



<b>Meeting of East Renfrewshire Health and Social Care Partnership</b>	Performance and Audit Committee
<b>Held on</b>	28 November 2018
<b>Agenda Item</b>	6
<b>Title</b>	Integration Joint Board Records Management Plan
<p><b>Summary</b></p> <p>Integration Joint Boards are required to submit a Records Management Plan (RMP) to the Keeper of the Records of Scotland. The RMP sets out how East Renfrewshire Integration Joint Board's records will be created and managed in line with national policy. This is a responsibility which all public bodies must fulfil.</p> <p>This report provides the Performance and Audit Committee with a draft submission and memorandum of understanding to support the submission.</p>	
<b>Presented by</b>	Stuart McMinigal, Business Support Manager
<p><b>Action Required</b></p> <p>The Performance and Audit Committee is asked to:</p> <ul style="list-style-type: none"> <li>- Note and comment on the content of the report</li> <li>- Endorse the draft IJB Records Management Plan and Memorandum of Understanding and remit to the Integration Joint Board for approval.</li> </ul>	

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**EAST RENFREWSHIRE HEALTH AND SOCIAL CARE PARTNERSHIP**

**PERFORMANCE AND AUDIT COMMITTEE**

**28 November 2018**

**Report by Julie Murray, Chief Officer**

**INTEGRATION JOINT BOARD RECORDS MANAGEMENT PLAN**

**PURPOSE OF REPORT**

1. This report introduces the Integration Joint Board's Records Management Plan (RMP) Appendix 1 and Memorandum of Understanding (MoU) Appendix 2, seeks Performance and Audit committee's comments on the content and also requests that PAC remit the RMP and MoU to the Integration Joint Board for approval.

**RECOMMENDATION**

2. It is recommended that the Performance and Audit committee:-
  - Note and comment on the content of the report
  - Endorse the draft IJB Records Management Plan and Memorandum of Understanding and remit to the Integration Joint Board for approval.

**BACKGROUND**

3. The Integration Joint Board is obliged to submit and maintain a Records Management Plan (RMP) as defined in and in accordance with Part 1 of the Public Records (Scotland) Act 2011. The Act requires named public authorities to submit a RMP to be agreed by the Keeper of the Records of Scotland.

**REPORT**

**Legislation**

4. Every authority to which Part 1 of the Public Records (Scotland) Act 2011 applies must:
  - prepare a plan (a "records management plan") setting out proper arrangements for the management of the authority's public records,
  - submit the plan to the Keeper for agreement, and
  - ensure that its public records are managed in accordance with the plan as agreed with the Keeper. An authority's records management plan must:
    - identify the individual who is responsible for management of the authority's public records, and
    - (if different) identify the individual who is responsible for ensuring compliance with the plan
  - Include provision about the procedures to be followed in managing public records, maintaining the security of information contained in the public records, and the archiving and destruction or other disposal of the public records.

5. Statutory Agencies are more accountable to the public 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 Integration Joint Boards are fully committed to creating, managing, disclosing, protecting and disposing of information effectively and legally. As such, Integration Joint Boards must comply with the Public Records (Scotland) Act 2011. Breach of this could incur penalties.

#### Content of the Records Management Plan (RMP) and Memorandum of Understanding (MoU)

6. NHS Greater Glasgow and Clyde and East Renfrewshire Council already have agreed Records Management Plans in place. Integration Joint Boards were added to the Act's schedule by the Public Bodies (Joint Working) (Scotland) Act 2014.
7. Formal notification was received in October 2018 from National Records Scotland that the Keeper was inviting East Renfrewshire Integration Joint Board to submit its Records Management Plan by January 2019.
8. The attached RMP and MoU sets out the arrangements for the management of the Integration Joint Board's records and the relationship with NHS Greater Glasgow and Clyde's and East Renfrewshire Council's respective RMPs.
9. As the Integration Joint Board does not hold any personal information about either patients/clients or staff, the RMP relates to the IJB and sub committees and plans and policies such as the Annual Performance Report and the Strategic Plan. All of this information is already in the public domain via the IJB's pages on East Renfrewshire Council's website.
10. East Renfrewshire Council's Business Classification Scheme is used to organise the Integration Joint Board's records as all IJB records are currently managed and stored by East Renfrewshire Council. In terms of evidence that the IJB meets the requirements of each element of the RMP, links to East Renfrewshire Council's RMPs are used where appropriate. This follows the advice given by National Records of Scotland, who provided guidance and support throughout the drafting of the RMP and MoU.
11. As an organisation, East Renfrewshire Integration Joint Board is committed to being organised internally via utilising ERC's Business Classification Scheme, as well as ensuring its records are readily available externally via the IJB's pages on East Renfrewshire Council's website.
12. The RMP and MoU 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 East Renfrewshire Integration Joint Board annually.

### Policy Implications

13. Information underpins the Integration Joint Board's overarching 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.
  
14. Good recordkeeping practices lead to greater productivity as less time is taken to locate information. Well managed records will help the Integration Joint Board 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.

### **RECOMMENDATION**

15. It is recommended that the Performance and Audit committee:-
  - Note and comment on the content of the report
  - Endorse the draft IJB Records Management Plan and Memorandum of Understanding and remit to the Integration Joint Board for approval.

### **REPORT AUTHOR AND PERSON TO CONTACT**

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### **BACKGROUND PAPERS**

Integration Joint Board webpage:  
<https://www.eastrenfrewshire.gov.uk/article/6437/East-Renfrewshire-Integration-Joint-Board>

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# East Renfrewshire Integration Joint Board Records Management Plan

**Submitted in accordance with the Public Records  
(Scotland) Act 2011**

This plan is fully endorsed by the Chief Officer of East Renfrewshire Integration Joint Board who will ensure compliance with the Public Records (Scotland) Act 2011 through the corporate implementation of this Records Management Plan.

Signed by:

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Julie Murray, Chief Officer, East Renfrewshire Integration Joint Board

## Document Control Information

Revision	Date	Revision Description
1.0	22/10/2018	Draft circulated for comment

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## Table of Contents

<b>Records Management Plan .....</b>	<b>1</b>
<b>Summary .....</b>	<b>1</b>
<b>About the Public Records (Scotland) Act 2011.....</b>	<b>2</b>
<b>About the Integration Joint Boards/Midlothian Integration Joint Board.....</b>	<b>2</b>
<b>Review.....</b>	<b>3</b>
<b>RMP Principles .....</b>	<b>4</b>
<b>Element 1: Senior management responsibility.....</b>	<b>6</b>
<b>Element 2: Records manager responsibility .....</b>	<b>7</b>
<b>Element 3: Records management policy statement.....</b>	<b>8</b>
<b>Element 4: Business classification .....</b>	<b>9</b>
<b>Element 5: Retention schedules .....</b>	<b>10</b>
<b>Element 6: Destruction arrangements .....</b>	<b>11</b>
<b>Element 7: Archiving and transfer arrangements.....</b>	<b>12</b>
<b>Element 8: Information Security .....</b>	<b>13</b>
<b>Element 9: Data protection.....</b>	<b>14</b>
<b>Element 10: Business continuity and vital records.....</b>	<b>15</b>
<b>Element 11: Audit trail .....</b>	<b>16</b>
<b>Element 12: Competency framework for records management staff .....</b>	<b>17</b>
<b>Element 13: Assessment and review.....</b>	<b>18</b>
<b>Element 14: Shared Information .....</b>	<b>19</b>

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## Records Management Plan

### Summary

This Records Management Plan (RMP) conforms to the model Records Management Plan as set out by the Keeper of the Records of Scotland, in accordance with the provisions of the Public Records (Scotland) Act 2011. This RMP covers East Renfrewshire Integration Joint Board, referred to as 'the IJB' throughout.

The RMP outlines and evidences the IJB's policies and procedures regarding the creation, use, management and disposal of the public records it creates and uses in pursuance of its statutory functions.

### **In line with the model plan, the IJB's RMP addresses 14 elements:**

Element 1: Senior management responsibility

Element 2: Records manager responsibility

Element 3: Records management policy statement

Element 4: Business classification

Element 5: Retention schedule

Element 6: Destruction arrangements

Element 7: Archiving and transfer arrangements

Element 8: Information security

Element 9: Data protection

Element 10: Business continuity and vital records

Element 11: Audit trail

Element 12: Competency framework for records management staff

Element 13: Assessment and review

Element 14: Shared Information

The IJB is fully committed to compliance with the requirements of the Public Records (Scotland) Act, 2014 which came into force on the 1st January 2016. The IJB 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 Midlothian Integration Joint Board.

This RMP sets out and evidences proper arrangements for the management of the IJB's public records and is submitted for agreement by the Keeper of the Records of Scotland under Section 1 of the Public Records (Scotland) Act 2011. It will be reviewed by the IJB annually.

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

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

## **About Integration Joint Boards**

The integration of health and social care is part of the Scottish Government's programme of reform to improve care and support for those who use health and social care services. It is one of the Scottish Government's top priorities.

The Public Bodies (Joint Working) (Scotland) Act provides the legislative framework for the integration of health and social care services in Scotland.

It will put in place:

- Nationally agreed outcomes, which will apply across health and social care, in service planning by Integration Joint Boards and service delivery by NHS Boards and Local Authorities.
- A requirement on NHS Boards and Local Authorities to integrate health and social care budgets.
- A requirement on Partnerships to strengthen the role of clinicians and care professionals, along with the third and independent sectors, in the planning and delivery of services.

## **About East Renfrewshire Integration Joint Board**

The East Renfrewshire Integration Joint Board was established under the Public Bodies (Joint Working) Scotland Act 2014.

The order to establish the IJB was laid in the Scottish Parliament on Friday 29 May and came in to force on Saturday 27<sup>th</sup> June 2015.

From 1<sup>st</sup> April 2016 East Renfrewshire 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 East Renfrewshire Council.

These include children and families, adult social care services and criminal justice services and adult health community. The area covered by East Renfrewshire IJB is coterminous with the East Renfrewshire Local Authority.

The IJB operates as a body corporate (a separate legal entity), acting independently of NHS Greater Glasgow and Clyde and East Renfrewshire Council. The IJB consists of eight voting members appointed in equal number by NHS Greater Glasgow and Clyde and East Renfrewshire Council, with a number of Non-voting 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, Clinical Director, Chief Nurse and Chief Social Work Officer.

The IJB's key functions are to:

- Prepare a Plan for integrated functions that is in accordance with national and local outcomes and integration principles
- Allocate the integrated budget in accordance with the Plan
- Oversee the delivery of services that are within the scope of the Partnership.

Information underpins the IJB's over-arching strategic objective and helps it meet its strategic outcomes. 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 Board is fully committed to creating, managing, disclosing, protecting and disposing of information effectively and legally.

## **Review**

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

## RMP Principles

### What does the Records Management Plan cover?

Records management covers records of all formats and media. This includes paper and computer records. Records management is needed throughout the lifecycle of a record, and the process begins when the decision to create the record is taken.

### Why is records management important?

Records are vital for the effective functioning of the IJB: they support 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.

## **East Renfrewshire IJB Records Management Plan**

The context of this plan is that most records including employment, service user and internal policies and procedures will continue to be managed in the parent body organisations, i.e. East Renfrewshire Council and NHS Greater Glasgow and Clyde and as such will be covered by their respective record management plans.

As such, this RMP relates to the IJB committees (Integration Joint Board, Audit and Performance and Committee and Strategic Planning Group) and plans and policies such as the Annual Performance Report and the, Strategic Plan. All of this information is already in the public domain via the IJB's pages on East Renfrewshire Council's website

<https://www.eastrenfrewshire.gov.uk/health>

<https://www.eastrenfrewshire.gov.uk/article/8044/East-Renfrewshire-Integration-Joint-Board>

The IJB has agreed with East Renfrewshire Council that all of the IJB's records will be managed by East Renfrewshire Council. The plan will be continuously reviewed and updated.

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RMP Element Description	East Renfrewshire Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p><b>Element 1: Senior management responsibility:</b></p> <p>Section 1(2)(a)(i) of the Act specifically requires a RMP to identify the individual responsible for the management of the authority's public records. An authority's RMP <u>must</u> name and provide the job title of the senior manager who accepts overall responsibility for the RMP that has been submitted.</p> <p>It is vital that the RMP submitted by an authority has the approval and support of that authority's senior management team. Where an authority has already appointed a Senior Information Risk Owner, or similar person, they should consider making that person responsible for the records management programme. It is essential that the authority identifies and seeks the agreement of a senior post-holder to take overall responsibility for records management. That person is unlikely to have a day to day role in implementing the RMP, although they are not prohibited from doing so.</p> <p>As evidence, the RMP could include, for example, a covering letter signed by the senior post-holder. In this letter the responsible person named should indicate that they endorse the authority's record management policy (See Element 3).</p> <p><a href="#">Read further explanation and guidance about element 1.</a></p>	<p>The Chief Officer, Julie Murray 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 chairs the Departmental Management Team, which has strategic responsibility for the Health and Social Care Partnership.</p>	<p>Job Description and IJB appointment paper of Chief Officer ( Hard Copy)</p>	<p>What further development, if any, remains to be undertaken to bring this element into full compliance?</p>

RMP Element Description	East Renfrewshire Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p><b>Element 2: Records manager responsibility:</b></p> <p>Section 1(2) (a)(ii) of the Act specifically requires a RMP to identify the individual responsible for ensuring the authority complies with its plan. An authority's RMP <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.</p> <p>It is essential that an individual has overall day-to-day responsibility for the implementation of an authority's RMP. There may already be a designated person who carries out this role. If not, the authority will need to make an appointment. As with element 1 above, the RMP must name an individual rather than simply a job title. It should be noted that staff changes will not invalidate any submitted plan provided that the all records management responsibilities are transferred to the incoming post holder and relevant training is undertaken. This individual might not work directly for the scheduled authority.</p> <p>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.</p> <p>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="#">Read further explanation and guidance about element 2</a></p>	<p>The Operational Officer responsible for records management is:</p> <p>East Renfrewshire Council : Craig Geddes Council Records Manager</p> <p>Responsibilities include oversight of</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> </ul> <p>Ensuring relevant health and social care staff have records management training</p>	<p>The MoU accompanying this document nominates this roles within East Renfrewshire Council, as the lead with operational responsibility. ( Hard Copy)</p> <p>Council Records Manager Job description included as evidence to demonstrate that the named individual has the skills required and can access all IJB records. ( Hard Copy)</p> <p>The MoU sets out that the IJB's records are created and managed by the partner body, East Renfrewshire Council. It indicates that the CO is satisfied that the partner body has appropriate records management arrangements in place. ( Hard Copy)</p>	<p>What further development, if any, remains to be undertaken to bring this element into full compliance?</p>

RMP Element Description	East Renfrewshire Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p><b>Element 3: Records management policy statement:</b></p> <p>The Keeper expects each authority's plan to include a records management policy statement. The policy statement should describe how the authority creates and manages authentic, reliable and useable records, capable of supporting business functions and activities for as long as they are required. The policy statement should be made available to all staff, at all levels in the authority. The statement will properly reflect the business functions of the public authority. The Keeper will expect authorities with a wide range of functions operating in a complex legislative environment to develop a fuller statement than a smaller Authority.</p> <p>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.</p> <p>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.</p> <p>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="#">Read further explanation and guidance about element 3.</a></p>	<p>East Renfrewshire Council and NHS Greater Glasgow and Clyde work in partnership, governed by the East Renfrewshire Integration Joint Board (IJB).</p> <p>East Renfrewshire IJB is responsible for planning health and care services for the East Renfrewshire population.</p> <p>The context of this plan is that most records including employment, service user and internal policies and procedures will continue to be managed in the parent body organisations, i.e. East Renfrewshire Council and NHS Greater Glasgow and Clyde and as such will be covered by their respective record management plans.</p> <p>The records covered by this plan constitute IJB business in terms of:</p> <ul style="list-style-type: none"> <li>• IJB Meetings- agendas and papers, including Directions</li> <li>• IJB Strategies and Policies, including the Annual Report, Strategic Plan and Delivery Plan</li> </ul> <p>All of this information is already in the public domain via the IJB's pages on East Renfrewshire Council's website</p> <p><a href="https://www.eastrenfrewshire.gov.uk/health">https://www.eastrenfrewshire.gov.uk/health</a></p> <p><a href="https://www.eastrenfrewshire.gov.uk/article/8044/East-Renfrewshire-Integration-Joint-Board">https://www.eastrenfrewshire.gov.uk/article/8044/East-Renfrewshire-Integration-Joint-Board</a></p>	<p>East Renfrewshire Council Records Management Policy</p> <p><a href="https://www.eastrenfrewshire.gov.uk/records-management-policy">https://www.eastrenfrewshire.gov.uk/records-management-policy</a></p>	<p>What further development, if any, remains to be undertaken to bring this element into full compliance?</p>

RMP Element Description	East Renfrewshire Integration Joint Board (IJB) Compliance Statement <del>44</del>	Evidence	Further Development
<p><b>Element 4: Business classification</b></p> <p>The Keeper expects an authority to have properly considered business classification mechanisms and its RMP should therefore reflect the functions of the authority by means of a business classification scheme or similar.</p> <p>A business classification scheme usually takes the form of a hierarchical model or structure diagram. It records, at a given point in time, the informational assets the business creates and maintains, and in which function or service area they are held. As authorities change the scheme should be regularly reviewed and updated. 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.</p> <p>An authority will need to demonstrate that its business classification scheme can be applied to the record systems which it operates.</p> <p><a href="#">Read further explanation and guidance about element 4.</a></p>	<p>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.</p> <p>The IJB will follow the corporate Business Classification Scheme (BCS) adopted by East Renfrewshire Council which identifies its high-level functions and activities. These functions cut across the divisional structures of the Council, enabling the BCS to remain relevant in the event of structural changes to the organisation. East Renfrewshire's BCS has been updated to include IJB records.</p> <p>This has been discussed and agreed as a sensible approach by NHS Greater Glasgow and Clyde and East Renfrewshire Council</p>	<p>The link to East Renfrewshire Council BCS is attached below</p> <p><a href="https://www.eastrenfrewshire.gov.uk/business-classification">https://www.eastrenfrewshire.gov.uk/business-classification</a></p>	<p>What further development, if any, remains to be undertaken to bring this element into full compliance?</p>

RMP Element Description	East Renfrewshire Integration Joint Board (IJB) Compliance Statement <sup>45</sup>	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. An authority's RMP must demonstrate the existence of and adherence to corporate records retention procedures.</p> <p>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 must demonstrate the principle that retention rules are consistently applied across all of an authority's record systems.</p> <p><a href="#">Read further explanation and guidance about element 5.</a></p>	<p>A retention schedule is a list of records for which pre-determined disposal dates have been established</p> <p>The corporate records including formal IJB reports and minutes will be managed in accordance with the IJB Board Servicing Committee Protocol.</p> <p>The Business Records Retention Scheme used by East Renfrewshire Council determines how long documents should be retained. Some IJB papers are part of the Committee Management System and as such have permanent retention status</p>	<p>East Renfrewshire Council Retention Schedule Document</p> <p><a href="https://www.eastrenfrewshire.gov.uk/retention-schedule">https://www.eastrenfrewshire.gov.uk/retention-schedule</a></p>	<p>What further development, if any, remains to be undertaken to bring this element into full compliance?</p>

RMP Element Description	East Renfrewshire Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p><b>Element 6: Destruction arrangements</b></p> <p>Section 1(2) (b)(iii) of the Act specifically requires a RMP to include provision about the archiving and destruction, or other disposal, of an authority's public records.</p> <p>An authority's RMP <u>must</u> demonstrate that proper destruction arrangements are in place.</p> <p>A retention schedule, on its own, will not be considered adequate proof of disposal for the Keeper to agree a RMP. It must be linked with details of an authority's destruction arrangements. These should demonstrate security precautions appropriate to the sensitivity of the records. Disposal arrangements must also ensure that all copies of a record – wherever stored – are identified and destroyed.</p> <p><a href="#">Read further explanation and guidance about element 6.</a></p>	<p>The destruction of IJB records, in all formats, will be undertaken by East Renfrewshire Council.</p> <p>All IJB Records will be held electronically on East Renfrewshire Council's system therefore no hard copies will require destruction with the exception of signed copies of minutes which will be held as part of ERC destruction policy.</p> <p>Destruction of electronic media and digital hardware is carried out in accordance with ERC policies</p>	<p>East Renfrewshire Council Records Disposal Policy</p> <p><a href="https://www.eastrenfrewshire.gov.uk/destruction-arrangements">https://www.eastrenfrewshire.gov.uk/destruction-arrangements</a></p>	<p>What further development, if any, remains to be undertaken to bring this element into full compliance?</p>

RMP Element Description	East Renfrewshire Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p><b>Element 7: Archiving and transfer arrangements</b></p> <p>Section 1(2)(b)(iii) of the Act specifically requires a RMP to make provision about the archiving and destruction, or other disposal, of an authority's public records.</p> <p>An authority's RMP must 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 must 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 must 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.</p> <p>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="#">Read further explanation and guidance about element 7.</a></p>	<p>All IJB Records will be held electronically on East Renfrewshire Council's system so no hard copies will be archived as per element 6</p> <p>Electronic archiving policies will be determined at a later date. At this stage there is only a limited volume of records specific to the IJB.</p> <p>In terms of a procedure, the IJB will follow the Council's plans whereby records are moved into a secure offsite</p> <p>IJB records will be managed with regard to ERC archiving policies</p>	<p>The agreed arrangement between the Board and East Renfrewshire Council for IJB records to be included in the archiving and transferring arrangements established by East Renfrewshire Council.</p> <p><a href="https://www.eastrenfrewshire.gov.uk/archive-transfer">https://www.eastrenfrewshire.gov.uk/archive-transfer</a></p>	<p>What further development, if any, remains to be undertaken to bring this element into full compliance?</p>

RMP Element Description	East Renfrewshire Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p><b>Element 8: Information Security</b></p> <p>Section 1(2) (b)(ii) of the Act specifically requires a RMP to make provision about the archiving and destruction or other disposal of the authority's public records.</p> <p>An authority's RMP <u>must</u> make provision for the proper level of security for its public records. All public authorities produce records that are sensitive. An authority's RMP <u>must</u> therefore include evidence that the authority has procedures in place to adequately protect its records. Information security procedures would normally acknowledge data protection and freedom of information obligations as well as any specific legislation or regulatory framework that may apply to the retention and security of records.</p> <p>The security procedures must put in place adequate controls to prevent unauthorised access, destruction, alteration or removal of records. The procedures will allocate information security responsibilities within the authority to ensure organisational accountability and will also outline the mechanism by which appropriate security classifications are linked to its business classification scheme.</p> <p><a href="#">Read further explanation and guidance about element 8.</a></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 East Renfrewshire 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 East Renfrewshire Council. As such they will be subject to the policies and procedures of their employer, i.e.</p> <p><b>NHS Greater Glasgow and Clyde Information Security Policy</b></p> <p><a href="http://library.nhsggc.org.uk/mediaAssets/library/InformationGovernancePolicy09Jul02.pdf">http://library.nhsggc.org.uk/mediaAssets/library/InformationGovernancePolicy09Jul02.pdf</a> or East Renfrewshire Council Information Security Policy</p> <p><a href="http://intranet.erc.insider/article/1288/Policy">http://intranet.erc.insider/article/1288/Policy</a></p>	<p>East Renfrewshire Council Information Security Policy</p> <p><a href="http://intranet.erc.insider/article/1288/Policy">http://intranet.erc.insider/article/1288/Policy</a></p> <p><a href="https://www.eastrenfrewshire.gov.uk/information-security">https://www.eastrenfrewshire.gov.uk/information-security</a></p> <p>East Renfrewshire Information Security Group Remit: ( Hard Copy)</p>	<p>What further development, if any, remains to be undertaken to bring this element into full compliance?</p>



RMP Element Description	East Renfrewshire Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p><b>Element 9: Data protection</b></p> <p>The Keeper will expect an authority's RMP to indicate compliance with its data protection obligations. This might be a high level statement of public responsibility and fair processing.</p> <p>If an authority holds and process information about stakeholders, clients, employees or suppliers, it is legally obliged to protect that information. Under the Data Protection Act, 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="#">Read further explanation and guidance about element 9.</a></p>	<p>All IJB Records will be held electronically on East Renfrewshire Council's system so no hard copies will be archived as per element 6</p> <p>Electronic archiving policies will be determined at a later date. At this stage there is only a limited volume of records specific to the IJB.</p> <p>In terms of a procedure, the IJB will follow the Council's plans whereby records are moved into a secure offsite</p> <p>IJB records will be managed with regard to ERC archiving policies</p>	<p>The agreed arrangement between the Board and East Renfrewshire Council for IJB records to be included in the archiving and transferring arrangements established by East Renfrewshire Council.</p> <p><a href="https://www.eastrenfrewshire.gov.uk/archive-transfer">https://www.eastrenfrewshire.gov.uk/archive-transfer</a></p>	<p>What further development, if any, remains to be undertaken to bring this element into full compliance?</p>

RMP Element Description	East Renfrewshire Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p><b>Element 10: Business continuity and vital records</b></p> <p>The Keeper will expect an authority's RMP to indicate arrangements in support of records vital to business continuity. Certain records held by authorities are vital to their function. These might include insurance details, current contract information, master personnel files, case files, etc. The RMP will support reasonable procedures for these records to be accessible in the event of an emergency affecting their premises or systems. 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="#">Read further explanation and guidance about element 10.</a></p>	<p>A business continuity and vital records plan serves as the main resource for the preparation for, response to, and recovery from, an emergency that might affect any number of crucial functions in an authority. The IJB's records will be subject to the policies and procedures of the partner body in relation to business continuity.</p> <p>The MoU sets out that the IJB's records are managed in accordance with East Renfrewshire Council's Business Continuity and vital records arrangements.</p> <p>All services will continue to be provided or commissioned directly by NHS Greater Glasgow and Clyde or East Renfrewshire Council. As such there is no direct requirement for the IJB to have its own arrangements for business continuity of vital records.</p> <p>Both NHS Greater Glasgow and Clyde and East Renfrewshire Council have adequate business continuity arrangements to ensure the sustainability of health and social care services for which the IJB has overall responsibility.</p>	<p>East Renfrewshire Council Business Continuity Plan</p> <p><a href="https://www.eastrenfrewshire.gov.uk/business-continuity">https://www.eastrenfrewshire.gov.uk/business-continuity</a></p>	<p>What further development, if any, remains to be undertaken to bring this element into full compliance?</p>

RMP Element Description	East Renfrewshire Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p><b>Element 11: Audit trail</b></p> <p>The Keeper will expect an authority's RMP to provide evidence that the authority maintains a complete and accurate representation of all changes that occur in relation to a particular record. For the purpose of this plan 'changes' can be taken to include movement of a record even if the information content is unaffected. Audit trail information must be kept for at least as long as the record to which it relates.</p> <p>This audit trail can be held separately from or as an integral part of the record. It may be generated automatically, or it may be created manually.</p> <p><a href="#">Read further explanation and guidance about element 11</a></p>	<p>The IJB's records are created by NHS Greater Glasgow and Clyde and East Renfrewshire Council and are managed via East Renfrewshire Council.</p>	<p>The MoU sets out the IJB's Audit Trail arrangements</p> <p>As per Element 2</p>	<p>What further development, if any, remains to be undertaken to bring this element into full compliance?</p>

RMP Element Description	East Renfrewshire Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p><b>Element 12: Competency framework for records management staff</b></p> <p>The Keeper will expect an authority's RMP to detail a competency framework for person(s) designated as responsible for the day-to-day operation of activities described in the elements in the authority's RMP. It is important that authorities understand that records management is best implemented by a person or persons possessing the relevant skills.</p> <p>A competency framework outlining what the authority considers are the vital skills and experiences needed to carry out the task is an important part of any records management system. If the authority appoints an existing non- records professional member of staff to undertake this task, the framework will provide the beginnings of a training programme for that person.</p> <p>The individual carrying out day-to-day records management for an authority might not work for that authority directly. It is possible that the records management function is undertaken by a separate legal entity set up to provide functions on behalf of the authority, for example an arm's length body or a contractor. Under these circumstances the authority must satisfy itself that the supplier supports and continues to provide a robust records management service to the authority.</p> <p><a href="#">Read further explanation and guidance about element 12.</a></p>	<p>The IJB will rely upon the records manager of the partner body for compliance under this element.</p> <p>Training for records management staff will remain the responsibility of the employing body East Renfrewshire Council</p>	<p>East Renfrewshire Council Competency Framework</p> <p><a href="https://www.eastrenfrewshire.gov.uk/competency-framework">https://www.eastrenfrewshire.gov.uk/competency-framework</a></p>	<p>What further development, if any, remains to be undertaken to bring this element into full compliance?</p>

RMP Element Description	East Renfrewshire Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p><b>Element 13: Assessment and review</b></p> <p>Section 1(5) (i)(a) of the Act says that an authority must keep its RMP under review.</p> <p>An authority's RMP <u>must</u> describe the procedures in place to regularly review it in the future.</p> <p>It is important that an authority's RMP is regularly reviewed to ensure that it remains fit for purpose. It is therefore vital that a mechanism exists for this to happen automatically as part of an authority's internal records management 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><a href="#">Read further explanation and guidance about element 13.</a></p>	<p>The IJB relies on East Renfrewshire Council to ensure that the systems, policies and procedures that govern its records are regularly assessed.</p> <p>The record management plan will be reviewed and updated through the Department Management Team. During the first year any gaps in this plan will be identified as issues arise and solutions agreed.</p> <p>East Renfrewshire Council have committed to periodic review of the RMP by ERC internal Audit and by participation in the Keeper of Scottish Records self-assessment program</p>	<p><b>East Renfrewshire Council Records Management Plan</b></p> <p><a href="https://www.eastrenfrewshire.gov.uk/records-management-policy">https://www.eastrenfrewshire.gov.uk/records-management-policy</a></p>	<p>What further development, if any, remains to be undertaken to bring this element into full compliance?</p>

RMP Element Description	East Renfrewshire Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p><b>Element 14: Shared Information</b></p> <p>The Keeper will expect an authority's RMP to reflect its procedures for sharing information. Authorities who share, or are planning to share, information must provide evidence that they have considered the implications of information sharing on good records management.</p> <p>Information sharing protocols act as high level statements of principles on sharing and associated issues, and provide general guidance to staff on sharing information or disclosing it to another party. It may therefore be necessary for an authority's RMP to include reference to information sharing protocols that govern how the authority will exchange information with others and make provision for appropriate governance procedures.</p> <p>Specifically the Keeper will expect assurances that an authority's information sharing procedures are clear about the purpose of record sharing which will normally be based on professional obligations. The Keeper will also expect to see a statement regarding the security of transfer of information, or records, between authorities whatever the format.</p> <p><a href="#">Read further explanation and guidance about element 14.</a></p>	<p>The IJB relies on East Renfrewshire Council to ensure that the systems, policies and procedures that govern its records are regularly assessed.</p> <p>The record management plan will be reviewed and updated through the Department Management Team. During the first year any gaps in this plan will be identified as issues arise and solutions agreed.</p> <p>East Renfrewshire Council have committed to periodic review of the RMP by ERC internal Audit and by participation in the Keeper of Scottish Records self-assessment program</p>	<p>An information sharing protocol has been agreed between NHS Greater Glasgow and Clyde Council and East Renfrewshire Council to enable the safe and effective sharing of information.</p> <p>( Hard Copy)</p>	<p>What further development, if any, remains to be undertaken to bring this element into full compliance?</p>



## **Overarching Memorandum of Understanding (MoU)**

**Between**

**East Renfrewshire Integration Joint Board**

**East Renfrewshire Council**

**And**

**Greater Glasgow Health Board**

**In relation to the IJB's Records Management Plan**

**DRAFT:**

**Dated 22nd October 2018**

**Ratification Date**

**Review Date**

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## Contents

<b>1</b>	<b>Parties, Scope and Purpose</b> .....	<b>1</b>
1.1	<i>Name and details of the parties who agree to share information</i> .....	1
1.2	<i>Introduction</i> .....	1
1.3	<i>Context</i> .....	2
1.4	<i>Purpose</i> .....	2
1.5	<i>Records Management</i> .....	2
1.5	<i>Parties' Responsibilities</i> .....	2
<b>2</b>	<b>Corporate Responsibility</b> .....	<b>3</b>
<b>3</b>	<b>Sign-off and responsibilities</b> .....	<b>3</b>
3.1	<i>Name of Accountable Officer(s), etc.</i> .....	3
3.2	<i>Leads for Records Management</i> .....	3
3.3	<i>Signatories</i> .....	4
3.4	<i>Sign off</i> .....	5

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## 1. PARTIES, SCOPE AND PURPOSE

### 1.1 Name and details of the parties

Legal name of parties	Short name of the party	Head Office address
East Renfrewshire Integration Joint Board	" <b>IJB</b> "	East Renfrewshire IJB, Eastwood Health and Care Centre, Drumby Crescent, Glasgow G76 7HN
East Renfrewshire Council	" <b>Council</b> "	East Renfrewshire Council, Eastwood Park, Rouken Glen Road, Giffnock G46 6UG
Greater Glasgow Health Board	" <b>Board</b> "	NHS Greater Glasgow and Clyde Corporate HQ J B Russell House Gartnavel Royal Hospital Campus 1055 Great Western Road GLASGOW G12 0XH

### 1.2 Introduction

The Public Bodies (Joint Working) (Scotland) Act 2014 was passed by the Scottish Parliament in February 2014 and came into force on 1<sup>st</sup> April 2016 and provides the framework for the integration of health and social care services in Scotland. Roles and responsibilities of IJBs, including the need for a Records Management Plan are set out here: <https://www.gov.scot/Publications/2015/09/8274/2>

East Renfrewshire IJB operates as a body corporate (a separate legal entity), acting independently of Greater Glasgow Health Board and East Renfrewshire Council.

Each of the Parties listed above are obliged to submit and maintain a Records Management Plan as defined in and in accordance with the Public Records (Scotland) Act 2011.

The Act requires named public authorities to submit a Records Management Plan (RMP) to be agreed by the Keeper of the Records of Scotland. Greater Glasgow Health Board and East Renfrewshire Council already have agreed Record Management Plans in place. IJBs were added to the Act's schedule by the Public Bodies (Joint Working) (Scotland) Act 2014 and this Memorandum of Understanding sets out how each of these RMPs relate to each other.

### 1.3 Context

The majority of records including employment, service user and internal policies and procedures will continue to be managed in the parent body organisations, i.e. East Renfrewshire Council (the Council) and Greater Glasgow Health Board (the Board) and as such will be covered by their respective record management plans.

The records covered by the IJB's records management plan constitute IJB business in terms of:

- IJB Meetings and related committees- agendas and papers, including Directions, Audit and Risk Committee and Strategic Planning
- IJB Strategies and Policies, including the Annual Report, Strategic Plan and Delivery Plan

### 1.4 Purpose

This Memorandum of Understanding sets out the agreement between the IJB and the Council and the Board on how the process of depositing, storing and accessing the IJB's records of enduring value will operate.

### 1.5 Records Management

The Parties acknowledge and agree that the responsibility for creating and maintaining the IJB's records will be delegated to the Council.

The IJB will follow the corporate Business Classification Scheme (BCS) adopted by the Council and the Council's BCS has been updated to include IJB records. This has been discussed and agreed as a sensible approach by the Board and the Council.

As such, the IJB's Records Management Plan evidences compliance via referencing the Council's Records Management Plan.

### 1.6 Parties' Responsibilities

All of the IJB's records will be subject to the policies and procedures of the Council. The nominated officers within the Council and the Board will have operational responsibility and are able to access these policies and procedures, as well as undergo appropriate training, e.g. Data Protection, Information Security, etc.

IJB records are part of the Committee Management System and as such have permanent retention status, which comply with statutory obligations set out under the Public Records (Scotland) Act 2011 and all other relevant legislation. The IJB's records are managed in accordance with the Council's Business Continuity and vital records arrangements. The Council's Audit Trail arrangements will ensure that records are retrievable and offer certainty around version control. The IJB will rely on the Council to ensure that the systems, policies and procedures that govern its records are being regularly assessed. An annual review will be undertaken by a group nominated by the IJB to ensure this is being done effectively.

## 2. CORPORATE RESPONSIBILITY

### 2.1 Corporate Responsibility

The IJB's Chief Officer has senior responsibility for all aspects of the IJB's Records Management and is also the IJB's "Senior Information Risk Owner (SIRO). The Chief Officer is content that all IJB Records will be managed by East Renfrewshire Council in line with Council policies and this is facilitated by this Memorandum of Understanding. In addition, the IJB's Chief Officer is satisfied that the Council and the Board has appropriate records management arrangements in place and that each has already been approved by the Keeper.

## 3. SIGN-OFF AND RESPONSIBILITIES

### 3.1 Name of Accountable Officer, etc.

The Accountable Officers for the Parties are:

Accountable Officer Name	Post title	Organisation
Mrs. Julie Murray	Chief Officer	East Renfrewshire Integration Joint Board
Mrs. Lorraine McMillan	Chief Executive	East Renfrewshire Council
Mrs Jean Grant	Chief Executive	Greater Glasgow Health Board

### 3.2 Leads for Records Management

The lead for Records Management at each of the Parties is:

Name	Post title	Organisation
Mr Stuart McMinigal	Business Support Manager	East Renfrewshire Health & Social Care Partnership
Mr Craig Geddes	Council Records Manager	East Renfrewshire Council
Mrs Isobel Brown	Information Governance Manager / Data Protection Officer	NHS Greater Glasgow and Clyde Corporate HQ J B Russell House Gartnavel Royal Hospital Campus 1055 Great Western Road GLASGOW, G12 0XH

### 3.3 Signatories

The following individuals (being authorised signatories) will sign this Memorandum of Understanding on behalf of the Parties:

Name of Party	East Renfrewshire Integration Joint Board	
Authorised signatories	Title /Name	Mrs Julie Murray
	Role	Chief Officer
Head Office address	Eastwood Health and Care Centre, Drumby Crescent, Clarkston, G76 7HN	

Name of Party	East Renfrewshire Council	
Authorised signatories	Title /Name	Mrs. Lorraine McMillan
	Role	Chief Executive
Head Office address	Eastwood Park, Rouken Glen Road, Giffnock, G46 6UG	

Name of Party	Greater Glasgow Health Board	
Authorised signatories	Title /Name	Mrs Jane Grant
	Role	Chief Executive
Head Office address	NHS Greater Glasgow and Clyde Corporate HQ J B Russell House, Gartnavel Royal Hospital Campus 1055 Great Western Road, Glasgow, G12 0XH	

3.1 Sign off

"We the undersigned agree to the details recorded in this Overarching Memorandum of Understanding; are satisfied that our representatives have carried out the necessary work to ensure that the IJB complies with the Public Records (Scotland) Act 2011. The IJB will submit and maintain a Records Management Plan to the Keeper. We agree to review this document on an annual basis.

Signature.....		Signature.....	
For and on behalf of East Renfrewshire Integration Joint Board		For and on behalf of East Renfrewshire Council	
Name	Mrs Julie Murray	Name	Mrs Lorraine McMillan
Date		Date	

Signature.....	
For and on behalf of Greater Glasgow Health	
Name	Mrs Jane Grant
Date	

**Review Date: November 2020**

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