

**Public Records (Scotland) Act 2011**

**Renfrewshire Valuation Joint Board  
Assessment Report**

**The Keeper of the Records of Scotland**

**13<sup>th</sup> January 2016**

**Contents**

1. Public Records (Scotland) Act 2011 ..... 3  
2. Executive Summary ..... 4  
3. Authority Background ..... 4  
4. Assessment Process ..... 5  
5. Model Plan Elements: Checklist ..... 6  
6. Keeper's Summary .....20  
7. Keeper's Determination .....20  
8. Keeper's Endorsement .....21

## 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 **Renfrewshire Valuation Joint Board** by the Public Records (Scotland) Act 2011 Assessment Team following its submission to the Keeper on **20<sup>th</sup> October 2015**.

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

## 3. Authority Background

Renfrewshire Valuation Joint Board was established by the Valuation Joint Boards (Scotland) Order 1995 to carry out the valuation functions of Renfrewshire, East Renfrewshire and Inverclyde Councils.

It came into existence on 1 April 1996 and was also given the responsibility of carrying out Electoral Registration on behalf of the three constituent authorities.

The composition of the membership of the Board is determined by the above Order and consists of 8 Councillors representing Renfrewshire Council and 4 each representing East Renfrewshire and Inverclyde Councils.

<http://www.renfrewshire-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 Renfrewshire 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.
----------	--	--	----------	--	--	----------	--

## 5. Model Plan Elements: Checklist

### Renfrewshire Valuation Joint Board (for simplicity this authority is referred to as 'the Board' in the assessment below)

Element	Present	Evidence	Notes
1. Senior Officer <i>Compulsory element</i>	<b>G</b>	<b>G</b>	<p>Renfrewshire Valuation Joint Board (the Board) have identified, Alasdair MacTaggart, Assessor &amp; Electoral Registration Officer, as the individual with overall responsibility for records management in the authority.</p> <p>This is confirmed by the Board's <i>Records Management Policy</i> (section 6).</p> <p>The Keeper agrees that Renfrewshire Valuation Joint Board have identified an appropriate individual in this role as required by the Public Records (Scotland) Act 2011 (the Act).</p>
2. Records Manager <i>Compulsory element</i>	<b>G</b>	<b>G</b>	<p>The Board have identified, Shona Carlton, Principle Administrative Officer, as the individual with day-to-day responsibility for implementing the <i>Records Management Plan</i> (the <i>Plan</i>).</p> <p>The Board does not have a full-time dedicated records manager. The Keeper agrees that this is appropriate for a public body of the size and complexity of the Board.</p> <p>Ms. Carlton is responsible for reviewing the <i>Plan</i> (<b>see element 13</b>), the <i>Records Management Policy</i> (<b>see element 3</b>), the suite of information security policies (<b>see element 8</b>), the <i>Archiving Policy and Transfer Arrangements</i> (<b>see element 7</b>), the</p>

			<p><b>Backup and Restore Policy (see element 10) and the Data Protection Policy (see element 9).</b></p> <p>The Principle Administrative Officer is the Chair of the Internal Governance Working Group <b>(see under general comments below)</b>. As such she is “responsible for ensuring that records management practices and procedures are established in line with all legal obligations and professional standards...” (<i>Policy</i> section 6.7)</p> <p>The above indicates that Ms. Carlton has a detailed knowledge of records management provision in the authority.</p> <p>The Keeper agrees that Renfrewshire Valuation Joint Board have identified an appropriate individual in 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>Renfrewshire Valuation Joint Board have a <i>Records Management Policy</i> (RVJB.RM.01) that has been provided to the Keeper. This policy was approved by the Management Team in June 2015. It is made available to staff on the Intranet. Furthermore, it is made available to the public on-line: <a href="http://www.renfrewshire-vjb.gov.uk/page20.html">http://www.renfrewshire-vjb.gov.uk/page20.html</a></p> <p>The Keeper commends this publication.</p> <p>The Keeper agrees that the objectives of the <i>Policy</i> are supported by the <i>Plan</i>.</p> <p>The Board make the following statement: “It is the aim of Renfrewshire Valuation Joint Board to achieve efficiency benefits through best practice applied to records management.” (<i>Plan</i> page 7, <i>Policy</i> page 3)</p> <p>The <i>Policy</i> refers to the Public Records Scotland Act (<i>Policy</i> section 2) and explains the value of records to the business (section 3) and robust records management (section 4).</p>

			<p>The Keeper agrees that Renfrewshire Valuation Joint Board 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>Renfrewshire Valuation Joint Board's <i>Records Management Policy</i> (<b>see element 3 above</b>) commits to ensure that “all information received or created is stored in the appropriate way and is easily retrievable” and commits to “The development of a business classification scheme to reflect the functions, activities and transactions of RVJB.”</p> <p>To this end the Board operate a <i>Business Classification Scheme</i> which has been supplied to the Keeper (version: July 2015). This shows all the functions, activities and transactions of the Board. For example: Corporate/Office Management/Travel &amp; Subsistence Claims.</p> <p>The Board operate a hybrid system with records held in both electronic and hard-copy format.</p> <p>The Board has chosen to structure its <i>Business Classification Scheme</i> on a functional model. This must remain a business decision for the Board, but the Keeper acknowledges that a functional scheme is currently considered best practice.</p> <p>The <i>Business Classification Scheme</i> and the <i>Retention Schedule</i> are separate documents (<b>see element 5</b>).</p> <p>The Keeper agrees that Renfrewshire Valuation Joint Board has a business classification scheme that includes all the functions of the authority.</p>



<p>5. Retention schedule</p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>Renfrewshire Valuation Joint Board has a Retention Schedule which has been provided to the Keeper. This is V1 dated July 2015. It is available on the Boards public website at:  <a href="http://www.renfrewshire-vjb.gov.uk/page53.html">http://www.renfrewshire-vjb.gov.uk/page53.html</a></p> <p>The Board's <i>Records Management Policy</i> under section 5 gives a commitment to maintain reliable and useable records through “the review and consolidation of the retention and disposal schedule to provide clear guidance regarding the management of RVJB records.”</p> <p>The Keeper agrees that Renfrewshire Valuation Joint Board has an approved and operational retention schedule that covers the record types explained in their <i>Business Classification Scheme</i>.</p>
<p>6. Destruction Arrangements <i>Compulsory element</i></p>	<p><b>A</b></p>	<p><b>G</b></p>	<p>Renfrewshire Valuation Joint Board's <i>Records Management Policy</i> (<b>see element 3 above</b>) commits to ensure that “all information is retained, destroyed or preserved in accordance with the Board’s retention and disposal arrangements”</p> <p>To this end the Board has procedures in place to irretrievably and securely destroy:</p> <p>Paper: The Board destroys hard-copy records utilising the services of a third-party contractor. Confidential waste is shredded on-site. A customer service agreement has been provided to the Keeper as evidence that this arrangement is operational.</p> <p>Electronic: The Board has provided the Keeper with their <i>Protective Marking Handling Disposal Policy &amp; Procedures</i>, approved by the Management Team in June 2014. This document explains the necessity for the irretrievable and secure destruction of records (dependant on their sensitivity) under 'Disposal' and under</p>

			<p>Appendix C. This <i>Policy</i> applies to “both paper and electronic media” (Policy ‘purpose’). <b>However, the process by which this destruction is to be carried out in the case of electronic records will form part of another policy that is not yet rolled out. The Keeper requests that this policy is forwarded to him as soon as it is available in order that he may keep the Board’s submission up-to-date.</b></p> <p>The Board also states: Further consideration is being given to the possibility of an automated deletion of records being incorporated into the Board’s IT system. This must remain a business decision for the Board. <b>The Keeper would be interested to know whether a new system would prompt the ‘information asset owner’ to initiate destruction or would simply carry out deletion automatically.</b></p> <p>Hardware: The Board have provided the Keeper with their <i>Disposal of Media</i> document, approved by the Management Team in June 2014. This provides an explanation (repeated in detail on page 11 of the <i>Plan</i>) of the arrangements in place to ensure that electronic media is suitably cleansed of records when being dispensed with, whether for destruction or reuse elsewhere.</p> <p>Back-ups: The Board, quite properly, keep a back-up of electronic records for business continuity purposes. An explanation of the system including when records are deleted from back-up has been provided in the <i>Plan</i> (page 17).</p> <p>The <i>Records Management Policy</i> – section 5.1 commits the Board to “The review and consolidation of destruction arrangements to detail the correct procedures to follow when disposing of business information”.</p> <p>The Keeper agrees that Renfrewshire Valuation Joint Board has procedures in place to suitably destroy paper records, hardware and back-ups when appropriate, as required by the Act. <b>He agrees this element of the Plan on ‘Improvement Model’ terms on the condition that the Board pursues the creation of a policy</b></p>
--	--	--	---

			<p><b>detailing the management (including deletion) of electronic records as committed to on page 12 of the <i>Plan</i>.</b></p>
<p>7. Archiving and Transfer <i>Compulsory element</i></p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>Renfrewshire Valuation Joint Board's <i>Records Management Policy</i> (see element 3 above) commits to ensure that "all information is retained, destroyed or preserved in accordance with the Board's retention and disposal arrangements"</p> <p>Divisional Assessors and Assistant EROs are responsible for "transferring any records of historical value to an archive for permanent preservation" (<i>Records Management Policy</i> section 6.4)</p> <p>The <i>Plan</i> states that copies of Board minutes are archived on the website of Renfrewshire Council:  <a href="http://www.renfrewshire.gov.uk/webcontent/home/services/council+and+government/council+information%2C+performance+and+statistics/ce-jl-joint-boards-agendas-minutes">http://www.renfrewshire.gov.uk/webcontent/home/services/council+and+government/council+information%2C+performance+and+statistics/ce-jl-joint-boards-agendas-minutes</a></p> <p>Renfrewshire Council also provide archiving facilities for these records as explained in the <i>Plan</i> (page 13): Renfrewshire Council hold signed copies of all Renfrewshire Valuation Joint Board Minutes. After each Board meeting the Convener/Depute Convener sign the previous minute after approval . The signed minutes are then incorporated into leather bound editions and held in the Central Library archive.</p> <p>The Board have provided the Keeper with an e-mail from Renfrewshire Council's Committee Services Officer confirming that this arrangement is operational. The Keeper agrees that the Board have identified a suitable archive repository for the permanent retention of certain records and that arrangements are in place to transfer those records to the repository.</p>

<p>8. Information Security <i>Compulsory element</i></p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>Renfrewshire Valuation Joint Board have an <i>Information Security Policy</i> (SP1.01) that has been provided to the Keeper. The <i>Policy</i> was approved by the Management Team in June 2014 and was reviewed in August 2015.</p> <p>The <i>Policy</i> is supported by a suite of security policies and guidance. For example the <i>Security Incident and Weakness Policy</i> (SP1.04) which “ensures that Information security incidents or weaknesses are identified, reported and acted upon.” and an <i>Access Control Policy</i> (IT.02).</p> <p>The Board have provided a screen shot in evidence showing how this, and other, policies are accessed by staff.</p> <p>The <i>Plan</i> (page 14) gives a good explanation of the purposes of information security.</p> <p>The <i>Records Management Policy</i> (<b>see element 3</b>) commits the Board to “protect records and systems from unauthorised access, use, disclosure, disruption, modification, or destruction.” (section 5.1).</p> <p>All staff have undertaken information security training (<i>Plan</i> page 14). This included protective marking training. Data protection training was provided for staff in September 2015.</p> <p>The Keeper agrees that Renfrewshire Valuation Joint Board have procedures in place that properly consider the security of records within the authority as required by the Act.</p>
<p>9. Data Protection</p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>The Plan states (page 16) “RVJB fully endorses and adheres to the Principles of Data Protection as detailed in the Act...”</p>

			<p>Renfrewshire Valuation Joint Board have a <i>Data Protection Policy</i> that has been provided to the Keeper. The <i>Policy</i> was approved by the Management Team in July 2015.</p> <p>The Board is registered with the Information Commissioner (Z6615939).</p> <p>The Data Protection Act is specifically mentioned as a legal requirement in the <i>Plan</i> (page 7) and the <i>Policy</i> (<b>see element 3</b>) section 7.1.</p> <p>Data protection training was provided for staff in September 2015.</p> <p>The Board operates a suite of information security policies and guidance including <i>Security of IT Systems – Guidance to Staff</i> much of the content of these documents is directly relevant to data protection issues (<b>see element 8</b>).</p> <p>The <i>Records Management Policy</i> refers to the Board’s compliance with the Data Protection Act 1998 (<i>Policy</i> section 2). It also states a commitment – section 5.1 – to ensure “The review and consolidation of data protection policies in order to demonstrate RVJB’s commitment to compliance with Act...”</p> <p>The Keeper agrees that Renfrewshire Valuation Joint Board recognise their responsibilities under the Data Protection Act 1998.</p>
<p>10. Business Continuity and Vital Records</p>	<p><b>A</b></p>	<p><b>G</b></p>	<p>Renfrewshire Valuation Joint Board’s <i>Records Management Policy</i> (<b>see element 3</b>) makes a commitment to maintain reliable and useable records by effective records management procedures including “The continuing review of our business continuity arrangements, encompassing strategies to ensure that vital records held by RVJB remain accessible.</p> <p>However, the Board has yet to adopt a formal <i>Business Continuity Plan</i> which at the</p>

			<p>time of this assessment is described as “currently being finalised by the Internal Governance Working Group” <b>(see under General Comments below)</b>. This statement is confirmed by the IGWG remit (provided separately).</p> <p>The Board operates back-up of records for business continuity purposes <b>(see element 6 – destruction of back-ups)</b> and have a call-out plan in case of emergencies. This was provided to the Keeper as part of the initial submission. The Keeper would like to assure the Board that all documents submitted in evidence are held securely by NRS and access is strictly limited to the PRSA Assessment Team, the Head of Government Records and himself.</p> <p>A separate <i>IT Disaster Recovery Plan</i> has also been created and, at time of assessment, awaits final sign-off.</p> <p><b>The Keeper agrees this element of the Renfrewshire Valuation Joint Board’s records management plan under ‘improvement model’ terms. This means that he recognises that an authority has acknowledged a gap in provision (two vital business continuity policy documents have not yet been approved) but have put processes in place to close that gap. The Keeper’s agreement is conditional of him being provided with fully authorised policy documents as soon as they are available.</b></p>
11. Audit trail	<b>A</b>	<b>G</b>	<p>Renfrewshire Valuation Joint Board’s <i>Records Management Policy</i> <b>(see element 3 above)</b> commits to ensure that “all information received or created is stored in the appropriate way and is easily retrievable”</p> <p>Further, it states a commitment that information should be “easily accessible to users”. (both statements <i>Policy</i> page 3 repeated at <i>Plan</i> page 7).</p> <p>The <i>Plan</i> states (page 8) that an audit trail for electronic records is automatically</p>

			<p>created.</p> <p>Evidence has been supplied that this objective is achieved as far as records held electronically. However, the Board operates a Hybrid electronic/paper system. The <i>Plan</i> states (page 18): “For paper files a simple logging out sheet requires to be implemented for those paper property records and this will be added to the Internal Governance Working Group’s remit” <b>(see under General Comments below)</b>.</p> <p><b>The Keeper agrees this element of Renfrewshire Valuation Joint Board’s records management plan under ‘improvement model’ terms. This means that the authority has acknowledged a gap in provision (movement of paper records is inadequately tracked) and has made a commitment to implement a process that will close that gap. The Keeper’s agreement is conditional on his being updated as this project progresses.</b></p>
<p>12. Competency Framework for records management staff</p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>Ms. Carlton’s Job Profile (provided) states that the Board will support her records management role with appropriate training as required (plan page 19). She has attended an in-house (Renfrewshire Council) information governance training course.</p> <p>The <i>Records Management Policy</i> <b>(see element 3)</b> commits the Board to “The identification of records management as a distinct stream within the Board’s training aims, with requisite training provided to all staff.” (<i>Policy</i> section 5.1 supported by section 9.1).</p> <p>The Board operate a bi-monthly review of training provision for staff. Information governance training is included in these reviews (<i>Plan</i> page 14).</p> <p>All staff have undertaken information security training (<i>Plan</i> page 14). This included protective marking training. Data protection training was provided for staff in</p>

			<p>September 2015.</p> <p>There is a recognition in the <i>Plan</i> (page 10) that staff need further training on the operation of the retention schedule. There is a commitment to providing staff with a “clear set of rules”. <b>The Keeper requests a copy of these rules when they become available.</b></p> <p>The Board have supplied the Keeper with a template information governance training certificate in evidence that such training exists within Renfrewshire Council.</p> <p>The Keeper agrees that the individual identified at element 2 above has the appropriate responsibility, skills and training opportunities to fulfil the role and that the Board have properly considered information governance training for their staff.</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 (page 3) “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 review date of October 2016. This review is the responsibility of the Principle Administrative Officer (<b>see element 2</b>) in her role as Chair of the IGWG (<b>see under General Comments below</b>). This is confirmed in Ms Carlton’s annual objectives (<b>however see element 12 above</b>).</p> <p>The first review date is confirmed in the introduction to the <i>Plan</i> (page 3) there is</p>



			<p>also a commitment to review the <i>Plan</i> regularly thereafter (page 4 and page 7). There is a commitment in the <i>Plan</i> (page 20) to request an annual review by Renfrewshire Council’s Internal Audit. It seems likely that Internal Audit will review the <i>Plan</i> in sections. This seems appropriate. An e-mail from Internal Audit has been supplied in evidence of this arrangement.</p> <p>The <i>Plan</i> (page 20) features a table showing the governance structure responsible. This shows that the Internal Governance Working Group reports to the Senior Management team quarterly.</p> <p>There is a commitment, against several elements of the <i>Plan</i>, to regularly review policies. For example: The <i>Records Management Policy</i> (<b>see element 3</b>) will be reviewed by June 2016 (<i>Policy</i> section 10). This regular review is confirmed in the <i>Plan</i> (page 8).</p> <p>The <i>Plan</i> states that the <i>Business Classification Scheme</i> and the <i>Retention Schedule</i> will be under ‘constant review’ during the implementation process.</p> <p>The Keeper agrees that Renfrewshire Valuation Joint Board have processes in place to review their <i>Plan</i> as required by the Act.</p>
<p>14. Shared Information</p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>Renfrewshire Valuation Joint Board routinely share information with the three local authorities that constitute the area of responsibility of the joint board.</p> <p>They do this under terms laid out in user agreements.</p> <p>The user agreement between the Joint Board and Renfrewshire Council has been provided as a sample. The Keeper accepts that similar documents exist relating to information sharing with the other councils. The Keeper agrees that the user agreement includes clauses relating to information governance.</p>

			The Keeper agrees that Renfrewshire Valuation Joint Board properly considers information governance when implementing information sharing processes with third parties.
--	--	--	---

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

**Version**

This assessment was carried out on the Records Management Plan of Renfrewshire Valuation Joint Board version 8.

This version was approved by the Management Team in October 2015. It was created by Kate Crawford, Depute Assessor. It will be reviewed by Shona Carlton, Principle Administrative Officer, by October 2016 (**see elements 2 and 13**).

The introduction to the *Plan* explains the benefits of robust records management (page 3).

The Board recognises records as a corporate asset (for example *Plan* page 8, page 14, page 16 *Policy* page 4). The Keeper welcomes this recognition.

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

**Third Parties**

The 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)).

The Board have provided the Keeper with contractual clauses that they may use should third parties be required to carry out any of the Board's functions (Plan section 4). However, the *Plan* states (page 22) "At the present time no functions of Renfrewshire Valuation Joint Board are carried out by a Third Party".

### **Internal Governance Working Group (IGWG)**

Renfrewshire Valuation Joint Board state: "Following on from the creation of our RMP the Officer who deals with FOI [the Principle Administrative Officer] has been deemed to be the most suitable person to also be given the task of the operational manager for records management within this organisation. It has also been decided that this officer would be the most relevant person to be the Chair of our internal Governance Working Group." The remit for this group has been provided to the Keeper.

The work of the IGWG includes:

Reviewing the *Plan* (the individual responsible is the Principle Administrative Officer – **see element 2** - who, as described above, is Chair of the IGWG. This is part of Ms Carlton's annual objectives.

Identifying the destruction, retention and archiving of electronic records.

Finalising the *Business Continuity Plan*.

Creating a log-out sheet for tracking paper records.

Monitoring "any records management issues or concerns" (*Policy* section 6.4)

Reporting to the Senior Management Team on a quarterly basis.

Ensuring compliance with the *Records Management Policy*.

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

## **6. Keeper's Summary**

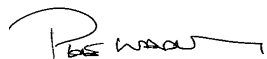
Elements 1 - 14 that the Keeper considers should be in a public authority records management plan have been properly considered by Renfrewshire Valuation Joint Board. Policies and governance structures are in place to implement the actions required by the plan.

## 7. Keeper's Determination

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

- The Keeper recommends that Renfrewshire 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 Renfrewshire Valuation Joint Board In agreeing this RMP, the Keeper expects Renfrewshire Valuation Joint Board to fully implement the agreed RMP and meet its obligations under the Act.



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