

REPORT TO: East Lothian Integration Joint Board

MEETING DATE: 26 February 2026

BY: Chief Officer

SUBJECT: IJB Records Management Plan Bi-Annual Progress Update Review

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1 PURPOSE

- 1.1 To meet statutory requirements, East Lothian Integration Joint Board is required to develop an agreed 'Records Management Plan' (RMP) for certain documents it produces. National Records of Scotland require this plan to be reviewed bi-annually.

2 RECOMMENDATIONS

The Integration Joint Board is asked to:

- 2.1 Note the attached National Records of Scotland Plan Update Review report.
- 2.2 Note the positive conclusion of the Record Management Plan review.
- 2.3 Note actions required by East Lothian Council as the governing body of the Integration Joint Board's Record Management Plan.
- 2.4 Note the next review in 2027.

3 BACKGROUND

- 3.1 Integration Joint Board's Record Management Plan was published on East Lothian Council website in 2023. National Records of Scotland suggest publishing the attached report as an indication of the good work and progress underway in relation to record management arrangements.
- 3.2 East Lothian Council Information Governance continue to manage and store East Lothian Integration Joint Board's records to a high standard in line with the Records Management Plan and an associated Memorandum of Understanding.

- 3.3 There are several elements of the Record Management Plan that are at Amber or Amber/Green status. For example, Element 2 – Records Manager is specific to Integration Joint Board’s Record Management Plan. It has been assessed that the Keeper is convinced of the authority’s commitment to closing a gap in provision, and, through this review process, the Integration Joint Board’s commitment to update National Records Scotland as work on this element progresses. It has been noted that transformation of staff structures are ongoing and review of job descriptions are planned. Other elements at Amber status or Amber/Green status, in the main, rely on East Lothian Council’s arrangements which host the Integration Joint Board’s Records Management activity.

4 ENGAGEMENT

- 4.1 Engagement has been with East Lothian Council’s Data Protection Officer and the Keeper of National Records Scotland.

5 POLICY IMPLICATIONS

- 5.1 There are no policy implications.

6 INTEGRATED IMPACT ASSESSMENT

- 6.1 The subject of this report does not affect the wellbeing of the community or have a significant impact on equality, the environment or economy.

7 DIRECTIONS

- 7.1 None

8 RESOURCE IMPLICATIONS

- 8.1 Financial – None
8.2 Personnel – None
8.3 Other – None

9 BACKGROUND PAPERS

- 9.1 None

Appendices:

Appendix 1: Progress Update Review (PUR) Final Report: East Lothian
Integration Joint Board

Appendix 2: Letter to Chief Officer

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DATE	10 February 2026

The Public Records (Scotland) Act 2011

East Lothian Integration Joint Board

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

5th September 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 East Lothian Integration Joint Board. The outcome of the assessment and relevant feedback can be found under sections 6 – 8.

4. Authority Background

The East Lothian Integration Joint Board is made up of representatives from NHS Lothian, East Lothian Council, the Third and Independent Sectors and those who use health and social care services. It was set up as part of the Public Bodies (Joint Working) (Scotland) Act 2014, which aims to integrate health and social care at a local level. East Lothian IJB is responsible for the planning, resourcing and operational oversight of health and social care services in East Lothian. The IJB operates as a body corporate (a separate legal entity) acting independently of Lothian Health Board and East Lothian Council.

[Our vision and aims | Integrating health and social care in East Lothian | East Lothian Council](#)

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) Template: East Lothian Integration Joint Board

Element	Status of elements under agreed Plan 30MAR23	Status of evidence under agreed Plan 30MAR23	Progress review status 05SEP25	Keeper's Report Comments on Authority's Plan 30MAR23	Self-assessment Update as submitted by the Authority <u>since</u> 30MAR23	Progress Review Comment 05SEP25
1. Senior Officer	G	G	G	Update required on any change.	No Change.	Update required on any change.
2. Records Manager	A	G	A	<p>The <i>RMP</i> notes that the individual identified at element 2 is appointed on a temporary basis and is not a professional records manager. On this latter point the Keeper accepts that in the case of a small organisation, particularly one whose records are managed by another larger authority, it is not necessary to appoint a full-time trained records manager to this element. The Keeper requires that he is informed when the temporary appointment is permanently settled. He notes that the 'future developments' section against this element commits the IJB to do this. The IJB have confirmed this: "the Operational Business Manager post within Planning & Performance Service job description is being updated and is to be progressed through NHSL Job evaluation process. A copy of the approved post job description with confirmation of the post holder's name will be provided to the Keeper as soon as possible."</p> <p>The Keeper also notes a 'future development', elsewhere in the <i>RMP</i>, that "Work will be undertaken to develop a competency framework further" (<i>RMP</i> page 20). The Keeper accepts that</p>	No change yet, transformational of staff structures are ongoing. Senior Management within East Lothian Health & Social Care Partnership are aware of this requirement.	<p>Thank you for confirming that work under this Element is ongoing and on the authority's radar.</p> <p>This Element remains at Amber while work is ongoing.</p>

				<p>this framework will be developed as the post becomes permanent. [...]</p> <p>The Keeper can agree this element of the East Lothian Integration Joint Board <i>RMP</i> on 'Improvement Model' basis while a permanent appointment is made. Once the Keeper has been informed of the name of the individual whose permanent role is to include pursuing implementation of the plan (alongside evidence of this being a formal part of their annual objectives) he should be able to fully agree this element.</p>		
3. Policy	G	G	G	Update required on any change.	No Change.	Update required on any change.
4. Business Classification	A	G	A	<p>The Keeper has accepted, for the purposes of this assessment, that all the record of the IJB are managed digitally. The compliance statement on page 14 clearly states "All IJB Records will be held electronically on East Lothian Council's system". However, he notes a statement on <i>RMP</i> page 8 that refers to the storage of records held in paper format. There is no further elaboration around this elsewhere in the plan. The IJB have now confirmed to the Keeper that it does not currently make use of the Council's paper records storage facilities mentioned on page 8, nor its professional Archives store in the John Gray Centre. They confirm that the IJB does not generate paper records with retention requirements beyond immediate use (working copy/print-outs etc).</p> <p>In 2015 the Keeper agreed this element of the East Lothian Council <i>Records Management Plan</i>. However, he did so under 'amber' improvement model terms as, at time of the agreement, the</p>	No Change.	This Element remains at Amber as it relies on East Lothian Council's arrangements which host the IJB's. Update required on any change.

				<p>Council had not fully rolled-out their <i>Business Classification Scheme/Information Asset Register</i>. The Keeper understands that the Council intend to formally resubmit their <i>RMP</i> for his consideration, but until this has been agreed this element remains at Amber. The Keeper has determined that the element rating of a public authority, whose records are managed on another authority's systems, cannot normally be higher than that awarded to the 'host'.</p> <p>Therefore, the Keeper agrees this element of the <i>RMP</i> on similar 'improvement model terms'.</p>		
5. Retention Schedule	A	G	A	<p>In January 2015 the Keeper agreed this element of East Lothian Council's <i>Records Management Plan</i>. However, he did so under 'amber' improvement model terms as, at time of the agreement, the Council had not fully rolled-out their retention schedule. The Keeper understands that the Council intend to formally resubmit their <i>RMP</i> for his consideration, but until this has been agreed this element remains at Amber. The Keeper has determined that the element rating of a public authority, whose records are managed on another authority's systems, cannot normally be higher than that awarded to the 'host'.</p> <p>Therefore, the Keeper agrees this element of the <i>IJB RMP</i> under the same 'improvement model' terms as the 'host' authority.</p>	<p>East Lothian Council are reviewing their records retention schedule on a monthly basis. The Council are actively participating in the National Archivists sub-group tasked with reviewing Scottish Council on Archives Record Retention Schedules (SCARRS).</p>	<p>Thank you for this update on focus on rolling records retention schedule review. The Council's involvement with SCARRS review is also positive and noted with thanks.</p> <p>This Element remains at Amber as it relies on East Lothian Council's arrangements which host the <i>IJB</i>'s.</p>
6. Destruction Arrangements	A	G	A	<p>As with other elements the Keeper agreed this element of East Lothian Council's <i>RMP</i> under improvement model terms and, as this is the case, the Keeper can agree this element of the East Lothian Integration Joint Board's <i>RMP</i> on similar 'improvement model terms'.</p>	<p>No change.</p>	<p>This Element remains at Amber as it relies on East Lothian Council's arrangements which</p>

						<p>host the IJB's. Update required on any change.</p>
<p>7. Archiving and Transfer</p>	<p>A</p>	<p>G</p>	<p>G</p>	<p>The <i>RMP</i> also notes that “Work is ongoing at East Lothian Council to develop more robust policies and procedures regarding Digital preservation”. (<i>RMP</i> page 15). The Keeper agrees. It is appropriate that the IJB recognise the need for their ‘host’ archive to pursue digital preservation provision for its records and the Keeper requires the IJB to liaise with the council over this. It seems there are plans in place to do this: The Keeper recognises that the <i>MoU</i> states “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. (<i>MoU</i> section 1.6)</p> <p>Since the submission of the <i>RMP</i> for the Keeper’s assessment the IJB have provided an update on the current situation as follows: “Arrangements are currently in place between East Lothian Council’s Democratic Services team and the Council Archives to transfer all permanent Committees records to a separate drive in the custody of the Council’s professional Archivists. These records are held in electronic format and include permanent IJB records. Committee Services retain access copies of these permanent records on the Council’s file network for business purposes, as well as ‘administrative’ or ‘category 2’ records relating to the IJB. These administrative records are regularly reviewed for destruction in line with the Retention Schedule under Element 4 [5?] and destroyed in line with the Council’s provisions under Element 6. As noted in the body of the IJB’s <i>RMP</i>, the Council is</p>	<p>Currently Digital Preservation has been on hold, awaiting return of the relevant Council Officer. This is expected end of July 2025.</p>	<p>Thank you for this update on digital preservation.</p> <p>This Element relies on action by East Lothian Council. While a digital preservation solution is not yet fully rolled out, progress at East Lothian Council has been positive.</p> <p>This Element has been changed from Amber to Green to reflect East Lothian Council's improvements reported in their PUR. This does not indicate work is fully completed, but reflects that progress continues to be made under this Element.</p>

				<p>currently progressing improvements to its provisions for the long-term preservation of its digital records of enduring value, and will continue to engage actively with the IJB as its work in this area progresses” The Keeper appreciates this update and agrees that the IJB are properly engaged with the archiving of their public records (Statement from the IJB provided during the assessment process).</p> <p>The Keeper agrees this element of the IJB plan under improvement model terms, while a digital preservation solution is identified, and rolled-out, by East Lothian Council.</p>		
8. Information Security	G	G	G	Update required on any change.	Additional Meta Compliance eLearning has been introduced. All staff with access to East Lothian Council IT systems are required to complete.	Thank you for this update on Information Security training.
9. Data Protection	G	G	G	Update required on any change.	East Lothian Council Data Protection Policy was reviewed on 1 st May 2024. Actions taken were, improved training and awareness. East Lothian Council are continuing to progress an improved Asset Information Register in line with Article 30 Requirement. However East Lothian Council are exploring using Microsoft SharePoint to replace the	Thank you for this update on Data Protection Policy update and improvements in awareness and training provision. Ongoing work on SharePoint implementation is also noted with thanks.

					functionality of the Information Asset Register.	
10. Business Continuity and Vital Records	A	G	G	In 2015 the Keeper agreed the business continuity arrangements of East Lothian Council. However, this agreement was under 'improvement model' terms on the grounds that their <i>Business Continuity Plan</i> had not been rolled out. The Keeper's PRSA Assessment Team is pleased to report that this has now been done. However, as the council have not yet officially resubmitted their reviewed <i>RMP</i> for the Keeper's formal agreement he is unable to formally change the RAG status against this element and, as this is the case, this element of the IJB is, for the present, awarded a matching amber RAG status.	No Change.	This Element would normally remain at Amber as it relies on East Lothian Council's arrangements which host the IJB's. However, East Lothian Council has recently obtained a Green status under Element 10 in its PURs to reflect the progress made. Accordingly, East Lothian IJB will also receive a Green status under this Element. This does not change the original agreement's status.
11. Audit Trail	A	G	A	In 2015 the Keeper agreed the 'audit trail' provision of East Lothian Council. However, he did so under 'improvement model' terms stating: "The Keeper can agree this element on 'Improvement Model' terms. This means that he is convinced that tighter oversight of record location and of version control will result ... he requests that he is kept up-to-date with the project as it progresses." The Keeper acknowledges that East Lothian Council have	There has not been a significant change that would impact East Lothian Integration Joint Board. However, East Lothian Council are progressing the roll of Microsoft SharePoint. This is currently being piloted in	Thank you for confirming that there have been no significant changes under this Element. The ongoing roll-out of SharePoint and its capability to automatically record

				<p>been proactive in keeping him up-to-date with progress in their digital records management transformation process. However, as at 2022 this element of the council <i>RMP</i> remains an improvement model.</p> <p>As with other elements above, the Keeper has determined that the RAG status awarded any element of an authority's records management plan must not be higher than that of the authority on whose systems the records are managed.</p> <p>Therefore, the Keeper agrees this element of the East Lothian <i>RMP</i> on the same improvement model basis as that of the 'host' authority.</p>	<p>East Lothian Council Legal Department. SharePoint has the ability to track versions and modifications of digital documents throughout their life cycle. It is intended that this will eventually be rolled out to East Lothian Integration Joint Board records.</p>	<p>and retain audit trail information is also noted with thanks.</p> <p>This Element remains at Amber as it relies on East Lothian Council's arrangements which host the IJB's. Update required on any change.</p>
12. Competency Framework	G	G	G	Update required on any change.	No change.	Update required on any change.
13. Assessment and Review	G	G	G	Update required on any change.	East Lothian Integration Joint Board will in association with East Lothian Council, review the Record Management Plan every 2 years.	Thank you for confirming that the Records Management plan will be reviewed biennially.
14. Shared Information	G	G	G	Update required on any change.	No change. Council Templates are being continuously updated and if required we would utilise the most recent agreements.	Thank you for confirming there have been no changes to this Element. Update required on any change.
15. Records	N/A	N/A	N/A	The IJB have confirmed to the Keeper that they do not use any third parties to provide IJB functions.	No Change.	Update required on any change.

Created or Held by Third Parties				Update required on any change.		
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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 9th July 2025. The progress update was submitted by Cat Cockburn, Operational Business Manager.

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

The Assessment Team has reviewed East Lothian 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

East Lothian Integration Joint Board continues to take its records management obligations seriously and is working to bring all elements into 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 East Lothian Integration Joint Board continue to take their statutory obligations seriously and are working hard to bring all the elements of their records management arrangements into 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

Iida Saarinen
Public Records Officer

Fiona Wilson
Chief Officer
East Lothian Health and Social Care Partnership
John Muir House, Brewery Park
Haddington, EH41 3HA

5th September 2025

Dear Ms Wilson

Progress Update Review (PUR) Final Report: East Lothian Integration Joint Board

Thank you for your authority's submission of a Progress Update Review (PUR) for assessment and comment by the Public Records (Scotland) Act 2011 Assessment Team. We commend participation by authorities in undertaking, and reporting on, regular self-assessments and reviews of their records management arrangements. We anticipate that through uptake of the PUR tool, a stronger sense of collaboration and mutual support will be achieved between authorities and the Assessment Team. This will continue to enhance the culture of records management across Scotland's public authorities.

The Assessment Team has now evaluated the submission and consider that East Lothian Integration Joint Board continues to take their statutory obligations seriously and are working to bring all the elements of their records management arrangements into full compliance with the Act and fulfil the Keeper's expectations.

I enclose the Assessment Team's findings in the accompanying Report. We would welcome you publishing this Report as an indication of the good work and progress your authority is making in its record management arrangements and to aid colleagues by sharing good practice with other authorities. The National Records of Scotland will publish the Report on its website in due course.

The PUR process is offered to all public authorities on the first anniversary of the agreement of their Records Management Plan, and thereafter every two years. The Joint Board can expect to receive its next PUR invitation in March 2027.

Yours sincerely,



Pete Wadley
Public Records Officer
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