SUPPLEMENTARY SUBMISSION FROM BARNARDO’S SCOTLAND

Tendering

1. The extent to which records management plans are considered during the tendering process currently varies from tender to tender but Barnardo's are usually asked to demonstrate that we have robust policies, procedures and systems in place for the management of records created under the contract. We have in place a corporate records management policy which takes into account the regulations that apply across the four UK nations and ensures that staff can be sure that records are managed in line with policy.

2. As part of the tender process Barnardo's will submit its record management policy along with all the other required documents for consideration. We also routinely describe our IT Case Management System and its associated electronic outcomes framework. We have always had very positive feedback on this aspect of our tenders and know that this is an area of that we consistently score highly on in the tendering process.

Multiple funding streams

3. We have a number of services that operate in multiple local authority areas or who have funding from more than one statutory agency. At the moment we work to our corporate records management plan and provide that to those agencies as part of the due diligence process when we are contracted. This has always proven more than adequate to date. Where our concerns arise is that under the Bill as it is currently drafted, that relationship would change with the contracting authority taking the lead. The result would be significant shift in the current relationship where as a contractor we provide a standard policy which is approved by the commissioning agency, to a position where the commissioning agency would stipulate the policy framework. In such a situation, we would have no way of ensuring that our staff teams are working to clear and consistent standards across the organisation due to different contractual requirements. This would be very difficult to quality control and would also result in significant costs due to staff training and amendments to our IT systems that may be required as a result. Rather than creating the consistency in practice that the Bill seeks to bring about it would have quite the opposite effect. We do agree that it is absolutely right and appropriate that commissioning agencies bear the responsibility for ensuring that the records management plans of contractors are sufficient however, the regime proposed by the bill would result in wide variances in what contractors are asked to work to.

Core standards

4. The Bill as currently drafted would not require public authorities to work to the same set of core standards, it would instead allow each individual authority to
produce different plans with different standards. The aim of the Bill is to achieve greater consistency in records management but we do not believe that this will be borne out unless public bodies are required to work to a common records management plan across Scotland. This position was supported by the Information Commissioner in his evidence to the Committee. A clear example of the result of not giving a common model was in the development of single shared assessments by local authorities several years ago. The Scottish Government developed clear guidelines on what a single shared assessment was and what should be included within it but did not provide a common model to allow flexibility for authorities. The result was that every authority interpreted the guidance differently and produced quite different assessment documents and processes. A subsequent audit by the Transformational Government Unit found that not only was practice varied between authorities but that in some authorities multiple versions of the single shared assessment existed within care groups.

**Impact**

5. We feel that without a common model across the nation that history would be likely to repeat itself. The result of this for organisations like ours would be that our staff would potentially be working to a number of different policies as part of the same service delivery. Not only would this be very difficult to manage but could also lead to inconsistencies in how the service is delivered to service users if, for example, authority A required information to be recorded and delivered to them in a different way to authority B. At its most extreme, we could have services where staff would be working to multiple records management plans some of which might contradict the others. This would not only be very resource intensive to manage it would also make our internal inspection of quality in services extremely cumbersome. Ultimately the requirements of managing multiple records management plans within the same service would have the effect of taking staff time away from direct delivery, it would lead to confusion around recording standards and would have a negative impact on the quality of the service delivered to service users.