

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

### **Scottish Ambulance Service Assessment Report**

**The Keeper of the Records of Scotland**

**12<sup>th</sup> November 2015**

**Contents**

1. Public Records (Scotland) Act 2011 ..... 3  
2. Executive Summary ..... 4  
3. Authority Background ..... 4  
4. Assessment Process ..... 6  
5. Model Plan Elements: Checklist ..... 7  
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 the **Scottish Ambulance Service** by the Public Records (Scotland) Act 2011 Assessment Team following its submission to the Keeper on 26<sup>th</sup> June 2015.

The assessment considered whether the RMP of the Scottish Ambulance Service 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 Scottish Ambulance Service complies with the Act can be found under section 7 of this report with relevant recommendations.

## 3. Authority Background

The Scottish Ambulance Service is a national organisation providing a service in five Regional Operational Divisions:

- North Division – covering the Highlands, Grampian, the Western and Northern Isles
- East Central Division – covering Tayside, Forth Valley and Fife
- South East Division – covering Lothian and the Borders
- West Central Division – covering Lanarkshire, Greater Glasgow and Dunbartonshire
- South West Division - covering Ayrshire & Arran, Argyll & Clyde, Dumfries and Galloway

Operations are co-ordinated through three Ambulance Control Centres. These centres dispatch responses to 999 calls, arrange patient transport services to hospitals as requested by other medical professionals and manage air ambulance response. The Air Ambulance operates from Inverness, Aberdeen and Glasgow and operates across the country with two fixed wing aircraft and two helicopters.

The Scottish Ambulance Service National Headquarters is in Edinburgh. Executive directors are based there, along with other administrative functions such as finance, personnel and corporate affairs. Training and development services are run from the Scottish Ambulance Academy at Glasgow Caledonian University.

A board is responsible for ensuring that the Scottish Ambulance Service meets all of its obligations to patients and staff.

The Board is made up of:

- a non-executive chairman
- the chief executive
- eight non-executive directors including an employee director
- five executive directors

The chairman and non-executive directors are appointed by the Scottish Government through the Commissioner for Public Appointments. The chief executive and other executive directors are appointed through a process of public advertising and formal interview.

<http://www.scottishambulance.com/>

## 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 Scottish Ambulance Service's RMP was developed with proper regard to the elements of the Model Plan and is compliant with the Act. The assessment also considered whether there was sufficient supporting evidence of such compliance.

### Key:

<b>G</b>	The Keeper agrees this element of an authority's plan.		<b>A</b>	The Keeper agrees this element of an authority's plan as an 'improvement model'. This means that he is convinced of the authority's commitment to closing a gap in provision. He will request that he is updated as work on this element progresses.		<b>R</b>	There is a serious gap in provision for this element with no clear explanation of how this will be addressed. The Keeper may choose to return the RMP on this basis.
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## 5. Model Plan Elements: Checklist

### The Scottish Ambulance Service

Element	Present	Evidence	Notes
1. Senior Officer <i>Compulsory element</i>	<b>G</b>	<b>G</b>	<p>The Scottish Ambulance Service has identified Dr Pat O'Connor, Director of Care Quality and Strategic Development as the individual with responsibility for the <i>Records Management Plan</i> (the <i>Plan</i>) in the authority.</p> <p>Dr O'Connor is the authority's SIRO.</p> <p>Overall authority for records management lies with the Chief Executive (<i>Records Management Policy</i> 4.1 – <b>see element 3</b>). However, the <i>Plan</i> makes clear that the CEO has chosen to delegate responsibility for the <i>Plan</i> to the SIRO.</p> <p>Dr O'Connor chairs the Information Governance Committee. This committee, working with the Information Services and Governance Manager (<b>see element 2</b>), has responsibility for implementing the <i>Policy</i>.</p> <p>The Keeper agrees that the Scottish Ambulance Service have identified an appropriate individual to this role as required by the Act.</p>
2. Records Manager <i>Compulsory</i>	<b>G</b>	<b>G</b>	<p>The Scottish Ambulance Service have identified Katy Barclay, Information Services and Governance Manager as the individual responsible for the day-to-day implementation of the <i>Records Management Plan</i> (the <i>Plan</i>).</p>

<p><i>element</i></p>			<p>The Service has supplied the Job Description and Objectives for the Information Services and Governance Manager (evidence 1 and 2). Responsibility for preparing and implementing the <i>Plan</i> is shown in the Objectives.</p> <p>Ms. Barclay chaired the Records Management Project Team set up as a response to the PRSA <b>(see under General Comments below)</b>.</p> <p>Ms. Barclay prepared the <i>Plan</i>, the <i>Business Classification Scheme</i> <b>(see element 4)</b>, the <i>Document Storage, Disposal and Retention Policy</i> <b>(see element 5)</b>, <i>Information Security Policy</i> <b>(see element 8)</b>, <i>Document Version Control and Naming Conventions</i> document <b>(see element 11)</b> and the <i>Records Management Policy</i> <b>(see element 3)</b>.</p> <p>Katy Barclay is the Data Protection Officer for the Scottish Ambulance Service.</p> <p>All of the above shows that Ms Barclay has a detailed knowledge of the records management provision in the Scottish Ambulance Service.</p> <p>The Information Governance Manager reports, through the Head of Strategic Planning, to the Director of Care Quality and Strategic Development <b>(see element 1)</b>.</p> <p>The Keeper agrees that the Scottish Ambulance Service have identified an appropriate person to this role as required by the Act.</p>
<p>3. Policy <i>Compulsory element</i></p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>The Scottish Ambulance Service has a <i>Records Management Policy</i> which has been supplied to the Keeper as evidence 3. This is version 1.00 approved by the Information Governance Committee 22 December 2014.</p>



			<p>The Policy was written by the Information Services Manager (<b>see element 2</b>).</p> <p>Staff at the Scottish Ambulance Service access the <i>Policy</i> on the intranet '@sas'. A screen shot has been provided in evidence (evidence 4).</p> <p>The Introduction to the <i>Policy</i> explains the value of robust records management to the authority. It describes information as a 'corporate asset' (section 2.5). The Keeper commends this recognition.</p> <p>The Keeper agrees that the <i>Records Management Plan</i> corresponds with the aims of the <i>Records Management Policy</i>.</p> <p>The Policy specifically mentions the Public Records (Scotland) Act 2011 (PRSA).</p> <p>The Keeper agrees that the Scottish Ambulance Service has an approved and operational records management policy that is available to appropriate staff as required by the Act.</p>
<p>4. Business Classification</p>	<p><b>A</b></p>	<p><b>G</b></p>	<p>The Scottish Ambulance Service is embarking on a project to populate and roll-out a full business classification scheme.</p> <p>This will be done over the next five years in conjunction with the service areas. The Keeper commends the principle of local involvement in creating a detailed classification and considers that this is likely to result in a stronger business tool. The Scheme is being developed in-line with guidance from the <i>NHS Scotland Code of Practice</i>.</p> <p>The <i>Business Classification Scheme</i>, when complete, will be used to populate any EDRMS adopted by the Service. There is an Action (A20) to do this by 2020.</p>

			<p>The development of the business classification is explained in the Action Plan of element 4 (<i>Plan</i> page 7) which has been signed off by the Chief Executive. Furthermore the Service has submitted the <i>Business Classification</i> framework as evidence 6. This is version 1.00 created by the Information Services Manager (<b>see element 2</b>). It was approved by the Information Governance Committee in May 2015.</p> <p>The Keeper agrees that there is a clear commitment to develop this element over time.</p> <p>The Scottish Ambulance Service keeps records in paper and in electronic format. The <i>Document Storage, Disposal and Retention Policy</i> clearly indicates the existence of paper records (for example section 2.4).</p> <p><b>The Keeper agrees this element of the Scottish Ambulance Service’s Records Management Plan on Improvement Model terms. This means that he acknowledges that the authority has recognised a gap in provision (full business classification not rolled out throughout the authority) and has put procedures in place to close that gap. He agrees this element on the condition that the Service provides updates on the progress of this important project.</b></p>
5. Retention schedule	<b>G</b>	<b>G</b>	<p>The <i>Records Management Policy</i> (<b>see element 3</b>) identifies “consistent and documented retention... procedures” as a core aim of the records management system in the service (<i>Policy</i> section 3.1).</p> <p>To this end the Service has adopted the retention periods set out in the <i>Records Management: NHS Code of Practice (Scotland)</i> and produced a <i>Document Storage, Disposal and Retention Policy</i> which has been submitted to the Keeper as evidence 7. This is version 02.01 created by the Information Services Manager (<b>see element 2</b>) and approved by the Information Governance Committee in December 2014.</p>

			<p>The <i>Document Storage, Disposal and Retention Policy</i> is made available to staff on the intranet '@sas'.</p> <p>The Keeper agrees that the Scottish Ambulance Service has a retention schedule that features all functions shown in the <i>Business Classification</i> framework at element 4 above.</p>
<p>6. Destruction Arrangements <i>Compulsory element</i></p>	<p><b>A</b></p>	<p><b>G</b></p>	<p>The <i>Records Management Policy</i> (<b>see element 3</b>) identifies “consistent and documented disposal... procedures” as a core aim of the records management system in the service (<i>Policy</i> section 3.1). Under ‘Action Points’ for element 6, the Service lists the “Development, approval and implementation of guidance for staff on the confidential disposal of records”. <b>The Keeper requires this Guidance to be submitted as soon as available.</b> The target date appears as June 2017.</p> <p><u>Paper:</u> The <i>Plan</i> clearly indicates that the Scottish Ambulance Service holds hard-copy records (for example page 11) as does the <i>Document Storage, Disposal and Retention Policy</i> (for example section 2.4). The use of internal shredders and external shredding contractors is a feature of this <i>Policy</i>. Evidence has been supplied to the Keeper that shows arrangements are in place with an external contractor and to show that staff have set procedures for the internal destruction of paper records: Agreement with external waste paper disposal companies (<b>Evidence: RMP-Update-01</b>). National Services Scotland paper disposal and destruction procedures (<b>Evidence: RMP-Update-06, RMP-Update-07</b>).</p> <p><u>Electronic:</u> The Scottish Ambulance Service state: “Disposal of electronic records is currently in its infancy within the Service. As part of the Records Management Implementation project, guidance will be created for staff, on the correct disposal of these records, and relevant policies will be updated as required. Destruction logs are being used in some departments, but we recognise that this needs to be rolled</p>

			<p>out throughout the Service”. The Keeper accepts that the business classification roll-out (<b>see element 4</b>) should greatly assist implementing processes for the irretrievable and controlled destruction of electronic records. The Keeper is therefore willing to agree this part of this element under ‘improvement model’ terms.</p> <p><u>Back-ups</u>: Under the <i>Plan</i> at element 10 (page 13) the Service makes it clear that back-ups are taken of electronic records for business purposes. The Scottish Ambulance Service has submitted their <i>Commvault Simpana/Backup System Operation Guide</i> (evidence 25) which shows the back-up cycle and how long records are kept (for example page 32).</p> <p>The Keeper agrees that back-up copies are deleted after a controlled period of retention for continuity purposes.</p> <p><u>Hardware</u>: The Scottish Ambulance Service destroys hardware through a contract with an external organisation (Haven Recycle) the Keeper has been provided with reports and a certificate to demonstrate that this arrangement is in operation (evidence 10 – 12).</p> <p>The Keeper agrees that the Scottish Ambulance Service has arrangements in place for the secure irretrievable destruction of hardware.</p> <p>The <i>Document Storage, Disposal and Retention Policy</i> requires that a log is kept of destroyed records (section 2.5). The Keeper commends this practice. A template destruction log has been provided as part of the <i>Document Storage, Disposal and Retention Policy</i> (evidence 7).</p> <p><b>The Keeper agrees this element under ‘improvement model’ terms. This means that an authority has correctly identified a gap in their records management provision (The management of electronic records destruction is</b></p>
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			not fully embedded in the organisation) and have put processes in place to close that gap. The Keeper’s agreement is conditional on him being provided with updates as the business classification/EDRMS project progresses.
7. Archiving and Transfer <i>Compulsory element</i>	<b>G</b>	<b>G</b>	<p>The <i>Records Management Policy (see element 3)</i> identifies “the permanent preservation of records with archival value” as a core aim of the records management system in the service (<i>Policy</i> section 3.1).</p> <p>To this end the Service has identified the National Records of Scotland as the repository to which they will transfer such records.</p> <p>The Service has supplied the <i>Memorandum of Understanding</i> between the Ambulance Service and NRS as evidence that these arrangements are in place (evidence 13).</p> <p>The Keeper agrees that the Scottish Ambulance Service has in place arrangements to transfer records to a permanent archive as required by the Act.</p>
8. Information Security <i>Compulsory element</i>	<b>G</b>	<b>G</b>	<p>Security of records is a core aim of the Scottish Ambulance Service’s records management system (<b>Policy section 3.1 – see element 3</b>)</p> <p>To this end the Scottish Ambulance Service has an <i>Information Security Policy</i> which has been supplied to the Keeper as evidence 14. This is version 1.00 approved by the Information Governance Committee in April 2015. The <i>Policy</i> was created by the Information Services Manager (<b>see element 2</b>).</p> <p>The <i>Policy</i> can be consulted by the Service’s staff on the intranet. A screen shot has been provided as evidence that this is active (evidence 16).</p>

			<p>The Job Description provided as evidence 1 describes Ms Barclay (<b>see element 2</b>) as organisational lead for information security and confidentiality.</p> <p>The <i>Information Security Policy</i> is reviewed bi-annually.</p> <p>The Keeper agrees that the Scottish Ambulance Service has an approved and operational information security policy, made available to appropriate staff, as required by the Act.</p>
<p>9. Data Protection</p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>The Scottish Ambulance Service explains data protection to its users on-line <a href="http://www.scottishambulance.com/footer/PrivacyStatement.aspx">http://www.scottishambulance.com/footer/PrivacyStatement.aspx</a>  <a href="http://www.scottishambulance.com/UserFiles/file/TheService/Informationleaflets/Protecting_Personal_Health_Information1.pdf">http://www.scottishambulance.com/UserFiles/file/TheService/Informationleaflets/Protecting_Personal_Health_Information1.pdf</a></p> <p>They are registered with the Information Commissioner: Z5417525</p> <p>The Scottish Ambulance Service have submitted their <i>Patient Information and Confidentiality Leaflet</i> (Version 2.00) as evidence 21. This leaflet is provided to service users. It clearly explains the rights, under the Data Protection Act, of ‘subject access enquiries’ (section 10 of the <i>Leaflet</i>). It also mentions the 8 principles of data protection (section 9).</p> <p>The Scottish Ambulance Service have submitted their current <i>Data Protection Policy</i>. <b>The Keeper notes that this policy is shortly to be reviewed and requests that any updated version is forwarded when available in order that he may keep the Services’ submission up-to-date.</b></p> <p>Katy Barclay is the Data Protection Officer for the Scottish Ambulance Service.</p> <p>The Keeper agrees that the Scottish Ambulance Service has properly considered</p>

			their responsibilities under the Data protection Act 1998.
10. Business Continuity and Vital Records	<b>A</b>	<b>G</b>	<p>The Scottish Ambulance Service does not currently have a service-wide <i>Business Continuity Plan</i>.</p> <p>However they state: “A full Disaster Recovery Plan for recovering systems and records is in development. Identification of Vital Records will be completed and listed as part of this document.”</p> <p>A draft version of this document has been provided to the Keeper as evidence that business continuity is being considered in the authority. The Draft is dated October 2015.</p> <p><b>The Keeper agrees this element of the Scottish Ambulance Service’s records management plan under ‘improvement model’ terms. This means that the authority has identified a gap in its records management provision (business continuity arrangements are in development) and have put processes in place to close that gap. The Keeper’s agreement is conditional on the Service providing updates as the project develops.</b></p>
11. Audit trail	<b>A</b>	<b>G</b>	<p><b>See element 4 for the development of a <i>Business Classification Scheme</i>.</b></p> <p>Most electronic systems, such as PECOS (evidence 29) have document tracking built-in, but currently there is no overarching system that allows all records to be efficiently located centrally.</p> <p>The Scottish Ambulance Service is developing a <i>Business Classification Scheme</i> which will assist in record location, but in the meantime they have a <i>Document Version Control and Naming Conventions</i> document which has been provided to the</p>

			<p>Keeper as evidence 26. This is version 1.00 approved by the Information Governance Committee in December 2014.</p> <p>This document is available on the intranet and a screen shot has been supplied evidencing this (evidence 4)</p> <p><b>The Keeper agrees this element on ‘improvement model’ terms. This means that he acknowledges that the Scottish Ambulance Service have identified a gap in provision (unstructured records cannot be satisfactorily tracked) and have put programmes in place to close that gap (the business classification/EDRM project). The Keeper’s agreement is conditional on him being provided with updates as the project progresses.</b></p>
<p>12. Competency Framework for records management staff</p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>The <i>Records Management Policy (see element 3)</i> identifies “that all staff are made aware of their responsibilities for record-keeping and record management” as a core aim of the records management system in the service (<i>Policy</i> section 3.1 and section 9).</p> <p>The Scottish Ambulance Service have provided the <i>Information Services/Governance Manager (see element 2) Job Description</i> (evidence 1). This makes clear that the post-holder is responsible for implementing the <i>Plan</i> (section 5).</p> <p>The Keeper has also received the <i>Personal Objectives</i> for Katy Barclay (<b>see element 2</b>) which include “Lead on the implementation of the RMP over the coming 5 years.”. The Keeper thanks Ms. Barclay for sharing that document.</p> <p>The <i>Job Description and Objectives (see element 2)</i> shows that the Information Services and Governance Manager has responsibility for identifying training for staff in records management.</p>



			<p><b>See <u>Records Management Champions</u> under General Comments at end.</b></p> <p>The Keeper agrees that the Information Services and Governance Manager has the proper resources to carry out the role explained in element 2 and that the Scottish Ambulance Service have considered appropriate information governance training for their staff.</p>
<p>13. Assessment and Review</p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>It is a requirement of the Public Records (Scotland) Act 2011 that authorities should keep their records management plans under review.</p> <p>The <i>Plan</i> commits the Service to fully review the elements of the <i>Plan</i> by December 2016 (<b>see <u>Records Management Project Team</u> under General Comments below</b>).</p> <p>The review will be carried out by the Information Services and Governance Manager (<b>see element 2</b>) and results reported at the quarterly meetings of the Audit Committee.</p> <p>This matches section 8 of the <i>Records Management Policy</i> (<b>see element 3</b>) which sets out a requirement for the regular audit of records management practices and that results from this audit are to be reported to the Service’s Audit Committee.</p> <p>The Scottish Ambulance Service commits to using a “detailed action tracker” to monitor progress against the “Action Plan” section of the submitted <i>Records Management Plan</i>. The Keeper has been provided with a sample of how this tracker will appear.</p> <p>The <i>Information Security Policy</i> (<b>see element 8</b>) is reviewed bi-annually.</p>

			<p>The <i>Document Version Control and Naming Conventions</i> document (<b>see element 11</b>) is reviewed bi-annually.</p> <p>The Keeper agrees that the Scottish Ambulance Service has arrangements in place to review the <i>Records Management Plan</i> as required by the Act.</p>
14. Shared Information	<b>G</b>	<b>G</b>	<p>The Scottish Ambulance Service shares information with other organisations as part of its business. It does this through an <i>Information Sharing Agreement</i>. A sample of such an agreement has been provided as evidence 34.</p> <p>This appears to be a robust document which clearly sets out information governance at the outset of a data sharing project (clauses 7 – 9).</p> <p>Katy Barclay (<b>see element 2</b>) is responsible for collating data sharing agreements in the authority.</p> <p>The Keeper agrees that the Scottish Ambulance Service properly considers the governance of records processed during data sharing programmes.</p>

## The Scottish Ambulance Service

### Version

This assessment is on the *Records Management Plan* (the *Plan*) of The Scottish Ambulance Service version 1.00 (Final) approved by Pauline Howie, Chief Executive on 19<sup>th</sup> June 2015. The *Plan* was written by Katy Barclay, Information Services and Governance Manager (**see element 2**).

The *Plan* contains an introduction by the Service's Chief Executive on page 3.

The *Plan* explains actions against each element. As the *Plan* is signed off by the Chief Executive it can be taken that any confirmed actions that appear within it are also approved.

The Scottish Ambulance Service's *Plan* is structured around the Keeper's Model Plan <http://www.nrscotland.gov.uk/record-keeping/public-records-scotland-act-2011/resources/model-records-management-plan>

### **Third Parties**

The Scottish Ambulance Service does not contract out any of its functions to a third party.

### **Records Management Project Team**

The Scottish Ambulance Service set up a project team to meet the requirements of the Public Records (Scotland) Act 2011 prior to submission of the Scottish Ambulance Service's *Records Management Plan*. The Team's terms of reference, a sample agenda and a report to the Scottish Ambulance Service Board showing the creation of the Team have been provided to the Keeper (evidence 5, 32, 33). The Records Management Project Team includes representatives of services. The Keeper commends the involvement of local service areas in the development of a records management system. The Team is chaired by Katy Barclay (**see element 2**). After agreement a new group the Record's Management Implementation Team will be set up. This Team will be responsible for progressing agreed action plan and overseeing the implementation and review of the *Plan*. The Keeper welcomes the creation of the Implementation Team as providing the natural furtherance of the work of the Project Team .

### **Records Management Champions**

The Scottish Ambulance Service makes a statement in the *Plan* (page 15) that there is an aim to "have a records management champion within each directorate." The Keeper encourages this principle as likely to establish better engagement with the *Plan* in local business areas. The *Plan* goes on to commit that, when these 'champions' are identified, relevant training will be made available. The Keeper welcomes this commitment.

## 6. Keeper's Summary

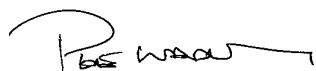
Elements 1 - 14 that the Keeper considers should be in a public authority records management plan have been properly considered by the Scottish Ambulance Service. Policies and governance structures are in place to implement the actions required by the plan.

## 7. Keeper's Determination

Based on the assessment process detailed above, the Keeper **agrees** the RMP of the **Scottish Ambulance Service**.

- The Keeper recommends that the Scottish Ambulance Service 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 Scottish Ambulance Service. In agreeing this RMP, the Keeper expects the Scottish Ambulance Service to fully implement the agreed RMP and meet its obligations under the Act.

A handwritten signature in black ink, appearing to read 'Tim Ellis', enclosed within a thin black rectangular border.

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