

INFORMATION GOVERNANCE RECORDS MANAGEMENT GUIDANCE NOTE NUMBER 004 : COMPILING A RECORDS INVENTORY

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Background

The Scottish Government Records Management NHS Code of Practice (Scotland) Version 2.0 makes reference to the need for each NHS organisation to establish and maintain mechanisms through which departments can register records and media containing business or personal identifiable information they are maintaining. The Code of Practice makes reference to the need for Boards to provide a managerial focus for records of all types in all formats, including electronic records, throughout their life cycle, from planning and creation through to ultimate disposal. The term Records Lifecycle Management describes the life of the record from its creation or receipt in the organisation, throughout the period of its active use, then into the period of inactive retention, (such as closed files which may still be required for reference) and then finally when it is disposed of by either confidential destruction, or permanent preservation in an archival facility.

A crucial component of NHS Information Governance is knowing what records are held, where they are kept, who the data controller is and how the information contained within the record is being used. Compiling a records inventory will enable an NHS Board to proactively and consistently manage its records and ensure that information is available at the point of need. It will also assist the NHS Board to ensure they meet statutory obligations and standards in respect of:

- Data Protection Act (1998)
- Freedom of Information (Scotland) Act 2002
- Records Management NHS Code of Practice (Scotland) 2010
- Information Governance Standards (Scotland)
- Professional Guidelines e.g. Royal College of Physicians guidance on record keeping standards

The records inventory assists NHS Boards to achieve compliance with the Information Governance standards by:

- Identifying responsible record holders or owners;
- Identifying information sharing arrangements within the NHS and externally;
- Identifying whether records are held electronically or on paper;

- Enabling records collections to be mapped to records retention schedules to ensure compliance and that where appropriate out of date or replicated records are destroyed;
- Identifying training needs and enabling the organisation to respond, thereby ensuring that staff responsible for records management possess appropriate knowledge and skills;
- Identifying storage pressures and inappropriate storage conditions, thereby allowing corrective action to be taken;
- Identifying deficiencies in security arrangements for records, both manual and electronic.

Purpose and Scope

This document directs the principles and practice for compiling a records inventory. The guidance explains what is meant by a records inventory, reaffirms why it is important for organisations to establish an inventory and describes how this can be achieved.

NHS Board Responsibilities

The Chief Executive Officer has overall accountability for ensuring that records management operates legally within the Board.

The Caldicott Guardian works in liaison with the organisation's Health Records Manager(s), Information and Communications Technology (eHealth) Manager(s), Information Governance Manager and others with similar responsibilities, to ensure there are agreed systems for managing confidentiality and security of information and records in the organisation. All NHS staff should be aware of their personal responsibilities in respect of records management.

The importance and benefits of compiling a records inventory are recognised and supported by the organisation's Executive Board. The Board's Information Governance Steering Group or a sub-group working under terms of reference set by the Information Governance Steering Group are responsible for compiling the inventory.

Key Points for Action by NHS Boards

1. A Director is identified with accountability for establishing and maintaining a records inventory within each NHS board.
2. The Boards Information Governance Steering Group or a sub-group working under terms of reference set by the Information Governance Steering Group are responsible for ensuring that the records inventory is compiled.
3. A records inventory is compiled via establishing processes to:
 - undertake a records survey
 - create a records system/collection register
 - confirm and update details of each record system/collection entry

Compiling a Records Inventory

In this document the term records inventory has been used to describe a catalogue which holds details of all the records systems/collections, both health and administrative, which are in existence within the NHS Board, regardless of the format or media of those records.

When established the records inventory will keep track of all records which are held within the Board, so that they can be located and managed effectively in order to provide safe and effective healthcare and to meet legal and statutory obligations in respect of Data Protection, Freedom of Information and other legislation.

Many of the difficulties associated with capture of data relating to the various records systems/collections can be overcome with careful planning of the records survey. The process for conducting the survey and compiling the records inventory should follow a number of logical steps.

Stage 1 Planning

Compiling a complete records inventory is a significant work stream within an NHS Board, given the range and volume of records, the multiplicity of locations, staff and media involved in creating, retrieving, reproducing, using, sharing, storing and destroying records.

The process of undertaking the records survey and compiling the inventory will be a gradual process and will require good organisation and planning in order to secure the commitment and support of all staff.

A practical way to compile an inventory is to do it in steps or stages e.g. by targeting specific directorates, departments or locations until all records have been covered. An alternative approach is to target specific record types such as is defined in the Department of Health Records Management : NHS Code of Practice. See Figure over:

Example of a stepped approach to compiling a records inventory

By record type* (alternative option could be by department/ location)

* As defined in the Records Management: NHS Code of Practice – See Appendix B

		Record Cat.		Type	
Step 6	15	Other		Non-Health Records	
	14	IM&T			
	13	Estates			
	Step 5	1	Purchasing &		
		2	Supplies		
		1	Administration		
1					
Step 4	10	Human Resources			
	9	Finance			
Step 3	8	Research Project records		Health Records	
	7	Electronic records replicating PAS e.g. waiting and clinic lists			
	6	Standalone clinical systems			
Step 2	5	Clinical systems (PAS fed)			
	4	Patient Administration Systems (PAS)			
Step 1	3	Scanned, microfilm records			
	2	Admission, day, ward books, diaries, index cards			
	1	Paper health records			

In order to achieve optimum effect you should:

1. Form a working group to be responsible for compiling the records inventory. This should be chaired by the Executive Director responsible for Records Management.
2. Identify scope and extent of the records survey (consider which record systems will be surveyed and in which order).
3. Develop a plan and timetable taking account of the various records systems both health and administrative. The plan should include a schedule of which records and departments will be surveyed, by whom and when. Whenever possible this schedule should include estimates of the resources needed to complete each task
4. Review and agree survey form and data collection tool. A sample records survey form can be found at Appendix 1. A description of the data items can be found at Appendix 2 . An excel database suitable to record and aggregate the data items from the sample records inventory form can be found at web address.

Stage 2 Communication

In order to secure the commitment of all stakeholders a robust communication plan should be put in place and you should contact all managers and staff to explain the inventory process and how they will benefit. This should include:

- Purpose and objectives of survey
- Need to include all their records systems, manual and electronic (It is important to understand where and how all records are used and stored. Managers should therefore be asked to record details of all records systems they are responsible for, even if they think they may be duplicating information provided by another directorate or department)
- Explanation of survey form and arrangements for distribution, completion and submission
- Process for updating records inventory
- Process for periodic review of the inventory to identify new or omitted record collections to ensure the inventory remains up to date.

Stage 3 Undertaking the Records Inventory Survey

There are two ways of undertaking a records systems survey – assessment of the whole organisation by a dedicated team or completion of the records inventory survey form by individual directorates or departments. The appropriate method will depend upon the resource available and the level of understanding and commitment available from directorate and departmental staff.

A physical survey requires staff to visit operational areas, to look at records systems, ask questions and complete the survey form. Whilst this model is a thorough method of compiling the inventory, it requires manpower resource to form the team and planning to undertake the survey throughout the organisation. It is desirable that the team comprises of staff from other disciplines as well as experienced records practitioners as this helps to raise awareness of records management as well as provide mentoring and supported training in records practice. The team will also benefit from staff with local knowledge of each directorate or department.

The use of a circulated survey form relies on individual directorates and departments completing their return accurately and in a timely manner. The construction of the survey form must be considered carefully and explanatory notes or training provided to enable directorates and departments to accurately complete their return. Whilst this method provides a rapid and cost effective approach to gathering the survey data, greater coverage is likely to be achieved through physical observation. In some instances a mixture of the two approaches may produce the best effect.

Stage 4 Completing the Inventory Forms

A batch of records inventory survey forms should be sent to each directorate or departmental manager responsible for managing the various record collections. Forms can be sent electronically or by hard paper copy, along with relevant guidance notes, details of closing date for return and contact details of the Records Management Lead or other co-ordinating officer for return of forms, or to answer queries.

Stage 5 Compiling the Records Inventory

The Records Management Lead or designated officer should enter each record system/collection survey form in to a unified corporate inventory after allocating each system with a unique identification number. A sample electronic records inventory database can be found at [here](#). This will also allow subsequent analysis of the data. Any duplicated or replicated record collections identified should be reviewed to establish appropriateness of maintaining multiple records.

Stage 6 Confirming and Updating the Records Inventory

The completed inventory should be regularly reviewed in order that it is kept as accurate as possible. Directorate/Departmental Managers should be asked to confirm details of each inventory entry on an annual basis. A process should be established throughout the organisation which enables directorate/departmental managers to notify the Records Management Lead or designated officer whenever a new records system/collection is created, or where management arrangements change e.g. media storage, physical locations, destruction etc.

References:

Scottish Government : Records Management NHS Code of Practice (Scotland)

Version 2.0

<http://www.scotland.gov.uk/Publications/2008/07/01082955/2>

Information Governance Standards (Scotland)

<http://www.isdscotland.org/isd/4064.html>

Department of Health : Health Records Management : NHS Code of Practice

http://www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH_4131747

Freedom of Information (Scotland) Act 2002: Code of Practice on Records Management

<http://www.scotland.gov.uk/Resource/Doc/1066/0003775.pdf>

NHS Scotland Record System Collection Survey

Appendix 1: Sample Records Survey Form

Please Complete All Questions

0. Date Record Entry Created/ Updated? (Enter Date)	
1. Responsible manager designation	Mr <input type="checkbox"/> Mrs <input type="checkbox"/> Ms <input type="checkbox"/> Dr <input type="checkbox"/> Prof <input type="checkbox"/>
2. Responsible manager's name (Give full name)	
3. Responsible manager's job title (As per HR records)	
4. Record type (Tick one box)	<p>Clinical:</p> <p>General <input type="checkbox"/> Mental Health <input type="checkbox"/> AHP <input type="checkbox"/></p> <p>Nursing <input type="checkbox"/> GP <input type="checkbox"/> Pharmacy <input type="checkbox"/></p> <p>Child Health <input type="checkbox"/> Radiology <input type="checkbox"/> Community <input type="checkbox"/></p> <p>Pathology <input type="checkbox"/> Maternity <input type="checkbox"/> Clinical Psychology <input type="checkbox"/></p> <p>Administrative:</p> <p>General <input type="checkbox"/> Financial <input type="checkbox"/> Human Resources <input type="checkbox"/></p> <p>Environmental, Property, H&S <input type="checkbox"/> Procurement and Stores <input type="checkbox"/></p>
5. Record system/ collection name	
6. Record System location/ Department	
7. Describe information record contains	
8. Does record contain:	<p>Person identifiable data Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Clinical Information Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Business Sensitive information Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>If yes to business sensitive information, please specify type:</p>

15. Does system have a Master Patient Index (MPI)	Yes <input type="checkbox"/> No <input type="checkbox"/> If Yes, select MPI type Dept. Index (Manual) <input type="checkbox"/> Dept. Index (Computer) <input type="checkbox"/> Hospital PAS <input type="checkbox"/> Not Applicable <input type="checkbox"/>
16. Are copy records held	Note: Are copy records held within other record system (i.e. information copied from this record and inserted into another record system)? Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, specify type Clinical: General <input type="checkbox"/> Mental Health <input type="checkbox"/> AHP <input type="checkbox"/> Nursing <input type="checkbox"/> GP <input type="checkbox"/> Pharmacy <input type="checkbox"/> Pathology <input type="checkbox"/> Maternity <input type="checkbox"/> Administrative: General <input type="checkbox"/> Financial <input type="checkbox"/> Human Resource <input type="checkbox"/> Property, Environmental, H&S <input type="checkbox"/> Procurement and Stores <input type="checkbox"/> If yes, please specify record name
17. Is record routinely shared out-with NHS	Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, is there an agreed data sharing protocol? Yes <input type="checkbox"/> No <input type="checkbox"/>
18. Physical records storage-Physical location	Are records held at a team base or sub-location during period of patients active treatment? Yes <input type="checkbox"/> No <input type="checkbox"/> If yes specify location
19. Volume of records held	Give indicative volume <100 <input type="checkbox"/> <1K <input type="checkbox"/> <20K <input type="checkbox"/> <50K <input type="checkbox"/> <100K <input type="checkbox"/> < 200K <input type="checkbox"/> < 300K <input type="checkbox"/> < 500K <input type="checkbox"/> 1 M <input type="checkbox"/> >1 M <input type="checkbox"/>

<p>20. Record storage system used</p>	<p>Specify manual system used</p> <p>Filing Cabinets Static Shelving <input type="checkbox"/> Mobile shelving <input type="checkbox"/> Lectriever <input type="checkbox"/></p> <p>Static Shelving <input type="checkbox"/> Carousel <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Specify electronic system used</p> <p>PC <input type="checkbox"/> In house department data base <input type="checkbox"/> Document management system, re Doc Man; OIT UK etc. <input type="checkbox"/></p> <p>Laboratory Information System PMS <input type="checkbox"/> Administrative Record System <input type="checkbox"/> RIS <input type="checkbox"/></p> <p>HISS <input type="checkbox"/> PAS <input type="checkbox"/> N/A <input type="checkbox"/></p>
<p>21. Method of securing access</p>	<p>Physical:</p> <p>Locks (Keys) <input type="checkbox"/> Key Pad Entry <input type="checkbox"/> Swipe Card Entry <input type="checkbox"/> Not Secured <input type="checkbox"/></p> <p>Electronic:</p> <p>Individual User Log On and Password <input type="checkbox"/> Generic User Log On and Password <input type="checkbox"/> Not Protected <input type="checkbox"/></p>
<p>22. Access to records</p> <p>(Specify who has access)</p>	<p>Admin Staff <input type="checkbox"/> Clinical staff <input type="checkbox"/> Both Admin and clinical Staff <input type="checkbox"/> Other-Specify below <input type="checkbox"/></p>
<p>23. Arrangements for accessing records outside core hours</p>	<p>Specify type of access</p> <p>24 hour Admin Records Service <input type="checkbox"/> Emergency Call Out System <input type="checkbox"/> Access by Other Staff Groups Not Managed by Department. <input type="checkbox"/></p> <p>Electronic In House System <input type="checkbox"/> Electronic- Bespoke (e.g. PAS) <input type="checkbox"/></p> <p>Provide text description</p>

<p>24. Does storage area have sufficient space to accommodate new registrations</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>Give current capacity - Free Number</p> <p>Linear feet Giga bytes</p> <p>If No, how much additional capacity is required (%)</p> <p>Give required capacity</p> <p>Linear feet Giga bytes</p>
<p>25. Is filing area included in current "Health and Safety Control" book</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>If no, specify when it will be included? (Enter Date)</p>
<p>26. Are there any business continuity plans?</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>Specify which systems include bespoke data bases</p>
<p>27. How frequently is record's system accessed</p>	<p>Daily volume of records retrieved/ filed</p> <p>0-49 <input type="checkbox"/> 50-99 <input type="checkbox"/> 100-199 <input type="checkbox"/> 200-499 <input type="checkbox"/></p> <p>500-999 <input type="checkbox"/> 1000- 1999 <input type="checkbox"/> 2000-4999 <input type="checkbox"/> 5000+ <input type="checkbox"/></p>
<p>28. Tracking of Records</p>	<p>System Used</p> <p>No tracking system <input type="checkbox"/> Manual - Book <input type="checkbox"/> Manual Tracker Card <input type="checkbox"/></p> <p>How do you control the movement and tracking of records within or out-with your organisation? Please provide details</p>
<p>29. Packaging of records for transportation</p>	<p>Envelopes <input type="checkbox"/> Envopaks <input type="checkbox"/> Storage Boxes <input type="checkbox"/> Flight Bags <input type="checkbox"/> Other <input type="checkbox"/></p> <p>If other Please Specify:</p>
<p>30. Are users aware of organisation's records management policy</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/></p>

<p>31. Have all staff had training to record keeping practice</p> <p>Have all staff had training on Information Governance and Data Protection.</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>If yes provide details</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>If yes provide details</p>
<p>32. Do you permit records to be taken "away" overnight by staff</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>If Yes, is there a documented procedure which has been endorsed by NHS Board or policy?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/></p>
<p>33. Are records audited on a regular basis</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>If yes, specify period</p> <p>Monthly <input type="checkbox"/> Quarterly <input type="checkbox"/> Twice yearly <input type="checkbox"/> Annually <input type="checkbox"/> Less frequently <input type="checkbox"/></p> <p>If yes, audit tool used</p>
<p>34. Is this record located in a secondary storage facility .</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>If yes is this external with a contract in place?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/></p>

Appendix 2: Records Survey Data Field Descriptions

Data Field Heading	Data Field Description
Date record created/ updated	Enter date record survey form is being completed/ verified or updated.
Responsible manager	Give designation of manager responsible for records system/ collection
Responsible manager's name	Give full name
Responsible manager's job title	Give job title as per Human Resource records
Record type	Select type
Record name	Give description of the name of the records system / collection.
Record System Location/Department	Give details of the location and department where the records are stored
Information record contains	Give details of the data or documents contained within the record
Does record contain...	Select appropriate options If record contains business information specify which type in free text.
Format / media type - Select any combination of media types	Select appropriate options
Method of filing	Select appropriate option to describe how records are filed.
National Minimum Retention Period - Refer to NHS Scotland Records Management Code of Practice	Give minimum number of years from retention schedule.

Agreed Local Retention Period currently applied to record system	Please advise what local retention period is currently applied before records are destroyed.
Disposition after retention has expired?	Select appropriate option
For external disposition is this on contract	Select appropriate option
Record system status	Select appropriate option and give date if records system is inactive i.e. no longer in use.
Does system have a Master Patient Index (MPI)	Select appropriate options
Are Duplicate Records held	Select appropriate options, if yes provide details.
Is record routinely shared outwith NHS	Select appropriate option
If yes, is there an agreed data sharing protocol	Select appropriate option
Physical records storage	Provide details of physical location of records storage system. Please advise if records are held at a team base or sub location during the period of a patients active treatment. If records are held at a sub-location please provide details.
Volume of records held	Select appropriate option
Record storage system used	Select appropriate option
Method of securing access	Select appropriate option
Access to records	Select appropriate option
Arrangements for accessing records outside core hours?	Select appropriate option and provide a free text description to explain process for accessing the records out of hours.
Does storage area have sufficient space to accommodate new registrations?	Select appropriate option and give details of storage capacity and usage.

Is filing area included in the current "health and safety" book	Select appropriate option, If No specify when it will be included.
Are there any business continuity plans	Select appropriate option and provide details
How frequently is record's system accessed	Select appropriate option
Tracking of Records	Select appropriate option and provide details
Transportation of Records	Select appropriate option and provide details. If other, specify transportation method.
Are users aware of organisation's records management policy	Select appropriate option
Have all staff had training on record keeping practice	Select appropriate option, if yes provide details.
Do you permit records to be taken "away" overnight by staff	Select appropriate options
Are records audited on a regular basis	Select appropriate option and provide details of the audit tool used to: <ul style="list-style-type: none"> • determine the quality of clinical content of the records. • the administration of the creation, filing, retrieval, archiving and destruction of the record.
Do you use secondary storage facilities	Select appropriate option and provide details.