Report To:	Policy and Resources Committee	Date:	2 February 2016
Report By:	Brian Moore Corporate Director (Chief Officer), Inverclyde Health and Social Care Partnership	Report No:	SW/09/2016/DR
Contact Officer:	Dean Robinson Information Governance Officer	Contact No:	01475 712136
Subject:	INFORMATION GOVERNANCE AND MANAGEMENT UPDATE		

1.0 PURPOSE

1.1 The purpose of this report is to update the Committee on the Records Management Plan and the Council's new governance arrangements.

2.0 SUMMARY

2.1 Since we last reported to the Committee, the Council has made significant progress in delivering the information governance and management framework and has developed a Records Management Plan (RMP) as required under the Public Records (Scotland) Act 2011. (the Act).

2.2 Inverclyde Council and Licensing Board successfully had its Records Management Plan approved by The Keeper of the Records Scotland (the Keeper) on 12 November 2015, subject to an 'improvement plan'.

2.3 In order to implement an improvement plan recommended by the Keeper and maintain elements of the RMP that were agreed, the Council will put in place a new governance structure.

2.4 The implementation of the Records Management Plan and the embedding of the improvement plan within the Council are expected to be undertaken in stages over the next 5 years until the Keeper determines a review date. The Council will be required to update the Keeper on the progress of the improvement plan when appropriate.

3.0 RECOMMENDATIONS

3.1 That the Committee note the approval of the Inverclyde Council and Licensing Board Records Management Plan, subject to an improvement plan recommended by the Keeper of the Records Scotland.

3.2 That the Committee note a new governance structure will be in place to implement the Records Management Plan and a progress report will be submitted to the Policy & Resources Committee annually.

Brian Moore
Corporate Director (Chief Officer), Inverclyde Director HSCP

4.0 BACKGROUND

4.1 The Public Records (Scotland) Act 2011 requires named authorities to submit a Records Management Plan (hereafter referred to as "the RMP") for the approval of the Keeper of the Records of Scotland (The Keeper). The Council submitted its RMP on 30th June 2015.

4.2 An assessment was considered whether the RMP of Inverclyde Council and Inverclyde Licensing Board 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 Public Records (Scotland) Act.

4.3 The RMP was assessed by the Public Records (Scotland) Act Assessment Team on behalf of the Keeper, and was agreed on 12th November 2015. The Keeper's findings and recommendations are included in his assessment report published on the National Records of Scotland website. These findings are summarised below.

4.4 Of the 14 elements, the following were agreed as compliant with the Act and considered to have supporting evidence of such compliance:

Agreed element	Keeper's Assessment
Senior Officer Responsibility	The Council and Licensing Board identified appropriate individuals with overall responsibility for records management.
Records Manager Responsibility	The Council and Licensing Board identified an appropriate individual with day-to-day responsibility for implementing the Records Management Plan.
Records Management Policy	The Council has a Records Management Policy which is published internally and externally.
Retention Schedule	The Council has a full retention schedule which is published internally and externally.
Information Security	The Council has arrangements in place to ensure that records are held securely as required by the Act.
Data Protection	Inverclyde Council and Inverclyde Licensing Board have properly considered their responsibilities under the Data Protection Act.
Business Continuity and Vital Records	Inverclyde Council has approved and operational business continuity arrangements in place and that these include the recovery of records.
Competency Framework for Records Management Staff	The Council has appropriate records management training in place for relevant staff.
Assessment and Review	Inverclyde Council have procedures in place to review their records management plan as required by the Act.

4.5 However the following elements 'amber' were agreed as part of an 'improvement plan' and will require considerable development. This means the Authority must commit to closing a gap in these provision areas. The Council has already made some progress towards closing the gap in

these areas but the Keeper has recommended some action. The Keeper will request an update for progress on the 'amber' improvement plan when appropriate:

'Amber' Improvement Area	Keeper's Recommendation
Business Classification	Implementation of a corporate business classification scheme (BCS) that will link in with the Retention Schedule.
Destruction Arrangements	A corporate process to be in place for the deletion of electronic documents from network drives.
Archiving and Transfer	The Council must make provisions to ensure its records of long term historical value are deposited with an appropriate repository and arrangements are in place to transfer and archive material of enduring value.
Audit Trail	The Council must have procedures in place in relation to audit trails covering all transactions undertaken.
Shared Information	Procedures for the efficient sharing of information both within an organisation and with external partners

4.6 The Council's Information Governance Steering Group (IGSG) produced the RMP and is responsible for its review and improvement plan. In order to implement the improvement plan and continued momentum on the approved elements, the IGSG have proposed a restructure to assist the Council in delivering the RMP.

The IGSG will concentrate on governance projects to enable the Council to focus on the 'amber' improvement plan areas that still require considerable development.

There will be a sub-working group to focus on the shared information element as well as continuing the progress the Council has already made with information sharing reviews.

4.7 Additionally, ongoing work streams in the Council will continue maintaining momentum on the elements that the Keeper agreed in the RMP. This includes:

- The implementation of records management policy and practice.
- Delivery of information governance training and education to ensure there is a competency for records management staff and communication and awareness raising across the Council.
- Enhanced information security measures including the classification of emails and documents.
- Dedicated training for managers who have Data Protection responsibilities.

4.8 The IGSG have committed to deliver the RMP improvement plan and will continue to meet on pre-determined dates throughout the year.

5.0 IMPLICATIONS

Finance

5.1 Implementation of the Records Management Plan does not present any immediate cost implications. This may change upon specific responses to implementation of the RMP and will be identified separately.

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

5.2 The recommendations made in this progress report will ensure the Council's processes are in line with legislative requirements, including the Public Records (Scotland) Act 2011, the Data Protection Act 1998, and the Freedom of Information (Scotland) Act 2012

Human Resources

5.3 The Records Management Plan will place responsibilities on staff in conjunction with the Employee Code of Conduct in compliance with information governance, data protection and IT security responsibilities.

Equalities

5.4 None at this time, although recognition will be given to the wider and associate equalities agenda.

	YES (see attached appendix)
√	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.

Repopulation

5.5 There are no direct repopulation implications arising from this report.

6.0 CONSULTATIONS

6.1 Consultation took place with the Information Governance Steering Group.

7.0 BACKGROUND PAPERS

7.1 Information Governance and Management Update Report to Policy and Resources Committee, 24 March 2015.