

Public Records (Scotland) Act 2011

Aberdeen City Licensing Board Assessment Report

The Keeper of the Records of Scotland

3rd February 2017

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1. Public Records (Scotland) Act 2011

The Public Records (Scotland) Act 2011 (the Act) received Royal assent on 20 April 2011. It is the first new public records legislation in Scotland since 1937 and came fully into force on 1 January 2013. Its primary aim is to promote efficient and accountable record keeping by named Scottish public authorities.

The Act has its origins in *The Historical Abuse Systemic Review: Residential Schools and Children's Homes in Scotland 1950-1995* (The Shaw Report) published in 2007. The Shaw Report recorded how its investigations were hampered by poor record keeping and found that thousands of records had been created, but were then lost due to an inadequate legislative framework and poor records management. Crucially, it demonstrated how former residents of children's homes were denied access to information about their formative years. The Shaw Report demonstrated that management of records in all formats (paper and electronic) is not just a bureaucratic process, but central to good governance and should not be ignored. A follow-up review of public records legislation by the Keeper of the Records of Scotland (the Keeper) found further evidence of poor records management across the public sector. This resulted in the passage of the Act by the Scottish Parliament in March 2011.

The Act requires a named authority to prepare and implement a records management plan (RMP) which must set out proper arrangements for the management of its records. A plan must clearly describe the way the authority cares for the records that it creates, in any format, whilst carrying out its business activities. The RMP must be agreed with the Keeper and regularly reviewed.

2. Executive Summary

This report sets out the findings of the Keeper's assessment of the RMP of **Aberdeen City Licensing Board** by the Public Records (Scotland) Act 2011 Assessment Team following its submission to the Keeper on **5th May 2016**.

The assessment considered whether the RMP of Aberdeen City Licensing Board 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 Aberdeen City Licensing Board complies with the Act can be found under section 7 of this report with relevant recommendations.

3. Authority Background

Licensing is the responsibility of licensing boards under powers contained in the Licensing (Scotland) Act 2005. Local licensing boards have wide discretion to determine appropriate licensing arrangements according to local needs and circumstances and their own legal advice. Each local government area must have a licensing board. Aberdeen City Licensing Board meets approximately every eight weeks on Tuesdays in the Town and County Hall, Town House, Union Street, Aberdeen. It has a membership of 9 councillors.

The Licensing Board is responsible for determining applications for liquor and gambling.

http://www.aberdeencity.gov.uk/law_licensing/licences/licensing/lic_LicensingBoard.asp

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 Aberdeen City Licensing Board's RMP was developed with proper regard to the elements of the Model Plan and is compliant with the Act. The assessment also considered whether there was sufficient supporting evidence of such compliance.

Key:

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

Aberdeen City Licensing Board

Element	Present	Evidence	Notes
1. Senior Officer <i>Compulsory element</i>	G	G	<p>Aberdeen City Licensing Board have identified, Fraser Bell, the Head of Service for Legal & Democratic and Clerk to the Board as the individual with overall responsibility for records management in the Licensing Board.</p> <p>Mr Bell has signed the <i>Records Management Plan</i>, endorsing it.</p> <p>The Keeper agrees that Aberdeen City Licensing Board have identified an appropriate individual to this role as required by the Act.</p>
2. Records Manager <i>Compulsory element</i>	G	G	<p>The Board have identified Caroline Anderson, Aberdeen City Council's Information Manager, as the individual with responsibility for implementing the submitted RMP.</p> <p>The Board have submitted Ms Anderson's job description which shows that she has a responsibility "To drive the improvement of information & records management systems and practice across the organisation. To ensure information & records management systems and practices comply with all relevant statutory requirements including the Public Records (Scotland) Act 2011"</p> <p>Ms. Anderson is the author of the <i>Plan</i>.</p> <p>She is also the author of the <i>Corporate Information Management Strategy</i>, the <i>ICT Acceptable Use Policy</i>, the <i>Information Lifecycle Management Policy</i>, the</p>

			<p><i>Information Security Policy (see element 8), the Business Classification Scheme Policy (see element 4), the Information Asset Register Policy and the Records Retention and Disposal Schedule (see element 5).</i></p> <p>The above shows that Ms Anderson has a detailed knowledge of the records management provision in the authority.</p> <p>Records management practices in the Council are directed by the Information Management Team led by the Information Manager (see element 2). The Information Management Team are information specialists in the Council (whose job descriptions have also been supplied).</p> <p>The Keeper agrees that the Board have identified a suitable individual to this element as required by the Act.</p>
<p>3. Policy Compulsory element</p>	<p>G</p>	<p>G</p>	<p>Aberdeen City Licensing Board operate the Council's <i>Information Lifecycle Management Policy</i> which has been provided to the Keeper (version 1.0 authorised by the Council's Finance, Policy & Resources Committee in September 2015).</p> <p>The <i>Lifecycle Management Policy</i> was created by Caroline Anderson (see element 2).</p> <p>Information & Records Lifecycle Management is one of the 7 key domains in the Council's Information Management strategy (see under General Comments below) which Aberdeen City Licensing Board also endorses.</p> <p>The <i>Lifecycle Management Policy</i> provides an explanation of the structure of the information management improvement programme (an action plan).</p> <p>Screen shots have been provided to show that staff have access to information</p>

			<p>governance documents through the Council's intranet 'The Zone'.</p> <p>The Keeper agrees that the <i>Plan</i> supports the objectives of the <i>Lifecycle Management Policy</i>.</p> <p>The Keeper agrees that Aberdeen City Licensing Board have a records management policy statement (in the form of their <i>Lifecycle Management Policy</i>) as required by the Act.</p>
<p>4. Business Classification</p>	<p>A</p>	<p>G</p>	<p>The Licensing Board features in Aberdeen City Council's <i>Business Classification Scheme</i>.</p> <p>However, The Council are clear in their RMP that this classification is still to be fully rolled out across the service areas of the authority (see <i>Improvement Programme under General Comments below</i>). The RMP states, under element 4: "The Information and Records Lifecycle Management project work will commence a programme of work to pilot, test and refine, and the implement the corporate Business Classification Scheme.."</p> <p>Technical & Physical Systems Management is one of the 7 key domains in the Council's Information Management Strategy (see under <i>General Comments below</i>).</p> <p>Samples from Corporate Governance have been provided to demonstrate how the <i>Scheme</i> will appear when rolled out.</p> <p>Below the level of corporate/business functions it is intended that the scheme will be populated by local service areas. The Keeper commends the involvement of local teams in this project as likely to create a stronger business tool.</p>

			<p>Aberdeen City Council holds records in paper and electronic format. It does not operate an EDRM.</p> <p>The <i>Scheme</i> is arranged in a functional system. This arrangement must remain a business decision for the Council, but the Keeper would like to acknowledge that a functional system is currently considered 'best practice'.</p> <p>The Council operates a hybrid system retaining both hard-copy and electronic documents as their corporate record.</p> <p>The Keeper agrees this element under Improvement Model terms. This means that he acknowledges that the authority have identified a gap in provision (the <i>Business Classification</i> is not fully functioning in the authority) and have committed to a plan to close that gap. This agreement is conditional on him being updated as the project progresses.</p>
5. Retention schedule	G	G	<p>The records created by Aberdeen City Licensing Board feature in Aberdeen City Council's <i>Retention Schedule</i>.</p> <p>This has been provided to the Keeper: <i>Corporate Policy Records Retention and Disposal Schedule</i> (version 2.0 September 2014, revised September 2015).</p> <p>The <i>Plan</i> states under element 5: "In 2015 the Council created a fully searchable version of its Records Retention & Disposal Schedule, hosted on our intranet..." Screen shots have been provided as evidence of this arrangement.</p> <p>The Keeper agrees that Aberdeen City Licensing Board has a schedule providing retention decisions for the record types created while pursuing their function.</p>

<p>6. Destruction Arrangements <i>Compulsory element</i></p>	<p>G</p>	<p>G</p>	<p>Aberdeen City Licensing Board utilise the destruction arrangements provided by Aberdeen City Council.</p> <p>The Council have provided the Keeper with an explanation of how they irretrievably and securely destroy:</p> <p>Paper: The Council have a contract with external document shredding organisation (Shred-It) and operate internal secure shredding using corporate confidential waste bins/sacks. The process of destruction and quality of shredding is explained in the RMP. A contract for this work has been provided as evidence.</p> <p>Electronic: The Keeper has been provided with guidance <i>Managing Information Corporate Procedures</i> which details the importance of managing the retention and disposal of electronic records and provides instruction to staff how this management should be implemented. The same document also explains The Council’s position on the management of e-mail.</p> <p>Hardware: The Council uses an external company (Computer Recycling Services) to recycle all hardware. A waste transfer receipt has been provided as evidence that these arrangements are in operation.</p> <p>Back-Ups: The Council backs-up its records for business continuity purposes. A schedule from the contractor carrying out this service (ATOS) has been provided as evidence. This makes clear that back-ups are retained for 3 months.</p> <p>Screen shots have been provided to show that staff have access to information governance documents through the Council’s intranet ‘The Zone’.</p> <p>Destruction arrangements for hard-copy records and for hardware are reiterated in the staff guidance document <i>Managing Information Corporate Procedures</i> which</p>
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			<p>has been supplied to the Keeper (version 1.0 July 2015).</p> <p>The Keeper agrees that Aberdeen City Council has processes in place to irretrievably destroy their records when appropriate.</p>
7. Archiving and Transfer <i>Compulsory element</i>	G	G	<p>Aberdeen City Licensing Board utilise the archiving arrangements provided by Aberdeen City Council.</p> <p>Aberdeen City Council transfer records to its own archive centre for permanent preservation. http://www.aberdeencity.gov.uk/education_learning/local_history/archives/loc_archiveshomepage.asp</p> <p>The Keeper has been provided with a link to the Corporate Archival Transfer and Acquisition Policy Council (dated December 2014) as evidence that proper arrangements are in place (http://committees.aberdeencity.gov.uk/documents/s42779/2014-11%20V0%201%20Archival%20Transfer%20and%20Aquisition%20Policy%203.pdf).</p> <p>Procedures for transferring records for permanent preservation feature in the staff guidance document <i>Managing Information Corporate Procedures</i> which has been supplied to the Keeper (version 1.0 July 2015).</p> <p>The Keeper agrees that Aberdeen City Council has proper arrangements in place for the archiving of its records as required by the Act.</p>
8. Information Security	G	G	<p>Aberdeen City Licensing Board utilise the information security arrangements provided by Aberdeen City Council. The Council have determined that “information</p>

<p><i>Compulsory element</i></p>			<p>security demonstrating adequate controls to prevent unauthorised access, deletion or alteration of records” is a key objective of the Information Management Strategy (see under General Comments below).</p> <p>Aberdeen City Council has a <i>Information Security Policy</i> which has been provided to the Keeper (version 1.0 dated September 2015).</p> <p>Screen shots have been provided to show that staff have access to information governance documents through the Council’s intranet ‘The Zone’. Specifically, a page of the Zone has been supplied showing staff access to the authority’s <i>ICT Security Advisory</i> leaflet. This shows staff are made aware of information security issues.</p> <p>The Information Security Policy is supported by a suite of security policies and guidance, such as the <i>ICT Acceptable Use Policy</i> and the <i>Corporate CCTV Procedure</i>. These documents have been provided to the Keeper. The Council has recently rolled-out a single mandatory induction and refresher module covering information security (see element 12).</p> <p>The Keeper agrees that Aberdeen City Licencing Board have procedures in place to appropriately ensure the security of their records as required by the Act.</p>
<p>9. Data Protection</p>	<p>G</p>	<p>G</p>	<p>Aberdeen City Licencing Board utilise the data protection arrangements provided by Aberdeen City Council.</p> <p>Aberdeen City Council have a <i>Data Protection Policy</i> which has been supplied to the Keeper (version 1.0 September 2015).</p> <p>The <i>Data Protection Policy</i> explains the (current) 8 principles of data protection.</p>

			<p>The Board is registered with the Information Commissioner: Z7016086</p> <p>A public acknowledgement of the Council's responsibilities under the Data Protection Act and subject access instructions are available at: http://www.aberdeencity.gov.uk/council_government/dp_foi/freedom_information/dp_a_explained.asp</p> <p>The Council has recently rolled-out a single mandatory induction and refresher module covering data protection (see element 12).</p> <p>The Keeper agrees that Aberdeen City Licensing Board have appropriately considered their responsibilities under the Data Protection Act 1998.</p>
<p>10. Business Continuity and Vital Records</p>	<p>A</p>	<p>G</p>	<p>Aberdeen City Licensing Board utilise the business continuity arrangements provided by Aberdeen City Council.</p> <p>The Council has a <i>Business Continuity Policy</i> which has been supplied to the Keeper. This is the version dated April 2014.</p> <p>Screen shots have been provided to show that staff have access to information governance documents through the Council's intranet 'The Zone'.</p> <p>Business Continuity & Disaster Planning is one of the 7 key domains in the Council's Information Management Strategy (see under General Comments below).</p> <p>The RMP states that the management of records under this policy may well change as 'The Council is currently conducting a test and review phase of work' The Keeper requests that he is kept abreast of any changes to this element that result from this review.</p>

			<p>Arrangements for the continuity back-up of records are explained in a schedule from the contractor carrying out this service (ATOS).</p> <p>The Council have provided a link to their <i>Corporate Policy - Information Asset Register</i> version 1 authored by Caroline Anderson in October 2014. This policy introduces the idea of using an information asset register to identify 'high risk Information Assets' to support business continuity and disaster recovery. This register will be created by local service area information asset administrators. The Keeper commends the local involvement in creating records management tools. It is thought that "high risk information assets" equate to the Keeper's "vital records".</p> <p>The Council identify 'Vital Records' as follows:</p> <p>"ACC holds certain records that are vital to its business continuity. This means that the service or team would be unable to undertake its core functions without access to these records. Records which are Vital Records must be identified as such on accession to either of ACC's Corporate Record Stores, to ensure that the Information Compliance Team have the appropriate level of security and access." (<i>Corporate Records Storage and Retrieval Service Practice and Procedures</i>). This statement, obviously, applies principally to hard-copy records.</p> <p>The Council states: "The Council's information asset register identifies the Council and the Licensing Boards business critical (vital) records."</p> <p>The Keeper can agree this element of Aberdeen City Licensing Board's plan under 'improvement model' terms. This means that he is convinced that, having identified a gap in provision (in this case the Business Continuity Policy is undergoing testing and vital records have not yet been identified</p>
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			<p>throughout) the authority has put measures in place to close that gap. His agreement is conditional on Aberdeen City Licensing Board providing him with evidence that vital records have been identified and noted and that testing of the Business Continuity Arrangements has been pursued.</p>
11. Audit trail	G	G	<p>Aberdeen City Licensing Board, adopting the information management objectives of the Council have as a key objective “that our information is accessible” (<i>Lifecycle Management Policy see element 3</i> page 2).</p> <p>The Keeper understands that many of the line-of-business systems used by the Aberdeen City Council and the Board, particularly around financial records, will impose suitable naming convention/version control at time of record-creation to adequately track records subsequently. Aberdeen City Licensing Board offer Carefirst and Lagan (and others) as examples of when this is likely to be the case.</p> <p>For documents created outwith these systems – on paper files or shared drives for example - the Council relies on the thorough implementation of staff procedures.</p> <p>The Council have provided the Keeper with their <i>Corporate Records Storage and Retrieval Service Practice and Procedures</i> document (version 3.0 July 2013). This document explains the processes by which hard-copy documents are moved amended around the Council.</p> <p>They have also provided the Keeper with their <i>Managing Information Corporate Procedures</i> document (version 1.0 July 2015). This document explains the purpose and procedure for naming conventions at the time of document creation. It also refers to line-of-business systems imposing structure on records (section 2).</p> <p>The Keeper agrees that a combination of the physical procedures explained in the</p>

			<p>former with the naming convention/version control instructions of the latter should provide the Board with the means to locate the correct record when required.</p> <p>Samples of the hard-copy document tracking logs have been provided.</p> <p>The Keeper agrees that Aberdeen City Licensing Board have procedures in place that should allow staff to locate records when required and to confirm the correct version.</p>
<p>12. Competency Framework for records management staff</p>	<p>G</p>	<p>G</p>	<p>Aberdeen City Licensing Board have provided the Keeper with the <i>Information Manager Job Description</i> this clearly shows that Ms Anderson (see element 2) has the appropriate responsibility for implementing the <i>Plan</i> once agreed.</p> <p>The Board have also provided the job descriptions for the Information Management Team who work with the Information Manager. The Keeper welcomes this supplemental evidence.</p> <p>The Information Management Team is responsible for:</p> <p>“Providing corporate support across the organisation on managing electronic and hard copy records and information, in accordance with business requirements and the Council’s responsibilities under the Public Records (Scotland) Act 2011. Providing a Records Storage and Retrieval Service from the on and offsite Corporate Records Stores.”</p> <p>Culture, Training & Communications is one of the 7 key domains in the Council’s Information Management strategy (see under General Comments below).</p> <p>The Keeper notes that the Improvement (action) Plan shown in element 3 of the</p>

			<p><i>Plan</i> has a objective to create ‘Competency framework for IM job roles’ and to arrange an ‘organisation wide training programme’. The Keeper requires that he is informed when this has been done.</p> <p>Screen shots have been provided to show that staff have access to information governance documents through the Council’s intranet ‘The Zone’. Specifically, a page of the Zone has been supplied showing staff access to the authority’s <i>ICT Security Advisory</i> leaflet. This shows staff are made aware of information security issues.</p> <p>Furthermore, staff are required to undertake mandatory information security training which is delivered through the online training facility ‘OIL’ (provided to the Keeper). The Council has recently rolled-out a single mandatory induction and refresher module covering information security, data protection, information management and FOI. The Keeper would appreciate sight of this training module.</p> <p>On this subject the <i>Plan</i> states under element 12 “In addition to the specialist roles outlined above, the Council recognises that information and records management is a core part of everyone’s job, and as such have a core mandatory programme in place for all staff...” The Keeper commends this recognition.</p> <p>The Keeper agrees that the individual identified at element 2 has the appropriate responsibilities, resources and skills to implement the records management plan. Furthermore, he agrees that the Board consider information governance training for staff as required.</p>
<p>13. Assessment and Review</p>	<p>G</p>	<p>G</p>	<p>The <i>Records Management Plan</i> was reviewed in June 2015 and progress on the action points of the <i>Information Management Strategy and Improvement Plan (see under general comments below)</i> will be reported on quarterly by the Council’s SIRO to the Corporate Management Team.</p>

			<p>Assessment will be carried out using the Council's information assurance assessment framework as explained in the <i>Information Management Strategy</i> (page 6).</p> <p>The Keeper also acknowledges that policies and procedures submitted in evidence have review dates included in their control sheets and commends this:</p> <p>The <i>Information Security Policy</i> (see element 8), the <i>ICT Acceptable Use Policy</i>, the <i>Information Asset Register Policy</i>, the <i>Records Retention and Disposal Schedule</i> (see element 5) and the <i>Information Lifecycle Management Policy</i> are all due for review by September 2016.</p> <p>The <i>Corporate Information Management Strategy</i> is due for review in 2019.</p> <p>The Board's registration with the Information Commissioner is due for renewal by August 2017.</p> <p>The Keeper agrees that the Board have processes in place to review their <i>Plan</i> as required by the Act and have determined a time when this will take place. The responsibility for undertaking the review and the review reporting procedure are also clearly laid out. Furthermore the Keeper acknowledges that appropriate review dates have been allocated to key evidential documents.</p>
14. Shared Information	G	G	<p>The Board have provided the Keeper with guidance of how Council staff create information sharing protocols when embarking on data sharing projects and have supplied a sample showing a data sharing agreement between the Council and the Police and NHS. The sample shows evidence of the consideration of records governance. The Licensing Board have agreed to follow Council procedures in this matter.</p>

			The Keeper can agree that Aberdeen City Licensing Board properly considers records governance when undertaking information sharing programmes.
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Aberdeen City Licensing Board

Version:

This assessment is on the joint Records Management Plan of Aberdeen City Council & Aberdeen City Licensing Board (April 2016, version 3.0) (the *Plan*). The Keeper agrees that it is appropriate for the Licensing Board to share a common plan with the Council.

The *Plan* is endorsed by the signatures of the Council's SIRO and by the Clerk to the Licensing Board (**see element 1**).

The authority refers to records as a business asset (for example *Lifecycle Management Policy* **see element 3** page 2). This is an important recognition and the Keeper commends it.

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>.

Corporate Information Management Strategy and Improvement Plan:

The *Plan* is a central pillar of Aberdeen City Council's *Corporate Information Management Strategy* which has been specifically endorsed by the Clerk to the Licensing Board and which has been provided to the Keeper (version 3 approved by the Council's Corporate Policy and Performance Committee in August 2010 and revised and approved by the Finance, Policy & Resources Committee in September 2014).

The *Corporate Information Management Strategy* was created by Caroline Anderson (**see element 2**).

The Strategy includes a framework of information management improvements which have been supplied to the Keeper and which feature in the *Plan* under **element 3**. Generally the ‘domains’ of the improvement programme match the Keeper’s 14 element Model Plan for example “Business Continuity and Disaster Recovery” . The improvement programme is timed to progress over 2014 -2019. **The Keeper requests updates when practical.**

A key area of improvement is the development of the Council’s *Business Classification Scheme/Retention Schedule/Information Asset Register* (there is an operational retention schedule already in place). This work is a feature of the Information & Records Lifecycle Management ‘domain’. A review of audit trail functionality will also be included (*Plan* element 11).

Under the ‘domain’ “Risk & Governance”, the targets have by and large been met by the creation of the *Records Management Plan*:

‘Senior Management responsibility’ – Element 1

‘Records Management responsibility’ – Element 2

‘Information Management Strategy’ – explained in Element 3

‘Audit Assessment and Review’ – explained in Element 12

‘Information Sharing Protocols’ – Protocol created; Register an objective going forward.

‘Records Management Policy’ – Now the *Information Lifecycle Management Policy*

The Keeper agrees that the *Plan* supports the objectives of the *Strategy*.

The Strategy also considers staff training. This is explained under element 12 of the *Plan*.

Records management practices in the Council are directed by the Information Management Team led by the Information Manager **(see element 2)**.

Third Parties :

The scope of the Act includes third parties carrying out the functions of public authorities. However, the Licensing Board states: “I can confirm that the Licensing Board do not contract out any of its functions”.

Information Asset Owners

Information Asset Owners and Information Asset Administrators have been identified in local service areas. The Keeper commends the involvement of local business areas in the implementation of the Council’s information management strategy and improvement plan.

Information Asset Owners work with information governance specialists to pursue the *Information Management Strategy (see above)*. Along with the Information Asset Administrators they have a responsibility for embedding good records management practice in their local areas. Again, the Keeper welcomes the involvement of local business areas when “integrating required improvements into individual Service Business Areas”.

Managing Information Corporate Procedures : Aberdeen City Licensing Board have provided the Keeper with an extremely useful staff guidance document *Managing Information Corporate Procedures* (July 2015 version). Many of the procedures referred to in the *Plan* are imposed on record creators through this document. For example it is directly relevant evidence for element 6, 7, 8 and 11.

6. Keeper's Summary

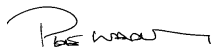
Elements 1 – 14 that the Keeper considers should be in a public authority records management plan have been properly considered by Aberdeen City Licensing Board. Policies and governance structures are in place to implement the actions required by the plan.

7. Keeper's Determination

Based on the assessment process detailed above, the Keeper **agrees** the RMP of **Aberdeen City Licensing Board**.

- The Keeper recommends that Aberdeen City Licensing Board 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,



.....
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 Aberdeen City Licensing Board. In agreeing this RMP, the Keeper expects Aberdeen City Licensing Board 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