

## Aberdeen City Health and Social Care Records Management Plan-Improvement Plan - Appendix A

Element	The Keeper of the Records of Scotland's comments	Aberdeen City Health and Social Care Partnership's Planned actions
4. Business Classification	<p>The Keeper of the Records of Scotland (the Keeper) expects that the public records of an authority are known and are identified within a structure.</p> <p>It has been determined that all IJB records are held electronically. Although the public records of the IJB are held on the records management systems of Aberdeen City Council, the IJB has created a separate business classification scheme and file plan covering their records. Copies of these documents have been provided to the Keeper.</p> <p>The Keeper has been provided with a minute of the meeting of the IJB dated 8th September 2020 at which the Board approved the <i>Business Classification Scheme</i>.</p> <p>The <i>File Plan</i> is designed to expand the <i>Business Classification Scheme</i> to include retention information and information on the systems on which the records are managed (shared drives, business system management system etc.). This is potentially a useful business tool for the authority. <b>The IJB have confirmed to the Keeper that the File Plan is to be amended to complete all sections of the Plan and then will be further amended (as detailed below).</b></p> <p><b>Aberdeen City Council is currently consolidating their records management provision around an O365 cloud solution. It is assumed that the public records of the IJB will transition alongside the record of the Council. The</b></p>	<p>Confirmation has been sought from Aberdeen City Council as to the progress of O365 and the consolidation of ACC records. The Council's Records Manager has confirmed that the Council will submit evidence on this element to the Keeper in 2022. In the meantime, the IJB's records continue to be managed by the Council's Committee Services Management system.</p> <p>Work has been undertaken and will continue on the IJB File Plan.</p>

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	<p><i>File Plan</i> column 'location' will then require to be changed. IJB records will no longer be held on shared drives for example. Some IJB records may remain outside the principal records management solution. For example, on Council 'line-of-business' systems such as "ACC's Committee Services Management Programme". The Keeper has determined that the RAG status of a <i>Records Management Plan</i> of any authority, whose records are managed on the systems of a separate authority, cannot be higher than that awarded to the 'host' authority. As noted above, Aberdeen City Council is in a transition period and carries an amber status against this element.</p> <p>Therefore, the Keeper can agree element 4 on the same 'improvement model' terms as the Council.</p>	
5. Retention Schedule	<p>The Keeper expects an authority to have allocated retention periods to its public records and for those records to be retained and disposed of in accordance with a retention schedule.</p> <p>All the public records of the IJB are held on Aberdeen Council systems, which (as detailed under element 4 above) are currently being transitioned to an O365 solution. <b>The Keeper has agreed the Council's <i>Records Management Plan</i> on an 'improvement model' basis for this element as the operation of retention labels against record type has not been finalised in the new system.</b></p> <p>The Keeper notes that the IJB <i>File Plan</i> has appropriate retention decisions allocated to IJB public records. <b>However, see element 4 regarding the completeness of the <i>File Plan</i>.</b></p>	<p>Confirmation has been sought from Aberdeen City Council as to the progress of O365 and the consolidation of ACC records. The Council's Records Manager has confirmed that the Council will submit evidence on this element to the Keeper in 2022. In the meantime, the IJB's records continue to be managed by the Council's Committee Services Management system.</p>

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	<p>The IJB have provided the Keeper with a screenshot from the Council's Retention Schedule showing that their public records are included.</p> <p><b>In January 2015, The Keeper agreed this element of Aberdeen City Council's plan. However, he did so under 'improvement model' terms. This was in recognition of a major change in the record keeping systems at the Council (see element 4 above).</b></p> <p><b>The Keeper therefore agrees this element of the IJB Plan under the same improvement model terms as the 'host' authority.</b></p>	
9. Data Protection	<p>The Keeper expects a Scottish public authority to manage records involving personal data in compliance with data protection law.</p> <p>Aberdeen City Integration Joint Board is a data controller. This is clearly stated in the <i>Memorandum of Understanding</i>.</p> <p>The IJB is currently working with its appointed Data Protection Officer (DPO) to ensure that they fulfil all the requirements of the Data Protection Act 2018 including registration with the Information Commissioner.</p> <p>The IJB adopts the Data protection Policy of Aberdeen City Council, which the Keeper has already agreed as appropriate (2015). However, the RMP, as submitted also includes references to the data protection provision in NHS Grampian. The IJB has now committed to take out these references as they may cause confusion.</p> <p>The IJB have provided the Keeper with links to the relevant pages on the Council website. <b>The Keeper suggests that these might also be linked from the HSCP page.</b></p>	<p>Work has been undertaken to complete the registration with the Information Commissioner. Still awaiting confirmation from Commissioner on registration. Links from the Partnership's Website to the Council's Records Management pages on the Council's website will be arranged.</p>

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<b>Element</b>	<b>The Keeper of the Records of Scotland's comments</b>	<b>Aberdeen City Health and Social Care Partnership's Planned actions</b>
	<p>The Keeper can agree this element of the Aberdeen City Integration Board's Records Management Plan under improvement model terms. This means that there is an identified gap in provision, but the Keeper recognises that the IJB have put process in place (in conjunction with their DPO) to close that gap.</p>	