National Records of Scotland

Public Records (Scotland) Act 2011

Argyll and Bute Council and Licensing Board Assessment Report

The Keeper of the Records of Scotland

24 March 2017

Contents

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 Argyll and Bute Council and Licensing Board by the Public Records (Scotland) Act 2011 Assessment Team following its submission to the Keeper on 13 May 2016**.**

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

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

3. Authority Background

Argyll and Bute Council is both one of 32 unitary authority council areas and a Lieutenancy area. The administrative centre for the council area is located in Lochgilphead. The present council area was created in 1996, when it was carved out of the Strathclyde region, which was a two-tier local government region of 19 districts, created in 1975. Argyll and Bute merged the existing Argyll and Bute district and one ward of the Dumbarton district.

The Argyll and Bute Licensing Board is a separate statutory body from Argyll and Bute Council. The Board is supported by a Clerk who gives administrative support and professional advice. The Clerk to the Board is Argyll and Bute Council's Head of Governance and Law. The Argyll and Bute Licensing Board is made up of 7 elected members of Argyll and Bute Council, who are appointed to the Board by Argyll and Bute Council. The Licensing Board administers all licensed premises within the electoral boundaries of the area. It deals with applications for premises licenses as well as additional applications for Variations and Occasional Extension/Licences etc under the Licensing (Scotland) Act 2005. The Board also deals with applications for permissions under the Gambling Act 2005.

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 Argyll and Bute Council and Licensing Board's RMP was developed with proper regard to the elements of the Model Plan and is compliant with the Act. The assessment also considered whether there was sufficient supporting evidence of such compliance.

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.

5. Model Plan Elements: Checklist

Element	Present	Evidence	Notes
1. Senior Officer *Compulsory element*	G	G	The Records Management Plan (RMP) identifies Douglas Hendry, Executive Director of Customer Services, as having senior responsibility for records management within the Council. This appointment is confirmed in a covering letter from Mr Hendry (Appendix 2). The covering letter also outlines Mr Hendry's and the Strategic Management Team's support for ensuring the delivery of the requirements of the RMP and the accompanying Records Management Development Plan (Appendix 1). The Keeper welcomes this commitment.

			Mr Hendry is also the Council's Senior Information Asset Owner (SIRO). Argyll and Bute Licensing Board have identified Charles Reppke, Clerk to the Board, as having senior responsibility for records management within the Licensing Board. This is confirmed in a letter from Mr Reppke (Appendix 3) which also states that as the Board's records are held and managed by the Council it will follow the provisions of the Council's RMP. A joint plan covering separately scheduled authorities is permitted by the Public Records (Scotland) Act 2011 (PRSA). The Keeper agrees that appropriate individuals have been identified to take senior management responsibility for records management within both the Council and Licensing Board, as required by the PRSA.
2. Records Manager *Compulsory element*	**G**	**G**	The RMP identifies Iain Jackson, Governance and Risk Manager, as having operation responsibility for records management within the Council. This appointment is confirmed in the letter from the Executive Director of Customer Services (see Element 1). The Governance and Risk Manager's responsibilities are also described in the Records Management Policy (Appendix 6). Also submitted as evidence is Mr Jackson's Job Description (Appendix 4). Item 24 of his main functions shows that Mr Jackson has responsibility for developing and implementing records management policies and procedures within the Council. Other objectives include responsibilities for information security, Data Protection and Freedom of Information. Mr Jackson is also the Chair of the Information Security Forum. The Terms of Reference for the Forum have been submitted as Appendix 4a, showing that it is responsible for the development and implementation of a Council-wide Information Security Management System. The Forum reports Information Security issues to the

			Strategic Management Team, shown in the minutes of a meeting held on 27 June 2011. The Keeper agrees that an appropriate individual has been named to take day-to-day responsibility for records management as required by the PRSA.
3. Policy *Compulsory element*	**G**	**G**	The RMP states that the Council has a high-level Information Management Strategy 2014-2018 which describes the strategic framework for the management of the Council's information and records. The Strategy has been submitted as evidence (Appendix 5) and describes the Council's Information Management Programme which is designed to embed information management into the day-to-day work of the Council. To implement this Programme, an Information Management Working Group has been constituted, chaired by the Information Manager. The Council has also submitted its Records Management Policy, version 1.1, dated January 2017 (Appendix 6). The Policy contains a statement from the Executive Director of Customer Services (see Element 1) showing the Council's recognition of the importance of records management and commitment to achieving best practice. The Policy outlines the responsibilities for complying with records management requirements and states that a series of Records Management Champions will be created across all departments and will act as a local point of contact for records management issues. The Council has submitted screenshots from its Intranet 'The Hub' (Appendix C) which contains a section providing staff with guidance and advice on managing records and information, including sections on the Freedom of Information (Scotland) Act 2002 and the Data Protection Act 1998. This includes a link to the Records Management Policy. The Policy is supported by a range of guidance documents including Managing Our Records Effectively (submitted as Appendix 7) and Version Control and Document Naming.

			The Council have also developed a Managing and Archiving Email Messages Policy (Appendix 6A) which provides guidance for staff when business information is sent and received by email. The Keeper agrees that the Council has a Policy which outlines its commitment to achieving best practice records management and is available to staff so that they are aware of their responsibilities.
4. Business Classification	**A**	**G**	As part of the implementation of the Information Management Strategy, the Council is in the process of developing individual service area Information Asset Registers (IARs). The individual service areas are responsible for compiling their information assets, using a template based on the Local Government Classification Scheme (LGCS). A sample IAR has been submitted as evidence (Appendix 8A). Using the three level functional system set out in the LGCS the IARs will also have retention decisions included. These will be based on the Scottish Council on Archives Records Retention Schedules (SCARRS). The Keeper recognises that both the LGCS and SCARRS are appropriate for use by the Council. As part of the Corporate Information Management Programme the Council has produced a Planning and Implementing a Council-wide Information Asset Register document (Appendix 8). This provides guidance for completing the template. It is anticipated that each service are will have a Records Management Champion who will be responsible for the completion and maintenance of the IARs. An outline of this role has been provided (Appendix 8B). The Keeper commends the involvement of service areas in the development of its IARs as this will lead to a more robust business tool. **The Council is currently considering whether to use an Electronic Document and Records Management System (EDRMS) to manage its unstructured electronic information or to use the IARs as a framework to develop a file structure within the shared drives. The Council are running a pilot on the**

			implementation of a hybrid on-premise and cloud based SharePoint solution as an EDRMS. The initial assessment of the pilot is anticipated to be completed by August 2017. This will then be compared against a manual solution using the IARs to impose a structure on the shared drives. The Council has committed to updating the Keeper as the project moves forward. 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 organisation-wide method of classifying the records and information it creates and manages) and has identified possible solutions. This agreement is conditional on the understanding that the Keeper is provided with further details on how the Council aims to close this gap in provision (when it has decided which method to use), backed up by evidence of senior management commitment and the proposed timescales for completion. The Keeper will additionally need to be provided with regular updates on the progress of work in this area.
5. Retention schedule	**A**	**G**	The development of corporate retention schedules is tied in with the development of IARs (see Element 4). Retention and disposal information will be added to the IARs and will be based on the SCARRS model. At present where a service area doesn't have a finalised IAR, the SCARRS template is used to provide guidance on retention periods. The RMP states that the Strategic Management Team has agreed to take responsibility for the IARs to ensure that they are kept up to date and retention actions applied at the appropriate times. Screenshots from the Council's SharePoint system (Appendix D) have been supplied showing that a sample IAR for Governance and Law is available for staff to access. Not all staff currently have access to these but the Council is investigating how best to ensure that this happens. Every service area has

	A	**G**	completed their draft IARs with a view to having these finalised by the end of March 2017. Training around retention periods will be provided as part of the Implementation Plan (DP.12.02 of Appendix 1). 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 organisation-wide retention schedule) and has identified a solution (the development of IARs which include retention information). This agreement is conditional on the understanding that the Keeper is provided with regular updates on progress of this work.
6. Destruction Arrangements *Compulsory element*	**A**	**G**	The Council has outlined the following destruction arrangements in its RMP: **Paper** – The RMP states that wherever possible, confidential waste is destroyed in suitable cross-cutting on-site shredders. Due to the diverse geographical spread of its offices the Council engages several confidential waste disposal providers (Shanks and Shred-It). Shanks do not provide destruction certificates but Shred-It do and in response to the Keeper's Interim Report a sample destruction certificate (Appendix 10a) from Shred-It has been provided showing that the procedures for disposing of paper confidential waste are operational. **To consolidate the arrangements in place for the destruction of confidential paper waste the Council has constituted a project team to investigate the current provision. This work will continue through 2017 and the Council has committed to updating the Keeper with progress.** The current procedures are described in the Disposal of Records guidance document (Appendix 9). A flowchart of the required steps is included as Appendix 1. Appendix 2 is a Records Destruction Authorisation form which needs to be signed prior to destruction taking place and which also acts as a record of the disposal of

records. The RMP states that this is available to staff on the Council's intranet. Appendix C is a screenshot of where this sits

The process for ordering sacks for disposal of confidential waste and also the uplift of these sacks is outlined in Appendix 10. Non-confidential waste is disposed of by recycling.

Electronic – **The RMP acknowledges that this is an area that requires development and it is included in the Records Management Development Plan (Appendix 1) as a distinct action (DP07.02). This is tied in to the identification of local records management champions who, it is assumed by the Keeper, would be responsible for carrying out the destruction. The Keeper also appreciates the difficulties in ensuring that electronic records are disposed of appropriately according to the retention schedules and requests that he is kept informed on whether the Council decides to implement an EDRMS or Structured Drives.**

Hardware – The Council has in place a contract with a commercial provider (Arrow) for the secure destruction of obsolete hardware. This destruction and data removal takes place to relevant industry standards. Sample certificates have been supplied as evidence that procedures are operational (Appendix 11).

Backups – The RMP states that backups of records stored on network file servers and EDWMS/case management systems are backed up nightly and stored for an agreed period of time before being overwritten. The Council has submitted a document outlining its ICT Backup Procedures (Appendix 11a). The Council operates a fully incremental back-up procedure. Exchange server backups are taken daily with full database back-up on a Saturday and are retained for 30 days. All other servers are backed up daily from Monday to Friday and are retained for 90 days or up to 90 versions. Unix servers are backed up on a different schedule and

			quarterly tapes are retained permanently. **The Keeper can agree this Element on an 'improvement model' basis. This means that the Council has identified a gap in provision (lack of organisation-wide ability to consistently destroy electronic records when required). The Council is currently considering how best to close this gap. The Keeper requests that he is kept informed of the method chosen by the Council to enable systemic deletion of electronic records in line with the retention schedules.**
7. Archiving and Transfer *Compulsory element*	**G**	**G**	The Council has its own archive which collects, preserves and makes available records relating to the Argyll and Bute Area. As well as Council records, it archives records relating to other local organisations, business and families. Submitted as evidence is a Central Archives Procedure (Appendix 12) which sets out the arrangements in place for transferring records selected for permanent preservation to the archives. The Procedure also describes the archive's collecting policy and how it intends to ensure the preservation of records. The RMP states that some of its archives and those of its predecessor organisations are held by Glasgow City Archives at the Mitchell Library. Services within the Council which have identified records for permanent preservation and which meet the collection criteria of the Archive are transferred under the arrangements set out in the Central Archives Procedures. Some services within the Council need to retain records for up to 100 years. These records are not transferred to the Archives but are stored securely in these local service areas. The Records Management Development Plan contains an action to formalise the existing processes and produce guidance for staff to differentiate between the procedures for archiving and those for storing records with longer retention periods. The RMP also states that the Council archive is currently considering the purchase of a digital repository which would allow it to receive transfers of electronic records

			selected for permanent preservation. The Council Archivist has been in touch with the National Records of Scotland to investigate digital repository solutions. The Keeper commends the consideration of this important area of recordkeeping as this is likely to grow increasingly important in the coming years. The Keeper agrees that that there are procedures in place to transfer records selected for permanent preservation to an appropriate archive.
8. Information Security *Compulsory element*	G	G	All Council employees, including third parties who require access to the Council's network and systems, are required to read and accept the requirements of the ICT Acceptable Use Policy (Appendix 15). The Policy provides staff with information on passwords, email and internet use, social media and mobile phone use. The staff member is required to sign that they have understood and agree to abide by the provisions in the Policy. The Council is a member of the Public Services Network (PSN) which allows it to connect securely with other certified bodies. The Council abides by the PSN Code of Conduct. The Council has submitted its Information Security Policy (Appendix 14). The Policy sets out its scope responsibilities for compliance and the Council's corporate approach for ensuring the security of its systems. Also submitted as evidence is the Council's Practical Information Security and Data Protection Handbook, version 1.3 (Appendix 14). This was designed primarily for staff dealing primarily with information security and Data Protection but also serves as a useful point of reference for all staff to achieve best practice information security and Data Protection. The Keeper commends the creation of this useful tool for staff. A screenshot (Appendix C) has been provided showing that the Handbook is available to all staff on the Council's Intranet.

			The Council has also outlined its physical security arrangements. The RMP states that access to all Council offices is controlled either by a reception desk where visitors are required to sign in and out or by access codes and key fobs. Additionally the Council has submitted its Use of Space Policy (Appendix 14a) which emphasises the need for a Clear Desk Policy and for maintaining the security of confidential paper records. This Policy is available to all staff on the Council's Intranet and a screenshot has been supplied evidencing this (Appendix 14b). The Keeper agrees that there are appropriate measures in place to protect the information that the Council creates and manages.
9. Data Protection	**G**	**G**	The Council and the Licensing Board are separately registered and Data Controllers with the Information Commissioner's Office (Council's registration number: Z5909574, Licensing Board's registration number: ZA171116). The Council has submitted its Data Protection Policy (Appendix 16). The Head of Governance and Law is the Council's nominated Data Protection Officer who is responsible for notifying the Information Commissioner's Office of data processing carried out by the Council and for co-ordinating and processing Subject Access Requests (SARs). A screenshot of the Council's Access to Information page (Appendix C) has been submitted which shows that staff have access to the Data Protection Policy and the Subject Access Requests Policy. The Policy contains a section on Data Handling which outlines the procedures for handling both electronic and paper records. It also contains a commitment to providing staff with training on induction and as part of an e-learning system (LEON). The Policy also states that the Council has an Information Security Forum which comprises representatives from each Department.

			Also submitted as evidence is the Council's Subject Access Requests Policy (Appendix 17) which governs how to process and respond to SARs. SAR information is also available on the Council's website. The Keeper commends this approach towards providing stakeholders with the necessary information for submitting requests for personal information. The RMP mentions the LEON employee training module. A screenshot of the system has been provided showing that it contains a distinct stream of training relating to Data Protection (Appendix 21). The RMP refers to annual Data Protection training for all areas of the Council. A presentation about Data Protection delivered to the Debt Recovery Team (Appendix E) has been supplied. The Keeper agrees that the Council is aware of its responsibilities under the Data Protection Act 1998 and that staff have access to relevant training and policies.
10. Business Continuity and Vital Records	**A**	**G**	The RMP states that there are Critical Activity Recovery Plans (CARPs) in place for the essential services provided by the Council. These include a section where the person responsible for the CARP must identify the electronic and paper records and information that are essential for the operation of the service. A sample CARP for the Election service has been submitted as evidence (Appendix 18). **The Records Management Development Plan (Appendix 1) contains a commitment to identify vital records as part of the work to develop IARs across the organisation. Once work to develop IARs has been completed a separate vital records register will be created. This project has an estimated completion date of April 2018. The Keeper requests that he is kept informed of the progress of this project.** **The Keeper can agree this Element on an 'improvement model' basis. This**

	A	**G**	**means that the authority has identified a gap in provision (vital records across the Council have not been identified) and has shown a commitment to closing this gap. This agreement is conditional upon the Keeper being kept updated as the project moves forward.**
11. Audit trail	**A**	**G**	The RMP states that the Council uses a number of bespoke case/document management systems across a number of business areas within the organisation to carry out its functions. These systems provide audit trails for the records created and managed within them. In addition, the Council uses a number of SharePoint sites which also have an element of audit trail functionality built in. Examples of the audit trail provisions have been provided as screenshots (Appendix 20). **The RMP states that the majority of unstructured records and information within the Council is managed using a shared drive system. The Council recognises that improvements are required in the management of record in shared drives and has identified two possible solutions. One involves the development of a Council-wide Electronic Document and Records Management System (EDRMS) and the investigation of this possibility is built into the Records Management Development Plan (Appendix 1). The alternative solution is to create a file structure across the shared drives and use this to impose control over the unstructured data currently stored within these. The Keeper will not have an issue with whatever solution is chosen by the Council (this must remain a business decision by the authority) but he requests that he is provided with details of how it intends to implement the solution and the timescales around this, as well as evidence of senior management commitment to whichever solution is chosen.** The Council has also produced detailed guidance on Document Naming and Version Control (Appendix 19). Staff will be given training and encouraged to use the guidance. The Keeper commends the creation of this very useful document and the commitment to ensuring staff are provided with training in its use.

			The Council maintains an auditable record of the destruction of information and records in accordance with its retention schedules. **The RMP states that the vast majority of records created and used by the Council are electronic. A sample of one of the methods in place to track paper files in the Social Work department has been provided as evidence (Appendix F). The response states that there are similar arrangements in place across different departments. An action has been added to the Records Management Development Plan (D.P.11.02) to review current practice and to produce a standardised template for tracking paper records and guidance. This has an estimated completion date of June 2017.** **The Keeper can agree this Element on an 'improvement model' basis. This means that the authority has identified a gap in provision (lack of standardised audit trail provision for paper records) and has identified and evidenced how it intends to close this gap. The Keeper requests that he is kept informed of the progress of this work.**
12. Competency Framework for records management staff	**G**	**G**	The Council's Governance and Risk Manager has day-to-day responsibility for records management and this is clearly reflected in his job description which has been submitted as evidence (Appendix 4). The RMP states that he is able to access relevant training and is able to share good practice with colleagues in the appropriate forums. The RMP states that the Council utilises a performance review and development (PRD) system. This is based on a competency framework which describes the skills and competencies required throughout the organisation. The Records Management Development Plan (Appendix 1) shows that the inclusion of a competency on records management is being considered for inclusion in the framework for all staff. The Keeper commends this approach and requests that he is kept informed of

			developments.
			Staff have access to online training through the LEON system. This includes modules on Data Protection and Freedom of Information. A screenshot of the system has been provided (Appendix 21). The RMP states that the inclusion of a records management module will be considered for inclusion in the training package. The Keeper commends this approach and requests that he is kept informed of developments.
			Also submitted as evidence is the Governance and Risk Team Action Plan 2016-17 (Appendix 22). This shows that one of the objectives is to begin the delivery of annual training in records management and Data Protection by 31 March 2017. The Keeper commends this commitment to providing all staff with training in records management.
			The Keeper agrees that the individual identified in Element 2 has the necessary skills and access to training to fulfil this role and that there is evidence of the commitment to provide training to staff.
13. Assessment and Review	**G**	**G**	The Council's Internal Audit Team will carry out an implementation audit within a year of the RMP being agreed by the Keeper. This agreement with the Chief Internal Auditor is confirmed in an email (Appendix 23). This will determine whether the RMP is operating as expected. Following this initial audit, on an annual basis the Governance and Risk Manager (see Element 2), with the assistance of the Internal Audit Team, will carry out an audit of three Elements out of Elements 4-12. These Elements will be prioritised on the level of risk identified. Any issues identified will be subject to a follow up review. Anything which changes the RMP as a result of audit or review will be reported to the Keeper. The Governance and Law Team Action Plan (Appendix 22) includes an objective to audit at least two Elements annually starting prior to the end of 2017. The Keeper commends the use of internal auditors in assessing compliance with an authority's RMP.

			The Council has also submitted the Internal Audit Customer Handbook (Appendix 23a). This details the procedures followed by the internal auditors, in particular those for reporting the results of the audit. The Final Audit report is sent to the Chief Executive, the relevant Executive Directors, Head of Strategic Finance and Audit Scotland. Reports are also submitted to the Audit Committee on a quarterly basis. Actions from these reports are added to the follow-up database and reports on these actions are provided to the Senior Management Team and Audit Committee quarterly. The Keeper agrees that there are arrangements in place to ensure that the RMP and supporting documents are kept up-to-date.
14. Shared Information	**G**	**G**	Prior to entering into a Data Sharing Agreement the Council conducts a Privacy Impact Assessment (PIA) based on the Information Commissioner's Data Sharing Code of Practice. Submitted as evidence under this Element are a sample Information Sharing Protocol between the Council and NHS Highland (Appendix 24) and a Data Sharing Agreement between Oban High School and Sequential Systems (Appendix 24A). These documents contain relevant sections on information security and information governance. The guide for conducting PIAs has also been supplied (Appendix 25). Outcome 3 of the Information Management Strategy (Appendix 5) recognises the benefits that can be gained from sharing information securely. The Keeper agrees that the Council appropriately considers the security and governance issues surrounding the sharing of information.
15. Contractors	**G**	**G**	The Council has added an additional Element to deal with the records management obligations of contractors when carrying out functions of the Council on their behalf. The Keeper commends this method of tailoring the RMP to develop a stronger

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The Council intends to use the wording developed by the Society of Local Authority Lawyers and Administrators in Scotland (SOLAR) which can be found on the website of the Scottish Council on Archives (SCA). These contain clauses which can be used in Pre-Qualification Questionnaires, Invitations to Tender and Contracts. The Council will also use the Guidelines for Contractors document, also found on the SCA website, when entering into a new contract with a third party supplier. Examples where these are used have been submitted as Appendices 26 and 27.

The Keeper agrees that the Council has considered the records management responsibilities of third parties carrying out functions on its behalf.</td></tr>
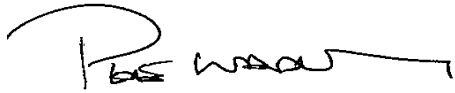</table>

6. Keeper's Summary

Elements 1-15 that the Keeper considers should be in a public authority records management plan have been properly considered by Argyll and Bute Council and Licensing Board. Policies and governance structures are in place to implement the actions required by the plan.

7. Keeper's Determination

Based on the assessment process detailed above, the Keeper agrees the RMP of Argyll and Bute Council and Licensing Board.

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

Assessment Report

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

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Pete Wadley
Public Records Officer

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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 Argyll and Bute Council and Licensing Board. In agreeing this RMP, the Keeper expects Argyll and Bute Council and Licensing Board 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