

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

**Board of Trustees of the Royal Botanic Garden, Edinburgh**

**Progress Update Review (PUR) Report by the PRSA Assessment Team**

**25<sup>th</sup> May 2021**

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## 1. Public Records (Scotland) Act 2011

The Public Records (Scotland) Act 2011 (the Act) received Royal Assent on 20 April 2011. It is the first new public records legislation in Scotland since 1937 and came 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 recordkeeping 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. Progress Update Review (PUR) Mechanism

Under section 5(1) & (2) of the Act the Keeper may only require a review of an authority's agreed RMP to be undertaken not earlier than five years after the date on which the authority's RMP was last agreed. Regardless of whether an authority has successfully achieved its goals identified in its RMP or continues to work towards them, the minimum period of five years before the Keeper can require a review of a RMP does not allow for continuous progress to be captured and recognised.

The success of the Act to date is attributable to a large degree to meaningful communication between the Keeper, the Assessment Team, and named public authorities. Consultation with Key Contacts has highlighted the desirability of a mechanism to facilitate regular, constructive dialogue between stakeholders and the Assessment Team. Many authorities have themselves recognised that such regular communication is necessary to keep their agreed plans up to date following inevitable organisational change. Following meetings between authorities and the Assessment Team, a reporting mechanism through which progress and local initiatives can be acknowledged and reviewed by the Assessment Team was proposed. Key Contacts have expressed the hope that through submission of regular updates, the momentum generated by the Act can continue to be sustained at all levels within authorities.

The PUR self-assessment review mechanism was developed in collaboration with stakeholders and was formally announced in the Keeper's Annual Report published on 12 August 2016. The completion of the PUR process enables authorities to be credited for the progress they are effecting and to receive constructive advice concerning on-going developments. Engaging with this mechanism will not only maintain the spirit of the Act by encouraging senior management to recognise the need for good records management practices, but will also help authorities comply with their statutory obligation under section 5(1)(a) of the Act to keep their RMP under review.

### 3. Executive Summary

This Report sets out the findings of the Public Records (Scotland) Act 2011 (the Act) Assessment Team's consideration of the Progress Update template submitted for the Board of Trustees of the Royal Botanic Garden, Edinburgh. The outcome of the assessment and relevant feedback can be found under sections 6 – 8.

### 4. Authority Background

The Royal Botanic Garden Edinburgh (RBGE) was founded in the 17th century as a physic garden. Now it extends over four Gardens boasting a rich living collection of plants, and is a world-renowned centre for plant science and education. Royal Botanic Garden Edinburgh is a Non Departmental Public Body sponsored and supported through Grant-in-Aid by the Scottish Government's Environment and Forestry Directorate. It is governed by a Board of Trustees appointed by Scottish Ministers. This Board is the scheduled authority under the Public Records (Scotland) Act 2011.

The organisation comprises over 240 staff drawn from a variety of disciplines, contributing in many different ways to its overall objectives and functions. The Garden is organised into five areas: Science, Horticulture & Learning, Enterprise & Communications, Resources & Planning and Development.

RBGE is a registered charity.

<http://www.rbge.org.uk/>

## 5. Assessment Process

A PUR submission is evaluated by the Act's Assessment Team. The self-assessment process invites authorities to complete a template and send it to the Assessment Team one year after the date of agreement of its RMP and every year thereafter. The self-assessment template highlights where an authority's plan achieved agreement on an improvement basis and invites updates under those 'Amber' elements. However, it also provides an opportunity for authorities not simply to report on progress against improvements, but to comment on any new initiatives, highlight innovations, or record changes to existing arrangements under those elements that had attracted an initial 'Green' score in their original RMP submission.

The assessment report considers statements made by an authority under the elements of its agreed Plan that included improvement models. It reflects any changes and/or progress made towards achieving full compliance in those areas where agreement under improvement was made in the Keeper's Assessment Report of their RMP. The PUR assessment report also considers statements of further progress made in elements already compliant under the Act.

Engagement with the PUR mechanism for assessment cannot alter the Keeper's Assessment Report of an authority's agreed RMP or any RAG assessment within it. Instead the PUR Final Report records the Assessment Team's evaluation of the submission and its opinion on the progress being made by the authority since agreeing its RMP. The team's assessment provides an informal indication of what marking an authority could expect should it submit a revised RMP to the Keeper under the Act, although such assessment is made without prejudice to the Keeper's right to adopt a different marking at that stage.

### Key:

G	The Assessment Team agrees this element of an authority's plan.		A	The Assessment Team agrees this element of an authority's progress update submission as an 'improvement model'. This means that they are convinced of the authority's commitment to closing a gap in provision. They will request that they are 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 Assessment Team may choose to notify the Keeper on this basis.
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**Progress Update Review (PUR) Template: The Board of Trustees of the Royal Botanic Garden Edinburgh (RBGE)**

Element	Status of elements under agreed Plan 08SEP14	Progress status 30JUL19	Progress status 25MAY21	Keeper's Report Comments on Authority's Plan 08SEP14	Self-assessment Update 19MAR19	Progress Review Comment 30JUL19	Self-assessment Update as submitted by the Authority since 30JUL19	Progress Review Comment 25MAY21
1. Senior Officer	G	G	G	Update required on any change.	Dr Alasdair Macnab left RBGE at the end of 2017. The Senior Officer is now Judy Cromarty, Head of Resources and Planning.	The Assessment Team thanks RBGE for this update which we have noted.	Judy Cromarty, Head of Resources and Planning, has overall strategic accountability for records management within the RBGE.  There are no planned future developments in respect of Element 1. However, if the senior level manager responsible for records management was to change, policies and procedures would need to be examined in the light of this change.  Update 24 May 2021: Joanne Hannah, Director of Resources and Planning, has replaced Judy Cromarty as the Senior Officer for RBGE.	The Assessment Team acknowledge and note that Joanne Hannah is now the named Senior Officer.  No immediate action required. Update required on any future change.
2. Records Manager	G	G	G	Update required on any change.	No change.  A Records Management Working Group, chaired by the Head of Resources and Planning, has been established and reports to the Senior Management Team meetings on a regular basis.	The establishment of a records management working group with access to senior management is to be commended. This should prove to be very useful going forward particularly when reviewing the implementation of the <i>Records Management Plan</i> .	Lorna Mitchell, Head of Library Services, has day-to-day operational responsibility for records management within the Garden.  There are no planned future developments in respect of Element 2.	No immediate action required. Update required on any future change.
3. Policy	G	G	G	Update required on any change.	No change	No immediate action required. Update required on any future change.	The RBGE Records Management Policy was updated in June 2019. The revised policy was approved by the Senior Management Team at the meeting held on the 24 <sup>th</sup> June 2019 and is now available to all staff via Green Pages (the Garden's intranet).  There are no planned future	In their original submission RBGE committed to keeping their information governance policies and guidance documents under review and the Assessment Team acknowledges that this is being done.

						developments in respect of Element 3.		
4. Business Classification	A	A	G	<p>RBGE have supplied a draft Business Classification Scheme (BCS) based upon a functional approach. The 'Action Plan' indicates a commitment to further populate and roll-out the BCS with a target date for completion of December 2014.</p> <p>The Keeper commends the functional approach of the draft BCS and use of the SCARRS system for constructing the scheme. The Keeper recognises this authority's commitment to closing a gap in its provisions and welcomes the RMP's statement of intent to update the Keeper as progress continues.</p> <p>The Keeper agrees this element of RBGE's RMP on 'improvement model' terms. This means that he is convinced of the authority's commitment to implement the BCS fully over time, but would request that he is updated as this project progresses.</p>	<p>In 2017 a pilot exercise was carried out in the Corporate Services division (HR, ICT, Estates Management and Finance) to look at the existing folder structure and map this to the BCS.</p> <p>The Department Heads were given an overview of the aims of the exercise and given time to familiarise themselves with the Records Management Plan. They were also tasked with gaining a clear understanding of the records that they held, where they were held and why. They were also advised to carry out a data cleansing exercise.</p> <p>Each Department also identified key staff to attend further workshops. These individuals knew the business area, had an awareness of previous records management activity and were familiar with the Division's strategic direction. They also had an understanding of how the Department's activities fit into the overall structure of the Division and the RBGE.</p> <p>Starting from the existing filing structures, the group of key staff mapped the folders across to the Functional levels of the RMP. The pilot was based around</p>	<p>The Assessment Team thanks RBGE for this update which we have noted.</p> <p>Although the target date originally submitted for this work was missed, the PUR demonstrates clear steps forward in what was always going to be an incremental process.</p> <p>It is important to test the new, more controlled, structure in a pilot and this has been done.</p> <p>It is important to involve the separate business areas in the development of the structure as it applies to them locally. This has been done.</p> <p>It is important to use any migration to a new system (even if still using shared drives) as an opportunity to clear out redundant or orphaned information in a data cleansing exercise. This has been factored in.</p> <p>It is important to recognise the importance of staff training even if the basic software is not changing. This has been factored in.</p> <p>In summary, the Assessment Team considers that the information supplied in this update suggests a fundamental improvement in the records management provision in RBGE is underway. We look</p>	<p>The RBGE has a BCS that aims to organise records according to business functions and activities rather than by their provenance or subject matter in order to provide a more stable method of classification and, where appropriate, to encourage the sharing of records across Divisions.</p> <p>The BCS is available to all staff via Green Pages (the Garden's intranet).</p> <p>There are no planned future developments in respect of Element 4.</p>	<p>Following the pilot project discussed at the last PUR RBGE now have an operational business classification scheme based on function rolled-out throughout the organisation and available to staff through the organisation's intranet.</p> <p>This must remain a business decision for the authority, but the Keeper would acknowledge that a functional scheme as developed by RBGE is currently considered best practice.</p> <p>The development and implementation of a Business Classification Scheme was a requirement of the Keeper's original agreement of 2014.</p> <p>The achievement of this objective marks a measurable improvement in the records management provision in the authority.</p> <p>If this was a formal re-submission it is likely that this element of the Plan would turn from Amber to Green.</p>

				<p>standard Microsoft architecture of mapped drives, folders and files. At the same time, where relevant, folders were re-named to accurately reflect their content and folders that contained the same type of information were merged. The structure that the group produced was then created on our shared network and with the support of ICT we established appropriate levels of permissions for each area.</p> <p>A number of key lessons came out of the pilot:</p> <ul style="list-style-type: none"> <li>- While time consuming, undertaking the review as a team provided considerable benefits in terms of identifying all of the relevant records and areas of overlap;</li> <li>- Staff required support in terms of documentation and training in order to successfully undertake the changes to their existing working practices;</li> <li>- Issues were found in identifying items for review and destruction, as file attribute dates were not always appropriate for record keeping purposes;</li> <li>- Support from ICT was essential, particularly in</li> </ul> <p>forward to further updates in subsequent PURs.</p> <p>The Assessment Team acknowledges the receipt of the RBGE Action Plan 2019 . This has been stored in order that the authority's submission might be kept up to date.</p>		
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				<p>relation to the effective management of permissions and linked files.</p> <p>Based on the findings of this project a revised process for the updating of the BCS is now under development. Further review of the lower levels of the ICT records structure is also taking place.</p> <p>In a recent data review it was confirmed that the core records relating to RBGE's Living Collection and Herbarium were securely stored in the existing collection management systems.</p>				
5. Retention Schedule	A	A	A	<p>RBGE have supplied a draft Retention Schedule covering the functions outlined in the BCS. There is a commitment as part of the 'Action Plan' to further populate and roll-out this scheme with a target date for completion of December 2014.</p> <p>The authority will identify vital records and add these to the retention schedule during the creation of the Business Continuity Plan.</p> <p>The Keeper recognises this authority's commitment to closing a gap in its provisions and welcomes the RMP's statement of intent to update the Keeper as progress continues.</p> <p>The Keeper agrees this element of RBGE's RMP on 'improvement model' terms. This means that he is convinced of the authority's</p>	<p>A pilot exercise was carried out in the Corporate Services division to test the draft RRS. As a result a revised process for the updating of the RRS, including the identification of vital records, is now under development. We can confirm that the Record Retention Schedule (RRS) will be the definitive document. Our intention is to ensure that the RRS and our Information Asset Register are linked in such a way that updating relevant information in the RRS will automatically update the IAR. In this way we will ensure consistency between the two documents and staff will only need to update</p>	<p>As with element 4 above, there is clear evidence of progress regarding the development of retention decisions around record types. Again the original target date was missed, but the Assessment Team are happy to acknowledge that movement is now evident in this 'action'. RBGE is subject to GDPR/DP2018 and as such they have created an Information Asset Register for record types containing personal information. The information asset register will be linked to the retention schedule. The Assessment Team has</p>	<p>The Garden has draft Record Retention Schedules (RRS) in place. The basic unit of record keeping is the electronic or paper document set, file or folder. These are hierarchical groupings bringing like information together related to a particular function, process or activity. Decisions about records will be made about the file rather than individual records within the set, files or folders wherever possible. It is acknowledged that some files will contain records with different retentions and service staff will advise on this.</p> <p>The RRS is available to all staff via Green Pages (the Garden's intranet).</p> <p>The draft RRS will be reviewed and updated in line with the revised BCS.</p>	<p>The next step in the improvement process underway at RBGE, following the implementation of a authority-wide Business Classification Scheme (see element 4), is allocating retention decisions to all the record types that appear in that scheme.</p> <p>The authority is some way down this route and has, in fact, created a draft version of a Records Retention Schedule.</p> <p>It is noted (under element 6) that specific staff guidance around retention and disposal is being pursued.</p> <p>This element remains at Amber while the schedule remains to be approved and rolled-out.</p> <p>The Assessment Team looks forward to updates in subsequent PURs.</p>

				commitment to implement the retention schedule fully over time, but would request that he is updated as this project progresses.	information in one place. Discussions with our ICT team are ongoing in order to identify how we achieve this.  As part of RBGE's preparation for the implementation of GDPR an Information Asset Register was developed. This included information on the retention period for each asset. This work will now be integrated with the revised RRS.	noted that work in this area is ongoing and they look forward to being kept updated on this work in subsequent PURs.		
6. Destruction Arrangements	G	G	G	The Keeper commands the provisions put in place by RBGE to properly destroy records in all formats. He would like to be kept up-to-date regarding both the planned review of the guidance for the management of electronic records and the authority's destruction procedures. He would also be interested in seeing the new staff training programme outlined under the Plan.	A copy of the staff training programme has been included with the Review documentation.	The Assessment Team thanks RBGE for this update which we have noted.  It is good to recognise the importance of staff training especially in a sensitive area such as the controlled, secure and irreversible destruction of public records. The Assessment Team acknowledge the receipt of the authority's Records Management Training Programme. This has been stored in order that the authority's submission might be kept up to date.	The RBGE RRS include information on the security classification and disposal action for records that are held by the Garden. Similar information was previously recorded in the RBGE Registered Files document. On the basis of this information records are securely disposed of via a service provided by Changeworks Recycling. Confidential waste is separated on-site and disposed of via Changeworks Recycling confidential waste service which provides Certificates of Destruction.  Data backed up in accordance with the ICT Data Backup and Retention Policy ("Protecting User Data") is overwritten or expired within a period of less than one year. Media, i.e. disks and tapes, removed from service is sent for destruction or is wiped using an accredited mechanism.  A Records Retention and Disposal Policy will be developed in order to provide staff with clear guidance on the disposal of public records. A review of the existing procedures for the disposal of records will be carried out. This will include input from the current contractor for the disposal of paper waste, Changeworks Recycling, in order to ensure that the new procedures can be fully implemented. The implementation of the Retention and Disposal Policy and related procedures will include a programme of staff training.	The Assessment Team thanks RBGE for this update on procedures which we have noted.  The Assessment Team also notes that RBGE are pursuing developments to ensure the record destruction processes map against the retention schedule disposition decisions (see element 5) as that schedule is firmed up.  The development of specific staff guidance on retention and disposal to coincide with the roll-out of the Retention Schedule is welcomed.
7. Archiving and	G	G	G	The Keeper agrees RBGE's arrangements for the	An ongoing project, led by the Head of	RBGE archives records selected for	The RBGE's public records that are identified as being of long term value are	RBGE transfers records selected for permanent preservation to its own in-

Transfer				archiving of its public records but would be interested in hearing news of the commitment in the RMP to develop a policy around the archiving of electronic records.	Resources and Planning, with support from the Head of ICT, is looking at potential systems to support the management of electronic records. This included a demonstration of the Laserfiche system in June 2018 and ongoing discussions with other Authorities regarding their local solutions.  The space that is available for the processing and storage of paper records will be reviewed as part of a wider space audit that is due for completion by the end of March 2019.	permanent preservation in its own in-house archive.  The Assessment Team notes the authority's comments regarding the permanent preservation of digital records. Digital archiving functionality is in very early stages in Scotland and the Assessment Team looks forward to updates in subsequent PURs.  The Assessment Team acknowledges the provision on the RBGE Action Plan which shows work on the hard-copy archive in 2019/20.	deposited in the RBGE Archive.  The RBGE RRS identify records that are considered as being of long term value. In addition, the Archive Collection Appraisal Policy, available to all staff via Green Pages (the Garden's intranet), includes criteria that can be used by staff to determine whether or not a record is likely to have long term value.  Policies and procedures covering the archiving of electronic records will be introduced. The Keeper will be kept informed of progress and changes to this element.	house archive.  Digital archiving is in its infancy in Scotland. It is welcomed that RBGE are already considering how this will best achieved in their own systems.  The Keeper would welcome updates on this issue going forward.
8. Information Security	G	G	G	Update required on any change.	No change.  RBGE has undertaken a detailed assessment of cyber security. An action plan has been developed and additional resources allocated to deliver to set deadlines.	The Assessment Team thanks RBGE for this update and notes that there is a review of information security planned. They look forward to further updates around this review in subsequent PURs.	The Garden's Senior Management Team is proactive in its approach to information security through the corporate risk register which is reviewed and updated six-monthly.  The Garden's RRS include a security classification, based on the classification issued by the Cabinet Office in April 2014, for each series of files. This enables the Garden to identify records that require a higher level of security and take appropriate actions to maintain this. The "Records Management: Security of Records" policy document, available to all staff via Green Pages (the Garden's intranet), outlines the Garden's approach to the security of print and electronic records and provides staff with information and guidance on the appropriate procedures.  The Garden has an Information and Communications Technology (ICT) Policy which include the objective to "ensure that all of the RBGE's computing and communication facilities, programs, data, network and equipment are adequately protected against loss, misuse or abuse". The Policy is available to all ICT users via	The Keeper agreed, in 2014, that the information security arrangements in the authority were appropriate. There is nothing in the detail provided here that would change that opinion.  This element remains Green.

						Green Pages. All ICT users (includes staff, students, associates, volunteers and long-term visitors) must sign a Declaration in order to signify their agreement to abide by the rules and regulations contained in the Policy before they are given access to the Garden's network and related facilities.  There are no planned future developments in respect of Element 8.		
9. Data Protection	<b>G</b>	<b>G</b>	<b>G</b>	Update required on any change.	No change.  RBGE reviewed data protection arrangements in preparation for the GDPR requirements of May 2018. An Information Asset Register (IAR), which included the designation of Information Asset Owners (IAOs) was developed in order to achieve substantial improvement in the way personal data (and other information) is managed across the organisation. This required broad management buy-in and a visible prioritisation of the tasks. Allocating clear senior management ownership for each information system or records series provided accountability for decisions and for improvement in meeting actions and tasks.  Given the breadth of senior managers' responsibilities, they couldn't be expected to have detailed knowledge of every information asset in their area of responsibility. They therefore had a choice to delegate the more detailed oversight by nominating	As with all other Scottish public authorities, RBGE have been required to review and update their data protection procedures in light of the 2018 legislation. The Assessment Team acknowledges that the public facing website has been updated to account for this:  <a href="https://www.rbge.org.uk/privacy-policy">https://www.rbge.org.uk/privacy-policy</a>  For <i>Information Asset Register</i> see element 5 above.  It is good to recognise the importance of staff training especially in a sensitive area such as data protection. The Assessment Team notes that resources have been expended by the authority to ensure their staff are adequately trained.  The Assessment Team notes that the GDPR requirements have prompted a review of records management provision generally and highlighted 'challenges'. This has been an unintended, but welcome, effect of	The Garden's Data Protection Policy is available on the public website along with the RBGE Publication Scheme which outlines the procedures for making subject access requests. The policy provides a statement of public responsibility and demonstrates the organisation's commitment to compliance with the Act and the safeguarding and fair processing of all personal data held. The Policy is also available to all staff via Green Pages (the Garden's intranet).  The Garden is registered on the Information Commissioner's list of Data Controllers (registration number Z5723674).  The Human Resources department acts as data protection coordinator for the Garden.  There are no planned future developments in respect of Element 9.	No immediate action required. Update required on any future change.

				<p>Information Asset Administrators from among their staff who would support IAOs in the day-to-day oversight of a particular information asset.</p> <p>Our IAO role is accountable to our Senior Information Risk Owner (the Head of Resources and Planning), who serves as the senior champion of information assurance and provides leadership and visibility to related governance measures within the RBGE.</p> <p>Training workshops given by a GDPR consultant were given to all our IAO's and IAA's at an early stage in this process as we regarded it as essential to support staff through the process. Further open sessions were also done at a later date.</p> <p>A number of challenges were identified:</p> <ul style="list-style-type: none"> <li>- Some legacy systems not having the functionality to support the deletion of records at the end of the defined retention period or on request;</li> <li>- Shared network drives were seldom actively managed to delete life-expired documents, records and data, resulting in personal and other data being retained indefinitely;</li> </ul>	<p>GDPR for many Scottish public authorities and the Team commend RBGE's candour in acknowledging their shortcomings here.</p> <p>Most of these should be addressed as part of the work described in elements 4 and 5 above. These remain at Amber until that work is completed. This element is specifically around compliance with data protection legislation and it is likely that, if this were a formal re-submission, the Keeper would consider RBGE still compliant (Green) on that issue.</p>		
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					<ul style="list-style-type: none"> <li>- Individual staff mail boxes were not time limited creating risk and significant costs in complying with FOI and subject access requests;</li> <li>- Manual records held beyond clearly identified retention</li> </ul> <p>To address these challenges Information Asset Owners have been tasked with ensuring that retention policies are applied to the systems and information assets within their area of responsibility, and to ensure retention periods are applied to paper files regularly and timeously. IAO's were also asked to assess the capability of their relevant systems to delete life-expired records and, where this is not available, to identify actions to close that functionality gap at the earliest reasonable opportunity.</p> <p>An action plan to monitor and improve data compliance is ongoing (a recent progress report is included for information).</p>			
10. Business Continuity and Vital Records	A	G	A	RBGE are currently in the process of creating a Business Continuity Plan. This Plan will identify vital records and provide information which will inform the retention schedule. The steps required to achieve this are clearly outlined in the Action Plan which	An ICT Business Continuity Plan was developed in association with the creation of a collections-focussed Major Incident Response Plan. These Plans will be updated to reflect the ongoing work on the Records	RBGE now have Business Continuity Plans for their digital and physical information assets.	Work to prepare business continuity and vital records plans for all areas of the Garden is ongoing. As part of the ongoing work, the Garden will identify the critical functions and key information required for the continuity of service delivery. Heads of Divisions will then be required to put in place arrangements to ensure that this	At the time of the last PUR (2019) the Assessment Team were under the impression that Business Continuity Plans including the recovery of records were available for all areas of the business. It seems from the current text that we were mistaken in that assumption and that this is still a work in progress.

				<p>accompanies the RMP. The RMP commits the authority to introducing staff training in this area and the Keeper would welcome updates on this.</p> <p>Improvement of the recovery of critical business systems is a target for the ICT work plan 2012-2016.</p> <p>The Keeper agrees this element of RBGE's RMP on 'improvement model' terms. This means that he is convinced of the authority's commitment to implement a Business Continuity Plan and to identify vital records over time, but would request that he is updated as this project progresses.</p>	<p>Retention Schedule. Training to support both of these documents is planned for the 2019/20 financial year.</p>	<p>supplied, it is likely that the Keeper could consider turning the RAG status of this element from Amber to Green.</p>	<p>information can be accessed during any disruptive incident. This information will be written up as the Garden's Business Continuity Plan and will be supported by a programme of compulsory training for all staff.</p> <p>The RBGE Record Retention Schedules will be updated to provide information on the vital records that are identified by staff during the production of the Business Continuity Plan.</p> <p>The Keeper will be kept informed of progress and changes to this element.</p>	<p>The actions explained in the text, such as the involvement in local business areas in the development of plans and the development of training is all commendable and will be welcomed by the Keeper.</p> <p>The Assessment Team notes the inclusion of 'vital records' in the development of the authority's retention schedule (see element 5) this is also commendable.</p> <p>This element is graded amber while this work is pursued. The Assessment Team looks forward to further updates in subsequent PURs.</p> <p><b>Please note, the change of RAG status of this element from green to amber does not reflect a reduction of records management provision in the authority, simply a misunderstanding, on the Assessment Teams' part, when considering the 2019 PUR.</b></p>
11. Audit Trail	A	A	A	<p>RBGE recognise that there is a serious gap in provision regarding the tracking of records and the RMP states that the Garden's Senior Management Team is committed to developing and implementing an audit trail by the end of the 2014-2015 financial year. The Keeper requests an update on this project.</p> <p>The Keeper agrees this element of RBGE's RMP on 'improvement model' terms. This means that he is convinced of the authority's commitment to implement an audit trail over time, but would request that he is updated as this project progresses.</p>	<p>The project to develop and implement an effective audit trail for records was delayed. The Head of Resources and Planning, with support from the RBGE Leadership team has committed to undertaking this work by the end of the 2019/20 financial year.</p>	<p>The Keeper's assessment Team notes that the target to develop an 'audit trail' (record tracking and version control) has slipped.</p> <p>However, the work around the <i>Business Classification Scheme</i> (see element 4) and potentially the <i>Information Asset Register</i> (see element 5) should help considerably.</p> <p>For the systematic tracking of records two of the actions described in this PUR under element 4 will be vital:</p>	<p>The Garden is currently unable to track and generate audit trails for either paper or electronic records. We are therefore not compliant with this Element at the present time.</p> <p>The Garden's Senior Management Team is committed to developing and implementing an audit trail for the records management system.</p> <p>A desk-based research exercise will be carried out in order to identify best practice within the sector for both print and electronic records. The research findings will be reviewed by the Records Management Working Group with a view to identifying the most appropriate system(s) for the Garden. The Group's recommendations will then be taken to the Senior Management Team for approval and implementation.</p> <p>The Garden's Internal Auditors will be asked to review the procedures that are</p>	<p>The Keeper's assessment Team notes that the target to develop an 'audit trail' (record tracking and version control) for all the authority's public records (in whatever format) has still not been achieved.</p> <p>This presents a risk to the authority. For example, responding to Freedom of Information deadlines requires efficient record tracking. The ability to find and identify records is also vital for the proper implementation of disposition. The new Retention Schedule will rely on this.</p> <p>That said, it is clear that this gap has been recognised by RBGE and a series of actions have been put in place to work towards the closing of that gap. It is particularly useful that the Garden's internal auditors will be utilised to test</p>

					<p><i>1. The pilot was based around standard Microsoft architecture of mapped drives, folders and files. At the same time, where relevant, folders were re-named to accurately reflect their content and folders that contained the same type of information were merged.</i></p> <p><i>2. Staff required support, in terms of documentation and training, in order to successfully undertake the changes to their existing working practices.</i></p> <p>While this work progresses this element of the RBGE Plan will remain at Amber.</p> <p>The Assessment Team looks forward to updates in subsequent PURs.</p>	<p>implemented at the end of the first year of operation.</p>	<p>the solution imposed.</p> <p><b>For the moment this element remains at Amber. However, RBGE should be aware that, if this were a formal resubmission, the Keeper will expect to see that the authority can provide evidence that the location of records is known and changes recorded. He may choose to return a plan if it is not apparent that an authority is able to provide such evidence.</b></p>	
12. Competency Framework	G	G	G	The authority is committed to a training programme and the introduction of a records management 'stream' within the main training portfolio by the end of 2015. The Keeper would like to see these training programmes when they become available.	Records management was added to the job description for all staff. In addition, in 2019/20 line managers have been asked to ensure that all staff have one objective for the year that directly relates to records management. A copy of the staff training programme has been included with the Review documentation.	<p>The Keeper would commend the inclusion of records management as a staff objective. At its most simple, standardised naming will greatly assist the authority's ability to locate records, which seems to be a weakness at the moment (see element 11).</p> <p>The Assessment Team acknowledge the receipt of the authority's Records Management Training Programme. This has been stored in order that the authority's submission might be</p>	<p>Core competencies, key knowledge and skills required by staff with responsibilities for RM have been clearly defined within the Garden's Records Management Competency Framework, ensuring that staff understand their roles and responsibilities and can offer expert advice and guidance.</p> <p>The Head of Library Services is a member of the Chartered Institute of Library and Information Professionals. The RBGE Archivist (Leonie Paterson) has a Postgraduate Diploma in Archives and Records Management.</p> <p>Records management has been added to the Job Description of all staff with responsibility for the management of records within the Garden.</p> <p>Records management has also been identified as a distinct stream within the</p>	<p>The Assessment Team thanks RBGE for this detailed update. The inclusion of records management in staff job descriptions is particularly welcome.</p> <p>See text under element 13 for staff guidance.</p> <p>The Assessment Team is confident that the Garden ensures that appropriate training is provided to staff as required.</p>

						kept up to date. Training in records management for all record creators is a positive step and to be applauded.	Garden's training portfolio, with initial training provided to all staff by the end of 2019.	
13. Assessment and Review	<b>G</b>	<b>G</b>	<b>G</b>	The Keeper welcomes RBGE's commitment to undertake self-assessments through the ARMS tool and regular, internal reviews and audits of the RMP and individual documents and policies including the Business Continuity Plan. The Keeper would like to receive updates on these reviews and requests that he be sent any updated policies such as a new Action Plan should these be amended following their review.	The RBGE Senior Management Team review all RBGE policies and related documents on a regular basis. Following on from the Regius Keeper identifying records management as a priority for the 2019/20 financial year a revised Action plan was developed and has been included with the review documentation.	In their original submission RBGE committed to updating relevant policy documents on a regular basis. The Assessment Team appreciates the confirmation that this is being done.  The completion of this Progress Update Review can also be considered as evidence of the commitment to review committed to in the original submission.  The Assessment Team acknowledges the provision on the RBGE Action Plan which shows work on reviewing records management provision in 2019/20.	Each of the policies, procedures and guidance have been produced to promote good records management practice across the Garden and to ensure a consistent approach to managing records. Guidelines and policies have involved consultation with relevant staff including ICT, Human Resources and users.  The guidance and information has been made available to all staff via Green Pages (the Garden's intranet).  The Records Management Plan and associated documents will be subject to ongoing review by the Records Management Working Group. In addition, Records Management has been integrated within the Garden's standard planning and reporting processes with a view to embedding it within the working practices of all staff. Finally, the Records Management Working Group provide an annual update to the RBGE Board of Trustees.	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.)  The Assessment Team thanks RBGE for the detailed update provided in the new version of the Records Management Plan, from which this PUR has been developed.  The completion of this Progress Update Review, and that in 2019, can also be considered as evidence of the review committed to in the original submission.
14. Shared Information	<b>A</b>	<b>N/A</b>	<b>N/A</b>	RBGE does not currently have an operational information sharing protocol but the need to close this gap in provisions is recognised by the authority and it is committed to creating a template information sharing protocol. The Action Plan sets a date for completion of January 2015. The Keeper requests sight of this template once created.  The Keeper would also like sight of the standard data access agreement template noted in the RMP.  The Keeper agrees this element of RBGE's RMP on	This element was subject to a detailed review at a recent Records Management Working Group meeting during which examples of current scenarios where information is shared (e.g. research projects, joint educational projects, etc) were discussed. As a result of that discussion we can now confirm that RBGE does not undertake routine information sharing with a third party and that the creation of a template	The Assessment Team notes that there was a commitment in the original submission to create an Information Sharing Protocol in 2015. At that time it was clearly thought that formal information sharing between RBGE and a third party or parties was being pursued.  This element is specifically aimed at information sharing as part of the routine business of the authority such as	Not applicable – see PUR feedback 2019.	No immediate action required. Update required on any future change.

			<p>'improvement model' terms. This means that he is convinced of the authority's commitment to implement a protocol for information sharing over time, but would request that he is updated as this project progresses.</p>	<p>Information Sharing Protocol is not required. Given that RBGE does a large amount of collaborative work the creation of a template Information Sharing Protocol was included in our records management plan as a "just in case" safeguard.</p> <p>Projects led by the Head of Resources and Planning in preparation for the implementation of GDPR and the potential impact of Brexit have identified all data that is held on behalf of other organisations by RBGE. A separate project, also led by the Head of Resources and Planning, is in progress to develop a Contracts Register.</p>	<p>Police Scotland traffic division regularly sharing information with Transport Scotland.</p> <p>It is not about occasional information sharing such as responding to subject access requests.</p> <p>Similarly, it does not necessarily apply that if you hold records on behalf of a third party you are undertaking 'information sharing' in the manner this element considers.</p> <p>Also if the contracts mentioned are for services, again this element may not apply.</p> <p>In the light of the explanation given by RGBE, the Assessment Team agree that RGBE do not share information in a way that requires an Information Sharing Protocol and agree that it is likely that if this were a statutory review this Element would be recorded as N/A.</p>		
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## 7. The Public Records (Scotland) Act Assessment Team's Summary

### Version

The progress update submission which has been assessed is the one received by the Assessment Team on 17<sup>th</sup> September 2020. The progress update was submitted by Lorna Mitchell, Head of Library Services.

The progress update submission makes it clear that it is a submission for the **Royal Botanic Garden Edinburgh**.

The Assessment Team has reviewed The Board of Trustees of the Royal Botanic Garden, Edinburgh's Progress Update submission and agrees that the proper record management arrangements outlined by the various elements in the authority's plan continue to be properly considered. The Assessment Team commends this authority's efforts to keep its Records Management Plan under review.

### General Comments

The Board of Trustees of the Royal Botanic Garden, Edinburgh continues to take their records management obligations seriously and is working to bring all elements into full compliance.

Section 5(2) of the Public Records (Scotland) Act 2011 provides the Keeper of the Records of Scotland (the Keeper) with authority to revisit an agreed plan only after five years has elapsed since the date of agreement. Section 5(6) allows authorities to revise their agreed plan at any time and resubmit this for the Keeper's agreement. The Act does not require authorities to provide regular updates against progress. The Keeper, however, encourages such updates.

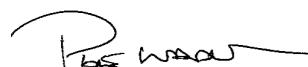
The Keeper cannot change the status of elements formally agreed under a voluntary submission, but he can use such submissions to indicate how he might now regard this status should the authority choose to resubmit its plan under section (5)(6) of the Act.

## 8. The Public Records (Scotland) Act Assessment Team's Evaluation

Based on the progress update assessment the Assessment Team considers that the Board of Trustees of the Royal Botanic Garden, Edinburgh continue to take their statutory obligations seriously and are working hard to bring all the elements of their records management arrangements into full compliance with the Act and fulfil the Keeper's expectations.

- The Assessment Team recommends authorities consider publishing PUR assessment reports on their websites as an example of continued good practice both within individual authorities and across the sector.

This report follows the Public Records (Scotland) Act Assessment Team's review carried out by,



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Pete Wadley  
Public Records Officer