

Public Records (Scotland) Act 2011

East Dunbartonshire Integration Joint Board

The Keeper of the Records of Scotland

9th December 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 East Dunbartonshire Integration Joint Board by the Public Records (Scotland) Act 2011 Assessment Team following its submission to the Keeper on 21st April 2021.

The assessment considered whether the RMP of East Dunbartonshire Integration Joint Board was developed with proper regard to the 15 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 Dunbartonshire Integration Joint Board complies with the Act can be found under section 7 of this report with relevant recommendations.

3. Authority Background

The East Dunbartonshire Integration Joint Board (the IJB) was established under the Public Bodies (Joint Working) Scotland Act 2014. The IJB is a body corporate (a separate legal entity). It is accountable for the stewardship of public funds and is expected to operate under public sector best practice governance arrangements, proportionate to its transactions and responsibilities. Stewardship is a major function of management and, therefore, a responsibility placed upon the appointed members and officers of the Board.

The Health & Social Care Partnership pursues the principles of sound corporate governance within all areas of its affairs. Its Audit Committee is an essential component of the governance of the Health & Social Care Partnership Board detailed within its Financial Regulations.

The IJB consists of six voting members appointed in equal number by the NHS Board and the Council, with a number of representative, non-voting members who are drawn from the third sector, independent sector, staff, carers and service users. The IJB is advised by a number of professionals including the Chief Officer, Chief Finance & Resources Officer, Clinical Director, Chief Nurse and Chief Social Work Officer.

For the purposes of the Public Records (Scotland) Act, the Board (scheduled as the East Dunbartonshire Integration Joint Board) is the scheduled authority rather than the 'Health & Social Care Partnership'.

[East Dunbartonshire Health and Social Care Partnership Board | East Dunbartonshire Council](#)

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 Dunbartonshire 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

East Dunbartonshire Integration Joint Board (‘The IJB’ in the assessment below)

Explanation of Records Management Arrangements: The administration of the East Dunbartonshire Integration Joint Board is undertaken by NHS Greater Glasgow and Clyde. Administration records are therefore managed on NHS systems and disposed of according to NHS retention policies. However, meetings of the Board and the publication of decisions taken at these meetings are the responsibility of East Dunbartonshire Council. Records of the IJB’s decision making process are therefore managed by the Council and are held as part of the Council’s committee management structure. IJB records managed by the Council are identified as having permanent retention and will be transferred to the Council archive service under the pre-existing arrangements for Council records.

The Keeper agreed the Records Management Plan of NHS Greater Glasgow and Clyde on 20th October 2016:

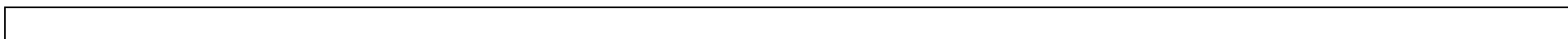
[Keeper’s Assessment Report - NHS Greater Glasgow and Clyde \(nrscotland.gov.uk\)](https://www.nrscotland.gov.uk/records/assessment-reports/keeper-assessment-report-nhs-greater-glasgow-and-clyde)

NHS Greater Glasgow and Clyde provided the Keeper’s Assessment Team with a progress update in 2019:

[NRS - Progress Update Review \(PUR\) Final Report by the PRSA Assessment Team for NHS Greater Glasgow and Clyde June 2019 \(nrscotland.gov.uk\)](https://www.nrscotland.gov.uk/records/assessment-reports/nrs-progress-update-review-pur-final-report-by-the-prsa-assessment-team-for-nhs-greater-glasgow-and-clyde-june-2019)

The Keeper agreed the Records Management Plan of East Dunbartonshire Council on 23rd February 2016:

[East Dunbartonshire Council and East Dunbartonshire Licensing Board Assessment Report \(nrscotland.gov.uk\)](https://www.nrscotland.gov.uk/records/assessment-reports/east-dunbartonshire-council-and-east-dunbartonshire-licensing-board-assessment-report)



Element	Present	Evidence	Notes
1. Senior Officer	G	G	<p>The Public Records (Scotland) Act 2011 (the Act) requires that an individual senior staff member is identified as holding corporate responsibility for records management in a public authority.</p> <p>East Dunbartonshire Integration Joint Board (the IJB) have identified Caroline Sinclair, Interim Chief Officer as the individual with overall responsibility for records management in the authority.</p> <p>Ms. Sinclair has signed the <i>IJB Records Management Plan (the RMP)</i> as evidence of her approval of the document and is the 'corporate owner' of the plan. The Keeper has been provided with a copy of an <i>Memorandum of Understanding</i> between the IJB, the health board and the council that confirms that the Chief Officer is the Senior Information Risk Owner (SIRO) of the IJB. (<i>MoU</i> section 2).</p> <p>The Chief Officer Chairs the Senior Management Team, which has strategic responsibility for the Health and Social Care Partnership.</p> <p>The <i>RMP</i> also includes the following action against this element "Further Development IJB Records Management Procedure, which identifies roles and responsibilities, will be produced once the RMP has been approved." This is a welcome idea and the Keeper requests that he is provided with a copy of this</p>

			<p>guidance if it is developed.</p> <p>The Keeper agrees that East Dunbartonshire Integration Joint Board have identified a suitable individual to this role as required by the Public Records (Scotland) Act (the Act).</p>
<p>2. Records Manager</p>	<p>G</p>	<p>G</p>	<p>The Act requires that each authority identifies an individual staff member as holding operational responsibility for records management and that this individual has appropriate corporate responsibility, access to resources and skills. The Keeper has agreed that, due to the partnership nature of an integration joint board, two individuals may be identified under this element.</p> <p>As noted in the explanation above, the public records of the IJB are managed on the systems of NHS Greater Glasgow and Clyde (records relating to Board administration) and East Dunbartonshire Council (records relating to Board deliberations and output).</p> <p>The <i>RMP</i> explains that public records managed, through to destruction, on NHS systems are the responsibility of the HSCP Corporate Business Manager (Vandrew McLean).</p> <p>The IJB have also identified Karen Watt, East Dunbartonshire Council Information and Records Manager to this element. She will be responsible for the day-to-day management of the IJB records held on Council systems (see explanation above). The Keeper has already agreed that Ms Watt is an appropriate individual to take responsibility for day-to-day management of public records as required by the Act.</p> <p>Ms Watt has provided the Keeper with a confirmatory e-mail in which it is made clear that she understands her role with regard to IJB records. Ms Watt is also named specifically in the <i>Memorandum of Understanding</i> between the IJB, the</p>

			<p>health board and the council supplied to the Keeper (see element 1).</p> <p>As noted above, the Keeper has agreed that two individuals can be named against this element in the case of IJB records management plans. He agrees that the identification of Ms McLean and Ms Watt represent suitable provision against this element.</p>
3. Policy	G	G	<p>The Act requires an authority to have an appropriate policy statement on records management.</p> <p>The introductory paragraph to this element (<i>RMP</i> page 5) identifies that the <i>RMP</i> relates to the management of the public records of the IJB itself and not to the records of the partner bodies created when they undertake the work delegated to them by the Board. This is an important distinction and East Dunbartonshire IJB seem to have understood it correctly.</p> <p>As noted in the explanation above, the public records of the IJB are managed on the systems of NHS Greater Glasgow and Clyde (records relating to Board administration) and East Dunbartonshire Council (records relating to Board deliberations and output). Those managed, through to destruction, on NHS systems are subject to the NHS Records Management Code of Practice, those managed, through to permanent archive, by the council are subject to the East Dunbartonshire Records Management Policy.</p> <p>The Keeper has previously agreed both these policy documents are suitable for the management of the respective body's public records.</p> <p>For further information see:</p> <p>Records Management Code of Practice - NHSX</p>

			<p>Information and Records: Preservation of Archives Policy East Dunbartonshire Council</p> <p>The <i>RMP</i> identifies the record types managed on the council systems: “IJB Meetings - agendas and papers, including Directions, IJB Strategies and Policies, including the Annual Report, Strategic Plan and Delivery Plan” (<i>RMP</i> page 9). The RMP does not provide a similar list of administrative records held on NHS systems. The Keeper would like to remind the IJB that these are also public records as long as they are retained.</p> <p>The <i>RMP</i> notes that the public records held by the council are made publically available on their website: East Dunbartonshire Health and Social Care Partnership Board East Dunbartonshire Council This is a useful tool, but it is important to remember that this is only a publication procedure. Records are <u>managed</u> on the internal systems of the council.</p> <p>The <i>RMP</i> commits the IJB to following the agreed records management plans of the Council and the NHS as appropriate.</p> <p>As both the <i>East Dunbartonshire Council Records Management Policy</i> and the <i>NHS Scotland Records Management Code of Practice</i> are published, the Keeper can agree that IJB staff can access them when appropriate.</p> <p>The Keeper agrees that the public records of East Dunbartonshire Integration Joint Board are subject to formal policies as required by the Act.</p>
4. Business Classification	A	G	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>The IJB recognises this and states in the Introduction to the <i>RMP</i> (page 4): “For records to perform their various functions, some form of management is needed. Management includes control over what is created, development of effective and efficient filing systems to store records, and procedures for retention of records.”</p> <p>The public records of the IJB are held electronically on two separate systems depending on record type. Records relating to the administration of the Board are managed on the systems of NHS Greater Glasgow and Clyde. Records created by the Board as they pursue their functions, such as board minutes, are managed on the systems of East Dunbartonshire Council and routinely published to the Council website: East Dunbartonshire Health and Social Care Partnership Board East Dunbartonshire Council</p> <p>Records managed by the Council are retained permanently (see element 7).</p> <p>All of the public records of the IJB are held digitally.</p> <p>The IJB have provided the Keeper with a <i>Memorandum of Understanding</i> between the IJB and the Council supporting this arrangement (MoU section 1.5). This MoU is dated 2019.</p> <p>The IJB have provided the Keeper with a link to the <i>NHS Greater Glasgow and Clyde Business Classification Scheme Framework</i>, March 2016. He agrees that this accounts for records of the administration of the Health and Social Care Partnership (and thus presumably the IJB).</p> <p>The IJB have also provided the Keeper with a separate attachment to show list of Committee documents processed and held by East Dunbartonshire Council. These have been approved as accurate by Martin Cunningham as SIRO, Caroline Sinclair as Chief Officer, Jean Campbell, Chief Finance and Resources Officer/Vandrew</p>
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			<p>McLean, HSCP Corporate Business Manager. This will be included as part of an update for Business Classification/SCARRS and ratified as part of East Dunbartonshire Council Records Management Plan to the Keeper.</p> <p>A screenshot showing how the records are held on East Dunbartonshire Council system has been provided.</p> <p>The IJB note that the Council has adopted the SCARRS business classification and retention schedule. The Keeper has endorsed this structure as suitable for use by Local authorities in Scotland.</p> <p>The <i>RMP</i> commits the authority to “Continue to review IJB records to ensure adherence to the BCS.” (page 10) This is welcome.</p> <p>However, the <i>NHS Greater Glasgow and Clyde Records Management Plan</i> has been graded with an amber for this element (a full business classification scheme has not yet been imposed on the organisation’s records management system). The Keeper has determined that an IJB’s plan cannot be given a RAG status superior to that of the partner body responsible for managing the IJB records.</p> <p>Therefore, the Keeper’s agreement against this element will be on an amber ‘improvement model’ basis while the health board finalise their business classification and implements it on their new records management structure, which the Keeper understands will be a M365 solution.</p>
5. Retention schedule	G	G	<p>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 Retention Schedule.</p>

			<p>The IJB have noted the records management principle that there should be "consistent and documented retention and disposal procedures, including provision for permanent preservation of archival records." in the introduction to their <i>RMP</i> (page 5)</p> <p>Furthermore, the IJB states in the Introduction to the <i>RMP</i> (page 4): "For records to perform their various functions, some form of management is needed. Management includes control over what is created, development of effective and efficient filing systems to store records, and procedures for retention of records."</p> <p>The public records of the IJB are managed on the systems of NHS Greater Glasgow and Clyde (administration) and of East Dunbartonshire Council (output).</p> <p>Administration records are destroyed according to the NHS Scotland NHS Code of Practice. The Keeper has endorsed this code and agrees it is suitable for the allocation of retention periods to the IJB administrative records.</p> <p>All the records managed by the Council have been identified as having permanent value and this is arranged by managing them as 'Board Servicing' record types which carry automatic permanent-retention status.</p> <p>The Keeper can agree that all the public records of the IJB have been allocated retention decisions and that the IJB clearly has input to the way this is managed by their partner authorities.</p>
6. Destruction Arrangements	G	G	<p>The Act requires that public records are destroyed in a timely, controlled and secure manner.</p> <p>The IJB have noted the records management principle that there should be "consistent and documented retention and disposal procedures..." (<i>RMP</i> page 5)</p>

			<p>The public records of the IJB are managed on the systems of NHS Greater Glasgow and Clyde (administration) and of East Dunbartonshire Council (output).</p> <p>Administration records are destroyed according to the NHS board's <i>Procedure for retention, destruction and archiving of health records</i>. The IJB have provided the Keeper with a link to this document.</p> <p>The Keeper has already agreed that the destruction procedures in NHS Greater Glasgow and Clyde are suitable for ensuring the controlled, secure and irretrievable destruction of the public records they manage. He is content, therefore, that these arrangements will be applied appropriately to the IJB's public records.</p> <p>All the public records of the IJB managed by the Council have permanent-retention status (see element 5) and therefore no destruction will take place. Instead all the IJB records held by the council will be transferred to archive (see element 7).</p> <p>The Keeper has been provided with evidence of IJB records being managed on Council and NHS systems (see element 4) and agrees that they are subject to the disposition arrangements in these partner organisation, which he has already agreed are appropriate.</p> <p>The Keeper notes an action against this element: "Further Development - An inventory of IJB records that have been archived or destroyed will be implemented." This is a highly commended commitment. It is very important that an authority can understand what public records it held in the past even if these records are no longer actively managed by them (or in this case by their partners).</p> <p>The Keeper agrees that the East Dunbartonshire Integration Joint Board have ensured that procedures are in place to ensure the secure and irretrievable</p>
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			destruction of their records when appropriate as required by the Act.
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>East Dunbartonshire Integration Joint Board recognise this and include in the introduction to the <i>RMP</i> that “Good recordkeeping practices lead to...preservation of vital and historical records.” (<i>RMP</i> page 3) and the records management principle that there should be “consistent and documented retention and disposal procedures, including provision for permanent preservation of archival records.” (<i>RMP</i> page 5)</p> <p>None of the public records of the IJB managed by NHS Greater Glasgow and Clyde are identified for permanent preservation (see elements 4 and 5 above).</p> <p>In contrast, <u>all</u> the public records of the IJB managed by the Council are identified for permanent retention.</p> <p>The Keeper can be satisfied that the IJB have input and understanding of how retention decisions are applied to their information assets.</p> <p>Those records selected for permanent preservation are transferred from Council systems, where they are managed, to East Dunbartonshire Archives Archives EDLC</p> <p>In 2016 the Keeper agreed that the archiving and transfer provision in East Dunbartonshire Council had appropriate arrangements in place to allow the permanent preservation of records when required.</p>

			<p>The archiving of born-digital records is in its infancy in Scotland. The IJB have committed to keep itself informed of developments in this sector through engagement with the council or the Leisure Trust. For example they have stated: “The Information Management Team at East Dunbartonshire Council work together at all times to stay ahead of developments in the area of Archiving and Digital Preservation as a specific project earmarked as part of the M365 rollout.”</p> <p>The Keeper agrees that East Dunbartonshire Integration Joint Board have made suitable arrangements for the permanent preservation of their public records as required.</p>
8. Information Security	G	G	<p>The Act requires that public records are held in accordance with information security compliance requirements.</p> <p>The IJB recognise this. They state in the Introduction to the <i>RMP</i> (page 4) that the principles of records management include "Security – Records will be secure from unauthorised or inadvertent alteration or erasure, that access and disclosure will be properly controlled and audit trails will track all use and changes. Records will be held in a robust format which remains readable for as long as records are required.”</p> <p>All the public records of the IJB are held on the records management systems of either NHS Greater Glasgow and Clyde or East Dunbartonshire Council. The <i>RMP</i> confirms this: “The IJB will rely on NHS GG&C and East Dunbartonshire Council arrangements in terms of systems, devices, information sharing platforms.” (<i>RMP</i> page 10).</p> <p>The Keeper has previously agreed that the information security arrangements in NHS Greater Glasgow and Clyde and in East Dunbartonshire Council are appropriate.</p>

			Therefore the Keeper can agree that East Dunbartonshire Integration Joint Board have ensured that their public records are protected by suitable information security processes.
9. Data Protection	G	G	<p>As with all other Scottish public authorities East Dunbartonshire Integration Joint Board have been required to comply with data protection procedures imposed by the 2018 data protection legislation (GDPR and DP2018).</p> <p>However, the IJB is not separately registered with the Information Commissioner as a data controller and has delegated this to the partner organisations. This is acknowledged in the evidence section of the <i>RMP</i> (page 17).</p> <p>The Keeper has already agreed that the data protection processes operated by NHS Greater Glasgow and Clyde and by East Dunbartonshire Council are appropriate (October and February 2016 respectively). 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 health board and the council (and therefore the IJB) are still compliant under this element.</p> <p>Partner compliance can be evidenced from their websites: NHSGGC : Data Protection & Privacy Guide to your rights under GDPR East Dunbartonshire Council</p> <p>The Keeper agrees that East Dunbartonshire Integration Joint Board is aware of its obligations under the 2018 data protection legislation and has procedures in place to protect the personal information it collects and processes.</p>
10. Business	A	G	The Keeper expects that record recovery, prioritising vital records, is an integral part

<p>Continuity and Vital Records</p>			<p>of the authority’s business continuity planning.</p> <p>All the public records of the IJB are managed on the systems of its partner organisations (see explanation above). Therefore, the IJB looks to them to arrange record recovery in an emergency.</p> <p>This arrangement is confirmed in the RMP (page 19) "The IJB’s records will be subject to the policies and procedures of the partner body in relation to business continuity." And "As such there is no direct requirement for the IJB to have its own arrangements for business continuity of vital records." The Keeper agrees this arrangement is sensible.</p> <p>The Keeper has previously agreed the business continuity arrangements in NHS Greater Glasgow and Clyde and in East Dunbartonshire Council. However, the Keeper’s agreement of this element of the council’s RMP was under improvement model terms. At the time of their submission, East Dunbartonshire Council were developing a <i>Business Continuity Plan</i> that would encompass all its services. The objective of creating, rolling out and publishing a comprehensive plan was a target in the Records Management Improvement Action Plan. The agreement is conditional on him being provided with a copy of the <i>Business Continuity Plan</i> when it had been approved by the relevant governance groups in the Council. However, this has not yet been provided.</p> <p>As with element 4 above, the Keeper has determined that an IJB’s plan cannot be given a RAG status superior to that of the partner body responsible for managing the IJB records.</p> <p>Therefore, the Keeper agrees this element of East Dunbartonshire Integration Joint Board’s Records Management Plan under the same improvement model</p>
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			terms applied to that of East Dunbartonshire Council.
11. Audit trail	A	G	<p>The Keeper expects an authority to have processes in place to track public records in such a way that their location is known and changes recorded.</p> <p>The IJB recognise this. They state in the Introduction to the <i>RMP</i> (page 4) that the principles of records management include "that access and disclosure will be properly controlled and audit trails will track all use and changes. Records will be held in a robust format which remains readable for as long as records are required" and "Accessibility – Records and the information within them can be efficiently retrieved by those with a legitimate right of access, for as long as the records are held by the organisation." (page 5).</p> <p>All the public records of the IJB are held on the records management systems of either NHS Greater Glasgow and Clyde or East Dunbartonshire Council. The <i>RMP</i> confirms this: "All IJB records held on the constituent bodies systems will be subject to the policies and procedures of both authorities." (<i>RMP</i> page 21).</p> <p>This arrangement is obviously sensible and the Keeper is satisfied it shows that the IJB have taken suitable steps to allow the location and identification of their public records.</p> <p>The Keeper has previously agreed that the record tracking and identification arrangements in NHS Greater Glasgow and Clyde and in East Dunbartonshire Council. However, he agreed this element of East Dunbartonshire Council's <i>Records Management Plan</i> under 'improvement model' terms (February 2016). This means that he acknowledges that the Council had identified a gap in their records management provision (audit trails were not in a structured, consistent or centralised format). He agreed that the authority had committed to closing that gap. The Keeper's agreement was conditional on him being</p>

			<p>updated as the project progressed. The Council has yet to provide an update, so their plan remains at 'amber'.</p> <p>As with elements 4 and 10 above, the Keeper can agree this element of the Integration Joint Board's <i>Records Management Plan</i> under the same amber 'improvement model' terms as its 'host' authority.</p>
<p>12. Competency Framework for records management staff</p>	<p>G</p>	<p>G</p>	<p>The Keeper expects staff creating, or otherwise processing records, to be appropriately trained and supported.</p> <p>The IJB recognise this. They state in the Introduction to the <i>RMP</i> (page 5) that the principles of records management include "That all staff are informed of their record-keeping responsibilities through appropriate training and guidance and if required further support as necessary."</p> <p>The <i>RMP</i> (page 8) explains that the HSCP Corporate Business Manager (see element 2) is responsible for "Ensuring relevant health and social care staff have records management training." This will either be provided by NHS Greater Glasgow and Clyde or by East Dunbartonshire Council dependant on employer. This is confirmed by the <i>RMP</i> (page 21): "The IJB will rely upon the records manager of the constituent body for compliance under this element."</p> <p>Both the council and NHS board have training modules that staff undertake (<i>RMP</i> pages 9 and 18). Some are mandatory for all staff, others role specific. The <i>RMP</i> specifically mentions Information Sharing Protocol training for example (page 24). Again, online training modules will be provided to IJB staff by the relevant partner.</p> <p>The 'Further Development' section against this element (page 22) states an action to "Continue to maintain, improve and review compliance with statutory training for staff." The Keeper welcomes this commitment.</p>

			<p>The Keeper has previously agreed that the training in records management offered by NHS Greater Glasgow and Clyde and by East Dunbartonshire Council is appropriate.</p> <p>Therefore the Keeper can agree that East Dunbartonshire Integration Joint Board have ensured that staff processing their public records are supported with a suitable training regime.</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 <i>RMP</i> under review.</p> <p>This is recognised by the IJB who commit that their plan “will be continuously reviewed and updated in line with statutory requirements and formally presented to the Integrated Joint Board.” And that “Information Governance for the IJB sits within the accountabilities of the HSCP Corporate Business Manager and the plan will be reviewed and updated on a yearly basis and is taken to the Integration Joint Board for oversight.” (both quotes <i>RMP</i> page 5).</p> <p>The Keeper agrees that the HSCP Corporate Business Manager (Vandrew McLean) (see element 2 above) is ideally placed to review the management of the IJB's public records, held on NHS Greater Glasgow and Clyde systems, annually. This responsibility is confirmed elsewhere in the <i>RMP</i> (page 7).</p> <p>However, Ms. McLean is not able to monitor records management systems operated by the council and the IJB must rely on the council team to undertake this. The <i>RMP</i> states "The IJB relies on the partner authority to ensure that the systems, policies and procedures that govern its records are being regularly assessed (<i>RMP</i> page 22). Karen Watt, the East Dunbartonshire Council Information & Records Manager, has confirmed “that she will share any review results that affect the IJB's public records with the Corporate Business Manager. This will allow the IJB to be</p>

			<p>confident that they understand the complete records management provision applied to all their information assets by East Dunbartonshire Council.” The Keeper has already agreed that the review procedure operated by East Dunbartonshire Council is appropriate.</p> <p>The <i>RMP</i> commits the authority to “Continue to review IJB records to ensure adherence to the BCS.” (page 10) This is welcome.</p> <p>The Keeper agrees that East Dunbartonshire Integration Joint Board have arrangements in place to ensure the appropriate review of their records management plan, as required by the Act.</p>
<p>14. Shared Information</p>	<p>G</p>	<p>G</p>	<p>The Keeper expects a Scottish public authority to ensure that information sharing, is necessary, lawful and controlled.</p> <p>As part of its function, East Dunbartonshire Integration Joint Board shares information with other bodies when appropriate and does so under information sharing processes set out in a formal agreement.</p> <p>In the case of the IJB this is <i>The Greater Glasgow and Clyde Protocol for Sharing Information</i> which has previously been agreed by the Keeper as being appropriate for sharing information between NHS and Council partners: Information sharing protocol (nhsggc.org.uk)</p> <p>The IJB have supported this arrangement by including a sample template agreement in their evidence pack (with the Scottish Prison Service).</p> <p>The Keeper agrees that East Dunbartonshire Integration Joint Board appropriately considers information governance when planning data sharing with third parties.</p>

<p>15. Public records created or held by third parties</p>	<p>N/A</p>	<p>N/A</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>East Dunbartonshire Integration Joint Board state clearly: "The IJB does not contract out any of its functions to a third party." (<i>RMP</i> page 26).</p> <p>The Keeper agrees that this element is not applicable.</p>
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East Dunbartonshire Integration Joint Board
(‘The IJB’ in the assessment below)

Explanation of Records Management Arrangements: The administration of the East Dunbartonshire Integration Joint Board is undertaken by NHS Greater Glasgow and Clyde. Administration records are therefore managed on NHS systems and disposed of according to NHS retention policies. However, meetings of the Board and the publication of decisions taken at these meetings are the responsibility of East Dunbartonshire Council. Records of the IJB’s decision making process are therefore managed by the Council and are held as part of the Council’s committee management structure. IJB records managed by the Council are identified as having permanent retention and will be transferred to the Council archive service under the pre-existing arrangements for Council records.

The Keeper agreed the Records Management Plan of NHS Greater Glasgow and Clyde on 20th October 2016:
[Keeper’s Assessment Report - NHS Greater Glasgow and Clyde \(nrscotland.gov.uk\)](https://www.nrscotland.gov.uk/asset/data/2016/10/20/2016-10-20-keeper-assessment-report-nhs-greater-glasgow-and-clyde)

NHS Greater Glasgow and Clyde provided the Keeper’s Assessment Team with a progress update in 2019:
[NRS - Progress Update Review \(PUR\) Final Report by the PRSA Assessment Team for NHS Greater Glasgow and Clyde June 2019 \(nrscotland.gov.uk\)](https://www.nrscotland.gov.uk/asset/data/2019/06/20/2019-06-20-nrs-progress-update-review-pur-final-report-by-the-prsa-assessment-team-for-nhs-greater-glasgow-and-clyde-june-2019)

The Keeper agreed the Records Management Plan of East Dunbartonshire Council on 23rd February 2016:
[East Dunbartonshire Council and East Dunbartonshire Licensing Board Assessment Report \(nrscotland.gov.uk\)](https://www.nrscotland.gov.uk/asset/data/2016/02/23/2016-02-23-east-dunbartonshire-council-and-east-dunbartonshire-licensing-board-assessment-report)

General Notes on submission:

This assessment is on version 2 of the *East Dunbartonshire Integration Joint Board Records Management Plan* (the *RMP*). Version 2 is dated 31st March 2021.

The *RMP* is arranged according to the Keeper of the Records of Scotland's 15 element Model Plan.

The *RMP* includes the idea that "Good recordkeeping practices lead to greater productivity as less time is taken to locate information. Well managed records will help the IJB make:

- Better decisions based on complete information.
- Smarter and smoother work practices.
- Consistent and collaborative workgroup practices.
- Better resource management.
- Support for research and development.
- Preservation of vital and historical records." (*RMP* page 3).

The Keeper agrees this as an accurate estimation of the value to an authority of robust records management.

The *RMP* correctly recognises that there exists a public expectation that "the IJB is fully committed to creating, managing, disclosing, protecting, and disposing of information effectively and legally."

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

Elements that require development by East Dunbartonshire Integration Joint Board are as follows:

Element 4 Business Classification

Element 10 Business Continuity and Vital Records

Element 11 Audit trail

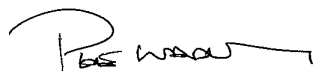
The Keeper acknowledges that these elements require improvement action on the part of the partner authorities on whose systems the IJB's public records are managed rather than by the IJB.

7. Keeper's Determination

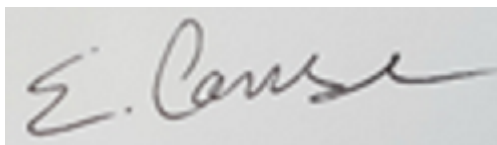
Based on the assessment process detailed above, the Keeper **agrees** the RMP of **East Dunbartonshire Integration Joint Board**.

- The Keeper recommends that East Dunbartonshire 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,



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Pete Wadley
Public Records Officer



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Liz Course
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 In agreeing this RMP, the Keeper expects East Dunbartonshire 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