



Tower Hamlets GP Care Group Records Management Policy

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Title	
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This policy will impact on	All staff
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Purpose of document

The Tower Hamlets GP Care Group provides clinical and administrative services as a separate organisation and also through its 37 constituent share holder GP Practices.

As an organisation providing clinical services the TH GP Care Group is required to keep: Adequate records of its attendance on and treatment of patients

and shall do so-

- i. on forms supplied to it for purpose by the CCG (or other commissioners);
- ii. or with the written consent of the CCG (or other commissioners) , by way of computerised records, or in a combination of those two ways

This specifically applies to medical records. However, the TH GP Care Group also holds other records.

The TH GP Care Group is dependent on its records to operate efficiently and account for its actions. This policy defines a structure for the TH GP Care Group to ensure adequate records are maintained, that records are managed and at best value, commensurate with legal, operational and information needs.

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1. Background

- 1.1 The TH GP Care Group records are essential to providing patient services, giving evidence of action and decisions and representing a vital asset to support our daily functions and operations. They support policy formation and managerial decision- making, protect the interests of the TH GP Care Group and the rights of the patient, staff and members of the public who have dealings with the TH GP Care Group. They support consistency, continuity, efficiency and productivity. They help us to deliver services in consistent and equitable ways.

1.2 Records management, through the proper control of the content, storage and volume of records, reduces vulnerability to legal challenge or financial loss and promotes best value in terms of human and space resources through greater coordination of information and storage systems.

1.3 All records will be kept in accordance with following statutory and NHS guidelines:

- Public records Acts 1958 and 1967
- Data Protection Act 1998
- Freedom of Information Act 2000
- HSC 1999/053 For the Record
- Controls Assurance records management standard, since 1999
- Caldicott Review: Information Governance in the health and care system, 2013
- Audit Commission, Setting and Record Straight, 1995
- CIC Regulations 2016

2. Scope

2.1 This policy relates to all records

Records are defined as information, created or received in the course of business, and captured in a readable form in any medium, providing evidence of the functions, activities and transactions.

They include:

- Administrative records (including personal, estate, financial and accounting records, contract records, litigation, company records and records associated with complaint-handling)
- Patient health records
- Staff records
- Records in all electronic formats

3. Objectives

The seven main objectives of this policy are:

3.1 Accountability - that adequate records are maintained to account fully and transparently for all actions and decisions in particular:

To protect legal and other rights to staff or those affected by those actions. To facilitate audit or examination

To provide credible and authoritative evidence

3.2 Quality – the records are complete and accurate and the information they contain is reliable and its authenticity can be guaranteed

3.3 Accessibility – that records and the information within them can be efficiently retrieved by those with a legitimate right of access, for as long as the records are held by the organisation or through valid information sharing agreements.

3.4 Security – that records will be secure from the unauthorised or inadvertent alteration or deletion, that access and disclosure will be properly controlled and audit trails will track all use and changes. Records will be held in a robust format which remains readable for as long as the records are required.

3.5 Retention and disposal – that there are consistent and documented retention and disposal procedures to include provision for permanent reservation of archival records.

3.6 Training – that all staff are made aware of their record-keeping responsibilities through generic and specific training programs and guidance.

3.7 Performance measurement – that the application of records management procedures are regularly monitored against agreed indicators and action taken to improve standards as necessary.

4. Implementation

This policy will be implemented by a series of programmes to include:

4.1 Records creation

- Creations of adequate records to document essential activities;
- Structured information (content management, version control) to facilitate shared systems based on functional requirements;
- Referencing and classification for effective retrieval of accurate information;
- Documented guidelines on creation and use of record systems

4.2 Records maintenance

- Assignment of responsibilities to protect records from loss or damage over time;
- Access controls to prevent unauthorised access or alterations of records;
- Defined security levels for access to electronic records and procedures to amend access authorisations as appropriate when staff move
- Tracking systems to control movement/audit use of records;
- Identification and safeguarding of key or vital records;
- Arrangements for business continuity;

4.3 Records disposal

- Systematic retention schedules and procedures for consistent and timely disposal;
- Central storage system for records requiring long-term retention to include electronic archiving system;
- Mechanisms for regular transfer of records designated to permanent preservation to appropriate archives

4.4 Training and guidance

- Inclusion of records managements functions in job processes where appropriate;
- Generic and specific guidance on record-keeping standards and procedures;
- Training programmes

5. Responsibilities

Records management responsibilities will be written into all accountable individuals' job descriptions and Work plans and clear procedures for retention of key records issued.

6. The Electronic Medical Record

6.1 EMIS

The Electronic Medical Record held on the EMIS Web System is the primary clinical record for the TH GP Care Group and its 37 constituent share holder GP Practices.

All patients' clinical contacts will be recorded and information received from hospitals, laboratories or other outside agencies will be scanned into patients Electronic Medical Record unless already received by electronic means.

Staff will be trained on its use in accordance with Caldicott guidelines.

6.2 Closure

When the TH GP Care Group is informed that the patient is no longer registered with the TH GP Care Group (or one of the 37 constituent share holder GP Practices) or has died, a patients Electronic Medical Records will be closed (marked "left TH GP Care Group " or "died") together with a reason and date of closure. The Electronic Medical Record will be transferred by GP2GP electronic means wherever possible. If this is not available the record will be printed, or burned to a CD including any letters and attachments and will be added to any paper medical records held by the service and transferred according to service requirements detailed below.

6.3 Disposal

The GP medical records described above on closure of a patients record will then be returned to NHS Shared Business Services, 3 Cam Road, Stratford, London E15 2SY, and a record made of the date returned. Records relating to Health Visiting clients will be scanned as pdf documents and transferred visa NHS net to NHS net email to:

- School Health once the child reaches 5 years old
- Child Health department if the child is moving out of Tower Hamlets before the age of 5 years old

6.4 Destruction

Any paper documentation scanned into patients Electronic Medical Records will be retained for 1 year and placed in one of the secure confidential waste bins for shredding

These will be collected and securely destroyed. Any document with patient identifiable information should also be sent for shredding once scanned into the patient record.

6.5 Retention

Patients Electronic Medical Records will be retained on the EMIS system in accordance with the Department of Health Records Management Code of Practice for Health and Social Care 2016 record retention schedule

7. Record Keeping as a Community Interest Company Limited by Shares

As a Community Interest Company, Limited by Shares, the TH GP Care Group is obliged under its statutory obligations to maintain and keep:

- Records about the Company
- Accounting Records

Details of such statutory obligations are found at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/303764/13-711-community-interest-companies-chapter-8-statutory-obligations.pdf

<https://www.gov.uk/running-a-limited-company/company-and-accounting-records>

Records would normally be expected to be kept for 6 years from the end of the last company financial year they relate to.