Public Records (Scotland) Act 2011

Scottish Water
Assessment Report

The Keeper of the Records of Scotland

14th February 2017

Contents

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 Water** by the Public Records (Scotland) Act 2011 Assessment Team following its submission to the Keeper on **20th July 2016.**

The assessment considered whether the RMP of Scottish Water 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 Scottish Water complies with the Act can be found under section 7 of this report with relevant recommendations.

3. Authority Background

Scottish Water are a publicly owned company, answerable to the Scottish Parliament. They are responsible for providing water and waste water services to household customers and wholesale licensed providers. They provide 1.34 billion litres of drinking water every day and take away 847 million litres of waste water daily. Scottish Ministers set the objectives for Scottish Water and appoint the Chair and non-executive members. Scottish Water delivers the investment priorities of Ministers within the funding allowed by the Water Industry Commission for Scotland.

Scottish Water Solutions is an innovative partnership helping deliver Scottish Water's capital investment programme.

Scottish Water Business Stream was formed in 2006 to compete in the retail market for business consumers. Scottish Water acts as a wholesaler in the non-household market.

Scottish Water International uses skills and expertise from its Scottish business to offer services to utilities, governments and international clients seeking to harness their water resources efficiently and effectively by raising standards and reducing costs.

Scottish Water Horizons is a wholly owned subsidiary of Scottish Water responsible for driving forward Scottish Water's green agenda, developing renewables and leveraging commercial value from assets.

http://www.scottishwater.co.uk/

4. Keeper's Assessment Process

The RMP was assessed by the Public Records (Scotland) Act Assessment Team on behalf of the Keeper. Assessors used the checklist elements listed in section 5, to establish whether *[named public authority'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.

5. Model Plan Elements: Checklist

Element	Present	Evidence	Notes
1. Senior Officer *Compulsory element*	**G**	**G**	Scottish Water have identified Rob Mustard, Chief Information Officer & Director of Technology, Information & Business Change as the individual in the authority with overall responsibility for records management. This identification is supported by the *Chief Information Officer Role in Information Management* document dated June 2016 which has been provided to the Keeper. The identification of the Chief Information Officer with Executive level information governance responsibilities is confirmed by the *Records Management Policy* **(see element 3)** page 4 and by the *Business Information Group Terms of Reference* **(see under General Comments below)**. Mr Mustard leads ('sponsors') this Group. The Keeper agrees that Scottish Water have identified a suitable individual to this role as required by the Public Records (Scotland) Act 2011 (the Act).
2. Records Manager *Compulsory element*	**G**	**G**	Scottish Water have identified Ingrid Severn, Information Manager as the individual with day-to-day responsibility for implementing the Records Management Plan (the *Plan*) when agreed. This identification is confirmed by the *Information Manager Role in Information Management* document which has been provided to the Keeper. Ms Severn is the 'owner' of the *Plan*, the *Records Management Policy*, the

			Information Management Policy **(for both see element 3)**, the *Content Management Policy*, the *Records Retention Policy* **(see element 5)** and the *Information Quality Policy* (supplied to the Keeper – version 1.0 June 2016). The Information Manager is responsible for alerting staff to changes made to the *Plan* and any related policy. Ms Severn chairs the Scottish Water Business Information Group **(see under General Comments below)**. The Keeper agrees that Scottish Water have identified a suitable individual to this role as required by the Public Records (Scotland) Act 2011 (the Act).
3. Policy *Compulsory element*	**G**	**G**	Scottish Water have a *Records Management Policy* (the *Policy*) which has been provided to the Keeper (version 1.0 approved by the Business Information Group in June 2016) The Keeper agrees that the *Plan* supports the objectives of the *Records Management Policy*. Scottish Water also have an *Information Management Policy* which has also been provided to the Keeper (version 1.0 approved by the Business Information Group in June 2016) The Keeper agrees that the *Plan* supports the objectives of the *Information Management Policy*. Scottish Water have provided the Keeper with a screen-shot showing how their staff can access information governance policies on the Intranet 'Wavelength'.

			The Keeper agrees that Scottish Water has a records management policy statement as required by the Act.
4. Business Classification	**A**	**G**	There is a commitment in the Scottish Water *Information Management Policy* **(see element 3)** that they will achieve improved records management provision by "providing and continually improving a business classification scheme to enable best practice records management; facilitate information storage, retention and retrieval" (*Information Management Policy* page 5). This is supported by a general objective in the *Records Retention Policy*: "Scottish Water is committed to creating, keeping and managing records in a responsible and effective manner." To this end, Scottish Water is in the process of developing a business classification scheme for the organisation based on the UK Local Government Classification Scheme (adapted to include Scottish Water-specific record types). Initially this scheme will be to three levels function/activity/transaction. This must remain a business decision for Scottish Water. However, the Keeper acknowledges that this structure based on <u>function</u> is currently considered best practice. Many Scottish public authorities have opted for the SharePoint solution. The Keeper would remind Scottish Water that SharePoint is not in itself a records management system and for full functionality, particularly relating to e-mail functionality and for ensuring metadata travels with the record when extracted from the system – for the purposes of archiving for example **(see element 7)** – a records management bolt-on may be required. The *Business Classification Scheme* will be populated by local service areas. The Keeper welcomes the inclusion of local business units in the creation of a classification scheme as liable to produce a stronger business tool.

As a future development, the Plan states (page 8) that, once complete, the SW Business Classification Scheme will be merged with the SW Retention Schedule **(see element 5)** to provide a comprehensive Business Classification Scheme. The Keeper commends the principle of merging these two elements in a single document to create an 'Information Asset Register'-style business tool. It seems likely that information asset owners will also be identified in the business classification scheme/retention schedule document (*Records Management Policy* 1.b and 1.d etc.). The *Records Management Policy* sets out the "Attributes of Records to be Retained" in section 2. The inclusion of these areas in a business classification scheme would indeed be "comprehensive" and the Keeper commends this structure.

On page 8 of the *Plan* Scottish Water commits that: "Guidance on the Scheme for managing paper and electronic records will be produced and circulated prior to the Scheme being implemented corporately." **The Keeper requires that this guidance be provided to him when it becomes available.**

The Keeper acknowledges that the development of a corporate business classification scheme (or information asset register) will be incremental and, although he will require routine updates, he notes that it may not be fully operational in the authority for some time. This implementation project affects several other elements – such as 5 and 11).

The Keeper agrees this element of Scottish Water's records management plan on 'improvement model' terms. This means that he acknowledges that an authority has identified a gap in provision (in this case that there is no centralised business classification scheme). He also acknowledges that the authority has instigated procedures to close that gap. His agreement is conditional on his being updated as the *Business Classification Scheme* project progresses. Scottish Water have committed to do this.

| 5. Retention schedule | A | G | Scottish Water's *Information Management Policy* states (page 5) that records must be "preserved for an appropriate period of time."

To this end Scottish Water are developing a retention schedule based on the Scottish Council on Archives' SCAARS schedule. Retention decisions will be imposed on record types as part of the SharePoint implementation **(see element 4)**. This action is supported by the *Records Management Policy* **(see element 3)** which sets an objective (page 6) that Scottish Water should: "Incorporate a retention and disposal schedule to ensure records are managed and destroyed once they are no longer required."

The suggested retention decisions have been endorsed by the head of service of the relevant business area. The Keeper commends the use of local business units when developing a corporate records structure and retention schedule.

The Keeper has been provided with sight of the *Retention Schedule* as it currently stands and agrees that it seems appropriate for an authority of the size and complexity of Scottish Water. He acknowledges that this is not a final version including retention decisions for all records, paper and electronic, but thanks Scottish Water for sharing it with him.

A sample entry: Finance/Regulation & Strategy/Environmental Regulation/Special Waste Consignment Notes/3years/Environmental Protection (Duty of Care) Regulations 1992.

The Keeper has also been provided with Scottish Water's *Records Retention Policy* which lays out the principles to be adopted as the schedule is rolled out. This is version 1.0 'owned' by Ingrid Severn **(see element 2)**. This Policy confirms that the authority will "Establish and maintain a records retention and disposal scheme that |

			applies to all official business records, both paper and electronic." **As stated above, the Retention Schedule is not yet complete and operationally in use in Scottish Water. They commit in the *Action Plan*: "Scottish Water will develop and implement a corporate Records Retention Schedule…Training material and guidance notes on information will also be published". The Keeper agrees these actions.** **The Keeper agrees this element of Scottish Water's *Records Management Plan* on 'improvement model' terms. This means that Scottish water have correctly identified a gap in their records management provision and the Keeper acknowledges that they have put processes in place designed to close that gap. The Keeper's agreement is conditional on him being updated as the *Retention Schedule* is rolled out. Scottish Water have committed to do this.**
6. Destruction Arrangements *Compulsory element*	**A**	**G**	The *Records Management Policy* **(see element 3)** sets Scottish water the following objective: "Records shall be disposed after completion of the retention period. The disposal procedure shall ensure that the data on the records is fully erased and destroyed." The *Records Management Policy* also commits the authority to "Ensure a log of destroyed records and media is maintained." Sample destruction logs have been provided. The *Records Retention Policy* **(see element 5)** formalises the authority's acknowledgement of the principle that "Effective records management involves planning, organising and controlling the different stages in the life of a records…to its destruction…" The Keeper commends the above principles.

With the above objectives in mind, Scottish water have the following procedures in place to ensure the secure and irretrievable destruction of records when appropriate.

Paper (in-house): Scottish Water destroy hard-copy records in house following a formal process by which "authorised individuals" (*Records Retention Policy* page 4) approve and log the destruction of records. A sample *Work Instruction* has been provided to the Keeper in evidence that this process is operational.

Paper (external): Scottish Water have confirmed that they do not hold records with a third party storage supplier.

Electronic: **Once the ERM system is in place (see element 4) the authority intends to "automate retention and deletion arrangements in line with the SW Business Classification and Retention Schedule" (*Plan* page 10). The Keeper agrees this action.**

Back-ups: The business continuity back-up procedures in Scottish Water are explained in their *Information Backup and Restoration Policy* **(see element 10)**. The Keeper agrees that the authority has control of the retention period of back-up copies of records.

Hardware: "Scottish Water requires that all Media used for its business functioning shall be disposed of securely when no longer required". To this end Scottish Water have a *Secure Disposal of Electronic Media Policy* which has been provided to the Keeper. This is version 1.0 approved by the SW Information Security Group and published to staff on 1st February 2016. This sets out the procedure for the destruction of records from redundant media.

			Screen-shots have been supplied to demonstrate that staff have access to these policies on the 'Wavelength' intranet. **The Keeper is able to agree this element of Scottish Water's records management plan on improvement model terms. This means that the authority has identified a gap in their records management provision (centralised control of the destruction of electronic records is lacking), but have put processes in place to close that gap (the electronic records management system being rolled-out will automate the process). The Keeper's agreement is conditional on him being kept up-to-date with progress in the business classification/retention schedule implementation programme. Scottish Water have committed to do this.**
7. Archiving and Transfer *Compulsory element*	**A**	**G**	The *Records Retention Policy* **(see element 5)** formalises the authority's acknowledgement of the principle that "Effective records management involves planning, organising and controlling the different stages in the life of a records…to its destruction or permanent storage." The *Plan* refers to record 'transfer to The National Records of Scotland for preservation' (section 7 page 11). This is in line with an identification in the *Records Management Policy* **(see element 3)** that "Records identified as having permanent historical value will be offered to the National Archives [sic] of Scotland." (*Policy* page 6). The Keeper agrees that the National Records of Scotland (NRS) is a suitable repository for those records selected for permanent preservation. The development of discussions around identification of records and formalising transfer arrangements with NRS is an objective in the "Action Plan" section of element 7 in the *Plan*.

			The Keeper notes that Scottish Water are in the process of finalising a memorandum of understanding with the National Records of Scotland's Client Management Team.

The Keeper agrees this element of Scottish Water's records management plan under 'improvement model' terms. When the memorandum of understanding is agreed by both parties, a copy should be sent to the Public Records Act assessment team. |
| 8. Information Security *Compulsory element* | **G** | **G** | It is an objective of the *Information Management Policy* that "information should be securely protected from those who should not have access to it." (*Information Management Policy* page 5).

Scottish Water have an *IT Security Policy* which has been provided to the Keeper. This is version 1.5 approved by the SW Security Governance Group and reviewed in November 2014. The Keeper agrees that this policy properly considers the security of the authority's electronic records.

Scottish Water have a *Physical and Environmental Security Policy* which has been provided to the Keeper. This is version 1.2 approved by the SW Security Group in December 2013. The Keeper agrees that this policy properly considers the security of hard-copy records.

The arrangements explained in these policies are designed to comply with ISO27001.

A screen-shot has been supplied as evidence that staff have access to these policies through the intranet.

The *Physical and Environmental Security Policy* also includes physical access to IT |

			equipment and so supports the *IT Security Policy* and the *Computer Room Access Policy 2015* (not supplied). **The Keeper notes that Scottish Water are considering creating a *Data Loss Prevention Policy* in the future and requests that this is provided to keep the authority's submission up-to-date. Scottish Water have committed to do this.** **The Keeper agrees that Scottish Water have procedures in place that properly ensure the security of records as required by the Act.**
9. Data Protection	**G**	**G**	The *Information Management Policy* **(see element 3)** provides a commitment from Scottish Water of "keeping our employee and customer records confidential to the extent that the law permits". The *Records Management Policy* specifically mentions the Data Protection Act 1998 (page 5). To support this commitment, Scottish Water publishes a *Personal Data Policy* at http://www.scottishwater.co.uk/legal/personal-data-policy This includes information about subject access requests. Scottish Water also have a separate *Data Privacy Policy* which has been supplied to the Keeper. This is version 1.0 published 1st February 2016. This appears to be the staff guidance version of the statement online and has been put in place to "ensure control and protection of information classified as private, especially Personally Identifiable Information as per the applicable legislation." (*Data Privacy Policy* page 4). **A screen shot showing links from the authority's intranet has been provided.** The *Data Privacy Policy* explains the 8 (current) principles of the Data Protection Act 1998 and supports the online guidance around subject access requests.

			Scottish Water and its subsidiaries are registered with the Information Commissioner: **Z8725712** (Scottish Water) **Z3046142** (Scottish Water International) **Z1293817 (**Scottish Water Horizons Limited) **Z9448522** (Scottish Water Business Stream Limited) **Z2611215** (Scottish Water Solutions 2 Ltd) **The Keeper agrees that Scottish Water properly considers its responsibilities under the Data Protection Act 1998.**
10. Business Continuity and Vital Records	**G**	**G**	Scottish Water have provided an overarching *Business Continuity Policy Statement*. Scottish Water have a *Information Security in Business Continuity and Disaster Recovery* policy document which has been provided to the Keeper. This is version 1.0 approved by the SW Information Security Group and published 01 Feb 2016. The policy is directed at the recovery of information asset systems in the case of "adverse situations such as during a crisis or a disaster" (*Policy* page 4). The Keeper commends the creation of a specific information recovery policy. This policy supports the authority's general *Information Backup and Restoration Policy*. Which has also been supplied to the Keeper (version 1.0 – October 2016). The *Information Backup Policy* is designed to "address the requirement of suitable backup and restoration of business information, software and systems" (*IB Policy* page 4). This *Policy* explains the back-up cycle **(see element 6)**. Scottish water have established a Business Continuity Governance Group. **A screen shot showing links from the authorities intranet has been provided as evidence that staff can access these policies.**

			The Keeper agrees that Scottish Water have clear procedures for recovery of all records in the case of disaster. Furthermore, he acknowledges the consideration of 'vital' records as part of the Business Classification project (see element 4).
11. Audit trail	**A**	**G**	**See element 4 for improvement plans.** It is an objective of the *Records Management Policy* **(see element 3)** that "Records shall be managed to ensure that they are safe, available and retrievable." And that records are managed in an appropriate manner (for both see *Records Management Policy* page 5) and of the *Information Management Policy* **(also element 3)** "that information should be easily findable" (*Information Management Policy* page 5) and the *Information Quality Policy* (part of the definition of information quality): "information is available to the right people, in the right place, at the right time, in a usable format." The Keeper agrees that Scottish Water have correctly identified the importance of record tracking and identification. The *Plan* explains the file registry system used to track Scottish Water's paper records. However, Scottish Water state in their *Plan* (page 15): "The deployment of the new EDRMs (Electronic Documents and Records Management System) across Scottish Water will provide electronic audit trails as evidence of viewing, modifying and deletion of records." The Keeper agrees that the implementation of a electronic document management system such as SharePoint will greatly enhance the 'audit trail' functionality for electronic records.

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<td style="background-color:green"></td>
<td>Furthermore, the *Plan* explains: "Prior to the EDRMS rollout, SW will undertake a full inventory of all documents and files held in the electronic shared folders."

The Keeper agrees these action as an appropriate response to the above objectives.

Keeper can agree this element of Scottish Water's Records Management Plan under 'improvement model' terms. This means that he acknowledges that an authority has identified a gap in provision (in this case that records tacking is inhibited by the lack of a centralised business classification scheme). However, the Keeper acknowledges that the authority has instigated procedures to close that gap. His agreement is conditional on his being updated as the *Business Classification Scheme* project progresses. Scottish Water have committed to do this.</td>
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<td>12. Competency Framework for records management staff</td>
<td style="background-color:green">**G**</td>
<td style="background-color:green">**G**</td>
<td>Scottish Water have provided the *Information Manager Job Description* (version 1.0 June 2016). This clearly shows that Ms Severn is responsible for day-to-day records management in the authority and "coordination of the development, implementation and maintenance of information management practices, policies, standards, guidelines and procedures"

There is a commitment in Scottish Water's *Information Management Policy* **(see element 3)** that they will achieve improved records management provision by "providing guidance, training and support to encourage the adoption of good practice in information management." (*Information Management Policy* page 5). The Keeper commends this commitment.

To this end the management teams for each business function are responsible for providing information management training for their staff (*Information Management*</td>
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			Policy page 7) The *Plan* (page 7) commits Scottish Water to introduce the RMP to new staff as part of their induction, which already features information security and data protection training. The Keeper commends this. Records management training material will be produced as part of Scottish Water's "essential training cycles" (*Plan* page 7). **The Keeper would appreciate sight of this material when available. Scottish Water have committed to provide this.** The Keeper agrees that Scottish Water have ensured that the individual identified at element 2 has the required authority and skills to implement the *Plan*. They also consider training opportunities for this staff member and for other members of staff when appropriate.
13. Assessment and Review	**G**	**G**	It is a requirement of the Public Records (Scotland) Act 2011 that "An authority must— (a) keep its records management plan under review" (PRSA Part 1 5.1.a.). To comply with this, Scottish Water have arranged for their Internal Audit Unit to compile an <u>annual</u> review as instructed by the authority's Chief Information Officer **(see element 1)**. The review will be carried out, using "centralised monitoring audits" (*Plan* page 17) and in conjunction with the Information Manager **(see element 2)** who will in turn rely on input from Scottish Water's service areas. The Keeper commends the involvement of local business units in the review of records management implementation. The authority's Internal Audit Unit's interest in information management is emphasised in the *Information Quality Policy* (page 5) and the *Content Management Policy* (supplied to Keeper version 1.0 June 2016 page 6). This is supported by the *Information Manager Job Description*, which has been

supplied to the Keeper (version 1.0 June 2016). This document states that one of Ms. Severn's responsibilities is: "working with the CIO to plan and implement controls to monitor and effectively manage the organisation's information assets" **(see element 2)**.

The *Plan* (page 17) states: "Service level plans will be put in place for the continued development and improvement of records management practice in each service area." Again, the Keeper commends this approach.

The review process will feature in Scottish Water's business plan.

Scottish Water have provided the Keeper with the following detail:

"An audit of Records Management will be added to the SW audit plan and appropriate audit frequency established after a risk assessment has been undertaken.

The Information Manager will develop a compliance review process to be undertaken periodically (at least annually) to support our service areas in the development and improvement of records management practice across the business.

All information Management and Security Management Policies will be reviewed annually or upon significant change."

The Keeper agrees all these actions.

Keeper agrees that Scottish Water have made a firm commitment to review their RMP as required by the Act and have explained who will carry out this review and by what methodology. Furthermore, the Keeper agrees that Scottish Water have

			review dates set to ensure that associated policies and procedures are kept up to date and fit for purpose.
14. Shared Information			N/A

Version

This assessment is on the *Records Management Plan* of Scottish Water, version 1.2 approved by the Business Information Group **(see below)** in June 2016.

The authority refers to records as a business asset (for example *Plan* page 6 and 8 or *Information Management Policy* **see element 3** page 4). This is an important recognition and the Keeper commends it.

There appears to be a commitment to publish the *Plan* when agreed (*Plan* page 4) . **The Keeper strongly commends this and asks that he is informed when this has been done so that he may provide a link from his own site.**

The *Plan* mentions the Act and is based on the Keeper's, 14 element, Model Plan http://www.nrscotland.gov.uk/record-keeping/public-records-scotland-act-2011/resources/model-records-management-plan.

Third Parties

There is no indication that any function of Scottish Water is carried out by a third party under contract.

The Business Information Group

Scottish Water's Business Information Group is "sponsored" by the Chief Information Officer **(see element 1)** and is responsible for approving changes to information governance policies. The Information Officer **(see element 2)** chairs this group.

The *Terms of Reference* for this group have been provided to the Keeper and show that the group must "Endorse compliance with the Public Records (Scotland) Act 2011".

The Business Information Group, which meets every two months, approved the *Plan*, the *Information Management Policy* and the *Records Management Policy* **(for both policies see element 3)** as well as other relevant policies and guidance documents.

It is clear that this group has a fundamental role in the records management procedure in the authority and the Keeper thanks Scottish Water for detailing their role.
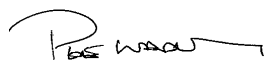
6. Keeper's Summary

Elements 1 - 13 that the Keeper considers should be in a public authority records management plan have been properly considered by Scottish Water (element 14 does not apply in this case). 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 **Scottish Water**.

- The Keeper recommends that Scottish Water 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 **Scottish Water** In agreeing this RMP, the Keeper expects Scottish Water 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