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**Item No: 13**

**Meeting Date: Wednesday 5<sup>th</sup> May 2021**

## **Glasgow City Integration Joint Board**

**Report By: Sharon Wearing, Chief Officer, Finance and Resources**

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

**Purpose of Report:**

To present the Integration Joint Board's Record Management Plan which has been submitted to and approved by the Keeper of the Records of Scotland in line with the requirements of the Public Records (Scotland) Act 2011, and also the Integration Joint Board's approved Privacy Statement in line with the EU General Data Protection Regulations and the UK Data Protection Act 2018.

**Background/Engagement:**

Integration Joint Boards are required to submit a Records Management Plan to the Keeper of Records of Scotland. The plan sets out how the Board's records will be created and managed in line with national policy. This is a responsibility which all public bodies must fulfil.

The draft Records Management Plan for Glasgow City Integration Joint Board was considered by the Board on 12 December 2018 where it agreed to:

- delegate responsibility to the Chief Officer Finance and Resources to finalise the plan in collaboration with the Keeper of Records of Scotland, and
- instructed the Chief Officer Finance and Resources to present the final agreed Records Management plan to the IJB or a committee of the IJB.

**Recommendations:**

The Integration Joint Board is asked to:

- a) Note the content of this report.

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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.

**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.

**Fairer Scotland Compliance:**

Not applicable.

**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.

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Direction Required to Council, Health Board or Both	
Direction to:	
1. No Direction Required	<input checked="" type="checkbox"/>
2. Glasgow City Council	<input type="checkbox"/>
3. NHS Greater Glasgow & Clyde	<input type="checkbox"/>
4. Glasgow City Council and NHS Greater Glasgow & Clyde	<input type="checkbox"/>

### 1. Purpose

- 1.1. The purpose of this report is to present the Integration Joint Board's Record Management Plan which has been submitted to and approved by the Keeper of the Records of Scotland in line with the requirements of the Public Records (Scotland) Act 2011, and also the Integration Joint Board's approved Privacy Statement in line with the EU General Data Protection Regulations and the UK Data Protection Act 2018.

### 2. Background

- 2.1. Integration Joint Boards are required to submit a Records Management Plan (RMP) to the Keeper of Records of Scotland (the Keeper). The plan sets out how the Board's records will be created and managed in line with national policy. This is a responsibility which all public bodies must fulfil.
- 2.2. The initial draft RMP for Glasgow City Integration joint Board (IJB) was considered by the Board on [12 December 2018](#) where it agreed to:
- delegate responsibility to the Chief Officer Finance and Resources to finalise the plan in collaboration with the Keeper of Records of Scotland, and
  - instructed the Chief Officer Finance and Resources to present the final agreed Records Management plan to the IJB or a committee of the IJB.

### 3. Content of the Records Management Plan

- 3.1. NHS Greater Glasgow and Clyde (NHS GGC) and Glasgow City Council (GCC) already have agreed Records Management Plans in place. These support the proper management of staff, service user, patient and other non-IJB records. IJBs were added to the Public Records Act 2011 schedule by the Public Bodies (Joint Working) (Scotland) Act 2014.
- 3.2. Formal notification was received from National Records Scotland in October 2018 that the Keeper was inviting Glasgow City IJB to submit its Records Management Plan by January 2019.
- 3.3. The initial draft RMP was submitted in January 2019, with the Chief Officer Finance and Resources receiving feedback and comments about the draft plan from the Keeper in January 2020. A further draft submission was made in August 2020 and feedback received in October 2020. The final submission of the RMP to the Keeper took place in January 2021, with the Keeper

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confirming approval and publication of the assessment of the Glasgow City RMP on the National Records Scotland website on 19 March 2021.

- 3.4. As the IJB does not hold any personal information about patients, service users or staff, the RMP relates to the IJB and its sub committees and plans and policies such as the Strategic Plan and Annual Performance Report. These records are already in the public domain via the IJB's pages on the Glasgow City HSCP [website](#).
- 3.5. As was detailed to the IJB at its meeting on [9 May 2018](#) when its requirements arising from General Data Protection Regulations were considered, all IJB information is held on Glasgow City Council's Electronic Document Records Management System (EDRMS) and is organised and managed in accordance with the Council's Business Classification Scheme. Given this, and following advice given by the National Records of Scotland, links to Glasgow City Council's RMP and arrangements are used where appropriate in the IJB's approved RMP.
- 3.6. The IJB's Record Management Plan will be published on the Glasgow City HSCP website and is included as Appendix A. Evidence required by the Keeper to support the RMP submission was included as embedded documents which are not accessible in the attached Appendix. If required, these documents can be made available to Members by request.

## 4. Privacy Statement

- 4.1. As was detailed to the IJB at its meeting on [9 May 2018](#) when its requirements arising from General Data Protection Regulations were considered, a Privacy Statement required to be created for the IJB. This is to outline what personal data the IJB processes and why, the legal basis for processing, how this information is stored and retained and with whom it is shared.
- 4.2. At its meeting on 9 May 2018, the IJB noted and agreed that as any personal data that would be processed by the IJB would likely be held on Council information systems that Dr Kenny Meechan who is the Data Protection Officer for the Council, also be appointed as the IJB Data Protection Officer.
- 4.3. The IJB Data Protection Officer approved the IJB Privacy Statement on 28 October 2020 and this will be published on the Glasgow City HSCP website and is included as Appendix B.

## 5. Recommendations

- 5.1. The Integration Joint Board is asked to:
  - a) Note the content of this report.

**Glasgow City Integration Joint Board  
Records Management Plan**

Version 1.1  
March 2021

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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 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.

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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.

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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.

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### Records management principles

Security – 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.

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 – 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.

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RMP Element Description	Glasgow City Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p><b>Element 1: Senior management responsibility:</b>                      Section 1(2)(a)(i) of the Act specifically requires a RMP to identify the individual responsible for the management of the authority’s public records. An authority’s RMP <u>must</u> name and provide the job title of the senior manager who accepts overall responsibility for the RMP that has been submitted.</p> <p>It is vital that the RMP submitted by an authority has the approval and support of that authority’s senior management team. Where an authority has already appointed a Senior Information Risk Owner, or similar person, they should consider making that person responsible for the records management programme. It is essential that the authority identifies and seeks the agreement of a senior post-holder to take overall responsibility for records management. That person is unlikely to have a day-to-day role in implementing the RMP, although they are not prohibited from doing so.</p> <p>As evidence, the RMP could include, for example, a covering letter signed by the senior post-holder. In this letter the responsible person named should indicate that they endorse the authority’s record management policy (See Element 3).</p> <p><a href="http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement1.asp">Read further explanation and guidance about element 1 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement1.asp</a></p>	<p>The Chief Officer 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 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><b>The Chief Officer (Interim) of Glasgow City Health and Social Care Partnership is Susanne Millar.</b></p>	<p>IJB Decision 31<sup>st</sup> October 2016 to designate CO as SIRO</p> <p><a href="https://glasgowcity.hscp.scot/sites/default/files/publications/Glasgow_City_IJB_Minutes_31-10-16_APPROVED.pdf">https://glasgowcity.hscp.scot/sites/default/files/publications/Glasgow_City_IJB_Minutes_31-10-16_APPROVED.pdf</a></p>	<p>No further development required. Measure fully implemented and evidenced.</p>

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RMP Element Description	Glasgow City 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 <u>must</u> name and provide the job title of the person responsible for the day-to-day operation of activities described in the elements in the authority's RMP. This person should be the Keeper's initial point of contact for records management issues. It is essential that an individual has overall day-to-day responsibility for the <u>implementation</u> of an authority's RMP. There may already be a designated person who carries out this role. If not, the authority will need to make an appointment. As with element 1 above, the RMP must name an individual rather than simply a job title. It should be noted that staff changes will not invalidate any submitted plan provided that the all records management responsibilities are transferred to the incoming post holder and relevant training is undertaken. This individual might not work directly for the scheduled authority. It is possible that an authority may contract out their records management service. If this is the case an authority may not be in a position to provide the name of those responsible for the day-to-day operation of this element. The authority must give details of the arrangements in place and name the body appointed to carry out the records management function on its behalf. It may be the case that an authority's records management programme has been developed by a third party. It is the person operating the programme on a day-to-day basis whose name should be submitted.</p> <p><a href="http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement2.asp">Read further explanation and guidance about element 2 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement2.asp</a></p>	<p>The Operational Officer responsible for records management is the HSCP's Head of Business Development.</p> <p>Responsibilities include:</p> <ul style="list-style-type: none"> <li>Managing the IJB's records</li> <li>Reviewing and implementing operational policies and procedures in line with the RMP</li> <li>Ensuring relevant health and social care staff have records management training.</li> </ul> <p><b>The Head of Business Development is Allison Eccles.</b></p>	<p>IJB Decision 31<sup>st</sup> October 2016  <a href="https://glasgowcity.hscp.scot/sites/default/files/publications/Glasgow_City_IJB_Minutes_31-10-16_APPROVED.pdf">https://glasgowcity.hscp.scot/sites/default/files/publications/Glasgow_City_IJB_Minutes_31-10-16_APPROVED.pdf</a></p> <p>MOU with GCC and IJB</p> <div data-bbox="1541 496 1608 571" data-label="Image"> </div> <p>MOU GCC IJB RMP - signed 20190226.pdf</p> <p><b>Person specification for Head of Business Development (previously titled Head of Service Modernisation):</b></p> <div data-bbox="1518 810 1585 874" data-label="Image"> </div> <p>20210301 IJB RMP Element 2 - Person Sp</p>	<p>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.</p>

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RMP Element Description	Glasgow City Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p><b>Element 3: Records management policy statement:</b>                      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><a href="http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement3.asp">Read further explanation and guidance about element 3 – http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement3.asp</a></p>	<p>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.</p>	<p>Policy statements and other supporting documentation are included in the GCC Records Management Plans:</p> <p><b>Glasgow City Council:</b>  <a href="http://www.glasgow.gov.uk/councillorsandcommittees/submissiondocuments.asp?submissionid=67023">http://www.glasgow.gov.uk/councillorsandcommittees/submissiondocuments.asp?submissionid=67023</a></p> <p>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):</p> <div style="text-align: center;">  <p>20200214 IJB RMP Element 3 - Screenshc</p> </div>	<p>As above for Element 2</p>
RMP Element Description	Glasgow City Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development

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**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](http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement4.asp)

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

The IJB 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.

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RMP Element Description	Glasgow City 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 href="http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement5.asp">Read further explanation and guidance about element 5_</a>  <a href="http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement5.asp">http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement5.asp</a></p>	<p>Currently records generated and maintained within the HSCP in support of the IJB are retained on the basis of the GCC RRDS. <b>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).</b> 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.</p>	<p>Glasgow City Council Records Retention Disposal Schedule on: <a href="http://www.glasgow.gov.uk/rrds">www.glasgow.gov.uk/rrds</a></p> <p>IJB Information Asset Register</p> <p align="center">             IJB IAR.xlsx         </p>	<p>The council also recognises that records are frequently held in IT applications (often legacy systems from pre-reorganisation) 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.</p>

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RMP Element Description	Glasgow City 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><a href="http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement6.asp">Read further explanation and guidance about element 6 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement6.asp</a></p>	<p>Any destruction of IJB records, in all formats, will be undertaken in accordance with Glasgow City Council's destruction arrangements.</p> <p>All IJB records will be held electronically on Glasgow City Council's EDRMS system with some documents published on GHSCP website for public information.</p> <p><a href="https://glasgowcity.hscp.scot/">https://glasgowcity.hscp.scot/</a> 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>Glasgow City Council Records Management Plan  <a href="http://www.glasgow.gov.uk/councilorsandcommittees/viewDoc.asp?c=P62AFQNTZLUTNT81">http://www.glasgow.gov.uk/councilorsandcommittees/viewDoc.asp?c=P62AFQNTZLUTNT81</a></p>	<p>As above for Element 2</p>

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RMP Element Description	Glasgow City 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><a href="http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement7.asp">Read further explanation and guidance about element 7- http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement7.asp</a></p>	<p>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.</p> <p>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.</p>	<p>Glasgow City Council Records Management Plan</p> <p><a href="http://www.glasgow.gov.uk/councillorsandcommittees/viewDoc.asp?c=P62AFQNTZLUTNT81">http://www.glasgow.gov.uk/councillorsandcommittees/viewDoc.asp?c=P62AFQNTZLUTNT81</a></p>	<p>As above for Element 2</p>

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<b>RMP Element Description</b>	<b>Glasgow City Integration Joint Board (IJB) Compliance Statement</b>	<b>Evidence</b>	<b>Further Development</b>
<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 proper level of security for its public records.</p> <p>All public authorities produce records that are sensitive. An authority’s RMP <u>must</u> therefore include evidence that the authority has procedures in place to adequately protect its records. Information security procedures would normally acknowledge data protection and freedom of information obligations as well as any specific legislation or regulatory framework that may apply to the retention and security of records.</p> <p>The security procedures <u>must</u> put in place adequate controls to prevent unauthorised access, destruction, alteration or removal of records. The procedures will allocate information security responsibilities within the authority to ensure organisational accountability and will also outline the mechanism by which appropriate security classifications are linked to its business classification scheme.</p>	<p>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.</p> <p>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.</p>	<p><b>Glasgow City Council RMP:</b></p> <p><a href="http://www.glasgow.gov.uk/councillorsandcommittees/submissiondocuments.asp?submissionid=67023">http://www.glasgow.gov.uk/councillorsandcommittees/submissiondocuments.asp?submissionid=67023</a></p> <p>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:</p> <p align="center">             20200214 IJB RMP            Element 8 - screenshc         </p> <p align="center">             20200214 IJB RMP            Element 8 - screenshc         </p>	<p>As above for Element 2</p>

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<b>RMP Element Description</b>	<b>Glasgow City Integration Joint Board (IJB) Compliance Statement</b>	<b>Evidence</b>	<b>Further Development</b>
<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, 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><a href="http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement9.asp">Read further explanation and guidance about element 9 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement9.asp</a></p>	<p>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)</p>	<p>IJB Privacy Notice</p>  <p>GCIJB Privacy version1 140120.docx</p> <p>Council &amp; NHS Data Sharing agreement.</p>  <p>2019-12-23 NHSGGC LAs ISP GD</p>	<p>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.</p> <p>A revised Council &amp; NHS Data Sharing Agreement has been developed and has been approved and signed by GCC and NHS GG&amp;C.</p>

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<b>RMP Element Description</b>	<b>Glasgow City Integration Joint Board (IJB) Compliance Statement</b>	<b>Evidence</b>	<b>Further Development</b>
<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 href="http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement10.asp">Read further explanation and guidance about element 10 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement10.asp</a></p>	<p>IJB's records are managed in accordance with the Council's Business Continuity and vital records arrangements.</p> <p>Although we do not keep paper records we do have a plan for business continuity for identified IJB vital records. This includes copies of:</p> <ul style="list-style-type: none"> <li>• Integration Scheme</li> <li>• Strategic Plan</li> <li>• List of membership and relevant contact numbers</li> <li>• Business Continuity Plan</li> </ul>	<p>Electronic information is held on Council IT systems which are supported by off-site backup and in some cases also by disaster recovery capabilities.</p> <p>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.</p> <div style="text-align: center;">  <p>20200214 IJB RMP Element 10 - screenshot</p> </div>	<p>Currently arranging for relevant information to be printed and inventory created which will be stored securely.</p>

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RMP Element Description	Glasgow City 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><a href="http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement11.asp">Read further explanation and guidance about element 11 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement11.asp</a></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.</p>	<p>As outlined in Glasgow City Council's Records Management Plan:</p> <p><a href="http://www.glasgow.gov.uk/councillorsandcommittees/submissiondocuments.asp?submissionid=67023">http://www.glasgow.gov.uk/councillorsandcommittees/submissiondocuments.asp?submissionid=67023</a></p>	<p>As above for Element 2</p>

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<b>RMP Element Description</b>	<b>Glasgow City Integration Joint Board (IJB) Compliance Statement</b>	<b>Evidence</b>	<b>Further Development</b>
<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>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.</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 and training records from GOLD or LearnPro systems</p>	<p>As above for Element 2</p> <p>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.</p>

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RMP Element Description	Glasgow City Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p><b>Element 13: Assessment and review</b>                      Section 1(5) (i)(a) of the Act says that an authority must keep its RMP under review.</p> <p>An authority's RMP <u>must</u> describe the procedures in place to regularly review it in the future.</p> <p>It is important that an authority's RMP is regularly reviewed to ensure that it remains fit for purpose. It is therefore vital that a mechanism exists for this to happen automatically as part of an authority's internal records management processes.</p> <p>A statement to support the authority's commitment to keep its RMP under review must appear in the RMP detailing how it will accomplish this task.</p> <p>Read further explanation and guidance about element 13 – <a href="http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement13.asp">http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement13.asp</a></p>	<p>The Council's Records Management Policy is reviewed annually, with a major review carried out every 3 years or if any significant changes occur.</p> <p>The Council's Records Management Plan is reviewed annually, so in line with this schedule the IJB will review and update their requirements each year.</p>	<p>Minutes of IJB meetings  <a href="https://glasgowcity.hscp.scot/glasgow-city-integration-joint-board-papers">https://glasgowcity.hscp.scot/glasgow-city-integration-joint-board-papers</a></p> <p>GCC Records Management Plan Review and Assessment Framework</p>  <p>GCC RMP Review and Assessment Fram</p>	<p>Establish schedule to review Records Management requirements annually and provide an assurance statement to the IJB. The 1<sup>st</sup> update will be due in February 2021</p>

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RMP Element Description	Glasgow City 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>Information is held by the Council, Health Board and IJB.</p> <p>There is an existing information sharing protocol which is has been updated to reflect changes to these arrangements.</p>	<p>Council &amp; NHS Data Sharing agreement.</p> <div align="center">  <p>2019-12-23 NHSGGC LAs ISP GD</p> </div>	<p>As noted in Element 9 above, the Information Sharing Agreement has been approved and signed off by NHS GGC and GCC.</p>

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**OFFICIAL****GDPR Privacy Statement****To be used when collecting personal data directly from the data subject.****Glasgow City Integration Joint Board Privacy Statement****Who we are:**

Glasgow City Integration Joint Board (GCIJB) is the body that develops the strategic plan for, and then oversees the delivery of, Community Health and Social Care Services in Glasgow City. It does so by executing statutory functions delegated to it by NHS Greater Glasgow and Clyde (NHSGGC) and Glasgow City Council (GCC). It guides and directs the work of the health and social care staff who work within Glasgow City Health and Social Care Partnership (GCHSCP) via directions to the Chief Officer who leads that organisation and to the Chief Officer Finance and Resources.

GCIJB is a statutory body established under the Public Bodies (Joint Working) (Scotland) Act 2014. It is based at Commonwealth House, 32 Albion Street, Glasgow, Scotland, G1 1LH. You can contact the Data Protection Officer for GCIJB by post to City Chambers, George Square, Glasgow, Scotland, G2 1DU or by email at: [dataprotection@glasgow.gov.uk](mailto:dataprotection@glasgow.gov.uk) and telephone on 0141 287 1055.

**Why do we need your personal information and what do we do with it?**

This notice is for all members of the community who may receive services from GCHSCP or give support to other persons who receive those services. It covers those who participate in research, consultations, surveys or community events relating to the work of GCIJB and its development of strategic plans. It is also for any persons who make representations directly to GCIJB, whether in the form of general enquiries, complaints or formal information requests. It is finally for voting and non-voting members of the Integration Joint Board itself, whose own details may be held either by GCIJB or on behalf of GCIJB.

GCIJB does not process a large amount of personal data and does not generally process sensitive personal information about users of community health and social care services, or any individuals other than its own Board members. Handling such personal data is generally unnecessary in order to devise strategies and monitor delivery of services. GCIJB will instead usually rely upon anonymised, aggregated or statistical data provided by the partner agencies (GCC and NHSGGC). One or both of those two statutory bodies would generally hold the individual personal data about service users from which the general data reported to GCIJB is derived.

However, there are occasions when we will process limited personal information relating to a limited number of individuals. This particularly applies to responding to representations made directly to GCIJB by members of the community we serve and also when consulting or liaising with partner organisations and individuals with whom we work to plan and deliver services. We will use this to maintain contact with strategic partners and to examine individual circumstances when appropriate to do so, directing the Chief Officer of GCHSCP and his or her staff to resolve specific issues on our behalf and to respond to enquiries and information requests submitted directly to ourselves. We will use information relating to GCIJB board members and partner organisations and individuals with whom we work in order to ensure the effective administration of the business of the IJB.

We will also use information to verify the identity of enquirers where required, contact relevant individuals by post, email or telephone, maintain our records and to demonstrate to our own auditors and external regulators that we are providing proper services in accordance with the law.

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### **Legal basis for using your information:**

We use the information referred to above to deliver functions described in the Glasgow City Integration scheme: <https://glasgowcity.hscp.scot/node/86> which has been developed under legal powers set out in The Public Bodies (Joint Working) (Scotland) Act 2014.

There are additionally specific statutory requirements in relation to responding to complaints, Freedom of Information requests and Subject Access Requests. The policies on these matters and their legal basis are set out on the website of GCHSCP: <https://glasgowcity.hscp.scot/>

When your personal information is processed, it is because this is necessary for the performance of tasks carried out in the public interest by GCIJB, as set out in the policies and legislation referred to above. In the case of specific enquiries requiring response, if you do not provide us with particular information we have asked for then we may not be able to provide these services to you.

We will only process more sensitive personal information about you where absolutely necessary for the purposes of the effective planning and oversight of social care health services and the management of health and social care systems as set out in the Data Protection Act 2018. As above, this will seldom be necessary, as personal information will mainly be held by the partner agencies. GCIJB would not usually ask for sensitive personal data about any identifiable individuals to be submitted directly to it.

### **Who do we share your information with?**

As is the case for all public bodies in Scotland, we will generally comply with requests for specific information from regulatory and law enforcement bodies where this is necessary and appropriate. However the main agencies with whom GCIJB will share information are the partner agencies NHS Greater Glasgow and Clyde (NHSGGC) and Glasgow City Council (GCC). This information sharing is covered by a data sharing agreement which is publicly available: *[link will be added when document is published]*

In particular, Glasgow City Council currently holds and processes records on behalf of GCIJB, as set out in the GCIJB Records Management Plan: *[link will be added when document is published]*, under the terms of a memorandum of understanding. This means that if you do submit enquiries or information requests directly to GCIJB, or work with GCIJB in respect of consultations and development of strategic plans, then your contact details and any other relevant information will be held on GCC information systems on behalf of GCIJB. This Records Management Plan has been approved in terms of the Public Records (Scotland) Act 2011.

This data sharing will be done in accordance with the terms of this privacy statement and the specific terms set out in the Data Sharing Agreement and Records Management Plan referred to above.

### **International transfers:**

We do not anticipate any need to transfer your personal data outwith the U.K. We will advise you if any such need arises and explain the reasons to you or your legal representative.

### **How long do we keep your information for?**

We only keep your personal information for the minimum period amount of time necessary. Sometimes this time period is set out in the law, but in most cases it is based on the business need. Because of the special arrangement for records management between GCIJB and GCC, the records retention and disposal schedule for GCIJB records is part of the retention schedule of GCC. This sets out how long that body holds different types of information, including the information it holds on our behalf. You can view this on their website at [www.glasgow.gov.uk/rrds](http://www.glasgow.gov.uk/rrds) or you can request a hard copy from the contact address stated above.

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### Your rights under data protection law:

- **access to your information** – you have the right to request a copy of the personal information that we hold about you.
- **correcting your information** – we want to make sure that your personal information is accurate, complete and up to date. Therefore you may ask us to correct any personal information about you that you believe does not meet these standards.
- **Deletion of your information** – you have the right to ask us to delete personal information about you where:
  - I. you think that we no longer need to hold the information for the purposes for which it was originally obtained
  - II. you have a genuine objection to our use of your personal information – see *Objecting to how we may use your information* below
  - III. our use of your personal information is contrary to law or our other legal obligations.

**Objecting to how we may use your information** – You have the right at any time to tell us to stop using your personal information for direct marketing purposes.

**Restricting how we may use your information** – in some cases, you may ask us to restrict how we use your personal information. This right might apply if we no longer have a basis for using your personal information but you don't want us to delete the data.

Where this right applies it will mean that we may only use the relevant personal information with your consent, for legal claims or where there are other public interest grounds to do so.

Please contact us as stated above if you wish to exercise any of these rights.

### Information you have given us about other people:

If you have provided anyone else's details to us, please make sure that you have told them that you have given their information to Glasgow City Integration Joint Board. We will only use this information as part of the handling of your enquiry or execution of duties referred to above. If they want any more information on how we will use their information they can visit our web site at <https://glasgowcity.hscp.scot/> or email [dataprotection@glasgow.gov.uk](mailto:dataprotection@glasgow.gov.uk).

### Complaints:

We aim to directly resolve all complaints about how we handle personal information. If your complaint is about how we have handled your personal information, you can contact GCIJB's Data Protection Officer by email at [dataprotection@glasgow.gov.uk](mailto:dataprotection@glasgow.gov.uk) or by telephone on 0141 287 1055.

However, you also have the right to lodge a complaint about data protection matters with the Information Commissioner's Office, who can be contacted by post at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. By phone on 0303 123 1113 (local rate) or 01625 545 745. Visit their website for more information at- <https://ico.org.uk/concerns>

If your complaint is not about a data protection matter you can find details on how to make a complaint about GCIJB on our website at:

<https://glasgowcity.hscp.scot/sites/default/files/publications/ITEM%20No%2017%20-%20Glasgow%20City%20IJB%20Complaints%20Handling%20%20Procedure.pdf>