

Record Disposal

RECORDS MANAGEMENT HANDBOOK

GUIDANCE TITLE:	05: Disposing of Records
GUIDANCE PURPOSE:	How to decide if records can be disposed of and how to do it.
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Question: What is record disposal?

Answer: Final action you take with a record at the end of its lifecycle

Disposing of records means either:

- The permanent destruction of records; or,
- The transfer of records for permanent preservation (archiving).

The disposal of records/ documents should take place according to either:

- Instructions given in the Records Retention and Disposal Schedule; or
- Documents- In line with 'Normal administrative practice.'

Question: What does disposing of documents as part of 'normal administrative practice' mean?

Answer: These are records which do not have corporate value or legal requirements

The majority of information types not covered by the Records Retention and Disposal Schedule can be destroyed as a document under 'normal administrative practice.' If there is any doubt staff should check with managers or contact the Information Governance Team (see contact details).

NB: Remember- It's too late to do anything once a record has been destroyed!!!

Documents destroyed within this category will usually be duplicates, unimportant (no long term corporate value) or only required for short term use. The following types can usually be destroyed as part of 'normal administrative practice':

- Superseded/ old versions of manuals/ instructions (1 master set which includes the old version needs to be kept by the creator/ receiver);
- Catalogues and trade journals;
- Information copies of press cuttings, statements, publicity material;¹
- Working drafts of reports, draft correspondence, (this does not necessarily include draft policies/ procedures);
- Abstracts or copies of formal financial records maintained for reference;
- Routine email or telephone messages e.g. *Mr X rang please call back*;
- Meeting requests once the meeting has been logged or occurred.

Question: How do I use the Records Retention & Disposal Schedule?

Answer: Work from the top level function (what you do), down to the individual record types

If records do not fall into the 'normal administrative practice', the [Records Retention and Disposal Schedule](#) should be consulted when considering record disposal. The schedule is split into top level business functions (what organisations do, e.g. Human Resources); then by the records aligned to those functions.

Assigned to record types will be a minimum retention period and where possible the authority from this period comes from. This period defines the minimum amount of time the Trust MUST retain the information.²

Question: How do I destroy records effectively?

Answer: By ensuring confidentiality is retained at all times and they are secure

Trust records can only be destroyed once all legal, administrative, business and archival retention requirements have expired or been taken into account. To protect the Trust and the public, records must be destroyed in an appropriate and secure manner. Failure to ensure the total or secure destruction of records may lead to the unauthorised release of sensitive or confidential information.

¹ The Communications Department may keep a scrap book of important articles.

² This is a minimum period- if staff believe a record should be kept for longer, e.g. for business purposes they should discuss this with the IG Team.

General administrative information or non-confidential records can be disposed of in recycling/ general waste bags, but sensitive/ confidential information must be disposed of confidentially, so there is no possibility of information being located and unlawfully disclosed. This would mean the use of Trust confidential waste bags.

Question: How do I decide which records are sensitive/ confidential?

Answer: Consider the content of the records

The format of the record has no impact on whether a record is sensitive or confidential; it is purely dependent on the content.

What is personal?

*Any record that contains personal information about a living individual. The following list is just a few of the records that could be considered personal.

- Questionnaire or data collection asking for address, date of birth etc...;
- Correspondence which includes contact details (this can include home or email address), or financial information for example;
- Personnel (HR) Records;
- Interview Notes;
- Job applications/ CVs;
- Handover notes;
- Clinical Diaries.

What is confidential?

It is important to consider records that may have commercial sensitivity, or if we may breach confidentiality by destroying them inappropriately, e.g. is there a contract clause? Some information is available under Freedom of Information; however, it can be dependent on the stage the contract or tenders are at. If there is a chance of commercial sensitivity the records should be destroyed in an appropriate manner.

Under Freedom of Information or Data Protection Legislation and as good practice it may be necessary for the Trust to prove the destruction of a certain record has been carried out in line with Policy and on what date. This is largely to do with accountability and to prove our actions were legitimate.

Question: What do I do if I believe a record(s) can be destroyed?

Answer: Fill in a 'records disposal form' and gain approval

When staff deems a record(s) can be destroyed they should follow these steps:

1. Complete a Records Disposal Form; ensuring all sections are completed; for all records. A template is available in appendix 1 and on the Trust Intranet.
2. Gain authorisation for the records disposal from a line manager.
3. Destroy the records in a secure and appropriate manner.
4. Retain the disposal form in a safe location. This may be routinely asked for by the Information Governance Team or as part of an Audit. It may also be needed as evidence of record destruction for Freedom of Information requests.

Question: How do I dispose of records?

Answer: In a manner which is suitable to the information contained.

Paper: It is important to identify records that contain any personal information about members of staff or public, or other confidential information such as commercial sensitive records. For records that have no confidentiality issues, then the general waste bags can be used. For records that contain confidential information Trust confidential waste device must be used- must be sealed once full and collection arranged.

Electronic/ External media, e.g. CDs:

ICT will be able to provide advice on the appropriate destruction on electronic records and external media- do not dispose of anything without consulting with them. Please contact the ICT Service Desk to discuss this.

Contact Details/ Further Information

If you have any question regarding the creation/ receipt of files please contact:

Information Governance Lead (*Information Governance Team*)

- Email: InformationGovernance@uhb.nhs.uk

APPENDIX 1

Record Destruction Form

Trust records may only be destroyed after they have met the minimum retention period set out in the trust's records retention and disposal schedule.

Only the chief executive, director or a department/ team manager (or equivalent) can authorise the destruction of trust records by signing a completed records destruction form.

If the answer to any of the following questions is **yes**, the record(s) listed must be retained.

Are the records still required for any of the following purposes?

- Administrative requirements e.g. are the records still required to support the business activities of the trust?
- Legal requirements e.g. are the records required for, or relate to, current legal proceedings?
- Audit requirement e.g. do the records relate to an activity which is in the process of being audited?

Records Destruction Authorisation

The following records have met their minimum retention requirements under the trust's retention and disposal schedule and are no longer required to be retained:

Department / Team:	
Name / Position of Authoriser:	
Date:	
Signature:	

File number (if applicable)	Description of record(s)	Inclusive dates	Date destroyed
<i>Add rows as needed</i>			

Guidance notes for completing the form

1	<p>The file number is a unique reference that departments / teams may apply to their records if a referencing system is in place.</p> <p>e.g. <i>SMG12/05</i></p> <p><i>PO1/8/9 - PO1/8/29</i></p>
2	<p>The description of record(s) is a summary description of the record(s) to be destroyed. The description should be concise but detailed enough so:</p> <ul style="list-style-type: none"> • the authoriser can make a sound judgement on whether the records can be destroyed, and • the completed form provides good evidence about what records have and have not been destroyed. <p>e.g. <i>Trust Membership Forms 2001-2004</i></p> <p><i>CPN Diaries 1985-2005</i></p> <p><i>Bed Cleaning Register 2011</i></p> <p>Note: for certain records like personnel files, it will be necessary to record the name of each individual record to provide a reliable evidence of destruction.</p>
3	<p>Inclusive dates is either the date range of a record series e.g. <i>Ward Handover Books 1985-2005</i> or the date range of a specific record or file e.g. <i>Personnel File: Naylor D 2012-2013</i>.</p>

Once this form has been signed, and destruction has taken place, please forward the completed form to the corporate records lead for central audit purposes:

Email: CorporateRecords@uhb.nhs.uk

Note: if destroying records that are stored with a commercial off-site storage provider, please ensure the destruction receipt is attached to the corporate records destruction form when sent to above.