

Public Records (Scotland) Act 2011

Perth & Kinross Integration Joint Board

The Keeper of the Records of Scotland

21st July 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 Perth & Kinross Integration Joint Board by the Public Records (Scotland) Act 2011 Assessment Team following its submission to the Keeper on 30th September 2020.

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

3. Authority Background

An order to establish the Perth and Kinross Integration Joint Board (IJB) was laid before the Scottish Parliament on 4 September 2015 and was passed on 3 October 2015. The first meeting of the Perth & Kinross Integration Joint Board was held on 6 November 2015.

<https://www.pkc.gov.uk/ijb> (includes video of IJB meetings)

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 Perth & Kinross 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

Perth and Kinross Integration Joint Board (‘The IJB’ in the assessment below)

Explanation: All public records of the Perth and Kinross Integration Joint Board are held on Perth and Kinross 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 Officer of the IJB.

“...records are managed in accordance with the records and information management policy and procedure of Perth & Kinross Council.” (*Covering Letter from IJB CEO* – see under General Comments below).

The Plan is also accompanied by a separate *Covering Letter* from the Head of Legal Services in the Council which confirms “it has been agreed between the IJB and Perth & Kinross Council that IJB records created by Perth & Kinross Council will be managed in accordance with Perth & Kinross Council’s records management plan, policies, and procedures.”

The Keeper agreed the *Records Management Plan* of Perth and Kinross Council in July 2015:

<https://www.nrscotland.gov.uk/files//record-keeping/public-records-act/keepers-assessment-report-perth-and-kinross-council-and-licensing-board.pdf>

Element	Present	Evidence	Notes
1. Senior Officer	G	G	<p>Perth and Kinross Integration Joint Board have identified Gordon Paterson, 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.</p> <p>The Chief Officer is the Corporate Owner of the <i>Plan</i>.</p> <p>The Keeper agrees that Perth and Kinross 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	G	G	<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>Perth and Kinross Integration Joint Board have identified Donald Henderson, Information Governance Manager (P&K 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 letter from the Head of Legal Services of the Council, addressed to the Chief Officer.</p> <p>All the public records of the IJB are stored and managed on Perth and Kinross Council systems (see explanation above and element 4 below). Mr Henderson is the</p>

			<p>Council's Information Governance Manager and as such has full access to the IJB's public records. In 2015 the Keeper agreed that the Council had identified a suitable individual to take on this role (this was a previous post-holder at a subordinate grade).</p> <p>The Keeper has been provided with a copy of the <i>Information Governance Manager Job Profile</i> which clearly shows that Mr Henderson has the appropriate seniority and expertise to undertake this role. His responsibilities include to:</p> <p>“Act as the designated Records Manager for the Council with responsibility for setting and monitoring standards and the promotion of best practice in records management. Maintain, monitor, review and report on the Council's Records Management Plan. Develop and maintain the Council's record retention schedules in consultation with Services (see element 5). Develop and maintain the Council's file plan in consultation with Services and in keeping with national standards (see element 4). Liaise with and where appropriate advise Culture Perth & Kinross in relation to the Council's archive function (see element 7).”</p> <p>The Keeper agrees that the Council's Information Governance Manager is an appropriate individual to be identified to this role.</p>
3. Policy	G	G	<p>The Act requires an authority to have an appropriate policy statement on records management.</p> <p>The <i>Plan</i> states that “For the purposes of record management, the IJB has adopted and is fully committed to the records management policies of Perth & Kinross Council.”</p> <p>As all the public records of the IJB are managed on the systems of Perth and Kinross Council, the adoption of the Council's <i>Records Management Policy</i> is</p>

			<p>entirely suitable.</p> <p>This arrangement has been agreed by Perth and Kinross Council. A letter from the Head of Legal Services of the Council, addressed to the Chief Officer, confirms: “it has been agreed between the IJB and Perth & Kinross Council that IJB records created by Perth & Kinross Council will be managed in accordance with Perth & Kinross Council’s records management plan, policies, and procedures.”</p> <p>The letter from the Head of Legal Services also confirms that "Perth & Kinross Council will ensure that all officers of the IJB have access to its records management plan and related policies and procedures."</p> <p>In July 2015, the Keeper agreed that the <i>Records Management Policy</i> of Perth and Kinross 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. 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 Perth and Kinross 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>A</p>	<p>G</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 “Perth & Kinross IJB will follow the corporate Business Classification Scheme (BCS) adopted by Perth & Kinross Council. Perth & Kinross Council are currently implementing an Electronic Document Management System (EDMS)” (<i>Plan</i> page 7).</p>

			<p>There are statements in the <i>Plan</i> that confirm that all public records of the IJB are digital (for example page 9).</p> <p>This arrangement is confirmed by a letter from the Head of Legal Services at the Council, which has been provided to the Keeper and which states “IJB records created by Perth & Kinross Council will be managed in accordance with Perth & Kinross Council’s records management plan, policies, and procedures. Perth & Kinross Council’s records management plan was approved by the Keeper of the Records of Scotland in July 2015 and covers all aspects of records management including:</p> <ul style="list-style-type: none"> • Classification of business records including health records • Schedules for retention and disposal of records.” <p>The Keeper has been provided with a screen-shot as evidence that IJB records are part of the Council’s records structure as stated.</p> <p>The Keeper agreed this element of Perth and Kinross Council’s <i>Records Management Plan</i> in July 2015. However, he did so under ‘improvement model’ terms. This means that he acknowledges that the authority has recognised a gap in provision (they were undergoing a transition to a eDRM solution). He agreed that the authority had instigated processes to close that gap. The Keeper’s agreement was conditional on him being updated as this project progresses (see element 4). The Council has yet to provide an update, so their plan remains at ‘amber’.</p> <p>As evidenced by the quote above, the IJB recognises that elements of their partner’s records management plan are yet to be fully compliant.</p> <p>The Keeper can agree this element of the Integration Joint Board’s <i>Records Management Plan</i> under the same amber ‘improvement model’ terms as its</p>
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			'host' authority.
5. Retention schedule	A	G	<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 Perth and Kinross 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>The <i>Plan</i> (page 8) confirms that: "The IJB records manager was involved in agreeing the retention schedules for the IJB records, and is satisfied that they are appropriate. There are no plans to have separate retention schedules for IJB records at present, but we are aware that should this be required, it will be the IJB's responsibility to ensure these arrangements are put in place." The Keeper agrees that the IJB can be confident that the retention decisions allocated to their information assets are suitable for their business needs.</p> <p>In July 2015, the Keeper agreed this element of Perth and Kinross Council's plan. However, he did so under 'improvement model' terms. This was in recognition of a major change in the record keeping systems at the Council (see element 4 above).</p> <p>The Keeper can agree this element of the Perth & Kinross Integration Joint Board <i>Records Management Plan</i> under the same 'improvement model' terms as its 'host' authority.</p>
6. Destruction	A	G	The Act requires that public records are destroyed in a timely, controlled and secure

<p>Arrangements</p>			<p>manner.</p> <p>The <i>Plan</i> explains that all public records of the IJB are held on Perth and Kinross Council systems and are subject to the destruction processes of the Council. The Keeper agrees that the adoption of the Council’s destruction procedures is practical.</p> <p>This arrangement has been agreed by Perth and Kinross Council as evidenced by a letter from the Head of Legal Services at the Council, which has been provided to the Keeper.</p> <p>In July 2015, The Keeper agreed this element of Perth and Kinross Council’s plan. However, he did so under ‘improvement model’ terms. This was in recognition of a major change in the record keeping systems at the Council (see element 4 above).</p> <p>The Keeper therefore agrees this element of the IJB <i>Plan</i> under the same improvement model terms as the ‘host’ authority.</p>
<p>7. Archiving and Transfer</p>	<p>A</p>	<p>G</p>	<p>The Act requires that all Scottish public authorities identify a suitable repository for the permanent preservation of any records considered suitable for archiving. A formal arrangement for transfer to that repository must be in place.</p> <p>The <i>Plan</i> states (page 10): “The records for the IJB will be subject to the archiving procedures within Perth & Kinross Council. The archive for P&K Council is managed by Culture PK at AK Bell Library.”</p> <p>The Keeper agrees that the archive repository at Culture PK is appropriate for the deposit of those public records of the IJB selected for permanent historical preservation.</p>

			<p>However at the time of the Keeper’s agreement of the Council <i>Plan</i>, in 2015, it was noted that “One of the action points included in the RMP is to develop a Service Level Agreement (SLA) and associated guidance by the end of March 2016. Training will also be developed by the end of 2016 and rolled-out across the Council. Longer-term work will also be undertaken to quantify the amount of physical storage required to meet the Council’s needs and to devise an e-archive solution (both by end of 2019). The action points will help to standardise practice across the Council.” There has been no update from the Council since the original submission so this element of their plan remains at amber.</p> <p>The Keeper requires that, when the SLA mentioned above is being created (or updated) the records of the IJB are specifically mentioned. Furthermore he requires that IJB staff have an input into the archive selection process.</p> <p>For the moment, awaiting confirmation of a SLA including and involving the IJB, the Keeper can agree this element of the IJB <i>Plan</i> under the same improvement model terms as the ‘host’ authority. This agreement is conditional on his being updated <u>within the next year</u> of progress in this matter.</p>
8. Information Security	G	G	<p>The Act requires that public records are held in accordance with information security compliance requirements.</p> <p>The Covering Letter from the IJB Chief Officer confirms that the authority “is fully committed to creating, managing, disclosing, <u>protecting</u> and disposing of information effectively and legally.”</p> <p>All public records of the IJB are held on the records management systems of Perth</p>

			<p>& Kinross Council. It makes practical sense, therefore, that the IJB relies on the information security processes of the Council including those relating to staff access and training. All staff managing IJB records are Council employees.</p> <p>The <i>Plan</i> states that “All staff within the IJB have access to training regarding Information Security, including the Chief Officer and Chief Finance Officer.” (<i>Plan</i> page 11).</p> <p>The IJB has provided the Keeper with a copy of the Council Information Security Policy (2016).</p> <p>The Plan notes that any members of staff of NHS Tayside that are given access to IJB records will also be bound by their personal responsibilities under the information security policies (and disciplinary procedures) of their employer. This is agreed.</p> <p>In the Council’s original submission (2015) 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>
<p>9. Data Protection</p>	<p>G</p>	<p>G</p>	<p>The Keeper expects a Scottish public authority to manage records involving personal data in compliance with data protection law.</p> <p>The IJB is registered as a data controller with the Information Commissioner (Registration number ZA477188)</p> <p>The IJB has appointed a Data Protection Officer, Information Governance Manager (P&K Council) (see element 2).</p> <p>The IJB has adopted the <i>Data Protection Policy</i> of the Council on whose systems</p>

			<p>the IJB records are managed. A copy of this <i>Policy</i> has been provided to the Keeper by the IJB (Version November 2018).</p> <p>The IJB Plan is supported by a letter from the Head of Legal Services at the Council which states: “it has been agreed between the IJB and Perth & Kinross Council that IJB records created by Perth & Kinross Council will be managed in accordance with Perth & Kinross Council’s records management plan, policies, and procedures. Arrangements for ensuring compliance with data protection legislation”.</p> <p>In July 2015 the Keeper agreed that the data protection provision in Perth and Kinross Council was appropriate to their business. Although, the 2018 legislation post-dates the Keeper’s agreement, the Council’s website has been updated to reflect these changes: https://www.pkc.gov.uk/dataprotection</p> <p>The IJB has provided the Keeper with a copy of the Council Data Protection Policy (2018).</p> <p>Therefore, the Keeper is satisfied that, by adopting the Council’s provision, the IJB has ensured that its records are managed in such a way to comply with data protection current law.</p>
<p>10. Business Continuity and Vital Records</p>	<p>G</p>	<p>G</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 Perth and Kinross IJB are held on the record keeping systems of Perth and Kinross Council. This is confirmed by a Covering Letter from the IJB Chief Officer and a separate letter from the Head of Legal Services at the Council. All the public records of the IJB are held digitally.</p> <p>It is practical therefore for the IJB to point to the record recovery systems in operation at the Council for this element.</p>

			<p>In July 2015, the Keeper agreed that the business continuity/record recovery procedures in the Council were suitable and properly included record recovery.</p> <p>The Keeper agrees that Perth and Kinross IJB have ensured that their public records can be recovered in case of an emergency.</p>
11. Audit trail	A	G	<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>The public records of Perth and Kinross IJB are held digitally on the records management systems of Perth and Kinross Council. It is practical therefore that the record tracking processes in the Council are adopted by the IJB.</p> <p>Perth and Kinross Council were undergoing a transformation of their record management solution at the time of the submission of their records management plan (December 2014). The Keeper’s agreement of that plan was to a greater extent under improvement model terms. This included element 11 as the system used to store the Council’s public records clearly affected the record tracking functionality (see element 4 for more).</p> <p>The Keeper therefore agrees this element of the Perth and Kinross IJB Plan under the same improvement model terms.</p>
12. Competency Framework for records management staff	G	G	<p>The Keeper expects staff creating, or otherwise processing records, to be appropriately trained and supported.</p> <p>The IJB has provided the job description of the individual identified at element 2, which clearly shows that he has responsibility for records management in the authority. The Job Description lists the ‘knowledge and experience’ required to</p>

			<p>undertake the role which the Keeper agrees is appropriate. He also has a responsibility to “Develop and deliver training on aspects of information governance to Elected Members and Council employees at all levels”.</p> <p>Mr Henderson is an accredited member of the Information records Management Society.</p> <p>The <i>Covering Letter</i> from the Chief Officer of the IJB that accompanied the <i>Plan</i> states that “Perth & Kinross Council also have policies in place and training available to staff with regards to Records Management (including Data Protection & Information Security).”</p> <p>A letter from the Head of Legal Services at Perth and Kinross Council, shared with the Keeper, confirms that “Perth & Kinross Council will be responsible for ensuring the records manager receive appropriate training and support to carry out their functions in respect of IJB records created and managed by Perth & Kinross Council.”</p> <p>In 2015 the Keeper agreed that the staff training arrangements in Perth and Kinross Council were appropriate and, as all IJB staff creating and otherwise managing public records are Council employees, he can agree this element on that basis.</p> <p>The Keeper agrees that Perth and Kinross 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>
13. Assessment	A	G	Section 1(5)(i)(a) of the Act says that an authority must keep its RMP under review.

and Review			<p>The <i>Plan</i> states (page 16): “The Board will rely on the partner authority to ensure that the systems, policies and procedures that govern its records are being regularly assessed. The Board’s plan must, therefore, refer to the partner bodies [sic] arrangements under this element.”</p> <p>The Keeper agrees that, as all the public records of the IJB are managed on the systems of Perth and Kinross Council, the adoption of the Council’s review procedures is practical.</p> <p>The RMP (page 16) states: “P&K Council are undertaking a review of their Records Management Plan, and the outcome of this review when complete will be communicated by the P&K Council Records Manager to the owners of this IJB RMP.”</p> <p>The Keeper agreed this element of the <i>Perth and Kinross Council Records Management Plan</i> under improvement model terms awaiting the development of a review process and a report format which was planned to be introduced in 2016. The Council has not updated the Keeper on this issue so their plan remains at amber.</p> <p>The Keeper can agree this element of the Perth and Kinross IJB plan under the same improvement model terms as the Council.</p>
14. Shared Information	G	G	<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 Perth and Kinross Integration Joint Board the record of the Board itself are managed by a third</p>

			<p>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 between Perth & Kinross Health & Social Care Partnership, Perth & Kinross Council and Tayside Health Board has been provided in evidence.</p> <p>The Keeper agrees that Perth and Kinross 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>N/A</p>	<p>N/A</p>	<p><u>Third Parties:</u></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. In May 2019 the Keeper introduced a 15th "Third Party Contractors" element: https://www.nrscotland.gov.uk/record-keeping/public-records-scotland-act-2011/resources/model-records-management-plan</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 RMP clearly states (page 18) “P&K IJB do not contract any of its statutory functions to a third-party, and therefore there are no records created by third parties carrying out the functions of a scheduled authority.”</p>
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Assessment Sheet

Perth and Kinross Integration Joint Board
 ('The IJB' in the assessment below)

Explanation: All public records of the Perth and Kinross Integration Joint Board are held on Perth and Kinross 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 Officer of the IJB.

“records are managed in accordance with the records and information management policy and procedure of Perth & Kinross Council.” (*Covering Letter from IJB CEO – see under General Comments below*).

The Plan is also accompanied by a separate *Covering Letter* from the Head of Legal Services in the Council which confirms “it has been agreed between the IJB and Perth & Kinross Council that IJB records created by Perth & Kinross Council will be managed in accordance with Perth & Kinross Council’s records management plan, policies, and procedures.”

The Keeper agreed the *Records Management Plan* of Perth and Kinross Council in July 2015:

<https://www.nrscotland.gov.uk/files//record-keeping/public-records-act/keepers-assessment-report-perth-and-kinross-council-and-licensing-board.pdf>

General Notes on submission: This assessment is on the *Records Management Plan* (the *Plan*) v2.0 of Perth and Kinross Integration Joint Board as submitted to the Keeper of the Records of Scotland for his agreement on 30th September 2020. This was superseded by v2.1 effective from 3rd June 2021.

The submission to the Keeper included the *Plan* a *Covering Letter* from Gordon Patterson, Chief Officer of Perth and Kinross Integration Joint Board and a separate letter from Lisa Simpson, Head of Legal Services and Perth and Kinross Council. 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 Perth & Kinross Integration Joint Board. Policies and governance structures are in place to implement the actions required by the plan.

Elements that require development by **Perth & Kinross Integration Joint Board** are as follows

Element 07 Archiving and Transfer: Ensuring IJB records are included in archive transfer arrangements

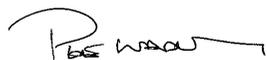
Elements 04 Business Classification, 05 Retention Schedule, 06 Destruction Arrangements, 11 Audit Trail and 13 Assessment and Review all require improvement action on the part of the authority on whose systems the IJB's public records are managed.

7. Keeper's Determination

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

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



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Paul Lowe
Keeper of the Records of Scotland