



CORPORATE POLICY & PROCEDURE NO. 17

LIFECYCLE STRATEGY

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1. Introduction

- 1.1 This document sets out an overarching framework for integrating current records management initiatives, as well as recommending new ones. It defines a strategy for improving the quality, availability and effective use of records in the Trust and provides a strategic framework for all records management activities. This will enable overall coordination of all records management activities and ensure alignment with the Trust's business strategies.
- 1.2 The Information Lifecycle strategy should be read in conjunction with the Information Lifecycle Policy.

2. Scope

- 2.1 This strategy relates to all clinical and non-clinical operational records held in any format by the Trust as detailed in the Department of Health's publication *Records Management: NHS Code of Practice*, ie:

- all administrative records (eg personnel, estates, financial and accounting records, notes associated with complaints etc); and
- all patient health records for all specialties

- 2.2 These include records held in all formats, for example:

- paper records, reports, diaries and registers etc;
- electronic records;
- x-rays and other images;
- microform (ie microfiche and microfilm); and
- audio and video tapes.

3. Aims

- 3.1 The aims of the Trust's Information Lifecycle strategy are to ensure:
- a systematic and planned approach to records management covering records from creation to disposal;
 - efficiency and best value through improvements in the quality and flow of information, and greater coordination of records and storage systems;
 - compliance with statutory requirements;
 - awareness of the importance of records management and the need for responsibility and accountability at all levels; and
 - appropriate archiving of the Trust's important records.

4. Key Elements

4.1 The Information Lifecycle strategy comprises the following key elements:

4.1.1 Responsibility and Accountability

To provide a clear system of accountability and responsibility for record keeping and use

It is important that all individuals in the Trust appreciate the need for responsibility and accountability in the creation, amendment, management, storage of and access to all Trust records. A major target is therefore to have a clear chain of managerial responsibility and accountability for all records created by the Trust. This is the prerequisite for an effectively coordinated records management strategy.

4.1.2 Record Quality

To create and keep records which are adequate, consistent, and necessary for statutory, legal and business requirements

Trust records should be accurate and complete, in order to facilitate audit, fulfil the Trust's responsibilities, and protect its legal and other rights. Records should show proof of their validity and authenticity so that any evidence derived from them is clearly credible and authoritative.

4.1.3 Management

To achieve systematic, orderly and consistent creation, retention, appraisal and disposal procedures for records throughout their life cycle

Record-keeping systems should be easy to understand, clear, and efficient in terms of minimising staff time and optimising the use of space for storage.

4.1.4 Security

To provide systems which maintain appropriate confidentiality, security and integrity for records in their storage and use

Records must be kept securely to protect the confidentiality and authenticity of their contents, and to provide further evidence of their validity in the event of a legal challenge.

4.1.5 Access

To provide clear and efficient access for employees and others who have a legitimate right of access to Trust records, and ensure compliance with Access to Health Records, the General Data Protection Regulation (GDPR), Data Protection Act 2018 (DPA 2018) and Freedom of Information legislation

Access is a key part of any Information Lifecycle strategy and links strongly to records management. Fast, efficient access to records unlocks the information and knowledge they contain.

4.1.6 Audit

To audit and measure the implementation of the Information Lifecycle strategy against agreed standards

The performance of the information lifecycle and records management programme will be audited.

4.1.7 Training

To provide training and guidance on legal and ethical responsibilities and operational good practice for all staff involved in records management

Effective records management involves staff at all levels. Training and guidance enables staff to understand and implement policies, and facilitates the efficient implementation of good record keeping practices.

5. Implementation

5.1 The action points, in the table below, have been developed from the Trust's Information Lifecycle Policy which requires the following fundamentals to be present:

- existence of an overall policy statement on how records (including electronic records) are to be managed;
- endorsement of policy by senior management;
- dissemination of policy to staff at all levels;
- provision of corporate mandate for the performance of all records and information functions;
- organisational commitment to create, keep and manage records which document activities;
- definition of roles and responsibilities;
- definition of responsibility of personnel to document actions and decisions in the records and to dispose of obsolete records;
- provision of framework for supporting appropriate standards, procedures and guidelines;
- provision of monitoring mechanisms to ascertain compliance with appropriate standards, procedures and guidelines; and
- review of policy at regular intervals (at least once every three years).

The key elements of this strategy will be implemented as follows:

Strategic Goal	Objective	Action
1 Responsibility and Accountability	To provide a clear system of accountability and responsibility for records	Establish an Information Lifecycle strategy with processes for ongoing monitoring and review
		Secure senior management 'buy-in' to improving records management, and the designation of a senior manager to be responsible for records management
		Establish a Records Management function (to manage all Trust records), with clearly defined terms of reference and links to other Information Governance functions eg Freedom of Information, Data Protection, Risk Management etc.
		Appoint a qualified Records Manager/ or designate the Information Governance Manager or another manager to have responsibility for Records Management/Information Lifecycles
		Manage implementation of the Information Lifecycle strategy, including provision of advice on records management, establishment of good practice guidelines and of compliance with relevant legislation and NHS guidance
		Provide contacts through which the

Strategic Goal	Objective	Action
		Information Governance Manager can aid and support departments, and provide better co-ordination of record keeping across the Trust. Individual Departments to nominate local records managers
		<p>Develop job descriptions, listing duties and essential attributes required for staff assigned records management roles (eg Records Manager, local records managers etc)</p> <p>Ensure that job descriptions across the Trust include relevant references to record keeping responsibilities</p>
		Review Human Resource policies and practices to recruit and retain good quality personnel for the records management function
		Provide an appropriate competency framework, to identify the knowledge, skills and corporate competencies required for records and information management
		Undertake regular reviews and analysis of records management training needs
		Provide a professional development programme for records management staff

Strategic Goal	Objective	Action
		Ensure inclusion of records management and information issues and practices in induction training programmes for all new staff
		Allocate appropriate resources across the Trust to enable the maintenance of the records management function
2 Record Quality	To create and keep records which are adequate, consistent, and necessary for statutory, legal and business requirements	Develop guidance on good practice with the aim of establishing common and consistent standards of record creation and record keeping within the Trust, taking into account current GDPR, DPA 2018, Data Protection and Freedom of Information legislation
		Reduce the duplication of records to improve information sharing, reduce cost and save space
		<p>Develop procedures and metadata (descriptive and technical documentation) to ensure the authenticity and evidential value of records held in electronic form</p> <p>When scanning, digitising and then storing records electronically, consider legal admissibility by adopting the procedures recommended in the BSI publication '<i>BIP 0008:2004 Code of practice for legal admissibility and evidential weight of information stored electronically</i>'</p>

Strategic Goal	Objective	Action
		Identify all records vital to the continuing functioning of the activities of the Trust in the event of disaster and make provision for their protection (to be cross-referenced with the Trust Risk Management Strategy)
3 Management	To achieve systematic, orderly and consistent creation, appraisal, retention and disposal procedures for records during their lifecycle	Review existing records management practices to establish what needs to be done to comply with the <i>Records Management Code of Practice for Health & Social Care 2016</i>
		Undertake an inventory of all Trust records, both health and corporate records held in either hard copy or electronic formats. (This is to ensure that all record collections/information sets are identified along with the volume of records held, the type of media on which they are held, their physical condition, their location, the environmental conditions in which they are stored and the responsible manager. See ' <i>Records Management Roadmap: Records Inventory Guidance</i> ')
		Produce Trust records retention schedules consistent with the NHS Retention and Disposal schedules detailed in the <i>Records Management Code of Practice for Health & Social Care 2016</i>

Strategic Goal	Objective	Action
		Establish procedures for the continuous monitoring of the records management process to ensure that legal and statutory requirements are met and new types of records have a lifecycle determined at the point of creation
		Develop a selection policy to identify which records are likely to be suitable for permanent preservation. Establish contact with an approved archival institution with appropriate storage and public access facilities
		Establish a system for managing records' appraisal and for recording the disposal decisions made
		Plan resource requirements to take account of the volume and nature of the records due for appraisal
		Establish procedures for the closure of records when no longer current, secure storage of archived records, and effective disposal, as soon as appropriate
		Identify a secure and confidential method for the disposal of records, and organise its implementation

Strategic Goal	Objective	Action
		Maintain a log of records which have been destroyed showing their reference, description and date of destruction
		Assess the risks associated with the destruction of record or any delay in appraising them
		(Whilst electronic records are subject to the same creation, appraisal, retention and disposal process as paper records) develop guidance as appropriate to take into account the particular technical requirements of electronic media
4 Security	To provide systems which maintain appropriate confidentiality, security and integrity for records in their storage and use	Develop and promulgate policies and procedures to protect records from unauthorised alteration or erasure, to ensure that access to records is properly controlled, and to maintain adequate audit trails to track the use and location of records held
		Implement secure storage arrangements for information and documents, while allowing access by authorised personnel
		Organise appropriate storage accommodation for active paper records

Strategic Goal	Objective	Action
		secure from fire, flood and theft, which is also secure and safe from unauthorised access
		Organise the relocation of paper records into appropriately secure storage when they are no longer required for the conduct of current business, to await disposal and at the same time meeting standards to ensure that no environmental damage is caused whilst also providing security and having strictly controlled access for authorised personnel only
		Develop appropriate Information Sharing Protocols and Subject Specific Information Sharing Agreements for the exchange of confidential and personal information
		Provide guidance on 'back-up', archiving processes and audit trails for electronic records, as well as on measures to prolong their access and use for as long as required, including migration across systems and onto different types of media
		Develop and ensure that standards for the safe and secure transportation of records are strictly applied especially person and patient identifiable information
		Develop and implement a full and tested contingency or business recovery plan

Strategic Goal	Objective	Action
5 Access	To provide clear and efficient access for employees and others who have a legitimate right of access to Trust records, and ensure compliance with GDPR, DPA 2018, current Data Protection and Freedom of Information legislation	Implement effective tracking systems and audit trails, ensuring that information can be retrieved effectively and speedily when required
		Develop systems to determine any access restrictions at the point of records creation
		Implement policies and procedures to address the particular requirements of Freedom of Information in relation to agreed publication schemes and meeting requests for information by the public that follow the procedures established by the Trust's Freedom of Information Policy
6 Audit	To audit and measure the implementation of the records management strategy against agreed standards.	Establish standards for records management performance (eg response to subject access and Freedom of Information requests, record keeping, availability etc) and monitor the performance of the function
		Provide advice and support for records departments in meeting agreed standards
7 Training	To provide training and	Provide (for all staff, departmental managers,

Strategic Goal	Objective	Action
	guidance on responsibilities and good practice for all staff involved with records.	and in particular for local record managers); procedure manuals and instructions, guidance on good practice, and advice on procedural issues and requirements. These instructions should cover all records management systems within the Trust, information quality and security, data protection, information handling, and legislative and statutory requirements
		Raise the profile of records management within the Trust through publicity about the issues involved and the staff responsible
		Develop training programmes and materials, including instruction on the concepts and basics of records management to be targeted at new and existing staff who need a basic awareness of the issues and procedures and those who need more detailed instruction on records management policies and procedures, in particular the local records managers
		Provide specific training and instruction on GDPR, DPA 2018, Data Protection and Freedom of Information legislation

6. Review

- 6.1 This strategy will be reviewed every 3 years (or sooner if new legislation, codes of practice or national standards are to be introduced).

7. References

- Records Management Code of Practice for Health & Social Care 2016
- Lifecycle Policy
- Data Protection Policy
- Freedom of Information Policy
- Information Governance Strategy and Policy

8. Equality Statement

- 8.1 The Trust is committed to promoting positive measures that eliminate all forms of unlawful or unfair discrimination on the grounds of age, marital status, disability, race, nationality, gender, religion, sexual orientation, gender reassignment, ethnic or national origin, beliefs, domestic circumstances, social and employment status, political affiliation or trade union membership, HIV status or any other basis not justified by law or relevant to the requirements of the post.
- 8.2. By committing to a policy encouraging equality of opportunity and diversity, the Trust values differences between members of the community and within its existing workforce, and actively seeks to benefit from their differing skills, knowledge, and experiences in order to provide an exemplary healthcare service. The Trust is committed to promoting equality and diversity best practice both within the workforce and in any other area where it has influence.
- 8.3. The Trust will therefore take every possible step to ensure that this procedure is applied fairly to all employees regardless of race, ethnic or national origin, colour or nationality; gender (including marital status); age; disability; sexual orientation; religion or belief; length of service, whether full or part-time or employed under a permanent or a fixed-term contract or any other irrelevant factor.
- 8.4. Where there are barriers to understanding e.g. an employee has difficulty in reading or writing or where English is not their first language additional support will be put in place wherever necessary to ensure that the process to be followed is understood and that the employee is not disadvantaged at any stage in the procedure. Further information on the support available can be sought from the Human Resource Department