

**Public Records (Scotland) Act 2011**

**East Ayrshire Integration Joint Board**

**The Keeper of the Records of Scotland**

**23<sup>rd</sup> January 2020**

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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 East Ayrshire Integration Joint Board by the Public Records (Scotland) Act 2011 Assessment Team following its submission to the Keeper on 28 February 2019.

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

## **3. Authority Background**

New legislation, in the form of the Public Bodies (Joint Working) (Scotland) Act 2014 came into force on 1st April 2014. The Act requires Health Boards and Local Authorities to integrate their health and social care services and as such, East Ayrshire Council and NHS Ayrshire and Arran are working together as a new health and social care partnership.

East Ayrshire Health and Social Care Partnership assumed responsibility for the delivery of an agreed range of health and social care services in April 2015. The purpose of the partnership is "to deliver positive outcomes for the residents of East Ayrshire. Specifically, focusing on ensuring that children and young people get the best start in life, that people live healthier, longer lives and are supported to be independent and have choice and control - no matter who they are or where they live."

The Health and Social Care Partnership is managed by an Integration Joint Board. It is this Integration Joint Board (IJB) that is scheduled under the Public Records (Scotland) Act 2011.

<https://www.east-ayrshire.gov.uk/CouncilAndGovernment/About-the-Council/MinutesAgendasAndReports/EastAyrshireIntegrationJointBoard.aspx>

## 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 East Ayrshire 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:

<b>G</b>	The Keeper agrees this element of an authority's plan.		<b>A</b>	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.		<b>R</b>	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

### East Ayrshire Integration Joint Board For simplicity this authority is referred to as ‘the IJB’ in the assessment below

Element	Present	Evidence	Notes
1. Senior Officer <i>Compulsory element</i>	<b>G</b>	<b>G</b>	<p>East Ayrshire Integration Joint Board (the IJB) have identified Eddie Fraser, Chief Officer, as the individual with overall responsibility for records management in the authority.</p> <p>This identification is supported by a <i>Covering Letter</i> from Mr Fraser (<b>see under General Comments below</b>) and by the IJB’s <i>Records Management Policy</i> (<b>see element 3</b>).</p> <p>The Chief Officer has also provided a single page <i>Records Management Policy Statement</i> (signed) in which he endorses the objectives of the <i>Plan</i>.</p> <p>The Keeper agrees that East Ayrshire 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 <i>Compulsory element</i>	<b>G</b>	<b>G</b>	<p>East Ayrshire Integration Joint Board have identified Amanda McInnes, Senior Manager Business Support, as the individual with day-to-day responsibility for the implementation of the <i>Records Management Plan</i> (the <i>Plan</i>).</p> <p>This identification is confirmed in a <i>Covering Letter</i> from the IJB Chief Officer (<b>see</b></p>

			<p><b>element 1)</b> and in the <i>Records Management Policy (see element 3)</i>.</p> <p>The <i>Plan</i> makes clear that Ms McInnes is supported by the Health and Social Care Partnership (HSCP) Programme Manager and by the HSCP Information Governance Officer.</p> <p>It is also noted that support is available from the East Ayrshire Council records management team when required. This is vital as the public records of the IJB are managed in the Council systems <b>(see ‘explanation’ under element 4)</b>.</p> <p>The Keeper agrees that East Ayrshire Integration Joint Board has identified an appropriate individual to this role as required by the Act.</p>
<p>3. Policy <i>Compulsory element</i></p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>East Ayrshire Integration Joint Board has a <i>Records Management Policy</i> which has been supplied to the Keeper.</p> <p>The <i>Records Management Policy</i> is supported by a single-sheet records management policy statement (a summary of the principles of the <i>Policy</i>) signed by the Chief Officer <b>(see element 1)</b>.</p> <p>The IJB have provided the Keeper with a screen-shot of the Corporate Information Governance Group (CIGG) page on the East Ayrshire Council intranet. This shows that staff have access to records management policies and guidance through that shared resource <b>(See under <u>Corporate Information Governance Group in General Comments below</u>)</b>.</p> <p>The Keeper agrees that the <i>Plan</i> supports the aspirations explained in the <i>Policy</i>.</p> <p>The Keeper agrees that East Ayrshire Integration Joint Board have a ‘records management policy statement’ as required by the Act.</p>

<p>4. Business Classification</p>	<p><b>G</b></p>	<p><b>G</b></p>	<p><b>Explanation: All public records of the East Ayrshire Integration Joint Board are held on East Ayrshire 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 <i>Plan</i> (for example page 16) and in a <i>Covering Letter</i> from the Chair of East Ayrshire Council’s Corporate Information Governance Group (see under General Comments below).</b></p> <p><b>“All support, in the form of staff and resources, is provided by East Ayrshire Council” and “All staff that work with IJB records are Council staff...”</b> <b>(<i>Covering Letter from CIGG Chair</i> – see under General Comments below).</b></p> <p><b>The Plan makes it clear that the IJB is involved in the records management initiatives of the Council (see under <u>Corporate Information Governance Group</u> in General Comments below).</b></p> <p><b>The Keeper agreed the <i>Records Management Plan</i> of East Ayrshire Council in November 2016:</b> <b><a href="https://www.nrscotland.gov.uk/files//record-keeping/public-records-act/keepers-assessment-report-east-ayrshire-council-and-licensing-board.pdf">https://www.nrscotland.gov.uk/files//record-keeping/public-records-act/keepers-assessment-report-east-ayrshire-council-and-licensing-board.pdf</a></b></p> <p>The <i>Plan</i> explains that IJB records are included in the East Ayrshire Council <i>Business Classification Scheme</i> which has been provided to the Keeper.</p> <p>The Keeper notes that East Ayrshire Council is developing an Information Asset Register. He looks forward to subsequent updates on this project from the Council.</p> <p>The East Ayrshire Council <i>Business Classification Scheme</i> arranges by function (Children and Family Services, Information Management etc.). This must remain a business decision for the Council, but the Keeper acknowledges that a functional</p>
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			<p>system, as demonstrated here, is currently considered best practice.</p> <p>The IJB has confirmed that, while the majority of their records are held digitally, they do have some hard-copy public records. The Plan makes it clear that arrangements are in place for managing these under separate arrangements (for example with regard to destruction)</p> <p>The Keeper has been provided with statements explaining the structure of the East Ayrshire Council business classification scheme and the position of the IJB's public records in that structure.</p> <p>The Keeper has already agreed that the <i>Business Classification Scheme</i> of East Ayrshire Council is appropriate (2016).</p> <p>Keeper agrees that the East Ayrshire Integration Joint Board manage their public records in a scheme that provides structure to all records created or held as the authority pursues activities whilst carrying out its functions.</p>
5. Retention schedule	<b>G</b>	<b>G</b>	<p>All public records of East Ayrshire Integration Joint Board are managed under the records management provision of East Ayrshire Council. This includes applying the Council's retention schedule to IJB records:  <a href="https://www.east-ayrshire.gov.uk/Resources/PDF/C/Corporate-Retention-Schedule.pdf">https://www.east-ayrshire.gov.uk/Resources/PDF/C/Corporate-Retention-Schedule.pdf</a></p> <p>As with element 4 above, the Keeper has been provided with statements explaining the structure of the East Ayrshire Council retention scheme and the position of the IJB's public records in that structure.</p> <p>The Keeper has already agreed that the retention schedule operated by East Ayrshire Council is appropriate (November 2016)</p>

			<p>The IJB’s Senior Manager Business Support (<b>see element 2</b>) and the Health and Social Care Partnership’s Information Governance Officer sit on the Council’s Corporate Information Governance Group (CIGG) (<b>see under General Comments below</b>). This group has responsibility for retention and the identification of records for permanent preservation. The Keeper is therefore satisfied that the IJB has input on the disposal of its own information assets.</p> <p>The above is confirmed by a <i>Covering Letter</i> from the Chair of the CIGG who is also the Council’s Information Governance Manager.</p> <p>The Keeper agrees that the East Ayrshire Integration Joint Board have allocated retention decisions against their public records as appropriate.</p>
<p>6. Destruction Arrangements <i>Compulsory element</i></p>	<p><b>A</b></p>	<p><b>G</b></p>	<p>All public records of East Ayrshire Integration Joint Board are managed under the records management provision of East Ayrshire Council. This includes the processes in place for the timely, secure and irretrievable destruction of records.</p> <p>The Keeper has already agreed that the destruction procedures operated by East Ayrshire Council are appropriate (November 2016). The IJB <i>Plan</i> (pages 11 – 13) explains the processes in detail. The Keeper agrees that this includes hard-copy, digital and back-up records and also the secure disposal of hardware.</p> <p><b>However, the IJB has pointed out that the processes around the timely, secure and irretrievable destruction of digital records and e-mail are not satisfactorily controlled. The use of shared drives is an area where many Scottish public authorities encounter difficulty when attempting to impose robust provision. The Keeper acknowledges that the IJB have correctly identified this gap in provision.</b></p>

			<p>The <i>Plan</i> states (page 12): “The Records Manager, in consultation with all Service area representatives, will conduct audits to determine what arrangements are currently in place for the management and destruction of electronic records across all Service areas of the Council. As a consequence of the audit, the Records Manger will work with all Service areas to establish and develop a corporate method to ensure the documented and routine destruction of all electronic records.” The Keeper agrees this action.</p> <p>Also on page 12: “It is recognised that some employees are aware of the procedures to manage emails whilst others are not.” The Plan goes on to explain that training is being provided by the Council to address this awareness. The Keeper agrees this action.</p> <p>The Keeper agrees this element of the East Ayrshire Integration Joint Board Records Management Plan on ‘improvement model’ terms. This means that the authority has recognised a gap in provision and has put processes in place to help close that gap. The Keeper’s agreement is conditional on his being updated on progress.</p>
<p>7. Archiving and Transfer <i>Compulsory element</i></p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>The East Ayrshire Integration Joint Board <i>Records Management Policy</i> (see <b>element 3</b>) specifically refers to “the systematic control of records generated or received by the authority to ensure...preservation” and the “Historical and Research Value – to protect and make available the corporate memory of the IJB to all stakeholders and for future generations.” (both quotes <i>Policy</i> page 5) and also that the “Policy Framework” will be achieved by the identification and application of “A Records Transfer and Archive Policy to ensure the secure transfer of records from sections to the Records Centre or Archives”(page 8).</p> <p>All the public records of the IJB are managed under the records management provision of East Ayrshire Council and the Keeper agrees that it is appropriate that</p>

			<p>the IJB therefore adopts the archiving provision of the Council.</p> <p>The IJB’s Senior Manager Business Support (<b>see element 2</b>) and the Health and Social Care Partnership’s Information Governance Officer sit on the Council’s Corporate Information Governance Group (CIGG) (<b>see under General Comments below</b>). This group has responsibility for retention and the identification of records for permanent preservation. The Keeper is therefore satisfied that the IJB has input on the disposal of its own information assets.</p> <p>The participation of the IJB in the CIGG is confirmed by a <i>Covering Letter</i> from the Chair of the CIGG who is also the Council’s Information Governance Manager.</p> <p>The Keeper has already agreed the archiving provision of East Ayrshire Council (November 2016).</p> <p>The Keeper agrees that East Ayrshire Integration Joint Board have arrangements in place to transfer records for permanent preservation to an appropriate archive as required by the Act.</p>
<p>8. Information Security <i>Compulsory element</i></p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>All the public records created by East Ayrshire Integration Joint Board are held on East Ayrshire Council’s records management systems and are therefore protected by the information security provision of the Council.</p> <p>The <i>Plan</i> confirms this (page 16): “All IJB records are held on Council systems and fully comply with Council processes and so the IJB and those people working with IJB records are fully compliant with the Council’s information security processes and standards.”</p> <p>The Council has a suite of information security policies and guidance which have been shared with the Keeper.</p>

			<p>The Council have previously provided the Keeper with a good description of the fundamentals of information security and an explanation of the physical security standards imposed on Council premises.</p> <p>The Keeper has already agreed that East Ayrshire Council has appropriate information security in place (November 2016).</p> <p>The IJB have provided the Keeper with a screen-shot of the CIGG page on the East Ayrshire Council intranet. This shows that staff have access to information security policies and guidance, including reporting procedures, through that shared resource.</p> <p>Therefore the Keeper agrees that East Ayrshire Integration Joint Board has properly considered the security of its public records as required by the Act.</p>
9. Data Protection	<b>G</b>	<b>G</b>	<p>All the public records created by East Ayrshire Integration Joint Board are held on East Ayrshire Council's records management systems and are therefore protected by the data protection provision of the Council.</p> <p>The Keeper has already agreed that the data protection processes operated by East Ayrshire Council are appropriate (November 2016). However, it should be noted that aspects of this provision will have changed following the implementation of the Data Protection Act 2018 (and GDPR). The Keeper accepts that the Council (and therefore the IJB) are still compliant under this element. Council compliance can be evidenced from the Council website: <a href="https://www.east-ayrshire.gov.uk/Resources/PDF/E/EACDataProtectionPolicy.pdf">https://www.east-ayrshire.gov.uk/Resources/PDF/E/EACDataProtectionPolicy.pdf</a></p> <p>The IJB have provided the Keeper with a screen-shot of the CIGG page on the East Ayrshire Council intranet. This shows that staff have access to data protection guidance through that shared resource.</p>

			<p>The Keeper agrees that East Ayrshire Integration Joint Board has properly considered its responsibilities under the Data Protection Act 2018.</p>
<p>10. Business Continuity and Vital Records</p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>The East Ayrshire Integration Joint Board <i>Records Management Policy</i> (<b>see element 3</b>) commits the authority to the “Identification of Vital Records” (<i>Policy</i> page 5) and that the “Policy Framework” will be achieved by the identification and application of “A Vital Records Policy to protect those records which are essential to the operation of the IJB”(page 8).</p> <p>All the public records of the IJB are managed under the records management provision of East Ayrshire Council and the Keeper agrees that it is appropriate that the IJB therefore adopts the Vital Records Policy of the Council.</p> <p>The IJB have provided the Keeper with a screen-shot of the CIGG page on the East Ayrshire Council intranet. This shows that staff have access to records management guidance through that shared resource.</p> <p>Furthermore the <i>Plan</i> states (page 19) “As a user of Council systems and infrastructure the IJB therefore relies on the Council plans [for business continuity].” The Keeper agrees that this is appropriate.</p> <p>The Keeper has already agreed that the record recovery provision in East Ayrshire Council is suitable (November 2016).</p> <p>The <i>Plan</i> notes that the IJB is able to provide feedback to the Council regarding their business continuity plans. As the public records of the IJB are in the care of the Council this engagement is to be commended. The IJB Senior Manager Business Support (<b>see element 2</b>) represents the IJB on the Council’s Corporate Information Governance Group, the Keeper agrees she is in a good position to provide input</p>

			<p>from the IJB.</p> <p>The Keeper agrees that East Ayrshire 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	<b>A</b>	<b>G</b>	<p>All the public records created by East Ayrshire Integration Joint Board are held on East Ayrshire Council’s records management systems and are therefore tracked by the audit trail provision of the Council.</p> <p>However, the IJB recognise this is an area for improvement in the Council’s arrangements. The Keeper agreed this element of the East Ayrshire Council Records Management Plan under ‘improvement model’ terms stating that <b>“the Council has identified a gap in provision (lack of audit trail provision for some electronic records) and has identified a solution to close this gap. This agreement is conditional upon the Keeper being kept informed of progress.”</b></p> <p><b>The IJB acknowledges this in their <i>Plan</i> with text suggesting that IJB records fall into the ‘lack of audit trail provision for some electronic records’ area of the Council system and state that “This is an area that requires further work” (<i>Plan</i> page 20).</b></p> <p>The Plan commits the IJB to participate <b>(through the CIGG?)</b> in options to introduce an EDM for the Council. As the IJB records would be migrated to this system, their involvement seems appropriate.</p> <p>Key papers of the IJB are published on the East Ayrshire Council website:</p>

			<p><a href="https://www.east-ayrshire.gov.uk/MVC/Committees/Services/Index/406/10">https://www.east-ayrshire.gov.uk/MVC/Committees/Services/Index/406/10</a></p> <p><b>The Keeper agrees this element of the East Ayrshire Integration Joint Board’s <i>Records Management Plan</i> under the same ‘improvement model’ terms as East Ayrshire Council.</b></p>
<p>12. Competency Framework for records management staff</p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>The <i>Plan</i> states “The IJB acknowledges the requirement for professional expertise in records management.” Although the Senior Manager Business Support is not a qualified records manager it is clear that she is adequately supported by an Information Governance Officer from the Health and Social Care Partnership and by the Records Manager of East Ayrshire Council who has a post-graduate diploma in records management and information rights and is a member of several relevant professional organisations.</p> <p>The authority have submitted a letter from Eddie Fraser, Director of Health and Social Care, explaining the responsibilities of Amanda McInnes, Senior Manager Business Support, (see element 2) and confirming the support she can expect with regard to records management in the authority.</p> <p>The <i>Records Management Policy (see element 3)</i> has a section devoted to training. This is welcomed.</p> <p>All staff working with IJB records are required to have completed the East Ayrshire Council’s information governance training (Data Protection, FOI, Information Security and Records Management). The Keeper has previously agreed that the Council’s information governance training modules are appropriate.</p> <p>The IJB have provided the Keeper with a screen-shot of the CIGG page on the East</p>

			<p>Ayrshire Council intranet. This shows that staff have access to e-training through that shared resource.</p> <p>The Keeper agrees that the individual identified at element 2 has the appropriate skills, access and responsibilities to implement the IJB <i>Records Management Plan</i>.</p>
<p>13. Assessment and Review</p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>It is a requirement of the Public Records (Scotland) Act 2011 that “An authority must— (a) keep its records management plan under review” (PRSA Part 1 5.1.a.)</p> <p>The IJB will review and monitor the implementation of the <i>Plan</i> through the East Ayrshire Corporate Information Governance Group (CIGG) <b>(see under General Comments below)</b>.</p> <p>The annual nature of the review is supported by statements in the <i>Records Management Policy</i> <b>(see element 3)</b>.</p> <p><b>As well as the annual review of the implementation of/improvements introduced in the <i>Plan</i> the IJB has committed to intermediate reports to the IJB. The <i>Plan</i> states that these will be six monthly (<i>Plan</i> page 22). However, the <i>Records Management Policy</i> appears to schedule these quarterly (<i>Policy</i> page 3). Either is, of course, fine, but the Keeper would like a definitive statement on the regularity of the between-annual assessments reviews.</b></p> <p>The <i>Records Management Policy</i> <b>(see element 3)</b> is reviewed annually.</p> <p>A “systematic review” of the <i>Plan</i> is endorsed by the Chief Officer <b>(see element 1)</b>.</p> <p>The Keeper agrees that East Ayrshire Integration Joint Board has installed a formal review procedure as part of their records management plan as required by the Act, and that clear review periods have been allocated to supporting policy documents.</p>

<p>14. Shared Information</p>	<p><b>G</b></p>	<p><b>G</b></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 East Ayrshire Integration Joint Board the record 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.</p> <p>The Keeper has already agreed that the information sharing provision in the Council is appropriate (November 2016).</p> <p>Statements in the Plan and evidence supplied make it clear that the Council has robust policies and procedures for info sharing, including Information Sharing Protocols (ISP). A sample ISP has been provided in evidence.</p> <p>The Keeper agrees that East Ayrshire Integration Joint Board appropriately considers information governance when planning data sharing with third parties.</p>
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## **East Ayrshire Integration Joint Board**

**For simplicity this authority is referred to as ‘the IJB’ in the assessment below**

General Notes on RMP, Including Concerns:

### Version

This assessment is on the *Records Management Plan* of the East Ayrshire Integration Joint Board submitted to the Keeper of the Records of Scotland for his agreement on 28<sup>th</sup> February 2019 (the *Plan*).

The *Plan* is accompanied by an improvement plan. This is also currently blank. The Keeper assumes that this will be populated once his assessment report has been considered and this is acceptable.

The *Plan* is also accompanied by a covering letter of support from the IJB Chief Officer (**see element 1**) confirming his role and by a similar letter from the Information Governance Manager & Chair of the Corporate Information Governance Group of East Ayrshire Council confirming that the IJB shares resources with the Council.

The Chief Officer has also provided a single page *Records Management Policy Statement* (signed) in which he endorses the objectives of the *Plan*.

The *Plan* makes it clear that the IJB has for the most part adopted the *Records Management Plan* of East Ayrshire Council which was agreed by the Keeper on 29<sup>th</sup> November 2016: <https://www.nrscotland.gov.uk/files//record-keeping/public-records-act/keepers-assessment-report-east-ayrshire-council-and-licensing-board.pdf>

The IJB acknowledges records as a business ‘asset’ (for example *Plan* page 8 and *Records Management Policy Statement*). The Keeper commends this recognition.

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>.

Third Parties:

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).

The Plan states: "The IJB recognises the importance of protecting information shared with or created by third party contractors in carrying out any functions on behalf of the Authority. In this respect, the IJB complies with the Council's approach which has utilised the guidance developed by the Society of Local Authority Lawyers and Administrators in Scotland (SOLAR) and the Scottish Council on Archives (SCA) for inclusion in all applicable procurement documentation."

The Keeper agrees that the IJB has properly considered this issue.

Corporate Information Governance Group (CIGG)

"the [East Ayrshire Council] CIGG is the forum that produces and maintains policies and procedures relating to information governance and records management." (*Covering Letter* from the Chair of CIGG).

The CIGG meets on a quarterly basis, is chaired by the Council's Senior Information Risk Owner. The IJB Senior Manager Business Support, the Health and Social Care Partnership Information Governance Officer and the Council Records Manager (**see element 2**) are all members.

The *Plan* (page 21) confirms that the IJB has a "...standing membership of the Council's CIGG which ensures that the IJB is able kept [sic] fully up to date with Council records management initiatives and is able to contribute to the ongoing development of

relevant policies and procedures.” As the Council manages the information assets of the IJB this involvement is vital and is to be commended.

The IJB have provided the Keeper with a screen-shot of the CIGG page on the East Ayrshire Council intranet. This shows that Amanda McInnes (**see element 2**) is the representative for the IJB on the group.

The CIGG includes local areas representatives who have specific responsibility for supporting the *Business Classification Scheme* (**see element 4**) and *Retention Schedule* (**see element 5**). The Keeper commends the utilisation of local ‘champions’ when devising a records management action plan.

The CIGG is responsible for initialising the annual review of the *Plan* (*Plan* page 22) (**see element 13**) and other information governance policies and guidance including the *IJB Records Management Policy* (**see element 3**) (*Policy* page 9).

This group is clearly of fundamental importance to records management in the authority and the Keeper thanks East Ayrshire Integration Joint Board for including information about its work in their submission.

## 6. Keeper's Summary

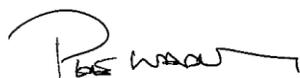
Elements 1 – 14 that the Keeper considers should be in a public authority records management plan have been properly considered by East Ayrshire Integration Joint Board. Policies and governance structures are in place to implement the actions required by the plan.

## 7. Keeper's Determination

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

- The Keeper recommends that East Ayrshire 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 East Ayrshire Integration Joint Board. In agreeing this RMP, the Keeper expects East Ayrshire Integration Joint Board to fully implement the agreed RMP and meet its obligations under the Act.



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