

Public Records (Scotland) Act 2011

West Dunbartonshire Integration Joint Board

The Keeper of the Records of Scotland

8th April 2022

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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 West Dunbartonshire Integration Joint Board by the Public Records (Scotland) Act 2011 Assessment Team following its original submission to the Keeper on 28th April 2020 and resubmission in March 2022.

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

3. Authority Background

The Integration Joint Board for West Dunbartonshire is known operationally as the 'West Dunbartonshire Health & Social Care Partnership Board'.

The Health & Social Care Partnership Board is responsible for the operational oversight of West Dunbartonshire Health & Social Care Partnership (WD HSCP), which is the joint delivery vehicle for those integrated services delegated to the Integration Joint Board (the IJB) as set out within its integration scheme. West Dunbartonshire has had an integrated health and social care partnership since October 2010.

The IJB operates as a body corporate (a separate legal entity), acting independently of the Health Board and the Council. The IJB consists of six voting members appointed in equal number by the Health Board and the Council, with a number of representative members who are drawn from the third sector, independent sector, staff, carers and service users. The IJB is advised by a number of professionals including the Chief Officer, Medical Director, Nurse Director and Chief Social Work Officer

The priorities for the partnership are set out in a Strategy Plan which can be accessed from their website:

[About Us - West Dunbartonshire HSCP \(wdhscp.org.uk\)](http://wdhscp.org.uk)

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 West Dunbartonshire 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

West Dunbartonshire Integration Joint Board (‘The IJB’ in the assessment below)

Explanation: All public records of the West Dunbartonshire Integration Joint Board are held on West Dunbartonshire 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 under element 4) and in a *Memorandum of Understanding* signed by the Chief Officer of the IJB and the Chief Executive of the Council. A signed copy of the *Memorandum of Understanding* has been provided to the Keeper.

“The Parties acknowledge and agree that the responsibility for creating and maintaining the IJB’s records will be delegated to the Council. The IJB will follow the corporate Business Classification Scheme (BCS) adopted by the Council and the Council’s BCS has been updated to include IJB records. This has been discussed and agreed as a sensible approach by the Council. As such, the IJB’s Records Management Plan evidences compliance by referencing the Council’s Records Management Plans.” (*Memorandum of Understanding* section 1.5)

**The Keeper agreed the *Records Management Plan (RMP)* of West Dunbartonshire Council in August 2015:
[West Dunbartonshire Council and West Dunbartonshire Licensing Board Assessment Report \(nrscotland.gov.uk\)](http://nrscotland.gov.uk)**

In 2020 West Dunbartonshire Council provided the Keeper with an update on their *RMP*: [NRS - Progress Update Review \(PUR\) Final Report by the PRSA Assessment Team for West Dunbartonshire Council and West Dunbartonshire Licensing Board, March 2021 \(nrscotland.gov.uk\)](#)

Element	Present	Evidence	Notes
1. Senior Officer	G	G	<p>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> <p>West Dunbartonshire Integration Joint Board (the IJB) have identified Beth Culshaw, Chief Officer, as the individual with overall responsibility for records management in the authority.</p> <p>This is supported by a <i>Memorandum of Understanding</i> between the IJB and the Council which has been provided to the Keeper (<i>MoU</i> section 2).</p> <p>Ms Culshaw has endorsed the <i>Records Management Plan</i> (the <i>RMP</i>) and her signature appears on the cover sheet.</p> <p>The Chief Officer is also the IJB's Senior Information Risk Owner (SIRO).</p> <p>The Chief Officer Chairs the Joint Management Team, which has strategic</p>

			<p>responsibility for the Health and Social Care Partnership.</p> <p>The IJB have provided the Keeper with the job description for the Chief Officer which confirms this is the appropriate role to hold corporate responsibility for records management in the authority.</p> <p>The Keeper agrees that West Dunbartonshire Integration Joint Board have identified an appropriate individual to this role as required by 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>West Dunbartonshire Integration Joint Board have identified Michael Butler records Management Officer, West Dunbartonshire Council as the individual with day-to-day responsibility for implementing the <i>Records Management Plan</i> (the <i>RMP</i>) in the authority.</p> <p>As the public records of the IJB are managed entirely on the record keeping systems of West Dunbartonshire Council this is an appropriate identification.</p> <p>The Keeper's Assessment Team met with Mr Butler in the autumn of 2021 along with a representative of the IJB. The Keeper is satisfied that Mr Butler fully accepts the responsibilities of this role as they pertain to the public records of the IJB. This arrangement was confirmed by e-mail in March 2022. Particularly, it was agreed that the Council will liaise with the IJB in matters such as review (see element 13). The arrangement under which West Dunbartonshire Council manage the public records of the IJB is detailed in a Memorandum of Understanding between the authorities which has been supplied to the Keeper.</p>

			The Keeper agrees that West Dunbartonshire Integration Joint Board have identified a suitable individual to this role as required by the Act.
3. Policy	G	G	<p>The Act requires an authority to have an appropriate policy statement on records management.</p> <p>All the public records of West Dunbartonshire Integration Joint Board are managed electronically by West Dunbartonshire Council (see explanation above).</p> <p>The Keeper has been provided with a copy of a <i>Memorandum of Understanding</i> between the IJB and the Council which underpins this arrangement. “All of the IJB’s records will be subject to the policies and procedures of the Council.” (<i>MoU</i> section 1.6).</p> <p>As well as making it clear that the IJB’s records are created and managed by the partner body, it specifically states that the Chief Officer (see element 1) is satisfied that the partner body has appropriate records management arrangements in place. The Keeper is also satisfied on this point having agreed the Council <i>RMP</i> in 2015.</p> <p>Taking into account all of the above, it is clear that the public records of the IJB are managed under the <i>Records Management Policy</i> of the Council. The Keeper agreed this <i>Policy</i> was suitable in 2015.</p> <p>The Keeper agrees that West Dunbartonshire Integration Joint Board ensures that its public records are managed under a formal records management policy statement as required by the Act.</p>
4. Business Classification	A	G	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>West Dunbartonshire Integration Joint Board's <i>RMP</i> (page 4) confirms that "For records to perform their various functions, some form of management is needed. Management includes control over what is created, development of effective and efficient filing systems to store records, and procedures for retention of records."</p> <p>Many of the IJB's public records are published via the IJB's pages on West Dunbartonshire HSCP website http://www.wdhscp.org.uk/about-us/</p> <p>All the public records of the IJB are managed digitally on the record keeping systems of West Dunbartonshire Council (see explanation above). This is confirmed in a <i>Memorandum of Understanding</i> between the IJB and the Council which has been shared with the Keeper. It is also confirmed at several points in the <i>RMP</i> itself. For example against the Business Classification element on page 9: "The IJB will follow the corporate Business Classification Scheme (BCS) adopted by West Dunbartonshire Council which identifies its high-level functions and activities. These functions cut across the divisional structures of the Council, enabling the BCS to remain relevant in the event of structural changes to the organisation."</p> <p>The Keeper has already agreed that the business classification provision in West Dunbartonshire Council is appropriate.</p> <p>However, at the time of submission the Council's <i>BCS</i> had not been updated to include IJB records. The future developments column against element 4 of the <i>RMP</i> states: "West Dunbartonshire Council's <i>BCS</i> to be reviewed to take account of IJB's requirements". The Keeper requires an update on this issue.</p> <p>West Dunbartonshire Council are currently commissioning and implementing Microsoft 365 across the corporate estate and this project includes Records Management / Information Governance of which Business Classification will</p>
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			<p>be a part. The project is on-going and a Records Management Consultant has been very recently appointed. Once the public records of the IJB are included in the Council's <i>BCS</i> the Keeper will require a screen-shot of the relevant <i>BCS</i> area to confirm this. Please supply when possible. The IJB have committed that they "will be happy to provide evidence of this when it is in place" (<i>RMP</i> page 10)</p> <p>Until evidence can be provided that the public records of the IJB are covered in the records management structure of the Council, the Keeper can only agree this element of the IJB's <i>RMP</i> on 'improvement model' terms. This means that he is satisfied that the IJB is working towards robust provision under this element. His agreement is conditional on his being updated on any change.</p>
5. Retention schedule	G	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 noted above, West Dunbartonshire Integration Joint Board's <i>RMP</i> (page 4) confirms that "For records to perform their various functions, some form of management is needed. Management includes control over what is created, development of effective and efficient filing systems to store records, and procedures for retention of records." They also list as a core records management principle that "There are consistent and documented retention and disposal procedures, including provision for permanent preservation of archival records."</p> <p>The public records of the IJB are held digitally on the systems of West Dunbartonshire Council. The Keeper has previously agreed that these systems are suitable to ensure retention periods are allocated to all record types. Furthermore, the IJB <i>RMP</i> (page 10) states that "The partner body's retention policies and</p>

			<p>procedures (and records manager(s)) will assist the Board in making business-based disposal decisions against its records. These must take into consideration the IJB’s statutory obligations.” This is a very important statement as it shows that the IJB have direct input over the retention decisions applied to their information assets.</p> <p>The Council follows the Scottish Council on Archives Records Retention Scheme (SCARRS) and IJB document sets follow the retention periods noted or where none applies will make a retention period based on business need. The Keeper has previously endorsed the use of SCARRS for Scottish public authorities.</p> <p>The IJB have provided the Keeper with West Dunbartonshire Council’s retention schedule. This shows the retention decisions applied to Board administration and papers.</p> <p>The Keeper is satisfied that the IJB have ensured that their public records are allocated appropriate retention decisions, at time of creation, by their inclusion in the established retention processes in the Council.</p> <p>In 2015 the Keeper agreed that the retention processes in West Dunbartonshire Council were appropriate: West Dunbartonshire Council and West Dunbartonshire Licensing Board Assessment Report (nrscotland.gov.uk)</p> <p>Therefore, the Keeper agrees that West Dunbartonshire Integration Joint Board has a schedule providing retention decisions for the record types created while pursuing its functions.</p>
6. Destruction Arrangements	G	G	<p>The Act requires that public records are destroyed in a timely, controlled and secure manner.</p> <p>West Dunbartonshire Integration Joint Board’s <i>RMP</i> (page 4) lists as a core</p>

			<p>principle of records management the idea that “There are consistent and documented retention and disposal procedures, including provision for permanent preservation of archival records.”</p> <p><i>A Memorandum of Understanding</i> between the IJB and the West Dunbartonshire Council confirms that the Council creates, holds and manages into disposal all the IJB’s records (<i>RMP</i> page 7).</p> <p>"As such, the destruction of IJB records, in all formats, will be undertaken by West Dunbartonshire Council." (<i>RMP</i> page 11). All of the IJB’s public records are held in digital format.</p> <p>In 2015 the Keeper agreed that the destruction processes for public records in West Dunbartonshire Council were suitable.</p> <p>The Keeper agrees that West Dunbartonshire Integration Joint Board has processes in place to ensure the controlled, secure and irretrievable destruction of their public records when appropriate.</p>
7. Archiving and Transfer	A	G	<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>West Dunbartonshire Integration Joint Board’s <i>RMP</i> (page 4) lists as a core principle of records management the idea that “There are consistent and documented retention and disposal procedures, including provision for permanent preservation of archival records.”</p> <p>West Dunbartonshire IJB have adopted the archiving procedures of their partner authority, West Dunbartonshire Council. The Council uses its own in-house Archive</p>

			<p>Service which sits within the Communications, Culture, Communities and Facilities (CCCF) Service. The Keeper has already agreed that the archiving processes and the Council archive facilities are suitable for the transfer and preservation of records (August 2015).</p> <p>However, at the time of submission, the records of the IJB had yet to be included in the Council’s archiving agreement. The <i>RMP</i> states as a future development against element 7: “The agreed arrangement for the IJB’s records to be included in the archiving and transferring arrangements established by West Dunbartonshire Council.”</p> <p>Once the public records of the IJB are included in the Council’s archive transfer arrangements the Keeper will require a statement to that effect, preferably from the Council archivist, and evidence in the form of a copy of any transfer guidance documents that show the inclusion of the records of the IJB. Please supply when possible.</p> <p>The public records of the IJB are held in digital format. The Keeper acknowledges 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 recognises that West Dunbartonshire IJB has taken steps to pursue these arrangements.</p> <p>The Keeper is content to agree this element of the West Dunbartonshire Integration Joint Board’s <i>Records Management Plan</i> under ‘improvement model’ terms. This means that the authority has identified a gap in provision (in this case that the IJB records do not yet appear in the archive transfer arrangements), but are taking steps to close that gap. The Keeper’s agreement is conditional on his being informed when the transfer arrangements are</p>
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			suitably updated.
8. Information Security	G	G	<p>The Act requires that public records are held in accordance with information security compliance requirements.</p> <p>West Dunbartonshire Integration Joint Board's <i>RMP</i> (page 4) lists as a core principle of records management the idea that "Records will be secure from unauthorised or inadvertent alteration or erasure, that access and disclosure will be properly controlled and audit trails will track all use and changes."</p> <p>The <i>RMP</i> makes it clear that all IJB Records are held electronically on West Dunbartonshire Council's system (for example <i>RMP</i> page 11).</p> <p>As this is the case, the IJB relies on the information security arrangements operated by the Council. In 2015 the Keeper agreed that these were suitable.</p> <p>The <i>RMP</i> correctly points out that the information security responsibilities placed on individual staff members when creating public records remain those imposed by their contracts of employment and therefore both the Council and the Health Board's information security policies may apply to this element. The Keeper has also agreed that the information security provision in NHS Greater Glasgow and Clyde is suitable.</p> <p>Staff new to the IJB will be appropriately trained in information security principles at induction by the Records Manager of West Dunbartonshire Council (see element 12). This is supported in a <i>Memorandum of Understanding</i> between the IJB and the Council which has been shared with the Keeper. Section 1.6 refers to the Council providing "appropriate training, e.g. Data Protection, Information Security, etc."</p> <p>The Keeper agrees that West Dunbartonshire Integration Joint Board can be</p>

			satisfied that processes are in place to properly ensure the security of their public records.
9. Data Protection	G	G	<p>The Keeper expects a Scottish public authority to manage records involving personal data in compliance with data protection law.</p> <p>As with all other Scottish public authorities West Dunbartonshire Integration Joint Board have been required to comply with data protection procedures imposed by the 2018 data protection legislation (GDPR and DP2018).</p> <p>However, the IJB is not separately registered with the Information Commissioner as a data controller and has delegated this to the Council. This is acknowledged in the <i>RMP</i> (page 14).</p> <p>The Keeper has already agreed that the data protection processes operated by West Dunbartonshire Council are appropriate (August 2015). However, it should be noted that aspects of this provision will have changed following the implementation of the Data Protection Act 2018 (and GDPR). The Keeper accepts that the Council (and therefore the IJB) are still compliant under this element. Council compliance can be evidenced from the Council website: Data protection West Dunbartonshire Council (west-dunbarton.gov.uk)</p> <p>Staff new to the IJB will be appropriately trained in data protection principles by the Records Manager of West Dunbartonshire Council (see element 12) at induction. This is supported in a <i>Memorandum of Understanding</i> between the IJB and the Council which has been shared with the Keeper. Section 1.6 refers to the Council providing "appropriate training, e.g. Data Protection, Information Security, etc."</p> <p>Although Data protection training for IJB staff is <u>provided</u> by the Council, it should be noted that NHS staff using IJB records in partnership will be subject to the data</p>

			<p>protection policy of their employer. The Keeper has already agreed that the data protection provision of NHS Greater Glasgow and Clyde is compliant with the Act (October 2016).</p> <p>The Keeper agrees that West Dunbartonshire 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>The public records of West Dunbartonshire Integration Joint Board are managed digitally on the systems of West Dunbartonshire Council. The IJB's records will therefore be subject to the policies and procedures of the Council in relation to business continuity.</p> <p>This arrangement is supported by a <i>Memorandum of Understanding</i> between the IJB and the Council (section 1.6): ""The IJB's records are managed in accordance with the Council's Business Continuity and vital records arrangements.""</p> <p>In 2015 the Keeper agreed that the business continuity arrangements of West Dunbartonshire Council were suitable.</p> <p>The Keeper agrees that West Dunbartonshire Integration Joint Board has ensured that their public records are subject to robust record recovery procedures and furthermore that they have identified which of their public records might be considered 'vital' to their operation.</p>
11. Audit trail	G	G	<p>The Keeper expects an authority to have processes in place to track public records</p>

			<p>in such a way that their location is known and changes recorded.</p> <p>West Dunbartonshire Integration Joint Board's <i>RMP</i> (page 4) lists as a core principle of records management the idea that "Records will be secure from unauthorised or inadvertent alteration or erasure, that access and disclosure will be properly controlled and audit trails will track all use and changes." And "Records and the information within them can be efficiently retrieved by those with a legitimate right of access, for as long as the records are held by the organisation."</p> <p>All the public records of the IJB are held digitally on the systems operated by West Dunbartonshire Council. As such the audit trail, tracking and identification process applied to those records are those of the Council. This arrangement is supported by a <i>Memorandum of Understanding</i> between the IJB and the Council which has been provided to the Keeper and which states (section 1.6): "The Council's Audit Trail arrangements will ensure that records are retrievable and offer certainty around version control."</p> <p>The Keeper has already agreed the audit trail provision of the Council is appropriate and able to support the aims of the IJB as explained in the introduction to their <i>RMP</i> (quoted above).</p> <p>The Keeper agrees West Dunbartonshire 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</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 IJB recognises this. They state in their <i>RMP</i> that one of the 'principles of records management' is that "all staff are informed of their record-keeping</p>

<p>staff</p>			<p>responsibilities through appropriate training and guidance and if required further support as necessary.” (<i>RMP</i> page 4).</p> <p>This is supported in a <i>Memorandum of Understanding</i> between the IJB and the Council which has been shared with the Keeper. Section 1.6 refers to the Council providing "appropriate training, e.g. Data Protection, Information Security, etc."</p> <p>The <i>RMP</i> explains under element 12 (page 17) that responsibility for ensuring relevant staff of the IJB undertake records management training lies with the partner bodies West Dunbartonshire Council and NHS Greater Glasgow and Clyde (as the employers).</p> <p>However, it is clear in the <i>RMP</i> and in the <i>Memorandum of Understanding</i> that the training will be <u>provided</u> by the Council’s Records Manager (see element 2). In 2015 the Keeper agreed that the records management training provision in West Dunbartonshire Council was suitable.</p> <p>Therefore, the Keeper can agree that West Dunbartonshire Integration Joint Board properly consider relevant training for their staff when required.</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 <i>RMP</i> under review.</p> <p>The IJB recognises this. The <i>RMP</i> states “The plan will be continuously reviewed and updated. Reports will be submitted annually to the newly established Records Management Planning Group, before formal ratification by the Integration Joint Board.” (<i>RMP</i> page 5) and that the “Review of West Dunbartonshire Council’s Records Management Plan will be submitted annually to Senior Council Management and as this Records Management Plan is in line with Council’s, the IJB’s Records Management Plan will be updated and submitted to the IJB for approval.” (<i>RMP</i> page 6)</p>

			<p>Furthermore, the introduction to the <i>RMP</i> explains that “This RMP sets out and evidences proper arrangements for the management of the IJB’s public records and is submitted for agreement by the Keeper of the Records of Scotland under Section 1 of the Public Records (Scotland) Act 2011. It will be reviewed by the IJB annually.” The Keeper of the Records of Scotland’s PRSA Assessment Team will provide the IJB with a Progress Update Review (PUR) template annually. The completion and submission of this template is entirely voluntary, but the IJB might consider utilising the PUR process as a prompt for annual review.</p> <p>The <i>RMP</i> (page 18) makes it clear that the responsibility for reviewing the records management arrangements, to which the public records of the IJB are subject, lies with the Council. As all record are managed under Council systems this is appropriate. The Keeper has already agreed that the review mechanisms in West Dunbartonshire Council are suitable.</p> <p>It is clear from the <i>RMP</i> that the Council reports its review findings to the IJB.</p> <p>This arrangement is supported by a Memorandum of Understanding between the IJB and the Council. Section 1.6 states “The IJB will rely on the Council to ensure that the systems, policies and procedures that govern its records are being regularly assessed. An annual review will be undertaken by a group nominated by the IJB to ensure this is carried out effectively.”</p> <p>The Keeper understands that this refers to the RMP Planning Group mentioned in the <i>RMP</i>.</p> <p>The Keeper agrees that West Dunbartonshire Integration Joint Board have made a firm commitment to review their <i>RMP</i> as required by the Act and have explained who will carry out this review and by what methodology.</p>
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<p>14. Shared Information</p>	<p>G</p>	<p>G</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, West Dunbartonshire Integration Joint Board shares information with other bodies when appropriate and does so under information sharing processes set out in an <i>Information Sharing Protocol</i> which has been supplied to the Keeper. This is the December 2019 version which includes the 'Integration Joint Boards of the Area'.</p> <p>The Keeper would like to point out that the version currently online at the NHS Greater Glasgow and Clyde Website appears to be an earlier version: https://www.nhs.uk/media/236748/124-nhs-ggc-protocol-for-sharing-information.pdf</p> <p>The Keeper agrees that the <i>Information Sharing Agreement</i> appropriately considers information governance issues.</p> <p>The Keeper can agree that West Dunbartonshire Integration Joint Board properly considers records governance when undertaking information sharing programmes.</p>
<p>15. Public records created or held by third parties</p>	<p>N/A</p>	<p>N/A</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>RMP</i> clearly states "In relation to the model Records Management Plan's new Element 15, the IJB Board does not commission any third parties to process or store</p>

			<p>records for any board functions.” (<i>RMP</i> page 4)</p> <p>The Keeper is content that this element does not apply to the public records of West Dunbartonshire Integration Joint Board.</p>
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West Dunbartonshire Integration Joint Board
(‘The IJB’ in the assessment below)

Explanation: All public records of the West Dunbartonshire Integration Joint Board are held on West Dunbartonshire 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 under element 4) and in a *Memorandum of Understanding* signed by the Chief Officer of the IJB and the Chief Executive of the Council. A signed copy of the *Memorandum of Understanding* has been provided to the Keeper.

“The Parties acknowledge and agree that the responsibility for creating and maintaining the IJB’s records will be delegated to the Council. The IJB will follow the corporate Business Classification Scheme (BCS) adopted by the Council and the Council’s BCS has been updated to include IJB records. This has been discussed and agreed as a sensible approach by the Council. As such, the IJB’s Records Management Plan evidences compliance by referencing the Council’s Records Management Plans.” (*Memorandum of Understanding* section 1.5)

The Keeper agreed the *Records Management Plan (RMP)* of West Dunbartonshire Council in August 2015:
[West Dunbartonshire Council and West Dunbartonshire Licensing Board Assessment Report \(nrscotland.gov.uk\)](https://www.nrscotland.gov.uk/information/assessments/west-dunbartonshire-council-and-west-dunbartonshire-licensing-board)

In 2020 West Dunbartonshire Council provided the Keeper with an update on their *RMP*: [NRS - Progress Update Review \(PUR\) Final Report by the PRSA Assessment Team for West Dunbartonshire Council and West Dunbartonshire Licensing Board, March 2021 \(nrscotland.gov.uk\)](https://www.nrscotland.gov.uk/information/assessments/west-dunbartonshire-council-and-west-dunbartonshire-licensing-board)

General Notes on submission:

Version

This assessment is on the *Records Management Plan* (the *RMP*) of West Dunbartonshire Integration Joint Board (the IJB), version 2.0 submitted March 2022. The *RMP* (v1.0) was originally submitted for the Keeper's agreement on 5th March 2019.

The *RMP* was accompanied by a *Memorandum of Understanding* signed by the Chief Officer of the IJB and the Chief Executive of the Council. It was also accompanied by a copy of the Greater Glasgow and Clyde Protocol for sharing information between the Council and the Health Board (see element 14).

The *RMP* is endorsed, and signed on the front cover, by Beth Culshaw Chief Officer (see element 1).

The *RMP* states that robust records management processes allow an authority to 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.”

(*RMP* page 3)

The Keeper agrees that the IJB's *Plan* should assist these aims.

The *Plan* mentions the Act and is based on the Keeper's, 14 element Model Plan which was in place at the time of the original submission. The Model Plan now contains 15 elements (see element 15 above). <http://www.nrscotland.gov.uk/record-keeping/public-records-scotland-act-2011/resources/model-records-management-plan>.

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 **West Dunbartonshire Integration Joint Board**. Policies and governance structures are in place to implement the actions required by the plan.

4. Business Classification

7. Archiving and Transfer

7. Keeper's Determination

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

- The Keeper recommends that West Dunbartonshire 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

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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 West Dunbartonshire Integration Joint Board. In agreeing this RMP, the Keeper expects West Dunbartonshire Integration Joint Board to fully implement the agreed RMP and meet its obligations under the Act.



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