

Important:

This document is overdue review and refers to the old Scottish Government Records Management: NHS Code of Practice (2012).

Until an updated version of this document is published, please refer to the new Code of Practice (linked below) particularly the retention periods detailed in Sections 6 and 7.

<https://www.informationgovernance.scot.nhs.uk/wp-content/uploads/2020/06/SG-HSC-Scotland-Records-Management-Code-of-Practice-2020-v20200602.pdf>

If you have any questions about records retention which are not covered by the Code of Practice, please contact the Information Governance Team at:

shet.igt@nhs.scot

RECORDS MANAGEMENT PROCEDURE: NON-CLINICAL RECORDS

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|-----------------------------------------------|---------------------------------------|
| Approved by Senior Management Team: | 10th September 2008 |
| Approved by Information Support Group: | 18th September 2008 |
| Review Date: | April 2018 |
| Responsible Officer: | Corporate Services Manager |

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1. Introduction

The purpose of this procedure is to provide a systematic and planned approach to the management, retention, archiving and destruction of administrative/non-clinical records produced and owned by Shetland NHS Board (the Board).

National guidance on the management of administrative records is set out in Scottish Government Records Management: NHS Code of Practice (Scotland) Version 2.1, January 2012. This supersedes previous guidance issued in CEL 31(2010), CEL 28 (2008) and HDL (2006) 28. This procedure sets out the local policy on the retention and disposal of administrative records across the Board and is based on the Scottish Government Records Management: NHS Code of Practice (Scotland) Version 2.1 January 2012.

Documents which contain information relating to the physical or mental health of a named individual as a result of treatment and care delivered by a health professional are classed as medical records and are included in the Procedure for the Retention and Destruction of Personal Health Records.

2. Retention, destruction and transmission of records

The periods given in this document for retention are a minimum guideline only and should be applied at the discretion of the Head of Department. Recommended minimum retention periods should be calculated from the end of the calendar or accounting year following the last entry on the document.

Documents of historical importance should be retained indefinitely and not destroyed. All records retained for storage should be clearly labeled and filed in an orderly fashion to facilitate timely retrieval. Storage must be in a secure environment.

The Caldicott Guardian, Data Protection Officer and Medical Records Manager are responsible for ensuring compliance. Further information regarding the classification of records can be obtained from the Information Manager or Medical Records Manager.

Paper Records

Documents for destruction must either be shredded or placed in waste bags and taken to the community incinerator by a responsible person from the department of source at the discretion of the Head of Department.

Records should never left unattended in public or unsecured areas and should be stored in locked metal filing cabinets.

Department access should be via a secure entry system. Access to departments and the records stored therein, should be granted by the Head of Department.

Out of hours access to records requires approval by Head of Department. This is then arranged following departmental procedures and will be facilitated by the porters, where required.

Patient identifiable information should only be transmitted by fax only in agreed circumstances via safe haven arrangements.

Confidential records should be mailed using recorded delivery.

Re-usable internal envelopes must never be used to send confidential information.

Records should be filed appropriately for timely retrieval.

Electronic Records

Only authorised users of individual departmental systems may access electronic information systems. These systems should be password protected, with passwords regularly changed and not shared.

Access to departmental systems is granted according to the duties and level of responsibility of the individual user, with the level of access agreed by the Head of Department and the IT Manager.

Confidential information must not be left unattended on a computer screen.

Each department holds an up to date register of authorised signatories.

Patient identifiable information should only be transmitted via secure e-mail addresses or using encryption to all other e-mail addresses.

Confidential information must only be passed by telephone to an identifiable named person with a “need to know” and should never be left on an answering machine or mobile phone answering service.

Further information on this can be found in the Information Security Policy, IT Security Policy and Personal Information Sharing Policy.

The following pages set out minimum periods for which the various administrative records created within the NHS or predecessor bodies should be retained (in line with the Principle 5 of The Data Protection Act 1998), either due to their ongoing administrative value or as a result of statutory requirement. They reflect the guidance described in [Annex C](#) of the Scottish Government Records Management: NHS Code of Practice (Scotland) Version 2.1 January 2012.

Records are listed alphabetically within each record category, e.g. financial, human resources. The retention schedules apply to all the records concerned, irrespective of the format (e.g. paper, databases, emails, photographs, CDRoms) in which they are created or held.

3. General

| Record Type | Minimum Retention Period | Notes |
|------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Conferences: lectures given by staff at other conferences | Permanent | Significant conference papers should be selected for permanent retention |
| Conferences: organised by Boards - conference proceedings | Permanent | |
| Conferences: organised by Boards - routine paperwork | Destroy after conference | |
| Conferences: other conferences attended by staff | 2 years | |
| Copies of out-letters | 1 year | |
| Databases- records handling system | Permanent | Retain to demonstrate implementation of established practice and provide audit trail, see also Indexes |
| Diaries - office | 1 year after completion | |
| Enquiries (such Subject Access Request and FOISA) | Minimum of 40 working days following the response; requests for review for a minimum of six months | The authority may wish to keep the correspondence longer for its own business purposes |
| Indexes- file and document lists marked for permanent preservation | Permanent | |
| Indexes- file and document lists not marked for permanent preservation | Destroy when no longer useful | Retention may be required if they are part of audit trails |
| Quality Assurance Records | 12 years | |
| Receipts for registered and recorded delivery mail | 2 years | |
| Records of custody and transfer of keys | 2 years | |
| Research and development findings by Board staff (scientific, technological and medical) | Consider findings and reports for permanent preservation | Supporting records should be retained in line with the appropriate clinical, pharmaceutical, laboratory or other research standards, as set out by funding and professional bodies. |
| Software licenses | Operational lifetime of product | |

4. Finance

| Record Type | Minimum Retention Period | Notes |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------|------------------------------------------------------------|
| Accounts - cost | 3 years | |
| Accounts - working papers | 3 years | |
| Accounts - minor records: (including pass books, paying-in slips, cheque counterfoils, cancelled/discharged cheques, petty cash expenditure, travelling and subsistence accounts, minor vouchers, duplicate receipt books, income records, laundry lists) | 3 years after completion of audit | See 'Receipts for cheques bearing printed receipts' below |
| Accounts - statutory final | Permanent | |
| Advice Notes | 3 years after formal clearance by statutory auditor | A longer period may be required for investigative purposes |
| Audit records - original documents | 3 years after formal clearance by statutory auditor | A longer period may be required for investigative purposes |
| Audit reports (including Management letters, VFM reports and system/final accounts memorandum) | 3 years after formal clearance by statutory auditor | A longer period may be required for investigative purposes |
| Bank statements | 3 years after completion of audit | |
| Benefactions - endowments, legacies gifts etc. | Permanent | |
| Bills and receipts | 6 years | |
| Budget monitoring reports | 3 years | |
| Budgets | 2 years after completion of audit | |
| Capital paid invoices | 3 years | See 'Invoices' below |
| Cash books and sheets | 6 years | |
| Cost accounts | | See 'Accounts' above |
| Creditor payments | 3 years | |
| Debtors' records - cleared | 6 years | |
| Debtors' records - uncleared | 6 years | |
| Demand Notes | 6 years | |

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| Expenses claims | | See 'Accounts - minor' above |
| Financial plans, estimates recovery plans | 6 years | |
| Funding data | 6 years | |
| General ledgers | 6 years | |
| Income and expenditure sheets and journals | 6 years | |
| Indemnity Forms | 6 years after the indemnity has lapsed | |
| Inquiries involving fraud/other irregularities | 10 years | Where action is in prospect or has been commenced, consult with legal representatives and NHS Counter Fraud Services and keep in accordance with advice provided |
| Invoices payable (creditors) | 6 years | |
| Invoices receivable (debtors) | 6 years | |
| Ledgers | 6 years | See also 'General ledgers' above |
| Mortgage documents - acquisition, transfer and disposal | Permanent | |
| Non-exchequer funds records | | See 'Income and expenditure journals' above |
| PAYE records | 6 years | |
| Receipts | 6 years | Includes cheques bearing printed receipts |
| SFR returns | 6 years | |
| Superannuation - accounts and registers | 10 years | |
| Superannuation - forms | 10 years | |
| Tax forms | 6 years | |
| VAT records | 6 years | In some instances a shorter period may be allowed, but agreement must be obtained from HM Revenue and Customs |
| Wages/salary records | 10 years | For superannuation purposes authorities, may wish to retain such records until the subject reaches pensionable age |

The Scottish Government policy on retention of financial records is set out in the Scottish Public Finance Manual, which can be accessed at:
<http://www.scotland.gov.uk/library5/finance/spfm/spf-00.asp>

5. Property, Environment and Health & Safety

| Record Type | Minimum Retention Period | Notes |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------|--------------------------------------------------------------------------------|
| Agreements | See 'Contracts' below | |
| Buildings - papers relating to occupation | Permanent or until property demolished or disposed | Does not include Health & Safety information |
| Capital charges data | 3 years after completion of previous 5 year valuation term | |
| Contaminated Land | Permanent | |
| Contracts - non sealed (property) on termination | 6 years | |
| Environmental Information | Permanent | |
| Equipment | | See 'Products - liability' under 'Procurement Records' |
| Estimates: including supporting calculations and statistics | 3 years | |
| Green code | Permanent | |
| Health and safety: Asbestos Register | Permanent | |
| Health and safety: Audit forms, COSHH (Control of Substances Hazardous to Health Regulations) documentation, safety risk data sheets, risk assessments and control measures etc. | 10 years | |
| Health and Safety: Accident and Incident Forms | 10 years | See 'Litigation dossiers' under 'NHS Board Records' |
| Health and Safety: Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR) including Accident Register | 10 years | |
| Inspection Reports - e.g. boilers, lifts etc. | 2 years after operational lifetime of installation/plant | Should be retained indefinitely if there is any measurable risk of a liability |
| Inventories (non-current) | 2 years | |

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| of items having an operational lifetime of less than 5 years | | |
| Land purchase and sale - deeds, leases, maps, surveys, registers etc | Permanent | |
| Land purchase and sale - negotiations not completed | 6 years | |
| Laundry lists | | See 'Accounts - minor' under 'Financial Records' |
| Manuals - operating | | See 'Inspection reports' above |
| Manuals- policy and procedure | Permanent | |
| Maintenance contracts | | See 'Property-Cleaning and Maintenance' below |
| Maintenance request book | 2 years after financial year referred to | |
| Maps | Consider for permanent preservation | |
| Project files (£250,000 and over) | Permanent | Including abandoned or deferred projects |
| Project files (under £250,000) | 6 years after completion/abandonment of project | |
| Project team files (£250,000 and over) | 3 years | |
| Project team files (under £250,000) | 3 years | |
| Property- acquisition dossiers | Permanent | |
| Property - cleaning and maintenance (contracts less than £100,000) | 6 years | |
| Property - disposal dossiers | Permanent | |
| Property/Estates- Land, Building and Engineering Construction Procurement: Key records (including: final accounts, surveys, site plans, bills of quantities, PFI/ PPP records) | Permanent | Inclusive of major projects abandoned or deferred |

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| Town and country planning matters and all formal contract documents (including: executed agreements, conditions of contract, specifications, "as built" record drawings and documents on the appointment and conditions of engagement of private buildings and engineering consultants) | | |
| Property - leases | Permanent | |
| Property management system | Permanent | |
| Property - minor contracts | 6 years | |
| Property performance | Permanent | |
| Property - purchases | Permanent | |
| Property strategy | Permanent | |
| Property - title deeds | Permanent | |
| Property- terriers (NHS premises site information) | Permanent | |
| Safety Action Bulletins | Permanent | |
| SEPA Registrations, Licenses and Consents | Permanent | |
| Specifications for work tendered | 6 years | |
| Tenders (successful) | | See 'Contracts' above |
| Tenders (unsuccessful) | 6 years | |
| Waste Consignment Notes- Controlled wastes such as clinical/healthcare and household/domestic | 2 years | |
| Waste Consignment Notes- Special/Hazardous/Radi oactive Wastes | 3 years | |
| Waste- Duty of Care Inspection Reports | Permanent, or for life of external contract | |

6. Human Resources

| Record Type | Minimum Retention | Notes |
|------------------------------------------------------------------------------|---------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Disciplinary: First written warning | 6 months | |
| Disciplinary: Final written warning | 12 months | |
| Disciplinary: First and final written warning | 12 months | |
| Disciplinary: Letter of Dismissal | 10 years | Where action is in prospect or has been commenced, consult with legal representatives and keep in accordance with advice provided. |
| Disciplinary: Records of action taken, including: Details of rules breached, | 6 years after leaving service | See above for retention periods for warnings. |
| Establishment records - major | 6 years after leaving service | |
| Establishment records - minor (including: attendance books, annual | 2 years | |
| Industrial relations (not routine) | Permanent | |
| Personal Development: Nurses - training records | 30 years after completion of training | Applies only to Nurse Training carried out in hospital based nurse training schools |
| Personal Development: Study leave applications | 2 years | |
| Recruitment: Applications for employment - unsuccessful | 1 year after completion of | |
| Recruitment: CVs for non-executive directors (successful) | 5 years following end | |
| Recruitment: CVs for non-executive directors (unsuccessful applicants) | 2 years | |
| Recruitment: Disclosure Scotland information | 90 days | 90 days after the date on which recruitment or other relevant decisions have been taken; or 90 days after the date on which recruitment or other relevant decisions have been taken. |
| Recruitment: Job advertisements | 1 year | |

7. Procurement and Stores

| Record Type | Minimum Retention | Notes |
|------------------------------------------------------------------------------------------|------------------------------------------|-----------------------------------------------------------------------------------------|
| Approval files - contracts | Permanent | |
| Approved suppliers lists | 11 years | |
| Delivery notes | 2 years | |
| Indents | 2 years after financial year referred to | |
| Medical equipment specifications - major items purchased | Permanent | |
| Medical Equipment - operating manuals | operational lifetime of equipment | |
| Procurement documentation | 7 years | One copy of each supplier response from short listed to tender and the contract itself. |
| Products - liability | 11 years | |
| Purchase orders | 3 years after financial year referred to | |
| Requisitions | 2 years after financial year referred to | |
| Stock control reports | 2 years | |
| Stores - major (ledgers etc.) | 6 years | |
| Stores - minor (requisitions, issue notes, transfer vouchers, goods received books etc.) | 2 years | |
| Supplier correspondence | 6 years after termination of agreement | |
| Supplies records - minor (e.g. invitations to tender and inadmissible tenders, routine | 2 years | |

8. NHS Board

| Record Type | Minimum Retention Period | Notes |
|-----------------------------------------------------------------------------------|--------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Area health plans | Permanent | |
| Contracts - non sealed on termination | 6 years | |
| Contracts - GP Practices and others to deliver core NHS services | Permanent | |
| Contracts - sealed | Permanent | Including associated records |
| Corporate policies | Permanent | |
| Deeds of title | Permanent | |
| Health promotion - core papers and visual materials relating to major initiatives | Consider permanent preservation | |
| History of Boards or their predecessor organisations | Permanent | |
| History of hospitals | Permanent | |
| Hospital services files | Consider permanent preservation | |
| Legal actions (adult) | 7 years after case settled or dropped | |
| Legal actions (child) | Until child is 18 or 7 years after case settled or dropped, whichever is later | |
| Litigation dossiers - complaints including accident reports | 10 years | Where a legal action has commenced see Legal actions |
| Meeting papers - master set | Permanent | Main committees and sub-committees of NHS Boards and special Health Boards and other meetings of significance for legal, administrative or historical reasons |
| Minutes - master set | Permanent | Main committees and sub-committees of NHS Boards and special Health Boards |
| NHS circulars - master set | Permanent | |
| Nursing homes pre 1 April 2002: registration documents and building plans | Permanent | The regulation of care services was taken over by the Care Commission on 1 April 2002. |

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| Nursing homes pre 1 April 2002: inspection reports and general correspondence | 5 years | The regulation of care services was taken over by the Care Commission on 1 April 2002. |
| Option appraisals | 6 years after end of agreement | |
| Patient complaints without litigation - adults | 7 years | |
| Patient complaints without litigation - children and young adults | Until child is 16 or 7 years, whichever is later | |
| Photographs | Consider for Permanent preservation | Corporate and publicity photographs, those not used for patient care purposes. |
| Press cuttings | Consider for permanent preservation | |
| Register of seals | Permanent | |
| Reports - major | Permanent | |
| Serious incident files | Permanent | |
| Service development reports | 6 years | |
| Service level agreements | 6 years | |
| Strategic plans | Permanent | |
| Subject files | Permanent | Files relating directly to the formulation of policy and major controversies must be permanently preserved. Other files should be disposed of when no longer needed. |
| Trust arrangements legally administered by NHS organisations - documents describing terms of foundation/establishment and winding-up | Permanent | |
| Trusts arrangements legally administered by NHS organisations - other documents | 6 years | |

9. Service Planning

| Record Type | Minimum Retention Period | Notes |
|---------------------------------------------------------------------------------------------------------------------------|--------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Activity monitoring reports | 6 years after end of agreement | |
| Admission, transfer and treatment of patients - policy files | Permanent | |
| Databases - demographic and epidemiological based on data supplied by NHS National Service Scotland, Information Services | | In accordance with general policies of NHS National Service Scotland, Information Services, and any specific terms and conditions imposed by them in relation to particular data sets |
| Databases - demographic and epidemiological based on survey data | | May be retained indefinitely if data quality and potential for future re-use justifies cost of migration/regeneration to new formats and platforms |
| Patient activity data | 3 years | |
| Summary bed statistics | Permanent | |
| Waiting list monitoring reports | 6 years | |
| Seasonal business plans | 6 years | |

10. Audit and Training

Audit

An annual audit will be undertaken by each department to ensure compliance with Shetland NHS Board policy.

Audit reports will be considered by the eHealth and Information Governance Support Group.

Training

All staff will be given an introduction to records management with their induction package and mandatory refresher training.

All new recruits to the organisation will be made aware of the Shetland NHS Board policy and procedure manual and the need to be familiar with the contents.

Staff will receive further training at the discretion of their Head of Department.

Training needs will be identified through annual appraisals and recorded on Personal Development Plans.

Training given will be documented in individual training records held in the Staff Development Department.

Staff will be made aware of the introduction of new legislation at Team Briefs.

11. Data Protection and Caldicott

Data Protection

All staff with access to records must be aware of and comply with the eight principles of good practice contained in the Data Protection Act 1998.

Data must be:

1. Fairly and lawfully processed;
2. Processed for limited purposes;
3. Adequate, relevant and not excessive;
4. Accurate;
5. Not kept longer than necessary;
6. Processed in accordance with the data subject's rights;
7. Secure;
8. Not transferred out of the country without adequate protection.

The Data Protection Officer for Shetland NHS Board is Colin Marsland, Director of Finance.

Caldicott

The Caldicott Committee was set up to review confidentiality issues arising from the transport of patient identifiable data within and between organisations.

The Caldicott report recommended that there should be a network of Caldicott Guardians of patient information throughout the NHS.

The report identified six general principles of confidentiality.

Six Caldicott Principles:

1. Justify the purpose(s) for using confidential information;
2. Do not use patient identifiable information unless absolutely necessary;
3. Only use the minimum necessary;
4. Access on a strict need-to-know basis;
5. Individuals with access must understand own responsibilities;
6. Understand and comply with the law.

The Caldicott Guardian for Shetland NHS Board is Dr. Gilbert Ozuzu, Medical Director.

Sources of information:

Data Protection Act 1998.

The Caldicott Report 1997.

Last Updated: December 2017