SUBMISSION FROM NHS BORDERS

1. Thank you for the invitation to comment on the contents of the Public Records (Scotland) Bill. The principles of the Bill are sound, and the introduction of a Records Management model plan as part of a suite of guidance and best practice advice to authorities and any private organisation supplying services on behalf of public authorities, is to be welcomed. We in NHS Borders were pleased to recently receive Version 2.0 of the Records Management: NHS Code of Practice (Scotland) under CEL 31 (2010) - which offers the NHS useful reference and guidance on this topic.

2. In an age of proliferation of desktop computers it has become very, if not too easy to create all classes of documents, and unless appropriate structures are in place it can be difficult to ensure both version control, and retention of these for appropriate periods under the existing legislation and guidance.

3. The main point of concern is the definition of "records" in section 12 as "meaning anything in which information is recorded in any form," as this could make the task of records management in the context of the act both daunting and potentially expensive.

4. Notwithstanding this being a period when public finance is limited, it is nevertheless important that key records are maintained where appropriate, in a manner that aids easy reference when required. Assuming that the Bill’s provisions are broadly accepted, there may be an opportunity for efficiency and efficacy for records management within Scotland to be organised in a similar manner across the public sector.

5. We have no additional comments on the consultation the Scottish Government carried out prior to the introduction of the Bill. NHS Borders did submit a response to the consultation document which is available to see on the Scottish Government website.

Dr Ross Cameron
Medical Director/Chair of Information Governance Committee
26 November 2010