

Records Management Policy

In this policy:

- ▶ 1 Introduction
- ▶ 2 Statement
- ▶ 3 Definitions
- ▶ 4 Scope
- ▶ 5 Objectives
- ▶ 6 Electronic records
- ▶ 7 Physical records
- ▶ 8 Responsibilities & accountabilities
- ▶ 9 Review

1. Introduction

- 1.1. Information is a corporate asset and the records of the HFEA are important sources of administrative, fiscal, legal, evidential and historical information. They are vital to the organisation in its current and future operations, for the purposes of accountability and for awareness and understanding of its history. They are the corporate memory of the organisation.
- 1.2. In consultation with organisations which may be concerned with the management of its records, the HFEA will create, use, manage and destroy or preserve its records in accordance with all statutory requirements.
- 1.3. Systematic records management is fundamental to the HFEA's organisational efficiency. It ensures that the right information is:
 - Captured, stored, retrieved and destroyed or preserved according to need.
 - Fully exploited to meet current and future needs, and to support change.
 - Accessible to those who need to make use of it.
- 1.4. It also ensures that the appropriate technical, organisational and human resource elements exist to make this possible.

2. Statement

- 2.1. All HFEA staff must ensure that records are created, captured, maintained, secured and disposed of in a way that complies with legal, administrative, cultural and business requirements.
- 2.2. Staff have a duty to protect records and to ensure that any information that they add to them is accurate, complete and necessary.
- 2.3. Staff have a duty to comply with all relevant policies, SOPs and protocols.

3. Definitions

- 3.1. **Information lifecycle.** Process of creating, maintaining, updating, reviewing, archiving and destroying information.
- 3.2. **Metadata.** Data describing context, content and structure of records and their management through time.
- 3.3. **Records.** Those documents required to facilitate the business carried out by the HFEA and retained for a set period to provide evidence of its transactions or activities. Records may be created, received or maintained in a variety of formats, including paper records, microfiche, audio and video cassettes, CDs, DVDs and computer files.

- 3.4. **Records management.** Field of management responsible for the efficient and systematic control of the creation, receipt, maintenance, use and disposal of records.
- 3.5. **Records system.** Information system which captures, manages and provides access to records through time.
- 3.6. **Retention schedule.** A list of the HFEA's record types covering review, preservation and destruction dates and actions associated with these types. Such dates and actions are usually determined by statute, legal, regulatory or business compliance.
- 3.7. **Vital record.** Records without which the HFEA would cease to be able to function properly.

4. Scope

- 4.1. This Policy applies to all the information the HFEA holds – that is all information created, received and maintained by HFEA staff in the course of their work.
- 4.2. This Policy provides a high-level framework for records management in the HFEA. It should be read in conjunction with the HFEA's *Knowledge & Information Management Strategy* (TRIM 2009/000259), *Staff Security Policy & Procedures* (TRIM 2008/01620) and the corporate *Information Access Policy* (TRIM 2009/05338).
- 4.3. The HFEA's records management policy draws from relevant standards and best practice guidance for records management, in particular ISO 15489, the Freedom of Information Act section 46 Code of Practice and Cabinet Office requirements regarding information governance and assurance.
- 4.4. This Policy is supplemented by a number of SOPs, protocols and user guides which complete the HFEA's records management framework. These cover:
 - Classification scheme/file plan (to follow)
 - Retention & disposal schedule (to follow)
 - Archiving SOP (2010/05189)
 - Records destruction SOP (2010/05151)
 - Permanent preservation & records transfer SOP (2010/05193)
 - Records Management and TRIM user manual, including content on naming conventions, version control, scanning, use of email, local drives, shared drives, SharePoint and TRIM (to follow).

5. Objectives

- 5.1. This policy identifies eight primary objectives.
- 5.2. **Compliance.** Records are appropriately created and maintained in accordance with other policy and legislative requirements.
- 5.3. **Accountability.** All HFEA staff at all levels take responsibility for the creation and maintenance of records pertaining to all functions, processes, activities and transactions of the HFEA. This will enable the organisation:
 - 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.
- 5.4. **Quality.** Records are complete and accurate and the information they contain is reliable and its authenticity can be guaranteed. Approved records management practices are consistent and at a suitable standard throughout the HFEA, capable of supporting all activities of the organisation.
- 5.5. **Accessibility.** 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
- 5.6. **Security.** Records will be secure from unauthorised or inadvertent alteration or erasure, 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.
- 5.7. **Archiving, retention and disposal.** Consistent and documented archiving, retention and disposal procedures are implemented to include provision for permanent preservation of archival records.
- 5.8. **Training.** All staff are made aware of their record-keeping responsibilities through generic and specific training programmes and guidance.
- 5.9. **Performance measurement.** The application of records management procedures is regularly monitored and action will be taken to improve standards as necessary.

6. Electronic records

- 6.1. The HFEA's preference is to store records as electronic computer files, in so far as this is compliant with codes of practice regarding the evidential weight and legal admissibility of information stored electronically.
- 6.2. The HFEA's principal storage system is TRIM, an electronic document and records management system.
- 6.3. The use of TRIM ensures that:
 - **The record is present:** The HFEA has the information that is needed to form a reconstruction of activities or transactions that have taken place.

- **The record can be accessed:** It is possible to locate and access the information and display it in a way consistent with initial use.
 - **The record can be interpreted:** It is possible to establish the context of the record – who created the document, during which business process and how the record is related to other records.
 - **The record can be trusted:** The record reliably represents the information that was actually used in or created by the business process and its integrity and authenticity can be demonstrated.
 - **The record can be maintained through time:** The qualities of accessibility, interpretation and trustworthiness can be maintained for as long as the record is needed, perhaps permanently, despite changes of formats.
- 6.4. The HFEA's records management procedures will rely primarily but not exclusively on the use of TRIM and SharePoint. Dependent on business functions, staff may also be required to maintain records in content management, financial management, HR, case management, regulatory and statutory systems (e.g. the HFEA register of treatments and outcomes, the register of licensed centres or the register of adverse serious events and reactions).
- 6.5. All HFEA staff will receive training on TRIM and SharePoint, and are expected to use these systems as core business tools.

7. Physical records

- 7.1. The use of physical records should be kept to a minimum, and used principally for personal reference purposes.
- 7.2. Electronic versions of all physical records should be stored in TRIM.
- 7.3. Records of decisions, contracts and/or committee minutes that require physical signatures should be scanned and stored in TRIM.
- 7.4. Staff must comply with the HFEA's *Clear-Desk Policy* (2010/05162) and maintain a centralised log of all physical records holdings kept either in pedestals or filing cabinets.
- 7.5. Some physical records may be transferred to a third-party organisation when review is triggered by enforcement of the HFEA's retention and disposal schedule.
- 7.6. No records containing personal data should be destroyed or transferred without the express authorisation of the Senior Information Risk Owner (SIRO). SIRO approval should also be sought where bulk destruction of records is proposed, regardless of whether these contain personal data or not.

8. Responsibilities & accountabilities

- 8.1. The **Chief Executive** has a duty to ensure that the HFEA complies with the requirements of legislation affecting management of the records and with supporting regulations and codes.
- 8.2. The **Head of Corporate Quality Projects** will work closely with the Senior Management Team, Legal Advisers and Heads of Department to ensure that records and information systems in their areas conform to this policy and to the requirements of legislation.
- 8.3. **Information Asset Owners** will be responsible for ensuring that records management operates within their directorate.
- 8.4. The **Senior Information Risk Owner** will have oversight of requests to destroy or transfer HFEA records.
- 8.5. **All HFEA staff** are responsible for documenting their actions and decisions and for maintaining records in accordance with good records management practice.

9. Review

- 9.1. This policy will be reviewed on an annual basis.
- 9.2. Ad hoc reviews will take place where relevant primary or secondary UK legislation is introduced, where codes of practice are updated, and where case law requires.

Doc Name and Reference number:	Records Management Policy (RM Pv5)
TRIM number:	04/31
Latest Version No:	5.1
Release date:	19 October 2010
Author:	Richard Martin, Head of Corporate Quality Projects
Approved by:	Corporate Management Group
Next review due:	1 September 2011
Total pages:*	6

Version/revision control

Version	Changes	Updated by	Approved by	Release date
5.0	Policy refresh. Updated as part of Records Management Project 2010.	Richard Martin	CMG	16/09/10
5.1	Minor amendments to bullet list in s.4.4.	Richard Martin	n/a	19/10/10