



Western Isles Integration Joint Board

Cùram Is Slàinte nan Eilean Siar

Records Management Plan

**Version 1
Draft**

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

Introduction

Records management is the systematic control of an organisation's records, throughout their life cycle, in order to meet operational business needs, statutory and fiscal requirements, and community expectations. Effective management of information allows fast, accurate and reliable access to records, ensuring the timely destruction of redundant information and the identification and protection of vital and historically important records. Effective records management involves efficient and systematic control of the creation, storage, retrieval, maintenance, use and disposal of records, including processes for capturing and maintaining evidence.

The guiding principles of records management are to ensure that information is available when and where it is needed, in an organised and efficient manner, and in a well maintained environment.

The Act makes provision about the management of public records by named public authorities. Provisions include the preparation of a Records Management Plan ('RMP') setting out and evidencing proper arrangements for the management of the authority's public records, and its submission for agreement by the Keeper. Each Board's Health Records and Corporate Records Management Policies should provide further detail concerning standards for the management of records.

Systematic management of records allows organisations to:

- ✚ know what records they have, and locate them easily
- ✚ increase efficiency and effectiveness
- ✚ make savings in administration costs, both in staff time and storage
- ✚ support decision making
- ✚ be accountable
- ✚ achieve business objectives and targets
- ✚ provide continuity in the event of a disaster
- ✚ meet legislative and regulatory requirements
- ✚ protect the interests of employees, clients and stakeholders

The PRSA defines a record as "Anything in which information is recorded in any form." A record can be recorded in computerised or manual form or in a mixture of both. Data can be held on a range of media, including text, sound, image, and/or paper. Increasingly records are being kept on electronic and document management systems. Records may include such things as hand-written notes; emails and correspondence; radiographs and other imaging records; printouts from monitoring equipment; photographs; videos; and tape-recordings of telephone conversations.

Public Records (Scotland) Act 2011 – Records Management Plan

Under the Public Records (Scotland) Act 2011 Scottish public authorities must produce and submit a records management plan setting out proper arrangements for the management of the organisation's records to the Keeper of the Records of Scotland for his agreement under Section 1 of the Public Records (Scotland) Act 2011.

Western Isles Integration Joint Board (IJB) Records Management Plan sets out the overarching framework for ensuring that the IJB records are managed and controlled effectively, and commensurate with the legal, operational and information needs of the organisation. 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

The RMP defines Western Isles Integration Joint Board Action Plan for improving the quality, availability and effective use of records in the IJB and provides a strategic framework for all records management activities.

Western Isles Integration Joint Board Records Management Plan is effective from April 2021. This Plan is to be continuously reviewed and updated. Reports will be submitted bi-annually to the IJB Audit Committee for scrutiny.

Agreed by:






**Nick Fayers
Chief Officer
Western Isles
Integration Joint Board**








**Gillian McCannon
Chair
Western Isles
Integration Joint Board**



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Element 1: Senior Management Responsibility			
Element Requirement:	Western Isles IJB Statement:	Evidence:	Actions:
<p>Identify an individual at senior level who has overall strategic accountability for records management. This is a compulsory element under the terms of the Public Records (Scotland) Act: Section 1(2)(a)(i)</p> <p>It is required by the Act that an authority's records management plan (RMP), submitted for agreement with the Keeper, has the support of that authority's senior management team. It is therefore essential that the authority identifies 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>The senior individual (board level) who has overall strategic responsibility for records management is the Chief Officer of the Integration Joint Board / Health & Social Care Partnership.</p> <p>As at March 2020 this post is vacant.</p> <p>Appointment to the post of Chief Officer was taken up on 18.01.21 by Nick Fayers</p>	<p>Mr. Nick Fayers Chief Officer Integration Joint Board NHS Western Isles 37 South beach Stornoway Isle of Lewis, HS1 2BB Nick.fayers@nhs.scot</p> <p>Mr. Fayers was appointed to the IJB on 18.01.2021</p> <p>Job description attached</p> <p> Chief Officer PDF v3.pdf</p> <p>Supporting letter</p> <p> 09.04.21 - NF letter of support to RMP.c</p>	<p>No further action required.</p> 



Element 2: Records Management Responsibility			
Element Requirement:	Western Isles IJB Statement:	Evidence:	Actions:
<p>Identify individuals within the organisation, answerable to senior management, to have operational responsibility for records management within the organisation.</p> <p>This is a compulsory element under the terms of the Public Records (Scotland) Act 2011: Section 1(2)(a)(ii)</p> <p>The Keeper in agreeing an authority's RMP will wish to be assured that proper provision has been established for the day-to-day management of the authority's records. The Keeper will therefore require evidence to be submitted confirming the name and job title of the person or persons responsible for the day-to-day operation of the activities described in the authority's RMP. The Keeper will expect an authority to name an individual rather than simply a job title.</p>	<p>The Integration Joint Board does not store its records on a separate server or location but utilizes the resources within its two parent bodies. The day-to-day responsibility for the records management function sits with both parent organisation – NHS Western Isles and Comhairle nan Eilean Siar, and utilizes their RMP and policies.</p> <p>The IJB corporate records are primarily held within NHS Western Isles by the Corporate Business Manager. Any amendments specifically noted by the IJB will be discussed with the responsible colleagues within each parent organisation.</p>	<p>Contact Details: Michelle McPhail Corporate Business Manager NHS Western Isles E: michelle.mcphail@nhs.scot</p> <p>Job description</p> <p>Chief Officer – details confirmed as noted in Element 1 of this Plan.</p> <p>NHS Western Isles Records Management Plan (RMP)</p> <p>Records Management Function is the responsibility of:</p> <p>NHS Western Isles, Carol MacDonald, Information Governance Manager.</p> <p>Comhairle nan Eilean Siar, Tim Langley, Senior Solicitor.</p>	<p>No further action</p>   <p>Corp Bus Mngr JD - April 2021 IJB RMP a</p>  <p>Public Records Act Submissions - NHS V</p>


Element 3: Records Management Policy Statement			
Element Requirement:	Western Isles IJB Statement:	Evidence:	Actions:
<p>A records management policy statement underpins effective management of an authority's records and information. It demonstrates to employees and stakeholders that managing records is important to the authority and serves as a mandate for the activities of the records manager.</p> <p>This is a compulsory element under the terms of the Public Records (Scotland) Act 2011: Section 1 2(b)(i)</p> <p>It is important that an authority's records management plan (RMP), submitted for agreement with the Keeper, confirms that the authority has developed a records management policy governing the creation and management of authentic, reliable and useable records, capable of supporting business functions and activities for as long as they are required.</p>	<p>The IJB does not have a Records Management Policy. The IJB receives its records via both Parent organisations, NHS Western Isles and Comhairle nan Eilean Siar.</p> <p>The IJB corporate records are held and maintained on the NHS Western Isles electronic server and appropriate cloud based platform in line with NHS Western Isles Records Management Policy.</p> <p>Appropriate corporate records associated with the IJB are published externally, via CnES, available from the IJB website held on the Comhairle nan Eilean Siar, server in line with Comhairle nan Eilean Siar Records Management Policy.</p>	<p>Link to NHS Western Isles Records Management Policy –</p> <p> Item 5.6 - Records Management Policy</p> <p>Link to Comhairle nan Eilean Siar Records Management Policy...</p> <p><i>To be added upon receipt</i></p> <p>Noted in Element 2 – NHS WI RMP</p>	<p>No further action require.</p> 


Element 4: Business Classification Scheme			
Element Requirement:	Western Isles IJB Statement:	Evidence:	Actions:
<p>A business classification scheme describes the business activities the authority undertakes – whether alone or in partnership.</p> <p>In line with the Keeper of the Records of Scotland’s (The Keeper’s) obligations under the Public Records (Scotland) Act 2011 (the Act) the following guidance is issued about an authority’s Business Classification Scheme:</p> <p>It is expected that an authority’s Records Management Plan (RMP) submitted for agreement with the Keeper confirms that the authority has developed or is in the process of developing a business classification scheme.</p> <p>The term ‘business classification’ refers to a representation of an authority’s functions and the records created pursuing those functions.</p> <p>The purpose of this element is to demonstrate that the RMP takes account of the complete organisation and all its various business functions. This process will assist an authority in making good retention or disposal decisions under each of these business functions. To properly fulfil this element, an authority will need to demonstrate that its business classification scheme can be applied to the record management systems which it operates.</p>	<p>The IJB Business Classification is contained within both parent organisations as the records are held within that organisation’s Record Management Plan.</p> <p>For those papers raised by the IJB – agenda, minutes, reporting papers (all papers presented at IJB formal meetings) these are contained within the NHS Western Isles Business Classification Scheme</p>	<p>NHS Western Isles Business Classification Scheme – corporate documents.</p> <p> BCS - All Sections April 2021.pdf</p> <p>Noted in Element 2 – NHS WI RMP ~ since the presentation of NHSWI records management plan amendment has been made to the Business Classification to include the detail for the IJB</p>	<p>No further action required.</p> 


Element 5: Retention Schedules			
Element Requirement:	Western Isles IJB Statement:	Evidence:	Actions:
<p>The retention schedule is a list of records for which pre-determined disposal dates have been established.</p> <p>In line with the Keeper of the Records of Scotland's (The Keeper) obligations under the Public Records (Scotland) Act 2011 (the Act) the following guidance is issued regarding an authority's retention or disposal schedule.</p> <p>It is required by the Act that an authority's records management plan (RMP) submitted for agreement with the Keeper confirms that the authority has developed, or is in the process of developing, record retention and disposal schedules.</p>	<p>The IJB does not have a Records Retention Schedule.</p> <p>All corporate records are held on the NHS Western Isles server and are held in line with the NHS Western Isles Records Destruction and Retention Policy, based on the Scottish Government NHS Code of Practice.</p> <p>Staff instructions on operating the Schedule are evidenced in the Records Management Policy (as noted in Element 3)</p>	<p>NHS Western Isles uses the Scottish Government Records Management schedule as its primary document - www.information.govance.scot.nhs.uk/wp-content/uploads/2020/06/SG-HSC-Scotland-Records-Management-Code-of-Practice-2020-v20200602.pdf</p> <p>Noted in Element 2 – NHS WI RMP</p>	<p>No further action required.</p> 


Element 6: Destruction Arrangements			
Element Requirement	Western Isles IJB Statement:	Evidence:	Actions:
<p>It is not always cost-effective or practical for an authority to securely destroy records in-house. Many authorities engage a contractor to destroy records and ensure the process is supervised and documented.</p> <p>In line with the Keeper of the Records of Scotland's (The Keeper) obligations under the Public Records (Scotland) Act 2011 (the Act) the following guidance is issued regarding an authority's destruction arrangements:</p> <p>It is vital that an authority's records management plan (RMP) submitted for agreement with the Keeper confirms that the authority has developed or is in the process of developing proper destruction arrangements.</p> <p>Using a commercial disposal firm for the disposal of records other than electronic records is recommended because their practices will be controlled, audited, and fully compliant with current environmental regulations (their business can only exist if they are). They may be able to issue a certificate of destruction that should be maintained with the disposal schedule as proof that the record has been destroyed.</p> <p>In the context of both Data Protection and Freedom of Information legislation these sorts of procedures are the clear proof of controlled destruction of information that the Information Commissioner would be looking for in any disputed request which the institution was unable to answer.</p>	<p>The IJB does not have destruction arrangements.</p> <p>Corporate documents belonging to the IJB are held electronically on the NHS Western Isles server and on the Comhairle nan Eilean Siar server via the IJB website. All aspects of destruction of all formats of records is adhered to in compliance with the parent body.</p> <p>[as noted within Element 5 – NHS WI Retention & Destruction Policy]</p>	<p>NHS Western Isles:</p> <p>* Information Security Policy NHS WI</p>  <p>Item 5.2 - Information Security</p> <p>CnES –</p>  <p>CNESInformationSecurityPolicy.pdf</p> <p>*Information Governance Policy NHSWI -</p>  <p>Item 5.1 - Information Govern:</p> <p>Noted in Element 2 – NHS WI RMP</p>	<p>No further action required.</p> 


Element 7: Archiving and Transfer Arrangements			
Element Requirement:	Western Isles IJB Statement:	Evidence:	Actions:
<p>This is the mechanism by which an authority transfers records of enduring value to an appropriate archive repository, specifying the timing of transfers and other terms and conditions.</p> <p>This is a compulsory element under the terms of the Public Records (Scotland) Act 2011 Section 1 2(b)(iii)</p> <p>Obligations under the Public Records (Scotland) Act 2011 (the Act) the following guidance is issued regarding an authority's archiving policy and transfer arrangements.</p> <p>A small proportion of records created by a public authority will be earmarked for permanent retention. These records will normally be removed from operational systems and transferred to an archive. This applies to records in all formats, although the procedure for transfer will vary (for example electronic records allow for records to remain 'live' until the successful transfer of the archive copy has been confirmed).</p> <p>It is a fundamental part of a records management plan that procedures for facilitating such transfers are in place and are followed.</p>	<p>The IJB recognizes that records created by the IJB have enduring value and historical evidence and as such are required to be archived appropriately.</p> <p>Both parent organisation's have established an agreement with Tasglann nan Eilean and a formal Service Agreement was crated and signed in 2019.</p>	<p>Signed agreement between TnE Service and NHS Western Isles and Comhairle nan Eilean Siar</p>  <p>2019 TnE Service Agreement-signed.p</p> <p>Noted in Element 2 – NHS WI RMP</p>	<p>No further action required.</p> 


Element 8: Information Security			
Element Requirement:	Western Isles IJB Statement:	Evidence:	Actions:
<p>Information security is the process by which an authority protects its records and ensures they remain available It also maintains privacy where appropriate and provides for the integrity of the records.</p> <p>This is a compulsory element under the terms of the Public Records (Scotland) Act 2011 Section 1 2(b)(ii)</p> <p>In line with the Keeper of the Records of Scotland's (The Keeper) obligations under the Public Records (Scotland) Act 2011 (the Act) the following guidance is issued regarding an authority's information security code:</p> <p>In the course of their business it is likely that public authorities will create records containing sensitive information about people, or details of business transactions, that the authority may wish to protect from general consultation. Similarly, it may create records that hold information which should not be amended or deleted without appropriate authority. In both these cases an information security code should advise staff. As part of a full RMP the Keeper would expect to see that such a code exists and is generally available to staff involved in the creation of records.</p>	<p>The IJB recognizes the importance of securing all relevant information. This is a requirement of the parent organisation's and falls within the General Data Protection Regulations (GDPR).</p> <p>The IJB receives its records via the parent body and is stored within their data systems, and is held in line with the Information Security Policies.</p> <p>The parent bodies provide training and education via eLearning pertaining to information security and confidentiality.</p> <p>The IJB corporate records are held on the NHS Western Isles server. Copies of minutes and agendas are held on CnES & IJB Website</p>	<p>Noted in Element 6 - Information Security Policy</p> <p>Noted in Element 2 – NHS WI RMP</p>	<p>No further action required.</p>  <p>Developments in 2020/21 – Both NHS Western Isles and Comhairle nan Eilean Siar have moved towards Microsoft Office 365 for email. However fuller development of the O365 system, including document management and sharing of documents will be developed in line with Scottish Government timeframes for NHS dissemination. <i>Currently no timescale from Scottish Government</i></p>

Element 9: Data Protection			
Element Requirement:	Western Isles IJB Statement:	Evidence:	Actions:
<p>Information security is the process by which an authority protects its records and ensures they remain available. It also maintains privacy where appropriate and provides for the integrity of the records.</p> <p>This is a compulsory element under the terms of the Public Records (Scotland) Act 2011 Section 1 2(b)(ii)</p> <p>In line with the Keeper of the Records of Scotland's (The Keeper) obligations under the Public Records (Scotland) Act 2011 (the Act) the following guidance is issued regarding an authority's information security code:</p> <p>In the course of their business it is likely that public authorities will create records containing sensitive information about people, or details of business transactions, that the authority may wish to protect from general consultation. Similarly, it may create records that hold information which should not be amended or deleted without appropriate authority. In both these cases an information security code should advise staff. As part of a full RMP the Keeper would expect to see that such a code exists and is generally available to staff involved in the creation of records. As evidence he will also want to view the authority's code.</p>	<p>The IJB recognises the need to have secure systems and processes in place for not just the IJB but also in conjunction with both parent bodies and the handling of such information between the parent body and other agencies.</p> <p>The IJB corporate records are held on NHS Western Isles server and recorded on the Business Classification Scheme of NHS Western Isles. NHS Western Isle does not operate a separate Data Protection Policy but this features within the Information Governance Policy</p>	<p>Noted in Element 6 – Information Governance Policy.</p> <p>Noted in Element 4 - Business Classification Scheme – NHSWI</p> <p>Noted in Element 2 – NHS WI RMP</p>	<p>No further action required.</p> 

Element 10: Business Continuity and Vital Records			
Element Requirement:	Western Isles IJB Statement:	Corporate Evidence:	Actions:
<p>A business continuity and vital records plan serves as the main resource for the preparation for, response to, and recovery from, an emergency that might affect any number of crucial functions in an authority.</p> <p>In line with the Keeper of the Records of Scotland's (The Keeper) obligations under the Public Records (Scotland) Act 2011 (the Act) the following guidance is issued to support authorities with regard to business continuity and vital records.</p> <p>It is recommended that public authorities have a business continuity plan and that they can identify key records that facilitate the operation of the authority.</p> <p>This applies whether the records kept are paper based, electronic or, most likely, a hybrid of the two.</p>	<p>All records and data stored on NHS Western Isles and Comhairle nan Eilean Siar networks are subject to regular backup and recovery procedures.</p> <p>NHSWI Disaster Recovery Plan which addresses clinical and corporate records.</p> <p>IT Business Continuity Plan</p>	<p>Noted in Element 6 – Information Security Policy</p> <p>Noted in Element 2 – NHS WI RMP</p>	<p>Further review is required as the both organisations compliance.</p> <p><i>Timescale will be discussed with the parent bodies</i></p> 

Element 11: Audit Trail			
Element Requirement:	Western Isles IJB Statement:	Corporate Evidence:	Actions:
<p>An audit trail is a sequence of steps documenting the movement and/or editing of a record resulting from activities by individuals, systems or other entities.</p> <p>In line with the Keeper of the Records of Scotland's (The Keeper) obligations under the Public Records (Scotland) Act 2011 (the Act) the following guidance is issued regarding audit trails:</p> <p>It is considered good practice that the whereabouts of records should be known at all times and movement of files around an electronic system or between physical storage areas or office areas should be logged.</p> <p>Records held on physical media, such as paper or microform, should be subject to an authority's registry system recording the movement of records around the organisation.</p> <p>For all records, in whatever format, a mechanism that monitors their movement and changes to content helps authorities ensure their authenticity and supports legal admissibility.</p>	<p>NHS Western Isles does not have a formal recording procedure / audit trail.</p>	<p>Noted in Element 2 – NHS WI RMP</p> <p>As noted in Element 8 – both parent organisations are developing their Office365 and the establishment of Document Management System.</p>	<p>This is dependent upon NHS WI developing a Document Management System (DMS)</p> 

Element 12: Competency Framework for Records Management Staff			
Element Requirement:	Western Isles IJB Statement:	Corporate Evidence:	Actions:
<p>A competency framework lists the core competencies and the key knowledge and skills required by a records manager.</p> <p>It can be used as a basis for developing job specifications, identifying training needs, and assessing performance.</p> <p>In line with the Keeper of the Records of Scotland's (The Keeper) obligations under the Public Records (Scotland) Act 2011 (the Act) the following guidance is issued regarding the skills required by an authority's records manager:</p> <p>As part of a robust plan, the Keeper would expect to see that the individual(s) responsible for the implementation and operation of the overall RMP has the relevant skills and training to carry out the task to a reasonable standard. He will welcome proof that a public authority recognises that records management is a separate function from general office duties and will require specific resources applied in the form of training.</p>	<p>The Partnership is responsible for the commissioning of service from NHS Western Isles and Comhairle nan Eilean Siar, who provide the delivery of those services through their employees. The Partnership does not employ staff directly.</p> <p>The Comhairle and NHS Board have training plans in place for their staff involved in Records Management.</p> <p>The Partnerships corporate records are held and maintained on the NHS Western Isles electronic server and therefore conform to the Information Asset Register.</p>	<p>NHS Western Isles – Carol MacDonald is the Information Governance Manager</p> <p>Noted in Element 2 – NHS WI RMP</p> <p>Comhairle nan Eilean Siar – Tim Langley, Senior Solicitor</p> <p>IJB Records Manager will be Michelle McPhail, Corporate Business Manager</p>	<p>No further action required.</p> 

Element 13: Assessment and Review			
Element Requirement:	Western Isles IJB Statement:	Evidence:	Actions:
<p>Regular assessment and review of records management systems will give an authority a clear statement of the extent that its records management practices conform to the Records Management Plan as submitted and agreed by the Keeper.</p> <p>The Keeper considers that it is a fundamental part of a records management plan (RMP) that it is reviewed:</p> <ul style="list-style-type: none"> • Shortly after implementation to determine whether it is operating as expected. • On a regular basis thereafter to check that it still appropriate to the business needs of the organisation and has properly responded to the changes in circumstance that occur over time. 	<p>The IJBs' Records Management Plan will be scheduled for review annually via the IJB Audit Committee, scrutiny on behalf of the IJB.</p> <p>The Keeper will be advised of the position of the Partnerships' RMP, majority of which will be depending upon the clarity of the progress within the Parent Body.</p>	<p>Noted in Element 3 – NHS Western Isles Records Management Plan.</p> <p>Noted in Element 2 – NHS WI RMP</p> <p>The review of the IJB RMP will be carried out by the Corporate Business Manager and report to the IJB Audit Committee.</p>	<p>Bi-Annual review will be conducted and scrutinized by the IJB Audit Committee.</p> <p>The review of the submission will be presented to the IJB Audit Committee in June 2021.</p> 

Element 14: Shared Information			
Element Requirement:	Western Isles IJB Statement:	Evidence:	Actions:
<p>Under certain conditions, information given in confidence may be shared. Most commonly this relates to personal information, but it can also happen with confidential corporate records.</p> <p>The Keeper of the Records of Scotland (The Keeper) has issued the following statement about information sharing in line with his obligations under the Public Records (Scotland) Act 2011 (the Act):</p> <p>Information has been shared between public authorities for a number of years for the benefit of clients and stakeholders, but also in the interests of efficient public services. Sharing relevant information leads to benefits for service users in improved and more joined-up services. Scottish Government positively encourages information sharing across the public sector when it benefits society in general, but particularly when it is necessary to protect vulnerable adults or children. If your authority is not currently sharing information then it is very likely that you will be doing this in the future. An authority's RMP must indicate what safeguards are in place to ensure that information will be shared lawfully and securely. It will for example include reference to Information Sharing Protocols (ISPs). Policy documents, protocols, agreements and other information sharing documentation should be submitted as evidence that this aspect of records management is being handled appropriately.</p>	<p>An IJB must and has a duty to utilise the records from other partners, NHS Western Isles and Comhairle nan Eilean Siar, and therefore information sharing is a key part of the Boards business.</p> <p>The IJB reports, produced by the parent body, are provided under the legislation of the Public Bodies (Joint Working)(Scotland)Act 2014 and those services devolved to the strategic direction of the IJB. No personal details of any patient / client or staff members will be shared unless absolutely necessary under the GDPR Act.</p> <p>The IJBs corporate records are maintained on NHS Western Isles server and form part of the Information Asset Register.</p>	<p>Noted in Element 3 – NHS Western Isles Records Management Plan.</p> <p>Noted in Element 2 – NHS WI RMP</p>	<p>Review the position within each organisation</p> 