

DATA LABEL: Public

West Lothian Integration Joint Board

(Draft) Records Management Plan 2018

Document Control Sheet

DOCUMENT CONTROL SHEET

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DOCUMENT TITLE: West Lothian Integration Joint Board Records Management Plan 2018

Review/Approval History

Date	Name	Position	Version Approved

Change Record Table

Date	Author	Version	Status	Reason
12/05/2017	Roberto Riaviz	1.0	Draft	Initial draft
30/03/2018	Carol Dunn	1.1	Draft	Minor updates

Status Description:

Draft - These are documents for review and liable to significant change.

Final - The document is complete and is not expected to change significantly. All changes will be listed in the change record table.

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1. Overview

1.1. Background

The Public Records (Scotland) Act 2011 (hereafter referred to as ‘the Act’) came fully into force in January 2013. The Act obliges West Lothian Integration Joint Board (hereafter referred to as ‘the Board’) and other public authorities to prepare and implement a records management plan (RMP). The RMP sets out proper arrangements for the management of records within the Joint Board.

The Board is fully committed to compliance with the requirements of the Act. The Board will therefore follow procedures that aim to ensure that all of its officers, employees of constituent authorities supporting its work, contractors, agents, consultants and other trusted third parties who create public records on behalf of the board, or manage public records held by the board, are fully aware of and abide by this plan’s arrangements.

1.2. About the Public Records (Scotland) Act 2011

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

The Records Management Plan has 14 Elements.

1. [Senior management responsibility](#)
2. [Records manager responsibility](#)
3. [Records management policy statement](#)
4. [Business classification](#)
5. [Retention schedules](#)
6. [Destruction arrangements](#)
7. [Archiving and transfer arrangements](#)
8. [Information security](#)
9. [Data protection](#)
10. [Business continuity and vital records](#)
11. [Audit trail](#)
12. [Competency framework for records management staff](#)
13. [Assessment and review](#)
14. [Shared information](#)

1.3. 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.

1.4. About West Lothian Integration Joint Board

West Lothian Integration Joint Board is responsible for the planning and oversight of delivery of health and social care integrated functions for West Lothian.

The [West Lothian Integration Joint Board Integration Scheme](#) sets out the functions which are delegated by NHS Lothian and West Lothian Council to the Board.

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

The key functions of the Board are to:

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

Information underpins the Board's over-arching strategic objective and helps it meet its strategic outcomes. 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 Board make:

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

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

1.5. Review

Section 5 (1) of the Act requires authorities to keep their plans under review to ensure its arrangements remain fit for purpose. The plan is agreed with the Keeper of the Records of Scotland (the Keeper) and reviewed by the Board on an annual basis.

1.6. Records Management in West Lothian Integration Joint Board

West Lothian Integration Joint Board has provided the Keeper with evidence of policies, procedures, guidance and operational activity on all elements of the plan.

The plan was agreed with the Keeper **XX/XX/XXXX** and will be reviewed annually.

The Board's Records Management Plan relates to records throughout their lifecycle, from creation and acquisition to archive and destruction. It encompasses all records across all Board service areas.

For more information about the Public Records (Scotland) Act 2011, visit the website of the National Records of Scotland:

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

A copy of the Act can be viewed online via the National Archives website:

<http://www.legislation.gov.uk/asp/2011/12/part/1/enacted>

The records of the Board constitute an auditable account of the authority's activities, which provides evidence of the business, actions, decisions and resulting policies formed by the board.

Records represent a vital asset, which support the daily functions of the Board and protect the interests and rights of staff, and members of the public, who have dealings with the board. Effective record keeping supports efficiency, consistency and continuity of work and enables the Board to deliver a wide range of sustainable services. It ensures that the correct information is: captured, stored, maintained, retrieved and destroyed or preserved in accordance with business need, statutory and legislative requirements.

1.7. Records management principles

The following principles will drive activities relating to records management:

- Records are a **valuable resource** and must be managed as such;
- Records are maintained in accordance with **legislation**;
- Records are stored within **record keeping systems**, rather than in personal filing;
- Records are **shared** and **not duplicated**;
- Records are stored in a **consistent** manner that reflects the functions of the Board;
- Records are appropriately **secured**;
- Records are easily **accessible** for as long as they are required;
- Records that are identified as **vital** are **protected**;
- Records that are identified as of **historical significance** are **preserved**;
- Records are **disposed of** in accordance with approved Records Retention Schedules;
- Records management procedures are understood by all staff and staff are appropriately **trained**;
- Records are created, stored and managed **electronically** within West Lothian Council's EDRMs unless specifically required in paper format;
- Records management is a **responsibility** of all staff;
- Records management practices **adhere to policy, procedures and standards**;
- Records keeping systems are compliant with the requirements to **manage records throughout their lifecycle**;
- Records management practices will **support the Board's values** and making best use of resources.

1.8. Records covered by this plan

In line with the Act, **all** records created in the carrying out of the Board's functions (whether directly or by third parties) are public records. Part 1, section 3.1 of the Act states that:

*“... “public records”, in relation to an authority, means—
(a) records created by or on behalf of the authority in carrying out its functions,
(b) records created by or on behalf of a contractor in carrying out the authority's functions,
(c) records created by any other person that have come into the possession of the authority or a contractor in carrying out the authority's functions.”*

1.9. Records Management systems in the Board

The Board will primarily utilise West Lothian Council's Electronic Document and Records Management System (EDRMs). Other information relating to the Board is managed within West Lothian Council's [Committee Information System](#).

All records of the Board are identified within the business classification scheme and are subject to West Lothian Council's [Records Management Policy](#), procedures and guidelines.

2. Elements of the Plan

2.1. Element 1: Senior Management Responsibility

Senior Management responsibility for the Records Management Plan lies with **Jim Forrest, Director of West Lothian Community Health Partnership**. For enquiries relating to the Records Management Plan please contact:

The Customer Service Centre
West Lothian Council
West Lothian Civic Centre
Howden South Road
Livingston
West Lothian EH54 6FF
Tel: 01506 280000
Email: customer.service@westlothian.gov.uk

2.2. Element 2: Records Management Responsibility

The point of contact for the operation of records management within the council is **Carol Dunn, Records Manager**. For enquiries relating to the operational aspects of Records Management please contact:

The Customer Service Centre
West Lothian Council
West Lothian Civic Centre
Howden South Road
Livingston
West Lothian EH54 6FF
Tel: 01506 280000
Email: customer.service@westlothian.gov.uk

2.3. Element 3: Records Management Policy Statement

The Board has committed to the effective management of records and has adopted West Lothian Council's [Records Management Policy](#) as the basis to its records management policy arrangements. This is subject to ongoing monitoring and annual review.

West Lothian Council's guidelines and procedures are adopted as the standard for the management of Board records and are made readily available to all staff. This is supported by online training in the management and handling of records.

2.4. Element 4: Business Classification

The Board have adapted the Local Government Classification Scheme (LGCS) as a basis to its business classification scheme. The LGCS is developed in a structure that supports the business activities of the authority. The LGCS hierarchy is structured in three tiers:

- Level 1: functions
- Level 2: activities
- Level 3: transactions

This has been expanded to include further levels (levels 4-6) detailing sub-groupings of records types and years. The deployment of EDRMs has required that file plans are developed to accommodate strict security models, whilst facilitating information sharing and the application of disposal schedules. The Board have implemented a file plan for the capture and management of electronic records in West Lothian Councils Electronic

Documents and Records Management System (EDRMs). The EDRMs is compliant with the European MoReq2 standard for the collection of information within records management systems. Read more about MoReq2 at <http://www.moreq2.eu/fags>.

The Board are supported by an 'Information Liaison Officer' who manages and maintains the Board's local file plan.

2.5. Element 5: Retention Schedules

The Board have adopted the Scottish Council for Archives Records Retention Schedule (SCARRS) model as the basis to their approved retention schedules. These retention schedules are endorsed by the Board and applied to all records.

More information on SCARRS can be found on the Scottish Archives website: <http://www.scottisharchives.org.uk/projects/toolsstandards/retentionschedules>

The Archives service of West Lothian Council provides a centralised resource for long-term storage of both operational records (non-current) and preservation of historical records. This resource manages the retention and disposal of these records and works with the Board to identify records for archival, preservation or destruction.

Standards for records retention are built into contracts and agreements with third parties who share or process information on the Board's behalf.

2.6. Element 6: Destruction Arrangements

Where required, the Board use the contracts of West Lothian Council for the bulk destruction of paper records and IT equipment containing electronic records.

Data Solutions 2016 Ltd - Provides a confidential shredding service for paper records

CCL North Ltd – Provides a secure hardware destruction service (to UK Government standards). Company website: <http://www.cclnorth.com/secure-data-destruction.html>

In addition, the Board use on site shredders which ensure that paper and optical media is destroyed to European security standards (2 x 15 mm particles).

Standards for records destruction arrangements are built into contracts and agreements with third parties who handle or process records on the Board's behalf.

2.7. Element 7: Archiving and Transfer Arrangements

The Board utilise West Lothian Council's in-house archive facility that provides for preservation of both historical and long-term operational records. Archiving and transfer arrangements are detailed within Council policies, procedures and guidelines and within the Boards approved records retention schedules.

More information on the council's Archives service is available on the council's website:
<https://www.westlothian.gov.uk/article/2052/Archives>

Link to the council's Archives and Records Management Policy on the council's website:
<https://www.westlothian.gov.uk/media/4292/Archives-and-Records-Management-Policy/pdf/archivesandrecordsmanagementpolicy.pdf>

2.8. Element 8: Information Security

The Board have adopted West Lothian Council's [Information Security Policy](#), procedures and processes, including, the councils [Information Handling Procedure](#). These are in place to deal with threats, risks and breaches of security.

The council operate an Information Security Management System (ISMS) in accordance with the international standard ISO27001. The council's Information Security Policy complies with this standard and provides a framework for all services.

All staff receive information security awareness training and are reminded of the importance of security via direct emails and local awareness sessions.

Compliance with security requirements is assessed and reviewed as per the governance model described in Element 13.

More information on ISO27001 can be found on the British Standards Institute website.
<http://www.bsigroup.co.uk/en-GB/iso-27001-information-security/>

2.9. Element 9: Data Protection

The Data Protection Act 2018 regulates the processing of personal data by the Board. The act gives individuals various rights over how their data is gathered and used by the Board.

The Board has put a number of safeguards in place to ensure that:

- we only gather as much information as we need, and no more;
- the information is accurate and up-to-date;
- the information is only used for the purpose intended;
- we only keep the information only as long as we need to.

The Board holds and maintains limited information relating to officer positions and their register of interests. The Board may also process personal records of other individuals to:

- oversee the provision of delegated health and social care services in our area,
- maintain accounts and records,
- promote services,
- undertake research,
- support and manage employees,
- administer the Board

The Board has adopted West Lothian Council's [Data Protection Policy](#) and associated procedures and guidance for the management and handling of personal data. The Policy is subject to regular review. All officers are required to undertake data protection and information security training to ensure that personal data is processed in accordance with the data protection principles.

XXXX will act as the Board's Data Protection officer and has responsibility for data protection compliance.

2.10. Element 10: Business Continuity and Vital Records

The Board have identified their vital records through the business classification schemes (file plans) and, where required, the paper inventory.

This feeds the Business Continuity and Disaster Recovery planning process for the Board.

2.11. Element 11: Audit Trail

West Lothian Council's EDRMs (Electronic Documents and Records Management System) provides electronic audit trails as evidence of viewing, modifying, and deletion of records.

IT systems and databases provide audit logs that record usage and updates to records.

Where paper records of an operational nature are maintained on site these are identified within the paper records inventories. Movement of these paper records are controlled through a method of check-out/in deployed by the Board.

In addition, archiving procedures ensure that paper records are tracked from local storage to long term archive/preservation.

2.12. Element 12: Competency framework for Records Mgt Staff

The Board is supported by staff who have specific responsibilities for information Management and Records Management. Role descriptions are available for West Lothian Council's Records Manager and Archivist and Records Manager(s), and the Boards Information Liaison Officer.

All council staff supporting the Board must complete the council's mandatory online training in Information Security Awareness, Data Protection, Freedom of Information and Records Management. Access to record keeping systems is revoked for staff who do not complete this training.

2.13. Element 13: Assessment and Review

The Boards Records Management Plan is subject to standard governance, monitoring and review processes. The plan is formally audited and reviewed on an annual basis.

Formal governance over this plan is set out in the table below.

Governance		
Group	Governance/Scrutiny Role	Reporting Frequency
West Lothian Integration Joint Board Audit Risk and Governance Committee	Developing the Board's framework of governance, risk management and internal control. Full details of the Committee Remit can be found here: Committee Remit	Quarterly

West Lothian Integration Strategic Planning Group	Developing and overseeing, monitoring and reviewing the strategic plan for the IJB. Providing advice on Scottish Government policy and regulations. Terms of Reference	Every 2 months
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The Board monitor, audit and, where required, make improvements on an ongoing basis. Plans are put in place for the continued development and improvement of records management practice in each area.

2.14.Element 14: Shared Information

The Board have identified all instances of information sharing requirements and where information is shared with or processed by a third party. This is governed by the council's Data Sharing Code of Practice and in agreements with third parties such as Data Sharing Agreements, Data Processing Agreements and Data Processing Information Handling Standards. MOU? Integration Joint Board Terms of Reference etc.?