Records Management Policy

Policy Type	Business Support
Directorate Area	All Directorates
Policy author / champion	Business Manager / Head of Business Support
Equality Screened	N/A
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1. Introduction

All Health and Social Care (HSC) records are public records under the terms of the Public Records Act (NI) 1923. The Act sets out the broad responsibilities for everyone who works with such records and, as such, RQIA has a statutory duty to make arrangements for the management and safekeeping of its records, and for their retention, storage and eventual disposal.

A record can be described as "information created, received and maintained as evidence and information by an organisation or person, in pursuance of legal obligations or in the traction of business" (International Standard of Managing Record ISO15489). This policy covers all records in all formats: electronic, paper, digital and/or voice; created, collated, processed, used, stored and/or disposed of in the course of RQIA's business.

In the context of Good Management Good Records[1] 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 , Opticians, Pharmacists, agency, or casual staff and all contracted services.

DoH, HSC and Public Safety records are public records as defined in the Public Records Act (NI) 1923.

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); and
- the retention and disposal actions such as destruction or transfer to Public Records Office of Northern Ireland (PRONI) at the appropriate time and procedures for documenting those actions.

[1] https://www.health-ni.gov.uk/articles/gmgr-records-management

RQIA must know what records it has 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 patient/client needs
- public records legislation
- managing records as a valuable and expensive asset
- accountability for practice and service provision
- accountability and quality of information and services

1. Scope

RQIA recognises that the efficient management of its records is necessary to support its core functions and to comply with its legal and regulatory obligations. This policy applies to all RQIA staff and should be read in conjunction with the following:

- RQIA policies and procedures on Information Governance
- RQIA policies and procedures on ICT
- Public Records Act (NI) 1923
- Disposal of Documents Order No 167, 1925
- Limitation Act 1980
- Freedom of Information Act 2000
- International Standard of Records Management (ISO 15489)
- Electronic Records Management: Toolkits (PRO, 2000)
- Data Protection Act 2018: A Guide for Records Managers and Archivists (PRO, PRONI, NAS, in association with ODPC, 2000)
- Records Management Standards and Guidance (PRO, from 1998)
- Northern Ireland Records Management Standards (NIRMS) (2002) (Public Records Office of Northern Ireland)
- The Lord Chancellor's Code of Practice on the Management of Records under Section 46 of the Freedom of Information
- Good Management, Good Records, Guidelines for Managing Records in Health and personal Social Services Organisations in Northern Ireland, DHSSPSNI
- Human Rights Act 1998
- Office of the Ombudsman – The importance of good record keeping

Records should meet RQIA's legal and operational requirements and support accountability in decisions taken by its officers and Board. It is therefore vital that management of information is treated as an administrative discipline which controls all aspects of the record from creation through to disposal in an appropriate manner.

2. The Policy Statement

Information is a corporate asset and RQIA's records are vital in both its current and future work, for the purposes of accountability and for an awareness and understanding of its history.

In consultation with organisations that may be concerned with the management of its records, RQIA will create, use, manage and destroy or retain / preserve its records in accordance with statutory requirements.

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

- captured, stored, retrieved and destroyed or retained/preserved according to need;
- fully utilised to meet current and future needs and to support change; and
- accessible to those who need to make use of it.

All RQIA staff who create, use, manage or dispose of records have a duty to protect them and ensure that any information they add to the record is necessary, accurate and complete. The confidentiality of client and staff records must always be of primary concern to RQIA staff.

Records Management is a specific part of RQIA's Information Governance Strategy and the Information Governance Group[2] is responsible for maintaining the accuracy and relevance of this policy and providing assurance to RQIA's Executive Team and Board as to its implementation and effectiveness.

[2] Information Governance Group includes RQIA SIRO and relevant staff across the organisation responsible for maintaining the accuracy and relevance of this policy (i.e Business Manager and Business Support Officers)

3. Aims and Objectives of Records Management

The aim of this policy is to ensure the quality of RQIA's records; to maintain, retain or dispose of these records in accordance with RQIA's need and legislative requirements and to ensure the permanent preservation of appropriately identified records. The detailed objectives are to:

- ensure that the record is present, accurate and complete
- maintain effective records control systems
- improve information retrieval methods by maintaining effective filing systems
- ensure the record provides a reliable and accountable representation of business activity and, if relevant, provides the rationale behind the decision-making process
- maintain procedures for retention and disposal of records

4. Responsibilities

Records management is recognised as a specific corporate responsibility within RQIA and there is a managerial focus for records of all types in all formats, including electronic records, throughout their life cycle, from planning and creation through to disposal.

The **RQIA Board** will oversee the effective record management by officers of RQIA.

The **Chief Executive** and **Directors** have a duty to ensure that the RQIA complies with the requirements of legislation affecting management of the records and with supporting regulations and codes.

The **Head of Business Support** and members of the **Information Governance Group** will work closely with all staff to ensure that there is consistency in the management of records and that advice and guidance on good records management practice is provided throughout the organisation. The Head of Business Support will co-ordinate the Information Governance Group and the need to establish a coordinating group specific to Records Management will be kept under review.

Senior Managers and **Line Managers** will ensure that records are managed effectively in each service area in accordance with this policy. They are responsible for ensuring staff members are aware of their

responsibilities under this policy and local records management procedures. Specifically they will be responsible for ensuring that:

- any policies, procedures or protocols agreed by RQIA are implemented within their area;
- appropriate employees are designated to assist with the implementation of records management procedures within their area;
- employees are supported in terms of training and development in their adherence to the Records Management Policy and procedures;
- individual patient information, were applicable, is not kept longer than is necessary. Information about individual patients may not be passed on to others without the individual's consent except as permitted under Schedule 2 and 3 of the Data Protection Act 2018 and relevant data sharing protocols issued by DoH;
- staff know what to record, how to record and why to record;
- an inventory of records is maintained which shows the nature and type of records within service function, activity and directorate, is accessible to users and indicates the specific retention periods for those records; and
- staff who record, handle, store or otherwise come into contact with patient information are aware that they have a common law duty of confidence to patients. Such a duty will continue even after the death of a patient.

All members of staff, whether permanent, temporary or contracted, are responsible for documenting their actions and decisions in the records and for maintaining records in accordance with good practice and professional guidelines. All staff are responsible for:

- ensuring they have a clear understanding of records management and demonstrate commitment to duties relating to record keeping;
- creating records which are consistent, reliable, accurate and complete;
- capturing records which authentically document activities in the course of which they were produced;
- filing records correctly in the appropriate area of RQIA's filing system on the server;
- applying security and access controls to records where appropriate; and
- identifying and applying appropriate disposal and retention periods to records.

"Good Management, Good Records" is available to all staff on the intranet and by internet access to the DoH website.

"A guide to Good Record Keeping" is available to all staff on the intranet.

RQIA will seek advice from BSO Information Governance Manager as and when required.

5. Record Filing Structure

RQIA's records are stored electronically on a central server and in paper based format. A process to cease creating paper based / manual folders in which to store records has commenced. Manual and electronic folders are retained and will be managed and disposed of as per RQIA's Retention and Disposal Schedule.

The Head of Business Support will monitor the storage and retention of RQIA's records and, through the Information Governance Group, will ensure RQIA's Operational Procedure for its filing system and guidance within Good Management, Good Records is being followed by all staff.

Should RQIA decide to introduce an Electronic Document and Records Management System (EDRMS) the system will be designed to meet the requirement of the British Standard BS 10008 to ensure authenticity of records during legal proceedings and the records registration process will be reviewed and revised for consistency.

6. Retention and Disposal of Records

All records should be retained and disposed of in accordance with RQIA's Retention and Disposal Schedule, adapted from the Department of Health's Good Management, Good Records (GMGR).

A regular quality check of RQIA's filing system will be undertaken by the nominated staff within the Business Support Unit. In liaison with RQIA's Executive Team and approval of the Chief Executive, relevant manual and electronic files will be archived, disposed of, and, where relevant, forwarded to PRONI for permanent preservation.

7. Monitoring Compliance

Monitoring of compliance with this policy will be undertaken by RQIA's Information Governance Group, reporting any issues to RQIA's Executive Team in order to agree any changes required or action to be taken.

An assessment of compliance with requirements within the Information Management Assurance Checklist will be undertaken each year. Annual reports and proposed action/development plans will be presented to the Executive Team, RQIA Audit and Risk Committee and Board for approval.

8. Equality

This policy has been screened for equality implications are required by Section 75 and Schedule 9 of the Northern Ireland Action 1998. No significant equality or human rights implications have been identified. The policy will therefore not be subject to equality impact assessment.