



SBAR – East Lothian Integration Joint Board Records Management Plan

Date: 25th August 20212
Completed by: Paul Currie
Area: Strategic Integration

Situation	To meet statutory requirements, East Lothian Integration Joint Board is required to develop an agreed 'Records Management Plan' (RMP) for certain documents it produces.
Background	<p>The Public Records (Scotland) Act 2011 (the Act¹) requires 'public authorities' to submit a Records Management Plan for agreement by the Keeper of the Records of Scotland.</p> <p>Following establishment of Integration Joint Boards under the Public Bodies (Joint Working) (Scotland) Act 2014, a requirement was placed on IJBs (as new public authorities) to each prepare a Records Management Plan, as described above, for approval by the Keeper of Records.</p> <p>The IJB records covered under RMP requirements are defined as:</p> <ul style="list-style-type: none"> • Agendas and papers for IJB meetings and related committees, including documentation concerning Directions, and records of Audit and Risk Committee and Strategic Planning Group meetings. • IJB Strategies and Policies, including the Annual Report, Strategic Plan and Delivery Plan. <p>The RMP for East Lothian IJB (appendix 1) sets out how the IJB's public records will be managed and stored. The RMP awaits approval by the IJB in order to be submitted to the Keeper by the deadline of 31st August 2022. Review of the RMP will be carried out annually on behalf of the IJB.</p> <p>East Lothian Council (ELC) is the web-host for online publication of the public proceedings of the Integration Joint Board and its agendas, minutes and meeting papers as well as those of the Strategic Planning Group. ELC has an in-house records management service, including an off-site central secure Records Centre for all semi-current paper records generated across the Council.</p> <p>ELC Information Governance has agreed to manage and store, using the Council's facilities and expertise, those records covered by the IJB Records Management Plan.</p>
Assessment	<p>It is essential that the East Lothian Integration Joint Board has an approved 'Records Management Plan' (RMP) for certain documents it produces.</p> <p>East Lothian Council Information Governance will manage and store East Lothian IJB records to a high standard in line with the Records Management Plan and an associated Memorandum of Understanding (appendix 2).</p> <p>The RMP needs to be approved by East Lothian IJB before submission to the Keeper of Records by 31st August 2022.</p>
Recommendation	The IJB is asked to approve the East Lothian Integration Joint Board Records Management Plan and associated Memorandum of Understanding.
Further Information	¹ http://www.nas.gov.uk/recordKeeping/publicRecordsActIntroduction.asp



East Lothian Integration Joint Board Records Management Plan

Submitted in accordance with the Public Records (Scotland) Act 2011

This Records Management Plan is fully endorsed by East Lothian Integration Joint Board. The Chief Officer will ensure compliance with the Public Records (Scotland) Act 2011 through the corporate implementation of this plan.

Signed by:

Fiona Wilson, Chief Officer, East Lothian Integration Joint Board

Document Control Information

Revision	Date	Revision Description
0.1	27/07/2021	Draft created by C Cockburn
0.2	29/07/2021	Comments by ELC Team Manager-Information Governance
0.3	18/05/2022	Draft version submitted by Hannah Gray to Senior Accountable Officer – A MacDonald
0.4	16/08/2022	Final draft submitted by C Cockburn to Senior Accountable Officer – Fiona Wilson
1.0	25/08/2022	Final version approved by ELHSCP IJB

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Records Management Plan

Summary

This Records Management Plan (RMP) conforms to the model Records Management Plan as set out by the Keeper of the Records of Scotland, in accordance with the provisions of the Public Records (Scotland) Act 2011. This RMP covers East Lothian Integration Joint Board, referred to as 'the IJB' throughout.

The RMP outlines and evidence both the IJB's and East Lothian Council's policies and procedures regarding the creation, use, management and disposal of the public records it creates and uses in pursuance of its statutory functions.

In line with the model plan, the IJB's RMP addresses 14 elements:

- Element 1: Senior management responsibility
- Element 2: Records manager responsibility
- Element 3: Records management policy statement
- Element 4: Business classification
- Element 5: Retention schedule
- Element 6: Destruction arrangements
- Element 7: Archiving and transfer arrangements
- Element 8: Information security
- Element 9: Data protection
- Element 10: Business continuity and vital records
- Element 11: Audit trail
- Element 12: Competency framework for records management staff
- Element 13: Assessment and review
- Element 14: Shared Information

The IJB is fully committed to compliance with the requirements of the Public Records (Scotland) Act 2011 which came into force on the 1st of January 2016. The IJB will therefore follow procedures that aim to ensure that all of its officers, employees of constituent authorities supporting its work, contractors, agents, consultants and other trusted third parties who create public records on behalf of the authority, or manage public records held by the authority, are fully aware of and abide by this plan's arrangements.

About the Public Records (Scotland) Act 2011

The Public Records (Scotland) Act 2011 (the Act - www.nas.gov.uk/recordKeeping/publicRecordsActIntroduction.asp) came fully into force in January 2013. The Act requires public authorities to submit a Records Management Plan (RMP) to be agreed by the Keeper of the Records of Scotland. Integration Joint Boards were added to the Act's schedule by the Public Bodies (Joint Working) (Scotland) Act 2014. This document is the Records Management Plan of East Lothian Integration Joint Board.

This RMP sets out and evidences proper arrangements for the management of the IJB's public records and is submitted for agreement by the Keeper of the Records of Scotland under Section 1 of the Public Records (Scotland) Act 2011. It will be reviewed by the IJB annually.

<http://www.nas.gov.uk/recordKeeping/publicRecordsActIntroduction.asp>

<http://www.scottish.parliament.uk/parliamentarybusiness/Bills/22476.aspx>

About Integration Joint Boards

The integration of health and social care is part of the Scottish Government's programme of reform to improve care and support for those who use health and social care services. It is one of the Scottish Government's top priorities.

The Public Bodies (Joint Working) (Scotland) Act 2014 provides the legislative framework for the integration of health and social care services in Scotland. It has established:

- Nationally agreed outcomes, applying across health and social care, in service planning by Integration Joint Boards and service delivery by Health and Social Care Partnerships, NHS Boards and Local Authorities.
- A requirement on NHS Boards and Local Authorities to integrate health and social care budgets.
- A requirement on Health and Social Care Partnerships to strengthen the role of clinicians and care professionals, along with the third and independent sectors, in the planning and delivery of services.

About East Lothian Integration Joint Board

The East Lothian Integration Scheme received Royal Assent on 27th June 2015 and the IJB was formally established on 20th August 2015.

From 1st April 2016 East Lothian IJB became responsible for the planning and oversight of delivery of health and social care functions delegated to it by NHS Lothian and East Lothian Council.

These include adult social care services, criminal justice services, adult health community health services and some hospital services. The area covered by East Lothian IJB is coterminous with the East Lothian Local Authority.

The IJB operates as a body corporate (a separate legal entity), acting independently of NHS Lothian and East Lothian Council. The IJB consists of six voting members appointed in equal number by NHS Lothian and East Lothian Council, with a number of representative members who are drawn from the third sector, independent sector, staff, carers and service users. The IJB is advised by a number of professionals including the Chief Officer, Clinical Director, Chief Nurse and Chief Social Work Officer.

The IJB's key functions are to:

- Prepare a Strategic Plan for integrated functions that is in accordance with national and local outcomes and integration principles.
- Allocate the integrated budget in accordance with the Strategic Plan.
- Oversee the delivery of services that are within the scope of the Partnership.
- Information underpins the IJB's over-arching strategic objective and helps it meet its strategic outcomes and supports it to:
 - Demonstrate accountability.
 - Provide evidence of actions and decisions.
 - Assist with the smooth running of business.
 - Help build organisational knowledge.
 - Good record keeping practices lead to greater productivity as less time is taken to locate information. Well managed records will 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.

In addition, public services are more accountable to the public now than ever before through the increased awareness of openness and transparency within government. Knowledge and information management is now formally recognised as a function of government similar to finance, IT and communications. It is expected that the IJB is fully committed to creating, managing, disclosing, protecting and disposing of information effectively and legally.

Records Management Plan Review

Section 5 (1) of the Act requires authorities to keep their plans under review to ensure its arrangements remain fit for purpose.

RMP Principles

What does the Records Management Plan cover?

Records management covers records of all formats and media. This includes paper and computer records, cassette, video and CD records. Records management is needed throughout the lifecycle of a record, and the process begins when the decision to create the record is taken.

Why is records management important?

Records are vital for the effective functioning of the IJB: they support decision making; document its aims, policies and activities; and ensure that legal, administrative and audit requirements are met.

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.

Records management principles

Security: Records will be secure from unauthorised or inadvertent alteration or erasure. 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.

Accountability: Adequate records are maintained to account fully and transparently for all actions and decisions in particular:

- To protect legal and other rights of staff or those affected by those actions
- To facilitate audit or examination
- To provide credible and authoritative evidence

Quality: Records are complete and accurate and the information they contain is reliable and its authenticity can be guaranteed.

Accessibility: 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.

Retention and Disposal: There are consistent and documented retention and disposal procedures, including provision for permanent preservation of archival records.

Training: All staff are informed of their record-keeping responsibilities through appropriate training and guidance and if required, further support as necessary.

East Lothian IJB Records Management Plan

The context of this plan is that most records including employment, service user and internal policies and procedures will continue to be managed in the parent body organisations, i.e., East Lothian Council and NHS Lothian and as such will be covered by their respective record management plans.

As such, this RMP concerns the IJB business in terms of:

- IJB Meetings and related committees - agendas and papers, including Directions, Audit and Risk Committee and Strategic Planning
- IJB Strategies and Policies, including the Annual Report, Strategic Plan and Delivery Plan.

All of this information is already in the public domain via the IJB's pages on East Lothian Council's website via the following links:

https://www.eastlothian.gov.uk/info/210558/social_care_and_health/12236/integrating_health_and_social_care_in_east_lothian/11

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https://www.eastlothian.gov.uk/info/210558/social_care_and_health/12236/integrating_health_and_social_care_in_east_lothian/5

The IJB has agreed with East Lothian Council that all the IJB's records will be managed by East Lothian Council. The Council operates an in-house records management service, including an off-site Records Centre and associated overflow stores. The Records Centre acts as a central secure store for all semi-current paper records generated across the Council. Any of the records covered by the IJB RMP for example, records relating to the IJB committees plan and procedures have been and will be stored in paper format.

It provides a weekly file retrieval and return service. In addition, the Council's Archives collections are stored in a dedicated strongroom with appropriate security and environmental controls, located in the John Gray Centre, Haddington.

The East Lothian IJB Records Management Plan (RMP) is effective from 26th August 2022.

RMP Element Description	East Lothian Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p>Element 1: Senior management responsibility:</p> <p>Section 1(2)(a)(i) of the Act specifically requires a RMP to identify the individual responsible for the management of the authority's public records. An authority's RMP <u>must</u> name and provide the job title of the senior manager who accepts overall responsibility for the RMP that has been submitted.</p> <p>It is vital that the RMP submitted by an authority has the approval and support of that authority's senior management team. Where an authority has already appointed a Senior Information Risk Owner, or similar person, they should consider making that person responsible for the records management programme. It is essential that the authority identifies and seeks the agreement of a senior post-holder to take overall responsibility for records management. That person is unlikely to have a day-to-day role in implementing the RMP, although they are not prohibited from doing so.</p> <p>As evidence, the RMP could include, for example, a covering letter signed by the senior post-holder. In this letter the responsible person named should indicate that they endorse the authority's record management policy (See Element 3).</p> <p>Read further explanation and guidance about element 1 - Model Records Management Plan National Records of Scotland (nrscotland.gov.uk)</p>	<p>The Chief Officer, Fiona Wilson has senior responsibility for all aspects of the IJB's Records Management and is the corporate owner of this document.</p> <p>The Chief Officer is also the IJB's Senior Information Risk Owner (SIRO).</p> <p>The Chief Officer Chairs the Joint Management Team, which has strategic responsibility for the Health and Social Care Partnership.</p>	<p>HSCP Director Job Outline -050219.docx</p> <p>The ELC Beginners Guide to Information Asset Registers</p> <p>Senior Information Risk Owner (SIRO): the SIRO has overall strategic responsibility for governance in relation to data protection risks. The SIRO:</p> <ul style="list-style-type: none"> • Provides written advice to the Chief Finance Officer for the Annual Governance Statement relating to information risk; • Drives cultural change regarding information risks in a realistic and effective manner; • Oversees the reporting and management of information incidents; • In liaison with the Chief Executive and the Depute Chiefs, ensures the Information Asset Owner and Information Asset Administrator roles are in place to support the SIRO role. These roles will be put in place in future. At this time the Element 1 Officer/SIRO will have reference to East Lothian Council guidance on the IAO and IAA roles which have been included as evidence. 	<p>What further development, if any, remains to be undertaken to bring this element into full compliance?</p> <p>If any changes to Senior Manager Accountability and SIRO NRS will be updated accordingly.</p> <p>The additional roles IAO/IAA will be developed with the supervision of the Element 1/SIRO.</p>

RMP Element Description	East Lothian Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p>Element 2: Records manager responsibility:</p> <p>Section 1(2) (a)(ii) of the Act specifically requires a RMP to identify the individual responsible for ensuring the authority complies with its plan. An authority's RMP <u>must</u> name and provide the job title of the person responsible for the day-to-day operation of activities described in the elements in the authority's RMP. This person should be the Keeper's initial point of contact for records management issues. It is essential that an individual has overall day-to-day responsibility for the <u>implementation</u> of an authority's RMP. There may already be a designated person who carries out this role. If not, the authority will need to make an appointment. As with element 1 above, the RMP must name an individual rather than simply a job title. It should be noted that staff changes will not invalidate any submitted plan provided that the all-records management responsibilities are transferred to the incoming post holder and relevant training is undertaken. This individual might not work directly for the scheduled authority. It is possible that an authority may contract out their records management service. If this is the case an authority may not be in a position to provide the name of those responsible for the day-to-day operation of this element. The authority must give details of the arrangements in place and name the body appointed to carry out the records management function on its behalf. It may be the case that an authority's records management programme has been developed by a third party. It is the person operating the programme on a day-to-day basis whose name should be submitted.</p> <p>Read further explanation and guidance about element 2 - https://www.nrscotland.gov.uk/files//record-keeping/public-records-act/ModelPlan.pdf</p>	<p>The Operational Officers responsible for records management are:</p> <p>NHS Lothian Catriona Cockburn Business Operational Manager</p> <p>Access to IJB's records is currently managed by East Lothian Council's Committee Team. Changes are implemented in line with the instructions by the Element 2 Officer.</p> <p>The ELC Committee Team are able to access and manage IJB information on a daily basis</p> <p>Responsibilities include:</p> <ul style="list-style-type: none"> Managing the IJB's records; Reviewing and implementing operational policies and procedures in line with the RMP; Ensuring relevant health and social care staff have records management training. In addition any East Lothian Council employee including the Committee Team staff are provided with Records Management Training as set out in the ELC Records Management Plan. 	<p>The current element 2 nominee is a temporary role and following the filling of vacancies a new element 2 nominated individual will be advised.</p> <p>In the interim the current element 2 officer named here will seek advice and guidance from the East Lothian Council Element 2 Officer Zarya Rathe as required.</p> <p>The ELIJB MoU sets out that the IJB's records are created and managed by the partner body, East Lothian Council. It indicates that the CO is satisfied that the partner body has appropriate records management arrangements in place.</p> <p>The MoU confirms that the partner authority, East Lothian Council creates, holds and manages into disposal all the IJB's records</p>	<p>What further development, if any, remains to be undertaken to bring this element into full compliance?</p> <p>If there are any updates, NRS will be updated accordingly.</p> <p>The long-term Element 2 Officer will be confirmed following the filling of vacancies.</p>

RMP Element Description	East Lothian Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p>Element 3: Records management policy statement:</p> <p>The Keeper expects each authority's plan to include a records management policy statement. The policy statement should describe how the authority creates and manages authentic, reliable and useable records, capable of supporting business functions and activities for as long as they are required. The policy statement should be made available to all staff, at all levels in the authority. The statement will properly reflect the business functions of the public authority. The Keeper will expect authorities with a wide range of functions operating in a complex legislative environment to develop a fuller statement than a smaller authority. The records management statement should define the legislative, regulatory and best practice framework, within which the authority operates and give an overview of the records management processes and systems within the authority and describe how these support the authority in carrying out its business effectively. For electronic records the statement should describe how metadata is created and maintained. It should be clear that the authority understands what is required to operate an effective records management system which embraces records in all formats.</p> <p>The records management statement should include a description of the mechanism for records management issues being disseminated through the authority and confirmation that regular reporting on these issues is made to the main governance bodies. The statement should have senior management approval and evidence, such as a minute of the management board recording its approval, submitted to the Keeper. The other elements in the RMP, listed below, will help provide the Keeper with evidence that the authority is fulfilling its policy.</p> <p>Read further explanation and guidance about element 3 - https://www.nrscotland.gov.uk/files//record-keeping/public-records-act/ModelPlan.pdf</p>	<p>East Lothian IJB is responsible for setting strategic priorities for and planning of health and care services for the East Lothian population which are delivered through the East Lothian Health and Social Care Partnership and hosted by set-aside services.</p> <p>The context of this plan is that most records including employment, service user and internal policies and procedures will continue to be managed in the parent body organisations, i.e., East Lothian Council and NHS Lothian and as such will be covered by their respective record management plans/retention schedules.</p> <p>The records covered by this plan constitute IJB business in terms of:</p> <ul style="list-style-type: none"> • IJB Meetings- agendas and papers, including Directions • IJB Strategies and Policies, including the Annual Report, Strategic Plan and Delivery Plan <p>All of this information is already in the public domain via the IJB's pages on East Lothian Council's website. Business meetings if the IJB are where possible held in public. During recent months of restrictions in face-face meetings, the IJB has held live online meetings with video recordings of these available to the public afterwards.</p> <p>https://www.eastlothian.gov.uk/info/2/10558/social_care_and_health/12236/integrating_health_and_social_care_in_east_lothian/11</p> <p>-</p> <p>https://www.eastlothian.gov.uk/info/2/10558/social_care_and_health/12236/integrating_health_and_social_care_in_east_lothian/5</p>	<p>Because IJB records are stored on East Lothian Council Systems they are covered by East Lothian Records Management Policies.</p> <ul style="list-style-type: none"> • Information and Records Management Policy <p>A MoU is part of the IJB Records Management Plan.</p> <ul style="list-style-type: none"> • ELC – IJB MoU v 0.1 	<p>What further development, if any, remains to be undertaken to bring this element into full compliance?</p> <p>If there are any updates, NRS will be updated accordingly.</p>

RMP Element Description	East Lothian Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p>Element 4: Business classification</p> <p>The Keeper expects an authority to have properly considered business classification mechanisms and its RMP should therefore reflect the functions of the authority by means of a business classification scheme or similar.</p> <p>A business classification scheme usually takes the form of a hierarchical model or structure diagram. It records, at a given point in time, the informational assets the business creates and maintains, and in which function or service area they are held. As authorities change the scheme should be regularly reviewed and updated.</p> <p>A business classification scheme allows an authority to map its functions and provides a structure for operating a disposal schedule effectively.</p> <p>Some authorities will have completed this exercise already, but others may not. Creating the first business classification scheme can be a time-consuming process, particularly if an authority is complex, as it involves an information audit to be undertaken. It will necessarily involve the cooperation and collaboration of several colleagues and management within the authority, but without it the authority cannot show that it has a full understanding or effective control of the information it keeps.</p> <p>Although each authority is managed uniquely there is an opportunity for colleagues, particularly within the same sector, to share knowledge and experience to prevent duplication of effort.</p> <p>All of the records an authority creates should be managed within a single business classification scheme, even if it is using more than one record system to manage its records. An authority will need to demonstrate that its business classification scheme can be applied to the record systems which it operates.</p> <p>Read further explanation and guidance about element 4 - https://www.nrscotland.gov.uk/files/record-keeping/public-records-act/ModelPlan.pdf</p>	<p>As the IJB has only been in operation since 1st April 2016, the type and volume of record keeping specific to the IJB is evolving rapidly.</p> <p>The IJB will follow the corporate Business Classification Scheme (BCS) adopted by East Lothian Council which identifies its high-level functions and activities. These functions cut across the divisional structures of the Council, enabling the BCS to remain relevant in the event of structural changes to the organisation. East Lothian Council's BCS has been updated to include IJB records.</p> <p>The BCS is a localised version of the model BCS published by the Scottish Council on Archives for use by all Scottish local authorities.</p> <p>IJB records are part of the Committee Management System and as such have permanent retention status.</p>	<p>The link to East Lothian Council's BCS Policy Document is on page 10 of its Record Management Plan.:</p> <p>https://www.eastlothian.gov.uk/info/210598/access_to_information/12300/access_to_information/3</p> <p>https://www.eastlothian.gov.uk/downloads/file/27302/business_classification_schemeretention_schedule</p> <p>A Screenshot of the IJB's file plan accompanies this document. This demonstrates where the IJB's records sit within East Lothian Council's Business Classification Scheme.</p>	<p>What further development, if any, remains to be undertaken to bring this element into full compliance?</p> <p>If there are any updates, NRS will be updated accordingly.</p>

RMP Element Description	East Lothian Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p>Element 5: Retention schedules</p> <p>Section 1(2) (b)(iii) of the Act specifically requires a RMP to include provision about the archiving and destruction or other disposal of the authority's public records.</p> <p>An authority's RMP <u>must</u> demonstrate the existence of and adherence to corporate records retention procedures. The procedures should incorporate retention schedules and should detail the procedures that the authority follows to ensure records are routinely assigned disposal dates, that they are subsequently destroyed by a secure mechanism (see element 6) at the appropriate time or preserved permanently by transfer to an approved repository or digital preservation programme (See element 7).</p> <p>The principal reasons for creating retention schedules are:</p> <ul style="list-style-type: none"> • to ensure records are kept for as long as they are needed and then disposed of appropriately • to ensure all legitimate considerations and future uses are considered in reaching the final decision. • to provide clarity as to which records are still held by an authority and which have been deliberately destroyed. <p>"Disposal" in this context does not necessarily mean destruction. It includes any action taken at the agreed disposal or review date including migration to another format and transfer to a permanent archive.</p> <p>A retention schedule is an important tool for proper records management. Authorities who do not yet have a full retention schedule in place should show evidence that the importance of such a schedule is acknowledged by the senior person responsible for records management in an authority (see element 1). This might be done as part of the policy document (element 3). It should also be made clear that the authority has a retention schedule in development.</p> <p>An authority's RMP <u>must</u> demonstrate the principle that retention rules are consistently applied across all of an authority's record systems.</p> <p>Read further explanation and guidance about element 5 - https://www.nrscotland.gov.uk/files//record-keeping/public-records-act/ModelPlan.pdf</p>	<p>A retention schedule is a list of records for which pre-determined disposal dates have been established.</p> <p>The IJB must, however, be able to demonstrate it remains responsible for its records under the partner body schedule. It must be able to demonstrate that disposal periods set against its records under the partner schedule were taken by the Board, in collaboration with the partner body. The partner bodies retention policies and procedures (and records manager(s)) will assist the IJB in making business-based disposal decisions against its records. The IJB's statutory obligations will be taken into consideration in reaching any decision.</p> <p>The corporate records including formal IJB reports, and minutes will be managed in accordance with the ELC Servicing Committee Protocol.</p> <p>As the records created by the IJB and managed by NHS Lothian and East Lothian Council, the IJB will follow what is agreed and in place within each Partner Body.</p> <p>IJB will be abiding by the rules within the East Lothian Council retention schedules, for clarity all IJB Records under this RMP will be retained permanently.</p>	<p>East Lothian Council's Corporate Retention Schedule:</p> <p>East Lothian Council Business Classification Scheme and record retention schedule.</p>	<p>What further development, if any, remains to be undertaken to bring this element into full compliance?</p> <p>If there are any updates, NRS will be updated accordingly</p>

RMP Element Description	East Lothian Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p>Element 6: Destruction arrangements</p> <p>Section 1(2) (b)(iii) of the Act specifically requires a RMP to include provision about the archiving and destruction, or other disposal, of an authority's public records.</p> <p>An authority's RMP <u>must</u> demonstrate that proper destruction arrangements are in place.</p> <p>A retention schedule, on its own, will not be considered adequate proof of disposal for the Keeper to agree a RMP. It must be linked with details of an authority's destruction arrangements. These should demonstrate security precautions appropriate to the sensitivity of the records. Disposal arrangements must also ensure that all copies of a record – wherever stored – are identified and destroyed.</p> <p>Read further explanation and guidance about element 6 - https://www.nrscotland.gov.uk/files//record-keeping/public-records-act/ModelPlan.pdf</p>	<p>It is not always cost-effective or practical for an authority to securely destroy records inhouse. Many authorities engage a contractor to destroy records and ensure the process is supervised and documented.</p> <p>As such, the destruction of IJB records, in all formats, will be undertaken by East Lothian Council.</p> <p>All IJB Records will be held electronically on East Lothian Council's system so no hard copies will require destruction.</p> <p>Electronic destruction procedures within East Lothian Council are currently under review, however documentation that evidences the security of our electronic destructions can be provided.</p> <p>The majority of IJB records (with the exception of minor drafts/records) will be retained permanently and therefore transferred to the Council Archives – see Element 7-Archiving and Transfer arrangements)</p> <p>At this stage there is only a limited volume of records specific to the IJB.</p>	<p>East Lothian Council's Records Management Plan</p>	<p>What further development, if any, remains to be undertaken to bring this element into full compliance.</p> <p>If there are any updates, NRS will be updated accordingly.</p> <p>Destruction Arrangements for the IJB will be updated in line with changes and development to East Lothian Council's provision for Records Destruction.</p>

RMP Element Description	East Lothian Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p>Element 7: Archiving and transfer arrangements</p> <p>Section 1(2)(b)(iii) of the Act specifically requires a RMP to make provision about the archiving and destruction, or other disposal, of an authority's public records.</p> <p>An authority's RMP must detail its archiving and transfer arrangements and ensure that records of enduring value are deposited in an appropriate archive repository. The RMP will detail how custody of the records will transfer from the operational side of the authority to either an in-house archive, if that facility exists, or another suitable repository, which must be named. The person responsible for the archive should also be cited.</p> <p>Some records continue to have value beyond their active business use and may be selected for permanent preservation. The authority's RMP must show that it has a mechanism in place for dealing with records identified as being suitable for permanent preservation. This mechanism will be informed by the authority's retention schedule which should identify records of enduring corporate and legal value. An authority should also consider how records of historical; cultural and research value will be identified if this has not already been done in the retention schedule. The format/media in which they are to be permanently maintained should be noted as this will determine the appropriate management regime</p> <p>Read further explanation and guidance about element 7 - https://www.nrscotland.gov.uk/files//record-keeping/public-records-act/ModelPlan.pdf</p>	<p>All IJB Records will be held electronically on East Lothian Council's system so no hard copies will be archived.</p> <p>Electronic archiving policies will be determined at a later date. At this stage there is only a limited volume of records specific to the IJB.</p> <p>Further work is needed to develop Digital preservation capabilities at East Lothian Council.</p>	<p>The ELC – IJB MoU references records management arrangements.</p> <p>East Lothian Council Records Management Plan</p>	<p>What further development, if any, remains to be undertaken to bring this element into full compliance</p> <p>If there are any updates, NRS will be updated accordingly.</p> <p>Work is ongoing at East Lothian Council to develop more robust policies and procedures regarding Digital preservation.</p>

RMP Element Description	East Lothian Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p>Element 8: Information Security</p> <p>Section 1(2) (b)(ii) of the Act specifically requires a RMP to make provision about the archiving and destruction or other disposal of the authority's public records.</p> <p>An authority's RMP <u>must</u> make provision for the proper level of security for its public records.</p> <p>All public authorities produce records that are sensitive. An authority's RMP <u>must</u> therefore include evidence that the authority has procedures in place to adequately protect its records. Information security procedures would normally acknowledge data protection and freedom of information obligations as well as any specific legislation or regulatory framework that may apply to the retention and security of records.</p> <p>The security procedures <u>must</u> put in place adequate controls to prevent unauthorised access, destruction, alteration or removal of records. The procedures will allocate information security responsibilities within the authority to ensure organisational accountability and will also outline the mechanism by which appropriate security classifications are linked to its business classification scheme.</p> <p>Read further explanation and guidance about element 8 - https://www.nrscotland.gov.uk/files//record-keeping/public-records-act/ModelPlan.pdf</p>	<p>Information security is the process by which an authority protects its records and ensures they remain available. It is the means by which an authority guards against unauthorised access and provides for the integrity of the records. Robust information security measures are an acknowledgement that records represent a risk as well as an asset. A public authority should have procedures in place to assess and contain that risk.</p> <p>The IJB records will be subject to East Lothian Council policies, procedures and arrangements in information security.</p> <p>All staff will remain employees of either NHS Lothian or East Lothian Council. As such they will be subject to the code of conduct of their employer.</p>	<p>East Lothian IT Acceptable Use Policy</p> <p>ELC Records Management Plan</p> <p>East Lothian Council Information Governance and Security Forum: has not met since Covid business continuity measures were initiated in March 2020, and work remains to refresh the list of Information Champions and re-commence meetings.</p>	<p>What further development, if any, remains to be undertaken to bring this element into full compliance</p> <p>If there are any updates, NRS will be updated accordingly.</p> <p>Inclusion of the IJB on the Information Governance and Security Forum when restarted.</p>

RMP Element Description	East Lothian Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p>Element 9: Data protection</p> <p>The Keeper will expect an authority's RMP to indicate compliance with its data protection obligations. This might be a high-level statement of public responsibility and fair processing.</p> <p>If an authority holds and process information about stakeholders, clients, employees or suppliers, it is legally obliged to protect that information. Under the Data Protection Act, an authority must only collect information needed for a specific business purpose, it must keep it secure and ensure it remains relevant and up to date. The authority <u>must</u> also only hold as much information as is needed for business purposes and only for as long as it is needed. The person who is the subject of the information <u>must</u> be afforded access to it on request.</p> <p>Read further explanation and guidance about element 9 - https://www.nrscotland.gov.uk/files//record-keeping/public-records-act/ModelPlan.pdf</p>	<p>The Information Commissioner has confirmed that the IJB can be a data controller albeit that it will not hold any personal records of service users/patients.</p> <p>The IJB RMP will be referring to the ELC Policies, Procedures and Guidance regarding the Data Protection Act 2018 and the UK GDPR.</p>	<p>The IJB ICO Registration details are ZA259857</p> <p>A series of guidance documents issued to all staff by East Lothian Council regarding Data Protection have been provided.</p> <p>East Lothian Council's Data Protection Policy is made available to all staff via the Council's Intranet</p>	<p>What further development, if any, remains to be undertaken to bring this element into full compliance.</p> <p>If there are any updates, NRS will be updated accordingly.</p>

RMP Element Description	East Lothian Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p>Element 10: Business continuity and vital records</p> <p>The Keeper will expect an authority's RMP to indicate arrangements in support of records vital to business continuity. Certain records held by authorities are vital to their function. These might include insurance details, current contract information, master personnel files, case files, etc. The RMP will support reasonable procedures for these records to be accessible in the event of an emergency affecting their premises or systems.</p> <p>Authorities should therefore have appropriate business continuity plans ensuring that the critical business activities referred to in their vital records will be able to continue in the event of a disaster. How each authority does this is for them to determine in light of their business needs, but the plan should point to it.</p> <p>Read further explanation and guidance about element 10 - https://www.nrscotland.gov.uk/files//record-keeping/public-records-act/ModelPlan.pdf</p>	<p>A business continuity and vital records plan serves as the main resource for the preparation for, response to, and recovery from, an emergency that might affect any number of crucial functions in an authority.</p> <p>The IJB's records will be subject to the policies and procedures of the partner body in relation to business continuity.</p> <p>The MoU sets out that the IJB's records are managed in accordance with East Lothian Council's Business Continuity and vital records arrangements.</p> <p>All services will continue to be provided or commissioned directly by NHS Lothian or East Lothian Council. As such, there is no direct requirement for the IJB to have its own arrangements for business continuity of vital records.</p> <p>Both NHS Lothian and East Lothian Council have adequate business continuity arrangements to ensure the sustainability of health and social care services for which the IJB has overall responsibility.</p> <p>As IJBs are now Category 1 Responders (under the Civil Contingencies Act 2004) East Lothian IJB has increased duties by joining other Category 1 responders, such as police, ambulance, fire and rescue services, local authorities, NHS Health Boards and in responding to emergencies and in maintaining key service delivery.</p>	<p>ELC Records Management Plan</p> <p>This plan will be managed In line with East Lothian Council Business Continuity</p>	<p>What further development, if any, remains to be undertaken to bring this element into full compliance.</p> <p>If there are any updates, NRS will be updated accordingly.</p>

RMP Element Description	East Lothian Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p>Element 11: Audit trail</p> <p>The Keeper will expect an authority's RMP to provide evidence that the authority maintains a complete and accurate representation of all changes that occur in relation to a particular record. For the purpose of this plan 'changes' can be taken to include movement of a record even if the information content is unaffected. Audit trail information must be kept for at least as long as the record to which it relates.</p> <p>This audit trail can be held separately from or as an integral part of the record. It may be generated automatically, or it may be created manually.</p> <p>Read further explanation and guidance about element 11 - https://www.nrscotland.gov.uk/files//record-keeping/public-records-act/ModelPlan.pdf</p>	<p>An audit trail is a sequence of steps documenting the movement and/or editing of a record resulting from activities by individuals, systems or other entities.</p> <p>The IJB's records are created by IJB and are managed via East Lothian Council.</p>	<p>The MoU sets out the IJB's Audit Trail arrangements</p> <p>East Lothian Records Management Plan Progress Update Review - PUR</p>	<p>What further development, if any, remains to be undertaken to bring this element into full compliance.</p> <p>If there are any updates, NRS will be updated accordingly.</p>

RMP Element Description	East Lothian Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p>Element 12: Competency framework for records management staff</p> <p>The Keeper will expect an authority's RMP to detail a competency framework for person(s) designated as responsible for the day-to-day operation of activities described in the elements in the authority's RMP. It is important that authorities understand that records management is best implemented by a person or persons possessing the relevant skills.</p> <p>A competency framework outlining what the authority considers are the vital skills and experiences needed to carry out the task is an important part of any records management system. If the authority appoints an existing nonrecords professional member of staff to undertake this task, the framework will provide the beginnings of a training programme for that person.</p> <p>The individual carrying out day-to-day records management for an authority might not work for that authority directly. It is possible that the records management function is undertaken by a separate legal entity set up to provide functions on behalf of the authority, for example an arm's length body or a contractor. Under these circumstances the authority must satisfy itself that the supplier supports and continues to provide a robust records management service to the authority.</p>	<p>As noted above the current Element 2 Officer is a temporary nomination, once vacancies are filled more detail will be provided.</p> <p>The IJB will refer to the East Lothian Element 2 Officer for information and support for compliance under this element.</p> <p>The Element 2 Officer has and will continue have access to the ELC training and guidance materials.</p>	<p>Council-wide training available, Screen Shots of guidance pages available on ELC intranet ELNet.</p> <p>Records Management will also be included ongoing development of wider training and awareness.</p> <p>A series of guidance documents issued to all staff by East Lothian Council regarding Records Management have been provided.</p> <p>The team responsible for delivering the IJB's functions is small, and the Element 2 Officer does not have formal qualifications in Records Management, nor is this an essential requirement of the post. We are committed, however, to promoting the Officer's continuing personal development in this area via the following measures:</p> <ul style="list-style-type: none"> • Ongoing consultation with the Council's Element 2 Officer for relevant advice and guidance. A professional postgraduate records management/archives administration qualification is an essential requirement of this post; • Participation in the Council's Information Governance and Security Forum; • Records Management training delivered by external providers; • Continuous review of ELC Records Management guidance and training for staff; • Engagement with professional networks such as the Public Records (Scotland) Act Discussion Group and the Scottish Council on Archives 	<p>What further development, if any, remains to be undertaken to bring this element into full compliance</p> <p>Work will be undertaken to develop a competency framework further listing the core competencies and the key knowledge and skills required by a Element 2 Officer.</p> <p>If there are any updates, NRS will be updated accordingly.</p>

RMP Element Description	East Lothian Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p>Element 13: Assessment and review</p> <p>Section 1(5) (i)(a) of the Act says that an authority must keep its RMP under review.</p> <p>An authority's RMP must describe the procedures in place to regularly review it in the future.</p> <p>It is important that an authority's RMP is regularly reviewed to ensure that it remains fit for purpose. It is therefore vital that a mechanism exists for this to happen automatically as part of an authority's internal records management processes.</p> <p>A statement to support the authority's commitment to keep its RMP under review must appear in the RMP detailing how it will accomplish this task.</p> <p>Read further explanation and guidance about element 13 - https://www.nrscotland.gov.uk/files//record-keeping/public-records-act/ModelPlan.pdf</p>	<p>The IJB will be adopting a similar process and schedule as East Lothian Council for assessment and review at a Senior Management level to ensure that the systems, policies and procedures that govern its records are being regularly assessed.</p> <p>This record management plan will be reviewed and updated through the Joint Management Team. During the first year any gaps in this plan will be identified as issues arise and solutions agreed.</p>	<p>East Lothian Council Records Management Plan</p> <p>Intention to participate in the PUR process with East Lothian Council, signed statement from SIRO</p> <p>East Lothian Paper – Annual Update Report on Records Management Plan - March 2022 presented to Elected Members</p>	<p>What further development, if any, remains to be undertaken to bring this element into full compliance.</p> <p>If there are any updates, NRS will be updated accordingly.</p>

RMP Element Description	East Lothian Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p>Element 14: Shared Information</p> <p>The Keeper will expect an authority's RMP to reflect its procedures for sharing information. Authorities who share, or are planning to share, information must provide evidence that they have considered the implications of information sharing on good records management.</p> <p>Information sharing protocols act as high-level statements of principles on sharing and associated issues and provide general guidance to staff on sharing information or disclosing it to another party. It may therefore be necessary for an authority's RMP to include reference to information sharing protocols that govern how the authority will exchange information with others and make provision for appropriate governance procedures.</p> <p>Specifically, the Keeper will expect assurances that an authority's information sharing procedures are clear about the purpose of record sharing which will normally be based on professional obligations. The Keeper will also expect to see a statement regarding the security of transfer of information, or records, between authorities whatever the format.</p>	<p>Under certain conditions, information given in confidence may be shared. Most commonly this relates to personal information, but it can also happen with confidential corporate records.</p> <p>The IJB may well be sharing data or information with its partner bodies that must be managed in accordance with the guidance issued by the Information Commissioner under the Data Protection Act 1998.</p> <p>The Act regards records created by a third party under contract to a public body to deliver a statutory function of that authority as public for the purposes of the Act. This means that authorities in such a relationship must be satisfied that public records being created on its behalf are managed in line with its RMP. It must be satisfied that the third-party provider has robust records management arrangements in place. However, it is unlikely that this is relevant to the IJB. The Keeper's Model Plan now includes an additional Element 15 regarding public records created or held by third parties (for example by external contractors). This would mostly be managed via contractual clauses and the tender process for new contracts.</p>	<p>An information sharing MoU has been agreed between NHS Lothian, East Lothian Council and IJB to enable the safe and effective sharing of information.</p> <p>Specific Data Sharing activities are covered by agreements between the IJB and relevant parties with reference to templates used by those parties i.e. East Lothian Council Templates.</p>	<p>What further development, if any, remains to be undertaken to bring this element into full compliance.</p> <p>If there are any updates, NRS will be updated accordingly.</p>

Evidence being submitted to NRS for ELHSCP IJB Record Management Plan August 2022

Element 1	Senior Management Responsibility	HSCP Director Job Outline - 050219/ Beginners Guide to info Asset Registers
Element 2	Records Manager Responsibility	ELIJB MoU/ELC Team Lead Informaiton Governance
Element 3	Records Management policy statement	ELC Informaiton and Records Management Policy/ELIJB MoU
Element 4	Business Classification	Copy of Screen Print of ELC File Stucture/ ELC Business Classification Scheme/Retention Schedule
Element 5	Retention Schedules	ELC Business Classification Scheme/Record Retention Scheme
Element 6	Destruction Arrangements	ELC Records Management Plan/ Informaiton and Records Management Policy
Element 7	Archiving and transfer arrangements	ELC Records Management Plan/ ELIJB MoU
Element 8	Information Security	ELC IT Acceptable Use Policy - Employees Only/ ELC Records Management Plan
Element 9	Data Protection	Data Protection Policy/What is a Prinvacy Notice/Data Protection Training/20210520 Social Work Training/Privacy Notice Template_GDPR/Data Protection Principles flyer/Data Protection Do's & Don't's/Consent/Data Protection Impact Assessment/GDPR Supplier Questionnaire Small Companies/Data Breach Procedure/data Breach Reporting Form/IAR Template/How to fill out the Informaiton Asset Register/Example workflows/Beginners Guide to info Asset Registers/Data sharing Agreement
Element 10	Business Continuity and vital records	ELC Records Management Plan
Element 11	Audit trail	ELC Records Management Plan/Progress Update Review PUR
Element 12	Competency framework for records management staff	?
Element 13	Assessment and review	ELC Records Management Plan
Element 14	Shared information	ELC/NHSL/ELHSCP Information Sharing Protocl

Overarching Memorandum of Understanding (MoU)

Between

East Lothian Integration Joint Board (IJB)

And

East Lothian Council

In relation to the IJB's Records Management Plan

Date: 22/08/2022

Ratification Date: 25/08/2022

Review Date: 25/08/2027

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1. PARTIES, SCOPE AND PURPOSE

1.1 Name and details of the parties

Legal name of parties	Short name of the party	Head Office address	ICO Registration
East Lothian Integration Joint Board	"IJB"	East Lothian HSCP, John Muir House, Brewery Park, Haddington, East Lothian, EH41 3HA	ZA259857
East Lothian Council	"Council"	John Muir House, Brewery Park, Haddington, East Lothian, EH41 3HA	Z5759571

1.2 Introduction

The Public Bodies (Joint Working) (Scotland) Act 2014 was passed by the Scottish Parliament in February 2014 and came into force on 1st April 2016 and provides the framework for the integration of health and social care services in Scotland. Roles and responsibilities of Integration Joint Boards (IJBs) including the need for a Records Management Plan (RMP) are set out here:

<https://www.gov.scot/Publications/2015/09/8274/2>

East Lothian IJB governs the Health and Social Care Partnership (HSCP) which plans and delivers a range of services to the residents of East Lothian. The arrangements for the HSCP and the IJB are set out in the IJB's Integration Scheme of 29th May 2015, (revised in June 2022) approved by Scottish Ministers, East Lothian Council and NHS Lothian. The IJB operates as a body corporate (a separate legal entity) acting independently of Lothian Health Board and East Lothian Council.

Each of the Parties listed above is obliged to submit and maintain a Records Management Plan (RMP) as defined in and in accordance with the Public Records (Scotland) Act 2011.

The Act requires named public authorities to submit a Records Management Plan to be agreed by the Keeper of the Records of Scotland. Lothian Health Board and East Lothian Council already have agreed Record Management Plans in place. IJBs were added to the Act's schedule by the Public Bodies (Joint Working) (Scotland) Act 2014 and this Memorandum of Understanding sets out how each of these RMPs relate to each other.

1.3 Context

The majority of records including employment, service user and internal policies and procedures will continue to be managed in the parent body organisations, i.e. East Lothian Council (the Council/ELC) and Lothian Health Board (the Board) and as such will be covered by their respective record management plans.

The records covered by the IJB's records management plan constitute IJB business in terms of:

- IJB Meetings and related committees - agendas and papers, including Directions, Audit and Risk Committee and Strategic Planning
- IJB Strategies and Policies, including the Annual Report, Strategic Plan and Delivery Plan.

1.4 Purpose

This Memorandum of Understanding sets out the agreement between the IJB and the Council and the Board on how the process of depositing, storing and accessing the IJB's records of enduring value (those of continued significance, that warrant preservation) will operate.

1.5 Records Management

The Parties acknowledge and agree that the responsibility for creating and maintaining the IJB's records will be delegated to officers of the East Lothian Health and Social Care Partnership, with the records stored on the Council's server and, where appropriate, publicly accessible through the Council's website.

The IJB will follow the corporate Business Classification Scheme (BCS) adopted by the Council and the Council's BCS has been updated to include IJB records. This has been discussed and agreed as a sensible approach by the Board and the Council. IJB records are stored on ELC servers and made publicly available via the ELC website with the agreement of the IJB.

As such, the IJB's Records Management Plan evidences compliance via referencing both the Council's and the Board's Records Management Plans.

1.6 Parties' Responsibilities

All of the IJB's records will be subject to policies and procedures compliant with Council and Board requirements. The nominated officers within the HSCP will have operational responsibility for records maintenance and will be empowered to access these policies

and procedures, as well as undergoing appropriate training, e.g., Data Protection, Information Security, etc.

IJB records are part of the East Lothian Council Committee Management System. Documents relating to IJB meetings, including those relating to the Audit and Risk Committee, are available on the Council's website. East Lothian Council retain copies of all documents which can be easily retrieved if required. Currently, the IJB records on the website date back to 2015 and as such have permanent retention status, which comply with statutory obligations set out under the Public Records (Scotland) Act 2011 and all other relevant legislation. The IJB's records are managed in accordance with the Council's Business Continuity and Vital Records arrangements. The Council's audit trail arrangements will ensure that records are retrievable and offers certainty around version control. The IJB will rely on the Council to ensure that the systems, policies and procedures that govern its records are being regularly assessed. An annual review will be undertaken by a group nominated by the IJB to ensure this is being done effectively.

East Lothian Council agrees to make its staff training and guidance materials regarding records management, data protection and information governance available to IJB members and Health and Social Care Partnership staff as needed and relevant to roles.

The Council agrees to consult with the IJB regarding any changes or improvements to the Council's provision for the long-term preservation of records in digital format.

2. CORPORATE RESPONSIBILITY

The IJB's Chief Officer has senior responsibility for all aspects of the IJB's Records Management and is also the IJB's Senior Information Risk Owner (SIRO). The Chief Officer is content that all IJB Records will be managed by nominated HSCP Officers and stored by East Lothian Council in line with Council policies and in compliance with Board policies. All relevant records management arrangements agreed under the Council's RMP apply to the IJB records in its keeping. This is facilitated by this Memorandum of Understanding. In addition, the IJB's Chief Officer is satisfied that the Council and the Board has appropriate records management arrangements in place and that each has already been approved by the Keeper.

3. SIGN-OFF AND RESPONSIBILITIES

3.1 Name of Accountable Officer, etc.

The Accountable Officers for the Parties are:

Accountable Officer Name	Post title	Organisation
Alison Macdonald	Chief Officer	East Lothian Integration Joint Board
Morag Ferguson	Head of Council Support	East Lothian Council

3.2 Leads for Records Management

The lead for Records Management at each of the Parties is:

Name	Post title	Organisation
Paul Currie	Interim General Manager Strategic Integration	East Lothian Health and Social Care Partnership
Catriona Cockburn	Business Operations Manager	
Zarya Rathé	Team Manager- Information Governance and Data Protection Officer	East Lothian Council

3.3 Signatories


The following individuals (being authorised signatories) will sign this Memorandum of Understanding on behalf of the Parties:


Name of Party	East Lothian Integration Joint Board	
Authorised signatories	Title /Name	Fiona Wilson
	Role	Chief Officer
Head Office address	East Lothian HSCP, John Muir House, Brewery Park, Haddington, East Lothian, EH41 3HA	

Name of Party	East Lothian Council	
Authorised signatories	Title /Name	Morag Ferguson
	Role	Head of Council Support
Head Office address	John Muir House, Brewery Park, Haddington, East Lothian, EH41 3HA	

3.4 Sign off

"We the undersigned agree to the details recorded in this Overarching Memorandum of Understanding; are satisfied that our representatives have carried out the necessary work to ensure that the IJB complies with the Public Records (Scotland) Act 2011. The IJB will submit and maintain a Records Management Plan to the Keeper. We agree to review this document on an annual basis.

Signature 	
For and on behalf of East Lothian Integration Joint Board	
Name	Fiona Wilson
Date	18 August 2022

Signature 	
For and on behalf of East Lothian Council	
Name	Morag Ferguson
Date	31 May 2022

Review Date: 25/08/2027