Clinical Commissioning Group Governing Body
Paper Summary Sheet
Date of Meeting: 22 March 2016

For: PUBLIC session ☒   PRIVATE Session ☐

For: Decision ☒   Discussion ☐   Noting ☐

Agenda Item number and title:	GOV/16/03/15 Records Management Strategy
Author:	Susannah Long, Governance & Risk Manager
Lead Director/GP from CCG:	Simon Truelove, SIRO
Executive summary:	The requirement for a records management strategy is noted in the NHS Code of Practice for Records Management as the strategy provides a systematic and coordinated approach to records management arrangements within the organisation. The CCG has had a strategy in place for a year which has now been reviewed (amendments in green text). The Strategy sets out practical steps for NHS Wiltshire CCG to take to deliver improved compliance. The Strategy will support the CCG self-assessment against the Information Governance Toolkit (submission March 2016). The Audit and Assurance Committee does not have delegated authority to approve this strategy (reserved to the Governing Body) but, as the committee responsible for overseeing CCG Information Governance, is asked to note progress and **agree** the revised strategy.
Evidence in support of arguments:	The strategy is a requirement of the IG Toolkit and NHS Code of Practice for Records Management.
Who has been involved/contributed:	The strategy has been drafted in collaboration with the CSU and has been presented to and agreed by the CCG Information Governance Group.
Communications Issues:	The strategy should be treated as a public document and will be available for release under the FOI Act.

Financial Implications:	None
Review arrangements:	The strategy will be reviewed after one year.
Risk Management:	The strategy is a risk management control.
National Policy / Legislation:	The strategy supports the requirements of national policy and legislation, particularly the Data Protection Act 1998 and the Freedom of Information Act 2000.
Next Steps:	The Governing Body is asked to approve the Records Management Strategy.

Document information

Document type:	Strategy
Document reference:	
Document title:	**Records Management Strategy**
Document operational date:	October 2014
Document sponsor:	David Noyes / Simon Truelove
Document manager:	Susannah Long
Approving Committee/Group:	Governing Body
Approval date:	February 2016
Version:	1.3
Recommended review date:	January 2017
Internet location:	Information Governance

Please be aware that this printed version of this document may NOT be the latest version. Please refer to the internet for the latest version.

Review Log

Version	Review Date	Reviewed By	Changes Required? (If yes, please summarise)	Changes Approved By	Approval Date
1.0	27/01/16	RS, SCW CSU, IGG	Include CCG vision for records management; Addition of IAO/IAA role; Removal of records management Roadmap and Action Plan 14/15; Addition of 16/17 Strategy Plan.		

Acknowledgements

The CCG would like to acknowledge the support of the CSU in preparation of the draft Records Management Strategy.

RECORDS MANAGEMENT STRATEGY

1.0   INTRODUCTION & PURPOSE

1.1   This Records Management Strategy broadly articulates the practical steps that NHS Wiltshire CCG will take to deliver compliance with our records management policy and wider NHS records management requirements.

The requirement for a records management strategy is noted in the NHS Code of Practice for records management. It is also required evidence for the CCG's Information Governance Toolkit (requirement 13-420). The strategy provides supports the IG Toolkit by providing a systematic and coordinated approach to records management working alongside the Information Governance programme.

The action plan includes a number of fundamental records management activities.

To deliver records management across the CCG we are working with South, Central and West Commissioning Support Unit's (SCW CSU) Records Management function.

2.0   SCOPE

2.1   Records are defined as any form of information which has been created or gathered as a result of any aspect of our work. Records can be manual (paper) and, most commonly, electronic. Common examples include invoices, email correspondence, faxes, contracts, datasets, spreadsheets, note pads and even 'post-it' notes can all qualify as records.

The records included under this strategy include paper records held within Southgate House and in external archive storage which are the property of NHS Wiltshire CCG. The strategy also covers those records held electronically and managed by the South, Central & West CSU Information Technology Team (electronic archives, CCG folders), the CCG intranet and internet sites and any these records held by the SCW CSU while carrying out service lines for the CCG e.g. FOI on behalf of the CCG to carry out CCG contracted activities.

To deliver records management across the CCG we are working with Central Southern Commissioning Support Unit (CSU) Records Management function.

3.0   DETAILED STRATEGY

NHS Wiltshire CCG's vision for records management is:

> *"Our information is consistently filed and managed over time including governed and regular disposal. We are able to find information we need quickly, and have assurance as to its quality, reliability and currency."*

NHS Wiltshire CCG has the following high level aims for the CCG records management programme:

1) Implement systematic approaches to records keeping throughout the records lifecycle.

   The CCG will implement a records framework that includes policy, procedure, guidance, taxonomy and governed file shares that, together, create a holistic and systematic approach to record keeping.

   The CCG will explore technology solutions and configuration which will help improve records management and bring user benefits and efficiencies, including the monitoring of paper storage contracts.

2) Be compliant with NHS and other national record keeping requirements.

   The CCG will design the framework and auditing programme so that it meets the NHS records management code of practice and IG toolkit requirements and professional best practice.

3) Ensure that records governance, and roles and responsibilities are clear and effective.

   Governance, including what CCG staff will do is articulated in policy, Terms of Reference and through training modules. CCG Information Asset Owners and Information Asset Administrators have a key role to play in implementing the records management policy.

4) Ensure that staff and contractors are trained record keepers.

   Records management training is mandated and it is delivered through the Information Governance Training Tool online modules, Intranet pages, classroom presentations and short guidance material.

5) Ensure the disposal of CCG records is legally defensible, scheduled and systematic.

   The CCG records framework will include agreed disposal schedules and a disposal procedure that must be implemented for all information assets these are specifically linked to taxonomy and file share structures.

6) Improve the quality and accessibility of CCG records whilst maintaining their security.

The CCG's approach to filing and naming records will improve ~~go a long way to improving~~ information accessibility and provide assurance as to its quality. The CCG will analyse permission rights and restrictions to ensure records cannot be tampered with, stand as effective evidence and remain restricted as necessary. The CCG will work with Information Governance colleagues in the CSU to protect our information and use technology to provide solutions.

7) Monitor CCG performance against policy and seek to make improvements wherever possible.

Regular records management audits will be carried out across the business encouraging continuous improvement and embedding best practice
~~The CCG will have a records audit programme and corrective actions process to ensure non-compliance is fixed and continuous improvement encouraged~~.

4.0   ROLES & RESPONSIBILITIES

4.1   All CCG staff have a role to play in delivering this strategy.

4.2   The Senior Information Risk Officer (SIRO) will deliver and be accountable for effective control of information assets.

4.3   The Lead Director for Information Governance will oversee the information governance arrangements for the CCG of which records management is a part.

4.4   The Caldicott Guardian will support, promote and critically assess the record keeping arrangements for Person Confidential Data (PCD).

4.5   The CCG Lead manager for Information Governance will work with the CSU to implement the high level aims of this strategy.

4.6   Nominated Information Asset Owners (IAOs) and Information Asset Administrators (IAAs) will promote good record keeping practice within their teams and ensure policy and procedure is being implemented.

4.7   The CSU Records Manager will provide expert advice and knowledge to design, facilitate implementation and trouble shoot policies, procedures and arrangements to achieve the high level aims of this strategy.

5.0   EQUALITY, DIVERSITY AND MENTAL CAPACITY

5.1   An Equality Impact Assessment (EIA) has been completed for this strategy and no significant issues were identified. The EIA will be published on the CCG internet.

6.0   REVIEW

6.1   This document will be reviewed ~~after one~~ each year ~~initially~~ to assess progress.

7.0   STRATEGY PLAN

<table>
<tr><td colspan="5">Wiltshire CCG Records Management Strategy Plan 2016-2017
(revised a updated version of previous action plan)</td></tr>
<tr><td>Task</td><td>Actions</td><td>Owner</td><td>Target Date</td><td>Status (as of Jan 16)</td></tr>
<tr><td rowspan="5">Records Management Policy Framework approved</td><td>Policy</td><td>RS / SL</td><td>Q2 15/16</td><td>Completed</td></tr>
<tr><td>Procedures</td><td>RS / SL</td><td>Q3 15/16</td><td>Completed</td></tr>
<tr><td>Audit Methodology</td><td>RS / SL</td><td>Q4 15/16</td><td>Completed</td></tr>
<tr><td>Strategy Review</td><td>RS / SL</td><td>Q4 15/16</td><td>Completed</td></tr>
<tr><td>Review of policy and procedure framework</td><td>RS / SL</td><td>Q4 16/17</td><td>Pending</td></tr>
<tr><td>Policy Framework disseminated and published on Intranet</td><td>Framework is published on Intranet and communicated to all staff</td><td>RS / Comms</td><td>Q4 15/16</td><td>In progress</td></tr>
<tr><td rowspan="2">Roles & Responsibilities</td><td>Corporate level records management responsibilities allocated i.e. Records Manager and SIRO.</td><td>RS / SL</td><td>Q2 15/16</td><td>Completed – noted in policy.</td></tr>
<tr><td>IAOs and IAAs identified and Records Management responsibility defined</td><td>SL / RS / BT</td><td>Q4 15/16</td><td>Completed</td></tr>
<tr><td rowspan="2">What information do we hold?</td><td>2015/16 Information Asset Registers / DFMs reviewed by Records Manager</td><td>RS / BT</td><td>01/05/16</td><td>IAAs currently entering data</td></tr>
<tr><td>(subject to IAR review) Carry out WCCG file share survey and paper survey (if required).

Report to IGSG as necessary.</td><td>RS / SL</td><td>Q1 16/17</td><td>Pending</td></tr>
<tr><td rowspan="3">Information Disposal</td><td>Disposal Schedules Approved (included in procedures above)</td><td>RS / SL</td><td>Q3 15/16</td><td>Completed - Approved by IGG</td></tr>
<tr><td>Electronic Information Disposal Event/s: encourage teams to review file share data and delete; includes deletion of legacy data</td><td>RS / SL</td><td>Q2 16/17</td><td>Pending, may time with File Share rebuild</td></tr>
<tr><td>Paper information clear out day</td><td>RS / SL</td><td>Q1 16/17</td><td>Pending – Date to be confirmed</td></tr>
</table>

Wiltshire CCG Records Management Strategy Plan 2016-2017
(revised a updated version of previous action plan)

Task	Actions	Owner	Target Date	Status (as of Jan 16)
Information Storage / Systems	Offsite paper archive established and in use including Ongoing monitoring	RS / SL	Q1 16/17	Quotes from suppliers received
	HR folders review, refiling and new folders	RS / SL	Q4 15/16	Purchase Order received
	File Share Audit software in place	RS / CSU IT / IGSG	Q1 16/17	CSU Project manager scoping
	File Share Restructure	RS / IGSG	Q1/2 16/17	Early draft proposal completed
Compliance Auditing	Review IG Compliance audits as submitted IAA local audits as submitted	RS / BT	Q1 16/17	Audits being carried out by IAAs
	Carry out records management spot-check audits	RS	Q4 15/16, Q3-4 16/17	
Staff Training / Knowledge	General staff training sessions x 3	RS	2016/17	Sessions already provided to CHC 2015/16.
	IAO / IAA specific sessions	RS / SL	TBC	

NHS Wiltshire Clinical Commissioning Group

Equality Impact Analysis – the EIA form

Title of the paper or Scheme: **Records Management Strategy**

For the record	
Name of person leading this EIA Susannah Long, Governance & Risk Manager	Date completed 9 February 2016
Names of people involved in consideration of impact Robin Steward, Records Manager, CSU	
Name of director signing EIA David Noyes, Director of Planning, Performance and Corporate Services	Date signed 11 February 2016

What is the proposal? What outcomes/benefits are you hoping to achieve?
The Records Management Strategy has been drafted to detail the steps to be undertaken to improve arrangements for creating, storing, accessing, retaining and disposing of corporate records in accordance with legal requirements.
Who's it for?
Use by the staff within the organisation.
How will this proposal meet the equality duties?
Effective records management facilitates the creation of appropriate and correct information to be used for decision making purposes. This can assist with the identification of discrimination and also identify opportunities to shape service provision appropriately for the Wiltshire population.
What are the barriers to meeting this potential?
Appropriate training and leadership is needed to facilitate the sharing and protection of information including at disposal.
2 Who's using it Refer to equality groups
The Records Management Strategy will support all equality groups.
What data/evidence do you have about who is or could be affected (e.g. equality monitoring, customer feedback, current service use, national/regional/local trends)?
The CCG has data on staffing and demographic information.
How can you involve your customers in developing the proposal?
The CSU has been instrumental in the development/review of this strategy. No customer involvement has been included at this time.
Who is missing? Do you need to fill any gaps in your data? (pause EIA if necessary)
No gaps.
3 Impact Refer to dimensions of equality and equality groups
Show consideration of: age, disability, sex, transgender, marriage/civil partnership, maternity/pregnancy, race, religion/belief, sexual orientation and if appropriate: financial economic status, homelessness, political view
Using the information in parts 1 & 2 does the proposal:
a) Create an adverse impact which may affect some groups or individuals. Is it clear what this is? How can this be mitigated or justified?
There is no adverse impact.

What can be done to change this impact?
N/A
b) Create benefit for a particular group. Is it clear what this is? Can you maximise the benefits for other groups?
There is an equal benefit for all groups as good records management should improve productivity and transparency.
Does further consultation need to be done? How will assumptions made in this Analysis be tested?
No further consultation is needed at this time.

4 So what?	Link to business planning process
What changes have you made in the course of this EIA?	
None	
What will you do now and what will be included in future planning?	
The strategy will be implemented and will be monitored at the Information Governance Group.	
When will this be reviewed?	
The strategy will be reviewed after one year.	
How will success be measured?	
The Information Governance Group will monitor the effectiveness of the strategy by considering compliance with the IG Toolkit.	

EIA form V3 August 2013