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**REPORT TO: MORAY INTEGRATION JOINT BOARD ON 29 SEPTEMBER 2022**

**SUBJECT: RECORDS MANAGEMENT PLAN PROGRESS UPDATE REPORT**

**BY: RECORDS AND HERITAGE MANAGER AND DATA PROTECTION OFFICER.**

## **1. REASON FOR REPORT**

1.1. To inform the Board of the Progress Update Review (PUR) invitation and acknowledge the updated Elements of the Board's Records Management Plan (RMP). These updated Elements will be submitted to the Keeper, National Records of Scotland (NRS), before the 31 October 2022 deadline.

## **2. RECOMMENDATION**

**2.1. It is recommended that the Moray Integration Joint Board (MIJB):**

- i) considers the updated Elements; and**
- ii) approves them for submission to NRS.**

## **3. BACKGROUND**

3.1. The Public Records (Scotland) Act 2011 (PRSA) compels organisations to submit a Records Management Plan (RMP) to The Keeper, NRS. The first RMP was approved for submission at the 29 November 2018 meeting (para 13 refers) and submitted by MIJB in December 2018. An interim report was received in March 2019 requesting some minor amendments and the RMP was then approved in May 2019.

3.2. The MIJB's 2019 RMP covers 14 Elements and states that 10 elements are covered by Moray Council's RMP. The remaining 4 Elements are:

- Element 1: Senior Management Responsibility
- Element 9: Data Protection
- Element 13: Assessment and Review
- Element 14: Shared Information

3.3. Another Element has since been added:

- Element 15: Public Records Created by third parties.

- 3.4. Since 2019 the Senior Management of the MIJB has changed, this Element should be updated.
- 3.5. Since 2019 further Data Protection training has been undertaken and more Data Protection Guidance has been produced. Element 9 can be updated to reflect this.
- 3.6. Element 13 has previously not been fully completed. Information Commissioner's Officer (ICO) registration is current and Data Protection training was refreshed summer 2022. However, the annual report has not been received by the Board due to complications from the Covid-19 pandemic as well as the workload pressures on the Records & Heritage Manager and Data Protection Officer. A report will be produced at the end of the calendar year.
- 3.7. Element 14 focuses on shared information, this element does not need updating as there is an existing Data Sharing Agreement in place between the MIJB and its partners – the Moray Council and NHS Grampian. All new data sharing agreements should be highlighted to the Information Governance Team before completion. It is anticipated that most new agreements would be completed either by the Council or NHS, not directly by the Board.
- 3.8. The new Element 15 should be included in the PUR. It is anticipated that no information is held as the Board does not currently utilise any 3<sup>rd</sup> parties, instead having partnerships with the Council and NHS who are already required to comply with the PRSA and their own RMPs.

#### **4. KEY MATTERS RELEVANT TO RECOMMENDATION**

- 4.1. Moray Council last submitted an updated RMP in January 2020, however, due to the knock on effects of the Covid-19 pandemic NRS have only recently completed their initial report. This report highlights areas of improvement that are needed by the Council. Work to address these elements is currently in progress.

#### **5. SUMMARY OF IMPLICATIONS**

**(a) Corporate Plan and 10 Year Plan (Local Outcomes Improvement Plan (LOIP)) and Moray Integration Joint Board Strategic Plan “Moray Partners in Care 2019 – 2029”**

Information underpins the Board's over-arching strategic objectives and helps it meet its strategic outcomes. Its information supports it to:

- Demonstrate accountability.
- Provide evidence of actions and decisions.
- Assist with the smooth running of business.
- Help build organisational knowledge.

**(b) Policy and Legal**

The Records Management Plan will fulfil our statutory requirements set out in Part 1 of the Public Records (Scotland) Act 2011.

- (c) Financial implications**  
None
- (d) Risk Implications and Mitigation**  
Risk to Information Management and Security if RMP is not adhered to.
- (e) Staffing Implications**  
Strain on the DPO's workload.
- (f) Property**  
None
- (g) Equalities/Socio Economic Impact**  
An Equality Impact Assessment is not required as the report does not deal with actions which may impact adversely on groups with protected characteristics.
- (h) Climate Change and Biodiversity Impacts**  
None
- (i) Directions**  
None
- (j) Consultations**  
Consultation on this report has taken place with the following staff/groups who are in agreement with the content in relation to their area of responsibility:  
  
Council's Information Assurance Group and Isla Whyte, Support Manager, Health and Social Care Moray

## **6. CONCLUSION**

- 6.1. The Board will note the requirements to maintain a RMP, acknowledge the progress and changes that have occurred since the first RMP submission, and, endorse the Records & Heritage Manager to complete the Board's RMP PUR to reflect the changes outlined above. This will be submitted to the NRS before the October deadline.**

Author of Report: Alison Morris, Records and Heritage Manager and DPO  
Background Papers:  
Ref: