focus
independent adult social work

Records Management & Data Quality Policy

Heritage House, Fisherman's Wharf, Grimsby, DN31 1SY

1 Contents

1. Introduction

Records Management is the process by which an organisation manages all the aspects of records whether internally or externally generated and in any format or media type, from their creation, all the way through their lifecycle to their eventual disposal. The Records Management: NHS Code of Practice, published by the Department of Health, provides a guide to the required standards of practice in the management of records for those who work within or under contract to NHS organisations in England. It is based on current legal requirements and professional best practice. Responsibilities with regards to patient and client records are laid out in the Social Care and NHS care Record Guarantees.

The records held by focus C.I.C are important in that they:

- Are focus C.I.C corporate memory;
- Support the daily operations of focus C.I.C and the delivery of services ;
- Support decision making by focus C.I.C;
- Protect the interests of focus C.I.C and rights of service users and carers, employees and the public.

This document sets out a framework for records management that is supported by specific procedures to ensure that records are managed and controlled effectively and are commensurate with legal, operational and information needs.

2   Scope and Definitions

Scope

This policy relates to all operational records held in any format by focus C.I.C. This includes:
- All administrative records (e.g. personnel, estates, financial and accounting records, notes associated with complaints);
- All individual service user / carer records.

Definitions

Records Management

Records management involves the use of an administrative system to direct and control the creation, version control, distribution, filing, retention, storage and disposal of records in a way that is administratively legal and sound, whilst at the same time meeting the operational needs of focus C.I.C and preserving an appropriate historical record.

Records Life Cycle

The term Records Life Cycle describes the life of a record from its creation/receipt through the period of its 'active' use, then into a period of 'inactive' retention (such as closed files which may still be referred to occasionally) and finally either confidential disposal or archive.

Records

In this policy, Records are defined as 'recorded information, in any form, created or received and maintained by focus C.I.C in the transaction of its business or conduct of affairs and kept as evidence of such activity'.

Information

Information is a corporate asset of focus C.I.C. focus C.I.C's records are important sources of administrative, evidential and historical information. They are vital to focus C.I.C to support its current and future operations.

3   Aims of focus C.I.C Records Management System

The aims of our Records Management System are to ensure that:

- Records are available when needed - from which focus C.I.C is able to form a reconstruction of activities or events that have taken place;

- Records can be accessed - records and the information within them can be located and displayed in a way consistent with its initial use, and that the current version is identified where multiple versions exist;

- Records can be interpreted - the context of the record can be interpreted: who created or added to the record and when, during which business process, and how the record is related to other records;

- Records can be trusted – the record reliably represents the information that was actually used in, or created by, the business process, and its integrity and authenticity can be demonstrated;

- Records can be maintained through time – the qualities of availability, accessibility, interpretation and trustworthiness can be maintained for as long as the record is needed, perhaps permanently, despite changes of format;

  - Records are secure - from unauthorised or inadvertent alteration or erasure, that access and disclosure are properly controlled and audit trails will track all use and changes. To ensure that records are held in a robust format which remains readable for as long as records are required;
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- Records are retained and disposed of appropriately - using consistent and documented retention and disposal procedures, which include provision for appraisal and the permanent preservation of records with archival value; and Staff are trained - so that all staff are made aware of their responsibilities for record-keeping and record management.
- Data Protection Impact Assessments (DPIA) – the Data Protection Officer (DPO) will ensure that all new projects, systems and processes involving high risks to individuals from the collection and recording of data will have a DPIA undertaken to mitigate the level of personal and confidential information.

4   Roles and Responsibilities

Chief Executive/ Caldicott Guardian

The Chief Executive has overall responsibility for records management within focus C.I.C. He is responsible for ensuring appropriate mechanisms are in place to support service delivery and continuity. Records management is key to this as it will ensure appropriate, accurate information is available as required.

As Caldicott Guardian the Chief Executive has a particular responsibility for reflecting service user / carer interests regarding the use of personal identifiable information. They are responsible for ensuring such identifiable information is shared in an appropriate and secure manner.

Head of Business and Governance

The Head of Business and Governance is responsible for ensuring that this policy is implemented and that the records management system and processes are developed, co-ordinated and monitored.

Data Protection Officer (DPO) / Head of Information & Security

The DPO is responsible for ensuring that this policy is implemented and that the records management system and processes are compliant with the Confidential, Integrity and Availability (CIA) Triad and associated data quality is monitored and addressed accordingly. Whilst providing advice and guidance to the leadership team and workforce.

Supervisors

Supervisors are responsible for local records management. They have overall responsibility for the management of records generated by their activities, i.e. for ensuring that records controlled within their area / team are managed in a way which meets the aims of focus CIC records management policy.

All Staff

All staff who create receive and use records have records management responsibilities. In particular all staff must ensure that they keep appropriate records of their work in focus CIC manage those records in keeping with this policy.

5   Legal and Professional Obligations

focus C.I.C will take actions as necessary to comply with the legal and professional obligations set out in the Records Management: NHS Code of Practice, in particular:

- The Public Records Act 1958;
- General Data Protection Regulation (GDPR)

- The Data Protection Act 2018;
- The Common Law Duty of Confidentiality; and
- The NHS Confidentiality Code of Practice.

As well as and any new legislation affecting records management as it arises.

6   Retention and Disposal Schedules

It is a fundamental requirement that all of the focus C.I.Cs records are retained for a minimum period of time for legal, operational, research and safety reasons. The length of time for retaining records will depend on the type of record and its importance to focus C.I.Cs business functions. focus C.I.C has adopted the retention periods set out in the Records Management: NHS Code of Practice.

7   Information Quality Assurance

All staff will be made aware of their responsibilities for record creation, use and maintenance through their induction programme, training programmes and ongoing supervision. This will include having an understanding of:

- What they are recording and how it should be recorded;

- Why they are recording it;

- How to validate information with the service user or carers or against other records – to ensure that staff are recording the correct data;

- How to identify and correct errors – so that staff know how to correct errors and how to report errors if they find them;

- The use of information – so staff understand what the records are used for (and therefore why timeliness, accuracy and completeness of recording is so important);
- How to update information and add in information from other review and monitoring.

Regular audits supported further by spot checks will be undertaken to assess the accuracy of recorded information and to rectify errors. The systems and processes associated with key record sets will be reviewed regularly.

8   Review and monitoring

This policy will be reviewed under a 3 year rolling programme of reviews for all focus C.I.Cs policies and procedures. If there are changes to legislation and/or difficulties in practical application the timescale for review will be brought forward.

9   References

Records Management: NHS Code of Practice Department of Health
Destruction and retention policy
Deceased Procedure
NHS Care Records Guarantee
Social Care Records Guarantee
Warning Marker Indicator Procedure