

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

### **Lothian Valuation Joint Board Assessment Report**

**The Keeper of the Records of Scotland**

**31st March 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 the **Lothian Valuation Joint Board** by the Public Records (Scotland) Act 2011 Assessment Team following its submission to the Keeper on **26<sup>th</sup> October 2015**.

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

## 3. Authority Background

Lothian Valuation Joint Board state their mission as:

1. To ensure timeous publication and maintenance of the Valuation Roll.
2. To ensure timeous publication and maintenance of the Council Tax List.
3. To ensure timeous publication and maintenance of the Electoral Register through the transition and introduction of IER [Individual Electoral Registration].
4. To develop, prepare and publish reports to improve customer knowledge and ensure attainment of good Community Focus.

5. To set standards and undertake corporate improvement in Service Delivery Arrangements and review the performance management and planning framework to ensure continuous improvement.
6. To review roles, responsibilities, Structures and Processes to ensure effective balance of responsibility and authority.
7. To review, monitor and maintain organisational Risk Management and Internal Controls to ensure efficient and effective delivery of service.
8. To develop, adopt and review formal documentation and systems to ensure Standards of Conduct are adhered to.
9. To plan and deliver an organisational development strategy considering corporate initiatives to ensure efficiency and quality of service delivery.
10. To engage in key partnership working to ensure the integrated delivery of efficient government.

The Board comprises of elected members from each of the four constituent authorities. The membership reflects both the political and geographic characteristics of each of the authorities. The Board has in place an Appeals Sub-Committee, an Appointments Committee and a Joint Consultative Group.

<http://www.lothian-vjb.gov.uk/>

## 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 Lothian 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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**Lothian Valuation Joint Board**  
**(For simplicity described as ‘the Board’ in the assessment below)**

**5. Model Plan Elements: Checklist**

Element	Present	Evidence	Notes
1. Senior Officer <i>Compulsory element</i>	<b>G</b>	<b>G</b>	<p>Lothian Valuation Joint Board (the Board) have identified Joan M Hewton, Assessor &amp; Electoral Registration Officer, as the individual with overall records management responsibility in the authority.</p> <p>This is confirmed by a <i>Covering Letter</i> from Ms Hewton dated October 2015 and by the <i>Records Management Policy (see element 3)</i>.</p> <p>Ms Hewton chairs the Records Management Group (<b>see under General Comments below</b>). In this role she is responsible for monitoring the internal compliance with records management policies and guidance (<i>Policy</i> section 10).</p> <p>The Assessor is the ‘owner’ of the <i>Records Management Policy (see element 3)</i>.</p> <p>The Assessor is responsible for the Board’s compliance with the Data Protection Act 1998 (<b>see element 9</b>).</p> <p>The Keeper agrees that the Board have identified an appropriate 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>Lothian Valuation Joint Board (the Board) have identified Brian Brown, Head of Administration as the individual with day-to-day responsibility for the implementation of the <i>Plan</i>.</p> <p>This is confirmed by the <i>Records Retention and Disposal Policy a Covering Letter</i> from Ms Hewton (<b>see element 1</b>) and by the <i>Records Management Policy (see element 3)</i>.</p> <p>Mr Brown’s job description has been supplied. This shows that he has responsibility “To undertake administration of records management to ensure LVJB meets its statutory obligations under the Public Records (Scotland) Act 2011.”</p> <p>The Keeper agrees that the Board has identified an appropriate individual to this role required by the Act.</p>
<p>3. Policy <i>Compulsory element</i></p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>The Board have a <i>Records Management Policy</i> which has been provided to the Keeper. This is version 1 approved by the Senior Management Group in August 2015 (revised from June 2012).</p> <p>The <i>Policy</i> states: “It is the policy of LVJB to maintain reliable and useable records, which are capable of supporting business functions and activities for as long as they are required. This will be achieved through the consolidation and establishment of effective records management policies and procedures...” (<i>Policy</i> 5.2 also quoted in <i>Plan</i> page 9).</p> <p>The <i>Records Management Policy</i> is published on-line at <a href="http://www.lothian-vjb.gov.uk/download/foi/LVJB_%20Records_Management_Policy.pdf">http://www.lothian-vjb.gov.uk/download/foi/LVJB_%20Records_Management_Policy.pdf</a></p> <p>The Keeper agrees that the objectives of the <i>Policy</i> are supported by the <i>Plan</i>.</p>

			<p>The Policy is further supported by the <i>Records Retention and Disposal Policy</i> which has been supplied to the Keeper. The supplied version of this document is also version 1 agreed by the Senior Management group in August 2015.</p> <p>The <i>Records Management Policy</i> explains the purpose of robust records management (section 1, 3.4 and 4.2). It mentions the Act and cross references the Board's <i>Plan</i> (for example section 2.4 and 2.5).</p> <p>The <i>Policy</i> specifically references compliance with the Data Protection Act (<b>see element 9</b>).</p> <p>The Keeper agrees that the Board has an approved and operational records management policy as required by the Act.</p>
4. Business Classification	<b>G</b>	<b>G</b>	<p>The <i>Records Management Policy</i> (<b>see element 3</b>) commits the Board to ensure that all information received or created is stored in the appropriate way and is easily retrievable (section 5.2). There is a commitment to develop a business classification scheme at section 5.1.</p> <p>In response to these commitments, the Board has a <i>Business Classification Scheme</i> that has been supplied to the Keeper.</p> <p>This document is a single spreadsheet presented in an information asset register style. This means that it includes retention decisions, location, whether vital or not (<b>see element 10</b>) and other business-useful categories. At the core it is structured around function, activity and transaction. For example Electoral Registration/Absent Voters/Expired Absent Voter Applications.</p> <p>The format of a <i>Business Classification Scheme</i> must remain the business decision of an authority, but the Keeper acknowledges that a single detailed document based</p>

			<p>on function, as operated by the Board, is currently considered best practice.</p> <p>The Keeper notes that Guidance on managing paper and electronic records will be produced (<i>Plan</i> page 10). The Board have committed to provide the Keeper with sight of this guidance when available.</p> <p>The Keeper agrees that the Board has a <i>Business Classification Scheme</i> that appears to cover all the functions of the authority.</p>
5. Retention schedule	<b>G</b>	<b>G</b>	<p>The Board operate a single information asset register covering all the activities of the organisation and the retention decisions attached to the record types associated with those activities (<b>see element 4</b>). The authority for retention decisions is also given; the Keeper commends this inclusion.</p> <p>The <i>Records Management Policy</i> (<b>see element 3</b>) requires the Board to establish “The review and consolidation of the retention and disposal schedule...” (Policy section 5.1). A thorough explanation of the procedure for setting retention periods is given in the <i>Records Retention &amp; Disposal Policy</i> (section 4.3).</p> <p>The Keeper agrees that the Board has an operational retention schedule that covers all the record types detailed in the <i>Business Classification Scheme</i>.</p>
6. Destruction Arrangements <i>Compulsory element</i>	<b>G</b>	<b>G</b>	<p>The Board’s Records Management Policy (<b>see element 3</b>) commits the authority to ensure all information is destroyed in accordance with the Board’s Retention and Disposal arrangements (Policy section 5. 1 and 5.2 - quoted in Plan page 9 – and Policy section 3.2 ) .</p> <p>The Records Retention &amp; Disposal Policy refers to the importance of not keeping records longer than necessary (section 4).</p>

			<p>To this end the Board has in place the following arrangements:</p> <p>Paper: Paper records are irretrievably destroyed by a third party contractor off-site. A recent Destruction Certificate has been provided as evidence that this arrangement is operational.</p> <p>Electronic: Detailed guidance on the procedure for the destruction of electronic records is provided to staff in the Records Retention &amp; Disposal Policy (section 4 and Appendix 1). A screen-shot has been supplied to demonstrate staff access to this guidance.</p> <p>The Keeper notes that automatic data disposal is being considered for some of the Board's electronic systems. The Board states: "In the case of SharePoint, depending on the retention schedule, the information asset owner could be notified to review a document, or a document could be automatically deleted. In the case of Civica, scheduled tasks can be created so that documents are automatically deleted when they meet the criteria for deletion in the retention schedule".</p> <p>Hardware: Detailed guidance on the procedure for the destruction of media such as "USB drives; hard disks; DVDs and CDs" is provided to staff in the Records Retention &amp; Disposal Policy (section 4.7)</p> <p>Back-Ups: The Board state: "LVJB currently undertake 4 hourly replication between ourselves and our off-site storage at Pulsant. This ensures that data deleted from our network is removed from Pulsant within a 4 hour window. VEEAM backups are held both on-site and at Pulsant which reflect any change within a 30 day period (length of backup retention). It should be noted that Sungard is our Disaster Recovery site which would connect to Pulsant in the event of any disaster scenario,</p>
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			<p>no data is stored there.”</p> <p>There is an acknowledgment in the Records Retention and Disposal Policy (section 4.5) that working copies should be destroyed at the end of their business use regardless of the retention period of the original record. The Keeper welcomes this acknowledgement.</p> <p>Statements in the Records Retention and Disposal Policy, particularly Annex A, support those in the Plan.</p> <p>The Board maintains a destruction log. The Keeper has had sight of a disposal template which records the removal of records. This record is retained for 10 years.</p> <p>The Keeper agrees that the Board has processes in place to irretrievably and securely destroy records as required by the Act.</p>
<p>7. Archiving and Transfer <i>Compulsory element</i></p>	<p><b>G</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 acknowledge the value of an archive at several points in the text both of the <i>Plan</i> and of supporting documents. For example under element 1 they refer to “LVJB’s corporate memory” and “transferring any records of historical value to an archive for permanent preservation.” (both <i>Plan</i> page 7); “transferring any records of historical value to an archive” (<i>Covering Letter</i> from Assessor); “Archival Value” (<i>Records Retention &amp; Disposal Policy</i> section 4.3.3); “records that may have been transferred to an archive...” . (<i>Records Management Policy</i> section 2.2)</p> <p>Edinburgh City Council provide archiving facilities for Board records as explained in the <i>Plan</i> (page 13): Currently Edinburgh City Council hold architect plans for</p>

			<p> dwellings. In the future, board minutes may also be passed to the archive. These are currently held securely by the Board.</p> <p>The Board have provided the Keeper with an e-mail from Edinburgh City Council’s Archivist indicating that this arrangement is operational.</p> <p>The Keeper agrees that the Board have identified a suitable archive repository for the permanent retention of certain records and that arrangements are already operational to transfer records to this repository.</p>
<p>8. Information Security <i>Compulsory element</i></p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>The Board have an Information Technology Management and Security Policy which has been provided to the Keeper. This is version 8. It is 72 page policy document made up, in part, of a suite of specific information security policies that appear as appendices. These include the Board’s Information Handling Policy, E-mail/Internet Policy and the Clean Desk Policy.</p> <p>A screen-shot has been provided in evidence of staff access to this policy.</p> <p>The Security Policy specifically refers to data protection issues “To prevent information about individuals being used in an inappropriate manner, responsibility for managing information privacy has been established and security controls for the handling of personal data applied .”</p> <p>The Records Management Policy (<b>see element 3</b>) supports robust information security (for example sections 3.2 and 5.1)</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 <i>Plan</i> states (page 5): “LVJB is committed to adherence to the data protection principles.” This is supported by statements at <i>Plan</i> page 9.</p> <p>The Board have a <i>Data Protection Policy</i> which has been provided to the Keeper. This is version 1 approved by the Senior Management Group in October 2015. The <i>Policy</i> is ‘owned’ by the Human Resources Manager who sits on the Records Management Group (<b>see under General Comments below</b>).</p> <p>The <i>Data Protection Policy</i> supports the commitments in both <i>Records Management Plan</i> and <i>Records Management Policy</i> and states “Lothian Valuation Joint Board supports the objectives of the Data protection Act 1998...” (<i>DP Policy 1</i>)</p> <p>The Board is registered with the Information Commissioner: Z5952686.</p> <p>Subject access request procedure is explained in the <i>DP Policy</i> (section 6).</p> <p>The DP Policy includes the 8 principles of data protection currently in use. The Plan contains a section on data protection that is separate from the text of element 9 (section 2). This also lists the 8 principles.</p> <p>The Security Policy (see element 8) specifically refers to data protection issues “To prevent information about individuals being used in an inappropriate manner, responsibility for managing information privacy has been established and security controls for the handling of personal data applied .”</p> <p>The Records Retention &amp; Disposal Policy refers to the importance of not keeping records longer than necessary (section 4).</p> <p>Overall responsibility for compliance with the Data Protection Act 1998 lies with the Assessor (<b>see element 1</b>) however, the Data Protection Policy mentions that the</p>
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			<p>Board also has a 'Data Protection Officer' this role falls to the Depute Assessor.</p> <p>The Records Management Policy contains a commitment by the Board to “The review and consolidation of data protection policies...” (Records Management Policy section 5.1).</p> <p>The Keeper agrees that the Board have 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 have a <i>Business Continuity Plan</i> which has been supplied to the Keeper. This is the version from July 2005 (last revised April 2015).</p> <p>The Keeper agrees that consideration of the recovery of records is a feature of the <i>Business Continuity Plan</i>. For records held electronically, the LVJB contingency plan or disaster recovery procedure has been implemented using a third party provider called 'Sungard' (<i>Information &amp; Technology Management and Security Policy</i> section 4.15).</p> <p>Vital records are detailed in the <i>Business Classification Scheme</i> (<b>see element 4</b>). For example, the Scheme shows that “Lands Tribunal Decisions” are a vital record series for the organisation while “Royal Mail Invoices” are not. The recovery of “critical” systems is a feature of the IT section of the <i>Business Continuity Plan</i>.</p> <p>The <i>Business Continuity Plan</i> fulfils a commitment in the Board’s <i>Records Management Policy</i> (<b>see element 3</b>) (<i>Policy</i> section 5.1)</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</p>

			vital records their central records management document.
11. Audit trail	<b>A</b>	<b>G</b>	<p>The <i>Records Management Policy</i> (<b>see element 3</b>) commits the Board to “ensure that all information is easily accessible to users...” (<i>Policy</i> section 5.2 and quoted in <i>Plan</i> page 9). The <i>Policy</i> also states an aim to improve business efficiency “through less time spent searching for information” (section 2.4, 3.2 and 5.1).</p> <p>The Plan states that electronic records can be tracked by the application in which they were created and that this can be backed up by the imposition of naming conventions and version control. The Keeper notes that the Board is currently working on relevant file naming conventions (<i>Plan</i> page 10). He agrees that this should assist in locating records when necessary. The <i>Records Management Policy</i> also indicates the value of naming conventions and version control (section 3.2).</p> <p>Paper records (N.B. the Board is moving towards an all-electronic environment) are tracked using a withdrawal slip process. A sample <i>Admin Proforma</i> has been supplied as evidence of this system.</p> <p><b>The Keeper can agree this element of the Board’s plan under ‘improvement model’ terms. This means that he acknowledges that the Board has identified a gap in provision (version control and naming convention improvements are not yet fully in place). The Keeper recognises that the Board have put processes in place to close this gap (the adoption of SharePoint). The Keeper’s agreement is conditional on his being updated as this project progresses.</b></p>
12. Competency Framework	<b>G</b>	<b>G</b>	The Board have supplied the Keeper with the <i>Job Description</i> of the Head of Administration ( <b>see element 2</b> ). This shows that that individual has appropriate responsibility for implementing the <i>Plan</i> .

<p>for records management staff</p>			<p>The Board make the following statement: “The Head of Administration responsible for operational records management will be afforded the opportunity to attend any relevant courses, seminars or conferences as and when required.” The Keeper welcomes this commitment.</p> <p>The Board’s <i>Records Management Policy (see element 3)</i> contains a section on training (section 9) which contains the following commitment “A training programme will be provided to all staff in order to highlight and increase awareness of their responsibilities in line with data protection, freedom of information and records management”. This commitment is supported by the <i>Records Retention and Disposal Policy</i> (section 7). The Keeper will be advised when training programme is rolled out.</p> <p>“The Depute Assessor and Heads of Service are responsible for offering advice and guidance regarding records management to all staff within their service...” (<i>Policy 6.4</i>)</p> <p>Appropriate staff have undergone information security training which will be refreshed annually (<i>Plan</i> page 14). All staff must complete online data protection training (<i>Plan</i> page 18).</p> <p>The <i>Records Management Policy (see element 3)</i> has training as a separate section (section 9).</p> <p>The <i>Records Retention and Disposal Policy</i> contains a separate section on “Staff Communication &amp; Training” (section 7). This states that an information handling online learning module is operational in the Board. Protecting Information Level 1 Module has been attached as evidence.</p>
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			<p>The Keeper agrees that the Board have ensured that the individual identified at element 2 has the required authority and skills to implement the <i>Plan</i>. They also consider training opportunities for this staff member and for other members of staff when 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>The Board’s <i>Records Management Policy (see element 3)</i> states (section 5.2) “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 5.1 of the <i>Policy</i>).</p> <p>The Board have set a first review date of August 2016 and then every two years under section 10 of the <i>Policy</i>. The first review date is confirmed in the introduction to the <i>Plan</i> (page 4).</p> <p>The review of the Plan is the responsibility of the Records Management Group (<b>see under General Comments below</b>) using a self-audit system already in place in the authority. The results will be reported to Senior Management.</p> <p>The Board have supplied a sample Report as evidence of the self-audit system.</p> <p>The <i>Records Management Policy (see element 3)</i> is due for review in August 2016 and then every 2 years subsequently.</p> <p>The Board commits to continuous review of the <i>Retention and Disposal Schedule</i></p>

			<p><b>(see element 4)</b> (plan page 11). This commitment is supported by the <i>Records Retention &amp; Disposal Policy</i> (section 4.2)</p> <p>Senior Management reviews the <i>Business Continuity Plan</i> twice yearly <b>(see element 10)</b>.</p> <p>The <i>Data Protection Policy</i> <b>(see element 9)</b> is due for review annually (next review October 2016).</p> <p>The <i>Records Retention and Disposal Policy</i> is due for review by end August 2016 and then every two years.</p> <p>The internal audit manager is a member of the Records Management Working Group and will be involved in the review of the Plan.</p> <p>The Keeper agrees that the Board have processes in place to review the records management plan as required by the Act.</p>
14. Shared Information	<b>G</b>	<b>G</b>	<p>Lothian 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 four local authorities that constitute the area of responsibility of the joint board.</p> <p>They do this under terms laid out in “appropriate agreements”.</p> <p>The Board have supplied a sample data agreement in evidence. The Keeper agrees that the agreement considers information governance.</p> <p>The Keeper agrees that Lothian Valuation Joint Board properly considers</p>

			information governance when implementing information sharing processes with third parties.
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**Lothian Valuation Joint Board**

(For simplicity described 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 Lothian Valuation Joint Board version 1.

This version was approved by the Senior Management Group in August 2015. It is owned by Joan M Hewton, Assessor (**see element 1**). It will be reviewed by August 2016 (**see element 13**).

The introduction to the *Plan* explains the benefits of robust records management (page 4).

The *Plan* recognises records as a corporate asset (for example *Plan* page 9, page 14, page 15 *Policy* section 1, section 4 *Retention Policy* section 1). The Keeper welcomes this recognition.

The *Plan* is accompanied by a *Covering Letter* from Joan M Hewton, Assessor and Electoral Registration Officer, dated 23<sup>rd</sup> October 2015. In this letter Ms Hewton identifies herself as the individual with overall responsibility for records management in the Joint Board.

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>.

### **Records Management Group**

The Board has a Records Management Group supporting, and chaired by, the Assessor (**see element 1**). This group is established to respond to “records management issues and concerns” throughout the authority (*Plan* page 7). It has responsibility for the implementation of the Board’s *Records Management Plan*, ensure compliance with legal and professional standards in record-keeping and to respond to regular update reports on the progress of implementation of the *Plan* (*Policy* section 10).

The make-up of this group is detailed in the *Plan* (page 8). The Keeper acknowledges that the group appears to be made up of senior staff in the authority.

The Records Management group is responsible for developing policies relating to the *Plan*.

The Records Management Group is responsible for the review of the implementation of the *Plan* (**see element 13**).

The Group are responsible for linking vital records identified in the *Business Classification Scheme* with the recovery of critical systems explained in the *Business Continuity Plan* (**see element 10**).

The Group is responsible for monitoring changes in retention decisions (**see element 5**) and for advising on the allocation of retention decisions to records not already scheduled.

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.

### **Senior Managers**

Senior Managers in the authority act as ‘information asset owners’ (see *Records Retention and Disposal Policy* section 4.5).

## 6. Keeper's Summary

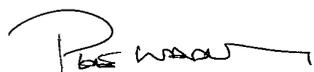
Elements **1 - 14** that the Keeper considers should be in a public authority records management plan have been properly considered by Lothian Valuation Joint Board. Policies and governance structures are in place to implement the actions required by the plan.

## 7. Keeper's Determination

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

- The Keeper recommends that Lothian 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 Lothian Valuation Joint Board. In agreeing this RMP, the Keeper expects Lothian 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