

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

**Public Authority  
Central Scotland Valuation Joint Board**

**The Keeper of the Records of Scotland**

**28 June 2018**

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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 Central Scotland Valuation Joint Board by the Public Records (Scotland) Act 2011 Assessment Team following its submission to the Keeper on 31 March 2017.

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

### **3. Authority Background**

Central Scotland Valuation Joint Board was established by the Valuation Joint Boards (Scotland) Order 1995 to carry out the valuation functions of Clackmannanshire, Falkirk and Stirling Councils. It came into existence on 1st 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 4 Councillors representing Stirling Council, 8 Councillors representing Falkirk Council and 3 Councillors representing Clackmannanshire Council.

In order to carry out the valuation and registration functions, the Joint Board is required by law to appoint an Assessor who is an independent statutory official and who will also be a Chartered Surveyor. The Assessor has also been appointed by the three constituent councils as Electoral Registration Officer. In pursuit of these duties the Assessor and Electoral Registration Officer is answerable to the Courts in terms of valuation or registration decisions.

The Joint Board, through the office of the Assessor and Electoral Registration Officer and staff, carry out three main functions:

1. To produce and maintain the Valuation Roll which sets out the rateable values of all "*lands and heritages*" (except where excluded by statute) for rating purposes.
2. To prepare and maintain the Register of Electors.
3. To produce and maintain the Valuation List which sets out the banding of all dwellings for Council Tax.

## 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 [named public authority]’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

Element	Present	Evidence	Notes
1. Senior Officer <i>Compulsory element</i>	<b>G</b>	<b>G</b>	<p>The Records Management Plan (RMP) of Central Scotland Valuation Joint Board (hereafter known as CSVJB for ease of reference) identifies Pete Wildman, Assessor and Electoral Registration Officer, as having senior management responsibility for records management. This is confirmed in a statement from Mr Wildman (evidence 001) which expresses support for the Records Manager (see Element 2), and indeed, for all staff with responsibility for records management. Mr Wildman also states that he realises the benefits of best practice records management.</p> <p>The RMP itself also contains a covering statement which is signed by Mr Wildman.</p> <p>The appointment of Mr Wildman in this role is also confirmed in section 6.2 of CSVJB's Records Management Policy (evidence 002).</p> <p>The Keeper agrees that an appropriate individual has been identified to take strategic responsibility for records management as required by the Public Records (Scotland) Act 2011.</p>
2. Records Manager <i>Compulsory element</i>	<b>G</b>	<b>G</b>	<p>The RMP identifies Jane Wandless, Assistant Assessor, as having day-to-day operational responsibility for records management within CSVJB. This post of Records Manager is fully supported by the Assessor and Electoral Registration Officer (see Element 1). This is confirmed in a statement (evidence 001).</p> <p>Section 6.7 of the Records Management Policy (evidence 002) confirms the role of</p>

			<p>the Assistant Assessor, who is responsible for ensuring that all records management practices and procedures comply with relevant standards and statutory requirements. Ms Wandless is also responsible for providing relevant advice and guidance to line managers within CSVJB.</p> <p>Also submitted as evidence is Ms Wandless’s Job Profile (evidence 003). This clearly shows that she acts as the Records Manager for CSVJB.</p> <p>The Keeper agrees that an appropriate individual has been identified to take day-to-day operational responsibility for records management as required by the Public Records (Scotland) Act 2011.</p>
<p>3. Policy <i>Compulsory element</i></p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>The RMP states that CSVJB has several methods of managing its records:</p> <p>Manual filing systems for paper and other physical records;</p> <p>Applications and systems that manage electronic records for specific purposes, such as Electoral Registration, Council Tax and Non-Domestic Rating;</p> <p>Shared drives, personal drives and intranet sites for corporate records.</p> <p>All of these records management systems are governed by the Records Management Policy, version 0.3, approved by the Board on 17 February 2017 (evidence 002) and other records management procedures and guidelines. The Policy highlights the importance of the effective management of CSVJB’s records, irrespective of format, and allocates responsibilities for complying with the Policy. The Policy also evidences a commitment to providing all staff with training to raise awareness of responsibilities with regards to the Data Protection Act 1998, the Freedom of Information (Scotland) Act 2011 and the Public Records (Scotland) Act 2011. The Keeper commends this commitment to providing staff with relevant training.</p>

			<p>The RMP states that the Policy is available for staff to view on the CSVJB intranet and also the external website. CSVJB has submitted a screenshot of the relevant area of its intranet showing the location of the Policy and other information governance documents (evidence 041). Additionally, CSVJB has also provided the Keeper with a link to where the Policy sits on its website. The Keeper commends this approach of publishing key records management policies to its external website to provide information to its stakeholders.</p> <p>The Keeper agrees that CSVJB has an operational policy statement of its corporate approach towards records management.</p>
4. Business Classification	<b>A</b>	<b>G</b>	<p>CSVJB has developed a three level functional Business Classification Scheme (BCS) (evidence 006) to identify its functions and the records created in carrying these out. The BCS follows a functional model and details the functions of CSVJB, the activities required to carry out these functions and the transactions that create records. The Keeper currently considers the functional approach to be best practice due to its ability to withstand the changes in organisational structure.</p> <p>The BCS has been created to operate alongside the Document retention and Disposal Schedule (evidence 007).</p> <p><b>The ‘Future Developments’ section of this Element states that the BCS has not yet been rolled-out across the organisation. CSVJB has provided information regarding its plans to implement the BCS. The Future Developments section of this Element states that it is anticipated that the work to develop and roll out the BCS will take approximately two years. The Keeper can accept this and requests that he is kept informed as work progresses. CSVJB is also currently implementing SharePoint as its EDMS. The BCS will provide the structure for migrating records and information from shared network drives to SharePoint. Screenshots showing the structure of records on the EDMS</b></p>



			<p>(evidence 043-045) have been submitted as evidence. CSVJB has submitted a Progress Report for the work of this project as at March 2018 (evidence 030A). The EDMS was due for a soft launch in April 2018 and the Keeper would be interested to find out how the system is operating at an appropriate time after full roll-out</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 a fully rolled-out BCS and EDMS) and has identified how it intends to close this gap. This agreement is dependent upon the Keeper being kept informed on the progress of work to close this gap.</p>
5. Retention schedule	<b>G</b>	<b>G</b>	<p>The Records Management Policy (evidence 002) contains a commitment to adhering to the requirements of the Document Retention and Disposal Schedule (evidence 007). The Schedule, which follows the structure of the BCS (see Element 4), describes the record types it creates, the disposal actions and timescale, how the records will be disposed of, and who is responsible for the destruction. The RMP states that the Schedule will be reviewed every year. The Schedule has been published on CSVJB's website. The Keeper commends the publication of key records management documents.</p> <p>CSVJB also operates a Document Retention and Disposal Policy (evidence 004) which governs the use of the Schedule. It also highlights the importance of recording the destruction of records and the need to check whether records are the subject of a Freedom of Information request prior to destruction. This Policy has also been published online.</p> <p>The 'Future Developments' section of this Element states that the Schedule is currently being used to dispose of records and will also be used to underpin the move from shared drives to the EDMS.</p>

			<p>The Keeper agrees that CSVJB has an operational retention schedule which describes the retention and disposal requirements of the records it creates.</p>
<p>6. Destruction Arrangements <i>Compulsory element</i></p>	<p><b>A</b></p>	<p><b>G</b></p>	<p>Section 5.1 of the Records Management Policy (evidence 002) contains a commitment to review and consolidate destruction arrangements to detail the correct procedures for disposing of business information. The RMP details the following arrangements for the destruction of CSVJB records:</p> <p><b><u>Paper records (on-site)</u></b> – The RMP states that confidential waste is stored in secure locations within the office until this is collected and securely shredded on-site by a commercial shredding contractor (Paper Shredding Services Ltd). Provided as evidence is a Confidentiality Agreement covering the records disposed of by the contractor (evidence 009) and also a sample Certificate of Destruction (evidence 010) showing that these arrangements are operational.</p> <p><b><u>Paper records (off-site)</u></b> – CSVJB has provided a statement in the RMP to the effect that, at present, CSVJB does not engage a third party contractor to store records off-site. The Keeper accepts this statement.</p> <p><b><u>Electronic records</u></b> – The application of CSVJB’s Retention and Disposal Schedule (evidence 007) is governed by the Document Retention Policy (evidence 004) which applies to all records including electronic. Section 5 of the Policy outlines the criteria for decisions around the retention and disposal of records in line with the Schedule. The project to implement an EDMS would assist with the systematic destruction of electronic records.</p> <p><b><u>Hardware</u></b> – The RMP states that all digital media and IT equipment such as USB drives, hard drives and DVDs are securely destroyed by a specialist contractor on a regular basis. This is done in accordance with the Information Asset Disposal Policy (evidence 008) which outlines the security requirements for contractors for hardware either being destroyed on-site or transported to the place of destruction. Both the</p>

			<p>RMP and the Policy state that the contractor must supply a certificate of destruction detailing the quantities destroyed and the method of destruction. CSVJB has submitted a sample hardware destruction certificate (evidence 010A) as evidence that arrangements are in place.</p> <p><b>Back-ups</b> – The RMP states that back-up tapes are subject to destruction in the same way as hardware such as USB drives and hard drives. This is confirmed in Section 3.2.1 of the Information Asset Disposal Policy (evidence 008). CSVJB has provided evidence of its back-up arrangements. CSVJB regularly backs up its electronic information and systems for business continuity purposes. These are retained for an appropriate period.</p> <p><b>The RMP also states that CSVJB intends to develop a high-level Disposals Register to summarise the destruction of records in line with the Retention Schedule. This will refer to the in-house destruction of both paper and electronic records as well as the destruction carried out by the commercial shredding company engaged by CSVJB. The Keeper commends the intention to develop and implement a Disposals Register.</b></p> <p><b>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 measures to record the destruction of records) and has shown a commitment to closing this gap. This agreement is dependent upon the Keeper being informed of progress as this work moves forward.</b></p>
7. Archiving and Transfer <i>Compulsory element</i>	<b>A</b>	<b>A</b>	<p>The RMP states that the records which CSVJB are statutorily obliged to create (Electoral Register, Valuation Rolls and Council Tax Lists) are sent electronically to the three constituent local authorities, namely Stirling, Falkirk and Clackmannanshire Councils, on an annual basis. Copies of these records are also sent to the National Library of Scotland and the National Records of Scotland. The RMP states that at present CSVJB does not archive records with any other party.</p>

			<p>The Keeper can accept that there are arrangements in place to allow CSVJB to archive the statutory records it is required to create. The RMP states that CSVJB intends to develop a Memorandum of Agreement for the transfer of records selected for permanent preservation to Falkirk Council Archives. This will be a matter for agreement between CSVJB and the archive but records such as the minutes of Board Meetings and Management Team Meetings should be considered for archiving due to their potential historical interest. CSVJB’s retention schedule currently identifies Board papers as being retained indefinitely. The disposal method currently states ‘None’. The Keeper recommends that this is changed to ‘Send to Archives’ similar to that action identified for Printed Valuation Rolls. This should also be the case for other records which need to be transferred to an archive, such as Management Team Minutes possibly. As mentioned above the final decision on what material is sent to an archive will be as a result of discussions between CSVJB and the selected archive. The Keeper, however, requests that at the time of the next revision of the Retention Schedule that this is amended to clarify those records which are transferred to an archive.</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 need to identify records which need to be transferred to an archive and a formal agreement with a suitable archive for transferring records selected for permanent preservation) and has evidenced a commitment to closing this gap. As part of this agreement the Keeper requests that he is sent a copy of the Memorandum of Agreement between CSVJB and the archive once it has been finalised and agreed.</p>
8. Information Security Compulsory	<b>G</b>	<b>G</b>	The RMP states that there are a number of policies in place to protect CSVJB’s information and systems. This is in line with the commitment in the Records Management Policy (evidence 002) to prevent unauthorised access, disclosure or

<p><i>element</i></p>			<p>modification of CSVJB records and information.</p> <p>CSVJB operates an Acceptable Use Policy (evidence 005) for the use of software and hardware. All staff are required to read the Policy and sign the declaration at the end.</p> <p>The Information Handling Policy (evidence 016) defines how CSVJB's should be handled, including the secure disposal of information and the clear desk and screen policy that is in operation.</p> <p>The Access Control Policy (evidence 017) governs access to data held on CSVJB's production systems.</p> <p>The Building Security Procedures (evidence 018) describe the procedures in place to restrict physical access to CSVJB offices.</p> <p>The Domain Password Policy (evidence 026) outlines staff's requirements regarding the creation and maintenance of secure passwords to prevent unauthorised access to systems.</p> <p>The Mobile Device Policy (evidence 021) governs the use of mobile devices such as phones and storage devices.</p> <p>Also provided in CSVJB's Security Incident Reporting and Management Procedure (evidence 019) which describes the processes in place for reporting and responding to a security incident.</p> <p>CSVJB also has procedures in place to manage the risk of potential interruptions to its business. Provided as evidence are risk registers for Local Government Elections in 2017 and a combined organisation-wide Risk Analysis (evidence 013 and 014).</p>
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			<p>These tie in to the overall Risk Management Strategy (evidence 040). Regular reports are provided to the Board meeting relating to organisational risk and a sample report has been supplied (evidence 039).</p> <p>The RMP states that all staff receive training in information security training by completing the Civil Service Learning Module Protecting Information – Level 1. A sample completion certificate has been submitted (evidence 032). All staff have also been vetted at Basic Level by Disclosure Scotland.</p> <p>The RMP also states that all staff have access to these and other Policies. CSVJB has provided screenshots (evidence 046 and 047) showing that staff have access to these policies and guidance.</p> <p>The Keeper agrees that CSVJB has measures in place to protect its information and systems from unauthorised access and misuse.</p>
9. Data Protection	<b>G</b>	<b>A</b>	<p>As Data Controllers, both CSVJB and the Assessor and Electoral Registration Officer are registered as such with the Information Commissioner’s Office (ICO) (registration number: 7353775). A copy of the registration certificate has been supplied (evidence 027).</p> <p>The RMP states that CSVJB is aware of its obligations under, and is committed to adhering to, the Data Protection Act 1998. <b>CSVJB has committed to reviewing its Data Protection Policy as soon as practically possible which will also have regard to the GDPR which will apply from 25 May 2018. This will be supplied to the Keeper once it has been reviewed and approved. The RMP also shows a commitment to providing staff with further training in Data Protection.</b></p> <p><b>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 Data Protection Policy and lack of evidence of how staff are able to</b></p>

			<b>access the Policy). The RMP commits CSVJB to reviewing the Policy in line with the forthcoming requirements of GDPR and the Keeper requests that he is sent the updated approved version of the Policy once it becomes available.</b>
10. Business Continuity and Vital Records	<b>G</b>	<b>G</b>	<p>CSVJB has submitted its Business Continuity Plan (BCP) (evidence 028) which describes its arrangements for resuming its business in the event of a disaster. It also assigns responsibility for activating and reacting to the BCP and highlights the importance of backing up data. The RMP states that the BCP is subject to regular review and is available on the intranet. CSVJB has submitted a screenshot (evidence 028A) showing how staff are able to access the BCP on the CSVJB intranet.</p> <p>The RMP also states that an IT Disaster Recovery Plan (DRP) (evidence 048) is in place for the recovery of electronic records and the Electoral Registration system. It shows the steps to be taken by IT in the event of a disaster. Also submitted is evidence of a planned test of the DRP in December 2017 (evidence 028C). The Keeper commends the commitment to ensuring that procedures and policies are operational.</p> <p>CSVJB also has procedures in place to manage the risk of potential interruptions to its business. Provided as evidence are risk registers for Local Government Elections in 2017 and a combined organisation-wide Risk Analysis (evidence 013 and 014). These tie in to the overall Risk Management Strategy (evidence 040). Regular reports are provided to the Board meeting relating to organisational risk and a sample report has been supplied (evidence 039).</p> <p>The Keeper agrees that CSVJB have procedures in place to resume business in the event of a disaster.</p>
11. Audit trail	<b>A</b>	<b>G</b>	The RMP states that, at present, the electronic systems used by CSVJB to manage its records are able to provide audit trail information. The electronic systems used by

			<p>CSVJB are:</p> <p>Applications and systems that manage electronic records for specific purposes, such as Electoral Registration, Council Tax and Non-Domestic Rating, and;</p> <p>Shared drives, personal drives and intranet sites for corporate records.</p> <p>The RMP states that CSVJB’s Council Tax system and EROS (electoral registration) are able to provide audit trail functionality. Screenshots of the systems used by CSVJB to track actions taken on electronic records managed using bespoke systems have been submitted (evidence 050-052). The RMP also states that CSVJB uses Netwrix Auditor to track changes to electronic records managed on shared network drives. A screenshot of the audit trail functionality provided by this system has been supplied (evidence 049). The RMP also states that personal ‘C’ drives have been disabled and corporate records can therefore no longer be stored there. The Keeper commends this approach.</p> <p><b>The RMP states that the roll-out of the BCS across the organisation will assist with the consistent naming of files and the application of version control. CSVJB are also in the process of restructuring their electronic files on the shared drives in line with the requirements of the BCS. This is part of preparation for the implementation of an EDMS, which in turn will further assist with audit trail provision for electronic records. A Working Group has been set up to manage this project. CSVJB has submitted a Progress Report for the work of this project as at March 2018 (evidence 030A). The EDMS was due for a soft launch in April 2018 and the Keeper would be interested to find out how the system is operating at an appropriate time after full roll-out as well as the more consistent application of file names and version control.</b></p> <p><b>The RMP states that CSVJB currently manages around 150,000 paper files.</b></p>
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			<p>The RMP states that CSVJB are currently undertaking a project to scan all domestic and non-domestic property files. These digitised files will then be managed using the EDMS (SharePoint). This has an estimated completion date of March 2020. An update on progress to date in the form of a Gant chart has been supplied (evidence 053) has been supplied and the Keeper thanks CSVJB for this update. The remaining paper files will diminish as the project moves forward but CSVJB is actively considering implementing a file tracking system. The Keeper requests that he is kept informed of the progress of this initiative.</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 a process for tracking the movement of paper records) and has evidenced a commitment to closing the gap. This agreement is dependent upon the Keeper being kept informed of the progress of this work.</p>
<p>12. Competency Framework for records management staff</p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>The RMP states that despite being a relatively small organisation with limited resources it is committed to providing appropriate training to staff with records management responsibilities. The provision of training is a commitment set out in the Records Management Policy (evidence 002).</p> <p>The Records Manager (see Element 2) has records management recognised as a key task in her Job Profile (evidence 003). The Records Manager has also attended various events run by the Keeper's Assessment Team on the Public Records (Scotland) Act 2011 and has achieved a Practitioner's Certificate in Data Protection.</p> <p>The RMP states that all staff have access to both Clackmannanshire and Falkirk Councils' online training. The modules staff are required to complete include Information Security Awareness and Records Management. A screenshot has been supplied showing how staff have access to the Records Management module (evidence 031). All staff are also required to complete the Civil Service Learning</p>

			<p>Module Protecting Information – Level 1. A sample completion certificate has been submitted (evidence 032).</p> <p>The RMP also states that specific training on the Public Records (Scotland) Act 2011 will be developed and delivered by the Records Manager to all staff. The Keeper would be interested to see a sample of this training material once it has been developed.</p> <p>CSVJB has also developed a Records Management Guidance Note (evidence 038) which will be included in the induction packs for all new staff.</p> <p>The Keeper agrees that CSVJB recognises the importance of records management and provides staff with access to relevant training.</p>
<p>13. Assessment and Review</p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>The RMP states that the RMP, the Records Management Policy and the Document Retention and Disposal Schedule are subject to CSVJB’s internal governance procedures and will be reviewed on an annual basis.</p> <p>The Management Team will be responsible for carrying out these reviews and progress or issues will be reported to the Board. The Management Team meets every six weeks and has records management as a standing item on the agenda of these meetings. The Management Team will assess the records management systems in place by: developing and implementing policies and procedures relating to the RMP and monitoring progress; monitoring projects relating to the RMP; scrutinising and reviewing the RMP and supporting strategies and policies, which will be led by the Assistant Assessor (see Element 2); approving the RMP and supporting strategies and policies.</p> <p>CSVJB is considering the possibility of forming an Information Governance Working Group in order to report to the Management Team on records management and Data Protection matters. The Keeper commends this consideration and requests</p>

			<p>that he is kept up-to-date with developments in this area.</p> <p>The Keeper agrees that CSVJB has measures in place to ensure that its RMP and supporting policies and procedures can be kept up-to-date.</p>
14. Shared Information	<b>G</b>	<b>G</b>	<p>The RMP states that in limited circumstances it shares information with other bodies. This sharing is governed by the Information Handling Policy (evidence 016).</p> <p>CSVJB has a number of Data Sharing Agreements in place with the Councils in its jurisdiction (Falkirk, Stirling and Clackmannanshire) relating to the sharing of education records (evidence 034-036). These agreements make provision for the secure sharing of data and also the governance of that data at the conclusion of the agreement.</p> <p>CSVJB has also entered into a Data Sharing Agreement with the University of Stirling relating to the sharing of electoral information (evidence 037).</p> <p>The Keeper agrees that CSVJB has arrangements in place to securely share information with other bodies.</p>

## 6. Keeper’s Summary

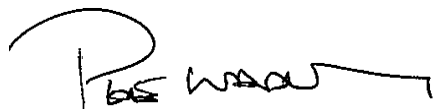
Elements 1-14 that the Keeper considers should be in a public authority records management plan have been properly considered by Central Scotland Valuation Joint Board. Policies and governance structures are in place to implement the actions required by the plan.

## 7. Keeper's Determination

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

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

A handwritten signature in cursive script that reads "Laura M. Mitchell". The signature is written in black ink on a light-colored background.

.....  
**Laura Mitchell**  
Deputy Keeper of the Records of Scotland