

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

### **Lanarkshire Valuation Joint Board Assessment Report**

**The Keeper of the Records of Scotland**

**9<sup>th</sup> August 2016**

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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 **Lanarkshire Valuation Joint Board** by the Public Records (Scotland) Act 2011 Assessment Team following its submission to the Keeper on **30<sup>th</sup> October 2015**.

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

## 3. Authority Background

The Lanarkshire Valuation Joint Board was established as part of the 1996 reorganisation of local government in terms of The Valuation Joint Boards (Scotland) Order 1995 and is vested with the functions of the valuation authorities of North and South Lanarkshire Councils. With the agreement of the two Councils, the Board also has responsibility for the Electoral Registration function for Lanarkshire. The Board comprises of 16 members who are appointed by the constituent Councils with each Council nominating 8 members. The present Board was appointed in June 2012 and elected as Convener Councillor John Cairney (South Lanarkshire).

<http://www.lanarkshire-vjb.gov.uk/lvjb/site/index.php>

## 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 Lanarkshire 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:

<b>G</b>	The Keeper agrees this element of an authority's plan.		<b>A</b>	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.		<b>R</b>	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

### Lanarkshire Valuation Joint Board (for simplicity this authority is referred to as ‘the Board’ in the assessment below)

Element	Present	Evidence	Notes
1. Senior Officer <i>Compulsory element</i>	<b>G</b>	<b>G</b>	<p>The Board have identified Gary Bennett, Assessor &amp; Electoral Registration Officer, as the individual with overall responsibility for records management in the authority.</p> <p>This is confirmed by the Records Management Policy section 8.2 (<b>see element 3</b>) and by a covering statement from Mr Bennett submitted with the <i>Plan</i>.</p> <p>The Assessor and Electoral Registration Officer is the organisation’s Data Controller (<b>see element 9</b>). He is responsible for implementing the <i>Data Protection Policy</i> across the organisation (<i>Data Protection Policy</i> section on Strategy).</p> <p>The Keeper agrees that Lanarkshire Valuation Joint Board have identified an appropriate individual in this role as required by the Public Records (Scotland) Act 2011 (the Act).</p>
2. Records Manager <i>Compulsory element</i>	<b>G</b>	<b>G</b>	<p>The Board have identified, David Combe, Assistant Assessor &amp; Electoral Registration Officer, as the individual with day-to-day responsibility for implementing the <i>Records Management Plan</i> (the <i>Plan</i>).</p> <p>The Board does not have a full-time dedicated records manager. The Keeper</p>

			<p>agrees that this is appropriate for a public body of the size and complexity of the Board.</p> <p>Mr Combe is the author of the <i>Plan</i>.</p> <p>The Board have submitted a signed commitment from the Assessor (<b>see element 1</b>) that resources and training will be provided to the 'Records Manager'. This statement supports the principles of items 8.5 and 8.6 of the <i>Records Management Policy</i> (<b>see element 3</b>). 8.2 of the <i>Policy</i> states that David Combe, Assistant Assessor &amp; ERO is LVJB's Record Manager and has operational responsibility for records management within the organisation.</p> <p>The Records Manager is responsible for ensuring the Board adheres to the requirements of the Act (<i>Plan</i> page 11). He is also responsible for assisting the Assessor (<b>see element 1</b>) and Management Team (see under General Comments below) in implementing the Plan, the <i>Records Management Policy</i> and the <i>Data Protection Policy</i> across the organisation (for example see <i>Data Protection Policy</i> section on 'Strategy').</p> <p>The Keeper agrees that Lanarkshire Valuation Joint Board have identified an appropriate individual in this role as required by the Act.</p>
<p>3. Policy Compulsory element</p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>The Board has a <i>Records Management Policy</i>, which has been submitted to the Keeper.</p> <p>This is version 1, approved by the Management Team in October 2004 and updated in light of PRSA in October 2015. It is published on the Board's website at: <a href="http://www.lanarkshire-vjb.gov.uk/lvjb/downloads/5/freedom_of_information">http://www.lanarkshire-vjb.gov.uk/lvjb/downloads/5/freedom_of_information</a></p> <p>The <i>Policy</i> contains a signed statement of commitment from the Assessor and</p>

			<p>Electoral Registration Officer (<b>see element 1</b>).</p> <p>The Keeper agrees that the <i>Plan</i> supports the objectives of the <i>Policy</i> (<b>However, see element 7 below</b>).</p> <p>The <i>Policy</i> explains the purpose of good records management, at section 2, 5 and 6, and mentions the Public Records Act and the Data Protection Act (<b>see element 9</b>).</p> <p>The Keeper agrees that Lanarkshire Valuation Joint Board have an approved and operational records management policy as required by the Act.</p>
<p>4. Business Classification</p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>The Assessor and Electoral Registration Officer has provided a statement committing the Board to ensuring that “all information received or created is stored in the appropriate way and is easily retrievable” (<i>Plan</i> page 4 and <i>Policy</i> page 1). The <i>Policy</i> also commits to “The development of a business classification scheme to reflect the functions, activities and transactions of LVJB.” (<i>Policy</i> section 7.1)</p> <p>To this end the Board operate a <i>Business Classification Scheme</i> which has been supplied to the Keeper (version: October 2015). This shows all the functions, activities and transactions of the Board. For example: Financial Management/Expenses/Travel &amp; Subsistence Claims.</p> <p>The Board operate a hybrid system with records held in both electronic and hard-copy format. There is a statement on page 11 of the <i>Plan</i> that paper records are currently being scanned into electronic systems. The Scanning Project covers all Domestic and Non-Domestic property records which were originally in a hard copy format.</p> <p>The <i>Business Classification Scheme</i> and the <i>Retention Schedule</i> are separate</p>



			<p>documents (<b>see element 5</b>).</p> <p>The Keeper agrees that Lanarkshire Valuation Joint Board has a business classification scheme that includes all the functions of the authority.</p>
5. Retention schedule	<b>G</b>	<b>G</b>	<p>Lanarkshire Valuation Joint Board has a <i>Retention Schedule</i> which has been provided to the Keeper. This is dated May 2012. It is available, published by function for example 'valuation' 'finance' etc., on the Boards public website at: <a href="http://www.lanarkshire-vjb.gov.uk/lvjb/downloads/5/freedom_of_information">http://www.lanarkshire-vjb.gov.uk/lvjb/downloads/5/freedom_of_information</a></p> <p>This <i>Schedule</i> supports a commitment from the Assessor and Electoral Registration Officer (<i>Plan</i> page 4 and <i>Policy</i> page 1) to ensure that all information is “retained, destroyed or preserved in accordance with the Board’s Retention and Disposal Arrangements.” The <i>Policy</i> also commits to “The review and consolidation of the retention and disposal schedule to provide clear guidance regarding the management of LVJB records” (<i>Policy</i> section 7.1).</p> <p>The <i>Records Management Policy</i> states: “All staff are responsible for suitably maintaining all records so that they can be easily retrieved, retaining all records in line with the retention and disposal schedule...” (<i>Policy</i> 8.4)</p> <p>The Keeper agrees that Lanarkshire Valuation Joint Board has an approved and operational retention schedule that covers the record types explained in their <i>Business Classification Scheme</i>.</p>
6. Destruction Arrangements <i>Compulsory element</i>	<b>G</b>	<b>G</b>	<p>The Board’s <i>Plan</i> features a commitment from the Assessor and Electoral Registration Officer (<i>Plan</i> page 4 and <i>Policy</i> page 1) to ensure that all information is “retained, destroyed or preserved in accordance with the Board’s Retention and Disposal Arrangements.”</p>

			<p>The Records Management Policy (see element 3) commits the Board to “The review and consolidation of destruction arrangements to detail the correct procedures to follow when disposing of business information”.</p> <p>The Board has the following procedures in place to securely destroy records when appropriate.</p> <p>Electronic: Electronic records are destroyed according to the principles laid down by their lead Council, South Lanarkshire. The basic procedure for purging records is explained in section 9 of South Lanarkshire’s <i>Confidential Waste Disposal Guidance Document</i> (version 0.2 August 2014) which has been supplied to the Keeper.</p> <p>Paper: Paper records are destroyed piecemeal using on-site shredders or, for bulk destruction, by utilising a third party (ShredIt). Details of the local shredding facilities and paperwork confirming the use of a third party contractor have been provided to the Keeper.</p> <p>Hardware: The Board have provided the Keeper with a detailed explanation of the irretrievable destruction of records held on redundant hardware (<i>Plan</i> page 7 and South Lanarkshire’s <i>Confidential Waste Disposal Guidance Document</i> section 8)</p> <p>Back-Ups: The Board, quite properly, take back-up copies of records for business continuity reasons. This is explained in their Plan page 10 “As part of the BCP [Business Continuity Plan] and risk assessment, there is a schedule of regular and systematic back-ups taken for vital IT records.” It is important that the Board can be confident that these records are deleted/overwritten routinely. As evidence, the Board have submitted an email dated 17 February 2016 from John Reilly, IT Business Systems Manager (Application Support and Development), South Lanarkshire Council confirming procedure in relation to back- ups.</p>
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			<p>The Keeper agrees that Lanarkshire Valuation Joint Board have procedures in place for the secure and irretrievable destruction of records when appropriate.</p>
<p>7. Archiving and Transfer <i>Compulsory element</i></p>	<p><b>A</b></p>	<p><b>G</b></p>	<p>The Act requires named public authorities, including the Board, to have proper arrangements for the transfer of selected material to an appropriate archive repository.</p> <p>The Board have considered this element. The <i>Records Management Policy (see element 3)</i> under section 7.1 “The production of archive transfer arrangements in order to provide advice and guidance on how to securely transfer records to the archive, if appropriate.” Section 8.1 refers to staff responsibility for “transfer to an archive for permanent preservation”. Section 2.2 refers to “any former records that may have been transferred to an archive”.</p> <p>The Retention Schedule (see element 3) identifies certain types of records under the retention decision ‘permanent’ (for example ‘VAC Hearing List’).</p> <p>The Board have submitted an e-mail from South Lanarkshire Council confirming that “LVJB reports and minutes...are all archived as permanent record...” and a copy of the Council’s formal retention schedule showing this.</p> <p>The Board have committed to pursuing a formal “archiving agreement in the form of a memorandum of understanding to ensure the transfer and preservation of any future records of enduring value.” The Keeper requires that this is forwarded to him when concluded.</p> <p>The Keeper agrees that Lanarkshire Valuation Joint Board has identified a suitable archive for the permanent preservation of historically significant records. <b>He agrees that transfer arrangements have been put in place under ‘improvement model’</b></p>

			<p>terms. This means that the authority has identified a gap in provision, in this case a lack of a formal archiving agreement, but the Keeper is satisfied that steps are being put in place to close that gap. The Keeper's agreement is conditional on a formal agreement being concluded between the Board and the Council and his receiving a copy of that agreement.</p>
<p>8. Information Security <i>Compulsory element</i></p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>The Board has adopted the information security procedures set out by their lead authority, South Lanarkshire Council. The Council's <i>Information Security Policy</i> has been provided to the Keeper along with a statement in the <i>Plan</i> (page 8) that the Board will adhere to this policy. The <i>SLA</i> between the Board and the Council has also been provided.</p> <p>The <i>Information Security Policy</i> submitted is version 6 approved by the Council's Executive Committee in 2014.</p> <p>The Council has based its <i>Information Security Policy</i> on ISO27001.</p> <p>The Board explains information security as follows: "Securing information assets, and in particular records, will help to fulfil legislative responsibilities, safeguard LVJB's reputation, ensure business continuity, optimise the management of risk and minimise the impact of security incidents."</p> <p>The adoption of this policy fulfils the Board's commitment in the <i>Records Management Policy (see element 3)</i> section 7.1 "consolidation of information security policies and procedures in order to protect records and systems from unauthorised access, use, disclosure, disruption, modification , or destruction".</p> <p>The Board's staff can access the <i>Information Security Policy</i> "by means of a personnel circular and on South Lanarkshire Council's intranet which the Board's staff have access to." Information security also forms part of the staff induction</p>

			<p>process.</p> <p>The Board have also provided the Keeper with a good description of the physical security present in their office space. Vital records are stored in a fire-proof safe (<i>Plan</i> page 11).</p> <p>The <i>Information Security Policy</i> is supported by a suite of guidance and ancillary policies such as the <i>ICT Acceptable Use Policy</i> and the <i>Clear Desk Procedure</i>.</p> <p>The Board have committed to “take appropriate... security measures to safeguard personal data.” (<i>Data Protection Policy</i> under ‘Controls’).</p> <p>The Keeper agrees that the Board have procedures in place that appropriately ensure information security in the authority.</p>
<p>9. Data Protection</p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>The submitted <i>Plan</i> specifically mentions compliance with the Data Protection Act 1998 (page 4).</p> <p>To this end, the Board has a <i>Data Protection Policy</i> which has been submitted to the Keeper.</p> <p>This is the version dated June 2010 (dated on the online version only) the submitted copy has no ‘control’ information..</p> <p>The <i>Data Protection Policy</i> is published at: <a href="http://www.lanarkshire-vjb.gov.uk/lvjb/downloads/download/1/lvjb_policies">http://www.lanarkshire-vjb.gov.uk/lvjb/downloads/download/1/lvjb_policies</a>          With an introduction at:  <a href="http://www.southlanarkshire.gov.uk/info/200176/sharing_information_with_you/302/data_protection">http://www.southlanarkshire.gov.uk/info/200176/sharing_information_with_you/302/data_protection</a></p>

			<p>The <i>DP Policy</i> lists the 8 data protection principles currently in use.</p> <p>The Board is registered with the Information Commissioner: Z4749745.</p> <p>The <i>Data Protection Policy</i> features subject access information. The Keeper agrees that the public have easy access to this. Specific guidance around removing personal information from the electoral register forms part of the <i>Data Protection Policy</i>.</p> <p>The Board's Data Protection Officer, Tracey Russell, is a certified data protection practitioner. The Keeper has been provided with a copy of her certificate. The Keeper thanks Ms Russell for sharing this with him. Ms Russell is responsible for giving training and advice on data protection issues (<i>Data Protection Policy</i> section on Controls).</p> <p>Specific training on data protection is provided to staff (<i>Plan</i> page 9).</p> <p>The <i>Records Management Policy</i> (<b>see element 3</b>) specifically refers to compliance with the Data Protection Act (section 2.4) and commits the Board to "The review and consolidation of data protection policies in order to demonstrate LVJB's commitment with the Act..."</p> <p>The Keeper agrees that Lanarkshire Valuation Joint Board have appropriately considered their responsibilities under the Data Protection Act 1998.</p>
<p>10. Business Continuity and Vital Records</p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>The Board has a <i>Business Continuity Plan</i> which has been provided to the Keeper. This is the version dated November 2014.</p> <p>The Keeper agrees that the <i>Business Continuity Plan</i> includes record recovery and</p>

			<p>the identification of vital records (sections 6 appendix 2 and 7). Vital records are described as: "information that is vital to maintenance of function" (<i>Business Continuity Plan</i> Appendix 2 section 4).</p> <p>The <i>Records Management Policy</i> (<b>see element 3</b>) commits the Board to "The continuing review of our business continuity arrangements, encompassing strategies to ensure that vital records held by LVJB remain accessible..."</p> <p>The Keeper agrees that the Board has business continuity arrangements in place that properly consider the recovery of records and, furthermore, that they identify vital records.</p>
11. Audit trail	<b>A</b>	<b>G</b>	<p>The Board's <i>Plan</i> features a commitment from the Assessor and Electoral Registration Officer (<i>Plan</i> page 4 and <i>Policy</i> page 1) to ensure that all information is "easily accessible to users and that the skills and technology are available to achieve this aim."</p> <p>However, the <i>Plan</i> states on page 11: "It is recognised that, at present, the Board does not have comprehensive procedures in place in relation to audit trails covering all transactions undertaken." This is not an unusual situation in a public authority, particularly one operating several different systems and that holds both electronic and hard copy records.</p> <p>The Board states under element 11 (<i>Plan</i> page 11) that "electronic systems within the authority are able to provide audit trails for electronic records" and, in the paragraph concerning paper records, "An audit trail is in place monitoring the movement and any changes to the content of the record".</p> <p><b>However, there is no audit trail in place to monitor the movement and changes to the content of Domestic and Non –Domestic paper property records. As</b></p>

			<p>the Scanning Project is in its final stages and all property records will shortly be in an electronic format it was considered this is not necessary.</p> <p>The Keeper agrees this element of Lanarkshire Valuation Joint Board’s <i>Plan</i> under improvement model terms. This means that the authority has identified a gap in provision (paper property records are not sufficiently tracked) and the Keeper acknowledges that the authority has procedures in place to close that gap. His agreement is conditional on his being updated as the scanning project progresses.</p>
<p>12. Competency Framework for records management staff</p>	<p><b>A</b></p>	<p><b>G</b></p>	<p>The Board does not have a full-time dedicated records manager. The Keeper agrees that this is appropriate for a public body of the size and complexity of the Board.</p> <p>The <i>Records Management Policy (see element 3)</i> states at 8.5 “...the records manager of LVJB requires the core competencies and key knowledge and skills to enable him to operate an efficient records management system.” This objective is supported by <i>Policy</i> section 9.1. The Keeper agrees this objective.</p> <p>However, the Board states: “LVJB acknowledges that the nominated records manager lacks a number of the core competencies required to carry out his roles and responsibilities”.</p> <p>The Board have provided a statement signed by the Assessor (<b>see element 1</b>) committing the Board to providing the Records Manager with the required training as part of a personal development programme. This is supported by <i>Policy</i> section 9.2.</p> <p>The <i>Records Management Policy</i> commits the Board to “The identification of records management as a distinct stream within the Board’s training aims...”</p>



			<p>Information security forms part of the staff induction process and going forward “at intervals” (<i>Plan</i> page 9). The Keeper asks to be provided with sight of the Board’s induction procedures.</p> <p>Data protection training is provided to staff (<i>Plan</i> page 9). Training materials have been shared with the Keeper.</p> <p>The <i>Plan</i> (page 12) sets an objective for the records manager to identify and procure information governance training for appropriate staff.</p> <p><b>The Keeper agrees this element of the Board’s <i>Plan</i> on ‘improvement model’ terms. This means that the authority has correctly identified a gap in provision (the records manager has specific records management training needs) and has committed to closing that gap. This agreement is conditional on him being kept appraised on progress in this area. The Keeper agrees that the Board considers information governance training for appropriate staff.</b></p>
<p>13. Assessment and Review</p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>The Act requires a scheduled public authority to “keep its records management plan under review” (part 1 5.1 (a)).</p> <p>The Assessor and Electoral Registration Officer (<b>see element 1</b>) declares in a signed statement (<i>Policy – see element 3</i>, page 1) “It is our aim to draft and implement an effective Records Management Plan in order to meet the requirements of the Act. The Plan will be reviewed at regular intervals to ensure its effectiveness”. The <i>Policy</i> also commits the Board to “The completion of a self assessment review, following the implementation of the records management plan...” (section 7.1 of the <i>Policy</i>).</p> <p>The Board have set a review date of October 2016. This review is the responsibility</p>

			<p>of the Management Team (<b>see under General Comments below</b>).</p> <p>The first review date is confirmed in the introduction to the <i>Plan</i> (page 1, 2 and 4) and by a <i>Covering Letter</i> from the Assessor and Electoral Registration Officer submitted with the <i>Plan</i>.</p> <p>The <i>Plan</i> (page 13) features a table showing the governance structure responsible. This shows that the Management Team reports to the Senior Management team. Governance is a standing agenda item on Senior Management and Management Team meetings. (Policies are then approved by the Board itself.). A sample agenda has been provided in evidence for this element.</p> <p>The <i>Plan</i> state that the Board's <i>Retention Schedules</i> are reviewed on a regular basis by the Management Team.</p> <p>The Board's data protection registration should be renewed by April 2016.</p> <p>A review of the <i>Records Management Policy</i> is due by October 2016 and every two years thereafter. The Keeper welcomes this commitment.</p> <p>The Keeper agrees that Lanarkshire Valuation Joint Board have processes in place to review their <i>Plan</i> as required by the Act.</p>
14. Shared Information	<b>G</b>	<b>G</b>	<p>Lanarkshire Valuation Joint Board operate information sharing in "limited circumstances" (<i>Plan</i> page 20). Although not specifically stated, the Keeper understands this to refer to sharing with the two local authorities that constitute the area of responsibility of the joint board and with central government.</p> <p>When undertaken, these sharing programmes are supported by formal agreements.</p>

			<p>The Board has supplied the Keeper with examples of data sharing agreements. The Keeper agrees that these consider information governance. For example the agreement between the Board and HMRC features records at 2.6 and 3.</p> <p>The Keeper agrees that the Board formally consider records governance as part of the arrangements entered into before undertaking information sharing programmes.</p>
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**Lanarkshire Valuation Joint Board**  
**(for simplicity this authority is referred to as ‘the Board’ in the assessment below)**

General Notes on RMP, Including Concerns:

Version

This assessment was carried out on the Records Management Plan of Lanarkshire Valuation Joint Board version 1.1.

This version was approved by the Management Team (**see below**) in October 2015. It was created by David Combe, Assistant Assessor & Electoral Registration Officer (**see element 2**). It will be reviewed by the Management Team, by October 2016 (**see element 13**).

The Board recognises records as a corporate asset (for example: *Plan* pages 4, 5, 9. The introduction 1.2 and 6.1 of the *Policy* (**see element 3**). The Keeper welcomes this recognition.

The introduction to the Plan (page 1) explains the purpose of effective records management.

The Plan is accompanied by a *Covering Letter* of support from Gary Bennett, Assessor & Electoral Registration Officer.

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

### Third Parties

The *Plan* includes reference to the scope of the Act including third parties carrying out functions of public authorities such as the Board (see for example *Plan* introduction). However, it goes on to state (page 13) "Currently no function of Lanarkshire Valuation Joint Board is carried out by a third party".

### Management Team

The Board has a Management Team, who meet monthly, that are responsible for implementing aspects of the *Plan* and reviewing the operational efficiency of that implementation.

The work of the Management Team includes:

Approving a corporate approach to the management of records

Developing policies and procedures relating to records management

Reviewing the *Plan*

The review of retention schedules

Reporting to the Senior Management Team

Review of the *Business Continuity Plan*

Promoting a culture of best practice recordkeeping

Ensuring that records management information, updates and policies are communicated to staff.

Clearly this group is of fundamental importance to information management in the authority and the Keeper thanks the Board for sharing information about its operation.

## 6. Keeper's Summary

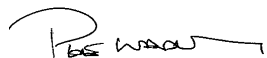
Elements 1 -14 that the Keeper considers should be in a public authority records management plan have been properly considered by Lanarkshire Valuation Joint Board. Policies and governance structures are in place to implement the actions required by the plan.

## 7. Keeper's Determination

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

- The Keeper recommends that Lanarkshire 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,



.....  
**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 Lanarkshire Valuation Joint Board. In agreeing this RMP, the Keeper expects Lanarkshire Valuation Joint Board to fully implement the agreed RMP and meet its obligations under the Act.



.....  
**Tim Ellis**  
Keeper of the Records of Scotland