



Dumfries and Galloway Integration Joint Board

Draft Records Management Plan

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

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Introduction:

Dumfries and Galloway Integration Joint Board is fully committed to compliance with the requirements of the Public Records (Scotland) Act 2011, which came into force on the 1st January 2013. Dumfries and Galloway 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 arrangement.

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 Dumfries and Galloway 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 2014 provides the legislative framework for the integration of health and social care services in Scotland.

It puts in place:

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

Dumfries and Galloway Integration Joint Board

Dumfries and Galloway Integration Joint Board (the IJB) is responsible for the planning and delivery of health and social care integrated functions for Dumfries and Galloway.

The IJB's Integration Scheme sets out the functions which are delegated by NHS Dumfries and Galloway and Dumfries and Galloway Council to the IJB.

The IJB operates as a body corporate (a separate legal entity), acting independently of NHS Dumfries and Galloway and Dumfries and Galloway Council. The IJB consists of 10 voting members (5 from NHS Dumfries and Galloway and 5 from Dumfries and Galloway Council), a number of members who are drawn from the third, independent sector, staff, carers and service users. The IJB is advised by a number of professionals including the Chief Officer,

Chief Social Work Officer, Chief Finance Officer, Nurse Director, and Medical Directors for both primary and secondary care.

The key functions of the IJB are to:

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

Information underpins the 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 IJB is fully committed to creating, managing, disclosing, protecting and disposing of information effectively.

Assessment and Review

Section 5(1) of the Act requires authorities to keep their plans under review to ensure its arrangements remain fit for purpose; therefore, all elements will be reviewed in the event of any relevant change in personnel, legislation, role and or responsibilities.

The RMP will be reviewed on a regular basis with a formal review being carried out on an annual basis.

Responsible Officer

Julie White, Chief Officer, will be responsible for all elements of the Records Management Plan with the support of NHS Dumfries and Galloway and Dumfries and Galloway Regional Council Officers if required.

Element 1: Senior Management Responsibility				
RMP Element Description	Dumfries and Galloway Integration Joint Board Compliance Statement	Evidence		Further Development
<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 must 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>Responsibility for oversight of compliance with the IJB’s RMP will rest with Julie White, Chief Officer of the Integration Joint Board and Chief Officer of the Health and Social Care Partnership.</p> <p>Implementation of this plan will be provided by the Corporate Governance Officer of the IJB, Alison Warrick, whose details have already been supplied to the Keeper.</p> <p>The Clinical Director of NHS Dumfries and Galloway will also be responsible for the oversight of compliance in respect of records of the IJB created in its role as a body corporate and its strategic planning functions. Dr Ken Donaldson, who has overall strategic accountability for records management, is also the Senior Information Risk Officer (SIRO) for the IJB.</p>	<p>Item 1</p> <p>Item 2</p> <p>Item 3</p>	<p>Letter from Chief Officer</p> <p>Integration Joint Board Records Management Policy</p> <p>Reporting Structure</p>	<p>What further development, if any, remains to be undertaken to bring this element into full compliance?</p>

Element 2: Records Manager Responsibility				
RMP Element Description	Dumfries and Galloway Integration Joint Board Compliance Statement	Evidence		Further Development
<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. 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, 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 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</p>	<p>Responsibility and compliance of the IJB's corporate records sits with the Corporate Governance Officer, Alison Warrick, who will manage the Records Management Plan as well as all other strategic documentation on behalf of the IJB.</p> <p>The role of records manager in respect of records created by Dumfries and Galloway Council in carrying out the IJB's functions, under the direction of the IJB, will be carried out by Dumfries and Galloway Council's Records and Information Management Officer as specified in their Records Management Plan.</p> <p>The role of records manager in respect of records created by NHS Dumfries and Galloway in carrying out the IJB's functions, under the direction of the IJB, and stored on NHS Dumfries and Galloway systems, will be managed by NHS Dumfries and Galloway's Corporate Business Manager.</p>	Item 1	Letter form Chief Officer with list of documents	<p>What further development, if any, remains to be undertaken to bring this element into full compliance?</p>
		Item 3	Reporting Structure	
		Item 4	List of Policies and Procedures	
		Item 5	Job Description for IJB Corporate Governance Officer	
		Item 6	Job Description for Records and Information Management Officer	
		Item 7	Job Description for Corporate Business Manager	

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.				
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Element 3: Records Management Policy Statement				
RMP Element Description	Dumfries and Galloway Integration Joint Board Compliance Statement	Evidence		Further Development
<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 operative 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</p>	<p>Dumfries and Galloway Integration Joint Board creates electronic public records which are held on NHS Dumfries and Galloway systems which are managed under their Records Management Plan which has previously been approved by the Keeper.</p> <p>All records created by or on behalf of the IJB are public assets, and are protected under secure systems and managed into destruction or permanent preservation as appropriate.</p> <p>The IJB Records Management Policy is reflective of the recordkeeping arrangements of the IJB and makes reference to the policy statements of both Dumfries and Galloway Council and NHS Dumfries and Galloway Records Management Policies. The Policies set out the principles and the responsibilities of information management in the IJB that are imperative to records management.</p> <p>The IJB Records Management Policy which confirms their knowledge of the importance of ensuring that its records are managed in accordance with the Records Management Policies of both Dumfries and Galloway Council and NHS Dumfries and Galloway.</p>	<p>Item 8</p> <p>Item 9</p> <p>Item 2</p> <p>Item 10</p>	<p>Dumfries and Galloway Council Records Management Policy</p> <p>NHS Dumfries and Galloway Records Management Policy</p> <p>IJB Records Management Policy</p> <p>Minute of the IJB of the 24th July – confirming approval of the Records Management Plan</p>	<p>The IJB needs to develop an Information Governance Strategy which should be completed by the end of the year.</p>

<p>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>				
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Element 4: Business Classification				
RMP Element Description	Dumfries and Galloway Integration Joint Board Compliance Statement	Evidence		Further Development
<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 provide 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,</p>	<p>The IJB is aware of its statutory functions and what business area exists to administer these functions.</p> <p>IJB corporate documentation is hosted on NHS Dumfries and Galloway systems, however, at this time they do not have a business classification scheme in place but have decided to adopt an Asset Register model which they are currently progressing and which is due for completion by the end of 2019. Once completed the IJB will ensure that it complies with this.</p> <p>For the purpose of transparency Dumfries and Galloway Council's business classification policy has been added for information.</p>	Item 11	Dumfries and Galloway Council Business Classification Scheme Policy	Ensure that the NHS Dumfries and Galloway Information Asset Register is completed within specified timeframes.

<p>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 records systems which it operates.</p>				
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Element 5: Retention Schedules				
RMP Element Description	Dumfries and Galloway Integration Joint Board Compliance Statement	Evidence		Further Development
<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 evidence of and adhere 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 considering 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>Dumfries and Galloway Integration Joint Board records are held electronically on NHS Dumfries and Galloway systems.</p> <p>To ensure consistency with the RMP of NHS Dumfries and Galloway the IJB’s retention schedules incorporate the relevant sections of the retention schedules of NHS Dumfries and Galloway which will apply to all records created by NHS Dumfries and Galloway in carrying out of the IJB’s functions. This is outlined within their Health and Administration Records Management Policy.</p> <p>There is no automatic system in place for destroying/archiving the IJB’s records at this time.</p> <p>Retention capabilities of the electronic systems are covered by the RMP’s of the partner organisations.</p>	<p>Item 9</p> <p>Item 10</p>	<p>Dumfries and Galloway Council Records Retention Schedule</p> <p>NHS Dumfries and Galloway Health and Administration Records Management Policy</p>	<p>What further development, if any, remains to be undertaken to bring this element into full compliance?</p>

<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 (see 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 principles that retention rules are consistently applied across all of an authority's records system.</p>				
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Element 6: Destruction Arrangements				
RMP Element Description	Dumfries and Galloway Integration Joint Board Compliance Statement	Evidence		Further Development
<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 authority’s destruction arrangements. These should demonstrate security precautions 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>As alluded to in Element 5 Dumfries and Galloway Integration Joint Board’s corporate records are held digitally on NHS Dumfries and Galloway systems.</p> <p>In the case of any printed copies, Dumfries and Galloway Council and NHS Dumfries and Galloway have arrangements in place to destroy records that have been identified for destruction. This is outlined in NHS Dumfries and Galloway’s Disposal of Confidential Waste Policy and Dumfries and Galloway Council’s Records Destruction Arrangements Policy.</p>	<p>Item 14</p> <p>Item 15</p> <p>Item 16</p>	<p>NHS Dumfries and Galloway Disposal of Confidential Waste</p> <p>Destruction Certificates from Data Company</p> <p>Dumfries and Galloway Council Records Destruction Arrangements Policy</p>	<p>What further development, if any, remains to be undertaken to bring this element into full compliance?</p>

Element 7: Archiving and Transfer Arrangements				
RMP Element Description	Dumfries and Galloway Integration Joint Board Compliance Statement	Evidence		Further Development
<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, culture 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</p>	<p>All IJB corporate records are held electronically on NHS Dumfries and Galloway systems and are covered by their retention plans which are outlined in their Health and Administration Records Management Policy.</p> <p>A Memorandum of Understanding has been established between NHS Dumfries and Galloway and Dumfries and Galloway Council archives for all paper copies, which will also apply to any IJB papers copies from NHS Dumfries and Galloway systems.</p> <p>The initial agreement was made in 2008 when it was agreed that all of Dumfries and Galloway Health Board’s archive would be deposited with Dumfries and Galloway Council.</p>	<p>Item 13</p> <p>Item 17</p>	<p>NHS Dumfries and Galloway Health and Administration Records Management Policy</p> <p>NHS Dumfries and Galloway/Dumfries and Galloway Council Archive Memorandum of Understanding</p>	<p>What further development, if any, remains to be undertaken to bring this element into full compliance?</p>

this will determine the appropriate management regime.				
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Element 8: Information Security				
RMP Element Description	Dumfries and Galloway Integration Joint Board Compliance Statement	Evidence		Further Development
<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 must 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 must 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>The IJB is confident that all information security arrangements are in place and strictly adhered to by the policies and procedures in place on NHS Dumfries and Galloway systems and are accessible to any member of NHS staff working on behalf of the Health and Social Care Partnership.</p> <p>All documents stored on NHS Dumfries and Galloway systems on behalf of the IJB and the wider Health and Social Care Partnership are accessible only by authorisation of the folders owner, Julie White, Chief Officer.</p> <p>Any employees of Dumfries and Galloway Council who create records for the IJB on Council systems are covered by their own Policies.</p>	<p>Item 18</p> <p>Item 19</p> <p>Item 20</p> <p>Item 21</p> <p>tem 22</p>	<p>NHS Dumfries and Galloway Information Security Policy</p> <p>Screen shot of s drive Health and Social Care folder</p> <p>Dumfries and Galloway Council Records Management Procedures and Standards</p> <p>Dumfries and Galloway Council Security Classification Scheme</p> <p>Dumfries and Galloway Council Acceptable Use Policy</p>	<p>What further development, if any, remains to be undertaken to bring this element into full compliance?</p>

Element 9: Data Protection				
RMP Element Description	Dumfries and Galloway Integration Joint Board Compliance Statement	Evidence		Further Development
<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 processes information about stakeholders, clients, employees or suppliers, it is legally obliged to protect that information. Under the Data Protection Act 2018, 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 must 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 must be afforded access to it on request.</p>	<p>The IJB treats its obligations under the General Data Protection Regulation 2016 and the Data Protection Act 2018 very seriously and this Plan recognises the role robust records management practice has on the Board’s ability to meet its obligations. As records of the Board are primarily held on NHS Dumfries and Galloway systems any Data Protection concerns are addressed through their Data Protection Officer and ICO registration.</p> <p>Personal data is processed by the IJB through our Complaints Handling Procedure and our Freedom of Information Policy. This information is stored solely on NHS Dumfries and Galloway systems.</p> <p>Any employees of Dumfries and Galloway Council who create records for the IJB on Council systems are covered by their own Data Protection Policy.</p>	<p>Item 23</p> <p>Item 24</p> <p>Item 25</p> <p>Item 26</p>	<p>NHS Dumfries and Galloway Data Protection Policy</p> <p>IJB Complaints Handling Policy</p> <p>IJB Freedom of Information Policy</p> <p>Dumfries and Galloway Council Data Protection Policy</p>	<p>The IJB FOI Policy is currently under review and will be presented to the next IJB meeting in September 2019 for approval.</p>

Element 10: Business Continuity and Vital Records				
RMP Element Description	Dumfries and Galloway Integration Joint Board Compliance Statement	Evidence		Further Development
<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 person 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>The IJB records under this element are wholly covered by the arrangements, policies and procedures of NHS Dumfries and Galloway.</p> <p>IJB records are covered by the business continuity management overview which incorporates business continuity arrangements for IT systems.</p> <p>Any employees of Dumfries and Galloway Council who create records for the IJB on Council systems are covered by their Policies.</p>	Item 27	NHS Dumfries and Galloway Business Continuity Management Overview and Framework	<p>What further development, if any, remains to be undertaken to bring this element into full compliance?</p>

Element 11: Audit Trail				
RMP Element Description	Dumfries and Galloway Integration Joint Board Compliance Statement	Evidence		Further Development
<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>The audit 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>The IJB Records are held electronically on NHS Dumfries and Galloway systems and are covered by the audit trail provisions of the organisation, namely the NHS Dumfries and Galloway Access to Information System Policy.</p> <p>The IJB has recently adopted an improved method of document control which outlines the changes made each time a document is updated and who made them to provide an audit trail.</p>	<p>Item 28</p> <p>Item 29</p>	<p>NHS Dumfries and Galloway Access to Information System Policy</p> <p>Screen shot of Policy with updated document control</p>	<p>What further development, if any, remains to be undertaken to bring this element into full compliance?</p>

Element 12: Competency Framework for Records Management Staff				
RMP Element Description	Dumfries and Galloway Integration Joint Board Compliance Statement	Evidence		Further Development
<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 sets 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</p>	<p>The IJB recognises that records management is an entirely separate function from general office duties and acknowledge the importance of records management principles and practices. Senior management recognise the importance of the continued development of staff with records management responsibilities within service and is open to staff development (CPD), where appropriate. The IJB has appointed its own Governance Officer with this regard who will fulfil this duty.</p> <p>NHS Dumfries and Galloway records management systems are managed by the NHS corporate business manager.</p> <p>All staff on entering service to NHS Dumfries and Galloway are provided with corporate and localised induction part of which is to familiarise themselves with the policies and procedures of the organisation of which Data Protection is one.</p> <p>Dumfries and Galloway Council currently provides corporate support on managing electronic and hard copy records via their information Records Management Officer and provides information on the Council's intranet in accordance with its business</p>	<p>Item 5</p> <p>Item 6</p> <p>Item 7</p> <p>Item 30</p>	<p>JD for IJB Corporate Governance Officer</p> <p>NHS D&G JD for Corporate Business Manager</p> <p>Dumfries and Galloway Council Information Records Management Officer JD</p> <p>NHS D&G Corporate Induction Checklist</p>	<p>What further development, if any, remains to be undertaken to bring this element into full compliance?</p>

<p>management service to the authority.</p>	<p>requirements and their responsibilities under the PRSA. This includes records created by the IJB corporately which are stored on Council systems and records created by the Council in carrying out functions on behalf of the IJB.</p> <p>All staff employed by Dumfries and Galloway Council have access to e-learning courses.</p>			
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Element 13: Assessment and Review				
RMP Element Description	Dumfries and Galloway Integration Joint Board Compliance Statement	Evidence		Further Development
<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 must 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 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>The IJB will review the plan annually to ensure that the provisions contained in it remain fit for purpose, however if changes are required in the interim the plan will be updated more frequently.</p> <p>The review of the RMP has been added to the Agenda Matrix for the IJB which will ensure that the RMP is brought forward each year to the IJB for review.</p>	Item 31	Integration Board Agenda Matrix Joint Rolling	<p>What further development, if any, remains to be undertaken to bring this element into full compliance?</p>

Element 14: Shared Information				
RMP Element Description	Dumfries and Galloway Integration Joint Board Compliance Statement	Evidence		Further Development
<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>An Information Sharing Protocol has recently been signed by both organisations to allow for appropriate representatives access to relevant information of patients/clients using a web portal which is hosted within NHS Dumfries and Galloway systems.</p> <p>Security of such information will be covered by the Policies of both organisations</p>	Item 32	Information Sharing Protocol between NHS Dumfries and Galloway and Dumfries and Galloway Council	<p>What further development, if any, remains to be undertaken to bring this element into full compliance?</p>
		Item 18	NHS Dumfries and Galloway Information Security Policy	
		Item 20	Dumfries and Galloway Council Records Management Procedures and Standards	
		Item 21	Dumfries and Galloway Council Security Classification Scheme	
		Item 22	Dumfries and Galloway Council Acceptable Use Policy	

Evidence

1. Letter from Chief Officer
2. Integration Joint Board Records Management Policy
3. Reporting Structure
4. List of Policies and Procedures
5. Job Description for IJB Corporate Governance Officer
6. Job Description for Records and Information Management Officer
7. Job Description for NHS Corporate Business Manager
8. Dumfries and Galloway Council Records Management Policy
9. NHS Dumfries and Galloway Records Management Policy
10. Excerpt of the IJB Minute of the 24th July 2019
11. Dumfries and Galloway Council Business Classification Scheme Policy
12. Dumfries and Galloway Council Records Retention Schedule
13. NHS Dumfries and Galloway Health and Administration Records Management Policy
14. NHS Dumfries and Galloway Disposal of Confidential Waste
15. Sample of NHS Dumfries and Galloway destruction certificates from Data Company
16. Dumfries and Galloway Council Records Destruction Arrangements Policy
17. NHS Dumfries and Galloway and Dumfries and Galloway Council Memorandum of Understanding
18. NHS Dumfries and Galloway Information Security Policy
19. Screenshot from NHS Dumfries and Galloway shared drive showing Health and Social Care Folder
20. Dumfries and Galloway Council Records Management Processes and Standards
21. Dumfries and Galloway Council Security Classification Scheme
22. Dumfries and Galloway Council Acceptable Use Policy
23. NHS Dumfries and Galloway Data Protection Policy
24. IJB Complaints Handling Policy
25. IJB FOI Policy
26. Dumfries and Galloway Council Data Protection Policy
27. NHS Dumfries and Galloway Business Continuity Management Overview and Framework
28. NHS Dumfries and Galloway Access to Information Systems Policy
29. Screenshot of Policy with revised document control.
30. NHS Dumfries and Galloway Corporate Induction Checklist
31. IJB Rolling Agenda Matrix
32. Information Sharing Protocol between NHS Dumfries and Galloway and Dumfries and Galloway Council