

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

### **Loch Lomond and The Trossachs National Park Authority**

#### **The Keeper of the Records of Scotland**

**1<sup>st</sup> September 2017**

**Contents**

1. Public Records (Scotland) Act 2011 .....2  
3. Authority Background .....4  
4. Keeper’s Assessment Process .....5  
5. Model Plan Elements: Checklist .....6  
6. Keeper’s Summary .....23  
7. Keeper’s Determination .....23  
8. Keeper’s Endorsement..... 24

**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 Loch Lomond and The Trossachs National Park Authority by the Public Records (Scotland) Act 2011 Assessment Team following its submission to the Keeper on 27<sup>th</sup> February 2017.

The assessment considered whether the RMP of Loch Lomond and The Trossachs National Park Authority 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 Loch Lomond and The Trossachs National Park Authority complies with the Act can be found under section 7 of this report with relevant recommendations.

## 3. Authority Background

Loch Lomond & The Trossachs National Park was created in July 2002 under the National Parks (Scotland) Act 2000 to safeguard an area of outstanding and diverse landscapes, habitats and communities, parts of which were coming under severe visitor and recreational pressures. The 2000 Act set out four National Park aims, to: Conserve and enhance the natural and cultural heritage of the area; Promote sustainable use of the natural resources of the area; Promote understanding and enjoyment (including enjoyment in the form of recreation) of the special qualities of the area by the public and Promote sustainable social and economic development of the area's communities.

The aims of the Authority are delivered through three distinct areas of activity: Conservation, Visitor Experience and Rural Development, all of which are supported by enabling service areas.

<http://www.lochlomond-trossachs.org/park-authority/>

## 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 Loch Lomond and The Trossachs National Park Authority’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.
----------	--	--	----------	--	--	----------	--

## 5. Model Plan Elements: Checklist

**Loch Lomond and the Trossachs National Park Authority**  
 For simplicity this authority is referred to as ‘the Park Authority’ in the assessment below

Element	Present	Evidence	Notes
1. Senior Officer <i>Compulsory element</i>	<b>G</b>	<b>G</b>	<p>Loch Lomond and the Trossachs National Park Authority (the Park Authority) have identified Jaki Carnegie, Director of Corporate Services, as the individual with overall responsibility for records management in the authority.</p> <p>The identification of the Director of Corporate Services is supported by a <i>Covering Letter</i> from Gordon Watson, Chief Executive and by the <i>Records Management Policy (see element 3)</i> section 4.</p> <p>Ms Carnegie is the authority’s Senior Accountable Officer and, in conjunction with the ICT Manager, is responsible for information security in the authority (<b>see element 8</b>).</p> <p>Ms. Carnegie approved the <i>Plan</i>, the <i>Records Management Policy</i>, the <i>Information Security Policy</i>, the <i>Data Protection Policy</i>, the <i>Incident Response and Business Continuity Plan</i>, and the <i>Naming Conventions and Version Control Guidance</i>. She also sponsored the <i>Report on Internal Audit of Records Management 2014/15</i>.</p> <p>The Director of Corporate Services is the member of the Executive Team</p>

			<p>responsible for data protection <b>(see element 9)</b>.</p> <p>The Keeper agrees that Loch Lomond and the Trossachs National Park Authority have identified a suitable individual to this role as required by the Public Records (Scotland) Act 2011 (the Act).</p>
<p>2. Records Manager <i>Compulsory element</i></p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>The Park Authority have identified Laura Baird , Information Officer as the individual with day-to-day responsibility for implementing the <i>Plan</i>.</p> <p>The identification of the Information Officer is supported by a <i>Covering Letter</i> from Gordon Watson, Chief Executive and by the <i>Records Management Policy (see element 3)</i> section 4.</p> <p>The <i>Plan</i> makes clear that the Information Officer is responsible for “Ensuring that the Park Authority’s records management is compliant with the requirements of the Public Records (Scotland) Act 2011” (<i>Plan</i> element 2).</p> <p>Ms. Baird is also responsible for monitoring the <i>Business Classification Scheme (see element 4)</i> and <i>Retention Schedule (see element 5)</i>.</p> <p>Ms. Baird is the authority’s Data Protection Officer. She processes subject access requests and is responsible for disseminating guidance on compliance with the Data Protection Act 1998 <b>(see element 9)</b>.</p> <p>Ms. Baird revised the <i>Records Management Policy</i> in 2016.</p> <p>The Keeper agrees that Loch Lomond and the Trossachs National Park Authority have identified a suitable individual to this role as required by the Act.</p>

<p>3. Policy <i>Compulsory element</i></p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>Loch Lomond and the Trossachs National Park Authority have a <i>Records Management Policy</i> which has been provided to the Keeper. This is version 2.0 approved by Jaki Carnegie (<b>see element 1</b>) in October 2016.</p> <p>The Keeper agrees that the Plan supports the <i>Records Management Policy</i>.</p> <p>An intranet screen-shot has been provided showing staff can access records management documents and training.</p> <p>The <i>Policy</i> is available to the public at: <a href="http://www.lochlomond-trossachs.org/rr-content/uploads/2017/02/Records-Management-Policy.pdf">http://www.lochlomond-trossachs.org/rr-content/uploads/2017/02/Records-Management-Policy.pdf</a> The Keeper commends this publication.</p> <p>The <i>Records Management Policy</i> mentions the Act.</p> <p>The Keeper agrees that Loch Lomond and the Trossachs National Park Authority have a records management policy statement as required by the Act.</p>
<p>4. Business Classification</p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>The Park Authority’s <i>Records Management Policy</i> (<b>see element 3</b>) identifies good records management is reliant on “the capture of records (received or created) in record keeping systems”.</p> <p>With this in mind the authority has created a <i>Business Classification Scheme</i>, which they have shared with the Keeper. Version 2.0 October 2016.</p> <p>“The Business Classification Scheme reflects the folder structure on the Park Authority’s shared ‘R’ drive where electronic records are filed.” (<i>Policy</i> section 1). The R drive is the central shared drive for all electronic records. It has restricted areas for sensitive information where appropriate. The Park Authority operates a line-of-business system, for planning, separate from the R drive.</p>

			<p>The Park Authority also manage public records held in hard copy format. However, these are also accounted for in the <i>Business Classification Scheme</i> .</p> <p>The <i>Business Classification Scheme</i> shows Function/Activity and Transaction. For example: Outdoor Access &amp; Recreation/Strategic route management/maintenance plans &amp; agreements. The Keeper agrees that this level of detail is satisfactory for the requirements of the Act.</p> <p>The upper levels of the <i>Classification Scheme</i> are imposed on the business areas centrally with record types populated locally. This is a system which works well elsewhere and effectively encourages engagement from local service areas. Changes to the upper levels can only be made with approval of the Information Officer (<b>see element 2</b>).</p> <p>The Keeper agrees the <i>Business Classification Scheme</i> supports aspirations in the <i>Records Management Policy</i> (section 1).</p> <p>The Keeper agrees that Loch Lomond and the Trossachs National Park Authority have a 'business classification scheme' that appropriately reflects the functions of the authority.</p>
5. Retention schedule	<b>G</b>	<b>G</b>	<p>The Park Authority's <i>Records Management Policy</i> (<b>see element 3</b>) identifies good records management is reliant on "the controlled retention of information."</p> <p>The Park Authority have submitted their <i>Retention Schedule</i> to the Keeper.</p> <p>A sample from the <i>Retention Schedule</i> shows that Strategic route management maintenance plans are held for 10 years and then destroyed.</p>

			<p>Intranet screen-shots have been provided showing staff can access the <i>Retention Schedule</i> as well as other records management documents and training.</p> <p>The Keeper agrees the <i>Retention Schedule</i> supports aspirations in the <i>Records Management Policy</i> (section 1).</p> <p>This must remain a business decision for the Park Authority and, but the Keeper would ask them to consider combining the <i>Business Classification Scheme</i> and the <i>Retention Schedule</i> in the future. This might create a single, stronger, business tool that should provide one source of information for the authority’s staff. However, this is not a requirement of the Act.</p> <p>The Information Officer (<b>see element 2</b>) works with local business areas to ensure the regular review of retention decisions. The Keeper commends the inclusion of local service areas with this process to better promote buy-in from record creators.</p> <p>The Keeper agrees that the Park Authority has a retention schedule matched with the business classification scheme.</p>
<p>6. Destruction Arrangements <i>Compulsory element</i></p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>Loch Lomond and the Trossachs National Park Authority note in their <i>Records Management Policy</i> (section 2) (<b>see element 3</b>) that records should be destroyed “in accordance with business need, statutory and legislative requirements” and that good records management is reliant on “the controlled destruction of information.”</p> <p>With these objectives in mind, the Park Authority has the following processes in place to ensure the secure and irretrievable destruction of records when appropriate:</p>

			<p><u>Paper (Internal)</u>: Internal hard copy records are destroyed using a third-party shredding company. A shredding certificate has been provided as evidence that these arrangements are operational.</p> <p><u>Paper (external)</u>: The <i>Plan</i> states: “The Park Authority has no records held in off-site storage by external storage providers.”</p> <p><u>Electronic</u>: The Information Officer (<b>see element 2</b>) works with local business areas to ensure the regular destruction of electronic records according to the <i>Retention Schedule</i>. The routine destruction of electronic records held on shared drives (and therefore not automatically deleted) is a problem for many Scottish public authorities. It appears that Loch Lomond and the Trossachs National Park Authority is satisfied that the personal involvement of the Information Officer in this process will suffice (at least in the short-term). With a single shared drive covering the entire organisation this may prove adequate. <b>However, the Keeper will be interested in updates regarding this procedure going forward.</b></p> <p><u>Hardware</u>: The secure destruction of records held on redundant hardware is carried out by a third party contractor. A statement from the ICT supplier has been provided as confirmation of this arrangement. This is supported by statements in the <i>Information Security Policy (see element 8)</i> section 9.</p> <p><u>Back-Ups</u>: The Park Authority have submitted a statement from their ICT supplier which explains that electronic records are protected for continuity purposes (<b>see also element 10</b>). This document details the back-up cycle including how long records remain available before they are irretrievably deleted.</p> <p>The Keeper agrees that the procedures above are a suitable response to the <i>Records Management Policy</i> objective of enabling the authority to “dispose of records safely and at the right time.” (<i>Policy</i> section 2).</p>
--	--	--	--

			<p>The Keeper agrees that Loch Lomond and the Trossachs National Park Authority have procedures in place to ensure 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 Park Authority have identified the National Records of Scotland (NRS) as the appropriate repository for records identified as suitable for permanent preservation.</p> <p>A Memorandum of Understanding regarding the transfer of records from the Park Authority to NRS is being negotiated at the time of this assessment. This is confirmed by the NRS Client Management Team.</p> <p>The Keeper agrees these arrangements are supportive of the authority’s statement “Senior management also recognise the importance of maintaining a corporate memory of events and activities...” (<i>Plan</i> introduction) and that records can be preserved (<i>Policy</i> section 2). The intention to create a corporate memory is also mentioned in the <i>Plan</i> at element 11.</p> <p>The <i>Plan</i> states under this element: “Where agreement is reached for records to be transferred, this process will be formalised by a Memorandum of Understanding (MOU) with the National Records of Scotland. Arrangements for the preservation of digital records will be included in this MOU.” The Keeper agrees this action.</p> <p><b>The Keeper agrees this element of Loch Lomond and the Trossachs National Park Authority’s <i>Records Management Plan</i> on ‘improvement model’ terms. This means that he acknowledges that the authority, having identified a gap in provision, have put processes in place to close that gap, in this case by formalising an MOU to secure archiving arrangements. The Keeper’s agreement is conditional on his receiving a copy of the signed MOU when it becomes available.</b></p>

<p>8. Information Security <i>Compulsory element</i></p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>The Park Authority have a <i>Information Security Policy</i> which has been provided to the Keeper. This is version 1.0 approved by Jaki Carnegie (see element 1) in March 2014.</p> <p>The <i>Information Security Policy</i> is supported by the Park Authority's <i>IT Policy</i> (May 2012) and <i>Data Protection Policy</i> (April 2014) which have also been supplied to the Keeper.</p> <p>This policy supports the Park Authority's <i>Records Management Policy</i> (see element 3) where it identifies good records management leading to "information being properly protected and securely stored." (section 1) and a commitment to protect records and store them securely (section 2).</p> <p>Arrangements for reporting information security incidents are explained in the <i>Information Security Policy</i> (section 22). Physical security of paper files and servers is covered in the <i>Information Security Policy</i> (section 7) and features in the <i>Plan</i> under element 11.</p> <p>The information security provision in the authority is mapped against BS7799-2.</p> <p>The <i>Information Security Policy</i> mentions the Data Protection Act 1998 (<b>see element 9</b>).</p> <p>An intranet screen-shot has been provided showing staff can access information security documents.</p> <p>The Keeper agrees that Loch Lomond and The Trossachs National Park Authority have processes in place to ensure the security of the records they hold as required by the Act.</p>

9. Data Protection	<b>G</b>	<b>G</b>	<p>The Park Authority have a <i>Data Protection Policy</i> which has been provided to the Keeper. This is version 1.0 approved by Jaki Carnegie (<b>see element 1</b>) in April 2014.</p> <p>The <i>Data Protection Policy</i> explains the (current) eight principles of data protection.</p> <p>The Park Authority are registered as data controllers with the Information Commissioner: Z6815521</p> <p>Subject access request information is available to the public.  <a href="http://www.lochlomond-trossachs.org/park-authority/freedom-of-information/accessing-personal-information/">http://www.lochlomond-trossachs.org/park-authority/freedom-of-information/accessing-personal-information/</a></p> <p>Staff instruction on how to deal with subject access requests forms a section of the <i>Data Protection Policy</i> (section 10).</p> <p>The Information Officer (<b>see element 2</b>) is the Park Authority's Data Protection Officer and is responsible for disseminating guidance on compliance with the Data Protection Act 1998.</p> <p>The Data Protection Act 1998 is specifically mentioned in the <i>Records Management Policy</i> (<b>see element 3</b>).</p> <p>An intranet screen-shot has been provided showing staff can access records management documents and training.</p> <p>The forthcoming (May 2018) responsibilities placed on public authorities by the General Data Protection Regulations are acknowledged in the <i>Plan</i> (for example under element 5).</p>

			The Keeper agrees that Loch Lomond and the Trossachs National Park Authority have properly considered their responsibilities under the Data Protection Act 1998.
10. Business Continuity and Vital Records	<b>G</b>	<b>G</b>	<p>The Park Authority operate a <i>Incident Response and Business Continuity Plan</i> which, in redacted form, has been provided to the Keeper. This is version 1.4. The Keeper agrees that the redaction of this document is appropriate.</p> <p>The Keeper agrees that the <i>Incident Response and Business Continuity Plan</i> considers the recovery of records in an emergency.</p> <p>The business recovery systems underwent an internal audit in February 2017 and were considered appropriate. The internal audit report has been shared with the Keeper and he thanks the Park Authority for this inclusion.</p> <p>Business continuity arrangements support the objectives of the <i>Information Security Policy (see element 8)</i>.</p> <p><b>For back-ups see also element 6.</b></p> <p>An intranet screen-shot has been provided showing staff can access records management documents and training.</p> <p>The Keeper agrees that Loch Lomond and the Trossachs National Park Authority have an approved and operational Business Continuity policy and that information management and records recovery properly feature in the authority's plans.</p>
11. Audit trail	<b>G</b>	<b>G</b>	The Park Authority's <i>Records Management Policy (see element 3)</i> states that efficient records management should lead to "records being easily and efficiently

			<p>located, accessed and retrieved” and that effective records keeping “ensures that records can be...retrieved... in accordance with business need, statutory and legislative requirements.” (both <i>Policy</i> section 1).</p> <p>With this objective in mind, the Park Authority have the following procedures in place to track records and identify versions:</p> <p><u>Paper</u>: Hard copy records are tracked using ‘sign-out’ sheets. A sample has been provided to the Keeper.</p> <p><u>Electronic</u>: The Keeper agrees that certain line of business systems operated by the Authority will have document tracking functionality built-in (for example idox). The bulk of the authority’s electronic records are held on a central shared drive (the R drive). Location and identification of records in this drive relies on staff following naming convention/version control guidance and to this end the Park Authority has a <i>Naming Convention and Version Control Guidance</i> document which has been shared with the Keeper.</p> <p>The Keeper agrees that the robust implementation of tracking procedures should assist in the authority’s commitment to “enable efficient, accurate and complete retrieval of information.” (<i>Records Management Policy</i> section 2).</p> <p>The Keeper agrees Loch Lomond and The Trossachs National Park Authority has procedures in place that will allow them to locate their records and assure themselves that the located record is the correct version.</p>
12. Competency Framework for records	<b>G</b>	<b>G</b>	Loch Lomond and the Trossachs National Park Authority have included Laura Baird’s annual objectives as part of their evidence package. This shows that she is responsible for designing and delivering the <i>Records Management Plan</i> . The <i>Records Management Policy</i> confirms that the Information Officer is responsible for:

<p>management staff</p>			<p>“creating, maintaining and implementing records management standards.”</p> <p>They have also submitted the <i>Information Officer Competencies</i> for Ms Baird. These show that she has the relevant skills to undertake these responsibilities and that the Information Officer role was specifically created to “undertake the activities required to ensure the Park Authority is fully compliant with its statutory responsibilities in relation to the Public Records Scotland act 2011.”</p> <p>“The Information Officer holds a postgraduate qualification in records management, is a member of the Information and Records Management Society and the Scottish Council on Archives, and has attended relevant training courses on Records Management topics over a number of years.” (<i>Plan</i> element 12)</p> <p>The Park Authority have committed publically to ensure staff are trained in records management, as appropriate to their role. (<i>Records Management Policy – see element 3 – section 2</i>).</p> <p>The Information Officer (<b>see element 2</b>) is responsible for implementing records management training. Operational managers are responsible for ensuring their staff undertake this training (<i>Policy</i> section 4 and <i>Information Security Policy</i> section 14).</p> <p>The Information Officer trains new staff on key records management issues at induction. Furthermore she is scheduled to attend team meetings over the next year to provide refresher training. The Keeper acknowledges this programme as further evidence that records management is properly considered in the authority.</p> <p>An intranet screen-shot has been provided showing staff can access records management training. The Keeper has also been supplied with sample training slides. He thanks the authority for this inclusion.</p>
-------------------------	--	--	---

			<p>The <i>Data Protection Policy</i> (<b>see element 9</b>) specifically commits the authority to provide staff with data protection training (<i>Data Protection Policy</i> section 15).</p> <p>The <i>Information Security Policy</i> (<b>see element 8</b>) specifically commits the authority to provide staff with information security training (<i>Information Security Policy</i> section 4).</p> <p>The Keeper agrees that Loch Lomond and the Trossachs National Parks Authority have provided evidence that the individual identified at element 2 has the necessary, objectives, seniority and skills to undertake the day-to-day implementation of the <i>Records Management Plan</i>. Furthermore, the Keeper agrees that the authority has properly considered training of other staff where appropriate.</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>Loch Lomond and the Trossachs National Park Authority have created procedures to ensure that this review is carried out.</p> <p>The Information Officer (<b>see element 2</b>) delivers updates to the Organisational Development Strategy Review and to the Delivery Group (quarterly). Reports are provided to the Audit Committee and these are published on the authorities website. For example <a href="http://www.lochlomond-trossachs.org/park-authority/our-board-committees/meetings/">http://www.lochlomond-trossachs.org/park-authority/our-board-committees/meetings/</a> (Audit Committee 6<sup>th</sup> December 2016 appendix 1 - Records Management).</p> <p>Improvement projects are tracked using a self-assessment Gantt Chart which has been shared with the Keeper.</p> <p>Ms. Baird (<b>see element 2</b>) revised the <i>Records Management Policy</i> in 2016 and is committed to continue periodic reviews “regularly”.</p>

			<p>All backup, business continuity and disaster recovery systems are reviewed and tested on an annual basis and after each significant change or upgrade.</p> <p>The authority's registration with the Information Commissioner is currently due to be renewed by 23 June 2018. The Keeper accepts that this may change under GDPR coming into force May 2018.</p> <p>The Keeper notes that, prior to the creation of the <i>Plan</i>, the Park Authority engaged external auditors to benchmark their records management provision. The Keeper commends this action.</p> <p>The Keeper agrees that Loch Lomond and the Trossachs National Park Authority have made arrangements for the review of the implementation of their Records Management Plan as required by the Public Records (Scotland) Act 2011. The Keeper has seen evidence of responsibilities, reporting system, timescale and methodology of this review.</p>
<p>14. Shared Information</p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>The Park Authority routinely share information with other Scottish public authorities and have provided the Keeper with the <i>Data Sharing Policy</i> and a template <i>Data Sharing Agreement</i> to show the issues considered at the outset of a formal data sharing arrangement with the authority.</p> <p>This is supported by statements in the <i>Information Security Policy</i> (<b>see element 8</b>) section 18.</p> <p>The Keeper notes that the Park Authority is negotiating further data sharing protocols with Scottish Public Authorities and expects that these will include information governance clauses as appropriate.</p>

			The Keeper agrees that Loch Lomond and the Trossachs National Park Authority formally consider information governance/records management responsibilities at the outset of data sharing projects.
--	--	--	---

**Loch Lomond and the Trossachs National Park Authority**  
For simplicity this authority is referred to as ‘the Park Authority’ in the assessment below

**General Notes on RMP, Including Concerns:**

Version: This assessment is on the *Records Management Plan* (the *Plan*) of Loch Lomond and the Trossachs National Park Authority (the Park Authority) submitted to the Keeper of the Records of Scotland in February 2017. This version 1.0.

The *Plan* is accompanied by a letter from Gordon Watson, Chief Executive, dated 27<sup>th</sup> February 2017 in which he confirms that he is “entirely supportive of and fully endorse the RMP adopted by the Park Authority”. He also approves the *Plan* on its front page.

The Park Authority acknowledges records as a business asset (for example *Plan* Introduction, *Records Management Policy* section 2 or *Information Security Policy* section 1). The Keeper commends this recognition.

The *Plan* mentions the Public Records (Scotland) Act 2011 (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>.

The Keeper agrees that the Plan represents a contribution to the Scottish Government National Outcomes (as published in the *Loch Lomond and the Trossachs National Park Partnership Plan 2012-2017*) "Our public services are high quality, continually improving, efficient and responsive to local people’s needs."

[http://www.lochlomond-trossachs.org/rr-content/uploads/2016/07/Our-Plans\\_NationalParkPartnershipPlan2012-2017.pdf](http://www.lochlomond-trossachs.org/rr-content/uploads/2016/07/Our-Plans_NationalParkPartnershipPlan2012-2017.pdf)

Third Parties:

The Act makes it clear that records created by a contractor in carrying out a scheduled authority's functions are public records (Part 1 section 3.1 (b)).

There are currently no functions of the Park Authority carried out by a third party.

## 6. Keeper's Summary

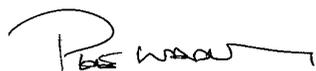
Elements 1 – 14 that the Keeper considers should be in a public authority records management plan have been properly considered by Loch Lomond and The Trossachs National Park Authority. Policies and governance structures are in place to implement the actions required by the plan.

## 7. Keeper's Determination

Based on the assessment process detailed above, the Keeper **agrees** the RMP of **Loch Lomond and The Trossachs National Park Authority**.

- The Keeper recommends that Loch Lomond and The Trossachs National Park Authority 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 Loch Lomond and The Trossachs National Park Authority. In agreeing this RMP, the Keeper expects Loch Lomond and The Trossachs National Park Authority to fully implement the agreed RMP and meet its obligations under the Act.



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