

POLICY DOCUMENT

Records Management Policy

(This document is also known as **APPENDIX B** when read in conjunction with '**Records Management Strategy**')

Policy Review Schedule

Date first Approved by the Board: 26 January 2006

Last Approved by the Board: January 2019

Date of Next Review: January 2021

Amendment Overview

| Version | Date | Pages | Comments | Actioned |
|--------------------|------------|----------------|--|------------------------------|
| 2006 - 1.0 | 26/01/2006 | | Approved by NIMDTA Board | |
| 2009 - 2.0 (draft) | 10/06/2009 | | Revisions made in light of Audit recommendations. Minor amendments, and updated to reflect NIMDTA policy 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) | 01/01/2012 | | Policy reviewed with minor amendments. Updated to new Policy template. | Mark Oliver |
| 2012 – 3.0 | 23/02/2012 | | Presented to NIMDTA Board. Approved | |
| 2012 – 3.1 | 01/10/2013 | 16 | Updated to reflect Role of NIMDTA and new mission statement | Linda Craig |
| 2014 – 4.0 | 17/02/2014 | 4, 5, 9, 13-15 | Role of NIMDTA updated. Reviewed with amendments. | Mark Oliver |
| 2014 – | 25/02/2014 | 16 | Presented to G&R | |

| | | | | |
|------------|------------|--------|--|-------------|
| 4.0 | | | Committee for approval. Approved subject to a minor change | |
| 2014 – 4.1 | 27/02/2014 | 16 | Presented to NIMDTA Board for approval. | |
| 2014 – 4.1 | 11/03/2014 | 16 | Presented to Extraordinary meeting of NIMDTA Board for approval. Approved. | |
| 2015 – 5.0 | 29/04/2015 | 13, 15 | Addition of guidance in relation to scanning of paper records. Minor amendments to Roles and Responsibilities. | Mark Oliver |
| 2015 – 5.1 | 12/05/2015 | | Presented to G & R Committee for approval. Approved. | |
| 2015 – 5.1 | 24/09/2015 | | Presented to NIMDTA Board for approval. Approved. | |
| 2019 – 6.0 | | | Review of Policy. Update to roles and responsibilities and other minor amendments. | Mark Oliver |
| 2019 – 6.0 | 24/01/2019 | | Approved by Agency Board, subject to further discussion at next G&R Committee | |
| 2019 – 6.0 | 13/02/2019 | | Approved at Governance & Risk Committee subject to minor amendments | |
| 2019 – 6.1 | 13/02/2019 | | Amendment to state IG training is mandatory for all NIMDTA staff | Mark Oliver |

Contents

| | |
|---|----|
| Policy Review Schedule..... | 2 |
| Role of the Northern Ireland Medical and Dental Training Agency | 5 |
| Policy Influence..... | 7 |
| Policy Impact | 7 |
| 1. Introduction | 8 |
| 2. Scope | 8 |
| 3. Objectives..... | 9 |
| 4. What is a Record? | 10 |
| 5. Why do you need to keep Records? | 10 |
| 6. What is Records Management? | 11 |
| 7. Records Management System..... | 12 |
| 8. Record Creation and Maintenance..... | 13 |
| 9. Record Disposal | 14 |
| 10. Roles and Responsibilities | 14 |
| 11. Review and Monitoring | 16 |
| 12. Training and Awareness | 17 |

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 (DoH) 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:

- Public Records Act (Northern Ireland) 1923
- Disposal of Documents Order, No 167,1925
- The Limitation (Northern Ireland) Order 1989
- Data Protection Act 2018
- Freedom of Information Act 2000
- Good Management Good Records – Department of Health NI advice and guidance on records management
- PRONI – Northern Ireland Records Management Standards (NIRMS)
- Records Management NHS Code of Practice

Policy Impact

This policy may have an impact on the following:

- Data Protection Policy
- Freedom of Information Policy
- Freedom of Information Publication Scheme
- Records Management Disposal Schedule
- Records Management Strategy
- Security and Premises Management Policy
- IT Policy

1. Introduction

Information is a corporate asset and NIMDTA's records are important sources of administrative, fiscal, legal, evidential and historical information. They are vital to the organisation in its current and future operations, for the purposes of accountability, and for an awareness and understanding of its history. They are the corporate memory of the organisation.

The Northern Ireland Medical and Dental Training Agency 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 the 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.

In consultation with organisations, which may be concerned with the management of its records, NIMDTA will create, use, manage and destroy or preserve its records in accordance with all statutory requirements. Such organisations include the Public Record Office of Northern Ireland (PRONI) which is the official archive for Northern Ireland and Iron Mountain, the providers of off-site storage and record destruction contracted by NIMDTA.

This policy provides a framework for managing the records of NIMDTA and should be read in conjunction with the Records Management Strategy and [Good Management Good Records](#).

2. Scope

This policy provides for:

- the requirements that must be met for the records of the Northern Ireland Medical and Dental Training Agency
- The requirements for systems and processes that deal with records
- The quality and reliability that must be maintained to provide a valuable information and knowledge resource for the organisation
- The position of records management within the strategic and policy framework of the organisation
- The roles and responsibilities of NIMDTA staff
- The arrangements for reviewing the policy and checking the quality of implementation

3. Objectives

The aim of this policy is to define a framework for managing NIMDTA's records to ensure that NIMDTA

- Creates and captures accurate, authentic and reliable records
- Maintains records to meet NIMDTA's business needs
- Disposes of records that are no longer required in an appropriate manner
- Protects vital records
- Adheres to procedures under Section 46 of the Freedom of Information Act 2000 and the associated Code of Practice on the Management of Records
- Manages records in accordance with procedures under the Data Protection Act 2018

4. What is a Record?

A record is information that has been received, created or maintained by an individual or an Organisation as evidence of a business activity and can be in any format – paper, electronic, digital and/or voice.

In the context of [Good Management Good Records](#) a record is anything which contains information (in any media) which has been created or gathered as a result of *any* aspect of the work of employees or those providing a service– including consultants, General Practitioners, Dentists, or casual staff and all contracted services.

NIMDTA records are public records as defined in the PRA 1923.

When handling any type of record, it is important to make the distinction between a record and a document. A document becomes a record when it has been finalised and become part of NIMDTA's corporate information. At this point, the record should not be amended and should only be held in the appropriate physical file and/or the appropriate folder on the shared network drive – not on the local drive of a PC or laptop.

5. Why do you need to keep Records?

Records enable Organisations to:

- conduct business in an orderly, efficient and accountable manner;
- deliver services in a consistent and equitable manner;
- support and document policy formation and managerial decision-making;
- provide consistency, continuity and productivity in management and administration;

- facilitate the effective performance of activities throughout NIMDTA;
- provide continuity in the provision of services;
- provide continuity in the event of a disaster;
- meet legislative and regulatory requirements including archival, audit and oversight activities;
- provide protection and support in litigation including the management of risks associated with the existence of or lack of evidence of NIMDTA's activity;
- protect the interests of NIMDTA and the rights of employees, trainees, trainers, clients, and present and future stakeholders;
- support and document current and future research, and document activities, developments and achievements, as well as historical research;
- establish and provide evidence of business, personal and cultural identity; and
- maintain the corporate, personal or collective memory

6. What is Records Management?

Records management is:

- the systematic and consistent control of all records, regardless of the media on which they are held, throughout their lifecycle. It includes setting up the infrastructure or system into which the records are created, received or added as well as the process of record creation itself.
- organising the records so that related records are grouped together, usually according to a file plan or classification scheme. (Managing groups of related records is more efficient than managing many individual records.)

- the retention and disposal actions such as destruction or transfer to PRONI at the appropriate time and procedures for documenting those actions.

Organisations must know what records they have in order to manage them. Control of the records depends on a range of carefully developed procedures applied to them before their creation through to their disposal.

There are five vital elements of records management:

- meeting business and client needs;
- public records legislation;
- managing records as a valuable and expensive asset;
- accountability for practice and service provision; and
- accountability and quality of information and services.

7. Records Management System

Systematic records management is fundamental to organisational efficiency. It ensures that the right information is:

- captured, stored, retrieved and destroyed and preserved according to need;
- fully exploited to meet current and future needs and to support change;
- accessible to those who need to make use of it; and
- that the appropriate technical, organisational and human resource elements exist to make this possible.

The records management system aims to ensure that:

- the record is present – NIMDTA has the information that is needed to form a reconstruction of activities or transactions that have taken place
- the record can be accessed – it is possible to locate and access the information and display it in a way consistent with initial use
- the record can be interpreted – it is possible to establish the context of the record: who created the document, during which business process and how the record relates to other records
- the record 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
- the record can be maintained through time – the qualities of accessibility, interpretation and trustworthiness can be maintained for as long as the record is needed, perhaps permanently, despite changes of formats

All staff who create, use, manage or dispose of records have a duty to protect them and to ensure that any information that they add to the record is accurate, complete and necessary.

8. Record Creation and Maintenance

The record keeping system must be maintained so that the records are properly stored and protected, and can easily be located and retrieved. This system will include:

- Creation – common processes for the creation, naming and referencing of records.
- Naming – a unique and meaningful name should be given to each record
- Filing Structure – a clear and logical filing system should be used. The electronic filing system should, where possible,

follow the same structure as manual records. Electronic records should always be saved appropriately on the “F” shared network drive.

- File/Folder Referencing – a referencing system should be used consisting of a Department Code, Record Type Code, Record Number, and Year of Creation.

Where a department scans records for electronic storage, and the records have been confirmed to be present and complete within the electronic filing system on the shared network drives, the original paper copies may be disposed of. Records should be scanned to PDF/A files.

9. Record Disposal

It is important that the disposal of records is adequately documented. Departments must have in place clearly defined arrangements for the assessment and selection of records for disposal, and for documenting this work. The system should ensure that:

- The appropriate records are reviewed and disposed of in accordance with NIMDTA Disposal Schedule (Good Management Good Records)
- Documentation of the disposal/transfer of records is completed and retained.
- Records subject to a Freedom of Information request are not destroyed.

10. Roles and Responsibilities

NIMDTA Board

The Board have overall responsibility for records management within NIMDTA and have approval of all related policies.

Chief Executive

The Chief Executive has a duty to ensure that NIMDTA complies with the requirements of legislation affecting management of the records and with supporting regulations and codes. The Chief Executive is the Personal Data Guardian within NIMDTA.

Governance, IT and Facilities Manager

The Governance, IT and Facilities Manager will work closely with managerial and professional staff to ensure that there is consistency in the management of records and that advice and guidance on good records management is provided. The Governance, IT and Facilities Manager is the Senior Information Risk Owner within NIMDTA and is also an Information Asset Owner.

Data Protection Officer

The Data Protection Officer (DPO) is responsible for overseeing data protection strategy and implementation to ensure compliance with GDPR requirements, under the terms of an SLA with the BSO

Data and Information Systems Manager

The Data and Information Systems Manager is responsible for developing the NIMDTA records management system to meet the guidance issued by the Department of Health NI (Good Management, Good Records) and provides support to the Governance, IT and Facilities Manager.

Heads of Department and Team Leaders

Heads of Department are responsible for ensuring that staff are aware of the arrangements for allowing access to certain types of information and procedures are in place to document decisions concerning access. The

Business Manager, Dental Training Manager, Education Manager, Foundation Training Manager, GP Training Manager, Hospital Specialty Training Manager, Professional Support Manager, Professional Support Officer and Trainee/Trainer Engagement and Excellence Coordinator act as Information Asset Owners.

All Staff

Staff are responsible for ensuring that records and information systems in their areas conform to this policy and to the requirements of the legislation. All members of staff are responsible for documenting their actions and decisions in relation to the records and for maintaining the records in accordance with good records management practice and in compliance with NIMDTA's procedures for the preservation, retention and destruction of records.

11. Review and Monitoring

NIMDTA will follow this policy within all relevant procedures and guidance used for operational activities.

Compliance with this policy will be monitored and subject to periodic review by Internal Audit. The auditors will seek to:

- identify areas of good practice
- highlight where non-conformance to the procedures is occurring
- if appropriate, recommend a tightening of controls and make recommendations as to how compliance can be achieved

Senior management will be responsible for dealing with all issues relating to records management and NIMDTA data protection arrangements. Records management will be a standing item at senior management meetings.

The Director with responsibility for records management will make an annual report to the Board.

Any risks associated with records management will be recorded in NIMDTA Business Support Risk Register. Significant risks will be highlighted in NIMDTA's Corporate Risk Register

12. Training and Awareness

Since all NIMDTA staff are involved in creating, maintaining and using records, it is vital that everyone understands their record management responsibilities as set out in this policy. Managers will ensure that staff responsible for managing records are appropriately trained or experienced and that all staff understand the need for records management. Training in Information Governance will be mandatory for all NIMDTA staff.