

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

**Scottish Forestry**

**The Keeper of the Records of Scotland**

**9<sup>th</sup> December 2021**

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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 Scottish Forestry by the Public Records (Scotland) Act 2011 Assessment Team following its submission to the Keeper on 11 November 2020.

The assessment considered whether the RMP of Scottish Forestry was developed with proper regard to the 15 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 Scottish Forestry complies with the Act can be found under section 7 of this report with relevant recommendations.

## 3. Authority Background

Scottish Forestry are the Scottish Government agency responsible for forestry policy, regulation, grants incentives, technical forestry advice and new cross-border arrangements. The authority regulates, supports and promotes 1.4m hectares of forests in Scotland and leads on the delivery of woodland creation targets. The Chief Executive is Dave Signorini. Scottish Forestry has its national office in Edinburgh and five Conservancy offices, who lead the local delivery of functions.

The Forestry Strategy 2019-2029 has a vision for forestry in Scotland: "In 2070, Scotland will have more forests and woodlands, sustainably managed and better integrated with other land uses. These will provide a more resilient, adaptable resource, with greater natural capital value, that supports a strong economy, a thriving environment, and healthy and flourishing communities."

Scottish Forestry work with partners in the public, private and third sector to help deliver this vision.

[Scottish Forestry - Home](#)

## 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 Scottish Forestry'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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## 5. Model Plan Elements: Checklist

Element	Present	Evidence	Notes
1. Senior Officer	<b>G</b>	<b>G</b>	<p>The Public Records (Scotland) Act 2011 (the Act) requires that an individual senior staff member is identified as holding corporate responsibility for records management in a public authority.</p> <p>Scottish Forestry have identified David Signorini, Chief Executive Officer (CEO) and Accountable Officer, as the individual with overall responsibility for records management in the organisation.</p> <p>The identification of the Chief Executive Officer to this role is supported by an <i>Assurance Letter to the Keeper from the CEO</i> (dated 11 November 2020) and by the <i>Records Management Policy</i> which outlines governance roles and responsibilities (page 5).</p> <p>The CEO approved the <i>Records Management Plan (RMP)</i> which states “The CEO agrees the RMP in its entirety; providing the Keeper with his assurance that the arrangements under all elements will be implemented, reviewed and updated as necessary.”</p> <p>The Keeper agrees that Scottish Forestry have identified an appropriate individual to this role as required by the Act.</p>
2. Records Manager	<b>G</b>	<b>G</b>	<p>The Act requires that each authority identifies an individual staff member as holding operational responsibility for records management and has appropriate corporate</p>

			<p>responsibility, access to resources and skills.</p> <p>Scottish Forestry have identified Marliese Richmond, Corporate Planning and Governance Manager, as the individual with day-to-day responsibility for implementing the RMP. It is noted that this role is overseen by Jonathan Taylor, Head of SF Executive Office (<i>RMP</i>).</p> <p>The <i>Assurance Letter to the Keeper from CEO</i> notes Jonathan Taylor, Head of Executive Office, has responsibility for day-to-day oversight of records management and that he reports directly to the CEO.</p> <p>An extract of the <i>Corporate Planning and Governance Manager job description</i>, identifying records management responsibilities, has been submitted to the Keeper.</p> <p>The <i>Records Management Policy</i> outlines governance roles and responsibilities (page 5) noting, the Corporate Planning and Governance Manager is the lead contact on data protection.</p> <p>The Corporate Planning and Governance Manager is identified as the individual who will carry out the annual review of the <i>Records Management Policy</i>.</p> <p>The Keeper has been provided with <i>Scottish Forestry Information Governance Group Terms of Reference</i> (agreed 25 August 2021). The Corporate Planning and Governance Manager is named as Chair of this group.</p> <p>Future training for the Corporate Planning and Governance Manager is outlined under Element 12, including undertaking the Practitioner Certificate in Scottish Public Sector Records Management.</p> <p>Scottish Forestry have noted that a temporary post of Information Governance</p>
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			<p>Manager will be advertised imminently.</p> <p>The Keeper agrees that Scottish Forestry have identified an appropriate individual to this role as required by the Act.</p>
3. Policy	<b>G</b>	<b>G</b>	<p>The Act requires an authority to have an appropriate policy statement on records management.</p> <p>Scottish Forestry have a <i>Records Management Policy</i> (dated 28 October 2020). The Keeper has been provided with a copy. It will be reviewed annually by the Corporate Planning and Governance Manager (Element 2) and will be “monitored on a regular basis with input from the Audit and Assurance Committee.” (<i>Policy</i> page 8)</p> <p>The <i>Records Management Policy</i> is available on the Scottish Forestry public website, <a href="#">Scottish Forestry - Records Management Policy</a>. The Keeper has been provided with a screen shot of the intranet page for records management information, which includes a link to the <i>Policy</i>.</p> <p>The <i>Staff Welcome and Induction Pack</i> contains a link to the <i>Policy</i> and the <i>RMP</i>. The <i>Welcome and Induction Pack</i> and a screen shot of the intranet page showing the links in the Welcome Pack have been provided to the Keeper.</p> <p>A <i>Staff Communication</i> was issued on 16 November 2020 to inform staff of the launch of the <i>Records Management Policy</i>, provide links to the policy, and to encourage staff to read and familiarise themselves with it. A copy of this communication and a screen shot showing the staff bulletin have been provided to the Keeper.</p> <p>Scottish Forestry acknowledge that “Records underpin our organisation’s policy development and decision-making processes.’ and adhere to the Information</p>

			<p>Principles endorsed by the National Archives and the Knowledge Council. (<i>Policy</i> pages 3-4)</p> <p>The <i>Policy</i> applies to all records regardless of format and should be followed by all staff. It is aligned to Scottish Forestry’s Corporate Objectives and records management is noted as being “essential in ensuring we meet our strategic objectives as set out in Scottish Forestry’s Corporate Plan 2020 – 2023.” (<i>Policy</i> page 4)</p> <p>The <i>RMP</i> commits to “achieving a systematic and planned approach to the management of records within the organisation, from creation to ultimate disposal.”</p> <p>The Keeper agrees that the <i>RMP</i> supports the objectives of the <i>Records Management Policy</i>.</p> <p>The Keeper agrees that Scottish Forestry have a formal records management policy statement as required by the Act.</p>
<p>4. Business Classification</p>	<p><b>A</b></p>	<p><b>A</b></p>	<p>The Keeper of the Records of Scotland (the Keeper) expects that the public records of an authority are known and are identified within a structure.</p> <p>Scottish Forestry’s public records are held digitally on an electronic document and records management system (eDRMs), on line of business systems and on shared drives. There are also public records held in hard copy (paper) format stored onsite in the national office and local offices. A third party storage provider, Iron Mountain, stores records at an offsite location.</p> <p><u>Digital (eRDM):</u>          Scottish Forestry use the Scottish Government (SG) eRDM system, Objective, to manage their public records. The Keeper has been provided with two screen shots</p>

			<p>of the eRDMs showing an <i>extract of the SF file plan and Scottish Government Standard File type guidance.</i></p> <p><u>Digital (shared drives):</u> Shared drives are used by Scottish Forestry. “Legacy information assets held by SF will be audited, maintained, retrieved and destroyed or preserved in accordance with our business need, statutory and legislative requirements. Where applicable legacy records will be moved to the appropriate electronic records management systems.” <i>Records Management Policy</i> (page 7).</p> <p><u>Digital (line of business):</u> Line of business systems such as RP&amp;S, Casebook, Geostore and eFIN are used by Scottish Forestry. These line of business systems sit outside the eRDMs, but the Keeper can agree that they are likely to allow the appropriate management of records within a structure as required.</p> <p><u>Hard copy (paper) onsite:</u> Paper records are stored at various local offices and the national office. (<i>RMP</i> page 8).</p> <p><u>Hard copy (paper) offsite:</u> Scottish Forestry store paper records with a third party offsite storage provider, Iron Mountain (<i>RMP</i> page 8).</p> <p>Scottish Forestry acknowledge the importance of a Business Classification Scheme (BCS) noting it is “the keystone of the records management function” (<i>RMP</i>). Scottish Forestry have adopted the SG BCS. The <i>RMP</i> notes this BCS has been “adapted from the Integrated Sector Vocabulary Scheme (ISVS) and Government Category List. The scheme has four levels of classification, the first three levels are subject based and the fourth level describes the activity undertaken.” The BCS only covers public records held in the eRDMs.</p> <p><b>Scottish Forestry acknowledge work is required to ensure all the authority’s public records are included in the BCS. The Keeper welcomes the</b></p>
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			<p><b>commitment under the further development section to carry out work to address this as part of a Data Audit Project. The Data Audit Project is accountable to Senior Executive Team (SET) and all members of the project team sit on the Information Governance Group (IGG).</b></p> <p><b>The following commitment is also made in the <i>Records Management Policy</i> (page 7), “Paper-based records will be subject to the same management procedures as electronic data”. Scottish Forestry are undertaking to work develop an Information Asset Register (IAR) which will form the basis for their BCS. Consideration of the SG Information Management Strategy and capturing the lessons learned from this review are informing this work. An update on initial work on the IAR was due to be submitted to the Senior Executive Team to review on 19th October 2021. Scottish Forestry have committed to updating the Keeper with timelines for delivery following this meeting.</b></p> <p><b>An <i>Agenda and Minutes for the IGG</i> (dated 25 August 2021) have been submitted to the Keeper. The minutes include details of the Data Audit Project and the development of the IAR. Timelines for the Data Audit Project are currently being revised to reflect staff access to physical records once staff return to offices with the easing of Covid-19 restrictions and to reflect staff changes.</b></p> <p><b>While work is ongoing to develop an IAR and BCS and implement the BCS to cover all of Scottish Forestry’s public records the Keeper can agree this element on an ‘improvement model’ basis. This agreement is dependent on the Keeper being provided with updates on the Data Audit Project, the development of an IAR and implementation of a BCS to include all public records held by Scottish Forestry; and conditional on being kept informed of progress on the transfer of records from shared drives to the eRDMS.</b></p>
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<p>5. Retention schedule</p>	<p><b>A</b></p>	<p><b>A</b></p>	<p>The Keeper expects an authority to have allocated retention periods to its public records and for those records to be retained and disposed of in accordance with a Retention Schedule.</p> <p>Scottish Forestry have adopted the SG's Retention and Disposal Policy. Standard retention schedules are applied to files created in eRDM. A screen shot of the eRDMs showing <i>Scottish Government Standard File type guidance</i> has been provided to the Keeper, who is familiar with this policy.</p> <p><u>Digital (eRDM)</u>: Standard retention schedules are applied to files created in eRDM based on file type. Information Management Support Officers (IMSOs) “attach a file type to an eRDM file when it is created. This will determine when the file will close and the action that is taken on the file on closure. The file will either be archived, destroyed or reviewed a period of time after closure.” (<i>Screen shot of SF intranet page for records management information</i>)</p> <p><b><u>Digital (shared drives) and Digital (line of business)</u>: Retention schedules are not currently applied to digital records held on shared drives. Scottish Forestry are clear that appropriate retention decisions are not in place for “other files and systems” and that “Further work is required to implement appropriate retention schedules across all Scottish Forestry records” (RMP). Scottish Forestry acknowledge the need to improve the implementation of retentions periods across all records and note work to address this will be developed along with the completion of the IAR. (see Element 4).</b></p> <p><u>Hard copy (paper) onsite</u>: Scottish Forestry use a <i>Forestry Commission (predecessor body) Paper Records Retention Schedule</i> to manage the retention and disposal of paper records. An extract of this <i>Schedule</i> showing the current retention periods in use has been provided to the Keeper. Paper records held in the</p>
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			<p>national office are subject to an annual audit, carried out by the Office Manager, to identify records for disposal or permanent preservation. This identifies records to be transferred to third party (Iron Mountain) offsite storage and the movement of records is recorded in a spreadsheet. A <i>Sample Records Movement Sheet</i> has been submitted to the Keeper. There are variations to this process in regional offices. <b>The RMP commits to updating retention schedules and introducing a uniform process across all offices.</b></p> <p><u>Hard copy (paper) offsite:</u> Scottish Forestry use a Forestry Commission (predecessor body) Paper Records Retention Schedule to manage the retention and disposal of paper records. Files sent to Iron Mountain (see above) are allocated a review year. Annually Scottish Forestry staff physically review each file due for review at the offsite storage facility. A decision is then taken to retain or destroy. This process is currently paused due to Covid-19.</p> <p><b>Scottish Forestry state “work will commence to address how information held in legacy storage is retained and disposed of.” (RMP) The planned Data Audit Project (see Element 4), led by the Change and Project Manager, will audit legacy data held on shared drives, assess how outlying offices manage paper records and identify retention schedules updates for regional offices.</b> This project is supported by the CEO (Element 1). The <i>Records Management Policy</i> (page 7) also notes the commitment to reviewing legacy information and that it will be “audited, maintained, retrieved and destroyed or preserved in accordance with our business need, statutory and legislative requirements.” <b>This planned work is welcomed by the Keeper who would like to be kept updated on progress.</b></p> <p>A commitment to the implementation of retention schedules which “set out the recommended periods for which particular classes of records should be retained in accordance with our legal, audit and operational requirements” is noted in the <i>Records Management Policy</i> (page 7). <i>A Data Audit Project - Element 5 - Task</i></p>
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			<p><i>Report</i>, dated 7 September 2021, has been submitted to the Keeper. This outlines the current tasks, timescales, responsible staff member and progress so far.</p> <p><b>Scottish Forestry recognise a gap in provision under this element, with up to date retention decisions being applied only to digital records within the eRDMs and a lack of a uniform process in managing paper records across all offices. There is a commitment to carrying out work to ensure appropriate retention schedules are in place across all Scottish Forestry records and work is already underway. The Keeper can agree this element on an ‘improvement model’ basis on the condition he is kept up to date as the Data Audit Project progresses.</b></p>
6. Destruction Arrangements	<b>A</b>	<b>A</b>	<p>The Act requires that public records are destroyed in a timely, controlled and secure manner.</p> <p>Scottish Forestry have adopted the SG’s Retention and Disposal Policy for eRDM. (See Element 5 for application of retention schedules)</p> <p><u>Digital (eRDM)</u>: Scottish Forestry use the SG eRDM system, Objective, to manage their public records. As such they are subject to the automated destruction processes of that system. An extract from <i>iTECS Terms of Supply for the Provision of ICT Services</i> has been provided to the Keeper</p> <p><u>Digital (shared drives and line of business)</u>: Retention and destruction rules are not being imposed on records stored on shared drives. Work is planned to address this in the form of the Data Audit Project (see Elements 4 and 5). This will also involve Forestry and Land Scotland, who provide digital services to Scottish Forestry, in relation data held in their data centre.</p> <p>Hard copy (paper) onsite: Paper records are shredded securely onsite at the</p>

			<p>Scottish Forestry National Office. A third party contractor carried out this service until the contract expired in June 2020 and this has not been renewed due to there being no access to Scottish Forestry buildings during Covid-19 restrictions. <b>Once onsite destruction is recommenced the Keeper will require confirmation of the renewed arrangement. Paper records are safely and securely disposed of in regional offices, where processes vary. Details of the different processes have been supplied. These include the use of different third party contractors. Scottish Forestry intend to review these arrangements once access to local offices resumes and to include regional offices under the Iron Mountain contract. Further work to address the destruction of paper records in outlying offices will be included in the Data Audit Project (see Element 4). Details of planned review work to be carried at the local conservancy offices between October and December 2021 has been provided to the Keeper. Updates on progress can be submitted through the <a href="#">Progress Update Review (PUR) mechanism</a>.</b></p> <p><u>Hard copy (paper) offsite:</u> Iron Mountain provide a destruction (shredding and disposal) service as part of the contract for storage. A copy of the <i>Iron Mountain contract</i> has been provided. A spreadsheet used to record the movement of records from onsite to offsite storage (see Element 5) is updated with the disposal date after records are destroyed. Files sent to Iron Mountain are allocated a review year. Annually Scottish Forestry staff physically review each file due for review at the offsite storage facility. A decision is then taken to retain or destroy and Iron Mountain will then carry out the secure destruction and provide Scottish Forestry with confirmation of the records destroyed. This process is currently paused due to Covid-19. <b>The Keeper can be updated on the recommencement of this process through the Progress Update Review (PUR) mechanism.</b></p> <p><u>Hardware:</u> Scottish Forestry hardware is disposed of in line with the SG <i>iTECS Terms of Supply for the Provision of ICT Services</i>. Section 3.6 states equipment is</p>
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			<p>securely erased of all data and, if necessary, disposed of in accordance with NCSC standards.</p> <p><b>Back-ups:</b> Forestry and Land Scotland (FLS) provide Scottish Forestry with Digital Services support. A <i>Statement from Digital Services (FLS)</i> explains backup data is stored in a data centre and in Azure; and that no back-up data has been destroyed yet as a retention period is yet to be set. The <i>Statement</i> notes “as that retention period is defined we will then put that into our backup systems so that data is deleted from the backups ensuring the retention period is met”. The Keeper requests that he is updated on progress so he can be confident the authority have put in place arrangements to permanently delete back-ups and are clear on the length of time back-ups are accessible. It is understood this work will form part of the Data Audit Project. An extract has also been provided relating to systems operating on SG SCOTS network, <i>Text from the iTECS Terms of Supply (and covers all data managed by iTECS not including eRDM)</i>. This explains back-ups of data on SCOTS is kept for four weeks then irretrievably overwritten.</p> <p>The permanent destruction of emails is managed by Enterprise Vault using retention periods defined by the SG.</p> <p><b>Scottish Forestry have highlighted areas which require further work to ensure the secure and permanent destruction of hard copy (paper) records and digital back-ups. As this gap in provision has been acknowledged and work is planned to address it the Keeper can agree this element on an ‘Improvement Model’ basis on the condition he is kept up to date with progress of the Data Audit Project.</b></p>
7. Archiving and Transfer	<b>A</b>	<b>G</b>	The Act requires that all Scottish public authorities identify a suitable repository for the permanent preservation of any records considered suitable for archiving. A

			<p>formal arrangement for transfer to that repository must be in place.</p> <p>Scottish Forestry have identified National Records of Scotland (NRS) as the proper repository for their public records suitable for permanent preservation.</p> <p>NRS is an accredited archive <a href="https://www.nrscotland.gov.uk/news/2015/national-records-of-scotland-receives-archive-accreditation-award">https://www.nrscotland.gov.uk/news/2015/national-records-of-scotland-receives-archive-accreditation-award</a> and fully adheres to the Keeper’s Supplementary Guidance on Proper Arrangements for Archiving Public Records: <a href="https://www.nrscotland.gov.uk/files//record-keeping/public-records-act/supplementary-guidance-on-proper-arrangements-for-archiving-public-records.pdf">https://www.nrscotland.gov.uk/files//record-keeping/public-records-act/supplementary-guidance-on-proper-arrangements-for-archiving-public-records.pdf</a>.</p> <p><b>An MOU/Transfer Agreement is not yet in place between Scottish Forestry and NRS. The RMP notes that this would cover paper legacy files held by Scottish Forestry and goes on to note “eRDM files which contain the file type ‘Archive’ or ‘Review on closure’ could potentially be sent to NRS for preservation.” Scottish Forestry met with their NRS Client Manager, Jean Crawford, on 11 August 2021 and are working towards developing a transfer agreement. Scottish Forestry have committed to notifying the Keeper once this agreement is finalised.</b></p> <p>Public records stored in the eRDM as ‘Archive’ or ‘Review on closure’ are highlighted to Scottish Forestry annually through an SG Corporate Records Manager report, at which time a final decision is made on selection for permanent preservation.</p> <p>Work is underway to migrate public records from shared drives to the eRDM and assess the legacy records remaining on shared drives. This work is being carried out by the Scottish Forestry Change and Project Management Team in conjunction with local business areas and is part of the wider Data Audit Project (RMP).The</p>
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			<p>Data Audit Project will also address legacy paper files stored in outlying offices (see Element 6 above for details of planned reviews in local offices).</p> <p><b>Scottish Forestry have identified an appropriate repository for the permanent preservation of selected records and working towards developing an agreement with NRS. The Keeper can agree this element on an ‘Improvement Model’ basis with the condition he is updated once a formal agreement is in place.</b></p>
8. Information Security	<b>G</b>	<b>G</b>	<p>The Act requires that public records are held in accordance with information security compliance requirements.</p> <p>Scottish Forestry have an <i>Information Security Policy</i> (version 1.0 dated 24 July 2020), a copy of which has been supplied as evidence.</p> <p>A number of supporting policies, which have been submitted to the Keeper, underpin this overarching policy and include, <i>Clear Desk and Workstation Policy</i>, <i>Digital Security Policy</i>, <i>Digital Incident Management Policy</i> and <i>Removable Media Policy</i>. As Forestry and Land Scotland (FLS) provide Scottish Forestry with Digital Services support (see Element 6) several of these policies and the <i>Information Security Policy</i> are applicable to both authorities.</p> <p>All formats are considered as stated in the <i>Information Security Policy</i> introduction, “The confidentiality, integrity and availability of information, in all its forms, are critical to the ongoing functioning and good governance of the Agency”.</p> <p>These policies detail security requirements, roles and responsibilities and legislation. Supporting guidance is referred to in each, for example “Government Security Classifications, IT Security When Mobile Working, Malicious Software, Passwords, Email Best Practice” (<i>Digital Security Policy</i> page 4).</p>

			<p>Scottish Forestry have confirmed these updated policies are available to staff.</p> <p><b>If staff require access to legacy Forestry Commission policies this done by making a request to FLS. Scottish Forestry will take action to show the process for making this request via Saltire guidance and provide a screenshot as evidence once completed. This can be done through the Progress Update Review(PUR) mechanism.</b></p> <p><u>Digital (eRDM, shared drives and line of business):</u> The eDRM is governed by published information security procedures and Scottish Forestry observe the <i>SCOTS IT Code of Conduct (RMP)</i>. A link to SG information security policies and procedures has been provided in the <i>Records Management Policy</i> (page 5). Scottish Forestry have around 20 Information Management Officers (IMOs) who have eRDM information security and management responsibilities.</p> <p><u>Digital (shared drives):</u> There are restrictions on access, relating to a person's role, for certain shared drives and operating systems. Scottish Forestry observe the <i>SCOTS IT Code of Conduct (RMP)</i>. Public records stored electronically are on secure networks accessible only through the use of an encrypted laptop or desktop.</p> <p><u>Digital (line of business):</u> There are restrictions on access, relating to a person's role, for certain shared drives and operating systems (such as Casebook). The Keeper can agree that line-of-business systems operated by Scottish Forestry have adequate information security provision as part of their functionality.</p> <p><u>Hard copy (paper) onsite:</u> Access and security of physical records is addressed under the Clear Desk Policy and Physical Security Access Control Policy. A record movement spreadsheet is in use to record movement of physical records and a copy has been submitted to the Keeper.</p>
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			<p><u>Hard copy (paper) offsite:</u> Third party storage is provided by Iron Mountain who have robust security arrangements in place.</p> <p>A copy of <i>Information Governance Group Terms of Reference</i>, provided to the Keeper, notes information and digital security as one of the key areas of focus of the group. The group’s remit includes “Risks associated with information governance will be identified, mitigated where possible, and escalated if necessary...The group will seek to gain learning from incident breaches and make recommendations on improving practices.” (page 3). The group also review reports of incident breaches. (page 4)</p> <p>FLS provide Scottish Forestry with Digital services (see Element 6) and have achieved Cyber Essentials Plus certification as well as ISO 27001 certification. <i>Certificate of Assurance</i> (dated 27 February 2020) has been submitted to the Keeper. This was renewed in February 2021: Forestry and Land Scotland, Edinburgh Sector: Agriculture, Forestry and Fishing Certificate number: IASME-CEP-002715 Certificate level: Cyber Essentials Plus Date issued: 23/02/21</p> <p>A member of Scottish Forestry staff sits on the FLS Security and Information Risk Assurance Board (SIRAB) (<i>Records Management Policy</i> page 6). The reporting structure included in the <i>Information Governance Group Terms of Reference</i> (page 3) shows a flow of information between the two governance groups.</p> <p>The reporting system and management of security breaches is addressed under the <i>Digital Incident Management Policy</i> (version 1.0 dated August 2021). Any security incidents are reported to the SIRAB and regularly reviewed, with high and medium</p>
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			<p>risk incidents reported directly to the SIRO. (<i>Digital Incident Management Policy</i>, page 4). Staff can access information about reporting cyber incidents and security incidents on Saltire intranet pages and screen shots showing these pages have been submitted.</p> <p>Staff undertake mandatory data protection training. (see Elements 9 and 12)</p> <p>Scottish Government information security classifications are in use by Scottish Forestry (<i>Staff Welcome and Induction Pack</i> page 17).</p> <p>A Corporate Risk Register is maintained which manages information risks. A <i>Screenshot from the SF Corporate Risk Register</i> has been provided to the Keeper.</p> <p>The Keeper agrees that Scottish Forestry have procedures in place to appropriately ensure the security of their records as required by the Act.</p>
9. Data Protection	<b>G</b>	<b>G</b>	<p>The Keeper expects a Scottish public authority to manage records involving personal data in compliance with data protection law.</p> <p>Scottish Forestry have adopted the Scottish Government Data Protection Policy. A link to the SG Data Protection Policy (version 1.0) has been provided to the Keeper in the <i>Records Management Policy</i> (see Element 3). The SG Data Protection Policy provides links to associated documents and guidance including data protection impact assessment, privacy notice checklist, data sharing agreements (personal data), and subject access request guidance.</p> <p>The SG Data Protection Policy explains the 6 principles of data protection (section 3).</p> <p>A screen shot of the Scottish Forestry intranet site has been provided to the Keeper</p>

			<p>showing how staff access the Policy and associated information, <i>Saltire Screenshot – links to Data Protection Policy and information</i>. The Keeper is content that staff can access key policies and guidance on data protection.</p> <p>The <i>Records Management Policy</i> (page 5) notes “Under the MOU with Scottish Ministers, the Scottish Government DPO role covers Scottish Forestry.” It identifies the Corporate Planning and Governance Manager (Element 2) as the Scottish Forestry lead contact on data protection. The Data Protection Contact Officer liaises with the SG Data Protection Unit.</p> <p>Scottish Forestry is registered with the Information Commissioner’s Office (ICO) as part of Scottish Ministers: <a href="#">Information Commissioners - Data protection register - entry details (ico.org.uk)</a>. The SG Data Protection Team provide advice and guidance to Scottish Forestry.</p> <p>A <i>Privacy Policy, Privacy, Complaints, Freedom of Information &amp; Requesting Information</i>, is published on the Scottish Forestry website, <a href="#">Scottish Forestry - Privacy Policy</a>. It provides information on making a Subject Access Request (SAR). Additional privacy notices are also published the Scottish Forestry website, including Scottish Forestry Data Privacy Notice– Felling Permissions.</p> <p>The <i>Saltire Screenshot – links to Data Protection Policy and information</i> shows staff have access to information and guidance on SARs and redacting information.</p> <p>Scottish Forestry staff are required to complete mandatory SG Data Protection e-learning training. This training must be taken annually. Additional Information Management Principals training is available on the SG Learning Portal.</p> <p>The Scottish Forestry Information Governance Group monitor completion of Data Impact Assessments (DIPAs) and resulting actions. (<i>Terms of Reference</i>, page 4)</p>
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			<p>The Keeper can agree that Scottish Forestry have arrangements in place that allow them to properly comply with data protection legislation.</p>
<p>10. Business Continuity and Vital Records</p>	<p><b>A</b></p>	<p><b>A</b></p>	<p>The Keeper expects that record recovery, prioritising vital records, is an integral part of the authority's business continuity planning.</p> <p>The <i>Records Management Policy</i> (page 4) states "Effective records management assists in managing risk and provides continuity during adversity or disaster."</p> <p>Scottish Forestry have both corporate and local Business Continuity Plans (BCPs). The <i>Corporate Business Continuity Plan</i> (version 2.2 dated January 2020) and a <i>Screenshot from Corporate Business Continuity Plan</i> have been provided to the Keeper. These show actions are highlighted to ensure effective records management and remote access to records to digital records. Scottish Forestry also maintain a <i>Data Management, Disaster Recovery and Business Continuity Planning vs Risk</i> spreadsheet which has also been provided.</p> <p><b>Scottish Forestry make it clear in their compliance statement that "these plans need to strengthen the actions relating to paper and digital records." Developing local BCPs is identified as a further development and Scottish Forestry. Business continuity planning work will be developed through a Business Resilience Workshop and plans for this workshop will be discussed in more detail initially with the Head of Executive Office in September 2021.</b></p> <p><b>The Keeper must be confident staff have access to business continuity arrangements. Scottish Forestry intend to make BCPs available to staff on the Saltire intranet site. Once this action has been completed the Keeper can be updated through the Progress Update Review (PUR) mechanism.</b></p>

			<p>Forestry and Land Scotland (FLS) provide Scottish Forestry with Digital Services support (see Element 6) and Scottish Forestry have a nominated staff member who sits on the FLS Security &amp; Information Risk Assurance Board (SIRAB). (<i>Records Management Policy</i> page 6)</p> <p>The Keeper has been provided with a <i>Statement from [FLS] Digital Services regarding Business Continuity and Plan</i> which explains disaster recovery procedures in place in the event of disruption to digital services and access to the data centre. These procedures, described as phase 1, have been implemented and tested.</p> <p>A copy of <i>FLS Disaster Recovery Corporate Summary and Plan</i> (version 1.1 dated 28 October 2020) has also been provided to the Keeper. This provides further details and timelines for a phase 2 to enhance resilience.</p> <p>A <i>Statement from the iTECS Terms of Supply for the Provision of ICT Services</i> has been provided and outlines processes in place for ensuring business continuity in the event of disruption to SCOTS services. The eRDM is hosted on the SCOTS infrastructure.</p> <p><b>Identifying vital paper records and scanning them is noted in the <i>Screenshot from Corporate Business Continuity Plan</i> provided to the Keeper. It states “Specific vital records have not been identified. Rather, ensuring remote access has been identified as a priority; as well as a shift to digital files and ways of working such as digital signatures.” Work being undertaken to develop an IAR (see Element 4) will include the identification of core business records.</b></p> <p><b>Scottish Forestry have identified work to improve their Business Continuity arrangements around local BCPs, staff access to BCPs and the identification</b></p>
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			<p>of core business records. The Keeper can agree this element on an 'improvement model' basis as Scottish Forestry have acknowledged limitations in provision around business continuity arrangements and have identified that work is required to improve this. This agreement is dependent of the Keeper being notified of progress to close this gap in provision.</p>
11. Audit trail	<b>A</b>	<b>A</b>	<p>The Keeper expects an authority to have processes in place to track public records in such a way that their location is known and changes recorded.</p> <p>The <i>Records Management Policy</i> notes “Our information must be managed effectively and safely from inception to disposal, providing a transparent and accountable trail. Effective records management makes access to our information quicker and easier...” (page 4). And goes on to state “Our information will be accessible... It will be stored in a way which makes it easy to find.” (<i>Policy</i> page 7)</p> <p><u>Digital (eRDM)</u>: Scottish Forestry use the SG eRDMs, Objective, which has an 'electronic audit trail as evidence of viewing, modifying and deletion of records and the files that the records are contained in.' (<i>RMP</i>). The eRDMs imposes automatic version control. Guidance on naming convention in eRDMs is part of the mandatory staff training and a screen shots showing this and version control guidance have been provided. <i>Document Naming Best Practice Guidance</i> and a screen shot showing how staff access this have been provided.</p> <p><u>Digital (shared drives and line of business systems) and hard copy (paper) onsite</u>: Scottish Forestry acknowledge there is “limited audit trail” (<i>RMP</i>) in place for public records held outwith the eRDMs and work is required to ensure processes are in place to track these records in such a way that their location is known and changes recorded. This is to be addressed as part of the data Audit Project (see Element 4). A spreadsheet is in use to record the movement of hard copy (paper) records when they are being transferred to</p>

			<p><b>offsite storage with Iron Mountain. (see Element 5)</b></p> <p><u>Hard copy (paper) offsite:</u> Iron Mountain provide third party offsite storage and have robust procedures in place for document tracking.</p> <p>Staff training is required before accessing eRDM (see Element 12 below).</p> <p>The further developments section of the <i>RMP</i> notes the Data Audit Project will review audit trail for all Scottish Forestry records. (see Element 4).</p> <p><b>The Keeper can agree this element on an ‘improvement model’ basis as Scottish Forestry have acknowledged limitations in provision around audit trail (records held outwith eRDMs) and have planned work in place to improve this. As with several other elements work to address this forms part of the Data Audit Project. This agreement is conditional on the Keeper being updated on progress.</b></p>
<p>12. Competency Framework for records management staff</p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>The Keeper expects staff creating, or otherwise processing records, to be appropriately trained and supported.</p> <p>The <i>Records Management Policy</i> (page 7) highlights the responsibility all Scottish Forestry staff have “for the management of the information they create, use or share and for protecting and storing and disposing [of] this information safely at the right time”. It also commits to training all staff to ensure this can be achieved.</p> <p>Staff complete mandatory eRDM training before use of the SG SCOTS network and Information Management Officers (IMOs) undertake additional eRDM training.</p> <p>Section 9 of the <i>Records Management Policy</i> provides details and links to training modules. It makes it clear these modules and guidance are always available for staff</p>

			<p>to refresh their knowledge. Scottish Forestry and FLS have a dedicated learning platform, iLearn, with the following information governance training modules:</p> <ul style="list-style-type: none"> <li>• Managing Information as an Asset</li> <li>• Protecting and Sharing Information</li> <li>• Understanding GDPR</li> <li>• Guide to GDPR</li> </ul> <p>The iLearn platform also allows staff to record additional training undertaken to maintain their record of learning.</p> <p>Staff are required to complete a mandatory, annual SG Data Protection e-learning module. Additional Information Management Principles training is also available to staff on the SG Learning Portal. (<i>RMP</i>)</p> <p>The Keeper commends Scottish Forestry’s recognition of “the importance of allocating the required time and resources required to enable staff to practise safe and effective records management.” <i>Records Management Policy</i> (page 7)</p> <p>Staff positions with information management roles and responsibilities are identified as Corporate Planning and Governance Manager and Head of SF Executive Office (see Element 2); and Project Manager for the Data Audit Project and Head of Change and Project Management. Future training and development opportunities for these staff are listed under the further developments section (<i>RMP</i>). Staff have attended several PRSA Surgery events in 2021. Marliese Richmond attended FYI Practitioner Certificate in Scottish Public Sector Records Management in Aug/Sept 2021 and is currently working on the assessment component of this training.</p> <p>The Information Governance Group consider staff training and knowledge as part of its remit and monitor completion of mandatory training. (<i>RMP</i> and <i>Terms of</i></p>
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			<p>Reference page 4).</p> <p>The Staff Welcome and Induction Pack contains a link to the <i>Records Management Policy</i> and the <i>RMP</i>. The Keeper has been provided with a screen shot of the Scottish Forestry intranet page for records management information, which includes links to these. A further intranet screen shot has been provided showing access to the Data Protection Policy and guidance. Scottish Forestry have confirmed updated legacy documents (See Element 8) will be included on the intranet site and staff briefings will be used to communicate the availability of these.</p> <p>The Keeper can agree that the individual identified at Element 2 has the appropriate responsibilities, resources and skills to implement the records management plan. Furthermore, he agrees that Scottish Forestry consider information governance training for staff as required.</p>
<p>13. Assessment and Review</p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>Section 1(5)(i)(a) of the Act says that an authority must keep its RMP under review.</p> <p>Scottish Forestry commit to reviewing their <i>Records Management Plan and Records Management Policy</i> annually. The CEO (Element 1) has given his assurance to the Keeper that all elements of the RMP will be reviewed and updated as necessary. (<i>RMP</i>).</p> <p>The reviews will be carried out by the Corporate Planning and Governance Manager (Element 2). The Information Governance Group will also be involved in the review process. Its remit includes “review systems and process and develop new approaches and policies if necessary, to ensure current Information Management legislation and guidance is being implemented” (<i>Terms of Reference</i> page 3).</p> <p>The Information Governance Group is chaired by the Corporate Planning and Governance Manager (Element 2). It meets quarterly and reports to the Audit and</p>

			<p>Assurance Committee with issues escalated to the Executive Team when required. The Chief Executive (Element 1) routinely attends the Audit and Assurance Committee meetings.</p> <p>The <i>Records Management Policy</i> (page 8) notes it will be regularly monitored with input from the Audit and Assurance Committee and oversight from accountable officer will have oversight of activities</p> <p>The Keeper considers it best practice to regularly review the policies and procedures which underpin the <i>RMP</i>.</p> <p>Scottish Forestry intend to use tools available on the Scottish Council on Archives (SCA) website to inform their reviews. The Archive and Records Management Services Quality Improvement framework (ARMS) (<a href="http://www.scottisharchives.org.uk">Archive and Records Management Services Quality Improvement Framework (ARMS) - Scottish Council on Archives (scottisharchives.org.uk)</a>) is available on this site.</p> <p><b>Scottish Forestry are investigating the possibility of involvement of the Internal Audit Team in the records management review process. The Keeper commends this intention and would like to be kept up to date if plans progress.</b></p> <p>Scottish Forestry commit to participating in the Progress Update Review (PUR) process (<i>RMP</i> introduction). Engagement with this voluntary self-assessment reporting mechanism is commended by the Keeper.</p> <p>The Keeper agrees that Scottish Forestry have made a commitment to review their <i>RMP</i> as required by the Act and have explained who will carry out this review and the structure of reporting within Scottish Forestry. The review will be informed by tools available on the SCA website and possibly also involve input from Internal</p>
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			Audit.
14. Shared Information	<b>G</b>	<b>G</b>	<p>The Keeper expects a Scottish public authority to ensure that information sharing, both within the Authority and with other bodies or individuals, is necessary, lawful and controlled.</p> <p>Scottish Forestry share information with a number of other bodies and organisations and have “a range of information sharing arrangements in place” (<i>RMP</i> page 17).</p> <p>An explanation of data sharing arrangements is included in the <i>Information Governance Group Terms of Reference</i> provided to the Keeper. This includes a set of <i>SF Data Flows</i> slides (dated 21 September 2021). These detail where information is stored (e.g. various line of business systems) and which bodies it is shared with. Advice and assistance is provided by the SG Data Protection Team. (see Element 9)</p> <p>A <i>screenshot of MoU’s and Data Sharing Arrangements</i> showing a list of documents in the eRDMS has been provided to the Keeper.</p> <p>Paper copy versions of some MOU’s are held in Silvan House. Once staff return to working onsite, after Covid-19 restrictions, these will be checked and any not already retained as digital files will be scanned and stored on the eRDMS.</p> <p>A copy of a <i>Data Sharing Agreement between The Scottish Government – Agriculture and Rural Economy (ARE) and Scottish Forestry</i>, (version 1.1, dated 9 April 2019) has also been submitted to the Keeper.</p> <p>The <i>Records Management Policy</i> (page 7) commits to making Scottish Forestry information accessible and meeting statutory duties in this regard unless legislation requires the protection of specific information.</p>

			<p>The <i>SF Guide to Information</i> (dated 2020) is published on the website, <a href="#">Scottish Forestry - Guide to Information</a>. Scottish Forestry are in the process of developing their own Open Data Publications plan and currently operate under the Scottish Government Open Data Strategy (<i>Guide to Information</i> page 21).</p> <p>Staff can access training on Protecting and Sharing Information through the i-Learn training platform. (see Element 12)</p> <p>The Keeper can agree that Scottish Forestry properly considers records governance when undertaking information sharing programmes.</p>
<p>15. Public records created or held by third parties</p>	<p><b>A</b></p>	<p><b>A</b></p>	<p>The Act expects a public authority to ensure that adequate arrangements are in place for the management of records created and held by third parties who carry out any functions of the authority.</p> <p>The <i>RMP</i> states that further work is required to establish how this element applies to the authority and Scottish Forestry have separately confirmed that third parties carry out functions on their behalf and as a result create public records under the Act.</p> <p>Scottish Forestry have committed to carrying out work to review all contractual agreements with these third parties to ensure arrangements are managed accordingly. The importance of working with procurement services to ensure third parties are appropriately managing records created and held while carrying out functions on behalf of Scottish Forestry is acknowledged.</p> <p>Scottish Forestry commit to using the ARMS guidance for contracts (<a href="#">ARMS: Records Management Clauses For Contractors</a>) available on the SCA website.</p> <p><b>Scottish Forestry have acknowledged further work is required to ensure</b></p>

			<p>adequate arrangements are in place for the management of records created and held by third parties who carry out functions on behalf of the authority and have committed to carrying this out. The Keeper can therefore agree this element on an ‘improvement model’ basis as this gap in provision has been acknowledged and plans are in place for this to be addressed. This agreement is conditional on the Keeper being updated as this work progresses.</p>
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**General notes on submission:**

This is the assessment on the Records Management Plan (RMP) of Scottish Forestry submitted to the Keeper for his agreement on 11<sup>th</sup> November 2020. This is version 1.0, approved by David Signorini (Element 1) on 5<sup>th</sup> November 2020. The RMP was prepared by Alison Wilson, Head of Change and Project Management (see Element 12), and will be reviewed annually.

The RMP mentions the Act and is based on the Keeper’s, 15 element, Model Plan <http://www.nrscotland.gov.uk/record-keeping/public-records-scotland-act-2011/resources/model-records-management-plan>.

The RMP is supported by a Records Management Policy. The Policy is published on Scottish Forestry’s website, [Scottish Forestry - Records Management Policy](#) and describes records management as ‘essential’ in ensuring the authority meets its strategic objectives as set out in the Scottish Forestry Corporate Plan 2020-2023, <https://forestry.gov.scot/publications/791-corporate-plan-2020-2023/viewdocument/791>.

Key Groups

Scottish Forestry have established an Information Governance Group which is chaired by the Corporate Planning and Governance Manager (Element 2). It meets quarterly and reports to the Audit and Assurance Committee with issues escalated to the Executive Team when required. The Chief Executive (Element 1) routinely attends the Audit and Assurance Committee meetings.

The Records Management Policy notes the intention to establish an Information Governance Steering Group and the RMP confirms this policy commitment has been achieved.

Scottish Forestry have a Service Level Agreement with Forestry and Land Scotland (FLS) who provide them with services including Human Resources (People Team); Learning and Development; Health, Safety and Wellbeing; and Digital Services. The Forestry and Land Scotland Security & Information Risk Assurance Board (SIRAB) considers business risk in relation to business requirement, technological capabilities, current threat landscape, critical assets and legislative requirements. Scottish Forestry have staff member who sits on the SIRAB (*Records Management Policy* page 6)

### Local

Scottish Forestry have around 20 Information and Support Officers (IMSOs). They support use of the eRDM and receive additional training to carry out this role.

### Future Developments

The Data Audit Project, cited throughout the RMP, is a considerable piece of work planned to address many areas highlighted for improvement in the records management provision at Scottish Forestry. The project is being led by the Change and Project Manager and is supported by the CEO (see Element 5). The Data Audit Project is accountable to Senior Executive Team (SET) and all members of the project team sit on the Information Governance Group.

## 6. Keeper's Summary

Elements 1-15 that the Keeper considers should be in a public authority records management plan have been properly considered by **Scottish Forestry**. Policies and governance structures are in place to implement the actions required by the plan.

Elements that require development by **Scottish Forestry** are as follows:

Element 4 Business Classification

Element 5 Retention schedule

Element 6 Destruction Arrangements

Element 7 Archiving and Transfer

Element 10 Business Continuity and Vital Records

Element 11 Audit trail

Element 15 Public records created or held by third parties

## 7. Keeper's Determination

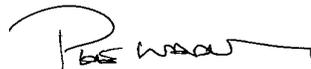
Based on the assessment process detailed above, the Keeper agrees the RMP of **Scottish Forestry**.

- The Keeper recommends Scottish Forestry 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,



**Liz Course**  
Public Records Officer



**Pete Wadley**  
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 **Scottish Forestry**. In agreeing this RMP, the Keeper expects *Scottish Forestry* to fully implement the agreed RMP and meet its obligations under the Act.

A handwritten signature in black ink, appearing to read 'Paul Lowe', with a small dot at the end.

**Paul Lowe**  
Keeper of the Records of Scotland