RECORDS MANAGEMENT POLICY

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Executive Summary

This Policy applies to all Leeds General Practice Confederation staff and contractors undertaking work on behalf of the Confederation. It applies to all records regardless of format or the recordkeeping system in use.

This policy and supporting guidance provides the framework to enable the efficient and effective management of records, ensuring information remains as an asset to the Confederation by;
- Protecting the content, context and structure of records to meet business needs and stakeholder requirements.
- Promoting recordkeeping practices and systems, so far as practicable, to comply with guidance from the Information Commissioner, NHS institutions and professional standards and including ISO 5489: 2016 and BS 10008: 2014.
- Clearly defining responsibilities and accountability for records;
- Embedding information management procedures/practices that conform to applicable legislative and statutory requirements.

Information Asset Owners are responsible for the dissemination of this policy and for providing adequate training; ensuring processes and procedures are documented to ensure that records and data are;
- Reliable/Accurate,
- Complete,
- Useable, over period they are required,
- Accessible, with appropriate controls,
- Fixed, providing an audit for modifications
- Validity, identification of true source.

Contents

1   Introduction

A record is a piece of information produced or received in the initiation, conduct or completion of an institutional or individual activity. It comprises sufficient content, context and structure to provide evidence of the activity. It contains information that is worthy of preservation in the short, medium or long term.

Records Management is the process by which organisations manage all the aspects of records they use, whether internally or externally generated and in any format or media type, from their creation or collection, through their life cycle to their eventual disposal.

The Leeds GP Confederation recognise that effective records management systems will help ensure that records provide value by;
- Promoting efficiency and effectiveness: enabling staff to find the information needed, at the right time.
- Protecting individuals and the Confederation: providing evidence that is legally admissible.
- Promoting trustworthiness and establishing confidence with stakeholders.
- Reducing physical and digital costs.
- Providing for consistency across Confederation departments.

The aims of The Leeds GP Confederation records management systems, whether hard copy or electronic are that;
- The record is present: the Confederation has the information that is needed to form a reconstruction of activities or transactions that have taken place;
- The record can be accessed: information can be located, accessed and displayed in a way consistent with the initial use, and the current version is identified where multiple versions exist.
- The record can be interpreted: the context of the record can be established: who created the document and when, during which business process, and how the record is related to other records.
- The record can be trusted: the record reliability represents the information that was actually used in or created by the business process, and its integrity and authenticity can be demonstrated.
- The record can be maintained through time: the qualities of accessibility, interpretation and trustworthiness can be maintained for as long as the record is needed.

This policy and supporting guidance provides the framework to enable the efficient and effective management of records, ensuring information remains as an asset to the Confederation.

2   Purpose

The purpose of this policy is to ensure that The Leeds GP Confederation;
- Protect the content, context and structure of records to meet business needs and stakeholder requirements.
- Promote recordkeeping practices and systems, so far as practicable, to comply with guidance from the Information Commissioner, NHS institutions and professional standards and including ISO 5489: 2016 and BS 10008: 2014.
- Clearly define responsibilities and accountability for records;
- Operates records management procedures and practices that confirm to applicable legislation.

3   Scope
This policy applies to all staff including Confederation staff, temporary staff, seconded staff, contractors and others undertaking work on behalf of the Confederations. It covers all records created, received or maintained by staff in the course of carrying out their corporate functions.

4   Definitions
This policy is written to be understood without the need to clarify definitions. In support materials published by the information governance team, a list of terms and definitions that related to information management is available.

5   Duties
All NHS records are public records under the terms of the Public Records Act 1958 2.3(1)-(2). The Act sets out broad responsibilities for everyone who works with such records and provides guidance and supervision.

The Information Governance Group reports, advises and provides direction to the Confederation in meeting its corporate responsibilities to maintain it records and recordkeeping systems in accordance with regulatory environment.

Chief Officer
Has overall accountability for records management across The Leeds GP Confederation and has overall responsibility for establishing and maintaining an effective document management system, for meeting all statutory requirements and adhering to guidance issued in respect of procedural documents.

Senior Information Risk Owner (SIRO)
The Confederations SIRO is responsible for approving and ensuring that national and local guidelines/protocols on the handling and management of information are in place.

The SIRO is responsible to the Governing Body for ensuring that all Information risks are recorded and mitigated where applicable. The Confederations SIRO is responsible for ensuring that all record management issues (including electronic media) are managed in accordance with this policy.

Caldicott Guardian
The Caldicott Guardian is responsible for ensuring that national and local guidelines on the handling of confidential personal information are applied consistently across the organisation. They are responsible for ensuring patient identifiable information is shared in an appropriate and secure manner.

Data Protection Officer
Has a particular responsibility in ensuring that the Confederation meets it's legal responsibilities with regards to information governance and compliance with the Data Protection Act 2018, GDPR, Freedom of Information Act 2000 and the Environmental Information Regulations 2004.

Information Governance Group
Is responsible for liaising with Asset Owners, Asset Administrators and Departmental Leads for providing guidance, support and training to Confederation staff and partner organisations where agreed. The team are responsible for the monitoring of activity to standards, conducting audits, the application of toolkits and for advising on matters to be compliant with information legislation.

Directors/Senior Managers/Information Asset Owners

Directors, Senior Managers and Information Asset Owners are responsible for the quality and implementation of records management within their department. They have responsibility for disseminating information related policies, guidance and must ensure completeness of the Asset Register and associated recordkeeping and governance processes.

Staff

All staff are responsible for the records they create, receive or use in the course of their duties and are required to act in accordance with the principles of this policy. They must ensure that the records they manage are;

- fit for purpose;
- accurate;
- appropriately secure;
- accessible within defined access restrictions;
- maintained in line with the Confederation records management procedure and guidelines.

6   Policy Statements

The Confederation Asset Owners will arrange for;

- records to be treated as a valuable resource, ensuring their inclusion within the Information Asset Register.
- the efficient capture, retrieval and disposal of records.
- Identification of records that are vital for business continuity.
- Keeping appropriately complete, authentic, reliable, secure and accessible records of what the Confederation does.
- the management of records to comply with regulations and legal requirements including but not limited to Data Protection Act 2018, General Data Protection Regulations, Freedom Of Information Act 2000, Human Rights Act 1998 and the Common Law Duty of Confidentiality.
- Identification and recording of all record management systems, ensuring that appropriate operating instructions are available.
- arrangements for disaster recovery and business continuity.
- staff to develop key information management skills.
- all staff, including agency and temporary staff, students, volunteers and non-executive staff to complete mandatory training.

This policy should be applied in conjunction with published guidance/policies from;

- NHS Organisations including NHS Mail,
- Information Governance Alliance, The Records Management Code of Practice for Health and Social Care 2016.
- The National Archives.
- Information Commissioners Office.

7   Equality Impact Assessment (EIA)

This policy applies to all employees, Governing Body members and members of Leeds Clinical Commissioning Group irrespective of age, race, colour, religion, disability, nationality, ethnic origin, gender, sexual orientation or marital status, domestic circumstances, social and employment status, HIV status, gender reassignment, political affiliation or trade union membership.

A full Equality Impact Assessment is not considered to be necessary as this policy will not have a detrimental impact on a particular group.

8   Implications and Associated Risks

All risks relating to projects implementing or changing recordkeeping systems should be reported into the appropriate project risk register. Significant risks being added to the Confederation Risk Register.

All risks in relation to potential or actual information breeches should be reported through the incident reporting system, DATIX and raised with the Data Protection Officer.

9   Education and Training Requirements

All line managers must ensure that their teams/staff, whether administrative or clinical, are adequately trained and apply the appropriate guidelines, that is, they must have an up-to-date knowledge of the laws and guidelines concerning confidentiality, data protection and records management.

All staff are responsible for completing mandatory training that is applicable to their role, in relation to recordkeeping, information governance and cyber security

10   Monitoring Compliance and Effectiveness

The Head of Information governance in liaison with Asset owners, Directors and Senior Managers will promote and assist with the implementation of this policy. This will include;
- The policy being published on the extranet and highlighted through bulletins, team briefings and other established channels of communication
- Delivery of training and support, to meet mandatory and individual needs.
- Compliance and effectiveness being monitored through the completion of audits, toolkits and reporting.
- Monitoring and auditing undertaken by the Informatics department and through assigned applications/services.
- Breeches of this policy being investigated and may result in the matter being treated as a disciplinary offence under the Confederation disciplinary procedure.

11   Associated Documentation

This policy should be read in conjunction with other The Leeds GP Confederation information related policies:
- Confidentiality and data protection
- Information Governance Policy and Management Framework
- Freedom of Information Act
- Information Security
- Information Handling
- Network Security
- Risk Management
- Incident Reporting
- Business Continuity Plan

And their associated operating materials (including but not limited to):
- Subject Access Request (Access to Health Records) procedure
- Information Sharing Protocol
- Freedom of Information procedure
- Data Protection Impact Assessment procedure
- Safe Transfer Guidelines and Procedure
- Retention and Disposal Schedule
- Recordkeeping guidance and procedures.
- Information Governance Staff Handbook

Appendix A: Policies, Legislation and Guidance relating to the management of The Leeds GP Confederation records.
Recordkeeping standards
ISO 15489: 2016
BS10008: 2014

Statutory and Legal requirements
- Data Protection Act 2018, DPA 2018
- General Data Protection Regulations, GDPR
- Human Rights Act 1998
- The Public Records Act 1958
- The Freedom of Information Act 2000, FoI Act 2000
- Access to Health Records Act 1990

Policies and best practice
- The Caldicott Report
- The Information Governance Review; 'Caldicott 2'
- Information: 'To share or not to share', (the government response to Caldicott 2)
- HSCIC: A Guide to Confidentiality in Health and Social Care
- NHS Care Record Guarantee
- NHS England Policies
- NHS Mail Policies
- IGA, Records Management Code of Practice for Health and Social Care 2016

Appendix B   Policy Consultation Process:

Title of document	Records Management Policy
Author	Shaun Beckingham
New / Revised document	Significant rewrite of the Records Management and Information Lifecycle policy
Lists of persons involved in developing the policy List of persons involved in the consultation process:	