

**Public Records (Scotland) Act 2011**

**Inverclyde Integration Joint Board**

**The Keeper of the Records of Scotland**

**6th August 2020**

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## 1. Public Records (Scotland) Act 2011

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

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

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

## 2. Executive Summary

This report sets out the findings of the Keeper's assessment of the RMP of Inverclyde Integration Joint Board by the Public Records (Scotland) Act 2011 Assessment Team following its submission to the Keeper on 5<sup>th</sup> June 2019.

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

## 3. Authority Background

Inverclyde Integration Joint Board is made up of voting members, who are either Councillors of Inverclyde Council or non-executive Directors of NHS Greater Glasgow and Clyde, and non-voting members made up of persons nominated by the Council, the NHS Board, third sector bodies, users, carers and other key stakeholders. The Integration Joint Board is a separate legal entity from Inverclyde Council and NHS Greater Glasgow and Clyde and has full autonomy and capacity to act on its own behalf. Health and Social Care functions have been delegated to the Integration Joint Board from the Council and NHS Greater Glasgow and Clyde and the Integration Joint Board is responsible for the planning and operational management of the services to which the delegated functions relate.

<https://www.inverclyde.gov.uk/meetings/committees/57>

## 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 Inverclyde 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

### Inverclyde Integration Joint Board (For simplicity referred to as 'the IJB' in the assessment)

**Explanation:** The public records of Inverclyde Integration Joint Board (the IJB) are created and managed digitally on Inverclyde 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 Inverclyde Integration Joint Board, Inverclyde Council and Greater Glasgow & Clyde Health Board. This has been shared with the Keeper although it appears to be draft. **If this document has now been approved the Keeper requests that he is sent a copy of the signed version.**

The *Memorandum of Understanding* confirms: "The records covered by the IJB's records management plan constitute IJB business in terms of: IJB Meetings and related committees - agendas and papers, including Directions, Audit and Risk Committee and Strategic Planning and IJB Strategies and Policies, including the Annual Report, Strategic Plan and Delivery Plan.

The Parties acknowledge and agree that the responsibility for creating and maintaining the IJB's records will be delegated to the Council." (*Memorandum of Understanding* sections 1.3 and 1.5)

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

On 12<sup>th</sup> November 2015 the Keeper of the Records of Scotland (the Keeper) agreed the Records Management Plan (RMP) of Inverclyde Council: <https://www.nrscotland.gov.uk/files//record-keeping/public-records-act/keepers-assessment-report-inverclyde-council-inverclyde-licensing-board.pdf>

In 2019 Inverclyde Council provided the Keeper with an update on their RMP: <https://www.nrscotland.gov.uk/files/record-keeping/public-records-act/nrs-progress-update-review-final-report-inverclyde-council-and-inverclyde-licensing-board-july-2019.pdf>

Element	Present	Evidence	Notes
1. Senior Officer	<b>G</b>	<b>G</b>	<p>Inverclyde Integration Joint Board (the IJB) have identified Louise Long, Chief Officer of the IJB, as the individual with overall responsibility for records management in the authority.</p> <p>This is confirmed by a <i>Memorandum of Understanding (MoU)</i> between the IJB and Inverclyde Council and Greater Glasgow and Clyde Health Board which has been supplied to the Keeper of the Records of Scotland (the Keeper) in evidence.</p> <p>The IJB's Chief Officer is also the IJB's Senior Information Risk Owner (SIRO).</p> <p>The Chief Officer chairs the Joint Senior Management Team.</p> <p>The Keeper agrees that Inverclyde 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	<b>G</b>	<b>G</b>	<p>Inverclyde Integration Joint Board have identified Jeanette Hawthorn, Service Manager Strategy and Support Services, Inverclyde Council, as the individual with day-to-day responsibility for implementing the <i>Records Management Plan (the Plan)</i> in the authority.</p>

			<p>This is confirmed by a <i>MoU</i> between the IJB and Inverclyde Council and Greater Glasgow and Clyde Health Board which has been supplied to the Keeper in evidence.</p> <p>All the public records of the IJB are managed digitally on Inverclyde Council systems (see element 4 below). Ms. Hawthorn is a Council employee and as such has full access to the IJB's public records.</p> <p>The IJB have provided the Keeper with a copy of the Service Manager's <i>Job Description</i> which confirms that she has responsibility for 'Business Information Services' and would therefore be well placed to oversee the maintenance and implementation of the <i>Records Management Plan</i>.</p> <p>The RMP itself confirms that The Service Manager has formal responsibility for:</p> <ul style="list-style-type: none"> <li>• Managing the IJB's records;</li> <li>• Reviewing and implementing operational policies and procedures in line with the RMP;</li> <li>• Ensuring relevant health and social care staff have records management training.</li> </ul> <p>The Keeper agrees that Inverclyde Integration Joint Board have identified an appropriate individual to this role as required by the Act.</p>
3. Policy	<b>G</b>	<b>G</b>	<p>The public records of Inverclyde Integration Joint Board are managed on the records management systems of Inverclyde Council.</p> <p>In November 2015 the Keeper agreed this element of the Inverclyde Council <i>Records Management Plan</i>. He accepts that the records of the IJB are managed</p>



			<p>according to the Records Management Plan of the Council.</p> <p>The IJB have provided the Keeper with a statement confirming that they follow the Records Management Policy of Inverclyde Council.</p> <p>Therefore the Keeper can agree that Inverclyde Integration Joint Board have access to appropriate records management policy statements as required by the Act.</p>
<p>4. Business Classification</p>	<p><b>A</b></p>	<p><b>G</b></p>	<p>The Keeper requires evidence that the public records of Inverclyde Integration Joint Board are known and are identified within a structure, ideally founded on function.</p> <p>In the introduction to the <i>Plan</i> the IJB makes a commitment to managing information effectively and legally (<i>Plan</i> page 3).</p> <p>The records covered by the IJB's records management plan constitute IJB business in terms of: IJB Meetings and related committees - agendas and papers, including Directions, Audit and Risk Committee and Strategic Planning and IJB Strategies and Policies, including the Annual Report, Strategic Plan and Delivery Plan. The Keeper agrees that the public records of the IJB are known.</p> <p>"The IJB will follow the corporate Business Classification Scheme adopted by Inverclyde Council." (<i>Plan</i> page 9). This arrangement is confirmed by a <i>Memorandum of Understanding (MoU)</i> between the IJB and the Council which has been supplied to the Keeper. It states: "The Parties acknowledge and agree that the responsibility for creating and maintaining the IJB's records will be delegated to the Council." (<i>MoU</i>) section 1.3). The <i>MoU</i> goes on to state: "The IJB will follow the corporate Business Classification Scheme (BCS) adopted by the Council and the Council's BCS has been updated to include IJB records. This has been discussed and agreed as a sensible approach by the Board and the Council" (<i>MoU</i> section 1.5). The Keeper agrees that the public records of the IJB are identified within a</p>

			<p>structure.</p> <p>Inverclyde Council’s Business Classification Scheme is based on the SCARRS (Scottish Council on Archives Records Retention Schedule). The Keeper has endorsed this system as being appropriate for use by Scottish local authorities.</p> <p>The IJB have provided the Keeper with a screen-shot of the Council business classification scheme showing Board records are indeed managed under that system.</p> <p><b>In November 2015 the Keeper agreed this element of the Inverclyde 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 [business classification not rolled out throughout the organisation] and has put processes in place to close that gap. The Keeper’s agreement was conditional on his being updated on progress as the project develops. The Council did this in 2019 and at that time the Keeper’s Assessment Team confirmed that this element remained at ‘amber’ as the work progressed.</b></p> <p><b>Therefore, the Keeper can agree this element of the Inverclyde Integration Joint Board’s <i>Records Management Plan</i> under the same ‘improvement model’ terms as its ‘host’ authority.</b></p>
<p>5. Retention schedule</p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>The public records of Inverclyde Integration Joint Board are managed under the procedures of Inverclyde Council.</p> <p>In November 2015 the Keeper agreed that Inverclyde Council operated an appropriate retention mechanism.</p>

			<p>The IJB have provided the Keeper with a screen-shot of the Council business classification scheme showing Board records are indeed managed under that system.</p> <p>The Keeper understands that the Council’s structure automatically applies a ‘permanent preservation’ retention decision on all IJB records. This has been agreed by the Council and by the IJB in a <i>MoU</i> which has been shared with the Keeper.</p> <p>This arrangement is explained in detail in the compliance statement under this element in the <i>Plan</i>.</p> <p><b>The Keeper is content that the record classes specifically named under the MoU are suitable for permanent preservation. He is also pleased to know the MoU will be authorised at the highest level. He notes, however, that the proposed selecting process is at odds with normal archive practice. A ‘keep all’ policy would normally put an authority in conflict with statutory obligations under other information legislation, i.e., the Data Protection Act 2018 and the Freedom of information (Scotland) Act 2002. He is therefore concerned to know the authority is confident its ‘keep all’ policy is protecting the statutory obligations of the Chief Officer.</b></p> <p><b>The Keeper recommends the Chief Officer routinely and regularly reviews this arrangement to remain alert to new classes of IJB records that may be created as the body matures and grows. This will allow new records with enduring value to be added to the MoU and for a close watch to be kept on all the authority’s statutory obligations under other information legislation.</b></p> <p>The Keeper agrees that the public records of the IJB have retention decisions applied as appropriate.</p>
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6. Destruction Arrangements	<b>N/A</b>	<b>N/A</b>	<p>“All IJB Records will be held electronically on Inverclyde Council’s systems...” (Plan page 13). “IJB records are part of the Committee Management System and as such have permanent retention status” (Plan page 10).</p> <p>This arrangement is confirmed by a <i>MoU</i> between the IJB, the council and the health board which has been shared with the Keeper. It states: “IJB records are part of the Committee Management System and as such have permanent retention status, which comply with statutory obligations set out under the Public Records (Scotland) Act 2011 and all other relevant legislation.”</p> <p>The Keeper therefore accepts that no public records of the Integration Joint Board are subject to destruction arrangements and that this element does not apply to this authority.</p> <p>That said the Assessment Team would like to point out that a ‘keep everything permanently’ retention decision is very unusual. We feel that permanently retaining all information without due consideration of its contents is not good records management practice and would, depending on the nature of the information, leave an authority open to potential non-compliance under Data Protection legislation and not best able to manage efficiently and effectively FOI obligations. However, the Keeper accepts that is clearly the current business decision taken by the authority as evidenced by the MoU.</p>
7. Archiving and Transfer	<b>A</b>	<b>G</b>	<p>The Public Records (Scotland) Act (The Act) specifically requires an authority’s <i>Records Management Plan</i> to include provision about archiving the authority’s public records (Act Part 1 1.2(b)(iii)).</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</p>

			<p>with the Keeper’s ‘Supplementary Guidance on Proper Arrangements for Archiving Public Documents’.</p> <p>The introduction to the <i>Plan</i> notes that well managed records will help the IJB pursue preservation of vital and historical records (<i>Plan</i> page 3)</p> <p>The public records of Inverclyde Integration Joint Board are managed in the <i>Business Classification System</i> of Inverclyde Council (see element 4). The Council’s structure automatically applies a ‘permanent preservation’ retention decision on all IJB records. This has been agreed by the Council and by the IJB in a <i>MoU</i> which has been shared with the Keeper (see element 6 above).</p> <p>The arrangement by which <u>all</u> IJB records are transferred to an archive for permanent preservation is confirmed under element 4 (<i>Plan</i> page 10).</p> <p>The Keeper agrees that the IJB have identified records of enduring value.</p> <p>Inverclyde Council utilise an in-house archive service:  <a href="https://www.inverclyde.gov.uk/community-life-and-leisure/heritage-services/archives">https://www.inverclyde.gov.uk/community-life-and-leisure/heritage-services/archives</a></p> <p>The Keeper agrees that arrangements are in place to ensure that IJB records that have enduring value are permanently retained and made accessible.</p> <p><b>The Keeper notes, however, that the proposed selecting process is at odds with normal archive practice. A ‘keep all’ policy would normally put an authority in conflict with statutory obligations under other information legislation, i.e., the Data Protection Act 2018 and the Freedom of information (Scotland) Act 2002. He is therefore concerned to know the authority is confident its ‘keep all’ policy is protecting the statutory obligations of the Chief Officer. He recommends the IJB plan demonstrates the involvement of the Council’s archive service in reaching decisions on what records are</b></p>
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			<p>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, in conjunction with the records and information services, represented under the MoU submitted in evidence.</p> <p>The MoU clearly indicates the authority's archiving commitment. The Keeper expects the authority will, however, review its arrangements, including selection, transfer and accommodation arrangements, under the provisions agreed for Element 13. He recommends the authority engage with his Progress Update Review mechanism as a way of updating his assessment team on developments.</p> <p><b>In November 2015 the Keeper agreed this element of the Inverclyde Council <i>Records Management Plan</i>. However he did so under 'Improvement Model' terms. The Council was not entirely satisfied that their archive provision was fully mapped against the <i>Proper Arrangements</i> guidance document. The Council updated the Keeper's Assessment Team in 2019 and this element remains at 'amber' while remedial work progresses.</b></p> <p><b>The Keeper agrees this element of the Inverclyde Integration Joint Board's <i>Records Management Plan</i> under the same 'improvement model' terms as its 'host' authority.</b></p>
8. Information Security	<b>G</b>	<b>G</b>	<p>The Public Records (Scotland) Act (The Act) specifically requires an authority's <i>Records Management Plan</i> to include provision about maintaining the security of information contained in the authority's public records (Act Part 1 1.2(b)(ii)).</p> <p>With this in mind, the Keeper requires that authorities can provide evidence that</p>

			<p>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).</p> <p>All IJB public records are created and managed on the systems of Inverclyde Council. The Keeper has already agreed that the information security arrangements in the Council are appropriate (November 2015).</p> <p>However, arrangements have been made for NHS Greater Glasgow and 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 15): “All staff will remain employees of either NHS GG&amp;C or Inverclyde Council. As such they will be subject to the policies and procedures of their employer, i.e. NHSGG&amp;C Information Security Policy or Inverclyde’s Security policies.”</p> <p>The Keeper agrees that Inverclyde 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>G</b>	<b>G</b>	<p>As with all other Scottish public authorities Inverclyde 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</p>

			<p>a data controller and has delegated this to the Council. This is acknowledged in the <i>Plan</i> (page 18).</p> <p>The Keeper has already agreed that the data protection processes operated by Inverclyde Council are appropriate (November 2015). However, it should be noted that aspects of this provision will have changed following the implementation of the Data Protection Act 2018 (and GDPR). The Keeper accepts that the Council (and therefore the IJB) are still compliant under this element. Council compliance can be evidenced from the Council website:  <a href="https://www.inverclyde.gov.uk/law-and-licensing/freedom-of-information/data-protection-policy">https://www.inverclyde.gov.uk/law-and-licensing/freedom-of-information/data-protection-policy</a></p> <p>The <i>Plan</i> quotes, in evidence, the Data Protection Policy of NHS Greater Glasgow and Health. This pertains to NHS staff who are creating IJB records on Council systems (see ‘explanation’ above).</p> <p>All HSCP (including IJB) staff undertook data protection training in 2018. The Keeper has already agreed that the data protection training in Inverclyde Council is appropriate (November 2015). The IJB have noted a suite of Council data protection training in the evidence column against this element.</p> <p>The Keeper agrees that Inverclyde 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 Continuity and Vital Records	<b>G</b>	<b>G</b>	<p>The Keeper would expect an authority’s Records Management Plan to include arrangements for record recovery, prioritising vital records, as an integral part of the authority’s business continuity planning.</p> <p>The public records of Inverclyde Integration Joint Board are managed digitally on</p>



			<p>the systems operated by Inverclyde Council and as such would be subject to the record recovery arrangements of the Council.</p> <p>This is acknowledged in an <i>MoU</i> between the IJB and the Council which states: “The IJB’s records are managed in accordance with the Council’s Business Continuity and vital records arrangements.” (<i>MoU</i> section 1.6)</p> <p>The Plan (page 21) confirms: “All services will continue to be provided or commissioned directly by Inverclyde Council. As such there is no direct requirement for the IJB to have its own arrangements for business continuity of vital records.”</p> <p>In November 2015 the Keeper agreed that Inverclyde Council has approved and operational business continuity arrangements in place and that these include the recovery of records. Furthermore he agrees that the arrangements in place identify records that are ‘vital’ to the business activities of the authority.</p> <p>The Keeper therefore agrees that Inverclyde 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 public records of Inverclyde Integration Joint Board are managed under the procedures of Inverclyde Council.</p> <p>The Keeper has been provided with a <i>MoU</i> between the IJB and the Council which states: “The Council’s Audit Trail arrangements will ensure that records are retrievable and offer certainty around version control.” (<i>MoU</i> section 1.6)</p> <p><b>In November 2015 the Keeper agreed this element of the Inverclyde Council Records Management Plan. However he did so under ‘Improvement Model’</b></p>

			<p>terms. This means that he acknowledges that the Council had identified a gap in provision [audit/tracking facility not available for all record types] and had put processes in place to close that gap. The Keeper's agreement was conditional on his being updated on progress as the project develops. The Council did this in 2019 and at that time the Keeper's Assessment Team confirmed that this element remained at 'amber' as the improvement work progressed.</p> <p>The Keeper agrees this element of the Inverclyde Integration Joint Board's <i>Records Management Plan</i> under the same 'improvement model' terms as its 'host' authority.</p>
<p>12. Competency Framework for records management staff</p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>The Keeper would expect to see evidence that staff creating, or otherwise processing records, are appropriately trained and supported.</p> <p>Inverclyde Integration Joint Board list, as a records management principle, that: all staff are informed of their record-keeping responsibilities through appropriate training and guidance and if required further support as necessary (<i>Plan</i> page 4). The Keeper commends this recognition.</p> <p>The Keeper has been provided with a MoU between the IJB, the council and the health board which states that: "The nominated officers within the Council and the Board will have operational responsibility and are able to access these policies and procedures, as well as undergo appropriate training, e.g. Data Protection, Information Security, etc." <i>MoU</i> section 1.6</p> <p>The Keeper has already agreed that Inverclyde Council staff have appropriate training and support. Furthermore, the <i>Plan</i> notes that all HSCP (including IJB)</p>

			<p>staff undertook data protection training in 2018.</p> <p>The RMP notes that on occasion NHS Greater Glasgow and Clyde staff will create IJB records on Council systems. All staff must complete their statutory/mandatory training from both partner organisations as part of their induction and before gaining access to partner organisations systems: NHS – Information Governance; Inverclyde Council - Data Protection – GDPR, Information Governance, Information Security.</p> <p>The Keeper agrees that Inverclyde Integration Joint Board considers information governance training for its staff as appropriate.</p>
<p>13. Assessment and Review</p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>The Public Records Act 2011 requires scheduled public authorities to “keep its records management plan under review” (part 1 5.1 (a)).</p> <p>Inverclyde Integration Joint Board commit to reviewing their <i>Records Management Plan</i> annually (<i>Plan</i> page 2).</p> <p>As all the public records of the IJB are managed digitally on Inverclyde Council systems the IJB relies on the Council to review the operation of these systems and reported back to the IJB through the Council’s Information Governance Steering Group.</p> <p>This arrangement is confirmed by the <i>MoU</i>:          “The IJB will rely on the Council to ensure that the systems, policies and procedures that govern its records are being regularly assessed. An annual review will be undertaken by a group nominated by the IJB to ensure this is being done effectively.” (<i>MoU</i> 1.6). The Keeper notes and commends the involvement of the</p>

			<p>IJB at the outset.</p> <p>The Keeper has agreed that the Inverclyde Council review processes are appropriate (November 2015).</p> <p>The Keeper agrees that Inverclyde Integration Joint Board has installed a formal review procedure as part of their records management plan as required by the Act, and that clear review periods and reporting structures have been provided.</p>
<p>14. Shared Information</p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>The Keeper expects 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, Inverclyde Integration Joint Board shares information with other bodies when appropriate and does so under information sharing processes of Inverclyde Council.</p> <p>These are explained in detail in the compliance statement under this element in the <i>Plan</i>.</p> <p>The Keeper has previously agreed that the information sharing provision of Inverclyde Council is appropriate (November 2015).</p> <p>On page 25 of the <i>Plan</i> the IJB refers to the <i>HSCP Information Sharing Policy</i>. The Keeper confirms that he has been provided with a copy of this policy.</p> <p>The Keeper agrees that Inverclyde Integration Joint Board appropriately considers information governance when planning data sharing with third parties.</p>



## **Inverclyde Integration Joint Board (For simplicity referred to as ‘the IJB’ in the assessment)**

### **General Notes on submission:**

This assessment is on the Records Management Plan (the *Plan*) of Inverclyde Integration Joint Board version 1.0 as submitted to the Board 29<sup>th</sup> January 2019 with subsequent textual updates for clarification.

The submission to the Keeper included the *Plan a Committee Covering Paper* and a *Memorandum of Understanding (MoU)* between Inverclyde Integration Joint Board, Inverclyde Council and Greater Glasgow and Clyde Health Board. This *MoU* supports the arrangements detailed in the explanation above.

The introduction to the *Plan* 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.

The *Plan* 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:

**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).

This is recognised in the *Plan* where the IJB specifically confirms in the introductory text that they do not contract out records creation or management to third parties (Plan page 1).

## 6. Keeper's Summary

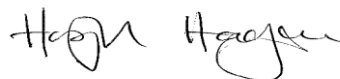
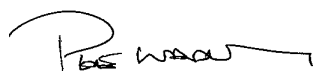
Elements 1 – 14 (+ a Third Party Compliance statement) that the Keeper considers should be in a public authority records management plan have been properly considered by Inverclyde Integration Joint Board. Policies and governance structures are in place to implement the actions required by the plan.

## 7. Keeper's Determination

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

- The Keeper recommends that Inverclyde 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

.....  
**Hugh Hagan**  
Senior 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 Inverclyde Integration Joint Board. In agreeing this RMP, the Keeper expects Inverclyde Integration Joint Board to fully implement the agreed RMP and meet its obligations under the Act.



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