1. Strathclyde Partnership for Transport (SPT) recognises the benefits of a good records management system and supports the use of existing guidance and best practice. However, as a relatively small organisation with no in-house archivist or records management staff, we consider that the proposed new statutory obligation to produce and implement a Records Management Plan would require significant in-house resources and expenditure on employing consultants with relevant experience, compounding the financial difficulties faced by SPT (and all public bodies) at this time.

2. Given that SPT’s records management practices are already subject to the statutory code of practice made under section 61 of the Freedom of Information (Scotland) Act 2002 and our records management systems are subject to inspection by the Scottish Information Commissioner (under freedom of information legislation and the (UK) Information Commissioner (under data protection legislation), we further consider that the costs of compliance with the additional obligations contained in the Bill are disproportionate to any benefits which might result.

3. We strongly recommend that any new legislative requirements and compliance regime should be consistent with, and not duplicate, existing obligations on public bodies.

Valerie Davidson
Assistant Chief Executive (Business Support)
25 November 2010