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Agenda Item: 12.

## **Integration Joint Board**

Date of Meeting: 25 June 2019.

Subject: Records Management Plan.

### **1. Summary**

1.1. The Board is required by the Public Records (Scotland) Act 2011 to adopt a Records Management Policy and a Records Management Plan.

### **2. Purpose**

2.1. To adopt a Records Management Policy and a Records Management Plan for the Integration Joint Board.

### **3. Recommendations**

The Integration Joint Board is invited to:

- 3.1. Approve the Records Management Policy, attached as Appendix 1.
- 3.2. Approve the Records Management Plan, attached as Appendix 2.

### **4. Background**

4.1. The Public Records (Scotland) Act 2011, came fully into force in January 2013. The Act obliges the Board and other public authorities to prepare and implement a Records Management Plan (RMP). The RMP sets out proper arrangements for the management of records. One Element of the Plan is the requirement to adopt a Records Management Policy.

4.2. The IJB has been informed by the Keeper of the Records of Scotland that it should submit its Plan by 20 April 2019. However, due to capacity issues, an extension was requested. An extension was agreed, and the revised deadline is 28 June 2019. After this date, there will be an opportunity to amend the Plan, incorporating any recommendations or comments from the Keeper. The RMP must include evidence to show the authority has adopted it and is working towards implementing the same.

## 5. Contribution to quality

Please indicate which of the Council Plan 2018 to 2023 and 2020 vision/quality ambitions are supported in this report adding Yes or No to the relevant area(s):

<b>Promoting survival:</b> To support our communities.	No.
<b>Promoting sustainability:</b> To make sure economic, environmental and social factors are balanced.	No.
<b>Promoting equality:</b> To encourage services to provide equal opportunities for everyone.	No.
<b>Working together:</b> To overcome issues more effectively through partnership working.	Yes.
<b>Working with communities:</b> To involve community councils, community groups, voluntary groups and individuals in the process.	No.
<b>Working to provide better services:</b> To improve the planning and delivery of services.	Yes.
<b>Safe:</b> Avoiding injuries to patients from healthcare that is intended to help them.	No.
<b>Effective:</b> Providing services based on scientific knowledge.	Yes.
<b>Efficient:</b> Avoiding waste, including waste of equipment, supplies, ideas, and energy.	Yes.

## 6. Resource implications and identified source of funding

6.1. No resource implications have been identified at this stage, but implications may be identified once the comments on the RMP from the Keeper of the Records of Scotland have been received.

## 7. Risk and Equality assessment

7.1. There are no risk or equality implications directly arising from this report.

## 8. Direction Required

Please indicate if this report requires a direction to be passed to:

NHS Orkney.	No.
Orkney Islands Council.	No.
Both NHS Orkney and Orkney Islands Council.	No.

## 9. Escalation Required

Please indicate if this report requires escalated to:

NHS Orkney.	No.
Orkney Islands Council.	No.
Both NHS Orkney and Orkney Islands Council.	No.

## 10. Author

10.1. George Vickers, Information Governance Officer, Orkney Islands Council.

## 11. Contact details

11.1. Email: [george.vickers@orkney.gov.uk](mailto:george.vickers@orkney.gov.uk) , telephone: 01856873535 extension 2162.

## 12. Supporting documents

12.1. Appendix 1: Records Management Policy.

12.2. Appendix 2: Records Management Plan.



# **Records Management Policy**

**Integration Joint Board**

## Document Control Sheet

### Review / Approval History

Date.	Name.	Position.	Version Approved.

### Change Record Table

Date.	Author.	Version.	Status.	Reason.

### Status Description

Final – The document is complete and is not expected to change significantly. All changes will be listed in the change record table.

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## **Definitions**

### **Record**

A record is recorded information, in any form, including data in systems, created received and maintained by the Orkney Integration Joint Board (the “Board”) and kept as evidence of an activity.

### **Vital Records**

This is a record without which an organisation would be unable to function or to prove that a key activity had taken place.

### **Format**

A record can be in any format including (but not limited to) paper files, e-mail, audio/visual, electronic documents, systems data, databases, digital images and photographs.

### **Records Management**

The control of the Board records during their lifetime, from creation to storage, until archiving or destruction.

### **Record Keeping System**

A system or procedure by which the records of the Board are created, captured, secured, maintained and disposed of.

## **1. Policy Statement**

The records of the Board constitute an auditable account of the Board's activities. They provide evidence of the business, actions, decisions and policies created by the Board.

Records represent a vital asset. Effective record keeping supports efficiency, consistency and continuity of work and enables the Board to fulfil its role. It ensures that the correct information is captured, stored, maintained, retrieved and destroyed or preserved in accordance with business need, best practice and the law.

Records management is an essential part of enabling the Board to achieve priority outcomes that reflect what is most important to the people and communities of Orkney. The Board will maintain a Records Management Plan, policies, procedures and practices across all its service areas. These will be based upon the requirements of the Public Records (Scotland) Act 2011 and the principles detailed below.

## **2. Objectives**

The key objectives of this Policy are to establish:

- Awareness of records management principles, roles and responsibilities within the Board.
- A common and consistent approach to Records Management.
- Compliance with legislation relating to Records Management.
- Arrangements for monitoring and reporting on Records Management.

## **3. Scope**

This policy applies to all aspects of Board operations including:

- All staff and those performing a function on behalf of the Board.
- All records in all formats.
- Business information systems used to create, store, maintain and archive or dispose of records.

## **4. Principles**

The following principles will drive activities relating to records management:

- Records are a valuable resource and must be managed as such.
- Records are maintained in accordance with legislation.
- Records are stored within record keeping systems rather than in personal filing.
- Records are shared and not duplicated.
- Records are stored in a consistent manner that reflects Board functions.
- Records are appropriately secured.
- Records are easily accessible for as long as they are required.
- Records that are identified as vital are protected accordingly.



- Records that are identified as of historical significance are preserved.
- Records are disposed of in accordance with approved Record Retention Schedules.
- Records management procedures are understood by all staff and staff are appropriately trained.
- Records management is a responsibility of all staff.
- Records management practices comply with corporate policy, procedures, best practice and the law.
- Record keeping systems manage records throughout their lifecycle.
- Records management practices will support Board values.

## **5. Benefits**

The benefits of effective records management for the Board are:

- Accurate and reliable records that are created, stored and disposed of in a managed environment.
- Increased efficiency and effectiveness.
- Accurate and timely retrieval of records through effective filing schemes.
- Savings in administrative costs.
- Support and achievement of business objectives and targets.
- Better use of Board facilities as records are retained for no longer than is necessary through use of retention schedules.
- Compliance with legislation or guidelines governing the retention of local authority records.
- Identification of records of historical value for permanent retention at the earliest possible moment.
- Records are created and managed in the most appropriate medium.
- Improved compliance with access to information legislation.
- Records are maintained adequately for the purposes for which they are kept.

## **6. Roles and Responsibilities**

All processes and procedures relating to records must comply with and support this policy. Overall responsibility and accountability for ensuring that all staff and associated third parties comply with information legislation, this Policy and associated policies and procedures lies with the Board's Chief Officer. The Board's Chief Officer will act as the Board's Senior Information Risk Owner. S/he has strategic responsibility for information governance.

### **Head of Legal Services**

The Council's Head of Legal Services will monitor compliance with information legislation and this Policy across Board.

## 7. Legislative and Standards Framework

This Policy and the associated records management guidance have been developed within the context of national legislation, professional standards and codes of practice. As far as is practical, this Policy and associated policies and procedures will address the records management principles found in relevant legislation, standards and codes of practice, including:

- Legislation:
  - Public Bodies (Joint Working) (Scotland) Act 2014.
  - Adults with Incapacity (Scotland) Act 2000.
  - Age of Legal Capacity (Scotland) Act 1991.
  - Computer Misuse Act 1990.
  - Copyright, Designs and Patents Act 1988.
  - Data Protection Act 2018.
  - General Data Protection Regulation.
  - Environmental Information (Scotland) Regulations 2004.
  - Freedom of Information (Scotland) Act 2002.
  - Inspire (Scotland) Regulations 2009.
  - Human Rights Act 1998.
  - Local Government (Scotland) Act 1994.
  - Public Records (Scotland) Act 2011.
  - Regulation of Investigatory Powers (Scotland) Act 2000.
  - Re-use of Public Sector Information Regulations 2015.
  - Carers (Scotland) Act 2016.
  - Children (Scotland) Act 1995.
  - Adoption and Children (Scotland) Act 2007.
  - Children's Hearing (Scotland) Act 2011.
  - Children and Young People (Scotland) Act 2014.
  - Social Care (Self Directed Support) (Scotland) Act 2013.
  - Frank's Law (free personal care for under 65's).
- Standards:
  - BS ISO 15489 – Information and Documentation - Records Management. Ensures that policies and procedures are in place.
  - BIP 0025 – Effective Records Management. For introducing best practice quality initiatives; legal and regulatory compliance in the management of records.

- BS 10008:2008 – Evidential weight and legal admissibility of electronic information. Where significant amounts of an organisation’s information is in electronic format this standard is relevant.
- Code of Practice:
  - Code of Practice on Records Management issued under Section 61 of the Freedom of Information (Scotland) Act 2002.
  - SSSC Codes of Practice.

## **8. Monitoring and Reporting**

This Policy will be reviewed annually by the Board’s Chief Officer.

A review of the Board’s compliance with relevant legislation and best practice will be reported to elected members on an annual basis.

## **9. Further Information and Guidance**

For enquiries relating to Records Management Policy, please contact:

Orkney Health and Care, School Place, Kirkwall, Orkney, KW15 1NY.  
Telephone: 01856873535, email: [OHACfeedback@orkney.gov.uk](mailto:OHACfeedback@orkney.gov.uk).



# **Records Management Plan**

**Integration Joint Board**

## Document Control

Title.	Records Management Plan.
Prepared By.	George Vickers.
Approved Internally By.	
Date of Approval.	
Version Number.	Version 0.4.
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## Status Control

Version.	Date.	Status.	Prepared By.	Reason for Amendment.

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## **Foreword**

This is the Records Management Plan for the Orkney Integration Joint Board (the “Board”). It has been prepared in compliance with the requirements of the Public Records (Scotland) Act 2011.

The Board takes its responsibilities for records management very seriously. Our records and archives will provide materials for the historians of the future. The Board will protect and manage information like any other asset that we are entrusted with.

The Board expects that this Records Management Plan will provide a firm foundation from which we can make better use of this information. It will help make sure:

- That our officers and Board members have the right information to hand to support their activities and decisions.
- That information is freely available when required or only available to those who need it if that information is personal or sensitive.
- That the Plan is accurate, reliable and up to date.
- That we do not waste valuable resources storing information which is no longer required is superseded or is duplicated elsewhere.

All this must be done against our obligations to safeguard the historical and archival memory of Orkney.

The Plan also recognises that we are on a journey. Many of the elements within the Plan describe the future developments which will improve our records management policies and procedures.

I commend this Plan to the Keeper of the Records of Scotland and the people of Orkney.

**Sally Shaw**  
**Chief Officer**

## Introduction

The Public Records (Scotland) Act 2011 (hereafter referred to as "the Act"), came fully into force in January 2013. The Act obliges the Board and other public authorities to prepare and implement a records management plan (RMP). The RMP sets out proper arrangements for the management of records. The plan is agreed with the Keeper of the Records of Scotland (the Keeper) and reviewed by the Board on an annual basis.

The Board's Records Management Plan is based on the Keeper's published Model Records Plan. The model plan has 14 Elements.

The 14 elements of the Board's Plan are:

01. Senior management responsibility.
02. Records manager responsibility.
03. Records management policy statement.
04. Business classification.
05. Retention schedules.
06. Destruction arrangements.
07. Archiving and transfer arrangements.
08. Information security.
09. 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 Board has provided the Keeper with evidence of policies, procedures, guidance and operational activity on all elements of the Plan.

The Plan was agreed with the Keeper on ....2019 and will be reviewed in June 2020.

The Board's RMP relates to records throughout their lifecycle, from creation and acquisition to archive and destruction.

For more information about the Public Records (Scotland) Act 2011, visit the website of the [National Records of Scotland](#).

A copy of the Act can be viewed online via [The National Archives](#) website.

## 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 Public Bodies (Joint Working) (Scotland) Act 2014 provides the legislative framework for the integration of health and social care services in Scotland.

It will put in place:

- Nationally agreed outcomes, which will 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.

## **Records Management in the Board**

The records of the Board constitute an auditable account of the authority's activities, which provides evidence of the business, actions, decisions and resulting policies formed by the Board.

Records represent a vital asset, which support the daily functions of the Board. Effective record keeping supports efficiency, consistency and continuity of work. It ensures that the correct information is captured, stored, maintained, retrieved and destroyed or preserved in accordance with business need, statutory and legislative requirements.

Records management is an essential part of enabling the Board to achieve priority outcomes that reflect what is most important to the people and communities of Orkney, as set out in the Board's [Strategic Commissioning Plan](#) available on the Board's website. The Board maintains a [Records Management Policy](#) and procedures and practices across all its service areas. These are based upon the requirements of the Public Records (Scotland) Act 2011, records management best practice and the principles detailed below.

## **Records Management Principles**

The following principles will drive activities relating to records management:

- Records are a valuable resource and must be managed as such.
- Records are maintained in accordance with legislation.
- Records are stored within record keeping systems, rather than in personal filing.
- Records are shared and not duplicated.
- Records are stored in a consistent manner that reflects the Board's functions.
- Records are appropriately secured.
- Records are easily accessible for as long as they are required.
- Records that are identified as vital are protected.
- Records that are identified as of historical significance are preserved.
- Records are disposed of in accordance with approved Records Retention Schedules.

- Records management procedures are understood by all staff and staff are appropriately trained.
- Records management is a responsibility of all staff.
- Records management practices adhere to the Board's policy, procedures and standards.
- Records keeping systems are compliant with the requirements to manage records throughout their lifecycle.
- Records management practices will support the Board's values.

### **Records covered by this plan**

In line with the Act, all records created in the carrying out of the Board's functions (whether directly or by third parties) are public records. Part 1, section 3.1 of the Act states that:

"... "public records", in relation to an authority means –

- (a). Records created by or on behalf of the authority in carrying out its functions.
- (b). Records created by or on behalf of a contractor in carrying out the authority's functions.
- (c). Records created by any other person that have come into the possession of the authority or a contractor in carrying out the authority's functions."

### **Records Management Systems and the Board**

The Board uses four main types of records management systems:

- Manual filing systems.
- IT applications and databases (that process records for specific functions e.g. HR, Purchasing, Housing Management etc.).
- Corporate Electronic Documents and Records Management System (EDRMs).
- Electronic documents stored on a shared drive using Windows Folders.

All records management systems are subject to records management policy, procedures, guidelines and elements of this Plan.

# **The 14 elements of the Board's Records Management Plan**

## **01: Senior Management Responsibility**

Senior Management responsibility for the Records Management Plan lies with the Chief Officer for the Board.

Responsibility for providing advice on data protection, and advising on and monitoring compliance with data protection laws, lies with the Board's Data Protection Officer and Head of Legal Services for Orkney Islands Council.

For enquiries relating to the Records Management Plan, please contact:

Chief Officer.

Orkney Health and Care, School Place, Kirkwall, Orkney, KW15 1NY.

Telephone: 01856873535, email: [ohacfeedback@orkney.gov.uk](mailto:ohacfeedback@orkney.gov.uk).

## **02: Operational Records Management Responsibility**

The points of contact for the operation of records management within the Board are Chief Finance Officer and Orkney Islands Council's Senior Committees Officer.

For enquiries relating to Records Management, please contact:

Chief Finance Officer.

Orkney Health and Care, School Place, Kirkwall, Orkney, KW15 1NY.

Telephone: 01856873535, email: [OHACfeedback@orkney.gov.uk](mailto:OHACfeedback@orkney.gov.uk).

Senior Committees Officer.

Orkney Islands Council, School Place, Kirkwall, Orkney, KW15 1NY.

Telephone: 01856873535, email: [OHACfeedback@orkney.gov.uk](mailto:OHACfeedback@orkney.gov.uk).

## **03: Records Management Policy Statement**

The Board's commitment to effective records management is set out in its Records Management Policy published on the Board's website, and is subject to ongoing monitoring and annual review.

Online guidelines and procedures are available to staff. This is supported by online training and the Information Governance Officer, a post jointly funded by Orkney Islands Council and NHS Orkney.

Some records and documents are held in personal drives and personal email accounts and these are outwith the Board's Records Management Policy.

The Board uses a series of different systems that manage documents and records, such as folders on the secure G Drive within the Council, and these systems will be reviewed and, where necessary, plans put in place to ensure that the systems apply the Board's Records Management policies.

## **04: Business Classification**

The Board uses the Scottish Council on Archives Records Retention Schedule (SCARRS) as the basis of its Business Classification Scheme.

The Board recognises the importance and benefits of organising its information in such a way that facilitates business efficiency and information management and has developed a business classification scheme covering all functions of the Board.

- Governance documents.
- Equalities.
- Human resources.
- Recruitment of members of the IJB.
- Finance.
- Management and Administration.
- Policies and Procedures.
- Strategic Planning.
- Oversight of Services.

The Business Classification Scheme is developed in a structure that supports the business activities of the Board. The Board is structured in three tiers:

- Level 1: functions.
- Level 2: activities.
- Level 3: transactions.

The Board has combined its Business Classification Scheme and Records Retention and Disposal Schedule.

## **05: Retention Schedules**

The Board has developed a Retention and Disposal Schedule with records organised according to the Business Classification Scheme (element 04). The Schedule also lists those Vital Records that would be required for ensuring that the Board can implement its Business Continuity Plans.

The Retention and Disposal Schedule covers all the Board's records and draws together into a single reference document all existing statutory, regulatory and best practice retention and disposal arrangements. The Board has adapted the Scottish Council for Archives records retention schedule model (SCARRS) as the basis for its Retention and Disposal Schedule and has mapped their schedule to their Business Classification Scheme. The Retention and Disposal Schedule applies to both electronic records and paper records.

Requests for changes to the Schedule should be made to the Chief Finance Officer who maintains the Schedule.

The Schedule is located on the Records Management Policy page of the Board's website.

The Board provides a centralised resource for long-term storage of operational records (non-current) and the Orkney Library and Archive service provides a service for the preservation of historical records. This resource manages the retention and disposal of these records and works with the Board to identify records for archival, preservation or destruction.

Standards for records retention are built into any contracts and agreements with third parties who share or process information on the Board's behalf.

## **06: Destruction Arrangements**

The Board recognises that a disposal policy secures the position of the Board and helps every member of staff in their day-to-day work.

The Board has procedures for the disposal of records. The procedures require disposals to be:

- Authorised.
- Appropriate.
- Secure and confidential.
- Timely.
- Documented.

Destruction of highly sensitive hard-copy records will be supervised by an appropriate officer.

Disposals of hard drives will be disposed of securely by the Orkney Islands Council IT Service in accordance with the Council's Information Security Policy.

Data in other electronic business systems will be deleted in such a way that prevents reconstruction.

## **07: Archiving and Transfer Arrangements**

Orkney Library and Archive provides facilities for the preservation of historical records.

The official records of the Board will form a part of Orkney Archive. Archiving and transfer arrangements are detailed within the County's Archive "Procedure for Appraising which Records should be Transferred to the Archive Service" and within the IJB's approved records retention schedules.

The Senior County Archivist is responsible for deciding which records are to be kept permanently after liaising with the appropriate service areas. The Orkney Archive Service has adopted clear principles approved to help ensure that records which document the principal actions of the Board and its officials, the rights of the islanders and the community experience are identified and preserved.

Records identified in the Retention and Disposal Schedule as being suitable for permanent preservation will be transferred from the Board's Records Store to

Orkney Archive. Transfer is undertaken using Council employees directed by the Board, using Council vehicles.

Records received in Orkney Archive are documented on an Accession Receipt Form prior to entry in the Archive catalogue.

## **08: Information Security**

All Board records are held on IT systems provided by Orkney Islands Council or, in the case of paper records, stored on Council premises. All staff who manage and have access to Board records are employees of the Council. The Board has therefore decided that it is appropriate to adopt and follow the Council's Policy and Procedures. The Board's staff, the Chief Officer and the Chief Finance Officer, are employees of the Council, and are already required by their employment contracts to comply with the Council's Information Security Policy, guidance and procedures.

Orkney Islands Council's Information Security Policy is a high-level document which sets out the Council's strategic direction regarding information security.

The Policy is based on the 7 principles of information security listed below:

1. Data Protection – Ensuring data is protected.
2. Relevance and Consistency – Ensuring the controls in place to ensure information security are relevant to the risk, proportionate and applied consistently across the organisation.
3. Security is an Enabler – Viewing information security as a means of assisting rather than hindering the business strategy.
4. The Right Access – Employees require the right access to effectively do their job coupled with the principle of least privilege, but how can we share information securely to improve efficiencies and effectiveness.
5. Plan for the Unexpected – Regardless of vigilance vulnerabilities will emerge as new attacks occur, and malware mutate. Orkney Islands Council must anticipate this and be prepared.
6. Security for the Whole Lifecycle – Security should be considered from the start of a project and not bolted on later.
7. Accountability – It must be possible to hold authorised users of information accountable for their actions.

To ensure effective implementation in practice, this policy is underpinned by guidelines. The Corporate Information Security Staff Guidance booklet, published by Orkney Islands Council, gives basic advice on basic information security, use of the internet at work, email and mobile devices. It also provides guidance on taking information out of the workplace, using IT equipment at home and what to do if something goes wrong. It also explains how ICT facilities may be used and the conditions in place relating to individual use. This booklet is provided to all staff who manage or have access to Board records and staff are instructed to follow this guidance.

All staff who manage or have access to Board records are required to complete an online Information Security course written by the Council's Information Security Officer.

## **Governance**

The Council's Head of IT and Facilities champions information security provides strategic leadership and reports to the Council's Senior Management Team (SMT). The Board's Chief Officer, is a member of this SMT. Professional advice and guidance is provided by the Council's Information Security Officer.

The Council's Senior Management Team sets the strategic direction in relation to information security and ensures resources for implementation. The fact that Information Security is represented at board level demonstrates its level of importance to Orkney Islands Council.

Orkney Islands Council has engaged the services of a CLAS consultant to advise on matters of infrastructure and operational security. A CESG CHECK compliant organisation is used to provide independent IT Health Checks to ensure that systems are compliant.

CESG is the Communications Electronic Security Group.

CLAS is the CESG Listed Advisor Scheme.

CHECK is an assurance scheme for security testers managed by the CESG.

## **09: Data Protection**

Data Protection legislation is enforced and promoted by the Information Commissioner, who provides guidance and advice on complying with the terms of Data Protection legislation and investigates complaints regarding possible breaches of the obligations contained within this legislation.

The Information Commissioner maintains a register of Notifications listing all Data Controllers in the UK. Data Controllers are required to register the types of personal data processed by them, the purposes of that processing and the third parties with whom the personal data may be shared. The Board is registered with the Information Commissioner's Office as a data controller and its registration number is ZA207653.

The Board has appointed the Council's Head of Legal Services, as its Data Protection Officer.

The Board does not handle any personal information relating to services users that has not already been pseudonymised or anonymised. The only personal data handled by the Board relates to its two members of staff, the Chief Officer and the Chief Finance Officer, who are employees of Orkney Islands Council and members of the Board. Because the only special category information that the Board is likely to handle relates to members of staff who are employees of the Council, the Board has decided to adopt and follow the Council's Data Protection Policy and Data Protection Procedure. As employees of the Council, the Board's staff are already required by

their employment contracts to comply with the Council's Data Protection Policy and Procedure.

The Data Protection legislation regulates the processing of personal data by the Board. The General Data Protection Regulation (the 'Regulation') and the Data Protection Act 2018 gives individuals rights which are:

- The right to be informed about how their information will be used.
- The right of access to their personal information.
- The right to rectification, which is the right to require the Board to correct any inaccuracies.
- The right to request the erasure of any personal information held by the Board where the Board no longer has a basis to hold the information.
- The right to request that the processing of their information is restricted.
- The right to data portability.
- The right to object to the Board processing their personal information.
- Rights in relation to automated decision making and profiling.

The General Data Protection Regulation sets out 6 data protection principles which must be complied with when the Council is processing personal data. The 6 principles require that personal data is:

1. Processed lawfully, fairly and in a transparent manner in relation to individuals.
2. Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes
3. Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
4. Accurate and, where necessary, kept up to date.
5. Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.
6. Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

The Council's Data Protection Policy and Data Protection Procedures sets out the responsibilities of members of staff.

The Council has a Data Protection Policy to ensure that the Council complies with the requirements of the Data Protection legislation. The Policy will be regularly reviewed. In addition, the Council has developed Data Protection Procedures and Guidance for officers to ensure compliance with the responsibilities of the Council when processing personal data. This includes policies and procedures for the use of mobile electronic devices, the use of Council email and internet systems, the application of passwords to electronic information, the disposal of IT hardware and a general records management policy.



All staff who manage or have access to Board records are required to undertake data protection training to ensure that personal data is processed in accordance with the data protection principles. This training will be refreshed annually and is reinforced through the year with ongoing guidance provided by the Council to IJB staff.

## **10: Business Continuity and Vital Records**

The Vital Records are those records which the IJB and services will need to implement their Business Continuity Plans. The IJB's vital records are set out in the IJB's Retention and Disposal Schedule.

The Business Continuity 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.

The IJB's records are managed by the Council and are subject to the policies and procedures of the partner body in relation to business continuity. Business Continuity Plans for the Council services responsible for the IJB's records, are in place.

All services will continue to be provided or commissioned directly by NHS Orkney or Orkney Islands Council. As such there is no direct requirement for the IJB to have its own arrangements for business continuity of vital records held by these services. Both NHS Orkney and Orkney Islands Council have adequate business continuity arrangements to ensure the sustainability of health and social care services for which the IJB has overall responsibility.

## **11: Audit Trail**

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.

Control sheets are attached to IJB policies and procedures so it is possible to identify which is the current version, what changes may have been made to the policies and procedures and when.

The IJB's records are created by Orkney Islands Council and NHS Orkney and are managed via Orkney Islands Council's IT system. The records are held in windows folders on the secure G drive within the Council. This works well for the relatively small number of records that the IJB has created.

The Council is moving to an Electronic and Document Records Management System using Office365/SharePoint and the IJB will move to this system which will be better for managing larger numbers of records and capturing an audit trail.

## **12: Competency Framework for Records Management Staff**

The staff responsible for managing IJB records, the Chief Officer, the Chief Finance Officer and the Council's Senior Committees Officer, have all completed the training prepared by the Council for Records Management, Data Protection and Information Security.

The IJB is supported by the Information Governance Officer, a post jointly funded by the Council and the NHS, who is fully trained on Records Management and Information Governance.

### **13: Assessment and Review**

The IJB relies on the partner authority to ensure that the systems, policies and procedures that govern its records are being regularly assessed.

This Records Management Plan will be reviewed and updated through the Orkney Health and Care Senior Management Team. During the first year any gaps in this Plan will be identified as issues arise and solutions agreed.

### **14: Shared Information**

Under certain conditions, information given in confidence may be shared. Most commonly this relates to information which is not confidential and any personal information will have been anonymised or pseudonymised. However, confidential corporate records may be shared with the Council, NHS Orkney, the Scottish Government and others.

The IJB will not share personal information, other than that relating to the staff employed to support the IJB, the Chief Officer and the Chief Finance Officer. This information will be managed according to the Council's Data Protection and Information Security policies.

The IJB Publication Scheme identifies information which is available under the Freedom of Information (Scotland) Act 2002 (FOISA).