

**Report To:** Inverclyde Integration Joint Board    **Date:** 29 January 2019

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Partnership (HSCP)    **Report No:** IJB/02/2019/HW

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**Subject:** **INVERCLYDE IJB RECORDS MANAGEMENT PLAN**

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## **1.0 PURPOSE**

- 1.1 IJBs are required to submit a Records Management Plan (RMP) to the Keeper of the Records of Scotland. The RMP sets out how Inverclyde IJB's records will be created and managed in line with national policy. This is a responsibility which all public bodies must fulfil.

## **2.0 SUMMARY**

- 2.1 The RMP will be submitted for agreement by the Keeper of the Records of Scotland under Section 1 of the Public Records (Scotland) Act 2011 by 28<sup>th</sup> February 2019.

## **3.0 RECOMMENDATIONS**

- 3.1 The Integration Joint Board is asked to approve the content of the attached RMP and accompanying Memorandum of Understanding and give approval that this can now be formally submitted to the Keeper of the Records of Scotland.
- 3.2 Integration Joint Board Members are asked to consider if they require or would like further General Data Protection Regulation (GDPR) training, and advise the Chief Officer, who will then make arrangements for training that will meet specific requirements.

**Louise Long**  
Corporate Director, (Chief Officer)  
Inverclyde HSCP

## 4.0 BACKGROUND

### 4.1 Legislation

The IJB is obliged to submit and maintain a Records Management Plan (RMP) as defined in and in accordance with Part 1 of the Public Records (Scotland) Act 2011. The Act requires named public authorities to submit a RMP to be agreed by the Keeper of the Records of Scotland.

Every authority to which this Part applies must:

- prepare a plan (a "records management plan") setting out proper arrangements for the management of the authority's public records,
- submit the plan to the Keeper for agreement, and
- ensure that its public records are managed in accordance with the plan as agreed with the Keeper.

An authority's records management plan must:

- identify the individual who is responsible for management of the authority's public records, and
- (if different) identify the individual who is responsible for ensuring compliance with the plan,
- Include provision about the procedures to be followed in managing the authority's public records, maintaining the security of information contained in the authority's public records, and the archiving and destruction or other disposal of the authority's public records.

### 4.2 Content of the Records Management Plan (RMP) and Memorandum of Understanding (MoU)

NHS Greater Glasgow and Inverclyde Council already have agreed RMPs in place. IJBs were added to the Act's schedule by the Public Bodies (Joint Working) (Scotland) Act 2014.

Formal notification was received in September 2018 from National Records Scotland that the Keeper was inviting Inverclyde IJB to submit its RMP by 5<sup>th</sup> January 2019. We wrote to the Keeper to request an extension to allow the RMP to come to the IJB members for approval. The Keeper has agreed to extend the invitation to 28<sup>th</sup> February 2019.

The attached RMP and Memorandum of Understanding (MoU) set out the arrangements for the management of the IJB's records and the relationship with NHS Greater Glasgow and Inverclyde Council's respective RMPs.

As the IJB does not hold any personal information about either patients/clients or staff, the RMP relates to the IJB committees and groups (Integration Joint Board, Audit Committee and Strategic Planning Group) and plans and policies such as the Annual Performance Report, Integration Scheme and the Strategic Plan. All of this information is already in the public domain via the IJB and Health and Social Care pages on Inverclyde Council's website:-

<https://www.inverclyde.gov.uk/meetings/committees/57>

<https://www.inverclyde.gov.uk/health-and-social-care>

Inverclyde Council's Business Classification Scheme is used to organise the IJB's records, as all IJB records are currently managed and stored by Inverclyde Council. In terms of evidence that the IJB meets the requirements of each element of the RMP, links to NHS Greater Glasgow and Inverclyde's Council's RMPs are used where appropriate. This follows the advice given by National Records of Scotland, which provided guidance and support throughout the drafting of the RMP and MoU.

Inverclyde IJB is committed to being organised internally, as well as ensuring its records are readily available externally via the IJB's pages on Inverclyde Council's website.

The RMP and MoU will be submitted for agreement by the Keeper of the Records of Scotland under Section 1 of the Public Records (Scotland) Act 2011.

## 5.0 IMPLICATIONS

### 5.1 POLICY

Information underpins the IJB's over-arching strategic objectives and helps it meet its strategic outcomes.

Information supports it to:

- Demonstrate accountability.
- Provide evidence of actions and decisions.
- Assist with the smooth running of business.
- Help build organisational knowledge.
- 

Good recordkeeping practices lead to greater productivity as less time is taken to locate information. Well managed records will help the IJB with:

- Better decisions based on complete information.
- Smarter and smoother work practices.
- Consistent and collaborative workgroup practices.
- Better resource management.
- Support for research and development.
- Preservation of vital and historical records

## FINANCE

### 5.2 Financial Implications:

There are no financial implications arising from this report.

One off Costs

Cost Centre	Budget Heading	Budget Years	Proposed Spend this Report £000	Virement From	Other Comments
N/A					

Annually Recurring Costs/ (Savings)

Cost Centre	Budget Heading	With Effect from	Annual Net Impact £000	Virement From (If Applicable)	Other Comments
N/A					

## LEGAL

5.3 There are no legal issues within this report.

## HUMAN RESOURCES

5.4 There are no human resources issues within this report.

## EQUALITIES

5.5 Has an Equality Impact Assessment been carried out?

	YES
x	NO – This report does not introduce a new policy, function or strategy or recommend a change to an existing policy, function or strategy. Therefore, no Equality Impact Assessment is required.

5.5.1 How does this report address our Equality Outcomes?

Equalities Outcome	Implications
People, including individuals from the above protected characteristic groups, can access HSCP services.	None
Discrimination faced by people covered by the protected characteristics across HSCP services is reduced if not eliminated.	None
People with protected characteristics feel safe within their communities.	None
People with protected characteristics feel included in the planning and developing of services.	None
HSCP staff understand the needs of people with different protected characteristic and promote diversity in the work that they do.	None
Opportunities to support Learning Disability service users experiencing gender based violence are maximised.	None
Positive attitudes towards the resettled refugee community in Inverclyde are promoted.	None

## CLINICAL OR CARE GOVERNANCE IMPLICATIONS

5.6 There are no clinical or care governance implications arising from this report.

## 5.7 NATIONAL WELLBEING OUTCOMES

How does this report support delivery of the National Wellbeing Outcomes?

National Wellbeing Outcome	Implications
People are able to look after and improve their own health and wellbeing and live in good health for longer.	None
People, including those with disabilities or long term conditions or who are frail are able to live, as far as reasonably practicable, independently and at home or in a homely setting in their community	None
People who use health and social care services have positive experiences of those services, and have their dignity respected.	None
Health and social care services are centred on helping to maintain or improve the quality of life of people who use those services.	None

Health and social care services contribute to reducing health inequalities.	None
People who provide unpaid care are supported to look after their own health and wellbeing, including reducing any negative impact of their caring role on their own health and wellbeing.	None
People using health and social care services are safe from harm.	None
People who work in health and social care services feel engaged with the work they do and are supported to continuously improve the information, support, care and treatment they provide.	None
Resources are used effectively in the provision of health and social care services.	None

## **6.0 CONSULTATION**

6.1 This report has been prepared by the Chief Officer, Inverclyde Health and Social Care Partnership (HSCP), in consultation with the Senior Management Team and colleagues from the Council's Legal Services and Committee Administration Services.

## **7.0 BACKGROUND PAPERS**

7.1 None.



## **Inverclyde Health and Social Care Integration Joint Board Records Management Plan**

**Submitted in accordance with the Public Records (Scotland) Act 2011**

This plan is fully endorsed by the Chief Officer of Inverclyde Integration Joint Board who will ensure compliance with the Public Records (Scotland) Act 2011 through the corporate implementation of this Records Management Plan.

Signed by:

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Louise Long, Chief Officer, Inverclyde Integration Joint Board

### **Document Control Information**

<b>Revision</b>	<b>Date</b>	<b>Revision Description</b>
1.0	14/01/2019	Submitted to Inverclyde Integration Joint Board
		Final version submitted to Keeper of Records of Scotland

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## **Records Management Plan**

### **Summary**

This Records Management Plan (RMP) conforms to the model Records Management Plan as set out by the Keeper of the Records of Scotland, in accordance with the provisions of the Public Records (Scotland) Act 2011. This RMP covers Inverclyde Integration Joint Board, referred to as 'the IJB' throughout.

The RMP outlines and evidences the IJB's policies and procedures regarding the creation, use, management and disposal of the public records it creates and uses in pursuance of its statutory functions.

### **In line with the model plan, the IJB's RMP addresses 14 elements:**

Element 1: Senior management responsibility

Element 2: Records manager responsibility

Element 3: Records management policy statement

Element 4: Business classification

Element 5: Retention schedule

Element 6: Destruction arrangements

Element 7: Archiving and transfer arrangements

Element 8: Information security

Element 9: Data protection

Element 10: Business continuity and vital records

Element 11: Audit trail

Element 12: Competency framework for records management staff

Element 13: Assessment and review

Element 14: Shared Information

The IJB is fully committed to compliance with the requirements of the Public Records (Scotland) Act, 2011 which came into force on the 1st January 2013. The IJB will therefore follow procedures that aim to ensure that all of its officers, employees of constituent authorities supporting its work, contractors, agents, consultants and other trusted third parties who create public records on behalf of the authority, or manage public records held by the authority, are fully aware of and abide by this plan's arrangements.



## **About the Public Records (Scotland) Act 2011**

The Public Records (Scotland) Act 2011 (the Act) came fully into force in January 2013. The Act requires names public authorities to submit a Records Management Plan (RMP) to be agreed by the Keeper of the Records of Scotland. Integration Joint Boards were added to the Act's schedule by the Public Bodies (Joint Working) (Scotland) Act 2014. This document is the Records Management Plan of Inverclyde Integration Joint Board.

This RMP sets out and evidences proper arrangements for the management of the IJB's public records and is submitted for agreement by the Keeper of the Records of Scotland under Section 1 of the Public Records (Scotland) Act 2011. It will be reviewed by the IJB annually.

<http://www.nas.gov.uk/recordKeeping/publicRecordsActIntroduction.asp>

<http://www.scottish.parliament.uk/parliamentarybusiness/Bills/22476.aspx>

## **About Integration Joint Boards**

The integration of health and social care is part of the Scottish Government's programme of reform to improve care and support for those who use health and social care services. It is one of the Scottish Government's top priorities.

The Public Bodies (Joint Working) (Scotland) Act 2014 provides the legislative framework for the integration of health and social care services in Scotland.

It will put in place:

- Nationally agreed outcomes, which will apply across health and social care, in service planning by Integration Joint Boards and service delivery by NHS Boards and Local Authorities.
- A requirement on NHS Boards and Local Authorities to integrate health and social care budgets.
- A requirement on Partnerships to strengthen the role of clinicians and care professionals, along with the third and independent sectors, in the planning and delivery of services.

## **About Inverclyde Integration Joint Board**

The Inverclyde Integration Joint Board was established under the Public Bodies (Joint Working) Scotland Act 2014. It was established by Parliamentary Order on 27 June 2015 following approval of the Inverclyde Integration Scheme by the Scottish Ministers.

From 1 April 2016, the IJB became responsible for the strategic planning and oversight of delivery of health and social care functions delegated to it by Greater Glasgow and Clyde NHS Board ("the NHS Board") and Inverclyde Council ("the Council").

**These include adult social care services, children's services, criminal justice services and adult health community and some hospital services. The area covered by the IJB is coterminous with the Inverclyde Local Authority area.**

The IJB is a body corporate (a separate legal entity). The parties to the IJB are the Council and the NHS Board. The parties agreed the Integration Scheme for Inverclyde, which sets out the delegation of functions by the Council and the NHS Board to the IJB. The IJB is commonly referred to as the Inverclyde Health and Social Care Partnership (HSCP) – this is the public facing aspect of the IJB. The IJB consists of eight voting members appointed in equal number by the NHS Board and the Council, with a number of representative, non-voting members who are drawn from the third sector, independent sector, staff, carers and service users. The IJB is advised by a number of professionals including the Chief Officer, Clinical Director, Chief Nurse and Chief Social Work Officer.

The IJB's key functions are to:

- Prepare a Plan for integrated functions that is in accordance with national and local outcomes and integration principles.
- Allocate the integrated budget in accordance with the Plan.
- Oversee the delivery of services that are within the scope of the Partnership.

Information underpins the IJB's over-arching strategic objective and helps it meet its strategic outcomes. Its information supports it to:

- Demonstrate accountability.
- Provide evidence of actions and decisions.
- Assist with the smooth running of business.
- Help build organisational knowledge.

Good recordkeeping practices lead to greater productivity as less time is taken to locate information. Well managed records will help the IJB make:

- Better decisions based on complete information.
- Smarter and smoother work practices.
- Consistent and collaborative workgroup practices.
- Better resource management.
- Support for research and development.
- Preservation of vital and historical records.

In addition we are more accountable to the public now than ever before through the increased awareness of openness and transparency within government. Knowledge and information management is now formally recognised as a function of government similar to finance, IT and communications. It is expected that the Board is fully committed to creating, managing, disclosing, protecting and disposing of information effectively and legally.

## **Review**

Section 5 (1) of the Act requires authorities to keep their plans under review to ensure its arrangements remain fit for purpose.

## **RMP Principles**

### **What does the Records Management Plan cover?**

Records management covers records of all formats and media. This includes paper and computer records; cassette, video and CD records. Records management is needed throughout the lifecycle of a record, and the process begins when the decision to create the record is taken.

### **Why is records management important?**

Records are vital for the effective functioning of the IJB: they support the decision-making; document its aims, policies and activities; and ensure that legal, administrative and audit requirements are met.

For records to perform their various functions, some form of management is needed. Management includes control over what is created, development of effective and efficient filing systems to store records, and procedures for retention of records.

### **Records management principles**

Security – Records will be secure from unauthorised or inadvertent alteration or erasure, that access and disclosure will be properly controlled and audit trails will track all use and changes. Records will be held in a robust format which remains readable for as long as records are required.

Accountability – Adequate records are maintained to account fully and transparently for all actions and decisions in particular:

- To protect legal and other rights of staff or those affected by those actions
- To facilitate audit or examination
- To provide credible and authoritative evidence

Quality – Records are complete and accurate and the information they contain is reliable and its authenticity can be guaranteed.

Accessibility – Records and the information within them can be efficiently retrieved by those with a legitimate right of access, for as long as the records are held by the organisation.

Retention and disposal – There are consistent and documented retention and disposal procedures, including provision for permanent preservation of archival records.

Training – that all staff are informed of their record-keeping responsibilities through appropriate training and guidance and if required further support as necessary.

### **Inverclyde IJB Records Management Plan**

The context of this plan is that most records including employment, service user and internal policies and procedures will continue to be managed within the parent body organisations, i.e. the NHS Board and the Council. Therefore, the RMP relates to records held directly by the IJB and records produced as part of a delegated function as such will be covered by the respective Record Management Plans of the NHS Board and the Council.

**As such, this RMP relates to the IJB committees (Integration Joint Board, IJB Audit Committee and Strategic Planning Group) and plans and policies such as the Annual Performance Report, the Integration Scheme and the Strategic Plan. All of this information is already in the public domain via the IJB and Health and Social Care pages on the Inverclyde Council Website.**

<https://www.inverclyde.gov.uk/meetings/committees/57>

<https://www.inverclyde.gov.uk/health-and-social-care>

The Inverclyde IJB Records Management Plan (RMP) is effective from 29<sup>th</sup> January 2019. The plan will be continuously reviewed and updated. Reports will be submitted annually to the Information Governance Steering Group, before formal presentation to the Integration Joint Board.

RMP Element Description	Inverclyde Integration Joint Board (IJB) Compliance Statement	Evidence
<p><b>Element 1: Senior management responsibility:</b> Section 1(2)(a)(i) of the Act specifically requires a RMP to identify the individual responsible for the management of the authority's public records. An authority's RMP <u>must</u> name and provide the job title of the senior manager who accepts overall responsibility for the RMP that has been submitted.</p> <p>It is vital that the RMP submitted by an authority has the approval and support of that authority's senior management team. Where an authority has already appointed a Senior Information Risk Owner, or similar person, they should consider making that person responsible for the records management programme. It is essential that the authority identifies and seeks the agreement of a senior post-holder to take overall responsibility for records management. That person is unlikely to have a day-to-day role in implementing the RMP, although they are not prohibited from doing so.</p> <p>As evidence, the RMP could include, for example, a covering letter signed by the senior post-holder. In this letter the responsible person named should indicate that they endorse the authority's record management policy (See Element 3).</p> <p><a href="http://www.nas.gov.uk/recordKeeping/PRSA/guidance/Element1.asp">Read further explanation and guidance about element 1 - <u>http://www.nas.gov.uk/recordKeeping/PRSA/guidance/Element1.asp</u></a></p>	<p>The Chief Officer, <b>Louise Long</b> has senior responsibility for all aspects of the IJB's Records Management, and is the corporate owner of this document.</p> <p>The Chief Officer is also the IJB's Senior Information Risk Owner (SIRO).</p> <p>The Chief Officer Chairs the Senior Management Team, which has strategic responsibility for the Health and Social Care Partnership.</p>	<p>Job profile and objectives of Chief Officer</p> <p>Board Records Management Policy, which identifies roles and responsibilities.</p> <p>Roles and responsibilities of the SIRO</p> <p>Senior management responsibility for Records Management within Inverclyde Council covered by the Records Management Plan lies with:</p> <p><b>Louise Long</b> <b>Chief Officer, Inverclyde HSCP</b> <b>Municipal Buildings</b> <b>Clyde Square</b> <b>Greenock</b></p>

RMP Element Description	Inverclyde Integration Joint Board (IJB) Compliance Statement	Evidence
<p><b>Element 2: Records manager responsibility:</b>  Section 1(2) (a)(ii) of the Act specifically requires a RMP to identify the individual responsible for ensuring the authority complies with its plan. An authority's RMP <u>must</u> name and provide the job title of the person responsible for the day-to-day operation of activities described in the elements in the authority's RMP. This person should be the Keeper's initial point of contact for records management issues. It is essential that an individual has overall day-to-day responsibility for the <u>implementation</u> of an authority's RMP. There may already be a designated person who carries out this role. If not, the authority will need to make an appointment. As with element 1 above, the RMP must name an individual rather than simply a job title. It should be noted that staff changes will not invalidate any submitted plan provided that the all records management responsibilities are transferred to the incoming post holder and relevant training is undertaken. This individual might not work directly for the scheduled authority. It is possible that an authority may contract out their records management service. If this is the case an authority may not be in a position to provide the name of those responsible for the day-to-day operation of this element. The authority must give details of the arrangements in place and name the body appointed to carry out the records management function on its behalf. It may be the case that an authority's records management programme has been developed by a third party. It is the person operating the programme on a day-to-day basis whose name should be submitted.</p> <p><a href="http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement2.asp">Read further explanation and guidance about element 2 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement2.asp</a></p>	<p>The Operational Officers responsible for records management are:  NHS GG&amp;C</p> <p>To support business continuity, the NHS' Operational Officer will have a Inverclyde Council log-in and access to the IJB's records</p> <p>Inverclyde HSCP - <b>Jeanette Hawthorn</b></p> <p>Each are able to access and manage IJB information on a daily basis</p> <p>Responsibilities include:</p> <ul style="list-style-type: none"> <li>• Managing the IJB's records;</li> <li>• Reviewing and implementing operational policies and procedures in line with the RMP;</li> <li>• Ensuring relevant health and social care staff have records management training</li> </ul>	<p>The MoU accompanying this document nominates each of these roles within the partner bodies of NHS GG&amp;C and Inverclyde Council, as the leads with operational responsibility.</p> <p>Job descriptions for each role are included as evidence to demonstrate that the named individuals have the skills required and can access all IJB records.</p> <p>The MoU sets out that the IJB's records are created and managed by the constituent body, Inverclyde Council. It indicates that the CO is satisfied that the constituent body has appropriate records management arrangements in place.</p> <p>The MoU confirms that the partner authority, Inverclyde Council creates, holds and manages into disposal all the IJB's records</p>

RMP Element Description	Inverclyde Integration Joint Board (IJB) Compliance Statement	Evidence
<p><b>Element 3: Records management policy statement:</b></p> <p>The Keeper expects each authority's plan to include a records management policy statement. The policy statement should describe how the authority creates and manages authentic, reliable and useable records, capable of supporting business functions and activities for as long as they are required. The policy statement should be made available to all staff, at all levels in the authority. The statement will properly reflect the business functions of the public authority. The Keeper will expect authorities with a wide range of functions operating in a complex legislative environment to develop a fuller statement than a smaller authority. The records management statement should define the legislative, regulatory and best practice framework, within which the authority operates and give an overview of the records management processes and systems within the authority and describe how these support the authority in carrying out its business effectively. For electronic records the statement should describe how metadata is created and maintained. It should be clear that the authority understands what is required to operate an effective records management system which embraces records in all formats.</p> <p>The records management statement should</p>	<p>Inverclyde Council and NHS GG&amp;C work in partnership, governed by the Inverclyde Integration Joint Board (IJB).</p> <p>Inverclyde IJB is responsible for the strategic planning of health and care services for the population of Inverclyde.</p> <p>The context of this plan is that most records including employment, service user and internal policies and procedures will continue to be managed in the constituent body organisations, i.e. Inverclyde Council and NHS GG&amp;C and as such will be covered by their respective record management plans.</p> <p>The records covered by this plan constitute IJB business in terms of:</p> <ul style="list-style-type: none"> <li>• IJB Meetings agendas and papers, including Directions</li> <li>• IJB Strategies and Policies, including the Annual Report, Strategic Plan and Delivery Plan</li> </ul>	<p><b>NHS GG&amp;C:</b></p> <p><a href="http://live.nhsggc.org.uk/media/243288/nhsggc-rmp-v21-july-2017.pdf">http://live.nhsggc.org.uk/media/243288/nhsggc-rmp-v21-july-2017.pdf</a></p> <p><a href="https://www.inverclyde.gov.uk/meetings/committees/57">https://www.inverclyde.gov.uk/meetings/committees/57</a></p> <p><a href="https://www.inverclyde.gov.uk/health-and-social-care">https://www.inverclyde.gov.uk/health-and-social-care</a></p>

include a description of the mechanism for records management issues being disseminated through the authority and confirmation that regular reporting on these issues is made to the main governance bodies. The statement should have senior management approval and evidence, such as a minute of the management board recording its approval, submitted to the Keeper. The other elements in the RMP, listed below, will help provide the Keeper with evidence that the authority is fulfilling its policy.

[Read further explanation and guidance about element 3 –   
http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement3.asp](http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement3.asp)

**RMP Element Description**

**Inverclyde Integration Joint Board (IJB) Compliance Statement**

**Evidence**

**Element 4: Business classification**  
The Keeper expects an authority to have properly considered business classification mechanisms and its RMP should therefore reflect the functions of the authority by means of a business classification scheme or similar.

A business classification scheme usually takes the form of a hierarchical model or structure diagram. It records, at a given point in time, the informational assets the business creates and maintains, and in which function or service area they are held. As authorities change the scheme should

As the IJB has only been in operation since 1<sup>st</sup> April 2016, the type and volume of record keeping specific to the IJB is evolving rapidly.

The IJB will follow the corporate Business Classification Scheme (BCS) adopted by Inverclyde Council which identifies its high-level functions and activities. These functions cut across the divisional structures of the Council, enabling the BCS to remain relevant in the event of structural changes to the organisation. Inverclyde Council's BCS has been updated to include IJB records.

The BCS is a localised version of the model BCS

Inverclyde Council has produced a guidance document for BCS.



be regularly reviewed and updated.

A business classification scheme allows an authority to map its functions and provides a structure for operating a disposal schedule effectively.

Some authorities will have completed this exercise already, but others may not. Creating the first business classification scheme can be a time-consuming process, particularly if an authority is complex, as it involves an information audit to be undertaken. It will necessarily involve the cooperation and collaboration of several colleagues and management within the authority, but without it the authority cannot show that it has a full understanding or effective control of the information it keeps.

Although each authority is managed uniquely there is an opportunity for colleagues, particularly within the same sector, to share knowledge and experience to prevent duplication of effort.

All of the records an authority creates should be managed within a single business classification scheme, even if it is using more than one record system to manage its records. An authority will need to demonstrate that its business classification scheme can be applied to the record systems which it operates.

[Read further explanation and guidance about element 4 -](http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement4.asp)

<http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement4.asp>

published by the Scottish Council on Archives for use by all Scottish local authorities.

This has been discussed and agreed as a sensible approach by NHS GG&C and Inverclyde Council.

IJB records are part of the Committee Management System and as such have permanent retention status.

RMP Element Description	Inverclyde Integration Joint Board (IJB) Compliance Statement	Evidence
<p><b>Element 5: Retention schedules</b> Section 1(2) (b)(iii) of the Act specifically requires a RMP to include provision about the archiving and destruction or other disposal of the authority's public records.</p> <p>An authority's RMP <u>must</u> demonstrate the existence of and adherence to corporate records retention procedures. The procedures should incorporate retention schedules and should detail the procedures that the authority follows to ensure records are routinely assigned disposal dates, that they are subsequently destroyed by a secure mechanism (see element 6) at the appropriate time, or preserved permanently by transfer to an approved repository or digital preservation programme (See element 7).</p> <p>The principal reasons for creating retention schedules are:</p> <ul style="list-style-type: none"> <li>• to ensure records are kept for as long as they are needed and then disposed of appropriately</li> <li>• to ensure all legitimate considerations and future uses are considered in reaching the final decision.</li> <li>• to provide clarity as to which records are still held by an authority and which have been deliberately destroyed.</li> </ul> <p>"Disposal" in this context does not</p>	<p>A retention schedule is a list of records for which pre-determined disposal dates have been established.</p> <p>The IJB must, however, be able to demonstrate it remains responsible for its records under the constituent bodies' schedule. It must be able to demonstrate that disposal periods set against its records under the partner schedule were taken by the Board, in collaboration with the partner body. The partner body's retention policies and procedures (and records manager(s)) will assist the Board in making business-based disposal decisions against its records. These must take into consideration the IJB's statutory obligations.</p>	<p><b>NHS GG&amp;C</b></p> <p>NHS GG&amp;C Record Management Plan includes Retention and Destruction of Records Policy. NHS Code of Practice</p> <p><a href="http://www.gov.scot/Publications/2012/01/10143104/0">http://www.gov.scot/Publications/2012/01/10143104/0</a></p> <p><a href="#">Retention and Destruction of Records Guidance</a></p> <p><a href="http://www.nhsggc.org.uk/media/236728/record-retention-guidance-v2-03-08-2015.docx">www.nhsggc.org.uk/media/236728/record-retention-guidance-v2-03-08-2015.docx</a></p> <p>NHS Greater Glasgow &amp; Clyde Archive Policy</p> <p><a href="http://www.nhsggc.org.uk/media/236727/nhsggc-archive-policy-july-2014.docx">www.nhsggc.org.uk/media/236727/nhsggc-archive-policy-july-2014.docx</a></p> <p><b><u>Inverclyde Council</u></b></p> <ul style="list-style-type: none"> <li>• Policy and Resources Committee - 24 March 2015</li> </ul>

necessarily mean destruction. It includes any action taken at the agreed disposal or review date including migration to another format and transfer to a permanent archive. A retention schedule is an important tool for proper records management. Authorities who do not yet have a full retention schedule in place should show evidence that the importance of such a schedule is acknowledged by the senior person responsible for records management in an authority (see element 1). This might be done as part of the policy document (element 3). It should also be made clear that the authority has a retention schedule in development.

An authority's RMP must demonstrate the principle that retention rules are consistently applied across all of an authority's record systems.

[Read further explanation and guidance about element 5\\_-  
http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement5.asp](http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement5.asp)

**RMP Element Description**

**Inverclyde Integration Joint Board (IJB)  
Compliance Statement**

**Evidence**

**Element 6: Destruction arrangements**  
Section 1(2) (b)(iii) of the Act specifically requires a RMP to include provision about the archiving and destruction, or other disposal, of an authority's public records.

It is not always cost-effective or practical for an authority to securely destroy records in-house. Many authorities engage a contractor to destroy records and ensure the process is supervised and documented.

**NHS GG&C**  
NHS Greater Glasgow & Clyde Management Plan includes Retention and Destruction of Records Policy

An authority's RMP must demonstrate that proper destruction arrangements are in place.

A retention schedule, on its own, will not be considered adequate proof of disposal for the Keeper to agree a RMP. It must be linked with details of an authority's destruction arrangements. These should demonstrate security precautions appropriate to the sensitivity of the records. Disposal arrangements must also ensure that all copies of a record – wherever stored – are identified and destroyed.

Read further explanation and guidance about element

6 <http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement6.asp>

As such, the destruction of IJB records, in all formats, will be undertaken by Inverclyde Council.

All IJB Records will be held electronically on Inverclyde Council's system so no hard copies will require destruction.

At this stage there is only a limited volume of records specific to the IJB.

[http://www.staffnet.ggc.scot.nhs.uk/Corporate%20Services/eHealth/PoliciesandProcedures/Documents/PROCEDURE%20FOR%20RETENTION%20AND%20DESTRUCTION%20\(Nov%2018\).pdf](http://www.staffnet.ggc.scot.nhs.uk/Corporate%20Services/eHealth/PoliciesandProcedures/Documents/PROCEDURE%20FOR%20RETENTION%20AND%20DESTRUCTION%20(Nov%2018).pdf)

**Inverclyde Council:**

**Inverclyde Corporate Retention Schedule:**

<https://www.inverclyde.gov.uk/assets/attach/3723/Policy%20for%20the%20Retention%20and%20Disposal%20of%20Documents%20and%20Records%20Paper%20and%20Electronic%201.2.pdf>

<b>RMP Element Description</b>	<b>Inverclyde Integration Joint Board (IJB) Compliance Statement</b>	<b>Evidence</b>
<p><b>Element 7: Archiving and transfer arrangements</b></p> <p>Section 1(2)(b)(iii) of the Act specifically requires a RMP to make provision about the archiving and destruction, or other disposal, of an authority's public records.</p> <p>An authority's RMP <u>must</u> detail its archiving and transfer arrangements and ensure that records of enduring value are deposited in an appropriate archive repository. The RMP will detail how custody of the records will transfer</p>	<p>All IJB Records will be held electronically on Inverclyde Council's system so no hard copies will be archived.</p> <p>At this stage there is only a limited volume of records specific to the IJB.</p>	<p>The agreed arrangement between the NHS Board and Inverclyde Council for IJB records to be included in the archiving and transferring arrangements established by Inverclyde Council.</p> <p><a href="https://www.inverclyde.gov.uk/assets/attach/3723/Policy%20for%20the%20Retention%20and%20Disposal%20of%20Documents%20and%20Records%20Paper%20and%20Electronic%201.2.pdf">https://www.inverclyde.gov.uk/assets/attach/3723/Policy%20for%20the%20Retention%20and%20Disposal%20of%20Documents%20and%20Records%20Paper%20and%20Electronic%201.2.pdf</a></p>

from the operational side of the authority to either an in-house archive, if that facility exists, or another suitable repository, which must be named. The person responsible for the archive should also be cited.

Some records continue to have value beyond their active business use and may be selected for permanent preservation. The authority's RMP must show that it has a mechanism in place for dealing with records identified as being suitable for permanent preservation. This mechanism will be informed by the authority's retention schedule which should identify records of enduring corporate and legal value. An authority should also consider how records of historical, cultural and research value will be identified if this has not already been done in the retention schedule. The format/media in which they are to be permanently maintained should be noted as this will determine the appropriate management regime.

Read further explanation and guidance about element 7

<http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement7.asp>

[ctronic%201.2.pdf](#)

RMP Element Description	Inverclyde Integration Joint Board (IJB) Compliance Statement	Evidence
<p><b>Element 8: Information Security</b> Section 1(2) (b)(ii) of the Act specifically requires a RMP to make provision about the archiving and destruction or other disposal of the authority's public records.</p> <p>An authority's RMP <u>must</u> make provision for the proper level of security for its public records.</p> <p>All public authorities produce records that are sensitive. An authority's RMP <u>must</u> therefore include evidence that the authority has procedures in place to adequately protect its records. Information security procedures would normally acknowledge data protection and freedom of information obligations as well as any specific legislation or regulatory framework that may apply to the retention and security of records.</p> <p>The security procedures <u>must</u> put in place adequate controls to prevent unauthorised access, destruction, alteration or removal of records. The procedures will allocate information security responsibilities within the authority to ensure organisational accountability and will also outline the mechanism by which appropriate security classifications are linked to its business classification scheme.</p>	<p>Information security is the process by which an authority protects its records and ensures they remain available. It is the means by which an authority guards against unauthorised access and provides for the integrity of the records. Robust information security measures are an acknowledgement that records represent a risk as well as an asset. A public authority should have procedures in place to assess and contain that risk.</p> <p>The IJB will rely on NHS GG&amp;C and Inverclyde Council arrangements in terms of systems, devices, information sharing platforms etc.</p> <p>All staff will remain employees of either NHS GG&amp;C or Inverclyde Council. As such they will be subject to the policies and procedures of their employer, i.e. NHSGG&amp;C Information Security Policy or Inverclyde's Security policies.</p>	<p><b>NHS GGC Information Security Policy</b></p> <p>NHS GGC Policies:</p> <p>NHSGGC IT Security Policy</p> <p><a href="http://www.nhsggc.org.uk/media/236731/it-security-policy.pdf">http://www.nhsggc.org.uk/media/236731/it-security-policy.pdf</a></p> <p><b>Inverclyde Council:</b></p> <ul style="list-style-type: none"> <li>• Inverclyde Council Information Governance Steering Group Remit</li> <li>• Data Protection Breach-Management Protocol</li> <li>• Data Protection Policy</li> <li>• ICT Strategy</li> <li>• FOI Policy</li> <li>• Staff Awareness – Online Training</li> <li>• Information Security Poster</li> <li>• Major Incident Process</li> <li>• Clear Desk Policy</li> <li>• Child Protection Policy</li> <li>• Adult Protection Procedures</li> <li>• Acceptable Use of Information Systems Policy 2.0</li> </ul>
RMP Element Description	Inverclyde Integration Joint Board (IJB) Compliance Statement	Evidence

**Element 9: Data protection**

The Keeper will expect an authority's RMP to indicate compliance with its data protection obligations. This might be a high level statement of public responsibility and fair processing.

If an authority holds and process information about stakeholders, clients, employees or suppliers, it is legally obliged to protect that information. Under the Data Protection Act, an authority must only collect information needed for a specific business purpose, it must keep it secure and ensure it remains relevant and up to date. The authority must also only hold as much information as is needed for business purposes and only for as long as it is needed. The person who is the subject of the information must be afforded access to it on request.

Read further explanation and guidance about element 9

<http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement9.asp>

The Information Commissioner has confirmed that the IJB can be a data controller albeit that it will not hold any personal records of service users/patients.

The IJB is a public body which is subject to the Freedom of Information (Scotland) Act 2002 and has its own Publication Scheme and FOI policy. Most requests will be addressed directly by the parent bodies.

The GDPR and Data Protection Act 2018 came into force in 2018 which increased the rights of individuals and increased fines for data breaches.

IJB Complaints- Jeanette Hawthorn is first point of contact

IJB records are properly managed for the purposes of Data Protection

ICO Registration Details

Inverclyde IJB is not registered as a Data Controller on the ICO website.

Board data controller/data processor policies and procedures- FOI, complaints, subject access requests

Inverclyde Council's Privacy Policy is available on

website <https://www.inverclyde.gov.uk/privacy>

NHS GG&C Data Protection Policy

<http://www.staffnet.ggc.scot.nhs.uk/Acute/Diagnostics/All%20Laboratory%20Medicine/Mortuary%20Services/SGPathology/Documents/17%20Feb%2024%20Confidentiality%20and%20Data%20Protection%20Policy%20V2%201.pdf>

**Element 9: Data protection (continued)**

Council's Compliance with Data Protection

GDPR Introduction Training to Extended Corporate Management Team: 8<sup>th</sup>, 15<sup>th</sup> and 22<sup>nd</sup> May 2018 – **Appendix 1**

GDPR Introduction Training to Elected Members: 25<sup>th</sup> and 30<sup>th</sup> April and 22<sup>nd</sup> August 2018 – **Appendix 2**

Data Protection Impact Assessment  
Training: 28<sup>th</sup> September 2018 –  
**Appendix 3**

Data Breach Training to HSCP Staff: 28<sup>th</sup>  
August 2018 – **Appendix 4**

**Access Limited to Internal Users**

GDPR Employee Guide available on the  
Intranet:

<http://icon/GetAsset.aspx?id=fAAxADAAOAA1ADYAfAB8AEYAYQBsaHMAZQB8AHwAMAB8AA2>

Data Protection Breach Management  
Protocol:

<http://icon/GetAsset.aspx?id=fAAxADAA MwA2ADQafAB8AEYAYQBsaHMAZQB8AHwAMAB8AA2>

Mandatory e-learning GDPR module  
available on Brightwave:

<https://tracking.brightwave.co.uk/LNT/Inverclyde/Login.aspx?ts=636783161364771846>

Screenshot of Information Governance  
Page – **Appendix 5.**

Screenshot of e-learning GDPR module  
– **Appendix 6.**



		Screenshot of Information Security and Governance e-learning modules – <b>Appendix 7.</b>
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RMP Element Description	Inverclyde Integration Joint Board (IJB) Compliance Statement	Evidence
<p><b>Element 10: Business continuity and vital records</b>  The Keeper will expect an authority's RMP to indicate arrangements in support of records vital to business continuity. Certain records held by authorities are vital to their function. These might include insurance details, current contract information, master personnel files, case files, etc. The RMP will support reasonable procedures for these records to be accessible in the event of an emergency affecting their premises or systems.</p> <p>Authorities should therefore have appropriate business continuity plans ensuring that the critical business activities referred to in their vital records will be able to continue in the event of a disaster. How each authority does this is for them to determine in light of their business needs, but the plan should point to it.</p> <p><a href="http://www.nas.gov.uk/recordKeeping/PRSA/guidance/Element10.asp">Read further explanation and guidance about element 10 - <u>http://www.nas.gov.uk/recordKeeping/PRSA/guidance/Element10.asp</u></a></p>	<p>A business continuity and vital records plan serves as the main resource for the preparation for, response to, and recovery from, an emergency that might affect any number of crucial functions in an authority.</p> <p>The IJB's records will be subject to the policies and procedures of the partner bodies in relation to business continuity.</p> <p>The MoU sets out that the IJB's records are managed in accordance with Inverclyde Council's Business Continuity and vital records arrangements.</p> <p>All services will continue to be provided or commissioned directly by NHS GG&amp;C or Inverclyde Council. As such there is no direct requirement for the IJB to have its own arrangements for business continuity of vital records.</p> <p>Both NHS GG&amp;C and Inverclyde Council have adequate business continuity arrangements to ensure the sustainability of health and social care services for which the IJB has overall responsibility.</p>	<p><b>NHS GG&amp;C</b></p> <p>Business Continuity Management Strategy 2015</p> <p><a href="http://www.nhsggc.org.uk/media/236564/strategy-bcp-april-2015-v1-3-final-pdf.pdf">www.nhsggc.org.uk/media/236564/strategy-bcp-april-2015-v1-3-final-pdf.pdf</a></p> <p>NHS GG&amp;C Major Incident Plan December 2015</p> <p><a href="http://www.nhsggc.org.uk/media/239298/nhsggc-major-incident-plan-2015-2-sanitized.pdf">http://www.nhsggc.org.uk/media/239298/nhsggc-major-incident-plan-2015-2-sanitized.pdf</a></p> <p><b>Inverclyde Council: IC Evidence</b></p> <p>ICT Major Incident Process</p>

RMP Element Description	Inverclyde Integration Joint Board (IJB) Compliance Statement	Evidence
<p><b>Element 11: Audit trail</b></p> <p>The Keeper will expect an authority's RMP to provide evidence that the authority maintains a complete and accurate representation of all changes that occur in relation to a particular record. For the purpose of this plan 'changes' can be taken to include movement of a record even if the information content is unaffected. Audit trail information must be kept for at least as long as the record to which it relates.</p> <p>This audit trail can be held separately from or as an integral part of the record. It may be generated automatically, or it may be created manually.</p> <p><a href="http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement11.asp">Read further explanation and guidance about element 11 - <u>http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement11.asp</u></a></p>	<p>An audit trail is a sequence of steps documenting the movement and/or editing of a record resulting from activities by individuals, systems or other entities.</p> <p>The IJB's records are created by NHS GG&amp;C and Inverclyde Council and are managed via Inverclyde Council.</p> <p>Personal records, policies and procedures and all other corporate records will be accessed by employees through the parent bodies information systems. As the IJB develops its own internal and external information systems consideration will be given to the need for audit trail arrangements.</p>	<p>The MoU sets out the IJB's Audit Trail arrangements</p>

RMP Element Description	Inverclyde Integration Joint Board (IJB) Compliance Statement	Evidence
<p><b>Element 12: Competency framework for records management staff</b></p> <p>The Keeper will expect an authority's RMP to detail a competency framework for person(s) designated as responsible for the day-to-day operation of activities described in the elements in the authority's RMP. It is important that authorities understand that records management is best implemented by a person or persons possessing the relevant skills.</p> <p>A competency framework outlining what the authority considers are the vital skills and experiences needed to carry out the task is an important part of any</p>	<p>A competency framework lists the core competencies and the key knowledge and skills required by a records manager. It can be used as a basis for developing job specifications, identifying training needs, and assessing performance.</p> <p>The IJB will rely upon the records manager of the partner body for compliance under this element.</p>	<p>The Board's plan must refer to the Competency framework arrangements and evidence under the agreed partner body plan.</p> <p><b>NHS GG&amp;C</b></p> <p>NHS – via Learnpro – e-learning training available</p> <p><b>Inverclyde Council:</b></p>

<p>records management system. If the authority appoints an existing non-records professional member of staff to undertake this task, the framework will provide the beginnings of a training programme for that person.</p> <p>The individual carrying out day-to-day records management for an authority might not work for that authority directly. It is possible that the records management function is undertaken by a separate legal entity set up to provide functions on behalf of the authority, for example an arm's length body or a contractor. Under these circumstances the authority must satisfy itself that the supplier supports and continues to provide a robust records management service to the authority.</p>	<p>Training for records management staff will remain the responsibility of the employing bodies NHS GG&amp;C and Inverclyde Council.</p>	<p><b>Information Classification Policy</b>  <b>Business Classification Scheme</b>  <b>Mandatory Information Governance training for all employees</b>  <b>Data Protection Officer</b></p>
<p><b>RMP Element Description</b></p>	<p><b>Inverclyde Integration Joint Board (IJB) Compliance Statement</b></p>	<p><b>Evidence</b></p>
<p><b>Element 13: Assessment and review</b>  Section 1(5) (i)(a) of the Act says that an authority must keep its RMP under review.</p> <p>An authority's RMP <u>must</u> describe the procedures in place to regularly review it in the future.</p> <p>It is important that an authority's RMP is regularly reviewed to ensure that it remains fit for purpose. It is therefore vital that a mechanism exists for this to happen automatically as part of an authority's internal records management processes.</p> <p>A statement to support the authority's commitment to keep its RMP under review must appear in the RMP detailing how it will accomplish this task.</p> <p>Read further explanation and guidance about element 13 <a href="http://www.nas.gov.uk/recordKeeping/PRSA/guida">http://www.nas.gov.uk/recordKeeping/PRSA/guida</a></p>	<p>The IJB relies on the partner authority to ensure that the systems, policies and procedures that govern its records are being regularly assessed.</p> <p>This record management plan will be reviewed and updated through the Information Governance Steering Group. During the first year any gaps in this plan will be identified as issues arise and solutions agreed.</p>	<p><b>NHS GG&amp;C:</b></p> <p>Remits of the identified groups</p> <p><a href="http://www.nhsggc.org.uk/media/236580/ceo-whole-system-directors-group-remit-jan-2016-2.docx">http://www.nhsggc.org.uk/media/236580/ceo-whole-system-directors-group-remit-jan-2016-2.docx</a></p> <p><a href="http://www.nhsggc.org.uk/media/236581/ig-steering-group-remit.doc">http://www.nhsggc.org.uk/media/236581/ig-steering-group-remit.doc</a></p> <p><a href="http://www.nhsggc.org.uk/media/2390">http://www.nhsggc.org.uk/media/2390</a></p>

<a href="#">nceElement13.asp</a>		<a href="#">85/element-13-rm-learn-pro-module-screen-shot.docx</a>  <b>IC EVIDENCE</b> Information Governance Steering Group Terms of Reference – <b>Appendix 8.</b>  Screenshot of Records Management Module – <b>Appendix 9.</b>
RMP Element Description	Inverclyde Integration Joint Board (IJB) Compliance Statement	Evidence
<p><b>Element 14: Shared Information</b></p> <p>The Keeper will expect an authority’s RMP to reflect its procedures for sharing information. Authorities who share, or are planning to share, information must provide evidence that they have considered the implications of information sharing on good records management.</p> <p>Information sharing protocols act as high level statements of principles on sharing and associated issues, and provide general guidance to staff on sharing information or disclosing it to another party. It may therefore be necessary for an authority’s RMP to include reference to information sharing protocols that govern how the authority will exchange information with others and make provision for appropriate governance procedures.</p> <p>Specifically the Keeper will expect assurances that an authority’s information sharing procedures are</p>	<p>Under certain conditions, information given in confidence may be shared. Most commonly this relates to personal information, but it can also happen with confidential corporate records.</p> <p>The IJB may well be sharing data or information with its partner bodies that must be managed in accordance with the guidance issued by the Information Commissioner under the Data Protection Act 2018 and the GDPR.</p> <p>The Act regards records created by a third party under contract to a public body to deliver a statutory function of that authority as public for the purposes of the Act. This means that authorities in such a relationship must be satisfied that public records being created on</p>	<p>Caldicott Report</p> <p><a href="http://www.imi.org.uk/file/download/3707/CaldicottGuardianManualScotland-June2012.pdf">http://www.imi.org.uk/file/download/3707/CaldicottGuardianManualScotland-June2012.pdf</a></p> <p>Information Sharing Protocol between NHSGGC and Local Authorities</p> <p><a href="http://www.nhsggc.org.uk/media/236748/124-nhsggc-protocol-for-sharing-information.pdf">http://www.nhsggc.org.uk/media/236748/124-nhsggc-protocol-for-sharing-information.pdf</a></p> <p>SCI (Scottish Care Information) Access Protocol</p> <p>Information Sharing Protocol training – e-learning module covering the</p>

<p>clear about the purpose of record sharing which will normally be based on professional obligations. The Keeper will also expect to see a statement regarding the security of transfer of information, or records, between authorities whatever the format.</p>	<p>its behalf are managed in line with its RMP. It must be satisfied that the third party provider has robust records management arrangements in place. However, it is unlikely that this is relevant to the IJB.</p>	<p>sharing of information</p> <p><a href="http://www.nhs.uk/mediaservices/236749/information-sharing-protocol.docx">www.nhs.uk/mediaservices/236749/information-sharing-protocol.docx</a></p> <p>Information Sharing template for use by the NHS, Local Authorities and the Integrated Joint Boards</p> <p>Scottish Prison Service</p> <p><a href="http://www.nhs.uk/mediaservices/236582/information-sharing-protocol-nhs-scotland-and-sps1.pdf">http://www.nhs.uk/mediaservices/236582/information-sharing-protocol-nhs-scotland-and-sps1.pdf</a></p> <p>Sharing Data with Third Parties</p> <p><a href="http://www.nhs.uk/mediaservices/238819/data-processing-agreement-it-dept-use.doc">http://www.nhs.uk/mediaservices/238819/data-processing-agreement-it-dept-use.doc</a></p>
<p><b>Element 14 (continued)</b></p>		<p><u>IC Evidence</u></p> <p>Greater Glasgow and Clyde Protocol ICT Acceptable Use Policy UK Government Data sharing Guide</p> <p><a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file</a></p>

[/307156/data-sharing-guide-april-14.pdf](#)

ICO Data Sharing Code of Practice <https://ico.org.uk/media/for-organisations/documents/2664/leadership-data-protection-checklist.pdf>

Social work Information Sharing Mandate

HSCP Information Sharing Protocol - An information sharing protocol has been agreed between NHS GGC and Inverclyde Council to enable the safe and effective sharing of information.





Overarching Memorandum of Understanding (MoU)

Between

Inverclyde Integration Joint Board

Inverclyde Council

And

Greater Glasgow & Clyde Health Board

In relation to the IJB's Records Management Plan

**DRAFT:**

**Ratification Date**

**Review Date**

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# 1. PARTIES, SCOPE AND PURPOSE

## 1.1 Name and details of the parties

Legal name of parties	Short name of the party	Head Office address	ICO Registration
Inverclyde Integration Joint Board	" <b>IJB</b> "	Hector McNeil House Cathcart Square, Greenock, PA15 4LY	
Inverclyde Council	" <b>Council</b> "	Municipal Buildings, Cathcart Square, Greenock, PA15 4 LY	
Greater Glasgow & Clyde Health Board	" <b>Board</b> "	JB Russell Gartnavel General Hospital Glasgow G12 OXN	

## 1.2 Introduction

The Public Bodies (Joint Working) (Scotland) Act 2014 was passed by the Scottish Parliament in February 2014 and came into force on 1<sup>st</sup> April 2016 and provides the framework for the integration of health and social care services in Scotland. Roles and responsibilities of IJBs, including the need for a Records Management Plan are set out here: <https://www.gov.scot/Publications/2015/09/8274/2>

Inverclyde IJB operates as a body corporate (a separate legal entity), acting independently of Greater Glasgow & Clyde Health Board and Inverclyde Council.

Each of the Parties listed above are obliged to submit and maintain a Records Management Plan as defined in and in accordance with the Public Records (Scotland) Act 2011.

The Act requires named public authorities to submit a Records Management Plan (RMP) to be agreed by the Keeper of the Records of Scotland. Greater Glasgow & Clyde Health Board and Inverclyde Council already have agreed Record Management Plans in place. IJBs were added to the Act's schedule by the Public Bodies (Joint Working) (Scotland) Act 2014 and this Memorandum of Understanding sets out how each of these RMPs relate to each other.

## 1.3 Context

The majority of records including employment, service user and internal policies and procedures will continue to be managed in the parent body organisations, i.e. Inverclyde Council (the Council) and Greater Glasgow & Clyde Health Board (the Board) and as such will be covered by their respective record management plans.

The records covered by the IJB's records management plan constitute IJB business in terms of:

- IJB Meetings and related committees- agendas and papers, including Directions, Audit and Risk Committee and Strategic Planning
- IJB Strategies and Policies, including the Annual Report, Strategic Plan and Delivery Plan

#### **1.4 Purpose**

This Memorandum of Understanding sets out the agreement between the IJB and the Council and the Board on how the process of depositing, storing and accessing the IJB's records of enduring value will operate.

#### **1.5 Records Management**

The Parties acknowledge and agree that the responsibility for creating and maintaining the IJB's records will be delegated to the Council.

The IJB will follow the corporate Business Classification Scheme (BCS) adopted by the Council and the Council's BCS has been updated to include IJB records. This has been discussed and agreed as a sensible approach by the Board and the Council.

As such, the IJB's Records Management Plan evidences compliance via referencing both the Council's and the Board's Records Management Plans.

#### **1.6 Parties' Responsibilities**

All of the IJB's records will be subject to the policies and procedures of the Council. The nominated officers within the Council and the Board will have operational responsibility and are able to access these policies and procedures, as well as undergo appropriate training, e.g. Data Protection, Information Security, etc.

IJB records are part of the Committee Management System and as such have permanent retention status, which comply with statutory obligations set out under the Public Records (Scotland) Act 2011 and all other relevant legislation. The IJB's records are managed in accordance with the Council's Business Continuity and vital records arrangements. The Council's Audit Trail arrangements will ensure that records are retrievable and offer certainty around version control. The IJB will rely on the Council to ensure that the systems, policies and procedures that govern its records are being regularly assessed. An annual review will be undertaken by a group nominated by the IJB to ensure this is being done effectively.

## 2. CORPORATE RESPONSIBILITY

### Corporate Responsibility

The IJB's Chief Officer has senior responsibility for all aspects of the IJB's Records Management and is also the IJB's "Senior Information Risk Owner ("SIRO). The Chief Officer is content that all IJB Records will be managed by Inverclyde Council in line with Council policies and this is facilitated by this Memorandum of Understanding. In addition, the IJB's Chief Officer is satisfied that the Council and the Board have appropriate records management arrangements in place and that each has already been approved by the Keeper.

## 3. SIGN-OFF AND RESPONSIBILITIES

### 3.1 Name of Accountable Officer, etc.

The Accountable Officers for the Parties are:

Accountable Officer Name	Post title	Organisation
Louise Long	Chief Officer	Inverclyde Integration Joint Board
Aubrey Fawcett	Chief Executive	Inverclyde Council
Jane Grant	Chief Executive	Greater Glasgow & Clyde Health Board

### 3.2 Leads for Records Management

The lead for Records Management at each of the Parties is:

Name	Post title	Organisation
Jeanette Hawthorn	Business Support Manager	Inverclyde Health & Social Care Partnership
TBC		Inverclyde Council
TBC		Greater Glasgow & Clyde Health Board

### 3.3 Signatories

The following individuals (being authorised signatories) will sign this Memorandum of Understanding on behalf of the Parties:

Name of Party	Inverclyde Integration Joint Board	
Authorised signatories	Title /Name	Louise Long
	Role	Chief Officer
Head Office address	Hector McNeil House, Cathcart Square, Greenock	

Name of Party	Inverclyde Council	
Authorised signatories	Title /Name	Aubrey Fawcett
	Role	Chief Executive
Head Office address	Inverclyde Council Municipal Buildings, Cathcart Square, Greenock	

Name of Party	Greater Glasgow & Clyde Health Board	
Authorised signatories	Title /Name	tbc
	Role	
Head Office address		

### 3.4 Sign off

"We the undersigned agree to the details recorded in this Overarching Memorandum of Understanding; are satisfied that our representatives have carried out the necessary work to ensure that the IJB complies with the Public Records (Scotland) Act 2011. The IJB will submit and maintain a Records Management Plan to the Keeper. We agree to review this document on an annual basis.

Signature.....		Signature.....	
For and on behalf of Inverclyde Integration Joint Board		For and on behalf of Inverclyde Council	
Name	Louise Long	Name	Aubrey Fawcett
Date		Date	

Signature.....	
For and on behalf of Greater Glasgow & Clyde Health Board	
Name	Jane Grant
Date	

**Review Date:**