

**Public Records (Scotland) Act 2011**

**Dundee City Integration Joint Board**

**The Keeper of the Records of Scotland**

**11<sup>th</sup> May 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 Dundee City Integration Joint Board by the Public Records (Scotland) Act 2011 Assessment Team following its submission to the Keeper on 27<sup>th</sup> September 2021.

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

## 3. Authority Background

### Description of Authority:

[DHSCP - Who We Are | Dundee Health and Social Care Partnership \(dundeehscp.com\)](https://www.dundeehscp.com)

NHS Tayside and Dundee City Council agreed an Integration Scheme for Dundee, which was approved by Scottish Ministers in September 2015. This enabled the order to come into force, which established an Integration Joint Board (IJB) in October 2015. The Integration Scheme sets out the functions that are delegated by NHS Tayside and Dundee City Council to the IJB. The IJB is responsible for the planning, oversight and delivery of integrated functions.

The IJB operates as a body corporate (a separate legal entity), acting independently of NHS Tayside and Dundee City Council. The IJB consists of six voting members appointed in equal number by NHS Tayside and Dundee City Council, with a number of representative members 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 key functions of the IJB are to:

Prepare a plan for integrated functions that is in accordance with national and local outcomes and integration principles.

Allocate the integrated budget in accordance with the Plan.

Oversee the delivery of services that are within the scope of the Partnership.

The priorities for the Dundee Health and Social Care Partnership are set out in a series of strategies which can be accessed from their website:

[Publications | Dundee Health and Social Care Partnership \(dundeehscp.com\)](https://www.dundeehscp.com)

For the purposes of the Public Records (Scotland) Act, the Board (scheduled as the Dundee City Integration Joint Board) is the scheduled authority rather than a 'Health & Social Care Partnership'. The records managed under the Dundee Integration Joint Board *RMP* are those of the administration and output of the IJB itself, not those of the partner bodies as they carry out activities under the instruction of the IJB. Those records are covered by the respective plans of NHS Tayside and of Dundee City 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 Dundee City Integration Joint Board’s RMP was developed with proper regard to the elements of the Model Plan and is compliant with the Act. The assessment also considered whether there was sufficient supporting evidence of such compliance.

**Key:**

<b>G</b>	The Keeper agrees this element of an authority’s plan.		<b>A</b>	The Keeper agrees this element of an authority’s plan as an ‘improvement model’. This means that he is convinced of the authority’s commitment to closing a gap in provision. He will request that he is updated as work on this element progresses.		<b>R</b>	There is a serious gap in provision for this element with no clear explanation of how this will be addressed. The Keeper may choose to return the RMP on this basis.
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## 5. Model Plan Elements: Checklist

**Dundee City Integration Joint Board**  
(‘The IJB’ in the assessment below)

**Explanation: All public records of Dundee City Integration Joint Board are held on Dundee City 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 9) and in a *Covering Letter* from the Chief Officer of the IJB.**

**“I confirm that Dundee City Council creates, holds and manages the disposal of the IJB’s records..” (*Covering Letter from IJB CO* – see under General Comments below).**

**The Keeper agreed the *Records Management Plan* of Dundee City Council in March 2020:  
[Dundee City Council and Dundee City Licensing Board Assessment Report \(nrscotland.gov.uk\)](https://www.nrscotland.gov.uk/publications/dundee-city-council-and-dundee-city-licensing-board-assessment-report)**

Element	Present	Evidence	Notes
1. Senior Officer	<b>G</b>	<b>G</b>	<p>Dundee City Integration Joint Board have identified Vicky Irons, 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 Ms. Irons.</p> <p>The responsibility for all aspects of the operational management of the IJB clearly lies with the Chief Officer. This is confirmed in the IJB <i>Scheme of Delegation</i> (section 5.1.1) and in the foundational <i>Integration Scheme</i> document (sections 4.2, 4.4 and 6), both of which have been provided to the Keeper.</p> <p>The Chief Officer endorses the <i>RMP</i> (<i>RMP</i> page 1) and is the document owner (<i>Covering Letter</i>).</p> <p>The Chief Officer is the Accountable Officer for Health and Social Care Integration to the Integration Joint Board in all matters except finance (<i>Scheme of Integration</i> section 6.6).</p> <p>The <i>Scheme of Integration</i> (section 4.13) explains that the Chief Officer is responsible for reporting to the Board on services provided by the partner authority. Information Governance services are specifically mentioned in the <i>Scheme</i> as one of the issues on which the Chief Officer is required to report.</p> <p>The Keeper agrees that Dundee City 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	<b>G</b>	<b>G</b>	The Act requires that each authority identifies an individual staff member as holding



<p>Manager</p>			<p>operational responsibility for records management and has appropriate corporate responsibility, access to resources, and skills. Due to the partnership nature of the arrangements affecting an IJB, the Keeper has determined that two individuals may be identified to this role if appropriate.</p> <p>Dundee City Integration Joint Board have identified Clare Lewis-Robertson, Senior Officer (Business Planning and Information Governance), as the individual with day-to-day responsibility for monitoring the implementation of the <i>RMP</i>.</p> <p>This identification is confirmed in the <i>Covering Letter</i> from the Chief Officer.</p> <p>Clare Lewis-Robertson is the author of the <i>RMP</i>.</p> <p>Clare Lewis-Robertson has a postgraduate records management qualification.</p> <p>The Keeper has been provided evidence that information governance features as a formal objective for the IJB Senior Officer (Business Planning and Information Governance) in the form of a job description. For example “Strategic management of the Department’s information governance processes. Lead, negotiate and develop internal and external information sharing protocols and frameworks with Legal Services, partner agencies and other organisations.” With appropriate support from Dundee City Council, on whose systems the public records of the IJB are managed, the Keeper agrees that Ms Lewis-Robertson has sufficient understanding of the processes in the IJB.</p> <p>With this support in mind, the <i>RMP</i> states (page 22) that the IJB can rely on the Advice and support from the Archivist of Dundee City Council. The IJB have provided the Keeper with an e-mail from Sarah Aitken, Records Manager/Assistant Archivist at Dundee City Council, which confirms this and supports the explanation of arrangements given above. The Keeper notes that Ms Aitken is the PRSA ‘Key</p>
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			<p>Contact' at the Council.</p> <p>The Keeper agrees that Dundee City Integration Joint Board has identified an appropriate individual to this role, as required by the Act.</p>
3. Policy	<b>G</b>	<b>G</b>	<p>The Act requires an authority to have an appropriate policy statement on records management.</p> <p>The Keeper has received a <i>Covering Letter</i> from the Chief Officer of the IJB confirming that Dundee City Council creates, holds and manages the disposal the IJB's public records.</p> <p>As all the public records of the IJB are held digitally on the records management systems of Dundee City Council, they have chosen to adopt the <i>Records Management Policy</i> of the Council.  <a href="https://www.dundee.gov.uk/sites/default/files/publications/Records%20Management%20Policy%20v2.1.pdf">https://www.dundee.gov.uk/sites/default/files/publications/Records%20Management%20Policy%20v2.1.pdf</a> This is entirely appropriate.</p> <p>The Keeper has already agreed that the Council's <i>Records Management Policy</i> is a suitable overarching statement for the management of public records (March 2020).</p> <p>The <i>RMP</i>, in the compliance statement against element 9 notes that the IJB is not itself an employer (<i>RMP</i> page 18). The Keeper accepts that all staff creating and managing records on behalf of the IJB are employees of Dundee City Council.</p> <p><b>The Keeper notes that the IJB have recognised that in some areas the record management provision of the Council, and therefore indirectly of the IJB itself, is not yet fully developed (for example this is made clear in a statement on <i>RMP</i> page 4). This is the case under elements 4, 5, 6, 7 and 11 of the Council <i>RMP</i> which was agreed in 2020. The Keeper has confirmed that the status of</b></p>

			<p>his agreement of any element of an IJB plan will mirror that of the partner body on whose records management provision that element relies. In this case, the Keeper would expect Dundee City IJB to liaise with the Council to remain fully informed in improvement programmes being pursued against these elements. The Keeper notes that Dundee City Council have committed to providing him with regular updates on progress using the Progress Update Review (PUR) methodology. The Keeper has been provided with an e-mail from the Council Records Manager (see element 2 above) that confirms they “will share with the IJB the results of any review of records management procedure that might be carried out by the Council.”</p> <p>The Keeper agrees that Dundee City Integration Joint Board has adopted an operational policy which sets out the corporate approach to records management as required by the Act.</p>
4. Business Classification	<b>A</b>	<b>G</b>	<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 IJB understand this principle. They state in their <i>RMP</i>: “Records are vital for the effective functioning of the IJB: they support the decision making; document its aims, policies and activities; and ensure that legal, administrative and audit requirements are met. 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.” (<i>RMP</i> page 8)</p> <p>At the time of the original <i>Dundee Health and Social Care Integration Scheme</i> there was the clear intention that support services (information governance is specifically mentioned), would be provided by one or other of the partners (<i>Scheme</i> section 4.13) although the specific arrangements had not been settled.</p>

			<p>The Keeper has now received a <i>Covering Letter</i> from the Chief Officer of the IJB, dated September 2021, confirming that Dundee City Council creates, holds and manages the disposal the IJB’s public records. This letter clearly supports the arrangements explained in the <i>RMP</i>. For example page 9: “The IJB has agreed with Dundee City Council that all of the IJB’s records will be managed by Dundee City Council.”</p> <p>Following the IJB’s original submission, they have provided the Keeper with a screen shot showing IJB records held on Dundee City Council’s CERDMS records management system.</p> <p>The responsibilities of the IJB are clearly set out in the <i>Scheme of Delegation</i> (section 4). The <i>RMP</i> confirms that it applies to records created by the IJB as it undertakes these responsibilities. It does not apply to records created by the Council or by NHS Tayside as they carry out activities under the direction of the IJB. “The context of this plan is that most records including employment, service user and internal policies and procedures will continue to be managed in the parent body organisations, i.e. Dundee City Council and NHS Tayside and as such will be covered by their respective record management plans.” (<i>RMP</i> page 9). This is a correct understanding of the records covered by the IJB <i>RMP</i>.</p> <p>The <i>RMP</i> clearly states that all records of the IJB are managed digitally. (<i>RMP</i> page 15)</p> <p>As all the public records of the IJB are managed on the record keeping systems of Dundee City Council it is entirely appropriate that these records feature as part of the <i>Council’s Business Classification Scheme (BCS)</i>.</p> <p>A detailed description of how the Council’s BCS is being developed has been</p>
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			<p>supplied by the IJB. This is welcome.</p> <p><b>However, the IJB <i>RMP</i> acknowledges that the Council’s <i>BCS</i> is a work in progress (<i>RMP</i> page 13), as does the Keeper’s 2020 <i>Dundee City Council Agreement Report</i>. When the <i>BCS</i> is fully populated and rolled-out the Keeper will require evidence that IJB records feature. A screen shot showing relevant records on Council systems should suffice.</b></p> <p><b>As the Council is in a developing stage for this element the Keeper is not able to fully agree it for a partner whose public records are managed on Council systems.</b></p> <p><b>Therefore, 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 ‘host’ authority.</b></p>
5. Retention schedule	<b>A</b>	<b>G</b>	<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 understand this principle. They state in their <i>RMP</i>: “Records are vital for the effective functioning of the IJB: they support the decision making; document its aims, policies and activities; and ensure that legal, administrative and audit requirements are met. 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.” and a 'records management principle' that: “There are consistent and documented retention and disposal procedures, including provision for permanent preservation of archival records” (both <i>RMP</i> page 8)</p>

			<p>The public records of the IJB are managed digitally on the record keeping systems of Dundee City Council. It is appropriate therefore that they are included in the Council's retention schedule.</p> <p>In 2020 the Keeper agreed the retention procedures in Dundee City Council.</p> <p><b>However, he did this under 'improvement model' terms. This means that the Council had identified gaps in provision (some record types were not covered by the generic schedule and the schedule is not automatically applied to shared drives). The Keeper's agreement was dependent upon the his being kept informed of progress with this work to rectify this situation. The Council has committed to doing this through annual updates (see element 3 for more on this point).</b></p> <p><b>The compliance statement against this element (<i>RMP</i> page 14) recognises that the Council is not fully compliant in this area.</b></p> <p><b>The compliance statement goes on to explain the retention procedures in the Council. The Keeper accepts that much of this has been copied across from the Council's submission. Generally, the Keeper considers that parts of the text on page 14 of the IJB's <i>RMP</i> might be confusing as much that it details, although factually correct, does not apply to IJB records. As with elements 6 and 11 below, the Keeper suggests that, at the time of the next update, the compliance statement should be reduced to only those aspects that apply to IJB.</b></p> <p><b>The Keeper has determined that no element of an IJB <i>RMP</i> can be awarded a higher RAG status than that applying to the same element in the plan of the authority on whose systems the IJB public records are managed.</b></p>
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			<p>Therefore, the Keeper agrees this element of the Dundee City Integration Joint Board's <i>Records Management Plan</i> under the same improvement model as the 'host' authority.</p>
<p>6. Destruction Arrangements</p>	<p><b>A</b></p>	<p><b>G</b></p>	<p>The Act requires that public records are destroyed in a timely, controlled and secure manner.</p> <p>The IJB lists, as a 'records management principle' that: "There are consistent and documented retention and disposal procedures, including provision for permanent preservation of archival records" (RMP page 8)</p> <p>The <i>Record Management Policy</i> of Dundee City Council, which the IJB has adopted (see element 3), recognises that the records it creates or holds are public assets that must be managed into destruction or permanent preservation as appropriate.</p> <p>The public records of the IJB are managed digitally on the record keeping systems of Dundee City Council. As this is the case, the Keeper agrees that they should be subject to the record destruction procedures of the Council.</p> <p><b>The compliance statement also provides a description of what procedures are in place generally in the Council. The Keeper considers this might be confusing as much of it does not apply to IJB records. The Keeper requests that the IJB consider removing any reference to procedures relating to Council record management, where they do not apply to IJB records, in future updates of the <i>RMP</i> (see also elements 5 and 11)</b></p> <p><b>The Keeper agreed the destruction processes employed by Dundee City Council were suitable in 2020. However, his agreement was under 'improvement model' terms. This means that the Council had recognised a gap in its records management provision (the controlled systematic</b></p>

			<p>destruction of <u>all</u> digital records in line with the Retention Schedules) and had put a project in place to close that gap. The Keeper’s agreement on this aspect of ‘destruction’ was conditional on his being updated on progress. The Council has committed to doing this through annual updates.</p> <p>The Keeper has determined that no element of an IJB <i>RMP</i> can be awarded a higher RAG status than that applying to the same element in the authority on whose systems the IJB public records are managed.</p> <p>Therefore, the Keeper agrees this element of the Dundee City Integration Joint Board’s <i>Records Management Plan</i> under the same improvement model as the ‘host’ authority.</p>
7. Archiving and Transfer	<b>A</b>	<b>G</b>	<p>The Act requires that all Scottish public authorities identify a suitable repository for the permanent preservation of any records considered suitable for archiving. A formal arrangement for transfer to that repository must be in place.</p> <p>The IJB recognise this and state in their <i>RMP</i> (page 7) the "Good recordkeeping practices lead to...Preservation of vital and historical records". and, as a 'records management principle', that: "There are consistent and documented retention and disposal procedures, including provision for permanent preservation of archival records" (<i>RMP</i> page 8).</p> <p>To this end they have adopted the archiving procedure of their partner, Dundee City Council, on whose systems the public records of the IJB are managed. Any records of the IJB that are identified for permanent preservation would be transferred, under the Council archiving processes, to Dundee City Archives.</p> <p>The <i>Record Management Policy</i> of Dundee City Council, which the IJB has adopted (see element 3), recognises that the records it creates or holds are public assets</p>



			<p>that must be managed into destruction or permanent preservation as appropriate.</p> <p>In 2020 the Keeper agreed this element of Dundee City Council’s RMP.</p> <p><b>However, he did so under improvement model terms stating that: “The Keeper acknowledges that as part of the Forward Plan the Council commits to “Investigate and introduce a digital archive”. The Keeper accepts this, and will be interested in learning of developments in this area....The Keeper has expressed concerns regarding Dundee City Council’s archive store....The Keeper can agree this element of Dundee City Council’s Records Management Plan on ‘improvement model’ terms. This means that the authority has recognised a gap in their records management provision and have put processes in place to close that gap.” The Keeper’s agreement was conditional on his being updated as this work proceeds.</b></p> <p><b>As noted above, the Keeper will not agree any element of an IJB plan at a higher RAG status than that afforded the partner organisation on whose systems the IJB records are managed.</b></p> <p><b>Therefore, 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 ‘host’ authority.</b></p>
<p>8. Information Security</p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>The Act requires that public records are held in accordance with information security compliance requirements.</p> <p>The IJB lists, as a 'records management principle' 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. Records will be held in a robust format which remains readable for as long as records are required”</p>

			<p>(RMP page 8)</p> <p>The <i>Record Management Policy</i> of Dundee City Council, which the IJB has adopted (see element 3), recognises that the records it creates or holds are public assets that must be protected under secure systems.</p> <p>Dundee City Integration Joint Board’s information security is supported by Dundee City Council’s IT service. As all the public records of the IJB are held on Dundee City Council systems, the Keeper agrees that this is entirely appropriate.</p> <p>The <i>RMP</i> gives an explanation of the security procedures applied to public records and, in evidence, the IJB have provided the Keeper with a copy of the Council’s latest <i>Information and Communication Technology Security and Safe Use Policy</i>. For the purposes of this assessment the Keeper understands that all personnel managing IJB records are Council employees and will be subject to, and have access to, this policy.</p> <p>The Keeper agrees that Dundee City Integration Joint Board has ensured that its information assets are subject to appropriate measures to protect its information.</p>
9. Data Protection	<b>G</b>	<b>G</b>	<p>The Keeper expects a Scottish public authority to manage records involving personal data in compliance with data protection law.</p> <p>Dundee City Integration Joint Board are registered with the Information Commissioner as a data controller. They have provided the Keeper with a copy of their <i>Registration Certificate</i> (September 2021 – September 2022). Registration number: ZB211094.</p> <p>As a data controller, the IJB must nominate a Data Protection Officer. They have identified Ian Smail, Information Governance Manager Dundee City Council, to this</p>

			<p>role. As all the records of the IJB are held on the Council's record keeping systems the identification of Mr Smail is entirely appropriate.</p> <p>The Keeper agrees that that Dundee City Integration Joint Board have appropriate arrangements in place to comply with current data protection legislation.</p>
<p>10. Business Continuity and Vital Records</p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>The Keeper expects that record recovery, prioritising vital records, is an integral part of the authority's business continuity planning.</p> <p>The IJB state: "All IJB records are held by Dundee City Council. As such there is no direct requirement for the IJB to have its own arrangements for business continuity of vital records." (<i>RMP</i> page 19) The Keeper agrees this principle.</p> <p>The Keeper has already agreed the business continuity arrangements in Dundee City Council properly consider the recovery of records in an emergency (March 2020).</p> <p>The RMP explains the business continuity arrangements in the Council as they pertain to public records.</p> <p>The IJB have also provided the Keeper with a copy of a suite of business continuity policies and procedures as they will apply to the recovery of the IJB's information assets as part of the Council's business continuity planning.</p> <p>For the purposes of this assessment the Keeper understands that all personnel managing IJB records are Council employees and will be subject to, and have access to, these policies and procedures.</p> <p>The Keeper agrees that Dundee City Integration Joint Board has ensured that there are adequate procedures to recover their public records in an emergency.</p>

11. Audit trail	<b>A</b>	<b>G</b>	<p>The Keeper expects an authority to have process in place to track public records in such a way that their location is known and changes recorded.</p> <p>The IJB lists, as a 'records management principle' 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. Records will be held in a robust format which remains readable for as long as records are required" and that "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 "(both <i>RMP</i> page 8)</p> <p>The public records of Dundee City Integration Joint Board are managed on the record keeping systems of Dundee City Council. It is therefore appropriate that the IJB relies on the tracking and identification processes of the Council systems. The Keeper agreed these processes in 2020.</p> <p><b>However, he did so under 'improvement model' terms This means that the Council had identified gaps in provision (lack of audit trail provision in shared drives and of operational naming convention/version control guidance) and has identified solutions to close these gaps. The agreement with the Council was conditional upon the Keeper being kept informed of progress.</b></p> <p><b>The Keeper notes that, in support of the arrangement under which the Council's 'audit trail' provision will apply to IJB records – which the Keeper agrees as sensible – the <i>RMP</i> provides a compliance statement that explains the entire record-tracking procedures in the Council even when these procedures do not apply to IJB records (such as departments having space allocated in the Council record store for their paper records). There is no need for these details to be included in the IJB's plan and, although correct as it</b></p>

			<p>applies to the Council, the Keeper feels that this statement may be confusing in an IJB plan. The Keeper requests that the IJB consider removing any reference to procedures relating to Council record management, where they do not apply to IJB records, in future updates of the <i>RMP</i> (see also elements 5 and 6).</p> <p>The Keeper has determined that no element of an IJB <i>RMP</i> can be awarded a higher RAG status than that applying to the same element in the authority on whose systems the IJB public records are managed.</p> <p>Therefore, the Keeper agrees this element of the Dundee City Integration Joint Board's <i>Records Management Plan</i> under the same improvement model as the 'host' authority.</p>
<p>12. Competency Framework for records management staff</p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>The Keeper expects staff creating, or otherwise processing records, to be appropriately trained and supported.</p> <p>The IJB lists, as a 'records management principle' that: "all staff are informed of their record-keeping responsibilities through appropriate training and guidance and if required further support as necessary" (<i>RMP</i> page 8)</p> <p>The IJB also commits to ensuring that "all staff receive training relating to Records Management, Information Security, Data Protection and Freedom of Information during their induction." (<i>RMP</i> page 12). All IJB staff are Dundee City Council employees. In 2020 the Keeper agreed that staff training in Dundee City Council was suitable for the management of public records.</p> <p>Staff are alerted to updates on current issues through all staff emails or using warning messages on the staff intranet pages.</p>

			<p>The Keeper agrees that Dundee City Integration Joint Board provide relevant information governance training for staff.</p>
<p>13. Assessment and Review</p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>Section 1(5)(i)(a) of the Act says that an authority must keep its RMP under review. This is acknowledged by the IJB (<i>RMP</i> page 7).</p> <p>It is the responsibility of the Chief Officer to ensure that arrangements are reviewed: "...arrangements will be reviewed through regular reports from the Chief Officer to the Integration Joint Board". (<i>Integration Scheme</i> section 4.13)</p> <p>As the public records of the IJB are held on the records keeping system of Dundee City Council, and all staff working with IJB records are employees of the Council (<b>see element 3</b>), the Board relies on the Council review methodology under this element. This has already been agreed by the Keeper (March 2020). The results of any review are reported to the Chief Officer annually and the Chief Officer then reports to the IJB (see above).</p> <p>The <i>RMP</i> confirms this arrangement on page 9: "The plan will be continuously reviewed and updated. Reports will be submitted annually to the Senior Management team, before formal ratification by the Integration Joint Board"</p> <p>The Keeper has been provided with an e-mail from the Council Records Manager (see element 2 above) that confirms they "will share with the IJB the results of any review of records management procedure that might be carried out by the Council."</p> <p>Review of arrangements is embedded throughout the <i>Scheme of Integration</i> that is the foundational document of the partnership. For example the <i>Information Sharing Agreement</i> (see element 14) is reviewed by all parties, including the IJB, annually (<i>Scheme of Integration</i> section 10.6).</p>

			The Keeper agrees that Dundee City Integration Joint Board have processes in place to ensure that their <i>Records Management Plan</i> , and records management provision generally, are kept under review as required by the Act. This will be done by the partner authority on whose systems the public records of the IJB are managed.
14. Shared Information	<b>G</b>	<b>G</b>	<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>The IJB is a member of the Tayside Data Sharing and Information Governance Group "which is a group that ensures there are appropriate high level information sharing protocols in place to govern information sharing and data handling arrangements." (<i>Scheme of Integration</i> section 10.1)</p> <p>The Keeper has been provided with a copy of a sample <i>Data Sharing Agreement</i> between the IJB and the NHS NSS and with a <i>Memorandum of Understanding</i> on information sharing between Dundee Integration Joint Board, NHS Tayside and Dundee City Council. He agrees that the <i>Memorandum of Understanding</i> combined with the sample agreement supports the aspiration of the Tayside Data Sharing group quoted above.</p> <p>Therefore, the Keeper can agree that Dundee City Integration Joint Board properly considers records governance when undertaking information sharing programmes.</p>
15. Public records created or	<b>N/A</b>	<b>N/A</b>	<p><b><u>Third Parties:</u></b></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>This is recognised by the IJB the <i>RMP</i> states: "The plan also covers records created and held by any third party performing a function on behalf of Dundee City Integration Joint Board" (<i>RMP</i> page 4) and "The IJB will therefore follow procedures that aim to ensure that all of its officers, employees of constituent authorities supporting its work, contractors, agents, consultants and other trusted third parties who create public records on behalf of the authority" (<i>RMP</i> page 5).</p> <p>However, having correctly understood and considered this issue, the IJB has provided the Keeper with a clear statement that currently: "Dundee City IJB do not contract any of its statutory functions to a third-party, and therefor there are no records created by third parties carrying out the functions of a scheduled authority" (<i>RMP</i> page 25).</p> <p>Therefore, the Keeper agrees that this element does not currently apply to the IJB.</p>
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**Dundee City Integration Joint Board  
(‘The IJB’ in the assessment below)**

**Explanation: All public records of Dundee City Integration Joint Board are held on Dundee City 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 9) and in a *Covering Letter* from the Chief Officer of the IJB.**

**“I confirm that Dundee City Council creates, holds and manages the disposal of the IJB’s records..” (*Covering Letter from IJB CO* – see under General Comments below).**

**The Keeper agreed the *Records Management Plan* of Dundee City Council in March 2020:  
[Dundee City Council and Dundee City Licensing Board Assessment Report \(nrscotland.gov.uk\)](https://www.nrscotland.gov.uk/information/assessments/dundee-city-council-and-dundee-city-licensing-board)**

**General Notes on RMP, Including Concerns:**

**General Notes on submission:** This assessment is on the *Records Management Plan* (the *RMP*) of Dundee City Integration Joint Board as submitted to the Keeper of the Records of Scotland for his agreement on 27<sup>th</sup> September 2021. This is version 2.0 effective from 21<sup>st</sup> September 2021.

The submission to the Keeper includes a *Covering Letter* from Vicky Irons, Chief Officer Dundee Health and Social Care Partnership (see element 1 above) dated 23<sup>rd</sup> September 2021. This letter support the arrangements detailed in the explanation above. The submission also includes a *Scheme of Delegation for IJB Officers* (2019) (which clarifies the remit and responsibilities of the Chief Officer), the *Dundee Health and Social Care Integration Scheme* (2018 update), the *IJB Registration with the Information*

*Commissioner* (see element 9) and a draft version of the *Information Sharing Overarching Memorandum of Understanding* between Dundee Integration Joint Board, NHS Tayside and Dundee City Council.

In the introduction to the *RMP* (page 4) the IJB states that:

“By establishing effective records management arrangements there will be significant benefits for the IJB– for example it will help to:

- Increase efficiency and effectiveness, delivering savings in administration costs
- Improve and develop service delivery
- Achieve business objectives and targets
- Ensure compliance with the Public Records (Scotland) Act 2011 and other legislative requirements, standards and codes of conduct
- Support transparency and open government
- Improve the security of personal and confidential information”

The Keeper fully agrees with this assessment of the business advantages of robust records management.

The *RMP* mentions the Act and is based on the Keeper’s, 15 element, Model Plan <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 Dundee City Integration Joint Board. Policies and governance structures are in place to implement the actions required by the plan.

Elements that require development by Dundee City Integration Joint Board are as follows

- 4. Business Classification
- 5. Retention schedule
- 6. Destruction
- 7. Archiving and Transfer
- 11. Audit trail

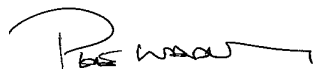
**The Keeper acknowledges that these elements require improvement action on the part of the authority on whose systems the IJB's public records are managed rather than by the IJB.**

## 7. Keeper's Determination

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

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



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