Northern Ireland

mdta

Medical & Dental Training Agency

POLICY DOCUMENT

Records Management Strategy

incorporating: Records Management Policy - Appendix B

                  Records Management Disposal Schedule – Appendix C

2016 – (Version 5.0)

CS>SMT>G&R>Board

Policy Review Schedule

Date first Approved by the Board: 26 January 2006

Last Approved by the Board: January 2016

Date of Next Review: January 2018

Amendment Overview

Version	Date	Pages	Comments	Actioned
2006 - 1.0 (Draft)	December 2005		Produced for initial consultation and feedback	Margot Roberts
2006 - 1.0 (Draft)	January 2006		Prepared for presentation to Board. **Approved**	Margot Roberts
2009 - 2.0 (Draft)	10/06/2009		Corrections and updates made to Strategy. Proforma page updated in accordance with NIMDTA template.	Margot Roberts / Mark Oliver
2009 - 2.0 (draft)	18/06/2009		**Re-approved** by NIMDTA Board	
2009 - 2.0	04/08/2009		Re-issued to staff	
2012 - 3.0 (Draft)	01/2012		Document reviewed and revised with amendments.	Mark Oliver
2012 - 3.0	23/02/2012		Presented to and **approved** by NIMDTA Board	
2012 – 3.1	01/10/2013	23	Reformatted to NIMDTA Corporate policy template	Linda Craig
2014 – 4.0	17/02/2014	4, 5	Reviewed. Role of NIMDTA updated.	Mark Oliver
2014 – 4.0	25/02/2014	25	Presented to G&R Committee for approval. **Approved.**	
2014 – 4.0	27/02/2014	25	Presented to NIMDTA Board for approval. **Approved.**	
2014 – 4.0	11/03/2014	25	Presented to Extra-Ordinary meeting of NIMDTA Board for approval. **Approved** subject to minor changes.	
2014 -4.1	12/03/2014		Minor changes made as per NIMDTA Board recommendations.	

2016 – 5.0	08/01/2015	7, 15	Removal of reference to Records Management Controls Assurance (replaced by Information Management) and Sharepoint included under 6.5	Mark Oliver
2016 – 5.0	21/01/2016		Reapproved by G&R Committee.	
2016 – 5.0	26/01/2016		Reapproved by NIMDTA Board.	

Contents

Role of the Northern Ireland Medical and Dental Training Agency

The Northern Ireland Medical and Dental Training Agency (NIMDTA) is an Arm's Length Body sponsored by the Department of Health, Social Services and Public Safety (DHSSPS) to train postgraduate medical and dental professionals for Northern Ireland. NIMDTA seeks to serve the government, public and patients of Northern Ireland by providing specialist advice, listening to local needs and having the agility to respond to regional requirements.

NIMDTA commissions, promotes and oversees postgraduate medical and dental education and training throughout Northern Ireland. Its role is to attract and appoint individuals of the highest calibre to recognised training posts and programmes to ensure the provision of a highly competent medical and dental workforce with the essential skills to meet the changing needs of the population and health and social care in Northern Ireland.

NIMDTA organises and delivers the recruitment, selection and allocation of doctors and dentists to foundation, core and specialty training programmes and rigorously assesses their performance through annual review and appraisal. NIMDTA manages the quality of postgraduate medical and dental education in HSC Trusts and in general medical and dental practices through learning and development agreements, the receipt of reports, regular meetings, trainee surveys and inspection visits. It works in close partnership with local education providers to ensure that the training and supervision of trainees support the delivery of high quality safe patient care.

NIMDTA recognises and trains clinical and educational supervisors and selects, appoints, trains and develops educational leaders for foundation, core and specialty medical and dental training programmes throughout NI.

NIMDTA is accountable to the General Medical Council (GMC) for ensuring that the standards set by the GMC for medical training, educational structures and processes are achieved. The Postgraduate Medical Dean, as the 'Responsible Officer' for doctors in training, has a statutory role in making recommendations to the GMC to support the revalidation of trainees. Revalidation is the process by which the GMC confirms that doctors are up to date and fit to practice. NIMDTA also works to the standards in the COPDEND framework for the quality development of postgraduate Dental training in the UK.

NIMDTA enhances the standard and safety of patient care through the organisation and delivery of relevant and valued career development for general medical and dental practitioners and dental care professionals. It also supports the career development of general medical practitioners and the requirements for revalidation through the management and delivery of GP appraisal.

NIMDTA aims to use the resources provided to it efficiently, effectively and innovatively. NIMDTA's approach to training is that trainees, trainers and educators should put patients first, should strive for excellence and should be strongly supported in their roles.

Policy Influence

This policy has been influenced by the following:

- HSC Records as defined in the Public Records Act (NI) 1923 and Disposal of Documents (NI) Order 1925
- Good Management, Good Records
- HSC Controls Assurance Standard
  - (Source: Standards Australia (1999) Risk Management. AS /NZS 4360:1999. Standards Association of Australia. Strathfield. P3)
- Data Protection Act 1998
- Freedom of Information Act 2000

Policy Impact

This policy may have an impact on the following:

- Records Management Policy
- Records Management Disposal Schedule

1. Introduction

In 2004 guidance was produced by the Department of Health, Social Services and Public Safety to be used as the basis for the record management activities of HSC bodies. The guidance was revised and reissued in January 2012. and sets out the legal obligations of Health and Social Care [HSC] organisations to keep proper records and explains the actions needed from Chief Executives and other managers to fulfil these obligations.

1.1 Records covered by this Guidance

This guidance applies to HSC Records as defined in the Public Records Act (NI) 1923 and Disposal of Documents (NI) Order 1925. It applies to records of all types regardless of the medium in which they are held (for example electronic or paper-based, audio and video tapes, slides, photographs etc)

1.2 Recommended Actions

Each HSC organisation should draw up a records management strategy to ensure that the following areas are covered:

- A Policy Statement

- Records Management Procedures

- Staff Training

- Disposal Schedule

- Records Management Performance monitoring

- Each HSC organisation should identify a specific senior manager responsible for co-ordinating, publicising and monitoring implementation of the records management strategy.

2. Background

The Chief Executive and Senior Managers of all HSC organisations are personally accountable for records management within their organisation and have a duty to make arrangements for the safe keeping of those records under the overall supervision of the keeper of Public Records. A number of other statutory and local issues influence records management including the following:

The Data Protection Act 1998 and the Freedom of Information Act 2000 requires that all HSC organisations can identify, locate or account for data subject access and Freedom of Information enquiries.

The Northern Ireland Medical and Dental Training Agency Records Management Strategy sets out the local requirements based on the guidance from the DHSSPS. It aims to incorporate good practice whilst setting out recommendations for actions.

3. Policy Statement

NIMDTA is committed to a systematic and planned approach to the management of records within the organisation, from their creation to their ultimate disposal. This will ensure that NIMDTA can control both the quality and quantity of the information that it generates; it can maintain that information in an effective manner; and it can dispose of the information efficiently when it is no longer required (Appendix B).

4. Aims and Objectives

The Records Management Strategy aims to set out clearly NIMDTA's approach to Records Management and will provide the framework for developing good records management in accordance with 'Good Management, Good Records' and the HSC Controls Assurance Standard.

5. Scope of the Strategy

The international standard of managing records, ISO 15489 defines a record as *"information created, received and maintained as evidence or information by an organisation or person, in pursuance of legal obligation or in transaction of business."*

In the context of this strategy a record is any recorded information that contains information, electronic or in paper, in any media which is created, collected, processed, used, stored and/or disposed of by NIMDTA's employees, as well as those acting as its agents in the course of NIMDTA business. The strategy applies to health and social services records as well as corporate records.

6. Strategic Aims

Strategic aims, outline action plans and outcomes are set out below:

6.1 Record Keeping

Strategic Aim

Development and training in record keeping will be given a priority in records management.

Record keeping applies to electronic as well as manual records and the value of the information is only as good as that recorded.

Senior Managers need to take more responsibility for ensuring that records produced by their staff are standardised to comply with the needs and requirements of the service. In addition to guidance issued by professional bodies the Public Record Office of Northern Ireland (PRONI) has produced as series of standards and guidance for records management and the full text of these documents can be found on its website: http://www.proni.gov.uk

Actions:

- Develop an outline of record keeping standards

- Detail the standards in each service area

- Include record keeping training in induction programmes for new staff (at corporate and local level including legal requirements)

- Develop a programme of training and updating for all staff with the details being included in personnel files and personal development portfolios

- Set up a plan of regular audits

Outcomes:

- A high level NIMDTA record keeping policy for all records (manual and electronic) will be produced and implemented

- A comprehensive training programme will be available for all staff

- A process for regular audit will be established

6.2 Sharing Records

Strategic Aim

All staff will work towards rationalising record collections through sharing records and the information they contain by merging or ensuring effective cross-reference. It must be recognised that data belongs to NIMDTA and not to individuals or departments.

It is important to recognise that HSC Records are public records as defined in the Public Records Act (Northern Ireland) 1923 and the Chief Executive is ultimately responsible for all records generated in NIMDTA. Each member of staff has a responsibility for records they create but they do not own them

It must be noted that NIMDTA recognises restrictions on the disclosure of information. These are to be respected at all times.

Actions:

- Identify records that could be shared.

- Set up process for prospectively merging or cross-referencing manual and/or electronic records.

- Ensure effective communication to all staff

Outcomes:

- A comprehensive list of all types of records held and by whom will be established.

- A plan for setting up processes for merging or cross-referencing records will be agreed.

6.3 Accessibility and Security

Strategic Aim

Security and tracking of records will be incorporated within the management of all records within the NIMDTA

Records are valuable for the information they contain but the information is only a value if it is available if needed.

It is essential for records to be located quickly and efficiently. Records get misplaced or lost when they are removed from their source, for whatever reason, because their next destination is not clearly recorded. To avoid this there needs to be a comprehensive tracking system for all records.

The success of any system depends on the people using it and therefore all staff, whatever their status, must be made aware of its importance and given adequate training and updating.

When a non HSC agency or individual is contracted to carry out work on behalf of the NIMDTA, their contract must include clauses on confidentiality and the use of personal information, in line with the Data Protection Act 1998. Contracts must also include what action will be taken in the event of confidence being breached.

Records in constant or regular use may need to be kept near the user of the records or transported. They must still be kept securely with a balance maintained between the needs for security and accessibility.

Actions:

- Ensure all staff are aware of Data Protection, Freedom of Information and any other legal requirements.

- Within each department review arrangements for the security and tracking of records

- Develop an organisation file plan and central inventory of all NIMDTA records.

- Through consultation with staff set standards for security and tracking of manual and electronic records

- Identify ways to promote and support successful implementation of the standards through raising awareness, training and updating

Outcomes:

- A comprehensive picture of where records are stored will be available throughout NIMDTA.

- Compliance with the requirements of the Data Protection and Freedom of Information Acts.

6.4 Storage and Retention of Manual Records

Strategic Aim

All manual and electronic records, in NIMDTA will be appropriately stored and retained in accordance with NIMDTA's recommended retention period as agreed by the Members of NIMDTA Board and in line with "Good Management, Good Records"

All "current/active" records should be stored so that they are accessible and comply with security and health and safety requirements.

Comprehensive records should be retained when long-term storage is used and this should include specification of destruction dates. A mechanism for reviewing records for disposal should be developed and implemented

Consideration should be given to records for permanent preservation. These will need to be initially placed in long term storage with a view to them then being moved to PRONI as required. Boxes of such records must be clearly marked accordingly.

The Records Management Strategy incorporates recommended retention periods for its records as per the disposal schedule. This schedule is based on those minimum requirements identified in *Good Management, Good Records.*

Actions:

- All managers will check that storage arrangements for records comply with security and health & safety requirements

- A plan should be developed to ensure regular archiving takes place for manual and electronic records. This plan should include review dates for determining those records to be selected for permanent preservation, destroyed or retained for research or litigation purposes.

- Guidance should be made available for good practice on packing, labelling and identifying records in readiness for long-term storage.

- All boxes placed in long term storage should be clearly marked in accordance with the guidance

- NIMDTA should be working towards a process of archiving some of its records electronically, with new records for these services being inputted directly onto systems

Outcomes:

- The risk to staff in handling records will be reduced

- In the future there will be an automatic prompt for records to be reviewed prior to destruction

- Records will only be kept for as long as required and the need for storage will be managed effectively.

- NIMDTA will move towards more electronic data being held on systems

6.5 Non-Paper Records

Strategic Aim

The principles of good record management will also apply to electronic data.

NIMDTA has moved forward with networking, co-ordinating, controlling and the supporting of new clinical and administrative electronic systems. Some of these have been developed in conjunction with neighbouring organisations.

The management, 'ownership' and co-ordination of the processes in relation to systems must be standardised throughout NIMDTA and must include archiving, storage, security and training related to such data.

All users of electronic systems need to be conversant with the Data Protection Act (1998) and the Freedom of Information Act (2000).

The principles of good record keeping apply equally to records created electronically.

Staff in NIMDTA need to be reminded that records may also take the form of scanned documents, audio or video tapes and these will all need to be subject to 'good practice'.

NIMDTA's Sharepoint Intranet site will be used to host policies and other documents for general viewing.

There is an identifiable need for more resources to be put in to raising awareness, training, updating and auditing all aspects of non paper records

Actions:

- NIMDTA's recommended retention periods [Appendix C] will apply equally to electronic data and audio and video records and such data will be reviewed accordingly.

Outcomes:

- Increased awareness and understanding by users of data systems of the importance of confidentiality, security and the sharing of information.

- Improved standards in electronic record keeping

6.6 <u>Disposing of Records</u>

Strategic Aim

Records will be reviewed under the criteria of NIMDTA's retention periods [as set out in Good Management Good Records] and those no longer required by the services of NIMDTA will be considered for permanent preservation, research, disposal or any other use as agreed by NIMDTA Board

The retention of records will be in accordance with NIMDTA's minimum retention periods [summarised in Appendix C] which take into account the needs of the users of the records and legal requirements.

In theory records should be destroyed as soon as possible after the expiry date of the minimum retention period but with electronic advancements consideration should be given to retaining manual records in another medium.

There must be a consistent and regular approach across NIMDTA to the reviewing and disposing of records. Processes/check lists need to be documented for easy reference by other members of staff.

A record, or brief description, must be kept about any record that has been destroyed if it is deemed to be a document that was relevant to the business of NIMDTA.

Confidentiality must be maintained at all times.

Actions:

- NIMDTA staff will be made aware of the agreed minimum retention periods.

- Information relating to off-site records will be centralised so that records for review/disposal can be identified and action taken in a timely manner.

- All records will be reviewed (manual and electronic) to determine whether they are to be permanently retained, destroyed or retained for the purpose of research or litigation.

- Methods of disposal of records will meet NIMDTA requirements for confidentiality and security.

Outcomes:

All NIMDTA records (manual and electronic) will be appropriately retained or disposed in accordance with NIMDTA retention guidance.

6.7 Documentation

Strategic Aim

Standards will be introduced and applied to the production of NIMDTA documentation (manual and electronic).

A consistent standard and style of documentation should be encouraged across NIMDTA, particularly for Board papers and other documents produced in the public domain.

The use of 'jargon' must be discouraged to enable understanding by a wide range of readers.

Master copies of formal Minutes produced at meetings throughout NIMDTA should be routinely signed once the accuracy of the same has been agreed and duplicate copies to be retained only as considered necessary.

Actions:

- Standards will be set and guidance given for the style of documentation to be used for the writing of policies/standards/minutes/agenda's etc.

- NIMDTA's logo will be readily available.

- Templates for letters/memos/fax etc. will be available on the network and staff who do not have ready access to the Intranet should be provided with templates.

Outcomes:

- The staff of NIMDTA will produce documentation (manual and electronic) in a co-ordinated and professional format.

- The use of jargon will be minimised

- The title, author and date of documents will be clearly identified for future reference enabling regular review and update.

The outcome of all the actions collectively identified in 6.0 – 6.7 above will provide the framework for developing and implementing a comprehensive records management policy in NIMDTA.

7 Risk

One of the definitions of risk which underpins Controls Assurance is

'The chance of something happening that will have an impact upon objectives. It is measured in terms of consequences and likelihood'. (Source: Standards Australia (1999) Risk Management. AS /NZS 4360:1999. Standards Association of Australia. Strathfield. P3)

Effective records management within NIMDTA will ensure that risks associated with managing information will be minimised. Information in any medium will be easily available and accessible to support all areas of NIMDTA's work.

8. Conclusion

NIMDTA Board have adopted this strategy with its policy statement and have agreed to its implementation on 11 March 2014.

Through this commitment it will ensure that responsibility is accepted by NIMDTA and appropriate arrangements are in place for establishing good records management, for all records within NIMDTA.

Appendix A – <u>Summary of Strategic Aims</u>

Record Keeping

Development and Training in Record Keeping (electronic and manual) will be given a priority in Records Management.

Sharing Records

All staff will work towards rationalising record collections through sharing records and the information they contain, (subject to the requirements of the Data Protection Act 1998 by merging or ensuring effective cross-reference. It must be recognised that data belongs to NIMDTA and not to individuals or departments.

Accessibility and Security

The security and tracking of records will be incorporated within the management of all records within NIMDTA.

Storage and Retention of Manual Records

All manual and electronic records, in NIMDTA will be appropriately stored and retained in accordance with NIMDTA's recommended retention period as agreed by the Members of NIMDTA Board and in line with Good Management. Good Records.

Non Paper Records

The principles of good record management will also apply to electronic data.

Disposing of Records

Records will be reviewed under the criteria of NIMDTA's retention periods, as defined within Good Management Good Records [summarised in Appendix C] and those no longer required by the services of NIMDTA will be considered for permanent preservation, research, disposal or any other use as agreed by NIMDTA Board

Documentation

Standards will be introduced and applied to the production of NIMDTA documentation (manual and electronic).

Appendix B – Records Management Policy

Please add the 'Records Management Policy' to this document as Appendix B when referring or updating the Records Management Strategy Policy

Appendix C – Records Management Disposal Schedule

Please add the 'Records Management Disposal Schedule' to this document as Appendix C when referring or updating the Records Management Strategy Policy