



Records Management Procedure

Introduction and Aim

This procedure seeks to:

- Confirm the principles that guide staff on the correct way to, create, store and manage records effectively.
- Establish standardised principles and procedures to ensure

PHW:

- Has a clear process for managing records through their life cycle
- Clearly defines the roles and responsibilities for all groups of staff.
- Clearly outlines the expectations and requirements for managing records.

Linked Policies, Procedures and Written Control Documents

- Records Management Policy
- All Wales Information Governance Policy
- Information Security Policy
- Guidance on Records Creation, Retention and Destruction of Records

Scope

This procedure is applicable to all Public Health Wales Staff, including those with honorary contracts.

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Author	Katie Donelon, Head of Records Management
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1. Introduction

Corporate records are a vital and unique source of information for the management of an organisation and its business, evidence of activities and conduct, knowledge about expertise, work, and achievements. This document will set out the Public Health Wales procedures for the safe storage and retention of its records and how Public Health Wales will dispose of records in keeping with the Data Protection Act, the UK General Data Protection Regulation, The Lord Chancellor's Code of Practice on the Management of Records and the Records Management Code of Practice for Health and Social Care 2022.

There are a number of definitions of a record, which are useful to highlight. The ISO standard ISO 15489-1:2016 defines a record as: "Information created, received, and maintained as evidence and as an asset by an organisation or person, in pursuance of legal obligations or in the transaction of business."

Documents are the initial stages of a record, usually before they are formalised and approved. A record provides detail of a point in time, where decisions are made and recorded, policies and procedures are agreed and changes that affect staff and service users are implemented.

Documents are usually draft versions; records are final and where necessary, formally approved.

1.1 Scope

This procedure is applicable to all employees, secondees, honorary contracted staff, volunteers and contractors who have access to such records.

This procedure covers all records in all formats including electronic, paper, and other media i.e., CCTV recordings and Photographs.

1.2 Active Records Management

Active Records Management is a systematic and consistent control of all records throughout their life cycle. Every aspect of a record's life must be controlled: how they are produced or received, organised, and indexed, moved, stored, retrieved, retained and destroyed or stored permanently as archives. A complete list must be kept of active, inactive, archived and destroyed records.

Public Health Wales Board has taken a decision to implement SharePoint Online as the main Electronic Document Records

Management System (EDRMS) for the organisation and as such, unless another document repository has been allocated, for example, for infectious disease monitoring and control or Screening purposes, all staff are required to use SharePoint Online for this purpose.

When a document is saved for the first time **must** be given an appropriate descriptive name which describes the content. To this end, common sense should be used when naming a document /record, but the following naming convention format should be used to enable anyone who may be searching for the document to identify it easily. A pre-fix to the document type is given to give a clearer indication of the document, in addition to Metadata.

2. Legislative Framework

Public Health Wales has legal requirements for the accurate storage, retention and destruction under the following public authority acts:

- Public Records Act 1958 and Local Government Act 1972
- Freedom of Information Act 2000, specifically The Lord Chancellors Code of Practice in the Management of Records
- UK GDPR (General Data Protection Regulations) and Data Protection Act 2018
- Health and Social Care Act 2008
- **Health and Social Care (Quality and Engagement) (Wales) Act**

Other legislation requires information to be held as proof of an activity against the eventuality of a claim. Examples of legislation include the Limitation Act 1980 or the Consumer Protection Act 1987. The Limitation Act sets out the length of time in which a legal case could be brought after an event and sets it at six years.

3. Roles and Responsibilities

All staff (including employees, secondees, honorary contracted staff, volunteers and contractors.) will.

- In practice, all staff are responsible for any records which they create or use. This responsibility is established at, and defined by, the law under the Public Records Act 1958, Freedom of Information Act 2000, and the UK GDPR. Furthermore, as an

employee of the NHS, any records created are public records and it is the responsibility of **all staff** to ensure that they keep appropriate records of their work in Public Health Wales and manage those records in keeping with this procedure and with any guidance subsequently produced on behalf of Public Health Wales.

- This applies to all records, however, in relation to records that contain personal data, everyone working for or with the NHS who records, handles, stores, or otherwise comes across information has a personal common law duty of confidence. The UK GDPR and The Data Protection Act 2018 now places statutory restrictions on the use of personal information, including health information.
- All staff will adopt SharePoint as the main document store for record types that were previously held in network drives, except for Staff Records, until an alternative solution is established and where alternative arrangements are in place, for example where records are held within systems such as iPassport, Tarian and the Screening systems. Staff must utilise designated Metadata columns within SharePoint to allow for easy searchability of documents and records. All existing records DO NOT need to be transferred over to SharePoint; SharePoint will be adopted for NEW records from the end of the Directorate transition date.

Managers and Business Managers (or designated Records Management leads such as super users, where this role has been established locally) will:

- Support the wider team/division with the development of their SharePoint sites, including identifying the appropriate Metadata columns required for search-ability.
- Support with decision making around the possibility of any documents that need to be transferred from network drives, but this must be kept to a minimum.
- Ensure records that reach the end of their required retention period are deleted/destroyed confidentially and in line with current procedures and any records that need to be retained are done so in line with legislative requirements.
- Inform the Records Management Team at the earliest opportunity of any requirements to change staff access permissions to document libraries.

The Head of Records Management, with support from the Records Management Team will:

- Support staff with the creation and development of SharePoint, to include documented changes in permissions.
- Facilitate and support with training on Records Management procedures and the functionality of SharePoint.
- Be the first point of contact for queries, via PHWRecords.Management@wales.nhs.uk
- Support the Directorates with considerations and decision making on what (if any) records require transferring from network drives.
- Develop and implement an audit process for SharePoint sites, ensuring they are used correctly and effectively.
- Support staff with training and support on how to use the various elements and apps within SharePoint.

The Information Governance Service will:

- Support IOA and all staff with identifying when new assets should be included on the IAR (Information Asset Register) via the DPIA (Data Protection Impact Assessment) process.
- Advise all staff on IG (Information Governance) requirements of records storage where the document contains personal or sensitive data.

Executive Directors and members of the Executive Team will:

- Support the implementation of SharePoint as the designated Electronic Document Records Management System.
- Directors of Divisions within Public Health Wales are responsible for ensuring that the policy is implemented in their individual divisions. They will nominate departmental representatives, who will liaise with Public Health Wales Head of Records Management and Information Governance Managers on the management of records in that directorate.
- Records management responsibilities are included or will be written into all accountable individuals' job descriptions and clear procedures for retention of key records issued.

4. Implementation of the Procedure

4.1 Public Health Wales Live and Active Records

Public Health Wales is working towards a consistent organisational approach to the storage and naming of records of similar types,

though there are distinct differences in the records created and stored in each Directorate. The Records Management team has developed a simplified approach for naming conventions, due to the enhanced search capabilities using Metadata tagging, to ensure the easy retrieval of documents in the future. Documents should be named clearly, and staff should be able to identify the contents of the document or record, by the document name/title. Further guidance on naming conventions is available in [PHW Guidance on Record Creation, Retention & Destruction](#)

The Records Management Team will be a point of contact for questions and support in the creation and development of SharePoint sites, as well as undertake auditing activities to ensure records are being managed effectively moving forward.

4.2 Records Storage

Directorates, Divisions and teams must ensure that they have appropriate arrangements for secure and safe storage of records. The level of security and access will depend on the record's nature and value to Public Health Wales. Confidential and/or sensitive records or those which have permanent (archival) value must be secured appropriately, whether electronic or hard copy, and access must be audited and controlled.

All records must be stored with appropriate Metadata attached. This Metadata can be decided on a Directorate/divisional/team basis, depending on the type of document library or the needs for the service.

It is the responsibility of the Executive Director to ensure that appropriate arrangements and, if necessary, local procedures are in place to advise staff and to ensure compliance. It is the organisational policy that all organisational records should be stored within SharePoint Online, except for Staff Records, until an alternative solution is established and unless an alternative software system has been designated, for example iPassport or specific systems for Screening or Infection Control purposes.

Where records are NOT stored within SharePoint, this information must be recorded on the Register of Repositories. Please contact PHWRecords.Management@wales.nhs.uk to do this.

Annex 3 is a link to the Register of Record Repositories that has been created by the Records Management project team, detailing the storage areas for all records across the organisation, prior to the

introduction of SharePoint Online. It is the responsibility for each Directorate, Division and team to ensure to contact the Records management Team (PHWRecords.Management@wales.nhs.uk) if the storage location is changed. **The register will contain details of all records that are NOT held in SharePoint.**

4.3 Disposal of unwanted Public Health Wales records

All Public Health Wales staff dealing with the active management of records must adhere to **Annex 1** the "Retention and Destruction Schedule". Guidance for the retention and disposal of records is taken from the NHS Code of Practice on Records Management (part 2).

This procedure is a working list and will be subject to regular updates, as the needs of the service & legislation changes dictate.

When records are disposed of in line with the procedure, it is essential that the method used ensures that confidentiality is safeguarded at every stage and that full and complete records of destruction are kept for an audit trail, to show exactly what has been destroyed, by whom and when.

4.4 Incident Management

In the event of a major incident such as an outbreak, a specific SharePoint Site may need to be created for the management of records in relation to that incident, allowing all records to be stored in one place with assigned Metadata and tagging to facilitate an organised approach and simpler way to locate records later if required.

To request a site to be created, contact PHWRecords.Management@wales.nhs.uk

5. Monitoring Compliance

The Records Management Team have been tasked with conducting audit on the management of records throughout Public Health Wales. Records Management arrangements, especially for confidential and sensitive records will form part of this audit.

5.1 Managerial Accountability and Responsibility

The **Chief Executive** has overall responsibility for ensuring that records are managed responsibly within the Trust.

The **Trust Head of Records Management** is responsible for co-ordinating records management in the organisation and identifying key corporate records and providing guidance and advice on their management and retention.

5.2 Individual Responsibility

In practice, all staff are responsible for any records which you create or use. This responsibility is established at, and defined by, the law. Furthermore, as an employee of the NHS, any records which you create are public records and it is the responsibility of **all staff** to ensure that they keep appropriate records of their work in Public Health Wales and manage those records in keeping with this procedure and with any guidance subsequently produced on behalf of Public Health Wales.

Everyone working for or with the NHS who records, handles, stores, or otherwise comes across information has a personal common law duty of confidence. The UK GDPR and The Data Protection Act 2018 now places statutory restrictions on the use of personal information, including health information.

6. Retention Schedule

The records held within Public Health Wales vary in terms of requirement of retention. There is no common requirement for time they are stored. **Annexes 1 and 2** contain details of each record type and how long they are required to be retained. Some have mandatory retention periods, which are set in legislation. Others have retention periods which are defined by their value to Public Health Wales. Once a record is no longer required, steps can be taken to destroy that record or move it into an archive. This is particularly important for records that hold personal data as the UK GDPR states that personal data cannot be held for longer than it is required, for the performance of the task for which **it** was collected.

It is the responsibility of the department which creates or collects the information, to ensure that the retention periods are captured and/or updated on the retention schedule, to inform staff on how long it should be kept for. This must also include the required method for destruction at the end of its life cycle.

7. Guidance for the Destruction of Records.

When records held by Public Health Wales have reached the end of their life cycle, the process must be followed to ensure the safe archiving or destruction of such records. In the event it is deemed necessary to destroy records, appropriate information on the decision process must be recorded to complete that action.

Records with mandatory retention periods that have been destroyed also need to be recorded, as well as records that have local retention periods that have been deemed necessary for use by Public Health Wales. Further information can be found under [Article 5 of the UK GDPR](#)

Public Health Wales are obligated to ensure that it can demonstrate good practice of the above principles where personal data is stored. Data should not be held for longer than is necessary for the performance of the agreed task.

The organisation is required to ensure information is routinely destroyed in accordance with agreed retention periods. **Annex 2** contains a Record of Destruction which must be completed to document the destruction of records that have reached the end of their life cycle, or they have reached the time limit for which Public Health Wales are required to retain them for. It is the responsibility of the data owners to ensure this is completed.

8. Paper or Hard Copy Records

Paper or hard copy records are becoming increasingly less common within Public Health Wales as the organisation proceeds with digital records management solutions. Where appropriate, paper records should be:

- Scanned into SharePoint Online, with set naming conventions in set SharePoint document libraries, or to line manager's One Drive if they are staff related.
- Have assigned retention periods.
- Have assigned responsibility to appropriate members of staff
- Destroyed when they are no longer required for the performance of the task, or when they reach the end of the set retention period.
- A record of destruction kept when the record has reached the end of its life cycle.
- Have a clear, identified owner.

Where hard copy records require provisions of storage for an extended period, they should be held in an offsite storage facility.

Please contact PHWRecords.Management@wales.nhs.uk for details of the current facility.

Annexes

- Annex 1 [Retention and Destruction Schedule](#)
- Annex 2 [Record of Destruction Template](#)
- Annex 3 [Register of Repositories \(sharepoint.com\)](#)