



# **NHS LOTHIAN RECORDS MANAGEMENT PLAN**

**For Developing Records Management  
Arrangements under Section 1 of The Public  
Records (Scotland) Act 2011**

## Document control sheet:

### NHS Lothian Records Management Plan

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## **Introduction**

### **About NHS Lothian**

NHS Lothian provides a comprehensive range of primary, community-based and acute hospital services for the populations of Edinburgh, Midlothian, East Lothian and West Lothian.

NHS Lothian provides services for the second largest residential population in Scotland - circa 850,000 people. It employs approximately 24,000 staff.

At NHS Lothian we believe that working together across all areas of the health service is the best way to provide care for patients. Through an innovative programme of modernisation, we are developing into a single integrated health system.

### **Public Records (Scotland) Act 2011 – Records Management Plan**

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 Public Records (Scotland) Act 2011 came fully into force in January 2013. The Act obliges all public authorities to prepare and implement a Records Management Plan (RMP). The NHS Lothian RMP will set out proper arrangements for the management of the organisations records, both corporate and clinical. The plan will be agreed by the Keeper of the Records of Scotland for his agreement under Section 1 of the Public Records (Scotland) Act 2011 and reviewed by NHS Lothian annually. The NHS Lothian RMP is wholly based on the model plan published in support of the Act by the Keeper of Records of Scotland.

The Keeper of Records of Scotland has provided a Model Records Management Plan and supporting guidance material. There are 14 elements of the plan that have to be met. These are listed below:

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 Act makes provision about the management of public records by named public authorities. Provisions include the preparation of a Records Management Plan (RMP) which must set out and evidence proper arrangements for the management of the authority's public records, and its submission for agreement by the Keeper. Each individual organisation Records Management Policies should provide further detail concerning standards for the management of records.

The NHS Lothian RMP provides a strategic framework for all records management activities.

The records management practices evidenced in this RMP and subsequent action plan are essentially a matter of good business administration. Information required for any purpose will only be as good as the quality of the records from which it is taken. If reliable records are not created in the first place, if they cannot be found when needed, or if the arrangements for their eventual archiving or destruction are inadequate, then information may not be adequate or even available for any purpose.

### ***Records Management***

***'The systematic control, organisation, access to and production of an organisation's information, whether it be on tape, disk, paper or film, from its creation through its use, to its permanent retention or legal destruction.'* (The Records Management Society)**

#### **What does records management cover?**

Records management covers records of all formats and media. This includes paper and computer records; cassette, video and CD records. Records management is needed throughout the lifecycle of a record, and the process begins when the decision to create the record is taken.

#### **Why are records important?**

Records are vital for the day-to-day functioning of NHS Lothian: they support the decision-making; document its aims, policies and activities; and ensure that legal, administrative and audit requirements are met.

#### **Why is records management important?**

For records to perform their various functions, some form of management is needed. Management includes control over what is created, the development of effective and efficient filing systems to store the records, and procedures for the retention of those records.

**NHS Lothian records management principles:**

- **Security** – that records will be secure from unauthorised or inadvertent alteration or erasure, 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 records are required
- **Accountability** – that adequate records are maintained to account fully and transparently for all actions and decisions in particular:  
To protect legal and other rights of staff or those affected by those actions  
To facilitate audit or examination  
To provide credible and authoritative evidence
- **Quality** – that records are complete and accurate and the information they contain is reliable and its authenticity can be guaranteed
- **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
- **Retention and disposal** – that there are consistent and documented retention and disposal procedures, including provision for permanent preservation of archival records (see attached Retention & Destruction Schedule).
- **Training** – that all staff are informed of their record-keeping responsibilities through appropriate training and guidance (as made available by NHS Lothian), and if required further support as necessary.

**For more information regarding the Act see:**

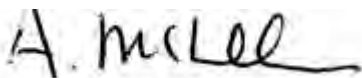
<http://www.nas.gov.uk/recordKeeping/publicRecordsActIntroduction.asp>

**For statutory requirements placed on the Keeper, including the preparation of the Model Plan see:**

<http://www.scottish.parliament.uk/parliamentarybusiness/Bills/22476.aspx>

The NHS Lothian Records Management Plan (RMP) is effective from 29 April 2016. The plan will be continuously reviewed and updated. Reports will be submitted annually to the Healthcare Governance Committee.

**Agreed by**



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**Professor Alex McMahon  
Director of Strategic Planning  
NHS Lothian  
29 April 2016**

## Element 1: Senior Management Responsibility

RMP Element 1 Description	NHS Lothian Statement	Evidence	Action Plan
<p>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)</p> <p>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.</p> <p>Further guidance about element 1 - <a href="http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement1.asp">http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement1.asp</a></p>	<p>Professor Alex McMahon, NHS Lothian's Director of Strategic Planning has senior responsibility for Records Management within the organisation and is the corporate owner NHS Lothian's Records Management Plan.</p> <p>Professor Alex McMahon is also chair of the NHS Lothian Strategic Public Records Programme Management Group.</p> <p>Professor Alex McMahon Interim Nurse Director and Director of Strategic Planning, REAS and Prison Services NHS Lothian Waverley Gate 2-4 Waterloo Place Edinburgh EH1 3EG <a href="mailto:alex.mcmahon@nhslothian.scot.nhs.uk">alex.mcmahon@nhslothian.scot.nhs.uk</a></p>	<p><b>E01-01</b> June 2013 Joint Management Team paper indicating agreement Director of Strategic Planning, Performance Reporting is the Director with Senior Manager with accountability for records management</p> <p><b>E01-02 December 2015</b> Corporate Management Team paper seeking support to submit draft plan to the Keeper for informal review and feedback.</p> <p><b>E01-03</b> Sample minute of NHS Lothian Strategic Public Records Programme Management Group</p>	<p>Complete</p>

## Element 2: Records Manager Responsibility

RMP Element 2 Description	NHS Lothian Statement	Evidence	Action Plan
<p>Identify individuals within the organisation, answerable to senior management, to have operational responsibility for records management within the organisation.</p> <p>This is a compulsory element under the terms of the Public Records (Scotland) Act 2011: Section 1(2)(a)(ii)</p> <p>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.</p> <p>Further guidance about element 2 – <a href="http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement2.asp">http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement2.asp</a></p>	<p>Within NHS Lothian, the individual answerable to senior management and with a day to day responsibility for Records Management Plan is Alyson Cumming, Strategic Programme Records – Corporate Planning and Public Records.</p> <p>Marie McCallum, Business Manager and Chris Graham, Secretariat Services provide support with the review and implementation of the NHS Lothian Records Management Plan</p> <p>Professor Alex McMahon owns the actions identified within this document.</p> <p>Alyson Cumming Strategic Programme Manager NHS Lothian 2-4 Waterloo Place Edinburgh EH1 3EG <a href="mailto:alyson.cumming@nhslothian.scot.nhs.uk">alyson.cumming@nhslothian.scot.nhs.uk</a></p>	<p><a href="#">E02-01</a> Job description Strategic Programme Manager - Corporate Planning, Public Records, Managed Clinical Networks</p>	<p>Complete</p>



### ELEMENT 3: Records Management Policy Statement

RMP Element 3 Description	NHS Lothian Statement	Evidence	Action Plan
<p>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.</p> <p>This is a compulsory element under the terms of the Public Records (Scotland) Act 2011: Section 1 2(b)(i)</p> <p>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.</p> <p>Further guidance about element 3 - <a href="http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement3.asp">http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement3.asp</a></p>	<p>NHS Lothian adheres to the code of practice, guidance and advice outlined in the Scottish Government Records Management: NHS Code of Practice (Scotland). NHS Lothian policies and procedures outlined within this plan adhere to Scottish Government guidance.</p> <p><a href="http://www.gov.scot/Resource/Doc/366562/0124804.pdf">http://www.gov.scot/Resource/Doc/366562/0124804.pdf</a></p> <p>NHS Lothian has a number of policies and standards to underpin effective management of records</p> <p>NHS Lothian Head of Health Records has overall management responsibility Health Records Management Policies and Procedures. Health Records Managers at a number of NHS Lothian Hospital sites have responsibility for ensuring policies and procedures are adhered across their areas of management responsibility.</p> <p>All NHS Lothian staff are required to complete a mandatory training module relating to Information Governance and the Information Governance Manager undertakes annual road shows across the organisation to support communication with staff to outline responsibilities relating to Information Governance.</p> <p>All policy documents and guidance are</p>	<p><a href="#">E03-01</a> Information Assurance Strategy</p> <p><a href="#">E03-02</a> Information Governance Policy</p> <p><a href="#">E03-03</a> Information Governance Road shows 2015</p> <p><a href="#">E03-04</a> eHealth Security Policy</p> <p><a href="#">E03-05</a> Records Management Policy incorporating Retention and Destruction of Records Procedure</p> <p><a href="#">E03-06</a> Clinical Documentation Standards</p> <p><a href="#">E03-07</a> Corporate Records Management - REAS</p> <p><a href="#">E03-08</a> Guidance Note on Maintenance of Personal Files</p> <p><a href="#">E03-09</a> Internal Audit Plan 2014-15</p> <p><a href="#">E03-10</a> Safe Transmission of E-Mails</p>	<p>On-going</p> <p>Policies require regular review and update.</p> <p>All policies and standards include details of policy status, dates of authorisation and date for review</p>

	<p>available on the internal intranet site which can be accessed by all staff.</p> <p>NHS Lothian has a Records Management Policy which was approved by Professor Alison McCallum, Director of Public Health and Health Policy.</p> <p>All policies are located on the NHS Lothian Intranet and advises staff on contact details 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.</p> <p>There are separate individual policies for health records, adhering to the overarching NHS Lothian policy and reviewed every 3 years.</p> <p>NHS Lothian introduced a health records Scanning Bureau in 2012 to support NHS Lothian to move toward the full implementation of the Electronic Patient Record.</p> <p>The information Governance Advisory Board, Records Management Steering Group, eHealth Executive, NHS Lothian Partnership Forum and other senior committees review and approve Records policies within specific remits.</p> <p>Policy dissemination is undertaken in a variety of ways including the 'Lothian Report'</p>	<p><a href="#">E03-11</a> eHealth Newsletter – Records Scanning Bureau</p> <p><a href="#">E03-12</a> Screenshot Health Records Policies and Procedures</p> <p><a href="#">E03-13</a> eCasenotes</p> <p><a href="#">E03-14</a> eCasenotes</p>	
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## Element 4: Business Classification

<b>RMP Element 4 Description</b>	<b>NHS Lothian Statement</b>	<b>Evidence</b>	<b>Action Plan</b>
<p>A business classification scheme describes the business activities the authority undertakes – whether alone or in partnership.</p> <p>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:</p> <p>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 classification scheme.</p> <p>The term 'business classification' refers to a representation of an authority's functions and the records created pursuing those functions.</p> <p>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 fulfill this element, an authority will need to demonstrate that its business classification scheme can be applied to the record management systems which it operates.</p> <p>Further guidance about element 4 - <a href="http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement4.asp">http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement4.asp</a></p>	<p>NHS Lothian as a provider of healthcare creates large volumes of records to support patient care. Examples of policies to support the creation and management of health records policies and procedures to support records classification and filing systems are submitted as evidence.</p> <p>NHS Lothian recognises the organisation has a number of business classification schemes within directorates and services to support records management across the organisation. It is recognised work is required to standardise and streamline corporate business classification schemes and further work will be undertaken to support the required changes.</p> <p>Directorate and services utilise shared drives, access to these drives is granted to individuals dependent on business need.</p> <p>Examples of business classification schemes used within Corporate Service Directorates are provided as evidence.</p>	<p><a href="#">E04-01</a> New Registrations</p> <p><a href="#">E04-02</a> Access to CHI 24</p> <p><a href="#">E04-03</a> Merging UHPI on TRAK</p> <p><a href="#">E04-04</a> Making Up Duplicate Records</p> <p><a href="#">E04-05</a> Managing Large Volumes</p> <p><a href="#">E04-06</a> Managing of Library – Filing of Casenotes</p> <p><a href="#">E04-07</a> Board Committee Servicing Protocol</p> <p><a href="#">E04-08</a> LHSA Cataloguing Procedure</p> <p><a href="#">E04-09</a> Operating Procedure Finance Shared Drive</p>	<p>On-going</p> <p>Policies require regular review and update.</p> <p>All policies and standards include details of policy status, dates of authorisation and date for review.</p> <p>Further action is required to develop and implement business classification schemes across the organisation outlining structure and business functions in each department, to support document management system and provide guidance to staff to support document management.</p>

## Element 5: Retention Schedules

RMP Element 5 Description	NHS Lothian Statement	Evidence	Action Plan
<p>A retention schedule is a list of records for which pre-determined disposal dates have been established.</p> <p>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.</p> <p>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.</p> <p>Further guidance about element 5 – <a href="http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement5.asp">http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement5.asp</a></p>	<p>The Scottish Government NHS Records Management Code of Practice (Scotland) 2012 outlines best practice in relation to the creation, use, storage, management and disposal of NHS records and provides information on legal obligations that apply to NHS records.</p> <p><a href="http://www.gov.scot/Resource/Doc/366562/0124804.pdf">http://www.gov.scot/Resource/Doc/366562/0124804.pdf</a></p> <p>NHS Lothian Board and Committee Servicing Protocol outlines arrangements for the management of corporate records.</p> <p>NHS Lothian retention and destruction of health records policy outlines arrangement for retention and disposal of NHS Lothian health records.</p> <p>Off site storage of records is managed by private contractors such as Iron Mountain and RSS and contracts which adhere to the National and NHS Lothian policy, are held by relevant senior managers.</p>	<p><a href="#">E05-01</a> Health Records Retention and Destruction Policy</p> <p><a href="#">E05-02</a> Board and Committee Servicing Protocol</p> <p><a href="#">E05-03</a> Waste Disposal Audit Template</p> <p><a href="#">E05-04</a> NHS Lothian Agreement – Confidential Waste Uplift and Destruction</p> <p><a href="#">E05-05</a> Audit Report Collection, transportation and destruction of confidential material</p> <p><a href="#">E05-06</a> Archive Invoice</p> <p><a href="#">E05-07</a> Screenshot Retention and Disposal</p>	<p>On-going</p> <p>Policies require regular review and update.</p> <p>Contract / Service Level Agreements associated with external retention of records require to be renewed and updated.</p>

## Element 6: Destruction Arrangements

RMP Element 6 Description	NHS Lothian Statement	Evidence	Action Plan
<p>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.</p> <p>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:</p> <p>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.</p> <p>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.</p> <p>Further guidance about element 6 – <a href="http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement6.asp">http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement6.asp</a></p>	<p>The policy relating to the retention and destruction of health records outlines the arrangements for retention and destruction of records. The Records Policy details destruction schedules and processes which reflect national guidance for disposal of confidential waste.</p> <p>NHS Lothian's procedure relating to Board and Committee Servicing Protocol (E05-02) indicates all paper records should be scanned and saved in PDF format and hard copies of documents destroyed in line destruction procedures.</p> <p>Supporting information outlining retention / destruction periods for a wide range of records held across the organisation is available to staff on the NHS Lothian Intranet site as is information relating to guidance on the disposal of confidential waste. NHS Boards lack the functionality to destruct records from national systems such as TRAK (patient administration system).</p> <p>It is not always cost-effective or practical for an authority to securely destroy records in-house. Along with other authorities NHS Lothian engages professional contractors to destroy records and ensure the process is supervised and documented. This follows strict security and confidentiality rules and is signed at contract.</p>	<p><a href="#">E06-01</a> Retention and Destruction of Records</p> <p><a href="#">E06-02</a> Health Records Policy – Confidential Waste</p> <p><a href="#">E06-03</a> Records Destruction Summary</p> <p><a href="#">E06-04</a> Staff Guidance Confidential Waste</p> <p><a href="#">E06-05</a> Destruction of Scanned Notes</p> <p><a href="#">E06-06</a> LHAS De-accessioning -Disposal</p> <p><a href="#">E06-07</a> eHealth Secure Storage, Disposal and Destruction of Electronic Equipment and Media Policy</p> <p><a href="#">E06-08</a> Example Destruction Certificate</p>	<p>On-going</p> <p>Policies require regular review and update</p>

## Element 7: Archiving and Transfer Arrangements

RMP Element 7 Description	NHS Lothian Statement	Evidence	Action Plan
<p>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.</p> <p>This is a compulsory element under the terms of the Public Records (Scotland) Act 2011 Section 1 2(b)(iii)</p> <p>Obligations under the Public Records (Scotland) Act 2011 (the Act) the following guidance is issued regarding an authority's archiving policy and transfer arrangements.</p> <p>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).</p> <p>It is a fundamental part of a records management plan that procedures for facilitating such transfers are in place and are followed.</p> <p>Further guidance about element 7-  <a href="http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement7.asp">http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement7.asp</a></p>	<p>NHS Lothian transfer of records and files policies have been agreed by the information governance steering group, signed off by the Director of Public Health and Health policy. Approval and formal sign off is undertaken following consultation, at the Information Governance Steering Group.</p> <p>These policies include:</p> <ul style="list-style-type: none"> <li>• Transfer of health records between healthcare sites for daily use</li> <li>• Transfer of records to the records storage firms for short and long term storage</li> </ul> <p>Where records require to be retained for permanent preservation, this is managed via the Lothian Health Service Archive (LHSA) which holds historically important records of NHS hospitals and other health-related material. The LHSA collect, preserve and catalogue these records and promote them to increase understanding of the history of health.</p> <p>LHSA was awarded Accredited Archive Status in 2014.</p> <p>A contract exists and procedures in operation between NHS Lothian and NHS Lothian Archive Service run within the University of Edinburgh</p>	<p><a href="#">E07-01</a> Safe Transfer of Records Policy</p> <p><a href="#">E07-02</a> Health Records Policy – Casenote Tracking</p> <p><a href="#">E07-03</a> Example of Classification of LHSA collection of records for NHS Hospitals and Administrative Bodies is available via the web link below</p> <p><a href="http://www.lhsa.lib.ed.ac.uk/collections/LHB_list.htm">http://www.lhsa.lib.ed.ac.uk/collections/LHB_list.htm</a></p> <p><a href="#">E07-04</a> LHSA Accession Guidelines for Staff</p> <p><a href="#">E07-05</a> LHSA Accession Form</p> <p><a href="#">E07-06</a> LHSA collection Development Policy</p> <p><a href="#">E07-07</a> LHSA Collection Information Policy</p> <p><a href="#">E07-08</a> LHSA Collections Management Policy</p> <p><a href="#">E07-09</a> LHSA Deceased Individuals</p> <p><a href="#">E07-10</a> LHSA Living</p>	<p>On-going</p> <p>Policies require regular review and update.</p>

		Individuals <a href="#">E07-11</a> LHSA Leaflet	
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## Element 8: Information Security

<b>RMP Element 8 Description</b>	<b>NHS Lothian Statement</b>	<b>Evidence</b>	<b>Action Plan</b>
<p>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.</p> <p>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:</p> <p>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.</p> <p>Further guidance about element 8 - <a href="http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement8.asp">http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement8.asp</a></p>	<p>NHS Lothian Information Security Policy is available for all staff on the NHS Lothian Intranet for common use. Each member of staff has to read and understand the policy during induction to employment. The most recent policy was signed off at the Information Governance Advisory Board.</p> <p>As staff members log on each day they are forced to agree that they have read and understand Security and DPA principles.</p> <p>All supporting Information Governance policies and guidance documents are available on the NHS Lothian Information Governance web pages on NHS Lothian Intranet site.</p>	<p><a href="#">E08-01</a> eHealth Security Policy</p> <p><a href="#">E08-02</a> Secure Storage, Disposal and Destruction of Electronic Equipment and Media Policy</p> <p><a href="#">E08-03</a> Safe Email Transmission</p> <p><a href="#">E08-04</a> System Access and Password Management</p> <p><a href="#">E08-05</a> Policy on Confidentiality of Personal Health Information</p> <p><a href="#">E08-06</a> Patient Confidentiality Letter to All Staff</p> <p><a href="#">E08-07</a> LHSA Lothian Disclosure Guidance</p> <p><a href="#">E08-08</a> Screenshot Information Governance Supporting Policies</p> <p><a href="#">E08-09</a> Information Governance FAQs</p>	<p>On-going</p> <p>Policies require regular review and update</p>



## Element 9: Data Protection

RMP Element 9 Description	NHS Lothian Statement	Evidence	Action Plan
<p>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.</p> <p>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:</p> <p>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.</p> <p>Further guidance about element 9 - <a href="http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement9.asp">http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement9.asp</a></p>	<p>NHS Lothian is registered under the Data Protection Act 1998.</p> <p>NHS Lothian Data Protection Policy fully reflects the Data Protection Act 1998.</p> <p>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.</p> <p>Aspects of Information Governance are overseen by the Information Governance Advisory Board chaired by the NHS Lothian Caldicott Guardian, Professor Alison McCallum.</p> <p>All staff receive training on Data Protection at induction.</p> <p>All staff are bound by the NHS Code of confidentiality.</p> <p>All staff are required to undertake information governance mandatory training every 2 years. This is supported through the Learnpro module relating to information Governance which includes modules relating to IT security, Data Protection and Confidentiality and Records Management</p> <p>Information Governance road shows are</p>	<p><a href="#">E09-01</a> NHS Lothian Data Protection Policy</p> <p><a href="#">E09-02</a> Information Governance Policy</p> <p><a href="#">E09-03</a> Confidentiality Policy</p> <p><a href="#">E09-04</a> 2015 Information Governance Road show Presentation</p> <p><a href="#">E09-05</a> Screenshot NHS Lothian Learnpro Information Governance Mandatory Module</p> <p><a href="#">E09-06</a> Access to Health Records</p> <p><a href="#">E09-07</a> Health Records Access Form</p> <p><a href="#">E09-08</a> LHSA Anonymising Qualitative Material</p> <p><a href="#">E09-09</a> LHSA Student Guidance Patient Data</p> <p><a href="#">E09-10</a> Caldicott Guardian</p>	<p>On-going</p> <p>Policies require regular review and update</p>

	<p>undertaken annually outlining staff obligations to data protection and security. Requirements associated with Public Records (Scotland) Act 2011 will be incorporated within future road shows.</p> <p>In addition NHS Lothian operates a 'Fairwarning' process utilising software endorsed by the Scottish government Information Governance Department. Monitoring of information breach incidents is undertaken by the Information Governance team and reports discussed at a 'Fairwarning' Committee attended by senior managers and chaired by an Executive Director.</p> <p>Details for members of the public to access information under the Freedom of Information (Fol) Act 2005 is available on NHS Lothian's website  <a href="http://www.nhslothian.scot.nhs.uk/YourRights/FOI/Pages/default.aspx">http://www.nhslothian.scot.nhs.uk/YourRights/FOI/Pages/default.aspx</a></p> <p><b><u>Information Commissioners Officer (ICO) Registration Details</u></b>  Registration Number: Z5757124  Date Registered: 14 September 2001  Registration Expires: 13 September 2016  Data Controller: LOTHIAN HEALTH BOARD  Address:  NHS LOTHIAN  WAVERLEY GATE  2-4 WATERLOO PLACE  EDINBURGH  EH1 3EG</p>		
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## Element 10: Business Continuity and Vital Records

<b>RMP Element 10 Description</b>	<b>NHS Lothian Statement</b>	<b>Evidence</b>	<b>Action Plan</b>
<p>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.</p> <p>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.</p> <p>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.</p> <p>This applies whether the records kept are paper based, electronic or, most likely, a hybrid of the two.</p> <p>Further guidance about element 10 –</p> <p><a href="http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement10.asp">http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement10.asp</a></p>	<p>NHS Lothian business continuity arrangements include corporate, departmental and hospital site / service recovery and continuity plans.</p> <p>All records and data stored on NHS Lothian networks are subject to regular backup and recovery procedures. In the event of eHealth systems failure, NHS Lothian employs a vital recovery arrangement associated with clinical records.</p> <p>NHS Lothian's Emergency Planning Officer supports resilience and business continuity arrangements across the organisation.</p>	<p><a href="#">E10-01</a> NHS Lothian Resilience Assurance Protocol</p> <p><a href="#">E10-02</a> Resilience Governance Arrangements</p> <p><a href="#">E10-03</a> Resilience Plan Checklist</p> <p><a href="#">E10-04</a> Resilience Assurance Proforma</p> <p><a href="#">E10-05</a> Business Continuity Plan eHealth</p>	<p>Ongoing</p> <p>Plans are subject to review and update</p>

## Element 11: Audit Trail

RMP Element 11 Description	NHS Lothian Statement	Evidence	Action Plan
<p>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.</p> <p>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:</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Further guidance about element 11 – <a href="http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement11.asp">http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement11.asp</a></p>	<p>NHS Lothian Development, Approval and Communication of Policies and Procedures document outlines the commitment of the organisation to implementation of naming conventions and version control for corporate records. This policy has been approved by the NHS Lothian Partnership Forum.</p> <p>The NHS Lothian Clinical Documentation Standards outline methodology for search and retrieval documents and for naming conventions of clinical policies and all clinical records. A Clinical Documentation Group meets quarterly to approve new clinical documentation.</p> <p>The electronic Patient Administration system, TRAK, enables internal audit of recording activity. It also has a tracking feature used when transferring patient records.</p> <p>Audit of movement within electronic health records is monitored in the process of 'Fairwarning'. Inappropriate activity is subject to scrutiny and potentially disciplinary action.</p> <p>Staff requiring access to NHS Lothian shared drives must complete a User ID Request Form. This form also includes agreement to adhere to NHS Lothian eHealth Security Statement. Line</p>	<p><a href="#">E11-01</a> Health Records Policy – Casenote Tracking</p> <p><a href="#">E11-02</a> Team Brief – Fair warning Automated Audit of Systems Access</p> <p><a href="#">E11-03</a> NHS Lothian User ID Request Form</p> <p><a href="#">E11-04</a> eHealth Security Policy</p> <p><a href="#">E11-05</a> Patient Confidentiality Letter to All Staff</p> <p><a href="#">E11-06</a> Job Description Data Quality manager</p> <p><a href="#">E11-07</a> Job Description Waiting Times Governance</p> <p><a href="#">E11-08</a> Waiting Times Governance Framework</p>	<p>Ongoing</p> <p>Policies and audit systems are subject to review and update</p>

	managers have a responsibility to notify the eHealth department of staff who leave the organisation to ensure access rights are deleted.		
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## Element 12: Competency Framework for Records Management Staff

<b>RMP Element 12 Description</b>	<b>NHS Lothian Statement</b>	<b>Evidence</b>	<b>Action Plan</b>
<p>A competency framework lists the core competencies and the key 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.</p> <p>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:</p> <p>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.</p> <p>Read further explanation and guidance about element 12 - <a href="http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement12.asp">http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement12.asp</a></p>	<p>NHS Lothian provides appropriate training and development to ensure all staff are aware of the records management responsibilities.</p> <p>NHS Lothian facilitates records administration training for all records management staff.</p> <p>Specialist posts such as security and Data Protection officers have competency levels to achieve. These are outlined in job descriptions and KSF dimensions.</p> <p>The individual with day to day responsibility for the records management and individuals who directly support NHS Lothian Public Records Management Group are supported to attend Public Records National Conferences and are members of the NHS Scotland Records Management Forum</p> <p>NHS Lothian Information Governance Learnpro Mandatory Training for all staff members includes a module relating to Lothian Records Management</p>	<p><a href="#">E12-01</a> NHS Scotland Information Governance Competency Framework</p> <p><a href="#">E12-02</a> NHS Lothian Health Records Administrative Training Course</p> <p><a href="#">E12-03</a> Board Committee Servicing Protocol</p> <p><a href="#">E12-04</a> Minutes of NHS Scotland Records Management Forum</p> <p><a href="#">E12-05</a> Information Governance Mandatory Training Modules</p> <p><a href="#">E12-06</a> Information Governance Records Management Module</p>	<p>On going</p> <p>Training courses and policies are subject to review and update</p>

## Element 13: Assessment and Review

<b>RMP Element 13 Description</b>	<b>NHS Lothian Statement</b>	<b>Evidence</b>	<b>Action Plan</b>
<p>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.</p> <p>The Keeper considers that it is a fundamental part of a records management plan (RMP) that it is reviewed:</p> <ul style="list-style-type: none"> <li>• Shortly after implementation to determine whether it is operating as expected.</li> <li>• 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.</li> </ul> <p>Read further explanation and guidance about element 13 – <a href="http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement13.asp">http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement13.asp</a></p>	<p>The Strategic Programme Manager – Corporate Planning and Public Records role is to monitor, support implementation and continual assessment and review of NHS Lothian’s Records Management Plan.</p> <p>The following groups and committees ensure continual assessment and review of elements within the Plan:</p> <ul style="list-style-type: none"> <li>•NHS Lothian Information Governance Advisory Board</li> <li>•Information Governance working Group</li> <li>•Fairwarning Committee</li> <li>•Data Quality Group</li> <li>•Clinical Documentation Group</li> <li>•NHS Lothian Partnership Forum</li> <li>•NHS Lothian and Borders Data Sharing Partnership</li> </ul> <p>NHS Lothian will provide an annual update reports to the Healthcare Governance Committee to ensure both improvements associated with the Records Management Plan and policies and procedures associated with plan are updated as appropriate.</p>	<p><b>E13-01</b> Terms of Reference Healthcare Governance Committee</p>	<p>Ongoing</p> <p>Group and Committee Reporting</p>

## Element 14: Shared Information

<b>RMP Element 14 Description</b>	<b>NHS Lothian Statement</b>	<b>Evidence</b>	<b>Action Plan</b>
<p>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.</p> <p>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):</p> <p>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.</p> <p>Read further explanation and guidance about element 14 - <a href="http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement14.asp">http://www.nas.gov.uk/recordKeeping/PRSA/guidanceElement14.asp</a></p>	<p>NHS Lothian 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.</p> <p>A range of sub policies support the generic Information Sharing Protocol and can be found on the organisation Intranet.</p> <p>NHS Lothian supports the social care electronic portal and protocols are reviewed and revised as appropriate for joint health and social care record keeping.</p>	<p><a href="#">E14-01</a> Multi Agency Public Protection Arrangements – Information Sharing for General Practitioners Across NHS Lothian</p> <p><a href="#">E14-02</a> NHS Lothian Adult Support and Protection Procedures</p> <p><a href="#">E14-03</a> Child Protection Procedures Information Sharing</p> <p><a href="#">E14-04</a> Practical Guide Sharing Information with Families and Carers of Patients</p> <p><a href="#">E14-05</a> Information Sharing Guidelines for GPs</p> <p><a href="#">E14-06</a> Information Sharing with Other NHS Boards</p> <p><a href="#">E14-07</a> Clinical Portal Reference Guide</p> <p><a href="#">E14-08</a> South and East Clinical Portal Consortia Assurance Group</p>	<p>Ongoing</p> <p>Data sharing protocols are subject to ongoing review and will require further development to support the establishment of Health and Social Care Partnerships</p>



## NHS Lothian Public Records Management Plan Improvement Plan

The development of NHS Lothian's Records Management Plan has highlighted a number of improvement actions which require to be addressed across the organisation as outlined below. A detailed implementation plan to support the high level actions outlined in this plan will be supported through the NHS Lothian Public Records Management Programme Group.

<b>RMP Element</b>	<b>Action</b>	<b>Responsible</b>
Element 3 Records Management Policy Statement	<ul style="list-style-type: none"> <li>Ensure policies relating to Public Records (Scotland) Act 2011 are reviewed and updated in line with policy control sheets</li> </ul>	Policy Owners
Element 4 Business Classification Scheme (BCS)	<ul style="list-style-type: none"> <li>Directors to nominate managers with overall responsibility for local business classification schemes to allow an organisational wide BCS to be developed</li> <li>Manager with overall responsibility to contact nominated managers to support development of local BCS</li> <li>Responsible records managers to ensure implementation and maintenance of fully functioning BCS</li> </ul>	Directors  Public Records Manager  To be confirmed
Element 5 Retention Schedules	<ul style="list-style-type: none"> <li>Identify local records champions to ensure local adherence and management of retention and destruction schedules as appropriate</li> </ul>	Public Records Manager via nominated responsible records managers
Element 6 Destruction Arrangements	<ul style="list-style-type: none"> <li>Departments to develop policies and procedures to support a uniform approach to auditable destruction of records held on network drives in line with retention schedules</li> <li>Ensure policies associated with destruction of PCs, drives mobile devices, hardware are reviewed and updated as appropriate</li> <li>Ensure on-going monitoring of contracts / agreements associated with disposal of confidential waste</li> </ul>	Public Records Manager Departmental Records Managers  Facilities
<b>RMP Element</b>	<b>Action</b>	<b>Responsible</b>
Element 7	<ul style="list-style-type: none"> <li>Ensure policies and procedures in place to transfer and</li> </ul>	Director of Public Health

Archiving and Transfer	archive records Lothian Health Services Archive are regularly reviewed and updated	and LHSA
Element 8 Information Security	<ul style="list-style-type: none"> <li>• Continue to improve and monitor compliance with mandatory training relating to Information Governance</li> <li>• Continue to promote Information Governance including responsibilities associated with the Public Records (Scotland) Act through annual road shows</li> </ul>	Directors and Line Managers Public Records Manager Information Governance Manager
Element 9 Data Protection	<ul style="list-style-type: none"> <li>• Continue to improve and monitor compliance with mandatory training relating to Data Protection</li> <li>• Continue to promote data protection through annual Information Governance road shows</li> </ul>	Director of Public Health Information Governance Manager
Element 10 Business Continuity and Vital Records	<ul style="list-style-type: none"> <li>• Liaise with the NHS Lothian Business Continuity Lead to seek assurance appropriate business continuity plans have been completed for service areas</li> </ul>	Public Records Manager
Element 11 Audit Trail	<ul style="list-style-type: none"> <li>• Departments to develop local procedures to support an audit of records transfer.</li> <li>• Work with local records managers on the development of local plans for the management of creation and transfer of departmental documents</li> <li>• Explore the potential to procure a document management system to support document management</li> </ul>	Public Records Manager Local Records Managers
Element 12 Competency Framework Records Management	<ul style="list-style-type: none"> <li>• Ensure records management policies are reviewed and updated in line with policy control sheets</li> <li>• Review compliance with Information Governance mandatory training which includes a module relating to Records Management (both health and corporate records)</li> <li>• Public Records Manager to continue to attend national conferences and meetings to support development of NHS Lothian's plan and sharing of good practice</li> </ul>	Policy Owners Director of Public Health Public Records Manager Local Records Managers

<b>RMP Element</b>	<b>Action</b>	<b>Responsible</b>
Element 13 Assessment and Review	<ul style="list-style-type: none"> <li>• NHS Lothian Public Records Programme Group to continue to meet on a bi-monthly basis to support development of detailed public records improvement plan</li> <li>• Submit annual reports outlining progress with implementation of NHS Lothian Public Records Management Plan to the Healthcare Governance Committee</li> <li>• Provide annual update reports to the Keeper of Records Scotland to any new policies to support the Public Records (Scotland) Act 2011, revisions / updates to existing policies and progress with the development and implementation of NHS Lothian's Public Records Improvement Plan</li> <li>• Establish links with Lothian Integration Joint Boards (IJB) to support development of IJB Records Management Plans</li> </ul>	Public Records Executive Lead Public Records Manager Local Records Managers
Element 14 Shared Information	<ul style="list-style-type: none"> <li>• Protocols to support information sharing are reviewed and updated as required</li> <li>• Awareness of additional information sharing protocols which may be developed as a result of the establishment of Health and Social Care Partnerships</li> </ul>	Public Protection Action Group Public Records Manager

## Appendix 1

## Summary of Evidence

Reference	Evidence Document	Review Date	Owner
<b><u>Element 1: Senior Management Responsibility</u></b>			
<a href="#">E01-01</a>	June 2013 Joint Management Team paper confirming senior manager with responsibility for records management	Complete	A McMahon
<a href="#">E01-02</a>	December 2015 Corporate Management Team paper seeking approval to submit draft plan to the Keeper for information review and feedback	Complete	A McMahon
<a href="#">E01-03</a>	Sample minutes of NHS Lothian Strategic Public Records Programme Management Group	Ongoing	A Cumming
<b><u>Element 2: Records Manager Responsibility</u></b>			
<a href="#">E02-01</a>	Job Description Strategic Programme Manager Corporate Planning, Public Records and Managed Clinical Networks	Complete	A Cumming
<b><u>Element 3: Records Management Policy Statement</u></b>			
<a href="#">E03-01</a>	Information Assurance Strategy	April 2016	A McCallum
<a href="#">E03-02</a>	Information Governance Policy	July 2018	A McCallum
<a href="#">E03-03</a>	Information Governance Road Shows 2015	Annual Update	T McKinley
<a href="#">E03-04</a>	eHealth Security Policy	May 2016	M Egan
<a href="#">E03-05</a>	Records Management Policy	November 2018	A McCallum
<a href="#">E03-06</a>	Clinical Documentation Standards	September 2016	Doc Group
<a href="#">E03-07</a>	Example Corporate Records Management – Royal Edinburgh and Associated Hospitals	October 2015	REAS Management Team
<a href="#">E03-08</a>	Guidance Note on the Maintenance of Personal Files	Current	Director HR
<a href="#">E03-09</a>	NHS Lothian Internal Audit Plan 2014--15	Most Recent Available	Various
<a href="#">E03-10</a>	eHealth Safe Email Transmission (SOP)	Current	M Egan
<a href="#">E03-11</a>	eHealth Newsletter Records Scanning	Current	M Egan
<a href="#">E03-12</a>	Screenshot Health Records Policies and Procedures	Current	Various
<a href="#">E03-13</a>	eCasenotes screenshot	April 2016	M Masterton
<a href="#">E03-14</a>	eCasenotes screenshot	April 2016	M Masterton
<b><u>Element 4: Business Classification</u></b>			
<a href="#">E04-01</a>	New Registrations	November 2018	M Masterton
<a href="#">E04-02</a>	Access to CHI 24	November 2018	M Masterton
<a href="#">E04-03</a>	Merging UHPI on TRAK	November 2018	M Masterton
<a href="#">E04-04</a>	Making Up Duplicate Records	November 2018	M Masterton
<a href="#">E04-05</a>	Managing Large Volumes	November 2018	M Masterton
<a href="#">E04-06</a>	Managing Library – Filing of Casenotes	November 2018	M Masterton
<a href="#">E04-07</a>	Board Committee Servicing Protocol	Current	Dept Leads
<a href="#">E04-08</a>	LHSA Cataloguing Procedure	Current	LHSA
<a href="#">E04-09</a>	Operating Procedure for the Finance Shared Drive	Current	Finance Dept

Reference	Evidence Document	Review Date	Owner
<b><u>Element 5: Retention Schedules</u></b>			
<a href="#">E05-01</a>	Health Records Retention and Destruction Policy	Current	eHealth
<a href="#">E05-02</a>	Board Committee Servicing Protocol	Current	Secretariat
<a href="#">E05-03</a>	Waste Disposal Audit Template	Current	Facilities
<a href="#">E05-04</a>	Agreement Confidential Waste Uplift and Destruction	Current	Facilities
<a href="#">E05-05</a>	Audit Report – Uplift of Confidential Material	Current	Facilities
<a href="#">E05-06</a>	Records Archive Invoice	Current	Corporate
<a href="#">E05-07</a>	Screenshot Retention and Disposal Guidelines	Current	Corporate
<b><u>Element 6: Destruction Arrangements</u></b>			
<a href="#">E06-01</a>	Retention and Destruction of Records	November 2018	M Masterton
<a href="#">E06-02</a>	Health Records Policy – Confidential Waste	November 2018	M Masterton
<a href="#">E06-03</a>	Records Destruction Summary	Current	Corporate
<a href="#">E06-04</a>	Staff Guidance on Confidential Waste	Intranet Screen Shot	Corporate
<a href="#">E06-05</a>	Destruction of Scanned Records	Current	
<a href="#">E06-06</a>	LHSA De-accessioning – Disposal	Current	LHSA
<a href="#">E06-07</a>	eHealth Secure Storage, Disposal and Destruction of Electronic Equipment and Medial Policy	Current	eHealth
<a href="#">E06-08</a>	Example Destruction Certificate	Current	Facilities
<b><u>Element 7: Archiving and Transfer Arrangements</u></b>			
<a href="#">E07-01</a>	Safe Transfer of Records Policy	April 2016	A McCallum
<a href="#">E07-02</a>	Health Records Policy – Casenote Tracking	November 2018	M Masterton
<a href="#">E07-03</a>	Example of LHSA Classification	Current	LHSA
<a href="#">E07-04</a>	LHSA Accession Guidelines for Staff	Current	LHSA
<a href="#">E07-05</a>	LHSA Accession Form	Current	LHSA
<a href="#">E07-06</a>	LHSA Collection Development Policy	Current	LHSA
<a href="#">E07-07</a>	LHSA Collection Information Policy	Current	LHSA
<a href="#">E07-08</a>	LHSA Collections Management Policy	Current	LHSA
<a href="#">E07-09</a>	LHSA Deceased Individuals	Current	LHSA
<a href="#">E07-10</a>	LHSA Living Individuals	Current	LHSA
<a href="#">E07-11</a>	LHSA Leaflet	Current	LHSA
<b><u>Element 8: Information Security</u></b>			
<a href="#">E08-01</a>	eHealth Security Policy	May 2016	M Egan
<a href="#">E08-02</a>	Secure Storage, Disposal and Destruction of Electronic Equipment and Media Policy	January 2016	A McCallum
<a href="#">E08-03</a>	Safe Email Transmission	November 2015	T McKinley
<a href="#">E08-04</a>	Systems Access and Password Management	Current	A McCallum
<a href="#">E08-05</a>	Policy on Confidentiality of Personal Health Information	March 2015	Clinical Policy Group
<a href="#">E08-06</a>	Patient Confidentiality Letter to All Staff	Intranet Screenshot	T McKinley
<a href="#">E08-07</a>	LHSA Lothian Disclosure Guidance	Current	LHSA
<a href="#">E08-08</a>	Screenshot Information Governance Supporting Policies	Current	T McKinley
<a href="#">E08-09</a>	Information Governance FAQs	Current	T McKinley

Reference	Evidence Document	Review Date	Owner
<b><u>Element 9: Data Protection</u></b>			
<a href="#">E09-01</a>	NHS Lothian Data Protection Policy	July 2018	A McCallum
<a href="#">E09-02</a>	Information Governance Policy	July 2018 – awaiting endorsed policy	A McCallum
<a href="#">E09-03</a>	Confidentiality Policy	March 2015	Clinical Policy Group
<a href="#">E09-04</a>	2015 Information Governance Roadshow Presentation	2016	T McKinley
<a href="#">E09-05</a>	NHS Lothian Learnpro Information Governance	Current	T McKinley
<a href="#">E09-06</a>	Access to Health Records	Current	eHealth
<a href="#">E09-07</a>	Health Records Access Form	Current	eHealth
<a href="#">E09-08</a>	LHSA Anonymising Qualitative Material	Current	LHSA
<a href="#">E09-09</a>	LHSA Student Guidance Patient Data	Current	LHSA
<a href="#">E09-10</a>	Caldicott Guardian Intranet Page	Current	D Foley
<b><u>Element 10: Business Continuity and Vital Records</u></b>			
<a href="#">E10-01</a>	NHS Lothian Resilience Assurance Protocol	January 2016	A Elliot
<a href="#">E10-02</a>	Resilience Governance Arrangements	Current	A Elliot
<a href="#">E10-03</a>	Resilience Plan Checklist	Current	A Elliot
<a href="#">E10-04</a>	Resilience Assurance Proforma	Current July 2015	A Elliot
<a href="#">E10-05</a>	Business Continuity Plan eHealth	Current	eHealth
<b><u>Element 11: Audit Trail</u></b>			
<a href="#">E11-01</a>	Health Records Policy – Casenote Tracking	November 2018	M Masterton
<a href="#">E11-02</a>	Team Brief – Fair Warning – Automated Audit of Systems Access	2014 Team Brief – All Staff	T McKinley
<a href="#">E11-03</a>	eHealth Technical Services Policy	Current	eHealth
<a href="#">E11-04</a>	eHealth Security Policy	Current	eHealth
<a href="#">E11-05</a>	Patient Confidentiality Letter to All Staff		
<a href="#">E11-06</a>	Job Description – Data Quality Manager	Draft To Be Approved	LAS
<a href="#">E11-07</a>	Job Description – Waiting Times Governance	Draft To Be Approved	LAS
<a href="#">E11-08</a>	Waiting Times Governance Framework	Current	LAS
<b><u>Element 12: Competency Framework for Records Management Staff</u></b>			
<a href="#">E12-01</a>	NHS Education for Scotland Information Governance Competency Framework	Current	NES
<a href="#">E12-02</a>	NHS Lothian Health Records Administrative Training Course	Current	M Masterton
<a href="#">E12-03</a>	Board Committee Servicing Protocol	Current	Secretariat
<a href="#">E12-04</a>	Minutes NHS Scotland Records Management Forum	Current	A Cumming
<a href="#">E12-05</a>	Information Governance Learnpro Mandatory Training	Current	T McKinley
<a href="#">E12-06</a>	Information Governance Learnpro Mandatory Training – Records Management	Current	T McKinley

Reference	Evidence Document	Review Date	Owner
<b><u><a href="#">Element 13 – Assessment and Review</a></u></b>			
<b><u><a href="#">E13-01</a></u></b>	Terms of Reference Healthcare Governance Committee	Current	Secretariat
<b><u><a href="#">Element 14: Shared Information</a></u></b>			
<b><u><a href="#">E14-01</a></u></b>	Multi Agency Public Protection Arrangements – Information Sharing for General Practitioners Across Lothian	Current	Public Protection Action Group
<b><u><a href="#">E14-02</a></u></b>	NHS Lothian Adult Support and Protection Procedures	October 2016	Public Protection Action Group
<b><u><a href="#">E14-03</a></u></b>	Child Protection Procedures Information Sharing	Current	S Egan
<b><u><a href="#">E14-04</a></u></b>	Practical Guide to Sharing Information with Families and Carers of Patients	Current	Public Protection Group
<b><u><a href="#">E14-05</a></u></b>	Information Sharing Guidelines for GPs	Current	Public Protection Action Group
<b><u><a href="#">E14-06</a></u></b>	Information Sharing with Other NHS Boards	Current	Portal Consortia
<b><u><a href="#">E14-07</a></u></b>	Clinical Portal Reference Guide	Current	Portal Consortia
<b><u><a href="#">E14-08</a></u></b>	South and East Clinical Portal Consortia Assurance Group	Current	Portal Consortia