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**To: Renfrewshire Integration Joint Board**

**On: 25 January 2019**

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**Report by: Chief Officer**

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**Heading: IJB Records Management Plan**

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## **1. Summary**

- 1.1. The purpose of this report is to provide the IJB with a Records Management Plan (RMP) which it is required to submit to the Keeper of the Records of Scotland by 1 February 2019. The RMP sets out how the IJB records will be created and managed in line with national policy. This is a responsibility that all public bodies must fulfil.

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## **2. Recommendation**

It is recommended that the IJB:

- Approve the content of the Records Management Plan and give approval that this can now be formally submitted to the Keeper of the Records of Scotland for agreement by 1 February 2019 and will be reviewed as required.

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## **3. Background**

### **3.1. 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 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;
- 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.

### 3.2. Content of the Records Management Plan

NHS Greater Glasgow & Clyde and Renfrewshire 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 Renfrewshire IJB to submit its RMP by 1 February 2019.

The attached RMP sets out the arrangements for the management of the IJB's records and the relationship with NHS Greater Glasgow & Clyde and Renfrewshire 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 (Integration Joint Board, Audit Committee and Strategic Planning Group) and plans and policies such as the Annual Performance Report and the Strategic Plan. All of this information is already in the public domain via the IJB's pages on Renfrewshire HSCP's website:

<http://www.renfrewshire.hscp.scot/>

<http://www.renfrewshire.hscp.scot/article/5230/Integration-Joint-Board>

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

Renfrewshire IJB's records are organised internally via utilising BCS, as well as ensuring they are readily available externally via the IJB's pages on Renfrewshire Council's website.

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 and will be reviewed as required.

#### 4. Policy Implications

- 4.1 Information underpins the IJB's over-arching strategic objectives and helps it meet its strategic outcomes.
- 4.2 Its information supports it to:
- Demonstrate accountability
  - Provide evidence of actions and decisions
  - Assist with the smooth running of business
  - Help build organisational knowledge
- 4.3 Good recordkeeping practices lead to greater productivity as less time is taken to locate information. Well managed records will assist 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
- 4.4 In relation to 4.3 above, we had been requested by NHS Greater Glasgow & Clyde to create an Information Asset Register to ensure that Renfrewshire Health & Social Care Partnership meets the compliance of the requirements of the Public Records (Scotland) Act 2011. This register will provide a framework in which the HSCP can manage its health information assets and ensure that any data, information and knowledge is useable, accessible and reliable.

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#### Implications of the Report

1. **Financial** – Sound financial governance arrangements are being put in place to support the work of the Partnership.
2. **HR & Organisational Development** - There are no HR and OD implications arising from the submission of this paper
3. **Community Planning** - There are no Community Planning implications arising from the submission of this paper
4. **Legal** – The IJB must comply with the Public Records (Scotland) Act 2011 as any breach of this could incur penalties.
5. **Property/Assets** - There are no property/asset implications arising from the submission of this paper.
6. **Information Technology** - There are no ICT implications arising from the submission of this paper.
7. **Equality and Human Rights** - The main issue in relation to equalities is ensuring that the RMP is accessible.
8. **Procurement Implications** - There are no procurement implications arising from the submission of this paper.

- 9. Privacy Impact** - There are no privacy implications arising from the submission of this paper.
- 10. Risk** – Statutory Agencies are more accountable to the public than ever before through increased awareness of openness and transparency. Knowledge and information management is now formally recognised as a function of governance similar to finance, IT and communications. It is expected that the IJB is fully committed to creating, managing, disclosing, protecting and disposing of information effectively and legally. Breach of this could incur penalties.
- 11. Risk Implications** – As per the subject content of the risk section of this paper.

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**List of Background Papers – None.**

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# Renfrewshire 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 Renfrewshire 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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David Leese, Chief Officer, Renfrewshire Integration Joint Board

## Document Control Information

Revision	Date	Revision Description
1.0	25/01/2019	Draft version submitted to IJB for approval
	01/02/2019	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 Renfrewshire 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, 2014 which came into force on 1 January 2016. The IJB will therefore follow procedures that aim to ensure that all officers and 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 named 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 Renfrewshire 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 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 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 Renfrewshire Integration Joint Board**

Renfrewshire Integration Joint Board was established under the Public Bodies (Joint Working) Scotland Act 2014. The Renfrewshire Integration Scheme received Royal Assent on 27 June 2015 and the IJB was formally established on 18 September 2015.

From 1 April 2016 Renfrewshire IJB became responsible for the planning and oversight of delivery of health and social care functions delegated to it by NHS Greater Glasgow & Clyde and Renfrewshire Council.

These include adult social care services, mental health and learning disability, district nursing, children's health services, podiatry and health improvement, including some hospital services. The area covered by Renfrewshire IJB is coterminous with Renfrewshire Council.

The IJB operates as a body corporate (a separate legal entity), acting independently of NHS Greater Glasgow & Clyde and Renfrewshire Council. The IJB consists of eight voting members appointed in equal number by NHS Greater Glasgow & Clyde and Renfrewshire Council, with a number of representative 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, Chief Financial 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. The 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
- Better resource management
- 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 IJB 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 decision-making; document its aims and objectives, activities and ensure that legal, administrative and audit requirements are met.

The records management practices evidenced in this RMP and subsequent action plan are essentially a matter of good business administration. Information required for any purpose will only be as good as the quality of the records from which it is taken. If reliable records are not created in the first place, if they cannot be found when needed, or if the arrangements for their eventual archiving or destruction are inadequate, then information may not be adequate or even available for any purpose.

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.

## **Renfrewshire 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 by Renfrewshire Council and NHS Greater Glasgow & Clyde and, as such, will be covered by their respective Record Management Plans.

As such, this RMP relates to the IJB Committees (Integration Joint Board, Audit Committee and Strategic Planning Group) and plans such as the Annual Performance Report and the Strategic Plan. All of this information is already in the public domain via the IJB's pages on Renfrewshire Council and Renfrewshire Health & Social Care Partnership websites.

[Renfrewshire Health and Social Care Partnership - Integration Joint Board](#)

[Renfrewshire Health & Social Care – Integration Joint Board](#)

It has been agreed with Renfrewshire Council that all of the IJB's records will be managed by Renfrewshire Council.

The Renfrewshire IJB Records Management Plan (RMP) is effective from 1 February 2019. The plan will be appropriately reviewed and updated. Reports will be submitted annually to the newly established Information Governance Group, before formal ratification by the Integration Joint Board.



RMP Element Description	Renfrewshire Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p><b>Element 1: Senior management responsibility:</b></p> <p>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>The Chief Officer, David Leese, 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>Letter of adoption of RMP and objectives of Chief Officer (<i>see Appendix 1</i>)</p> <p>Roles and responsibilities of the SIRO</p>	<p>IJB Records Management Procedure, which identifies roles and responsibilities, will be produced once the RMP has been approved.</p>

RMP Element Description	Renfrewshire Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p><b>Element 2: Records manager responsibility:</b></p> <p>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 must 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 implementation 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>The Operational Officer responsible for records management is:</p> <p>Renfrewshire Council – Mr Andrew Connor, Records Manager</p> <p>Mr Connor is able to access and manage IJB records 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>• Ensure any relevant records management training is brought to the attention of health and social care staff</li> </ul>	<p>Renfrewshire Council will have lead operational responsibility, with the Head of Administration having day-to-day responsibility for the implementation of the RMP.</p> <p>The Job description for Renfrewshire Council role is included as evidence to demonstrate that the named individual has the skills required and can access all IJB records (<i>see Appendix 2</i>).</p>	<p>What further development, if any, remains to be undertaken to bring this element into full compliance?</p>



RMP Element Description	Renfrewshire Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<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 gives 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 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.</p>	<p>Renfrewshire Council and NHS Greater Glasgow &amp; Clyde work in partnership with the Integration Joint Board (IJB).</p> <p>Renfrewshire IJB is responsible for planning health and care services for the Renfrewshire population.</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 partner organisations, i.e. Renfrewshire Council and NHS Greater Glasgow &amp; Clyde 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</li> <li>• IJB Strategies including the Annual Performance Report and the Strategic Plan</li> </ul> <p>All of this information is already in the public domain via the IJB's pages on Renfrewshire Health &amp; Social Care website:  <a href="#">Renfrewshire Health and Social Care Partnership - Integration Joint Board</a></p>	<p><b>NHS Greater Glasgow &amp; Clyde:</b></p> <p><a href="#">NHSGGC : NHSGGC Records Management Plan</a></p> <p><b>Renfrewshire Council:</b></p> <p><a href="#">Records Management - Renfrewshire Website</a></p>	<p>What further development, if any, remains to be undertaken to bring this element into full compliance?</p>

RMP Element Description	Renfrewshire Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p><b>Element 4: Business classification</b></p> <p>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.</p> <p>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 be regularly reviewed and updated.</p> <p>A business classification scheme allows an authority to map its functions and provides a structure for operating a disposal schedule effectively.</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>As the IJB has only been in operation since 1 April 2016, the type and volume of recordkeeping specific to the IJB is evolving.</p> <p>The IJB will follow the corporate Business Classification Scheme (BCS) adopted by Renfrewshire 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. Renfrewshire Council's BCS has been updated and will include IJB records.</p> <p>The BCS is a localised version of the model BCS published by the Scottish Council on Archives for use by all Scottish Local Authorities.</p> <p>IJB records are part of the Committee Management System and as such have permanent retention status.</p>	<p>The link to Renfrewshire Council's BCS Policy Document is on page 7 of its Record Management Plan.:  <a href="http://www.renfrewshire.gov.uk/media/2762/Records-Management-Plan/pdf/0Renfrewshire_Council_and_Renfrewshire_Licensing_Board_Records_Management_Plan_v1.0_2016_0323.pdf">http://www.renfrewshire.gov.uk/media/2762/Records-Management-Plan/pdf/0Renfrewshire_Council_and_Renfrewshire_Licensing_Board_Records_Management_Plan_v1.0_2016_0323.pdf</a></p>	

RMP Element Description	Renfrewshire Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p><b>Element 5: Retention schedules</b></p> <p>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 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.</p> <p>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.</p> <p>An authority's RMP <u>must</u> demonstrate the principle that retention rules are consistently applied across all of an authority's record systems.</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 partner body 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 IJB in making business-based disposal decisions against its records. These must take into consideration the IJB's statutory obligations.</p> <p>The corporate records including formal IJB reports and minutes will be managed in accordance with the Council Servicing Committee Protocol.</p> <p>As the records will be created and managed by NHS Greater Glasgow &amp; Clyde and Renfrewshire Council, the IJB will follow what is agreed and in place within each Partner Body</p> <p>The Business Classification Scheme used by Renfrewshire Council determines how long documents should be retained. IJB records are part of the Committee Management System and as such have permanent retention status (see Element 4).</p>	<p><b>NHS Greater Glasgow &amp; Clyde</b></p> <p>NHS Greater Glasgow &amp; Clyde's Record Management Plan includes Retention and Destruction of Records Policy. See page 11</p> <p><a href="http://www.nhsggc.org.uk/media/243288/nhsggc-rmp-v21-july-2017.pdf">http://www.nhsggc.org.uk/media/243288/nhsggc-rmp-v21-july-2017.pdf</a></p> <p><b>Renfrewshire Council:</b></p> <p>See page 8:</p> <p><a href="http://www.renfrewshire.gov.uk/media/2762/Records-Management-Plan/pdf/0Renfrewshire_Council_and_Renfrewshire_Licensing_Board_Records_Management_Plan_v1.0_20160323.pdf">http://www.renfrewshire.gov.uk/media/2762/Records-Management-Plan/pdf/0Renfrewshire_Council_and_Renfrewshire_Licensing_Board_Records_Management_Plan_v1.0_20160323.pdf</a></p> <p><b>Renfrewshire Council's Corporate Retention Schedule:</b></p> <p><a href="http://www.renfrewshire.gov.uk/media/4584/Records-Retention-Schedule/pdf/RenfrewshireCouncilRetentionSchedule.pdf">http://www.renfrewshire.gov.uk/media/4584/Records-Retention-Schedule/pdf/RenfrewshireCouncilRetentionSchedule.pdf</a></p>	<p>What further development, if any, remains to be undertaken to bring this element into full compliance?</p>

RMP Element Description	Renfrewshire Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p><b>Element 6: Destruction arrangements</b></p> <p>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.</p> <p>An authority's RMP <u>must</u> demonstrate that proper destruction arrangements are in place.</p> <p>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.</p>	<p>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.</p> <p>As such, the destruction of IJB records, in all formats, will be undertaken by Renfrewshire Council.</p> <p>All IJB records will be held electronically on Renfrewshire Council's system so no hard copies will require destruction.</p> <p>Electronic destruction policies will be determined at a later date. At this stage there is only a limited volume of records specific to the IJB.</p>	<p><b>NHS Greater Glasgow &amp; Clyde</b></p> <p>NHS Greater Glasgow &amp; Clyde's Record Management Plan includes Retention and Destruction of Records Policy</p> <p><a href="http://www.nhsggc.org.uk/media/243288/nhsggc-rmp-v21-july-2017.pdf">http://www.nhsggc.org.uk/media/243288/nhsggc-rmp-v21-july-2017.pdf</a></p> <p><b>Renfrewshire Council:</b></p> <p><a href="http://www.renfrewshire.gov.uk/media/2762/Records-Management-Plan/pdf/0Renfrewshire_Council_and_Renfrewshire_Licensing_Board_Records_Management_Plan_v1.0_20160323.pdf">http://www.renfrewshire.gov.uk/media/2762/Records-Management-Plan/pdf/0Renfrewshire_Council_and_Renfrewshire_Licensing_Board_Records_Management_Plan_v1.0_20160323.pdf</a></p> <p><b>Renfrewshire Council's Corporate Retention Schedule:</b></p> <p><a href="http://www.renfrewshire.gov.uk/media/4584/Records-Retention-Schedule/pdf/RenfrewshireCouncilRetentionSchedule.pdf">http://www.renfrewshire.gov.uk/media/4584/Records-Retention-Schedule/pdf/RenfrewshireCouncilRetentionSchedule.pdf</a></p>	<p>What further development, if any, remains to be undertaken to bring this element into full compliance</p>

RMP Element Description	Renfrewshire Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<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 from the operational side of the authority to either an in-house archive, if that facility exists, or another suitable repository, which <u>must</u> be named. The person responsible for the archive should also be cited.</p> <p>Some records continue to have value beyond their active business use and may be selected for permanent preservation. The authority's RMP <u>must</u> 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.</p>	<p>All IJB Records will be held electronically on Renfrewshire Council's system so no hard copies will be archived.</p> <p>Electronic archiving policies will be determined at a later date. At this stage there is only a limited volume of records specific to the IJB.</p> <p>In terms of a procedure, the IJB will follow Renfrewshire Council's RMP, Progress Update Review Final Report dated 10 October 2018.</p> <p>Digital preservation is not in place and as such, Renfrewshire Council has committed to pursue an Archives Service.</p>	<p>The agreed arrangement between the IJB and Renfrewshire Council for IJB records to be included in the archiving and transferring arrangements established by Renfrewshire Council.</p>	<p>Improvement Plan over the next five years to address this gap.</p>

RMP Element Description	Renfrewshire Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p><b>Element 8: Information Security</b></p> <p>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 property levels 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 must 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 Greater Glasgow &amp; Clyde and Renfrewshire Council arrangements in terms of systems, devices, information sharing platforms etc.</p> <p>All staff will remain employees of either NHS Greater Glasgow &amp; Clyde or Renfrewshire Council. As such they will be subject to the policies and procedures of their employer, i.e. NHS Greater Glasgow &amp; Clyde Information Security Policy or Renfrewshire Council Information Security policies.</p>	<p><b>NHS Greater Glasgow &amp; Clyde Information Security Policy</b></p> <p><b>Renfrewshire Council Information Promise</b></p> <p><a href="http://www.renfrewshire.gov.uk/article/2063/Information-Promise">http://www.renfrewshire.gov.uk/article/2063/Information-Promise</a></p>	

RMP Element Description	Renfrewshire Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p><b>Element 9: Data protection</b></p> <p>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.</p> <p>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 2018, 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 <u>must</u> 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 <u>must</u> be afforded access to it on request.</p>	<p>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.</p> <p>The IJB is registered as a public authority which will be subject to Freedom of Information legislation. Most requests will be addressed directly by partner bodies. Any requests specifically for the IJB will be managed in line with NHS GGC FoI guidance.</p> <p>Legislation changed on 25 May 2018 which will increase rights of individuals and increase fines for data breaches.</p> <p>IJB Complaints - first point of contact is Jean Still, Head of Administration.</p> <p>IJB records are properly managed for the</p>	<p>ICO Registration details</p> <p>Renfrewshire IJB is not registered as a Data Controller on the ICO website.</p> <p>IJB data controller/data processor policies and procedures- FOI, complaints, subject access requests</p> <p>Renfrewshire Council's Privacy Policy is made available to all staff via the Council's Intranet.</p> <p>NHS Greater Glasgow &amp; Clyde:</p> <p><a href="http://www.nhsggc.org.uk/patients-and-visitors/faqs/data-protection-privacy/">http://www.nhsggc.org.uk/patients-and-visitors/faqs/data-protection-privacy/</a></p> <p>Staff training - Data protection/information governance</p>	<p>What further development, if any, remains to be undertaken to bring this element into full compliance</p>

RMP Element Description	Renfrewshire Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p><b>Element 10: Business continuity and vital records</b></p> <p>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 business continuity 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 body in relation to business continuity.</p> <p>The IJB's records are managed in accordance with Renfrewshire Council's Business Continuity and vital records arrangements.</p> <p>All services will continue to be provided or commissioned directly by NHS Greater Glasgow &amp; Clyde or Renfrewshire 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 Greater Glasgow &amp; Clyde and Renfrewshire 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 Greater Glasgow &amp; Clyde</b></p> <p><a href="http://www.nhsggc.org.uk/media/243288/nhsggc-rmp-v21-july-2017.pdf">http://www.nhsggc.org.uk/media/243288/nhsggc-rmp-v21-july-2017.pdf</a></p> <p><b>Renfrewshire Council:</b></p> <p><a href="http://www.renfrewshire.gov.uk/media/2762/Records-Management-Plan/pdf/0Renfrewshire_Council_and_Renfrewshire_Licensing_Board_Records_Management_Plan_v1.0_20160323.pdf">http://www.renfrewshire.gov.uk/media/2762/Records-Management-Plan/pdf/0Renfrewshire_Council_and_Renfrewshire_Licensing_Board_Records_Management_Plan_v1.0_20160323.pdf</a></p>	<p>What further development, if any, remains to be undertaken to bring this element into full compliance</p>



RMP Element Description	Renfrewshire Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<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>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 Greater Glasgow &amp; Clyde and Renfrewshire Council and are managed via Renfrewshire Council.</p> <p>SEEMIS system in the Council gives full version control and ensures that the IJB's records are available at all times and that when accessed for business purposes, that these are the most up to date and current versions.</p> <p>Personal records, policies and procedures and all other corporate records will be accessed by employees through the information systems of NHS Greater Glasgow &amp; Clyde and Renfrewshire Council..</p>	<p>The audit trail arrangements are as follows:</p> <p><b>NHS Greater Glasgow &amp; Clyde</b></p> <p><a href="http://www.nhsggc.org.uk/media/243288/nhsggc-rmp-v21-july-2017.pdf">http://www.nhsggc.org.uk/media/243288/nhsggc-rmp-v21-july-2017.pdf</a></p> <p><b>Renfrewshire Council:</b></p> <p><a href="http://www.renfrewshire.gov.uk/media/2762/Records-Management-Plan/pdf/0Renfrewshire_Council_and_Renfrewshire_Licensing_Board_Records_Management_Plan_v1.0_20160323.pdf">http://www.renfrewshire.gov.uk/media/2762/Records-Management-Plan/pdf/0Renfrewshire_Council_and_Renfrewshire_Licensing_Board_Records_Management_Plan_v1.0_20160323.pdf</a></p>	<p>What further development, if any, remains to be undertaken to bring this element into full compliance</p>

RMP Element Description	Renfrewshire Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<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 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>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 Renfrewshire Council for compliance under this element.</p> <p>Training for records management staff will remain the responsibility of the employing bodies, NHS Greater Glasgow &amp; Clyde and Renfrewshire Council.</p> <p>Staff who are managing IJB records are employed by Renfrewshire Council.</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 Greater Glasgow &amp; Clyde</b> NHS-wide training available:</p> <p><a href="http://www.nhsggc.org.uk/media/243288/nhsggc-rmp-v21-july-2017.pdf">http://www.nhsggc.org.uk/media/243288/nhsggc-rmp-v21-july-2017.pdf</a></p> <p><b>Renfrewshire Council:</b> Council-wide training available:</p> <p><a href="http://www.renfrewshire.gov.uk/media/2762/Records-Management-Plan/pdf/0Renfrewshire_Council_and_Renfrewshire_Licensing_Board_Records_Management_Plan_v1.0_20160323.pdf">http://www.renfrewshire.gov.uk/media/2762/Records-Management-Plan/pdf/0Renfrewshire_Council_and_Renfrewshire_Licensing_Board_Records_Management_Plan_v1.0_20160323.pdf</a></p>	

RMP Element Description	Renfrewshire Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p><b>Element 13: Assessment and review</b></p> <p>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 process.</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>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 by the Records Manager and the Head of Administration. During the first year any gaps in this plan will be identified as issues arise and solutions agreed.</p>	<p><b>NHS Greater Glasgow &amp; Clyde</b></p> <p><a href="http://www.nhsggc.org.uk/media/243288/nhsggc-rmp-v21-july-2017.pdf">http://www.nhsggc.org.uk/media/243288/nhsggc-rmp-v21-july-2017.pdf</a></p> <p><b>Renfrewshire Council:</b></p> <p><a href="http://www.renfrewshire.gov.uk/media/2762/Records-Management-Plan/pdf/0Renfrewshire_Council_and_Renfrewshire_Licensing_Board_Records_Management_Plan_v1.0_20160323.pdf">http://www.renfrewshire.gov.uk/media/2762/Records-Management-Plan/pdf/0Renfrewshire_Council_and_Renfrewshire_Licensing_Board_Records_Management_Plan_v1.0_20160323.pdf</a></p>	

RMP Element Description	Renfrewshire Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<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 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>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.</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 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>An information sharing protocol has been agreed between NHS Greater Glasgow &amp; Clyde, Renfrewshire Council, the National Information Services Division and Renfrewshire IJB to enable the safe and effective sharing of information.</p>	<p>What further development, if any, remains to be undertaken to bring this element into full compliance</p>

Date: November 2018  
Our Ref:  
Your Ref:  
Enquiries: David Leese  
Tel: 0141 618 7629

To Whom It May Concern

### **Renfrewshire Integration Joint Board Records Management Plan**

I, David Leese, Chief Officer of Renfrewshire Integration Joint Board agree to oversee the adoption of the Integration Joint Board (IJB) Records Management Plan.

As the IJB's Senior Information Risk Owner I accept responsibility for all aspects of the IJB's records management programme and will be the corporate owner of this document, as per the attached Records Management Plan.

I have identified that Renfrewshire Health & Social Care Management Team will have the continuing responsibility for the practical implementation of the Records Management Plan.

**David Leese**  
**Chief Officer**  
**Renfrewshire Health and Social Care Partnership**

**David Leese**

**Renfrewshire HSCP Chief Officer**

**EXTRACT from Objectives 2018/19**

**Better Workplace**

Ensure, as the IJB Senior Information Risk Owner (SIRO), that all aspects of the Integration Joint Board's Records Management Plan is supported by the Senior Management Team.

**Better Health and Care**

**Better Value**

**RENFREWSHIRE COUNCIL**  
**FINANCE AND RESOURCES**  
**JOB OUTLINE**

<b>SERVICE:</b>	Finance & Resources	<b>SECTION:</b>	Legal & Democratic Services
<b>POST TITLE:</b>	Records Manager	<b>POST ID:</b>	
<b>GRADE:</b>		<b>LOCATION:</b>	Renfrewshire House, Cotton Street, Paisley
<b>REPORTING TO:</b>	Managing Solicitor, Information Governance, Legal & Democratic Services		

**PRINCIPAL ROLE:**

To oversee Renfrewshire Council's compliance with regulatory and statutory provisions insofar as they apply to records management.

To lead on the implementation of the Council's Records Management Plan.

To oversee the co-ordination of Council responses to information requests and ensure compliance with freedom of information, data protection and associated legislation, as appropriate.

**Key tasks for which the post holder will be responsible:**

1. To maintain, review and implement the Council's Records Management Plan and guidance, policies and procedures in relation to records management and assist Council Services with the ongoing implementation and monitoring of those.
2. To advise Council Services and provide guidance on all aspects of records management, including the introduction of effective and appropriate management of electronic records.
3. To promote good records management and raise awareness of records management issues.
4. To develop and deliver training in records management.
5. To advise Services on retention and disposal periods and have oversight of Services' retention and disposal schedules.
6. To manage the Council's corporate records store.
7. To advise on electronic document and record management projects and initiatives, ensuring that records are managed to agreed standards and that current records management policies and procedures are adhered to.

8. To discharge a co-ordinating role in relation to subject access, freedom of information and environmental information requests.
9. To chair the Council's Freedom of Information, Data Protection and Records Management Working Groups.
10. To contribute to and provide subject matter expertise to corporate working groups.
11. To liaise with the Council's ICT Services, who have responsibility for information management issues, as appropriate.
12. To liaise with Renfrewshire Leisure Limited regarding the selection and cataloguing of records worthy of permanent preservation to international standards.
13. To liaise with external stakeholders, such as the Keeper of the Records of Scotland, the Information Commissioner, the Scottish Information Commissioner and the Scottish Government, as appropriate.
14. Develop and promote equal opportunities both in terms of service delivery and employment practices in all aspects of Council activities.
15. Represent the Council at the Archivists of Scottish Local Authorities' Working Group.
16. Adhere to the Council's commitment to health and safety, supporting attendance, equal opportunities and compliance with all relevant policies.
17. Whilst this description is indicative of the nature and level of responsibilities associated with this job, it should not be considered as exhaustive. The post holder will be required to undertake other duties and responsibilities commensurate with the grade.