

Public Records (Scotland) Act 2011

**NHS Dumfries and Galloway
Assessment Report**

The Keeper of the Records of Scotland

21st March 2017

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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 **NHS Dumfries and Galloway** by the Public Records (Scotland) Act 2011 Assessment Team following its submission to the Keeper on **31st March 2016**.

The assessment considered whether the RMP of NHS Dumfries and Galloway 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 NHS Dumfries and Galloway complies with the Act can be found under section 7 of this report with relevant recommendations.

3. Authority Background

NHS Dumfries and Galloway serves a population of 150,000 but within a large geographical area of about 2,400 square miles. Dumfries and Galloway stretches from Langholm in the East to Drummore in the West, and from Kirkconnel and Carsphairn in the North down to Sandyhills on the Solway Coast. The Health Board employs around 4500 staff excluding GPs and Dentists.

Dumfries and Galloway Royal Infirmary is based in Dumfries and is the main hospital for the region providing a wide range of inpatient and outpatient health services. The Galloway Community Hospital serves Stranraer and the west of the region, is an intermediate unit providing maternity services, and medical & surgical beds. There are bedded units within eight cottage hospitals which provide care services such as minor injuries units. Midpark Hospital provides inpatient facilities for mental health patients.

NHS Dumfries and Galloway is comprised of directorates which includes Nursing, Midwifery and Allied Health Professionals (Occupational Therapists, Physiotherapists etc.), Medical, Finance, Workforce, Public Health, Commissioning and Strategic Planning

and Health Services. The Board itself is led by the Chair, Mr Philip Jones, and the Chief Executive and comprises of executive team of four directors, there are ten appointed non-executive members, which include the chair, an Employees Director, Chair of the Area Clinical Forum and local authority representative.

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 NHS Dumfries and Galloway'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

NHS Dumfries and Galloway

Element	Present	Evidence	Notes
1. Senior Officer <i>Compulsory element</i>	G	G	<p>NHS Dumfries and Galloway have identified Jeff Ace, Chief Operating Officer as the individual with overall responsibility for records management in the authority.</p> <p>This is confirmed by the 2016 Scheme of Delegation (supplied).</p> <p>Mr Ace's overall responsibility is stated in a <i>Covering Letter</i> from Mr Ace himself, submitted with the <i>Records Management Plan</i>, by the <i>Data Protection Policy</i> (see element 9) section 10b and by the <i>Records Management Policy</i> (see element 3) section 3b</p> <p>The Keeper agrees that NHS Dumfries and Galloway have identified an appropriate individual to this role as required by the Act.</p>
2. Records Manager <i>Compulsory element</i>	G	G	<p>NHS Dumfries and Galloway have identified Laura Geddes, Corporate Business Manager, as the individual with day-to-day responsibility for implementing the <i>Plan</i> in the authority.</p> <p>Ms Geddes <i>Job Description</i> has been submitted and this shows that the Corporate Business Manager is also the Corporate Records Manager.</p>

			<p>The statement supporting element 1 of the <i>Plan</i> confirms that the Corporate Records Manager supports the Medical Director in his information governance responsibilities (<i>Plan</i> page 6).</p> <p>In her role as Corporate Business Manager, Ms Geddes sits on the Information Assurance Committee (see under General Comments below).</p> <p>Ms Geddes is co-author of the <i>Document Development and Approval Policy</i>.</p> <p>Ms Geddes approved the <i>Memorandum of Understanding for the Archival of the NHS Dumfries & Galloway Archive Collection with the Dumfries & Galloway Council Archivist</i></p> <p>The Keeper agrees that Ms. Geddes is an appropriate individual to be identified to this role.</p>
3. Policy <i>Compulsory</i> element	G	G	<p>The <i>Scottish Government Records Management NHS Code of Practice</i> requires “Each NHS organisation should have in place an overall policy statement, endorsed by the Board and made readily available to staff at all levels of the organisation on induction and through regular update training, on how it manages all of its records, including electronic records.” (para 36).</p> <p>NHS Dumfries and Galloway have a <i>Health & Administration Records Management Policy</i>, based on the above <i>Code of Practice</i>, which has been supplied to the Keeper. This is version 1.3 approved by the Management Team February 2016.</p> <p>This <i>Policy</i> sets out the information governance aims of the authority (section 2), explains the purpose of robust records management (section 3) and sets out the retention decisions for clinical and administrative records (see element 5).</p>

			<p>A screen-shot has been provided as evidence that this policy is available on the NHS Dumfries and Galloway intranet 'Hippo'.</p> <p>The Keeper agrees that the <i>Plan</i> supports the objectives of the <i>Policy</i>.</p> <p>The Policy mentions the Public Records (Scotland) Act 2011.</p> <p>The Keeper agrees that NHS Dumfries and Galloway have a records management policy statement as required by the Act and that this is available to staff.</p>
4. Business Classification	A	G	<p>The introduction to the <i>Plan</i> states that "systematic management of records allows organisations to know what records they have and locate them easily." (<i>Plan</i> page 4).</p> <p>The <i>Records Management Policy</i> (see element 3) sets out the aim of establishing a <i>Business Classification Scheme</i> (section 2.a.vii).</p> <p>To this end, NHS Dumfries and Galloway is developing a <i>Classification Scheme</i> based on its statutory functions and drawing on the NHS Scotland template.</p> <p>This must remain a business decision for an authority but the Keeper acknowledges that a <u>functional</u> scheme is currently considered best practice.</p> <p>The <i>Business Classification Scheme</i> will be created "in partnership with each division and function" (<i>Business Classification Scheme Framework</i> page 3). The Keeper commends the use of local service areas in this work as liable to increase 'buy-in' and result in stronger and more accurate business tool.</p> <p>The <i>Plan</i> makes it clear that the authority has set itself targets to complete the <i>Business Classification Scheme</i> in 2016-18 and then roll it out to departments (the</p>

			<p>implementation phase) over the next two years. The Keeper agrees that, with an organisation the size of NHS Dumfries and Galloway, it is inevitable that progress will be made on an incremental basis. However, the Keeper will expect to see continual progress over the next year or so.</p> <p>NHS Dumfries and Galloway have submitted their <i>Business Classification Scheme Framework</i> document which explains the intended structure of the Business Classification Scheme and the purpose of the work. The <i>Framework</i> makes clear how it will be used to inform the file plan structure in local areas and shows the top level architecture. It also makes clear that central control will be retained on top level folder structure by limiting changes to the Corporate Records Manager (see element 2). The Keeper agrees that the Framework represents an appropriate way forward for NHS Dumfries and Galloway.</p> <p>Also, see Information Asset Register under General Comments below.</p> <p>The Keeper agrees this element of NHS Dumfries and Galloway's records management plan under 'improvement model' terms. This means that the authority has identified a gap in provision (a full business classification scheme has not yet been rolled-out in the organisation) and have put measures in place to close that gap. The Keeper's agreement is conditional on him receiving updates as the BCS project progresses. NHS Dumfries and Galloway have committed to do this.</p>
5. Retention schedule	G	G	<p>NHS Dumfries and Galloway have full <i>Retention Schedules</i> for clinical and for administrative records.</p> <p>These are based on the <i>Scottish Government NHS Code of Practice</i> published on the NHS Dumfries and Galloway website and at http://www.gov.scot/Publications/2012/01/10143104/0.</p>

			<p>Staff instructions on operating the <i>Schedule</i> are supplied in <i>Health & Administration Records Management Policy</i> which has been supplied to the Keeper (see element 3). The full retention schedule for clinical records is at sections 7 – 19 and administrative records at 20 – 27. For example records of donors are kept for the lifetime of the recipient (clinical) and boiler inspection reports are kept for 2 years after the lifetime of the boiler (administration).</p> <p>The Keeper agrees that NHS Dumfries and Galloway have an approved and operational retention schedule that covers the expected record types created by a territorial health board.</p>
6. Destruction Arrangements <i>Compulsory element</i>	A	G	<p>The <i>Records Management Policy</i> (see element 3) states as an aim “establish, as part of the Information Assurance Strategy, Records Management best practice in relation to the...disposal of NHS Dumfries & Galloway records.” The Board has the following procedures in place:</p> <p>Paper (internal): Paper: Paper records are destroyed under contract with a third party shredding company. A contract, proving that these arrangements are operational, has been supplied as evidence.</p> <p>Paper (external): Under element 7 NHS Dumfries and Galloway mentions third party storage. On this issue the authority has stated “A new project to recover records stored off site has just begun. Records will be reviewed, scanned and the original paper copies destroyed in accordance with guidance received from the NHS Central Legal Office. The project end date is still to be confirmed.” The Keeper agrees this action but requires updates as the project progresses.</p> <p>Electronic: NHS Dumfries and Galloway provide instructions for staff on the</p>

			<p>procedure for permanent deletion of clinical records in section 6 of the <i>Policy</i> (see element 3). However, the Scottish Government COP for NHS Records Management which NHS Dumfries have adopted does not include these instructions for the destruction of administrative records. The NHS Dumfries and Galloway policy will be updated to include reference to the procedure to be followed for non-clinical records. This will be done after the new Scottish Government COP for NHS Records Management has been published later in 2017. The Keeper requires an updated version as soon as it is available.</p> <p><u>Hardware:</u> NHS Dumfries and Galloway destroys electronic media using a contract with a third party. The contract, proving that these arrangements are in place, has been provided to the Keeper as evidence.</p> <p><u>Backups:</u> The Board, quite properly, take back-up copies of records for business continuity reasons. This is explained in their Plan page 22 "All records held on NHS Dumfries & Galloway networks are synchronously replicated to a remote copy to provide a Recovery Point Objective (RPO) of 0 seconds." Daily backups are performed with backups being retained for 18 months as per Board guidelines. Records deleted from a Board system are deleted from the next backup.</p> <p>The Keeper agrees this element of NHS Dumfries and Galloway's <i>Records Management Plan</i> on 'improvement model' terms. This means that the authority has identified gaps in provision (instructions on deletion of electronic administrative records are wanting and a project to scan records held in a third-party outstore is not complete). However, the Keeper is convinced of a commitment to close these gaps. His agreement is conditional on being updated as these projects progress.</p>
7. Archiving and Transfer	G	G	As required by the <i>Records Management Policy</i> (see element 3), NHS Dumfries and Galloway transfers records of historical value for permanent preservation to an

<i>Compulsory element</i>			<p>archive.</p> <p>They have selected Dumfries and Galloway Council's archive service as a proper repository for health board records.</p> <p>The Keeper has been provided with a <i>Memorandum of Understanding for the Archival [sic] of the NHS Dumfries & Galloway Archive Collection with the Dumfries & Galloway Council Archivist</i>.</p> <p>The Keeper agrees that NHS Dumfries and Galloway have identified a suitable repository for the permanent preservation of historically important records and have arrangements in place to transfer records to that repository.</p>
8. Information Security <i>Compulsory element</i>	G	G	<p>NHS Dumfries and Galloway have an <i>Information Security Policy</i> which has been supplied to the Keeper. This is version 1.3 approved by the Information Assurance Committee (see under General Comments below) August 2013.</p> <p>The <i>Information Security Policy</i> is published at: http://www.nhsdg.scot.nhs.uk/Resources/Publications/Policies/Information_Security_Policy.pdf</p> <p>The <i>Information Security Policy</i> is supported by a suite of other policies and guidance such as their <i>Acceptable Use of Email Policy</i> – “to protect all NHS Dumfries & Galloway users from threats, internal or external, deliberate or accidental” - and the <i>Access to Information Systems Policy</i>. These supporting documents have also been provided to the Keeper.</p> <p>A screen-shot has been provided as evidence that these policies are available on the NHS Dumfries and Galloway intranet ‘Hippo’.</p>

			<p>The Keeper agrees that NHS Dumfries and Galloway have procedures in place that appropriately ensure information security in the authority.</p>
9. Data Protection	G	G	<p>NHS Dumfries and Galloway have a <i>Data Protection Policy</i> which has been supplied to the Keeper. This is version 1.3 approved by the Information Assurance Committee (see under General Comments below) March 2014.</p> <p>The Policy states: "NHS Dumfries & Galloway fully understands that it has obligations to ensure that personal information is treated fairly, lawfully and correctly, and is committed to achieving compliance with the laws of the Data protection Act 1998".</p> <p>The <i>Data Protection Policy</i> is published at: http://www.nhsdg.scot.nhs.uk/Resources/Publications/Policies/Data_protection_policy.pdf</p> <p>The <i>Data Protection Policy</i> explains the (current) 8 principles of data protection.</p> <p>Subject access is promoted through the <i>Data Protection Policy</i> and through a publically available on-line guidance document <i>Subject Access Request to Personal Health Records Under the Data Protection Act (1998)</i> which has been supplied to the Keeper.</p> <p>A screen-shot has been provided as evidence that this policy is also available on the NHS Dumfries and Galloway intranet 'Hippo'.</p> <p>The authority is registered with the Information Commissioner: Z6162267.</p>

			<p>The <i>Records Management Policy</i> (see element 3) features repeated reference to data protection issues and gives a specific data-breach example for edification of staff (<i>Policy</i> section 1.c.ii)</p> <p>The <i>Data Protection Policy</i> explains the relationship between data protection and freedom of information (section 9). The Keeper commends this useful inclusion in a document designed for use by the public.</p> <p>The Keeper agrees that NHS Dumfries and Galloway have properly considered their responsibilities under the Data Protection Act 1998.</p>
10. Business Continuity and Vital Records	A	G	<p>The introduction to the <i>Plan</i> states that “systematic management of records allows organisations to provide continuity in the event of a disaster.” (<i>Plan</i> page 4).</p> <p>The <i>Plan</i> goes on to state that “NHS Dumfries & Galloway has corporate, departmental and site Business Recovery/Continuity Plans.” (<i>Plan</i> page 22). This is confirmed in the <i>Information Security Policy</i> (section 4.f and 5.c).</p> <p>NHS Dumfries and Galloway have provided the Keeper with their <i>Business Continuity Management Overview and Framework</i>. This is version 4.1 approved in February 2016. The Keeper agrees that this <u>corporate</u> continuity plan considers the recovery of records (for example page 10).</p> <p>NHS Dumfries and Galloway have also supplied a sample of a local <i>Business Community Plan</i> and the Keeper agrees that it covers recovery of records under the section “What information do you need to do your job, and where is it held?”</p> <p>NHS Dumfries and Galloway operate a ‘real time recovery’ system for all electronic records (explained in the <i>Plan</i> page 22). This system obviates the need to identify vital electronic records (as they are all recovered at once). However a project to</p>

			<p>identify NHS D&G vital records will run for the next 12-18 months. The document ‘Identifying Vital Records’ will be used by departments to assess and classify their records. The Keeper commends this project.</p> <p>The Keeper agrees this element of NHS Dumfries and Galloway’s <i>Records Management Plan</i> on ‘improvement model’ terms. This means that the authority has identified a gap in provision (the project to identify vital records is not competed) but have put processes in place to close that gap. The Keeper’s agreement is conditional on him being updated as the project proceeds.</p>
11. Audit trail	A	G	<p>The introduction to the <i>Plan</i> states that “systematic management of records allows organisations to know what records they have and locate them easily.” (<i>Plan</i> page 4).</p> <p>Location of records (and the identification of versions) lies at the core of element 11 ‘Audit Trail’.</p> <p>The Keeper agrees that line of business systems operated by the authority have tracking functionality. An example has been provided to the Keeper of how one of these (TOPAS) appears in practice.</p> <p>A project to implement a paper registry is under way. The Keeper has been supplied with evidence of documents from ‘pilot’ department.</p> <p>The Keeper notes that there is an action point against this element to add version control instructions to the <i>Policy</i>.</p> <p>The Keeper agrees this element of NHS Dumfries and Galloway’s <i>Records Management Plan</i> on ‘improvement model’ terms. This means that the</p>

			authority has identified gaps in provision (version control/naming convention guidance is not yet issued to all record creators and the paper registry is not operational). However, the Keeper is convinced of a commitment to close these gaps. His agreement is conditional on being updated as these projects progress.
12. Competency Framework for records management staff	G	G	<p>The SG NHS Code of Practice states (section 3) that “the records management function should be recognised as a specific corporate responsibility within every NHS organisation. It should provide a managerial focus for records of all types in all formats, including electronic records, throughout their lifecycle, from planning and creation through to ultimate disposal. It should have clearly defined responsibilities and objectives, and necessary resources to achieve them”.</p> <p>Ms Geddes’ <i>Job Description</i> and <i>Personal Learning Plan</i> (both shared with the Keeper) clearly show that she has responsibility for records management in the authority and appropriate training resources to support this role. As she reports directly to NHS Dumfries and Galloway’s CEO it can be accepted that she has the relevant authority to implement the agreed plan.</p> <p>The <i>Information Assurance Strategy</i> notes “training and awareness” as an area “key to delivering successful information assurance.”</p> <p>NHS Dumfries and Galloway have a strong system for communicating information governance issues to their staff. Samples of these communications have been provided to the Keeper (for example posters, presentations and a sample payslip drop). The Keeper commends this awareness-raising approach and thanks NHS Dumfries and Galloway for sharing these with him.</p> <p>All staff must undergo mandatory information security and data protection training. The authority specifically commits to providing Data protection Act training in 1.d of</p>

			<p>the <i>Data Protection Policy</i> (see element 9). Data protection training is refreshed every two years.</p> <p>Line managers are responsible for ensuring their staff have undertaken the relevant training.</p> <p>The Keeper agrees that the individual identified at element 2 above has the required skills, responsibilities and training opportunities to undertake the implementation role and, furthermore, he agrees that NHS Dumfries and Galloway has considered information governance training for appropriate staff.</p>
13. Assessment and Review	G	G	<p>The Act requires a scheduled public authority to “keep its records management plan under review” (part 1 5.1 (a)). The NHS Dumfries and Galloway <i>Plan</i> states that it will be “reviewed annually or earlier if required” (page 5).</p> <p>The <i>Records Management Policy</i> (see element 3) indicates that responsibility for ensuring the implementation of the plan will fall to “Those responsible for monitoring NHS Dumfries & Galloway performance (e.g. Internal and External Audit)” (<i>Policy</i> section 1.c.iii)</p> <p>The <i>Plan</i> makes it clear that arrangements for review are in place:</p> <p>The Corporate Records Manager (see element 2) will arrange review of elements of the <i>Plan</i> using an already established information governance audit. Results of this audit will be reported to the Information Assurance Committee (see under General Comments below). A schedule of review dates has been provided to the Keeper as evidence that this process is embedded in the authority.</p> <p>The addition of the <i>Plan</i> is acknowledged in the minutes of the NHS Dumfries and Galloway Audit and Risk Committee dated September 2015 (provided).</p>

		<p>The Keeper also acknowledges that policies and procedures submitted in evidence have review dates included in their control sheets and commends this:</p> <p>The <i>Information Assurance Strategy</i> is due for review by December 2020.</p> <p>The <i>Information Security Policy</i> (see element 8) and the <i>Intranet and Internet Acceptable Use Policy</i> are currently under review.</p> <p>The <i>Memorandum of Understanding for the Archival of the NHS Dumfries & Galloway Archive Collection with the Dumfries & Galloway Council Archivist</i> (see element 7) and the <i>Business Classification Scheme Framework</i> is due for review by March 2017.</p> <p>The <i>Document Development and Approval Policy</i> is due for review by October 2017.</p> <p>The <i>Data Protection Policy</i> (see element 9) is due for review by December 2017.</p> <p>The <i>Operating Procedure for the Recycling, Destruction Condemnation and Disposal of Assets and Stock</i> instructions are due for review in 2017.</p> <p>The <i>Information Systems Procurement, Development and Deployment Procedures</i> guidance is due for review by January 2018.</p> <p>The <i>Policy</i> (see element 3) the <i>Acceptable Use of Email Policy</i>, the <i>Access to Information Systems Policy</i>, the <i>Approved Information Systems Devices Policy</i>, the <i>Safe Information Handling Policy</i> and the <i>Instructions for the Secure Disposal of Redundant IT Equipment and Related Items</i> document are due for review by February 2018.</p>
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			<p>The <i>Scheme of Delegation</i> is due for review in April 2017.</p> <p>NHS Dumfries and Galloway's registration with the Information Commissioner (see element 9) must be renewed before 09 December 2017.</p> <p>The Keeper agrees that NHS Dumfries and Galloway have identified a review date for their <i>Plan</i> and have explained how this review will take place.</p>
14. Shared Information	G	G	<p>The RMP states that NHS Scotland undertakes information sharing on a routine basis in line with the Data Protection Act 1998.</p> <p>NHS Dumfries and Galloway enters into data sharing agreements using the Scottish Accord for the Sharing of Personal Information (SASPI). Their partners in this accord are Dumfries & Galloway Council, Police Scotland and Scottish Fire and Rescue Service. A copy of the Accord has been submitted as evidence and is dated November 2012.</p> <p>NHS Dumfries and Galloway has also submitted a sample <i>Information Sharing Protocol</i> developed using SASPI guidelines.</p> <p>The Keeper agrees that NHS Dumfries and Galloway properly consider information governance when entering into arrangements to share information with third parties.</p>

NHS Dumfries and Galloway

General Notes on RMP, Including Concerns:

Version:

This assessment is on the *Records Management Plan* (the *Plan*) of NHS Dumfries and Galloway v1.0 dated April 2016.

The *Plan* contains an 'action plan' element in a column against each element.

The *Plan* is accompanied by a *Covering Letter* of endorsement from the Chief Executive (**see element 1**) who personally approved it.

The introduction to the *Plan* (page 3) commits the Board to publish the agreed version to their website. **The Keeper strongly commends this and asks that he is informed when this has been done so that he may provide a link from his own site.**

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 Act makes it clear that records created by a contractor in carrying out a scheduled authority's functions are public records (Part 1 section 3.1 (b)).

At several points the *Plan* and policies submitted in evidence correctly indicates that clauses therein apply to third parties carrying out the functions of NHS Dumfries and Galloway under contract. Private Hospitals are specifically mentioned (For example *Policy 1.d.i*)

An extract from an example of a current 3rd party contract has been supplied showing how this is imposed

Information Assurance Committee

This committee, chaired by the authority's SIRO and Caldicott Guardian and including Ms Geddes (**see element 2**), is responsible for "monitoring and reviewing the ongoing effectiveness and accuracy of the NHS Dumfries and Galloway RMP". The will oversee the development of the *Business Classification Scheme* (**see element 4**) and are responsible for overseeing compliance with information governance standards generally (*Information Assurance Strategy section 5*) and information security policies specifically. The Committee reports to the Board's Governance Committee.

The Keeper has been provided with NHS Dumfries and Galloway's *Information Assurance Strategy* and I. A. Committee Minutes.

The Committee is set up as a requirement expressed in the *Records Management Policy* (**see element 3**) section 6.d.ii. The Committee has "corporate, clinical and delivery representation to ensure that IA is embedded within the organisational structure."

The Committee approved several of the evidential documents (for example the *Data Protection Policy* (**see element 9**)).

This group is clearly of fundamental importance to records management in the authority and the Keeper thanks NHS Dumfries and Galloway for including information about its work in their submission.

Information Asset Register

NHS Dumfries and Galloway's *Data Protection Policy* refers to the authority having an *Information Asset Register* (IAR) (sections 7e and 10a). The text goes on to explain that this register "will identify information assets, where it is held, how it is processed, who has access to it and the retention policy to be used for the information stored." On this issue NHS Dumfries and Galloway state: "Project to develop a list of NHS D&G systems into a comprehensive Information Asset Register is about to begin (see comment J29). This is expected to take 12-15 months to complete" The Keeper commends this project and asks that he is updated as it progresses.

6. Keeper's Summary

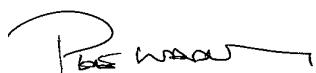
Elements 1 -14 that the Keeper considers should be in a public authority records management plan have been properly considered by NHS Dumfries and Galloway. Policies and governance structures are in place to implement the actions required by the plan.

7. Keeper's Determination

Based on the assessment process detailed above, the Keeper **agrees** the RMP of **NHS Dumfries and Galloway**.

- The Keeper recommends that NHS Dumfries and Galloway 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 NHS Dumfries and Galloway. In agreeing this RMP, the Keeper expects NHS Dumfries and Galloway to fully implement the agreed RMP and meet its obligations under the Act.

A handwritten signature in black ink, appearing to read "Tim Ellis".

.....
Tim Ellis
Keeper of the Records of Scotland