

**Public Records (Scotland) Act 2011**

**Aberdeenshire Integration Joint Board**

**The Keeper of the Records of Scotland**

**27<sup>th</sup> January 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 Aberdeenshire Integration Joint Board by the Public Records (Scotland) Act 2011 Assessment Team following its submission to the Keeper on 30<sup>th</sup> November 2020.

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

## 3. Authority Background

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

The Aberdeenshire Integration Joint Board (IJB) is a joint board of Aberdeenshire Council and NHS Grampian. It oversees the Aberdeenshire Health and Social Care Partnership (AHSCP). The IJB manage adult Social Care and Health services in Aberdeenshire.

The IJB operates as a body corporate (a separate legal entity), acting independently of the Health Board and the Council. The IJB consists of 5 Aberdeenshire Councillors and 5 NHS Grampian Board members. There are also non-voting members which include council and NHS officers as well as representatives from users of adult health and social care services, carers groups, trade unions and the third sector.

[Integration Joint Board - Aberdeenshire Council](#)

The duties of the IJB are published here:

[cusersspellascdocumentsduties-of-the-integration-joint-board-v3.pdf \(aberdeenshire.gov.uk\)](https://www.aberdeenshire.gov.uk/cusersspellascdocumentsduties-of-the-integration-joint-board-v3.pdf)

## 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 Aberdeenshire 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

**Explanation: All public records of the Aberdeenshire Integration Joint Board are held on Aberdeenshire Council systems and, as this is the case, the IJB must adopt the records management provision of the Council. This is made clear in the *Records Management Plan* (for example under element 4 – “All Aberdeenshire IJB records are held digitally on Aberdeenshire Council systems”) and in *Covering Letters* from the Chief Officer of the IJB and from the Council. Signed copies of these *Letters* have been provided to the Keeper.**

***Covering Letter to the Keeper of the Records of Scotland* from Angie Wood Interim Chief Officer, Aberdeenshire Health & Social Care Partnership: "Aberdeenshire IJB can confirm that all records and documents created by the Aberdeenshire IJB are managed and maintained within Aberdeenshire Council systems." Ms Wood has recently been replaced by Pamela Milliken (see element 1), but the Keeper is satisfied that the arrangements explained in Ms Woods Covering Letter are still in effect.**

**“All officers who have access to IJB records are governed by Aberdeenshire Council’s policies and procedures relating to records management.” *RMP* page 7.**

**The Keeper agreed the *Records Management Plan (RMP)* of Aberdeenshire Council in November 2015:  
[Keeper's Assessment Report- Aberdeenshire Council and Aberdeenshire Licensing Boards \(nrscotland.gov.uk\)](https://www.nrscotland.gov.uk/records/assessment-reports/aberdeenshire-council-and-aberdeenshire-licensing-boards)**

Element	Present	Evidence	Notes
1. Senior Officer	<b>G</b>	<b>G</b>	<p>The Public Records (Scotland) Act 2011 (the Act) requires that an individual senior staff member is identified as holding corporate responsibility for records management in a public authority.</p> <p>Aberdeenshire Integration Joint Board (the IJB) have identified Pamela Milliken Chief Officer, as the individual with overall responsibility for records management in the authority.</p> <p>Ms Milliken replaces the Interim Chief Officer who was in post at the time of the authority's original submission. This change is supported by a <i>Covering Letter</i> from Ms Milliken which has been provided to the Keeper (December 2021).</p> <p>Ms Milliken is now the 'Corporate Owner' of the <i>Records Management Plan</i> (the <i>RMP</i>)</p> <p>The Chief Officer is also the IJB's Senior Information Risk Owner (SIRO).</p> <p>The Keeper agrees that Aberdeenshire 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	<b>G</b>	<b>G</b>	<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>Aberdeenshire Integration Joint Board have identified Kate Bolsover, Information Governance Officer of Aberdeenshire Council, 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 Aberdeenshire Council systems (see explanation above and element 4 below). Ms. Bolsover is the Council records manager and as such has full access to the IJB's public records. In 2015 the Keeper agreed that Ms Bolsover was a suitable individual to take on this role for Aberdeenshire Council.</p> <p>Aberdeenshire Integration Joint Board have also identified David Gammack, Information Systems Manager, Aberdeenshire HSCP. Mr Gammack has access to the Council's Records Manager for advice when appropriate.</p> <p>Both individuals share the following responsibilities:</p> <ul style="list-style-type: none"> <li>• Managing the IJB's records;</li> <li>• Reviewing and implementing operational policies and procedures in line with the RMP;</li> <li>• Ensuring relevant health and social care staff have records management training</li> </ul> <p>The <i>RMP</i> makes a commitment to provide specific training programme for Mr Gammack. However, at the time of assessment, this had not yet been provided. However, an internal 'Introduction to Records Management' module has been developed by Aberdeenshire Council and is available to all staff including Mr Gammack.</p> <p>The Keeper agrees that, as IJB public records are managed by Aberdeenshire</p>
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			Council, Kate Bolsover and David Gammack are appropriate individuals to be identified to this role.
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>All the public records of the IJB are held digitally on the record keeping systems of Aberdeenshire Council. As this is the case, they are managed under the Records Management Policy of the Council. This is acknowledged in the <i>RMP</i>:          “Aberdeenshire IJB has fully adopted and are committed to the Records Management Policy of Aberdeenshire Council” (<i>RMP</i> page 7). In November 2015, the Keeper agreed that the Records Management Policy of Aberdeenshire Council was appropriate for the management of the authority’s public records: <a href="http://nrscotland.gov.uk">Keeper's Assessment Report- Aberdeenshire Council and Aberdeenshire Licensing Boards (nrscotland.gov.uk)</a></p> <p>Therefore the Keeper agrees that Aberdeenshire Integration Joint Board have ensured that their public records are managed under a suitable records management policy statement as required by the Act.</p>
4. Business Classification	<b>A</b>	<b>G</b>	<p>The Keeper expects that the public records of an authority are known and are identified within a structure.</p> <p>Aberdeenshire Integration Joint Board’s <i>RMP</i> (page 4) confirms that “For records to perform their various functions, some form of management is needed. Management includes control over what is created, development of effective and efficient filing systems to store records, and procedures for retention of records.”</p> <p>All Aberdeenshire IJB records are held digitally on Aberdeenshire Council systems.</p>

			<p>The IJB therefore follow the Business Classification procedures of Aberdeenshire Council. A screen-shot has been provided to the Keeper showing IJB records on the Council systems.</p> <p>A <i>Covering Letter</i> from the Council has also been provided that supports this arrangement: “Aberdeenshire Council can confirm that all records and documents created by the Aberdeenshire IJB are managed and maintained within Council systems. Furthermore, we can confirm that these records and documents follow the Council’s Retention Schedules and Business Classification Scheme.”</p> <p><b>However, when the Keeper agreed this element of the Aberdeenshire Council’s RMP he did so under ‘improvement model’ terms as they are in a state of transition with regard to their Business Classification Scheme. This is acknowledged in the IJB’s RMP which states (page 8): “Aberdeenshire BCS is currently being reviewed and still to be formally approved.”</b></p> <p><b>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.</b></p> <p><b>Therefore, the Keeper agrees element 4 on the same ‘improvement model’ terms as the Council.</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>Aberdeenshire Integration Joint Board’s <i>RMP</i> (page 4) confirms that “For records to perform their various functions, some form of management is needed. Management</p>

			<p>includes control over what is created, development of effective and efficient filing systems to store records, and procedures for retention of records.”</p> <p>The introduction to the <i>RMP</i> (also page 4) states that it is a principle of robust records management that "There are consistent and documented retention and disposal procedures, including provision for permanent preservation of archival records”.</p> <p>All Aberdeenshire IJB records are held digitally on Aberdeenshire Council systems.</p> <p>A <i>Covering Letter</i> from the Council has also been provided that supports this arrangement: “Aberdeenshire Council can confirm that all records and documents created by the Aberdeenshire IJB are managed and maintained within Council systems. Furthermore, we can confirm that these records and documents follow the Council’s Retention Schedules and Business Classification Scheme.”</p> <p>The IJB therefore follow the retention procedures of Aberdeenshire Council. A screen-shot has been provided to the Keeper showing IJB records on the Council systems.</p> <p>The IJB have provided the Keeper with a letter from the HSCP Chief Officer, Pam Milliken (see element 1) advising that the IJB are able to engage with Aberdeenshire Council regarding retention periods applied to records.</p> <p><b>When the Keeper agreed this element of the Aberdeenshire Council’s <i>RMP</i> he did so under ‘improvement model’ terms as they are in a state of transition with regard to their Retention Schedule.</b></p> <p><b>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</b></p>
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			<p><b>separate authority, cannot be higher than that awarded to the ‘host’ authority.</b></p> <p><b>Therefore, the Keeper agrees element 5 on the same ‘improvement model’ terms as the Council.</b></p>
6. Destruction Arrangements	<b>G</b>	<b>G</b>	<p>The Act requires that public records are destroyed in a timely, controlled and secure manner.</p> <p>The Introduction to the <i>RMP</i> (page 4) states that it is a principle of robust records management that "There are consistent and documented retention and disposal procedures, including provision for permanent preservation of archival records".</p> <p>All the public records of the IJB are held digitally in the main records management system of Aberdeenshire Council. As this is the case they are subject to the destruction processes of the Council.</p> <p>This is acknowledged in the <i>RMP</i> "Destruction of the Aberdeenshire IJB records, in all formats, will be undertaken in line with Aberdeenshire policies and procedures." (<i>RMP</i> page 10). Currently, there is only one format (digital) to which the Council has to apply their destruction procedures on behalf of the IJB.</p> <p>It is normally the case 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. In 2015 the Keeper agreed this element of Aberdeenshire’s RMP on improvement model terms due to a recognised gap in provision. However, this gap specifically related to the lack of controlled destruction in bespoke line of business systems sitting outside the main records management system (which was, in 2015, TRIM eDRM). In this very particular case, the Keeper can therefore accept that the Amber RAG status does not apply to IJB records. They are held on the main system and with proper</p>

			<p>retention applied (see element 5 above) can be appropriately destroyed.</p> <p>The Keeper therefore agrees that Aberdeenshire Integration Joint Board has processes in place to ensure the controlled, secure and irretrievable destruction of their public records when appropriate.</p>
7. Archiving and Transfer	<b>G</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 Introduction to the <i>RMP</i> (page 4) states that it is a principle of robust records management that "There are consistent and documented retention and disposal procedures, including provision for permanent preservation of archival records".</p> <p>The small selection of the IJB's public records that have been selected for permanent preservation will be transferred to Aberdeenshire Archives under the arrangements already operated by Aberdeenshire council. This is confirmed in the <i>RMP</i>: "Any Aberdeenshire IJB records of enduring value will be archived/transferred in line with Aberdeenshire Council policy." (<i>RMP</i> page 10).</p> <p>As with retention (see element 5), it is important that the IJB is involved in the selection of which of its information assets are permanently preserved. In this case that issue is addressed in the <i>RMP</i> "An Archive Working Group has now been created with IJB representation. This group will fully consider all archiving requirements of the IJB." (<i>RMP</i> page 10). Aberdeenshire Archives Group is led by the Senior Archivist from Aberdeen City Council and who operate a joint service for both Aberdeenshire and Aberdeen City Council. The group consists of records management reps from all services within the Council including the Aberdeenshire IJB. The group meets on a quarterly basis to collect, preserve and provide access to historical records relating to Aberdeenshire.</p>

			<p><b>The Keeper recognises that digital archiving in the Scottish public sector is in its infancy and it may be many years before those records selected for permanent preservation are transferred. However, it is important that arrangements are put in place as soon as possible and he encourages the IJB to pursue these arrangements.</b></p> <p>In 2015 the Keeper agreed that the archiving arrangements in Aberdeenshire Council were suitable for the permanent preservation of public records.</p> <p>Therefore the Keeper can agree that Aberdeenshire Integration Joint Board have arrangements in place to ensure that those records selected for permanent preservation are properly transferred to a suitable repository.</p>
8. Information Security	<b>G</b>	<b>G</b>	<p>The Act requires that public records are held in accordance with information security compliance requirements.</p> <p>The Introduction to the <i>RMP</i> (page 4) states that it is a principle of robust records management 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>All the public records of the IJB are managed on the record keeping systems of Aberdeenshire Council. Quite properly, the information security of these records is therefore provided by the Council. This is made clear in the <i>RMP</i> (page 11): "All systems, devices, information sharing platforms, etc. that the IJB relies upon are owned and maintained by Aberdeenshire Council".</p> <p>In November 2015, the Keeper agreed that the information security provision of</p>

			<p>Aberdeenshire Council was appropriate.</p> <p>The Keeper therefore agrees that Aberdeenshire Integration Joint Board has ensured that suitable provision is in place to guarantee the protection of their public records.</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>The IJB has adopted the Council's <i>Data Protection Policy</i> and other data protection procedures. As employees of the Council, the Board's staff are already required by their employment contract to comply with the Council's Data Protection Policy.</p> <p>However, the IJB is separately registered as a data controller with the Information Commissioner's Office: <a href="https://ico.org.uk/for-the-public/data-protection/register/">Information Commissioners - Data protection register - entry details (ico.org.uk)</a></p> <p>The IJB has published a <i>Privacy Notice</i> on the HSCP website: <a href="#">Integration Joint Board - Aberdeenshire Council</a>. This <i>Privacy Notice</i> has also been submitted to the Keeper.</p> <p>The Keeper agrees that Aberdeenshire Integration Joint Board is aware of its obligations under the 2018 data protection legislation and has procedures in place to protect the personal information it collects and processes.</p>
10. Business Continuity and Vital Records	<b>G</b>	<b>G</b>	<p>The Keeper expects that record recovery, prioritising vital records, is an integral part of the authority's business continuity planning.</p> <p>All Aberdeenshire IJB public records are held digitally on Aberdeenshire Council</p>

			<p>systems. Therefore all IJB records are subject to the policies and procedures of Aberdeenshire Council in relation to business continuity.</p> <p>This is made clear in the <i>RMP</i> (page 14).</p> <p>In 2015 the Keeper agreed that the business continuity processes explained in the Aberdeenshire Council's <i>Records Management Plan</i> were appropriate:  <a href="https://www.nrscotland.gov.uk/files//record-keeping/public-records-act/keepers-assessment-report-aberdeenshire-council-and-licensing-boards.pdf">https://www.nrscotland.gov.uk/files//record-keeping/public-records-act/keepers-assessment-report-aberdeenshire-council-and-licensing-boards.pdf</a></p> <p>Therefore, the Keeper agrees that Aberdeenshire Integration Joint Board have ensured that their public records are subject to robust record recovery procedures.</p>
11. Audit trail	<b>A</b>	<b>G</b>	<p>The Keeper expects an authority to have processes in place to track public records in such a way that their location is known and changes recorded.</p> <p>The Introduction to the <i>RMP</i> (page 4) states that it is a principle of robust records management 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 a principle 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."</p> <p>All the public records of the IJB are held on the record keeping systems of Aberdeenshire Council and must therefore be tracked and identified using those systems. This arrangement is acknowledged in the <i>RMP</i> (page 15).</p> <p><b>When the Keeper agreed this element of the Aberdeenshire Council's <i>RMP</i> he did so under 'improvement model' terms as they are in a state of transition</b></p>

			<p>with regard to their audit trail.</p> <p>The Keeper has determined that the RAG status of a <i>Records Management Plan</i> of any authority, whose records are managed on the systems of a separate authority, cannot be higher than that awarded to the ‘host’ authority.</p> <p>Therefore, the Keeper agrees element 11 on the same ‘improvement model’ terms as the Council.</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 records management training of Kate Bolsover is addressed in this element, but there is currently no provision specifically for IJB staff.</p> <p><b>However, it seems that the IJB is committed to improving the records management training for its staff. The RMP (page 6) shows as ‘further developments’: “Appropriate Records Management training is being investigated for Information Systems Manager role” and “An online training course – Introduction to Records Management has been developed and will be rolled out to all staff.” In December 2021, the IJB updated the Keeper as follows: “An internal on-line module ‘Introduction to Records Management’ has been developed and is available to all staff. Specific records management training for the Information Systems Manager has still to be progress but been delayed due to Covid 19.” This is a welcome update.</b></p> <p>As he is confident that the Information Systems Manager can rely on the support of the Council’s Records Manager and has access to the Introduction to Records Management Module, the Keeper his happy to agree this element of the Aberdeenshire Integration Joint Board <i>Records Management Plan</i>. He would be</p>

			<p>pleased to be informed when specific training for the Information Systems Manager is resourced.</p>
<p>13. Assessment and Review</p>	<p><b>A</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.</p> <p>This is acknowledged in the IJB's <i>RMP</i> (page 3).</p> <p>The <i>RMP</i> commits the IJB to engage with the Progress Update Review (PUR) process annually (page 17). Acknowledging this, the Keeper's PRSA Assessment Team will provide the IJB with a PUR template each year. The completion and submission of this template is entirely voluntary, but it is welcome that the IJB are planning to utilise the PUR process as a prompt (and reporting mechanism) for their annual review.</p> <p>The IJB have explained that the <i>Records Management Plan</i> will be reviewed by the Council's Information and Records Management Group (IMRG). Review of records management plans part of the remit of the group. As noted against element 7, the IJB has representation on the IMRG and are therefore directly involved in the review of their plan.</p> <p>The IMRG approved a new formalised methodology of assessment and review in 2020. The foundation of this is a Maturity Model based on the records management plan, compliance with Aberdeenshire Council policy and good practice. It is intended to be used as part of an annual review with the IJB able to assess progress against the records management plan and records management maturity.</p> <p>Results from this annual review will be shared with the HSCP Chief Officer and Senior Management Team.</p> <p><b>In November 2015, The Keeper agreed this element of Aberdeenshire</b></p>

			<p>Council's under 'improvement model' terms. Although the Assessment Team recognises that improvements were made in 2020 (as noted above), the formal RAG status for the Council remains 'Amber' awaiting the submission of a new Council <i>RMP</i> for agreement.</p> <p>The Keeper has determined that the RAG status of a <i>Records Management Plan</i> of any authority, whose records are managed on the systems of a separate authority, cannot be higher than that awarded to the 'host' authority.</p> <p>Therefore, the Keeper should be able to agree element 13 on the same 'improvement model' terms as the Council.</p>
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>As part of its function, Aberdeenshire Integration Joint Board shares information with other bodies when appropriate and does so under a Health and Social Care Integration <i>Data Sharing Agreement (incorporating Service Level Agreement)</i> which has been shared with the Keeper.</p> <p>The Keeper agrees that the <i>Data Sharing Agreement</i> appropriately considers information governance issues.</p> <p>The Keeper can agree that Aberdeenshire Integration Joint Board properly considers records governance when undertaking information sharing programmes.</p>
15. Public records	<b>N/A</b>	<b>N/A</b>	<b><u>Third Parties:</u></b>

<p>created or held by third parties</p>			<p>The Public Records (Scotland) Act 2011 (PRSA) makes it clear that records created by third parties when carrying out the functions of a scheduled authority should be considered 'public records' - PRSA Part 1 3 (1)(b).</p> <p>The IJB have clearly stated: "No functions of the IJB are pursued by any third party with the exception of Aberdeenshire Council who manages the IJB records."</p> <p>The Keeper agrees that this element does not currently apply to the IJB.</p>
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**Explanation: All public records of the Aberdeenshire Integration Joint Board are held on Aberdeenshire Council systems and, as this is the case, the IJB must adopt the records management provision of the Council. This is made clear in the *Records Management Plan* (for example under element 4 – “All Aberdeenshire IJB records are held digitally on Aberdeenshire Council systems”) and in *Covering Letters* from the Chief Officer of the IJB and from the Council. Signed copies of these *Letters* have been provided to the Keeper.**

**"Aberdeenshire IJB can confirm that all records and documents created by the Aberdeenshire IJB are managed and maintained within Aberdeenshire Council systems." Covering Letter to the Keeper of the Records of Scotland from Angie Wood Interim Chief Officer, Aberdeenshire Health & Social Care Partnership. Ms Wood has recently been replaced by Pamela Milliken (see element 1), but the Keeper is satisfied that the arrangements explained in Ms Woods Covering Letter are still in effect.**

**“All officers who have access to IJB records are governed by Aberdeenshire Council’s policies and procedures relating to records management.” *RMP* page 7.**

**The Keeper agreed the *Records Management Plan (RMP)* of Aberdeenshire Council in November 2015:  
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## **General Notes on RMP, Including Concerns:**

### Version

This assessment is on the *Records Management Plan* (the *RMP*) of Aberdeenshire Integration Joint Board (the IJB). This is the version provided to the Keeper on 30<sup>th</sup> November 2020.

The *RMP* was accompanied by *Covering Letters* from Karen F. Wiles, Head of Legal and Governance in Aberdeenshire Council (dated 26th November 2020) and another from Angie Wood, Interim Chief Officer, Aberdeenshire Health & Social Care Partnership (see element 1). It was also accompanied by the *Job Description* of the IJB's Information Systems Manager (see element 2) and the Aberdeenshire Joint Integration Board *Privacy Notice* and Information Commissioner's Office *Registration* (see element 9). The Keeper has also been provided with the current *Data Sharing Agreement* between the IJB, the Council and NHS Grampian (Grampian Health Board).

The *RMP* states that "Aberdeenshire Integration Joint Board is fully committed to compliance with the requirements of the Public Records (Scotland) Act, which came into force on the 1st January 2013." and "The Board is fully committed to creating, managing, disclosing, protecting and disposing of information effectively and legally." (*RMP* pages 1 and 3). The Keeper welcomes these commitments.

The *RMP* also states that robust records management processes allow an authority to make:

- Better decisions based on complete information.
- Smarter and smoother work practices.
- Consistent and collaborative workgroup practices.
- Better resource management.
- Support for research and development.
- Preservation of vital and historical records  
(*RMP* page 3)

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

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

Elements that require development are as follows:

- 4. Business Classification
- 5. Retention schedule
- 11. Audit trail
- 13. Assessment and Review

**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 Aberdeenshire Integration Joint Board.

- The Keeper recommends that Aberdeenshire 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,



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**Pete Wadley**  
Public Records Officer

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**Liz Course**  
Public Records Officer

## 8. Endorsement of Report by the Keeper of the Records of Scotland

The report has been examined and is endorsed under the signature of the Keeper of the Records of Scotland as proof of compliance under section 1 of the Public Records (Scotland) Act 2011, and confirms formal agreement by the Keeper of the RMP as submitted by Aberdeenshire Integration Joint Board. In agreeing this RMP, the Keeper expects Aberdeenshire Integration Joint Board to fully implement the agreed RMP and meet its obligations under the Act.



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