

Public Records (Scotland) Act 2011

Western Isles Integration Joint Board (Cùram Is Slàinte nan Eilean Siar)

The Keeper of the Records of Scotland

24th March 2023

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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 Western Isles Integration Joint Board (Cùram Is Slàinte nan Eilean Siar) by the Public Records (Scotland) Act 2011 Assessment Team following its submission to the Keeper on 9th April 2021.

The assessment considered whether the RMP of Western Isles Integration Joint Board (Cùram Is Slàinte nan Eilean Siar) 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 Western Isles Integration Joint Board (Cùram Is Slàinte nan Eilean Siar) complies with the Act can be found under section 7 of this report with relevant recommendations.

3. Authority Background

The Western Isles Integration Joint Board was established in April 2016. It is a partnership between Comhairle nan Eilean Siar and NHS Western Isles, along with third and independent sector providers of health and social care. The Integration Joint Board is responsible for planning and funding a range of health and social care services, including GPs, dentistry, social care, community nursing, social work, community health services and some hospital services such as A&E.

The IJB's Strategic Plan is at: [6_6_1 - Strategic Plan - 2020-21_IJB_24-09-20.pdf \(ijbwesternisles.scot\)](#)

IJB Website: [Home :: Cùram Is Slàinte nan Eilean Siar \(ijbwesternisles.scot\)](#)

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 Western Isles Integration Joint Board (Cùram Is Slàinte nan Eilean Siar)'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

Western Isles Integration Joint Board (Cùram Is Slàinte nan Eilean Siar) (‘The IJB’ in the assessment below)

Explanation: All public records of Western Isles Integration Joint Board are held on NHS Western Isles systems and, as this is the case, the IJB must adopt the records management provision of the health board. This is made clear in the *Records Management Plan* (for example under element 3).

The *RMP* has been reviewed and signed by the Interim Chair of NHS Western Isles (*Covering Letter from Chief Officer*) as confirmation of this arrangement.

**The Keeper agreed the *Records Management Plan* of NHS Western Isles in December 2017:
[Assessment Reports - NHS Western Isles \(nrscotland.gov.uk\)](https://www.nrscotland.gov.uk/assessment-reports-nhs-western-isles)**

Element	Present	Evidence	Notes
1. Senior Officer	G	G	<p>The Public Records (Scotland) Act 2011 (the Act) requires that an authority identifies an individual senior staff member as holding corporate responsibility for records management.</p> <p>Western Isles Integration Joint Board (the IJB) have identified Nick Fayers, Chief Officer as the individual with overall responsibility for records management in the authority.</p> <p>This is supported by a <i>Covering Letter</i> from Mr Fayers which has been provided to the Keeper.</p> <p>Mr Fayers is the corporate 'Owner' of the <i>Records Management Plan</i> (the <i>RMP</i>) which he has signed, along with the Chair of NHS Western Isles.</p> <p>The Keeper agrees that Western Isles Integration Joint Board have identified an appropriate individual to this role as required by the Public Records (Scotland) Act 2011 (the Act).</p>
2. Records Manager	G	G	<p>The Act requires that each authority identifies an individual staff member as holding operational responsibility for records management and has appropriate corporate responsibility, access to resources and skills. The Keeper has agreed that, due to the partnership nature of an integration joint board, two individuals may be identified under this element.</p> <p>Western Isles Integration Joint Board have identified Carol MacDonald, Information Governance Manager, of NHS Western Isles, as one of two individuals that have day-to-day responsibility for implementing the <i>RMP</i> in the authority.</p>

			<p>All the public records of the IJB are stored and managed digitally on NHS Western Isles systems (see explanation above and element 4 below). Ms MacDonald is the board's records manager and as such has full access to the IJB's public records. In 2017 the Keeper agreed that Ms MacDonald was a suitable individual to take on this role for NHS Western Isles.</p> <p>Western Isles Integration Joint Board have also identified Michelle McPhail, Corporate Business Manager for the IJB as having responsibility for implementing the <i>RMP</i>.</p> <p>The Corporate Business Manager is the author/owner of the <i>RMP</i>.</p> <p>The IJB have supplied the Keeper with a copy of the Corporate Business Manager's job description. He acknowledges that it includes the following objective: "The postholder has a responsibility to support the Western Isles Integration Joint Board as a Business Manager, in the day-to-day responsibility for the implementation of the Records Management Plan."</p> <p>The Keeper has received confirmation of the arrangement, explained above, from Ms MacDonald in which she also commits to liaise with the IJB Corporate Business Manager regarding any relevant review of records management provision in the health board.</p> <p>The Keeper agrees that Carol MacDonald and Michelle McPhail are appropriate individuals to be identified to this role.</p>
3. Policy	G	G	The Act requires an authority to have an appropriate policy statement on records management.

			<p>All the public records of Western Isles IJB are held digitally on the record-keeping systems of NHS Western Isles (with working copies provided to Western Isles Council for publication) (see element 4 below).</p> <p>The staff creating and managing the public records of Western Isles IJB are employees of NHS Western Isles.</p> <p>The IJB has therefore adopted the <i>Records Management Policy</i> of NHS Western Isles for their records. The Keeper agrees this is appropriate.</p> <p>In December 2017 the Keeper agreed that the <i>Records Management Policy</i> of NHS Western Isles was appropriate for the management of public records in an authority.</p> <p>The Keeper agrees that Western Isles Integration Joint Board have adopted a suitable records management policy statement as required by the Act.</p>
4. Business Classification	A	G	<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 recognises this. They state in the introduction to the <i>RMP</i> that "Effective records management involves efficient and systematic control of the creation, storage, retrieval, maintenance, use and disposal of records, including processes for capturing and maintaining evidence." And that "The guiding principles of records management are to ensure that information is available when and where it is needed, in an organised and efficient manner, and in a well maintained environment"</p> <p>All the public records of Western Isles IJB are held digitally on the record-keeping structure of NHS Western Isles. The IJB have provided the Keeper with a copy of the NHS Western Isles file plan which clear shows that it includes the records of the</p>

			<p>IJB.</p> <p>Working copies of the IJB output are provided to Comhairle nan Eilean Siar (Western Isles Council) for publication. The <i>RMP</i> explains that “Appropriate corporate records associated with the IJB are published externally, via CnES, available from the IJB website held on the Comhairle nan Eilean Siar [server”. The <i>RMP</i> commits the IJB to inform the relevant officer of the Council to any amendment to arrangements. The Keeper is satisfied that the council website is used for publication and public access only and that the IJB’s public records are created and managed on NHS servers.</p> <p>The Keeper recognises that currently NHS Western Isles are consolidating their records management provision around an M365 cloud solution. This is confirmed in the IJB <i>RMP</i> under element 8. At the time of their last communication with the Keeper, the health board stated that this element “remains in development alongside the implementation of [our] document management system.” It is assumed that the public records of the IJB will transition to M365 alongside the records of the board. IJB records will no longer be held on shared drives for example. This is appropriate and not a cause for concern.</p> <p>However, the Keeper has determined that the RAG status of a <i>Records Management Plan</i> of any authority, whose records are managed on the systems of a separate authority, cannot be higher than that awarded to the ‘host’ authority. As noted above, NHS Western Isles is in a transition period and carries an amber status against this element.</p> <p>The Covering Letter from the IJB Chief Officer acknowledges this issue where he states “Where we cannot report full compliance against specific Elements, we plan to address these in accordance with our parent bodies – NHS Western</p>
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			<p>Isles....” (see also elements 6 and 11)</p> <p>With this in mind, the Keeper is able to agree element 4 of the IJB plan on the same ‘improvement model’ terms as the health board.</p>
<p>5. Retention schedule</p>	<p>G</p>	<p>G</p>	<p>The Keeper expects an authority to have allocated retention periods to its public records and for those records to be retained and disposed of in accordance with the a Retention Schedule.</p> <p>The public records created by the IJB, both those relating to the administration of the board and those representing the output from the work of the board, are managed on the record- keeping systems of NHS Western Isles and have retention decisions applied to them according to the nationally agreed standard <i>Scottish Government Records Management Health and Social Care Code of Practice (2020)</i>: https://www.informationgovernance.scot.nhs.uk/wp-content/uploads/2020/06/SG-HSC-Scotland-Records-Management-Code-of-Practice-2020-v20200602.pdf</p> <p>The <i>RMP</i> confirms that "All corporate records are held on the NHS Western Isles server and are held in line with the NHS Western Isles Records Destruction and Retention Policy, based on the Scottish Government NHS Code of Practice."</p> <p>The Keeper was involved in the review of the <i>Code of Practice</i> and endorses it as appropriate as a guide to the application of retention decisions for all public records managed on NHS systems.</p> <p>As the <i>RMP</i> acknowledges the <i>Code of Practice</i>, the Keeper can be satisfied that the IJB is aware of the retention decisions applied to their public records.</p> <p>The Keeper agrees that Western Isles IJB has ensured that their public records are subject to an appropriate retention schedule.</p>

<p>6. Destruction Arrangements</p>	<p>A</p>	<p>G</p>	<p>The Act requires that public records are destroyed in a timely, controlled and secure manner.</p> <p>The IJB recognises this. They state in the introduction to the <i>RMP</i> that "Effective management of information allows fast, accurate and reliable access to records, ensuring the <u>timely destruction of redundant information</u> and the identification and protection of vital and historically important records. Effective records management involves efficient and systematic control of the creation, storage, retrieval, maintenance, use <u>and disposal of records</u>, including processes for capturing and maintaining evidence."</p> <p>The public records of the IJB are held on the record keeping systems of NHS Western Isles. The <i>RMP</i> confirms that "Corporate documents belonging to the IJB are held electronically on the NHS Western Isles server... All aspects of destruction of all formats of records is adhered to in compliance with the parent body." The Keeper agrees this is appropriate.</p> <p>However, in December 2017 NHS Western Isles was graded with an amber RAG status by the Keeper for this element with his comment "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 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>As with element 4 above, the Keeper has determined that the RAG status of a</p>
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			<p>Records Management Plan of any authority, whose records are managed on the systems of a separate authority, cannot be higher than that awarded to the ‘host’ authority.</p> <p>Therefore, the Keeper agrees this element on the same ‘improvement model’ terms as the health board.</p>
7. Archiving and Transfer	G	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>The IJB recognises this. They state in the introduction to the <i>RMP</i> that "Effective management of information allows fast, accurate and reliable access to records, ensuring the timely destruction of redundant information and the identification and protection of vital and historically important records."</p> <p>The <i>RMP</i> under element 7 confirms: "The IJB recognizes that records created by the IJB have enduring value and historical evidence and as such are required to be archived appropriately."</p> <p>The public records of the IJB, identified as suitable for permanent preservation using the <i>NHS Code of Practice</i> (see element 5) will be transferred to Tasglann nan Eilean (the Western Isles archive service in Stornoway): Tasglann nan Eilean Siar :: Hebridean Archives :: Homepage - Hebridean Archives</p> <p>NHS Western Isles have formal agreement with Tasglann nan Eilean which has been shared with the Keeper. The Keeper suggests that, it would be useful if future revisions of the MoU mentioned the IJB records specifically. This should be followed up with the archive service.</p>

			<p>As the <i>RMP</i> acknowledges the <i>Code of Practice</i>, the Keeper can be satisfied that the IJB is aware of the preservation decisions applied to their public records.</p> <p>The Keeper agrees that Western Isles Integration Joint Board has arrangements in place to properly archive records when appropriate.</p>
8. Information Security	G	G	<p>The Act requires that public records are held in accordance with information security compliance requirements.</p> <p>The IJB recognises this. They state in the introduction to the <i>RMP</i> that "Effective management of information allows fast, accurate and reliable access to records, ensuring the timely destruction of redundant information and the identification and <u>protection</u> of vital and historically important records."</p> <p>The public records of Western Isles IJB are managed digitally on the record-keeping systems of NHS Western Isles. Therefore the IJB is reliant on the information security provision of the health board. In 2017 the Keeper agreed that this was appropriate under PRSA requirements.</p> <p>All IJB staff managing records are employees of NHS Western Isles and are personally subject to the security policies and mandatory training of the health board.</p> <p>The Keeper agrees that Western Isles Integration Joint Board have procedures in place to appropriately ensure the security of their records as required by the Act.</p>
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>Western Isles IJB are a data controller under DP 2018. As such they have registered with the Information Commissioner’s Office: Information Commissioners - Data protection register - entry details (ico.org.uk)</p> <p>The <i>RMP</i> explains that the IJB has fully adopted the data protection provision of NHS Western Isles. This includes the Data Protection policy and Data protection Officer. The Keeper agrees that no personal information is controlled by the IJB outside the record-keeping systems of NHS Western Isles, and therefore the Keeper agrees this arrangement is appropriate.</p> <p>The Keeper agreed that the data protection provision in NHS Western Isles was appropriate in December 2017 and, although the legislation has changed since that date, he is satisfied that this is liable to remain compliant.</p> <p>NHS Western Isles data protection information is at: www.wihb.scot.nhs.uk/about-us/patient-privacy-notice/</p> <p>The Keeper agrees that Western Isles IJB have arrangements in place that allow them to properly comply with data protection legislation.</p>
<p>10. Business Continuity and Vital Records</p>	<p>A</p>	<p>G</p>	<p>The Keeper expects that record recovery, prioritising vital records, is an integral part of the authority’s business continuity planning.</p> <p>The public records of Western Isles IJB are managed on the record-keeping systems of NHS Western Isles and, as this is the case, the IJB must rely on the record recovery functionality applied to those systems. The Keeper agrees this is appropriate.</p> <p>The Keeper agreed the business continuity and record recovery provision in NHS Western Isles in December 2017.</p>

			<p>However, this agreement was under ‘improvement model’ terms as the health board was not fully compliant under this element. This recognised by the IJB who state in their <i>RMP</i> under this element: “Further review is required ... [for?] both organisations compliance.” As noted above, the Chair of the health board has endorsed the IJB <i>RMP</i>. In his <i>Covering Letter</i> the IJB Chief Officer (see element 1) notes that “Where we cannot report full compliance against specific Elements, we plan to address these in accordance with our parent bodies”. The Keeper accepts this statement refers to this element.</p> <p>As with elements 4 and 6 above the Keeper has determined that the RAG status of a <i>Records Management Plan</i> of any authority, whose records are managed on the systems of a separate authority, cannot be higher than that awarded to the ‘host’ authority.</p> <p>Therefore, the Keeper agrees this element on the same ‘improvement model’ terms as the health board.</p>
11. Audit trail	A	G	<p>The Keeper expects an authority to have process in place to track public records in such a way that their location is known and changes recorded.</p> <p>The IJB recognises this. They state in the introduction to the <i>RMP</i> that "Effective management of information allows <u>fast, accurate and reliable access to records</u>, ensuring the timely destruction of redundant information and the identification and protection of vital and historically important records. Effective records management involves efficient and systematic control of the creation, storage, <u>retrieval</u>, maintenance, use and disposal of records, including processes for capturing and maintaining evidence."</p> <p>The public records of Western Isles IJB are managed digitally on the record-keeping</p>

			<p>systems of NHS Western Isles. All staff managing IJB records are NHS Western Isles staff. Therefore they have appropriate access to these systems and are subject to the naming convention/version control policies of the health board when creating IJB records.</p> <p>Therefore, the IJB relies on the record tracking processes of NHS Western Isles. The Keeper agrees this is appropriate.</p> <p>In December 2017 the Keeper agreed this element of the health board’s <i>RMP</i>.</p> <p>However, he did so under ‘improvement model’ terms. He said in his report: “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.” Since 2017 the Keeper has not had an update from NHS Western Isles. However, he is aware that, along with other Scottish health boards NHS Western Isles will be transitioning to M365 as their record management system. This will bring with it a powerful e-discovery functionality that will inform the board’s ability to locate and identify records (it automatically applies version control). Until this transition is complete this element of the NHS Western Isles RMP is liable to remain as an ‘amber’ improvement model.</p> <p>This recognised by the IJB who state in their <i>RMP</i> under this element: “This is dependent upon NHS WI developing a Document Management System.” As noted above, the Chair of the health board has endorsed the IJB <i>RMP</i>. In his <i>Covering Letter</i> the IJB Chief Officer (see element 1) notes that “Where we cannot report full compliance against specific Elements, we plan to address</p>
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			<p>these in accordance with our parent bodies”. The Keeper accepts this statement refers to this element.</p> <p>As with other elements of the IJB plan, the Keeper has determined that the RAG status of a <i>Records Management Plan</i> of any authority, whose records are managed on the systems of a separate authority, cannot be higher than that awarded to the ‘host’ authority.</p> <p>Therefore, the Keeper agrees this element on the same ‘improvement model’ terms as the health board.</p>
<p>12. Competency Framework for records management staff</p>	<p>G</p>	<p>G</p>	<p>The Keeper expects staff creating, or otherwise processing records, to be appropriately trained and supported.</p> <p>The public records of Western Isles IJB are managed on the record-keeping systems of NHS Western Isles. In 2017 the Keeper agreed that the training provided to staff of the health board, including specifically the Information Governance Manager, was appropriate.</p> <p>All IJB staff managing records are employees of NHS Western Isles (The IJB does not employ staff directly) and, as this is the case, they have access to the health board’s training provision. For example the <i>RMP</i> notes specifically that NHS Western Isles provides training via eLearning pertaining to information security and confidentiality.</p> <p>As the IJB’s Corporate Business Manager (also identified at element 2) is an NHS Western Isles employee it can be taken that the training she is offered is suitable.</p> <p>The IJB note that Michelle McPhail has attended PRSA training sessions both in Stornoway and remotely. They commit to attending other relevant training</p>

			<p>as appropriate.</p> <p>The Keeper agrees that the individual identified at element 2 has the appropriate responsibilities, resources and skills to implement the records management plan. Furthermore, he agrees that the IJB consider information governance training for staff as required (through the training provision of NHS Western Isles).</p>
<p>13. Assessment and Review</p>	<p>G</p>	<p>G</p>	<p>Section 1(5)(i)(a) of the Act says that an authority must keep its RMP under review.</p> <p>The cover sheet of the <i>RMP</i> commits the IJB to an annual review of the plan and to submit a report on this review to the IJB Audit Committee for scrutiny. The responsibility for producing this report lies with the Corporate Business Manager (see element 2).</p> <p>In the <i>Covering Letter</i> submitted alongside the RMP the Chief Officer confirms that “The RMP will be presented to the IJB Audit Committee for scrutiny and the committee will continue to review future iterations of the Plan. In turn the Audit Committee Chair will provided assurance to the Integration Joint Board on compliance against the Act and its action plan.”</p> <p>As the public records of the IJB are managed on NHS Western Isles systems they rely to a great extent on the review mechanism operational in the health board. This is recognised in the IJB <i>RMP</i> which states “The Keeper will be advised of the position of the Partnerships’ RMP, majority of which will be depending upon the clarity of the progress within the Parent Body.” It is important therefore that a commitment to inform the IJB of the results of health board review is forthcoming. The intention to do this has been confirmed by the NHS Western Isles Information Manager.</p> <p>The Keeper agrees that Western Isles IJB has arrangements in place to review their</p>

			<i>RMP</i> as required by the Act.
14. Shared Information	G	G	<p>The Keeper expects a Scottish public authority to ensure that information sharing, both within the Authority and with other bodies or individuals, is necessary, lawful and controlled.</p> <p>As part of its function, Western Isles Integration Joint Board shares information with other bodies when appropriate.</p> <p>The output of the IJB is treated in the same manner as that of NHS Western Isles and shared under NHS Scotland’s procedures Microsoft Word - IS Toolkit- Introduction v1April2016.doc (scot.nhs.uk). The Keeper has previously endorsed the Toolkit and has agreed that NHS Western Isles properly consider information governance issues when undertaking information sharing activities.</p> <p>The IJB state that “No personal details of any patient / client or staff members will be shared unless absolutely necessary under the GDPR Act.” (see element 9).</p> <p>The Keeper can agree that Western Isles Integration Joint Board properly considers records governance when undertaking information sharing programmes.</p>
15. Public records created or held by third parties	N/A	N/A	<p><u>Third Parties:</u></p> <p>The Public Records (Scotland) Act 2011 (PRSA) makes it clear that records created by third parties when carrying out the functions of a scheduled authority should be considered ‘public records’ - PRSA Part 1 3 (1)(b).</p> <p>This is recognised by the IJB. However, they have provided the Keeper with a clear statement that currently: “Western Isles Integration Joint Board does not contract a</p>

			<p>third party to carry out the IJB's functions in relation to the creation or retention of records." (Statement supplied separately from the <i>RMP</i>).</p> <p>Therefore, the Keeper agrees that this element does not currently apply to the IJB.</p>
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**Western Isles Integration Joint Board (Cùram Is Slàinte nan Eilean Siar)
(‘The IJB’ in the assessment below)**

Explanation: All public records of Western Isles Integration Joint Board are held on NHS Western Isles systems and, as this is the case, the IJB must adopt the records management provision of the health board. This is made clear in the *Records Management Plan* (for example under element 3).

The *RMP* has been reviewed and signed by the Interim Chair of NHS Western Isles (*Covering Letter from Chief Officer*) as confirmation of this arrangement.

The Keeper agreed the *Records Management Plan* of NHS Western Isles in December 2017:
[Assessment Reports - NHS Western Isles \(nrscotland.gov.uk\)](https://www.nrscotland.gov.uk/assessment-reports-nhs-western-isles)

General Notes on submission: This assessment is on the *Records Management Plan* (the *RMP*) of Western Isles Integration Joint Board (the IJB) as submitted to the Keeper of the Records of Scotland (KRS) for his agreement on 9th April 2021. This is version 1 apparently approved by Nick Fayers, the Chief Officer (but see box in red below).

The *RMP* is accompanied by a *Covering Letter* from Nick Fayers (**see element 1**), endorsing the plan, dated 30 March 2021.

The *RMP* explains that:

“Systematic management of records allows organisations to:

- know what records they have, and locate them easily
- increase efficiency and effectiveness
- make savings in administration costs, both in staff time and storage
- support decision making
- be accountable
- achieve business objectives and targets
- provide continuity in the event of a disaster
- meet legislative and regulatory requirements
- protect the interests of employees, clients and stakeholders”

The Keeper fully agrees this statement and notes that the implementation of the agreed *Records Management Plan* will assist Western Isles IJB to achieve these aims.

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 **Western Isles Integration Joint Board (Cùram Is Slàinte nan Eilean Siar)**. Policies and governance structures are in place to implement the actions required by the plan.

Elements that require development by Western Isles Integration Joint Board are as follows:

- 4. Business Classification
- 6. Destruction Arrangements
- 10. Business Continuity and Vital Records
- 11. Audit trail

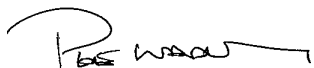
The Keeper acknowledges that these elements require improvement action on the part of the authority on whose systems the IJB's public records are managed rather than by the IJB itself.

7. Keeper's Determination

Based on the assessment process detailed above, the Keeper agrees the RMP of **Western Isles Integration Joint Board (Cùram Is Slàinte nan Eilean Siar)**.

- The Keeper recommends that Western Isles Integration Joint Board (Cùram Is Slàinte nan Eilean Siar) 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 **Western Isles Integration Joint Board (Cùram Is Slàinte nan Eilean Siar)**. In agreeing this RMP, the Keeper expects Western Isles Integration Joint Board to fully implement the agreed RMP and meet its obligations under the Act.



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Laura Mitchell
Deputy Keeper of the Records of Scotland