1. As Police Complaints Commissioner for Scotland (PCCS), my organisation will be affected by the Public Records (Scotland) Bill. My organisation understands the importance of having in place a robust records management policy that ensures that public records are held, managed and destroyed in a secure and systematic way. The PCCS has in place a Records Management policy which covers procedures for the management, security, archiving and destruction of information.

2. I support the principles of the Bill, which complement existing legislation and place a duty on public authorities to produce records management plans in line with the model records management plan produced by the Keeper. In my view, the production of a model plan will lead to standardisation in the way in which public authorities manage their records which in turn will ensure an accurate audit trail of all actions taken by public authorities.

3. The PCCS also recognises the importance of joint working in this current economic climate and I welcome the proposal for joint record management plans to be developed by groups of authorities holding similar records. While the practicalities of such an arrangement will require careful investigation and testing prior to implementation it should be given consideration.

4. Moreover, the Keeper’s role of scrutinising public authorities’ records management plans and making recommendations for improvement will ensure a high standard of record keeping across the public sector and will act as an effective method to achieve compliance and a powerful learning tool.

5. In reference to the specific questions asked:

   How helpful do you find the policy memorandum and financial memorandum accompanying the Bill?

6. Yes. The policy memorandum and financial memorandum clearly set out the background to the bill and arguments for the introduction of new legislation.

   Do you have any comments on the consultation the Scottish Government carried out prior to the introduction of the Bill?

7. No further comments.

   Professor John McNeill
   Commissioner
   26 November 2010