

Corporate policy

Records Management Policy

Issue sheet

Document reference	NHSBSARM001
Document location	S:\BSA\IGMMManaging IG\Developing Policy and Strategy\Develop or Review RM Policy\Current and Final
Title	NHS Business Services Authority Records Management Policy
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Issued to	All BSA staff on hub, published publicly on website
Reason issued	For information / action
Last reviewed	December 2020
Review cycle	Annual
Date of Equality Assessment	N/A
Date of Fraud Review	N/A

Revision details

Version	Date	Amended by	Approved by	Details of amendments
Initial Release	4.09.2007	-	IGSG	In 4.4 add " <i>implemented (which includes providing effective training)</i> " between " <i>co-ordinated</i> " and " <i>monitored</i> ". Add to the end of the sentence in 8.3 the following " <i>, who will review the results and take appropriate remedial action</i> ".
2.0	02.02.2011	Rachel Hardiman	IGSG	<ul style="list-style-type: none"> Sections 1.5 and 1.6: minor amendments for clarity. Section 1.7 expanded to show other documents related to or governed by the Policy. Sections 2.1 and 2.2: minor amendments for clarity. Section 2.3 on records lifecycle deleted, since RM at the BSA is based on the Continuum model. Old Sections 2.4 and 2.5

				<p>renumbered 2.3 and 2.4. 2.3 (old 2.4) expanded to refer to responsibilities under Public Records Act.</p> <ul style="list-style-type: none"> • Section 3.1: expanded for clarity. Bullet point on Security amended to refer to Business Recovery plans. • Section 4.4: amended for name change (IGM to HoIG) and to clarify oversight competencies. Section 4.6: expanded to lay out staff responsibilities in more detail. • Section 5.1: minor amendments to include further relevant legislation. New Section 5.2 to relate Policy compliance to the tools, guidance, and frameworks in Section 1.7. • Section 6.1: minor amendment for clarity. • Sections 7.1 and 7.2: minor amendments for clarity. New Section 7.3 on framework for updating retention schedule. • Section 8.1: minor amendment for clarity.
3.0	10.03.2014	C Dunn & C Gooday	RMF	Amended to reflect PCI DSS Compliance
4.0	31.03.2015	C Gooday	RMF	Added Public Sector Pension Act to 5.1
5.0	21.03.2016	C Gooday	RMF	Annual Review
6.0	17.11.2017	C Gooday	RMF	Update to reflect GDPR obligations and restructured to meet requirements of ISMS
7.0	08.12.2020	C Gooday	APRF	restructured to meet revised requirements of ISMS (approval pending)

1. Policy Summary

- 1.1. This policy sets out the principles applicable for the effective management and use of information, recognising its value and importance as a resource for delivering NHSBSA objectives.

2. Introduction

- 2.1. The NHS Business Services Authority (NHSBSA)'s records are its corporate memory, providing evidence of actions and decisions and representing a vital asset to support daily functions and operations. Records support policy formation and managerial decision-making, protect the interests of the NHSBSA and the rights of patients, staff and members of the public. They support consistency, continuity, efficiency and productivity and help deliver services in consistent and equitable ways
- 2.2. The NHSBSA has a legal obligation to comply with all appropriate legislation in respect of managing records. It also has a duty to comply with guidance and codes of practice issued by NHS England, NHS Digital, other advisory groups to the NHS and guidance issued by professional bodies .

3. Scope

- 3.1. This policy applies to all employees, Non-executive Directors, contractors, agents, representatives and temporary staff working for or on behalf of the NHSBSA. These will be referred to as Staff in the remainder of this policy.
- 3.2. The policy applies to all aspects of records whether internally or externally generated and in any format or media type, and all actions relating to those records including:
 - record creation;
 - record keeping;
 - record maintenance (including tracking of record movements and amendments to records);
 - access and disclosure;
 - closure and transfer;
 - appraisal;
 - archiving; and
 - disposal

4. Objectives

- 4.1. The objectives of this policy are:
 - To assist compliance with the General Data Protection Regulation EU 2016/679 (GDPR) and information access legislation such as the Freedom of Information Act

2000, Data Protection legislation, Environmental Information Regulations and applicable NHS Standards and/or other legal enactments or powers requiring the disclosure of records.

- To ensure the better use of physical and electronic records storage.
- Enable the better use of staff time.
- Provide improved control of valuable information resources.
- Ensure awareness and understanding of the NHSBSA history, in particular, changes in procedures and the reasons for them.

5. Key outcomes (or Expected Results)

- 5.1. Records will be kept no longer than necessary to meet business and legislative requirements and data protection principles.
- 5.2. NHSBSA will respect the information rights of customers and staff and thereby maintain a good reputation with customers, staff and stakeholders regarding its processing of large volumes of personal information.
- 5.3. NHSBSA will avoid regulatory enforcement action, together with the associated complaints, negative publicity, reputational damage, the cost of changing work practices and possible fines and compensation claims.
- 5.4. NHSBSA will be able to make use of information records in a timely manner to ensure business research and operational information needs are met.

6. Principles

- 6.1. NHSBSA aims to be open and transparent when processing and using personal and sensitive data by ensuring we follow the Data Protection Principles of good data handling as described in Article 5 of the GDPR:
 - All of the NHSBSA's records are retained for a minimum period of time for legal, operational and safety reasons. The length of time for retaining records will depend on the type and context of record and its purpose and/or importance to the NHSBSA's business functions.
 - Records which contain identifiable personal data will be kept no longer than necessary for the authorised business purposes. This will ensure the Storage limitation principle of the General Data Protection Regulation (GDPR) is met.
- 6.2. A Records Retention Schedule will be maintained to record business decisions of how long records will be retained and confirm when records will be disposed of. This will be made available to staff and the public.

6.3. The Records Management System will be managed in accordance with the Records Management Standard.

6.4. The security of records will be governed by the Information Security Policy.

6.5. The NHSBSA will annually audit its records management and recordkeeping practices to ensure compliance with Payment Card Industry Data Security Standard (PCI DSS) where it is required, and the National Data Guardian's data security standards.

7. Related policies

7.1. This policy follows:

- Information Security Policy
- Data Protection and Confidentiality Policy

The NHSBSA strategy, policy, and guidance documents governed by or related to this policy are:

- NHSBSARM002 Records management strategy
- NHSBSARM012 Corporate records retention schedule
- NHSBSARM015 Corporate records management guidance

8. Penalties

8.1. Any Staff who violate this policy will be subject to disciplinary action up to and including dismissal and/or criminal prosecution.