OFFICE OF THE
SCOTTISH ROAD WORKS COMMISSIONER

RECORDS MANAGEMENT PLAN

Prepared in accordance with the Public Records (Scotland) Act 2011

Submitted to the Keeper of the Records of Scotland

Last reviewed 20 November 2024

Contents

Covering Statement

This Records Management Plan has been developed as required in terms of the Public Records (Scotland) Act 2011.

Having accurate and relevant information is vital to the efficient management of the Office of the Scottish Road Works Commissioner and records and information are valued as corporate assets. The organisation seeks to create and manage all records efficiently, protect and store them securely, make them accessible when needed and dispose of them safely at the appropriate time.

As an independent public official established under section 16 of the Transport (Scotland) Act 2005, I am accountable to Scottish Ministers and ultimately the Scottish Parliament. The office is located within Scottish Government buildings at Saughton House, Edinburgh. Scottish Government information management policies and procedures are generally adopted. As such, the office has adopted the Scottish Government electronic Record and Document Management (eRDM) system for our corporate records storage. All staff have been trained in the use of eRDM and are committed to using eRDM as it supports the aims of openness, transparency and information management principles. The adoption of eRDM ensures compliance in the creation, sharing, retention and retrieval of information. It also assists the organisation when meeting statutory obligations such as The Freedom of Scotland Act (FOISA) and the Data Protection Act (DPA). In addition to eRDM, my office has access to Scottish Government shared networks and One Drive.

Supporting procedures and guidance are provided to staff to encourage compliance. Processes and practices will be reviewed regularly to ensure that it continues to be relevant.

Records Management is a standing item on our monthly team meeting agenda and issues of relevance are discussed and recorded.

Kevin Hamilton
Scottish Road Works Commissioner
20 November 2024

SRWC Records Management

The Public Records (Scotland) Act 2011 requires the Commissioner to;

- Prepare a plan setting out proper arrangements for the management of their records.

- Submit that plan to the Keeper of the Records of Scotland for agreement.

- Ensure that their records are managed in accordance with the plan.

The Keeper has published a Model Records Management Plan to assist authorities when preparing their records management plans (RMP).

The Model Plan details 15 elements that the Keeper would expect a Scottish public authority to consider when creating its RMP. It is recognised that all elements of the Model Plan might not apply to every authority. The office of the Scottish Road Works Commissioner (OSRWC) has opted to address all 15 elements in its RMP.

The 15 Elements are:

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
15. Public Records created or held by 3rd Parties

The scope of the Model Plan applies to all records irrespective of the technology used to create and store them or the type of information they contain.

Please note that, in this document, the term 'Commissioner' refers to the Scottish Road Works Commissioner as an individual, whilst the 'oSRWC' refers to the organisation.

Element 1: Senior Management Responsibility

Requirement of Element	RMP Element Description
Requirement	A Mandatory element of the Public Records (Scotland) Act 2011. **An individual senior staff member is identified as holding corporate responsibility for records management.**
Statement of Compliance	The senior person who has overall strategic responsibility for records management is Kevin Hamilton, the Scottish Road Works Commissioner. Any change to the post-holder will not invalidate this plan as all records management responsibilities will be transferred to an incoming Commissioner and relevant training provided.
Evidence of Compliance	Evidence submitted in support of Element 1 comprises: • The Covering statement endorsed by Kevin Hamilton and forms part of this document. • SRWC Records Management Policy – E01
Action Required	No Further Action required.

Element 2: Records Manager Responsibility

Requirement of Element	RMP Element Description
Requirement	A Mandatory element of the Public Records (Scotland) Act 2011. **An individual staff member is identified as holding operational responsibility for records management and has appropriate corporate responsibility, access to resources and skills.**
Statement of Compliance	The manager who has day-to-day operational responsibility for records management is Debbie Young, Business and Governance Manager is a nominated Information Management Support Officer to the team. The Business and Governance Manager is also the Keeper's initial point of contact for the organisation. Any staff changes will not invalidate this plan as all records management responsibilities will be transferred to the incoming post-holder and relevant training provided.
Evidence of Compliance	Evidence submitted in support of Element 2 comprises: • SG Records Management Policy – E01 • Provision of Support from Corporate Records Manager – E01a • Business and Governance Manager Job Description – E03
Action Required	No Further Action required.

Element 3: Records management policy statement

Requirement of Element	RMP Element Description
Requirement	**The authority has an appropriate policy statement on records management.**
Statement of Compliance	The Commissioner recognises the value of records as a corporate asset and records management as a key corporate function. In view of the scale of the oSRWC, individual employees are largely responsible for the proper and effective management of the records they generate and receive. However, the Commissioner accepts strategic responsibility for these records and has allocated the operational role to the Business and Governance Manager. Given the importance of records for the day to day operations, and as a corporate memory of the office. The oSRWC is committed to ensuring that policies, procedures and practices are effective and reviewed regularly to ensure they continue to meet our needs and obligations.
Evidence of Compliance	Evidence Submitted in support of Element 3 comprises: • The Covering statement which forms part of this document and is endorsed by the Commissioner. • SRWC Records Management Policy – E01 • Standing Monthly Team Meeting Agenda – E04 • eRDM – Casework Folder Screenshot – E04a • Monthly Team Meeting Notes – E05

Requirement of Element	RMP Element Description
Action Required	No Further Action required.

Element 4: Business Classification

Requirement of Element	RMP Element Description
Requirement	**Records are known and are identified within a structure, ideally founded on function.**
Statement of Compliance	The Commissioner will comply with all relevant legislation and aims to achieve standards of best practice by adopting Scottish Government policies. The SRWC File Type Guidance – Retention Schedule aims to provide the framework for managing records and information. The scheme has four levels of classification, with the first three being subject based, the fourth describes the activity undertaken. Every file created has a specific retention and disposal attached to it.
Evidence of Compliance	Evidence Submitted in support of Element 4 comprises: • SRWC Records Management Policy – E01 • eRDM – Casework Folder Scrnshot – E04a • eRDM - Document Naming Convention – E04B • SG Business Classification Scheme – E06 • SRWC Retention Schedule – E07 • Recurrent Actions Sheet 2024 – E08
Action Required	No Further Action required.

Element 5: Retention Schedule

Requirement of Element	RMP Element Description
Requirement	A mandatory element of the Public Records (Scotland) Act 2011. **Records are retained and disposed of in accordance with the Retention Schedule**
Statement of Compliance	The Commissioner will comply with all relevant legislation and aims to achieve standards of best practice by adopting Scottish Government policies. The oSRWC utilises eRDM under the guidance of the SG Records Management Team. The retention periods are determined by statutory and legislative obligations, as well as business needs. The files created within eRDM have standard retention schedules that all SG and non-ministerial bodies use.
Evidence of Compliance	Evidence Submitted in support of Element 5 comprises: • SRWC Records Management Policy – E01 • SRWC Retention Schedule – E07 • The Covering statement endorsed by Kevin Hamilton • SG Policy on Managing Information held on Shared Drives – E34
Action Required	No Further action required.

Element 6: Destruction Arrangements

Requirement of Element	RMP Element Description
Requirement	A mandatory element of the Public Records (Scotland) Act 2011. **Records are destroyed in a timely and appropriate manner and records of their destruction are maintained.**
Statement of Compliance	All the oSRWC records are held electronically. Paper documents received by the oSRWC are scanned and filed in line with the Commissioner's File Plan. Electronic documents are deleted in line with the Retention Schedule and Records Management Policy. Non-confidential paper records received into the office are shredded. The Scottish Government arranges the secure disposal of the oSRWC's confidential paper records under its current contract with 'Shred-It'. The Commissioner implemented retention schedules for all electronic records and regularly reviews these. Records are destroyed on eRDM which is maintained by Scottish Government. The Commissioner's IT support is provided by Scottish Government who arrange for the secure disposal of electronic equipment.

Requirement of Element	RMP Element Description
Evidence of Compliance	Evidence Submitted in support of Element 6 comprises: • SRWC Records Management Policy – E01 • SRWC Retention Schedule – E07 • MOTO with SG – E09 • Signed MOTO Agreement 2010-2013 – E09A • Terms of Supply for the Provision of ICT Services – E10 • Certificate of Destruction – SH – C19399 – E11 • Destruction certificate from SHREDIT – E12 • SCOTS Back up and destruction procedures – E13 • Screenshot of destroyed file on eRDM – E14
Action Required	No Further action required.

Element 7: Archiving and Transfer arrangements

Requirement of Element	RMP Element Description
Requirement	A mandatory element of the Public Records (Scotland) Act 2011. **Records that have enduring value are permanently retained and made accessible in accordance with the Keeper's 'Supplementary Guidance on Proper Arrangements for Archiving Public Documents'.**
Statement of Compliance	The oSRWC will work with their nominated Client Manager at National Records Scotland to identify and select records of historical interest which show the significant functions of the office that will be transferred to the National Records of Scotland for permanent preservation. We have a formal Service Level Agreement between the oSRWC and the National Records of Scotland. eRDM is covered with the NRS selection policy which identifies the electronic records that NRS will be interested in for permanent preservation. The office of the Scottish Road Works Commissioner uses Scottish Government's Enterprise Vault to archive emails from all employees mailboxes.

Requirement of Element	RMP Element Description
Evidence of Compliance	- Evidence Submitted in support of Element 7 comprises: - SRWC Records Management Policy – E01 - Attendance at NRS Newcomers Surgery - E15 - SG Email Archiving - Enterprise Vault – E16 - NRS Depositor guidance for the transfer of archival born digital records – 2020 – E31 - NRS Email Deposit Agreement template and guidance – E31A - NRS Government Records Collection Policy – 2020 – E32 - NRS/SRWC Transfer Agreement – E32A
Action Required	No Further Action required:

Element 8: Information Security

Requirement of Element	RMP Element Description
Requirement	Records are held in accordance with information security compliance requirements.
Statement of Compliance	The Commissioner recognises that information is a valuable asset and has in place a high degree of security controls to ensure it is protected. To reduce the risk of sensitive information being compromised, a clear desk policy is operational and with increased periods of hybrid working, these procedures should be maintained which has been adopted from Scottish Government. The Commissioner utilises the secure SCOTS Connect service provided by the Scottish Government to host its network under an agreed Terms of Supply of ITech agreement. All employees have met the requirement for receiving a Disclosure Scotland Certificate and SG Baseline security verification has been confirmed prior to gaining access to assets. All employees are required to complete mandatory annual e-learning training regarding protecting information and data protection, to ensure there is an awareness of the importance of data security and associated risks.

Requirement of Element	RMP Element Description
Statement of Compliance (continued)	The oSRWC complies SG IT policy which covers; • Acceptable use of IT Systems • Using hardware safely • Working remotely • Using software safely • Protecting information The oSRWC achieved Cyber Essential plus in April 2023 accreditation to demonstrate its commitment to safely managing its electronic systems and information contained in them. There are few paper records generated and held by the oSRWC for a limited amount of time, including a paper copy of its Business Continuity Plan this is held in a secure locked file. The oSRWC operates a clear desk policy. Any paper records of a confidential nature or personal data are securely held.

Requirement of Element	RMP Element Description
Evidence of Compliance	Evidence Submitted in support of Element 8 comprises:
	• The Covering statement which forms part of this document and is endorsed by the Commissioner.
	• SRWC Records Management Policy – E01
	• Terms of Supply for the Provision of ICT Services – E10
	• Business Continuity Plan – E17
	• SRWC Code of Conduct – E18
	• Record of staff member mandatory e-learning – E19
	• Email circulated to team regarding mandatory e-learning – E20
	• Office of Security and Information Assurance (OSIA) – Clear desk policy– E21
	• Access to SCOTS when Working Remotely – E21A
	• SG Security Clearance letter – E22
	• SG eRDM Document Restrictions – E33
	• Scottish Government IT Security Policy – E35
	• Cyber Education Certificate of Attendance – E36
	• Cyber Resilience Notice: Issue 6 – E37
	• Cyber Essentials Certificate 2023 – E39
Action Required	No further action required.

Element 9: Data Protection

Requirement of Element	RMP Element Description
Requirement	**Records involving personal data are managed in compliance with data protection law.**
Statement of Compliance	The Commissioner and team members complies with its obligations under UK General Data Protection Regulations and the Data Protection Act 2018. The Commissioner has adopted the Scottish Government's Data Protection Policy and demonstrates commitment to this by ensuring employees complete mandatory e-learning training regarding protecting information and data protection. The Commissioner is a data controller registered with the Information Commissioner's Office (ICO) The Commissioner complies with obligations under the Freedom of Information (Scotland) Act 2002.
Evidence of Compliance	Evidence Submitted in support of Element 9 comprises: • SRWC Records Management Policy – E01 • Record of staff member record of mandatory e-learning – E19 • Email circulated to team regarding mandatory e-learning – E20 • ICO Renewal email – E23 • E-mail from SRWC naming Data Protection Officer – E23A • SG Data Protection Act Policy – ICO Issue – E24 • DPIA – Drive by site observation – E41

Requirement of Element	RMP Element Description
Action Required	No further action required

Element 10: Business Continuity and Vital Records

Requirement of Element	RMP Element Description
Requirement	**Record recovery, prioritising vital records, is an integral part of the authority's business continuity planning.**
Statement of Compliance	The Commissioner maintains a Business Continuity Plan to allow the organisation to recover in the event of loss of accommodation, data and/or staff. The Commissioner utilises the secure SCOTS Connect service provided by the Scottish Government to host its network under the agreed Terms of Supply of ITechs agreement. The Plan lists the Commissioner's vital records
Evidence of Compliance	Evidence submitted in support of Element 10 comprises: • Terms of Supply for the Provision of ICT Services – E10 • SCOTS Back up and destruction procedures – E13 • Business Continuity Plan – E17
Action Required	No Further action required.

Element 11: Audit Trail: Tracking and Version Control

Requirement of Element	RMP Element Description
Requirement	**The location of records is known and changes recorded.**
Statement of Compliance	The oSRWC is a small office with a relatively narrow remit, it complies with all relevant legislation and aims to achieve standards of best practice by generally adopting Scottish Government policies. The Commissioner operates the electronic Record and Document Management system (eRDM) which is maintained by the Scottish Government. This provides an electronic audit trail as evidence of viewing, modifying and deletion of records and the files that the records are contained in.
Evidence of Compliance	Evidence submitted in support of Element 11 comprises: • SRWC Records Management Policy – E01 • SG Audit Trail – E25
Action Required	No further action required.

Element 12: Records Management training for Staff

Requirement of Element	RMP Element Description
Requirement	**Staff creating, or otherwise processing records, are appropriately trained and supported.**
Statement of Compliance	The Commissioner's office is small consisting of 8 FTE. Due to this there is not a designated post for records management, although Records Management forms Business and Governance Manager's responsibilities. "Responsible for Information" and "Data Protection" are annual mandatory training for all staff, with additional training identified as part of the employee performance management system. eRDM training is mandatory for all staff before access can be permitted. The Business and Governance Manager is a member of the Scottish Information Commissioner's Part 7 Network Group. The Network group shares experiences and best practice about information management.
Evidence of Compliance	Evidence submitted in support of Element 12 comprises: • Business and Governance Manager's Job Description – E03 • Record of staff member mandatory e-learning completed – E19 • Email circulated to team regarding mandatory e-learning – E20 • Booking confirmation of staff member to attend eRDM and IMSO training – E26 • Email confirming team eRDM training – E27

Requirement of Element	RMP Element Description
Action Required	No Further action required.

Element 13: Assessment and Review

Requirement of Element	RMP Element Description
Requirement	A mandatory element of the Public Records (Scotland) Act 2011. **Records Management arrangements are regularly and systematically reviewed with actions taken when required.**
Statement of Compliance	The Commissioner will comply with all relevant legislation and aims to achieve standards of best practice by adopting Scottish Government policies where possible. The Commissioner's police's and procedures are reviewed regularly. A policy register is maintained to identify these documents and record review dates, along with a recurrent actions sheet to ensure deadlines are met. The Records Management Plan is a standing agenda item for monthly team meetings.
Evidence of Compliance	Evidence submitted in support of Element 13 comprises: • Standing Team Meeting Agenda – E04 • Team Minutes Notes – E05 • Recurrent Action Sheet – E08 • Policy and procedure update tracker – E40
Action Required	No further action required.

Element 14: Shared Information

Requirement of Element	RMP Element Description
Requirement	**Information sharing, both within the Authority and with other bodies or individuals, is necessary, lawful and controlled.**
Statement of Compliance	The Commissioner complies with the requirements of the UK General Data Protection Regulation and the Data Protection Act 1998.
	The Commissioner does not currently undertake data sharing exercises with other organisations. The Commissioner is familiar with the Information Commissioner's Data Sharing Code of Practice and would apply this in relevant circumstances.
	The Commissioner has adopted Scottish Government's GDPR and Data Protection Policy and IT Code of Conduct.
	In addition to undertaking "Responsible for Information" and "Data Protection" annual mandatory training, all team members are provided with training regarding protecting information in eRDM.
Evidence of Compliance	Evidence submitted in support of Element 14 comprises:
	• Scottish Government GDPR and Data Protection Policy – E24
	• IT Code of Conduct – E29
	• Protecting Information in eRDM – E30
Action Required	No further action required

Element 15: Public records created or held by third parties

Requirement of Element	RMP Element Description
Requirement	**Adequate arrangements must be in place for the management of records created and held by third parties who carry out any functions of the authority.**
Statement of Compliance	The Commissioner provides through a subscription service, the Scottish Road Works Register which is hosted by Symology UK Ltd. The register allows Roads Authorities and Statutory Undertakers to upload information relating to their road works noticing. This open data is then available to allow the SRWC to monitor each organisations, individual activities for compliance.
	The system also operates to allows the top level data to be imported for use on the Scottish Road Work Online website. This website provides for the travelling public, a geographical mapping system identifying restrictions and projects which are taking place on the Scottish Road Network
	The register is funded proportionally on use by those individual organisation. Symology currently supply the service which allows the Commissioner to fulfil his function
Evidence of Compliance	Evidence submitted in support of Element 15 comprises: • Symology - Abridged Statement of Requirements – E38
Action Required	No further action required

Appendix 1: Schedule of Evidence

Ref No	Title	Elements
E01	SRWC Records Management Policy	1 - 11
E01A	Provision of Support from Corporate Records Manager	2
E02	E-mail from SRWC naming responsible person	2
E03	Business and Governance Manager Job Description	2, 12
E04	Agenda for Monthly Team Meetings	3, 13
E04A	eRDM – Casework Folder Scrnshot	4, 13
E04B	eRDM - Document Naming	4
E05	Monthly Team Meetings Notes	3, 13
E06	Scottish Government Business Classification	4
E07	SRWC Retention Schedule	4, 5, 6
E08	Recurrent Action Sheet – August 2024	4, 13
E09	MOTO renewal Letter with Scottish government	6
E09A	Signed MOTO Agreement 2010-2013	6
E10	Terms of Supply for Provision of ICT Services	6, 8, 10
E11	Certificate of Destruction – Saughton House job C19399	6
E12	Shredit – Certificate of Destruction	6
E13	SCOTS back up and destruction procedure	6, 10
E14	Screenshot of destroyed file on eRDM	6

Ref No	Title	Elements
E15	Attendance at Newcomers Surgery – Tuesday 29 June 2021	7
E16	SG Email archiving – enterprise vault	7
E17	Business Continuity Plan	8, 10
E18	SRWC Code of Conduct	8
E19	Record of Staff member's Mandatory e-learning	8, 9, 12
E20	Email to team to complete mandatory e-learning	8, 9, 12
E21	Scottish Government Clear desk policy	8
E21A	Access to SCOTS when Working Remotely	8
E22	Scottish Government Security Clearance for new team member	8
E23	ICO Registration	9
E23A	Statement naming Data Protection Officer	9
E24	Scottish Government DPA Policy	9, 14
E25	SG Audit Trail	11
E26	Booking Confirmation to attend ERDM and IMSO training	12
E27	eRDM introduction for all SRWC team members e-mail	12
E28	Scottish Government Assessment and Review process	13
E29	Scottish Government IT Code of Conduct	14
E30	Protecting Information eRDM	14

Ref No	Title	Elements
E31	NRS Depositor guidance for the transfer of archival born digital records - 2020	7
E31A	Email – NRS Deposit Agreement template and guidance	7
E31B	NRS/SRWC Transfer Agreement	7
E32	NRS Government Records Collection Policy - 2020	7
E33	SG eRDM Document Restrictions	8
E34	SG Policy on Managing Information held on Shared Drives	5
E35	SG government IT Security Policy	8
E36	Cyber Education Certificate of Attendance	8
E37	Cyber Resilience Notice	8
E38	Symology – Abridged Statement of Requirements	15
E39	Cyber Essentials Certificate	8
E40	Policy and procedure update tracker	13
E41	DPIA – Drive by site observation	9