

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

### **The Moray Council Moray Licensing Board Assessment Report**

**The Keeper of the Records of Scotland**

**18 February 2014**

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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 Historic 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 Moray Council** and **Moray Licensing Board** by the Public Records (Scotland) Act 2011 Assessment Team following its submission to the Keeper on 22<sup>nd</sup> November 2013.

The assessment considered whether the RMP of **The Moray Council** and **Moray Licensing Board** was developed with proper regard to the 14 elements of the Keeper's statutory Model Records Management Plan (the Model Plan) under section 8(3) of the Act, and whether in this respect it complies with it and the specific requirements of the Act.

The outcome of the assessment and the Keeper's decision on whether the RMP of **The Moray Council** and **Moray Licensing Board** complies with the Act can be found under section 7 of this report with relevant recommendations.

### 3. Authority Background

Local government in Scotland comprises 32 unitary local authorities, responsible for the provision of a range of public services. The Moray Council is one of these authorities <http://www.moray.gov.uk/>. It provides services to the people of Moray, such as education, social care, waste management, cultural services and planning.

Licensing is the responsibility of Licensing Boards under powers contained in the Licensing (Scotland) Act 2005. Local Licensing Boards have wide discretion to determine appropriate licensing arrangements according to local needs and circumstances and their own legal advice. Each local government area must have a Licensing Board. Moray Licensing Board consists of 9 Board members.

### 4. Keeper's Assessment Process

The RMP was assessed by the Public Records (Scotland) Act Assessment Team on behalf of the Keeper. Assessors used the checklist elements listed in section 5, to establish whether **The Moray Council** and **Moray Licensing Board's** RMP was developed with proper regard to the elements of the Model Plan and is compliant with the Act. The assessment also considered whether there was sufficient supporting evidence of such compliance.

## 5. Model Plan Elements: Checklist

**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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**N. B. For simplicity, as the plan relates to the records management provision for both public authorities, the use of 'Moray Council' should be taken to refer to that organisation as well as the Moray Licensing Board.**

Element	Present	Evidence	Notes
1. Senior Officer <i>Compulsory element</i>	<b>G</b>	<b>G</b>	Mr Roderick Burns, Chief Executive of The Moray Council, has signed a covering letter, dated 7 <sup>th</sup> November 2013, approving the RMP document. Mr Burns' contact details are provided in the RMP.  In a separate covering letter, dated 23 October 2013, Rhona Gunn, Head of Legal & Democratic Services approves the plan on behalf of Moray Licensing Board. Section 3.0 of the plan specifically states that it refers to the licensing board as well as the

			<p>council.</p> <p>The Keeper acknowledges, therefore, that the licensing board are content that their submission has been combined with that of the council.</p> <p>He also agrees that appropriate people have been identified as having senior management responsibility for the records management plan.</p>
2. Records Manager <i>Compulsory element</i>	G	G	<p>The Moray Council Records Manager, Eleanor Rowe is identified in the plan as the individual responsible for the implementation of the plan.</p> <p>A detailed job description and person specification for the records manager post has been submitted in evidence. This document demonstrates the reporting structure. The Keeper notes that this job description does not refer specifically to the implementation of the Records Management Plan under PRSA and refers to NRS as 'NAS' (for example at 5.5.4). This document may need updating.</p> <p>Ms Rowe has responsibility for Data Protection, record destruction and for staff development, providing leadership on records management training.</p> <p>The Keeper agrees that an appropriate person has been identified to implement the RMP.</p>
3. Policy <i>Compulsory element</i>	G	G	<p>The Moray Council has a detailed <i>Records &amp; Information Management Policy</i> which has been provided. This policy, original approved by the Full Council in 2006 has been expanded to include information management and most recently approved by the Corporate Management Team in October 2013.</p> <p>The policy is publically available at:  <a href="http://www.moray.gov.uk/moray_standard/page_46084.html">http://www.moray.gov.uk/moray_standard/page_46084.html</a></p>

			<p>The <i>Records &amp; Information Management Policy</i> supports the council's Designing Better Services programme (see <i>Designing Better Services</i> under General Comment below). It correctly identifies records as 'a valuable and tangible asset' (introduction) and specifically mentions PRSA. Section 13 of the policy is particularly effective, setting out the benefits of records management as bullet points. The policy also includes Key Performance Indicators as section 14 and stresses staff training throughout, including a lack of training as a 'risk'.</p> <p>The introduction section of the RMP itself (1.0) also provides a good explanation of the importance of records as a business asset. Section 2.0 includes a definition of a 'record' for the purposes of The Moray Council's business.</p> <p>The policy applies to partner organisations and third party contractors (see element 4 below)</p> <p>Also, in evidence, the council has submitted their <i>Records Management Handbook</i> (version 1.0, 2013).</p> <p>The Keeper agrees that The Moray Council has an operational records management policy appropriate for their business, strongly supported by the introduction to the RMP itself.</p>
4. Business Classification	A	A	<p>The Moray Council has provided their EDRMS 'architecture' as a business classification. This is currently incomplete but the structure is robust and appears to take account of all the functions of The Moray Council and Licensing Board. The EDRM being implemented is SharePoint 2010. This is still in development, but The Moray Council shows real commitment to rolling this scheme out. The Keeper understands that 2016 is the current target date for completion of the DBS project, which is behind the introduction of the EDRMS.</p> <p>The use of the EDRM is explained in section 4.3 'Document Management' of the</p>

			<p>additional evidence and in section 3 of the <i>Records Management Handbook</i>.</p> <p>The council has adopted a functional scheme for their business classification. Although, this must remain a business decision for the council, the Keeper acknowledges that a functional arrangement (rather than following corporate hierarchy) is currently considered best practice. An explanation of why this is so is provided as part of the text of element 4 in the council RMP.</p> <p>The council has opted for the esd toolkit:  <a href="http://www.esd.org.uk/esdtoolkit/default.aspx">http://www.esd.org.uk/esdtoolkit/default.aspx</a> which is facilitated by the Local Government Association (LGA). The toolkit has been ‘tailored to the needs of the Council’.</p> <p>The council has a paper closed records store for the storage of paper records under retention. This is a separate issue from archiving in the heritage service (see element 7 below).</p> <p>Paper records are being phased out of the council records management system and there is a back-scanning project in place. However, the council correctly recognise that for legal reasons some paper records will be required to be retained. These are recorded in the BCS. For example when a ‘signed original record is required for legal purposes.’ Scanning is done ‘to legal evidential standards to ensure that electronic information is acceptable in court.’</p> <p>There is a recognition of the risk associated with mobile devices and an instruction for staff to check records back into the EDRM and then destroy the mobile version (Section 4.3 ‘Document Management’ of the additional Elements). There is a clear instruction in the <i>Records &amp; Information Management Policy</i> that the EDRMS will be the only acceptable record store - with a few exceptions, for professional (legal?) reasons.</p>
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			<p>The council has provided a document <i>Managing a Digital Information Migration Project</i>. This document is labelled 'draft' and therefore does not represent current operations in the council. However, the Keeper thanks the council for the submission and will read it with interest. The draft nature of this document does not affect the general agreement of this element.</p> <p>The procedure for the management of e-mails is set down in a guidance document <i>Guidance for the management of emails</i> which has been supplied to the Keeper as evidence.</p> <p>As with most local authorities, some functions of The Moray Council are provided by third parties. The council is clear about the 'ownership' of records created by third parties on the councils behalf, whether held on the third party's systems or not (for example see <i>Records Management Handbook</i> section 2) The contractual obligations placed on these third parties regarding records management are detailed in a guidance document <i>How To Build Your Set of Terms and Conditions from the Council Standard</i> (section 15). This document also covers data protection and FOI responsibilities and has been provided to the Keeper as evidence that The Moray Council has properly taken this important aspect of PRSA into consideration.</p> <p>Currently, the council uses other line-of business systems, such as IWord or Carefirst. <i>The Records &amp; Information Management Policy</i> (section 7.6) recognises that some legacy systems do not currently fit into the records management plan and have to be managed separately (see <i>Records Management Handbook</i> section 3). The admission of such a 'gap' is accepted by the Keeper.</p> <p><b>The Keeper agrees this element of The Moray Council RMP on 'improvement model' terms. This means that he is convinced of the council's commitment to implement the BCS fully over time, but would request that he is updated as</b></p>
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			<b>this project progresses.</b>
5. Retention schedule	G	G	<p>The Moray Council has provided the 2013 version of its retention and disposal schedule. The 'Procurement' function retention schedule (2011) appears separately and has also been provided.</p> <p>The retention schedule was developed in consultation with local service areas, not imposed centrally. For a large complex organisation the Keeper agrees that this is good practice.</p> <p>Moray Council's retention schedule was utilised in the development of the well regarded <i>Scottish Local Authority Retention Schedules</i>  <a href="http://www.scottisharchives.org.uk/projects/toolsstandards/retentionschedules/schedules">http://www.scottisharchives.org.uk/projects/toolsstandards/retentionschedules/schedules</a></p> <p>The current retention schedule is under review as part of the improvement plan (see element 4 above) There is a stated commitment, at 4.1 of the additional elements, that an electronic preservation strategy will be developed. The Keeper requests sight of that strategy when it is available.</p> <p>The Keeper agrees that The Moray Council has an operational retention schedule that covers all the functions of the authority.</p>
6. Destruction Arrangements <i>Compulsory element</i>	G	G	<p>The Moray Council has provided has provided a suite of guidance and policies relating to the secure irretrievable destruction of records.</p> <p>The submitted evidence includes the document <i>Identification of and Secure disposal of Confidential, personal, Sensitive and Commercially Sensitive Records</i> (which includes a flow chart), a destruction authorisation template as an example and a sample destruction certificate from a third party provider.</p>

			<p>Hardware is destroyed by the same third party provider.</p> <p>The procedure for the management of e-mails is set down in a guidance document <i>Guidance for the management of emails</i> which has been supplied to the Keeper as evidence.</p> <p>Electronic records held on the EDRMS system will be automatically deleted at the end of their retention period. This system is not yet fully in place but is part of an improvement plan that the council has committed to (see element 4 above)</p> <p>There is a recognition of the risk associated with mobile devices and an instruction for staff to check records back into the EDRM and then destroy the mobile version (Section 4.3 'Document Management' of the additional Elements).</p> <p>The importance of the destruction of back-up copies is mentioned in several places (for example the <i>Records &amp; Information Management Policy</i> section 8, <i>Identification &amp; Secure Disposal of Confidential..</i> section 1, and the <i>Records Management Handbook</i> section 18). The RMP clearly states that backed-up records remain on the ICT backup system for a further 3 months and are then routinely deleted.</p>
<p>7. Archiving and Transfer <i>Compulsory element</i></p>	<p>A</p>	<p>A</p>	<p>Moray Council transfer records to the Moray Local Heritage Centre for permanent preservation. The Council have provided a suite of archive policies (the Collecting Policy approved by NAS in 2008) as evidence that policies and procedures are in place to ensure this transfer is carried out in an appropriate manner.</p> <p>A small section of the records created by The Moray Council are deposited with Aberdeen City Archives.</p> <p>Arrangements to transfer records from the EDRMS to the archive are not yet fully in place. The council has provided a document <i>Managing a Digital Information</i></p>

			<p><i>Migration Project.</i> <b>This document is labelled ‘draft’ and therefore does not represent current operations in the council.</b> However, the Keeper thanks the council for sight of this document and confirms that it does not affect the general agreement of this element.</p> <p>In their RMP at element 7, the Council mentions that it has a paper closed records store. This is a separate issue from archiving in the heritage service.</p> <p>For the purposes of the Public Records (Scotland) Act 2011 (PRSA), the Keeper agrees that The Moray Council have <b>arrangements</b> in place to ensure the transfer of records of enduring value to a place of deposit for permanent preservation.</p> <p>However, in January 2010 the Keeper advised that the physical condition of The Moray Council Archive store was suitable only as a temporary solution. It is understood that the archive provision has not changed in the intervening period. The Keeper is aware that, in recognition of this gap in provision, The Moray Council has commissioned a NPO survey based on standards set by the British Library Preservation Advisory Centre. The Keeper has been provided with a draft version of this report, although this was done outwith the Council’s formal PRSA submission. In its conclusion the report states “The archive collection held by the Moray Council is well cared for with many of the collection care policies and activities that allow a collection to remain stable in place. With the continuation of improvements to secondary protection the vast majority of the material will continue to be stable and accessible. ”</p> <p>Ministers built flexibility into the PRSA to ensure no authority would be subject to unreasonable burdens in achieving the Keeper’s agreement for their RMP. While there are therefore compulsory elements that each authority must meet in full, others can be achieved by continuous improvement. Under the PRSA it is for the Keeper to determine what constitutes ‘proper arrangements’ in relation to an</p>
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			<p>authority's records management provision, including its archive facility. It is the case that The Moray Council's RMP meets its statutory obligations in relation to element 7 - Archiving and Transfer Arrangements – by having in place robust policies and procedures for the transfer of records of enduring value to a place of permanent deposit.</p> <p>Subsequent to the Keeper's recommendation in 2010 that Moray's archive was suitable only as a temporary solution the Council actively considered improvements to its archive facility. It appears, however, that the facility remains without any significant upgrade and current proposals to provide improved archive premises are in serious danger of not being progressed at this time.</p> <p>The Keeper's agreement under this element of the RMP must therefore be <u>conditional</u> on the acceptance of his recommendations to ensure that The Moray Council's archive provision is subject to measurable continuous improvement.</p> <p><b>The Keeper will agree this element subject to:</b></p> <p><b>(a) The final version of the NPO report being provided when available. This should be done as an update to The Moray Council's PRSA submission. The Keeper expects the Moray Council will consider, and where possible act upon, the findings of this report.</b></p> <p><b>(b) The Keeper and The Moray Council are to engage, separately from the PRSA process, to make arrangements for an on-site review of the council's archive provision. This review would be carried out by specialist staff from the Keeper's Records and Archives Division at a mutually suitable time.</b></p>
8. Information			Moray Council has supplied the Keeper with its ICT Information Security Policy

<p>Security <i>Compulsory element</i></p>	<p>G</p>	<p>G</p>	<p>(2009) and a strong EDRMS access policy. Security of paper records, including a clear-desk policy is included in the Records Management handbook.</p> <p>The council operates an Information Security Group. The representatives that sit on this group are detailed in the RMP.</p> <p>Paper records, and hardware, are destroyed by a contracted third party (see element 6 above). The council are considering, according to the <i>Records &amp; Information Management Policy</i>, the introduction of security markings.</p> <p>The security of the scanning process is covered by the <i>Records &amp; Information Management Policy</i> (section 7.2)</p> <p>A 'Think Privacy' poster to be displayed in staff areas has also been supplied. The Keeper commends this as a valuable awareness-raising exercise.</p> <p>There is a section on encryption of mobile devices in the RMP (4.3 'Document Management' of the additional Elements).</p> <p>The procedure for the management of e-mails is set down in a guidance document <i>Guidance for the management of emails</i> which has been supplied to the Keeper as evidence. This excellent guidance document details the risks of using e-mail to communicate sensitive information.</p> <p>A training module specifically for Information Security is in development. The Keeper would be pleased to see this when completed.</p> <p>The Keeper agrees that The Moray Council properly considers information security.</p>
<p>9. Data</p>			<p>The Moray Council provides its service users with information on data protection,</p>

Protection	G	G	<p>including guidance, the council's privacy notice and subject access procedures on their website at:  <a href="http://www.moray.gov.uk/moray_standard/page_41179.html">http://www.moray.gov.uk/moray_standard/page_41179.html</a>                  This includes the rights of members of the public, as users of Council services, to see their own personal information and 'be provided with information about the uses to which it is put'.</p> <p>The council's data protection guidelines, data breach procedures and subject access guidelines (as used by council staff) have been provided to the Keeper.</p> <p>The <i>Records &amp; Information Management Policy</i> recognises the risk involved with keeping information longer than necessary. This policy document also instructs that Privacy Impact Assessments should be undertaken when new electronic systems are introduced.</p> <p>The slides of a PowerPoint Presentation <i>Access to Information Training</i> have been provided as evidence that council staff are properly trained regarding their responsibilities under data protection legislation. The records manager has responsibility for data protection and staff training in this area.</p> <p>A 'Think Privacy' poster to be displayed in staff areas has also been supplied. The Keeper commends this as a valuable awareness-raising exercise.</p> <p>The Moray Council is registered with the Information Commissioner and their registration number has been provided. It does not appear that the Licensing Board is separately registered.</p> <p>The Keeper agrees that The Moray Council has properly considered its responsibilities under the Data Protection Act 1998.</p>
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<p>10. Business Continuity and Vital Records</p>			<p>Moray Council's business continuity and emergency planning statements is publically published at: <a href="http://www.moray.gov.uk/moray_standard/page_57166.html">http://www.moray.gov.uk/moray_standard/page_57166.html</a> and <a href="http://www.moray.gov.uk/moray_standard/page_75665.html">http://www.moray.gov.uk/moray_standard/page_75665.html</a> respectively.</p> <p>The council has appointed a business continuity officer, who sits under the Directorate of Environmental Services.</p> <p>The Moray Council carried out a business impact analysis to inform their Business Continuity plan.</p> <p>Services have been asked to identify critical (vital) records. The Keeper commends the principle that this is best done locally. The Keeper understands that this information should be incorporated in the BCS, but this has not yet been done (see element 4 above).</p> <p>The Keeper agrees that The Moray Council has properly considered business continuity and vital records.</p>
<p>11. Audit trail</p>	<p>A</p>	<p>A</p>	<p>SharePoint 2010 imposes naming conventions and version control. A <i>Guidelines for Naming Conventions &amp; Version Control</i> staff document has been provided as evidence. The EDRMS, when fully rolled out, will audit the modification of records. As the council appears to have committed to this roll out the issue of audit trail can be agreed on an Improvement Model.</p> <p>Paper files are accounted for in the EDRMS and screen shots have been provided referring to the tracking of current and closed paper files as evidence.</p> <p>Version control is covered in additional evidence 4.1 'Digital Continuity' and 4.3</p>

			<p>'Document Management' with a recommendation that final versions are saved in pdf or pdf-a (<a href="http://www.pdf-archive.com">http://www.pdf-archive.com</a>) format. This policy will be combined with an electronic preservation strategy (see element 5 above) to 'prevent future modification or deletion by users'.</p> <p>The importance of saving e-mail 'records' to the corporate file plan is stressed in 4.3 of the additional elements in the RMP.</p> <p>The council has provided a document <i>Managing a Digital Information Migration Project</i>. This document is labelled 'draft' and therefore does not represent current operations in the council. However, the Keeper thanks the council for the submission and will read it with interest. The draft nature of the document does not affect the general agreement of this element.</p> <p><b>The Keeper agrees this element of The Moray Council RMP on 'improvement model' terms. This means that he is convinced of the council's commitment to implement audit trails fully over time, but would like to request that he is updated as this project progresses.</b></p>
<p>12. Competency Framework for records management staff</p>	<p>G</p>	<p>G</p>	<p>The competencies required for the records manager post (see Element 2) are provided in a detailed job description and person specification.</p> <p>The slides of a PowerPoint Presentation <i>Access to Information Training</i> have been provided as evidence that council staff are properly trained regarding their responsibilities under data protection legislation. The records manager has responsibility for data protection and staff training in this area.</p> <p>Training of staff is allocated a separate section of the <i>Records &amp; Information Management Policy</i> (October 2013 version section 12.0) and the Handbook (v1.0 section 22).</p>

			<p>A training module specifically for Records Management is in development. The Keeper would be pleased to see this when completed.</p> <p>Many of the documents which form the information management library are available on the intranet for staff. All documents have been grouped into one area: Reference/ Records Management. Moray Council has included a screen shot of how this appears as part of their evidence package.</p> <p>The Keeper agrees that the person identified at element two has appropriate skills to implement the RMP and that The Moray Council properly consider records management training for their staff.</p>
<p>13. Assessment and Review</p>	<p>G</p>	<p>G</p>	<p>The Moray Council has an internal audit service and they commit to auditing 'one or two elements of the plan each year'. This RM audit has been built into the service's work plan.</p> <p>Retention and Disposal schedules will be reviewed on an ongoing basis (<i>Retention &amp; Disposal Schedule for Documents and Records</i> section 1.9)</p> <p>The Records &amp; Information Management Policy, but not the RMP, mentions the ARMS improvement framework. It is not thought that The Moray Council have used that framework as yet.</p> <p>The Keeper agrees that The Moray Council has put an assessment mechanism in place.</p>
<p>14. Shared Information</p>	<p>G</p>	<p>G</p>	<p>The Moray Council has supplied its <i>Data Sharing Code of Practice</i> as evidence as well as staff guidance from the Grampian Data Sharing Partnership:  <a href="http://www.moray.gov.uk/downloads/file64267.pdf">http://www.moray.gov.uk/downloads/file64267.pdf</a></p>

			<p>The council has also supplied a link to a protocol as a sample: Anti Social information sharing protocol is available on the council website:- <a href="http://www.moray.gov.uk/moray_standard/page_45649.html">http://www.moray.gov.uk/moray_standard/page_45649.html</a></p> <p>The RMP states that the Licensing Board has a responsibility to <u>consult</u> with third parties in respect of applications (police etc.). This involves sharing information and is carried out under the council's code of practice.</p> <p>On the basis of the supplied code of practice, guidance and publically available protocol, The Keeper agrees that The Moray Council properly considers records governance when undertaking data sharing projects.</p>
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### **General Notes on RMP**

The Moray Council RMP has been approved by Roderick Burns, Chief Executive and by Rhona Gunn, Head of Legal & Democratic Services and Clerk to the Licensing Board.

The council undertakes to work towards the standards laid out in ISO15489 - *Information and documentation -- Records management*.

The RMP has been created with the input of many different service areas in the council.

The council has set up a Records Management Liaison Group. Their remit specifically mentioning PRSA has been supplied to the Keeper. The Keeper commends the idea, in a large public authority, of setting up local records management 'champions' in service areas.

The RMP includes additional elements appropriate to the size and complexity of a local authority. The Keeper welcomes these additions as they strengthen the RMP as a business tool and help to tailor the RMP to the needs of The Moray Council. The Keeper also especially commends the guidance on email management (Appendix 46).

*Third Party Contractors:* The RMP (section 3.0) refers to its application in the case that the council enters into partnership or contractual arrangements. The issue of third party contractors carrying out council functions is mentioned repeatedly (for example in Element 14, last paragraph of text or *Records Management Handbook* section 2). Overall, it seems that The Moray Council has correctly identified the importance of passing on records management responsibilities when drafting contracts with these third parties (see Element 4 above).

*Designing Better Services:* The Moray Council records management procedures are part of an ongoing council programme entitled 'Designing Better Services'. This programme, focusing on standardisation, simplification and sharing, is designed to promote service improvement and to 'release financial efficiencies'. See <http://www.moray.gov.uk/minutes/data/MC20081105/Item%207.pdf> for example.

## 6. Keeper's Summary

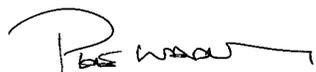
Elements 1 - 14 that the Keeper considers should be in a public authority records management plan have been properly considered by **The Moray Council** and **Moray Licensing Board**. Policies and governance structures are in place to implement the actions required by the plan.

## 7. Keeper's Determination

Based on the assessment process detailed above, the Keeper **agrees** the RMP of **The Moray Council** and **Moray Licensing Board**.

- The Keeper recommends that **The Moray Council** and **Moray Licensing Board** should publish its agreed RMP as an example of good practice within the authority and the sector.

This report follows the Keeper's assessment carried out by,



.....  
**Pete Wadley**  
Public Records Officer



.....  
**Robert Fotheringham**  
Public Records Officer

## 8. Endorsement of Report by the Keeper of the Records of Scotland

The report has been examined and is endorsed under the signature of the Keeper of the Records of Scotland as proof of compliance under section 1 of the Public Records (Scotland) Act 2011, and confirms formal agreement by the Keeper of the RMP as submitted by **The Moray Council** and **Moray Licensing Board**. In agreeing this RMP, the Keeper expects **The Moray Council** and **Moray Licensing Board** to fully implement the agreed RMP and meet its obligations under the Act.



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