

**Public Records (Scotland) Act 2011**

**Glasgow City Integration Joint Board**

**The Keeper of the Records of Scotland**

**19<sup>th</sup> March 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 Glasgow City Integration Joint Board by the Public Records (Scotland) Act 2011 Assessment Team following its submission to the Keeper on 18<sup>th</sup> August 2020.

The assessment considered whether the RMP of Glasgow City Integration Joint Board was developed with proper regard to the 14 elements of the Keeper's statutory Model Records Management Plan (the Model Plan) under section 8(3) of the Act, and whether in this respect it complies with it and the specific requirements of the Act.

The outcome of the assessment and the Keeper's decision on whether the RMP of Glasgow City Integration Joint Board complies with the Act can be found under section 7 of this report with relevant recommendations.

## 3. Authority Background

The Public Bodies (Joint Working) (Scotland) Act 2014 required Local Authorities and Health Boards to jointly prepare an Integration Scheme, which sets out how Health and Social Care Integration is to be planned, delivered and monitored within their local area. Within Glasgow City, Glasgow City Council and NHS Greater Glasgow and Clyde have adopted the 'body corporate' model of Health and Social Care Integration.

A separate legal body called the 'Glasgow City Integration Joint Board' is the main decision making body. It leads on, and has devolved responsibility for, the planning and monitoring of community health and social care services. This includes all services for children, adults and older people, along with homelessness and criminal justice services.

<https://glasgowcity.hscp.scot/ijb>

## 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 Glasgow City Integration Joint Board's RMP was developed with proper regard to the elements of the Model Plan and is compliant with the Act. The assessment also considered whether there was sufficient supporting evidence of such compliance.

### Key:

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| <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

### Glasgow City Integration Joint Board

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

**Explanation:** The public records of Glasgow City Integration Joint Board (the IJB) are created and managed digitally on Glasgow City Council systems. Some NHS Officers have access to Council systems in order that they can create/edit IJB records. This arrangement is supported by a *Memorandum of Understanding* between Glasgow City Integration Joint Board, Glasgow City Council and Greater Glasgow & Clyde Health Board. This has been shared with the Keeper.

The *Memorandum of Understanding* confirms: “...all records of the IJB will be held by the Council on behalf of the IJB. All records of the IJB will be subject under the terms of this agreement to all relevant policies and procedures of the Council applying to records management functions....”

For reasons explained above, the IJB Plan relies heavily on the records management provision in the Council.

On 3rd March 2014 the Keeper of the Records of Scotland (the Keeper) agreed the Records Management Plan (RMP) of Glasgow City Council: <https://www.nrscotland.gov.uk/files//record-keeping/public-records-act/keepers-assessment-report-glasgow-city-council-and-licensing-and-valuation-boards.pdf>

| Element | Present | Evidence | Notes |
|---------|---------|----------|-------|
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| <p>1. Senior Officer</p>  | <p><b>G</b></p> | <p><b>G</b></p> | <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>Glasgow City Integration Joint Board have identified Susan Millar, Chief Officer, as the individual with overall responsibility for records management in the authority.</p> <p>The Chief Officer is also the authority’s Senior Information Risk Owner (SIRO).</p> <p>The identification of the Chief Officer to this role is confirmed by Board minutes provide to the Keeper: “The Integration Joint Board:<br/>         (a) Noted the report.<br/>         (b) Designated the Chief Officer as the Senior Responsible Officer for Records Management.”</p> <p>The identification of the Chief Officer as holding corporate responsibility for records management is entirely appropriate.</p> <p>The Keeper agrees that Glasgow City Integration Joint Board have identified a suitable individual to this role as required by the Public Records (Scotland) Act 2011 (the Act).</p> |
| <p>2. Records Manager</p> | <p><b>G</b></p> | <p><b>G</b></p> | <p>The Act requires that each authority identifies an individual staff member as holding operational responsibility for records management and has appropriate corporate responsibility, access to resources and skills.</p> <p>Glasgow City Integration Joint Board have identified Alison Eccles, Head of Business Development, as the individual with day-to-day responsibility for implementing the <i>Records Management Plan</i>.</p>   |

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|           |          |          | <p>This is confirmed by minute of a Board meeting provided to the Keeper:<br/> The Integration Joint Board:<br/> (a) Noted the report.<br/> (c) Designated the Head of Business Development as Operational Records Manager.</p> <p>The Head of Business Development is responsible for “managing the IJB’s records.” and “reviewing and implementing operational policies and procedures in line with the RMP” (<b>see element 13</b>). “Ensuring relevant health and social care staff have records management training” (<b>see element 12</b>) (all <i>Plan</i> page 7).</p> <p>The Keeper has been provided with a copy of the <i>Person Specification</i> for the Head of Business Development (previously titled Head of Service Modernisation) which show that Ms Eccles has appropriate skills and responsibility to undertake this role.</p> <p>The Keeper agrees that Glasgow City Integration Joint Board have identified a suitable individual to this role as required by the Act.</p> |
| 3. Policy | <b>G</b> | <b>G</b> | <p>The Act requires an authority to have an appropriate policy statement on records management.</p> <p>All the public records of the IJB are managed digitally on the record keeping systems of Glasgow City Council (see explanation above). The IJB has therefore committed to following the <i>Records Management Policy</i> of Glasgow City Council.</p> <p>The Keeper has already agreed that the Records Management Policy of Glasgow City Council is suitable (March 2014).</p> <p>There is nothing in the IJB Plan that contradicts Glasgow City Councils’ <i>Records</i></p>   |



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|                                   |                 |                 | <p><i>Management Policy.</i></p> <p>The IJB have provided the Keeper with a screen-shot showing that their staff can access the Glasgow City Council <i>Records Management Policy</i>.</p> <p>Therefore the Keeper can agree that Glasgow City Integration Joint Board have access to an appropriate 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>The Keeper of the Records of Scotland (the Keeper) expects that the public records of an authority are known and are identified within a structure.</p> <p>The introduction to the <i>Plan</i> (page 3) states that records management includes the “...development of effective and efficient filing systems to store records...”</p> <p>To this end Glasgow City Integration Joint Board have stored their public records within the records keeping systems of Glasgow City Council. They explain: “The IJB information is located in a designated folder at the Enterprise level within EDRMS. It has its own Business Classification Scheme and File Plan which is based on the requirements of the IJB and in line with the Council’s scheme.” (Introduction to the <i>IJB Business Classification Scheme</i>)</p> <p>The Keeper has already agreed that Glasgow City Council have an appropriate system for the storage of their public records (March 2014).</p> <p>However, the IJB has a separate area of the Council eDRM and have their own high-level <i>Business Classification Scheme (BCS)</i> which has been provided to the Keeper. The <i>BCS</i> is arranged by function of the IJB. This arrangement must remain a business decision of the authority, but the Keeper acknowledges that a functional scheme, as used here, is currently considered best practice.</p> |

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|                              |                 |                 | <p>All of the public records of the IJB are digital.</p> <p>As well as their separate <i>BCS</i> the IJB has developed an <i>Information Asset Register (IAR)</i> which has also been supplied to the Keeper and which expands the record types identified in the <i>BCS</i> to detail retention decisions (see element 5 below).</p> <p>The Keeper agrees that the IJB has a business classification scheme that appropriately reflects the functions of the authority.</p>  |
| <p>5. Retention schedule</p> | <p><b>G</b></p> | <p><b>G</b></p> | <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 introduction to the <i>Plan</i> (page 3) states that records management includes "...procedures for retention of records..." Retention and Disposal is listed as a core principle of records management (<i>Plan</i> page 5).</p> <p>As well as their high-level <i>Business Classification Scheme (BCS)</i> (see element 4) the IJB has developed an <i>Information Asset Register (IAR)</i> which has also been supplied to the Keeper and which expands the record types identified in the <i>BCS</i> to detail retention decisions.</p> <p>A sample entry would be: Governance Support IJB Members Finance / Expenses, including records relating to processing and payment Date of creation / To end of current term plus 5 years (maximum 10 years) / Destroy / Business requirement.</p> <p>The Keeper agrees that the IAR represents a IJB retention schedule as required.</p> <p>The agreement that specific IJB retention information will be incorporated into the</p> |

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|                                    |                 |                 | <p>Council schedule is apparent in the memo of understanding with supplied to the Keeper.</p> <p>The Keeper agrees that Glasgow City Integration Joint Board has allocated retention decisions for all record types featured in the <i>Business Classification Scheme</i>.</p>   |
| <p>6. Destruction Arrangements</p> | <p><b>G</b></p> | <p><b>G</b></p> | <p>The Act requires that public records are destroyed in a timely, controlled and secure manner.</p> <p>The <i>Plan</i> (page 3) notes that the public expects public authorities to be fully committed to “disposing of information effectively and legally”. Retention and Disposal is listed as a core principle of records management (<i>Plan</i> page 5).</p> <p>All public records of Glasgow City Integration Joint Board are managed under the records management provision of Glasgow City 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 Glasgow City Council are appropriate (March 2014). The Keeper agrees that this includes hard-copy, digital and back-up records and also the secure disposal of hardware.</p> <p>The <i>Plan</i> notes that “Electronic destruction policies will be determined at a later date. At this stage there is only a limited volume of records specific to the IJB.” (<i>Plan</i> page 11). The Keeper understands that, when the IJB function expands it might introduce its own destruction policy (as it already has its own IAR/Retention and Business Classification documentation). <b>He would be interested in more information around this proposal as it develops.</b></p> |

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|                                  |                 |                 | <p>The Keeper agrees that Glasgow City Integration Joint Board has processes in place to irretrievably destroy their records when appropriate.</p>  |
| <p>7. Archiving and Transfer</p> | <p><b>G</b></p> | <p><b>G</b></p> | <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>With this in mind the Keeper requires evidence of arrangements that records that have enduring value are permanently retained and made accessible in accordance with the Keeper’s ‘Supplementary Guidance on Proper Arrangements for Archiving Public Documents’.</p> <p>The <i>Plan</i> indicates that “well managed records with help the IJB with...preservation of vital and historical records.” (<i>Plan</i> introduction page 3). Retention and Disposal is listed as a core principle of records management (<i>Plan</i> page 5).</p> <p>The IJB have identified Glasgow City Council’s archive service (<a href="https://www.glasgowlife.org.uk/libraries/city-archives">https://www.glasgowlife.org.uk/libraries/city-archives</a>) as the repository.</p> <p>The Memorandum of Understanding between the IJB and the Council (see explanation above) states: "The Council makes use of the services of Culture and Sport Glasgow in relation to archives and records management. It is agreed that these services will also be utilised in relation to relevant IJB records."</p> <p>The Keeper has previously agreed that the archive provision of Glasgow City Council is appropriate. The statement in the MoU between the IJB and the Council can be accepted as a formal archiving arrangement for the purposes of the Act.</p> <p>The Keeper acknowledges that digital archiving in the Scottish public sector is in its infancy and it may be many years before those records selected for permanent</p> |

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|                                |                 |                 | <p>preservation are transferred. However, it is important that arrangements are put in place as soon as possible and he recognises that Glasgow City IJB has taken steps to pursue these arrangements.</p> <p><b>However, the Keeper would recommend that the IJB prepare to demonstrate the future involvement of the Council’s archive service in reaching decisions on what records are suitable for permanent preservation. It is important the Keeper can be confident the service which is being tasked with accepting records for permanent preservation is included in the decision making process. It is not currently obvious to the Keeper that this is the case. It would satisfy the Keeper’s requirement to see the Council archive service (Culture and Sport Glasgow), providing a statement in evidence. He recommends the authority engage with his Progress Update Review (PUR) mechanism as a way of updating his assessment team on developments.</b></p> <p>The Keeper agrees that Glasgow City Integration Joint Board have appropriate processes in place to ensure the transfer of records selected for permanent preservation to a suitable repository.</p> |
| <p>8. Information Security</p> | <p><b>G</b></p> | <p><b>G</b></p> | <p>The Act requires that public records are held in accordance with information security compliance requirements.</p> <p>With this in mind, the Keeper requires that authorities can provide evidence that their public records are held in accordance with information security compliance requirements.</p> <p>In the introduction to the <i>Plan</i> the IJB makes a commitment to protecting information effectively and legally (<i>Plan</i> page 3). Security is listed as a core principle of records management (<i>Plan</i> page 5).</p>   |

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|                    |          |          | <p>As the records of the IJB are held on the records management systems of Glasgow City Council they are subject to the information security provision of the Council. The <i>Plan</i> commits the IJB to follow and comply with the Council security provision (Plan page 13). The Keeper has already agreed that the information security arrangements in the Council are appropriate (March 2014). These arrangements include reporting of security incidents and provision for the protection of physical records.</p> <p>However, arrangements have been made for NHS Greater Glasgow and Clyde staff to create IJB records on Council systems. These individuals remain bound by the information security responsibilities imposed on them by their employer. The Keeper has agreed that the information security arrangements of NHS Greater Glasgow and Clyde are appropriate (October 2016).</p> <p>The IJB recognise this when they state (<i>Plan</i> page 13): “All staff that work with IJB records will remain employees of either NHS Greater Glasgow and Clyde or Glasgow City Council. As such they will be subject to the policies and procedures of their employer, i.e. NHS Greater Glasgow and Clyde Information Security Policy or Glasgow City Information Security policies.”</p> <p>The Keeper agrees that Glasgow City Integration Joint Board have arrangements in place to maintain the security of information contained in the authority’s public records.</p> |
| 9. Data Protection | <b>A</b> | <b>G</b> | <p>The Keeper expects a Scottish public authority to manage records involving personal data in compliance with data protection law.</p> <p>The IJB holds limited personal information and, although the records are managed on the systems of Glasgow City Council, it does so as Data Controller.</p>   |

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|  |  |  | <p>This is confirmed by the Memorandum of Understanding between the IJB and the Council (see explanation above) states: "...to the extent that they contain personal data, this means the IJB is the controller of that personal data and the Council acts as the IJB's data processor."</p> <p>IJB staff follow the <i>Data Protection Policy</i> of Glasgow City Council. The Keeper has previously agreed that the data protection provision of the Council is appropriate (albeit that he has not done so since GDPR).</p> <p><b>As Data Controller, the Keeper would expect Glasgow City IJB to be listed with the Information Commissioner, but we were unable to find your entry. Please supply registration number.</b></p> <p>As Data Controller, Glasgow City IJB should have an appointed Data Protection Officer. They have done this: Dr Meechan, Head of Information and Data Protection Officer Glasgow City Council.</p> <p><b>As Data Controller, the Keeper would expect Glasgow City IJB to publish a privacy notice on its website. The IJB has committed to doing this and has supplied the Keeper with a draft version of its <i>Privacy Notice</i>. The Keeper agrees that this document, once signed, will be appropriate to comply with data protection expectations including subject access request procedures.</b></p> <p><b>The Keeper agrees this element of the Glasgow City Integration Joint Board <i>Records Management Plan</i> under 'improvement model' terms. This means that the authority is working towards full compliance and has provided evidence of this (the draft <i>Privacy Policy</i>). The Keeper's agreement is conditional on his being updated as this work progresses. The Keeper will provide the IJB with the opportunity to submit a Progress Update Review a year after agreement. He would expect the <i>Privacy Policy</i> and the registration to be in place by that</b></p> |
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|   |          |          | <b>time.</b>  |
| 10. Business Continuity and Vital Records | <b>G</b> | <b>G</b> | <p>The Keeper expects that record recovery, prioritising vital records, is an integral part of the authority’s business continuity planning.</p> <p>The public records of Glasgow City Integration Joint Board are managed digitally on the systems operated by Glasgow City Council and as such would be subject to the record recovery arrangements of the Council in an emergency.</p> <p>The <i>Plan</i> (page 15) confirms: “IJB’s records are managed in accordance with the Council’s Business Continuity and vital records arrangements.”</p> <p>In March 2014 the Keeper agreed that Glasgow City Council has approved and operational business continuity arrangements in place and that these include the recovery of records.</p> <p>The IJB has separately identified the records it considers ‘vital’ and listed them in their <i>Plan</i> (page 15). The IAR (see element 5) recognises this identification. For example Governance Support / Strategic Plan / Permanent / Retain.</p> <p>The IJB have provided the Keeper with a screen-shot showing that their staff can access the Glasgow City Council <i>Business Continuity Management Policy and Procedures</i>.</p> <p>The Keeper therefore agrees that Glasgow City Integration Joint Board have ensured that their records can be recovered in an emergency and that priority will be given to vital records as appropriate.</p> |
| 11. Audit trail                           | <b>A</b> | <b>G</b> | <p>The Keeper expects an authority to have process in place to track public records in such a way that their location is known and changes recorded.</p>  |



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|  |                 |                 | <p>Accessibility is listed as a core principle of records management (<i>Plan</i> page 5).</p> <p>All IJB public records are managed electronically on Glasgow City Council records management systems.</p> <p>Therefore, all IJB document tracking functionality is dependent on the provision of the Council. The Keeper has been provided with a <i>MoU</i> between the IJB and the Council which confirming this.</p> <p><b>In March 2014 the Keeper agreed this element of the Glasgow City Council <i>Records Management Plan</i>. However he did so under ‘Improvement Model’ terms. This means that he acknowledges that the Council had identified a gap in provision and had put processes in place to close that gap.</b></p> <p><b>The Keeper agrees this element of the Glasgow City Integration Joint Board’s <i>Records Management Plan</i> under the same ‘improvement model’ terms as its ‘host’ authority.</b></p> |
| <p>12. Competency Framework for records management staff</p> | <p><b>G</b></p> | <p><b>G</b></p> | <p>The Keeper expects staff creating, or otherwise processing records, to be appropriately trained and supported.</p> <p>Training is listed by the IJB as a core principle of records management (<i>Plan</i> page 5).</p> <p>“Training for staff who have records management roles or undertake records management activities remains the responsibility of the employing bodies Glasgow City Council and NHS Greater Glasgow and Clyde.” (<i>Plan</i> page 17).</p> <p>The Keeper has previously agreed that the training provision in the council and in</p>  |

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|  |                 |                 | <p>the health board is appropriate (March 2014 and October 2016 respectively).</p> <p><b>The Keeper notes that there is an intention to develop an annual training assurance statement. This is a commendable idea and the Keeper requests he is updated as this project progresses.</b></p> <p>The Keeper agrees that Glasgow City Integration Joint Board considers information governance training for its staff as appropriate.</p>   |
| <p>13.<br/>Assessment<br/>and Review</p> | <p><b>A</b></p> | <p><b>G</b></p> | <p>Section 1(5)(i)(a) of the Act says that an authority must keep its RMP under review.</p> <p>This is acknowledged in the introduction to the <i>Plan</i> (page 3).</p> <p>Glasgow City Integration Joint Board commit to reviewing their <i>Records Management Plan</i> annually (<i>Plan</i> page 1).</p> <p>As all the public records of the IJB are managed digitally on Glasgow City Council systems. The Council's records management provision is reviewed annually with a major review carried out every 3 years or if any significant changes occur (<i>Plan</i> page 18). The Keeper has agreed that the Glasgow City Council review processes are appropriate (March 2014).</p> <p>The IJB's compliance with this element therefore relies on the Council to review the operation of the systems in which the IJB records are managed and to report back the results of this review to the IJB.</p> <p><b>However it appears that the arrangements for this reporting, between the Council review process and the IJB, is not yet formalised. The Plan states a</b></p> |

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|                               |                 |                 | <p><b>‘further development’ (page 18): “Establish schedule to review Records Management requirements annually and provide an assurance statement to the IJB.” The 1st update will be due in Spring 2021.</b></p> <p><b>The Keeper agrees this element of the Glasgow City Integration Joint Board <i>Records Management Plan</i> under ‘improvement model’ terms. This means that the authority is working towards full compliance and has provided evidence of this (the method of the IJB being provided with assurance regarding the Council review is not yet in place). The Keeper’s agreement is conditional on his being updated as this work progresses. The Keeper will provide the IJB with the opportunity to submit a Progress Update Review (PUR) a year after agreement. He would expect the assurance statement methodology to be in place by that time (the target is February 2021).</b></p>   |
| <p>14. Shared Information</p> | <p><b>G</b></p> | <p><b>G</b></p> | <p>The Keeper expects a Scottish public authority to ensure that information sharing, both within the Authority and with other bodies or individuals, is necessary, lawful and controlled.</p> <p>As part of its function, Glasgow City Integration Joint Board shares information with other bodies when appropriate and does so under information sharing processes of set out in a Protocol which has been supplied to the Keeper.</p> <p>This Information Sharing Protocol is the Greater Glasgow and Clyde Protocol for Sharing Information between East Dunbartonshire Council, East Renfrewshire Council, Glasgow City Council, Inverclyde Council, Renfrewshire Council, West Dunbartonshire Council, NHS Greater Glasgow and Clyde, <u>Integration Joint Boards for these areas</u> and the Arms' Length External Organisations of the above-named Councils.</p> <p>The Keeper agrees the Greater Glasgow and Clyde Information Sharing Protocol</p> |

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|   |            |            | <p>adequately considers information governance issues.</p> <p>The Keeper agrees that Glasgow City Integration Joint Board appropriately considers information governance when planning data sharing with third parties.</p>   |
| 15. Public records created or held by third parties | <b>N/A</b> | <b>N/A</b> | <p>The <i>Plan</i> is arranged according to the, 14 element, version of the Keeper’s Model Plan which was operational at the time of the original submission. The Keeper agrees that the authority has addressed the issues of the new 15<sup>th</sup> element (May 2019) in the text of other elements:</p> <p><b><u>Third Parties:</u></b></p> <p>The Public Records (Scotland) Act 2011 (PRSA) makes it clear that records created by third parties when carrying out the <u>functions</u> of a scheduled authority should be considered ‘public records’ - PRSA Part 1 3 (1)(b).</p> <p>This is recognised in the <i>Plan</i> where the IJB specifically confirms in the introductory text that they do not contract out records creation or management to third parties (Plan page 3): “No third party carries out an IJB function on its behalf”.</p> |

**Glasgow City Integration Joint Board**  
For simplicity this authority is referred to as ‘the IJB’ in the assessment below

**Explanation:** The public records of Glasgow City Integration Joint Board (the IJB) are created and managed digitally on Glasgow City Council systems. Some NHS Officers have access to Council systems in order that they can create/edit IJB records. This arrangement is supported by a *Memorandum of Understanding* between Glasgow City Integration Joint Board, Glasgow City Council and Greater Glasgow & Clyde Health Board. This has been shared with the Keeper.

The *Memorandum of Understanding* confirms: “...all records of the IJB will be held by the Council on behalf of the IJB. All records of the IJB will be subject under the terms of this agreement to all relevant policies and procedures of the Council applying to records management functions....”

For reasons explained above, the IJB Plan relies heavily on the records management provision in the Council.

On 3rd March 2014 the Keeper of the Records of Scotland (the Keeper) agreed the Records Management Plan (RMP) of Glasgow City Council: <https://www.nrscotland.gov.uk/files//record-keeping/public-records-act/keepers-assessment-report-glasgow-city-council-and-licensing-and-valuation-boards.pdf>

**General Notes on submission:**

This assessment is on the Records Management Plan (the *Plan*) of Glasgow City Integration Joint Board version 1.1 as submitted to the Keeper in March 2021.

The submission to the Keeper included

- The *Plan*;
- The IJB Business Classification Scheme and Information Asset Register;

- Minutes of relevant board meetings;
- Screen shots showing IJB staff access to relevant Glasgow City Council documents
- and a *Memorandum of Understanding (MoU)* between Glasgow City Integration Joint Board and Glasgow City Council. This *MoU* supports the arrangements detailed in the explanation above.
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The introduction to the *Plan* (page 1) states: “Glasgow City Integration Joint Board is fully committed to compliance with the requirements of the Public Records (Scotland) Act, which came into force on the 1st January 2013. Glasgow City Integration Joint Board will therefore follow procedures that aim to ensure that all officers supporting its operation, being employees of constituent authorities, who create public records on behalf of the authority, or manage public records held by the authority, are fully aware of and abide by this plan’s arrangements.” The Keeper agrees and commends this introductory statement.

The introduction to the *Plan* also notes that good recordkeeping practices 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.

The Keeper fully agrees this introductory statement. He agrees that robust management of the authority’s public records will help promote the key aspiration that “The City’s people can flourish, with access to health and social care support when they need it. This will be done by transforming health and social care services for better lives. We believe that stronger communities make healthier lives.”

The introduction to the *Plan* provides a good explanation of records management under “Why is records management important?” (Plan page 3).

The introduction to the *Plan* makes reference to the Public Records (Scotland) Act 2011. There is a commitment to publish the agreed plan in the IJB's publication scheme:

[https://glasgowcity.hscp.scot/sites/default/files/publications/Publication\\_Scheme\\_Guide\\_to\\_Information\\_-\\_1st\\_April\\_20161.pdf](https://glasgowcity.hscp.scot/sites/default/files/publications/Publication_Scheme_Guide_to_Information_-_1st_April_20161.pdf).

The Keeper welcomes this commitment.

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

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

Element 09 Data Protection: ICO registration and public Privacy Notice

Element 13 Review: Establish schedule to review records management requirements annually

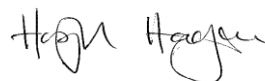
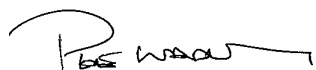
Element 11 Audit Trail (document tracking): Requires improvement action on the part of the authority on whose systems the IJB's public records are managed.

## 7. Keeper's Determination

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

- The Keeper recommends that Glasgow City Integration Joint Board should publish its agreed RMP as an example of good practice within the authority and the sector.

This report follows the Keeper's assessment carried out by,



.....  
**Pete Wadley**

.....  
**Hugh Hagan**



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



.....  
**Paul Lowe**

Keeper of the Records of Scotland