

Integration Joint Board
18th March 2021

Subject:	North Ayrshire Integration Joint Board - Records Management Plan
Purpose:	North Ayrshire Integration Joint Board (NAIJB) approves the response to the Keeper's Interim Report on NAIJB Records Management Plan
Recommendation:	The Integration Joint Board is asked to: 1. Note the report 2. Approve the response to the Keeper of the Records of Scotland's Interim Report

NAIJB	North Ayrshire Integration Joint Board
RMP	Records Management Plan

1.	EXECUTIVE SUMMARY
1.1	The Public Records (Scotland) Act requires named public authorities to submit a Records Management Plan (RMP) to be agreed by the Keeper of the Records of Scotland.
1.2	North Ayrshire Integration Joint Board (NAIJB) submitted a RMP for the Keeper's consideration in February 2019. In November 2020 the Keeper provided an Interim Report on NAIJB Records Management Plan, requesting further confirmation/ evidence on Elements 4, 5, 7, 9, 12 and 13, alongside additional information on the new Element 15. In addition, with the appointment of the new Chief Officer, evidence previously submitted with the RMP required to be updated.
1.3	<p>The RMP now covers 15 elements which the Board will implement:</p> <ol style="list-style-type: none"> 1. Senior Management responsibility 2. Records Manager responsibility 3. Records Management policy statement 4. Business Classification 5. Retention Schedules 6. Destruction arrangements 7. Archiving and transfer arrangements 8. Information Security 9. Data Protection 10. Business continuity and vital records 11. Audit trail 12. Competency framework for records management staff 13. Assessment and review 14. Shared Information 15. Public records created or held by third parties

	Additional compliance statements and evidence are contained within the Interim Report response.
1.4	All NAIJB records sit within North Ayrshire Council systems and are managed in accordance with North Ayrshire Council policies and procedures. Ms Lauren Lewis, Information Management Officer is the designated Officer of the Council who has operational responsibility for North Ayrshire Council and NAIJB records management.
1.5	Records of NAIJB may be of historical interest and as per North Ayrshire Council's Records Retention Schedule relating to Committee papers, will be retained permanently.
1.6	North Ayrshire Council will undertake an Annual Review of the NAIJB RMP and report the findings to NAIJB.
1.7	The Senior Officer of NAIJB and the Chief Executive of North Ayrshire Council have endorsed the NAIJB RMP.
3.	PROPOSALS
3.1	NAIJB to approve the response to the Keepers Interim Report
3.2	<u>Anticipated Outcomes</u>
	N/A
3.3	<u>Measuring Impact</u>
	N/A
4.	IMPLICATIONS

Financial:	None
Human Resources:	None
Legal:	The Public Records (Scotland) Act 2011 places a number of duties on the Integration Joint Board. Where authorities fail to meet their obligations under the Act, the Keeper has powers to undertake records management reviews and issue action notices for improvement.
Equality:	None
Children and Young People	None
Environmental & Sustainability:	None
Key Priorities:	Consider the impacts on key priorities and plans.
Risk Implications:	Failure to comply with the Public Records (Scotland) Act 2011 presents a legal and reputational risk to the Integration Joint Board
Community Benefits:	N/A

Direction Required to Council, Health Board or Both	Direction to :-	
	1. No Direction Required	
	2. North Ayrshire Council	x
	3. NHS Ayrshire & Arran	
	4. North Ayrshire Council and NHS Ayrshire & Arran	

5.	CONSULTATION
5.1	Consultation has taken place with Information Governance representatives from both NHS Ayrshire & Arran and North Ayrshire Council.

For more information please contact Julie Davis, Principal Manager Business Administration on 01294 317766 or jdavis@north-ayrshire.gov.uk

Interim Report on the submitted records management plan for North Ayrshire Integration Joint Board

This document is not the formal Keeper's Report on your plan.

This document has not been forwarded to the senior officer named in the plan.

This interim report gives us the opportunity to let you know what our current thinking on your submitted plan is. It also gives you the opportunity to correct any misunderstandings on our part and to query any statements that we may have made that misrepresent the actual position in your authority.

It may be that, in the general comments at the end, we have made suggestions how your plan might be strengthened, where further evidence might be submitted for example. Please consider these suggestions and let us know your views.

If, in light of our comments, you decide to add new evidence, submit updated versions of documents or make changes to the text of your RMP, please highlight these changes to us, either by adding comments to this report and returning it to us, or by providing us with a separate list.

If we have not heard from you by **31st December 2020** we will assume you are content and will go ahead with our proposed recommendation to the Keeper.

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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North Ayrshire Integration Joint Board
(‘The IJB’ in the assessment below)

Explanation: All public records of the North Ayrshire Integration Joint Board are held on North Ayrshire Council systems and, as this is the case, the IJB must adopt the records management provision of the Council. This is made clear in the *Records Management Plan* (for example page 6) and in a *Covering Letter* from the Chief Executive of North Ayrshire Council.

“It has been identified whilst engaging with the Records Management Plan process that currently all North Ayrshire Integration Joint Board records are held within North Ayrshire Council’s systems and offices.” (*Covering Letter from North Ayrshire Council CEO* – see under General Comments below).

The Keeper agreed the *Records Management Plan* of North Ayrshire Council in July 2015:

<https://www.nrscotland.gov.uk/files//record-keeping/public-records-act/keepers-assessment-report-north-ayrshire.pdf>

In 2017 North Ayrshire Council provided the Keeper with an update on their RMP:

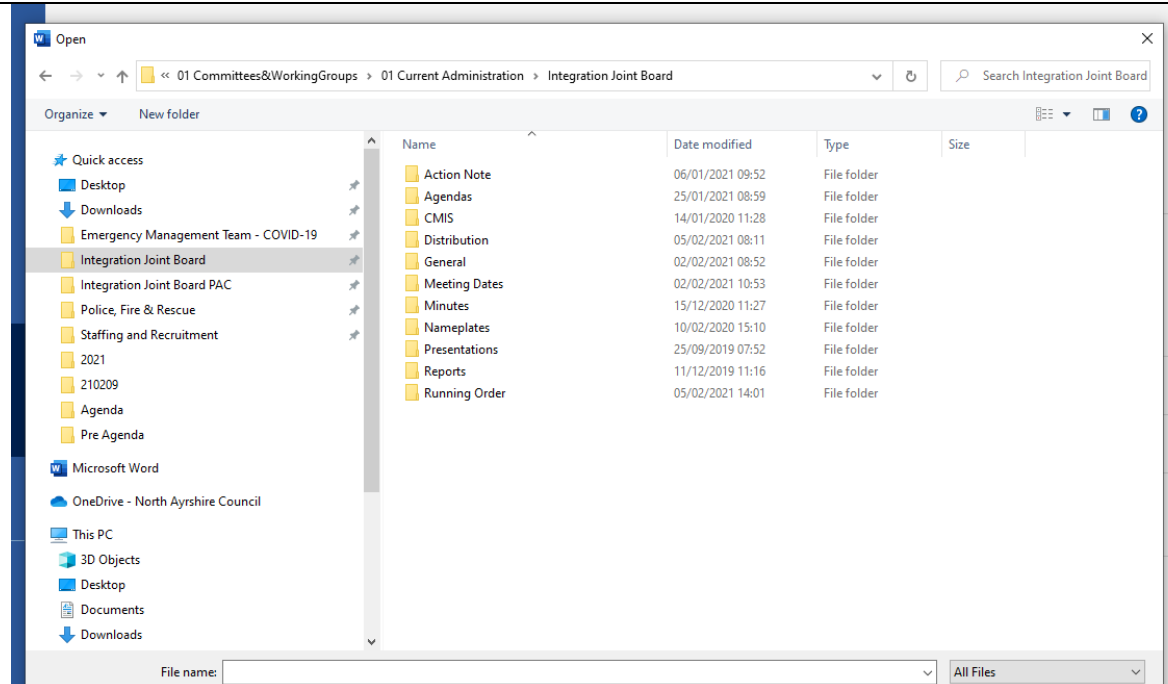
<https://www.nrscotland.gov.uk/files//record-keeping/public-records-act/pur-final-report-for-north-ayrshire-council-and-licensing-board.pdf>

Element Checklist

Element	Present	Evidence	Notes
1. Senior Officer Compulsory Element	G	G	<p>North Ayrshire Integration Joint Board (the IJB) have identified Stephen Brown Chief Officer, as the individual with overall responsibility for records management in the authority.</p> <p>This is confirmed by a <i>Covering Letter</i> from the Chief Officer: "As the Chief Officer I confirm that I have overall responsibility for the North Ayrshire Integration Joint Board Records Management Plan which has my full support and that of the Integration Joint Board members."</p> <p>The <i>Covering Letter</i> from Mr Brown also confirms the records management arrangements with the Council explained above.</p> <p>The IJB's Chief Officer is also the IJB's Senior Information Risk Owner (SIRO).</p> <p>The Keeper agrees that North Ayrshire Integration Joint Board have identified an appropriate individual to this role as required by the Public Records (Scotland) Act 2011 (the Act).</p>
			<p>Note : A new Chief Officer Mrs Caroline Cameron has been appointed to North Ayrshire Integration Joint Board. Mrs Cameron is also the IJB's Senior Information Risk Owner (SIRO). A replacement covering letter is submitted from Mrs Cameron.</p>
2. Records Manager Compulsory Element	G	G	<p>The Act requires that each authority identifies an individual staff member as holding operational responsibility for records management and has appropriate corporate responsibility, access to resources and skills.</p>

			<p>North Ayrshire Integration Joint Board have identified Lauren Lewis, Information Management Officer North Ayrshire Council, as the individual with day-to-day responsibility for implementing the <i>Records Management Plan</i> (the <i>Plan</i>) in the authority.</p> <p>This is confirmed by a <i>Covering Letter</i> from the Chief Officer, which has been supplied to the Keeper.</p> <p>All the public records of the IJB are stored and managed on North Ayrshire Council systems (see explanation above and element 4 below). Ms. Lewis is the Council Records Manager and as such has full access to the IJB's public records. In 2015 the Keeper agreed that the Information Management Officer was a suitable individual to take on this role for North Ayrshire Council (this was a previous post-holder).</p> <p>The Keeper agrees that the Council's Information Management Officer is an appropriate individual to be identified to this role.</p>
3. Policy Compulsory Element	G	G	<p>The Act requires an authority to have an appropriate policy statement on records management.</p> <p>The <i>Plan</i> states that "The Board has adopted and is fully committed to the Records Management Policy of North Ayrshire Council. All Officers who have access to IJB records are governed by North Ayrshire Council's policies and procedures relating to records management."</p> <p>As all the public records of the IJB are managed on the systems of North Ayrshire Council, the adoption of the Council's <i>Records Management Policy</i> is entirely suitable.</p> <p>This arrangement has been agreed by North Ayrshire Council. A <i>Covering Letter</i> from the Chief Executive of the Council, addressed to the Keeper, confirms: "The North Ayrshire Integration Joint Board is bound by the records management policies, strategies and frameworks as stipulated under Element 3 in North Ayrshire Council's Records Management Plan."</p>

			<p>In July 2015, the Keeper agreed that the <i>Records Management Policy</i> of North Ayrshire Council was appropriate for the robust management of their public records. He also was provided with evidence that the <i>Policy</i> is available to staff through the Council's intranet, Navigate. As all IJB staff have automatic access to the intranet, the Keeper is satisfied that they have access to the <i>Policy</i>.</p> <p>The Keeper agrees that North Ayrshire Integration Joint Board has adopted an operational policy which sets out the corporate approach to records management as required by the Act.</p>
4. Business Classification	G	A	<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 <i>Plan</i> explains that "The Board's records will be wholly created and managed on North Ayrshire Council systems. The Council has a comprehensive and in-depth Information Asset Register (IAR) which is based on the Local Government Classification Scheme (<i>Plan</i> page 6).</p> <p>This is confirmed by a <i>Covering Letter</i> from the Chief Officer of the IJB: "...records will be managed in accordance with North Ayrshire Council policies and procedures..." and the arrangement agreed by the Chief Executive of North Ayrshire Council: "All records created by the North Ayrshire Integration Joint Board are held within North Ayrshire Council's networks and systems and as such, are managed using the Local Government Classification Scheme (LGCS)." (<i>Covering Letter</i> from NAC Chief Executive)</p> <p>Please see below screenshot confirming the digital file structure of the North Ayrshire Integration Joint Board records:</p>



Please see below extract from North Ayrshire Council’s Information Asset Register, showing Committee Papers entry:

North Ayrshire Council

NAC\hunterla

Information Asset Register

System Admin

Add User

Amend User

Add SIRO

Amend SIRO

Add IT Managed System

Amend IT Managed System

Add IT Server

Amend IT Server

Amend Risk Actions

Manage Assets

Add Asset

Amend Asset

Search Asset

Request Asset Sign Off

Assets Not Completed

Reports

Review Due

No Review Date

Asset Risk Level

Historical Assets

Assets Waiting Approval

Approved Assets

Rejected Assets

Assets with Risk Actions

All Assets

Search Results

Name of Asset: committee papers

ID	Name	Description	Type	Next Review Date	Asset Owner	Additional Asset Owner	Location	Risk Level	Directorate	Service	Team	Sub Team
2450	Committee Papers	Contains correspondence relating to all committees within NAC/NA IJB	Electronic	02/09/2021 00:00:00			Cunninghame House, IT Computer Suite	Low	Democratic Services	Democratic Services		Committee Services

New Search

Export to Excel

Cancel

To evidence the availability of the North Ayrshire Integration Joint Board’s Public Records, please find attached link to the website:

[The IJB – North Ayrshire Health & Social Care Partnership \(nahscp.org\)](http://nahscp.org)

A30784846 - NRS - Public Records (Scotland) Act (PRSA) - Integration Joint Board North Ayrshire - Interim Report

Official Information

5. Retention schedule	A	A	<p>The Keeper expects an authority to have allocated retention periods to its public records and for those records to be retained and disposed of in accordance with a retention schedule.</p> <p>As explained under element 4, the <i>Plan</i> makes it clear that the public records of the IJB are held in the record keeping systems of North Ayrshire Council.</p> <p>The Keeper agrees it entirely appropriate therefore that those records are subject to the retention and destruction processes of the Council.</p> <p>However, whereas the <i>Plan</i> states (page 7) that “IJB records are maintained in line with North Ayrshire Council Retention and Disposal Schedules...” The Covering Letter from the Chief Executive of the Council states “North Ayrshire Council’s records retention schedule <u>will</u> be updated to reflect the incorporation of North Ayrshire Integration Joint Board records [our emphasis]. The Keeper requires clarification as to whether the public records of the IJB are currently part of the Council’s retention schedule or whether this remains a future development.</p> <p>Retentions are applied to the public records of the IJB as per North Ayrshire Council’s Records Retention Schedule and selected dependent on the core business function of the records. It is of note that the current retention schedule of North Ayrshire Council is under review as part of a separate project and any retention(s) applicable to the Integration Joint Board will be reworded to reflect this.</p> <p>See below references to North Ayrshire Council Records Retention Schedules:</p> <p>DP2.1 – Council and Committee Meetings – Permanent – Transfer to Records Management Unit after administrative use is concluded – Statutory Requirement – Only the master/signed copies of Minutes need to be retained in the archive</p> <p>FN3.1 – The process of finalising Local Authority’s annual accounts – Permanent – Offer to Archivist via Records Management Unit after administrative use is concluded – Common Practice – Only the final version of the annual budget needs to be kept</p>
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			<p>FN 3.2 – The process of developing the Local Authority’s annual budget – Cy+6 Destroy – Common Practice</p> <p>Furthermore, it is important that the IJB can be confident that the retention decisions allocated to their information assets are suitable for their business needs. A statement is required in evidence that IJB staff had input into the retention periods assigned to their records.</p> <p><i>Attached copy report to NAIJB of 18/03/21 refers to permanent records</i></p> <p>With clarification around the inclusion of IJB records in the Council’s retention schedule and a statement from the IJB that they were involved in the allocation of retention decisions to their records, the Keeper should be able to agree that North Ayrshire Integration Joint Board has ensured that all their public records are subject to suitable retention periods. This may be an ‘improvement model’ agreement if the IJB has yet to be included in the Council’s retention schedule as suggested in the Chief Executive’s <i>Covering Letter</i>.</p>
6. Destruction Arrangements Compulsory Element	G	G	<p>See under element 4 and 5 for a) evidence that IJB records are part of the Council’s IAR and b) confirmation that IJB records are part of the Council’s Retention Schedule.</p> <p>The Act requires that public records are destroyed in a timely, controlled and secure manner.</p> <p>The <i>Plan</i> states that “Destruction of Board records, in all formats, will be undertaken in line with North Ayrshire Council policies and procedures.”</p> <p>As all the public records of the IJB are managed on the systems of North Ayrshire Council, the adoption of the Council’s destruction procedures is practical.</p> <p>This arrangement has been agreed by North Ayrshire Council. A <i>Covering Letter</i> from the Chief Executive of the Council, addressed to the Keeper, confirms: “The destruction process for North</p>

			<p>Ayrshire Integration Joint Board records will be undertaken in line with North Ayrshire Council's procedures and practices."</p> <p>In July 2015, the Keeper agreed that the destruction processes in North Ayrshire Council were strong. He also was provided with staff guidance on record destruction which he accepts will apply to the records of the IJB.</p> <p>Assuming that the Keeper's questions under elements 4 and 5 are satisfactorily addressed, the Keeper should be able to agree that North Ayrshire Integration Joint Board have adequate processes in place to ensure the secure, controlled and irretrievable of their public records when appropriate.</p>
7. Archiving and Transfer Compulsory Element	A	A	<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 relies on the archiving policies of the Council. This is reasonable as any public record of the IJB identified for permanent preservation will be held on Council systems.</p> <p>North Ayrshire Council, in conjunction with East Ayrshire and South Ayrshire Councils, operates 'Ayrshire Archives'. North Ayrshire Council deposits records selected for permanent preservation in Ayrshire Archives.</p> <p>As stipulated at Element 4, the IJB create digital records only and therefore are not covered by the archiving agreement and service provided by Ayrshire Archives under the North Ayrshire Council Archiving and Transfer Policy which covers paper records. The Integration Joint Board acknowledge the importance of digital preservation and take this on board for future consideration and will seek to investigate the development of a Digital Archiving Policy in conjunction with North Ayrshire Council.</p>

8. Information Security Compulsory Element	G	G	<p>The Act requires that public records are held in accordance with information security compliance requirements.</p> <p>The <i>Plan</i> states that “All systems, devices, information sharing platforms, etc. that the IJB relies upon are owned and maintained by North Ayrshire Council.” (<i>Plan</i> page 10). It makes practical sense, therefore, that the IJB relies on the information security processes of North Ayrshire Council including those relating to staff access and training. All staff managing IJB records are Council employees.</p> <p>The application of the Council’s information security procedures to IJB records is an arrangement that is supported by a <i>Covering Letter</i> from the Chief Executive of the Council: “All North Ayrshire Integration Joint Board records are held within North Ayrshire Council’s networks and are therefore subject to policies and procedures and evidenced under Element 8 of North Ayrshire Council’s Records Management Plan and subsequent Progress Update Review.”</p> <p>In both the Council’s original submission (2015) and in the Progress Update Review (PUR) referenced by the Chief Executive (2018) the Keeper agreed that robust procedures are in place to ensure that the information and systems used by the Council are protected by appropriate policies and procedures as required by the Act.</p>
9. Data Protection	R	R	<p>The Keeper expects a Scottish public authority to manage records involving personal data in compliance with data protection law.</p> <p>The <i>Plan</i> suggests that the IJB relies entirely on the data protection procedures of North Ayrshire Council, which the Keeper has already agreed are appropriate.</p> <p>North Ayrshire Integration Joint Board relies wholly upon the technical and organisational measures of North Ayrshire Council as a data controller (Information Commissioners - Data protection register - entry details (ico.org.uk)) as all records are held on the Council’s systems.</p>

			No personal data as defined by the Data Protection Act 2018 is processed by the Integration Joint Board as a legal entity and therefore would not be defined as a data controller in its own right.
10. Business Continuity and Vital Records			<p>The Keeper expects that record recovery, prioritising vital records, is an integral part of the authority's business continuity planning.</p> <p>All the public records of the IJB are managed on the record keeping systems of North Ayrshire Council. They are therefore subject to the record recovery arrangements of the Council. This is accepted in a <i>Covering Letter</i> from the Chief Officer of the IJB and agreed in a <i>Covering Letter</i> from the Chief Executive of the Council.</p> <p>The Keeper agreed this element of the North Ayrshire Council records management plan on 'improvement model' terms awaiting the approval of a sample <i>Business Continuity Plan</i> that had been provided with the submission. However, the Keeper acknowledges that in 2018 this updated evidence was provided.</p> <p>Therefore, the Keeper can agree that the public records of North Ayrshire Integration Joint Board are covered by an operational <i>Business Continuity Policy</i> and that information management and records recovery properly feature in North Ayrshire Council's plans.</p>
11. Audit trail	G	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>All the public records of North Ayrshire Integration Joint Board are held on the record keeping systems of North Ayrshire Council.</p> <p>The arrangement is confirmed by a <i>Covering Letter</i> from the Chief Executive of the Council which states "North Ayrshire Integration Joint Board records are subject to North Ayrshire Council's File Naming Convention and Document Control Guidelines."</p>

			<p>This is also supported by a <i>Covering Letter</i> from the Chief Officer of the IJB which states “NAIJB records will be managed in accordance with North Ayrshire Council policies and procedures”.</p> <p>The Keeper agrees that, as all the records are held on the Council’s systems, document tracking and identification must be facilitated utilising the practices of the Council.</p> <p>In July 2015 the Keeper agreed that the Council has procedures in place to ensure that the correct version of a record can be located.</p> <p>Therefore the Keeper can agree that North Ayrshire Integration Joint Board has procedures in place that will allow them to locate their records and assure themselves that the located record is the correct version.</p>
12. Competency Framework for records management staff	G	A	<p>The Keeper expects staff creating, or otherwise processing records, to be appropriately trained and supported.</p> <p>In both the <i>Plan</i> (page 14) and in a <i>Covering Letter</i> from the Chief Executive of North Ayrshire Council (Ms. Lewis’ employer) a commitment is made that “training is scheduled to ensure her continued development”.</p> <p>The <i>Plan</i> also explains that, as part of the GDPR rollout, all Council staff undertook a ‘comprehensive training programme’.</p> <p>There is no further detail on the contents of this course although the training is confirmed in general terms by statements in the Council’s 2017 Progress Update Review (PUR) (submitted June 2018). However, again details of what this involved were absent. The Keeper would be interested in any further details about the information governance training programme that could be provided.</p>

			<p>In 2015 the Keeper agreed that the staff training arrangements in North Ayrshire Council were appropriate and would be inclined to agree this element on that basis.</p> <p>If further details around the content of the staff training programme can be supplied, the Keeper should be able to agree that North Ayrshire Integration Joint Board has ensured that the individual identified at element 2 has access to appropriate training and development opportunities and furthermore that the IJB can be confident that all staff with access to their public records are suitably proficient in the records management aspects that are relevant to their role.</p> <p>Attached details of Information Management training and GDPR training</p>
13. Assessment and Review	A	G	<p>Section 1(5)(i)(a) of the Act says that an authority must keep its RMP under review.</p> <p>As all the public records of the IJB are managed on the systems of North Ayrshire Council, the adoption of the Council's review procedures is practical.</p> <p>The <i>Covering Letter</i> confirms that this arrangement is in place: "North Ayrshire Integration Joint Board records will be assessed and reviewed in line with North Ayrshire Council's information governance policies and procedures."</p> <p>The Keeper has already agreed that the review procedures operational in North Ayrshire Council are appropriate.</p> <p>However, the Keeper requires a statement regarding reporting. How are the results of the Council's review conveyed to the IJB so that they can be confident their public records are being managed as agreed?</p> <p>The results of the Council's Annual Progress Review will be reported separately to NAIJB</p>

			<p>The Plan notes that “NAIJB will participate in the annual Progress Update Review that is recommended by the National Records Scotland to ensure records management practices are regularly reviewed, and where necessary, require to be updated.” This commitment is welcomed by the Keeper and shows good evidence that the authority intends to keep its RMP under review as required by the Act.</p> <p>With a statement confirming the procedure for reporting the results of the review to the Board, the Keeper should be able to agree that North Ayrshire Integration Joint Board has processes in place to ensure that their records management plan is kept under review as required by the Act.</p>
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 an IJB must utilise the records of other partners and, therefore, information sharing is a key part of its business. In the case of North Ayrshire Integration Joint Board the record of the Board itself are managed by a third party (the Council). For these reasons the Keeper must be satisfied that robust data sharing agreements are in place in that third party.</p> <p>The Keeper has already agreed that the information sharing provision in the Council is appropriate (July 2015).</p> <p>Statements in the <i>Plan</i>, <i>Covering Letter</i> and evidence supplied make it clear that the IJB has robust policies and procedures for info sharing, including Information Sharing agreements. A sample agreement (IJB and Common Service Agency) has been provided in evidence as has the standard agreement between the three Ayrshire Councils and the three IJBs.</p> <p>The Keeper agrees that North Ayrshire Integration Joint Board appropriately considers information governance when planning data sharing with third parties.</p>

15. Public records created or held by third parties	R	R	<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>The <i>Plan</i> is arranged according to the, 14 element, version of the Keeper’s Model Plan which was operational at the time of the original submission (February 2019). In May 2019 the Keeper introduced a 15th “Third Party Contractors” element: https://www.nrscotland.gov.uk/record-keeping/public-records-scotland-act-2011/resources/model-records-management-plan</p> <p>However, it should be noted that the requirement to address the issue of third-party contractors carrying out functions of an authority has always been integral to the Act.</p> <p>No third-parties are contracted to carry out any functions of the North Ayrshire Integration Joint Board.</p>
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North Ayrshire Integration Joint Board
(‘The IJB’ in the assessment below)

Explanation: All public records of the North Ayrshire Integration Joint Board are held on North Ayrshire Council systems and, as this is the case, the IJB must adopt the records management provision of the Council. This is made clear in the *Records Management Plan* (for example page 6) and in a *Covering Letter* from the Chief Executive of North Ayrshire Council.

“It has been identified whilst engaging with the Records Management Plan process that currently all North Ayrshire Integration Joint Board records are held within North Ayrshire Council’s systems and offices.” (*Covering Letter from North Ayrshire Council CEO* – see under General Comments below).

The Keeper agreed the *Records Management Plan* of North Ayrshire Council in July 2015:

<https://www.nrscotland.gov.uk/files//record-keeping/public-records-act/keepers-assessment-report-north-ayrshire.pdf>

In 2017 North Ayrshire Council provided the Keeper with an update on their RMP:

<https://www.nrscotland.gov.uk/files//record-keeping/public-records-act/pur-final-report-for-north-ayrshire-council-and-licensing-board.pdf>

General Notes on submission: This assessment is on the *Records Management Plan* (the *Plan*) of North Ayrshire Integration Joint Board as submitted to the Keeper of the Records of Scotland for his agreement on 25th February 2019.

The submission to the Keeper included the *Plan* a *Covering Letter* from Craig Hatton, Chief Executive of North Ayrshire Council and a separate letter from Stephen Brown, Director Health & Social Care Partnership and Chief Officer of the IJB. These letters support the arrangements detailed in the explanation above.

The introduction to the *Plan* notes that good recordkeeping practices help the IJB 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.

The Keeper fully agrees this introductory statement.

Recommendation: Return: Third Parties, clarification on status for element 9