

HSC	Controls Assurance Standard	Records Management
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RECORDS MANAGEMENT

STANDARD

A systematic and planned approach to the management of all records is in place within the organisation that ensures, from the moment a record is created until its ultimate disposal, that the organisation can control, both the quality and quantity of information it generates; can maintain that information in a manner that effectively services its needs and those of its stakeholders; and it can dispose of the information appropriately when it is no longer required.

OVERVIEW

Service User – Anyone who uses health or social care services

This standard covers all types of HSC records and storage media, (including records of HSC patients treated on behalf of the HSC in the private healthcare sector) both corporate and administrative, including:

- Service User records (electronic or paper based: including those containing all specialities, but excluding GP medical records).
- Accident and Emergency, Birth, and all other Registers.
- Theatre Registers and Minor Operations (and all other related) Registers
- Administrative records (including eg 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 (ie fiche/film).
- Audio and videotapes, cassettes, CD-Rom etc.
- Computer databases, output, disks and pen drives etc and all other types of electronic records.
- Material intended for short term or transitory use, including notes and ‘spare’ copies of documents.

The [Data Protection Act 1998](#) supported by other access to information regimes such as the [Freedom of Information Act 2000](#), the [Environmental Information Regulations 2004](#) and the [Access to Health Records \(Northern Ireland\) Order 1993](#) impacts significantly on the the record keeping arrangements in public authorities.

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HSC bodies must ensure that records management policies and procedures are fully compliant with legislation and government policy on the management of information. Further information can be accessed via the Freedom of Information website <http://www.foi.nhs.uk/home.html> and <http://www.proni.gov.uk>.

An effective records management service, including the transfer of patient/client records to other HSC organisations, ensures that information is properly managed and is available whenever and wherever there is a justified need for that information, and in whatever media it is required. Information may be needed:

- To support service user care and continuity of care;
- To support day-to-day corporate activities which underpin delivery of care;
- To support evidence based practice;
- To support sound administrative and managerial decision-making, as part of the knowledge base for HSC services;
- To meet legal requirements, such as those relating to the storage, handling and disposal of records including requests from service users under subject access provisions of the [Data Protection Act 1998](#) or the [Freedom of Information Act 2000](#);
- To assist clinical and other types of audits;
- To support improvements in clinical effectiveness through research and also support archival functions by taking account of the historical importance of material and the future needs of research;
- To ensure that the management of such data is appropriate and that any risks to the integrity of the data are minimised; or
- To support service user choice and control over treatment and services designed around service users.

The organisation should identify the range and type of information:

- Generated within the organisation (for example, individual service user records, other information relating to service user care, data required to support the business activities of the organisation etc)
- Passed by the organisation to other stakeholders
- Received by the organisation from other individuals/organisations.

It is also important to manage the different risks associated with the various systems of data capture, recording, retrieval and disposal and for these to be controlled, ie paper based systems may require different controls than those which are computer based, although the underlying principles of confidentiality etc will remain common. It is also essential for any assessment to consider the potential variation in records management across the organisation (in that different

organisations may well have historically different records management systems, especially if there is no previous history of working together). Ensuring that all organisations comply with relevant policies and legislation and maintain the highest standards of data management is central to the achievement of the organisation's objectives.

HSC staff are responsible for the safe-keeping of all records which they handle. This includes being conversant with systems provided for the tracking of records so that their locations are known at any time.

Creating and maintaining electronic records for both service user services and administration will offer benefits, but also significant challenges. Records management strategies will need to take account of the opportunities presented by new standards and a developing Health Records Infrastructure, and of the effort required to make a smooth transition from paper to electronic record keeping.

Records management strategies will need to include measures for ensuring the confidentiality, integrity, availability and disposal of electronic records. Full account should be taken of electronic patient records in business continuity planning.

Information is the lifeblood of the HSC organisation and is essential to the delivery of high quality evidence-based health care on a day-to-day basis. Records are a valuable resource because of the information they contain. That information is only usable if it is correctly recorded in the first place, is regularly updated, properly stored and maintained, and is easily accessible when needed.

It should be noted that any lists of examples throughout this standard are not exhaustive.

KEY REFERENCES

The majority of documents appearing on this page are downloadable in PDF (Portable Document format). Viewing these requires **Adobe Acrobat Reader** on your computer. If you do not have this free software, you are advised to contact your administrator to arrange for a copy to be installed on your computer. Alternatively Adobe Acrobat can be downloaded directly from Adobe's website <http://www.adobe.com/acrobat>.

The links below were all accurate at the time of publication.

British Standards Institution (1999) *a code of practice for legal admissibility and evidential weight of information stored electronically*. BIP 008-1:2008
<http://www.bsi.org.uk/index.xalter>.

British Standards Institution (2000) *Information security management BS 7799-ISO/IEC17799: 2000* London BSI <http://www.bsi.org.uk/index.xalter>.

British Standards Institution (2000) *Recommendations for the storage and exhibition of archival documents BS5454* <http://www.bsi.org.uk/index.xalter>.

British Standards Institution (2002) *Effective Records Management: Part 1, A management guide to the values of BS ISO 15489-1* BS PD 0025-1: 2002 London, BSI <http://www.bsi.org.uk/index.xalter>.

British Standards Institution (2002) *Effective Records Management: Part 2, Practical implementation of BS ISO 15489-1* BS PD 0025-2: 2002 London, BSI <http://www.bsi.org.uk/index.xalter>.

British Standards Institution (2002) *Effective Records Management: Part 3, Practical implementation of BS ISO 15489-1* BS PD 0025-3: 2003 London, BSI <http://www.bsi.org.uk/index.xalter>.

British Standards Institution *Storage, transportation and maintenance of media for use in data processing and information storage*. BS 4783: London BSI
<http://www.bsi.org.uk/index.xalter>.

Disposal of Documents Order (NI)1925 SR 1925/167
http://www.proni.gov.uk/1925_disposal_of_documents_order.pdf

Great Britain (1987) *The Consumer Protection Act 1987*
[Office of Public Sector Information](#)

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Great Britain (1998) *the Data Protection Act 1998* The Stationery Office, London
http://www.opsi.gov.uk/Acts/Acts1998/ukpga_19980029_en_1

Great Britain (2000) *The Freedom of Information Act 2000* The Stationery Office, London.
www.opsi.gov.uk/acts/acts2000

Great Britain (2001) *The Health and Social Care Act 2001* The Stationery Office, London.
http://www.opsi.gov.uk/acts/acts2001/ukpga_20010015_en_1

Great Britain. Lord Chancellors Code of Practice on the Management of Records under Section 46 of the Freedom of Information Act 2000. (2002) London: The Lord Chancellor's Department.
<http://www.foi.gov.uk/reference/impreg/codemanrec.pdf>

Guidelines for Managing Records in Health and Personal Social Services Organisations in Northern Ireland – Good Management Good Records.
<http://www.dhsspsni.gov.uk/dhs-goodmanagement.pdf>

HCASU The Health Care Standards Unit <http://www.hcsu.org.uk>.

Health Activists Group (2002) *Hospital Patient Case Records: a guide to their retention and disposal*
<http://www.pro.gov.uk/archives/standards/hospitalrecords.htm>.

HSC 1998/153: Using electronic patient records in hospitals legal requirements and good practice
http://www.dh.gov.uk/en/Publicationsandstatistics/Lettersandcirculars/Healthservicecirculars/DH_4004847

IHRIM Institute of Health Record and Information Management
<http://www.ihrim.co.uk>.

NHS Code of Practice 2005
http://www.dh.gov.uk/en/Consultations/Closedconsultations/DH_4119931

PRONI – Northern Ireland Records Management Standards (NIRMS). [Records and information management | Public Record Office of Northern Ireland](#)

Public Records Act (Northern Ireland) 1923 (13&14 Geo5, c. 20)
[Public Records Act \(Northern Ireland\) 1923 \(Chapter 20\)](#)

The Access to Health Records (Northern Ireland) Order 1993
http://www.legislation.hmso.gov.uk/si/si1993/Uksi_19931250_en_2.htm

INDEX OF RECORDS MANAGEMENT CRITERIA

Criterion 1

Responsibility for records management lies at Board level and clear lines of accountability for records management exist at Board level and throughout the organisation.

Criterion 2

There is an organisation-wide records management policy and strategy in place, supported by a comprehensive and cost effective records management programme. Risk management is also taken into consideration in the records management programme.

Criterion 3

A senior manager is responsible for co-ordinating, publicising, implementing and monitoring the records management strategy and reporting to the Board on a regular basis.

Criterion 4

All managers are responsible for ensuring that staff are aware of their personal responsibilities for the creation, use, storage, security, confidentiality, transfer and disposal of the organisation's records.

Criterion 5

All employees receive appropriate training in records management procedures.

Criterion 6

An effective monitoring and review process is in place within the organisation.

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CRITERION 1

Responsibility for records management lies at Board level and clear lines of accountability for records management exist at Board level and throughout the organisation.

INFORMATION

Source

- NHS Executive (1999) *Clinical Governance in the New NHS*. HSC 1999/065 1999. [HSC 1999/065: Clinical governance in the new NHS : Department of Health - Publications](#)
- Guidelines for Managing Records in Health and Personal Social Services Organisations in Northern Ireland – Good Management Good Records <http://www.dhsspsni.gov.uk/dhs-goodmanagement.pdf>
- NHS Executive (1999) *Governance in the New NHS. Controls Assurance Statements 1999/2000 Risk Management and Organisational Controls*. HSC 1999/123. 1999. http://www.dh.gov.uk/en/PublicationsAndStatistics/LettersAndCirculars/HealthServiceCirculars/DH_4003756
- Standards Australia (2004) *Risk Management AS/NZS 4360:2004*. Standards Association of Australia. Strathfield NSW. http://www.wales.nhs.uk/ihc/documents/A.4.1.4_Australia_and_New_Zealand_Methodology_AS_NZ%204360_1999.pdf
- PRONI – Northern Ireland Records Management Standards (NIRMS). [Records and information management | Public Record Office of Northern Ireland](#)
- NHS Code of Practice 2005 http://www.dh.gov.uk/en/Consultations/Closedconsultations/DH_4119931

Guidance

All HSC records are public records under the terms of the [Public Records Act \(Northern Ireland\) 1923](#) and the Disposal of Documents Order No 167, 1925 http://www.proni.gov.uk/1925_disposal_of_documents_order.pdf. Chief Executives and senior managers of all HSC bodies are personally accountable for records management within their organisation and have a duty to make arrangements for the safekeeping of those records under the overall supervision of the Keeper of Public Records. Other legal obligations exist in respect of particular classes of records, especially those containing personal information.

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Everyone working for or with the HSC organisations who records, handles, stores, or otherwise comes across information, has a personal common law duty of confidence. The [Data Protection Act 1998](#) places statutory restrictions on the use of personal information, including health information.

Clear lines of accountability should be established throughout the organisation for the management of records.

Evidence demonstrating Compliance

- Accountability arrangements chart – documentation showing responsibility for records management within the organisation.
- Board minutes – copy minutes where records management has been discussed and amendments/changes agreed.
- Job descriptions – outlining job role for staff involved in records management procedures.
- Risk management policy – includes risks relating to records management
- Corporate and Business Plans – records management is included in the corporate and business objectives.
- Audit reports – relating to audits of record management procedures.

Links with other standards

All standards (generic criterion)

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CRITERION 2

There is an organisation-wide records management policy and strategy in place, supported by a comprehensive and cost-effective records management programme. Risk management is also taken into consideration in the records management programme.

INFORMATION

Source

- Guidelines for Managing Records in Health and Personal Social Services Organisations in Northern Ireland – Good Management, Good Records. <http://www.dhsspsni.gov.uk/dhs-goodmanagement.pdf>
- PRONI – Northern Ireland Records Management Standards (NIRMS) [Records and information management | Public Record Office of Northern Ireland](#)
- Standards (1999) Storage of Semi-current records, Standards for the Management of Government Records RMS 31 1999 http://www.nationalarchives.gov.uk/documents/stan_semicurrent.pdf
- Department of Health (2002) Delivering 21st Century IT Support for the NHS: National Strategic Programme [Delivering 21st century IT support for the NHS: national strategic programme : Department of Health - Publications](#)
- NHS Code of Practice 2005 http://www.dh.gov.uk/en/Consultations/Closedconsultations/DH_4119931

Guidance

All HSC organisations should have in place an organisational records management strategy, identifying the resources needed to ensure that records of all types (administrative as well as medical) are properly controlled, tracked, readily accessible and available for use, and eventually archived or otherwise disposed of. It is important that the resources devoted to records management are adequate for the work to be completed and that senior managers ensure staff are appropriately trained and policies and procedures reviewed and updated as necessary.

A record is anything that contains information in any medium, e.g. paper, microfiche, audio or video tapes, x-ray images, computer database, notes, e-mail etc which has been created or gathered as a result of any HSC activity, whether clinical or non-clinical, by employees – including consultants, agency or casual

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staff. Records management strategies must be in place, together with arrangements to monitor progress and compliance on a regular basis.

Where possible the strategy should encourage the rationalisation of records collections through the development of systems which allow records and the information they contain to be shared in a controlled way (but subject to statutory security and agreed confidentiality guidelines e.g. ([Data Protection Act 1998](#)) and which facilitate cross-referencing or merging (e.g. of all records for the same service user). The strategy should be supported by a comprehensive records management programme which ensures the safe-keeping of records in accordance with the guidelines for managing records in HPSS organisations – Good Management, Good Records (GMGR). <http://www.dhsspsni.gov.uk/dhs-goodmanagement.pdf>

Evidence demonstrating compliance

- A comprehensive policy statement that demonstrates that all records management issues have been identified.
- Board minutes which identify any endorsements or amendments of the policy statement.
- An up to date records management policy.
- Communication of the records management policy to all staff
- Supporting standards, procedures and guidelines

Links with other standards

Information Management and Technology
Risk Management

CRITERION 3

A senior manager is responsible for co-ordinating, publicising, implementing and monitoring the records management strategy and reporting on a regular basis to the Board.

INFORMATION

Source

Guidelines for Managing Records in Health and Personal Social Services Organisations in Northern Ireland – Good Management Good Records.
<http://www.dhsspsni.gov.uk/dhs-goodmanagement.pdf>

Guidance

Senior management are responsible for records management and for ensuring that all staff are involved in the programme for implementing the records management strategy. The programme should encompass:

- Profile raising and publicity
- Appropriate resources including training
- Review of procedures and implementation plan for specific actions arising
- Monitoring individual and organisational compliance

Local records managers should have the appropriate cross-organisational authority to achieve key objectives; should establish their relationship with internal audit and management teams; and should have the necessary competences.

Evidence demonstrating compliance

- A senior manager has been given written responsibility for co-ordinating, publicising and monitoring implementation of the records management strategy.
- Job descriptions for all staff
- Appraisals of information surveys, records, audits, etc – copy reports where the record management procedures have been examined.
- The authority of local records managers is documented – job description, objectives.
- The relationship between local records managers and management teams is documented – job description, objectives.

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- Board reports recording issues/recommendations related to records management.
- Board minutes – discussion of records management issues/recommendations.

Links with other standards

Information Management and Technology

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CRITERION 4

All managers are responsible for ensuring that staff are aware of their personal responsibilities for the creation, use, storage, security , confidentiality, transfer and disposal of the organisation’s records.

INFORMATION

Source

- Department of Health 1997 Information Security Management:NHS Code of Practice. Department. Of Health, London. [Information Security Management: NHS Code of Practice : Department of Health - Publications](#)
- Great Britain (1998) *the Data Protection Act 1998* The Stationery Office, London http://www.opsi.gov.uk/Acts/Acts1998/ukpga_19980029_en_1
- Guidelines for Managing Records in Health and Personal Social Services Organisations in Northern Ireland – Good Management Good Records. <http://www.dhsspsni.gov.uk/dhs-goodmanagement.pdf>
- Department of Health (2002) *Delivering 21st Century IT Support for the NHS: National Strategic Programme*. Department of Health, London. [Delivering 21st century IT support for the NHS: national strategic programme : Department of Health - Publications](#)
- Information for Health – an information strategy for the Modern NHS 1998-2005 (HSC 1998/168) sets out a comprehensive information strategy. The strategy has since been updated by *Building the Information Core- implementing the NHS Plan* (January 2001) [Building the information core implementing the NHS Plan : Department of Health - Publications](#)
- Crest Guidance – protocol for the inter hospital transfer of patients and their records <http://www.gain-ni.org/Guidelines/protocol.pdf>

Guidance

In practice, individuals within HSC organisations are responsible for any records they create or use. This responsibility is established at, and defined by, law. Furthermore, as an employee of the HPSS, any records that he/she creates are public records in accordance with the [Public Records Act \(Northern Ireland\) 1923](#) and the Disposal of Documents Order No 167, 1925.

http://www.proni.gov.uk/1925_disposal_of_documents_order.pdf

Everyone working for or with the HSC who records, handles, stores or otherwise encounters information has a personal common law duty of confidence. The [Data Protection Act 1998](#) now places statutory restrictions on the use of personal information, including health information.

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Even the most stringent security and confidentiality measures can be undermined by the improper actions of staff who handle personal data and information.

Examples include:

- Confidential service user, staff or operational information in visible format (ie on a white board at the nursing station).
- Service user notes or charts kept unsecured at the foot or side of a service user's bed.
- Confidential service user, staff or operational data discussed with, or in the presence of, others who should not have access to such information.
- Service user electronic records visible on a computer screen to those who should not have access to such information.

As a matter of policy and procedure, all staff should understand their responsibilities when using or communicating personal data and information. Increasingly, information will be created, stored and disseminated electronically as work progresses implementation of an integrated Care Record Service (ICRS). The underlying principles for effective records management apply equally to electronically held records. It is important, therefore, to ensure adequate consideration is given to records management in all relevant Information Management and Technology strategies.

Evidence demonstrating compliance

- Induction training includes consideration of records management issues.
- The responsibilities of employees for managing records, which they create or use, are documented – job descriptions, objectives

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Links with other standards

Human Resources

Information Management and Technology

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CRITERION 5

All employees receive appropriate training in records management procedures.

Source

- Guidelines for Managing Records in Health and Personal Social Services Organisations in Northern Ireland – Good Management Good Records. <http://www.dhsspsni.gov.uk/dhs-goodmanagement.pdf>
- The National Archives www.tna.gov.uk – provides introductory and bespoke courses on all aspects of records management
- RM3 –DIPLOMA/CERTIFICATE IN PROFESSIONAL STUDIES: RECORDS AND INFORMATION MANAGEMENT. [The D/CPS: RIM by distance learning focuses on central government recordkeeping, but is suitable for most people working within the wider public sector in a records management environment.](#)

Guidance

Knowledge of record management practice can be delivered to all staff through information provision, instruction and relevant training. Staff induction training should include reference to records management procedures and appropriate training courses should be available to staff within the organisation directly involved in the records management process. A training needs analysis can be used to identify gaps in the information and learning process.

Evidence demonstrating competence

Training records – records of attendance/non-attendance at training courses.
 Training needs analysis – information identifying knowledge gaps in records management procedures.

Links with other standards

Human Resources

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CRITERION 6

An effective monitoring and review process is in place within the organisation.

INFORMATION

Source

- Guidelines for Managing Records in Health and Personal Social Services Organisations in Northern Ireland – Good Management, Good Records. <http://www.dhsspsni.gov.uk/dhs-goodmanagement.pdf>
- NHS Executive. *Governance in the New NHS: Controls Assurance Statements 2000/2001 and Establishment of the Controls Assurance Support Unit.* HSC 2001/005. [HSC 2001/005: Governance in the new NHS: controls assurance statements 2000/2001 and establishment of the controls assurance unit : Department of Health - Publications](#)
- Dept of Finance and Personnel: Data Protection review 2007; Data Protection Review Reassessment 2008 http://www.dfpni.gov.uk/report_on_the_northern_ireland_data_protection_review.pdf
- Internal Audit Reviews

Guidance

A risk management policy should be in place to assist the review, on a regular basis, of all aspects of the records management service. The development of performance indicators would enable the Board to ensure that effective internal controls are in place and that records management objectives for the organisation are being met. Quality assurance of systems and procedures by both internal and external sources should also be carried out on a regular basis.

Organisations should also consider benchmarking against like organisations measuring similar processes.

Evidence demonstrating compliance

Performance indicators – to measure the organisation’s record management performance.

Risk Management Assessment – to highlight steps taken to minimise risks in the records management process.

Internal Audit reports – internal review of records management procedures.

Minutes of meetings – discussion of record management procedures/approval of changes to existing procedures.

Links with other standards

All standards