**Records Management Policy**

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| Version No: | 1 | Approved By: | VJ | Approval Date: | 11/12/19 | Review Date:  |  |

**Introduction**

1.1         CPGM Healthcare Limited (CHL) is committed to managing its records, in whatever format, to minimum agreed standards.  This Policy establishes how the company will manage its records.  It also defines the roles and responsibilities for the creation, storage, access, amendment and disposal of company information.  This document provides the policy framework through which this effective management can be achieved and audited.

**2.0         Aims**

2.1         The aim of this policy is to consolidate a consistent approach to Records Management across all functions within the company and establish requirements designed to help staff meet legal obligations relating to Records Management and to manage records so that their value as a corporate resource for the company is fully exploited.

2.2         It will ensure that non-essential records are destroyed in a consistent and confidential manner in line with the company’s disposal schedule.  It allows the company to identify what it retains as a permanent record of its activities.  The schedule also enables the destruction of those records which have outlived their administrative usefulness and are without significance for the historical or legal record.

**3.0         Scope**

3.1         This policy applies to all records created, received or maintained by staff of the company in the course of carrying out their corporate function.  Records and documentation created in the course of research, whether internally and externally-funded are also subject to the company’s contractual record keeping requirements.  These records may exist in printed or digital form.

**4.0         Definitions**

4.1         **Records** are defined in the Lord Chancellor’s Code of Practice as: ‘Information created, received and maintained as evidence and information by an organization or person, in pursuance of legal obligations or in the transaction of business.  This is any information, regardless of format or medium, captured in a reproducible format.

4.2         A **document** is any piece of written information in any form, produced or received by an organisation or person.

**Note** all records start off as documents, but not all documents will ultimately become records.

4.3         **Records Management** is the creation, maintenance, control, storage and disposal of records in a way which facilitates their most appropriate, efficient and effective use.

4.4         A **Disposal Schedule** is a list of records and the appropriate time limits that they must be kept for before they can be confidentially destroyed or transferred to archives for permanent storage. This document also defines which area of the company is responsible for the storage and disposal of records.

**5.0         Responsibilities**

5.1         The company has a corporate responsibility to maintain its records and record-keeping systems in accordance with the regulatory environment. The Chair is responsible for the implementation of a corporate Records Management procedure within the Company.

5.2         The Directors are responsible for drawing up guidance for good Records Management practice and promoting compliance with this policy and are responsible for the co-ordination of the Records Management function across the Company. It is also the responsibility of the Directors to work with all areas of the company to ensure that this policy is understood and adhered to.

5.3         The Directors are responsible for supporting good Records Management by providing guidance and codes of conduct on the use of IT systems. The Directors also responsible for the security of data held electronically and ensuring that it is backed up in accordance with company policy

5.4         The Directors must ensure that records for which they are responsible are accurate, and maintained and disposed of in accordance with the Company’s Records Management guidelines.  The Directors should develop best practice guidelines for staff to follow and adopt Records Management principles.  All records should have an identified ‘owner’ responsible for their management whilst in regular use.

5.5         All Company staff who create, receive and use company records hold Records Management responsibilities.  All members of staff are responsible for ensuring they exercise good Records Management in their daily working practice, which includes:

* The creation and maintenance of accurate and reliable records, where applicable to their role
* Ensuring electronic records are properly maintained and that they capture core information and remain accessible, readable and authentic
* Ensuring the security of records, irrespective of format, and for ensuring that access to records is only granted to those who are permitted to view them
* Following guidance provided in the Records Disposal Schedule with regard to the retention and disposal of records
* Ensuring records of a sensitive or personal nature are handled appropriately and in accordance with legal requirements
* Supporting efficiency, avoiding duplication and only printing emails and electronic records when absolutely necessary

5.6         Members of staff should receive an introductory briefing on Records Management procedures.

5.7         The Directors should nominate a ‘Records Champion’ to ensure the integration of records management practice throughout the company.

**6.0         Relationship with existing policies**

6. 1       Compliance with this policy will in turn facilitate compliance not only with information related legislation (specifically Freedom of Information Act 2000 and Data Protection Act 1998) but also with any other legislation or regulations (including audit, equal opportunities and research ethics) affecting the company.

**7.0         Storage**

7.1         Records should be appropriately stored with due regard for efficiency, cost-effectiveness, security, durability and access. Appropriate procedures and processes should be put in place to ensure the physical and intellectual security of Company records.

7.2         Storage conditions and handling processes should be designed to protect records from unauthorised access, loss or destruction and from theft and disaster.

7.3         The retention of records for longer than necessary is discouraged and the duplication of records should be limited to optimise the use of space for storage purposes.

**8.0       Disposal**

8.1       Records should be disposed of in accordance with agreed retention schedules.  The retention schedule should be reviewed regularly and adjusted if necessary.  At the expiration of their currency, records should be destroyed securely and certificates retained on file.

**9.0       Available Guidance**

9.1       It is the responsibility of the Directors to provide guidance to all staff on good Records Management practice.

**10.0 Records Retention Schedule**

|  |  |  |  |
| --- | --- | --- | --- |
| **Description**  | **Minimum Retention Period** | **Action** | **Comments** |
| Financial Records | 7 years | Dispose |  |
| Pharmacy Records | 5 years | Dispose |  |
| Personnel Records  | 5 years | Dispose |  |