Midlothian Integration Joint Board
Records Management Plan

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

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

Signed by:

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Allister Short, Chief Officer, Midlothian Integration Joint Board

Document Control Information

Revision	Date	Revision Description
1.0	02/11/2018	Final version submitted to Keeper of Records of Scotland

Table of Contents

Records Management Plan

Summary

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

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

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

Element 1: Senior management responsibility

Element 2: Records manager responsibility

Element 3: Records management policy statement

Element 4: Business classification

Element 5: Retention schedule

Element 6: Destruction arrangements

Element 7: Archiving and transfer arrangements

Element 8: Information security

Element 9: Data protection

Element 10: Business continuity and vital records

Element 11: Audit trail

Element 12: Competency framework for records management staff

Element 13: Assessment and review

Element 14: Shared Information

The IJB is fully committed to compliance with the requirements of the Public Records (Scotland) Act, 2014 which came into force on the 1st January 2016. The IJB will therefore follow procedures that aim to ensure that all of its officers employees of constituent authorities supporting its work, contractors, agents, consultants and other trusted third parties who create public records on behalf of the authority, or manage public records held by the authority, are fully aware of and abide by this plan's arrangements.

About the Public Records (Scotland) Act 2011

The Public Records (Scotland) Act 2011 (the act) came fully into force in January 2013. The Act requires names public authorities to submit a Records Management Plan (RMP) to be agreed by the Keeper of the Records of Scotland. Integration Joint Boards were added to the Act's schedule by the Public Bodies (Joint Working) (Scotland) Act 2014. This document is the Records Management Plan of Midlothian Integration Joint Board.

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

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

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

About Integration Joint Boards

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

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

It will put in place:

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

About Midlothian Integration Joint Board

The Midlothian Integration Joint Board was established under the Public Bodies (Joint Working) Scotland Act 2014. The Midlothian Integration Scheme received Royal Assent on 27th June 2015 and the IJB was formally established on 20th August 2015.

From 1st April 2016 Midlothian IJB became responsible for the planning and oversight of delivery of health and social care functions delegated to it by NHS Lothian and Midlothian Council.

These include adult social care services and criminal justice services and adult health community and some hospital services. The area covered by Midlothian IJB is coterminous with the Midlothian Local Authority.

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

The IJB's key functions are to:

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

Information underpins the IJB's over-arching strategic objective and helps it meet its strategic outcomes. Its information supports it to:

- Demonstrate accountability.
- Provide evidence of actions and decisions.
- Assist with the smooth running of business.
- Help build organisational knowledge.

Good recordkeeping practices lead to greater productivity as less time is taken to locate information. Well managed records will help the IJB make:

- Better decisions based on complete information.
- Smarter and smoother work practices.
- Consistent and collaborative workgroup practices.
- Better resource management.
- Support for research and development.
- Preservation of vital and historical records.

In addition we are more accountable to the public now than ever before through the increased awareness of openness and transparency within government. Knowledge and information management is now formally recognised as a function of government similar to finance, IT and communications. It is expected that the Board is fully committed to creating, managing, disclosing, protecting and disposing of information effectively and legally.

Review

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

RMP Principles

What does the Records Management Plan cover?

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

Why is records management important?

Records are vital for the effective functioning of the IJB: they support the decision-making; document its aims, policies and activities; and ensure that legal, administrative and audit requirements are met.

For records to perform their various functions, some form of management is needed. Management includes control over what is created, development of effective and efficient filing systems to store records, and procedures for retention of records.

Records management principles

Security – Records will be secure from unauthorised or inadvertent alteration or erasure, that access and disclosure will be properly controlled and audit trails will track all use and changes. Records will be held in a robust format which remains readable for as long as records are required.

Accountability – Adequate records are maintained to account fully and transparently for all actions and decisions in particular:

- To protect legal and other rights of staff or those affected by those actions
- To facilitate audit or examination
- To provide credible and authoritative evidence

Quality – Records are complete and accurate and the information they contain is reliable and its authenticity can be guaranteed.

Accessibility – Records and the information within them can be efficiently retrieved by those with a legitimate right of access, for as long as the records are held by the organisation.

Retention and disposal –There are consistent and documented retention and disposal procedures, including provision for permanent preservation of archival records.

Training – that all staff are informed of their record-keeping responsibilities through appropriate training and guidance and if required further support as necessary.

Midlothian IJB Records Management Plan

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

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

https://www.midlothian.gov.uk/info/1347/health_and_social_care/200/health_and_social_care_integration/1

https://midlothian.cmis.uk.com/Live/MidlothianIntegrationJointBoard/tabid/134/ctl/ViewCMIS_CommitteeDetails/mid/503/id/11/Default.aspx

The IJB has agreed with Midlothian Council that all of the IJB's records will be managed by Midlothian Council. The Council operates an in-house records management service, including an off-site Records Centre and associated overflow stores. The Records Centre acts as a central secure store for all semi-current paper records generated across the Council, and it provides a daily file retrieval and return service. In addition, the Records Centre provides off-site storage for the Council's archive collections, which are made available to the public.

The Midlothian IJB Records Management Plan (RMP) is effective from 1st August 2016.The plan will be continuously reviewed and updated. Reports will be submitted annually to the newly established Records Management Planning Group, before formal ratification by the Integration Joint Board.

RMP Element Description	Midlothian Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
Element 1: Senior management responsibility: 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. 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. 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). Read further explanation and guidance about element 1 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement1.asp	The Chief Officer, Allister Short has senior responsibility for all aspects of the IJB's Records Management, and is the corporate owner of this document. The Chief Officer is also the IJB's Senior Information Risk Owner (SIRO). The Chief Officer Chairs the Joint Management Team, which has strategic responsibility for the Health and Social Care Partnership.	Job profile and objectives of Chief Officer Board Records Management Policy, which identifies roles and responsibilities. Roles and responsibilities of the SIRO	What further development, if any, remains to be undertaken to bring this element into full compliance?

RMP Element Description	Midlothian Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
Element 2: Records manager responsibility: 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. Read further explanation and guidance about element 2 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement2.asp	The Operational Officers responsible for records management are: NHS Lothian Roxanne King Operational Business Manager To support business continuity, the NHS' Operational Officer will have a Midlothian Council log in and access to the IJB's records Midlothian Council Tom Welsh Integration Manager Each are able to access and manage IJB information on a daily basis Responsibilities include: • Managing the IJB's records; • Reviewing and implementing operational policies and procedures in line with the RMP; • Ensuring relevant health and social care staff have records management training	The MoU accompanying this document nominates each of these roles within the partner bodies of NHS Lothian and Midlothian Council, as the leads with operational responsibility. Job descriptions for each role are included as evidence to demonstrate that the named individuals have the skills required and can access all IJB records. The MoU sets out that the IJB's records are created and managed by the partner body, Midlothian Council. It indicates that the CO is satisfied that the partner body has appropriate records management arrangements in place. The MoU confirms that the partner authority, Midlothian Council creates, holds and manages into disposal all the IJB's records	What further development, if any, remains to be undertaken to bring this element into full compliance?

RMP Element Description	Midlothian Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
Element 3: Records management policy statement: 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. 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. Read further explanation and guidance about element 3 – http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement3.asp	Midlothian Council and NHS Lothian work in partnership, governed by the Midlothian Integration Joint Board (IJB). Midlothian IJB is responsible for planning health and care services for the Midlothian population. The context of this plan is that most records including employment, service user and internal policies and procedures will continue to be managed in the parent body organisations, i.e. Midlothian Council and NHS Lothian and as such will be covered by their respective record management plans. The records covered by this plan constitute IJB business in terms of: • IJB Meetings- agendas and papers, including Directions • IJB Strategies and Policies, including the Annual Report, Strategic Plan and Delivery Plan All of this information is already in the public domain via the IJB's pages on Midlothian Council's website https://www.midlothian.gov.uk/info/1347/health_and_social_care/200/health_and_social_care_integration/1 https://midlothian.cmis.uk.com/Live/MidlothianIntegrationJointBoard/tabid/134/ctl/ViewCMIS_CommitteeDetails/mid/503/id/11/Default.aspx	**NHS Lothian:** https://www.nhslothian.scot.nhs.uk/OurOrganisation/PublicRecords/Pages/RecordsManagementPlan.aspx http://www.nhslothian.scot.nhs.uk/OurOrganisation/PublicRecords/Documents/NHS%20Lothian%20Records%20Management%20Plan%20-%20V4%2028%20April%202016.pdf **Midlothian Council:** https://www.midlothian.gov.uk/info/200285/access_to_information/439/records_management/1 https://www.midlothian.gov.uk/download/downloads/id/1646/records_management_plan.pdf	What further development, if any, remains to be undertaken to bring this element into full compliance?

RMP Element Description	Midlothian Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
Element 4: Business classification 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. A business classification scheme usually takes the form of a hierarchical model or structure diagram. It records, at a given point in time, the informational assets the business creates and maintains, and in which function or service area they are held. As authorities change the scheme should be regularly reviewed and updated. A business classification scheme allows an authority to map its functions and provides a structure for operating a disposal schedule effectively. 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. 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. 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. Read further explanation and guidance about element 4 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement4.asp	As the IJB has only been in operation since 1st April 2016, the type and volume of record keeping specific to the IJB is evolving rapidly. The IJB will follow the corporate Business Classification Scheme (BCS) adopted by Midlothian Council which identifies its high-level functions and activities. These functions cut across the divisional structures of the Council, enabling the BCS to remain relevant in the event of structural changes to the organisation. Midlothian Council's BCS has been updated to include IJB records. The BCS is a localised version of the model BCS published by the Scottish Council on Archives for use by all Scottish local authorities. This has been discussed and agreed as a sensible approach by NHS Lothian and Midlothian Council. IJB records are part of the Committee Management System and as such have permanent retention status.	The link to Midlothian Council's BCS Policy Document is on page 10 of its Record Management Plan.: https://www.midlothian.gov.uk/download/downloads/id/1646/records_management_plan.pdf A Screenshot of the IJB's file plan accompanies this document. This demonstrates where the IJB's records sit within Midlothian Council's Business Classification Scheme.	What further development, if any, remains to be undertaken to bring this element into full compliance? Currently, only Midlothian Council employees have CS10 training. This will be extended to the NHS Lothian administrative team at the Health & Social Care Partnership

RMP Element Description	Midlothian Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
Element 5: Retention schedules Section 1(2) (b)(iii) of the Act specifically requires a RMP to include provision about the archiving and destruction or other disposal of the authority's public records. An authority's RMP <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). The principal reasons for creating retention schedules are: • 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. "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. 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. An authority's RMP <u>must</u> demonstrate the principle that retention rules are consistently applied across all of an authority's record systems. Read further explanation and guidance about element 5 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement5.asp	A retention schedule is a list of records for which pre-determined disposal dates have been established. The IJB must, however, be able to demonstrate it remains responsible for its records under the partner body schedule. It must be able to demonstrate that disposal periods set against its records under the partner schedule were taken by the Board, in collaboration with the partner body. The partner body's retention policies and procedures (and records manager(s)) will assist the Board in making business-based disposal decisions against its records. These must take into consideration the IJB's statutory obligations. The corporate records including formal IJB reports and minutes will be managed in accordance with the IJB Board Servicing Committee Protocol. As the records will be created and managed by NHS Lothian and Midlothian Council, the IJB will follow what is agreed and in place within each Partner Body.. The Business Classification Scheme used by Midlothian Council (CS10) determines how long documents should be retained. IJB records are part of the Committee Management System and as such have permanent retention status (see Element 4).	**NHS Lothian** NHS Lothian's Record Management Plan includes Retention and Destruction of Records Policy. http://www.nhslothian.scot.nhs.uk/OurOrganisation/PublicRecords/Documents/NHS%20Lothian%20Records%20Management%20Plan%20-%20V4%2028%20April%202016.pdf **Midlothian Council:** See page 11 of: https://www.midlothian.gov.uk/download/downloads/id/1646/records_management_plan.pdf **Midlothian Council's Corporate Retention Schedule:** https://www.midlothian.gov.uk/downloads/file/1632/business_classification_schemeretention_schedule See Tab 8- Democracy	What further development, if any, remains to be undertaken to bring this element into full compliance?

RMP Element Description	Midlothian Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
Element 6: Destruction arrangements 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. An authority's RMP <u>must</u> demonstrate that proper destruction arrangements are in place. 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. Read further explanation and guidance about element 6 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement6.asp	It is not always cost-effective or practical for an authority to securely destroy records in-house. Many authorities engage a contractor to destroy records and ensure the process is supervised and documented. As such, the destruction of IJB records, in all formats, will be undertaken by Midlothian Council. All IJB Records will be held electronically on Midlothian Council's system so no hard copies will require destruction. Electronic destruction policies will be determined at a later date. At this stage there is only a limited volume of records specific to the IJB.	**NHS Lothian** NHS Lothian's Record Management Plan includes Retention and Destruction of Records Policy http://www.nhslothian.scot.nhs.uk/OurOrganisation/PublicRecords/Documents/NHS%20Lothian%20Records%20Management%20Plan%20-%20V4%2028%20April%202016.pdf **Midlothian Council:** https://www.midlothian.gov.uk/download/downloads/id/1646/records_management_plan.pdf **Midlothian Council's Corporate Retention Schedule:** https://www.midlothian.gov.uk/downloads/file/1632/business_classification_schemeretention_schedule See Tab 8- Democracy As Element 5	What further development, if any, remains to be undertaken to bring this element into full compliance

RMP Element Description	Midlothian Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
Element 7: Archiving and transfer arrangements 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. 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. 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. Read further explanation and guidance about element 7- http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement7.asp	All IJB Records will be held electronically on Midlothian Council's system so no hard copies will be archived. Electronic archiving policies will be determined at a later date. At this stage there is only a limited volume of records specific to the IJB. In terms of a procedure, the IJB will follow the Council's plans whereby records are moved into a secure offsite storage facility in Livingston. Digital preservation is not in place and as such, the Council has committed to pursue an Archives Service Improvement Plan over the next five years to address this gap.	The agreed arrangement between the Board and Midlothian Council for IJB records to be included in the archiving and transferring arrangements established by Midlothian Council. https://www.midlothian.gov.uk/download/downloads/id/1646/records_management_plan.pdf	What further development, if any, remains to be undertaken to bring this element into full compliance

RMP Element Description	Midlothian Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
Element 8: Information Security 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. An authority's RMP <u>must</u> make provision for the proper level of security for its public records. All public authorities produce records that are sensitive. An authority's RMP <u>must</u> therefore include evidence that the authority has procedures in place to adequately protect its records. Information security procedures would normally acknowledge data protection and freedom of information obligations as well as any specific legislation or regulatory framework that may apply to the retention and security of records. 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.	Information security is the process by which an authority protects its records and ensures they remain available. It is the means by which an authority guards against unauthorised access and provides for the integrity of the records. Robust information security measures are an acknowledgement that records represent a risk as well as an asset. A public authority should have procedures in place to assess and contain that risk. The IJB will rely on NHS Lothian and Midlothian Council arrangements in terms of systems, devices, information sharing platforms etc. All staff will remain employees of either NHS Lothian or Midlothian Council. As such they will be subject to the policies and procedures of their employer, i.e. NHS Lothian Information Security Policy or Midlothian Information Security policies.	**NHS Lothian Information Security Policy** http://intranet.lothian.scot.nhs.uk/Directory/eHealth/Policies/Other%20NHS%20Lothian%20OrganisationWide%20PoliciesDocumen/eHealth%20IT%20Security%20Policy.pdf **Midlothian Council Information Management Group Remit:** https://www.midlothian.gov.uk/downloads/file/1622/information_management_group_remit	What further development, if any, remains to be undertaken to bring this element into full compliance

RMP Element Description	Midlothian Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
Element 9: Data protection 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. 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. Read further explanation and guidance about element 9 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement9.asp	The Information Commissioner has confirmed that the IJB can be a data controller albeit that it will not hold any personal records of service users/patients. The IJB is registered as a body which will be subject to Freedom of Information applies to the IJB and a local policy will be established albeit that most requests will be addressed directly by the parent bodies. Legislation changed on 25/05/18 which will increase rights of individuals and increase fines for data breaches. IJB Complaints- Tom Welsh is first point of contact IJB records are properly managed for the purposes of Data Protection	ICO Registration details Midlothian IJB is not registered as a Data Controller on the ICO website Board data controller/data processer policies and procedures- FOI, complaints, subject access requests Midlothian Council's Privacy Policy is made available to all staff via the Council's Intranet NHS Lothian's Data Protection Policy http://www.nhslothian.scot.nhs.uk/OurOrganisation/PublicRecords/Documents/Evidence/E09-01%20Data%20Protection%20Policy%20-%20Final%20Version%202.0.pdf Staff training- Data protection/information governance	What further development, if any, remains to be undertaken to bring this element into full compliance

RMP Element Description	Midlothian Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
Element 10: Business continuity and vital records The Keeper will expect an authority's RMP to indicate arrangements in support of records vital to business continuity. Certain records held by authorities are vital to their function. These might include insurance details, current contract information, master personnel files, case files, etc. The RMP will support reasonable procedures for these records to be accessible in the event of an emergency affecting their premises or systems. Authorities should therefore have appropriate business continuity plans ensuring that the critical business activities referred to in their vital records will be able to continue in the event of a disaster. How each authority does this is for them to determine in light of their business needs, but the plan should point to it. Read further explanation and guidance about element 10 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement10.asp	A business continuity and vital records plan serves as the main resource for the preparation for, response to, and recovery from, an emergency that might affect any number of crucial functions in an authority. The IJB's records will be subject to the policies and procedures of the partner body in relation to business continuity. The MoU sets out that the IJB's records are managed in accordance with Midlothian Council's Business Continuity and vital records arrangements. All services will continue to be provided or commissioned directly by NHS Lothian or Midlothian Council. As such there is no direct requirement for the IJB to have its own arrangements for business continuity of vital records. Both NHS Lothian and Midlothian Council have adequate business continuity arrangements to ensure the sustainability of health and social care services for which the IJB has overall responsibility. This will enable the IJB to respond to events and know where vital/critical records are via CS10	**NHS Lothian:** http://www.nhslothian.scot.nhs.uk/OurOrganisation/PublicRecords/Documents/NHS%20Lothian%20Records%20Management%20Plan%20-%20V4%2028%20April%202016.pdf **Midlothian Council:** https://www.midlothian.gov.uk/download/downloads/id/1646/records_management_plan.pdf	What further development, if any, remains to be undertaken to bring this element into full compliance

RMP Element Description	Midlothian Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
Element 11: Audit trail 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. 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. Read further explanation and guidance about element 11 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement11.asp	An audit trail is a sequence of steps documenting the movement and/or editing of a record resulting from activities by individuals, systems or other entities. The IJB's records are created by NHS Lothian and Midlothian Council and are managed via Midlothian Council. The CS10 system gives full version control and ensures that the IJB's records are available at all times and that when accessed for business purposes, that these are the most up to date and current versions. Personal records, policies and procedures and all other corporate records will be accessed by employees through the parent bodies information systems. As the IJB develops its own internal and external information systems consideration will be given to the need for audit trail arrangements.	The MoU sets out the IJB's Audit Trail arrangements **NHS Lothian:** http://www.nhslothian.scot.nhs.uk/OurOrganisation/PublicRecords/Documents/NHS%20Lothian%20Records%20Management%20Plan%20-%20V4%2028%20April%202016.pdf **Midlothian Council:** https://www.midlothian.gov.uk/download/downloads/id/1646/records_management_plan.pdf	What further development, if any, remains to be undertaken to bring this element into full compliance

RMP Element Description	Midlothian Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
Element 12: Competency framework for records management staff 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. 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. 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.	A competency framework lists the core competencies and the key knowledge and skills required by a records manager. It can be used as a basis for developing job specifications, identifying training needs, and assessing performance. The IJB will rely upon the records manager of the partner body for compliance under this element. Training for records management staff will remain the responsibility of the employing bodies Midlothian Council and NHS Lothian. Staff who are managing IJB records are employed by Midlothian Council and have been trained in CS10	The Board's plan must refer to the Competency framework arrangements and evidence under the agreed partner body plan. **NHS Lothian:** NHS-wide training available http://www.nhslothian.scot.nhs.uk/OurOrganisation/PublicRecords/Documents/NHS%20Lothian%20Records%20Management%20Plan%20-%20V4%2028%20April%202016.pdf **Midlothian Council:** Council-wide training available https://www.midlothian.gov.uk/download/downloads/id/1646/records_management_plan.pdf	What further development, if any, remains to be undertaken to bring this element into full compliance CS 10 training to be extended to NHS Lothian administrative team at the Health & Social Care Partnership

RMP Element Description	Midlothian Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
Element 13: Assessment and review Section 1(5) (i)(a) of the Act says that an authority must keep its RMP under review. An authority's RMP <u>must</u> describe the procedures in place to regularly review it in the future. 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. 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. Read further explanation and guidance about element 13 – http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement13.asp	The IJB relies on the partner authority to ensure that the systems, policies and procedures that govern its records are being regularly assessed.. This record management plan will be reviewed and updated through the Joint Management Team. During the first year any gaps in this plan will be identified as issues arise and solutions agreed.	**NHS Lothian:** http://www.nhslothian.scot.nhs.uk/OurOrganisation/PublicRecords/Documents/NHS%20Lothian%20Records%20Management%20Plan%20-%20V4%2028%20April%202016.pdf **Midlothian Council:** https://www.midlothian.gov.uk/download/downloads/id/1646/records_management_plan.pdf	What further development, if any, remains to be undertaken to bring this element into full compliance Establish a RMP Planning Group to meet and review policy before formal ratification by IJB

RMP Element Description	Midlothian Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
Element 14: Shared Information 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. 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. 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.	Under certain conditions, information given in confidence may be shared. Most commonly this relates to personal information, but it can also happen with confidential corporate records. The IJB may well be sharing data or information with its partner bodies that must be managed in accordance with the guidance issued by the Information Commissioner under the Data Protection Act 1998. The Act regards records created by a third party under contract to a public body to deliver a statutory function of that authority as public for the purposes of the Act. This means that authorities in such a relationship must be satisfied that public records being created on its behalf are managed in line with its RMP. It must be satisfied that the third party provider has robust records management arrangements in place. However, it is unlikely that this is relevant to the IJB.	An information sharing protocol has been agreed between NHS Lothian Midlothian Council and the national Information Services Division to enable the safe and effective sharing of information. An Information Exchange Portal has been created to enable secure sharing of personal information between practitioners in accordance with agreed protocols.	What further development, if any, remains to be undertaken to bring this element into full compliance