

Public Records (Scotland) Act 2011

NHS Greater Glasgow and Clyde Assessment Report

The Keeper of the Records of Scotland

10th October 2016

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1. Public Records (Scotland) Act 2011

The Public Records (Scotland) Act 2011 (the Act) received Royal assent on 20 April 2011. It is the first new public records legislation in Scotland since 1937 and came fully into force on 1 January 2013. Its primary aim is to promote efficient and accountable record keeping by named Scottish public authorities.

The Act has its origins in *The Historical Abuse Systemic Review: Residential Schools and Children's Homes in Scotland 1950-1995* (The Shaw Report) published in 2007. The Shaw Report recorded how its investigations were hampered by poor record keeping and found that thousands of records had been created, but were then lost due to an inadequate legislative framework and poor records management. Crucially, it demonstrated how former residents of children's homes were denied access to information about their formative years. The Shaw Report demonstrated that management of records in all formats (paper and electronic) is not just a bureaucratic process, but central to good governance and should not be ignored. A follow-up review of public records legislation by the Keeper of the Records of Scotland (the Keeper) found further evidence of poor records management across the public sector. This resulted in the passage of the Act by the Scottish Parliament in March 2011.

The Act requires a named authority to prepare and implement a records management plan (RMP) which must set out proper arrangements for the management of its records. A plan must clearly describe the way the authority cares for the records that it creates, in any format, whilst carrying out its business activities. The RMP must be agreed with the Keeper and regularly reviewed.

2. Executive Summary

This report sets out the findings of the Keeper's assessment of the RMP of **NHS Greater Glasgow and Clyde** by the Public Records (Scotland) Act 2011 Assessment Team following its submission to the Keeper on **31st March 2016**.

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

The outcome of the assessment and the Keeper's decision on whether the RMP of NHS Greater Glasgow and Clyde complies with the Act can be found under section 7 of this report with relevant recommendations.

3. Authority Background

NHS Greater Glasgow and Clyde (NHSGGC) is one of 14 regional NHS Boards in Scotland. The Board provides strategic leadership and performance management for the entire local NHS system in the Greater Glasgow and Clyde area and ensures that services are delivered effectively and efficiently. Responsible for the provision and management of the whole range of health services in this area including hospitals and general practice, NHSGGC works alongside partnership organisations including local authorities and the voluntary sector. NHSGGC serves a population of 1.1 million and employs around 38,000 staff. It is the largest NHS organisation in Scotland and one of the largest in the UK. The overall purpose of the unified NHS Board is to ensure the efficient, effective and accountable governance of the local NHS system and to provide strategic leadership and direction for the system as a whole, focusing on agreed outcomes.

4. Keeper’s Assessment Process

The RMP was assessed by the Public Records (Scotland) Act Assessment Team on behalf of the Keeper. Assessors used the checklist elements listed in section 5, to establish whether NHS Greater Glasgow and Clyde’s RMP was developed with proper regard to the elements of the Model Plan and is compliant with the Act. The assessment also considered whether there was sufficient supporting evidence of such compliance.

Key:

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

Element	Present	Evidence	Notes
1. Senior Officer <i>Compulsory element</i>	G	G	<p>NHS Greater Glasgow and Clyde have identified Robert Calderwood, Chief Executive, as the individual with overall responsibility for records management in the organisation.</p> <p>Mr Calderwood has signed the 'Senior Management Responsibility' page of the <i>Records Management Plan</i> (the <i>Plan</i>) to acknowledge this.</p> <p>The overall responsibility of the Chief Executive is confirmed by the <i>Scottish Government Records Management NHS Code of Practice (Scotland)</i> (see element 3).</p> <p>The <i>Confidentiality and Data Protection Policy</i> (see element 9) the <i>Procedure for Transporting of Health Records</i> (see element 8) and other evidential documents confirm the Chief Executive as having overall responsibility for records management and data protection in the authority including data breach reporting - <i>Data Breach Policy</i> 3.1- (see element 9).</p> <p>The Keeper agrees that NHS Greater Glasgow and Clyde have identified an appropriate individual to this role as required by the Act.</p>
2. Records Manager <i>Compulsory</i>	G	G	<p>NHS Greater Glasgow and Clyde have identified Linda McAllister as Head of Health Records has been named as the Records Manager responsible and Kerry Lochrie as Deputy Health Records Manager has been named as the individual with</p>

<p><i>element</i></p>			<p>day to day responsibility for implementing the plan as these are individuals that the keepers team could contact with specific queries if necessary. Both job descriptions have been supplied.</p> <p>A letter from the GGC e-Health Director Robin Wright confirming the above has been received by the Keeper.</p> <p>The Keeper agrees that NHS Greater Glasgow and Clyde have identified two named individuals to the implementation role and agrees that their job descriptions confirm this. He has previously agreed that, although the Act would suggest one individual should be named, NHS territorial boards can nominate two due to the particular nature of their clinical/administrative hierarchy.</p>
<p>3. Policy <i>Compulsory element</i></p>	<p>G</p>	<p>G</p>	<p>The NHS Greater Glasgow and Clyde <i>Records Management Plan</i> contains a policy statement (section 3 page 6). In this statement the Board explain the purposes of robust record management, the scope of the statement and key objectives.</p> <p>The policy statement makes clear that NHS Greater Glasgow and Clyde have adopted the <i>Scottish Government Records Management NHS Code of Practice (Scotland)</i> version 2.1 dated January 2012. The <i>Plan</i> correctly links to this document published at http://www.gov.scot/Publications/2012/01/10143104/0</p> <p>The Keeper agrees the <i>Records Management Plan</i> supports the objectives of the <i>Code of Practice</i> (and the <i>Information Governance Strategy 2014-2017</i>).</p> <p>The Keeper agrees that NHS Greater Glasgow and Clyde have a records management policy statement as required by the Act and that this is available to staff.</p>

<p>4. Business Classification</p>	<p>A</p>	<p>G</p>	<p>NHS Greater Glasgow and Clyde has commissioned a project to create a service-wide <i>Business Classification Scheme</i> based on that developed by NHS National Services Scotland.</p> <p>The Keeper has been provided with the current draft of the <i>Classification Scheme</i> (dated March 2016 version 0.3) endorsed by the PRSA Group (See under General Comments below).</p> <p>The <i>Business Classification Scheme</i> will be based on a functional structure. This must remain a business decision for the authority, but the Keeper notes that a functional approach is currently considered best practice in the development of a business classification scheme.</p> <p>A sample entry from the draft would be: “Clinical Support Services/Respiratory Infections/Delivering the health protection function in the area of respiratory infections”. The record types created in carrying out this activity have yet to be included.</p> <p>The introduction to the draft scheme states “The BCS enables the effective management of records and information throughout NHSGGC. It is essential that NHSGGC properly manages its records and information in order for the organisation to comply with legislation such as the Data Protection Act 1998, Freedom of Information (Scotland) Act 2000 and Public Records (Scotland) Act 2011.”</p> <p>The <i>Plan</i> states (page 9) “With an organisation the size of NHSGGC it is inevitable that progress will be made on an incremental basis.”</p> <p>The Keeper agrees both these statement and accepts that it is too early in the project for the authority to commit to a completion date. However, the Keeper will expect to see continual progress over the next year or so.</p>
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			<p>Kerry Lochrie (see element 2) has been named as the Deputy Health Records Manager for GGC with responsibility for rolling out the improvements detailed in the <i>Plan</i> once it is agreed by the Keeper.</p> <p>The Keeper agrees this element of NHS Greater Glasgow and Clyde’s records management plan under ‘improvement model’ terms. This means that the authority has identified a gap in provision (a full business classification scheme has not yet been rolled-out in the organisation) and have put measures in place to close that gap. The Keeper’s agreement is conditional on him receiving updates as the BCS project progresses.</p>
<p>5. Retention schedule</p>	<p>G</p>	<p>G</p>	<p>NHS Greater Glasgow and Clyde have adopted the <i>SG NHS Code of Practice</i> retention schedule published at http://www.gov.scot/Publications/2012/01/10143104/0</p> <p>Staff instructions are supplied in <i>Procedure for Retention, Destruction and Archiving of Health Records</i> and <i>Guidance on the Retention and Destruction of Business Records</i> documents both of which have been supplied to the Keeper (see element 6).</p> <p>The Keeper agrees that NHS Greater Glasgow and Clyde have an approved and operational retention schedule that covers the expected record types created by a territorial health board.</p>
<p>6. Destruction Arrangements <i>Compulsory element</i></p>	<p>G</p>	<p>G</p>	<p>The <i>Records Management Policy Statement</i> (see element 3) makes the following statement: “The Board, senior management and all who work for the organisation have responsibilities to ensure that information is handled appropriately and is not retained unnecessarily beyond its life cycle.” An objective of the <i>Policy</i> is “That there</p>

			<p>are established procedures in place to record the destruction of records at the appropriate time.”</p> <p>The <i>SG NHS Code of Practice</i>, adopted by the Board (see element 3), instructs all NHS bodies that “It is the responsibility of the NHS organisation to ensure that the methods used throughout the destruction process provide appropriate safeguards against the accidental loss or disclosure of the contents of the records at every stage”.</p> <p>The <i>Plan</i> states that “The Board has procedures for managing the confidential destruction of expired records in all physical formats, in a way that is auditable and irreversible.” (page 12)</p> <p>In response to the commitments above, NHS Greater Glasgow and Clyde have published destruction procedures for health records at http://www.nhsggc.org.uk/media/236553/procedure-for-retention-and-destruction-v2-0.pdf</p> <p>They have also created staff guidance for the <i>Retention and Destruction of Business Records</i>. A screen-shot has been supplied showing staff access to this policy.</p> <p>The destruction procedures set out in these guidance document are as follows:</p> <p><u>Paper (internal)</u>: Staff instructions supplied to the Keeper show that arrangements should be made so that “any confidential material is shredded by a reputable contractor. Those who comply with BS EN 15713:2009 show that they meet certain standards in the vetting of staff; the security of premises; the standard of shredding and the security of premises and waste in transit. Procurement can advise on current contractors.” A destruction certificate has been supplied as evidence that this arrangement is in operation.</p>
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			<p><u>Paper (external)</u>: NHS Greater Glasgow and Clyde store semi-current records with third parties. Evidence has been supplied to the Keeper that destruction arrangements have been agreed with these commercial storage companies.</p> <p><u>Electronic</u>: Guidance is issued to staff on the destruction of electronic files and e-mails. The Keeper has been provided with <i>Procedures for the Destruction of Records</i> guidance document, <i>Procedure for the Retention, Archiving and Destruction of Health Records</i> and other staff guidance as evidence of this statement. A screen-shot has been supplied showing staff access to this policy.</p> <p><u>Hardware</u>: The <i>Plan</i> states (page 12) “When systems are migrated to new hardware, or desktop equipment is replaced, redundant data/disks are destroyed securely through a service procured from an external contractor.” Equipment destruction certificates from the third party have been provided as evidence that this arrangement is operational.</p> <p><u>Back-ups</u>: NHS Greater Glasgow and Clyde, quite properly, back-up electronic records for business continuity purposes (see element 10). Back-up scheduling has been shared with the Keeper and he agrees that this allows control over how long back-up copies of records are held.</p> <p>The Keeper agrees that NHS Greater Glasgow & Clyde have procedures in place to ensure the secure and irretrievable destruction of records, in all formats, when appropriate as required by the Act.</p>
<p>7. Archiving and Transfer <i>Compulsory element</i></p>	<p>G</p>	<p>G</p>	<p>NHS Greater Glasgow state that “Those business records deserving of permanent retention (e.g. because they are of long-term value for legal, epidemiological or historical purposes) should be offered for deposit with the Health Board’s Archive Service” (<i>Retention and Destruction of Business Records page 2</i>).</p>

			<p>To ensure this objective is met, NHS Greater Glasgow and Clyde have an <i>Archive Policy</i> which has been supplied to the Keeper. This is the version dated July 2014.</p> <p>NHS Greater Glasgow and Clyde operate their own archive operating as an independent unit hosted within Glasgow University Archives facility. The health board employs its own archivist. This procedure is well established and the Keeper is familiar with the arrangement.</p> <p>The Keeper agrees that NHS Greater Glasgow and Clyde have identified a suitable repository for the permanent preservation of historically important records and have arrangements in place to transfer records to that repository.</p>
<p>8. Information Security <i>Compulsory element</i></p>	<p>G</p>	<p>G</p>	<p>NHS Greater Glasgow and Clyde have an <i>Information Technology Security Policy (IT Security Policy)</i> which has been supplied to the Keeper. This is version 2.3 approved by the IG Steering Group (see under General Comments below) September 2015.</p> <p>The <i>IT Security Policy</i> is published at: http://www.nhsggc.org.uk/media/236731/it-security-policy.pdf</p> <p>The Director responsible for the <i>IT Security Policy</i> is Robin Wright (see element 2).</p> <p>NHS Greater Glasgow and Clyde have a <i>Procedure for Security for Records Storage Areas (Records Storage Security)</i> which has been supplied to the Keeper. This is the version last amended in September 2014. This document is primarily aimed at Clinical Records (the majority of paper records held by the Board are clinical). The Keeper has been provided separately with a statement confirming that similar and proportionate security is applied to corporate records in the authority.</p>

			<p>The <i>Records Storage Security</i> procedures are published at: http://www.nhsggc.org.uk/media/236747/procedure-for-security-of-health-records-storage-areas.pdf</p> <p>Information security in NHS Greater Glasgow and Clyde is supported by a suite of supporting policies and procedures such as the <i>Information Governance Framework</i> (supplied to the Keeper – version 3 April 2014) and the <i>Procedure for Transporting of Health Records</i> (dated September 2014)</p> <p>Staff training on information security is supplied (see element 12)</p> <p>Staff have to agree to abide by set security standards before they can access Greater Glasgow and Clyde’s IT systems.</p> <p>NHS Greater Glasgow and Clyde publish their <i>Data Breach Policy</i> (see element 9). This <i>Policy</i> makes it clear that Directors and Heads of Department are responsible for information security in their business areas (<i>Breach Policy</i> section 3.5).</p> <p>The Keeper agrees that NHS Greater Glasgow and Clyde have procedures in place that appropriately ensure information security in the authority.</p>
9. Data Protection	G	G	<p>NHS Greater Glasgow and Clyde have a <i>Confidentiality and Data Protection Policy</i> which has been supplied to the Keeper. This is version 2.0 dated July 2014.</p> <p>This <i>Policy</i> is published at http://www.nhsggc.org.uk/media/236743/14-jul-02-dp-confidentiality-policy-final.pdf</p> <p>The <i>Policy</i> explains the (current) 8 principles of data protection.</p>

			<p>The authority is registered with the Information Commissioner: Z8522787</p> <p>The authority has a data protection page on its website at http://www.nhsggc.org.uk/patients-and-visitors/faqs/data-protection-privacy/ This page includes information regarding subject access requests.</p> <p>NHS Greater Glasgow and Clyde publish a <i>Data Breach Policy</i> at http://www.nhsggc.org.uk/media/236744/15-nov-06-data-breach-policy-updated.pdf</p> <p>The <i>Confidentially and Data Protection Policy</i> (section 5) gives the following commitment at “In order to ensure both new and current staff continue to receive appropriate training in data protection and confidentiality, NHS GGC will ensure there is a comprehensive training and awareness programme in place” (see element 12).</p> <p>NHS Greater Glasgow and Clyde have provided the confidentiality clause as it appears in staff contracts as evidence that compliance with the principles of data protection is part of the terms and conditions imposed on employees.</p> <p>The Data Protection Act 1998 is specifically mentioned in the <i>Information Technology Security Policy (IT Security Policy)</i> (see element 8).</p> <p>The Keeper agrees that NHS Greater Glasgow and Clyde have properly considered their responsibilities under the Data Protection Act 1998.</p>
10. Business Continuity and Vital Records	G	G	<p>NHS Greater Glasgow and Clyde operate an overall <i>Business Continuity Strategy</i> supported by individual <i>Local Continuity Plans</i>. The Keeper has been provided with the template from which a local plan can be created (version 1.3 approved by the Strategic Civil Contingencies Group in April 2015). The Keeper agrees that this template prompts local service areas to consider recovery of records as part of their</p>

			<p>continuity planning.</p> <p>Furthermore the authority has provided a sample <i>Continuity Plan</i> from a local service area, created following that template. This sample has been redacted. The Keeper agrees that this redaction is entirely appropriate.</p> <p>The <i>Plan</i> gives examples of vital records, but correctly notes that “All records are of importance to NHSGGC” and goes on to explain the back-up procedure for electronic records.</p> <p>The Keeper agrees that NHS Greater Glasgow and Clyde includes the recovery of records as part of its business continuity planning and that they have also considered which records might be considered vital in pursuing their functions.</p>
11. Audit trail	G	G	<p>Health Records: NHS Greater Glasgow and Clyde have supplied the Keeper with their <i>Procedure for Health Records Tracking</i>. This shows that line of Business systems in clinical areas record, in detail, movement and access to records. The <i>Plan</i> (page 30) states that paper records are also listed and tracked electronically.</p> <p>Corporate Records: NHS Greater Glasgow and Clyde have adopted version control and naming conventions for electronic records from the Scottish Government’s e-health programme (version 2.8 Sept. 2015) and bespoke guidance for naming admin records (supplied) and apply these when creating their corporate records. A screen-shot has been provided as evidence that staff have access to guidance documents.</p> <p>The Keeper notes that tracking records and confirming document versions will be greatly enhanced when the <i>Business Classification Scheme</i> is fully rolled-out (see element 4). However, he is content that procedures have been put in place to encourage standardisation of document naming and version control which should</p>

			<p>facilitate tracking records in the meantime.</p> <p>The Keeper agrees that NHS Greater Glasgow and Clyde have procedures in place that allow records to be located and to ensure that the correct version is identified.</p>
12. Competency Framework for records management staff	G	G	<p>The SG NHS Code of Practice states (section 3) that “the records management function should be recognised as a specific corporate responsibility within every NHS organisation. It should provide a managerial focus for records of all types in all formats, including electronic records, throughout their lifecycle, from planning and creation through to ultimate disposal. It should have clearly defined responsibilities and objectives, and necessary resources to achieve them”.</p> <p>NHS Greater Glasgow and Clyde have provided the job descriptions for the individuals identified at element 2 and the Keeper agrees that these show responsibility for implementing the <i>Plan</i> and for</p>
13. Assessment and Review	G	G	<p>The Act requires a scheduled public authority to “keep its records management plan under review” (part 1 5.1 (a)).</p> <p>NHS Greater Glasgow and Clyde have committed to review their plan annually and explained that this will be carried out by the Director of eHealth (see element 2). He reports his findings to the Whole System Directors Group.</p> <p>A Board Statement regarding the methodology under which aspects of the Plan will be reviewed has been received separately by the Keeper of the Records of Scotland.</p> <p>The Keeper acknowledges that policies and procedures submitted in evidence have review dates included in their control sheets and commends this:</p>

			<p>The <i>Procedure for Retention, Destruction and Archiving of Health Records</i> document is due for review by July 2016.</p> <p>The <i>Procedure for Transporting of Health Records</i> and the <i>Records Storage Security</i> procedures (see element 8) and the <i>Procedure for Health Records Tracking</i> (see element 11) are all due for review by September 2016.</p> <p>The <i>Internet Acceptable Use Policy</i> is due for review by October 2016.</p> <p>The <i>Mobile Computing Devices and Media Policy</i> is due for review by January 2017.</p> <p>The <i>Information Governance Strategy</i>, the <i>Archive Policy</i> (see element 7) and the <i>Confidentiality and Data Protection Policy</i> (see element 9) are due for review by July 2017.</p> <p>The <i>Email Usage Policy</i> is due for review by September 2017.</p> <p>The <i>Information Technology Security Policy</i> (see element 8) should be reviewed by November 2017.</p> <p>Coincidentally, the <i>Information Governance Framework</i> and the <i>Procedures for Authorisation to Access Staff Files/Emails</i> are due to be reviewed during the period of this assessment. In order to keep the submission current, can NHS Greater Glasgow and Clyde please submit any new version of these document when responding to the Keeper’s Interim Report or as soon as possible otherwise?</p> <p>NHS Greater Glasgow and Clyde’s registration with the Information Commissioner (see element 9) must be renewed before 31 March 2017.</p>
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			<p>The Keeper agrees that NHS Greater Glasgow and Clyde have process in place to review the implementation of the Plan as required by the Act.</p>
<p>14. Shared Information</p>	<p>G</p>	<p>G</p>	<p>The <i>Plan</i> (section 14) states: “Sharing Information is a core NHS Scotland activity and takes place in line with the Data protection Act 1998 and related privacy legislation, together with the Caldicott principles.”</p> <p>With this in mind NHS Greater Glasgow and Clyde conduct information sharing according to formal protocols. Several examples of information sharing protocols (ISPs) have been provided to the Keeper. One such is http://www.nhsggc.org.uk/media/236582/information-sharing-protocol-nhs-scotland-and-sps1.pdf</p> <p>The Keeper agrees that this ISP considers information governance at the outset as required by this element.</p> <p>NHS Greater Glasgow and Clyde have shared a training module in the creation of information sharing protocols with the Keeper and provided the template protocol that will be used.</p> <p>The use of information sharing protocols is referred to in the <i>Information Governance Framework</i> (section 3).</p> <p>The Keeper agrees that NHS Greater Glasgow and Clyde properly consider information governance when entering into arrangements to share information with third parties.</p>

Version

This assessment is on the *Records Management Plan* (the *Plan*) of NHS Greater Glasgow and Clyde V2.0 Approved 6th October 2016.

The *Plan* is publically available at <http://www.nhsggc.org.uk/media/236906/rmp-approved-version-1-0-30th-march-2016.pdf>

Third Parties

The Act makes it clear that records created by a contractor in carrying out a scheduled authority's functions are public records (Part 1 section 3.1 (b)).

At several points the *Plan* and policies submitted in evidence correctly indicates that clauses therein apply to third parties carrying out the functions of NHS Greater Glasgow and Clyde under contract. Private Hospitals are specifically mentioned.

NHS Greater Glasgow and Clyde have made the following statement on this issue: "Sharing Data with Third Parties document and the DPA confidentiality clauses document has been added into element 14 as evidence, these are currently under review, updated versions will be sent on when finalised". The Keeper acknowledges he has received the relevant evidence and looks forward to the updated versions when approved.

Public Records Act Group

In response to the demands of the Act, NHS Greater Glasgow and Clyde set up a Public Records Act Group acting under the Director of e-health (**see element 2**). This group approved the draft *Business Classification Scheme* (**see element 4**)

Information Governance Steering Group

The remit of the IG Steering Group states that it will "prepare an action plan covering each of the key elements in the governance of personal information, in particular Caldicott requirements, provisions of the Data Protection Act (DPA), conformance with the Public Records (Scotland) Act 2011, IT Security and the physical security of premises where personal information is held".

The IG Steering Group is responsible for the approval of key policies and procedures such as: The *Archives Policy* (**see element 7**) the *Data Breach Policy* (**see element 9**), the *Mobile Computing Devices and Media Policy*, the *Procedures for Authorisation to Access Staff Files/Emails* and the *Email Usage Policy*. It is also responsible for responding to data breaches (*Data Breach Policy* section 3.4).

The IG Steering Group, which meets quarterly, has the Plan as a standing agenda item.

This group is clearly of fundamental importance to records management in the authority and the Keeper thanks NHS Greater Glasgow and Clyde for including information about its work in their submission.

6. Keeper's Summary

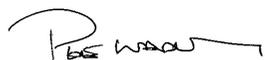
Elements 1 - 14 that the Keeper considers should be in a public authority records management plan have been properly considered by NHS Greater Glasgow and Clyde. Policies and governance structures are in place to implement the actions required by the plan.

7. Keeper's Determination

Based on the assessment process detailed above, the Keeper **agrees** the RMP of **NHS Greater Glasgow and Clyde**.

The Keeper recommends that NHS Greater Glasgow and Clyde should publish its agreed RMP as an example of good practice within the authority and the sector.

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



.....
Pete Wadley
Public Records Officer

.....
Robert Fotheringham
Public Records Officer

8. Endorsement of Report by the Keeper of the Records of Scotland

The report has been examined and is endorsed under the signature of the Keeper of the Records of Scotland as proof of compliance under section 1 of the Public Records (Scotland) Act 2011, and confirms formal agreement by the Keeper of the RMP as submitted by NHS Greater Glasgow and Clyde. In agreeing this RMP, the Keeper expects NHS Greater Glasgow and Clyde to fully implement the agreed RMP and meet its obligations under the Act.



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Tim Ellis
Keeper of the Records of Scotland