

Public Records (Scotland) Act 2011

NHS Western Isles

The Keeper of the Records of Scotland

8 December 2017

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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 NHS Western Isles by the Public Records (Scotland) Act 2011 Assessment Team following its submission to the Keeper on 2 June 2016.

The assessment considered whether the RMP of NHS Western Isles was developed with proper regard to the 14 elements of the Keeper's statutory Model Records Management Plan (the Model Plan) under section 8(3) of the Act, and whether in this respect it complies with it and the specific requirements of the Act.

The outcome of the assessment and the Keeper's decision on whether the RMP of NHS Western Isles complies with the Act can be found under section 7 of this report with relevant recommendations.

3. Authority Background

NHS Western Isles (otherwise known as Western Isles Health Board) is the organisation responsible for providing healthcare to the population of the Western Isles, which is made up of approximately 26,500 people. They employ around 1030 staff. As a Health Board, their overall purpose is:

'to protect, promote and improve the health and wellbeing of the Western Isles population and to ensure the reliability and delivery of sustainable and safe healthcare and services'.

Other roles of NHS Western Isles include:

Promoting and safeguarding high standards of care;

Assessment Report

Focusing clearly on patient safety, health outcomes, and improving patients' experiences of NHS services;

Promoting community planning by working closely with other local statutory and voluntary organisations;

Informing, engaging, and consulting with the public in the design, delivery and evaluation of healthcare services;

Allocating resources to address local and national priorities;

and Achieving the targets in the Health Board's Local Delivery Plan.

NHS Western Isles works alongside mainland Health Boards and other local organisations, including the local authority and third sector (voluntary) organisations, to provide a wide range of healthcare services to the local population. Where possible, services are provided locally, in the Western Isles, but for specific procedures and more specialist services, we work with mainland partners to provide services in other areas.

<http://www.wihb.scot.nhs.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 NHS Western Isles' 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

Element	Present	Evidence	Notes
<p>1. Senior Officer <i>Compulsory element</i></p>	<p>G</p>	<p>G</p>	<p>NHS Western Isles have identified Gordon Jamieson, Chief Executive, as the individual with overall responsibility for records management in the authority.</p> <p>This is confirmed by a <i>Covering Letter</i> from Mr. Jamieson dated 31st May 2016.</p> <p>Mr. Jamieson is also the Board's 'Senior Information Risk Owner' (<i>Information Governance Policy</i> section 4.2.1) and 'Accountable Officer' (section 5.1).</p> <p>The identification of the Chief Executive to this role reflects statements in the Board's <i>Information Governance Policy</i> (for example section 5.1) and <i>Records Management Policy</i> (section 4). The overall responsibility of the Chief Executive is also supported by principles in the <i>Scottish Government Records Management NHS Code of Practice (Scotland)</i>: http://www.gov.scot/Resource/Doc/366562/0124804.pdf</p> <p>Mr. Jamieson is the 'Corporate Owner' of the <i>Records Management Plan</i> (the <i>Plan</i>).</p> <p>The Chief Executive chairs the Board's Corporate Management Team (see element 13). The Corporate Management Team have approved all policies submitted as evidence.</p> <p>The Keeper agrees that NHS Western Isles have identified an appropriate individual to this role as required by the Act.</p>

<p>2. Records Manager <i>Compulsory element</i></p>	<p>G</p>	<p>G</p>	<p>NHS Western Isles has identified Carol Macdonald, Information Governance Manager, as the individual with day-to-day responsibility for implementing the <i>Plan</i> in the authority.</p> <p>The input of the Information Governance Manager is confirmed in a <i>Covering Letter</i> from Mr Jamieson (see element 1) which accompanies the <i>Plan</i>.</p> <p>The identification of the Information Governance Manager as the individual with day-to-day responsibility for records management is supported by statements in the <i>Information Governance Policy</i> (section 4.2.1) and the <i>Records Management Policy</i> (section 4).</p> <p>Ms. Macdonald is also responsible for monitoring the development of the Business Classification Scheme (see element 4) and as such will be of central importance to the records management provision in the authority going forward.</p> <p>The Information Governance Manager is responsible for NHS Western Isles response to subject access requests (see element 9) and for monitoring the transfer of records outwith the Board under information sharing agreements.</p> <p>The Keeper agrees that NHS Western Isles have identified an appropriate individual to this role as required by the Act.</p>
<p>3. Policy <i>Compulsory element</i></p>	<p>G</p>	<p>G</p>	<p>NHS Western Isles have a <i>Records Management Policy</i> (The <i>Policy</i>) which has been provided to the Keeper (version 2 approved by the Information Governance Steering Group in October 2015).</p> <p>They also have an <i>Information Governance Policy</i> which has been provided to the Keeper (version 3 approved by the Information Governance Steering Group in August 2015).</p>

			<p>The Keeper agrees that the Plan supports the objectives of the <i>Policy</i> and the <i>Information Governance Policy</i>.</p> <p>A screen-shot has been provided as evidence that policies are available on the NHS Western Isles intranet.</p> <p>The Keeper agrees that NHS Western Isles have a records management policy statement as required by the Act.</p>
<p>4. Business Classification</p>	<p>A</p>	<p>G</p>	<p>The <i>Records Management Policy (see element 3)</i> states that “The aims of our Records Management System are to ensure that.... records and the information within them can be located and displayed in a way consistent with its initial use...” (<i>Policy</i> section 3.1).</p> <p>The <i>Plan’s</i> actions against this element sets out the aim of developing and rolling-out a <i>Business Classification Scheme (Plan</i> page 6).</p> <p>To this end, NHS Western Isles are developing a three level <i>Classification Scheme</i> based on its statutory functions and drawing on the processes developed by NHS NSS and other NHS Boards. This work will be lead by the Information Governance Manager (see element 2) and monitored by the Information Governance Steering Group (see under General Comments below). The roll-out of a full <i>Business Classification Scheme</i> will be in association with local service areas. The Keeper commends the inclusion of local business units in the development of a <i>Business Classification Scheme</i>.</p> <p>This work is a key programme for the authority and fundamental to future records management provision. The Keeper will request updates as the project progresses.</p>

			<p>pictorial model and a draft user's guide. He thanks NHS Western Isles for providing this evidence of the authority's commitment to the project.</p> <p>The <i>Business Classification Scheme</i> will be based on the functions of NHS Western Isles. This must remain a business decision for an authority but the Keeper acknowledges that a <u>functional</u> scheme is currently considered best practice.</p> <p>The Keeper agrees that, with an organisation the size of NHS Western Isles, it is inevitable that progress will be made on an incremental basis. However, the Keeper will expect to see continual progress over the next year or so.</p> <p>The Keeper agrees this element of NHS Western Isles' records management plan under 'improvement model' terms. This means that the authority has identified a gap in provision (a full business classification scheme has yet to be rolled-out in the organisation) and have put measures in place to close that gap. The Keeper's agreement is conditional on him receiving updates as the BCS project progresses.</p>
5. Retention schedule	G	G	<p>NHS Western Isles have full <i>Retention Schedules</i> for clinical and for administrative records.</p> <p>These are based on the <i>Scottish Government NHS Code of Practice</i> published at http://www.gov.scot/Publications/2012/01/10143104/0.</p> <p>Staff instructions on operating the <i>Schedule</i> are supplied in the <i>Records Management Policy</i> (section 3.4, supplemented by Appendix 1) which has been supplied to the Keeper (see element 3). An example from the <i>Code of Practice</i> is that cancer records are kept for 30 years and then destroyed (clinical) and boiler inspection reports are kept for 2 years after the lifetime of the boiler (administration).</p> <p>NHS Western Isles note in the <i>Plan</i> that the current (2012) <i>Code of Practice</i> is</p>

			<p>under review and commit to adopting the new version when available.</p> <p>The Keeper agrees that NHS Western Isles have an approved and operational retention schedule that covers the expected record types created by a territorial health board.</p>
<p>6. Destruction Arrangements <i>Compulsory element</i></p>	<p>A</p>	<p>G</p>	<p>NHS Western Isles' <i>Information Governance Policy</i> (see element 3) makes a policy statement (section 4.2.7) that the Board will dispose of records "safely at the appropriate time.."</p> <p>To this end the authority has the following procedures in place:</p> <p>1. Hardware: The <i>Information Security Policy</i> (see element 8) shows that the IM&T and eHealth Manager is responsible for ensuring that in NHS Western Isles "All information is securely removed and appropriately destroyed before equipment is re-allocated or sent for secure disposal/destruction." (<i>Information Security Policy</i> page 4)</p> <p>Records held on redundant hardware, such as hard drives, are destroyed by an external contractor. The Keeper has been provided with a confirmation e-mail of this arrangement and with staff guidance on the issue.</p> <p>2. Back-Ups: NHS Western Isles, quite properly, back-up electronic records for business continuity purposes. They have provided the Keeper with an explanation of the back-up cycle and the retention of backed-up records.</p> <p>3. Electronic: The controlled and systematic deletion of records held on shared drives is a particular area of difficulty for many public authorities and the Keeper welcomes the acknowledgement of this. He agrees that the suggested improvements in records management (see element 4) the Authority is</p>

			<p>considering are a reasonable response to these difficulties and will go some way to assisting in the managed destruction of electronic records. Therefore, the Keeper accepts these statements as grounds for agreeing this element under improvement model terms.</p> <p>4. <u>Paper (Internal)</u>: Paper records held in house are destroyed using local shredders or, on an ad-hoc basis, an external contractor. Evidence in the form of a invoice has been supplied showing that the use of external contractors is in operation in the service.</p> <p><u>Paper (External)</u>: There is no evidence that NHS Western Isles currently use an outside contractor to store records.</p> <p>The Keeper can agree this element on an ‘improvement model’ basis. This means that the authority has identified a gap in provision (the destruction of electronic records held on shared drives) and has shown a commitment to closing this gap. The agreement is conditional upon the Keeper being kept informed of progress in this area.</p>
<p>7. Archiving and Transfer <i>Compulsory element</i></p>	<p>G</p>	<p>G</p>	<p>NHS Western Isles have selected Western Isles Council Archive Service (CnES) as the proper repository for records selected for permanent preservation. There is an arrangement whereby CnES take NHS records of historical interest.</p> <p>A formal agreement between the Council Archive, Tasglann nan Eilean, has been provided to the Keeper as evidence that these arrangements are operational.</p> <p>The identification of Western Isles Council is confirmed internally by minutes of the Information Governance Steering Group (see under General Comments below) dated May 2014 which state “CNES are going to have a records store and have</p>

			<p>offered NHS WI space, therefore Mr Yates [previous Information Governance Manager] will set up a meeting with CNES, Mr Smith and himself to discuss further.” The Keeper agrees that, since submission, this action appears to have completed.</p> <p>The Keeper agrees that NHS Western Isles has proper arrangements in place for the archiving of its records as required by the Act.</p>
8. Information Security <i>Compulsory element</i>	G	G	<p>NHS Western Isles have an <i>Information Security Policy</i> which has been provided to the Keeper. This is version 2 created March 2013.</p> <p>The <i>Information Security Policy</i> is supported by a suite of security policies and staff guidance such as their <i>Acceptable Use of Information Technology</i> (also supplied to the Keeper as a sample) and <i>Protective Marking Policy</i> (not supplied).</p> <p>A screen-shot has been provided as evidence that policies are available on the NHS Western Isles intranet.</p> <p>The Keeper agrees that NHS Western Isles have current arrangements in place to ensure that records are held securely as required by the Act.</p>
9. Data Protection	G	G	<p>NHS Western Isles do not operate a separate <i>Data Protection Policy</i>. Data protection provision features in the <i>Information Governance Policy</i> (section 4.2.2 and Appendix 1) (see element 3).</p> <p>The <i>Information Governance Policy</i> and the <i>Information Security Policy</i> (see element 8) specifically mentions the Data Protection Act 1998.</p> <p>The <i>Information Governance Policy</i> explains the (current) 8 principles of data protection in detail.</p>

			<p>The authority is registered with the Information Commissioner: Z7320675</p> <p>Subject access information is made available through a leaflet/request form which has been shared with the Keeper.</p> <p>Staff responsibilities regarding subject access requests is explained in the <i>Information Governance Policy</i>. The Information Governance Manager (see element 2) is responsible for NHS Western Isles response to subject access requests.</p> <p>The Keeper agrees that NHS Western Isles have appropriately considered their responsibilities under the Data Protection Act 1998.</p>
<p>10. Business Continuity and Vital Records</p>	<p>A</p>	<p>G</p>	<p>NHS Western Isles have implemented <i>Business Continuity Plans</i> for their service areas and a sample of one such has been provided to the Keeper. He agrees that this sample includes the recovery of records.</p> <p>The <i>Information Security Policy</i> (see element 8) shows that the IM&T and eHealth Manager is responsible for ensuring that in NHS Western Isles “Back-up and recovery procedures are in place to assist in contingency arrangements to support business continuity.” (<i>Information Security Policy</i> page 4). Further details are provided in the <i>Information Security Policy</i> sections 4.3 (page 8) and 5 (page 10).</p> <p>However, the <i>Plan</i> states (page 13) “NHS WI has not previously made any separate provision for vital records...we will initiate a programme of vital record identification coupled with evaluation of protection....particular attention to be paid to manual records not protected by frequent backup”. The Keeper agrees this ‘action’.</p>

			<p>The Keeper agrees that the developments explained under element 4 may help the formal logging of record types as ‘vital’ against a business classification structure.</p> <p>A screen-shot has been provided as evidence that policies are available on the NHS Western Isles intranet. However, see <u>Document Versions</u> under General Comments below.</p> <p>The Keeper agrees this element of NHS Western Isles records management plan under ‘improvement model’ terms. This means that he acknowledges that the authority have identified a gap in provision (identification of vital records is incomplete), but agrees that they have instigated a programme that will close that gap. The Keeper’s agreement is conditional on his being updated as this project progresses.</p>
11. Audit trail	A	G	<p>See element 4</p> <p>The <i>Plan</i> states (page 14): “NHS WI does not currently have formal recording procedures/audit trails for most of its corporate records...NHS WI will continue with the implementation of its DMS, including the application of audit functionality to corporate records”. The Keeper agrees this ‘action’.</p> <p>The authority also intends to “formalise manual audit or “registry” type controls for paper records” (<i>Plan</i> page 14/15). The Keeper agrees this ‘action’.</p> <p>The Keeper agrees that the creation of a central document management system is likely to greatly improve provision in this element.</p> <p>The Keeper also agrees that line of business systems operated by the authority</p>

			<p>(particularly in clinical areas) have tracking functionality. Examples have been provided to the Keeper showing how these appear in practice (eMRec and TOPAS).</p> <p>The Keeper agrees this element of NHS Western Isles records management plan under ‘improvement model’ terms. This means that he acknowledges that the authority have identified a gap in provision (tracking of records, particularly corporate records, is unsatisfactory), but agrees that they have instigated a programme that will close that gap. The Keeper’s agreement is conditional on his being updated as this project progresses.</p>
<p>12. Competency Framework for records management staff</p>	<p>G</p>	<p>G</p>	<p>NHS Western Isles have provided the Keeper with the <i>Job Description</i> of the Information Governance Manager. This shows responsibility for records management provision in the authority: “To lead the assessment, development, implementation and evaluation of systems, policies, procedures and training to ensure that NHS Western Isles fulfils its obligations and statutory requirements in relation to information governance. “</p> <p>Specifically, as explained in the <i>Plan</i>, the <i>Job Description</i> clearly identifies Ms. Macdonald as the officer responsible for areas of work that fall under PRSA.</p> <p>Details of the training and experience of the Information Governance Manager has been included in the <i>Plan</i>. The Keeper has viewed the <i>Personal Development Plan</i> and agrees section 2 is especially relevant to implementing the <i>Plan</i> going forward. The Keeper thanks Ms Macdonald for sharing this document with him.</p> <p>It is a principle of the <i>Information Governance Policy</i> (section 2) that NHS Western Isles will ensure that they implement “a system of training and awareness that meets government mandatory requirements, is role based, assessed and capable of equipping staff with the skills and knowledge necessary to discharge their responsibilities, under all of the appropriate Legislative and Nationally Mandated</p>

			<p>Information Governance Improvement plans and Information Security Frameworks.”</p> <p>This objective is supported by NHS National Education Scotland (NES) as explained by a statement in the <i>Plan</i> (page 15): “NES operates adequate CPD arrangements for all staff, including its information and records professionals”.</p> <p>NHS Western Isles commit to utilising NHS Scotland Information Governance Competency Framework: http://www.nes.scot.nhs.uk/media/584116/information_governance_in_nhsscotland_competency_framework.pdf</p> <p>Aside from the above external provision, the Board’s <i>Information Security Policy (see element 8)</i> shows that the IM&T and eHealth Manager is responsible for “Developing IT Security awareness training material to ensure that all staff are aware of their responsibilities and accountability for information security.” (<i>Information Security Policy</i> page 4).</p> <p>The Keeper has been provided with samples of training, both external (NES Safe Information Handling) and internal (NHS Western Isles IG Induction Training Presentation).</p> <p>The Keeper agrees that NHS Western Isles have ensured that the individual identified at element 2 has the required authority and skills to implement the <i>Plan</i>. They also consider training opportunities for other members of staff when appropriate.</p>
<p>13. Assessment and Review</p>	<p>G</p>	<p>G</p>	<p>The Act requires a scheduled public authority to “keep its records management plan under review” (part 1 5.1 (a)).</p> <p>NHS Western Isles’ <i>Records Management Plan</i> is scheduled for review before</p>

			<p>March 2017 (<i>Plan</i> page 16).</p> <p>The review will be carried out by the Information Governance Group (see under General Comments below). This group reports to the Corporate Management Team.</p> <p>The methodology to be followed in these reviews is explained in the <i>Records Management Policy</i> section 3.5 ‘Records Management System Audit’ (see element 3).</p> <p>The Keeper also acknowledges that policies and procedures submitted in evidence have review periods included in their control sheets and commends this:</p> <p>The <i>Information Security Policy</i> is due for review by March 2017.</p> <p>The <i>Records Management Policy</i> and the <i>Information Governance Policy</i> (see element 3) are both due for review by October 2017.</p> <p>NHS Western Isles’ registration with the Information Commissioner must be renewed by December 2016.</p> <p>The Keeper agrees that NHS Western Isles have arrangements in place to review their RMP as required by the Act. Furthermore he acknowledges that key information governance documents have appropriate review periods allocated to them.</p>
14. Shared Information	G	G	<p>“The duty to share information can be as important as the duty to protect patient confidentiality” (Caldicott principle 7 https://nhsnss.org/pages/corporate/caldicott_guardians.php)</p>

			<p>It is a principle of the Board's <i>Information Governance Policy</i> that: "NHS Western Isles may share information...with other public bodies – where it is lawful and in the patients or public interest to do so – for the purpose of facilitating the exercise of the public functions..." (<i>Information Governance Policy</i> section 4.2.4).</p> <p>When pursuing its functions it is vital that NHS Western Isles can share information with third parties (such as Social Work departments or Police Scotland). However, it is important that it can do so securely and that information governance is considered at the outset of any information sharing agreement.</p> <p>NHS Western Isles enters into data sharing agreements using the Scottish Accord for the Sharing of Personal Information (SASPI). A copy of the Accord has been submitted as evidence as has a sample protocol</p> <p>The Keeper agrees that NHS Western Isles properly consider information governance when entering into arrangements to share information with third parties.</p>
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NHS Western Isles

General Notes on RMP, Including Concerns:

Version: This assessment is on the *Records Management Plan* (the *Plan*) of NHS Western Isles v1.1 dated September 2017.

The *Plan* contains an 'action plan' section against each element. The Keeper agrees this action plan appears robust and the targets reasonable.

The *Plan* is accompanied by a *Covering Letter* of endorsement from the Chief Executive (**see element 1**) who personally approved it.

The *Plan* mentions the Act and is based on the Keeper's, 14 element, Model Plan <http://www.nrscotland.gov.uk/record-keeping/public-records-scotland-act-2011/resources/model-records-management-plan>.

The Keeper has been provided with minutes from the Corporate Management Team Meeting 19th January 2016 showing that the submission of the *Records Management Plan* has been acknowledged at the highest level in the organisation. See also: <http://www.wihb.scot.nhs.uk/publications/annual-reports?task=document.viewdoc&id=2099> for report on the process to the Board by Dr Watts who is Director of Public Health, Caldicott Guardian and Chair of the Information Governance Steering Group (**see below**).

A draft version of the *Records Management Plan* is available at <http://www.wihb.scot.nhs.uk/publications/annual-reports?task=document.viewdoc&id=2098>. **The Keeper assumes that this will be replaced with the current version on agreement.**

Third Parties: The Act makes it clear that records created by a contractor in carrying out a scheduled authority's functions are public records (Part 1 section 3.1 (b)).

At several points the policies submitted in evidence correctly indicate that clauses therein apply to third parties who may be carrying out the functions of NHS Western Isles under contract such as private hospitals or 'mainland partners' (for example Information Security Policy 3.5 and 3.9).

NHs Western Isles state (*Plan* page 8):

"Patients from NHS W Isles may be sent to other NHS hospitals for healthcare. NHS WI is satisfied these hospitals take records governance seriously and to the same standard as NHS Western Isles. they are scheduled public authorities and are therefore also bound by the requirements of the Public Records (Scotland) Act 2011."

Information Governance Steering Group

The Information Governance Steering group was created to: "Provide direction to, and oversee the development of, NHS Western Isles Information Governance initiatives and policies, reporting to the Board through the Corporate Management Team." (*Information Governance Policy* Appendix 2).

The group meets six times a year.

The Group is responsible for developing standards of good practice in information management and ensuring that Information Governance is embedded in the business planning, service management and risk management agendas." (*Information Governance Policy* Appendix 2). The Keeper commends these objectives.

The Group also has a responsibility to ensure "that education, training and awareness programmes are in place" (*Information Governance Policy* Appendix 2).

This group is clearly of fundamental importance to records management in the authority and the Keeper thanks NHS Western Isles for including information about its work in their submission.

6. Keeper's Summary

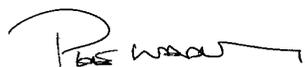
Elements 1 - 14 that the Keeper considers should be in a public authority records management plan have been properly considered by NHS Western Isles. Policies and governance structures are in place to implement the actions required by the plan.

7. Keeper's Determination

Based on the assessment process detailed above, the Keeper **agrees** the RMP of NHS Western Isles.

- The Keeper recommends that NHS Western Isles 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

.....
Robert Fotheringham
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 NHS Western Isles. In agreeing this RMP, the Keeper expects NHS Western Isles to fully implement the agreed RMP and meet its obligations under the Act.



.....
Tim Ellis
Keeper of the Records of Scotland