



Records Management Plan of North Lanarkshire Integration Joint Board

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

Document Control

Organisation	North Lanarkshire Integration Joint Board
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Document Amendment History

Revision No.	Originator of Change	Date of Change	Change Description
1.0	Fiona Hughes	25/06/2020	First Records Management Plan created under the Act

Introduction

About North Lanarkshire Integration Joint Board

North Lanarkshire Integration Joint Board (“IJB”) was established under the Public Bodies (Joint Working) (Scotland) Act 2014. The IJB was formally established on 1st April 2016.

The IJB became responsible for the planning and oversight of delivery of health and social care functions, delegated to it by NHS Lanarkshire & North Lanarkshire Council. Functions include Adult Social Work & Social Care Services, Community Health and Social Care Services for Children and Adults and some hospital services. The area covered by the IJB is coterminous with North Lanarkshire Council and is divided into six localities.

The IJB operates as a separate legal entity from NHS Lanarkshire and North Lanarkshire Council. The IJB is made up of eight voting members appointed in equal number by NHS Lanarkshire and North Lanarkshire Council, with a number of representative members drawn from other sectors, including the independent and third sectors, and to represent other stakeholders including staff, carers, service users and professional advisors as set out in the Public Bodies (Joint Working) (Scotland) Act 2014.

The key IJB functions are to:

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

The IJB recognises the importance information and recordkeeping plays in underpinning its over-arching strategic objectives and helping it to meet national and local outcomes.

The Public Records (Scotland) Act 2011

The Public Records (Scotland) Act 2011 (‘the Act’) came into force in January 2013. The Act obliges the IJB and other public authorities to prepare and implement a Records Management Plan (“the Plan”). The Plan sets out proper arrangements for the management of records within the IJB.

The Plan is based on the Keeper’s published Model Records Management Plan, as revised in 2019, and addresses the 15 elements as laid out in the Model Plan:

Element 1: Senior management responsibility

Element 2: Records manager responsibility

Element 3: Records management policy statement

Element 4: Business classification

Element 5: Retention schedules

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: tracking and version control
- Element 12: Records management training for staff
- Element 13: Assessment and review
- Element 14: Shared information
- Element 15: Public records created by third parties

The Plan relates to all public records created or managed by the IJB, whether electronic or physical. The public records of the IJB constitute an auditable account of the authority's activities, which provides evidence of the business, actions and decisions approved by the IJB.

The IJB's public records are initially created on the systems of NHS Lanarkshire ("NHSL") and by the staff of NHSL. They are subsequently stored on the systems of North Lanarkshire Council ("the Council") by the staff of the Council.

This Plan therefore reflects both the NLC Records Management Plan ("NLC RMP") and the NHSL Records Management Plan ("NHSL RMP"), both of which were previously approved on an improvement model basis by the Keeper.

Effective management of information and records supports efficiency, consistency and business continuity within an organisation. It ensures that the correct information is captured, stored, maintained and used, then destroyed or preserved in accordance with business need as well as statutory and legislative requirements.

The following Plan demonstrates the commitment of the IJB to continuous improvement in the way in which it manages and uses its records.

Element 1: Senior management responsibility

An individual senior staff member is identified as holding corporate responsibility for records management.

The Act specifically requires a Records Management Plan to identify the individual responsible for the management of the authority’s public records.

1. Statement of Compliance

- a. The confirmation of senior management responsibility is mandatory under the Act. The senior officer with strategic responsibility for records management for the IJB is:

Ross McGuffie
Chief Officer
North Lanarkshire Council,
Civic Centre,
Windmillhill Street,
Motherwell, ML1 1AB

- b. As recognition of the importance of senior management role in promoting good records management practice, the Chief Officer fully endorses the Plan and takes senior responsibility for implementation of the records management procedures detailed in the Plan.
- c. The Chief Officer acknowledges that IJB records are created on both NLC and NHSL systems by both NLC and NHSL staff and they are stored on NLC systems by NLC staff and that compliance with the Act will therefore reflect both the NHSL RMP and the NLC RMP.

2. Evidence

001	Letter from the Chief Officer endorsing the IJB RMP, NLC AND NHSL Records Management Policy statements (see Element 3) and appointing Records Managers (see Element 2)
002	NLC RMP
003	NHSL RMP

Individual staff members are identified as holding operational responsibility for records management and have appropriate corporate responsibility, access to resources and skills.

The Act specifically requires a Plan to identify the individual responsible for ensuring the authority complies with its plan.

1. Statement of Compliance

- a. The NLC officer with operational responsibility for records management where IJB records are created or stored on NLC systems is:

Fiona Hughes

Corporate Records Manager
North Lanarkshire Heritage Centre
High Road
Motherwell
ML1 3HU

- b. The NHSL officer with operational responsibility for records management where IJB records are created on NHSL systems is:

Paul Cannon

Board Secretary
Kirklands Hospital
Fallside Road
G71 8BB

- c. The NLC Corporate Records Manager acts as the Keeper's initial point of contact with the IJB;

2. Evidence of Compliance

001	Letter from the Chief Officer
002	NLC RMP
003	NHSL RMP

The authority has an appropriate policy statement on records management.

1. Statement of Compliance

- a. As the public records of the IJB are managed on both NLC and NHSL systems, they are managed according to the records management policy statements of both organisations.
- b. The IJB has approved and adopted the policy statements of both authorities and applies them, as appropriate, to the different stages of the life-cycle of their public records.

2. Evidence of Compliance

002	NLC RMP
003	NHSL RMP
004	NLC Records and Information Management Policy
005	NHSL Administrative Records Policy

Records are known and are identified within a structure, ideally founded on function.

1. Statement of Compliance

- a. The papers of the IJB are held on the NLC committee management system (MARS) that is hosted on NLC servers. They are arranged chronologically, by meeting, and can be viewed on the NLC public facing website. They are searchable by keyword or date.
- b. Freedom of Information requests to the IJB are managed by the NLC Freedom of Information team and are held alongside NLC requests.
- c. No complaints have been received by the IJB to date however arrangements are in place for any complaints to be managed by Health & Social Care in NLC and stored alongside Health & Social Care complaints.

2. Evidence of Compliance

002	NLC RMP
006	NLC File plan with IJB Highlighted
007	IJB papers on MARS - NLC website screenshot

Records are retained and disposed of in accordance with the Retention Schedule

1. Statement of Compliance

- a. The public records of the IJB are stored on NLC systems by NLC staff. The IJB has therefore adopted the retention schedule of NLC which is based on SCARRS and is regularly reviewed by the NLC records manager. Provision is in place for retaining the IJB papers permanently for evidential purposes whereas the complaints and FOI requests, that contain personal information, are destroyed within agreed timescales.
- b. Lines have been added into the NLC retention schedules to demonstrate the approach taken by the IJB and this has been approved by the NLC Information Management Working Group.

2. Evidence of Compliance

002	NLC RMP
009	NLC retention schedule (05.01.08, 17.01.05 and 17.01.06)

Records are destroyed in a timely and appropriate manner and records of their destruction are maintained.

1. Statement of Compliance

- a. The IJB is responsible for very few non-electronic public records. Any public records that the IJB is responsible for would be destroyed according to the NLC standards for secure destructions as outlined in the NLC RMP.

- b. The IJB's records are stored on NLC systems and destructions are completed in accordance with the standards outlined in Element 6 of the NLC RMP. This includes continuity backups, destruction cycles of backups, disposal of hardware and destructions according to retention schedules.

2. Evidence of Compliance

002	NLC RMP
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Records that have enduring value are permanently retained and made accessible in accordance with the Keeper’s ‘Supplementary Guidance on Proper Arrangements for Archiving Public Documents’.

1. Statement of Compliance

- a. North Lanarkshire Council’s archive collections are managed on behalf of the Council by the Archives service within CultureNL Ltd. Policies and procedures of the Archives service are outlined in the NLC RMP.
- b. IJB papers of enduring value are stored in the Council’s committee paper management system with permanent retention assigned to them. These will be held in this system, which has disaster recovery measures in place, until a method of permanent preservation of electronic records has been identified within NLC.
- c. Any other public records of enduring evidential, historical, cultural or research value will be offered to the Archivist once it is no longer required for business purposes, as outlined in the NLC RMP.
- d. The North Lanarkshire Archives Collection Policy will be updated to demonstrate inclusion of the IJB at its next review.

2. Evidence of Compliance

002	NLC RMP
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Records are held in accordance with information security compliance requirements.

1. Statement of Compliance

- a. NLC operates an Information Security Management System in accordance with the international standard ISO27001. The Council’s Information Security Policy and Acceptable Use of ICT Policy comply with this standard.

Details of procedures in place and measures to ensure staff comply are detailed in the NLC RMP. The IJB subscribes to this for the Papers that it stores on NLC systems.

- b. NHS Lanarkshire operates an Information Security Management System in accordance with the international standard ISO27001. The ISMS comprises a broad range of policies and procedures which are aligned to Cyber Essential + and the Network and Information Systems (NIS) Directive.
- c. Details of procedures in place and measures to ensure staff comply are detailed in the NHS Lanarkshire RMP and the ISMS.
- d. The Information Governance Committee within NHS Lanarkshire oversees the management of Data Protection, Information Security including Cyber Security and the Records Management Plan.

2. Evidence of Compliance

002	NLC RMP
003	NHSL RMP

Records involving personal data are managed in compliance with data protection law.

1. Statement of Compliance

- a. The IJB is a data controller.
- b. The Head of Legal & Democratic Solutions in North Lanarkshire Council acts as the Data Protection Officer for the IJB and has responsibility for monitoring data protection compliance in the organisation.
- c. The IJB follows the NLC Data Protection Policy which sets out its obligations with regards to the requirements of the General Data Protection Regulation and the Data Protection Act 2018. The Policy is reviewed on a bi-annual basis as part of the Council's Information Governance Framework.
- d. The NLC [data protection page](#) provides a link to the mailbox of the Data Protection Officer in respect of Subject Access Requests, which would facilitate responses to SARs relating both to the Council and the IJB. The NLC Privacy statement is also available on the this page. Work is currently underway in refining documents that are more specific to the IJB.
- e. All NLC 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. This is outlined more fully in the NLC RMP.
- f. The Information Governance Manager acts as the Data Protection Officer and responsibility for monitoring data protection compliance within NHSL.
- g. A Data Protection Notice for patients and staff is available on the NHSL public website.
- h. All staff within NHS Lanarkshire are required to undertake data protection training both at induction and via an online training tool.

Evidence of Compliance

002	NLC RMP
003	NHSL RMP
009	NLC Data Protection Policy v5.0
010	Minute appointing NLC Data Protection Officer as IJB Data Protection Officer

Element 10: Business continuity and vital records

Record recovery, prioritising vital records, is an integral part of the authority’s business continuity planning.

1. Statement of Compliance

- a. The NLC RMP outlines business continuity and contingency planning procedures in place for NLC systems. The IJB stores its finalised electronic records on NLC systems.
- b. The IJB notes that while it does not generate a significant amount of records, they are all considered to be Vital Records. The records are backed up as described in the NLC RMP. They are also available on the NLC website via public networks in the event that the corporate network is unavailable.

2. Evidence of Compliance

002	NLC RMP
007	IJB papers on MARS - NLC website screenshot

Element 11: Audit trail: Tracking and version control

The location of records is known and changes recorded.

1. Statement of Compliance

- a. Where IJB papers are created on NHSL systems, they are saved in PDF format, given an agenda number for version control and emailed directly from the NHSL system to the NLC system.
- b. Where the IJB paper has been deferred from a Council committee, it retains its original committee headings and reference numbers and is then added to the relevant IJB agenda.
- c. All IJB papers are uploaded to MARS and stored as a permanent record as outlined in Element 7.

2. Evidence of Compliance

002	NLC RMP
003	NHSL RMP

Staff creating, or otherwise processing records, are appropriately trained and supported.

1. Statement of Compliance

- a. The NLC RMP outlines CPD arrangements for the NLC Records Manager and its Records Management and Archives Team.
- b. The NLC RMP outlines the training, guidance and awareness campaigns in place for NLC staff in Information Security, Data Protection and Records and Information Management.
- c. The NHSL RMP outlines training and guidance arrangements that are in place for NHSL staff in Records, Management, Safe Handling of Information and Information Security.

2. Evidence of Compliance

002	NLC RMP
003	NHSL RMP

Records Management arrangements are regularly and systematically reviewed with actions taken when required.

1. Statement of Compliance

- a. The IJB is committed to reviewing its records management arrangements and adopts the assessment and review arrangements put in place by the NLC RMP in relation to all IJB records created and stored on NLC systems.
- b. The IJB will also adopt the assessment and review arrangements put in place in the NHSL RMP in relation to the creation of IJB records in NHSL systems.

2. Evidence of Compliance

002	NLC RMP
003	NHSL RMP

Information sharing, both within the Authority and with other bodies or individuals, is necessary, lawful and controlled.

1. Statement of Compliance

- a. The IJB does not regularly share personal information with third parties however an Information Sharing Agreement exists between the IJB, NLC and NHSL to support strategic planning or processing of NLC and NHSL information by the IJB.
- b. Additional Information Sharing Agreements will be drawn up as necessary for sharing information with third parties.

2. Evidence of Compliance

011	Information Sharing Agreement
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Element 15: Public records created or held by third parties

Adequate arrangements must be in place for the management of records created and held by third parties who carry out any functions of the authority.

1. Statement of Compliance

- a. The IJB does not make direct arrangements with third parties to carry out functions on its behalf, other than NLC and NHSL. NLC and NHSL carry out functions as directed by the IJB in accordance with their respective Records Management Plans.
- b. NLC and NHSL may make arrangements with third parties to carry out functions on behalf of the IJB. They will do this in accordance with their respective Records Management Plans.

2. Evidence of Compliance

002	NLC RMP
003	NHSL RMP