

RECORDS MANAGEMENT STRATEGY

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Records Management Steering Group	1 September 2009
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INTRODUCTION

1.1 This document sets out an overarching framework for integrating current records management initiatives, as well as recommending new ones. It defines a strategy for improving the quality, availability and effective use of records in the Trust and provides a strategic framework for all records management activities. This will enable overall coordination of all records management activities and ensure alignment with the Trust's business strategies.

1.2 The Records Management Strategy should be read in conjunction with the:-

- Code of Conduct for Employees in Respect of Confidentiality
- Archive Policy and Procedure – Paper Records
- Records Management Policy
- Clinical Records Management Policy
- DoH Records management: NHS code of practice
- [Lord Chancellor's Code of Practice on the management of records issued under section 46 of the Freedom of Information Act 2000](#)

2.0 SCOPE

This policy relates to all operational records.

Operational records are defined as information, created or received in the course of business, and captured in a readable form in any medium, providing evidence of the functions, activities and transactions. They include:

- patient health records (electronic or paper based, including those concerning all specialties, and GP medical records);
- records of private patients seen on NHS premises;¹
- Accident & Emergency, birth, and all other registers;
- theatre registers and minor operations (and other related) registers;
- administrative records (including, for example, personnel, estates, financial and accounting records; notes associated with complaint-handling);
- X-ray and imaging reports, output and images;
- photographs, slides, and other images;
- microform (i.e. microfiche/microfilm);
- audio and video tapes, cassettes, CD-ROM etc;
- e-mails;
- computerised records;
- scanned records;
- text messages (both outgoing from the NHS and incoming responses from the patient)
- paper records including staff diaries, work and message books

¹ Although technically exempt from the Public Records Act it would be appropriate for NHS organisations to treat such records as if they were not so exempt.

- Prescriptions returned from the PPA (Prescription Pricing Authority)

They do not include copies of documents created by other organisations such as the Department of Health, kept for reference and information only

3.0 AIMS

3.1 The aims of the Trust's Records Management Strategy are to ensure:

- a systematic and planned approach to records management covering records from creation to disposal
- efficiency and best value through improvements in the quality and flow of information, and greater coordination of records and storage systems
- compliance with statutory requirements
- awareness of the importance of records management and the need for responsibility and accountability at all levels
- Appropriate archiving of the Trust's records

4.0 KEY ELEMENTS

4.1 The Records Management Strategy comprises the following key elements:

4.1.1 Responsibility and Accountability

To provide a clear system of accountability and responsibility for record keeping and use

It is important that all individuals in the Trust appreciate the need for responsibility and accountability in the creation, amendment, management, storage of and access to all Trust records. A major target is therefore to have a clear chain of managerial responsibility and accountability for all records created by the Trust. This is the prerequisite for an effectively coordinated records management strategy.

4.1.2 Record Quality

To create and keep records which are adequate, consistent, and necessary for statutory, legal and business requirements

Trust records should be accurate and complete, in order to facilitate audit, fulfil the Trust's responsibilities, and protect its legal and other rights. Records should show proof of their validity and authenticity so that any evidence derived from them is clearly credible and authoritative.

4.1.3 Management

To achieve systematic, orderly and consistent creation, retention, appraisal and disposal procedures for records throughout their life cycle

Record-keeping systems should be easy to understand, clear, and efficient in terms of minimising staff time and optimising the use of space for storage.

4.1.4 Security

To provide systems which maintain appropriate confidentiality, security and integrity for records in their storage and use.

Records must be kept securely to protect the confidentiality and authenticity of their contents, and to provide further evidence of their validity in the event of a legal challenge.

4.1.5 Access

To provide clear and efficient access for employees and others who have a legitimate right of access to Trust records, and promote compliance with Access to Health Records, Data Protection and Freedom of Information legislation

Access is a key part of any Records Management Strategy. Fast, efficient access to records unlocks the information and knowledge they contain.

4.1.6 Audit

To audit and measure the implementation of the records management strategy against agreed standards

The performance of the records management programme will be audited by CW Audit Services. This will be arranged by the Head of Information Governance.

4.1.7 Training

To provide training and guidance on legal and ethical responsibilities and operational good practice for all staff involved in records management

Effective records management involves staff at all levels. Training and guidance enables staff to understand and implement policies, and facilitates the efficient implementation of good record keeping practices. Effective and appropriate training is available to all members of staff via the NHS Connecting for Health IG Training Tool.

IMPLEMENTATION

5.1 An action plan will be developed to implement the Strategy. The following fundamentals will be included in the action plan

- existence of an overall policy statement on how records (including electronic records) are to be managed
- endorsement of policy by senior management
- dissemination of policy to staff at all levels
- organisational commitment to create, keep and manage records which document activities
- definition of roles and responsibilities
- definition of responsibility of personnel to document actions and decisions in the records and to dispose of obsolete records
- provision of framework for supporting appropriate standards, procedures and guidelines
- provision of monitoring mechanisms to ascertain compliance with appropriate standards, procedures and guidelines
- Review of policy in line with Trust Guidance

6.0. REVIEW

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

7.0 DISSEMINATION AND ARCHIVING

This Strategy will be published on the PCT Internet and Intranet. It is the responsibility of line managers to ensure that members of staff are made aware of this Strategy. New members of staff are advised during their induction process to look at the PCT Internet and Intranet to ensure that they read and have a good working knowledge of all relevant policies, strategies, procedures and guidelines.

Previous versions of this policy will be archived in accordance with PCT policy.

All Staff are strongly discouraged from printing off or photocopying this policy and should understand that the Internet version of this policy is the definitive version.

8.0 MONITORING THE EFFECTIVENESS OF THE STRATEGY

The Records Management Steering Group will lead in monitoring the effectiveness of the Strategy by ensuring that regular updates are provided to the Information Governance Steering Group. This will include the progress of the action plan. Part of the monitoring will be to determine whether the policy needs to be updated before the expiry date to reflect any new legislation or best practice.

Your Equality Impact Assessment Report should demonstrate what you do (or will do) to make sure that your function/policy is accessible to different people and communities, not just that it can, in theory, be used by anyone.

1. Name of policy or function – **Records Management Strategy**
2. Responsible Manager – **Richard Stringfellow**
3. Date EIA completed – **20 May 2010**
4. Description of aims of function/policy :-

The Strategy Recommends guidance on:-

- a systematic and planned approach to records management covering records from creation to disposal
- efficiency and best value through improvements in the quality and flow of information, and greater coordination of records and storage systems
- compliance with statutory requirements
- awareness of the importance of records management and the need for responsibility and accountability at all levels
- Appropriate archiving of the Trust's records

5. Brief summary of research and relevant data –

- Code of Conduct for Employees in Respect of Confidentiality
- Archive Policy and Procedure – Paper Records
- Records Management Policy
- Clinical Records Management Policy
- DoH Records management: NHS code of practice
- [Lord Chancellor's Code of Practice on the management of records issued under section 46 of the Freedom of Information Act 2000](#)

6. Methods and outcomes of consultation –

- Records Management Steering Group
- Information Governance Steering Group
- Provider Services Quality and Safety Committee
- Quality and Patient Safety Assurance Committee

**7. Results of Initial Screening or Full Equality Impact Assessment -
None**

Initial or Full Equality Impact Assessment?	
Equality Group	Assessment of Impact
Race	NONE
Gender	NONE
Disability	NONE
Age	NONE
Sexual Orientation	NONE
Religion or Belief	NONE
Human Rights	NONE

8. Decisions and or recommendations - **NONE**

9. Equality action plan (if required) - **NONE**

10. Monitoring and review arrangements (include date of next full review)

The Records Management Steering Group will lead in monitoring the effectiveness of the Strategy by ensuring that regular updates are provided to the Information Governance Steering Group. This will include the progress of the action plan. Part of the monitoring will be to determine whether the policy needs to be updated before the expiry date to reflect any new legislation or best practice.

Department	Information Governance
Directorate	Corporate Services
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