

East Renfrewshire Integration Joint Board

Records Management Plan

Version 2 – July 2022

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.

Document Control Information

| Revision | Date | Revision Description |
|----------|------------|---|
| 1.0 | 22/10/2018 | Draft circulated for comment |
| 1.1 | 20/01/2019 | No changes, approved by IJB Jan 2019 |
| 2 | 10/10/2022 | Review – Elements 15 and 16 added in line with changes to Council's Records Management Plan. Links updated Approved by IJB Aug 2022 |

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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

Element 15: Third party information

Element 16: Guidance

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 27th June 2015.

From 1st 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, 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 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.

| RMP Element Description | East Renfrewshire Integration Joint Board (IJB) Compliance Statement | Evidence | Further Development |
|---|--|---|---|
| <p>Element 1: Senior management responsibility</p> <p>Section 1(2)(a)(i) of the Act specifically requires a RMP to identify the individual responsible for the management of the authority's public records. An authority's RMP <u>must</u> name and provide the job title of the senior manager who accepts overall responsibility for the RMP that has been submitted.</p> <p>It is vital that the RMP submitted by an authority has the approval and support of that authority's senior management team. Where an authority has already appointed a Senior Information Risk Owner, or similar person, they should consider making that person responsible for the records management programme. It is essential that the authority identifies and seeks the agreement of a senior post-holder to take overall responsibility for records management. That person is unlikely to have a day-to-day role in implementing the RMP, although they are not prohibited from doing so.</p> <p>As evidence, the RMP could include, for example, a covering letter signed by the senior post-holder. In this letter the responsible person named should indicate that they endorse the authority's record management policy (See Element 3).</p> <p>Read further explanation and guidance about element 1.</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 HSCP Management Team, which has strategic responsibility for the Health and Social Care Partnership.</p> | <p>Job Description and IJB appointment paper of Chief Officer</p> | <p>No further development required. The Keeper agrees that the IJB has identified an appropriate individual to this role.</p> |

| RMP Element Description | East Renfrewshire Integration Joint Board (IJB) Compliance Statement | Evidence | Further Development |
|--|--|---|---|
| <p>Element 2: Records Manager Responsibility</p> <p>Section 1(2) (a)(ii) of the Act specifically requires a RMP to identify the individual responsible for ensuring the authority complies with its plan. An authority's RMP must name and provide the job title of the person responsible for the day-to-day operation of activities described in the elements in the authority's RMP. This person should be the Keeper's initial point of contact for records management issues.</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>Read further explanation and guidance about element 2</p> | <p>The Operational Officer responsible for records management is:</p> <p>East Renfrewshire Council: Craig Geddes , Senior Information and Improvement Officer</p> <p>Responsibilities include oversight of:</p> <ul style="list-style-type: none"> ▪ Managing the IJB's records; ▪ Reviewing and implementing operational policies and procedures in line with the RMP; ▪ Ensuring relevant health and social care staff have records management training | <p>The MoU accompanying this document nominates this role within East Renfrewshire Council, as the lead with operational responsibility.</p> <p>Job description of Senior Information and Improvement Officer demonstrates that the named individual has the skills required and can access all IJB records.</p> <div style="text-align: center;">  <p>Senior Information and Improvement Off</p> </div> <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.</p> <div style="text-align: center;">  <p>RMP MoU_.pdf</p> </div> | <p>No further development required. The Keeper has agreed an appropriate individual has been appointed. A signed copy of the MoU was shared with the Keeper</p> |

| RMP Element Description | East Renfrewshire Integration Joint Board (IJB) Compliance Statement | Evidence | Further Development |
|--|---|---|--|
| <p>Element 3: Records Management Policy Statement</p> <p>The Keeper expects each authority's plan to include a records management policy statement. The policy statement should describe how the authority creates and manages authentic, reliable and useable records, capable of supporting business functions and activities for as long as they are required. The policy statement should be made available to all staff, at all levels in the authority. The statement will properly reflect the business functions of the public authority. The Keeper will expect authorities with a wide range of functions operating in a complex legislative environment to develop a fuller statement than a smaller Authority.</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>Read further explanation and guidance about element 3.</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"> • IJB Meetings - agendas and papers, including Directions • IJB Strategies and Policies, including the Annual Performance Report, Strategic Plan and Delivery Plan <p>All of this information is already in the public domain via the IJB's pages on East Renfrewshire Council's website</p> <p>https://www.eastrenfrewshire.gov.uk/integration-joint-board</p> | <p>East Renfrewshire Council Records Management Policy</p> <p>https://www.eastrenfrewshire.gov.uk/records-management-policy</p> | <p>The Keeper agrees that the IJB has adopted a suitable management policy</p> <p>The Council's Records Management policy will be reviewed every two years (next due 2023)</p> |

| RMP Element Description | East Renfrewshire Integration Joint Board (IJB) Compliance Statement | Evidence | Further Development |
|---|--|---|---|
| <p>Element 4: Business classification</p> <p>The Keeper expects an authority to have properly considered business classification mechanisms and its RMP should therefore reflect the 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>Read further explanation and guidance about element 4</p> | <p>As the IJB has only been in operation since 1st April 2016, the type and volume of record keeping specific to the IJB is 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>https://www.eastrenfrewshire.gov.uk/business-classification-scheme</p> | <p>Ongoing reassessment involving department information asset owners will ensure that it's kept accurate and up-to-date.</p> |

| RMP Element Description | East Renfrewshire Integration Joint Board (IJB) Compliance Statement | Evidence | Further Development |
|---|---|---|---------------------|
| <p>Element 5: Retention schedules</p> <p>Section 1(2) (b)(iii) of the Act specifically requires a RMP to include provision about the archiving and destruction or other disposal of the authority's public records.</p> <p>An authority's RMP 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"> ▪ to ensure records are kept for as long as they are needed and then disposed of appropriately ▪ to ensure all legitimate considerations and future uses are considered in reaching the final decision. ▪ to provide clarity as to which records are still held by an authority and which have been deliberately destroyed. <p>"Disposal" in this context does not necessarily mean destruction. It includes any action taken at the agreed disposal or review date including migration to another format and transfer to a permanent archive.</p> <p>A retention schedule is an important tool for proper records management. Authorities who do not yet have a full retention schedule in place should show evidence that the importance of such a schedule is acknowledged by the senior person responsible for records management in an authority (see element 1). This might be done as part of the policy document (element 3). It should also be made clear that the authority has a retention schedule in development.</p> <p>An authority's RMP must demonstrate the principle that retention rules are consistently applied across all of an authority's record systems.</p> <p>Read further explanation and guidance about element 5.</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.</p> <p>Schedule 18 of the retention scheme relates specifically to the Integration Joint Board</p> | <p>East Renfrewshire Council Retention Schedule Document</p> <p>https://www.eastrenfrewshire.gov.uk/retention-schedule</p> | <p>As above</p> |

| RMP Element Description | East Renfrewshire Integration Joint Board (IJB) Compliance Statement | Evidence | Further Development |
|---|--|---|--|
| <p>Element 6: Destruction arrangements</p> <p>Section 1(2) (b)(iii) of the Act specifically requires a RMP to include provision about the archiving and destruction, or other disposal, of an authority's public records.</p> <p>An authority's RMP must demonstrate that proper destruction arrangements are in place.</p> <p>A retention schedule, on its own, will not be considered adequate proof of disposal for the Keeper to agree a RMP. It must be linked with details of an authority's destruction arrangements. These should demonstrate security precautions appropriate to the sensitivity of the records. Disposal arrangements must also ensure that all copies of a record – wherever stored – are identified and destroyed.</p> <p>Read further explanation and guidance about element 6.</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>https://www.eastrenfrewshire.gov.uk/destruction-arrangements</p> | <p>Continue to monitor destruction arrangements as new records systems are developed</p> |

| RMP Element Description | East Renfrewshire Integration Joint Board (IJB) Compliance Statement | Evidence | Further Development |
|--|--|--|--|
| <p>Element 7: Archiving and transfer arrangements</p> <p>Section 1(2)(b)(iii) of the Act specifically requires a RMP to make provision about the archiving and destruction, or other disposal, of an authority's public records.</p> <p>An authority's RMP 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.</p> <p>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>Read further explanation and guidance about element 7.</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 location</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>https://www.eastrenfrewshire.gov.uk/archiving-and-transfer-arrangements</p> | <p>The provision for physical archives continues to be under review, and policies and provision for electronic archiving will need to be developed. An Archives Service Standards document is being drafted.</p> |

| RMP Element Description | East Renfrewshire Integration Joint Board (IJB) Compliance Statement | Evidence | Further Development |
|---|---|--|--|
| <p>Element 8: Information Security</p> <p>Section 1(2) (b)(ii) of the Act specifically requires a RMP to make provision about the archiving and destruction or other disposal of the authority's public records.</p> <p>An authority's RMP <u>must</u> make provision for the proper level of security for its public records. 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>Read further explanation and guidance about element 8.</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>NHS Greater Glasgow and Clyde Information Security Policy</p> <p>http://library.nhsggc.org.uk/mediaAssets/library/InformationGovernancePolicy09Jul02.pdf</p> <p>or East Renfrewshire Council Information Security Policy</p> <p>https://www.eastrenfrewshire.gov.uk/information-security</p> | <p>East Renfrewshire Council Information Security Policy</p> <p>https://www.eastrenfrewshire.gov.uk/information-security</p> <p>East Renfrewshire Information Security Group Remit:</p> | <p>A new Information Asset Register system, which will enable the linking of security classifications with its business classification scheme is being introduced. Information securities policies and related assessments are instigated by the ERC Information Security and Digital Risk Officer</p> |

| RMP Element Description | East Renfrewshire Integration Joint Board (IJB) Compliance Statement | Evidence | Further Development |
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| <p>Element 9: Data protection</p> <p>The Keeper will expect an authority's RMP to indicate compliance with its data protection obligations. This might be a high level statement of public responsibility and fair processing.</p> <p>If an authority holds and process information about stakeholders, clients, employees or suppliers, it is legally obliged to protect that information. Under the Data Protection Act, an authority must only collect information needed for a specific business purpose, it must keep it secure and ensure it remains relevant and up to date. The authority <u>must</u> also only hold as much information as is needed for business purposes and only for as long as it is needed. The person who is the subject of the information <u>must</u> be afforded access to it on request.</p> <p>Read further explanation and guidance about element 9.</p> | <p>The Information Commissioner has confirmed that the IJB can be a data controller albeit that it will not hold any personal records of service users/patients.</p> <p>Any personal data held by the IJB is therefore limited and would be handled in line with East Renfrewshire Council's data protection policy.</p> <p>The IJB is registered as a body which will be subject to Freedom of Information applies to the IJB and a local policy has been established albeit that most requests will be addressed directly by the parent bodies.</p> <p>Legislation changed on 25/05/18 which increased the rights of individuals and increase fines for data breaches.</p> <p>The IJB has its own complaints policy.</p> <p>IJB records are properly managed for the purposes of Data Protection</p> | <p>East Renfrewshire IJB is not registered as a Data Controller on the ICO website</p> <p>ERC Data Protection Policy</p> <p>Privacy Policy</p> <p>IJB Complaints Policy</p> <p>ERC Complaints Policy</p> <p>IJB FOI Policy and Publication scheme</p> <p>Ongoing training is provided via NHS learnpro and ERC online training modules.</p> | <p>The Council's Data Protection policy will be reviewed every 2 years or to reflect changes in staffing as appropriate</p> |

| RMP Element Description | East Renfrewshire Integration Joint Board (IJB) Compliance Statement | Evidence | Further Development |
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| <p>Element 10: Business continuity and vital records</p> <p>The Keeper will expect an authority's RMP to indicate arrangements in support of records vital to business continuity. Certain records held by authorities are vital to their function. These might include insurance details, current contract information, master personnel files, case files, etc. The RMP will support reasonable procedures for these records to be accessible in the event of an emergency affecting their premises or systems.</p> <p>Authorities should therefore have appropriate business continuity plans ensuring that the critical business activities referred to in their vital records will be able to continue in the event of a disaster. How each authority does this is for them to determine in light of their business needs, but the plan should point to it.</p> <p>Read further explanation and guidance about element 10.</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.</p> <p>The IJB's records will be subject to the policies and procedures of the partner body in relation to business continuity.</p> <p>The 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>https://www.eastrenfrewshire.gov.uk/business-continuity-and-vital-records</p> | <p>The Business Continuity Policy is due to be refreshed once the Covid-19 outbreak and associated lockdown measures have passed.</p> <p>Vital records within the archives and records store will be defined as part of a records store disaster plan</p> |

| RMP Element Description | East Renfrewshire Integration Joint Board (IJB) Compliance Statement | Evidence | Further Development |
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| <p>Element 11: Audit trail</p> <p>The Keeper will expect an authority's RMP to provide evidence that the authority maintains a complete and accurate representation of all changes that occur in relation to a particular record. For the purpose of this plan 'changes' can be taken to include movement of a record even if the information content is unaffected. Audit trail information must be kept for at least as long as the record to which it relates.</p> <p>This audit trail can be held separately from or as an integral part of the record. It may be generated automatically, or it may be created manually.</p> <p>Read further explanation and guidance about element 11</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>No further development required.</p> |

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| <p>Element 12: Competency framework for records management staff</p> <p>The Keeper will expect an authority's RMP to detail a competency framework for person(s) designated as responsible for the day-to-day operation of activities described in the elements in the authority's RMP. It is important that authorities understand that records management is best implemented by a person or persons possessing the relevant skills.</p> <p>A competency framework outlining what the authority considers are the vital skills and experiences needed to carry out the task is an important part of any records management system. If the authority appoints an existing non- records professional member of staff to undertake this task, the framework will provide the beginnings of a training programme for that person.</p> <p>The individual carrying out day-to-day records management for an authority might not work for that authority directly. It is possible that the records management function is undertaken by a separate legal entity set up to provide functions on behalf of the authority, for example an arm's length body or a contractor. Under these circumstances the authority must satisfy itself that the supplier supports and continues to provide a robust records management service to the authority.</p> <p>Read further explanation and guidance about element 12.</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>Our Senior Information and Improvement Officer can offer advice on records issues, and guidance on data protection and information security is available from the Business Operations & Partnerships Department.</p> <p>A new records management competencies and training framework has been developed</p> | <p>East Renfrewshire Council Competency Framework</p> <p>https://www.eastrenfrewshire.gov.uk/records-management-training</p> | <p>Online training module will be refreshed and further role-based corporate and departmental records management training will be developed as part of the implementation of the Council's records management competencies and training framework</p> |

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| <p>Element 13: Assessment and review</p> <p>Section 1(5) (i)(a) of the Act says that an authority must keep its RMP under review.</p> <p>An authority's RMP <u>must</u> describe the procedures in place to regularly review it in the future.</p> <p>It is important that an authority's RMP is regularly reviewed to ensure that it remains fit for purpose. It is therefore vital that a mechanism exists for this to happen automatically as part of an authority's internal records management processes.</p> <p>A statement to support the authority's commitment to keep its RMP under review must appear in the RMP detailing how it will accomplish this task.</p> <p>Read further explanation and guidance about element 13.</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 HSCP 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>East Renfrewshire Council Records Management Policy</p> <p>https://www.eastrenfrewshire.gov.uk/records-management-policy</p> | <p>The Council's Records Management Plan has defined review dates and policy and guidance will continue to be assessed and reviewed going forward</p> |

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| <p>Element 14: Shared information</p> <p>The Keeper will expect an authority's RMP to reflect its procedures for sharing information. Authorities who share, or are planning to share, information must provide evidence that they have considered the implications of information sharing on good records management.</p> <p>Information sharing protocols act as high level statements of principles on sharing and associated issues, and provide general guidance to staff on sharing information or disclosing it to another party. It may therefore be necessary for an authority's RMP to include reference to information sharing protocols that govern how the authority will exchange information with others and make provision for appropriate governance procedures.</p> <p>Specifically the Keeper will expect assurances that an authority's information sharing procedures are clear about the purpose of record sharing which will normally be based on professional obligations. The Keeper will also expect to see a statement regarding the security of transfer of information, or records, between authorities whatever the format.</p> <p>Read further explanation and guidance about element 14.</p> | <p>As part of its function the IJB must utilise the records of other partners and therefore information sharing is a key part of its business therefore an information sharing protocol has been agreed between NHS Greater Glasgow and Clyde Council and East Renfrewshire Council</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>Arrangements are place to ensure sharing agreements are reviewed. The Council are implementing an Information Asset Register which will allow for greater clarity and control in relation to the responsibility for records and how they can be shared.</p> |

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| <p>Element 15: Third Party Records</p> <p>Section 3 of the Act describes the meaning of ‘public records’ for the purposes of the Act. It says that public records in relation to a named authority means records created by or on behalf of the authority in carrying out its functions. This is extended to records created by or on behalf of a contractor carrying out the authority’s functions and includes records that have come into the possession of the authority or contractor in carrying out the authority’s functions. Records created or held by a third party contractor that are not done so in relation to that contractor carrying out the function of the public authority are not public records under the Act.</p> <p>An authority’s plan must include reference as to what public records are being created and held by a third party carrying out a function of the authority and how these are being managed to the satisfaction of the authority. This does not mean the authority must impose its own arrangements on the third party.</p> <p>Authorities should take a risk-based approach to the arrangements it puts in place with third parties to ensure that these are relevant and proportionate to the public records that fall within the scope of each contract type. Records management requirements, and evidence of assurance that prospective contractors will be able to meet these, should be included in the procurement exercise.</p> <p>An authority will wish to ensure the scope of its proposed arrangements include sub-contractors. It will further wish to ensure that arrangements are in place to allow it to meet statutory obligations under other information legislation, for example, to FOI(S)A and data protection legislation (see Element 9). There may be other regulatory obligations that an authority will wish to consider in relation to the function being carried out by the third party.</p> | <p>Public records created by third parties are covered within the scope of all relevant components of our Records Management Plan including the Records Management Policy, Corporate Records Management Procedures and the integrated Business Classification Scheme and Record Retention Schedule.</p> <p>As contracted services are procured and commissioned directly by NHS Greater Glasgow and Clyde or East Renfrewshire Council there are no IJB records which have been created or held by third parties.</p> | <p>As statutory functions carried out by third parties are commissioned by either ERC or NHSGGC</p> <p>https://www.eastrenfrewshire.gov.uk/public-records-and-third-parties</p> | <p>No further development identified</p> |

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| <p>Element 16: Guidance</p> <p>This is an additional element which has been added to ER IJB RMP</p> <p><i>This is not a statutory element</i></p> | <p>This new area comprises the following guidance notes which are either new or have been substantially refreshed and revised from previous versions (as at 2021)</p> <ul style="list-style-type: none"> ▪ Managing your files ▪ Email Guidance ▪ Version Control ▪ Using the Records Store ▪ Records Store Procedures ▪ Scanning Guidelines ▪ Meta-data guidance ▪ Taking care of our digital records ▪ Redaction Guidance | <p>https://www.eastrenfrewshire.gov.uk/records-management-guidance</p> | <p>Policy and guidance will continue to be assessed and reviewed in line with review dates identified as part of the Council's RMP</p> |