

Public Records (Scotland) Act 2011

Scottish Canals Assessment Report

The Keeper of the Records of Scotland

24 August 2017

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1. Public Records (Scotland) Act 2011

The Public Records (Scotland) Act 2011 (the Act) received Royal assent on 20 April 2011. It is the first new public records legislation in Scotland since 1937 and came fully into force on 1 January 2013. Its primary aim is to promote efficient and accountable record keeping by named Scottish public authorities.

The Act has its origins in *The Historical Abuse Systemic Review: Residential Schools and Children's Homes in Scotland 1950-1995* (The Shaw Report) published in 2007. The Shaw Report recorded how its investigations were hampered by poor record keeping and found that thousands of records had been created, but were then lost due to an inadequate legislative framework and poor records management. Crucially, it demonstrated how former residents of children's homes were denied access to information about their formative years. The Shaw Report demonstrated that management of records in all formats (paper and electronic) is not just a bureaucratic process, but central to good governance and should not be ignored. A follow-up review of public records legislation by the Keeper of the Records of Scotland (the Keeper) found further evidence of poor records management across the public sector. This resulted in the passage of the Act by the Scottish Parliament in March 2011.

The Act requires a named authority to prepare and implement a records management plan (RMP) which must set out proper arrangements for the management of its records. A plan must clearly describe the way the authority cares for the records that it creates, in any format, whilst carrying out its business activities. The RMP must be agreed with the Keeper and regularly reviewed.

2. Executive Summary

This report sets out the findings of the Keeper's assessment of the RMP of Scottish Canals by the Public Records (Scotland) Act 2011 Assessment Team following its submission to the Keeper on 30 November 2017.

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

3. Authority Background

The British Waterways Board, operating as Scottish Canals, continues in Scotland as a stand-alone public body following the transfer of the functions of the British Waterways Board in England and Wales to the Canal & River Trust on 2nd July 2012. Following the approval of The British Waterways Board (Transfer of Functions) Order 2012 ("the BW Order") Scottish Canals assumed responsibility and accountability for the Scottish Canals, and will meet regularly at canal-side locations across Scotland.

Scottish Canals is the operating name of the British Waterways Board.

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 Scottish Canals' 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:

G	The Keeper agrees this element of an authority's plan.		A	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.		R	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

Element	Present	Evidence	Notes
1. Senior Officer <i>Compulsory element</i>	G	G	<p>The Records Management Plan (RMP) of Scottish Canals identifies Steve Dunlop, Chief Executive, as having overall strategic responsibility for records management. This is confirmed in a letter from Mr Dunlop which accompanied the submission of the RMP (evidence 001). The letter also expresses Mr Dunlop's support for the Records Manager and endorses the Records Management Policy.</p> <p>The Records Management Policy (evidence 002) also confirms that the Chief Executive has responsibility for ensuring that the provisions of the RMP are implemented across the organisation and providing support and resources so that the RMP can be maintained.</p>

			<p>The Chief Executive also sits on the Records Management Group. The Group comprises staff from across Scottish Canals and meets on a quarterly basis to discuss records management issues and to report the progress of any work in relation to the implementation of the RMP.</p> <p>The Keeper agrees that an appropriate individual has been identified to take senior management responsibility for records management as required by the Public Records (Scotland) Act 2011 (PRSA).</p>
2. Records Manager <i>Compulsory element</i>	G	G	<p>The RMP identifies Angharad Stockwell, Records Manager, as having operational day-to-day responsibility for records management within Scottish Canals. The covering letter from the Chief Executive (see Element 1) although it does not explicitly name Ms Stockwell evidences his support for the Records Manager.</p> <p>The Records Management Policy (evidence 002) describes the Records Manager’s responsibilities as including the delivery of the RMP and associated policies and procedures and for communicating these to staff. The Records Manager is also responsible for the provision of guidance and training as well as keeping the RMP up-to-date.</p> <p>The Records Manager’s Job Summary has also been supplied (evidence 003). This also shows a clear responsibility for the implementation and maintenance of the RMP.</p> <p>The Keeper agrees that an appropriate individual has been identified to take operational responsibility for records management as required by the PRSA.</p>
3. Policy <i>Compulsory element</i>	G	G	<p>Scottish Canals has submitted its Records Management Policy, version 1.7, approved in November 2016 (evidence 002). The Policy highlights the recognition that records are a valuable business asset and that all records, whether electronic</p>

			<p>or hard-copy, need to be managed appropriately under the provisions of the RMP. A set of 10 principles underpins Scottish Canals' commitment to best practice records management. The Policy also describes how the responsibilities for records management across the organisation have been allocated. A screenshot of the location of the Policy on the <i>NETconsent</i> system has been submitted (evidence 004). Some governance documents are also available on shared drives, Scottish Canals' intranet and also on the external facing website and screenshots have been submitted showing this (evidence 005).</p> <p>The Keeper agrees that Scottish Canals has an operational policy statement which outlines their corporate approach to records management and which is available to staff.</p>
4. Business Classification	A	G	<p>The RMP states that at present Scottish Canals does not yet have an operational Business Classification Scheme (BCS). The RMP goes on to say that the intention is to create a BCS based on a three level functional model which identifies the functions, activities and transactions which create records. This must remain a business decision for the authority but the Keeper recognises that the functional model is currently considered best practice as it is more resilient to changes within the business, such as restructuring.</p> <p>The work to create a BCS is built into the Records Management Improvement Plan which forms Appendix 3 of the RMP. This has an estimated completion date of July 2017. The Keeper requests that he is kept informed on the progress of this work. He also commends the intention to consult with staff as mentioned in the Improvement Plan as this is likely to lead to a more robust BCS.</p> <p>At present, records are created and managed by department and by project. An organogram of the current structure of Scottish Canals has been provided (evidence</p>

			<p>006).</p> <p>Scottish Canals has confirmed that none of its functions are carried out by a third party.</p> <p>The Keeper can agree this Element on an ‘Improvement Model’ basis. This means that the authority has identified a gap in provision (the lack of an operational BCS) and has shown how it intends to close this gap. As part of this agreement, the Keeper requests that he is kept informed on the progress of work to close this gap.</p>
<p>5. Retention schedule</p>	<p>A</p>	<p>G</p>	<p>The RMP states that Scottish Canals has a retention schedule in place and this has been submitted (evidence 007). The RMP goes on to say that the retention schedule was originally created before 2012 prior to the creation of Scottish Canals and that this requires to be updated to meet current needs. It will be informed by the creation of the BCS.</p> <p>The work to update the retention schedule is built in to the Records Management Improvement Plan and is aligned with the development of the BCS. This work will also be used to identify vital records (see Element 10). Tied in to the work updating the retention schedule will be the development of a retention and disposals policy and procedures. The estimated timescale for the completion for these strands of work is March 2018. The Keeper requests that he is kept informed of progress in this area.</p> <p>The Keeper can agree this Element on an ‘Improvement Model’ basis. This means that the authority has identified a gap in provision (the lack of an up-to-date retention schedule) and has outlined how it intends to close this gap. This agreement is dependent upon the Keeper being kept informed of progress on the work to close the gap.</p>

<p>6. Destruction Arrangements <i>Compulsory element</i></p>	<p>A</p>	<p>G</p>	<p>The RMP states that records are destroyed in accordance with the requirements of the current retention schedule. The RMP outlines Scottish Canals' procedures for the disposal of the following:</p> <p>Paper – Non-sensitive paper waste is disposed of in bins across Scottish Canals' multiple sites and either recycled or disposed of as appropriate. Sensitive and confidential waste is placed into securely locked consoles at the head office in Glasgow and at West Mains, Grangemouth. These are emptied on a regular basis by a third-party contractor, Biffa, and their sub-contractor phs Datashred, who then securely shred the contents. A letter from Biffa has been supplied as evidence which describes the processes involved in uplifting and securely destroying confidential waste (evidence 008). A sample Collection Note (evidence 011) has been submitted showing that these procedures are operational.</p> <p>All other offices use on-site shredders to dispose of sensitive and confidential waste. One of the recommendations of the RMP states that Scottish Canals intends to extend the provision of secure shredding across all of its sites. The Keeper requests that he is kept updated on this aspect of the RMP.</p> <p>Electronic – The RMP states that, at present, electronic records are not managed or disposed of in a systematic manner and that an Electronic Document and Records Management System (EDRMS) is being considered to impose control on digital records. The Records Management Improvement Plan details the proposed steps involved in the investigation, procurement and rolling-out of an EDRMS with an eventual completion date of 2021. Stage 2 of the phased improvement plan will investigate options for EDRMS solutions as well as alternatives. Once the options appraisal has been completed (July 2019) a decision will be made as to whether to procure and implement an EDRMS or to choose an alternative solution. Scottish Canals has committed to ensuring that the Keeper is kept informed.</p>
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			<p>The Keeper can accept this provided he is regularly informed of progress. Should Scottish Canals decide not to pursue the option of using an EDRMS it will need to outline the way in which it will manage its electronic records, for example, using structured shared drives.</p> <p>Hardware – The RMP states that hardware such as PCs, laptops and monitors are securely destroyed by a third-party specialist as and when required. When such hardware is to be sold on or recycled it is subjected to a secure data wipe. A sample destruction certificate and a list of all hardware destroyed has been provided (evidence 009).</p> <p>Back-ups – Scottish Canals', quite correctly, routinely backs up its electronic records and systems on a regular basis for business continuity purposes. Scottish Canals states that there is currently no routine destruction of backed up records and information. This has been identified as an action in the Records Management Improvement Plan. The current back-up regime has been outlined in an email from the Head of ICT to the Heads of Service (evidence 013). Nightly incremental back-ups of shared drives, email and databases are taken with a full monthly back-up saved to tape. These tapes are retained indefinitely. The email goes on to outline that from August 2017 ICT will only retain tape back-ups for three months. This will be accompanied by the Records Manager working with business areas to implement the requirements of the retention schedule.</p> <p>The Keeper can agree this Element on an 'improvement model' basis. This means that the authority has identified a gap in provision (the ability to systematically delete electronic records and back-ups) and has identified how it intends to close this gap. The Keeper's agreement will be dependent upon being kept informed as work progresses in closing the gap in provision.</p>
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<p>7. Archiving and Transfer <i>Compulsory element</i></p>	<p>G</p>	<p>G</p>	<p>Scottish Canals defines its archival records as those dating prior to 1962 which saw the establishment of the British Waterways Board.</p> <p>To govern the longer term process of transferring records to NRS, Scottish Canals has entered into a Memorandum of Understanding with NRS. This has been submitted to the Keeper (evidence 014). The transfer of some archival material has already taken place and a list of the items transferred has been supplied (evidence 018).</p> <p>Also submitted is a catalogue of records relating to the Caledonian Canal (evidence 015) which had been deposited with Highland Council Archive.</p> <p>The RMP states that Scottish Canals maintains its own semi-current storage facility at West Mains, Grangemouth. In addition, some records are also held at Scottish Canals Headquarters in Glasgow and at the Caledonian Canal Office in Inverness. One of the actions included in the Records Management Improvement Plan is to amalgamate these records and store them in a single purpose built storage facility. The options appraisal for this project is listed as having an estimated completion date of December 2019. The Keeper requests that he is kept informed of the progress of work in this area.</p> <p>Tied in to the project to identify options for a new storage building is the recognition that the cataloguing of semi-current records has been inconsistent and not done to relevant standards. This is confirmed by an assessment that has been carried out into the current state of Scottish Canals' catalogues (evidence 016). Built in to the Records Management Improvement Plan is a commitment to investigate options to improve the current level of provision, including the appointment of an archivist and procurement of an Archival Management System. This work also has a proposed completion date of December 2019. Again, the Keeper requests that</p>
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			<p>he is updated as this work moves forward.</p> <p>The Keeper commends the consideration of the construction of a new purpose built facility for the storage of its semi-current records and for the recognition of the need to appropriately catalogue records stored there and the actions identified to achieve this.</p> <p>Record disposal is currently carried out in line with the retention schedule (evidence 007). This is due to be updated and replaced by an overarching Records Retention and Disposals Policy which will clearly describe the procedures for the disposal of records. The Keeper looks forward to receiving a copy of the new Policy when it becomes available.</p> <p>Record disposals will be accompanied by a Records Disposal Request Form (evidence 012).</p> <p>The Keeper agrees that there are arrangements in place to allow Scottish Canals to transfer records selected for permanent preservation to an appropriate archive.</p>
<p>8. Information Security <i>Compulsory element</i></p>	<p>G</p>	<p>G</p>	<p>Scottish Canals has submitted its ICT Information Security Policy, version 2.06 (evidence 023). This outlines the procedures in place for protecting information and records in both electronic and paper format. The Policy also covers use of the internet, email, mobile devices and using information outside the office environment.</p> <p>The Policy is supported by a suite of other policies:</p> <p>Data Encryption Policy (evidence 019) – provides staff with guidance on protecting portable storage and mobile devices, laptops and desktop computers;</p> <p>Email Policy (evidence 020) – This Policy sets out the standards expected of staff using email and instant messaging as means of communicating;</p>

			<p>Password Policy (evidence 021) – This Policy highlights the importance of good password management to ensure that Scottish Canals’ systems are protected from unauthorised access;</p> <p>Acceptable Use Policy (evidence 022) – The Policy outlines the measures in place to protect the information and systems managed by Scottish Canals.</p> <p>The RMP states that these are all available to staff through the <i>NETconsent</i> system. A screenshot of the relevant area of the system has been supplied (evidence 030) showing the availability of the abovementioned policies.</p> <p>In February 2016 Scottish Canals achieved accreditation at CyberEssential PLUS level. This is a Government scheme to assist organisations in protecting themselves against cyber-attacks. A certificate showing the accreditation has been supplied (evidence 024).</p> <p>Scottish Canals operates a multi-location data centre storage system. Data stored on servers is backed-up on a nightly basis to Saughton House, which is then backed-up on a weekly basis to Falkirk. A Memorandum of Understanding (MoU) between Scottish Canals and the Scottish Government’s Information Services and Information Systems department governing this arrangement has been supplied (evidence 027). On a monthly basis, back-up tapes are taken and transferred to a secure off-site storage facility (Iron Mountain). This arrangement is confirmed by letter and a service specification (evidence 025 and 026). If there is a problem accessing the primary data centre at Saughton House, records and data stored at the secondary data centre in Falkirk should still be available.</p> <p>The RMP states that its ICT systems are able to be configured to restrict access to and editing rights on files and folders within its shared drives.</p>
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			<p>Scottish Canals operates an in-house storage facility based at West Mains in Grangemouth. This is a secure, purpose built temperature controlled facility. Records are stored in archive quality boxes on custom built shelving. The specification for the building has been submitted (evidence 028).</p> <p>The RMP states that Scottish Canals' sites and offices are protected by keypad entry and visitor sign-in procedures, and records are protected by being stored in lockable cabinets. Premises are also protected by CCTV and patrols by security staff. These arrangements have been supplied to the Keeper (evidence 031).</p> <p>The recommendations section of this Element sets out the intention of Scottish Canals to investigate the possibility of implementing an Electronic Document and Records Management System (EDRMS) and also re-locating its in-house archive. The Keeper requests that he is kept informed of the progress of these initiatives as they will impact on the provisions of the RMP.</p> <p>The Keeper agrees that there are appropriate arrangements in place to allow Scottish Canals to protect the information it creates and manages.</p>
9. Data Protection	G	G	<p>Scottish Canals is registered as a Data Controller with the Information Commissioner's Office (reference number Z7148998) (evidence 034). The Head of Legal Services is responsible for ensuring that this registration is kept up-to-date. They are also responsible for managing Freedom of Information requests, Environmental Information Regulations Requests and Subject Access Requests, although the RMP states that the Chief Executive (see Element 1) is ultimately responsible for compliance with the Data Protection Act 1998.</p> <p>Scottish Canals has submitted its Data Protection Policy, version 1.2 approved in October 2016 (evidence 033). The Policy describes the authority's approach to Data Protection and outlines the responsibilities for complying with the Act. The Policy</p>

			<p>also describes the Data Protection Principles and how to identify and deal with a Subject Access Request. The Data Protection Policy, along with other governance documents, are available to staff on an area of the shared drives (evidence 005). The Improvement Plan states the intention to ensure that corporate policies are managed and distributed by the <i>NETconsent</i> system by March 2018.</p> <p>The Policy is published on Scottish Canals' website. The Keeper commends this outward-facing approach in making key policy documents available to stakeholders.</p> <p>Also submitted is the ICT Information Security Policy (evidence 023), which deals with the protection of the information created and managed by Scottish Canals.</p> <p>Scottish Canals also has an FOI and Environmental Information Requests Policy (evidence 035) which provides staff with a useful guide for dealing with requests for information.</p> <p>The Keeper agrees that Scottish Canals has procedures in place to protect the personal information it processes.</p>
<p>10. Business Continuity and Vital Records</p>	<p>A</p>	<p>G</p>	<p>The RMP states that a Business Impact Analysis was carried out in 2014 to identify Scottish Canals' business critical services and the findings from this work were used to inform the development of the Emergency Arrangements and Business Continuity Management Plan (evidence 036). The Plan describes the procedures in place to allow Scottish Canals to resume normal business operations in the event of an emergency or disaster.</p> <p>Also submitted is an extract from an audit report compiled by Scottish Canals' Internal Auditors (evidence 037) who conducted an audit into the business continuity and emergency planning arrangements. The report made several recommendations to improve the documentation relating to business continuity. The work to identify vital records will form part of the work to develop a BCS/retention schedules.</p>

			<p>The Records Manager will work with Heads of Service and record owners to identify vital records and these will be included in the Emergency Arrangements and Business Continuity Management Plan. This work is included in the Records Management Improvement Plan and has an estimated completion date of July 2018. The Keeper requests that he is kept informed as this work progresses.</p> <p>The Keeper can agree this Element on an 'Improvement Model' basis. This means that the authority has identified a gap in provision (vital records have not been identified) and has evidenced a commitment to closing this gap. As part of this agreement the Keeper expects to be kept up-to-date with the progress of work.</p>
11. Audit trail	A	G	<p>The RMP states that Scottish Canals uses a system called <i>ADAudit</i> to track changes made in the shared drives. The system is able to identify and log every file or folder that has been created, edited, moved or deleted and keeps this information for six months. The system can also locate and restore files and folders if necessary. A screenshot from the system has been submitted (evidence 029). Scottish Canals also utilises a number of systems to manage data, for example in asset management, accounting, HR and payroll. The RMP states that all of these systems have varying levels of audit trail functionality to identify changes to records such as creation, editing and deletion, and also who was responsible for the changes. Examples of the audit trail provisions for these systems have been submitted as screenshots (evidence 039, 040, 042 and 043). Scottish Canals is also considering purchasing software which would increase the level of provision in its accounting system. A description of this tool has also been provided (evidence 041).</p> <p>Governance documents such as policies, strategies and standards are all subject to version control, but this doesn't extend further into other records created by Scottish Canals. A sample of the version control employed in these documents has been provided (evidence 038). It is anticipated that the</p>

			<p>introduction of an EDRMS will improve the level of provision in this area.</p> <p>Scottish Canals has provided information on the audit trail provisions in place for its paper records. Paper and other hardcopy records at the end of their operational usage are boxed and sent into semi-current storage. These records are logged by the record owner using electronic and hard-copy catalogues and databases and a copy of the catalogue is sent to the Records Manager. An overarching catalogue exists for the records stored at the West Mains facility. This is used to track the movement of records out of the building and when they are returned. Since August 2016 this process has been overseen by the Records Manager and staff must make a formal request for any records. Built into the Records Management Improvement Plan is a commitment to develop a record retrieval and enquiry service. The Keeper requests that he is kept informed of the progress of this work.</p> <p>Paper records are also stored at locations in the Highlands and Glasgow. These are not subject to the same audit trail provisions as those stored at Grangemouth but it is a recommendation of the RMP that all semi-current records in the future will be stored at Grangemouth which will allow greater consistency in their management.</p> <p>Scottish Canals are also investigating the possibility of using a commercial storage provider for its semi-current records. A pilot project will be undertaken using a sample of 200 boxes to measure the feasibility of this option. The Keeper requests that he is kept informed of the results of this pilot and whether it leads to a decision to use the services provided by the commercial provider as this will impact on the RMP.</p> <p>The Keeper can agree this element on an ‘improvement model’ basis. This means that the authority has identified improvements that can be made in the management of its paper records, in particular the lack of audit trail information for some paper records, and has identified how it intends to close</p>
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			<p>this gap. The Keeper's agreement is dependent upon being kept informed of progress.</p>
<p>12. Competency Framework for records management staff</p>	<p style="text-align: center;">A</p>	<p style="text-align: center;">G</p>	<p>The Records Manager (see Element 2) is responsible for the creation and implementation of the RMP. This is confirmed in the Records Management Policy (evidence 002).</p> <p>The Records Manager's Job Summary (evidence 003) and Competency Framework (evidence 046) have also been supplied showing a responsibility for records management. In addition, the Records Manager's Professional Profile (evidence 047) outlines the key qualifications, skills and training undertaken by the Records Manager. Scottish Canals are committed to the Continuing Professional Development of its staff and a sample of the One-to-One form used to appraise staff performance and identify development need has been supplied (evidence 048).</p> <p>The RMP states that a training programme in records management will be developed in partnership with the HR department to promote good records management practice across the organisation. The use of Scottish Canals' current online training system O-LAS to deliver online records management training will be investigated and a screenshot from the system has been provided (evidence 049). A suite of guidance documentation and materials will also be produced. Training will be available to new starts on induction and refresher sessions delivered on an on-going basis. The Records Management Improvement Plan gives an estimated completion date of June 2018. The Keeper requests that he is kept informed of the progress of the development of this training.</p> <p>The RMP also states that all policies and guidance will be made available to staff using the <i>NETconsent</i> system.</p> <p>The Keeper can agree this Element on an 'improvement model' basis. This</p>

			<p>means that the authority has identified a gap in provision (the lack of records management training for staff) and has identified a commitment to closing this gap. As part of his agreement, the Keeper request that he is kept informed of the progress of work in closing this gap.</p>
<p>13. Assessment and Review</p>	<p>G</p>	<p>G</p>	<p>The RMP states that the RMP has been developed in collaboration with colleagues across the organisation and that the policies and procedures supporting the RMP are subject to regular review.</p> <p>The RMP states that after the RMP has been agreed by the Keeper, Scottish Canals' internal auditors will conduct an audit into the levels of compliance achieved by the RMP. A register of actions will be compiled with responsible individuals identified to take these forward. The overall register will be monitored by the Records Manager. Scottish Canals has submitted their Internal Auditors Audit Plan for 2017-18 (evidence 051). Information management forms part of the Audit Plan and an audit of provision will take place in the third quarter of the 2017-18 financial year. The Keeper commends the use of internal auditors in reporting levels of compliance with the RMP and supporting policies and procedures.</p> <p>The Records Manager will conduct an annual review of the RMP. A review can also be triggered in the event of any major organisation or legislation change which has an impact on the records management arrangements of Scottish Canals. Changes in legislation and regulations is actively monitored (evidence 052 and 053). Scottish Canals has provided details of its reporting and governance structures in place with regards to records management. This is set out on page 3 of the Records Management Policy (evidence 002).</p> <p>An agenda for a meeting of the Records Management Group has been submitted (evidence 054). The membership and purpose of the Group is described in the Records Management Policy (evidence 002).</p>

			The Keeper agrees that there are processes in place to ensure that the RMP and supporting policies and procedures are regularly assessed and reviewed.
14. Shared Information	G	G	Scottish Canals has confirmed that it does not routinely share information with third parties. It has also indicated that if this situation were to change then it comply with the provisions set out in this Element which would ensure that information is shared appropriately both within the organisation and with external partners. The Keeper can accept this and requests that he is updated if the situation changes.

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 Scottish Canals. 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 Scottish Canals.

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



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Tim Ellis
Keeper of the Records of Scotland