

Public Records (Scotland) Act 2011

Midlothian Integration Joint Board

The Keeper of the Records of Scotland

8th May 2019

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1. Public Records (Scotland) Act 2011

The Public Records (Scotland) Act 2011 (the Act) received Royal assent on 20 April 2011. It is the first new public records legislation in Scotland since 1937 and came fully into force on 1 January 2013. Its primary aim is to promote efficient and accountable record keeping by named Scottish public authorities.

The Act has its origins in *The Historical Abuse Systemic Review: Residential Schools and Children's Homes in Scotland 1950-1995* (The Shaw Report) published in 2007. The Shaw Report recorded how its investigations were hampered by poor record keeping and found that thousands of records had been created, but were then lost due to an inadequate legislative framework and poor records management. Crucially, it demonstrated how former residents of children's homes were denied access to information about their formative years. The Shaw Report demonstrated that management of records in all formats (paper and electronic) is not just a bureaucratic process, but central to good governance and should not be ignored. A follow-up review of public records legislation by the Keeper of the Records of Scotland (the Keeper) found further evidence of poor records management across the public sector. This resulted in the passage of the Act by the Scottish Parliament in March 2011.

The Act requires a named authority to prepare and implement a records management plan (RMP) which must set out proper arrangements for the management of its records. A plan must clearly describe the way the authority cares for the records that it creates, in any format, whilst carrying out its business activities. The RMP must be agreed with the Keeper and regularly reviewed.

2. Executive Summary

This report sets out the findings of the Keeper's assessment of the RMP of Midlothian Integration Joint Board by the Public Records (Scotland) Act 2011 Assessment Team following its submission to the Keeper on 5th November 2018.

The assessment considered whether the RMP of Midlothian 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 Midlothian 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 provides the legislative framework for the integration of health and social care in Scotland.

Midlothian Council and NHS Lothian now work together as a Health and Social Care Partnership governed by the Midlothian Integration Joint Board (IJB). The Midlothian Integration Scheme received Royal Assent on 27th June 2015 and the IJB was formally established on 20th August 2015.

The IJB operates as a body corporate (a separate legal entity), acting independently of NHS Lothian and Midlothian Council. The IJB consists of six voting members appointed in equal number by NHS Lothian and Midlothian Council, with a number of representative 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, Medical Director, Nurse Director and Chief Social Work Officer.

The IJB's key functions are to:

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

Information on the Midlothian Integration Joint Board and its committees includes:

- membership
- dates of meetings
- agendas
- reports
- minutes

<https://midlothian.cmis.uk.com/live/MidlothianIntegrationJointBoard.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 Midlothian 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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Midlothian Integration Joint Board
 Referred to as ‘the IJB’ in the assessment below

5. Model Plan Elements: Checklist

Element	Present	Evidence	Notes
1. Senior Officer <i>Compulsory element</i>	G	G	<p>Midlothian Integration Joint Board (the IJB) have identified Allister Short, Chief Officer, as the individual with overall responsibility for records management in the authority.</p> <p>Mr Short is the authority’s Senior Information Risk Owner (SIRO).</p> <p>The Keeper has been provided with the Chief Officer’s <i>Job Description</i> and he agrees that the identified individual is ideally placed for ensuring the implementation of the <i>Plan</i>.</p> <p>The Chief Officer chairs the Joint Management Team, which has strategic responsibility for the Health and Social Care Partnership.</p> <p>The Keeper agrees that Midlothian 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</i>	G	G	<p>The IJB have identified Tom Welsh, Integration Manager for Midlothian Council, and Roxanne King, Operational Business Manager for NHS Lothian, as the individuals with responsibility of the day-to-day implementation of the <i>Records Management</i></p>

<p><i>element</i></p>			<p><i>Plan (the Plan)</i>. The Keeper has agreed that in the particular circumstances of an integration joint board, two individuals can be identified under this element as long as both have control of the public records of the authority.</p> <p>The public records of the IJB are held on the records management system of Midlothian Council (see element 4), but the Keeper understands that Ms King, although an NHS employee, has access to this.</p> <p>This arrangement is confirmed by a memorandum of understanding between the IJB, the Council and NHS Lothian. A copy of this has been supplied to the Keeper in evidence. The memorandum of understanding has been signed by the IJB Chief Officer (see element 1).</p> <p>The Keeper has been provided with the <i>Job Description of the Integration Manager for Midlothian Council</i> which shows that Mr Welsh has a responsibility to: “Manage the H&SCP teams for ... Information Management.”</p> <p>The Keeper has been provided with the <i>Job Description of the Operational Business Manager for NHS Lothian</i> which shows that Ms King has responsibility for ensuring: “...the HSCP meet governance and statutory requirements in ... information governance.”</p> <p>The <i>Records Management Plan (the Plan)</i> (page 7) notes that these officers have responsibility for reviewing and implementing policies and procedures in line with the <i>Plan</i>.</p> <p>The IJB makes the following statement, which the Keeper acknowledges: “Midlothian Council’s Records, Archives and Document Management Team Lead, ... and her predecessor were involved in the drafting of the IJB’s Plan and are content with the approach taken. While [she] will continue to act as a point of</p>
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			<p>contact and source of expertise... in terms of the IJB's responsiveness on a day to day basis, it is appropriate for our nominated representatives to have operational responsibility. Having representation from each partner organisation also supports resilience, allowing for cross cover, rather than rely on one individual. The post of Integration Manager reports directly to the Chief Officer of the IJB..."</p> <p>The Keeper agrees that Midlothian Integration Joint Board have identified appropriate individuals to this element as required by the Act.</p>
<p>3. Policy <i>Compulsory element</i></p>	<p>G</p>	<p>G</p>	<p>The IJB has provided a records management statement as part of the <i>Plan</i> (pages 4 and 5). They also have formally adopted the <i>Records Management Policy</i> of Midlothian Council on whose servers the IJB public records are held.</p> <p>Midlothian Council's Records Management Policy is available at: https://www.midlothian.gov.uk/downloads/file/1627/records_management_policy</p> <p>The Keeper agrees that the council's <i>Records Management Policy</i> supports the objectives of the IJB <i>Plan</i>.</p> <p>The Keeper agrees that Midlothian Integration Joint Board have a records management policy statement as required by the Act.</p>
<p>4. Business Classification</p>	<p>G</p>	<p>G</p>	<p>Midlothian IJB create electronic public records. These are held and managed on the system operated by Midlothian Council (called CS10) which has already been agreed by the Keeper as appropriate as part of the Council's own submission.</p> <p>This is confirmed in the IJB <i>Plan</i> page 5: "The IJB has agreed with Midlothian Council that all of the IJB's records will be managed by Midlothian Council. The Council operates an in-house records management service..."</p>

			<p>The Keeper has been supplied with a screen-shot showing the IJB records on the Midlothian Council file system.</p> <p>The introduction to the <i>Plan</i> (page 3) commits the IJB to "...managing...information effectively and legally." The IJB <i>Plan</i> notes that "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." (<i>Plan</i> page 4). The Keeper agrees this statement.</p> <p>The Keeper agrees that the public records of Midlothian IJB are held in a structured filing system which promotes appropriate records management and is supportive of the objectives of the <i>Plan</i> and the adopted <i>Records Management Policy</i>. He agrees that this structure includes all records and information the IJB creates and maintains, and shows in which function or service area they are held.</p>
<p>5. Retention schedule</p>	<p>G</p>	<p>G</p>	<p>The IJB <i>Plan</i> notes that "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." (<i>Plan</i> page 4). The Keeper agrees this statement.</p> <p>The <i>Plan</i> states (page 9) that "IJB records are part of the Committee Management System and as such have permanent retention status." And on page 10: "The Business Classification Scheme used by Midlothian Council (CS10) determines how long documents should be retained. IJB records are part of the Committee Management System and as such have permanent retention status"</p>

			<p>The Midlothian Council retention schedule is publically available at https://www.midlothian.gov.uk/downloads/file/1632/business_classification_schemeretention_schedule and does indeed show that <i>Council and committee meeting records including Scrutiny and Members Panels - major records including agenda, signed minutes, major business papers & reports, proceedings...</i> have permanent retention decision allocated. However, the Keeper notes the inclusion of the phrase 'major records'.</p> <p>As such, the IJB records are part of the Committee Management System and as such have permanent retention status under CS10 and will be transferred to archive.</p> <p>Minor records such as emails or draft minutes will not be saved in CS10 and are not preserved. They are deleted as per the retention schedule.</p> <p>The Keeper agrees that Midlothian Integration Joint Board have operational retention decisions against their public records.</p>
<p>6. Destruction Arrangements <i>Compulsory element</i></p>	<p>G</p>	<p>G</p>	<p>The introduction to the <i>Plan</i> (page 3) commits the IJB to "...disposing...information effectively and legally." Furthermore it highlights the principle that the IJB should ensure that "There are consistent and documented retention and disposal procedures..."</p> <p>All public records created by the IJB are managed through the Midlothian Council records management system (CS10). The Keeper agrees that this will include the destruction of records when appropriate. This is made clear by statements against Business Classification (element 4).</p> <p>The <i>Plan</i> states this (page 11): "... the destruction of IJB records, in all formats, will</p>

			<p><i>be undertaken by Midlothian Council.” “All IJB Records will be held electronically on Midlothian Council’s system so no hard copies will require destruction.”</i> The Keeper agrees this is reasonable provision.</p> <p>In light of, and subsequent to, this general statement the IJB has confirmed to the Keeper that</p> <ol style="list-style-type: none"> 1. All records are digital. 2. All major records have permanent retention status and that remote destruction <u>could</u> be facilitated by Midlothian Council if appropriate, e.g. hypothetically in the future if physical records were created. <p>The Keeper agrees that Midlothian IJB have procedures in place to securely and irretrievably destroy public records when appropriate.</p>
<p>7. Archiving and Transfer <i>Compulsory element</i></p>	<p>G</p>	<p>A</p>	<p>The records management statement (<i>Plan</i> page 4) identifies the principle that there should be “consistent and documented retention and disposal procedures, including provision for permanent preservation of archival records.”</p> <p>With this in mind, Midlothian IJB has identified Midlothian Council archive as the repository for any public records selected for permanent preservation (see element 5 above). An agreement is yet to be formally put in place. The <i>Plan</i> states (page 12): “The contractual arrangement with Midlothian Council’s archive will be updated to include provision for IJB records to transfer under the same mechanism as Council records” the Keeper agrees that this is appropriate and requests that the updated contractual arrangement is provided when available.</p> <p>Statements against this element confirm that all public records created by the IJB are electronic (see elements 4 – 6 above).</p>

	G	G	<p>As the public records of the IJB are 'born digital' it is unlikely that an operational archiving system is in place. Digital archiving functionality is in very early stages in Scotland. As the IJB is a relatively new body, with no legacy material, it is also unlikely that there is an immediate requirement to transfer public records to archive.</p> <p>The IJB acknowledges that this service is not yet available: "Digital preservation is not in place and as such, the Council has committed to pursue an Archives Service Improvement Plan over the next five years to address this gap." The Keeper will follow developments in this sector with interest.</p> <p>The IJB have confirmed that a scoping exercise will be undertaken this year re Midlothian Council's needs re digital archiving and preservation. Recommendations will be made by April 2020.</p> <p>The Keeper is able to agree this element of the Midlothian Integration Joint Board's Records Management Plan under 'improvement model' terms. This means that the authority has recognised a gap in provision (no formal agreement with archive) and has put processes in place to close that gap (pursuing contractual clauses to include the archiving of IJB records). The Keeper's agreement is conditional on his being updated when appropriate.</p>
<p>8. Information Security <i>Compulsory element</i></p>	G	G	<p>The introduction to the <i>Plan</i> (page 3) commits the IJB to "...protecting...information effectively and legally." Furthermore the IJB records management statement (<i>Plan</i> page 4) goes on to confirm the principle that: "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>The public records of the Midlothian Integration Joint Board are held on the eDRM</p>

			<p>of Midlothian Council (CS10) and as such are subject to the security arrangements of the Council.</p> <p>The IJB <i>Plan</i> acknowledges this (page 13): “The IJB will rely on Midlothian Council’s arrangements in terms of systems, devices, information sharing platforms etc.”</p> <p>The <i>Plan</i> provides links to the Council’s information security policies and guidance such as their <i>ICT Acceptable Use Policy</i> and <i>Remote Working Policy</i>.</p> <p>The Keeper has previously agreed that the information security provision of Midlothian Council is compliant with the Act.</p> <p>Staff accessing the public records of the IJB are subject to the information security policies of the partner bodies that employ them. Access to Council systems is possible only after the appropriate training and clearance.</p> <p>The Keeper has also agreed the <i>Information Security Policy</i> of NHS Lothian as it applies to the behaviour of NHS Lothian employees.</p> <p>The Keeper agrees that the records of Midlothian Integration Joint Board are covered by operational information security policies as required by the Act.</p>
9. Data Protection	G	G	<p>Although the <i>Plan</i> states that the IJB <u>can</u> be a data controller for IJB records, the IJB have made a clear statement to the Keeper that they do not consider themselves a data controller. The public records are covered by the data protection arrangements of Midlothian Council. This is confirmed in the <i>Plan</i> (page 14): “All IJB records are subject to Midlothian Council’s Data Protection policies and procedures.” The Keeper has previously agreed that these arrangements are appropriate.</p>

			<p>The Keeper has been provided with a copy of Midlothian Council's <i>Privacy Policy</i>. Public information is available at: https://www.midlothian.gov.uk/info/200285/access_to_information/338/privacy_and_cookies</p> <p>The IJB <i>Plan</i> (also page 14) suggests that the authority may develop its own <i>Freedom of Information Policy</i>. This must remain a business decision for the IJB but, for completeness, the Keeper requests that he is provided with a copy of this policy should it be forthcoming.</p> <p>The point of contact for data protection issues in the IJB is the Integration Manager (see element 2).</p> <p>The Keeper agrees that Midlothian Integration Joint Board have appropriately considered their responsibilities under the Data Protection Act 2018.</p>
<p>10. Business Continuity and Vital Records</p>	<p>G</p>	<p>G</p>	<p>The Midlothian Integration Joint Board <i>Plan</i> (page 15) states:</p> <p>“The IJB’s records will be subject to the policies and procedures of the partner body in relation to business continuity.”</p> <p>“The MoU sets out that the IJB’s records are managed in accordance with Midlothian Council’s Business Continuity and vital records arrangements.”</p> <p>The Keeper has been provided with a copy of the MoU.</p> <p>The IJB can track and recover all its public records through the Council’s CS10 records management system.</p> <p>The Keeper agrees that, as all IJB records are held on Midlothian Council servers,</p>

			<p>there is no need for the IJB to have record recovery arrangements separate from the Council (<i>Plan</i> page 15).</p> <p>The Keeper agrees that there are appropriate procedures in place to resume business in the event of a disaster and that consideration has been given to vital records.</p>
<p>11. Audit trail</p>	<p>G</p>	<p>G</p>	<p>See arrangements described under element 4</p> <p>The CS10 system [Midlothian Council’s records management system] gives full version control and ensures that the IJB’s records are available at all times and that these are the current versions.</p> <p>The Keeper accepts that all the IJB’s public records are held on the CS10 system.</p> <p>The IJB records management statement (<i>Plan</i> page 4) goes on to confirm the principle that: “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.” The Keeper agrees that the CS10 should allow this.</p> <p>The Plan states under this element (page 16): “As the IJB develops its own internal and external information systems consideration will be given to the need for audit trail arrangements.” However the IJB have made it clear to the Keeper that This is a hypothetical statement and for the foreseeable future, the IJB will stay with CS10. Please note that should the IJB develop an in-house records management solution, the records management plan would have to be revisited.</p> <p>The Keeper agrees that the Board have procedures in place to locate and identify records when necessary.</p>

<p>12. Competency Framework for records management staff</p>	<p>G</p>	<p>G</p>	<p>See also element 2</p> <p>Midlothian IJB respond to this element by citing the responsibilities and support of the records managers in the partner bodies. The Keeper agrees this is appropriate.</p> <p>They have submitted a <i>Job Description of the Integration Manager for Midlothian Council</i> which shows that Mr Welsh has a responsibility to: “Develop, design and redesign the Information Framework across the integrated service, ensuring reporting arrangements are compliant with this Information Framework.”</p> <p>The Keeper has been provided with the <i>Job Description of the Operational Business Manager for NHS Lothian</i> which shows that Ms King has a responsibility to: “Undertake the leadership of the Administrative and Clerical support functions.”</p> <p>Midlothian Council does not permit access to CS10 (see element 4) without appropriate clearance, training and permissions. It is understood that Ms King has access.</p> <p>Specifically, the <i>Plan</i> notes that Ms King and her administrative team will be trained in the operation of the Council’s records system (see element 4). This is confirmed in the <i>Plan</i> (page 17): “CS10 training to be extended to NHS Lothian administrative team at the Health & Social Care Partnership”.</p> <p>There is a commitment in the <i>Plan</i> (page 17) to investigate specific records management training (other than the mandatory CS10 training) for the officers identified in element 2 through their corporate development process of the partner bodies. This commitment is an appropriate response to the statement in the introduction to the <i>Plan</i> (page 4) where the IJB confirms the ‘records management principle’: “...that all staff are informed of their record-keeping responsibilities through appropriate training and guidance and if required further support as</p>
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			<p>necessary.”</p> <p>The IJB has provided the Keeper with a link to the training element of the Council’s <i>Records Management Plan</i> (page 22) including the <i>Records Management Training Information Sheet</i>. The Keeper has already agreed this training is appropriate.</p> <p>There is a commitment that the post holders named in Element 2 will attend an external Records Management course as recommended by Midlothian Council’s Records, Archives and Document Management Team Lead. In addition, to attend the Surgeries provided by the Keeper. Each of these will be included in the post holders’ objectives and form part of their annual review.</p> <p>The Keeper agrees that the individuals identified at element 2 have the appropriate responsibilities, resources and skills to implement the records management plan. Furthermore, he agrees that the Board consider information governance training for staff as required.</p>
<p>13. Assessment and Review</p>	<p>G</p>	<p>G</p>	<p>The Act requires a scheduled public authority to “keep its records management plan under review” (part 1 5.1 (a)).</p> <p>The <i>Plan</i> commits to this review with reports being submitted to the RMP Planning Group (see below).</p> <p>The <i>Plan</i> states (page 18): “This record management plan will be reviewed and updated through the Joint Management Team. During the first year any gaps in this plan will be identified as issues arise and solutions agreed.”</p> <p>This is confirmed in the introduction to the <i>Plan</i> (<i>Plan</i> page 2).</p>

			<p>The <i>Plan</i> (also page 18) contains the phrase: “Establish a RMP Planning Group to meet and review policy before formal ratification by IJB.” As noted above, this group is also mentioned in the introduction to the <i>Plan</i>. The group is yet to be formed, but the intention is that this will consist of the Integration Manager, Operational Business Manager (both of whom are members of the Joint Management Team, as well as representation from the Health & Social Care Partnership Administrative Team.</p> <p>The Keeper agrees that the Board have processes in place to review their <i>Plan</i> as required by the Act and have determined a time when this will take place. The responsibility for undertaking the review and the review reporting procedure are also clearly laid out. Furthermore the Keeper acknowledges that appropriate review dates have been allocated to the key Council documents.</p>
<p>14. Shared Information</p>			<p>Midlothian Integration Joint Board shares information with other bodies when appropriate and does so under an ‘Information Exchange Portal’ developed to enable effective information sharing partnerships. The Keeper has seen examples of this portal from Midlothian Council and NHS Lothian.</p> <p>The Keeper can agree that Midlothian Integration Joint Board properly considers records governance when undertaking information sharing programmes.</p>

Midlothian Integration Joint Board
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 Midlothian Integration Joint Board version 1.0 ratified on 11th October 2018 and submitted to the Keeper of the Records of Scotland for his agreement on 5th November 2018 (the *Plan*).

The *Plan* contains a detailed introduction/summary and records management statement (pages 1 – 5). The Keeper agrees that robust records management provision helps the authority meet its ‘strategic outcomes’ as explained.

The *Plan* explains the purpose of records management (page 3).

The Plan explains (page 5): “The context of this plan is that most records including employment, service user and internal policies and procedures will continue to be managed in the parent body organisations, i.e. Midlothian Council and NHS Lothian and as such will be covered by their respective record management plans.” The Keeper agrees this arrangement.

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 IJB makes the following statement in the Plan (page 19): "The Act regards records created by a third party under contract to a public body to deliver a statutory function of that authority as public for the purposes of the Act. This means that authorities in such a relationship must be satisfied that public records being created on its behalf are managed in line with its RMP. It must be satisfied that the third party provider has robust records management arrangements in place. However, it is unlikely that this is relevant to the IJB." In the introduction the *Plan* states: "The IJB will therefore follow procedures that aim to ensure that all of its officers employees of constituent authorities supporting its work, contractors, agents, consultants and other trusted third parties 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."

However, the IJB has confirmed to the Keeper that currently, no third party carries out an IJB function on its behalf.

6. Keeper's Summary

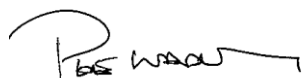
Elements 1 - 14 that the Keeper considers should be in a public authority records management plan have been properly considered by **Midlothian Integration Joint Board**. Policies and governance structures are in place to implement the actions required by the plan.

7. Keeper's Determination

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

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



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