

Public Records (Scotland) Act 2011

Orkney Integration Joint Board

The Keeper of the Records of Scotland

5th February 2021

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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 Orkney Integration Joint Board by the Public Records (Scotland) Act 2011 Assessment Team following its submission to the Keeper on 4th July 2019.

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

The outcome of the assessment and the Keeper's decision on whether the RMP of Orkney Integration Joint Board complies with the Act can be found under section 7 of this report with relevant recommendations.

3. Authority Background

Orkney Integration Joint Board became legally responsible for the effective delivery of a large range of services within health and social care in April 2016. The membership of the IJB is largely prescribed by the Scottish Government in terms of numbers and the organisations that they represent.

<https://www.orkney.gov.uk/Service-Directory/S/integration-joint-board.htm>

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 Orkney 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:

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

Element	Present	Evidence	Notes
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>Orkney Integration Joint Board (the IJB) has identified Sally Shaw, Chief Officer, as the staff member with corporate responsibility for records management.</p> <p>As well as being the authority's Chief Officer, Ms. Shaw is the IJB's Senior Information Risk Owner (SIRO) and is therefore an entirely appropriate individual to pursue this role.</p> <p>This identification is supported by a <i>Covering Letter</i> from Ms Shaw, dated 3rd July 2019 and by the IJB <i>Records Management Policy</i> (see element 3) page 6.</p> <p>The Chief Officer wrote the foreword to the <i>Records Management Plan</i> (the <i>Plan</i>).</p> <p>The Chief Officer is responsible for reviewing the <i>IJB Records Management Policy</i> (<i>Policy</i> page 8).</p> <p>The Keeper agrees that an appropriate individual has been appointed to take corporate responsibility for records management.</p>
2. Records	G	G	The Act requires that an authority identifies an individual staff member as holding

<p>Manager</p>			<p>operational responsibility for records management who has appropriate corporate responsibility, access to resources and skills.</p> <p>Orkney Integration Joint Board have identified George Vickers, Orkney Council’s Information Governance Officer, as the individual responsible for day-to-day records management in the authority.</p> <p>As recently as 2020, the Keeper has agreed that Mr Vickers is an appropriate individual to assume this role for the Council and as “All Board records are held on IT systems provided by Orkney Islands Council or, in the case of paper records, stored on Council premises.” (<i>Plan</i> page 11) the identification of Mr Vickers to this role is appropriate.</p> <p>The Keeper can therefore agree that Orkney Integration Joint Board have identified an appropriate individual to this role as required by the Act.</p>
<p>3. Policy</p>	<p>G</p>	<p>G</p>	<p>The Act requires an authority to have an appropriate policy statement on records management.</p> <p>The IJB have a <i>Records Management Policy</i> which has been provided to the Keeper and is available to the public at: https://www.orkney.gov.uk/Files/OHAC/Records_Management_Policy_IJB.pdf</p> <p>Screen shots have been provided to show that staff have access to information governance documents through the Council’s intranet portal.</p> <p>The Keeper agrees that the <i>Plan</i> supports the objectives of the <i>Records Management Policy</i>.</p> <p>The Keeper agrees that Orkney Integration Joint Board have a records</p>

			management policy statement as required by the Act.
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 <i>Plan</i> (page 6/7) lists records management principles including that "Records are stored within record keeping systems, rather than in personal filing" and "Records are stored in a consistent manner that reflects the Board's functions"</p> <p>With this in mind the IJB have arranged for their public records to be held on the record keeping system of Orkney Council. This <i>Plan</i> makes this arrangement clear: "All Board records are held on IT systems provided by Orkney Islands Council or, in the case of paper records, stored on Council premises. All staff who manage and have access to Board records are employees of the Council. The Board has therefore decided that it is appropriate to adopt and follow the Council's Policy and Procedures. The Board's staff, the Chief Officer and the Chief Finance Officer, are employees of the Council..." (<i>Plan</i> page 11).</p> <p>Despite the public records being held on Orkney Council systems the IJB have chosen to operate a discrete business classification/retention scheme which is separate from that of the Council. This is to be commended as creating a more robust business tool for the IJB. This has been provided to the Keeper as the <i>Retention and Disposal Schedule</i> and is version 1.0 dated June 2019. The scheme is based on the Scottish Council on Archives SCARRS system which the Keeper has previously endorsed as being suitable for use by a Scottish local authority. The <i>Retention and Disposal Schedule</i> has been signed off by the IJB Chief Officer (see element 1).</p> <p>The <i>Schedule</i> is arranged in a 'functional' system. This arrangement must remain a business decision for the IJB. However, the Keeper would like to acknowledge that</p>

			<p>a functional system like this one is currently considered ‘best practice’.</p> <p>The <i>Retention and Disposal Schedule</i> details record type, retention period, disposal (‘Eventual Fate’), format, authority for retention, notes and whether the record is ‘vital’ (see element 10).</p> <p>Bearing in mind the requirements in the <i>Policy</i> around the use of record systems rather than ‘personal filing’, the <i>Plan</i> (page 9) states: “Some records and documents are held in personal drives and personal email accounts which makes them effectively inaccessible to other officers and means that they are not effectively managed by the Board. To help manage the amount of information held in shared drives and email accounts, the Council’s EDRMS (Electronic Document and Records Management System) Project will make SharePoint available as a repository for records and introduce new procedures, including the automatic deletion of emails for most accounts after a period.” This is a welcome recognition on behalf of the authority and the Keeper commends that this, common, issue is being addressed by Orkney IJB. He looks forward to subsequent updates on progress.</p> <p>The Keeper has determined that the RAG status of the <i>Records Management Plan</i> of an authority whose records are managed on the systems of a separate authority cannot be higher than that awarded to the host authority. Orkney Council is in a transition period and carries an amber status against this element.</p> <p>Therefore he can agree element 4 on the same ‘improvement model’ terms as the Council.</p>
5. Retention schedule	G	G	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

			<p>a Retention Schedule.</p> <p>The <i>Plan</i> (page 6/7) lists records management principles including that "Records are disposed of in accordance with approved Records Retention Schedules". In the Foreword, Chief Officer Sally Shaw (see element 1) states that the <i>Plan</i> will assist the IJB in ensuring "That we do not waste valuable resources storing information which is no longer required is superseded or is duplicated elsewhere."</p> <p>The <i>Records Management Policy</i> (see element 3) correctly identifies that a benefit of effective records management is "Better use of Board facilities as records are retained for no longer than is necessary through use of retention schedules." The Keeper agrees this.</p> <p>The IJB has a combined Business Classification Scheme/Retention Schedule document which has been provided to the Keeper (see element 4 above). The <i>Retention and Disposal Schedule</i> includes identification of "those vital records that would be required for ensuring that the Board can implement its Business Continuity Plans" (Plan page 9 see also element 10).</p> <p>Changes to the retention schedule are processed through the IJB Chief Finance Officer (see element 2). This shows the direct involvement of the authority in retention decisions affecting their information assets and also shows a recognition that a retention schedule is a living document with changes liable to reflect business need.</p> <p>The <i>Retention and Disposal Schedule</i> is located on the Records Management Policy page of the Board's website. Records Management Policy (orkney.gov.uk)</p> <p>The Keeper agrees that Orkney Integration Joint Board has allocated retention decisions to the public records listed in their business classification scheme (see</p>
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			<p>element 4) through a <i>Retention and Disposal Schedule</i> which has been provided to the Keeper and which is publically available.</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>In the Foreword, Chief Officer Sally Shaw (see element 1) states that the <i>Plan</i> will assist the IJB in ensuring “That we do not waste valuable resources storing information which is no longer required is superseded or is duplicated elsewhere.”</p> <p>The <i>Plan</i> states that destruction procedures should be authorised, appropriate, secure and confidential, timely and documented. The Keeper agrees this statement.</p> <p>The Plan also states that the destruction of highly sensitive material is supervised by an appropriate officer. This is to be commended.</p> <p>All IJB Records are held on Orkney Council’s system and therefore the destruction of hard-copy and digital records is carried out in accordance with Council policies.</p> <p>However, the Records Management Plan of Orkney Council has been agreed by the Keeper under ‘improvement model’ terms for element 6. This means that the Council has identified a gap in provision in this element and is working towards closing that gap.</p> <p>The Keeper said, regarding the Council RMP: “The Keeper agrees this element the Council’s <i>Records Management Plan</i> on improvement model terms. This means that the authority has identified a gap in provision (the processes for the destruction of digital records are not universally controlled and a back-log of back-up tapes require destruction), but have put process in place to close that gap. The Keeper’s agreement would be conditional on his being updated</p>

			<p>regarding progress.”</p> <p>Therefore, the Keeper agrees this element of the Orkney Joint Board’s <i>Records Management Plan</i> under the same ‘improvement model’ terms.</p>
<p>7. Archiving and Transfer</p>	<p>G</p>	<p>G</p>	<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 Foreword to the <i>Plan</i> (page 4) from Sally Shaw, Chief Officer (see element 1), notes that archives provide material “for the historians of the future.” and that the IJB has an obligation to “safeguard the historical and archival memory...” The IJB confirms this objective on page 5 where they note that the <i>Plan</i> relates to records that are to be archived and on page 6 where the <i>Plan</i> lists records management principles including that " Records that are identified as of historical significance are preserved".</p> <p>The <i>Records Management Policy</i> (see element 3) supports this listing the “Identification of records of historical value for permanent retention at the earliest possible moment.” As a benefit of robust records management (<i>Policy</i> page 6)</p> <p>The IJB have selected Orkney Library and Archive as the repository for any public records identified for permanent preservation. This is confirmed in the introduction to the <i>Retention and Disposal Schedule</i> (see element 4) page 4 . The Keeper agrees that Orkney Library and Archive is a suitable repository.</p> <p>The <i>Plan</i> makes it clear that the IJB works with the Senior County Archivist in selecting the records that are to be kept permanently for historical purposes (<i>Plan</i> page 10).</p>

			<p>The <i>Retention and Disposal Schedule</i> (see element 4) notes that “Very few records need to be kept forever...” The Keeper agrees this recognition. Those few records will be transferred under the arrangements of the Orkney Library and Archive service. The Keeper has already agreed that these arrangements are appropriate (June 2016).</p> <p>The <i>Plan</i> states (page 11) “Records received in Orkney Archive are documented on an Accession Receipt Form prior to entry in the Archive catalogue.” the Keeper acknowledges that he has received a sample <i>Receipt Form</i> in evidence.</p> <p>The Keeper agrees that Orkney Integration Joint Board has made suitable arrangements to ensure the preservation of those public records selected for permanent retention as required by the Act.</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 <i>Plan</i> (page 6/7) lists records management principles including that " Records are appropriately secured".</p> <p>“All Board records are held on IT systems provided by Orkney Islands Council or, in the case of paper records, stored on Council premises.” (<i>Plan</i> page 11). The IJB has therefore chosen to accept the information security arrangements imposed by the Council. The Keeper agrees this is entirely appropriate.</p> <p>The <i>Plan</i> states that “The Board’s staff, the Chief Officer and the Chief Finance Officer, are employees of the Council, and are already required by their employment contracts to comply with the Council’s Information Security Policy, guidance and procedures.” (<i>Plan</i> page 11). In June 2016 the Keeper agreed that the information security policies and guidance were suitable for protecting the public records of the</p>

			<p>Council. IJB staff are provided with the Council’s security guidance. The Keeper has seen the guidance document <i>Orkney Islands Council Information Security</i> (v2.2, 2015). He agrees that this guidance includes physical security and how to report problems.</p> <p>Screen shots have been provided to show that IJB staff have access to information security documents through the Council’s intranet portal.</p> <p>The Keeper agrees that Orkney Integration Joint Board has arrangements in place to properly ensure the security of their public records as required by the Act.</p>
<p>9. Data Protection</p>	<p>G</p>	<p>G</p>	<p>The Keeper expects a Scottish public authority to manage records involving personal data in compliance with data protection law.</p> <p>In a foreword by the Chief Officer (see element 1) she confirms that the IJB expects the <i>Plan</i> to “help make sure that information is only available to those who need it if that information is personal or sensitive”.</p> <p>The IJB has “decided to adopt and follow the Council’s Data Protection Policy and Data Protection Procedure. 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 and Procedure.” (<i>Plan</i> pages 12/13) https://www.orkney.gov.uk/Council/D/Data-Protection-Policy.htm</p> <p>The Keeper agreed that the data protection arrangements in Orkney Council were fully compliant under the 2018 data protection legislation in his assessment of the Council’s resubmitted <i>Records Management Plan</i> (January 2020).</p> <p>The IJB is registered with the Information Commissioner as a data controller: Registration number ZA207653.</p>

			<p>The IJB has appointed Gavin Mitchell, Head of the Council’s Legal Services as its Data Protection Officer. The Keeper agrees this is an appropriate individual as the public records of the IJB are managed entirely on Council systems.</p> <p>Screen shots have been provided to show that staff have access to information governance documents through the Council’s intranet portal.</p> <p>For data protection training see element 12.</p> <p>The IJB Plan explains the six principles of data protection (page 13).</p> <p>The Keeper agrees that the IJB is aware of its responsibilities under data protection legislation and has put in place the appropriate procedures for protecting the data it creates and processes.</p>
<p>10. Business Continuity and Vital Records</p>	<p>G</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 <i>Plan</i> (page 6/7) lists records management principles including that " Records that are identified as vital are protected".</p> <p>The IJB have provided the Keeper with their Retention and Disposal Schedule (version 1.0 June 2019). This indicates where record types are considered vital to the business of the authority. For example under finance the Annual Report and Accounts are marked as ‘vital’. As the IJB Chief Finance Officer is responsible for the <i>Retention and Disposal Schedule (see element 4)</i> the Keeper can be confident that the IJB is directly involved in the identification of its vital records.</p> <p>Screen shots have been provided to show that staff have access to information</p>

			<p>governance documents through the Council’s intranet portal.</p> <p>“All Board records are held on IT systems provided by Orkney Islands Council or, in the case of paper records, stored on Council premises.” (<i>Plan</i> page 11). The IJB has therefore chosen to accept the record recovery arrangements imposed by the Council. The Keeper agrees this is entirely appropriate.</p> <p>The Keeper agreed that the business continuity arrangements in Orkney Council were appropriate in his agreement of 2016 and in his assessment of the Council’s resubmitted <i>Records Management Plan</i> (January 2020).</p> <p>The Keeper agrees that the Council has access to an approved and operational business continuity process, which is made available to appropriate staff. The recovery plan includes records identified as ‘vital’.</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>In a foreword by the Chief Officer (see element 1) she confirms that the IJB expects the <i>Plan</i> to “provide a firm foundation from which we can make better use of this information” and “help make sure that information is freely available when required”.</p> <p>The <i>Plan</i> (page 6/7) lists records management principles including that " Records are easily accessible for as long as they are required".</p> <p>The records of Orkney IJB (hard-copy and digital) are held on the records management systems of Orkney Council and are therefore tracked using those systems. Orkney Council are currently implementing an eDRMS system. The Keeper acknowledges that the introduction of an EDRMS (and the transfer of existing files into this system as planned) will greatly improve the tracking</p>

			<p>functionality in the Council's record keeping systems. The Council have provided the Keeper with internal updates on the development of this project.</p> <p>Due to the ongoing migration of their systems (see element 4) the Keeper's current agreement with the Council is under improvement model terms for this element.</p> <p>Under this element of the Plan (page 14) the IJB states that "The IJB's records are created by Orkney Islands Council and <u>NHS Orkney</u>". The Keeper notes that the reference to 'NHS Orkney' here is to data provided by that organisation (and covered under their plan) rather than new records <u>created for the IJB</u> by a health board.</p> <p>The Keeper can agree this element of the Orkney Integration Joint Board's <i>Records Management Plan</i> under the same 'improvement model' terms as the 'host' authority.</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 <i>Plan</i> (page 6/7) lists records management principles including that "Records management procedures are understood by all staff and staff are appropriately trained".</p> <p>All staff managing IJB records are required to complete an online information security, data protection and records management courses provided by Orkney Council (<i>Plan</i> page 14).</p> <p>Screen shots have been provided to show that staff have access to information governance documents through the Council's intranet portal.</p>

			<p>The Keeper agrees that Orkney Integration Joint Board considers information governance training for its staff as appropriate.</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 IJB <i>Plan</i> is scheduled for review in the first year of operation (<i>Plan</i> page 15) and thereafter annually (<i>Plan</i> control sheet).</p> <p>The IJB relies on Orkney Council to ensure the review of the systems on which the IJB records are managed.</p> <p>In June 2016 the Keeper agreed that the Council’s review procedures were appropriate under the Act.</p> <p>Any review of the information governance arrangements of the Council and of the <i>Plan</i> are reported to the Health and Care Senior Management Team. The IJB Chief Officer (see element 1) sits on this group.</p> <p>There is a need for ensuring that the standalone documents of the IJB: The <i>Retention and Disposal Schedule</i> (see element 4) is appropriately scheduled for review and update. This is the responsibility of the IJB Finance Officer (see element 2). The <i>Records Management Policy</i> (see element 3) is scheduled to be reviewed annually. This is the responsibility of the Chief Officer (see element 1).</p> <p>As well as agreeing that the Council’s proposals for reviewing their records management plan are appropriate, the Keeper has already agreed that Orkney Council appropriately reviews its records management policy and guidance documents. The IJB relies on many of these, for example the information security suite of guidance.</p>

			<p>The IJB's registration with the Information Commissioner must be renewed by 30 November 2020.</p> <p>The Keeper agrees that Orkney Integration Joint Board has arrangements in place to review their RMP as required by the Act. Furthermore he acknowledges that key information governance documents have appropriate review periods allocated to them.</p>
14. Shared Information	G	G	<p>The Keeper expects a Scottish public authority to ensure that information sharing, both within the Authority and with other bodies or individuals, is necessary, lawful and controlled.</p> <p>The <i>Plan</i> (page 15) recognises this. It states "Confidential corporate records may be shared with the Council, NHS Orkney, the Scottish Government and others."</p> <p>The IJB have provided the Keeper with a sample data sharing agreement among several partners including the IJB. The Keeper agrees that this properly considers information governance issues.</p> <p>The Keeper agrees that Orkney 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>The Keeper expects a public authority to ensure that adequate arrangements are in place for the management of records created and held by third parties who carry out any functions of the authority. This is because 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 acknowledges this in the Plan and states: “In line with the Act, all records created in the carrying out of the Board’s functions (whether directly or by third parties) are public records.” (Plan page 7). Furthermore, in the Records Management Policy (see element 3) the IJB states: “This policy applies to all aspects of Board operations including all staff and those performing a function on behalf of the Board..”</p> <p>However, the Plan states quite clearly that “No third party carries out an IJB function on its behalf.”</p> <p>The Keeper agrees that this element does not apply to this authority.</p>
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Orkney Integration Joint Board
(referred to as ‘the IJB’ in the assessment below)

General Notes on submission: This assessment is on the *Records Management Plan* (the *Plan*) of Orkney Integration Joint Board (the IJB) as submitted to the Keeper of the Records of Scotland (KRS) for his agreement on 14th January 2021. This is version 1.0 approved by the IJB in December 2020.

The *Plan* is accompanied by a *Covering Letter* from Sally Shaw, Chief Officer of the IJB (**see element 1**).

The *Plan* is already available on the IJB’s webpages:

https://www.orkney.gov.uk/Files/OHAC/Records_Management_Plan_IJB.pdf

The IJB acknowledge records as a business asset (for example *Plan* pages 4 and 6 or *Records Management Policy* Policy Statement). The Keeper commends this recognition.

The *Plan* mentions the Act and is based on the Keeper’s, 15 element, Model Plan <http://www.nrscotland.gov.uk/record-keeping/public-records-scotland-act-2011/resources/model-records-management-plan>.

6. Keeper's Summary

Elements **1 - 15** that the Keeper considers should be in a public authority records management plan have been properly considered by Orkney Integration Joint Board. Policies and governance structures are in place to implement the actions required by the plan.

7. Keeper's Determination

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

- The Keeper recommends that Orkney Integration Joint Board should publish its agreed RMP as an example of good practice within the authority and the sector.

This report follows the Keeper's assessment carried out by,



.....
Pete Wadley
Public Records Officer

.....
Hugh Hagan
Senior 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 Orkney Integration Joint Board In agreeing this RMP, the Keeper expects *Orkney 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