



Aberdeen City Health & Social Care Partnership
A caring partnership



RECORDS MANAGEMENT PLAN

Aberdeen City Integration Joint Board

Aberdeen City Integration Joint Board
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About the Public Records (Scotland) Act 2011

In order to improve the quality of record keeping by named Scottish public authorities, the Public Records (Scotland) Act 2011 (PRSA) came into force on the 1st January 2013, and requires the Aberdeen City Integration Joint Board to submit a Records Management Plan (RMP). This must be agreed by the Keeper of the Records of Scotland and must clearly set out proper arrangements for the way an authority manages public records, created in any format, when performing its functions.

This document is the Records Management Plan of Aberdeen City Integration Joint Board and is to be submitted to the Keeper of the Records of Scotland in April 2019.

About the Aberdeen City Integration Joint Board

The Public Bodies (Joint Working) (Scotland) Act 2014 provides a framework for the effective integration of adult health and social care services. Its policy ambition is to:

“...improve the quality and consistency of services for patients, carers, service users and their families; to provide seamless, joined-up quality health and social care services in order to care for people in their own homes or a homely setting where it is safe to do so; and to ensure resources are used effectively and efficiently to deliver services that meet the increasing number of people with longer term and often complex needs, many of whom are older.”

To realise this ambition, the Aberdeen City Health and Social Care Partnership (the Integration Authority) was established with a remit to engage with the people who use our services, their carers, our workforce, the third and independent sectors and community representatives in the planning and delivery of integrated adult health and social care services that will make a positive difference to the health and wellbeing of our City's population.

The Aberdeen City Health & Social Care Partnership is overseen by the Aberdeen City Integration Joint Board. Operational services as delegated to the Aberdeen City Health & Social Care Partnerships are overseen by the respective Records Management Plans of Aberdeen City Council and NHS Grampian. Management of these records will conform to these Records Management Plans.

This Records Management Plan relates to the records of the Aberdeen City Integration Joint Board. The Aberdeen City Integration Joint Board create a small number of records in relation to its function as a Board (for example, data relating to the Strategic Plan, Board & Committee papers and minutes; and correspondence by the Chief Officer, Chief Finance Officer and Clinical Director (GP)). It has been determined that all IJB records are held electronically.



The Plan

The scope of the Plan applies to all records irrespective of age, format, the technology used to create and store them, or the type of information they contain.

Each section lists evidence in support of the Aberdeen City Integration Joint Board's activities. Where relevant, details of further development work to deliver the necessary requirements of the Act are outlined. The evidence package is included in Appendix 1.

This plan will be reviewed every year (or sooner if new legislation, codes of practices or national standards are to be introduced).

Record Management Plan Elements

The RMP sets out the overarching framework for ensuring that IJB records are managed and controlled effectively.

The RMP considers all 14 elements as advised in the Keeper's Model RMP and supporting guidance material. The 14 elements are:

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

RMP Element Description	Aberdeen City Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p>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.</p> <p>It is vital that the RMP submitted by an authority has the approval and support of that authority's senior management team. Where an authority has already appointed a Senior Information Risk Owner, or similar person, they should consider making that person responsible for the records management programme. It is essential that the authority identifies and seeks the agreement of a senior post-holder to take overall responsibility for records management. That person is unlikely to have a day-to-day role in implementing the RMP, although they are not prohibited from doing so.</p> <p>As evidence, the RMP could include, for example, a covering letter signed by the senior post-holder. In this letter the responsible person named should indicate that they endorse the authority's record management policy (See Element 3).</p>	<p>The Chief Officer has senior responsibility for all aspects of the IJB's Records Management, and is the corporate owner of this document.</p> <p>The Chief Officer is also the Board's Senior Information Risk Owner (SIRO).</p> <p>The Chief Officer chairs the Leadership Team, which has strategic responsibility for the Health and Social Care Partnership.</p>	<p>IJB Decision (date)</p> <p>Covering letter to Keeper from CO (date)</p>	<p>No further development required. Measure fully implemented and evidenced.</p>



RMP Element Description	Aberdeen City Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p>Element 2: Records manager responsibility:</p> <p>Section 1(2) (a)(ii) of the Act specifically requires a RMP to identify the individual responsible for ensuring the authority complies with its plan. An authority's RMP <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.</p>	<p>The Operational Officer responsible for records management is the Aberdeen City HSCP's Business Manager.</p> <p>Responsibilities include:</p> <ul style="list-style-type: none"> • 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, where required 	<p>IJB Minute (date)</p> <p>Signed MOU between ACC and IJB</p> <p>Minute of ACC Information Governance Group (date)</p> <p>Covering letter to Keeper from CO</p>	



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<p>Element 3: Records management policy statement:</p> <p>The Keeper expects each authority's plan to include a records management policy statement. The policy statement should describe how the authority creates and manages authentic, reliable and useable records, capable of supporting business functions and activities for as long as they are required. The policy statement should be made available to all staff, at all levels in the authority. The statement will properly reflect the business functions of the public authority. The Keeper will expect authorities with a wide range of functions operating in a complex legislative environment to develop a fuller statement than a smaller authority. The records management statement should define the legislative, regulatory and best practice framework, within which the authority operates and give an overview of the records management processes and systems within the authority and describe how these support the authority in carrying out its business effectively. For electronic records the statement should describe how metadata is created and maintained. It should be clear that the authority understands what is required to operate an effective records management system which embraces records in all formats.</p> <p>The records management statement should include a description of the mechanism for records management issues being disseminated through the authority and confirmation that regular reporting on these issues is made to the main governance bodies. The statement should have senior management approval and evidence, such as a minute of the management board recording its approval, submitted to the Keeper. The other elements in the RMP, listed below, will help provide the Keeper with evidence that the authority is fulfilling its policy.</p>	<p>The IJB approved the Records Management Policy on (date). This is a broad statement of intent documenting the IJB's approach to records management through reference to legislation and good records management principles.</p> <p>The context of this plan is that IJB records will be managed by Aberdeen City Council and as such will be covered by their records management policies and protocols. To support this, a memorandum of understanding is in place.</p>	<p>IJB Records Management Policy</p> <p>Minute of IJB (date)</p> <p>MOU</p>	



RMP Element Description	Aberdeen City Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p>Element 4: Business classification</p> <p>The Keeper expects an authority to have properly considered business classification mechanisms and its RMP should therefore reflect the functions of the authority by means of a business classification scheme or similar.</p> <p>A business classification scheme usually takes the form of a hierarchical model or structure diagram. It records, at a given point in time, the informational assets the business creates and maintains, and in which function or service area they are held. As authorities change the scheme should be regularly reviewed and updated.</p> <p>A business classification scheme allows an authority to map its functions and provides a structure for operating a disposal schedule effectively.</p> <p>Some authorities will have completed this exercise already, but others may not. Creating the first business classification scheme can be a time-consuming process, particularly if an authority is complex, as it involves an information audit to be undertaken. It will necessarily involve the cooperation and collaboration of several colleagues and management within the authority, but without it the authority cannot show that it has a full understanding or effective control of the information it keeps.</p> <p>Although each authority is managed uniquely there is an opportunity for colleagues, particularly within the same sector, to share knowledge and experience to prevent duplication of effort.</p> <p>All of the records an authority creates should be managed within a single business classification scheme, even if it is using more than one record system to manage its records. An authority will need to demonstrate that its business classification scheme can be applied to the record systems which it operates.</p>	<p>The IJB has developed a Business Classification Scheme (BCS) modelled on the BCS format used by Aberdeen City Council which identifies the classes of its records through functions and transactions.</p>	<p>IJB Business Classification Scheme</p> <p>IJB Minute (date)</p> <p>IGG Minute (date)</p>	



RMP Element Description	Aberdeen City Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p>Element 5: Retention schedules</p> <p>Section 1(2) (b)(iii) of the Act specifically requires a RMP to include provision about the archiving and destruction or other disposal of the authority’s public records.</p> <p>An authority’s RMP <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).</p> <p>The principal reasons for creating retention schedules are:</p> <ul style="list-style-type: none"> • to ensure records are kept for as long as they are needed and then disposed of appropriately • to ensure all legitimate considerations and future uses are 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. <p>“Disposal” in this context does not necessarily mean destruction. It includes any action taken at the agreed disposal or review date including migration to another format and transfer to a permanent archive.</p> <p>A retention schedule is an important tool for proper records management. Authorities who do not yet have a full retention schedule in place should show evidence that the importance of such a schedule is acknowledged by the senior person responsible for records management in an authority (see element 1). This might be done as part of the policy document (element 3). It should also be made clear that the authority has a retention schedule in development.</p> <p>An authority’s RMP <u>must</u> demonstrate the principle that retention rules are</p>	<p>Day-to-day responsibility for the implementation of the IJB Records Management Plan File Plan lies with the Information Governance Team of Aberdeen City Council. The memorandum of understanding sets out the relationship and governance which supports this.</p>	<p>Records Management Policy File Plan MOU ACC Document Retention Schedules and Lifecycle Protocols</p>	



consistently applied across all of an authority's record systems.			
RMP Element Description	Aberdeen City Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p>Element 6: Destruction arrangements</p> <p>Section 1(2) (b)(iii) of the Act specifically requires a RMP to include provision about the archiving and destruction, or other disposal, of an authority's public records.</p> <p>An authority's RMP <u>must</u> demonstrate that proper destruction arrangements are in place.</p> <p>A retention schedule, on its own, will not be considered adequate proof of disposal for the Keeper to agree a RMP. It must be linked with details of 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.</p>	<p>Any destruction of IJB records, in all formats, will be undertaken in accordance with Aberdeen City Council's document destruction arrangements.</p> <p>All IJB records are created and stored electronically</p>	<p>IJB File Plan MOU</p>	



RMP Element Description	Aberdeen City Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p>Element 7: Archiving and transfer arrangements</p> <p>Section 1(2)(b)(iii) of the Act specifically requires a RMP to make provision about the archiving and destruction, or other disposal, of an authority’s public records.</p> <p>An authority’s RMP <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.</p> <p>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.</p>	<p>IJB records are stored and maintained through Aberdeen City Council’s records management systems</p> <p>The Business Classification Scheme and File Plan identify the nature of the records the IJB creates and holds. The memorandum of understanding .provides the framework in which ACC policy towards archiving and transfer will apply to IJB records within the context of the Records Management Policy.</p>	<p>MOU</p> <p>IJB Business Classification Scheme</p> <p>IJB File Plan</p> <p>IGG Minute</p> <p>IJB Minute</p>	



RMP Element Description	Aberdeen City Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p>Element 8: Information Security</p> <p>Section 1(2) (b)(ii) of the Act specifically requires a RMP to make provision about the archiving and destruction or other disposal of the authority's public records.</p> <p>An authority's RMP <u>must</u> make provision for the proper level of security for its public records.</p> <p>All public authorities produce records that are sensitive. An authority's RMP <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.</p> <p>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.</p>	<p>The IJB will follow and comply with Aberdeen City Council policy and procedures in terms of arrangements for the security for systems, devices, information sharing platforms etc.</p> <p>All staff that work with IJB records will remain employees of either Aberdeen City Council or NHS Grampian. As such they will be subject to the policies and procedures of their employer, i.e. Aberdeen City Council Information Security policies or NHS Grampian Information Security Policies.</p>	<p>ACC Information Security Policy</p> <p>NHSG Information Security Policy</p>	



RMP Element Description	Aberdeen City Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p>Element 9: Data protection</p> <p>The Keeper will expect an authority's RMP to indicate compliance with its data protection obligations. This might be a high level statement of public responsibility and fair processing.</p> <p>If an authority holds and 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.</p>	<p>The Records Management Policy sets out the IJB commitment to data protection.</p> <p>IJB Data Protection Officer</p>	<p>IJB Privacy Notice and Council & NHS Data Sharing agreement.</p>	



RMP Element Description	Aberdeen City Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p>Element 10: Business continuity and vital records</p> <p>The Keeper will expect an authority's RMP to indicate arrangements in support of records vital to business continuity. Certain records held by authorities are vital to their function. These might include insurance details, current contract information, master 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.</p> <p>Authorities should therefore have appropriate business continuity plans ensuring that the critical business activities referred to in their vital records will be able to continue in the event of a disaster. How each authority does this is for them to determine in light of their business needs, but the plan should point to it.</p>	<p>IJB's records are managed in accordance with the Council's Business Continuity and vital records arrangements.</p> <p>Although we do not keep paper records we do have a plan for business continuity for identified IJB vital records. This includes copies of:</p> <ul style="list-style-type: none">• Integration Scheme• Strategic Plan• List of membership and relevant contact numbers• Business Continuity Plan	<p>Electronic information is held on Council IT systems which are supported by off-site backup and in some cases also by disaster recovery capabilities.</p> <p>Access to NHSG BCP Documents?</p>	



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RMP Element Description	Aberdeen City Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p>Element 11: Audit trail</p> <p>The Keeper will expect an authority's RMP to provide evidence that the authority maintains a complete and accurate representation of all changes that occur in relation to a particular record. For the purpose of this plan 'changes' can be taken to include movement of a record even if the information content is unaffected. Audit trail information must be kept for at least as long as the record to which it relates.</p> <p>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.</p>	<p>All IJB records with an ongoing lifecycle are subject to a review protocol. Examples would include the Strategic Plan, the Strategic Risk Register and all policies approved by the IJB.. These review protocols are routinely annual and are documented as a new record is created. All these records are reported through the ACC Committee management process and retained and stored according to the ACC records management protocols</p>	<p>ACC Records Management Policy and Plan</p>	



RMP Element Description	Aberdeen City Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p>Element 12: Competency framework for records management staff</p> <p>The Keeper will expect an authority's RMP to detail a competency framework for person(s) designated as responsible for the day-to-day operation of activities described in the elements in the authority's RMP. It is important that authorities understand that records management is best implemented by a person or persons possessing the relevant skills.</p> <p>A competency framework outlining what the authority considers are the vital skills and experiences needed to carry out the task is an important part of any records management system. If the authority appoints an existing non-records professional member of staff to undertake this task, the framework will provide the beginnings of a training programme for that person.</p> <p>The individual carrying out day-to-day records management for an authority might not work for that authority directly. It is possible that the records management function is undertaken by a separate legal entity 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.</p>	<p>Training for staff who have records management roles or undertake records management activities remains the responsibility of the employing bodies Aberdeen City Council and NHS Grampian</p> <p>Staff who are managing IJB records are employed by either Aberdeen City Council or NHS Grampian, and have received the relevant training for their role.</p>	<p>ACC Records Management Plan</p> <p>NHSG Records Management Plan</p> <p>Annual Assurance Statement that relevant staff have undertaken training?</p>	



RMP Element Description	Aberdeen City Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p>Element 13: Assessment and review</p> <p>Section 1(5) (i)(a) of the Act says that an authority must keep its RMP under review.</p> <p>An authority's RMP <u>must</u> describe the procedures in place to regularly review it in the future.</p> <p>It is important that an authority's RMP is regularly reviewed to ensure that it remains fit for purpose. It is therefore vital that a mechanism exists for this to happen automatically as part of an authority's internal records management processes.</p> <p>A statement to support the authority's commitment to keep its RMP under review must appear in the RMP detailing how it will accomplish this task.</p> <p>Read further explanation and guidance about element 13 – http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement13.asp</p>	<p>The IJB will undertake an annual review of the RMP which will be documented and recorded through the ACC Committee management process.</p> <p>Any proposed changes will also be reported through the ACC Information Governance Group to ensure all proposed changes are in accordance with ACC policies and procedures and that the Memorandum of Understanding is still validated.</p>	<p>Minutes of IJB meetings</p> <p>Minutes of IGG meetings</p>	



RMP Element Description	Aberdeen City Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p>Element 14: Shared Information</p> <p>The Keeper will expect an authority's RMP to reflect its procedures for sharing information. Authorities who share, or are planning to share, information must provide evidence that they have considered the implications of information sharing on good records management.</p> <p>Information sharing protocols act as high level statements of principles on sharing and associated issues, and provide general guidance to staff on sharing information or disclosing it to another party. It may therefore be necessary for an authority's RMP to include reference to information sharing protocols that govern how the authority will exchange information with others and make provision for appropriate governance procedures.</p> <p>Specifically the Keeper will expect assurances that an authority's information sharing procedures are clear about the purpose of record sharing which will normally be based on professional obligations. The Keeper will also expect to see a statement regarding the security of transfer of information, or records, between authorities whatever the format.</p>	<p>Information is held by the Council, Health Board and IJB.</p> <p>Data sharing agreements are in place and new ones are planned on specific areas including sharing of performance information at a granular level to support forward planning.</p>	<p>All Data Sharing Agreements</p>	<p>.</p>