# Glasgow City Integration Joint Board Records Management Plan

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The IJB's Records Management Plan (RMP) contains documents that were provided to the Keeper of the Records of Scotland as evidence to support the RMP submission. These embedded documents are not accessible in the attached document. If you would like to make a request for access to any of these embedded documents please email your request to Glasgow City HSCP via the Contact Us page.

## **Records Management Plan**

## **Summary**

Glasgow City Integration Joint Board is fully committed to compliance with the requirements of the Public Records (Scotland) Act, which came into force on the 1st January 2013. Glasgow City Integration Joint Board will therefore follow procedures that aim to ensure that all officers supporting its operation, being employees of constituent authorities, 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 Glasgow City Integration Joint Board.

The Records Management Plan must set out and evidence proper arrangements for the management of the authority's public records, The Glasgow City IJB RMP sets out proper arrangements for the management of the organisation's records. The plan 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 by the Glasgow City IJB annually.

https://www.nrscotland.gov.uk/record-keeping/public-records-scotland-act-2011

https://www.legislation.gov.uk/asp/2011/12/contents

## **Key Elements of the Records Management Plan**

The Keeper of Records of Scotland has provided a Model Records Management Plan and supporting guidance material. The Glasgow City IJB RMP is wholly based on the model plan published in support of the Act by the Keeper of Records of Scotland.

There are 14 elements of the plan that have to be met and this plan adopts the model framework.

## **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.

## The Public Bodies (Joint Working) (Scotland) Act puts 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 Health & Social Care 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 Glasgow City Integration Joint Board**

Glasgow City Integration Joint Board (the IJB) was established under the Public Bodies (Joint Working) Scotland Act 2014. The Glasgow City Integration Scheme was approved by the Scottish Parliament in early 2016 and the IJB was formally established on 6<sup>th</sup> February 2016.

From 1<sup>st</sup> April 2016 Glasgow City IJB became responsible for the planning and oversight of delivery of health and social care functions delegated to it by NHS Greater Glasgow and Clyde and Glasgow City Council. The functions delegated to Glasgow City IJB are detailed in the Integration Scheme. The area covered by Glasgow City IJB is coterminous with the area covered by Glasgow City Council.

The IJB operates as a body corporate (a separate legal entity) acting independently of NHS Greater Glasgow and Clyde and Glasgow City Council. The IJB consists of sixteen voting members, eight each appointed by NHS Greater Glasgow and Clyde and Glasgow City 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 Officer: Finance and Resources, Medical Director, Nurse Director and Chief Social Work Officer.

The key functions of the IJB 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. This information supports it to:

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

Good record keeping 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.

In addition we are more accountable to the public now than ever before through increased 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.

No third party carries out an IJB function on its behalf.

#### Review

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

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

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

### Why is records management important?

Records are vital for the effective functioning of Glasgow City 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 and their ultimate disposal or archiving.

## **Records management principles**

<u>Security</u> – Records are available to relevant staff who require access to them and kept secure from unauthorised or inadvertent disclosure, alteration or erasure. Access and disclosure will be properly controlled. Audits trails will track access to, amendment and deletion of electronic versions of documents not in the public domain. Protective marking will be applied to manual versions. Records will be held in a robust format which remains readable for as long as records are required.

<u>Accountability</u> – 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

<u>Quality</u> – Records are complete and accurate, and the information they contain is reliable and its authenticity can be guaranteed.

<u>Accessibility</u> – 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.

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

<u>Training</u> – All staff are informed of their record-keeping responsibilities through appropriate training and guidance and if required further support as necessary.

#### **Glasgow City IJB Records Management Plan**

The Glasgow City IJB Records Management Plan (RMP) is effective from 1<sup>st</sup> January 2019. The plan will be continuously reviewed and updated.

RMP Element Description	Glasgow City Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
Element 1: Senior management responsibility: 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 must name and provide the job title of the senior manager who accepts overall responsibility for the RMP that has been submitted.	The Chief Officer has senior responsibility for all aspects of the IJB's Records Management, and is the corporate owner of this document.  The Chief Officer is also the Board's Senior Information Risk Owner (SIRO).	IJB Decision 31st October 2016 to designate CO as SIRO  https://glasgowcity.hscp.scot/sites/default/files/publications/Glasgow City IJB Minutes 31-10-16 APPROVED.pdf	No further development required. Measure fully implemented and evidenced.
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.	The Chief Officer chairs the Senior Management Team, which has strategic responsibility for the Health and Social Care Partnership.  The Chief Officer (Interim) of Glasgow City Health and Social Care Partnership is Susanne Millar.		
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).			
Read further explanation and guidance about element 1 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement1.asp			

## **RMP Element Description**

# Glasgow City Integration Joint Board (IJB) Compliance Statement

## **Evidence**

## Further Development

#### **Element 2: Records manager responsibility:**

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.

Read further explanation and guidance about element 2 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement2.asp

The Operational Officer responsible for records management is the HSCP's Head of Business Development.

#### Responsibilities include:

- Managing the IJB's records
- Reviewing and implementing operational policies and procedures in line with the RMP
- Ensuring relevant health and social care staff have records management training.

The Head of Business Development is Allison Eccles.

IJB Decision 31<sup>st</sup> October 2016 https://glasgowcity.hscp.scot/sites/defaul t/files/publications/Glasgow City IJB Mi nutes 31-10-16 APPROVED.pdf

MOU with GCC and IJB



MOU GCC IJB RMP - signed 20190226.pdf

Person specification for Head of Business Development (previously titled Head of Service Modernisation):



20210301 IJB RMP Element 2 - Person Sp The IJB has drawn up an agreement with the partner authority confirming that all the IJB's records will be subject to the policies and procedures of the partner body. As part of this agreement IJB officers will have specified access to these policies and procedures and will be inducted and trained in relation to these where appropriate, for example Data Protection, Information Security. etc. We believe that this agreement negates the need for the IJB to submit evidence in every instance and under each element. This was approved and signed on 26 February 2019.

RMP Element Description	Glasgow City Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
Element 3: Records management policy statement:  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.  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.  Read further explanation and guidance about element 3 – http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement3.asp	The context of this plan is that IJB records will be managed by Glasgow City Council and as such will be covered by their respective Record Management Policy.	Policy statements and other supporting documentation are included in the GCC Records Management Plans:  Glasgow City Council: http://www.glasgow.gov.uk/councillorsandcommittees/submissiondocuments.asp?submissionid=67023  Regardless of whether staff working with IJB records are employed by GCC or NHS GGC, they can access the GCC records management policy via the Council intranet (screenshot below):  20200214 IJB RMP Element 3 - Screenshc	As above for Element 2

RMP Element Description	Glasgow City Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
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 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.	As the IJB has only been in operation since 1st April 2016, the type and volume of record keeping specific to the IJB is evolving rapidly.  The IJB has developed an IJB Business Classification Scheme (BCS) modelled on the BCS adopted by Glasgow City Council which identifies its high-level functions and activities.	IJB Business Classification Scheme  IJB BCS v2.doc	The IJB will have its own BCS separate from the Council's which will be reviewed as the IJB develops.

## **RMP Element Description**

## Glasgow City Integration Joint Board (IJB) Compliance Statement

## Evidence Further Development

#### **Element 5: Retention schedules**

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.

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).

The principal reasons for creating retention schedules are:

- to ensure records are kept for as long as they are needed and then disposed of appropriately
- to ensure all legitimate considerations and future uses are considered in reaching the final decision.
- to provide clarity as to which records are still held by an authority and which have been deliberately destroyed.

"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.

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 <u>must</u> 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 Currently records generated and maintained within the HSCP in support of the IJB are retained on the basis of the GCC RRDS. The agreement that we will incorporate specific IJB retention information into the GCC RRDS is covered by the memo of understanding with GCC (see element 2). The IJB will comply with the Records Retention policies, plans and procedures of GCC. The IJB will retain responsibility for disposal periods and decisions for its information assets, and this will be made clear in the RRDS. Decision making and approvals around the IJB retention schedule will be via established reporting mechanisms.

Glasgow City Council Records Retention Disposal Schedule on: <a href="https://www.glasgow.gov.uk/rrds">www.glasgow.gov.uk/rrds</a>

IJB Information Asset Register



recognises that records are frequently held in IT applications (often legacy systems from prereorganisation) which do not have records management functionality. The council is committed to an ongoing review of these IT applications as they progress through their lifecycle with a view to incorporating records management requirements into upgrades and specifications for replacement.

The council also

RMP Element Description	Glasgow City Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
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.  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	Any destruction of IJB records, in all formats, will be undertaken in accordance with Glasgow City Council's destruction arrangements.  All IJB records will be held electronically on Glasgow City Council's EDRMS system with some documents published on GHSCP website for public information.  https://glasgowcity.hscp.scot/ 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.	Glasgow City Council Records Management Plan http://www.glasgow.gov.uk/councill orsandcommittees/viewDoc.asp?c =P62AFQNTZLUTNT81	As above for Element 2

RMP Element Description	Glasgow City Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
Element 7: Archiving and transfer arrangements 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.	We currently generate, maintain and store IJB records using GCC systems and processes. This includes, as above, proposal to incorporate IJB retention and disposal information into the GCC RRDS.	Glasgow City Council Records Management Plan <a href="http://www.glasgow.gov.uk/councillors">http://www.glasgow.gov.uk/councillors</a> <a href="mailto:andcommittees/viewDoc.asp?c=P62AFQNTZLUTNT81">andcommittees/viewDoc.asp?c=P62AFQNTZLUTNT81</a>	As above for Element 2
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.	Currently there are no records held in respect of the IJB which have reached a retention period requiring a disposal decision. It is envisaged that the agreement being sought from GCC in terms of a memo of understanding would include compliance with archiving and transferring arrangements as detailed in their RMP.		
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.			
Read further explanation and guidance about element 7- http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement 7.asp			

RMP Element Description	Glasgow City Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
Element 8: Information Security 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.	The IJB will follow and comply with Glasgow City Council policy and procedures in terms of arrangements for the security for systems, devices, information sharing platforms etc.	Glasgow City Council RMP:  http://www.glasgow.gov.uk/councillors andcommittees/submissiondocuments.	As above for Element 2
An authority's RMP must make provision for the proper level of security for its public records.  All public authorities produce records that are sensitive. An authority's RMP must 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.  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.	All staff that work with IJB records will remain employees of either NHS Greater Glasgow and Clyde or Glasgow City Council. As such they will be subject to the policies and procedures of their employer, i.e. NHS Greater Glasgow and Clyde Information Security Policy or Glasgow City Information Security policies.	Staff who work with IJB records can access their employer's information security policies and procedures via either Connect (the GCC intranet) or Staffnet (the NHS GGC intranet). Screenshots of these are provided below:  20200214 IJB RMP Element 8 - screenshc	

RMP Element Description	Glasgow City Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
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	To a limited extent, the IJB will hold some personal data on service users, staff, its own members and others. The IJB will comply with its responsibilities as a Data Controller and as a public authority in terms of the Data Protection Act 2018, has appointed a data protection officer (the IJB has appointed the GCC data protection officer – Dr K Meechan – as its data protection officer)	GCIJB Privacy version1 140120.doc  Council & NHS Data Sharing agreement.  2019-12-23 NHSGGC LAS ISP GD	An IJB Privacy Notice has been developed and approved by GCIJB's Data Protection Officer and is awaiting only formal approval by GCIJB before it is published. A revised Council & NHS Data Sharing Agreement has been developed and has been approved and signed by GCC and NHS GG&C.

## RMP Element Description

## Element 10: Business continuity and vital records

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.

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.

Read further explanation and guidance about element 10 - <a href="http://www.nas.gov.uk/recordKeeping/PRSA/guidanceEleme">http://www.nas.gov.uk/recordKeeping/PRSA/guidanceEleme</a> nt10.asp

## Glasgow City Integration Joint Board (IJB) Compliance Statement

IJB's records are managed in accordance with the Council's Business Continuity and vital records arrangements.

Although we do not keep paper records we do have a plan for business continuity for identified IJB vital records. This includes copies of:

- Integration Scheme
- Strategic Plan
- · List of membership and relevant contact numbers
- Business Continuity Plan

## **Evidence**

Electronic information is held on Council IT systems which are supported by offsite backup and in some cases also by disaster recovery capabilities.

Staff who work with IJB records can access GCC's Business Continuity Management policy and procedures via Connect (the GCC intranet). In addition, staff who work with IJB records can access business continuity plans for all parts of the HSCP via EDRMS (the GCC file management system) – screenshot below.

## Further Development

Currently arranging for relevant information to be printed and inventory created which will be store securely.



20200214 IJB RMP Element 10 - screensh

RMP Element Description	Glasgow City Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
Element 11: Audit trail  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.  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.  Read further explanation and guidance about element 11 - <a href="http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement11.asp">http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement11.asp</a>	The IJB's records under this element are wholly covered by the arrangements of the Council.  Personal records, policies and procedures and all other corporate records will be accessed by employees through the parent bodies' information systems.	As outlined in Glasgow City Council's Records Management Plan:  http://www.glasgow.gov.uk/councillorsandcommittees/submissiondocuments.asp?submissionid=67023	As above for Element 2

RMP Element Description	Glasgow City Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
Element 12: Competency framework for records management staff  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.  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.  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.	Training for staff who have records management roles or undertake records management activities remains the responsibility of the employing bodies Glasgow City Council and NHS Greater Glasgow and Clyde.  Staff who are managing IJB records are employed by either Glasgow City Council or NHS Greater Glasgow and Clyde, and have received the relevant training for their role.	As outlined in Glasgow City Council and NHS Greater Glasgow and Clyde's respective Records Management Plans and training records from GOLD or LearnPro systems	As above for Element 2  Development of a process to provide the IJB with assurance that the staff members responsible for managing those records on its behalf have had the relevant training in the GCC systems and procedures. This will take the form of an annual assurance statement.

RMP Element Description	Glasgow City Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
Element 13: Assessment and review Section 1(5) (i)(a) of the Act says that an authority must keep its RMP under review.  An authority's RMP must describe the procedures in place to regularly review it in the future.  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.  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.  Read further explanation and guidance about element 13 – http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement13.asp	The Council's Records Management Policy is reviewed annually, with a major review carried out every 3 years or if any significant changes occur.  The Councils Records Management Plan is reviewed annually, so in line with this schedule the IJB will review and update their requirements each year.	Minutes of IJB meetings https://glasgowcity.hscp.scot/ glasgow-city-integration-joint- board-papers GCC Records Management Plan Review and Assessment Framework  GCC RMP Review and Assessment Fram	Establish schedule to review Records Management requirements annually and provide an assurance statement to the IJB. The 1st update will be due in February 2021

RMP Element Description	Glasgow City Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
Element 14: Shared Information  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.  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.  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.	Information is held by the Council, Health Board and IJB.  There is an existing information sharing protocol which is has been updated to reflect changes to these arrangements.	Council & NHS Data Sharing agreemer  2019-12-23 NHSGGC LAs ISP GD	As noted in Element 9 above, the Information Sharing Agreement has been approved and signed off by NHS GGC and GCC.