NHS Highland Records Management Plan

Version 03.0

DOCUMENT CONTROL SHEET:

Key Information:

Title:	NHS Highland Records Management Plan
Date Published/Issued:	19 December 2016
Date Effective From:	
Version/Issue Number:	V01.0
Document Type:	Action Plan
Document Status:	Live
Consultation:	
Scope of Document:	
Objective:	
Author:	Board Secretary
Owner:	Elaine Mead
Approver:	
Approved by and Date:	NHS Board 29 November 2016
Contact:	Ruth Daly
File Location:	H:\cmeec02\Public Records (Scotland) Act 2011

Revision History:

Version:	Date:	Summary of Changes:	Name:	Changes Marked
1	6/9/16	Informal comments from Keeper's Office		
2	18/11/16	Draft for Board approval		
3	19/12/16	Final Draft for submission to Keeper's office		

Approvals: This document requires the following signed approvals.

Name:	Signature:	Title:	Date:	Version
Elaine Mead		Chief Executive NHS Highland	December 2016	03.0

Distribution: This document has been distributed to

Name:	Title/Division:	Date of Issue:	Version
NHS Highland Board		18 December 2016	02.0

Review:

This plan will be reviewed every year (or sooner if new legislation, codes of practice or national standards are to be introduced).

Introduction

Records management is the systematic control of an organisation's records, throughout their life cycle, in order to meet operational business needs, statutory and fiscal requirements, and community expectations. Effective management of information allows fast, accurate and reliable access to records, ensuring the timely destruction of redundant information and the identification and protection of vital and historically important records. Effective records management involves efficient and systematic control of the creation, storage, retrieval, maintenance, use and disposal of records, including processes for capturing and maintaining evidence.

Systematic management of records allows organisations to:

- know what records they have, and locate them easily
- increase efficiency and effectiveness
- make savings in administration costs, both in staff time and storage
- support decision making
- be accountable
- achieve business objectives and targets
- provide continuity in the event of a disaster
- meet legislative and regulatory requirements
- protect the interests of employees, clients and stakeholders

The guiding principles of records management are to ensure that information is available when and where it is needed, in an organised and efficient manner, and in a well maintained environment.

The importance of good records management has been brought into sharp focus by the 2007 Historical Abuse Systemic Review of Residential Schools and Children's Homes in Scotland by Tom Shaw ('the Shaw Report'). The recommendations of the Shaw Report and the subsequent 2009 review by the Keeper of the Records of Scotland led to the Public Records (Scotland) Act 2011 ('PRSA') in March 2011.

The Act makes provision about the management of public records by named public authorities. Provisions include the preparation of a Records Management Plan ('RMP') setting out and evidencing proper arrangements for the management of the authority's public records, and its submission for agreement by the Keeper. Each Board's Health Records and Corporate Records Management Policies should provide further detail concerning standards for the management of records.

The PRSA defines a record as "Anything in which information is recorded in any form." A record can be recorded in computerised or manual form or in a mixture of both. Data can be held on a range of media, including text, sound, image, and/or paper. Increasingly records are being kept on electronic and document management systems. Records may include such things as hand-written notes; emails and correspondence; radiographs and other imaging

records; printouts from monitoring equipment; photographs; videos; and tape-recordings of telephone conversations.

Public Records (Scotland) Act 2011 – Records Management Plan

Under the Public Records (Scotland) Act 2011 Scottish public authorities must produce and submit a records management plan setting out proper arrangements for the management of the organisation's records to the Keeper of the Records of Scotland for his agreement under Section 1 of the Public Records (Scotland) Act 2011.

NHS Highland Records Management Plan (RMP) sets out the overarching framework for ensuring that NHS Highland records are managed and controlled effectively, and commensurate with the legal, operational and information needs of the organisation. The RMP considers all 14 elements as advised in the Keeper's Model RMP and supporting guidance material. The 14 elements are:

1. Senior management responsibility
2. Records manager responsibility
3. Records management policy statement
4. Business classification
5. Retention schedules
6. Destruction arrangements
7. Archiving and transfer arrangements
8. Information security
9. Data protection
10. Business continuity and vital records
11. Audit trail
12. Competency framework for records management staff
13. Assessment and review
14. Shared information

The RMP defines NHS Highland Action Plan for improving the quality, availability and effective use of records in NHS Highland and provides a strategic framework for all records management activities.

NHS Highland Records Management Plan is effective from 19 December 2016. This Plan is to be continuously reviewed and updated. Reports will be submitted quarterly to the Information Assurance Group and annually to the Senior Management Team.

Agreed by

Chief Executive, NHS Highland   **Date 19 December 2016**

Summary of Evidence

Evidence 1	1.1 Letter from Chief Executive covering elements 1, 2 and 3
Evidence 2	2.1 Board Secretary Job Description 2..2 Professional Lead for Health Records Job Description
Evidence 3	3.1 Scottish Government Records Management: NHS Code of Practice (Scotland). 3.2 NHSH Health and Social Care Records Management Policy. 3.3 Statutory and Mandatory Training Prospectus – Information Governance Courses (pp 51-52 refers) 3.3 Learn Pro Safe Information Handling Module 3.4 Information Security Policy 3.5 Audit Committee – Role and Remit and workplan 3.6 Information Assurance Group Remit. 3.7 Information Assurance Group Meeting Minutes June 2016 3.8 Information Governance Policy 3.9 Looking After Information Staff Leaflet 3.10 NHS Scotland Safe Practice For Using Email 3.11 NHS Scotland Information Governance Laptop Security 3.12 NHS Scotland Information Governance Out and About in Public 3.13 NHS Scotland Information Governance In Public Places 3.14 NHS Scotland Information Governance At Work 3.15 NHS Scotland Information Governance Out and About Work 3.16 Policy for the Management of Policies, Procedures, Guidelines and Protocols
Evidence 4	4.1 Draft Business Classification Scheme 4.2 Example of contract with another Health Care provider 4.3 Extract from Social Care contract 4.4 Health Records Inventory Form 4.5 Extract from Minutes of NHS Highland Senior Management Team of 22 September 2016 4.6 Extract from Draft Minutes of NHS Highland Board of 29 November 2016
Evidence 5	5.1 Scottish Government Records Management: NHS Code of Practice (Scotland). 5.2 Storage and Retention of Employee Data in Employee Files Policy 5.3 NHSH Health and Social Care Records Management Policy 5.4a RSS SLA 5.4b RSS Statement of Requirements 5.4c RSS Extract Showing Files Retained offsite. 5.5 NHSH Board and Committee Protocols 5.6 Highland Archive SLA
Evidence 6	6.1 NHS Highland Health and Social Care Records Management Policy 6.2 Extract From Dacoll Contract Re Hardware Disposal 6.3 Example of Dacoll Certificate Of Destruction 6.4 Dacoll Breakdown Report 6.5 Redacted RSS Certificate of Bulk Medical Record Destruction by method of shredding (Work Order) 6.6 Hardware Kit Disposal Procedure 6.7 SOP On The Culling of Medical Records 6.8 Northern Recycling: Collection, Transportation and Destruction of Confidential Waste Procedure 6.9 Northern Recycling Destruction certificate 6.10 Protocol for the Secure Archiving and Destruction of records 6.11 Draft NHSH Board and Committee Protocols

Evidence 7	7.1 Archive Arrangements & SLA with Highland Archive Centre 7.2 Extract showing files retained off site with RSS. 7.3 SLA With RSS for the storing of medical records offsite, in Livingston. 7.4 Statement of Requirements with RSS 7.5 The Collection, Transportation and Destruction of Confidential Material Procedure 7.5 Northern Recycling Certificate of Destruction

Evidence 8	8.1 NHS Scotland Security Policy and Standards
	8.2 Information Security Policy
	
	8.3 NHSH Policies:
	  a) Email Policy
	  b) Internet Policy
	  c) Password Change Policy
	  d) Mobile Data and Devices Policy
	  e) Information IT Security in Contracts With 3rd Parties Policy
	  f) Sharing Sensitive and Patient Identifiable Information by email Policy
	  g) Access To NHSH Network and Systems
	  h) Requests for Internet Activity Report Policy
	  i) Social Media Protocol
	
	8.4 Arrangement with Highland Council
	  a) ICT Acceptable Use Policy
	  b) Information Security Policy
	  c) Information Management Policy
	  d) ICT User Network Access Control Policy
	  e) Data Protection Policy
	
	8.5 Guide to the preparation and the sending of Procurator Fiscal requests
	8.6 NHS Highland Active Directory and NHS Mail protocol
	8.7 NHSS Information Risk Assessment template
	8. 8 Health Records Risk Assessment Template - Storage Areas

Evidence 9	9.1 NHSH Data Protection Registration Details (Link to Information Commissioner Website) 9.2 NHSH Information Governance Policy 9.3 NHS Confidentiality Code of Practice 9.4 NHS Code Of Practice On Protecting Patient Confidentiality 9.5 NHS Code Of Confidentiality Statement 9.6 Caldicott Guardian 9.7 Caldicott Approval Form: For Use Of Patient Identifiable Data 9.8 Screen shot of LearnPro – Safe Information Handling. 9.9 NHSH Policy Handling Requests For Access To Personal Health Records 9.10 How to see your Health Record Brochure 9.11 Form For Access To Medical Records 9.12 Fee Structure For Seeing Medical Records 9.13 SOP for Handling SARS 9.14 Fairwarning Information 9.15 Fairwarning FAQs
Evidence 10	10.1 Business Continuity Plan – Raigmore Hospital Central Records Department. 10.2 Internal Audit Report – Business Continuity Planning

Evidence 11	11.1 Fairwarning Information and FAQs 11.2 TRAK PMS Screenshots 11.3 Policy for the Management of Policies, Procedures, Guidelines and Protocols 11.4 File 360 Project Initiation Document 11.5 File 360 Project Mandate 11.6 File 360 Service Contract Order 11.7 NHS Highland Active Directory and NHS Mail protocol 11.8 Authorisation of Access to Clinical Applications
Evidence 12	12.1 NHS Scotland Information Governance Competency Framework 12.2 Learn Pro Information Governance Module 12.3 KSF Personal Development Planning and Review Information Pack 12.4 Education and Development Framework for Health Records Staff 12.5 Professional Lead for Health Records Job Description 12.6 Board Secretary's Job Description
Evidence 13	13.1 Internal Audit – Patients' Paper Records 2012 13.2 NHSH Clinical Governance Committee Remit 13.3 NHSH Information Assurance Group Remit 13.4 Waiting List Monthly sampling 13.5 Audit Committee Role and Remit
Evidence 14	14.1 Information Sharing Policy 14.2 Information Sharing Procedures 14.3 Information Sharing Guidance Leaflet 14.4 Information Sharing With Other NHS Boards 14.5 Highland Data Sharing Partnership Information Sharing Policy 14.6 Child Concern Form 14.7 Publication Scheme Model 14.8 Publication Scheme Model Guidance 14.9 Inter-agency Guidelines to Protect Young People Highland 14.10 Guide to the processing of Police Scotland Access requests

Element 1: Senior Management Responsibility			
Element Requirement:	**NHS Highland Statement:**	**Evidence:**	**Actions:**
Identify an individual at senior level who has overall strategic accountability for records management. This is a compulsory element under the terms of the Public Records (Scotland) Act: Section 1(2)(a)(i) It is required by the Act that an authority's records management plan (RMP), submitted for agreement with the Keeper, has the support of that authority's senior management team. It is therefore essential that the authority identifies a senior post-holder to take overall responsibility for records management. That person is unlikely to have a day-to-day role in implementing the RMP, although they are not prohibited from doing so. Further guidance about element 1 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement1.asp	The senior individual (board level) who has overall strategic responsibility for records management is Elaine Mead, Chief Executive, NHS Highland	Letter from Chief Executive, NHS Highland, supporting elements 1, 2 and 3 Evidence 1.1	No further action required

Element 2: Records Management Responsibility			
Element Requirement:	**NHS Highland Statement:**	**Evidence:**	**Actions:**
Identify individuals within the organisation, answerable to senior management, to have operational responsibility for records management within the organisation. This is a compulsory element under the terms of the Public Records (Scotland) Act 2011: Section 1(2)(a)(ii) The Keeper in agreeing an authority's RMP will wish to be assured that proper provision has been established for the day-to-day management of the authority's records. The Keeper will therefore require evidence to be submitted confirming the name and job title of the person or persons responsible for the day-to-day operation of the activities described in the authority's RMP. The Keeper will expect an authority to name an individual rather than simply a job title. Further guidance about element 2 – http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement2.asp	The post with overall responsibility for development and operation of records management is the Board Secretary, NHS Highland. Professional Lead for Health Records is Jamie Forrester, Health Records & Governance & Quality Manager. Professional Lead for Adult Social Care records is Ian Thomson, Lead Social Work Officer, North and West Operational Unit.	Contact Details: Ruth Daly Board Secretary NHS Highland Assynt House Beechwood Park Inverness IV2 3BW Telephone: 01463 704810 Email: ruth.daly@nhs.net Board Secretary Job Description Professional Lead for Health Records Job Description	No Further action required

Element 3: Records Management Policy Statement			
Element Requirement:	**NHS Highland Statement:**	**Evidence:**	**Actions:**
A records management policy statement underpins effective management of an authority's records and information. It demonstrates to employees and stakeholders that managing records is important to the authority and serves as a mandate for the activities of the records manager. This is a compulsory element under the terms of the Public Records (Scotland) Act 2011: Section 1 2(b)(i) It is important that an authority's records management plan (RMP), submitted for agreement with the Keeper, confirms that the authority has developed a records management policy governing the creation and management of authentic, reliable and useable records, capable of supporting business functions and activities for as long as they are required. Further guidance about element 3 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement3.asp	NHSH adheres to the code of practice, guidance and advice outlined in the Scottish Government Records Management: NHS Code of Practice (Scotland). NHSH policies and procedures outlined within this plan adhere to Scottish Government guidance. This document is the overarching policy statement which addresses the entirety of the authority's records – both clinical and corporate. NHSH has a number of policies and standards to underpin effective management of records. All NHSH staff are required to complete a mandatory Learnpro module relating to Information Handling. Staff receive a notification from Learnpro when this module has lapsed and requires review. All policy documents and guidance are available on the internal intranet site which can be easily accessed by all staff.	Scottish Government Records Management: NHS Code of Practice (Scotland) NHSH Health and Social Care Records Management Policy. Statutory and Mandatory Training Prospectus Information Governance Courses (pp 51 -52 refers). Learn Pro Safe Information Handling Module Information Security Policy Audit Committee – Remit, Membership and Work Plan Information Assurance Group Remit. Information Assurance Group Meeting Minutes June 2016 Information Governance Policy Looking After Information Staff Leaflet NHS Scotland Safe Practice For Using Email	On-going. Policies require regular review and update. All policies include details of policy status, dates of authorisation and date for review. NHS Highland is currently developing a document that details our roadmap to an electronic patient record system. NHS Highland recognises the need to introduce a way of regularly communicating these policies to staff and promoting best practice. It is intended for regular promotional and explanatory items addressing new and updated policies to be included in the staff newsletter "Highlights" and in "All User" emails.

		NHS Scotland Information Governance Laptop Security	
	NHSH has is a separate policy for heath records, adhering to the overarching NHSH policy. The Health and Social Records Management Policy was approved by the Information Assurance Committee.

All policies are located on the NHSH Intranet and advise staff on the author's contact if required. The policy creation, Authorisation and review dates are outlined on the document and are reviewed and updated on a regular basis or as legislation dictates. | NHS Scotland Information Governance Out and About in Public

NHS Scotland Information Governance In Public Places

NHS Scotland Information Governance At Work

NHS Scotland Information Governance Out and About Work

Policy for the Management of Policies, Procedures, Guidelines and Protocols | |

Element 4: Business Classification Scheme			
Element Requirement:	**NHS Highland Statement:**	**Evidence:**	**Actions:**
A business classification scheme describes the business activities the authority undertakes – whether alone or in partnership.

In line with the Keeper of the Records of Scotland's (The Keeper's) obligations under the Public Records (Scotland) Act 2011 (the Act) the following guidance is issued about an authority's Business Classification Scheme:

It is expected that an authority's Records Management Plan (RMP) submitted for agreement with the Keeper confirms that the authority has developed or is in the process of developing a business | NHS Highland has a draft Business Classification Scheme but it will require further action and implementation across the organisation.

NHSH recognises that work is required to standardise Corporate Business Classification schemes. It | NHS Highland has drafted a Business Classification Scheme based on departmental structures which is submitted as evidence.

Extract of minutes of Senior Management Team meeting of 22 September 2016. | On-going

NHS Highland recognises that further work will be required to develop and implement |

| classification scheme.

The term 'business classification' refers to a representation of an authority's functions and the records created pursuing those functions.

The purpose of this element is to demonstrate that the RMP takes account of the complete organisation and all its various business functions. This process will assist an authority in making good retention or disposal decisions under each of these business functions. To properly fulfil this element, an authority will need to demonstrate that its business classification scheme can be applied to the record management systems which it operates.

Further guidance about element 4 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement4.asp | outlines structure and business functions in each directorate, supports document management systems and provides guidance to staff.

Patients from NHS Highland may be sent to other NHS hospitals for healthcare. NHS Highland is satisfied these hospitals take records governance seriously and to the same standard as NHS Highland. They are scheduled public authorities and are therefore also bound by the requirements of the Public Records (Scotland) Act 2011.

Private care providers commissioned by NHS Highland are expected to keep appropriate records in line the Scottish Government Records Management Code of Practice (Scotland) Version 2.0 2010 | Extract of draft minutes of NHS Highland Board meeting of 29 November 2016.

Health Records Inventory form.

Example of a contract with other healthcare providers commissioned by NHS Highland to provide patient care – Golden Jubilee Hospital.

Example of Social Care Model Contract. | the Business Classification Scheme across NHS Highland. This has been noted by both the Senior Management Team and NHS Highland Board. We expect to progress this by July 2017. |
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Element 5: Retention Schedules			
Element Requirement:	**NHS Highland Statement:**	**Evidence:**	**Actions:**

A retention schedule is a list of records for which pre-determined disposal dates have been established. In line with the Keeper of the Records of Scotland's (The Keeper) obligations under the Public Records (Scotland) Act 2011 (the Act) the following guidance is issued regarding an authority's retention or disposal schedule. It is required by the Act that an authority's records management plan (RMP) submitted for agreement with the Keeper confirms that the authority has developed, or is in the process of developing, record retention and disposal schedules. Further guidance about element 5 – http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement5.asp	NHSH adheres to The Scottish Government NHS Records Management Code of Practice (Scotland) 2012 with regards to the retention of clinical and corporate documents. Our Personnel department has developed a policy outlining timescales for all components of staff employment records. The policy is based on the Scottish Government Records Management Code of Practice. Retention and destruction of clinical health records are detailed in NHSH Health and Social Care Records Management Policy. Offsite storage of records is managed by private contractor, RSS. An SLA details the storage requirements and the importance of security and confidentiality in accordance with NHSH policies on information security.	Scottish Government Records Management: NHS Code of Practice (Scotland). Personnel: Storage and Retention of Employee Data in Employee Files Policy NHSH Health and Social Care Records Management Policy. RSS SLA & Statement of Requirements RSS Extract Showing Files Retained offsite. RSS Retention Log Draft Board and Committee Protocols for records management. Highland Archive ongoing live SLA signed in 2014	On-going. Policies require regular review and update. NHSH plans to develop a record retention and disposal schedule for corporate records. We will publish it on the intranet and make staff aware of the new policies through the staff newsletter "Highlights" and "All Staff" emails. We expect to progress this by July 2017. Contract / Service Level Agreements associated with external retention of records require regular review, updating and renewal. NHS Highland is currently developing a document that details our roadmap to an electronic patient record system. We expect to progress this by July 2017. NHSH is currently developing Board and Committee Protocols outlining arrangements for the management of these records. We

			expect to progress this by July 2017.
	NHS Highland also has an SLA arrangement with the Highland Archive Service for the custody of historic records.		

Element 6: Destruction Arrangements			
Element Requirement	**NHS Highland Statement:**	**Evidence:**	**Actions:**
It is not always cost-effective or practical for an authority to securely destroy records in-house. Many authorities engage a contractor to destroy records and ensure the process is supervised and documented.

In line with the Keeper of the Records of Scotland's (The Keeper) obligations under the Public Records (Scotland) Act 2011 (the Act) the following guidance is issued regarding an authority's destruction arrangements:

It is vital that an authority's records management plan (RMP) submitted for agreement with the Keeper confirms that the authority has developed or is in the process of developing proper destruction arrangements.

Using a commercial disposal firm for the disposal of records other than electronic records is recommended because their practices will be controlled, audited, and fully compliant with current environmental regulations (their business can only exist if they are). They may be able to issue a certificate of destruction that should be maintained with the disposal schedule as proof that the record has been destroyed. In the context of both Data Protection and Freedom of Information legislation these sorts of procedures are the clear proof of controlled destruction of information that the Information Commissioner would be looking for in any disputed request which the institution was unable to answer.

Further guidance about element 6 – http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement6.asp | NHSH adheres to The Scottish Government NHS Records Management Code of Practice (Scotland) 2012 with regards to timeframes for the disposal of clinical and corporate documents.

Information outlining retention / destruction periods for a wide range of records held across the organisation is available to staff on the NHSH Intranet site, as is information relating to guidance on the disposal of confidential waste.

With regards to NHSH clinical health records, all details relating to the retention and destruction of files is outlined in our health care management plan which reflect national guidance for disposal of Confidential waste.

In accordance with NHS National Procurement, Northern Recycling destroys all confidential | NHSH Health and Social Care Records Management Policy

Extract From Dacoll Contract Re Hardware Disposal

Example of Dacoll Certificate Of Destruction for waste electrical and electronic equipment

Dacoll Breakdown Report for waste electrical and electronic equipment

RSS Certificate of Bulk Medical Record Destruction by method of shredding (Work Order)

Hardware Kit Disposal Procedure

SOP On The Culling of Medical Records

Northern Recycling: Collection, Transportation and Destruction of Confidential Waste Procedure for all records including corporate records. | NHS Highland recognises that a range of individual corporate record destruction policies have been created and plans to amalgamate these into a Standard Operating Procedure for destruction of paper corporate records. We will publish it on the intranet and make staff aware of the new policies through the staff newsletter "Highlights" and "All Staff" emails. We expect to be able to progress this by July 2017.

NHSH intends to review and update all policies and procedures. We expect to progress this by July 2017.

NHSH is currently developing a Board and Committee Servicing Protocol outlining arrangements for destruction. We expect to progress this by July |

	waste from localised NHSH sites. This covers corporate records and excludes medical records. NHSH has a policy outlining the procedure and process for disposing of computer hardware. We employ the services of a Dacoll to securely and safely dispose of hardware no longer required by the organisation and has been identified as requiring destruction. NHSH engages professional contractors to destroy records and ensure the process is supervised and documented. Details of the destruction process and the obligation of confidentiality and security placed on the contractor by NHSH is outlined in the Service Level Agreement we have with RSS. NHS Highland manages the destruction and disposal of e-records from shared drives but accepts this activity needs reinforcement.	Northern Recycling Destruction certificate for all records including corporate records. Protocol for the secure archiving and destruction of records - 2011.	2017. NHS Highland is working to address the gap around the destruction

| | | Draft Board and Committee Protocols for records management (evidence under section 5 refers). | and disposal of e-records and plans to update protocols and procedures to help staff know what is expected of them and publish this widely.

NHSH is currently developing Board and Committee Protocols outlining arrangements for the management of these records. We expect to progress this by July 2017. |
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Element 7: Archiving and Transfer Arrangements			
Element Requirement:	NHS Highland Statement:	Evidence:	Actions:
This is the mechanism by which an authority transfers records of enduring value to an appropriate archive repository, specifying the timing of transfers and other terms and conditions.

This is a compulsory element under the terms of the Public Records (Scotland) Act 2011 Section 1 2(b)(iii)

Obligations under the Public Records (Scotland) Act 2011 (the Act) the following guidance is issued regarding an authority's archiving policy and transfer arrangements.

A small proportion of records created by a public authority will be earmarked for permanent retention. These records will normally be removed from operational systems and transferred to an archive. This applies to records in all formats, although the procedure for transfer will vary (for example electronic records allow for records to remain 'live' until the successful transfer of the archive copy has been confirmed). | Clinical and corporate records identified as requiring permanent preservation, have been moved offsite and are managed by the Highland Archive Centre. This was agreed under a Service Level Agreement negotiated by NHSH Finance Department. This SLA is reviewed on a yearly basis.

Semi current or non active records Clinical Health Records are archived in a secure offsite storage in Livingston managed by | Archive Arrangements & SLA with Highland Archive Centre including receipts from Archivists and details of deposits made and paper catalogue.

Extract of Files Stored with RSS offsite.

SLA With RSS for the storing of medical records offsite, in Livingston.

Statement of Requirements with RSS

The Collection, Transportation and | NHS Highland recognises the need for a plan to establish a secure process for archiving paper corporate records of enduring value. We aim to have created a policy instructing staff on the procedure to archive records indentified for permanent preservation. |

| It is a fundamental part of a records management plan that procedures for facilitating such transfers are in place and are followed.

Further guidance about element 7-
http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement7.asp | RSS through a Service Level Agreement. Any records selected for preservation at the end of their lifecycle should be sent to the Highland Archive Centre.

Historic corporate records indentified for permanent preservation have moved to the Highland Archive Centre. | Destruction of Confidential Material Procedure

Northern Recycling Certificate of Destruction | |

Element 8: Information Security			
Element Requirement:	**NHS Highland Statement:**	**Evidence:**	**Actions:**
Information security is the process by which an authority protects its records and ensures they remain available It also maintains privacy where appropriate and provides for the integrity of the records. This is a compulsory element under the terms of the Public Records (Scotland) Act 2011 Section 1 2(b)(ii) In line with the Keeper of the Records of Scotland's (The Keeper) obligations under the Public Records (Scotland) Act 2011 (the Act) the following guidance is issued regarding an authority's information security code: In the course of their business it is likely that public authorities will create records containing sensitive information about people, or details of business transactions, that the authority may wish to protect from general consultation. Similarly, it may create records that hold information which should not be amended or deleted without appropriate authority. In both these cases an information security code should advise staff. As part of a full RMP the Keeper would expect to see that such a code exists and is generally available to staff involved in the creation of records.	NHSH Information Security Policy is available for all staff on the Intranet for common use. Each member of staff has to read the policy during induction to employment. All supporting Information Governance policies and guidance documents are available on the NHSH intranet. In March 2012, NHSH took on responsibilities for Adult Social Care – this meant that 1900 staff transferred from Highland Council to NHS Highland. The ex Highland Council Staff's IT	NHS Scotland Security Policy and Standards Information Security Policy NHS Highland security policies include: • e-mail Policy • Internet Policy • Password Changes • Mobile data & devices • Information IT Security in contracts with 3rd Parties • Sharing sensitive and patient identifiable information by e-mail • Access to NHS Highland network & systems • Requests for Internet Reports	Existing policies require regular review and update.

Further guidance about element 8 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement8.asp	equipment, systems and support are managed through a contract with a 3rd Party – Fujitsu.	• Social Media Protocol The policies relating to ex Highland Council Staff using Fujitsu equipment: • ICT Acceptable Use Policy • Information Security Policy • Information Management Policy • ICT User Network Access Control Policy • Data Protection Policy Guide to the preparation and the sending of Procurator Fiscal requests NHS Highland Active Directory and NHS Mail protocol NHSS Information Risk Assessment template Health Records Risk Assessment Template - Storage Areas	

Element 9: Data Protection			
Element Requirement:	**NHS Highland Statement:**	**Evidence:**	**Actions:**
Information security is the process by which an authority protects its records and ensures they remain available It also maintains privacy where appropriate and provides for the integrity of the records. This is a compulsory element under the terms of the Public Records	NHSH is registered under the Data Protection Act 1998. NHS Highland Data Protection Policy fully reflects the Data Protection Act	NHSH Data Protection Registration Details NHSH Information Governance Policy	Existing policies require regular review and update.

(Scotland) Act 2011 Section 1 2(b)(ii) In line with the Keeper of the Records of Scotland's (The Keeper) obligations under the Public Records (Scotland) Act 2011 (the Act) the following guidance is issued regarding an authority's information security code: In the course of their business it is likely that public authorities will create records containing sensitive information about people, or details of business transactions, that the authority may wish to protect from general consultation. Similarly, it may create records that hold information which should not be amended or deleted without appropriate authority. In both these cases an information security code should advise staff. As part of a full RMP the Keeper would expect to see that such a code exists and is generally available to staff involved in the creation of records. As evidence he will also want to view the authority's code. Further guidance about element 9 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement9.asp	1998. The policy which outlines details about the handling of personal information about individuals and the legal obligations to protect that information was formally approved and signed off by the Director of Public Health and Health Policy as before. NHSH uses the nationally procured software application, Fairwarning. All staff must read and sign the NHSH Code of Confidentiality on appointment to NHSH. All staff must complete the Learn Pro relating to Information Governance which includes modules relating to IT security, Data Protection and Confidentiality and Records Management	NHS Confidentiality Code of Practice NHSH Code Of Confidentiality Statement NHS Code Of Practice On Protecting Patient Confidentiality Caldicott Guardian Principles Caldicott Approval Form: For Use Of Patient Identifiable Data Screen shot of LearnPro – Safe Information Handling NHSH Policy Handling Requests For Access To Personal Health Records How to see your Health Record Brochure Form For Access To Medical Records Fee Structure For Seeing Medical Records SOP for Handling SARs Fairwarning Information and FAQs

Element 10: Business Continuity and Vital Records			
Element Requirement:	**NHS Highland Statement:**	**Corporate Evidence:**	**Actions:**
A business continuity and vital records plan serves as the main resource for the preparation for, response to, and recovery from, an emergency that might affect any number of crucial functions in an authority. In line with the Keeper of the Records of Scotland's (The Keeper) obligations under the Public Records (Scotland) Act 2011 (the Act) the following guidance is issued to support authorities with regard to business continuity and vital records. It is recommended that public authorities have a business continuity plan and that they can identify key records that facilitate the operation of the authority. This applies whether the records kept are paper based, electronic or, most likely, a hybrid of the two. Further guidance about element 10 – http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement10.asp	All records and data stored on NHSH networks are subject to regular backup and recovery procedures. In the event of eHealth systems failure, NHS Highland employs a Disaster Recovery Plan which outlines procedures for both clinical and corporate records. NHSH has business continuity arrangements in place for all clinical and corporate records which outlines recovery and continuity plans. A Learn Pro module regarding Business Continuity Management is available to all staff.	NHSH Disaster Recovery Plan which addresses clinical and corporate records. Business Continuity Plan – Raigmore Hospital Central Records Department. This will be rolled out to all record sites in the near future. Learn Pro Business Continuity Management Module Screen Shot (evidence under section 5 refers). Internal Audit Report – Business Continuity Planning 2013	Existing policies require regular review and update. We expect to progress this by July 2017. Health Records are currently reviewing their Business Continuity Plan, once ratified by the Clinical Support Divisional General Manager; this will be rolled out to all sites. NHSH is currently drafting a real time recovery business continuity plan which should be drafted and rolled out by <mark>end July 2017.</mark>

Element 11: Audit Trail			
Element Requirement:	**NHS Highland Statement:**	**Corporate Evidence:**	**Actions:**

An audit trail is a sequence of steps documenting the movement and/or editing of a record resulting from activities by individuals, systems or other entities.

In line with the Keeper of the Records of Scotland's (The Keeper) obligations under the Public Records (Scotland) Act 2011 (the Act) the following guidance is issued regarding audit trails:

It is considered good practice that the whereabouts of records should
be known at all times and movement of files around an electronic system or between physical storage areas or office areas should be logged.

Records held on physical media, such as paper or microform, should be subject to an authority's registry system recording the movement of records around the organisation.

For all records, in whatever format, a mechanism that monitors their movement and changes to content helps authorities ensure their authenticity and supports legal admissibility.

Further guidance about element 11 –
http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement11.asp | NHSH uses the nationally procured software application, Fairwarning. The software monitors specific IT systems for potential privacy breaches. The software collects demographics opposed to identifiable patient information. Access to Fairwarning is limited to a small team of people.

The electronic Patient Administration system, TRAK, is used to track patient's paper records and is updated by medical staff when transferring medical files.

NHS Highland is currently in the process of implementing new software, File 360, for monitoring some Corporate Records.

An enterprise-wide document management system is being considered as part of an NHS Highland office consolidation project. | Fairwarning Information and FAQs

TRAK/PMS Screenshots

Policy for the Management of Policies, Procedures, Guidelines and Protocols (outlines our version control policy)

FILE360 Project Initiation Document
File 360 Project Mandate
File 360 Service Contract order 2016-17

NHS Highland Active Directory and NHS Mail protocol.

Authorisation of Access to Clinical Applications

Extract of draft Minute of meeting of NHS Highland 29 November 2016 | Ongoing updates to existing policies which have expired or are close to expiry.   We expect to progress this by July 2017. |

Element 12: Competency Framework for Records Management Staff			
Element Requirement:	**NHS Highland Statement:**	**Corporate Evidence:**	**Actions:**
A competency framework lists the core competencies and the key	NHSH provides appropriate	NHS Scotland Information	Training for those

knowledge and skills required by a records manager. It can be used as a basis for developing job specifications, identifying training needs, and assessing performance. In line with the Keeper of the Records of Scotland's (The Keeper) obligations under the Public Records (Scotland) Act 2011 (the Act) the following guidance is issued regarding the skills required by an authority's records manager: As part of a robust plan, the Keeper would expect to see that the individual(s) responsible for the implementation and operation of the overall RMP has the relevant skills and training to carry out the task to a reasonable standard. He will welcome proof that a public authority recognises that records management is a separate function from general office duties and will require specific resources applied in the form of training. Read further explanation and guidance about element 12 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement12.asp	training and development to ensure all staff are aware of the records management responsibilities. We have recently updated our education framework for health records staff to reflect the importance of education and professional development. We are hoping to standardise this framework and roll it out to all relevant sites in 2017. At present all staff in Argyll & Bute working directly with medical records, currently undertake the IHRIM Certificate of Technical Competency, the details of which are outlined in the education framework. We plan for all staff working with health records to undertake this course in the next financial year. The Information Governance Learnpro module is mandatory for NHSH staff working directly with patient records. NHS Highland has recently re-established an Area Medical Records Committee along with associated subgroups to	Governance Competency Framework. Learn Pro Information Governance Module KSF Personal Development Planning and Review Information Pack Education and Development Framework for Health Records Staff Professional Lead for Health Records Job Description Board Secretary Job Description	identified with day to day responsibility for implementing the provisions of the plan and for the named individuals with records management responsibility to be assessed and updated. We aim to create an education framework for all staff working with corporate records using the NHS Scotland Information Governance Competency Framework. We hope to have this agreed by the Information Assurance Group and rolled out to all sites by December 2017.

	ensure that there is a consistent approach to records management across the organisation (this will include Adult Social Care). Staff working directly with patient records must meet the standards outlined in the job descriptions and the KSF dimensions.		

Element 13: Assessment and Review			
Element Requirement:	**NHS Highland Statement:**	**Evidence:**	**Actions:**
Regular assessment and review of records management systems will give an authority a clear statement of the extent that its records management practices conform to the Records Management Plan as submitted and agreed by the Keeper. The Keeper considers that it is a fundamental part of a records management plan (RMP) that it is reviewed: • Shortly after implementation to determine whether it is operating as expected. • On a regular basis thereafter to check that it still appropriate to the business needs of the organisation and has properly responded to the changes in circumstance that occur over time. Read further explanation and guidance about element 13 – http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement13.asp	The Board Secretary's role is to monitor, support implementation and continual assessment and review of NHSH's Records Management Plan. The Board Secretary intends to review the Plan quarterly in consultation with our Professional Lead for Health Records and our Professional Lead for adult social care records. Furthermore, we will submit parts of the RMP to internal audit at six month intervals. The Information Assurance Group reports to the Clinical Governance Committee ensure continual assessment and	Internal Audit – Health Records 2012 NHSH Clinical Governance Committee Remit NHSH Information Assurance Group Remit Waiting List Monthly sampling Audit Committee Role and Remit	Annual monitoring of 3rd Party Contracts, such as SLAs and contracts with external companies, such as, RSS. Health Records intend to review departmental policies annually, initially, due to the pending changes to national guidance and the adoption of the EU Data Protection regulations. Procedures will be reviewed periodically and continually for best practice and in line with continual improvement models, such as, kaizen.

	review of elements within the Plan. The RMP will be submitted to the Information Assurance Group every six months. This will allow the group to record the Board Secretary's review and the Group can support or propose changes to the plan. NHS Highland has recently re-established an Area Medical Records Committee along with associated subgroups to ensure that there is a consistent approach to records management across the organisation (this will include Adults Social Care).		Internal Audit of Health Records scheduled for Autumn 2016.

Element 14: Shared Information			
Element Requirement:	NHS Highland Statement:	Evidence:	Actions:

Under certain conditions, information given in confidence may be shared. Most commonly this relates to personal information, but it can also happen with confidential corporate records. The Keeper of the Records of Scotland (The Keeper) has issued the following statement about information sharing in line with his obligations under the Public Records (Scotland) Act 2011 (the Act): Information has been shared between public authorities for a number of years for the benefit of clients and stakeholders, but also in the interests of efficient public services. Sharing relevant information leads to benefits for service users in improved and more joined-up services. Scottish Government positively encourages information sharing across the public sector when it benefits society in general, but particularly when it is necessary to protect vulnerable adults or children. If your authority is not currently sharing information then it is very likely that you will be doing this in the future. An authority's RMP must indicate what safeguards are in place to ensure that information will be shared lawfully and securely. It will for example include reference to Information Sharing Protocols (ISPs). Policy documents, protocols, agreements and other information sharing documentation should be submitted as evidence that this aspect of records management is being handled appropriately. Read further explanation and guidance about element 14 - http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement14.asp	NHSH Information sharing protocols act as high level statements of principles on sharing and associated issues, and provide general guidance to staff on sharing information or disclosing information to another party. Information regarding NHSH policy on information sharing can be found on the intranet. Protocols and policies are reviewed and updated regularly.	Information Sharing Policy Information Sharing Procedures Information Sharing Guidance Leaflet Information Sharing With Other NHS Boards Highland Data Sharing Partnership Information Sharing Policy Child Concern Form Publication Scheme Publication Scheme Model Guidance Inter-agency Guidelines to Protect Young People Highland Information Sharing With Police SOP	Data sharing protocols are subject to ongoing review and update.