

Integration Joint Board
14th February 2019

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| Subject: | North Ayrshire Integration Joint Board - Records Management Plan |
| Purpose: | North Ayrshire Integration Joint Board (NAIJB) approves the NAIJB Records Management Plan (RMP) |
| Recommendation: | The Integration Joint Board is asked to: 1. Note the report 2. Approve the North Ayrshire Integration Joint Board RMP |

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| NAIJB | North Ayrshire Integration Joint Board |
| RMP | Records Management Plan |

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| 1. | EXECUTIVE SUMMARY |
| 1.1 | The Public Records (Scotland) Act requires North Ayrshire Integration Joint Board (NAIJB) to produce and follow a Records Management Plan (RMP). |
| 1.2 | <p>The plan covers 14 elements which the Board will implement:</p> <ol style="list-style-type: none"> 1. Senior Management responsibility 2. Records Manager responsibility 3. Records Management policy statement 4. Business Classification 5. Retention Schedules 6. Destruction arrangements 7. Archiving and transfer arrangements 8. Information Security 9. Data Protection 10. Business continuity and vital records 11. Audit trail 12. Competency framework for records management staff 13. Assessment and review 14. Shared Information <p>Compliance statements and evidence are contained within the RMP.</p> |
| 1.3 | <p>Advice from the Keeper of Scotland indicates that where IJB records sit within one of the partner agencies (either NHS or Local Authority) then the RMP evidence and policies and procedures of that partner should be adopted for the IJB RMP.</p> <p>All NAIJB records sit within North Ayrshire Council systems and are managed in accordance with North Ayrshire Council policies and procedures. Ms Lauren Lewis, Information Management Officer is the designated Officer of the Council who has operational responsibility for North Ayrshire Council and NAIJB records management.</p> |

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| 1.4 | The Senior Officer of NAIJB and the Chief Executive of North Ayrshire Council have endorsed the NAIJB RMP. |
| 3. | PROPOSALS |
| 3.1 | NAIJB to approve the RMP for the Integration Joint Board. |
| 3.2 | <u>Anticipated Outcomes</u> |
| | N/A |
| 3.3 | <u>Measuring Impact</u> |
| | N/A |
| 4. | IMPLICATIONS |

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| Financial: | None |
| Human Resources: | None |
| Legal: | The Public Records (Scotland) Act 2011 places a number of duties on the Integration Joint Board. Where authorities fail to meet their obligations under the Act, the Keeper has powers to undertake records management reviews and issue action notices for improvement. |
| Equality: | None |
| Children and Young People | None |
| Environmental & Sustainability: | None |
| Key Priorities: | Consider the impacts on key priorities and plans. |
| Risk Implications: | Failure to comply with the Public Records (Scotland) Act 2011 presents a legal and reputational risk to the Integration Joint Board |
| Community Benefits: | N/A |

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| Direction Required to Council, Health Board or Both | Direction to :- | |
| | 1. No Direction Required | |
| | 2. North Ayrshire Council | |
| | 3. NHS Ayrshire & Arran | |
| | 4. North Ayrshire Council and NHS Ayrshire & Arran | |

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| 5. | CONSULTATION |
| 5.1 | The Keeper has hosted 'surgeries' during 2018 for representatives of IJBs with a responsibility for developing RMPs. North Ayrshire IJB have been represented at these surgeries. In addition consultation has taken place with Information Governance representatives from both NHS Ayrshire & Arran and North Ayrshire Council. |

For more information please contact Julie Davis, Principal Manager Business Administration on 01294 317766 or jdavis@north-ayrshire.gcsx.gov.uk

North Ayrshire Integration Joint Board Records Management Plan

Information and Records Management
[January 2019]

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Records Management Plan

Summary

North Ayrshire Integration Joint Board is fully committed to compliance with the requirements of the Public Records (Scotland) Act, which came into force on the 1st January 2013. North Ayrshire Integration Joint Board will therefore follow procedures that aim to ensure that all of its officers, employees of constituent authorities supporting its work, contractors, agents, consultants and other trusted third parties who create public records on behalf of the authority, or manage public records held by the authority, are fully aware of and abide by this plan's arrangements.

About the Public Records (Scotland) Act 2011

The Public Records (Scotland) Act 2011 (the Act) came into force on the 1st January 2013, and requires named public authorities to submit a Records Management Plan (RMP) to be agreed by the Keeper of the Records of Scotland. Integration Joint Boards were added to the Act's schedule by the Public Bodies (Joint Working) (Scotland) Act 2014. This document is the Records Management Plan of North Ayrshire Integration Joint Board.

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 North Ayrshire Integration Joint Board

North Ayrshire Integration Joint Board (the Board) is responsible for the planning and oversight of delivery of health and social care integrated functions for North Ayrshire.

The Board's Integration Scheme sets out the functions which are delegated by NHS Ayrshire & Arran and North Ayrshire Council to the IJB.

The Board operates as a body corporate (a separate legal entity), acting independently of NHS Ayrshire & Arran and North Ayrshire Council. The Board consists of six voting members appointed in equal number by the NHS Ayrshire & Arran and North Ayrshire Council, with a number of representative members who are drawn from the third sector, independent sector, staff, carers and service users. The Board is advised by a number of professionals including the Chief Officer, Medical Director, Nurse Director and Chief Social Work Officer.

The key functions of the Board are to:

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

Information underpins the Board's over-arching strategic objective and helps it meet its strategic outcomes. It's 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 Board 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 Element Description | North Ayrshire Integration Joint Board (IJB) Compliance Statement | Evidence | Further Development |
|---|--|---|---|
| <p>Element 1: Senior management responsibility:</p> <p>Section 1(2)(a)(i) of the Act specifically requires a RMP to identify the individual responsible for the management of the authority's public records. An authority's RMP <u>must</u> name and provide the job title of the senior manager who accepts overall responsibility for the RMP that has been submitted.</p> <p>It is vital that the RMP submitted by an authority has the approval and support of that authority's senior management team. Where an authority has already appointed a Senior Information Risk Owner, or similar person, they should consider making that person responsible for the records management programme. It is essential that the authority identifies and seeks the agreement of a senior post-holder to take overall responsibility for records management. That person is unlikely to have a day-to-day role in implementing the RMP, although they are not prohibited from doing so.</p> <p>As evidence, the RMP could include, for example, a covering letter signed by the senior post-holder. In this letter the responsible person named should indicate that they endorse the authority's record management policy (See Element 3).</p> <p>Read further explanation and guidance about element 1 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement1.asp</p> | <p>The Chief Officer, Stephen Brown has senior responsibility for all aspects of the Board's Records Management, and is the corporate owner of this document.</p> <p>The Chief Officer is also the Board's Senior Information Risk Owner (SIRO).</p> <p>All records relating to North Ayrshire IJB are held on North Ayrshire Council systems</p> | <p>Evidence attached:</p> <p>Job profile and objectives of CO (Director Health & Social Care Partnership)</p> <p>Covering letter signed by CO endorsing the authority's Record Management Policy</p> <p>IJB Report approving appointment of IJB Chief Officer</p> | <p>What further development, if any, remains to be undertaken to bring this element into full compliance?</p> |

| RMP Element Description | North Ayrshire Integration Joint Board (IJB) Compliance Statement | Evidence | Further Development |
|--|---|--|---|
| <p>Element 2: Records manager responsibility:</p> <p>Section 1(2) (a)(ii) of the Act specifically requires a RMP to identify the individual responsible for ensuring the authority complies with its plan. An authority's RMP <u>must</u> name and provide the job title of the person responsible for the day-to-day operation of activities described in the elements in the authority's RMP. This person should be the Keeper's initial point of contact for records management issues. It is essential that an individual has overall day-to-day responsibility for the <u>implementation</u> of an authority's RMP. There may already be a designated person who carries out this role. If not, the authority will need to make an appointment. As with element 1 above, the RMP must name an individual rather than simply a job title. It should be noted that staff changes will not invalidate any submitted plan provided that the all records management responsibilities are transferred to the incoming post holder and relevant training is undertaken. This individual might not work directly for the scheduled authority. It is possible that an authority may contract out their records management service. If this is the case an authority may not be in a position to provide the name of those responsible for the day-to-day operation of this element. The authority must give details of the arrangements in place and name the body appointed to carry out the records management function on its behalf. It may be the case that an authority's records management programme has been developed by a third party. It is the person operating the programme on a day-to-day basis whose name should be submitted.</p> <p>Read further explanation and guidance about element 2 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement2.asp</p> | <p>The records of North Ayrshire IJB sit within North Ayrshire Council systems and are subject to the Council's policies and procedures. The person with corporate responsibility for records management is :</p> <p>Lauren Lewis, Information Management Officer, North Ayrshire Council, Cunninghame House, Friarscroft, Irvine KA12 8EE</p> <p>Ms Lewis is able to access and manage IJB information.</p> | <p>Evidence Previously submitted with North Ayrshire Council Records Management Plan:</p> <ul style="list-style-type: none"> • Role Profile – Info Management Officer <p>Evidence attached:</p> <ul style="list-style-type: none"> • Letter of confirmation from IJB Chief Officer • Letter of confirmation from North Ayrshire Council | <p>What further development, if any, remains to be undertaken to bring this element into full compliance?</p> |

| RMP Element Description | North Ayrshire Integration Joint Board (IJB) Compliance Statement | Evidence | Further Development |
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| <p>Element 3: Records management policy statement:</p> <p>The Keeper expects each authority's plan to include a records management policy statement. The policy statement should describe how the authority creates and manages authentic, reliable and useable records, capable of supporting business functions and activities for as long as they are required. The policy statement should be made available to all staff, at all levels in the authority. The statement will properly reflect the business functions of the public authority. The Keeper will expect authorities with a wide range of functions operating in a complex legislative environment to develop a fuller statement than a smaller authority. The records management statement should define the legislative, regulatory and best practice framework, within which the authority operates and give an overview of the records management processes and systems within the authority and describe how these support the authority in carrying out its business effectively. For electronic records the statement should describe how metadata is created and maintained. It should be clear that the authority understands what is required to operate an effective records management system which embraces records in all formats.</p> <p>The records management statement should include a description of the mechanism for records management issues being disseminated through the authority and confirmation that regular reporting on these issues is made to the main governance bodies. The statement should have senior management approval and evidence, such as a minute of the management board recording its approval, submitted to the Keeper. The other elements in the RMP, listed below, will help provide the Keeper with evidence that the authority is fulfilling its policy.</p> <p>Read further explanation and guidance about element 3 – http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement3.asp</p> | <p>The Board has adopted and is fully committed to the Records Management Policy of North Ayrshire Council.</p> <p>All Officers who have access to IJB records are governed by North Ayrshire Council's policies and procedures relating to records management</p> | <p>Evidence Previously submitted with North Ayrshire Council Records Management Plan:</p> <ul style="list-style-type: none"> • Information & Records Management Policy (v5.0 Feb 2018) • Records Management Manual (v3.0 June 2018) • Information Management Strategy (v2 Dec 2015) • Information Governance Procurement Framework <p>Evidence attached</p> <ul style="list-style-type: none"> • IJB Report for February 2019 Committee • Letter of confirmation from North Ayrshire Council | <p>What further development, if any, remains to be undertaken to bring this element into full compliance?</p> |

| RMP Element Description | North Ayrshire Integration Joint Board (IJB) Compliance Statement | Evidence | Further Development |
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| <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.</p> <p>A business classification scheme allows an authority to map its functions and provides a structure for operating a disposal schedule effectively.</p> <p>Some authorities will have completed this exercise already, but others may not. Creating the first business classification scheme can be a time-consuming process, particularly if an authority is complex, as it involves an information audit to be undertaken. It will necessarily involve the cooperation and collaboration of several colleagues and management within the authority, but without it the authority cannot show that it has a full understanding or effective control of the information it keeps.</p> <p>Although each authority is managed uniquely there is an opportunity for colleagues, particularly within the same sector, to share knowledge and experience to prevent duplication of effort.</p> <p>All of the records an authority creates should be managed within a single business classification scheme, even if it is using more than one record system to manage its records. An authority will need to demonstrate that its business classification scheme can be applied to the record systems which it operates.</p> <p>Read further explanation and guidance about element 4 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement4.asp</p> | <p>The Board's records will be wholly created and managed on North Ayrshire Council systems.</p> <p>The Council has a comprehensive and in-depth Information Asset Register (IAR) which is based on the Local Government Classification Scheme.</p> <p>The Council intends to use the existing IAR to inform the file plan structure when the authority begins the implementation of the Office 365 and SharePoint project. This project aims to deliver this new solution to all Council staff by end 2019.</p> | <p>Letter of confirmation from North Ayrshire Council</p> | <p>What further development, if any, remains to be undertaken to bring this element into full compliance?</p> |

| RMP Element Description | North Ayrshire Integration Joint Board (IJB) Compliance Statement | Evidence | Further Development |
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| <p>Element 5: Retention schedules</p> <p>Section 1(2) (b)(iii) of the Act specifically requires a RMP to include provision about the archiving and destruction or other disposal of the authority's public records.</p> <p>An authority's RMP <u>must</u> demonstrate the existence of and adherence to corporate records retention procedures. The procedures should incorporate retention schedules and should detail the procedures that the authority follows to ensure records are routinely assigned disposal dates, that they are subsequently destroyed by a secure mechanism (see element 6) at the appropriate time, or preserved permanently by transfer to an approved repository or digital preservation programme (See element 7).</p> <p>The principal reasons for creating retention schedules are:</p> <ul style="list-style-type: none"> • to ensure records are kept for as long as they are needed and then disposed of appropriately • to ensure all legitimate considerations and future uses are considered in reaching the final decision. • to provide clarity as to which records are still held by an authority and which have been deliberately destroyed. <p>"Disposal" in this context does not necessarily mean destruction. It includes any action taken at the agreed disposal or review date including migration to another format and transfer to a permanent archive.</p> <p>A retention schedule is an important tool for proper records management. Authorities who do not yet have a full retention schedule in place should show evidence that the importance of such a schedule is acknowledged by the senior person responsible for records management in an authority (see element 1). This might be done as part of the policy document (element 3). It should also be made clear that the authority has a retention schedule in development.</p> <p>An authority's RMP <u>must</u> demonstrate the principle that retention rules are consistently applied across all of an authority's record systems.</p> <p>Read further explanation and guidance about element 5_- http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement5.asp</p> | <p>IJB records are maintained in line with North Ayrshire Council Retention and Disposal Schedules, which are based on the Retention and Disposal Schedules produced by the Scottish Council on Archives.</p> | <p>Evidence Previously submitted with North Ayrshire Council Records Management Plan:</p> <ul style="list-style-type: none"> • NAC Retention Schedule <p>Evidence attached:</p> <ul style="list-style-type: none"> • Letter of confirmation from North Ayrshire Council | <p>What further development, if any, remains to be undertaken to bring this element into full compliance?</p> |

| RMP Element Description | [Name] Integration Joint Board (IJB) Compliance Statement | Evidence | Further Development |
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| <p>Element 6: Destruction arrangements</p> <p>Section 1(2) (b)(iii) of the Act specifically requires a RMP to include provision about the archiving and destruction, or other disposal, of an authority's public records.</p> <p>An authority's RMP <u>must</u> demonstrate that proper destruction arrangements are in place.</p> <p>A retention schedule, on its own, will not be considered adequate proof of disposal for the Keeper to agree a RMP. It must be linked with details of an authority's destruction arrangements. These should demonstrate security precautions appropriate to the sensitivity of the records. Disposal arrangements must also ensure that all copies of a record – wherever stored – are identified and destroyed.</p> <p>Read further explanation and guidance about element 6 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement6.asp</p> | <p>Destruction of Board records, in all formats, will be undertaken in line with North Ayrshire Council policies and procedures.</p> <p>The Council, in partnership with East and South Ayrshire Councils, maintains a secure hardware destruction contract which conforms to the relevant legislative requirements</p> | <p>Evidence Previously submitted with North Ayrshire Council Records Management Plan:</p> <ul style="list-style-type: none"> • Records Management manual • Information Classification Guidelines • Confidential Waste Guidelines for Services • ICT Disposal Guidelines • Back up procedure for electronic records <p>Evidence attached:</p> <p>Letter of confirmation from North Ayrshire Council</p> | <p>What further development, if any, remains to be undertaken to bring this element into full compliance</p> |

| RMP Element Description | North Ayrshire Integration Joint Board (IJB) Compliance Statement | Evidence | Further Development |
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| <p>Element 7: Archiving and transfer arrangements</p> <p>Section 1(2)(b)(iii) of the Act specifically requires a RMP to make provision about the archiving and destruction, or other disposal, of an authority's public records.</p> <p>An authority's RMP <u>must</u> detail its archiving and transfer arrangements and ensure that records of enduring value are deposited in an appropriate archive repository. The RMP will detail how custody of the records will transfer from the operational side of the authority to either an in-house archive, if that facility exists, or another suitable repository, which <u>must</u> be named. The person responsible for the archive should also be cited.</p> <p>Some records continue to have value beyond their active business use and may be selected for permanent preservation. The authority's RMP <u>must</u> show that it has a mechanism in place for dealing with records identified as being suitable for permanent preservation. This mechanism will be informed by the authority's retention schedule which should identify records of enduring corporate and legal value. An authority should also consider how records of historical, cultural and research value will be identified if this has not already been done in the retention schedule. The format/media in which they are to be permanently maintained should be noted as this will determine the appropriate management regime.</p> <p>Read further explanation and guidance about element 7- http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement7.asp</p> | <p>All IJB records of enduring value will be archived/transferred in line with North Ayrshire Council policy.</p> | <p>Evidence attached:</p> <p>Letter of confirmation from North Ayrshire Council</p> | <p>What further development, if any, remains to be undertaken to bring this element into full compliance</p> |

| RMP Element Description | North Ayrshire Integration Joint Board (IJB) Compliance Statement | Evidence | Further Development |
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| <p>Element 8: Information Security</p> <p>Section 1(2) (b)(ii) of the Act specifically requires a RMP to make provision about the archiving and destruction or other disposal of the authority's public records.</p> <p>An authority's RMP <u>must</u> make provision for the proper level of security for its public records.</p> <p>All public authorities produce records that are sensitive. An authority's RMP <u>must</u> therefore include evidence that the authority has procedures in place to adequately protect its records. Information security procedures would normally acknowledge data protection and freedom of information obligations as well as any specific legislation or regulatory framework that may apply to the retention and security of records.</p> <p>The security procedures <u>must</u> put in place adequate controls 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>All systems, devices, information sharing platforms, etc. that the IJB relies upon are owned and maintained by North Ayrshire Council.</p> | <p>Evidence Previously submitted with North Ayrshire Council Records Management Plan:</p> <ul style="list-style-type: none"> • Information Assurance Policy • IT & Cyber Security Policy • Third Party Access to Council Resources Guidelines • Guidelines for Handling Information and Data • Guidelines for Reporting IT and Cyber Security Incidents • Loss of IT Equipment Guidelines <p>Evidence attached:</p> <p>Letter of confirmation from North Ayrshire Council</p> | <p>What further development, if any, remains to be undertaken to bring this element into full compliance</p> |

| RMP Element Description | North Ayrshire 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 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement9.asp</p> | <p>The Council employs a full time Data Protection Officer. This role meets the requirements of the General Data Protection Regulation (GDPR). All Data Protection policy and guideline documents have been revised to reflect the introduction of the GDPR and the Data Protection Act 2018. These include: Data Protection Policy, Privacy and fair processing of personal data, Guidance on handling subject access requests, Data breach reporting and management procedures, Data protection impact assessment information and guidance. The Council's Privacy Notice has also been updated.</p> <p>The Board members of the IJB have undertaken specific induction training including Data Protection</p> | <p>Evidence Previously submitted with North Ayrshire Council Records Management Plan:</p> <ul style="list-style-type: none"> • Privacy and Fair Processing of Personal Data (v 1 March 2018) • Data Protection Policy (v2.2 May 2018) • Guidance on Handling Subject Access Requests (v.1.2 May 2018) • Data Breach Reporting and Management Procedures (v1 May 2018) • Data Protection Impact Assessment & Guidance (v2 April 2018) | <p>What further development, if any, remains to be undertaken to bring this element into full compliance</p> |

| RMP Element Description | North Ayrshire 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 - <u>http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement10.asp</u></p> | <p>NAIJB records are subject to the policies and procedures of North Ayrshire Council in relation to business continuity.</p> | <p>Evidence attached:</p> <p>Letter of confirmation from North Ayrshire Council</p> | <p>What further development, if any, remains to be undertaken to bring this element into full compliance</p> |

| RMP Element Description | North Ayrshire 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 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement11.asp</p> | <p>The records of NAIJB will be wholly covered by the audit arrangements of North Ayrshire Council.</p> | <p>Evidence Previously submitted with North Ayrshire Council Records Management Plan:</p> <ul style="list-style-type: none"> • Document Control Guidelines (v2.0 May 2018) • File Naming Convention Guidelines (v10 May 2018) <p>Evidence attached:</p> <p>Letter of confirmation from North Ayrshire Council</p> | <p>What further development, if any, remains to be undertaken to bring this element into full compliance</p> |

| RMP Element Description | North Ayrshire Integration Joint Board (IJB) Compliance Statement | Evidence | Further Development |
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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>As part of the GDPR project in North Ayrshire Council, a comprehensive training programme was rolled out across all staff and Elected Members.</p> <p>The information Management Officer has corporate responsibility for records management and is a current and active member of the Information and Records Management Society (IRMS). She will be undertaking relevant training courses and qualifications to further develop</p> | <p>Evidence attached:</p> <p>Letter of confirmation from North Ayrshire Council</p> | <p>What further development, if any, remains to be undertaken to bring this element into full compliance</p> |

| RMP Element Description | North Ayrshire Integration Joint Board (IJB) Compliance Statement | Evidence | Further Development |
|--|--|---|--|
| <p>Element 13: Assessment and review</p> <p>Section 1(5) (i)(a) of the Act says that an authority must keep its RMP under review.</p> <p>An authority's RMP <u>must</u> describe the procedures in place to regularly review it in the future.</p> <p>It is important that an authority's RMP is regularly reviewed to ensure that it remains fit for purpose. It is therefore vital that a mechanism exists for this to happen automatically as part of an authority's internal records management processes.</p> <p>A statement to support the authority's commitment to keep its RMP under review must appear in the RMP detailing how it will accomplish this task.</p> <p>Read further explanation and guidance about element 13 – http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement13.asp</p> | <p>NAIJB will participate in the annual Progress Update Review that is recommended by the National Records Scotland to ensure records management practices are regularly reviewed, and where necessary, require to be updated.</p> <p>NAIJB will also ensure ongoing assessment of those elements of the plan for which it holds direct and sole responsibility, i.e. elements 1 and 14.</p> | <p>Evidence attached:</p> <p>Letter of confirmation from North Ayrshire Council</p> | <p>What further development, if any, remains to be undertaken to bring this element into full compliance</p> |

| RMP Element Description | North Ayrshire Integration Joint Board (IJB) Compliance Statement | Evidence | Further Development |
|--|---|---|--|
| <p>Element 14: Shared Information</p> <p>The Keeper will expect an authority's RMP to reflect its procedures for sharing information. Authorities who share, or are planning to share, information must provide evidence that they have considered the implications of information sharing on good records management.</p> <p>Information sharing protocols act as high level statements of principles on sharing and associated issues, and provide general guidance to staff on sharing information or disclosing it to another party. It may therefore be necessary for an authority's RMP to include reference to information sharing protocols that govern how the authority will exchange information with others and make provision for appropriate governance procedures.</p> <p>Specifically the Keeper will expect assurances that an authority's information sharing procedures are clear about the purpose of record sharing which will normally be based on professional obligations. The Keeper will also expect to see a statement regarding the security of transfer of information, or records, between authorities whatever the format.</p> | <p>NAIJB have in place information sharing agreements to support the regular sharing of information between parties. The aim of the Information Sharing Agreement is to facilitate the sharing of information and put in place a framework which will allow information to be exchanged in ways which respect the rights of individuals and in compliance with the law</p> | <p>Evidence attached:</p> <ul style="list-style-type: none"> • IJB Report 02/04/15 re Information Sharing • Information Sharing Agreement: <p>NHS Ayrshire & Arran/ North/South/East Ayrshire Councils & North/South/East Ayrshire Integration Joint Boards</p> <p>Information Sharing Agreement Common Services Agency</p> | <p>What further development, if any, remains to be undertaken to bring this element into full compliance</p> |

DIRECTOR (North Ayrshire Health & Social Care Partnership): Stephen Brown
5th Floor West Wing, Cunninghame House, Friarscroft, Irvine, KA12 8EE
Tel: 01294 317700

Your Ref: Our Ref:

If telephoning please call: 01294 317700

Registrar General and Keeper of the
Records of Scotland
National Records of Scotland
HM General Register House
2 Princes Street
EDINBURGH
EH1 3YY

Dear Sir

Public Records (Scotland) Act 2001 – North Ayrshire Integration Joint Board Records Management Plan

The Public Records (Scotland) Act requires North Ayrshire Integration Joint Board (NAIJB) to produce and follow a records management plan. The plan covers 14 elements which the Board will implement:

1. Senior Management responsibility
2. Records Manager responsibility
3. Records Management policy statement
4. Business Classification
5. Retention Schedules
6. Destruction arrangements
7. Archiving and transfer arrangements
8. Information Security
9. Data Protection
10. Business continuity and vital records
11. Audit trail
12. Competency framework for records management staff
13. Assessment and review
14. Shared Information

As the Chief Officer I confirm that I have overall responsibility for the North Ayrshire Integration Joint Board (NAIJB) Records Management Plan which has my full support and that of the Integration Joint Board members.

I also fully endorse the policy statement that NAIJB records will be managed in accordance with North Ayrshire Council policies and procedures and that Ms Lauren Lewis, Information

Management Officer is the designated Officer of the Council who has operational responsibility for records management.

In following good practice, North Ayrshire Integration Joint Board will ensure it has confidence of the public in our data and information management and that we comply with legislation including the Freedom of Information (Scotland) Act 2002, the Data Protection Act 2018 and other access to information legislation.

Yours faithfully

A handwritten signature in black ink, appearing to read 'S. Brown', with a long horizontal flourish extending to the right.

Stephen Brown
Director Health & Social Care Partnership
Chief Officer North Ayrshire Integration Joint Board