



# Dumfries and Galloway Integration Joint Board

## Records Management Plan

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

Document Control		Policy No:	IJBPI002
Policy Group	IJB Governance Documents		
Author	Alison Warrick	Version No:	2.0
Reviewer	IJB	Implementation Date:	31 <sup>st</sup> July 2019
Status	Approved	Review Date:	July 2020
Approved By	IJB July 2019	Last Review Date:	July 2019
Impact Assessed		Data Impact Assessed	

Version Control	Date	Summary of Changes	Name
0.1	03/06/19	Initial Draft	Alison Warrick
0.2	03/07/19	Feedback from Head of Information Governance – NHS	John Mcgonigle
0.3	08/07/19	Incorporated Dumfries and Galloway Council documentation	Alison Warrick
0.4	09/07/19	Comments from Chief Officer	Alison Warrick
1.0	24/07/19	Approved by IJB	
1.1	30/07/20	Redraft following suggested changes by Scottish Government	Alison Warrick
2.0	03/12/20	Approved by the Integration Joint Board	Integration Joint Board

## **Contents**

### **Records Management Plan**

#### **Summary**

#### **About the Public Records (Scotland) Act 2011**

#### **About the Dumfries and Galloway Integration Joint Board**

#### **Assessment and Review**

#### **RMP Element Description:**

Element 1: Senior Management Responsibility

Element 2: Records Manager Responsibility

Element 3: Records Management Statement

Element 4: Business Classification Scheme

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: Public records created or held by third parties

## **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 1<sup>st</sup> January 2013.

## **About the Public Records (Scotland) Act 2011**

The Public Records (Scotland) Act 2011 (the Act) came into force on the 1<sup>st</sup> 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 Strategic 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 a bi-annual basis.

### **Responsible Officer**

Julie White, Chief Officer for the Dumfries and Galloway Integration Joint Board, will be responsible for all elements of the Records Management Plan.

<b>Element 1: Senior Management Responsibility</b>				
<b>RMP Element Description</b>	<b>Dumfries and Galloway Integration Joint Board Compliance Statement</b>	<b>Evidence</b>		<b>Further Development</b>
<p><b>Section 1 (2) (a) (i) of the Act specifically requires a RMP to identify the individual responsible for the management of the authority's public records. An authority's RMP must name and provide the job title of the senior manager who accepts overall responsibility for the RMP that has been submitted.</b></p> <p><b>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.</b></p> <p><b>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).</b></p>	<p>Responsibility for oversight of compliance with the IJB's Records Management Plan will rest with Julie White, the Chief Officer of the Integration Joint Board and Chief Officer for the Health and Social Care Partnership who has senior responsibility for all aspects of the IJB's records management.</p> <p>The Chief Officer chairs the Health and Social Care Executive Group which has strategic responsibility for the Health and Social Care Partnership.</p>	Item 1	Letter from Chief Officer	

Element 2: Records Manager Responsibility				
RMP Element Description	Dumfries and Galloway Integration Joint Board Compliance Statement	Evidence		Further Development
<p><b>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 must give details of the arrangements in</b></p>	<p>The confirmation of operational management responsibility for the Records Management Plan is a compulsory element under the Public Records (Scotland) Act 2011. The Records Manager who is responsible for the day-to-day implementation and compliance with the Records Management Plan is Alison Warrick, Board Secretary/Governance Lead</p> <p>Roles undertaken by this post are:</p> <ul style="list-style-type: none"> <li>• Managing the IJB's corporate records</li> <li>• Reviewing and implementing operational policies and procedures in line with the RMP</li> <li>• Ensuring any staff who access records of the IJB have an understanding of this Records Management Plan and the Records Management Policy.</li> </ul> <p>Support is available from NHS Dumfries and Galloway Records Management Team when required. (This is vital as the public records of the IJB are held on NHS Dumfries and Galloway systems)</p> <p>The Board Secretary/Governance Lead</p>	Item 1	Letter form Chief Officer	<p><b>The job description for the Board Secretary/Corporate Governance Lead is currently being developed</b></p>
		Item 2	Draft Job Description for Board Secretary/Corporate Governance Lead	
		Item 3	Minute of the IJB Meeting of the 3 <sup>rd</sup> December 2020.	
		Item 4	Copy of email from Frank Rankin regarding completion of course.	

<b>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.</b>	has undertaken the learning for the Practitioner Certificate in Scottish Public Records Management, however, has not submitted the Portfolio evidence.			
--	--	--	--	--

Element 3: Records Management Policy Statement				
RMP Element Description	Dumfries and Galloway Integration Joint Board Compliance Statement	Evidence		Further Development
<p><b>The Keeper expects each authority's plan to include a records management policy statement. The policy statement should describe how the authority creates and manages authentic, reliable and useable records, capable of supporting business functions and activities for as long as they are required. The policy statement should be made available to all staff, at all levels in the authority. The statement will properly reflect the business functions of the public authority. The Keeper will expect authorities with a wide range of functions operating in a complex legislative environment to develop a fuller statement than a smaller authority. The records management statement should define the legislative, regulatory and best practice framework, within which the authority operates and give an overview of the records management processes and systems within the authority and describe how these support the authority in carrying out its business effectively. For electronic records the statement should describe how metadata is created and maintained. It should be clear that the authority understands what is required to operative an effective records management system which embraces records in all formats.</b></p> <p><b>The records management statement should include a description of the mechanism for records management issues being</b></p>	<p>Dumfries and Galloway Integration Joint Board creates electronic public records which are held on NHS Dumfries and Galloway systems, to support this fact a Memorandum of Understanding between NHS Dumfries and Galloway and Dumfries and Galloway Integration Joint Board is in place.</p> <p>To support records management within health and social, Scottish Government have recently published the Scottish Government Records Management Health and Social Care Code of Practice (Scotland) 2020.</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 statement of NHS Dumfries and Galloway Records Management Policy in that – <i>NHS Dumfries and Galloway is committed to a systematic and planned approach to the management of records within the organisation, from their creation to their ultimate disposal.</i></p>	<p>Item 5</p> <p>Item 6</p> <p>Item 7</p> <p>Item 8</p> <p>Item 9</p> <p>Item 3</p>	<p>Memorandum of Understanding between NHS Dumfries and Galloway and the Integration Joint Board</p> <p>Scottish Government Records Management Health and Social Care Code of Practice (Scotland) 2020</p> <p>IJB Records Management Policy</p> <p>NHS Dumfries and Galloway Records Management Plan</p> <p>NHS Dumfries and Galloway Health and Administration Records Management Policy</p> <p>Minute of the IJB of the 3<sup>rd</sup> December 2020 – confirming approval of the Records Management Plan</p>	

<p><b>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.</b></p>	<p>All staff who are responsible for the upkeep of records on behalf of the IJB are employed by NHS Dumfries and Galloway and as such have access to all policies and procedures produced by NHS Dumfries and Galloway via their Beacon Intranet page.</p>	<p>Item 10</p>	<p>Screenshot of Intranet page (Beacon) showing Policies/Procedures</p>	
---	--	----------------	---	--

<b>Element 4: Business Classification</b>				
<b>RMP Element Description</b>	<b>Dumfries and Galloway Integration Joint Board Compliance Statement</b>	<b>Evidence</b>		<b>Further Development</b>
<p><b>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.</b></p> <p><b>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.</b></p> <p><b>A business classification scheme allows an authority to map its functions and provide a structure for operating a disposal schedule effectively.</b></p> <p><b>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,</b></p>	<p>As the IJB continues to evolve so will the type and volume of records it creates. As IJB records are stored on the systems of NHS Dumfries and Galloway, the IJB follows the Business Classification Scheme Framework of NHS Dumfries and Galloway.</p> <p>The IJBs Business Classification Scheme, although in the early stages of development, hopefully provides a level of assurance to the commitment of good record keeping practices. This will be used to assist those who create and store information on behalf of the IJB and will be incorporated into NHS Dumfries and Galloway's Business Classification Scheme.</p> <p>The IJB will formally review its Business Classification Scheme as part of the review of the Records Management Plan and Policy which are scheduled for annual review. However if changes are required in the interim these will be made and reported back to the IJB by the Corporate Governance Officer.</p>	<p>Item 11</p> <p>Item 12</p> <p>Item 13</p>	<p>NHS Dumfries and Galloway Draft Business Classification Framework</p> <p>IJB Business Classification Scheme (incorporating Record Retention Schedule)</p> <p>Screenshot of Health and Social Care Integration shared drive page, which incorporates IJB records, held on NHS Dumfries and Galloway systems.</p>	<p>The Business Classification Scheme (incorporating Records Retention Schedule) will be amended as required, this still requires to be incorporated in to NHS Dumfries and Galloway Business Classification Scheme however due to capacity issues this has yet to happen.</p>

<p><b>but without it the authority cannot show that it has a full understanding or effective control of the information it keeps.</b></p> <p><b>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.</b></p> <p><b>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.</b></p>				
---	--	--	--	--

<b>Element 5: Retention Schedules</b>				
<b>RMP Element Description</b>	<b>Dumfries and Galloway Integration Joint Board Compliance Statement</b>	<b>Evidence</b>		<b>Further Development</b>
<p><b>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.</b></p> <p><b>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).</b></p> <p><b>The principal reasons for creating retention schedules are:</b></p> <ul style="list-style-type: none"> <li><b>to ensure records are kept for as long as they are needed and then disposed of appropriately</b></li> <li><b>to ensure all legitimate considerations and future uses are considering in reaching the final decision</b></li> <li><b>to provide clarity as to which records are still held by an authority and which have been deliberately destroyed.</b></li> </ul>	<p>The scheduling of all records retention for IJB records is undertaken following NHS Dumfries and Galloway's retention practices which are outlined in their NHS Dumfries and Galloway Health and Administration Records Management Policy.</p> <p>The above NHS policy draws on the guidelines specified in the Scottish Government Records Management: NHS Code of Practice (Scotland) v2.1 January 2012. Going forward this will be updated to include the revised Scottish Government Records Management Health and Social Care Code of Practice (Scotland) 2020</p> <p>The Records Manager for the IJB corporate records is committed to working with the Information Assurance Team of NHS Dumfries and Galloway to ensure that all future iterations of documents, where appropriate, make reference to the IJB.</p> <p>As part of the work being carried out in Section 4 of this plan – Business Classification Scheme, which is a work in progress, retention schedules will be included as part of the BSC.</p> <p>There is no automatic system in place for</p>	<p>Item 9</p> <p>Item 14</p> <p>Item 6</p> <p>Item 12</p>	<p>NHS Dumfries and Galloway Health and Administration Records Management Policy (the next iteration of this will include the IJB) from Section 20 onwards.</p> <p>Scottish Government Records Management: NHS Code of Practice (Scotland) v2.1 January 2012</p> <p>Scottish Government Records Management Health and Social Care Code of Practice (Scotland) 2020</p> <p>IJB Business Classification Scheme</p>	

<p><b>'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.</b></p> <p><b>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.</b></p> <p><b>An authority's RMP must demonstrate the principles that retention rules are consistently applied across all of an authority's records system.</b></p>	<p>destroying/archiving the IJB's records at this time.</p>			
--	---	--	--	--

<b>Element 6: Destruction Arrangements</b>				
<b>RMP Element Description</b>	<b>Dumfries and Galloway Integration Joint Board Compliance Statement</b>	<b>Evidence</b>		<b>Further Development</b>
<p><b>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.</b></p> <p><b>An authority's RMP must demonstrate that proper destruction arrangements are in place.</b></p> <p><b>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.</b></p>	<p>All public records of Dumfries and Galloway Integration Joint Board will follow the retention schedules of NHS Dumfries and Galloway as outlined in their Health and Administration Records Management Policy.</p> <p>The IJB has adopted the hardware disposal procedures of NHS Dumfries and Galloway as outlined in their Records Management Plan</p>	<p>Item 9</p> <p>Item 5</p> <p>Item 8</p> <p>Item 15</p> <p>Item 16</p>	<p>NHS Dumfries and Galloway Health and Administration Records Management Policy</p> <p>Memorandum of Understanding</p> <p>NHS Dumfries and Galloway Records Management Plan</p> <p>NHS Dumfries and Galloway Disposal Rules</p> <p>NHS Dumfries and Galloway Confirmation of Destruction/Recycling</p>	

Element 7: Archiving and Transfer Arrangements				
RMP Element Description	Dumfries and Galloway Integration Joint Board Compliance Statement	Evidence		Further Development
<p><b>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.</b></p> <p><b>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.</b></p> <p><b>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</b></p>	<p>All IJB public records are covered by the systems in place for the archiving and transferring of documentation. Section 5a of the NHS Health and Administration Records Management Policy which outlines the process in place.</p> <p>It is important to remember that all records of the IJB are held electronically and are not in paper format.</p> <p>At this time no public records of the IJB have reached the stage for archiving.</p>	<p>Item 9</p> <p>Item 5</p>	<p>NHS Dumfries and Galloway Health and Administration Records Management Policy (Section 5a)</p> <p>Memorandum of Understanding</p>	

<b>permanently maintained should be noted as this will determine the appropriate management regime.</b>				
---	--	--	--	--

<b>Element 8: Information Security</b>				
<b>RMP Element Description</b>	<b>Dumfries and Galloway Integration Joint Board Compliance Statement</b>	<b>Evidence</b>		<b>Further Development</b>
<p><b>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.</b></p> <p><b>An authority's RMP must make provision for the proper level of security for its public records.</b></p> <p><b>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.</b></p> <p><b>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.</b></p>	<p>The IJB has adopted the NHS Dumfries and Galloway Information and Security Policy which has been designed to cover Information Technology (IT) governance and security subjects. All procedures in place are used in line with the NHS Scotland Information Assurance Strategy.</p> <p>The staff who have access to IJB records are employed by NHS Dumfries and Galloway and have access to all NHS Dumfries and Galloway policies and procedures through their Beacon Intranet page.</p> <p>Any breaches in the access of information to which an employee is not entitled to access are handled via NHS Dumfries and Galloway's Fair Warning Guide for Staff and Fair Warning Guide for Managers</p> <p>All staff on commencement of their employment with NHS Dumfries and Galloway, attend an induction session and provided with a Staff Handbook which advises of the importance of following the policies and procedures of the NHS Board as part of their contractual obligations.</p>	<p>Item 17</p> <p>Item 18</p> <p>Item 19</p> <p>Item 10</p> <p>Item 20</p> <p>Item 21</p> <p>Item 22</p> <p>Item 23</p>	<p>NHS Dumfries and Galloway Information Security Policy</p> <p>NHS Scotland Business Continuity Framework</p> <p>NHS Confidentiality and Data Protection Policy</p> <p>Screenshot of Beacon Homepage showing Policies</p> <p>NHS Dumfries and Galloway Fair Warning Guide for Staff</p> <p>NHS Dumfries and Galloway Fair Warning Guide for Managers</p> <p>NHS Dumfries and Galloway Induction Checklist</p> <p>NHS Dumfries and Galloway Staff Handbook</p>	

Element 9: Data Protection				
RMP Element Description	Dumfries and Galloway Integration Joint Board Compliance Statement	Evidence		Further Development
<p><b>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.</b></p> <p><b>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.</b></p>	<p>The IJB treats its obligations under the General Data Protection Regulations and the Data Protection Act 2018 very seriously and this Plan recognises the role robust records management practice has on the IJB's ability to meet its obligations.</p> <p>As public records of the IJB are held on NHS Dumfries and Galloway systems any Data Protection concerns are addressed through their Data Protection Officer and ICO registration in liaison with the IJB Records Manager.</p> <p>The IJB is a public body which will be subject to Freedom of Information and Environmental Impact Requests and although most requests will be responded to by the constituent organisations a Freedom of Information Policy has been established to comply with any requests which relate directly to the IJB.</p> <p>Complaints are dealt with via the IJB Complaints Handling Procedure by the Board Secretary/Corporate Governance Officer who also acts as the Scottish Public Services Ombudsman Liaison Officer. Due to new legislation this is due to be updated by March 2021.</p>	<p>Item 19</p> <p>Item 24</p> <p>Item 25</p> <p>Item 26</p>	<p>NHS Dumfries and Galloway Confidentiality and Data Protection Policy</p> <p>NHS Dumfries and Galloway Data Protection Registration Details</p> <p>IJB Complaints Handling Procedure</p> <p>IJB Freedom of Information Policy</p>	<p>Both the IJB Complaints Handling Policy and the IJB Freedom of Information Policy are due for review. These are scheduled to be presented to the IJB in the new year.</p>

Element 10: Business Continuity and Vital Records				
RMP Element Description	Dumfries and Galloway Integration Joint Board Compliance Statement	Evidence		Further Development
<p><b>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.</b></p> <p><b>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.</b></p>	<p>The IJB public records under this element are wholly covered by the arrangements, plans and procedures of NHS Dumfries and Galloway. These plans include arrangements for the recovery of both physical and digital records and data.</p> <p>All records held on NHS Dumfries and Galloway networks are synchronously replicated to a remote copy to provide a Recovery Point Objective (RPO) of 0 seconds.</p> <p>IJB records are covered by the business continuity management overview which incorporates business continuity arrangements for IT systems by NHS Dumfries and Galloway.</p>	Item 27	NHS Dumfries and Galloway Business Continuity Management Overview and Framework	
		Item 18	NHS Scotland/Scottish Government Business Continuity Framework	
		Item 28	HPE 3PAR Remote Copy replication configuration. NOTE; The schematic diagram provided ONLY shows the system configuration utilised at NHS Dumfries and Galloway. No specific NHS Dumfries and Galloway architecture details are included.	
		Item 19	NHS Dumfries and Galloway Confidentiality and Data Protection Policy	

<b>Element 11: Audit Trail</b>				
<b>RMP Element Description</b>	<b>Dumfries and Galloway Integration Joint Board Compliance Statement</b>	<b>Evidence</b>		<b>Further Development</b>
<p><b>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.</b></p> <p><b>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.</b></p>	<p>The IJB public records are covered by the audit trail provisions of NHS Dumfries and Galloway. NHS Dumfries and Galloway use a monitoring tool to monitor unauthorised access to a series of electronic systems with a specific focus currently in clinical areas. Details of the type of data breach and how these are handled are in their Fair Warning Guides</p> <p>Following an internal governance audit in 2017 the IJB introduced an improved method of document control which outlines the changes made each time a document is updated, its version and who made the changes to provide an audit trail.</p>	<p>Item 20</p> <p>Item 21</p> <p>Item 29</p>	<p>NHS Dumfries and Galloway Fair Warning Staff Guide</p> <p>NHS Dumfries and Galloway Fair Warning Managers Guide</p> <p>Screen shot of Policy with updated document and version control</p>	

Element 12: Competency Framework for Records Management Staff				
RMP Element Description	Dumfries and Galloway Integration Joint Board Compliance Statement	Evidence		Further Development
<p><b>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.</b></p> <p><b>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.</b></p> <p><b>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 management service to the authority.</b></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.</p> <p>Staff who will access, create and update the public records of the IJB are employed by NHS Dumfries and Galloway.</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. This is outlined in their Recruitment, Selection and Induction Policy and Procedure.</p> <p>Part of this induction includes training on Information Governance and Security which is refreshed via the Learn Pro module as part of NHS Dumfries and Galloway's mandatory training programme.</p>	<p>Item 30</p> <p>Item 19</p> <p>Item 31</p>	<p>NHS D&amp;G Recruitment, Selection and Induction Policy and Procedure</p> <p>NHS Confidentiality and Data Protection Policy</p> <p>Screenshot of Mandatory Training covering Information Governance and Security</p>	

<b>Element 13: Assessment and Review</b>				
<b>RMP Element Description</b>	<b>Dumfries and Galloway Integration Joint Board Compliance Statement</b>	<b>Evidence</b>		<b>Further Development</b>
<p><b>Section 1(5) (i) (a) of the Act says that an authority must keep its RMP under review.</b></p> <p><b>An authority's RMP must describe the procedures in place to regularly review it in the future.</b></p> <p><b>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.</b></p> <p><b>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.</b></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>	<p>Item 32</p> <p>Item 1</p>	<p>Integration Board Agenda Matrix</p> <p>Joint Rolling</p> <p>Letter from Chief Officer</p>	

Element 14: Shared Information				
RMP Element Description	Dumfries and Galloway Integration Joint Board Compliance Statement	Evidence		Further Development
<p><b>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.</b></p> <p><b>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.</b></p> <p><b>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.</b></p>	<p>The sharing of information takes place in line with the Data Protection Act 2018 and General Data Protection Regulations.</p> <p>A Memorandum of Understanding is in place between the IJB and NHS Dumfries and Galloway, whose systems IJB public records are held on.</p> <p>NHS Dumfries and Galloway uses the Scottish Accord on the Sharing of Personal Information (SASPI) ISP Guidance to record any Information Sharing Protocols.</p> <p>Under authority of the Integration Joint Board a data sharing agreement between NHS Dumfries and Galloway and Dumfries and Galloway Council is in place to allow the transfer of patient/client information at Health and Social Care Partnership level, to be passed between the organisations for the benefit of those who require the use of health and social care facilities.</p> <p>The IJB adheres to the requirements of the Freedom of Information (Scotland) Act 2002. All Freedom of Information requests are dealt with under the terms of the IJB Freedom of Information Policy.</p>	<p>Item 5</p> <p>Item 33</p> <p>Item 34</p> <p>Item 26</p>	<p>Memorandum of Understanding</p> <p>Scottish Accord on the Sharing of Personal Information - Information Sharing Protocol Guidance</p> <p>Information Sharing Agreement between NHS Dumfries and Galloway and Dumfries and Galloway Council –</p> <p>IJB Freedom of Information Policy</p>	

Element 15: Public records created or held by third parties				
RMP Element Description	Dumfries and Galloway Integration Joint Board Compliance Statement	Evidence		Further Development
<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>No public records of the Dumfries and Galloway Integration Joint Board are held by a third party.</p>			

## Evidence

1. Letter from Chief Officer
2. Draft Job Description – Board Secretary/Corporate Governance Lead
3. Draft Minute of the IJB 3<sup>rd</sup> December 2020
4. Copy of email from Frank Rankin regarding completion of course.
5. Memorandum of Understanding between Dumfries and Galloway Integration Joint Board and NHS Dumfries and Galloway (update 24/05/22 it should be noted that this MoU is based on historical decision making and requires to be updated)
6. Scottish Government Records Management Health and Social Care Code of Practice (Scotland) 2019
7. IJB Records Management Policy
8. NHS Dumfries and Galloway Records Management Plan
9. NHS Dumfries and Galloway Health and Administration Records Policy
10. Screenshot of NHS Beacon – Policies
11. NHS Dumfries and Galloway Business Classification Scheme Framework
12. IJB Draft Business Classification Scheme
13. Screenshot of Shared Drive – IJB
14. Scottish Government Records Management NHS Code of Practice (Scotland) V2.1 January 2012
15. NHS Dumfries and Galloway Disposal Rules
16. NHS Dumfries and Galloway Confirmation of Destruction/Recycling
17. NHS Dumfries and Galloway Information Security Policy
18. NHS Scotland Business Continuity Framework
19. NHS Confidentiality and Data Protection Policy
20. NHS Dumfries and Galloway Fair Warning Guide for Staff
21. NHS Dumfries and Galloway Fair Warning Guide for Manager
22. NHS Dumfries and Galloway Induction Checklist
23. NHS Dumfries and Galloway Staff Handbook
24. NHS Dumfries and Galloway Data Protection Registration
25. IJB Complaints Handling Procedure
26. IJB Freedom of Information Policy
27. NHS Dumfries and Galloway Business Continuity Management Overview and Framework
28. HPE 3PAR Remote Copy Application
29. Screenshot of Policy with updated Document Control
30. NHS Dumfries and Galloway Recruitment, Selection and Induction Policy
31. Screenshot Learn Pro Mandatory Training
32. IJB Rolling Agenda Matrix
33. Scottish Accord on the Sharing of Personal Information – Information Sharing Protocol Guidance
34. Information Sharing Protocol between NHS Dumfries and Galloway and Dumfries and Galloway Council