



Item No: 12

Meeting Date: Wednesday 12th December 2018

Glasgow City Integration Joint Board

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GLASGOW CITY IJB RECORDS MANAGEMENT PLAN

Purpose of Report:	To present the draft IJB Records Management Plan prepared in line with the requirements of the Public Records (Scotland) Act 2011.
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Background/Engagement:	IJB noted a report in October 2016 outlining the IJB's responsibilities under the Public Records (Scotland) Act 2011
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Recommendations:	The Integration Joint Board is asked to: a) note this report; b) delegate responsibility to the Chief Officer, Finance and Resources to finalise the IJB's Records Management Plan in collaboration with the Keeper of the Records of Scotland; and, c) instruct the Chief Officer, Finance and Resources to present the final agreed IJB Records Management Plan to the IJB or a committee of the IJB in due course.
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Relevance to Integration Joint Board Strategic Plan:

Relates to matters of governance.

Implications for Health and Social Care Partnership:

Reference to National Health & Wellbeing Outcome:	Relates to matters of governance.
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Personnel:	Relates to matters of governance.	
Carers:	Relates to matters of governance.	
Provider Organisations:	Relates to matters of governance.	
Equalities:	Relates to matters of governance.	
Financial:	Relates to matters of governance.	
Legal:	The IJB is required by statute to have a Records Management Plan in place and to adhere to the provisions of said plan. Where authorities fail to meet their obligations under the Public Records Act, the Keeper of the Records of Scotland has powers to undertake records management reviews and issue action notices for improvement.	
Economic Impact:	Relates to matters of governance.	
Sustainability:	Relates to matters of governance.	
Sustainable Procurement and Article 19:	Relates to matters of governance.	
Risk Implications:	Failure to establish a Records Management Plan would place the IJB in breach of its statutory duty.	
Implications for Glasgow City Council:	None arising from this report.	
Implications for NHS Greater Glasgow & Clyde:	None arising from this report.	
Direction Required to Council, Health Board or Both	Direction to:	
	1. No Direction Required	✓
	2. Glasgow City Council	
	3. NHS Greater Glasgow & Clyde	
	4. Glasgow City Council and NHS Greater Glasgow & Clyde	

1. Purpose

- 1.1 To present the draft IJB Records Management Plan prepared in line with the requirements of the Public Records (Scotland) Act 2011.

2. Background

- 2.1 The IJB noted a report in October 2016 outlining the IJB's responsibilities under the Public Records (Scotland) Act 2011
- 2.2 That report outlined that Glasgow City Integration Joint Board is a named authority under the Act, and would therefore be obliged to prepare and implement a records management plan which sets out arrangements for the management of their records.
- 2.3 The Keeper of the Records of Scotland has previously advised that IJBs will be informally advised of when they should expect a formal instruction to submit their Records Management Plan, and the timescale for doing so.
- 2.4 Indication from the Keeper of the Records of Scotland is that Glasgow City Integration Joint Board should expect to be formally advised in January 2019 that their Records Management Plan is due for submission, with a period of 3-6 months likely to be the timescale for this work to be completed.

3. IJB Records Management Plan

- 3.1 Ahead of formal notification from the Keeper, work has commenced to begin drafting a Records Management Plan for the Glasgow City Integration Joint Board.
- 3.2 It should be noted that only a very limited number of records relate to the Integration Joint Board in its own right, as for example records relating to operational delivery of services such as case files and medical records remain the responsibility of either the Council or Health Board. Documents such as IJB papers, records of members' interests etc. are held on Council and / or Health Board systems and so for the most part are encompassed within the Records Management Plan of the respective partner body.
- 3.3 A draft IJB Records Management Plan is appended to this report. Officers within Business Development will continue to liaise informally with the Keeper of the Records of Scotland to further develop this plan ahead of formal submission.

4. Recommendations

- 4.1 The Integration Joint Board is asked to:
 - a) note this report;
 - b) delegate responsibility to the Chief Officer: Finance and Resources to finalise the IJB's Records Management Plan in collaboration with the Keeper of the Records of Scotland; and,
 - c) instruct the Chief Officer: Finance and Resources to present the final agreed IJB Records Management Plan to the IJB or a committee of the IJB in due course.

Glasgow City Integration Joint Board Records Management Plan

Version 0.1
December 2018

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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 of its officers employees of constituent authorities supporting its work, contractors, agents, consultants and other trusted third parties who create public records on behalf of the authority, or manage public records held by the authority, are fully aware of and abide by this plan's arrangements.

About the Public Records (Scotland) Act 2011

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

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

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

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.

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 Glasgow City Integration Joint Board

The 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 6th February 2016.

From 1st 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 the Glasgow City IJB are detailed in the Integration Scheme. The area covered by Glasgow City IJB is coterminous with the Glasgow City Local Authority.

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 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 Board's over-arching strategic objective and helps it meet its strategic outcomes. Its information supports it to:

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

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

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

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

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 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.

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.

Glasgow City IJB Records Management Plan

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

RMP Element Description	Glasgow City Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p>Element 1: Senior management responsibility:</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>Read further explanation and guidance about element 1 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement1.asp</p>	<p>The Chief Officer has senior responsibility for all aspects of the Board's Records Management, and is the corporate owner of this document.</p> <p>The Chief Officer is also the Board'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>IJB Decision 31st October 2016 to designate CO as SIRO</p> <p>https://glasgowcity.hscp.scot/sites/default/files/publications/Glasgow_City_IJB_Minutes_31-10-16_APPROVED.pdf</p>	<p>What further development, if any, remains to be undertaken to bring this element into full compliance?</p>

RMP Element Description	Glasgow City Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p>Element 2: Records manager responsibility:</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 <u>must</u> name and provide the job title of the person responsible for the day-to-day operation of activities described in the elements in the authority's RMP. This person should be the Keeper's initial point of contact for records management issues. It is essential that an individual has overall day-to-day responsibility for the <u>implementation</u> of an authority's RMP. There may already be a designated person who carries out this role. If not, the authority will need to make an appointment. As with element 1 above, the RMP must name an individual rather than simply a job title. It should be noted that staff changes will not invalidate any submitted plan provided that the all records management responsibilities are transferred to the incoming post holder and relevant training is undertaken. This individual might not work directly for the scheduled authority. It is possible that an authority may contract out their records management service. If this is the case an authority may not be in a position to provide the name of those responsible for the day-to-day operation of this element. The authority must give details of the arrangements in place and name the body appointed to carry out the records management function on its behalf. It may be the case that an authority's records management programme has been developed by a third party. It is the person operating the programme on a day-to-day basis whose name should be submitted.</p> <p>Read further explanation and guidance about element 2 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement2.asp</p>	<p>The Operational Officer responsible for records management is:</p> <p>Allison Eccles, Head of Business Development</p> <p>Responsibilities include:</p> <ul style="list-style-type: none"> • 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 	<p>IJB Decision 31st October 2016 https://glasgowcity.hscp.scot/sites/default/files/publications/Glasgow_City_IJB_Minutes_31-10-16_APPROVED.pdf</p> <p>The IJB will need to secure a letter from the partner authority, or authorities, confirming that it creates, holds and manages into disposal all the IJB's records. This letter must confirm that all the IJB's records will be subject to the policies and procedures of the partner body or bodies. It will also confirm that IJB officers have access to these policies and procedures and that they are inducted and trained in relation to these where appropriate, for example Data Protection, Information Security, etc. Such a comprehensive letter will negate the need for the IJB to submit evidence in every instance and under each element. The letter will satisfy the Keeper that partner body evidence, already agreed by him under its/their plan, is robust for the purposes of the IJB's plan.</p>	<p>What further development, if any, remains to be undertaken to bring this element into full compliance?</p>

RMP Element Description	Glasgow City Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p>Element 3: Records management policy statement:</p> <p>The Keeper expects each authority's plan to include a records management policy statement. The policy statement should describe how the authority creates and manages authentic, reliable and useable records, capable of supporting business functions and activities for as long as they are required. The policy statement should be made available to all staff, at all levels in the authority. The statement will properly reflect the business functions of the public authority. The Keeper will expect authorities with a wide range of functions operating in a complex legislative environment to develop a fuller statement than a smaller authority. The records management statement should define the legislative, regulatory and best practice framework, within which the authority operates and give an overview of the records management processes and systems within the authority and describe how these support the authority in carrying out its business effectively. For electronic records the statement should describe how metadata is created and maintained. It should be clear that the authority understands what is required to operate an effective records management system which embraces records in all formats.</p> <p>The records management statement should 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>Read further explanation and guidance about element 3 – http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement3.asp</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 parent body organisations, i.e. Glasgow City Council and NHS Greater Glasgow and Clyde and as such will be covered by their respective record management plans.</p>	<p>NHS Greater Glasgow and Clyde: https://www.nhsggc.org.uk/media/243288/nhsggc-rmp-v21-july-2017.pdf</p> <p>Glasgow City Council: http://www.glasgow.gov.uk/councillorsandcommittees/submissiondocuments.asp?submissionid=67023</p>	<p>What further development, if any, remains to be undertaken to bring this element into full compliance?</p>
RMP Element Description	Glasgow City Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p>Element 4: Business classification</p> <p>The Keeper expects an authority to have properly considered business classification mechanisms and its RMP should therefore reflect the</p>	<p>As the IJB has only been in operation since 1st April 2016, the type and volume of record keeping specific to the IJB is</p>	<p>Glasgow City Council's Business Classification Scheme</p>	<p>What further development, if any, remains to be</p>

<p>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>Read further explanation and guidance about element 4 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement4.asp</p>	<p>evolving rapidly.</p> <p>The IJB will follow the corporate Business Classification Scheme (BCS) adopted by Glasgow City 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.</p>		<p>undertaken to bring this element into full compliance?</p>
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RMP Element Description	Glasgow City Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p>Element 5: Retention schedules</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</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</p>	<p>As outlined in Glasgow City Council and NHS Greater Glasgow and Clyde's respective Records Management Plans</p>	<p>What further development, if any, remains to be undertaken to bring this element into full</p>

<p>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"> • 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. <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>Read further explanation and guidance about element 5 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement5.asp</p>	<p>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 Board in making business-based disposal decisions against its records. These must take into consideration the Board’s statutory obligations.</p> <p>As the records will be created and managed by NHS Greater Glasgow and Clyde and Glasgow City Council, the IJB will follow what is agreed and in place.</p> <p>The Business Classification Scheme used by Glasgow City Council will determine how long documents should be retained.</p>		<p>compliance?</p>
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RMP Element Description	Glasgow City Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p>Element 6: Destruction arrangements</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>Read further explanation and guidance about element 6 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement6.asp</p>	<p>It is almost certainly going to be the case that destruction of IJB records, in all formats, will be undertaken by the partner body managing the IJB's records.</p> <p>All IJB Records will be held electronically on Glasgow City 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>As outlined in Glasgow City Council and NHS Greater Glasgow and Clyde's respective Records Management Plans</p>	<p>What further development, if any, remains to be undertaken to bring this element into full compliance</p>

RMP Element Description	Glasgow City Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p>Element 7: Archiving and transfer arrangements</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></p>	<p>All IJB Records will be held electronically on Glasgow City 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>The agreed arrangement between the IJB and Glasgow City Council for IJB records to be included in the archiving and transferring arrangements established by Glasgow City Council.</p>	<p>What further development, if any, remains to be undertaken to bring this element into full compliance</p>

<p>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>Read further explanation and guidance about element 7- http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement7.asp</p>			
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RMP Element Description	Glasgow City Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p>Element 8: Information Security</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 proper level of security for its public records.</p> <p>All public authorities produce records that are sensitive. An authority's RMP <u>must</u> therefore include evidence that the authority has procedures in place to adequately protect its records. Information security procedures would normally acknowledge data protection and freedom of information obligations as well as any specific legislation or regulatory framework that may apply to the retention and security of records.</p> <p>The security procedures <u>must</u> put in place adequate controls</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 and Clyde and Glasgow City Council arrangements in terms of systems, devices, information sharing platforms etc.</p> <p>All staff 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</p>	<p>As outlined in Glasgow City Council and NHS Greater Glasgow and Clyde's respective Records Management Plans</p>	<p>What further development, if any, remains to be undertaken to bring this element into full compliance</p>

<p>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>employer, i.e. NHS Greater Glasgow and Clyde Information Security Policy or Glasgow City Information Security policies.</p>		
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<p>RMP Element Description</p>	<p>Glasgow City Integration Joint Board (IJB) Compliance Statement</p>	<p>Evidence</p>	<p>Further Development</p>
<p>Element 9: Data protection</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, 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>Read further explanation and guidance about element 9 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement9.asp</p>	<p>The Information Commissioner has confirmed that the IJB is a data controller, albeit that it does not hold any personal records of service users/patients.</p> <p>The IJB is registered as a body subject to Freedom of Information laws, applies to the IJB and a local policy has been established, albeit that most requests will be addressed directly by the parent bodies.</p>	<p>As outlined in Glasgow City Council and NHS Greater Glasgow and Clyde's respective Records Management Plans</p>	<p>What further development, if any, remains to be undertaken to bring this element into full compliance</p>

RMP Element Description	Glasgow City Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p>Element 10: Business continuity and vital records</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>Read further explanation and guidance about element 10 - <u>http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement10.asp</u></p>	<p>IJB's records are managed in accordance with the Council's Business Continuity and vital records arrangements.</p> <p>All services will continue to be provided or commissioned directly by NHS Greater Glasgow and Clyde or Glasgow City Council. As such there is no direct requirement for the IJB to have its own arrangements for business continuity of vital records. However it will require that both bodies have adequate business continuity arrangements to ensure the sustainability of health and social care services for which the IJB has overall responsibility.</p>	<p>As outlined in Glasgow City Council and NHS Greater Glasgow and Clyde's respective Records Management Plans</p>	<p>What further development, if any, remains to be undertaken to bring this element into full compliance</p>

RMP Element Description	Glasgow City Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p>Element 11: Audit trail</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>Read further explanation and guidance about element 11 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement11.asp</p>	<p>The IJB's records under this element are wholly covered by the arrangements of the Council.</p> <p>Personal records, policies and procedures and all other corporate records will be accessed by employees through the parent bodies information systems. Should the IJB ever move to develop its own internal and external information systems, consideration will be given to the need for audit trail arrangements.</p>	<p>As outlined in Glasgow City Council's Records Management Plan</p>	<p>What further development, if any, remains to be undertaken to bring this element into full compliance</p>

RMP Element Description	Glasgow City Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p>Element 12: Competency framework for records management staff</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>Training for records management staff remains the responsibility of the employing bodies Glasgow City Council and NHS Greater Glasgow and Clyde.</p> <p>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.</p>	<p>As outlined in Glasgow City Council and NHS Greater Glasgow and Clyde's respective Records Management Plans</p>	<p>What further development, if any, remains to be undertaken to bring this element into full compliance</p> <p>CS 10 training to be extended to NHS Greater Glasgow and Clyde staff and in particular, the PA to the Director of Health and Social Care</p>

RMP Element Description	Glasgow City Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p>Element 13: Assessment and review</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 processes.</p> <p>A statement to support the authority's commitment to keep its RMP under review must appear in the RMP detailing how it will accomplish this task.</p> <p>Read further explanation and guidance about element 13 – http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement13.asp</p>	<p>This record management plan will be reviewed and updated through the Senior Management Team. During the first year any gaps in this plan will be identified as issues arise and solutions agreed.</p>	<p>As outlined in Glasgow City Council and NHS Greater Glasgow and Clyde's respective Records Management Plans</p>	<p>What further development, if any, remains to be undertaken to bring this element into full compliance</p> <p>Establish a RMP Planning Group to meet and review policy before formal ratification by IJB</p>

RMP Element Description	Glasgow City Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p>Element 14: Shared Information</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>IJB information is held by, and shared between, the Council and Health Board, who have an information sharing protocol in place.</p>	<p>https://www.nhsggc.org.uk/media/236748/124-nhsggc-protocol-for-sharing-information.pdf</p>	<p>What further development, if any, remains to be undertaken to bring this element into full compliance</p>