

Records Management – Policy (11.2)

1. Introduction

The Practice needs to know where all the information is to enable it to function and meets its statutory responsibilities.

The Freedom of Information Act 2000 requires all public organisations to implement exemplar Code of Practice for Records Management based on the mandatory Code of Practice developed by the Lord Chancellor's Office under Section 46 of the Act.

This policy has been produced to ensure that information held within the Practice is readily identifiable and accessible to all those who have a legitimate need to see it do their job.

2. Regularity Framework

There is a direct and indirect regulatory framework governing Records Management:

2.1 Direct

- Section 46 of the Freedom of Information Act 2000
- The Lord Chancellor's Code of Practice
- Code of Openness in the NHS (1995)
- Public Records Act (1958)
- Welsh Health Circular (WHC) (99)7 – Preservation, Retention and Destruction of GP General Medical Services Records relating to Patients
- Welsh Health Circular (WHC) (2000) 71 – For the Record

2.2 Indirect – good practice under:

- The Caldicott Report 1997
- The Data Protection Act 1998
- The Human Rights Act
- The Medical Records Act Principles
- The NHS Baseline IT Security Standards
- Department of Health, Records Management: Code of Practice (2006)

3. Scope

This policy applies to all staff within the Practice.

4. Guiding Principles

- 4.1 Records Management will be the responsibility of the Lead GP
- 4.2 Records containing personal or patient identifiable information will be managed in accordance with the principles of the Data Protection Act.
- 4.3 The Practice Manager will create a File Structure to enable the Practice to operate efficiently, and to provide an administrative context for effective management of records
- 4.4 The Practice Manager must create an Electronic Central File and Tracking Index (CFTI) to record the location of all records held by the Practice, including Patient Medical records
- 4.5 The CFTI must contain details of all manual and computerised records created by the Practice.
- 4.6 A nominated staff member will be responsible for the management and maintenance of the Central File Tracking Index.
- 4.7 The Practice Manager must introduce a common file naming convention to be used for both paper and computerised records, with the file reference distinguishing between the type of record.
- 4.8 The Central File Tracking Index must be able to identify the type of record, its classification (reference Information and I.T Security Toolkit, section 2.2.1), and where it is located at all times.
- 4.9 Every member of staff must update the CFTI with details of:
- Every new file created
 - Every file moved to different rooms or cabinets
 - Every file sent to the Business Service Centre
 - Every file or part record transferred or destroyed
- 4.10 **Manual (Paper) Records**
- 4.10.1 The Practice Manger will develop the procedure for managing Manual (Paper) Records
- 4.11 **Electronic (Computer) Records**
- 4.11.1 The Practice Manager will develop the procedure for managing Electronic (Computer) Records and including emails
- 4.12 **Retention and Destruction of Records**
- 4.12.1 Retention and destruction of records must be managed within the ruling NHS Guidelines – currently WHC (99) 7 and WHC (2000) 71, and the conditions of the Lord Chancellor’s Code of Practice.

4.12.2 Records that have to be kept under the limitation act should be properly labelled and placed in a separately designated section of the manual or electronic record storage area (whichever is applicable).

4.12.3 All records archived must be properly labelled by type, basic content and retention period.

5 Responsible Officers

5.1 The Lead GP must ensure that the resources devoted to records management are adequate for the work necessary. Management of the process will need to include the following (or personnel carrying out the duties) professional leads:

- Data Protection Officer
- Security Officer
- Systems Manager
- Caldicott Guardian

5.2 All aspects of the records management system must be reviewed at least annually

6 Training

6.1 Every member of staff, including temporary or agency staff, will be required to attend a Records Management Awareness Session. This should form part of the Induction Process for permanent staff.