



**Falkirk Health and Social Care Partnership Integration  
Joint Board  
Records Management Plan**

Information and Records Management

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## **Records Management Plan**

### **Summary**

### **Policy Statement**

Falkirk Integration Joint Board is fully committed to compliance with the requirements of the Public Records (Scotland) Act 2011, which came into force on 1 January 2013. Falkirk Integration Joint 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 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) 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 Falkirk Integration Joint Board.

### **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 Act provides the legislative framework for the integration of health and social care services in Scotland.

It puts in place:

- Nationally agreed outcomes, which 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 Falkirk Integration Joint Board**

Falkirk Integration Joint Board (the Board) is responsible for the planning and oversight of delivery of health and social care integrated functions for the Falkirk area. The Board's Integration Scheme sets out the functions which are delegated by NHS Forth Valley and Falkirk Council to the Board. The Board operates as a body

corporate (a separate legal entity), acting independently of NHS Forth Valley and Falkirk Council. The Board consists of six voting members appointed in equal number by the NHS Forth Valley and Falkirk 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 record keeping 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. The Board is fully committed to creating, managing, disclosing, protecting and disposing of information effectively and legally. This is set out under the 14 elements of the plan:

- Senior management responsibility
- Records manager responsibility
- Business classification
- Retention schedules
- Destruction arrangements

- Archiving and transfer arrangements
- Information security
- Data protection
- Business continuity and vital records
- Audit trail
- Competency framework for records management staff
- Assessment and review
- Shared information

## **Review**

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

RMP Element Description	Falkirk Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p><b>Element 1: Senior management responsibility:</b></p> <p>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><a href="http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement1.asp">Read further explanation and guidance about element 1 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement1.asp</a></p>	<p>The Chief Officer, Patricia Cassidy has senior responsibility for all aspects of the Board's Records Management, and is the corporate owner of this document.</p> <p>The Chief Officer, Patricia Cassidy is also the Board's Senior Information Risk Owner (SIRO).</p> <p>The Chief Officer chairs the IJB Leadership Group which reports to the IJB.</p>	<p>The minute of the meeting of the Falkirk Integration Joint Board on 4<sup>th</sup> December 2015 agreeing the appointment of Patricia Cassidy to the position of Chief Officer.</p> <p>Letter of confirmation from Chief Officer.</p>	

RMP Element Description	Falkirk Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p><b>Element 2: Records manager responsibility:</b></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><a href="http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement2.asp">Read further explanation and guidance about element 2 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement2.asp</a></p>	<p>Suzanne O'Reilly, Records Manager at Falkirk Council and Deirdre Coyle, Head of Information Governance at NHS Forth Valley have joint operational responsibility for the IJB Records Management Plan.</p> <p>The IJB records are managed in accordance with the Falkirk Council and NHS Forth Valley's Records Management Plans.</p>	<p>Letter of confirmation from Chief Officer.</p> <p>Letter of confirmation from the partner authorities that it creates, holds and manages into disposal all the Board's records. The Board's records will be subject to the policies and procedures of the partner body or bodies. IJB officers have access to these policies and procedures and that they are inducted and trained in relation to these.</p> <p>Records Manager APDP</p>	

RMP Element Description	Falkirk Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p><b>Element 3: Records management policy statement:</b></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><a href="http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement3.asp">Read further explanation and guidance about element 3 – http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement3.asp</a></p>	<p>Administrative Records created internally by the IJB are managed on either Falkirk Council or NHS Forth Valley record keeping systems:</p> <ol style="list-style-type: none"> <li>1. NHS Forth Valley manages the IJB's responsibilities in relation to Data Protection, FOI, EIR, Complaints and Enquiry and so holds records on behalf of the IJB on these matters. It also manages the statutory performance data returned to the government and so hold records on behalf of the IJB on these matters.</li> <li>2. Decision making (08.001) records are the joint responsibility of NHS Forth Valley and Falkirk Council. Each partner manages these records on a two year cycle.</li> <li>3. All other records are the responsibility of Falkirk Council. By way of example, the IJB's Chief Officer, Senior Service Manager and Chief Finance Officer are all employed by the Council and any records created by them (eg plans, strategies, accounts) are held on Council systems on behalf of the IJB.</li> </ol> <p>The Business Classification Scheme/Retention Schedule provides a detailed of who manages each activity.</p> <p>The key functions of the IJB are to:</p> <ul style="list-style-type: none"> <li>• Prepare a plan for integrated functions that is in accordance with national and local outcomes and integration principles</li> <li>• Allocate the integrated budget in accordance with the Plan</li> </ul>	<p>Letter of confirmation from Chief Officer.</p> <p>Falkirk Council Records Management Plan</p> <p>NHS Forth Valley Records Management Plan</p> <p>IJB Business Classification and Retention Schedule.</p>	

	<ul style="list-style-type: none"> <li>Oversee the delivery of integrated services.</li> </ul>		
RMP Element Description	Falkirk Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p><b>Element 4: Business classification</b></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><a href="http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement4.asp">Read further explanation and guidance about element 4 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement4.asp</a></p>	<p>The IJB has a combined business classification scheme and retention schedule which has been arranged into functions, activities and transactions and is aligned with the Falkirk Council business classification scheme.</p> <p>The IJB oversees the delivery of integrated services. The records relating to those services are under the control and management of Falkirk Council and NHS Forth Valley.</p>	<p>Letter of confirmation from Chief Officer.</p> <p>IJB Business Classification and Retention Schedule.</p>	.

RMP Element Description	Falkirk Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p><b>Element 5: Retention schedules</b></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"> <li>• to ensure records are kept for as long as they are needed and then disposed of appropriately</li> <li>• to ensure all legitimate considerations and future uses are considered in reaching the final decision.</li> <li>• to provide clarity as to which records are still held by an authority and which have been deliberately destroyed.</li> </ul> <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. 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 consistently applied across all of an authority's record systems.</p> <p><a href="http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement5.asp">Read further explanation and guidance about element 5_- http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement5.asp</a></p>	<p>The IJB has a combined business classification scheme and retention schedule which has been arranged into functions, activities and transactions</p> <p>The IJB oversees the delivery of integrated services. The records relating to those services are under the control and management of Falkirk Council and NHS Forth Valley.</p> <p>When developing the Records Management Plan, the IJB extracted relevant records from SCARRS templates and the IJB and its partners reviewed the schedule and made necessary changes. The IJB schedule was approved by the Chief Officer.</p> <p>The IJB will review the BCS annually to ensure that the retention periods are correct for their own records and the partners will communicate any changes to their own schedules where appropriate.</p>	<p>Letter of confirmation from Chief Officer.</p> <p>IJB Business Classification and Retention Schedule.</p>	

RMP Element Description	Falkirk Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p><b>Element 6: Destruction arrangements</b></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><a href="http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement6.asp">Read further explanation and guidance about element 6 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement6.asp</a></p>	<p>IJB records are managed, stored and destroyed in accordance with the Falkirk Council and NHS Forth Valley Records Management Plans.</p>	<p>The letter of confirmation from the Chief Officer.</p> <p>Falkirk Council Records Management Plan.</p>	

RMP Element Description	Falkirk Integration Joint Board (IJB) Statement	Evidence	Further Development
<p><b>Element 7: Archiving and transfer arrangements</b></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><a href="http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement7.asp">Read further explanation and guidance about element 7- http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement7.a sp</a></p>	<p>The board and committee meeting papers of the IJB are archived in accordance with Falkirk Council's Records Management Plan (see Element 7).</p> <p>There is a formal archiving agreement between the IJB, NHS Forth Valley, Falkirk Council and Falkirk Community Trust which manages the Council's Archives. As most of the records identified as having archival or historical value are on Council Servers, it has been agreed that all records will be deposited with Falkirk Community Trust to ensure consistency of long term preservation.</p> <p>Once transferred to the Archive the preservation of the records, both paper and digital, is the responsibility of the Archivist.</p> <p>The IJB reviewed the BCS as per comment in Elements 5 and agreed with SCARRS recommended suggestions on records that are of historic/archival value. They also met with the Archivist at Falkirk Community Trust to discuss arrangements. The IJB has set up the agreement with the Archives and has met with partners to ensure they are following the BCS.</p>	<p>The letter of confirmation from the Chief Officer.</p> <p>Archiving agreements between Falkirk Council and Falkirk Community Trust.</p> <p>Detailed procedures relating to archiving and transfer arrangements are appended to the Falkirk Council Records Management Plan.</p> <p>IJB Business Classification and Retention Schedule.</p>	<p>The process for digital preservation is being reviewed and developed by the Archivist.</p> <p>We propose that explicit mention be made about provision for IJB records.</p>

RMP Element Description	Falkirk Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p><b>Element 8: Information Security</b></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 papers of the IJB itself are held and secured on Falkirk Council and NHS Forth Valley IT equipment and managed in accordance with those organisations' information security procedures.</p>	<p>The letter of confirmation from the Chief Officer.</p> <p>Procedures for information security are appended to the Falkirk Council and NHS Forth Valley Records Management Plan.</p>	

RMP Element Description	Falkirk Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p><b>Element 9: Data protection</b></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><a href="http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement9.asp">Read further explanation and guidance about element 9 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement9.asp</a></p>	<p>The Information Commissioner has confirmed that the IJB will be a data controller albeit that it will not hold any personal records of service users/patients.</p> <p>The IJB is registered with the Information Commissioner as a data controller.</p> <p>The Data Protection Officer for the IJB is Deirdre Coyle, Head of Information Governance, NHS Forth Valley.</p> <p>Online training in data protection is mandatory for all employees who handle personal data.</p>	<p>ICO Registration details.</p> <p>The letter of confirmation from the Chief Officer.</p> <p>Minute of IJB meeting on 1 June 2018 identifying Deidre Coyle as the Data Protection Officer for Falkirk IJB.</p>	

RMP Element Description	Falkirk Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p><b>Element 10: Business continuity and vital records</b></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><a href="http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement10.asp">Read further explanation and guidance about element 10 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement10.asp</a></p>	<p>The papers of the IJB itself are managed in accordance with the business continuity arrangements of Falkirk Council and NHS Forth Valley.</p>	<p>The letter of confirmation from the Chief Officer.</p> <p>Business continuity arrangements are referenced in the Falkirk Council and NHS Forth Valley's Records Management Plans.</p>	

<b>RMP Element Description</b>	<b>Falkirk Integration Joint Board (IJB) Compliance Statement</b>	<b>Evidence</b>	<b>Further Development</b>
<p><b>Element 11: Audit trail</b></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><a href="http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement11.asp">Read further explanation and guidance about element 11 - <u>http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement11.asp</u></a></p>	<p>The movement of documents is managed in accordance with the systems operated by Falkirk Council and NHS Forth Valley.</p>	<p>The letter of confirmation from the Chief Officer.</p> <p>Arrangements for audit trails are referenced in the Falkirk Council and NHS Forth Valley Records Management Plans.</p>	<p>For particular records owned by the IJB, such as the Strategic Plan, an area for improvement is the development of a naming convention.</p>

RMP Element Description	Falkirk Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p><b>Element 12: Competency framework for records management staff</b></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>Suzanne O'Reilly, Records Manager at Falkirk Council has the skills and experience to hold operational responsibility for IJB Records Management Plan. Suzanne O'Reilly has her Post Graduate Certificate in Records Management and is currently working towards her Post Graduate Diploma. She has also undertaken internal training on Records Management and Data Protection and Information Security. Her annual achievement and personal development plan (APDP) covers her role relating to the IJB Records Management Plan. Her Post Graduate Certificate, her certificate for the Data Protection and Information Security module and latest APDP are included as evidence.</p> <p>The Head of Information Governance at Forth Valley NHS, Deirdre Coyle, currently has strategic responsibility for Records Management for the Health Board and is a Fellow of the Institute of Health Records Managers, with Post Graduate qualifications in Information Governance. The Head of Health Record Services offers technical advice, and a Corporate Records Manager is currently being recruited who will assist at an operational level.</p> <p>Training in records management for IJB staff is available from Falkirk Council.</p> <p>Staff working for the IJB, have annual personal development plans and opportunities for continuous professional development. This is to ensure knowledge of key post holders is kept up to date.</p>	<p>The letter of confirmation from the Chief Officer.</p> <p>Arrangements for training staff, including a competency framework are detailed in the Falkirk Council. Records Management Plans.</p> <p>Falkirk Council Achievement and Personal Development Scheme for Records Manager (APDS).</p> <p>DP Training Certificate for Falkirk Council Records Manager</p> <p>Falkirk Council Records Manager Qualifications</p>	

RMP Element Description	Falkirk Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p><b>Element 13: Assessment and review</b></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 – <a href="http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement13.asp">http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement13.asp</a></p>	<p>Suzanne O'Reilly is currently having discussions with the IJB named person under element 2 at West Lothian Council to create a new peer review process. This new partnership will enable both plans to be evaluated by someone impartial and will ensure that what is being stated within each plan is successfully being implemented and improved where required. The IJB will benefit from their plan being scrutinised by someone that already has an insight into the requirements of PRSA and knowledge of other organisations approaches (including best practice).</p> <p>The IJB will work closely with its partners to develop this process to ensure a consistent approach and any outputs from the peer review will be discussed by the IJB and Partners. It is the intention that the Peer review will be yearly, prior to the Progress Update Review (PUR). The IJB also has a standing invitation to the Forth Valley Information Governance Group on which the IJB Records Management Plan is a standing item for discussion.</p> <p>It is hoped that the peer review process will be finalised by the end of 2020</p>	<p>The letter of confirmation from the Chief Officer.</p> <p>Forward planner for the IJB.</p>	

RMP Element Description	Falkirk Integration Joint Board (IJB) Compliance Statement	Evidence	Further Development
<p><b>Element 14: Shared Information</b></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>The papers of the IJB itself are published and may draw on data that has been previously shared e.g. performance information.</p> <p>The IJB has access to limited personal data. Where personal data is shared (e.g. in relation to complaints), a data sharing arrangement is put in place, based on the Scottish Information Sharing Toolkit (due to be updated for GDPR).</p>	<p>Data Sharing template and Guidance</p> <p>Privacy notices on Falkirk Council and NHS Forth Valley websites</p> <p>Information sharing agreement for complaints to which the parties are the IJB, the Council and the Health Board</p>	<p>Local protocols and agreements will be amended to reflect any changes necessary in light of (a) GDPR and (b) the move away from the SASPI framework.</p>