

**Clinical Commissioning Group Governing Body
Paper Summary Sheet
Date of Meeting: 27 January 2015**

For: PUBLIC session PRIVATE Session

For: Decision Discussion Noting

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|---|---|
| Agenda Item and title: | GOV/15/01/13 Records Management Strategy |
| Author: | Susannah Long, Governance & Risk Manager |
| Lead Director/GP from CCG: | Simon Truelove, SIRO |
| Executive summary: | <p>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.</p> <p>The CCG Strategy sets out practical steps for NHS Wiltshire CCG to take to deliver improved compliance with the Records Management Policy. The Strategy will support the CCG self-assessment against the Information Governance Toolkit (submission March 2015).</p> <p>The Audit and Assurance Committee, as the committee responsible for overseeing CCG Information Governance, has agreed the strategy and presents the strategy to the Governing Body for approval.</p> |
| 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. The strategy has been considered and agreed by the Audit and Assurance Committee on 13 January 2015. |
| Cross Reference to Strategic Objectives: | The strategy contributes to all strategic objectives as it aims to improve governance of the CCG records. |
| Engagement and Involvement: | This is an internal document and has not received further engagement or involvement at this time. |

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|---|---|
| Communications Issues: | The strategy should be treated as a public document and will be available for release under the FOI Act. |
| Financial Implications: | There are no direct financial implications. |
| 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. |
| Equality & Diversity: | An Equality Impact Assessment has been carried out and no negative impact has been identified. |
| Other External Assessment: | The strategy will be submitted as evidence for the Information Governance Toolkit submission. |
| What specific action do you wish the Governing Body to take? | The Governing Body is asked to approve the 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: | January 2015 (TBC) |
| Version: | 0.4 |
| Recommended review date: | January 2016 |
| Internet location: | Information Governance |

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Review Log

| Version | Review Date | Reviewed By | Changes Required? (If yes, please summarise) | Changes Approved By | Approval Date |
|---------|-------------|-------------|---|---------------------|---------------|
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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 requirements.

The requirement for a records management strategy is noted in the NHS Code of Practice for records management. It also supports the IG Toolkit by providing a systematic and coordinated approach to records management.

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

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 CSU Information Technology Team (electronic archives, CCG folders), the CCG intranet and internet sites and these records held by the CSU 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 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 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.

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

Records management training is mandated and it is delivered through online modules, Intranet pages and short guidance material.

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

The CCG records framework will include agreed disposal schedules and a procedure; these are specifically linked to taxonomy and file share structures.

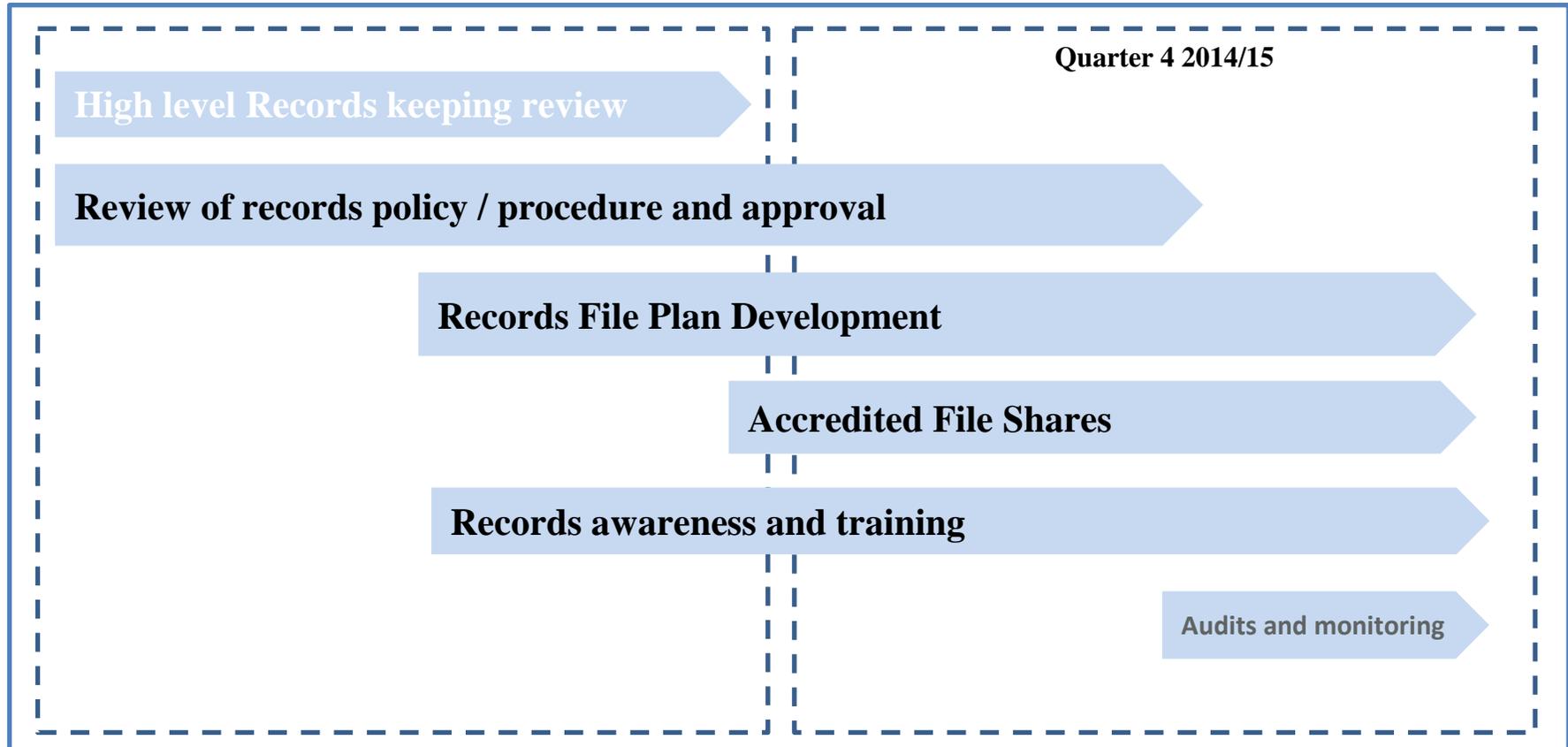
- 6) Improve the quality and accessibility of CCG records whilst maintaining their security.

The CCG approach to filing and naming records will go a long way to improving accessibility and assurance. 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.

The CCG will have a records audit programme and corrective actions process to ensure non-compliance is fixed and continuous improvement encouraged.

Records Management Roadmap



| NHS Wiltshire CCG Records Management Action Plan 2014/15 – Commencing Oct 2014 | | | | | | | | | | |
|---|---|---------------------------------|--|--|---------------------------------|---------------------|--------------|------------------------------------|------------------------------------|-------------|
| | | Q3 | | | Q4 | | | Q1 | | |
| Workstream | Description | OCT | NOV | DEC | JAN | FEB | March | April | May | June |
| CSU Liaison and monitoring | Formal, regular situation reports between CSU and Records Management contact at CCG | Meeting | | | Meeting | | | Meeting | | |
| Record keeping review | Standalone discovery exercise to establish level of records keeping practice across teams and specific issues. Will inform policy / procedures and schedule of work going forward. | | CSCCG to conduct audit and write report; Attempt to get file share metrics | | Revise action plan as necessary | | | | | |
| Policy and Procedure | Revise Records Management Policy (procedures) to ensure that CCG is compliant with NHS Records Management Code of Practice. Policy, naming /version control, emails, file shares, disposal etc. | | | Review and amend as necessary drawing from best practice and audit findings. Approve, publish and raise awareness. | | | | | | |
| Records File Plan / Taxonomy | Review CCG Records File Plan linking to disposal schedules | | | | | Survey and analysis | | 1 st draft of File Plan | 2 nd Draft of File Plan | Action |
| Electronic Records 'System' | Implement Accredited File Shares. Uses Records File Plan to create the folder structure. | CSU Developing; To be specified | | | | | | | | |
| Compliance Audits | Establish and carry out a records management compliance audit once key framework is in place. | | | | | | | Prepare method and schedule | | Start |
| Training & Awareness | Design training package in line with policy and procedure requirements. Keep CCG intranet site updated with links and summary policy and contacts. | | | Review training packages | Publish training modules | | | | | |

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 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 year initially to assess progress.

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 5 January 2015 |
| Names of people involved in consideration of impact Diana Hargreaves, Board Administrator | |
| Name of director signing EIA David Noyes, Director of Planning, Performance and Corporate Services | Date signed 6 January 2015 |

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 assisted with development 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 the response to Subject Access Requests and FOI requests.