthorised or inadvertent alteration or erasure. Access and disclosure will be properly controlled and audit trails will be in place to track all changes. Records and the systems in which they are held will be in a robust format.” (see also <i>Policy</i> section 6.2)</p> <p>PAHL have a suite of information security policies which have been provided to the Keeper.</p> <p>These include guidance such as their <i>Office Etiquette</i> document which includes advice such as: “as keep your workspace tidy, free of debris and clutter, if possible paperwork should be kept in a lockable cupboard”. There is a section on Confidential Information and Intellectual Property in the corporate computer use guidance.</p> <p>PAHL have recently reviewed policies directly linked to the security of information and several have just received formal ratification and have been published to staff. For example the <i>Remote Access Policy</i> has now been provided to the Keeper. This is version 1.0 dated May 2018.</p> <p>The <i>Plan</i> explains the arrangements for the security of hard-copy public records. The Keeper agrees these arrangements.</p> <p>PAHL was awarded The Cyber Essentials Certificate of Assurance (provided) in 2017.</p>
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			<p>Staff report security incidents by following the procedures available in their <i>Data Breach Response Policy</i>. The Keeper has been provided with a screen-shot showing how PAHL staff access this guidance. If appropriate can a copy of this guidance be forwarded to the Keeper in order to keep the PAHL submission up-to-date?</p> <p>Information Asset Owners (see under General Comments below) have a responsibility for “Escalating any breaches and issues that arise within their Department”</p> <p>PAHL have provided screen-shots showing that staff can access other information security policy and guidance documents and training.</p> <p>The Keeper notes that he has seen the PAHL <i>Third Party Policy</i> used when sharing records with service providers. This is version 1 issued June 2018. He agrees that this policy includes clauses designed to protect records shared with third parties.</p> <p>The Keeper agrees that PAHL 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>PAHL have a <i>Data Protection Policy</i> which has been shared with the Keeper. This is version 1 issued to staff on 5th June 2018.</p> <p>This policy forms part of the <i>Information Governance Manual</i> which can be accessed through the authority’s intranet. The Keeper has been provided with a screen-shot showing staff access to the <i>Manual</i> (see element 3 above).</p> <p>The Data Protection and Information Manager (see element 2) is the Airports registered Data Protection Officer.</p>

			<p>The <i>Data Protection Policy</i> explains the six principles of data protection.</p> <p>PAHL have provided screen-shots showing that staff can access the <i>Information Governance Manual (see element 3)</i> which contains the <i>Data Protection Policy</i>.</p> <p>Information about Freedom of Information appears on the Prestwick Airport website: http://www.glasgowprestwick.com/corporate/about-us/publication-scheme-and-freedom-of-information/</p> <p>And the airport’s Privacy Policy: https://www.glasgowprestwick.com/privacy-policy/ Which contains subject access information under “How you can access and update your information”.</p> <p>The Keeper has been provided with staff guidance on responding to subject access requests in the form of the PAHL <i>Subject Request Policy</i> – June 2018 version 1.</p> <p>The Keeper has been provided with the PAHL <i>Data Handling Policy</i> (also part of the <i>Information Governance Manual</i> business tool – see element 3). This policy supports information security and data protection aspirations in the authority and is to be commended.</p> <p>The Keeper has also been provided with the PAHL <i>Data Impact Assessment Policy</i> – June 2018 version 1.</p> <p>The Keeper notes that he has seen the PAHL <i>Third Party Policy</i> used when sharing records with service providers. This is version 1 issued June 2018. He agrees that this policy includes clauses designed to protect personal data processed by third parties.</p> <p>The Keeper acknowledges that he has seen the PAHL <i>Data Flow Diagram</i> for their</p>
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			<p>HR Department.</p> <p>PAHL have a Data Protection Committee.</p> <p>The Keeper recognises that PAHL have employed a consultant to carry-out a “health check” on data protection compliance. The Keeper commends this action.</p> <p>The Keeper agrees that PAHL have properly considered their responsibilities under the Data Protection Act 2018.</p>
<p>10. Business Continuity and Vital Records</p>	<p>A</p>	<p>G</p>	<p>PAHL has a Business Continuity Plan (BCP) in the form of a manual which sets out how the organisation should respond to emergencies. The BCP was approved by the Assurance Manager. This has been provided to the Keeper – version dated 11 July 2017. This manual is supported by departmental business continuity plans. A template departmental plan has been provided (also July 2017).</p> <p>However, PAHL recognise that these local arrangements are not currently considered to be offering the degree of record recovery provision required. PAHL state (Plan element 10): “we are currently consulting with the Scottish Business Resilience Centre to agree new, updated templates for issue to Departmental Managers for completion. These templates will include plans for recovery of both paper and electronic documents.” This action is supported by a future development: “All Departmental Business Continuity Plans to be updated using new template – will include plans for recovery of both paper and electronic documents.” With a December 2019 target date. The Keeper agrees this action.</p> <p>Each business area in PAHL is responsible for updating a <i>Risk Register</i> which can be flagged up to the authority’s Risk Assurance Committee who report to the Board.</p>

	A	G	<p>The Keeper notes that certain areas of PAHL, such as Security, have stronger business continuity arrangements than others. It is expected that the good practice already evident in the authority will be extended throughout by the development of the templates mentioned above.</p> <p>PAHL have provided a screen-shot showing that staff can access departmental business continuity manuals.</p> <p>The Airport's Safety Manager has confirmed by e-mail that. "I can confirm that Element 10: Business Continuity & Vital Records and Element 13: Assessment & Review will form part of the Airport's internal audit programme as part of the regulatory compliance to have a formal Compliance Monitoring System (CMS) in place. The CMS will be a rolling 3-yearly programme and will commence from January 2019."</p> <p>It is clear that the authority understands its obligation under this element.</p> <p>The Keeper agrees this element of the PAHL <i>Plan</i> under 'improvement model' terms. This means that he accepts that, having identified a gap in provision, an authority has committed to a process to close that gap. In this case, PAHL are developing new business continuity templates that will include the recovery of public records. The Keeper's agreement is conditional on his being updated as this project progresses.</p>
11. Audit trail	A	G	<p>See elements 4 and 5 above.</p> <p>It is the policy of PAHL that: records and the information within them can be effectively retrieved by those with a right of access. (<i>Records Management Policy – see element 3 - section 2</i>) and "...records must be accurate, complete, accessible and robust for as long as the records retention schedule requires." (<i>Policy section</i></p>

			<p>6.1 – see also 6.2). Accessibility requires that records can be effectively tracked within record-keeping systems.</p> <p>For certain business applications and key document types records are managed by imposed audit trails. There are clearly business areas within the authority where close management of the movement of records over time is necessary to guarantee their authenticity and meet professional and industry standards. However, it appears that the ability to efficiently locate the correct version of public records is not comprehensive within PAHL.</p> <p>PAHL have recognised this represents a gap in provision and state (<i>Plan</i> element 11): “PAHL does need to undertake some work in this area to ensure all records are part of a system that provides a full audit trail. We need to establish if any documents (hard copy and electronic) are currently held outwith our existing document audit systems and if so, make sure action is taken to comply with this requirement.” and “On completion of our Personal Data Asset Inventory, Corporate Data Asset Inventory and Business Classification Scheme [see element 4] we will review all documents held to ensure there is a robust system in place that provides a clear audit trail of changes made.” This action is supported by a future development: “Review all documents held to ensure there is a clear audit trail of changes made.” With a target date of December 2020. The Keeper agrees this action.</p> <p>A commitment under element 6 of the <i>Plan</i> “We will establish and introduce an electronic file naming convention.” This will be vital for the efficient tracking of documents on shared drives and the Keeper agrees this action.</p> <p>The Keeper agrees this element of PAHL’s <i>Plan</i> under ‘improvement model’ terms. This means that he accepts that, having identified a gap in provision, an authority has committed to a process to close that gap. In this case, PAHL</p>
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			<p>are reviewing tracking provision in line with the major developments described in elements 4 and 5 above. The Keeper’s agreement is conditional on his being updated as this project progresses.</p>
<p>12. Competency Framework for records management staff</p>	<p>G</p>	<p>G</p>	<p>Ms. Greening’s responsibility for implementing the plan is strongly supported by statements in a <i>Covering Letter</i> from Stewart Adams, Chief Executive Officer (see element 1) dated 28th February 2018 and by the Records Management Policy (see element 3).</p> <p>PAHL have also provided the <i>Job Description Data Protection & Information Manager</i> which shows that Ms. Greening has a specific ‘Key Accountability’ “ To lead on the implementation of GPA’s [Glasgow Prestwick Airport] Records Management Plan”. The Keeper has also seen Ms Greening’s personal objectives which include: “Continue to liaise and participate with National Records Scotland and attend any relevant workshops/events with regard to Data Protection and Records Management.”</p> <p>The Keeper therefore agrees that development opportunities are made available to Ms. Greening. He is particularly keen to endorse training and professional development opportunities for the person named under No 2 of an authority’s records management plan.</p> <p>PAHL has corporate membership of the Information and Records Management Society.</p> <p>It is the Policy of PAHL that: “all relevant Glasgow Prestwick Airport employees are made aware of record keeping responsibilities through training programmes and guidance.” (<i>Records Management Policy</i> section 2 – see also section 7). Information Governance Notices are sent out to employees to inform, advise and support them on all relevant aspects or changes within Information Governance.</p>

	G	G	<p>This is done in order to promote a strong Data Security Awareness and Records Management culture.</p> <p>PAHL have provided details of staff training in data protection including a “Data Protection and Information Awareness” presentation and a “ICT and Cyber Security Training” which now form part of the authority’s induction process. The Keeper thanks PAHL for sharing this.</p> <p>The Keeper notes that PAHL state in the <i>Plan</i>: “...we recognise more in-depth training is also required on Records Management – the content, duration and timing of which will dependent on the job role.” To this end, the Plan features an action to “Provide training for all employees on Records Management” with a target date of October 2019. This is confirmed under element 9 of the <i>Plan</i>.</p> <p>PAHL have provided screen-shots showing that staff can access information governance policy and guidance documents and training. Vital communications can be issued to staff through a ‘Read & Sign’ process which provides evidence of staff engagement.</p> <p>The Keeper agrees that the individual has the appropriate skills and clear responsibility to carry out her role. Furthermore, he agrees that PAHL considers information governance training for its staff as appropriate.</p>
<p>13. Assessment and Review</p>	G	G	<p>The Public Records Act 2011 requires scheduled public authorities to “keep its records management plan under review” (part 1 5.1 (a)).</p> <p>This is also the policy of PAHL who state in their <i>Records Management Policy</i> (section 2): “that Glasgow Prestwick Airport shall ensure record management procedures are regularly monitored and reviewed, and action taken to improve as necessary.”</p>

			<p>The Keeper notes that, GDPR specific but very useful, review work has been recently done by this authority. This work (health check) led to the development of an action plan. The Keeper commends this.</p> <p>The Authority is widening this review and the resulting action plan to take in all public records.</p> <p>The implementation of the <i>Plan</i> will be reviewed quarterly by the Data Protection and Information Manager (see element 2). This is confirmed in her <i>Job Description</i>: “To implement, maintain, monitor and review GPA’s [PAHL] Records Management Plan...”</p> <p>The implementation of the Plan will also be reviewed annually by the authority’s Internal Audit team. This is likely to be done for certain selected elements of the <i>Plan</i>. The Keeper has seen written confirmation of this arrangement and agrees that all 14 elements would not have to be subject to Internal Audit review at once.</p> <p>All policy documents submitted by PAHL, with the exception of the Remote Access Policy and the Technology Equipment Disposal Policy, have annual review dates and those reviews are the responsibility of the Data Protection and Information Manager (see element 2). Utilisation of the authority’s internal audit facility is also supported (every 3 years). This is to be commended.</p> <p>The Keeper agrees that PAHL have arrangements in place to review their <i>Records Management Plan</i> as required by the Act. They have explained when this review will take place and who is responsible for the work. Furthermore the Keeper agrees that supporting policies and guidance have also been allocated review periods.</p>
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14. Shared Information	N/A	N/A	<p>In discussion with PAHL, the Keeper agrees that the authority does not undertake systematic data sharing with other organisations.</p> <p>However, they have made a commitment under this element that they will “develop Data Sharing Agreements where appropriate” thus evidencing that they understand the potential value of formal agreements should the need for regular information sharing become a necessary part of fulfilling their functions.</p> <p>The Keeper notes that he has seen the PAHL <i>Third Party Policy</i> used when sharing records with service providers. This is version 1 issued June 2018.</p>
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General Notes on RMP, Including Concerns:

TS Prestwick Holdco Ltd (registered number SC462050)

For simplicity, this authority is described as ‘PAHL’ (Prestwick Aviation Holdings Limited) in the assessment below

General Notes on RMP, Including Concerns:

This assessment is on the *Records Management Plan* (the *Plan*) of TS Prestwick Holdco Ltd (registered number SC462050) (PAHL) version 1.0 February 2018 and submitted to the Keeper of the Records of Scotland for agreement on 9th March 2018.

The *Plan* is accompanied by a *Covering Letter* from Stewart Adams, Chief Executive Officer in the authority. The *Letter* endorses the records management policy of the authority (**see element 3**) and explains the steps already taken towards improving PAHL’s records

management provision. He also clearly delegates responsibility for the implementation of the plan to the Data Protection and Information Manager (**see element 2**). In his *Covering Letter* Mr. Adams states: “Good records management also support and enables achievement of our key Strategic Objective of being Continually Compliant and Staying Safe, Secure and Sustainable. This will be achieved by the appropriate use of technology and the management of information, records and archives using both electronic and paper systems.” The Keeper fully agrees with this statement.

Each element of the *Plan* is accompanied by actions to be pursued regarding that element along with target dates for the completion of these actions. The *Plan* is generally indicative of an open and honest approach to regarding gaps in provision. The Keeper commends this.

The authority identifies records as a business asset (for example *Records Management Policy* section 1.0). The Keeper commends this recognition.

The *Plan* states (Introduction 1.3): “The plan is agreed with the Keeper of Records of Scotland (the Keeper) and will be reviewed by PAHL quarterly and updates given to the Keeper annually.” The Keeper thanks PAHL for this commitment.

The *Plan* 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>.

Third Parties:

The Act makes it clear that records created by a contractor in carrying out a scheduled authority’s functions are public records (Part 1 section 3.1 (b)).

PAHL state (Plan Element 4): “All services are performed in-house. We do not contract out any of our functions.”

Information Asset Owners

PAHL have a network of Information Asset Owners responsible for record sets in their business areas. The Keeper has been provided with the guidance document *Information Asset Owners Standards*. This is version 1 issued March 2018. Information Asset Owners are required to develop a knowledge of key information governance issues particularly around data protection and information security. The Standards explains the key tasks of an Information Asset Owner which include:

Understanding their Departmental assets and providing assistance with data mapping where required

Providing assistance to the Data Protection and Information Manager in maintaining the information asset register or data asset inventory

Checking that security requirements are adhered to

Information Asset Owners are responsible for ensuring that applicable data protection impact assessments are carried out in their business areas and to update the Data Protection and Information Manager **(see element 2)**.

The use of local records 'champions' is commended by the Keeper.

6. Keeper's Summary

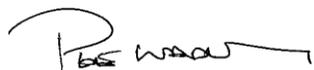
Elements **1 – 14** that the Keeper considers should be in a public authority records management plan have been properly considered by TS Prestwick Holdco Ltd (registered number SC462050). Policies and governance structures are in place to implement the actions required by the plan.

7. Keeper's Determination

Based on the assessment process detailed above, the Keeper **agrees** the RMP of TS Prestwick Holdco Ltd (registered number SC462050).

- The Keeper recommends that TS Prestwick Holdco Ltd should publish its agreed RMP as an example of good practice within the authority and the sector.

This report follows the Keeper's assessment carried out by,



.....
Pete Wadley
Public Records Officer



.....
Robert Fotheringham
Public Records Officer

8. Endorsement of Report by the Keeper of the Records of Scotland

The report has been examined and is endorsed under the signature of the Keeper of the Records of Scotland as proof of compliance under section 1 of the Public Records (Scotland) Act 2011, and confirms formal agreement by the Keeper of the RMP as submitted by TS Prestwick Holdco Ltd (registered number SC462050). In agreeing this RMP, the Keeper expects TS Prestwick Holdco Ltd to fully implement the agreed RMP and meet its obligations under the Act.

A handwritten signature in cursive script that reads "Laura Mitchell".

Laura Mitchell

Deputy Keeper of the Records of Scotland