

## **Public Records (Scotland) Act 2011**

### **North Ayrshire Integration Joint Board**

### **The Keeper of the Records of Scotland**

**1<sup>st</sup> April 2021**

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## 1. Public Records (Scotland) Act 2011

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

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

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

## 2. Executive Summary

This report sets out the findings of the Keeper's assessment of the RMP of North Ayrshire Integration Joint Board by the Public Records (Scotland) Act 2011 Assessment Team following its submission to the Keeper on 25<sup>th</sup> February 2019.

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

## 3. Authority Background

**Description of Authority:** North Ayrshire IJB is the constituted legal governing body of North Ayrshire Health and Social Care Partnership. It is responsible for the strategic direction, effectiveness, and efficiency of the Partnership. The IJB has delegated responsibilities by North Ayrshire Council and NHS Ayrshire & Arran. Their integration scheme describes their responsibilities:

<http://nahscp.org/wp-content/uploads/2020/03/NA-Integration-Scheme-Updated-1-3-15-Carers-Act.pdf>

IJB membership reflects the multi-agency partnership working approach and includes carers and people who use their services.

IJB governance ensures accountability, transparency and effective efficient working.

IJB receives reports from a range of different strategic groups. IJB also reports to partner agencies, including Scottish Government.

<http://nahscp.org/the-ijb/>

## 4. Keeper's Assessment Process

The RMP was assessed by the Public Records (Scotland) Act Assessment Team on behalf of the Keeper. Assessors used the checklist elements listed in section 5, to establish whether North Ayrshire 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:

<b>G</b>	The Keeper agrees this element of an authority's plan.		<b>A</b>	The Keeper agrees this element of an authority's plan as an 'improvement model'. This means that he is convinced of the authority's commitment to closing a gap in provision. He will request that he is updated as work on this element progresses.		<b>R</b>	There is a serious gap in provision for this element with no clear explanation of how this will be addressed. The Keeper may choose to return the RMP on this basis.
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**North Ayrshire Integration Joint Board  
(‘The IJB’ in the assessment below)**

**Explanation: All public records of the North Ayrshire Integration Joint Board are held on North Ayrshire Council systems and, as this is the case, the IJB must adopt the records management provision of the Council. This is made clear in the *Records Management Plan* (for example page 6) and in a *Covering Letter* from the Chief Executive of North Ayrshire Council.**

**“It has been identified whilst engaging with the Records Management Plan process that currently all North Ayrshire Integration Joint Board records are held within North Ayrshire Council’s systems and offices.” (*Covering Letter from North Ayrshire Council CEO* – see under General Comments below).**

**The Keeper agreed the *Records Management Plan* of North Ayrshire Council in July 2015:**

<https://www.nrscotland.gov.uk/files//record-keeping/public-records-act/keepers-assessment-report-north-ayrshire.pdf>

**In 2017 North Ayrshire Council provided the Keeper with an update on their RMP:**

<https://www.nrscotland.gov.uk/files//record-keeping/public-records-act/pur-final-report-for-north-ayrshire-council-and-licensing-board.pdf>

## 5. Model Plan Elements: Checklist

Element	Present	Evidence	Notes
1. Senior Officer	<b>G</b>	<b>G</b>	<p>North Ayrshire Integration Joint Board (the IJB) have identified Caroline Cameron Chief Officer, as the individual with overall responsibility for records management in the authority.</p> <p>This is confirmed by a <i>Covering Letter</i> from the Chief Officer:                      “As the Chief Officer I confirm that I have overall responsibility for the North Ayrshire Integration Joint Board Records Management Plan which has my full support and that of the Integration Joint Board members.”</p> <p>The <i>Covering Letter</i> from Mrs Cameron also confirms the records management arrangements with the Council explained above.</p> <p>The IJB’s Chief Officer is also the IJB’s Senior Information Risk Owner (SIRO).</p> <p>The Keeper agrees that North Ayrshire 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>The Act requires that each authority identifies an individual staff member as holding operational responsibility for records management and has appropriate corporate responsibility, access to resources and skills.</p> <p>North Ayrshire Integration Joint Board have identified Lauren Lewis, Information Management Officer North Ayrshire Council, as the individual with day-to-day responsibility for implementing the <i>Records Management Plan</i> (the <i>Plan</i>) in the authority.</p>

			<p>This is confirmed by a <i>Covering Letter</i> from the Chief Officer, which has been supplied to the Keeper.</p> <p>All the public records of the IJB are stored and managed on North Ayrshire Council systems (see explanation above and element 4 below). Ms. Lewis is the Council Records Manager and as such has full access to the IJB’s public records. In 2015 the Keeper agreed that the Information Management Officer was a suitable individual to take on this role for North Ayrshire Council (this was a previous post-holder).</p> <p>The Keeper agrees that the Council’s Information Management Officer is an appropriate individual to be identified to this role.</p>
3. Policy	<b>G</b>	<b>G</b>	<p>The Act requires an authority to have an appropriate policy statement on records management.</p> <p>The <i>Plan</i> states that “The Board has adopted and is fully committed to the Records Management Policy of North Ayrshire Council. All Officers who have access to IJB records are governed by North Ayrshire Council’s policies and procedures relating to records management.”</p> <p>As all the public records of the IJB are managed on the systems of North Ayrshire Council, the adoption of the Council’s <i>Records Management Policy</i> is entirely suitable.</p> <p>This arrangement has been agreed by North Ayrshire Council. A <i>Covering Letter</i> from the Chief Executive of the Council, addressed to the Keeper, confirms: “The North Ayrshire Integration Joint Board is bound by the records management policies, strategies and frameworks as stipulated under Element 3 in North Ayrshire</p>



			<p>Council’s Records Management Plan.”</p> <p>In July 2015, the Keeper agreed that the <i>Records Management Policy</i> of North Ayrshire Council was appropriate for the robust management of their public records. He also was provided with evidence that the <i>Policy</i> is available to staff through the Council’s intranet, Navigate. As all IJB staff have automatic access to the intranet, the Keeper is satisfied that they have access to the <i>Policy</i>.</p> <p>The Keeper agrees that North Ayrshire Integration Joint Board has adopted an operational policy which sets out the corporate approach to records management as required by the Act.</p>
<p>4. Business Classification</p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>The Keeper of the Records of Scotland (the Keeper) expects that the public records of an authority are known and are identified within a structure.</p> <p>The <i>Plan</i> explains that “The Board’s records will be wholly created and managed on North Ayrshire Council systems. The Council has a comprehensive and in-depth Information Asset Register (IAR) which is based on the Local Government Classification Scheme (<i>Plan</i> page 6).</p> <p>This is confirmed by a <i>Covering Letter</i> from the Chief Officer of the IJB: “...records will be managed in accordance with North Ayrshire Council policies and procedures...” and the arrangement agreed by the Chief Executive of North Ayrshire Council: “All records created by the North Ayrshire Integration Joint Board are held within North Ayrshire Council’s networks and systems and as such, are managed using the Local Government Classification Scheme (LGCS).” (<i>Covering Letter</i> from NAC Chief Executive)</p> <p>The IJB have confirmed that all their public records are managed in digital format. The Keeper has been provided with a screen-shot from the relevant section of the</p>

			<p>Council's IAR.</p> <p>The Keeper agrees that North Ayrshire Integration Joint Board have ensured that their records are managed within an appropriate structure as required.</p>
<p>5. Retention schedule</p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>The Keeper expects an authority to have allocated retention periods to its public records and for those records to be retained and disposed of in accordance with a retention schedule.</p> <p>As explained under element 4, the <i>Plan</i> makes it clear that the public records of the IJB are held in the record keeping systems of North Ayrshire Council.</p> <p>The Keeper agrees it entirely appropriate therefore that those records are subject to the retention and destruction processes of the Council.</p> <p>However, whereas the <i>Plan</i> states (page 7) that “IJB records are maintained in line with North Ayrshire Council Retention and Disposal Schedules...” The Covering Letter from the Chief Executive of the Council states “North Ayrshire Council’s records retention schedule <u>will</u> be updated to reflect the incorporation of North Ayrshire Integration Joint Board records [our emphasis]. However, the Keeper has now been supplied with evidence showing that, since the original submission in 2019, the Council’s retention schedule has been appropriately updated to include records created by the IJB.</p> <p>The Keeper notes that the current retention schedule of North Ayrshire Council is under review as part of a separate project and any retention(s) applicable to the Integration Joint Board will be reworded to reflect any change as appropriate. This is a recognition that a retention schedule is a ‘living document’ and may be subject to continual minor change year on year.</p> <p>The Keeper has also been provided with evidence that the IJB has input into the</p>

			<p>retention decisions applied to its information assets.</p> <p>The Keeper agrees that North Ayrshire Integration Joint Board has ensured that all their public records are subject to suitable retention periods as required.</p>
6. Destruction Arrangements	<b>G</b>	<b>G</b>	<p>The Act requires that public records are destroyed in a timely, controlled and secure manner.</p> <p>The <i>Plan</i> states that “Destruction of Board records, in all formats, will be undertaken in line with North Ayrshire Council policies and procedures.”</p> <p>As all the public records of the IJB are managed on the systems of North Ayrshire Council, the adoption of the Council’s destruction procedures is practical.</p> <p>This arrangement has been agreed by North Ayrshire Council. A <i>Covering Letter</i> from the Chief Executive of the Council, addressed to the Keeper, confirms: “The destruction process for North Ayrshire Integration Joint Board records will be undertaken in line with North Ayrshire Council’s procedures and practices.”</p> <p>In July 2015, the Keeper agreed that the destruction processes in North Ayrshire Council were strong. He also was provided with staff guidance on record destruction which he accepts will apply to the records of the IJB.</p> <p>The Keeper agrees that North Ayrshire Integration Joint Board have adequate processes in place to ensure the secure, controlled and irretrievable of their public records when appropriate.</p>
7. Archiving and Transfer	<b>A</b>	<b>G</b>	<p>The Act requires that all Scottish public authorities identify a suitable repository for the permanent preservation of any records considered suitable for archiving. A</p>

			<p>formal arrangement for transfer to that repository must be in place.</p> <p>The IJB relies on the archiving policies of the Council. This is reasonable as any public record of the IJB identified for permanent preservation will be held on Council systems.</p> <p>North Ayrshire Council, in conjunction with East Ayrshire and South Ayrshire Councils, operates 'Ayrshire Archives'. North Ayrshire Council deposits records selected for permanent preservation in Ayrshire Archives.</p> <p><b>However, as stipulated at Element 4, the IJB create digital records only and therefore are not currently covered by the archiving agreement and service provided by Ayrshire Archives under the North Ayrshire Council Archiving and Transfer Policy which covers paper records only. The IJB have stated: "The Integration Joint Board acknowledge the importance of digital preservation and take this on board for future consideration and will seek to investigate the development of a Digital Archiving Policy in conjunction with North Ayrshire Council."</b></p> <p>The Keeper agrees that digital archiving in the Scottish public sector is in its infancy. However, until the IJB features in a formal archiving agreement with Ayrshire Archives this element of the Records Management Plan remains temporarily incomplete. He appreciates, however, that this is not an improvement that the IJB can make on its own and that developments on the part of Ayrshire Archives will be needed.</p> <p><b>The Keeper, therefore, is happy to agree this element of the North Ayrshire Integration Joint Board's Records Management Plan under 'improvement model' terms. This means that the authority has identified a gap in provision (no formal archiving agreement in place) and have suggested reasonable</b></p>
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			<b>actions to close that gap (investigate a digital archiving policy in conjunction with the Council). The Keeper’s agreement is conditional on his being updated on the situation when requested.</b>
8. Information Security	<b>G</b>	<b>G</b>	<p>The Act requires that public records are held in accordance with information security compliance requirements.</p> <p>The <i>Plan</i> states that “All systems, devices, information sharing platforms, etc. that the IJB relies upon are owned and maintained by North Ayrshire Council.” (<i>Plan</i> page 10). It makes practical sense, therefore, that the IJB relies on the information security processes of North Ayrshire Council including those relating to staff access and training. All staff managing IJB records are Council employees.</p> <p>The application of the Council’s information security procedures to IJB records is an arrangement that is supported by a <i>Covering Letter</i> from the Chief Executive of the Council: “All North Ayrshire Integration Joint Board records are held within North Ayrshire Council’s networks and are therefore subject to policies and procedures and evidenced under Element 8 of North Ayrshire Council’s Records Management Plan and subsequent Progress Update Review.”</p> <p>In both the Council’s original submission (2015) and in the Progress Update Review (PUR) referenced by the Chief Executive (2018) the Keeper agreed that robust procedures are in place to ensure that the information and systems used by the Council are protected by appropriate policies and procedures as required by the Act.</p>
9. Data Protection	<b>G</b>	<b>G</b>	<p>The Keeper expects a Scottish public authority to manage records involving personal data in compliance with data protection law.</p> <p>The IJB states: ““North Ayrshire Integration Joint Board relies wholly upon the technical and organisational measures of North Ayrshire Council as a data controller</p>

			<p>as all records are held on the Council’s systems. No personal data as defined by the Data Protection Act 2018 is processed by the Integration Joint Board as a legal entity and therefore would not be defined as a data controller in its own right.”</p> <p>North Ayrshire Integration Joint Board is therefore not currently listed as a data controller with the Information Commissioner.</p> <p>The public records of the IJB are managed by North Ayrshire Council. The Keeper accepts that, currently, this authority is acting as data controller for IJB records.</p> <p>Staff working on IJB records will personally be subject to the data protection regime of their employing organisation.</p> <p>The data protection provision in North Ayrshire Council is explained at:  <a href="http://north-ayrshire.gov.uk">Data Protection (north-ayrshire.gov.uk)</a></p> <p>The Keeper agrees that North Ayrshire Integration Joint Board have appropriate arrangements in place to comply with current data protection legislation.</p>
<p>10. Business Continuity and Vital Records</p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>The Keeper expects that record recovery, prioritising vital records, is an integral part of the authority’s business continuity planning.</p> <p>All the public records of the IJB are managed on the record keeping systems of North Ayrshire Council. They are therefore subject to the record recovery arrangements of the Council. This is accepted in a <i>Covering Letter</i> from the Chief Officer of the IJB and agreed in a <i>Covering Letter</i> from the Chief Executive of the Council.</p> <p>The Keeper agreed this element of the North Ayrshire Council records management plan on ‘improvement model’ terms awaiting the approval of a sample <i>Business</i></p>

			<p><i>Continuity Plan</i> that had been provided with the submission. However, the Keeper acknowledges that in 2018 this updated evidence was provided.</p> <p>Therefore, the Keeper can agree that the public records of North Ayrshire Integration Joint Board are covered by an operational <i>Business Continuity Policy</i> and that information management and records recovery properly feature in North Ayrshire Council's plans.</p>
11. Audit trail	<b>G</b>	<b>G</b>	<p>The Keeper expects an authority to have process in place to track public records in such a way that their location is known and changes recorded.</p> <p>All the public records of North Ayrshire Integration Joint Board are held on the record keeping systems of North Ayrshire Council.</p> <p>The arrangement is confirmed by a <i>Covering Letter</i> from the Chief Executive of the Council which states "North Ayrshire Integration Joint Board records are subject to North Ayrshire Council's File Naming Convention and Document Control Guidelines."</p> <p>This is also supported by a <i>Covering Letter</i> from the Chief Officer of the IJB which states "NAIJB records will be managed in accordance with North Ayrshire Council policies and procedures".</p> <p>The Keeper agrees that, as all the records are held on the Council's systems, document tracking and identification must be facilitated utilising the practices of the Council.</p> <p>In July 2015 the Keeper agreed that the Council has procedures in place to ensure that the correct version of a record can be located.</p>

			<p>Therefore the Keeper can agree that North Ayrshire Integration Joint Board has procedures in place that will allow them to locate their records and assure themselves that the located record is the correct version.</p>
<p>12. Competency Framework for records management staff</p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>The Keeper expects staff creating, or otherwise processing records, to be appropriately trained and supported.</p> <p>In both the <i>Plan</i> (page 14) and in a <i>Covering Letter</i> from the Chief Executive of North Ayrshire Council (Ms. Lewis' employer) a commitment is made that "training is scheduled to ensure her continued development".</p> <p>The <i>Plan</i> also explains that, as part of the GDPR rollout, all Council staff undertook a 'comprehensive training programme'.</p> <p>There is no further detail on the contents of this course although the training is confirmed in general terms by statements in the Council's 2017 Progress Update Review (PUR) (submitted June 2018). However, again details of what this involved were absent.</p> <p>The IJB has now supplied the Keeper with details of Information Management training and GDPR training. He thanks them for this update and therefore:</p> <p>The Keeper agrees that North Ayrshire Integration Joint Board has ensured that the individual identified at element 2 has access to appropriate training and development opportunities and furthermore that the IJB can be confident that all staff with access to their public records are suitably proficient in the records management aspects that are relevant to their role.</p>



<p>13. Assessment and Review</p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>Section 1(5)(i)(a) of the Act says that an authority must keep its RMP under review.</p> <p>As all the public records of the IJB are managed on the systems of North Ayrshire Council, the adoption of the Council’s review procedures is practical.</p> <p>The <i>Covering Letter</i> confirms that this arrangement is in place: “North Ayrshire Integration Joint Board records will be assessed and reviewed in line with North Ayrshire Council’s information governance policies and procedures.”</p> <p>The Keeper has already agreed that the review procedures operational in North Ayrshire Council are appropriate.</p> <p>The IJB have explained that the results of the Council’s Annual Progress Update Review will be reported separately to them.</p> <p>The Plan notes that “NAIJB will participate in the annual Progress Update Review that is recommended by the National Records Scotland to ensure records management practices are regularly reviewed, and where necessary, require to be updated.” This commitment is welcomed by the Keeper and shows good evidence that the authority intends to keep its RMP under review as required by the Act.</p> <p>The Keeper agrees that North Ayrshire Integration Joint Board has processes in place to ensure that their records management plan is kept under review as required by the Act.</p>
<p>14. Shared Information</p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>The Keeper expects a Scottish public authority to ensure that information sharing, both within the Authority and with other bodies or individuals, is necessary, lawful and controlled.</p>

			<p>As part of its function an IJB must utilise the records of other partners and, therefore, information sharing is a key part of its business. In the case of North Ayrshire Integration Joint Board the record of the Board itself are managed by a third party (the Council). For these reasons the Keeper must be satisfied that robust data sharing agreements are in place in that third party.</p> <p>The Keeper has already agreed that the information sharing provision in the Council is appropriate (July 2015).</p> <p>Statements in the <i>Plan, Covering Letter</i> and evidence supplied make it clear that the IJB has robust policies and procedures for info sharing, including Information Sharing agreements. A sample agreement (IJB and Common Service Agency) has been provided in evidence as has the standard agreement between the three Ayrshire Councils and the three IJBs.</p> <p>The Keeper agrees that North Ayrshire Integration Joint Board appropriately considers information governance when planning data sharing with third parties.</p>
<p>15. Public records created or held by third parties</p>	<p><b>N/A</b></p>	<p><b>N/A</b></p>	<p><b><u>Third Parties:</u></b></p> <p>The Public Records (Scotland) Act 2011 (PRSA) makes it clear that records created by third parties when carrying out the functions of a scheduled authority should be considered ‘public records’ - PRSA Part 1 3 (1)(b).</p> <p>The <i>Plan</i> is arranged according to the, 14 element, version of the Keeper’s Model Plan which was operational at the time of the original submission (February 2019). In May 2019 the Keeper introduced a 15<sup>th</sup> “Third Party Contractors” element:  <a href="https://www.nrscotland.gov.uk/record-keeping/public-records-scotland-act-2011/resources/model-records-management-plan">https://www.nrscotland.gov.uk/record-keeping/public-records-scotland-act-2011/resources/model-records-management-plan</a></p>

			<p>However, it should be noted that the requirement to address the issue of third-party contractors carrying out functions of an authority has always been integral to the Act.</p> <p>The IJB have clearly stated that “No third-parties are contracted to carry out any functions of the North Ayrshire Integration Joint Board.”</p> <p>This element does not apply.</p>
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**North Ayrshire Integration Joint Board  
(‘The IJB’ in the assessment below)**

**Explanation: All public records of the North Ayrshire Integration Joint Board are held on North Ayrshire Council systems and, as this is the case, the IJB must adopt the records management provision of the Council. This is made clear in the *Records Management Plan* (for example page 6) and in a *Covering Letter* from the Chief Executive of North Ayrshire Council.**

**“It has been identified whilst engaging with the Records Management Plan process that currently all North Ayrshire Integration Joint Board records are held within North Ayrshire Council’s systems and offices.” (*Covering Letter from North Ayrshire Council CEO* – see under General Comments below).**

**The Keeper agreed the *Records Management Plan* of North Ayrshire Council in July 2015:**

<https://www.nrscotland.gov.uk/files//record-keeping/public-records-act/keepers-assessment-report-north-ayrshire.pdf>

**In 2017 North Ayrshire Council provided the Keeper with an update on their RMP:**

<https://www.nrscotland.gov.uk/files//record-keeping/public-records-act/pur-final-report-for-north-ayrshire-council-and-licensing-board.pdf>

**General Notes on submission:** This assessment is on the *Records Management Plan* (the *Plan*) of North Ayrshire Integration Joint Board as submitted to the Keeper of the Records of Scotland for his agreement on 25<sup>th</sup> February 2019.

The submission to the Keeper included the *Plan* a *Covering Letter* from Craig Hatton, Chief Executive of North Ayrshire Council and a separate letter from Stephen Brown, Director Health & Social Care Partnership and Chief Officer of the IJB. These letters support 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.

## 6. Keeper's Summary

Elements 1 - 15 that the Keeper considers should be in a public authority records management plan have been properly considered by North Ayrshire Integration Joint Board. Policies and governance structures are in place to implement the actions required by the plan.

Elements that require development by North Ayrshire Integration Joint Board are as follows

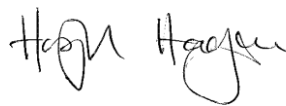
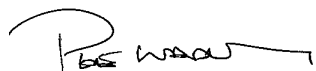
### Element 07: Archive arrangements

## 7. Keeper's Determination

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

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



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