

Public Records (Scotland) Act 2011

Aberdeen City Integration Joint Board

The Keeper of the Records of Scotland

7th June 2021

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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 Aberdeen City Integration Joint Board by the Public Records (Scotland) Act 2011 Assessment Team following its submission to the Keeper on 20th October 2020.

The assessment considered whether the RMP of Aberdeen City Integration 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 Aberdeen City Integration Joint Board complies with the Act can be found under section 7 of this report with relevant recommendations.

3. Authority Background

The Integration Joint Board (IJB) is a joint board of Aberdeen City Council and NHS Grampian. It oversees the Health and Social Care Partnership (AHSCP) for the City of Aberdeen. The IJB manage adult Social Care and Health services in Aberdeen.

[Committee details - Integration Joint Board \(aberdeencity.gov.uk\)](http://aberdeencity.gov.uk)

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 Aberdeen City Integration Joint 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.
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5. Model Plan Elements: Checklist

Aberdeen City Integration Joint Board (‘The IJB’ in the assessment below)

Explanation: All public records of the Aberdeen City Integration Joint Board are held on Aberdeen City Council systems and, as this is the case, the IJB must adopt the records management provision of the Council. This is made clear in the *Records Management Plan* (for example under element 3) and in a *Memorandum of Understanding* signed by the Chief Officer of the IJB and the Team Leader, Legal Services, Aberdeen City Council, a copy of which has been provided to the Keeper.

“The parties to this agreement confirm that all records of the IJB will be held by the Council on behalf of the IJB. All records of the IJB will be subject under the terms of this agreement to all relevant policies and procedures of the Council applying to records management functions and together with any relevant data sharing agreements. The Council agrees that it will manage records held on behalf of the IJB in line with the Council’s Records Management Plan.” (*Memorandum of Understanding*).

The Keeper agreed the *Records Management Plan (RMP)* of Aberdeen City Council in January 2015:

<https://www.nrscotland.gov.uk/files//record-keeping/public-records-act/keepers-assessment-report-aberdeen-city-council.pdf>

In 2020 Aberdeen City Council provided the Keeper with an update on their *RMP*: <https://www.nrscotland.gov.uk/files//record-keeping/public-records-act/nrs-progress-update-review-final-report-for-aberdeen-city-council-may-2020.pdf>

Element	Present	Evidence	Notes
1. Senior Officer	G	G	<p>Aberdeen City Integration Joint Board (the IJB) has identified Sandra MacLeod, Chief Officer, as the individual with overall responsibility for records management in the authority.</p> <p>This is confirmed by a <i>Covering Letter</i> from the Chief Officer.</p> <p>It is further confirmed by the IJB's <i>Records Management Policy</i> (section 7 Roles & Responsibilities) – See element 3.</p> <p>The Chief Officer is the Senior Information Risk Owner (SIRO) in the authority.</p> <p>The Chief Officer is the Corporate Owner of the <i>Plan</i>.</p> <p>The Keeper agrees that Aberdeen City Integration Joint Board have identified an appropriate individual to this role as required by the Public Records (Scotland) Act 2011 (the Act).</p>
2. Records Manager	G	G	<p>The Act requires that each authority identifies an individual staff member who has operational responsibility for records management and who has appropriate skills, corporate responsibility and access to resources.</p> <p>Aberdeen City Integration Joint Board have identified Martin Allan, Aberdeen City HSCP's Business Manager, as the individual with day-to-day responsibility for implementing the <i>Records Management Plan</i> (the <i>Plan</i>) in the authority.</p>

			<p>The appointment of the Business Manager to this role is confirmed the IJB’s <i>Records Management Policy</i> (section 7 Roles & Responsibilities) – See element 3.</p> <p>The IJB have confirmed that the Business Manager (Mr Allan) has undertaken the necessary mandatory information governance training. Information governance is also referenced in the job description for the Business Manager post. They have also confirmed that he has access to the Council's Records Manager for advice when appropriate. In 2015 the Keeper agreed that Aberdeen City Council had provided their Records Manager, Caroline Anderson, with suitable resource, responsibility and information governance skills to manage the day-to-day implementation of the Council’s <i>Records Management Plan</i>. As all the public records of the IJB are held on the Council systems it is welcome that the IJB Business Manager has access to Ms Anderson’s expertise if needed.</p> <p>The Keeper agrees that Aberdeen City Integration Joint Board have identified a suitable individual to this element as required by the Act.</p>
3. Policy	G	G	<p>The Act requires an authority to have an appropriate policy statement on records management.</p> <p>Although the public records of the IJB are managed on the systems of Aberdeen City Council, the IJB has chosen to operate a bespoke <i>Records Management Policy</i> distinct from that of the Council.</p> <p>The IJB have provided the Keeper with a copy of their <i>Records Management Policy</i>. This is dated 21st July 2020. The Keeper has compared this policy with that of the Council and agrees that nothing is contradictory.</p> <p>The <i>Policy</i> supports the arrangement by which the public records of the IJB are</p>

			<p>managed on the systems of the Council: “The IJB business records categories ... are exclusively electronic in nature and are managed through Aberdeen City Council’s records management policies and protocols. To support this, a Memorandum of Understanding has been documented and signed by the relevant parties from the Council and the IJB.” (<i>Records Management Policy</i> section 10 Management). The Keeper has been provided with a copy of the <i>Memorandum of Understanding</i>.</p> <p>The Keeper agrees that Aberdeen City Integration Joint Board has a records management policy statement as required by the Act.</p>
<p>4. Business Classification</p>	<p>A</p>	<p>G</p>	<p>The Keeper of the Records of Scotland (the Keeper) expects that the public records of an authority are known and are identified within a structure.</p> <p>It has been determined that all IJB records are held electronically (See element 3 above).</p> <p>Although the public records of the IJB are held on the records management systems of Aberdeen City Council, the IJB has created a separate business classification scheme and file plan covering their records. Copies of these documents have been provided to the Keeper.</p> <p>The <i>Business Classification Scheme</i> is a four level structure based on function. For example Governance/Decision Making/Committee Meetings/Agendas. This arrangement must remain a business decision for the authority. However, the Keeper acknowledges that a functional system, as demonstrated in the IJB’s <i>Scheme</i>, is currently considered best practice. The <i>Business Classification Scheme</i> includes staff guidance on the arrangement and purpose of the document.</p> <p>The Keeper has been provided with a minute of the meeting of the IJB dated 8th</p>

			<p>September 2020 at which the Board approved the <i>Business Classification Scheme: Agenda for Integration Joint Board on Tuesday, 8th September, 2020, 10.00 am</i> (aberdeencity.gov.uk)</p> <p>The <i>File Plan</i> is designed to expand the <i>Business Classification Scheme</i> to include retention information and information on the systems on which the records are managed (shared drives, business system management system etc.). This is potentially a useful business tool for the authority. However, the IJB have confirmed to the Keeper that the File Plan is not yet complete.</p> <p>Aberdeen City Council is currently consolidating their records management provision around an O365 cloud solution. It is assumed that the public records of the IJB will transition alongside the record of the Council. The <i>File Plan</i> column 'location' will then require to be changed. IJB records will no longer be held on shared drives for example. Some IJB records may remain outside the principle records management solution. For example on Council 'line-of-business' systems such as "ACC's Committee Services Management Programme".</p> <p>The Keeper has determined that the RAG status of a <i>Records Management Plan</i> of any authority, whose records are managed on the systems of a separate authority, cannot be higher than that awarded to the 'host' authority. As noted above, Aberdeen City Council is in a transition period and carries an amber status against this element.</p> <p>Therefore, the Keeper can agree element 4 on the same 'improvement model' terms as the Council.</p>
5. Retention schedule	A	G	The Keeper expects an authority to have allocated retention periods to its public records and for those records to be retained and disposed of in accordance with a

			<p>retention schedule.</p> <p>All the public records of the IJB are held on Aberdeen Council systems, which (as detailed under element 4 above) are currently being transitioned to an O365 solution. The Keeper has agreed the Council’s <i>Records Management Plan</i> on an ‘improvement model’ basis for this element as the operation of retention labels against record type has not been finalised in the new system.</p> <p>The Keeper notes that the IJB <i>File Plan</i> has appropriate retention decisions allocated to IJB public records. However, see element 4 regarding the completeness of the <i>File Plan</i>.</p> <p>The IJB have provided the Keeper with a screen-shot from the Council’s Retention Schedule showing that their public records are included.</p> <p>In January 2015, The Keeper agreed this element of Aberdeen City Council’s plan. However, he did so under ‘improvement model’ terms. This was in recognition of a major change in the record keeping systems at the Council (see element 4 above).</p> <p>The Keeper therefore agrees this element of the IJB <i>Plan</i> under the same improvement model terms as the ‘host’ authority.</p>
6. Destruction Arrangements	G	G	<p>The Act requires that public records are destroyed in a timely, controlled and secure manner.</p> <p>This is recognised in the <i>Records Management Policy</i> (see element 3) and in the <i>Memorandum of Understanding</i> signed by the Chief Officer of the IJB and the Team Leader, Legal Services, Aberdeen City Council, a copy of which has been provided to the Keeper.</p>

			<p>For example, the <i>Policy</i> states (section 11): “No IJB record may be destroyed without appropriate authorisation and due regard to both legal obligations. All destructions of IJB records must be logged by the disposing business unit. This log must be kept for no less than 20 years on a rolling basis.</p> <ul style="list-style-type: none"> • Primary IJB records: must never be destroyed – they will be held permanently. • Secondary IJB records: must be destroyed securely, in compliance with the hosting organisation procedures. <p>The Keeper has already agreed that the ‘hosting organisation’ (Aberdeen City Council) has appropriate processes in place to destroy public records as required (January 2015, reconfirmed by PUR in 2020).</p> <p>The Keeper also commends the retention of destruction logs, although he suggests that consideration might be given to these holding simple destruction logs <u>permanently</u> rather than ‘not less than 20 years’.</p> <p>The Keeper can agree that Aberdeen City Integration Joint Board has arrangements in place to ensure the controlled, secure and irretrievable destruction of their public records when appropriate.</p>
7. Archiving and Transfer	G	G	<p>The Act requires that all Scottish public authorities identify a suitable repository for the permanent preservation of any records considered suitable for archiving. A formal arrangement for transfer to that repository must be in place.</p> <p>The <i>Records Management Policy</i> (see element 3) states that “We retain records that provide evidence of our functions, activities and transactions, for: Historical and Cultural Value – to protect and make available the corporate memory of the organisation to all stakeholders and for future generations.”</p>

			<p>The IJB <i>Business Classification Scheme</i> (see element 4) and the <i>Memorandum of Understanding</i> provides the framework in which IJB records will fall under the Council’s policy towards archiving and transfer. The Keeper agrees that the IJB has suitable input to archiving decisions through their <i>Classification Scheme</i>.</p> <p>In January 2015, the Keeper agreed that Aberdeen City Council’s archiving arrangements were appropriate for public records.</p> <p>Therefore the Keeper can agree that Aberdeen City Integration Joint Board have arrangements in place to ensure that those records selected for permanent preservation are properly transferred to a suitable repository.</p>
8. Information Security	G	G	<p>The Act requires that public records are held in accordance with information security compliance requirements.</p> <p>All public records of the IJB are held digitally on the records management systems of Aberdeen City Council. Therefore they are subject to the information security procedures of the Council.</p> <p>All staff managing IJB records are employees of Aberdeen City Council and are subject to the security policies of the Council.</p> <p>The <i>Plan</i> states “All staff that work with IJB records will remain employees of either Aberdeen City Council or <u>NHS Grampian</u>. As such they will be subject to the policies and procedures of their employer, i.e. Aberdeen City Council Information Security policies or NHS Grampian Information Security Policies.”</p> <p>This correctly identifies that any staff NHS staff accessing IJB public records for whatever reason will be bound by the security policies and disciplinary procedures</p>

			<p>of their NHS Board.</p> <p>The Keeper has already agreed that the information security procedures in Aberdeen City Council and in NHS Grampian are appropriate (January 2015 and September 2018 respectively).</p> <p>The Keeper can agree that Aberdeen City Integration Joint Board has arrangements in place that ensure the security of their public records as required by the Act.</p>
<p>9. Data Protection</p>	<p>A</p>	<p>G</p>	<p>The Keeper expects a Scottish public authority to manage records involving personal data in compliance with data protection law.</p> <p>Aberdeen City Integration Joint Board is a data controller. This is clearly stated in the <i>Memorandum of Understanding</i>.</p> <p>The IJB is currently working with its appointed Data Protection Officer (DPO) to ensure that they fulfil all the requirements of the Data Protection Act 2018 including registration with the Information Commissioner.</p> <p>The IJB adopts the Data protection Policy of Aberdeen City Council, which the Keeper has already agreed as appropriate (2015). However, the RMP, as submitted also includes, references to the data protection provision in NHS Grampian. The IJB has now committed to take out these references as they may cause confusion.</p> <p>The IJB have provided the Keeper with links to the relevant pages on the Council website. The Keeper suggests that these might also be linked from the HSCP page.</p> <p>The Keeper can agree this element of the Aberdeen City Integration Board's Records Management Plan under improvement model terms. This means that there</p>

			is an identified gap in provision, but the Keeper recognises that the IJB have put process in place (in conjunction with their DPO) to close that gap.
10. Business Continuity and Vital Records	G	G	<p>The Keeper expects that record recovery, prioritising vital records, is an integral part of the authority's business continuity planning.</p> <p>All the public records of Aberdeen City Integration Joint Board are held digitally on the records management systems of Aberdeen City Council. As such they must be recovered using the business continuity processes of the Council.</p> <p>The Keeper has already agreed that the business continuity procedures in Aberdeen City Council are appropriate (January 2015 reviewed by PUR in 2020).</p> <p>The IJB have listed records they identify as 'vital' in the <i>Plan</i>. Although reliant on the recovery processes of the Council, this identification is still useful for IJB staff. The Keeper notes that, as well as their own records, a copy of the Council's <i>Business Continuity Plan</i> is one of the IJB's 'vital' records. This is a sensible addition.</p> <p>The Keeper agrees that Aberdeen City Integration Joint Board have ensured that there are processes in place that should facilitate the recovery of their public records in the case of an emergency and, furthermore, that they are able to identify vital records as required.</p>
11. Audit trail	G	G	<p>The Keeper expects an authority to have process in place to track public records in such a way that their location is known and changes recorded.</p> <p>Aberdeen City Integration Joint Board recognise this and state as one of their principles "IJB records must be titled and referenced in a manner consistent and relevant to the business activity to ensure that they can be easily retrieved,</p>

			<p>understood and managed.” (<i>Records Management Policy</i> – see element 3 – section 4).</p> <p>The <i>Memorandum of Understanding</i> between the IJB and Aberdeen City Council states that “All records of the IJB will be subject under the terms of this agreement to all relevant policies and procedures of the Council applying to records management functions...”</p> <p>In 2015 the Keeper agreed that the Council had appropriate provision in place to locate and identify public records when required. This was reconfirmed in 2020 through the Progress Update Review (PUR) process. Although the Council is transitioning to a different records management solution (see element 4), the Keeper can agree that previous record tracking processes would remain operational until the new search facility was fully rolled out.</p> <p>The Keeper accepts that the public records of the IJB are subject to the same processes as those of the Council.</p> <p>Although the Keeper is confident that the actual <u>provision</u> in place is robust (because it is based on an agreed system operated by the Council), the text of the compliance statement in the <i>Plan</i> does not make this clear. The Keeper is pleased to report that the IJB have committed to rewriting the text of this section of their <i>Plan</i> at the time of the next review (see element 13).</p> <p>The Keeper agrees that Aberdeen City Integration Joint Board have appropriate processes in place to locate and identify their public records when required.</p>
12. Competency Framework	G	G	The Keeper expects staff creating, or otherwise processing records, to be appropriately trained and supported.

<p>for records management staff</p>			<p>Aberdeen City Integration Joint Board recognise this. The <i>Memorandum of Understanding</i> with Aberdeen City Council, signed by the Chief Officer, states that “It is agreed that it is the responsibility of the IJB to ensure its office holders and members will be kept up to date with the structure and procedures applying to management of its records by means of relevant training and information sessions.”</p> <p>Training of IJB members on records management and information governance will be undertaken at a workshop for members of the IJB in 2021 (date tbc). The training will be undertaken by both the IJB’s DPO and The Council’s Data Protection Officer (see element 9).</p> <p>The Keeper agrees that Aberdeen City Integration Joint Board has identified individuals for the day to day implementation of their <i>Records Management Plan</i> who have the requisite skills, responsibilities and training opportunities. Furthermore, he agrees that they have properly considered information governance training for other members of staff as appropriate.</p>
<p>13. Assessment and Review</p>	<p>G</p>	<p>G</p>	<p>Section 1(5)(i)(a) of the Act says that an authority must keep its RMP under review.</p> <p>There is a clear commitment to do this. The <i>Plan</i> states: “The IJB will undertake an annual review of the RMP which will be documented and recorded through the ACC Committee management process. Any proposed changes will also be reported through the ACC Information Governance Group to ensure all proposed changes are in accordance with ACC policies and procedures and that the Memorandum of Understanding is still validated.”</p> <p>The Business Manager (see element 2) will liaise with the Council so that the RMP can be Reviewed through Information Governance Group as well as being reported to the IJB.</p>

			<p>This is very important, as the public records of the IJB are managed on Council systems, the Council have committed to share the results of relevant reviews with the IJB. This is welcome. “The Council will keep the IJB informed as to any changes in its own records management arrangements and supporting policies, procedures and guidance.” (<i>Memorandum of Understanding</i>).</p> <p>The Keeper has agreed that the assessment and review procedures in the Council are appropriate (2015).</p> <p>The Keeper agrees that Aberdeen City Integration Joint Board have processes in place to ensure that their Records Management Plan, and records management provision generally are kept under review as required by the Act. This will be done both directly and by the partner authority on whose systems the public records of the IJB are managed.</p>
14. Shared Information	G	G	<p>The Keeper expects a Scottish public authority to ensure that information sharing, both within the Authority and with other bodies or individuals, is necessary, lawful and controlled.</p> <p>As part of its function an IJB must utilise the records of other partners and, therefore, information sharing is a key part of its business. In the case of Aberdeen City Integration Joint Board the records of the Board itself are managed by a third party (the Council). For these reasons the Keeper must be satisfied that robust data sharing agreements are in place in that third party.</p> <p>In 2015 the Keeper agreed that the information sharing procedures in Aberdeen City Council were appropriate. As the Memorandum of Understanding makes it clear that the IJB follow arrangements whereby “All records of the IJB will be subject with any relevant <u>data sharing agreements</u>.” The Keeper can accept that the public records</p>

			<p>of the IJB will be shared, when appropriate, under the provision of the Council.</p> <p>However, as with element 11 above the Keeper has requested that the IJB amend the text of the RMP to properly reflect this arrangement. The IJB have committed to do this.</p> <p>The Keeper agrees that Aberdeen City Integration Joint Board have appropriate processes in place to ensure information governance is appropriately considered when undertaking information sharing.</p>
<p>15. Public records created or held by third parties</p>	<p>N/A</p>	<p>N/A</p>	<p><u>Third Parties:</u></p> <p>The Public Records (Scotland) Act 2011 (PRSA) makes it clear that records created by third parties when carrying out the functions of a scheduled authority should be considered ‘public records’ - PRSA Part 1 3 (1)(b).</p> <p>The <i>Plan</i> is arranged according to the, 14 element, version of the Keeper’s Model Plan. In May 2019 the Keeper introduced a 15th “Third Party Contractors” element: https://www.nrscotland.gov.uk/record-keeping/public-records-scotland-act-2011/resources/model-records-management-plan</p> <p>However, it should be noted that the requirement to address the issue of third party contractors carrying out functions of an authority has always been integral to the Act.</p> <p>The IJB have made it clear that: “Having considered the requirements we do not use any third parties to provide IJB functions.”</p> <p>The Keeper agrees that this element is not applicable.</p>

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Aberdeen City Integration Joint Board
(‘The IJB’ in the assessment below)

Explanation: All public records of the Aberdeen City Integration Joint Board are held on Aberdeen City Council systems and, as this is the case, the IJB must adopt the records management provision of the Council. This is made clear in the *Records Management Plan* (for example under element 3) and in a *Memorandum of Understanding* signed by the Chief Officer of the IJB and the Team Leader, Legal Services, Aberdeen City Council, a copy of which has been provided to the Keeper.

“The parties to this agreement confirm that all records of the IJB will be held by the Council on behalf of the IJB. All records of the IJB will be subject under the terms of this agreement to all relevant policies and procedures of the Council applying to records management functions and together with any relevant data sharing agreements. The Council agrees that it will manage records held on behalf of the IJB in line with the Council’s Records Management Plan.” (*Memorandum of Understanding*).

The Keeper agreed the *Records Management Plan (RMP)* of Aberdeen City Council in January 2015:

<https://www.nrscotland.gov.uk/files//record-keeping/public-records-act/keepers-assessment-report-aberdeen-city-council.pdf>

In 2020 Aberdeen City Council provided the Keeper with an update on their RMP: <https://www.nrscotland.gov.uk/files//record-keeping/public-records-act/nrs-progress-update-review-final-report-for-aberdeen-city-council-may-2020.pdf>

General Notes on submission: This assessment is on the *Records Management Plan* (the *Plan*) of Aberdeen City Integration Joint Board as submitted to the Keeper of the Records of Scotland for his agreement on 20th October 2020.

The submission to the Keeper included the *Plan*, a *Covering Letter* from Sandra MacLeod, Chief Officer of Aberdeen City Integration Joint Board, and a separate letter from Alan Bell, Head of Information Governance and Data Protection Officer, at NHS Grampian. These letters support the arrangements detailed in the *Plan*.

The *Plan* is also accompanied by the minutes of the Council's Information Governance Group approving submission.

The authority refers to records as a business 'asset' (for example *Records Management Policy* - see element 3 - section 5). This is an important recognition and the Keeper commends it.

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 Aberdeen City Integration Joint Board. Policies and governance structures are in place to implement the actions required by the plan.

Elements that require development by **Aberdeen City Integration Joint Board** are as follows:

Element 09 Data Protection: ICO registration and public Privacy Notice

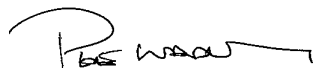
Elements 04 and 05 Business Classification and Retention Schedule: Requires improvement action on the part of the authority on whose systems the IJB's public records are managed.

7. Keeper's Determination

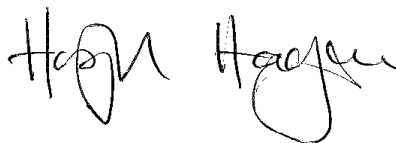
Based on the assessment process detailed above, the Keeper agrees the RMP of **Aberdeen City Integration Joint Board**.

- The Keeper recommends that Aberdeen City Integration 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



.....
Hugh Hagan
Senior 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 **Aberdeen City Integration Joint Board** In agreeing this RMP, the Keeper expects Aberdeen City Integration Joint Board to fully implement the agreed RMP and meet its obligations under the Act.



.....
Paul Lowe
Keeper of the Records of Scotland