

Inverclyde Council and Inverclyde Licensing Board

Records Management Plan

Version 1.0

Produced by:
Information Governance Steering Group
Inverclyde Council
Municipal Buildings
GREENOCK
PA15 1LX

2015



INVERCLYDE COUNCIL IS AN EQUAL OPPORTUNITIES EMPLOYER

**THIS POLICY BOOKLET IS AVAILABLE ON REQUEST, IN LARGE PRINT, BRAILLE, ON
AUDIOTAPE, OR COMPUTER DISC.**

DOCUMENT CONTROL

Document Responsibility		
Name	Title	Service
Chief Officer, IHSCP	Records Management Plan	Information Governance and Management

Change History		
Version	Date	Comments
1.0	12 November 2015	Final version

Distribution		
Name/ Title	Date	Comments

Distribution may be made to others on request

Policy Review		
Review Date	Person Responsible	Service
October 2016	Information Governance Officer	Information Governance and Management

Copyright

All rights reserved. No part of this publication may be reproduced, stored in a retrieval system or transmitted in any form or by any means, electronic, mechanical, photocopying or otherwise without the prior permission of Inverclyde Council.

INTRODUCTION

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

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

Records management is the adoption of procedures and systems that allow the most efficient control of the information resources of the Council. Records management ensures that records are kept only as long as they are needed for commercial, legislative or administrative purposes; that records of historical importance are identified; and that records are stored in the most cost-effective way.

Good records management is essential for any corporate body to function effectively. Inverclyde Council's and Inverclyde Licensing Board's records are essential for us to carry out our jobs, to provide information for decision making and evidence our activities. Our records are an essential part of enabling the Council and Licensing Board to achieve priority outcomes that reflect what is most important to the people and communities of Inverclyde, as set out in [Inverclyde Council's Corporate Statement](#). Effective management of corporate 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.

Inverclyde Council and Inverclyde Licensing Board will maintain records management policy, procedures and practices across all its services. These will be based upon the requirements of the Public Records (Scotland) Act 2011, records management best practice and principles.

RECORDS MANAGEMENT PLAN

The Records Management Plan for Inverclyde Council and Inverclyde Licensing Board is based on the Keeper's published Model Records Plan and covers 14 Elements:

1. [Senior Management Responsibility](#)
2. [Record 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](#)

Inverclyde Council and Inverclyde Licensing Board has provided the Keeper with evidence of policies, procedures, guidance and operational activity on all elements of the plan.

The Records Management Plan is effective from the 29th October 2015. This Plan is to be continually reviewed and updated.

ELEMENTS 1 - 3: RESPONSIBILITY & RECORDS MANAGEMENT POLICY STATEMENT

1.1 The senior responsible officer within Inverclyde Council with overall strategic responsibility for records management is:

Louise Long
Chief Officer and Senior Information Risk Owner
Inverclyde Health & Social Care Partnership (HSCP)
Inverclyde Council
Municipal Buildings
Greenock
PA15 1LY

1.2 The senior responsible officer within Inverclyde Licensing Board is:

Gerard Malone
Clerk to Inverclyde Licensing Board
Inverclyde Council
Municipal Buildings
Greenock
PA15 1LY

1.3 The point of contact for the day-to-day and operational records management within Inverclyde Council is:

Dean Robinson
Information Governance Officer
Inverclyde Council
Municipal Buildings
Greenock
PA15 1LY

Records Management responsibility for the Inverclyde Licensing Board has been delegated to Inverclyde Council.

- 1.4 The Council's commitment to effective records management is set out in the Council's Record Management Policy.

The Records Management Policy was approved at the Council's Policy & Resources Committee on 24 March 2015. The Policy highlights the importance placed on records management within the Council and the responsibilities placed on its staff. The Information Governance and Management Framework is the overarching policy framework.

All Council reports and policies once approved by the appropriate formal process are made available to staff via the Council's communication channels; email, Inverclyde Council Online (ICON) and to the public on its public facing website.

[Information Governance and Management Framework Report to Committee February 2012](#)

[Records Management Policy Approval. Minute No. 237](#)

[Records Management Policy](#)

[Information Governance and Management Report to Committee February 2014](#)

[Information Governance and Management Update Report to Committee March 2015](#)

ELEMENT 4: BUSINESS CLASSIFICATION

- 4.1 As yet, no formal Business Classification Scheme has been agreed for the Council. Information & Communication Technology (ICT) have agreed on an ad-hoc basis with several services to implement a folder structure that mirrors functional responsibilities with suitable file and folder level permissions.
- 4.2 A business classification structure for the HSCP has been developed on the new Electronic Document Management system (EDM) shared drive. This shows the Directorate's services structure.
- 4.3 ICT have been working with services developing the business classification. Folders have been created on EDM and guidance is being given to staff to move client related files from their current shared drive folders onto the new folders on EDM. At the same time, they are encouraged to move anything business related onto the new shared drive folders. A set period of time has been given to do this after which no further access will be given to current drive folders.
- 4.4 At present, the business classification scheme has not been linked with the Retention Schedule nor the proposed Information Asset Register. This Records Management Plan will assist this future work which will be considered after annual review. In the interim, deletion of old files on the network will be resourced by services by implementing the Retention Schedule.

ELEMENT 5: RETENTION SCHEDULES

5.1 This is included within the Council's Policy for the Retention and Disposal of Documents and Records Paper and Electronic. The schedule was developed with reference to the Retention Guidelines for Local Authorities, produced by the Information and Records Management Society and in collaboration with services of Inverclyde Council.

5.2 The Policy was updated in April 2015 and approved at the Council's Policy & Resources Committee on 19 May 2015. The updates reflect the statutory and regulatory retention periods in the Scottish Council on Archives Records Retention Schedule (SCARRS) and national guidance in respect of social work services. The Policy includes the records of Inverclyde Council and the Inverclyde Licensing Board.

[Updated Retention Policy Approval. Minute 388](#)

[Policy for the Retention and Disposal of Documents Paper and Electronic](#)

5.3 An abridged version of the schedule is available for commonly used files and documents for use by staff in the HSCP.

5.4 Retention and destruction arrangements for records created as a result of partnership working and where services have been commissioned from external suppliers are detailed in the [Records Management Policy](#) under Partnership Working and Commissioned Services and Suppliers. Appropriate records management, confidentiality, freedom of information, data protection and business continuity clauses are included in every contract.

5.5 All Council policies once approved by the appropriate formal process are made available to staff via the Council's communication channels; email, Inverclyde Council Online (ICON) and to the public on its public facing website.

5.6 Each service of the Council will be appointing a records management contact officer(s) to:

- Ensure officers who receive, create, hold, maintain, retain, share and/or dispose of records do so in line with the obligations set out in the Policy;
- Deal with the destruction or archiving of records in accordance with the policy;
- Ensure there is an effective filing system for all Service records, including the destruction of those

records.

The appointed records management contact officer(s) will ensure their service has a work plan in place to introduce mechanisms where retention, disposal and archiving coincide with effective records management in the policy. The work plan will provide a link between the service area , the Information Governance Officer and the Information Governance Steering Group.

- 5.7 The Council has identified Information Asset Owners through developing a data/information classification system. They will have responsibility for controls over their information assets including its retention, who it is shared with, risks and classification. The data/information classification system will identify the information asset's retention requirements. The Information Asset Owner role will be separately identified to the appointed records management contact officer(s) in services overseeing the implementation of the Retention Policy.

ELEMENT 6 : DESTRUCTION ARRANGEMENTS

- 6.1 Guidance of the destruction of records in the Council is available in the [Policy for the Retention and Disposal of Documents Paper and Electronic](#)
- 6.2 The Council uses an external supplier for the bulk destruction of paper records. Destruction takes place on-site and is a supervised process.
- 6.3 The Council also uses on-site confidential waste shredders which ensure that paper is securely destroyed.
- 6.4 A report has been agreed at Corporate Management Team (CMT) recommending a corporate approach to the deletion of archived emails that reflects the Council's Policy for the Retention and Disposal of Documents Paper and Electronic, the Information Classification Policy and the Records Management Policy. This will be submitted to the Policy & Resources Committee for approval.
- 6.5 There is no process in place yet for deletion of electronic documents from network drives, however the outcome of the business classification scheme will determine what documents are kept on drives and for how long in accordance with retention legislation.
- 6.6 The Council has a contract in place for secure disposal/destruction of computer hardware, as well as an internal process that maintains security during the disposal/destruction process.
- 6.7 The Council back up disk to disk, copying from the Council's primary data storage to its data recovery site but there are no physical copies to destroy. The Council does have a number of legacy systems that use the old tape back-ups, if they wear out or are damaged they would be securely destroyed as part of its disposal contract. The Council has not needed to do this since the contract was in place.
- The data recovery site back up is not cumulative. It copies (with some additional safeguards, such as keeping previous versions for a fixed period) the live data. When the data is deleted from a live record it will be deleted from the data recovery site thirty days later.
- 6.8 The Council uses EDM in some services, which destroys both image and index file when a document reaches its retention and approval for deletion has been given. We will be working over the next year to

roll EDM out to most of the rest of HSCP. Archiving and deletion on EDM will form a substantial workstream of the project in terms of reviewing the current functionality. Existing functionality gives us some capacity to identify and delete files.

ELEMENT 7: ARCHIVING AND TRANSFER ARRANGEMENTS

- 7.1 Archiving and transfer arrangements are detailed within the [Policy for the Retention and Disposal of Documents Paper and Electronic](#)

The Council is undergoing a process of reviewing and identifying the classification of its records which will lead to our archiving requirements.

- 7.2 The Council's historic archive repository is the Watt Library Archives.

The Watt Library
9 Union Street
Greenock
PA16 8JX

More information on the Archives service is available on the Council's website:

[Inverclyde Council Archives Services](#)
[Collections Online](#)

The Watt Library & Museum is in need of renovation subject to a re-evaluated Heritage Lottery Fund bid project. Limited space is available at the library for Council Archives.

[Watt Complex Refurbishment Project Development](#)

- 7.3 Permanent records identified in the retention schedule are currently stored at the Watt Library, within office premises and also in the Greenock Municipal Buildings (GMB) basement. A number of permanent records in the schedule are retained electronically on servers and on microfilm. The Council also has a storage facility at Unit 5, Kingston Business Park, Port Glasgow where hard copy records and museum articles are being stored. Fire resistant secure storage units are in the GMB and these are being assessed for suitability to store permanent and longer-term retention records.
- 7.4 Our short-term solution is to consolidate existing facilities to the Watt Library and back-up facilities at GMB. This will be subject to agreement and after reviewing our local requirements in determining what records we should be retaining permanently.

- 7.5 In consideration of the reduction of physical storage space, cost saving commitments and modernisation, some services are moving towards electronic storage of documents. Back-scanning has been undertaken for records in HSCP services so they can be retained electronically and stored on shared servers.
- 7.6 EDM has been implemented in Children and Families and Criminal Justice and the Homecare Service within the HSCP during the first phase of the project in 2014/15. 2015/16 will see further roll out to Health and Community Care and by the end of this phase 80% of Caseholders in HSCP will be using EDM to manage client information. EDM has also been rolled out in Revenues and Benefits and the Human Resources function is scheduled next. The Council is still exploring EDM as a long-term solution for its long term and permanent record storage.
- 7.7 The Council has an established Records Management Working Group who will be identifying priorities for records management within the council and provide guidance on how to embed corporate policy into the working practices of Directorates. Its aim is to develop and encourage a culture where services adopt corporate approaches to records management. The Council will be identifying record management contacts within services who will be responsible for managing records for archiving, transfer and destruction.

ELEMENT 8: INFORMATION SECURITY

- 8.1 The Council achieved its Public Sector Network (PSN) Accreditation in December 2014. The Public Services Network provides the Council with secure access to a number of services provided by National and Regional Government departments; Registers of Scotland (Births, Deaths and Marriage records), Department of Work and Pensions (DWP), Violent and Sex Offender Register as well as providing secure interdepartmental communications via GCSX Email. Each year, the Council is required to accredit its compliance with PSN Code of Connection. The Council's Information Steering Group, chaired by the SIRO and its sub-groups play a key role supporting this.
- 8.2 The Council adapts the [UK Government Secure Policy Framework](#) which is the basis on which we secure our network.
- 8.3 The Council has a dedicated ICT team who have responsibility for the ongoing management and delivery of ICT including the provision of strategic advice and support.
- 8.4 The Council has an [Acceptable Use of Information Systems Policy](#) available to all staff. This policy applies to all Council employees and elected members and covers the use of the internet and email, as well as equipment security and working from home on Council business. Individuals have to agree to terms and conditions before access is granted. In addition, there is a Protocol which details steps to be taken when an employee believes a breach of data protection has or may have taken place.
- 8.5 ICT ensure that the Council's systems maintain the appropriate security and integrity for its data:
- All systems are password protected
 - Staff are required to change passwords regularly
 - Portable equipment and portable media is encrypted and there are restrictions on using non-council external devices.
- 8.6 The Council has developed a number of guidance notes to help employees keep personal and sensitive data safe and to remind everyone of the real threats to information security. Key messages are communicated to all staff via email and on the Council's intranet 'Inverclyde Council Online' (ICON.)
- 8.7 Information Security is a core training requirement for Heads of Service, Service Managers and Service Team Leaders.

- 8.8 All staff now receive mandatory information security awareness training which includes information governance and records management. Staff are required to undergo refresher training annually and are reminded with information assurance awareness display messages on their personal computer when this is due. New starters have to complete security training on first day of work before they are given full access. The use of portable 'PlayStation' (PSP) e-learning devices is also being promoted specifically to meet the needs of staff who do not have access to a computer or who work in locations with limited access to training. Staff are reminded of the importance of information security through key messages sent via email and on ICON.
- 8.9 Employee terms and conditions have been updated and refer to compliance with Council policies and procedures. This includes The [Employee Code of Conduct](#) which has reference to the Data Protection Act 1998, Computer and other Systems, use of Council Intranet, Internet, Email, Confidentiality of Information and Managing Information.
- 8.10 The Council has developed a data/information classification system which identifies owners for critical information systems. An information asset register will be developed in 2015 which will enable information asset owners to monitor and apply controls to the information they are responsible for. Training of Information Asset Owners will take place this financial year.
- 8.11 The Council is updating its security classifications in line with the UK Government Security Classifications. A report detailing the changes and an implementation plan was approved at CMT.
- 8.12 In relation to data security, EDM delivers a number of benefits:
- Complies with data security policies in terms of security of client and patient data
 - Once documents are stored in EDM they cannot be changed or amended
 - Confidential files can be completely hidden from general view with only named individuals being permitted access.
 - Access to files can be restricted for users to view only certain parts of a file or certain documents within the file.
 - Individual user access levels can be set up.

ELEMENT 9: DATA PROTECTION

9.1 In order to deliver services to the communities and citizens of Inverclyde, the Council requires to gather and process personal data about residents, staff and other individuals. The Data Protection Act 1988 regulates the processing of personal data by the Council. The Data Protection Act gives individuals the right to be advised of and receive copies of any personal data relating to them which is held by the Council.

9.2 Under the Data Protection Act 1998 Inverclyde Council is a data controller and is registered with the Information Commissioner's Office (ICO).

The Council's registration can be found on the ICO's Data Protection Public Register website: <http://www.ico.org.uk>. Registration Number Z5004355.

The Licensing Board hold a separate registration at ZA151373

9.3 The Head of Legal and Property Services has responsibility for monitoring data protection compliance throughout the Council. Legal Services is responsible for providing routine advice on Data Protection to services throughout the Council and other officers within services who co-ordinate responses to Subject Access Requests made to that service.

9.4 Members of the public are made aware of their right to submit a Subject Access Request on the Council's website.

[Inverclyde Council Data Protection](#)

9.5 The Council has a data protection policy in place for employees and Elected Members as well as an Acceptable Use of Information Systems Policy. In addition, there is a Protocol which details steps to be taken when an employee believes a breach of data protection has or may have taken place.

[Inverclyde Council Data Protection Policy](#)

9.6 The [Employee Code of Conduct](#) states all employees are obliged to comply with the terms of the Data Protection Act 1998 and Confidentiality of Information.

- 9.7 Contracts entered into with third parties impose obligations covering data protection and confidentiality and are referred to in the Terms and Conditions.
- 9.8 A number of Data Protection seminars have been facilitated by Legal Services and further seminars have been planned for 2015. In addition, external training was provided in March 2015 to key staff who deal with Subject Access Requests.
- 9.9 The Council has a public facing privacy statement which explains how personal information will be used, processed and shared.
[Inverclyde Council Privacy Notice](#)

ELEMENT 10: BUSINESS CONTINUITY AND VITAL RECORDS

- 10.1 The Joint Civil Contingencies Service (CCS) is a shared service, and the Council is a participating council in the CCS' delivery of civil contingency planning for Inverclyde Council as required by the Civil Contingencies Act 2004 and other associated regulations. The CCS guides the Council in ensuring the development and testing of business continuity plans. Each of the Council's Directorates has its own business continuity plan and restoration document. Business Impact Analyses are maintained for each service area. These are reviewed on an annual basis, or following any incident that necessitates plan activation. The Council has a dedicated Council and Resilience Management Team (CRMT), consisting of senior directorate representatives, that meets quarterly to coordinate and develop contingency planning arrangements. The CRMT may also convene during an emergency to ensure the Council's response to an emergency is effectively coordinated.
- 10.2 The Council has adopted a Business Continuity Training Manual, which provides the resources for the owners of business continuity plans in each Directorate to formulate exercises, and test their planning arrangements. In addition the CCS delivers an annual training programme, which is agreed in conjunction with the Joint Management Board. Training and exercise elements throughout the year include bespoke response role training for officers and response teams at strategic, tactical and operational level, and 'call cascade' exercises, to test the accuracy of contact details in plans.
- 10.3 Directorate Restoration Documents and Service Business Impact Analysis Documents include details of critical functions and systems to enable prioritisation of recovery tasks where necessary.
- 10.4 At a Service/Directorate level the Business Continuity/Directorate Restoration Plans assume that core systems remain functional so at that level there would be no requirement to restore files etc. The ICT Business Continuity plan lists the systems and functions that are available in the event of a loss of the Data Centre – these are automatically available, so there is no requirement to restore them as such. Other applications and systems are then restored in line with the agreed timescales.
- 10.5 The Council is developing a data/information classification system which will identify vital records.

ELEMENT 11: AUDIT TRAIL

11.1 It is recognised that the Council at present does not have procedures in place in relation to audit trails covering all transactions undertaken, but there is good practice in place. Whilst some electronic records held within the Council are not held in a structured format with an audit trail, the migration of electronic records to EDM has brought in uniform structures across some services, and also introduces version control through date stamping and where appropriate, through the use of shared portals. The Council will start moving away from paper records through the roll-out of EDM.

11.2 The following electronic systems within the Council for some services have capabilities of providing audit trails.

- SWIFT Social Work Information System – covers restriction of access, significant events i.e. who has modified/added to a record. Modified notes shows who has changed a note but not what they have changed, this is done through our Business Objects Reporting tool.
- NORTHGATE Benefits and Revenues System - Within the system there is a facility to restrict access to view and update accounts. The access levels that staff are allocated are dependent on their job title and grade. A monthly review of user accounts and permission levels is carried out to ensure that user access to the system and data is in line with users' job roles. The Northgate system audit trail is able to report details of the table name that have changed, the action taken, the user name of the person who carried out the action and the date and time that the modifications took place.
- SEEMIS (Scottish Educational Establishments Management Information System) is the provider of a wide range of systems used by Education Services. Access to SEEMIS is controlled by the School Support Manager and key staff in Education HQ. who ultimately have the ability to start/stop accounts and also control the level of access that a person is given. The access levels that staff are allocated are dependent upon their job title and grade. Access to SEEMIS is restricted to the establishments that a person is working with and to particular parts of the SEEMIS system. The School Support Managers audit the accounts on a regular basis, making changes as and when staff join or leave an establishment.

11.3 The following audit trails are in place for some paper records:

- Policies and procedures have a document control sheet to record versions and changes.
- HSCP Advice Services use a card system to trace when a file is removed and when it has been returned.

ELEMENT 12: COMPETENCY FRAMEWORK FOR RECORDS MANAGEMENT STAFF

12.1 The Council does not have a dedicated Records Manager post nor dedicated Corporate Records Team. It has plans to transition the Information Governance Officer development post to a dedicated Records Manager post subject to organisational post creation and recruitment procedures. This would develop a core competency framework for a records manager or records management staff, however the Council does realise all staff have a role in relation to records management responsibilities.

12.2 The Council also employs staff who have specific responsibilities for Information Management and Records Management.

- Gerard Malone, Head of Legal & Property Services has specific responsibility for Data Protection.
- Helen Watson, Head of Planning, Health Improvement & Commissioning has responsibility for information governance around the HSCP client records system (SWIFT/EDM)

12.3 The Council's Training and Development team provide a number of training resources in information governance including e-Learning. All staff now have to undertake mandatory information governance training which includes:

- Information Governance – An Introduction
- Information Security
- Records Management

Refresher training will take place annually.

12.4 Job descriptions and terms and conditions have been updated and refer to compliance with Council Policies and Procedures. The [Employee Code of Conduct](#) reference to the Data Protection Act 1998, Computer and other Systems, use of Council Intranet, Internet, Email, Confidentiality of Information and Managing Information.

ELEMENT 13: ASSESSMENT AND REVIEW

13.1 The Council will review the Record Management Plan through its Information Governance and Management Framework. The Information Governance Steering Group (IGSG) will submit progress reports on the information governance and management framework and updates on the progression of the RMP to the Corporate Management Team (CMT) and Policy & Resources Committee periodically.

[Information Governance and Management Framework](#)

[Information Governance and Management Update Report to Committee](#)

13.2 To facilitate the Steering Group's actions and continual assessment of the Records Management Plan, information management sub-groups are already established.

- Records Management Working Group
- Information Sharing Working Group
- Training, Awareness and Communication Working Group
- Freedom of Information Working Group

All the sub-groups are coordinated and attended by the Information Governance Officer. Individual sub-group meetings are held and minutes and action plans are produced. The Senior Information Risk Owner chairs the Information Sharing Working Group.

13.3 The Council has already undertaken a self-assessment using the Archives and Records Management Services toolkit (ARMS). The Records Management sub-group will include a bi-annual self-assessment as part of its action plan.

13.4 A review of the Council's information governance arrangements was carried out in 2009 by the Council's Internal Audit service. The issues raised through the original review are monitored for completion by Audit Committee. As a result of the internal review, an Information Governance Steering Group was established to address the issues raised and the Chief Internal Auditor attends the working group. Actions are now being implemented in line with the recommendations and reported on a regular basis to Audit Committee.

[Audit Committee Reports on the Council's website](#)

- 13.5 As part of the Council's annual governance arrangements, Heads of Services undertake a self-assessment of compliance with the [Local Code of Governance](#) which includes an assertion of compliance with areas of information governance such as records management, information security and mandatory training. This is validated by the Chief Internal Auditor and any significant governance issues are included within the [Annual Governance Statement](#) which forms part of the Annual Accounts process. This is reviewed and validated by our external auditors.
- 13.6 The Council carried out an Information Governance Survey to all staff in October 2013. The survey was to find out staff understanding of information governance, whether the Council was doing enough to protect information, if information was being kept safe and ways we could improve the security of information. A follow up survey was undertaken in 2015 and is in the process of being analysed. This will take place annually as part of assessing the Information Governance and Management Framework.

ELEMENT 14: SHARED INFORMATION

- 14.1 The Council routinely shares information on its public facing website www.inverclyde.gov.uk and through requests made under the Freedom of Information (Scotland) Act 2002.
- 14.2 The Council also shares personal and confidential information with other organisations, relevant partner agencies and internally between its services under the terms of information sharing agreements. The Data Protection Act 1998 is the primary legislation for used for governing the majority of information sharing processes within the Council.
- 14.3 The Council has recently been reviewing its information sharing arrangements both internally and externally. The Council recognised there needs to be a more strategic approach and ensure work to improve data sharing issues is done on a corporate basis and is properly documented. These improvements will ensure we are fully compliant with Data Protection legislation.
- 14.4 An [Inverclyde Information Sharing Protocol](#) was approved at Committee in November 2015. Its purpose is to ensure consistency in approaching information sharing and to reflect our legal duties to share information appropriately, proportionately, legally and responsibly within the organisation and out with the organisation. The Protocol will ensure existing and proposed data sharing arrangements are consistent.

The Protocol was discussed at an Information Sharing Workshop on 15 April 2015 with agencies engaged in partnership working. The outcome of the workshop was for our Partners to agree to the principles contained in the Protocol.

- 14.5 The Council has an established Information Sharing Working Group who will be supporting development and delivery of the Information Sharing Protocol and following up the review.