SUBMISSION FROM THE ASSOCIATION OF CHIEF POLICE OFFICERS IN SCOTLAND

1. The Association Of Chief Police Officers In Scotland (ACPOS) Records Management Group provided detailed comment on the consultation paper previously released by the Keeper of the Records of Scotland on behalf of Scottish Ministers. In their response to the consultation, the Group provided answers to 22 direct questions outlining the principles of the proposed legislation.

2. In their response, dated 3 August 2010, members of the Group expressed their favourable opinion towards the principal features which are set out in the Bill, including the development of model records management plans by the Keeper, the requirement for public authorities to produce records management plans following the model, the instigation of a compliance regime under the oversight of the Keeper, the use of proportionate sanctions, and the extension of the bill to cover private organisations delivering services on behalf of a public authority.

3. Members of the ACPOS Records Managers Group are of the opinion that the principal concerns raised in their previous response are taken account of in the Bill. These include the range of public authorities subject to the legislation and the role of peer review. Consequently, the Group are in broad agreement with the principles of the Bill.

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