

# Health Records Management Strategy

## Policy information

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Sustainable Resources Committee

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## Summary of document:

This strategy addresses the principles and practice for managing health records within Hywel Dda University Health Board.

## Scope:

This strategy has been written to provide an overarching framework of professional advice and guidance for all Hywel Dda University Health Board staff, to ensure compliance with all legal requirements for the maintenance, storage and provision and security of records. The strategy defines standards for improving the quality, availability and effectiveness of records management activities. This strategy applies to all permanent, temporary or contracted staff employed by Hywel Dda University Health Board (including Executive and Non – Executive Directors).

## To be read in conjunction with:

[\[192\] – Health Records Management Policy](#) – opens in a new tab

[\[193\] – Retention and Destruction of Records Policy](#) – opens in a new tab

[\[249\] – Access to Health Records Policy](#) – opens in a new tab

[\[172\] – Confidentiality Policy](#) – opens in a new tab

[\[836\] – All Wales Information Governance Policy](#) – opens in a new tab

[\[837\] – All Wales Information Security Policy](#) – opens in a new tab

[\[347\] – Corporate Records Management Policy](#) – opens in a new tab

## **Patient information:**

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Click or tap to enter a date. Executive Director job title:

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1 New policy September 2012

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3 DPA update 26.6.2018

4 Full review

### **Keywords**

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### **Glossary of terms**

Records management - is that “field of management responsible for the efficient and systematic control of the creation, receipt, maintenance, use and disposal of records, including processes for capturing and maintaining evidence of and information about business activities and transactions in the form of records”.

A record - A health record is “one which relates to the physical or mental health of an individual which has been made by or on behalf of a health professional in connection with the care of that individual”. Anything that contains information that has been created or gathered as a result of any aspect of the work of NHS employees.

Data Protection Act 2018 - The Data Protection Act 2018 is a United Kingdom Act of Parliament which updates data protection laws in the UK. It is a national law which complements the European Union's General Data Protection Regulation and replaces the Data Protection Act 1998.

Information Security - The protection of information and information systems from unauthorised access, use, disclosure, disruption, modification, or destruction in order to provide confidentiality, integrity, and availability.

Public Records Act 1958 - The Public Records Act 1958 is an Act of the Parliament of the United Kingdom forming the main legislation governing public records in the United Kingdom.

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## Introduction

This strategy addresses the principles and practice for managing health records within Hywel Dda University Health Board (HDUHB). The organisation uses a hybrid of computer and paper records to support patient processes and patient care and the strategy establishes how all patient records will be managed. Health Records management is about the proper content, control, security, storage and ultimate destruction of records. Records created and held by HDUHB as part of its functions, are public records under the Public Records Act 1958. The Public Records Act 1958 requires that there is a systematic and planned approach to the management of records within an organisation.

Effective management of healthcare services can only be achieved if there are appropriate health records management policies and processes in place. Health records management falls within the remit of the Health Records service. The aim of the health records service is to ensure that procedures are in place to bring together the health professional and accurate, relevant patient information/documentation at the correct time and place, to support patient care. Records management is a key component of the health records service and an expert professional field. The correct creation, management and maintenance of the health record provides the communication tool between the health professional and the patient.

The strategy details the aims, aspirations and targets of what we want to achieve with our health records management programmes and provides direction within the organisation. The Board, Executive Team, senior management and all who work for the organisation have responsibilities to ensure that information is handled appropriately and functions are performed in line with the required records management standards, ensuring the accuracy and availability of records for patient care.

The strategy will be updated as required to include future developments such as updated health records management guidance, to reflect technological changes such as the introduction of scanning services and the possible migration to an electronic patient record or changes in legislation.

This strategy is based on the requirements of the Records Management Code of Practice for Health and Social Care. This document covers management of all types of NHS health records throughout their lifecycle, from their creation and use, to their final disposal. This strategy should be read in conjunction with other HDUHB policies e.g. HDUHB Health Records Management Policy, Retention and Destruction Policy, Access to Health Records Policy etc and also the Data Protection Act.

## Scope

This strategy has been written to provide an overarching framework of professional advice and guidance for all Hywel Dda University Health Board staff, to ensure compliance with all legal requirements for the maintenance, storage and provision and security of records. The strategy defines standards for improving the quality, availability and effectiveness of records management activities. The strategy clearly identifies all critical elements of effective records management and identifies key individuals within HDUHB and their obligation to ensure records are managed in accordance with legal requirements and both national and local standards.

This strategy relates to all clinical operational records held in any format by the HDUHB. Within the strategy the terms 'Health Record', 'Patient Record' and 'Case record' are synonymous and include:

- Records of patients treated by HDUHB including health and care records
- Records of private patients treated on NHS premises
- Records of patients treated on behalf of the NHS in the private healthcare sector

Health Records may be held in many formats, for example:

- Personal health records (electronic, microfilmed, scanned images & paper based)
- Theatre Registers and all other registers that may be kept
- X-ray and imaging reports, output and images
- Photographs, slides and any digital images
- Audio and video tapes, cassettes
- Digitised images/Digital Records (scanned)
- Emails
- Text messages (SMS)

**This list is not exhaustive.**

This strategy applies to all permanent, temporary or contracted staff employed by Hywel Dda University Health Board (including Executive and Non – Executive Directors).

## Aim

The aim of the Health Records Management Strategy is to provide an overarching framework for current records management activities and initiatives, as well as any new ones recommended in the future. The Strategy will ensure there is:

- a systematic and planned approach to health records management covering health records from creation to disposal.
- efficiency and best value for money through improvements in the quality and flow of information, and greater co-ordination of health records and storage systems.
- compliance and delivery with statutory and legislative requirements.
- awareness of the importance of health records management and the need for responsibility and accountability at all levels.
- appropriate archiving of non-current health records.
- improve data quality to ensure accuracy and consistency.
- provide assurance around governance, confidentiality and data protection.

## Objectives

The objectives of the strategy is to define an agreed approach for improving the quality, availability and effective use of records in the HDUHB and provide a strategic framework for all records management processes and procedures. This will enable overall coordination of all records management activities and ensure alignment with the HDUHB's business model. The key objectives associated with the strategy is improved patient safety and quality of care with the deliverable benefits being:

- the improved maintenance of the history of patient care and better communication and information sharing between care providers and patients
- greater efficiencies from the improved management of clinical functions
- reduced duplication of effort
- greater accountability and corporate governance
- reduction in litigation costs through improved patient safety and ability to defend against claims
- compliance with legislation and best practice record standards.

## Responsibility and Accountability

There should be a clear chain of management, accountability and responsibility for all records created and utilised within the HDUHB. The Chief Executive has overall accountability for ensuring that records management operates appropriately and a duty to make arrangements for the adequate resourcing and safekeeping of all HDUHB records. The Chief Executive may delegate responsibility for records management arrangements within the organisation to a designated Executive, who is responsible for ensuring appropriate mechanisms are in place to support service delivery and continuity. The Medical Director has particular responsibilities for patient records as the Caldicott Guardian of the HDUHB.

The health records manager has strategic and operational accountability for the creation, retrieval, storage, archiving and disposal of all health records within the HDUHB. The HDUHB has in place a documented [191 - Health Records Management Policy](#) and [193 - Retention and Destruction Policy](#) – opens in a new tab - and detailed documented procedures, to support the life span of a health record from creation to disposal.

All staff should be aware of their individual responsibility and accountability in the creation, management, storage and access to all HDUHB records. More detailed information in regards specific HDUHB roles and responsibilities can be found in the [191 - Health Records Management Policy](#) – opens in a new tab.

## Standards of Records Management

The Health Records Management Strategy comprises of the following key elements.

### Record Quality

The Health Records Management Strategy aims to provide assurance that policies and procedures are in place to ensure that the patient and health professional, together with accurate, relevant, reliable patient information and documentation are available at the correct time and place to support effective and safe patient care. HDUHB records should be accurate and complete, in order to facilitate audit and fulfil the HDUHB'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. Records should be retained securely and should only be shared or merged where appropriate. The [192 - Health Records Management Policy](#) – opens in a new tab- and appendix of policies and procedures provide further detail specifically on standards for the management of health records. Health records are managed in accordance with the standards detailed in the introduction of this strategy.

### Management

All health records are subject to the standards and legislation detailed in this strategy and the HDUHB is responsible for ensuring that health records are managed accordingly. 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. The [192 - Health Records Management Policy](#) – opens in a new tab - details procedures for the storage, retrieval, archiving and disposal of each record type. This strategy is in accordance with the Welsh Records Management Code of Practice for Health and Social Care.

There should be a consistent approach to records management across the HDUHB, which should be in line with external guidance. The HDUHB is responsible for ensuring that adequate resources are made available to support effective records management, including making adequate provision for records growth and technological developments which enable records to be stored or transferred to other media. Investment in the move from paper to electronic records will become critical and will support improved patient care and service delivery not only within the health records service but across the entire HDUHB.

### **Security**

The HDUHB provides systems which maintain appropriate confidentiality, security and integrity for all health records including 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. No person identifiable information should be stored, transferred or accessed unless absolutely necessary.

Health records in any format are highly confidential documents and the HDUHB is responsible for ensuring that adequate physical controls are put in place to ensure the security and confidentiality of all patient identifiable information, whether they are held manually (physically) or on computer (electronically). Other relevant policies and procedures are documented, including the [837 All Wales Information Security Policy](#) – opens in a new tab - and they should be utilised in conjunction with local departmental procedures.

### **Access**

Access is a key part of any records management strategy. Fast, efficient access to records unlocks the information and knowledge they contain. There should be clear and efficient access for employees and others who have a legitimate right of access to HDUHB records. Access to all patient identifiable information is on a strict need to know basis in accordance with the Caldicott principles, Data Protection Act 2018, General Data Protection Regulation, Information Governance Standards and various codes of professional conduct. Health Records Policies, including the [249 Access to Health Records Policy](#) – opens in a new tab - and supporting procedures governing access to patient identifiable information all comply with and are in accordance with these principles.

The public has rights of access to all information held by the HDUHB, unless that information is covered by an exemption. Not only must records be maintained appropriately, when it is necessary to pass them to another user or stakeholder, care must also be taken to ensure that they are dispatched in a manner suitable to the content of the records. All managers are responsible for ensuring that there is an appropriate system for tracking and retrieving records when requested legitimately and that non-legitimate requests for records are declined.

Health records and associated clinical information are released to patients, their representatives and legal bodies in accordance with relevant and current legislation, including:

- Access to Health Records Act 1990
- Data Protection Act 2018
- General Data Protection Regulation (UK GDPR)

**This list is not exhaustive.**

The Health Records Manager is responsible for the processing and release of clinical information in accordance with the [249 Access to Health Records Policy](#) – opens in a new tab - and documented procedures.

### **Retention and Disposal**

Retention is the holding of records after their creation in readiness for operational use. It is a fundamental requirement that all the HDUHB records are retained for a minimum period 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 the HDUHB's business and clinical functions. The Records Management Code of Practice for Health and Social Care establishes the minimum retention periods for a number of records and these requirements are reflected in the [193 Retention and Destruction Policy](#) – opens in a new tab.

When considering how long to retain a record staff should first note any legal or HDUHB requirement. Records should be retained for the identified minimum requirements and storage in excess of the specified retention period is undesirable. During the retention period appropriate arrangements must be made for the safe storage and effective security of the record and considerations should be given to the storage medium (electronic or paper). Records no longer needed for operational or any other use should be destroyed. It is particularly important that the disposal of records, which is defined as the point in their lifecycle when they are either transferred to an archive or destroyed, is undertaken in accordance with clearly established policies and always through confidential processes.

### **Legislation**

This strategy is based on current legal and statutory obligations and best practice and processes for records management. The Strategy also takes into account the recommendations and standards set by:

- Public Records Act 1958;
- Medical Reports Act 1988;
- The Computer Misuse Act 1990;
- Access to Health Records Act 1990;
- Data Protection Act 2018;
- Human Rights Act 2000;
- Freedom of Information Act
- Welsh Assembly Government (Ministerial Letters, Circulars and Policies);
- Caldicott: Principles into Practice;
- Information Sharing Protocols - Wales Accord on the Sharing of Personal Information
- Data accreditation and data quality

The strategy will be updated as required to include future developments such as updated health records management guidance, updates to statutory legislation, policies, protocols, Acts, etc and to reflect technological changes.

### **Risk Management and Patient Safety**

Systems, policies, procedures and processes are in place to ensure that any risks to the record or the patient as a result of record issues, are identified, assessed and managed according to best practice.

## Audit

This Health Records Management Strategy will be audited accordingly based on compliance against the aims, objectives and responsibilities outlined within the [192 - Health Records Management Policy](#) – opens in a new tab.

## Training

As the volume and complexity of clinical information increases, we demand the highest standards of performance in the way it is gathered, recorded, stored and transmitted. These requirements are set out in the Introduction of this strategy and throughout the document. Implementation of the strategy, within the HDUHB will put in place explicit guidance on legal and ethical responsibilities for all NHS staff involved with the creation, maintenance and ongoing management of health records. By utilising appropriately referenced publications, the Strategy will ensure compliance with legislation, nationally recognised standards and best practice.

Ongoing workforce education plays a major part in preparing NHS staff to deliver effective, high quality services. There are numerous reasons for providing education and training in information handling, including maintenance and improvement of services, respect to patients as well as the need to comply with legislation in respect of data collection, storage and use. Appropriate training will be given to all health records staff on the systems used to maintain records and these will meet local and national standards. The Health Records service is able to support awareness sessions or bespoke sessions as and when required to increase the awareness of individual staff responsibilities in regards records management. Self-learning modules are available to all staff through the HDUHB's intranet and ESR application.