

Public Records (Scotland) Act 2011

Water Industry Commission for Scotland Assessment Report

The Keeper of the Records of Scotland

13 December 2016

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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 Water Industry Commission for Scotland by the Public Records (Scotland) Act 2011 Assessment Team following its submission to the Keeper on 27 July 2016.

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

The outcome of the assessment and the Keeper's decision on whether the RMP of Water Industry Commission for Scotland complies with the Act can be found under section 7 of this report with relevant recommendations.

3. Authority Background

Water Industry Commission for Scotland is a non-departmental public body with statutory responsibilities. Its mission is to manage an effective regulatory framework which encourages the Scottish water industry to provide a high-quality service and value for money to customers and acts independently of Ministers. Water Industry Commission for Scotland also has a statutory duty to promote the interests of customers. It does this by setting prices for water and sewerage services that deliver Ministers' objectives for the water industry at the lowest reasonable overall cost. The price setting process takes place every six years. In November 2014 they published a Final Determination, which set charge caps for the regulatory control period 2015-21.

It is part of their role to facilitate competition in the Scottish water industry. In April 2008 the Scottish water and sewerage market for all non-household customers was opened up to competition. These new arrangements are already bringing significant benefits to Scotland's 130,000 business customers, offering better value for money and services that are more tailored to customers' needs.

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 Water Industry Commission for Scotland's RMP was developed with proper regard to the elements of the Model Plan and is compliant with the Act. The assessment also considered whether there was sufficient supporting evidence of such compliance.

Key:

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

Element	Present	Evidence	Notes
1. Senior Officer <i>Compulsory element</i>	G	G	<p>The Records Management Plan (RMP) states that although the Chief Executive, Alan Sutherland, is the Accountable Officer for Water Industry Commission for Scotland (the Commission), the strategic responsibility for records management lies with Katherine Russell, Director of Corporate Affairs and Strategy.</p> <p>This appointment is confirmed in a signed covering letter from Mr Sutherland.</p> <p>The Records Management Policy, which has been submitted as evidence under Element 3, also confirms Ms Russell's appointment.</p>

			<p>Ms Russell provides the Covering Statement to the RMP which evidences the Commission's commitment to complying with the provisions set out in the RMP.</p> <p>The Keeper of the Records of Scotland (the Keeper) agrees that an appropriate individual has been nominated to take senior management responsibility for records management as required by the Public Records (Scotland) Act 2011 (PRSA).</p>
2. Records Manager <i>Compulsory element</i>	G	G	<p>The RMP identifies Kirsty McLean, Finance Officer and Personal Assistant, as having day-to-day responsibility for records management within the Commission. Ms McLean's role includes the development and implementation of the RMP and along with two colleagues forms the Records Management Working Group.</p> <p>Ms McLean's appointment to this role is also confirmed in the covering letter from Mr Sutherland. The letter also identifies her as being responsible for reviewing the RMP and associated policies and procedures and developing and delivering records management training to staff.</p> <p>Ms McLean's Job Description has been submitted as evidence. This clearly shows that she has responsibility for records management within the Commission.</p> <p>The Records Management Policy, which has been submitted as evidence under Element 3, also confirms Ms McLean as the Records Manager for the Commission.</p> <p>Samples of the records management training undertaken, or soon to be undertaken, by Ms McLean have also been provided as evidence. The Keeper commends this commitment to providing relevant staff with appropriate training.</p> <p>The Keeper agrees that an appropriate individual has been identified to take operational responsibility for records management as required by the PRSA.</p>
3. Policy	G	G	<p>The RMP states that the Commission is expected to follow the Scottish</p>

<p><i>Compulsory element</i></p>			<p>Government’s Code of Practice on Records Management as required by the Freedom of Information (Scotland) Act 2002. The Commission recognises that its obligations under the Public Records (Scotland) Act 2011 are broadly aligned with those identified in the Code of Practice. As such, the Commission has created a Records Management Policy which outlines its corporate approach to records management.</p> <p>The Policy has been submitted to the Keeper. It is version 1.0 and approved on 20 July 2016. It defines the roles and responsibilities of staff in complying with the Policy. It describes the Commission’s overarching corporate approach to records management. It also provides a commitment to ensuring staff are provided with appropriate training so that they are aware of their records management responsibilities.</p> <p>The RMP states that the Policy is available to staff on the Commission’s intranet. A screenshot has been provided evidencing this.</p> <p>Also provided as evidence is a Data Set and Security Classification Workshop Discussion document which highlighted the importance of records management and was used as a way of raising awareness of records management issues.</p> <p>In addition to workshops, the Commission intends to develop a programme of induction and on-going refresher training. The Keeper commends this commitment to training staff in their records management responsibilities and requests that he is sent a sample of this training once it has been developed and rolled out.</p> <p>The Keeper agrees that the Commission has an operational records management policy statement and that there is a commitment to ensuring staff are aware of their record-keeping obligations.</p>
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<p>4. Business Classification</p>	<p>A</p>	<p>G</p>	<p>The Commission has submitted its combined Draft Business Classification Scheme (BCS) and Retention Schedule. The RMP states that it is still under development. The Commission has also submitted its Records Management Work Plan as evidence which shows that the development of the BCS/Retention Schedule is likely to be completed by the end of 2016 and that full roll-out and implementation of this is estimated to be completed by May 2018. The Keeper requests that he is kept informed of the progress of this work as it moves forward.</p> <p>The Records Management Work Plan which was submitted separately to the Keeper is accompanied by a letter from Ms Russell (see Element 1) stating the Commission's commitment to continual improvement in areas that require development.</p> <p>The Draft BCS/Retention Schedule follows a three level functional model. This must remain a business decision for public authorities but this functional structure is currently recognised as best practice as it is more resilient to organisational change. The Keeper also commends the Commission's intention to develop a joint BCS/Retention Schedule as this should be more effective as a business tool as it can be used as a central point of reference for staff.</p> <p>The Draft BCS/Retention Schedule also identifies the records series' security classification, the asset owner, the retention period and disposal action, its location and whether it is a vital record or not. This appears to be a comprehensive document and the Keeper recognises the amount of work that has undoubtedly gone into preparing it, but this will provide the foundation for the Commission's records keeping arrangements for the foreseeable future.</p> <p>The Keeper can agree this Element on an 'improvement model' basis. This</p>
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			means that the authority has identified a gap in provision (the lack of an organisation-wide operational BCS) and has evidenced a commitment to closing this gap and the timescales for undertaking this work. As part of this agreement, the Keeper requests that he is kept informed of the progress of this work.
5. Retention schedule	A	G	<p>Please see comments above (Element 4) regarding the joint BCS/Retention Schedule.</p> <p>The RMP states that once the BCS/Retention Schedule has been rolled out, individuals in each business area will be identified to take responsibility for ensuring compliance with the requirements of the schedule. This will assist records management staff to implement the schedule in practice across the organisation.</p> <p>The Commission has also submitted its Records Retention Policy which describes its procedures for the retention, storage, retrieval and destruction of records.</p> <p>The Keeper can agree this Element on an ‘improvement model’ basis. This means that the authority has identified a gap in provision (the lack of an organisation-wide operational retention schedule) and has evidenced a commitment to closing this gap and the timescales for undertaking this work. As part of this agreement, the Keeper requests that he is kept informed of the progress of this work.</p>
6. Destruction Arrangements <i>Compulsory element</i>	A	G	<p>The Commission has outlined its procedures in place for the secure destruction of records at the end of their retention periods. These are as follows:</p> <p>Paper – The Commission has in place a contract with a commercial confidential waste shredding provider (Shred-It). A copy of the Customer Service Agreement has been supplied as evidence. Shred-It provides secure consoles into which staff</p>

			<p>place confidential waste. These consoles are emptied on a regular basis (generally every six weeks) and the contents are destroyed off-site. Certificates are provided to the Commission as proof that these records have been securely destroyed. Sample destruction certificates have been provided as evidence. The RMP states that at present it does not keep a record of destroyed paper files but that this will be built in to the retention schedule once finalised.</p> <p>Electronic – Although it is not explicitly stated, it would appear that the destruction of electronic records, for example on SharePoint, is built in to the project to develop and roll out the retention schedules. Individuals will be identified who will be responsible for implementing the requirements of the retention schedule in local business areas and for applying these consistently across the organisation. The Keeper would be interested to know whether the deletion of electronic records will be automated or if the system will prompt staff to delete records and whether the Records Manager is then responsible for deleting them or whether this will be managed locally, but with oversight of the Records Manager. The RMP states that at present the destruction of electronic files is not formally recorded, but this will become standard practice once the retention procedures become operational. The Keeper requests that he is regularly updated on the progress of this work.</p> <p>Hardware – The RMP describes the procedures in place for the destruction of data held on obsolete hardware. Once a piece of hardware, such as a PC, laptop, server, or hard drive, is no longer fit for purpose it is cleared of data by the Commission’s IT staff. An inventory of obsolete hardware is maintained by the Commission and this has been supplied as evidence. The hardware is then securely destroyed by an external contractor. The contractor then provides the Commission with a certificate as proof of destruction. A sample destruction certificate has been supplied as evidence.</p>
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			<p>Back-ups – The RMP outlines the arrangements for the deletion/overwriting of electronic records held on back-ups. Deleted records held on-site are retained for 3 months, after which all copies of deleted information are permanently erased. Electronic records maintained off-site include SharePoint data, which is maintained for 3 months after deletion before being permanently destroyed, and email data, which is kept for a maximum of 44 days before become permanently unavailable. Samples of the Service Level Agreement with Dataspace and destruction certificate have been supplied as evidence of the secure destruction of records maintained off-site.</p> <p>The Keeper can agree this Element on an ‘improvement model’ basis. This means that the authority has identified a gap in provision (the destruction of electronic records) and has evidenced a commitment to closing this gap. As a condition of this agreement, the Keeper will need to be kept updated on the progress of the work to close this gap and further information about the proposed processes for the deletion of electronic records.</p>
<p>7. Archiving and Transfer <i>Compulsory element</i></p>	<p>G</p>	<p>G</p>	<p>The RMP identifies the National Records of Scotland (NRS) as the archive to which it plans to transfer records selected for permanent preservation. The Keeper agrees that this is a suitable place of deposit.</p> <p>The Commission has submitted a signed Memorandum of Understanding (MoU) which has been agreed after negotiation with NRS Client Management staff. This negotiation between the Commission and NRS has been provided as evidence in the form of an email string. The MoU sets out the arrangements for transferring records selected for archiving to NRS at the appropriate times.</p> <p>The Keeper agrees that there are arrangements in place to transfer archival records to a suitable archive.</p>
<p>8. Information</p>	<p>G</p>	<p>G</p>	<p>The RMP outlines the procedures in place to maintain the security of the</p>

<p>Security <i>Compulsory element</i></p>			<p>Commission’s information. These consist of the following:</p> <p>On-site – The RMP states that the Commission shares its premises with other organisations and access to these premises is controlled by a fob system. The fob system is also used to control access to the Commission’s offices within the building. Access to the IT server room is restricted to the IT Manager, IT Assistant and the Office Manager and this is again controlled by a fob system. The building is protected by CCTV and an alarm system which is managed by Westguard Security. Details of their arrangements have been supplied in the form of an email string.</p> <p>The Commission’s PCs are also secured using industry standard Kensington lock cables.</p> <p>The Commission’s IT systems are protected by a firewall and multi-layer security software. Access permissions are in place through the Windows Active Directory which is used to restrict access to Commission systems to staff who are authorised. A username and password is required for staff to gain access to relevant systems. Remote access to Commission systems is provided through an encrypted mobile device. These controls are managed by IT staff.</p> <p>The RMP also details the system of back-ups which are in place. Data held on-site is backed up on a daily, weekly and monthly basis and retained for a maximum of 3 months as part of the Commissions business recovery processes. The back-ups are managed by a third party (see Element 6 for details).</p> <p>Off-site – The commission uses the Microsoft Office 365 cloud platform for managing its SharePoint and email data. The RMP states that the system uses the defence-in-depth approach for security provision enhanced by user and admin controls.</p>
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			<p>The RMP states that data centres are monitored around the clock, there are stringent access controls to the data centres and customer data is made unintelligible to staff who have access to the data centre. Robust controls are in place to prevent unauthorised and malicious accessing the form of encryption (both on servers and while any data is in transit) and monitoring the integrity of data. Details of the off-site back-up procedures have also been identified through the RMP.</p> <p>All new staff are provided with a copy of the IT Systems Acceptable Use and Notice of Monitoring Policy, which has been supplied as evidence. The Policy governs the use of the internet, email and social media as well as making them aware that their use of these will be monitored and any breach of the Policy may be subject to disciplinary action. Staff are required to sign the Policy as evidence that they have read and understood it and it is retained in personnel files.</p> <p>Also submitted as evidence is the Commission's IT Security Policy. This Policy sets out the standards in place for Commission staff in areas such as remote working, the use of mobile devices, internet and email use, password management, and raising awareness of copyright issues.</p> <p>The Commission has also submitted its Ipad Iphone Policy. The use of these devices is intended to enable more flexible working. The Policy governs the physical security measures to be employed when using these devices and also for the remote use of Commission systems.</p> <p>The above policies are available to staff on the Commission's intranet. A screenshot of where these sit has been submitted as evidence that staff can access these and are therefore aware of their responsibilities.</p> <p>The Keeper agrees that there are robust procedures in place to protect the</p>
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			information created and managed by the Commission.
9. Data Protection	G	G	<p>The RMP shows that the Commission is aware of the importance of complying with the Data Protection Act 1998. Its main reason for collecting personal data is for the administration of its HR business. The Commission has submitted its Data Protection Policy. This outlines the organisational commitment to complying with the Act when processing personal and sensitive information and includes guidance on dealing with Subject Access Requests. The Policy is available to staff on the Commission's intranet and a screenshot has been supplied as evidence of this. The Policy is also given to new members of staff at induction.</p> <p>The Commission is also registered as a Data Controller with the Information Commissioner's Office (registration number Z2094773). A copy of the registration certificate and the registration entry details have been provided as evidence.</p> <p>The Commission's website also contains a Privacy Policy which outlines its approach to data protection to its stakeholders.</p> <p>The Keeper agrees that the Commission is aware of its responsibilities under the Data Protection Act 1998.</p>
10. Business Continuity and Vital Records	G	G	<p>The Council has a Business Continuity Plan (BCP) in order to maintain its ability to provide its stakeholders with services should there be a disruption to its systems. The BCP has been submitted as evidence.</p> <p>The BCP states that the Commission has an Emergency Coordination Team (ECT) which is responsible for managing any emergency, liaising with staff and stakeholders and overseeing the return of business critical systems. The BCP defines the responsibilities of the ECT. The RMP states that the ECT has undergone training in incident management.</p> <p>The procedures for invoking the BCP are described as are the actions to be taken.</p>

			<p>The RMP states that the BCP has been reviewed by the Commission’s lawyers and the Audit Committee and is available to staff on the intranet. This is confirmed in a screenshot submitted as evidence.</p> <p>The electronic records back-up procedures are outlined in the RMP and records held both on-site and off-site are recoverable quickly in the event of an interruption to normal business patterns. The Commission has a contract with a disaster recovery provider ITFA Ltd to ensure that on-site data can be recovered. A copy of the Service Agreement governing this arrangement for 2016-2017 has been supplied as evidence.</p> <p>The IT recovery procedures are tested on an annual basis to ensure that these work as expected.</p> <p>The RMP states that there are very few vital paper records and there are no procedures in place to ensure that these can be accessed when required. This will continue to be reviewed on an on-going basis. The Keeper accepts this explanation.</p> <p>Vital records are being identified and included as part of the work to develop and roll out the combined BCS/Retention Schedule. Given that most of the Commission’s work is undertaken electronically, the Keeper is assured that vital records are made available as part of the IT recovery process.</p> <p>The Keeper agrees that the Commission has an operational BCP and that vital records are being identified as part of a longer-term development of a joint BCS/Retention Schedule.</p>
11. Audit trail	A	G	<p>The RMP states that any incoming mail is logged onto a mail-logging system before being scanned onto SharePoint. The mail is then filed and is subject to the requirements of the Retention Schedule.</p>

			<p>The Commission maintains a relatively small quantity of paper personnel and finance records. These are stored in secure locked cabinets with access restricted to the Office Manager, Financial Controller and Financial Officer. The Keeper can accept that due to the relatively small quantities of paper records being managed and the strictly controlled access to these that it would be unreasonable to expect the Commission to develop a system to track the movement of these records.</p> <p>The RMP states that electronic records are currently stored on a shared drive network structure based on the Commission’s business areas. The records and information stored in this system has now been set as ‘read only’ as the Commission intends to move its system to a cloud based SharePoint system using Office 365. Access to folders and files is limited to those in the relevant business areas. A screenshot has been submitted as evidence of the permissions that are in place. The only data that is editable is that used by the Finance Team, access to which is controlled by an additional layer of password access control. Audit trail provision is available on the financial system used by Finance staff. Screenshots of the permissions and the transactions that are in operation have been supplied as evidence.</p> <p>As part of the move to Office 365 in 2015, the use of SharePoint allows the Commission to audit the changes made and access to records held on this system. The RMP states that the functionality of the system allows administrators to retrieve a rolling 90 day audit trail for records. A screenshot of the auditable actions available on the SharePoint system has been provided.</p> <p>The RMP also states that it intends to develop file naming conventions as part of the Commission’s corporate style guidance. This is built in to the Records Management Work Plan with an estimated completion date of the end of 2017. The Keeper requests that he is sent this guidance once it has been developed and is operational.</p>
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			<p>The Keeper can agree this Element on an ‘improvement model’ basis. This means that the authority has identified a gap in provision (lack of a consistent method of naming documents) and has evidenced a commitment to closing this gap. As a condition of his agreement, the Keeper requests that he is kept informed of the work as it progresses.</p>
<p>12. Competency Framework for records management staff</p>	<p>A</p>	<p>G</p>	<p>It would be unreasonable of the Keeper to expect an authority the size of the Commission to employ a professional Records Manager. As such the operational responsibility for records management forms part of the duties of the Finance Officer and Personal Assistant (see Element 2). This is confirmed in her Job Description which has been supplied as evidence. As a result, records management activities will form a part of the Records Manager’s annual appraisal.</p> <p>The Records Manager has, along with two colleagues, undertaken records management training provided by PDP Training.</p> <p>Samples of the records management training undertaken, or soon to be undertaken, by Ms McLean have also been provided as evidence.</p> <p>Also provided as evidence is a screenshot of the Civil Service Learning page which shows that the Records Manager has completed a Responsible for Information online module.</p> <p>The Records Management Work Plan, which is built in to the RMP, has the provision of guidance for staff and the production of staff training programmes as key objectives. The Keeper commends this commitment to training and request that he is sent a sample of the staff guidance and training when it becomes available.</p> <p>The Keeper can agree this Element on an ‘improvement model’ basis. This</p>

			<p>means that the Commission recognises that records management forms a key work area of relevant staff and the appointed records manager has access to relevant training and has identified the training of staff as a key objective and has outlined the timescale for developing a programme of training and guidance in records management for all staff. As part of this agreement, the Keeper requests that he is provided with examples of staff training and guidance documents once this has been created and is operational.</p>
<p>13. Assessment and Review</p>	<p>G</p>	<p>G</p>	<p>The RMP describes the procedures in place for assessing and reviewing the Commission’s records management systems to ensure that they are kept up-to-date.</p> <p>The Records Manager (see Element 2) will, along with colleagues, be responsible for carrying out the review of the RMP. Progress or issues will be reported to the Director of Corporate Affairs and Strategy (see Element 1).</p> <p>The Commission has developed a Generally Accepted Records Keeping Principles (GARP) analysis methodology for identifying the current situation with regards to records management. A spreadsheet of the GARP system has been submitted as evidence. This analysis will be used on an annual basis to determine the level of records management provision within the Commission, identifying progress in areas such as retention, disposition and protection. Additionally, the Commission has identified a number of actions to take forward as part of its Records Management Work Plan, which is built into the RMP at Element 5.</p> <p>The RMP also states that it will use its internal auditors to carry out a full review of its RMP after the Keeper has agreed it. Thereafter, the internal auditors will carry out a partial review to ensure that it is complying with its requirements. Submitted as evidence is the internal auditor’s draft work programme for 2016-2017 showing that records management is included. The Keeper commends the use of internal auditors as an effective way of measuring compliance with an authority’s RMP and</p>

			<p>reporting any issues to senior management.</p> <p>The Keeper agrees that there are appropriate procedures in place to ensure that the Commission's RMP and supporting evidence are kept up-to-date.</p>
<p>14. Shared Information</p>	<p>G</p>	<p>G</p>	<p>The RMP states that when it shares information with other bodies the Commission carries out a risk assessment beforehand and complies with the Data Protection Act 1998. The Commission is registered as a Data Controller with the Information Commissioner's Office.</p> <p>The RMP states that the Commission has a number of data sharing agreements in place with other organisations. The Commission has submitted a copy of an Agreement for Cooperation between them and the National Regulator for Public Services for Romania as evidence. Whilst this is an agreement for the two bodies to work together it does contain a clause relating to the sharing of information, agreeing to abide by the laws and regulations in place for each country.</p> <p>The main body with whom the Commission shares information is Scottish Water. This is done using an electronic 'Monitoring' Mailbox which is checked on a daily basis. Two screenshots have been supplied showing the annual structure of the folders within the system and the type of information that is shared between the bodies.</p> <p>The Keeper can agree that when the Commission needs to share information there are procedures in place to allow it to do so securely.</p>

6. Keeper's Summary

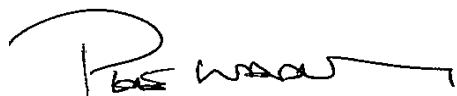
Elements 1-14 that the Keeper considers should be in a public authority records management plan have been properly considered by Water Industry Commission for Scotland. Policies and governance structures are in place to implement the actions required by the plan.

7. Keeper's Determination

Based on the assessment process detailed above, the Keeper agrees the RMP of Water Industry Commission for Scotland.

The Keeper recommends that Water Industry Commission for Scotland should publish its agreed RMP as an example of good practice within the authority and the sector.

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



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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 Water Industry Commission for Scotland. In agreeing this RMP, the Keeper expects Water Industry Commission for Scotland to fully implement the agreed RMP and meet its obligations under the Act.



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Tim Ellis
Keeper of the Records of Scotland