

Public Records (Scotland) Act 2011

South Lanarkshire Integration Joint Board

The Keeper of the Records of Scotland

28th April 2022

Contents

1. Public Records (Scotland) Act 2011	3
2. Executive Summary	4
3. Authority Background	4
4. Assessment Process	5
5. Model Plan Elements: Checklist	6
6. Keeper's Summary	23
7. Keeper's Determination	24
8. Keeper's Endorsement	25

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 South Lanarkshire Integration Joint Board by the Public Records (Scotland) Act 2011 Assessment Team following its submission to the Keeper on 4th December 2021.

The assessment considered whether the RMP of South Lanarkshire Integration Joint Board was developed with proper regard to the 15 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 South Lanarkshire Integration Joint Board complies with the Act can be found under section 7 of this report with relevant recommendations.

3. Authority Background

The integration of health and social care is part of the Scottish Government's programme of reform to improve care and support for those who use health and social care services.

The Public Bodies (Joint Working) (Scotland) Act provides the legislative framework for the integration of health and social care services in Scotland.

From the 1st of April 2016 the South Lanarkshire Integration Joint Board took responsibility for planning, commissioning and overseeing the delivery of a wide range of health and social care functions.

These functions are delivered in an integrated way, primarily by South Lanarkshire Council and NHS Lanarkshire – known collectively as 'South Lanarkshire Health and Social Care Partnership'. Unpaid carers, the voluntary sector and the independent sector are also partners. The Social Care Partnership is directed by the Integration Joint Board. This Board operates as a body corporate (a separate legal entity), acting independently of NHS Lanarkshire and South Lanarkshire Council.

For the purposes of the Public Records (Scotland) Act, the Integration Joint Board is the scheduled authority rather than the Partnership.

[slhscp South Lanarkshire Council](#)

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 South Lanarkshire 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

South Lanarkshire Integration Joint Board (‘The IJB’ in the assessment below)

Explanation: All public records of the South Lanarkshire Integration Joint Board are held on South Lanarkshire 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 4 – “The IJB recognises and acknowledges that its records are held on SLC systems and the IJBs RMP therefore reflects South Lanarkshire Council’s RMP”).

**The Keeper agreed the *Records Management Plan (RMP)* of South Lanarkshire Council in June 2017:
[Keepers Assessment Report - South Lanarkshire Council and Licensing Board \(nrscotland.gov.uk\)](#)**

Element	Present	Evidence	Notes
1. Senior Officer	G	G	The Public Records (Scotland) Act 2011 (the Act) requires that an individual senior staff member is identified as holding corporate responsibility for records management in a public authority.

			<p>South Lanarkshire Integration Joint Board (the IJB) have identified Soumen Sengupta, Director of South Lanarkshire Health & Social Care Partnership / Chief Officer of South Lanarkshire Integration Joint Board, as the individual with overall responsibility for records management in the authority.</p> <p>This identification is supported by a <i>Covering Letter</i> from Mr Sengupta which has been provided to the Keeper (December 2021).</p> <p>The <i>RMP</i> states (page 5): “As recognition of the importance of the senior management role in promoting good records management practice, the Chief Officer fully endorses the Plan and takes senior responsibility for implementation of the records management procedures detailed in the RMP” The Keeper welcomes this statement.</p> <p>The Keeper agrees that South Lanarkshire Integration Joint Board have identified an appropriate individual to this role as required by the Public Records (Scotland) Act 2011 (the Act).</p>
<p>2. Records Manager</p>	<p>G</p>	<p>G</p>	<p>The Act requires that each authority identifies an individual staff member as holding operational responsibility for records management and that that staff member has appropriate corporate responsibility, access to resources and skills. The Keeper has agreed that, due to the partnership nature of an integration joint board, two individuals may be identified under this element.</p> <p>South Lanarkshire Integration Joint Board have identified Martin Kane, Service Manager, South Lanarkshire Health and Social Care Partnership, as the individual that has day-to-day responsibility for implementing the <i>RMP</i> in the authority.</p> <p>This identification is supported by a <i>Covering Letter</i> from the IJB Chief Officer (see element 1) which names Mr Kane specifically.</p>

			<p>It is also supported by recommendations made to the Board in December 2018 and published at South Lanarkshire Integration Joint Board Meeting Tuesday 4 December 2018 Agenda pack and Notice .pdf (see Agenda Item 6 of this document).</p> <p>The <i>RMP</i> states (page 5): “The Chief Officer acknowledges all Board records are held on Council systems and will ensure, when required, improvements to records management procedures are implemented corporately and monitored by the Council’s Records and Data Officer through the assessment and review process.” This is entirely appropriate when the public records of the IJB are held on South Lanarkshire Council systems. However, the public records of the IJB remain <u>their</u> information assets and regular liaison between the IJB Service Manager and the Council’s Records and Data Officer will be required.</p> <p>The Keeper has been provided with an Email from Geraldine McCann, Head of Legal Services at South Lanarkshire Council confirming these arrangements and specifically that the IJB will be able to seek advice and support from the Council in the event that there are any changes or training requirements with regards to Record Management (see element 12); that the IJB follows the Council’s records and data policies and procedures, including the Records Management Policy (see element 3).</p> <p>The Keeper agrees that South Lanarkshire Integration Joint Board have identified a suitable individual, offered appropriate support, to fulfil the day-to-day records management role as required by the Act.</p>
3. Policy	G	G	The Act requires an authority to have an appropriate policy statement on records management.

			<p>All the public records of the IJB are held digitally on the record keeping systems of South Lanarkshire Council. As this is the case, they are managed under the <i>Records Management Policy</i> of the Council. This is acknowledged in the <i>RMP</i>: “The IJB’s records are held on SLC systems. On this basis, the IJB follows SLC records and data policies and procedures, including adopting SLC Records Management Policy.” (<i>RMP</i> page 7).</p> <p>The South Lanarkshire Council <i>Records Management Policy</i> is available at: https://www.southlanarkshire.gov.uk/directory_record/10579/records_management_policy</p> <p>The <i>Records Management Policy</i> and a suite of other South Lanarkshire Council information governance policies and guidance documents have been provided to the Keeper as part of the IJB’s <i>RMP</i> submission.</p> <p>All staff of the IJB are also staff of South Lanarkshire Council and have full access to Council policies, procedures and training.</p> <p>In June 2017, the Keeper agreed that the Records Management Policy of South Lanarkshire Council was appropriate for the management of the authority’s public records: Keepers Assessment Report - South Lanarkshire Council and Licensing Board (nrscotland.gov.uk)</p> <p>Therefore the Keeper agrees that South Lanarkshire Integration Joint Board have ensured that their public records are managed under a suitable records management policy statement as required by the Act.</p>
4. Business Classification	A	G	The Keeper expects that the public records of an authority are known and are identified within a structure.

			<p>South Lanarkshire Integration Joint Board's <i>RMP</i> (page 7) confirms that "The IJB's records are held on SLC systems. On this basis, the IJB follows SLC records and data policies and procedures."</p> <p>Records relating to the <u>output</u> of the IJB are held on the South Lanarkshire Council committee management system (CMIS) which is hosted on South Lanarkshire Council servers. They can be also viewed on the South Lanarkshire Council public facing website: slhscp South Lanarkshire Council</p> <p>The Keeper has been provided with a screen shot of CMIS.</p> <p>The records created by the activities required for the <u>administration</u> of the IJB are managed on the South Lanarkshire eDRM (Objective) and not published. A screen-shot has been provided to the Keeper showing IJB records on the Council systems, under 'Joint Bodies'.</p> <p>The Keeper can agree that the IJB follow the Business Classification procedures of South Lanarkshire Council.</p> <p>However, when the Keeper agreed this element of the South Lanarkshire Council's <i>RMP</i> he did so under 'improvement model' terms as they are were in a development stage in regard to their Business Classification Scheme.</p> <p>The Keeper has determined that the RAG status of a <i>Records Management Plan</i> of any authority, whose records are managed on the systems of a separate authority, cannot be higher than that awarded to the 'host' authority.</p> <p>Therefore, the Keeper agrees element 4 of the IJB plan on the same 'improvement model' terms as the Council.</p>
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<p>5. Retention schedule</p>	<p>A</p>	<p>G</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>The IJB's records are held on SLC systems. On this basis records retention for the IJB records is undertaken by following South Lanarkshire Council's retention schedule.</p> <p>The 'output' of the IJB are held on the South Lanarkshire Council committee management system (CMIS). The Keeper can accept that CMIS applies retention to record held on that system. He understands that the IJB papers, held on CMIS, will be retained permanently (see element 7).</p> <p>The Keeper can agree that records managed on the South Lanarkshire eDRM will have retention automatically applied at creation. Retention decisions are based on the Scottish Council on Archives Record Retention Schedule (SCARRS). The Keeper has previously endorsed SCARRS as being suitable for use by Scottish public authorities.</p> <p>The Keeper has been provided with an extract from the South Lanarkshire Council retention schedule showing board/committee administration records.</p> <p>The <i>RMP</i> makes it clear that the IJB are appropriately involved in the allocation of retention decisions to their information assets (page 9).</p> <p>The Keeper has previously agreed the retention provision in South Lanarkshire Council (June 2017). However, when he made his agreement he did so under 'improvement model' terms . This means that the authority had identified a gap in provision (the lack of a Council-wide retention schedule)</p>
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			<p>and had identified how it intended to close this gap.</p> <p>The Keeper has determined that the RAG status of a <i>Records Management Plan</i> of any authority, whose records are managed on the systems of a separate authority, cannot be higher than that awarded to the ‘host’ authority.</p> <p>Therefore, the Keeper agrees element 5 of the IJB plan on the same ‘improvement model’ terms as the Council.</p>
<p>6. Destruction Arrangements</p>	<p>A</p>	<p>G</p>	<p>The Act requires that public records are destroyed in a timely, controlled and secure manner.</p> <p>The IJB’s records are held on SLC systems.</p> <p>The <i>RMP</i> states (page 10) “The IJBs records are stored on South Lanarkshire Council systems and destructions are completed in accordance with the standards outlined in element 6 of SLC’s Records Management Plan.” The Keeper agrees this is appropriate.</p> <p>The Keeper has previously agreed the destruction procedures in South Lanarkshire Council (June 2017). However, when he made his agreement he did so under ‘improvement model’ terms. This was because the authority had identified a gap in provision around the disposition of records from line-of-business systems (such as CMIS).</p> <p>As with elements 4 and 5 above, the Keeper agrees element 6 of the South Lanarkshire IJB’s plan on the same ‘improvement model’ terms as South Lanarkshire Council.</p>

<p>7. Archiving and Transfer</p>	<p>G</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 Introduction to the <i>RMP</i> (page 3) states that it is a principle of robust records management that " Good recordkeeping practices lead to greater productivity as less time is taken to locate information. Well managed records will help the...Preservation of vital and historical records".</p> <p>The small selection of the IJB's public records that have been selected for permanent preservation will be transferred to South Lanarkshire Archives under the arrangements already operated by South Lanarkshire Council. Archives and records - South Lanarkshire Council This is confirmed in the <i>RMP</i>: "public records of enduring evidential, historical, cultural or research value will be offered to the Archivist once it is no longer required for business purposes" (<i>RMP</i> page 11).</p> <p>As with retention (see element 5), it is important that the IJB is involved in the selection of which of its information assets are permanently preserved. In this case the Keeper can accept that the use of the phrase 'will be offered...' indicates that the IJB is suitably involved in archiving decisions.</p> <p>The Keeper recognises that digital archiving in the Scottish public sector is in its infancy and it may be many years before those records selected for permanent preservation are transferred. However, it is important that arrangements are put in place as soon as possible and he encourages the IJB to pursue these arrangements.</p> <p>In 2017 the Keeper agreed that the archiving arrangements in South Lanarkshire Council were suitable for the permanent preservation of public records.</p>
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			Therefore the Keeper can agree that South Lanarkshire Integration Joint Board have arrangements in place to ensure that those records selected for permanent preservation are properly transferred to a suitable repository.
8. Information Security	G	G	<p>The Act requires that public records are held in accordance with information security compliance requirements.</p> <p>All the public records of the IJB are managed on the record keeping systems of South Lanarkshire Council. Quite properly, the information security of these records is therefore provided by the Council. This is made clear in the <i>RMP</i> (page 12): “The IJB records are stored on SLC systems therefore the IJB will rely on SLC’s arrangements in terms of systems security.”</p> <p>The Keeper has been provided with a screen shot of the South Lanarkshire Council ‘My Works’ intranet, showing staff access to information security and other information governance policies and guidance. All IJB officers are Council staff so have access to My Works.</p> <p>As all officers of the IJB are South Lanarkshire Council staff, they must all undergo mandatory information security training.</p> <p>In June 2017, the Keeper agreed that the information security provision of South Lanarkshire Council was appropriate.</p> <p>The Keeper therefore agrees that South Lanarkshire Integration Joint Board has ensured that suitable provision is in place to guarantee the protection of their public records.</p>
9. Data	G	G	As with all other Scottish public authorities South Lanarkshire Integration Joint

Protection			<p>Board are required to comply with data protection procedures imposed by the 2018 data protection legislation (GDPR and DP2018).</p> <p>However, the IJB is not separately registered with the Information Commissioner as a data controller and has delegated this to the partner organisation. This is acknowledged in the compliance statement of the <i>RMP</i> (page 13).</p> <p>The Keeper has already agreed that the data protection processes operated by South Lanarkshire Council are appropriate (June 2017). However, it should be noted that aspects of this provision will have changed following the implementation of the Data Protection Act 2018 (and GDPR). The Keeper accepts that the council (and therefore the IJB) are still compliant under this element.</p> <p>Partner compliance can be evidenced from their website: Data protection - South Lanarkshire Council</p> <p>As all officers of the IJB are South Lanarkshire Council staff, they must all undergo mandatory data protection training.</p> <p>The Keeper agrees that South Lanarkshire Integration Joint Board is aware of its obligations under the 2018 data protection legislation and has procedures in place to protect the personal information it collects and processes.</p>
10. Business Continuity and Vital Records	G	G	<p>The Keeper expects that record recovery, prioritising vital records, is an integral part of the authority's business continuity planning.</p> <p>All South Lanarkshire IJB public records are held digitally on South Lanarkshire Council systems. Therefore, all IJB records are subject to the business continuity policies and procedures of South Lanarkshire Council in relation to record recovery.</p>

			<p>This is made clear in the <i>RMP</i> (page 14): “SLC’s <i>RMP</i> outlines business continuity and contingency planning procedures in place for SLC systems. The IJB stores its records on SLC systems.”</p> <p>The Keeper notes that the <i>RMP</i> explains that public records representing the output from the IJB (see element 4), which they consider ‘vital records’ are also available on the Council’s website and could be recovered from public networks in an emergency. This facility would not apply to the administrative records of the Board.</p> <p>In 2017 the Keeper agreed that the business continuity processes explained in the South Lanarkshire Council’s <i>Records Management Plan</i> were appropriate.</p> <p>Therefore, the Keeper agrees that South Lanarkshire Integration Joint Board have ensured that their public records are subject to robust record recovery procedures.</p>
11. Audit trail	A	G	<p>The Keeper expects an authority to have processes 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 the IJB are held on the records management systems of South Lanarkshire Council:</p> <p>IJB Papers are held on CMIS, the line-of-business committee management system. The Keeper can agree that CMIS has functionality to efficiently track records.</p> <p>IJB administrative records are held on the South Lanarkshire Council eDRM. This is Objective and the Keeper is familiar with the operation of this system. He agrees that it automatically applies version control and has suitable document location functionality. In order to properly utilise this, however, it is important that users follow standardised naming conventions.</p>

			<p>South Lanarkshire IJB follow the naming conventions of South Lanarkshire Council. A copy of the latest naming convention guidance has been supplied to the Keeper. It is available to IJB staff on the Council's 'My Works' intranet. All IJB officers are Council staff so have access to My Works.</p> <p>The IJB have provided the Keeper with a screen shot showing access to the Objective audit function.</p> <p>In June 2017, the Keeper agreed this element of South Lanarkshire Council's <i>Records Management Plan</i>. However, he did so on an improvement model basis. As with elements 4, 5 and 6 above, the Keeper agrees element 11 of the South Lanarkshire IJB's plan on the same 'improvement model' terms as South Lanarkshire Council.</p>
<p>12. Competency Framework for records management staff</p>	<p>G</p>	<p>G</p>	<p>The Keeper expects staff creating, or otherwise processing records, to be appropriately trained and supported.</p> <p>The Chief Officer of the IJB has made a specific commitment regarding training for the individual identified at element 2: "As Chief Officer of South Lanarkshire Integration Joint Board I will undertake to ensure that Mr Kane has access to relevant training on an ongoing basis to fulfil his duties under element 2." (<i>Covering Letter</i>). This is welcome commitment.</p> <p>As all officers of the IJB are South Lanarkshire Council staff, they must all undergo mandatory information security and data protection training.</p> <p>The Keeper has been provided a list of the information governance training available to staff of South Lanarkshire Council (and therefore staff of the IJB), which includes Data Sharing, e-mail and online risk and 'information management and me'.</p>

			<p>South Lanarkshire Council use the Objective eDRM system for their records management. There is a requirement that all staff are trained on the correct use of that system. The Keeper has been provided with evidence of the eDRM training modules available on the staff 'My Works' intranet pages. Staff are given specific guidance on 'how to use the file plan' (see element 4) which has also been provided to the Keeper.</p> <p>In 2017 the Keeper agreed that the information governance training in South Lanarkshire Council was appropriate.</p> <p>As all staff creating and managing their public records are South Lanarkshire Council Employees, the Keeper agrees that South Lanarkshire Integration Joint Board provide relevant information governance training for staff and furthermore the Chief Officer has recognised that the individual identified at element 2 may require additional training resource.</p>
<p>13. Assessment and Review</p>	<p>G</p>	<p>G</p>	<p>Section 1(5)(i)(a) of the Act says that an authority must keep its RMP under review.</p> <p>This is acknowledged in the IJB's <i>RMP</i> (page 4).</p> <p>The <i>RMP</i> is reviewed by the Council's Records and Data Officer (<i>RMP</i> page 5) and the records management provision afforded the public records of the IJB is reviewed annually under the same review structure as that of the Council. Once complete, a report is submitted to the IJB Performance and Audit Sub-Committee before formal ratification by the Board. The Keeper has been provided with a spreadsheet showing the forward planner Performance and Audit Sub Committee meetings as evidence.</p> <p>The Keeper has previously agreed that the review processes in South Lanarkshire Council are appropriate.</p>

			<p>The Keeper has been provided with a commitment from Geraldine McCann, Head of Legal Services at South Lanarkshire Council confirming these arrangements (see element 2).</p> <p>The Keeper agrees that South Lanarkshire Integration Joint Board have processes in place to ensure the routine review of their <i>RMP</i> as required by the Act.</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, South Lanarkshire Integration Joint Board shares information with other bodies when appropriate and does so under the terms of the <i>Lanarkshire Information Sharing Partners Information Sharing for Health and Social Care Adult Services</i> document which has been shared with the Keeper.</p> <p>The Keeper agrees that this document specifically includes the IJB and appropriately considers information governance issues.</p> <p>A screen shot has been provided to the Keeper showing how staff access information sharing guidance on the intranet.</p> <p>The Keeper can agree that South Lanarkshire Integration Joint Board properly considers records governance when undertaking information sharing programmes.</p>
15. Public records created or	N/A	N/A	<p><u>Third Parties:</u></p> <p>The Public Records (Scotland) Act 2011 (PRSA) makes it clear that records created</p>

<p>held by third parties</p>			<p>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 IJB have clearly stated: "The IJB does not make direct arrangements with third parties to carry out functions on its behalf, other than SLC and NHSL. SLC and NHSL carry out functions as directed by the IJB in accordance with their respective Records Management Plans. SLC and NHSL may make arrangements with third parties to carry out functions on behalf of the IJB. They will do this in accordance with their respective Records Management Plans."</p> <p>Although, South Lanarkshire Council and NHS Lanarkshire carry out functions under the <u>direction</u> of the IJB, these functions are those of the partner bodies not of the IJB itself and are therefore covered under the records management plans of the Council and the NHS Board.</p> <p>The Keeper agrees that this element does not currently apply to the IJB.</p>
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**South Lanarkshire Integration Joint Board
(‘The IJB’ in the assessment below)**

Explanation: All public records of the South Lanarkshire Integration Joint Board are held on South Lanarkshire 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 4 – “The IJB recognises and acknowledges that its records are held on SLC systems and the IJBs RMP therefore reflects South Lanarkshire Council’s RMP”).

**The Keeper agreed the *Records Management Plan (RMP)* of South Lanarkshire Council in June 2017:
[Keepers Assessment Report - South Lanarkshire Council and Licensing Board \(nrscotland.gov.uk\)](#)**

General Notes on submission:

Version

This assessment is on the *Records Management Plan* (the *RMP*) of South Lanarkshire Integration Joint Board (the IJB). This is the version provided to the Keeper on 4th December 2021 (Version 2.0, November 2021).

The *RMP* was accompanied by a *Covering Letter* from Soumen Sengupta, Chief Officer of South Lanarkshire Integration Joint Board (see element 1) dated 3rd December 2021. The Chair of South Lanarkshire Integration Joint Board has been copied in to this letter.

The *RMP* was also accompanied by an evidence list, relevant extracts from board meetings, screen shots of IJB record on Council systems and a suite of relevant South Lanarkshire Council policy and guidance documents. The Keeper has also been provided with the current *Lanarkshire Information Sharing Partners* document between:
North Lanarkshire Council

South Lanarkshire Council
NHS Lanarkshire
The Scottish Fire and Rescue Service
North Lanarkshire Integration Joint Board
South Lanarkshire Integration Joint Board
Voluntary Action North Lanarkshire
Voluntary Action South Lanarkshire

The *RMP* states that “Information underpins the IJB’s over-arching strategic objective and helps it meet its strategic outcomes. Its information supports it to:

- Demonstrate accountability
- Provide evidence of actions and decisions
- Assist with the smooth running of business
- Help build organisational knowledge.” (*RMP* page 3)

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 South Lanarkshire Integration Joint Board. Policies and governance structures are in place to implement the actions required by the plan.

Elements that require development by South Lanarkshire Integration Joint Board are:

- 4. Business Classification
- 5. Retention schedule
- 6. Destruction Arrangements
- 11. Audit trail

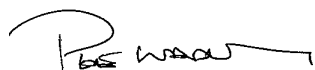
The Keeper acknowledges that these elements require improvement action on the part of the authority on whose systems the IJB's public records are managed rather than by the IJB.

7. Keeper's Determination

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

- The Keeper recommends that South Lanarkshire 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

.....
Liz Course
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 South Lanarkshire Integration Joint Board. In agreeing this RMP, the Keeper expects South Lanarkshire 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