

**The Public Records (Scotland) Act 2011**

**Fife Integration Joint Board**

**Progress Update Review (PUR) Report by the PRSA Assessment Team**

**6<sup>th</sup> June 2025**

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## 1. The 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 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 recordkeeping 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. Progress Update Review (PUR) Mechanism

Under section 5(1) & (2) of the Act the Keeper may only require a review of an authority's agreed RMP to be undertaken not earlier than five years after the date on which the authority's RMP was last agreed. Regardless of whether an authority has successfully achieved its goals identified in its RMP or continues to work towards them, the minimum period of five years before the Keeper can require a review of a RMP does not allow for continuous progress to be captured and recognised.

The success of the Act to date is attributable to a large degree to meaningful communication between the Keeper, the Assessment Team, and named public authorities. Consultation with Key Contacts has highlighted the desirability of a mechanism to facilitate regular, constructive dialogue between stakeholders and the Assessment Team. Many authorities have themselves recognised that such regular communication is necessary to keep their agreed plans up to date following inevitable organisational change. Following meetings between authorities and the Assessment Team, a reporting mechanism through which progress and local initiatives can be acknowledged and reviewed by the Assessment Team was proposed. Key Contacts have expressed the hope that through submission of regular updates, the momentum generated by the Act can continue to be sustained at all levels within authorities.

The PUR self-assessment review mechanism was developed in collaboration with stakeholders and was formally announced in the Keeper's Annual Report published on 12 August 2016. The completion of the PUR process enables authorities to be credited for the progress they are effecting and to receive constructive advice concerning on-going developments. Engaging with this mechanism will not only maintain the spirit of the Act by encouraging senior management to recognise the need for good records management practices, but will also help authorities comply with their statutory obligation under section 5(1)(a) of the Act to keep their RMP under review.

**3. Executive Summary**

This Report sets out the findings of the Public Records (Scotland) Act 2011 (the Act) Assessment Team’s consideration of the Progress Update Review template submitted for **Name of authority**. The outcome of the assessment and relevant feedback can be found under sections 6 – 8.

**4. Authority Background**

Fife Integration Joint Board (the Board) is responsible for the planning, oversight and delivery of health and social care integrated functions for Fife.

The Board’s Integration Scheme sets out the functions which are delegated by Fife Health Board (NHS Fife) and Fife Council to the IJB.

The Board operates as a body corporate (a separate legal entity), acting independently of NHS Fife and Fife Council. The Board consists of sixteen voting members appointed in equal number by NHS Fife and Fife Council, with a number of representative members who are drawn from the third sector, independent sector, staff, carers and service users. The Board is advised by a number of professionals including the Chief Officer, Chief Finance Officer, Associate Nurse Director, Medical Practitioner Representatives, and Chief Social Work Officer.

The key functions of the Board are:

- Overseeing the development and preparation of the Strategic Plan for services delegated to the Board.
- Allocating resources in accordance with the Strategic Plan
- Ensuring that the national and local Health and Wellbeing Outcomes are met.

5. Assessment Process

A PUR submission is evaluated by the Act’s Assessment Team. The self-assessment process invites authorities to complete a template and send it to the Assessment Team one year after the date of agreement of its RMP and every year thereafter. The self-assessment template highlights where an authority’s plan achieved agreement on an improvement basis and invites updates under those ‘Amber’ elements. However, it also provides an opportunity for authorities not simply to report on progress against improvements, but to comment on any new initiatives, highlight innovations, or record changes to existing arrangements under those elements that had attracted an initial ‘Green’ score in their original RMP submission.

The assessment report considers statements made by an authority under the elements of its agreed Plan that included improvement models. It reflects any changes and/or progress made towards achieving full compliance in those areas where agreement under improvement was made in the Keeper’s Assessment Report of their RMP. The PUR assessment report also considers statements of further progress made in elements already compliant under the Act.

Engagement with the PUR mechanism for assessment cannot alter the Keeper’s Assessment Report of an authority’s agreed RMP or any RAG assessment within it. Instead the PUR Final Report records the Assessment Team’s evaluation of the submission and its opinion on the progress being made by the authority since agreeing its RMP. The team’s assessment provides an informal indication of what marking an authority could expect should it submit a revised RMP to the Keeper under the Act, although such assessment is made without prejudice to the Keeper’s right to adopt a different marking at that stage.

Key:

G	The Assessment Team agrees this element of an authority’s plan.	A	The Assessment Team agrees this element of an authority’s progress update submission as an ‘improvement model’. This means that they are convinced of the authority’s commitment to closing a gap in provision. They will request that they are 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 Assessment Team may choose to notify the Keeper on this basis.
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6. Progress Update Review (PUR)

Fife Integration Joint Board

Element	Status of elements under agreed Plan 19SEP19	Progress review status 18JUN24	Progress review status 06JUN25	Keeper's Report Comments on Authority's Plan 19SEP19  For Assessment Report at <a href="https://www.nrscotland.gov.uk/files//record-keeping/public-records-act/keepers-assessment-report-fife-integration-joint-board.pdf">https://www.nrscotland.gov.uk/files//record-keeping/public-records-act/keepers-assessment-report-fife-integration-joint-board.pdf</a>	Progress Review Comment 18JUN24	Self-assessment Update as submitted by the Authority since 18JUN24	Progress Review Comment 06JUN25
1. Senior Officer	G	G	G	Update required on any change.	Thank you for confirming that the person named under Element 1 has not changed for Fife Integration Joint Board. Update required on any future change.	Change to this element. <b>Lynne Garvey</b> is now Chief Officer of Fife Integration Joint Board and is the Senior Officer with senior management responsibility for all aspects of records management within the Board.	Thank you for this update. We have now revised your details on our contacts spreadsheet to show Ms Garvey as Chief Officer. The Keeper has previously indicated that a change of an individual identified against a particular element of an RMP does not invalidate that RMP, provided that the role remains substantially similar.
2. Records Manager	G	G	G	Update required on any change.	Thank you for confirming that Mrs Sweeney remains responsible for day-to-day operational responsibility for the implementation of the Records Management Plan at Fife IJB. Update required on any future change.	No change: Avril Sweeney, Manager, Risk Compliance for Fife Health and Social Care Partnership continues to have day-to-day operational responsibility for records management within the IJB. Mrs Sweeney continues to report to Audrey Valente, Chief Finance Officer, Fife Integration Joint Board and is supported by two compliance officers.	Thank you for confirming that Mrs Sweeney remains responsible for day-to-day operational responsibility for the implementation of the Records Management Plan at Fife IJB. Update required on any future change.
3. Policy	G	G	G	Update required on any change.	Thank you for confirming that Fife IJB continues to have a current Records Management Policy. It is also good to hear that this is available on the website.	No change the Records Management Policy is available on the HSCP website: <a href="#">Microsoft Word - Fife IJB Records Management Policy V4.0</a> The Policy will be reviewed 2025.	Thank you for this update. In the Keeper's original agreement it was noted that Fife Integration Joint Board had indicated a process for ensuring that relevant information governance policies are kept under review. It is welcome to see confirmation that this is being appropriately pursued.  There is no requirement under the Act for new policies and guidance documents to be submitted to the Keeper (other than at the time of a full review/resubmission). However, if the IJB wished to voluntarily provide these, (perhaps at the time of the next PUR)



							this would allow the Keeper to keep their PRSA case file up-to-date.
4. Business Classification	A	G	G	<p>The Further Development section of this Element states that the structure of the BCS will be imposed onto an area of Fife Council's SharePoint system. All Board records will over time be migrated to this system, which will include a document storage site and a bespoke tool for creating and managing records of committee meetings. A screenshot of the SharePoint test site has been submitted (evidence 4.2) showing how the proposed new system will look. This work is dependent upon the allocation of Fife Council resources and has a provisional timescale for completion of December 2019. The Keeper understands that timescales can slip due to other priorities but requests that he is kept informed of the progress of this piece of work.</p> <p>The Keeper can agree this Element on an 'Improvement Model' basis. This means that the Board has identified an improvement to its recordkeeping arrangements (the consolidation of Board records into a single area of Fife Council's SharePoint system) and has outlined the proposed timescales for completion. This agreement is dependent upon the Keeper being kept informed on the progress of this work.</p>	<p>Thank you for confirming that records migration from the NHS systems has now been completed. This is excellent news.</p> <p>That the Business Classification Scheme is currently under review is also good news.</p> <p>Fife IJB has now closed the gap identified in 2019 (Board records have now been consolidated into a single area of Fife Council's SharePoint system). Accordingly, Element 4's PUR status can be turned Green to celebrate this progress. While this does not change the original Agreed RMP status, it is indicative of the likely status awarded in the event of a formal resubmission and the provision of evidence.</p>	No change. The Business Classification Scheme review is complete and was approved in April 2024.	As noted previously the full imposition of the IJB business Classification Scheme on the Council's SharePoint structure marks a measurable improvement in the records management provision in the authority and, therefore, if this were a <u>formal full re-submission</u> (and a screenshot could be supplied showing the public records of the IJB on the Council site) it is likely that this element of the Plan would turn from Amber to Green.
5. Retention Schedule	A	G	G	<p>The Board will migrate all of its records, currently managed by both Fife Council and NHS Fife, on to Fife Council's SharePoint system. This should allow these records to be managed easier in the single location and should allow the easier appliance of retention actions at the appropriate time.</p> <p>The Keeper can agree this Element on an 'Improvement Model' basis. This means that the authority has identified a long term solution for effectively managing the retention of its records (migration to Fife Council's SharePoint system) and will be working towards implementation in the near future.</p>	<p>It is great to hear that the migration from both NHS Fife and Fife Council systems has now been completed, and that automated records retention functionality is available on SharePoint.</p> <p>This PUR Element has been turned Green. The original RMP status of this Element remains unchanged, but a Green PUR status indicates that Fife IJB is well-placed to receive a Green status upon any formal RMP resubmission.</p>	No change. The Retention Schedule review is complete and was approved in April 2024.	Retention schedules are living documents liable to change to reflect business needs. Again it appears that Fife Integration Joint Board understand this.

				The Keeper requests that he is kept informed of the progress of this work.			
6. Destruction Arrangements	G	G	G	Update required on any change.	Update required on any future change.	No Change	No immediate action required. Update required on any future change.
7. Archiving and Transfer	A	G	G	<p>As the Board is a separate legal body from the Council, the Keeper would encourage the Board to set up a formal archiving agreement with the Council's Archive Service as soon as is practical, even if there is no immediate intention to deposit.</p> <p>As the Board's selected archive, Fife Council's Archive Service, is currently unable to accept the transfer of digital records the Keeper can agree this Element on an 'Improvement Model' basis. The Keeper is assured by the commitment of Fife Council to develop a solution to digital archiving. In the meantime, as part of this agreement, the Keeper recommends that the Board enters into a formal agreement to transfer its records to the Council's archive service so that the framework is in place to transfer records when digital archiving becomes available.</p>	<p>Thank you for letting us know that a formal Deposit Agreement with Fife Cultural Trust is now in place.</p> <p>The IJB has also confirmed via email that long-term digital archiving arrangements are being explored in line with Fife Council's plans.</p> <p>This Element has been turned from Amber to Green in the PURs to celebrate this progress. This does not change the original RMP assessment status, but indicates that Fife IJB is well-placed under this Element should a formal RMP resubmission occur.</p>	No Change	No immediate action required. Update required on any future change.
8. Information Security	G	G	G	Update required on any change.	Update required on any future change.	No Change	No immediate action required. Update required on any future change.
9. Data Protection	G	G	G	Update required on any change.	<p>Thank you for indicating that both the IJB Data Protection Policy and Privacy Notice continue to be made available on the website, and that a review of both of these documents has recently been completed.</p>	<p>No change the Data Protection Policy is available on the HSCP website:</p> <p><a href="#">Microsoft Word - Fife IJB Data Protection Policy V4.0</a></p> <p>This was reviewed in 2024.</p> <p>No Change. The IJB Privacy Notice is available on the HSCP website and was reviewed in 2024.</p> <p><a href="#">Privacy notice   Fife Health and Social Care</a></p>	<p>Thank you for this update. The comments have been noted.</p> <p>Furthermore the Assessment Team note that Fife Integration Joint Board is registered with the Information Commissioner as a data controller: <a href="#">Information Commissioner's Office - Register of data protection fee payers - Entry details</a></p> <p>As noted, they publish a Privacy policy online: <a href="https://www.fifehealthandsocialcare.org/media/czkfcmw/fife-ijb-data-protection-policy-v4.pdf">https://www.fifehealthandsocialcare.org/media/czkfcmw/fife-ijb-data-protection-policy-v4.pdf</a></p>

							<p>This includes details of service user's rights as a data subject.</p> <p>This element retains its Green RAG status.</p>
10. Business Continuity and Vital Records	G	G	G	Update required on any change.	Update required on any future change.	No Change	No immediate action required. Update required on any future change.
11. Audit Trail	A	G	G	<p>The RMP acknowledges that Board records are currently managed using NHS Fife and Fife Council systems (shared drives) which provide limited audit trail functionality. This is confirmed by the fact that the RMPs of Fife Council and NHS Fife have been agreed by the Keeper under 'improvement model' terms for element 11. This means that both authorities have identified gaps in provision in this element and are working to close that gap.</p> <p>The Keeper can agree this Element on an 'Improvement Model' basis. This is due to the authority having identified a gap in provision (the lack of audit trail functionality of records currently held on shared drives provided by partner bodies, their arrangements under this Element having also been agreed on an 'Improvement Model' basis by the Keeper) but has evidenced how it intends to close this gap. This agreement is dependent upon the Keeper being regularly informed on the progress of work to close the gap.</p>	<p>It is great to hear that the migration from both NHS Fife and Fife Council systems has now been completed, and that audit trail functionality is available on SharePoint. Accordingly, this PUR Element has been turned Green. The original RMP status of this Element remains unchanged, but a Green PUR status indicates that Fife IJB is well-placed to receive a Green status upon any formal RMP resubmission.</p> <p>Update required on any future change.</p>	No Change	No immediate action required. Update required on any future change.
12. Competency Framework	G	G	G	The Further Development section of this element states that both partner bodies are currently developing the information governance competency framework for their staff. A statement from the Council's records manager (evidence 12.1) confirms the current development of a training framework, tied in with data protection and information security, and will be tailored to the requirements of staff. <b>The Keeper would be interested to know if this results in any significant changes to current provision.</b>	Thank you for this positive update on records management training. It is good to hear staff continue to be supported in maintaining and growing their records management skills and knowledge.	No Change	No immediate action required. Update required on any future change.
13. Assessment and Review	G	G	G	Update required on any change.	The Assessment team thanks you for this progress update on the Fife IJB RM Action Plan.	One action remains outstanding, due to actions being required by another partner body.	Section 1(5)(i)(a) of the Act says that an authority must keep its RMP under review. The Keeper's Assessment

					<p>Element 13 stipulates that the authority's Records Management Plan should be regularly reviewed.</p> <p>Fife IJB is not currently scheduled to resubmit its RMP for the Keeper's Assessment. Should Fife IJB intend to voluntarily resubmit its Plan for the Keeper's assessment before it is formally invited to do so under the Act, this would be very welcome, and entirely in the spirit of the Act. When relevant, the Team asks to be notified of the timescales in advance of this submission if possible.</p>		<p>Team acknowledge that this requirement is being appropriately pursued by Fife Integration Joint Board.</p> <p>They welcome the authority's continued engagement with the Keeper's Progress Update Review (PUR) process.</p> <p>At the time of the original agreement (2019) The Keeper agreed that the IJB had made a firm commitment to review their <i>RMP</i> as required by the Act and have explained who will carry out this review and by what methodology.</p>
14. Shared Information	G	G	G	Update required on any change.	Thank you for this update on Information Sharing Agreements which has been noted.	Information Sharing Agreement has been reviewed and completed in March 2024.	Thank you for confirming that that information sharing with other bodies or individuals is appropriately controlled and that records management is properly considered. The evidence package that accompanied the last RMP submission included an example of data sharing agreement and the Keeper was able to agree that Fife Integration Joint Board properly considers records governance when undertaking information sharing programmes. Therefore, this element retains its Green 'compliant' RAG status.

7. The Public Records (Scotland) Act Assessment Team’s Summary

Version

The progress update submission which has been assessed is the one received by the Assessment Team on 21st January 2025. The progress update was submitted by Avril Sweeney, Manager, Risk Compliance.

The progress update submission makes it clear that it is a submission for **Fife Integration Joint Board**.

The Assessment Team has reviewed Fife Integration Joint Board’s Progress Update submission and agrees that the proper record management arrangements outlined by the various elements in the authority’s plan continue to be properly considered. The Assessment Team commends this authority’s efforts to keep its Records Management Plan under review.

General Comments

Fife Integration Joint Board continues to take its records management obligations seriously and is working to maintain all elements in full compliance.

Section 5(2) of the Public Records (Scotland) Act 2011 provides the Keeper of the Records of Scotland (the Keeper) with authority to revisit an agreed plan only after five years has elapsed since the date of agreement. Section 5(6) allows authorities to revise their agreed plan at any time and resubmit this for the Keeper’s agreement. The Act does not require authorities to provide regular updates against progress. The Keeper, however, encourages such updates.

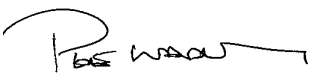
The Keeper cannot change the status of elements formally agreed under a voluntary submission, but he can use such submissions to indicate how he might now regard this status should the authority choose to resubmit its plan under section (5)(6) of the Act.

8. The Public Records (Scotland) Act Assessment Team’s Evaluation

Based on the progress update assessment the Assessment Team considers that Fife Integration Joint Board continue to take their statutory obligations seriously and are working hard to maintain all the elements of their records management arrangements in full compliance with the Act and fulfil the Keeper’s expectations.

The Assessment Team recommends authorities consider publishing PUR assessment reports on their websites as an example of continued good practice both within individual authorities and across the sector.

This report follows the Public Records (Scotland) Act Assessment Team’s review carried out by



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Pete Wadley  
Public Records Officer