

Public Records (Scotland) Act 2011

Grampian Valuation Joint Board Assessment Report

The Keeper of the Records of Scotland

29 November 2016

Contents

1. Public Records (Scotland) Act 2011 3
2. Executive Summary [3](#)
3. Authority Background [4](#)
4. Assessment Process [4](#)
5. Model Plan Elements: Checklist [5](#)
6. Keeper's Summary [19](#)
7. Keeper's Determination [19](#)
8. Keeper's Endorsement 20

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 Grampian Valuation Joint Board by the Public Records (Scotland) Act 2011 Assessment Team following its submission to the Keeper on 9 February 2016.

The assessment considered whether the RMP of Grampian Valuation Joint 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 Grampian Valuation Joint Board complies with the Act can be found under section 7 of this report with relevant recommendations.

3. Authority Background

The Grampian Valuation Joint Board was established as part of the 1996 re-organisation of local government in terms of The Valuation Joint Boards (Scotland) Order 1995 and is vested with the functions of the three valuation authorities (Aberdeen City Council, Aberdeenshire Council and Moray Council) in the area of the former Grampian Region. With the agreement of the three councils the Board also has responsibility for the Electoral Registration function. The Board comprises 15 members who are appointed by the three councils with the Aberdeen and Aberdeenshire councils each nominating 6 members and Moray Council 3 members.

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 Grampian Valuation Joint 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

Element	Present	Evidence	Notes
1. Senior Officer <i>Compulsory element</i>	G	G	<p>Grampian Valuation Joint Board (hereafter referred to as 'the Board' for ease of reference) has identified Ian H Milton, Assessor and Electoral Registration Officer (ERO), as having senior management responsibility for records management.</p> <p>This is confirmed in a joint statement from the Assessor and ERO and the Convenor of the Board, Councillor Ronald H Shepherd JP (evidence 4.1), which assigns this responsibility and also shows the Board's commitment to best practice records management.</p> <p>Also submitted is the Board's Document Retention Policy (evidence 4.2) which</p>

			<p>confirms the appointment of the Assessor and ERO as having senior management responsibility for records management. The Policy highlights the importance of records management in complying with the Freedom of Information (Scotland) Act 2002 and the Data Protection Act 1998. The Document Control sheet identifies this Policy as version 1.1 which was approved by the Management Team in August 2016.</p> <p>The Keeper agrees that an appropriate individual has been appointed to take senior management responsibility for records management as required by the Public Records (Scotland) Act 2011.</p>
<p>2. Records Manager <i>Compulsory element</i></p>	<p>G</p>	<p>G</p>	<p>The Records Management Plan (RMP) identifies Mark J Adam, Depute Assessor and ERO, as having operational responsibility for records management.</p> <p>The RMP lists as evidence of compliance with this element the Joint Statement by Convener of Grampian Valuation Joint Board and Grampian Assessor and ERO (evidence 4.1). This explicitly names Mr Adam as having operational responsibility for records management.</p> <p>The Document Retention Policy (evidence 4.2), submitted as evidence under this Element, identifies Mr Adam as having day-to-day responsibility for records management. The Document Control sheet identifies this Policy as version 1.1 which was approved by the Management Team in August 2016.</p> <p>Also submitted as evidence 4.3 is the Job Description of the Depute Assessor and ERO. This shows him as having operational responsibility for records management.</p> <p>The Keeper agrees that an appropriate individual has been identified to take operational day-to-day responsibility for records management as required by the Public Records (Scotland) Act 2011.</p>

<p>3. Policy <i>Compulsory element</i></p>	<p>G</p>	<p>G</p>	<p>The Board's Document Retention Policy (evidence 4.2) contains a statement of policy relating to records management which covers the importance of securely disposing of records, the management of electronic records and ensuring that records can be located when required. The RMP states that the Assessor and ERO (see Element 1) is responsible for records management within the Board. The Document Control sheet identifies this Policy as version 1.1 which was approved by the Management Team in August 2016.</p> <p>The RMP also states that this is an internal document and once revised and approved will be published on the Board's website. The Board has supplied a screenshot of its intranet, showing the location of the Document Retention Policy and other key information governance documents (evidence 4.33). A Minimum Standards Checklist for the induction of new members of staff has also been submitted (evidence 4.34). This includes making new staff aware of their responsibilities under the RMP as well as carrying out Data Protection training.</p> <p>The RMP itself also contains a statement outlining the importance of records management and describing the recordkeeping systems in place within the Board.</p> <p>Also submitted as evidence is an Appendix to the Document Retention Policy (evidence 4.4) which is the Board's Retention Schedule outlining the retention and disposal periods for each class of record created and managed by the Board.</p> <p>The Board has also submitted its Information Technology Security Policy (evidence 4.5) and Data Access and Building Security Policy which highlights its commitment to maintaining information security.</p> <p>The Keeper agrees that the Board has an approved operational policy statement and has provided evidence of how staff are able to access this so that they are aware of their records management responsibilities.</p>
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<p>4. Business Classification</p>	<p>G</p>	<p>G</p>	<p>The Board has submitted its Business Classification Scheme (BCS) (evidence 4.7). The BCS is a three level functional model which identifies the Board’s functions, the activities to carry out these functions and the record-creating transactions. The Keeper recognises that the use of the functional model is currently best practice as it is more resilient to organisational restructuring. The BCS is also based on the Board’s Retention Schedules which is maintained in order to comply with the Freedom of Information (Scotland) Act 2002.</p> <p>The Future Developments section of the Element states that the BCS and retention schedules are under constant review by the Board’s Management Team who are responsible for information governance, including compliance with Freedom of Information and Data Protection legislation.</p> <p>The Board has submitted an email from the Chief Executive’s office of Moray Council indicating that they provide the Board with Finance, HR and Payroll functions and hold records on behalf of the Board (evidence 4.35), and these records are managed according to the agreed RMP of The Moray Council.</p> <p>The Keeper agrees that the Board has a BCS which covers the breadth of the authority’s record creating activities.</p>
<p>5. Retention schedule</p>	<p>G</p>	<p>G</p>	<p>The Board has had a long-established retention schedule which was developed to allow the Board to comply with its obligations under the Freedom of Information (Scotland) Act 2002. The retention schedule is an Appendix to the Document Retention Policy and has been submitted as evidence 4.4.</p> <p>The retention schedule follows the three level structure of the BCS but also sets out the retention periods/triggers, disposal actions, format (electronic/paper), who is responsible for destruction and the level of security. This appears to be a comprehensive schedule which covers the breadth of activities carried out by the Board.</p>

			<p>The retention schedule is supported by the Document Retention Policy which details the procedures in place for the disposal of records based on the periods set out in the retention schedule.</p> <p>The RMP states that the retention schedule is continually monitored for accuracy and along with the Document Retention Policy is subject to a formal annual review.</p> <p>The Future Developments section of this Element states that the shared folder structure of the Board is currently being restructured and file naming conventions are also being established in order to assist with the consistent naming of files.</p> <p>The Keeper agrees that the Board has a retention schedule which details the disposal actions to be taken against the categories of records it creates and manages.</p>
<p>6. Destruction Arrangements <i>Compulsory element</i></p>	<p>G</p>	<p>G</p>	<p>The Board has described its destruction arrangements as follows:</p> <p>Paper – The Document Retention Policy (evidence 4.2) describes the organisational approach to the destruction of records. The RMP states that destruction takes place according to the timescales set out in the retention schedule. Records are either earmarked for permanent preservation, destruction or for further review. Prior to destruction checks will be made to ensure that records are not subject to any request. The RMP states that a record will be maintained of records which are destroyed.</p> <p>The Board has submitted its Confidential Waste and Disposal Procedures document (evidence 4.36). This was approved by the Management Team in August 2016. It explains the measures in place to ensure the secure destruction of confidential waste. Secure consoles are placed in strategic locations on the Board’s premises and will be collected regularly whereupon it will be securely destroyed by the third-</p>

			<p>party contractor. The document contains an appendix entitled 'Record of Destruction Checklist' which lists the steps to be taken when destroying records. The destruction of records is recorded using a Records Destruction Authorisation Form, which is also appended to the Procedures document.</p> <p>The Board has in place a contract with a commercial waste disposal provider (Shred-it) for the secure destruction of paper records. A certificate of destruction has been provided (evidence 4.9) showing that arrangements are operational.</p> <p><u>Electronic</u> – The Board has submitted its Confidential Waste and Disposal Procedures document (evidence 4.36). It explains the measures in place to ensure the secure destruction of confidential waste. The steps outlined in the Record of Destruction Checklist, which is appended to this document, can equally be applied to electronic records.</p> <p>A screenshot of the Windows folder permissions (evidence 4.40) used by the Board show that unauthorised or accidental deletion of files and folders is prevented by controlling staff permissions to access and amend records.</p> <p><u>Hardware</u> – The Board has submitted its Confidential Waste and Disposal Procedures document (evidence 4.36). It explains the measures in place to ensure the secure destruction of confidential waste and of obsolete hardware.</p> <p>As part of the contract to securely destroy paper records, Shred-it also securely destroys obsolete hardware. The sample destruction certificate (evidence 4.9) also evidences the secure destruction of hardware.</p> <p><u>Back-ups</u> – The destruction periods for the back-up tapes of are listed in the Board's retention schedule. Monthly back-ups are destroyed after 3 years, weekly back-ups are destroyed after 1 month and daily back-ups are disposed of on a</p>
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			<p>weekly basis.</p> <p>The Keeper agrees that there are provisions in place to allow the Board to securely destroy records which are no longer required for business purposes and have no long-term enduring value.</p>
<p>7. Archiving and Transfer <i>Compulsory element</i></p>	<p>A</p>	<p>A</p>	<p>The RMP states that printed electoral registers are sent to the library services of Aberdeen City, Aberdeenshire and Moray Councils. Evidence of this arrangement has been submitted in the form of a letter from the ERO to the librarian at Mintlaw (evidence 4.10). Electoral registers, Valuation Rolls and Council Tax lists for the above council areas that are no longer current are delivered to the archivist for Aberdeen and Aberdeenshire. Electronic versions are maintained by the Board in line with its retention schedule.</p> <p>The Board has submitted email correspondence with the Archivist at Aberdeen City and Aberdeenshire Archives (evidence 4.37) which shows an agreement in principle to accept the transfer of the Board’s corporate records, such as the minutes of Board meetings and other records identified as suitable for permanent preservation. This agreement in principle will be followed up a more formal Service Level Agreement. The Keeper requests that he is sent a copy of this agreement once finalised.</p> <p>The Keeper can agree this Element on an ‘improvement model’ basis. This means that the authority has identified a gap in provision (the lack of formal arrangements to transfer records identified for permanent preservation to a suitable archive) and has evidenced a commitment to closing the gap. This agreement is conditional on receiving the agreed finalised Service Level agreement six months from the date of agreement of this RMP. Should the Keeper not receive the Agreement within this timescale he may re-consider his agreement of this Element, and accordingly as archiving arrangements are specifically mentioned in the Public Records (Scotland) Act 2011, the RMP.</p>

<p>8. Information Security <i>Compulsory element</i></p>	<p>G</p>	<p>G</p>	<p>The Board has submitted its Information Technology Security Policy (evidence 4.5). This highlights the Board commitment to protecting its information systems and the information created and managed by these. It also outlines the responsibilities of staff in complying with the Policy. It sets out the procedures for maintaining security within the Board, including aspects such as the secure destruction of obsolete hardware, working off-site, use of passwords and Data Protection.</p> <p>The Board has also provided its Data Access and Building Security (evidence 4.6) covers the physical security of records and details the procedures in place for accessing buildings, clear desk policy and the protection of paper records.</p> <p>All staff are vetted by Disclosure Scotland. An invoice has been provided as evidence of this procedure (evidence 4.12). New employees are required to sign a letter undertaking to comply with the Board’s policies and procedures as part of the induction process. A sample letter has been provided as evidence 4.13 as well as a signed copy of the Internet Use Policy (evidence 4.14).</p> <p>The Board also has a suite of policies for ensuring information security, including a Clear Desk and Screen Policy (evidence 4.15), guidelines on compliance with the Data Protection Act (4.16), Acceptable Use Policy for IT systems (4.17) and Email Guidance (evidence 4.18).</p> <p>The RMP states that the above policies are available on the Board’s intranet. The Board has submitted a screenshot showing the location on its intranet of the abovementioned policies (evidence 4.44).</p> <p>Also provided are a screenshot of the Protecting Information – Level 1 online training module (evidence 4.1), a sample certificate of completion of the module and a log of staff having completed the training (evidence 4.42), an invoice showing that the Records Manager (see Element 2) has completed, or intends to complete, a</p>
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			<p>Foundation Certificate in Information Governance (evidence 4.43), a copy of a presentation on Security Classification (evidence 4.44) and a copy of a Records Management training presentation (evidence 4.45).</p> <p>The Keeper is able to agree that the Board has robust procedures in place to protect the information it creates and manages.</p>
9. Data Protection	G	G	<p>The Board has submitted its Data Protection Act 1998 Guidelines document (evidence 4.16) which describes its approach to dealing with the personal data it collects and manages whilst carrying out its functions and the responsibilities of staff in complying with the Board's obligations. Staff are required to sign an undertaking that they agree to comply with this document (see Element 8).</p> <p>The Assessor and ERO and the Board are registered as Data Controllers with the Information Commissioner's Office. A copy of the registration page has been submitted as evidence 4.19.</p> <p>The Board's website also contains a privacy statement which details its approach to the collection and use of personal data. The Keeper commends this external facing approach.</p> <p>The Keeper agrees that there are appropriate processes in place to protect the personal information collected and managed in the carrying out of the Board's functions.</p>
10. Business Continuity and Vital Records	G	G	<p>Section 7c of the Board's Information Technology Security Policy (evidence 4.5) states that back-ups of records and software are taken on a regular basis and stored at a remote location in the event of a disaster.</p> <p>The backing up of electronic information is a key part of the Board's accreditation as part of the Public Service Network (PSN). Rigorous annual testing of the Board's</p>

			<p>network and systems is carried out by an approved external body. The Board has submitted its certificate of PSN compliance (evidence 4.20).</p> <p>A copy of an IT Health Check and Vulnerability Assessment External Management Report has been submitted (evidence 4.21) showing that IT systems are actively tested.</p> <p>The Board takes a strategic approach to managing risk. Business continuity and the identification of information risks is built into the process of identifying potential risks. A copy of the Board's Risk Register and accompanying Report have been submitted as evidence 4.22.</p> <p>The Board has submitted its Contingencies Plan (evidence 4.23) which sets out its potential responses in the event of an interruption to its normal business activities. The current Plan, dated January 2010, is undergoing revision as a result of completing the PSN accreditation process. The Keeper requests he is sent the revised Contingencies Plan once it has been finalised in order to keep the Board's submission up-to-date.</p> <p>The RMP states that paper copies of the Board's vital records are held by Moray Council and are managed under the provisions set out in their agreed RMP. This is confirmed in a letter from Moray Council (evidence 4.35).</p> <p>The Keeper can agree that the Board has procedures in place to resume its operations in the event of an interruption to its normal business.</p>
11. Audit trail	A	A	<p>The Board uses three distinct methods of managing its electronic records: bespoke IT systems for carrying out its functions of Electoral Registration, Council Tax and creation of Valuation Rolls; shared drives; paper files.</p> <p>The RMP states that there is audit trail functionality in the software (Oracle) used by</p>

			<p>the Board for carrying out its 3 main functions. This can identify changes to records and the identity of those making the changes on the system. A screenshot has been supplied showing the audit trail functionality of Oracle (evidence 4.24).</p> <p>The Board also operates a file card sign-out system which records when a file was removed from storage and by whom providing a record of who has accessed a file over time. A copy of a sample file card has been supplied showing that the system is operational.</p> <p>The ‘Future Developments’ section of this Element states that work is currently underway to rationalise records held on shared drives. The Board has supplied evidence of how it currently imposes access controls to the records held and managed in shared drives (evidence 4.40). File versioning has also been implemented onto the Windows system on which the shared drive structure sits and a screenshot has been supplied showing this (evidence 4.39). Also submitted as evidence is a draft Document Naming Guidelines document (evidence 4.38) which shows that the Board is working towards putting measures in place to impose control on its shared drives.</p> <p>The updated RMP states that a Working Group has been established, chaired by the Depute Assessor for Aberdeenshire and consisting of representatives from the IT, Administration, Valuation and Technical sections, to update the file naming guidance for all electronic documents. A draft Document Naming Guidelines document (evidence 4.38) has been submitted showing that the Board is working towards putting measures in place to impose control on its shared drives. Rationalisation of shared IT folders and the use of SharePoint to enable more robust audit trail provision and a review of access rights is being considered by the Depute Assessor for Aberdeenshire and the IT manager.</p>
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			<p>The Keeper can agree this Element on an ‘improvement model’ basis. This means that the authority has identified a gap in provision (audit trail functionality on records held in shared drives) and has evidenced that it is considering options that will close the gap. As part of this agreement, the Keeper requests that he is kept informed as work on the project progresses.</p>
<p>12. Competency Framework for records management staff</p>	<p>A</p>	<p>G</p>	<p>The RMP states that the individual identified as having operational responsibility for records management, Mr Adam (see Element 2) is also the Data Custodian for the Scottish Assessors Association (SAA) and, as such, sits on the SAA Portal Management Committee and the SAA Governance Committee. The RMP also states ‘Annual objectives in relation to records management include the conclusion and submission of the plan to the Keeper of the Records of Scotland for agreement and implementation along with ongoing critical review during the course of the year by the Management Team and the formal annual review.’ The Board has submitted Mr Adam’s Job Description (evidence 4.3) which shows him as having operational responsibility for records management.</p> <p>The records manager has attended records management events organised by the National Records of Scotland (NRS) and is a member of the Information and Records Management Society. His membership certificate has been submitted as evidence 4.26.</p> <p>The RMP states that all staff must undergo online training in Data Protection and Information Security. Provided as evidence is a screenshot of the Protecting Information – Level 1 online training module (evidence 4.1), a sample certificate of completion of the module and a log of staff having completed the training (evidence 4.42), an invoice showing that the Records Manager (see Element 2) has completed, or intends to complete, a Foundation Certificate in Information Governance (evidence 4.43), a copy of a presentation on Security Classification (evidence 4.44) and a copy of a Records Management training presentation (evidence 4.45).</p>

			<p>The 'Future Developments' section of this Element describes that the Board intends to develop a competency framework for records management which will allow it to measure performance and identify training requirements.</p> <p>The Keeper can agree this Element on an 'improvement model' basis. This means that the authority has identified a gap in provision (lack of records management competency framework/objectives for relevant staff) and has committed to closing this gap. As part of this agreement, the Keeper requests that he is kept informed as work on the project progresses.</p>
<p>13. Assessment and Review</p>	<p>G</p>	<p>G</p>	<p>The RMP identifies the records manager as being responsible for formally reviewing the RMP on an annual basis. He is assisted in the assessment of the RMP and associated policies and procedures by the Management Team. Progress is reported to the Assessor and ERO who in turn reports to the Board. A sample Governance Report to the Board has been supplied as evidence 4.27. The RMP confirms that the Board will use ARMS to ensure compliance with its records management requirements. The Keeper recognises that this is an appropriate mechanism by which to measure the Board's compliance with its RMP.</p> <p>The RMP also states that an internal audit facility is available to the Board, provided by The Moray Council, to report on governance arrangements which includes records management. Submitted as evidence is an email from Moray Council's Internal Audit Manager (evidence 4.46) confirming the inclusion of records management in its work programme for 2016/17. The initial audit will be a high level review of the Elements of the RMP and in subsequent years selected Elements will be audited on a cyclical basis based on the level of risk identified with each Element. The Keeper commends the use of auditors in assessing records management provision within an authority.</p> <p>The Keeper agrees that the Board has measures in place to regularly assess and</p>

			<p>review the currency of its records management provisions.</p>
<p>14. Shared Information</p>	<p>G</p>	<p>G</p>	<p>The RMP states that the Board shares information with a third party in limited circumstances but when it does happen an appropriate agreement is entered into. Section 11c of the Board’s Information Technology Security Policy (evidence 4.5) covers its approach to Data Protection.</p> <p>Also submitted is a Minute of Agreement (evidence 4.29) between all Assessors and Valuation Joint Boards. The Agreement governs the development of a portal website to allow access to information relating to council tax banding, electoral registration and non-domestic rating. The Agreement commits each Assessor to complying with the Data Protection Act 1998.</p> <p>A Minute of Agreement between Scottish Electoral Registration Officers for sharing the data of 14 to 17 year olds (evidence 4.30) has been submitted. Section 7 of the Agreement relates to information governance.</p> <p>A template Minute of Agreement between Grampian ERO and third parties for the sharing of data in relation to electoral registration has been supplied as evidence 4.31. Section 7 of the Agreement relates to information governance.</p> <p>A sample Agreement has been supplied for the sharing of information in Valuation Rolls between the Assessor and Aberdeen City and Aberdeenshire Councils (evidence 4.32).</p> <p>The Keeper agrees that there are procedures in place to ensure that information can be shared with other bodies in a secure manner and with consideration given to information governance.</p>

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 Grampian Valuation Joint Board. Policies and governance structures are in place to implement the actions required by the plan.

Elements that require development by Grampian Valuation Joint Board are as follows:

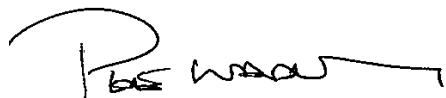
Element 7 - The Keeper can agree this Element on an 'improvement model' basis. This means that the authority has identified a gap in provision (the lack of formal arrangements to transfer records identified for permanent preservation to a suitable archive) and has evidenced a commitment to closing the gap. This agreement is conditional on receiving the agreed finalised Service Level agreement six months from the date of agreement of this RMP. Should the Keeper not receive the Agreement within this timescale he may re-consider his agreement of this Element, and accordingly as archiving arrangements are specifically mentioned in the Public Records (Scotland) Act 2011, the RMP.

7. Keeper's Determination

Based on the assessment process detailed above, the Keeper agrees the RMP of Grampian Valuation Joint Board.

The Keeper recommends that Grampian Valuation Joint 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,



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Pete Wadley
Public Records Officer

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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 Grampian Valuation Joint Board. In agreeing this RMP, the Keeper expects Grampian Valuation Joint 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