

# **Records Management Strategy v1.0**

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## 1. Introduction

This document sets out a records management strategy for Bolton PCT. It outlines the need for records management in order to support the business of the PCT and to enable the PCT to meet its statutory obligations.

The document addresses the scope of records management, describes arrangements for accountability, defines objectives for the strategy and sets out the operational action needed to meet those objectives.

The strategy describes the 6 key areas for records management within the PCT:

- Records Management Programme
- Records Creation
- Records Storage & Retention
- Records Disposal
- Accountability
- Monitoring & Review

Bolton PCT is dependant on its documents and records to operate efficiently and account for its actions. The PCT has a statutory obligation to maintain accurate records of its activities and to make arrangements for their safekeeping and secure disposal. All records created in the course of the business of the PCT, both health and corporate records of whatever format and medium, are public records under the terms of the Public Records Act 1958.<sup>1</sup>

'For the Record' (HSC 1999/053) and 'The Preservation, Retention and Destruction of GP General Medical Services Records relating to Patients (HSC 1998/217)' provides guidelines for good practice in managing all types of NHS records and highlights the responsibilities of all staff for records they create or use.

The Data Protection Act 1988 now places statutory restrictions on the use of personal information including health information.

The Freedom of Information Act 2000 came into effect on 1<sup>st</sup> January 2005 and places a statutory obligation on all public bodies to disclose information when requested; given certain exemptions.

### 1.1 The Importance of Records Management

The PCT records are a vital component of its daily functions and operational activities. They provide evidence of actions taken and decisions made and are an essential resource for the Board when it is seeking assurance about the progress of the PCT against its principal objectives and risks.

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<sup>1</sup> Section 3 (1)-(2) and section 10 (3) Public Records Act 1958 HMSO 1958. This was amended by the Public Records Act 1967 and is to be further amended by the Freedom of information Act 2000 as of 1<sup>st</sup> January 2005.

Personal healthcare records are vital to ensure the safe and appropriate continuing care of service users. Records support continuity, efficiency and productivity in the PCT's work and help to ensure that services are delivered in a consistent and equitable way.

Records management, through the proper control of the content, storage and volume of records, reduces vulnerability to legal challenge or financial loss and promotes best value in terms of human and space resources through greater co-ordination of information and storage systems.

Recent legislation is also having a significant effect on record keeping arrangements in NHS organisations. The PCT must ensure that its policies and procedures meet the requirements of legislation and NHS standards and guidance including:

- Public Records Acts 1958 and 1967
- Access to Health Records Act 1990
- Data Protection Act 1998
- Freedom of Information Act 2000
- Lord Chancellor's code of practice on the management of records under s.46 of the Freedom of Information Act 2000
- HSC 1999/053 For the Record: Managing records in NHS Trusts and Health Authorities
- HSC 1999/012 Caldicott Guardians
- Controls Assurance Records Management Standard 2003
- NHS Litigation Authority Risk Management Standard (PCT) 2004
- NHS Information Authority Information Governance Toolkit 2004

## 2. Scope

This strategy applies to all records held by Bolton PCT and PCT owned GP practices. Corporate records such as financial, legal, human resources or other administrative documents are included e.g. policies and procedures in operation within the PCT, as well as health records.

Records not included are - health or other records held by its independent contractors and copies of documents created by other organisations such as the Department of Health kept for reference and information only. The strategy will be recommended to independent contractors as good practice.

A record is defined as 'anything which contains information (in any media) which has been created or gathered as a result of any aspect of the work of NHS employees'.<sup>2</sup>

A health record is defined as 'any record which consists of information relating to the physical or mental health or condition of an individual, and has been made by or on behalf of a health professional in connection with the care of that individual'.<sup>3</sup>

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<sup>2</sup> HSC/1999/053: For the Record

### 3. Accountability

The overall implementation of this strategy will be overseen by the IM&T Strategy Board.

The Chief Executive has overall responsibility for all records generated by the PCT and for ensuring that they are managed responsibly.

The Caldicott Guardian is responsible for approving and ensuring that national and local procedures and guidelines on the handling and management of confidential personal information are in place.

The Data Protection Manager is responsible for ensuring that the PCT complies with the Data Protection Act and acts as a resource for PCT staff.

The Document Control Manager is responsible for ensuring that practical guidance and advice on records management/document control, retention and disposal of records is available and that Freedom of Information requests are managed appropriately.

All Managers (at all levels) are responsible for ensuring that PCT policies and procedures are implemented in their directorates/departments, that all staff receive training appropriate to their need and information is provided when requested to meet the requirements of legislation and NHS standards.

All staff are responsible for ensuring that they keep appropriate records of their work for Bolton PCT and manage those records in accordance with this, and related documents.

### 4. Broad Objectives

To ensure that a systematic and planned approach to the management of all records is in place within Bolton PCT from the moment a record is created until its ultimate disposal.

To ensure that Bolton PCT can control both the quality and quantity of information it generates; can maintain that information in a manner that effectively services its needs and those of its patients and clients.

### 5. Specific Aims

#### 5.1 Records Management Programme

***A comprehensive organisational-wide records management programme should be in place that covers all records types (administrative as well as medical).***

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<sup>3</sup> Data Protection Act 1998

The records management programme should include:

- the management of non current as well as active records
- storage
- accessibility/availability for use
- environmental controls
- retention and disposal

A records management policy will be developed which is in line with National standards and legislation, and has been approved by the Board

A health records committee will be established with defined terms of reference, membership, frequency of meetings and reporting arrangements. The committee will be a sub committee of the Clinical Governance Committee and minutes from the meetings will be shared with the Information Governance Group and IM&T Strategy Board.

Consideration must be given to records management in relevant IM&T strategies and work programmes.

Training and profile raising of the records management programme should take place with appropriate staff groups to ensure they are aware of their responsibilities and the PCT policy on records management.

#### Verification

- A comprehensive records management policy approved by the Board
- Documented activity of the records management programme
- Evidence of documentation created by the health records committee
- Assessment of staff training needs
- Evidence of training provided
- Evidence of records management discussions in relation to other strategies and work programmes.

## **5.2 Record Creation**

***All PCT records created (administrative as well as medical) must be produced to a consistent standard and style, using an agreed corporate image and arranged in an appropriate record keeping system.***

Standard formats and templates are developed and guidance issued to staff on the use of them.

An audit will be conducted to ensure all PCT records/documents made available to the public are in the standard format; further audit will take place to ensure all records and documents throughout the PCT are in the standard format.

An appropriate document management system will be identified that will enable the PCT to obtain the maximum benefit from the quick and easy retrieval of information.

### Verification

- Templates and guidance for staff
- Evidence of audit taken place
- Evidence of document management system identified and progression to put them in place

## **5.3 Record Keeping**

***All PCT records must be kept in line with national standards and legislation.***

Record keeping guidance will be developed in line with national standards/legislation and in conjunction with the Records Management Policy.

An audit will be conducted across the PCT services to look at what clinical records and administrative systems the PCT has, in what form and their accessibility.

All PCT policies and procedures must have applied review dates, to ensure up to date information is made available to staff and the public (under the Freedom of Information Act 2000).

### Verification

- Record Keeping guidance
- Evidence of dissemination to staff
- Evidence of audit and reports
- Database of documents available on the website for staff and public use, including review dates

## **5.4 Record Storage and Retention**

***All PCT records must be appropriately stored and retained in accordance with national guidelines and legislation.***

An audit will be conducted across the PCT services to look at current storage facilities and locations of records and identify any retention periods that are in place. Further audit will be considered, at checking storage and compliance with Health & Safety regulations.

A report will be produced to inform relevant PCT Committees and groups of the storage and retention position within the PCT. Recommendations will be made where necessary to ensure the PCT is in line with current guidelines and legislation.

Work will be carried out to identify records that require archiving, the most appropriate way to carry this out and proposals for future archiving of both manual and electronic records.

Information and guidance regarding storage and retention of PCT records will be included in the PCT Records Management Policy.

PCT contingency plans or disaster recovery plan will consider protection for those records identified as vital to the continued functioning of the PCT.

#### Verification

- Evidence of audit and feedback to relevant committees/groups.
- Evidence of archiving, discussion and future proposals
- Storage and retention guidelines included in Records Management Policy
- PCT contingency plans or disaster recovery plan

### **5.5 Records Disposal**

***All PCT records should be disposed of in line with PCT guidelines. Staff must be made aware of their responsibilities to review records and dispose of in the appropriate manner.***

Procedures will be put in place for the secure disposal of records that are no longer required and will include those records that are transferred to another organisation, thus disposing of the record.

Records must be identified by the relevant PCT committee or groups which will have details of their disposal recorded. A database is to be developed to hold this information centrally.

A method of marking records (where appropriate) that are permanently preserved will be agreed and implemented.

Procedures will disseminated to all PCT staff on their responsibilities regarding the disposal of records.

#### Verification

- Secure Disposal Procedures developed and disseminated to staff
- Evidence of discussions had regarding identification of records to be disposed and recorded, marking records to be permanently preserved.

### **5.6 Accountability**

***Clear lines of accountability should be established throughout the PCT for the management of records.***

Board level responsibility for records management should be clearly defined with clear lines of accountability for records management throughout the organisation, leading to the Board.

The Caldicott Guardian liaises closely with appropriate person(s) responsible for records management.

A Senior Manager is responsible for coordinating, publicising implementing and monitoring the records management strategy, reporting to the Board on a regular basis.

All managers must ensure that staff are aware of their personal responsibilities for record management. This includes the creation, use, storage, security and confidentiality of records.

#### Verification

- Evidence of agreed accountability in Board minutes
- Evidence of communication between Caldicott Guardian and person(s) responsible for Records Management
- Job descriptions / written responsibility
- Board Reports
- Recorded evidence of staff awareness

### **5.7 Monitoring & Review**

***Records management is monitored and reviewed by management and Board annually.***

Appropriate systems should be in place to review and monitor records management in order to make improvements. The review should include accountability arrangements, developments set out in the strategy, compliance to the policy and training arrangements.

Consideration should be made to internally audit aspects of the strategy and policy within the PCT.

#### Verification

- Schedule of planned reviews/internal audit
- Copy of reports to Board
- Evidence of discussion with relevant committees and groups
- Action Plans and notes

## 6.0 Action Plan

Strategic Aim	Action	Standards	Progress	By Whom
<b>Records Management Programme</b>	Develop records management policy in line with National standards and legislation  Records management policy approved by the Board	Lord Chancellor's code of practice on the management of records under s.46 of the Freedom of Information Act 2000		S Bell
	Establish health records committee with defined terms of reference, membership, frequency of meetings and reporting arrangements.	Standards for Better Health – C9  (DOH) Information Governance Toolkit –411, 8607, 8900		
	Identify other PCT strategies and work programmes to ensure where appropriate – records management has been considered.	NHSLA – 1B  CNST – Standard 4		
	Identify and develop training for appropriate staff groups  Carry out profile raising of the PCTs records management programme	Controls Assurance Standard - 2, 5, 6, 7  HSC 1999/053 – For the Record		
<b>Records Creation</b>	Develop standard formats and templates for PCT documents / records	(DOH) Information Governance Toolkit – 7403		
	Carry out audit of existing documents / records to checking the format. Ensure all documents / records are in the standard format	HSC 1999/053 – For the Record  Lord Chancellor's code of practice on		

	Identify appropriate document management system to enable the PCT quick and easy retrieval of information	the management of records under s.46 of the Freedom of Information Act 2000 Part 1, section 8  Controls Assurance Standard – 5, 6, 8.		
<b>Record Keeping</b>	Develop record keeping guidance in-line with national standards/legislation, in conjunction with the records management policy.	Lord Chancellor's code of practice on the management of records under s.46 of the Freedom of Information Act 2000 Part 1, section 8		
	Carry out audit to identify clinical and operational records, administrative systems - in what form and their accessibility.	HSC 1999/053 – For the Record		
	Identify policies and procedures that do not have review dates.  Create database to store information collected and aid retrieval.  Contact authors to review documents and apply review dates.	Controls Assurance Standard –5, 6, 8  CNST – Standard 4  Standards for Better Health – C9  NHSLA – 1a		
<b>Record Storage &amp; Retention</b>	Carry out audit to look at current storage facilities and locations of records, identifying retention periods in place.  Report produced from information regarding storage and retention within the PCT, making recommendation where necessary.	Lord Chancellor's code of practice on the management of records under s.46 of the Freedom of Information Act 2000 Part 1, section 8  HSC 1999/053 – For the Record		

	<p>Look to identify records that require archiving.</p>	<p>Controls Assurance Standard –5, 6, 8</p>		
	<p>Develop guidance regarding storage and retention for PCT staff and include them in the records management policy.</p> <p>Formal agreement of retention periods.</p>	<p>CNST – Standard 4</p> <p>Standards for Better Health – C9</p> <p>NHSLA – 1a &amp; 1b</p> <p>(DOH) Information Governance Toolkit - 604, 7406, 7600, 7606</p>		
<p><b>Records Disposal</b></p>	<p>Develop procedures for the secure disposal of PCT documents and records that are no longer required.</p> <p>Decide what documents and records will need the disposal of them recorded.</p> <p>Develop database to hold disposal records.</p>	<p>Lord Chancellor’s code of practice on the management of records under s.46 of the Freedom of Information Act 2000 Part 1, section 9</p> <p>HSC 1999/053 – For the Record</p>		
	<p>Identify, agree and implement a method of marking records that are permanently preserved.</p>	<p>Controls Assurance Standard – 5, 6, 8</p> <p>Standards for Better Health – C9</p>		
	<p>Dissemination of procedures agreed, to all PCT staff</p>	<p>NHSLA – 1b</p> <p>(DOH) Information Governance Toolkit - 604</p>		

<p><b>Accountability</b></p>	<p>Clear lines of accountability for records management established throughout the PCT leading to the Board</p>	<p>Lord Chancellor's code of practice on the management of records under s.46 of the Freedom of Information Act 2000 Part 1, section 5</p>		
	<p>Identify senior manager responsible for coordinating, monitoring, publicising and implementing records management strategy</p> <p>Reports to the Board on a regular basis</p>	<p>HSC 1999/053 – For the Record</p> <p>HSC 19/012 – Caldicott Guardians</p>		
	<p>Promote records management throughout the PCT making clear responsibilities of staff</p>	<p>(DOH) Information Governance Toolkit - 412</p>		
<p><b>Monitoring &amp; Review</b></p>	<p>Identify process to review and monitor records management programme</p>	<p>Controls Assurance Standard – 9 &amp; 10</p>		
	<p>Consider internal audit of aspects of the records management programme.</p> <p>Identify those areas which could be audited and process to carry audit out.</p>	<p>Lord Chancellor's code of practice on the management of records under s.46 of the Freedom of Information Act 2000 Part 1, section 6</p> <p>HSC 1999/053 – For the Record</p>		