

# **Crown Estate Scotland (Interim Management)**

## **Records Management Plan August 2018**

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## 1. Introduction

The Records Management Plan (RMP) for Crown Estate Scotland (Interim Management) sets out our current and planned future arrangements for the management of our corporate records in compliance with the Public Records (Scotland) Act 2011 (the Act). Crown Estate Scotland (Interim Management) will be referred to as Crown Estate Scotland for the remainder of this document.

### 1.1 The Records Management Plan

The format of the RMP is based on the Model Records Management Plan developed by the Keeper of the Records of Scotland (the Keeper) and the Public Records Stakeholder Forum and published via the National Records of Scotland (NRS) website. The RMP comprises the following 14 elements:

1. Senior management responsibility
2. Records manager responsibility
3. Records management policy statement
4. Business classification
5. Retention schedules
6. Destruction arrangements
7. Archiving and transfer arrangements
8. Information security
9. Data protection
10. Business continuity and vital records
11. Audit trail
12. Competency framework for records management staff
13. Assessment and review
14. Shared information

The RMP is separated into sections based on the 14 elements listed above, each describing how Crown Estate Scotland meets the requirements of the Act and listing the evidence submitted in support of this. We have also included recommendations in the areas requiring additional work.

A list of the evidence submitted to the Keeper in support of the 14 statements of compliance can be found in **Appendix 1**.

### 1.2 Crown Estate Scotland

Crown Estate Scotland is tasked with managing assets that stretch the length and breadth of Scotland. Through working with others, we aim to innovate with land and property to create prosperity for Scotland and its communities.

Crown Estate Scotland's revenue surplus goes to the Scottish Government Consolidated Fund. Our 2017-20 Corporate Plan and 2017-18 Business Plan details our priorities and objectives, and our Framework Document sets out our functions, duties and powers. These are all available on our website.

Crown Estate Scotland is responsible for managing:

- Leasing of virtually all seabed out to 12 nautical miles covering some 750 fish farming sites and agreements with cables & pipeline operators in Scottish waters;
- The rights to lease seabed out to 200 nautical miles for marine and renewable energy generation and gas and carbon storage;
- 37,000 hectares of land with agricultural tenancies, residential and commercial properties and forestry on four rural estates;
- Rights to fish wild salmon and sea trout in rivers and coastal areas, as well as rights to naturally-occurring gold and silver across most of Scotland;
- Around half the foreshore around Scotland including 5,800 moorings and a number of ports and harbours;
- Retail and office investment property.

## 2. Element 1 – Senior Management responsibility

<b>Element</b>	One
<b>Title</b>	Senior management responsibility
<b>Description</b>	Section 1(2)(a)(i) of the Act specifically requires a RMP to identify the individual responsible for the management of the authority's public records. Identify an individual at senior level who has overall strategic accountability for records management.

### 2.1 Introduction

The Act states that it is vital that a RMP has the approval and support of senior management. Element 1 is therefore mandatory, and evidence of compliance must be submitted as part of a RMP.

### 2.2 Statement of Compliance

The Records Management Policy, evidenced at Element 3, states that Crown Estate Scotland's Head of Finance and Commercial has overall responsibility for the management of its public records.

### 2.3 Supporting Evidence

2A - [Letter acknowledging senior management responsibility](#)

### 2.4 Recommendations

No recommendations for improvement are required for Element 1.

### 2.5 Assessment and review

This element will be reviewed by the Business Information Coordinator on an annual basis. A review will also be undertaken in the event of any material, structural or other change which might directly impact Crown Estate Scotland's records management.

### 3. Element 2 – Records Management Responsibility

<b>Element</b>	Two
<b>Title</b>	Records management responsibility
<b>Description</b>	Section 1(2)(a)(ii) of the Act specifically requires a RMP to identify the individual responsible for ensuring the authority complies with its plan. Identify individual within the authority, answerable to senior management, to have day-to-day operational responsibility for records management within the authority.

#### 3.1 Introduction

The Act states that a RMP must identify the individual within an organisation, answerable to senior management, to have operational responsibility for records management. Element 2 is therefore mandatory, and evidence of compliance must be submitted as part of a RMP.

#### 3.2 Statement of Compliance

The Records Management Policy, evidenced at Element 3, states that the Business Information Coordinator has operational responsibility for records management at Crown Estate Scotland.

#### 3.3 Supporting Evidence

[3A - Business Information Coordinator Role Remit](#)

Refer to element one for;

[Letter acknowledging senior management responsibility\(2A\)](#)

#### 3.4 Recommendations

No recommendations for improvement are required for Element 2.

#### 3.5 Assessment and review

This element will be reviewed by the Business Information Coordinator on an annual basis. A review will also be undertaken in the event of any material, structural or other change which might directly impact Crown Estate Scotland's records management.

## 4. Element 3 - Records Management Policy Statement

<b>Element</b>	Three
<b>Title</b>	Records Management Policy Statement
<b>Description</b>	A records management policy statement underpins effective management of an authority's records and information. It demonstrates to employees and stakeholders that managing records is important to the authority and serves as a mandate for the activities of the records manager.

### 4.1 Introduction

The records management policy statement should serve as a mandate for the activities of a Records Manager and provide an overarching statement of an organisation's intentions and position in relation to records management. Element 3 is mandatory and evidence of compliance must be submitted as part of a RMP.

### 4.2 Statement of Compliance

(1) Crown Estate Scotland recognises that effective records management is a key part of its business, protecting corporate records; enabling the successful delivery of Corporate and Business Plans; and ensuring compliance with legal, statutory and regulatory obligations. It operates in a way which is, so far as reasonably practicable, transparent and accountable. Its Records Management Policy allows it to demonstrate this.

(2) The Records Management Policy sets out staff responsibilities in relation to the creation, safekeeping, access, change and disposal of information and the standards to which Crown Estate Scotland records will be managed.

(3) Crown Estate Scotland is currently (August 2018) reviewing its Records Management Policy to ensure that it remains appropriate to current organisational structure and business processes.

### 4.3 Supporting Evidence

[4A - Records Management Policy](#)

### 4.4 Recommendations

We require to finish our review of the Records Management Policy and to deliver training to staff on the refreshed Policy.

### 4.5 Assessment and review

This element will be reviewed by the Business Information Coordinator on an annual basis. A review will also be undertaken in the event of any material, structural or other change which might directly impact Crown Estate Scotland's records management.

## 5. Element 4 - Business Classification

<b>Element</b>	Four
<b>Title</b>	Business Classification
<b>Description</b>	A business classification scheme describes what business activities the authority undertakes, whether alone or in partnership. The Keeper expects an authority to have properly considered business classification mechanisms and its RMP should therefore reflect the functions of the authority by means of a business classification scheme or similar.

### 5.1 Introduction

The Act recognises that a clearly defined business classification is central to good records management provision. A business classification will allow an authority to map its business functions thereby providing a structure for identifying information assets and operating an effective records disposals schedule.

### 5.2 Statement of Compliance

(1) Crown Estate Scotland maintains a business classification scheme which provides a structure for classifying records across the business. The scheme is used in the information asset register maintained for all records in the organisation.

(2) The scheme is primarily function based.

(3) The information asset register is an evolving record and is continually being worked on to ensure that it remains up-to-date and relevant.

### 5.3 Supporting Evidence

[5A - Information asset register](#)

### 5.4 Recommendations

Continue to work on completing and updating the information asset register.

### 5.5 Assessment and review

This element will be reviewed by the Business Information Coordinator on an annual basis. A review will also be undertaken in the event of any material, structural or other change which might directly impact Crown Estate Scotland's records management.

## 6. Element 5 – Retention Schedules

<b>Element</b>	Five
<b>Title</b>	Retention Schedules
<b>Description</b>	Section 1(2)(b)(iii) of the Act specifically requires a RMP to include provision about the archiving and destruction or other disposal of the authority's public records. A retention schedule is a list of records for which pre-determined disposal dates have been established.

### 6.1 Introduction

The Act states that it is vital that an authority has a retention schedule that lists the pre-determined disposal dates for its records. Element 5 is therefore mandatory, and evidence of compliance must be submitted as part of a RMP.

### 6.2 Statement of Compliance

(1) Crown Estate Scotland's current retention policy is no longer appropriate for business need and is being updated. The new retention policy has greater granularity and will be reviewed by each part of the business to ensure that it covers all records held. The new policy also identifies the legal basis for the retention period and the information asset owner. When finalised the Business Information Coordinator will be responsible for ensuring that colleagues are aware of the policy and the need to comply with it.

(2) Data within Crown Estate Scotland does currently hold retention periods but as stated above these are not appropriate need and are being updated. Due to the infancy of the company the retention functionality of our electronic document and records management system (EDRMS) has still to be fully utilised. The system is capable of this function and we have evidenced this.

(3) Crown Estate Scotland has created an information asset register which it will use to build definitive retention periods, this is included in the evidence. The information asset register coupled with the records retention policy will allow Crown Estate Scotland to begin implementing specific retention dates to data held both on and off site.

### 6.3 Supporting Evidence

[6A - Records Retention Policy](#)

[6B - Wisdom Retention potential evidence](#)

Refer to element four for

[Information Asset register \(5A\)](#)

### 6.4 Recommendations

The records retention policy will be completed and implemented. We are currently working on implementing the full functionality of our EDRMS system and will engage in formal training with our system provider to do this.

### 6.5 Assessment and review

This element will be reviewed by the Business Information Coordinator on an annual basis. A review will also be undertaken in the event of any material, structural or other change which might directly impact Crown Estate Scotland's records management.

## 7. Element 6 – Destruction Arrangements

Element	Six
Title	Destruction Arrangements
Description	Section 1(2)(b)(iii) of the Act specifically requires a RMP to include provision about the archiving and destruction, or other disposal, of an authority's public records. It is not always cost-effective or practical for an authority to securely destroy records in-house. Many authorities engage a contractor to destroy records and ensure the process is supervised and documented.

### 7.1 Introduction

The Act states that a RMP must include arrangements for the secure destruction of records in accordance with legal, statutory and regulatory obligations. Element 6 is therefore mandatory and evidence of compliance must be submitted as part of a RMP.

### 7.2 Statement of Compliance

(1) Crown Estate Scotland is aware that the destruction of records is an area which requires attention. Retention schedules are still to be implemented and when this has been completed we will look at the destruction of records. We have investigated the development of this process and as evidence we have included the request forms and an example of a destruction certificate that would be received. Furthermore, we have engaged with our EDRMS provider in order to develop our knowledge of the retention function. Included as evidence is the training engagement.

(2) Sensitive and confidential paper waste in the office is destroyed using shredders and this function is overseen by a commercial disposal firm, their practices are fully compliant with current environmental regulations. Crown Estate Scotland has included its service agreement, the destruction schedule and a destruction certificate from the disposal firm as evidence.

(3) Crown Estate Scotland's IT support partners, Consilium UK, manage the disposal of end of life IT hardware. Consilium work with TES, a leader in providing solutions to help customers manage the retirement of Information Technology (IT) assets. Included as evidence is the arrangement with Consilium.

### 7.3 Supporting Evidence

[7A - Changeworks Agreement](#)

[7B - Cube Agreement](#)

[7C - Consilium hardware destruction](#)

[7D - Destruction request form Cube](#)

[7E - Destruction Certificate Cube](#)

[7F - Changeworks destruction schedule](#)

[7G - Changeworks destruction certificate](#)

[7H - Daisy Training Engagement](#)

### 7.4 Recommendations

As previously stated the implementation of a retention policy is a business priority, following this a destruction schedule will be created. Our EDRMS system allows us to set up retention periods to documents which will in turn allow us to create a destruction policy.

### 7.5 Assessment and review

This element will be reviewed by the Business Information Coordinator on an annual basis. A review will also be undertaken in the event of any material, structural or other change which might directly impact Crown Estate Scotland's records management.

## 8. Element 7 – Archiving and Transfer Arrangements

<b>Element</b>	Seven
<b>Title</b>	Archiving and transfer arrangements
<b>Description</b>	Section 1(2)(b)(iii) of the Act specifically requires a RMP to make provision about the archiving and destruction, or other disposal, of an authority's public records. This is the mechanism by which an authority transfers records of enduring value to an appropriate archive repository, specifying the timing of transfers and other terms and conditions.

### 8.1 Introduction

The Act states that a RMP must include arrangements for the archiving of records of enduring value. Element 7 is therefore mandatory, and evidence of compliance must be submitted as part of a RMP.

### 8.2 Statement of Compliance

(1) Crown Estate Scotland's records are archived at an offsite storage facility, Cube Datastore. Each document is catalogued in a tracker and users can request the transfer of an item or request items to be scanned via the Business Information Coordinator.

(2) Records that are recalled from the store are delivered to the requester and left in their safekeeping until returned.

(3) Cube Datastore will carry out the destruction of documents when requested.

(4) Electronic records are stored on Wisdom, our electronic document management system. Our Wisdom system is backed up daily and documents currently remain live until the point of disposal.

### 8.3 Supporting Evidence

[8A - Archiving information](#)

[8B - Archiving request form deposit](#)

[8C – Archiving request form withdrawal](#)

Refer to element 6 for:

[Destruction request form \(7D\)](#)

[Destruction certificate Cube \(7E\)](#)

### 8.4 Recommendations

Crown estate Scotland will implement retention policies which will provide schedules for the effective and timely archiving of records.

### 8.5 Assessment and review

This element will be reviewed by the Business Information Coordinator on an annual basis. A review will also be undertaken in the event of any material, structural or other change which might directly impact Crown Estate Scotland's records management.

## 9. Element 8 – Information Security

<b>Element</b>	Eight
<b>Title</b>	Information Security
<b>Description</b>	<p>Section 1(2)(b)(ii) of the Act specifically requires a RMP to make provision about the archiving and destruction or other disposal of the authority's public records. An authority's RMP must make provision for the proper level of security for its public records.</p> <p>Information security is the process by which an authority protects its records and ensures they remain available. It is the means by which an authority guards against unauthorised access and provides for the integrity of the records. Robust information security measures are an acknowledgement that records represent a risk as well as an asset. A public authority should have procedures in place to assess and contain that risk.</p>

### 9.1 Introduction

The Act states that a RMP must make provision for the proper level of security for its public records. Element 8 is therefore mandatory and evidence of compliance must be submitted as part of a RMP.

### 9.2 Statement of Compliance

(1) Crown Estate Scotland has an Information Security policy which contains information on security and use of equipment, use of software, passwords, encryption, information management, secure use of encrypted USB flash drives and legal obligations. The Information Security policy will be reviewed annually and approved by the Chief Executive.

(2) Crown Estate Scotland has achieved Cyber Essentials certification which confirms that it has the infrastructure and software in place for the most common internet-based threats to cyber security. It is a member of the Cybersecurity Information Sharing Partnership (CISP) and through this network is notified of cyber related matters and early warning of risks to security.

### 9.3 Supporting Evidence

[9A - Information security policy](#)

[9B - Cyber Essentials Certification](#)

### 9.4 Recommendations

IT Security policy and Cyber Security awareness will be included as part of the new employee induction. Training will also be delivered to those staff members who did not receive this during induction.

### 9.5 Assessment and review

This element will be reviewed by the Business Information Coordinator on an annual basis. A review will also be undertaken in the event of any material, structural or other change which might directly impact Crown Estate Scotland's records management.

## 10. Element 9 – Data Protection

<b>Element</b>	Nine
<b>Title</b>	Data Protection
<b>Description</b>	An authority that handles personal information about individuals has a number of legal obligations to protect that information under the Data Protection Act 1998. The Keeper will expect an authority's RMP to indicate compliance with its data protection obligations.

### 10.1 Introduction

The Act states that an organisation's RMP should show that the organisation is compliant with its data protection obligations for the proper management of personal information.

### 10.2 Statement of Compliance

(1) The introduction of the EU General Data Protection Regulation and the Data Protection Act 2018 in May 2018 strengthened the framework of rights for data subjects and imposed new duties and obligations on data controllers and processors in relation to the collection, use and retention of personal data. Crown Estate Scotland has a Data Protection Policy which sets out its commitment to compliance with data protection legislation. Initial staff training has been delivered and further training for all staff will be undertaken, including mandatory online training.

(2) Crown Estate Scotland's Data Protection Officer is responsible for overseeing Crown Estate Scotland's data protection policy and procedures to ensure compliance with data protection legislation.

(3) Privacy notices are published on Crown Estate Scotland's website informing people of what to expect when Crown Estate Scotland collects, receives or processes their personal information and their rights in relation to that information.

### 10.3 Supporting Evidence

[10A Data protection policy](#)

[10B - Data Protection Register](#)

[10C - Privacy Notices](#)

### 10.4 Recommendations

We will continue to develop our data protection policies and procedures to ensure our continued compliance with data protection legislation and that all staff are fully trained

### 10.5 Assessment and review

This element will be reviewed by the Business Information Coordinator on an annual basis. A review will also be undertaken in the event of any material, structural or other change which might directly impact Crown Estate Scotland's records management.

## 11. Element 10 - Business Continuity & Vital Records

<b>Element</b>	Ten
<b>Title</b>	Business Continuity & Vital Records
<b>Description</b>	A business continuity and vital records plan serves as the main resource for the preparation for, response to, and recovery from, an emergency that might affect any number of crucial functions in an authority.

### 11.1 Introduction

The Act recognises that certain records held by an organisation will be vital to its business functions. Therefore, a RMP should set out reasonable procedures for vital records to be accessible in the event of an emergency affecting business premises or systems.

### 11.2 Statement of Compliance

Crown Estate Scotland has in place business continuity arrangements including a Business Continuity Plan and an IT Recovery Plan for the recovery of essential business services if a serious incident were to occur that would affect daily business operations. Its plan details the priority in which systems and services would be recovered including our electronic records management system.

### 11.3 Supporting Evidence

[11A - Extracts from the business continuity plan](#)

[11B - IT Recovery Plan](#)

### 11.4 Recommendations

Crown Estate Scotland aim to provide training to all staff on the Business Continuity plan and this will also be mandatory for new staff at induction. It also acknowledges the need for the development of a vital records plan.

### 11.5 Assessment and review

This element will be reviewed by the Business Information Coordinator on an annual basis. A review will also be undertaken in the event of any material, structural or other change which might directly impact Crown Estate Scotland's records management.

## 12. Element 11 – Audit Trail

<b>Element</b>	Eleven
<b>Title</b>	Audit trail
<b>Description</b>	An audit trail is a sequence of steps documenting the movement and/or editing of a record resulting from activities by individuals, systems or other entities. The Keeper will expect an authority's RMP to provide evidence that the authority maintains a complete and accurate representation of all changes that occur in relation to a particular record.

### 12.1 Introduction

The Act recognises that audit trails for records, whether digital or paper-based, will assist an organisation to ensure that its records are authentic, reliable, accessible and complete. Therefore, provision should be made within a RMP to manage record movement and version control.

### 12.2 Statement of Compliance

(1) Crown Estate Scotland ensures that the location of records is known always. Movement of these records around either an electronic system or between physical storage can be monitored however the development of a reporting system is required.

(2) Due to business requirements some paper records are held temporarily in house, all others are held by an offsite storage provider. The movement of these paper records are maintained in several ways. These methods include a locally held master tracker which details the movement of paper documentation in and out of the office. It also details what has been scanned and returned as an electronic copy. Furthermore, our storage provider holds a local system which mirrors this tracking, this can be used as a backup at any time.

(3) The majority of electronic data is held on our electronic data management system (EDRMS), we also utilise a local server drive to hold records when appropriate. The system holds the functionality to provide a full audit and reporting function however this is something that needs further investigation. The movement and alteration of documents can be tracked as the system can view aspects such as version control, alteration dates and ownership details.

### 12.3 Supporting Evidence

[12A - Crown Estate Scotland Master tracker](#)

[12B - EDRMS home page](#)

[12C - EDRMS Audit Potential evidence](#)

### 12.4 Recommendations

Crown Estate Scotland would recommend two main actions. Firstly, that our Records Management Policy is updated and staff awareness and training in relation to the policy is delivered to current staff and to all new employees. This will promote efficient management of records and promote security and consistency in our data management. Furthermore, we acknowledge the need for a robust audit process with regards to electronic documents held on EDRMS. Our EDRMS has the potential to offer these features and this is something we will implement. We are also investigating the potential of software which will allow us

to work directly from the offsite storage providers database. This will eliminate the need for local trackers and input errors

### **12.5 Assessment and review**

This element will be reviewed by the Business Information Coordinator on an annual basis. A review will also be undertaken in the event of any material, structural or other change which might directly impact Crown Estate Scotland's records management.

## 13. Element 12 - Competency Framework for Records Management Staff

<b>Element</b>	Twelve
<b>Title</b>	Competency Framework for Records Management Staff
<b>Description</b>	A competency framework lists the core competencies and the key knowledge and skills required by a records manager. It can be used as a basis for developing job specifications, identifying training needs, and assessing performance.

### 13.1 Introduction

The Act recognises that records management is best implemented by a person or persons possessing the relevant skills. This is to ensure that the day-to-day operation of activities described in a RMP can be carried out successfully and to a high standard.

### 13.2 Statement of Compliance

(1) The day to day aspects of the RPM will be overseen by the Business Information Coordinator. The roles and responsibilities of the Business Information Coordinator have been outlined and the job role has been included as supporting evidence. The Business Information Coordinator will set annual objectives in relation to the Records Management Plan and will take part in regular performance review meetings.

(2) Crown Estate Scotland has become a corporate member of the Records Management Society. This will aid the Business Information Coordinator to identify and implement continuous improvement and their development in the role, allowing for interaction and networking with other public-sector bodies.

### 13.3 Supporting Evidence

[13A - IRMS Membership](#)

[13B - Business Scorecard](#)

Refer to element two for:

[Business Information coordinator role remit \(3A\)](#)

### 13.4 Recommendations

We are currently developing our records management policy for employees. We are working closely with Human Resources colleagues to include policies which should be included during the new employee induction process and to identify the review process for such policies, the Business Information Coordinator will support in this task.

### 13.5 Assessment and review

This element will be reviewed by the Business Information Coordinator on an annual basis. A review will also be undertaken in the event of any material, structural or other change which might directly impact Crown Estate Scotland's records management.

## 14. Element 13 - Review and Assessment

<b>Element</b>	Thirteen
<b>Title</b>	Review and Assessment
<b>Description</b>	Section 1(5)(i)(a) of the Act says that an authority must keep its RMP under review. An authority's RMP must describe the procedures in place to regularly review it in the future.

### 14.1 Introduction

The Act states that regular self-assessment and review of records management provision will give an organisation a clear statement of the extent that its records management practices conform to their RMP.

### 14.2 Statement of Compliance

(1) Following final submission of the Records Management Plan it would be Crown Estate Scotland's intention to review the plan at regular quarterly intervals. It is its belief however that the development of internal policies and procedures will trigger ad-hoc reviews and updates for the foreseeable future.

(2) Furthermore, Crown Estate Scotland proposes to widen the remit of its IT user group to now include data. This group meets monthly to review, discuss and develop business issues relating to IT and data.

### 14.3 Supporting Evidence

[14A - Terms of reference IT & Data user group](#)

### 14.4 Recommendations

It is our recommendation that review dates are built into each policy aligning to the records management policy. Furthermore, the records management plan itself will be reviewed initially when it is returned from National Records of Scotland and then during the user group meetings.

### 14.5 Assessment and review

This element will be reviewed by the Business Information Coordinator on an annual basis. A review will also be undertaken in the event of any material, structural or other change which might directly impact Crown Estate Scotland's records management.

## 15. Element 14 – Shared Information

<b>Element</b>	Fourteen
<b>Title</b>	Shared Information
<b>Description</b>	Under certain conditions, information given in confidence may be shared. Most commonly this relates to personal information, but it can also happen with confidential corporate records. The Keeper will expect an authority's RMP to reflect its procedures for sharing information.

### 15.1 Introduction

The Act states that an organisation's RMP must show that they have considered the implications of information sharing on effective records management provision.

### 15.2 Statement of Compliance

(1) Members of staff are given training on Data Protection, EDRMS and Social Media on induction. This ensures an understanding and a responsibility is promoted when considering information sharing.

(2) Crown Estate Scotland has an Information security Incident Process. This evidences our understanding of the risk involved in data sharing. Included as evidence are the above mentioned working documents; Social Media Policy, Data Protection Policy and Information Sharing Incident Process.

(3) Crown Estate Scotland is discussing the development of our Memorandum on Information Sharing with National Records for Scotland. Correspondence is included as evidence.

(4) Crown Estate Scotland is looking to develop open data principles within our information sharing policy to give guidance, when applicable, on sharing open data as well as the potential risks and challenges.

### 15.3 Supporting Evidence

[15A - Social Media Policy](#)

[15B - MOU with NRS](#)

[15C - Information Security Incident process guidance](#)

Refer to element 9 for;

[Data Protection Policy \(10A\)](#)

### 15.4 Recommendations

We understand the importance of the development of an information sharing policy to ensure safe and secure information sharing. As evidence, we already have a number of working documents which will contribute to the information sharing policy and we will continue to build upon this to further improve data security.

### 15.5 Assessment and review

This element will be reviewed by the Business Information Coordinator on an annual basis. A review will also be undertaken in the event of any material, structural or other change which might directly impact Crown Estate Scotland's records management.

## Appendix 1: Evidence List

<b><u>Element</u></b>	<b><u>Evidence</u></b>
<b><u>Element 1</u></b>	<a href="#">2A - letter acknowledging senior management responsibility</a>
<b><u>Element 2</u></b>	<a href="#">3A - Business Information Coordinator Role Remit</a>
<b><u>Element 3</u></b>	<a href="#">4A - Records Management Policy</a>
<b><u>Element 4</u></b>	<a href="#">5A - Information Asset Register</a>
<b><u>Element 5</u></b>	<a href="#">6A - Records Retention Policy</a>
<b><u>Element 5</u></b>	<a href="#">6B - Wisdom Retention potential evidence</a>
<b><u>Element 6</u></b>	<a href="#">7A - Changeworks Agreement</a>
<b><u>Element 6</u></b>	<a href="#">7B - Cube Agreement</a>
<b><u>Element 6</u></b>	<a href="#">7C - Consilium hardware destruction</a>
<b><u>Element 6</u></b>	<a href="#">7D - Destruction request form Cube</a>
<b><u>Element 6</u></b>	<a href="#">7E - Destruction certificate Cube</a>
<b><u>Element 6</u></b>	<a href="#">7F - Changeworks destruction schedule</a>
<b><u>Element 6</u></b>	<a href="#">7G - Changeworks destruction certificate</a>
<b><u>Element 6</u></b>	<a href="#">7H - Daisy Training Engagement</a>
<b><u>Element 7</u></b>	<a href="#">8A - Archiving information</a>
<b><u>Element 7</u></b>	<a href="#">8B - Archiving request form deposit</a>
<b><u>Element 7</u></b>	<a href="#">8C - Archiving request form withdrawal</a>
<b><u>Element 8</u></b>	<a href="#">9A - Information security policy</a>
<b><u>Element 8</u></b>	<a href="#">9B - Cyber Essentials Certification</a>
<b><u>Element 9</u></b>	<a href="#">10A - Data protection policy</a>
<b><u>Element 9</u></b>	<a href="#">10B - Data Protection Register</a>
<b><u>Element 9</u></b>	<a href="#">10C - Privacy Notices</a>
<b><u>Element 10</u></b>	<a href="#">11A - Extracts from the business continuity plan</a>
<b><u>Element 10</u></b>	<a href="#">11B – IT Recovery Plan</a>
<b><u>Element 11</u></b>	<a href="#">12A - Crown Estate Scotland Master tracker</a>
<b><u>Element 11</u></b>	<a href="#">12B - EDRMS home page</a>
<b><u>Element 11</u></b>	<a href="#">12C - EDRMS Audit potential evidence</a>
<b><u>Element 12</u></b>	<a href="#">13A - IRMS Membership</a>
<b><u>Element 12</u></b>	<a href="#">13B - Business Scorecard</a>
<b><u>Element 13</u></b>	<a href="#">14A - Terms of reference IT &amp; Data user group</a>
<b><u>Element 14</u></b>	<a href="#">15A - Social Media Policy</a>
<b><u>Element 14</u></b>	<a href="#">15B - MOU with NRS</a>
<b><u>Element 14</u></b>	<a href="#">15C - Information Sharing Incident process guidance</a>