

Public Records (Scotland) Act 2011

Clackmannanshire and Stirling Integration Joint Board

The Keeper of the Records of Scotland

25th June 2019

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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 Clackmannanshire and Stirling Integration Joint Board by the Public Records (Scotland) Act 2011 Assessment Team following its submission to the Keeper on 1st March 2019.

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

3. Authority Background

Clackmannanshire and Stirling Integration Joint Board is responsible for the planning and oversight of delivery of health and social care integrated functions for Clackmannanshire and Stirling.

The Board's Integration Scheme sets out the functions which are delegated by NHS Forth Valley and Clackmannanshire and Stirling Councils to the IJB <https://clacksandstirlinghscp.org/>.

The Board operates as a body corporate (a separate legal entity), acting independently of NHS Forth Valley and Clackmannanshire and Stirling Councils. The Board consists of six voting members appointed in equal number by the NHS Forth Valley and a further three voting members from Clackmannanshire Council, and three from Stirling Council. A number of representative members are also drawn from the third sector, independent sector, staff, carers and service users. The Board is advised by a number of professionals including the Chief Officer, Medical Director, Nurse Director and Chief Social Work Officer.

The key functions of the Board are to:

- Prepare a Plan for integrated functions that is in accordance with national and local outcomes and integration principles
- Allocate the integrated budget in accordance with the Plan
- Oversee the delivery of services that are within the scope of the Partnership.

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 Clackmannanshire and Stirling 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:

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| 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

Clackmannanshire and Stirling Integration Joint Board (Referred to as 'The IJB' in the assessment below)

| Element | Present | Evidence | Notes |
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| 1. Senior Officer <i>Compulsory element</i> | G | G | <p>Clackmannanshire and Stirling Integration Joint Board (the IJB) have identified Annemargaret Black, Chief Officer, as the individual with overall responsibility for records management in the authority.</p> <p>This is confirmed in the introduction to the <i>Records Management Plan</i> (the <i>Plan</i>) (page 2) and by a <i>Covering Letter</i> from Ian Aitken, Interim Chief Officer (at time of submission) which accompanied the <i>Plan</i>. The Keeper accepts that Ms Black has taken on the role previously held by Mr Aitken.</p> <p>The IJB have provided the Keeper with the <i>Job Description</i> for their Chief Officer. The Keeper agrees that the post holder has appropriate responsibility in the organisation to be identified to the lead role.</p> <p>The Keeper acknowledges the receipt of a copy of the <i>Minute of the Clackmannanshire & Stirling Integration Joint Board Meeting 28 November 2018</i> which confirms the appointment of individuals and elements 1 and 2 and, furthermore, clearly states that all the public records of the IJB are held on NHS Forth Valley systems.</p> <p>The Keeper agrees that Clackmannanshire and Stirling Integration Joint Board have identified an appropriate individual as required by the Public Records (Scotland) Act</p> |

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| | | | 2011 (the Act). |
| 2. Records Manager <i>Compulsory element</i> | G | G | <p>The IJB have identified Deirdre Coyle, Head of Information Governance for NHS Forth Valley, as the individual with responsibility of the day-to-day implementation of the <i>Plan</i>.</p> <p>This is confirmed by <i>Covering Letters</i> from The Chief Officer of the Clackmannanshire & Stirling Partnership (HSCP) and by Mr Aitken (see element 1).</p> <p>The Keeper has been provided with the <i>Job Description</i> of the Head of Information Governance at NHS Forth Valley and agrees that she is perfectly placed to manage the record of the IJB and therefore of implementing the <i>Plan</i>.</p> <p>The Keeper acknowledges the receipt of a copy of the <i>Minute of the Clackmannanshire & Stirling Integration Joint Board Meeting 28 November 2018</i> which confirms the appointment of individuals and elements 1 and 2 and, furthermore, clearly states that all the public records of the IJB are held on NHS Forth Valley systems.</p> <p>The Keeper agrees that Clackmannanshire and Stirling Integration Joint Board have identified an appropriate individual as required by the Act.</p> |
| 3. Policy <i>Compulsory element</i> | G | G | <p>Clackmannanshire and Stirling IJB create electronic public records. These are held and managed on the system operated by NHS Forth Valley which has already been agreed by the Keeper as appropriate as part of the NHS Board's own submission.</p> <p>This arrangement is clearly confirmed in the <i>Plan</i> (page 7) "NHS Forth Valley will manage all Board records on behalf of the Health and Social Care Partnership." (The Integration Joint Board is the body corporate for the HSCP). Also - page 14 -</p> |

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| | | | <p>“All IJB Records are maintained digitally.” The Keeper has also received <i>Covering Letters</i> from the Integration Joint Board and Health and Social Care Partnership Chief Officers supporting this arrangement.</p> <p>The IJB <i>Plan</i> points to the NHS Forth Valley <i>Corporate Records Management Policy</i> (the IJB does not produce clinical records). This <i>Policy</i> was agreed by the Keeper as appropriate in September 2016.</p> <p>The Keeper agrees that the IJB Plan supports the objectives of the NHS Forth Valley <i>Records Management Policy</i>.</p> <p>The Keeper agrees that Clackmannanshire and Stirling Integration Joint Board have a records management policy statement as required by the Act.</p> |
| 4. Business Classification | A | G | <p>Explanation: Clackmannanshire and Stirling Integration Joint Board consider their public records to be:</p> <p>Administrative records created internally by the IJB and managed on the NHS Forth Valley record keeping systems.</p> <p>This is confirmed in the <i>Plan</i>, in a <i>Covering Letter</i> from the Chief Officer of the Clackmannanshire and Stirling Health and Social Care Partnership: ““The records of the Clackmannan and Stirling IJB are managed by NHS Forth Valley, in accordance with their respective Records Management Plan (RMP).” and in the <i>Minute of the Clackmannanshire & Stirling Integration Joint Board Meeting 28 November 2018</i> “The Partnership had established record keeping systems for Integration Joint Board records, with NHS Forth Valley leading on this on behalf of the IJB.”</p> <p>The Records Management Plan of NHS Forth Valley has been agreed by the</p> |

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| | | | <p>Keeper.</p> <p>For details of this agreement and of subsequent updates see:</p> <p>NHS Forth Valley agreement report (September 2016): https://www.nrscotland.gov.uk/files//record-keeping/public-records-act/keepers-assessment-report-nhs-forth-valley.pdf</p> <p>NHS Forth Valley latest progress review (May 2019): Not yet published.</p> <p>Clackmannanshire and Stirling IJB create electronic public records. These are held and managed on the system operated by NHS Forth Valley which has already been agreed by the Keeper as appropriate as part of the NHS Board's own submission.</p> <p>This arrangement is clearly confirmed in the <i>Plan</i> (page 7) "NHS Forth Valley will manage all Board records on behalf of the Health and Social Care Partnership." (The Integration Joint Board is the body corporate for the HSCP). Also - page 14 - "All IJB Records are maintained digitally." The Keeper has also received <i>Covering Letters</i> from the Integration Joint Board and Health and Social Care Partnership Chief Officers supporting this arrangement.</p> <p>Furthermore, the Keeper acknowledges the receipt of a copy of the <i>Minute of the Clackmannanshire & Stirling Integration Joint Board Meeting 28 November 2018</i> which confirms that all the public records of the IJB are held on NHS Forth Valley systems.</p> <p>The IJB has provided a screen-shot in evidence that IJB records appear on the NHS Forth Valley to this and other information governance policy documents and guidance.</p> |
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| | | | <p>The Keeper agrees that the public records of the IJB are included in an operational ‘business classification scheme’ that appropriately reflects the functions of the authority.</p> <p>However, the Records Management Plan of NHS Forth Valley has been agreed by the Keeper under ‘improvement model’ terms for element 4. This means that the Health Board has identified a gap in provision in this element and is working towards closing that gap.</p> <p>Therefore, the Keeper agrees this element of the Clackmannanshire and Stirling Integration Joint Board’s Records Management Plan under ‘improvement model’ terms.</p> |
| <p>5. Retention schedule</p> | <p>A</p> | <p>G</p> | <p>The IJB <i>Plan</i> notes that they commit to “Clear adherence to the retention, disposal and destruction mechanisms of NHS Forth Valley to maintain and suitably archive all records pertaining to the Integration Joint Board.” (<i>Plan</i> page 3). The Keeper agrees this statement.</p> <p>With this in mind, the IJB has adopted the retention mechanism of NHS Forth Valley on whose record keeping systems their public records sit. The Health Board uses the retention schedules included in the Scottish Government Records Management: NHS Code of Practice (Scotland) 2012 version 2.1 (a new version is forthcoming).</p> <p>The <i>Plan</i> states “for all Integration Joint Board records, this will be the NHS Forth Valley policy.” The Keeper agreed the retention mechanism of NHS Forth Valley in September 2016, albeit as a work-in-progress ‘improvement model’.</p> <p>However, in the meantime, the Keeper agrees that the IJB has a retention schedule matched with the business classification scheme.</p> |

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| | | | <p>However, the Records Management Plan of NHS Forth Valley has been agreed by the Keeper under ‘improvement model’ terms for element 5. This means that the Health Board has identified a gap in provision in this element and is working towards closing that gap.</p> <p>Therefore, the Keeper agrees this element of the Clackmannanshire and Stirling Integration Joint Board’s Records Management Plan under ‘improvement model’ terms.</p> |
| <p>6. Destruction Arrangements <i>Compulsory element</i></p> | <p>A</p> | <p>G</p> | <p>See Retention Schedule (element 5) above</p> <p>The IJB <i>Plan</i> notes that they commit to “Clear adherence to the retention, disposal and destruction mechanisms of NHS Forth Valley to maintain and suitably archive all records pertaining to the Integration Joint Board.” (<i>Plan</i> page 3). The Keeper agrees this statement.</p> <p>As all public records of the IJB are held digitally on the records management systems of NHS Forth Valley the IJB can be considered to be following the destruction processes that form part of these systems. This is made clear in the <i>Plan</i> (page 9).</p> <p>In evidence, the IJB Plan points to the NHS Forth Valley <i>Destruction of Records Policy</i>.</p> <p>The IJB <i>Plan</i> states (page 6): “NHS Forth Valley is committed to a systematic and planned approach to the management of records within the organisation, from their creation to their ultimate disposal.” The Keeper agreed the NHS Forth Valley destruction arrangements (albeit with improvements expected in electronic record destruction) in September 2016.</p> |

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| | | | <p>The Keeper agrees that Clackmannanshire and Stirling Integration Joint Board have processes in place to ensure the secure and irretrievable destruction of public records when appropriate.</p> <p>However, the Records Management Plan of NHS Forth Valley has been agreed by the Keeper under ‘improvement model’ terms for element 6. This means that the Health Board has identified a gap in provision in this element and is working towards closing that gap.</p> <p>Therefore, the Keeper agrees this element of the Clackmannanshire and Stirling Integration Joint Board’s Records Management Plan under ‘improvement model’ terms.</p> |
| <p>7. Archiving and Transfer <i>Compulsory element</i></p> | <p>G</p> | <p>A</p> | <p>The records management statement (<i>Plan</i> page 2) identifies the principle that there should be “Preservation of vital and historical records.”</p> <p>The Chief Officer (see element 1) commits to archiving in a <i>Covering Letter</i> accompanying the submission of the <i>Plan</i> for agreement.</p> <p>As all public records of the IJB are held digitally on the records management systems of NHS Forth Valley the IJB can be considered to be following the destruction processes that form part of these systems.</p> <p>As the records are ‘born digital’ it is unlikely that an operational archiving system is in place. Digital archiving functionality is in very early stages in Scotland. As the IJB is a relatively new body, with no legacy material, it is also unlikely that there is an immediate requirement to transfer public records to archive.</p> <p>The IJB Plan notes an action point to liaise with the NHS Forth Valley archive repository (Stirling University) regarding the IJB records specifically. This will</p> |

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| | | | <p>be done when a permanent Chief Officer (see element 1) has been appointed.</p> <p>The Keeper has agreed that Stirling University is a suitable repository for NHS Forth Valley records (September 2016).</p> <p>As with element 5 the Keeper would like to learn more regarding the IJB taking decisions around what gets archived.</p> <p>The Keeper agrees this element of Clackmannanshire and Stirling Integrated Joint Board’s records management plan on an ‘improvement model’ basis. This means that the authority has identified a gap in provision (the IJB has not discussed their records specifically with the archive) and have put in place a plan to close that gap. The Keeper agreement is conditional on the authority pursuing a meeting with Stirling University Archive Services as soon as is practical. The IJB has acknowledged this.</p> |
| <p>8. Information Security <i>Compulsory element</i></p> | <p>G</p> | <p>G</p> | <p>The introduction to the <i>Plan</i> (page 3) commits the IJB to a “Clear understanding of the approach to maintaining the security of all records and ensuring that staff working with Integration Joint Board Records are suitably trained to do so”.</p> <p>The Chief Officer (see element 1) commits to the security of information in a <i>Covering Letter</i> accompanying the submission of the <i>Plan</i> for agreement.</p> <p>As all public records of the IJB are held digitally on the records management systems of NHS Forth Valley the IJB has committed to following the information security provision of NHS Forth Valley.</p> <p>In evidence, the <i>IJB Plan</i> points to the health board’s <i>Information Security Policy</i> and the supporting suite of guidance and supplementary policies that accompany it. The Keeper agreed in 2016 that NHS Forth Valley has robust procedures in place to</p> |

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| | | | <p>protect the information it creates and manages and that staff are provided with access to appropriate training.</p> <p>The NHS Forth Valley security suite includes reporting instructions.</p> <p>It is worth noting that any <u>Council</u> employee creating or accessing IJB records will be also be covered by their own information security policies. Stirling Council and Clackmannanshire Council have had their information security arrangements agreed by the Keeper (April and June 2017 respectively).</p> <p>The Keeper agrees that Clackmannanshire and Stirling Integration Joint Board have ensured that their public records are covered by operational information security policies as required by the Act.</p> |
| 9. Data Protection | G | G | <p>Clackmannanshire and Stirling Integration Joint Board is covered by the data protection arrangements of NHS Forth Valley. This is confirmed in the <i>Plan</i> (page 12): “The IJB will work within the boundaries of the NHS Forth Valley Data Protection and Confidentiality Policy which is a statement of public responsibility and demonstrates the organisations commitment to compliance with the Act and the safeguarding and fair processing of personal data held.”</p> <p>NHS Forth Valley’s Data Protection Policy which explains the 6 principles of data protection is available at https://nhsforthvalley.com/privacy-policy/ Subject Access information is at: https://nhsforthvalley.com/contact-us/data-protection/</p> <p>It is worth noting that any <u>Council</u> employee creating or accessing IJB records will be also be covered by their own data protection policies and training. Stirling Council and Clackmannanshire Council have had their data protection arrangements agreed by the Keeper (April and June 2017 respectively).</p> |

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| | | | <p>The Keeper has been provided with the <i>Job Description</i> of the Head of Information Governance at NHS Forth Valley (see element 2) and notes that her responsibilities include data protection (although the <i>Job Description</i> refers to the 1998 Act, the Keeper accepts this is likely to have been carried on to the 2018 arrangements).</p> <p>Staff working for the IJB are trained in GDPR/DP2018 (see element 12).</p> <p>The Keeper agrees Clackmannanshire and Stirling Integration Joint Board have properly considered their responsibilities under GDPR/Data Protection Act 2018.</p> |
| <p>10. Business Continuity and Vital Records</p> | <p>A</p> | <p>G</p> | <p>The Clackmannanshire and Stirling Integration Joint Board <i>Plan</i> (page 13) states:</p> <p>“The IJB records are maintained on NHS Forth Valley servers and therefore works within NHS Forth Valley corporate and site Business Recovery/Continuity Plans. These plans include arrangements for the recovery of both physical and digital records and data.”</p> <p>This is confirmed in the introduction to the <i>Plan</i> (page 3) where the IJB commits to an “Adherence to the business continuity systems of NHS Forth Valley to ensure that records are not only secure but that business processes can function in the face of emergency planning situations”</p> <p>In evidence the <i>Plan</i> points to the continuity arrangements of NHS Forth Valley. The Keeper agreed that the health board’s record recovery arrangements were fully compliant in September 2016.</p> <p>However, the Plan notes for further development an action point to undertake a “Review of all resilience policies to ensure they refer to IJB records.” The Keeper agrees this is an important action as the IJB is a relatively new</p> |

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| | | | <p>authority.</p> <p>The Keeper agrees this element of the Clackmannanshire and Stirling Integration Joint Board’s records management plan on ‘improvement model’ terms. This means that the authority has identified a gap in their records management provision (the review of the business continuity system focusing on IJB records has not yet been carried out) but have put processes in place to close that gap.</p> |
| 11. Audit trail | A | G | <p>See arrangements described under element 4</p> <p>The introduction to the <i>Plan</i> (page 2) notes that “Good recordkeeping practices lead to greater productivity as less time is taken to locate information.”</p> <p>With this in mind the IJB has adopted the document tracking procedures of NHS Forth Valley on whose systems the public records of the IJB are held.</p> <p>The Keeper agreed that the ‘audit trail’ provision of NHS Forth Valley was adequate in September 2016, although at the time this was as an improvement model.</p> <p>In evidence the <i>Plan</i> points to NHS Forth Valley audit trail guidance documents.</p> <p>Therefore the Keeper can agree that Clackmannanshire and Stirling Integration Joint Board has taken steps to ensure that their public records can be located when required and that the relevant version of a document can be identified.</p> <p>However, the Records Management Plan of NHS Forth Valley has been agreed by the Keeper under ‘improvement model’ terms for element 11. This means that the Health Board has identified a gap in provision in this element and is working towards closing that gap.</p> |

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| | | | Therefore, the Keeper agrees this element of the Clackmannanshire and Stirling Integration Joint Board's Records Management Plan under 'improvement model' terms. |
| 12. Competency Framework for records management staff | G | G | <p>See also element 2</p> <p>The Keeper agrees that the Head of Information Governance for NHS Forth Valley has the appropriate skills, support and responsibilities to undertake the records manager role for the IJB.</p> <p>Furthermore, the <i>Plan</i> states: "All staff working directly with IJB records provided with appropriate training and development support to ensure all are aware of records management responsibilities. This includes staff employed by local authorities but processing IJB records."</p> <p>IJB Officers receive mandatory training on Data Protection via a training module.</p> <p>The Keeper has already agreed that the staff training provision in NHS Forth Valley, Stirling Council and Clackmannanshire Council is appropriate (September 2016, April and June 2017 respectively).</p> <p>The Keeper agrees that the individual identified at element 2 has the appropriate responsibilities, resources and skills to implement the records management plan. Furthermore, he agrees that the Board consider information governance training for staff as required.</p> |
| 13. | A | G | The Act requires a scheduled public authority to "keep its records management plan |

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| <p>Assessment and Review</p> | | | <p>under review” (part 1 5.1 (a)).</p> <p>The commitment to reviewing the <i>Plan</i> is emphasised in the introduction to the <i>Plan</i> (page 3). The Chief Officer (see element 1) commits to reviewing the implementation of the <i>Plan</i> in a <i>Covering Letter</i> accompanying the submission of the <i>Plan</i> for agreement.</p> <p>The introduction to the Plan refers to a review “no less than 5 years after the plan was last approved.” The Act permits the Keeper to require a review only after 5 years. However, he suggests that a more frequent review would be optimal. To this end he, with contribution from public sector stakeholders, has developed a Progress Update Review process by which he will prompt authorities to self-assess the implementation of their records management plans on an annual basis. Participation in this process is voluntary.</p> <p>The <i>Plan</i> states that the Act is a standing agenda item for the NHS Information Governance Group. This is to be commended. The Keeper can accept that this Group oversee the management of the IJB’s public records on NHS Forth Valley systems.</p> <p>The NHS Forth Valley Head of Information Governance (see element 2) will report to the IJB annually. The Keeper agrees this is appropriate.</p> <p>The Head of Information Governance is developing a self-assessment document to support assessment and review. This will be monitored and reported via Internal Audit. The self-assessment will build upon a self-assessment tool being developed for NHS Forth Valley records.</p> <p>The Keeper agrees this element of the Clackmannanshire and Stirling Integration Joint Board’s Records Management Plan on ‘improvement model’</p> |
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| | | | <p>terms. This means that the authority has identified a gap in provision (the self-assessment mechanism is still in development), but has put processes in place to close that gap. The Keeper’s agreement is conditional on his being updated as requested regarding the progress of the self-assessment mechanism.</p> |
| <p>14. Shared Information</p> | <p>G</p> | <p>A</p> | <p>As part of its function, Clackmannanshire and Stirling Integration Joint Board shares information with other bodies when appropriate and does so under information sharing processes of NHS Forth Valley.</p> <p>The <i>Plan</i> refers to an information sharing protocol (guidance). In evidence for this element the Keeper requires to see an example data sharing agreement featuring the IJB. An MoU with the health board or one of the Councils, allowing the IJB to process data, would suffice.</p> <p>The Keeper has been provided with the <i>Job Description</i> of the Head of Information Governance at NHS Forth Valley (se element 2) and notes that her responsibilities include: “To lead work in partnership with Senior Officials within Partner Agencies and Health to develop where appropriate joint working in Information Governance, through the development and implementation of Information Sharing Protocols. To determine the local need and agreed priorities within the context of Information Governance and the Data Sharing Partnership Forum.” The Keeper agrees that the individual identified at element 2 is well placed to deliver compliance against this element for the IJB.</p> <p>For the moment the Keeper agrees this element of the Clackmannanshire and Stirling IJB’s plan as an improvement model. If, in the future, he can be provided with evidence showing that information governance is considered when information sharing takes place between the IJB and third parties, the Keeper should be able to fully agree this element.</p> |



Clackmannanshire and Stirling Integration Joint Board
(Referred to as 'The IJB' in the assessment below)

Version

This assessment is on the *Records Management Plan* (the *Plan*) dated 26.02.19 and submitted by Clackmannanshire and Stirling Integration Joint Board (the IJB) for the Keeper's agreement on 1st March 2019.

Note: Clackmannanshire Integration Joint Board consider their public records to be:

Records created internally by the IJB and managed on the NHS Forth Valley record keeping systems.

The Keeper of the Records of Scotland has already agreed the Records Management Plan of NHS Forth Valley (although with improvement plans recognised for some elements). See element 4 for more detail.

The Keeper agrees that robust records management provision will help the IJB

- "Demonstrate accountability.
- Provide evidence of actions and decisions.
- Assist with the smooth running of business.
- Help build organisational knowledge." (*Plan* page 2)

The *Plan* mentions the Act and is based on the Keeper's, 14 element Model Plan <http://www.nrscotland.gov.uk/record-keeping/public-records-scotland-act-2011/resources/model-records-management-plan>.

6. Keeper's Summary

Elements 1 – 14 that the Keeper considers should be in a public authority records management plan have been properly considered by the Clackmannanshire and Stirling Integration Joint 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 Clackmannanshire and Stirling Integration Joint Board.

- The Keeper recommends that the Clackmannanshire and Stirling 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

.....
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 Clackmannanshire and Stirling Integration Joint Board. In agreeing this RMP, the Keeper expects Clackmannanshire and Stirling Integration Joint Board to fully implement the agreed RMP and meet its obligations under the Act.



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Paul Lowe

Keeper of the Records of Scotland