

SD-38

POLICY AND PROCEDURE

Record Keeping and Records Management

Approved by:



Date Effective From:

18-4-2017

Review Date:

April, 2020

CARRIGLEA CAIRDE SERVICES

Procedures Manual

Title: RECORD KEEPING AND RECORDS MANAGEMENT

1.0 Scope

1.1 To ensure correct management of the Services records and information.

2.0 Aims and Values

2.1 To have systematic control, organisation, access to and protection of the Services information and records in relation to service users, staff and all aspects of the running of the services.

2.2 To ensure a high standard of record keeping and report writing through-out the services.

3.0 Contents

- 6.0 Definition of a Record
- 7.0 Essentials of Records Management
- 8.0 Recording Information
- 9.0 Classification of Records
- 10.0 Service user Records
- 11.0 Personnel/Human Resources Records
- 12.0 Financial/Management Records
- 13.0 Health & Safety Records
- 14.0 Board of Directors Records
- 15.0 Records Destruction Policy

4.0 Referenced Documents

- SD-25 Information Governance (Confidentiality, Data Protection and Freedom of Information)
- HR-12 Grievance and Disciplinary Procedure
- HR-28 Trust in Care
- C4-23 Destruction of Records Log

5.0 Responsibilities

5.1 Management and all staff

Procedure No: SD-38		Manual Section No:
Issue No: 2		Page 2 of 12
Issue Date:	Authorised By: Vincent O'Flynn, Chief Executive	

6.0 Definition of a Record:

A record is defined as "any memorandum, book, plan, map, drawing, diagram, pictorial or graphic work or other document, any photograph, film or recording (whether of sound or images or both), any form in which data (within the meaning of the Data Protection Act, 1988) are held, any other form (including machine-readable form) or anything in which information is held or stored manually, mechanically or electronically and anything that is a part or a copy, in any form of any of the foregoing or is a combination of two or more of the foregoing" (Freedom of Information Act, 1997 & 2003).

7.0 Essentials of Records Management:

Records Management is the systematic collection, classification, indexing, retention and disposal of records (paper or electronic). Procedures should ensure that:

- Complete and accurate records of the Service's activities and decisions are created as soon as possible after the event.
- A copy is kept of all correspondence sent out on behalf of the service.
- E-mail messages are not retained on the server once they are deleted from the PC. Therefore, any e-mail messages which may need to be referred to at a later date should be printed and filed.
- A new record (whether created internally or received from elsewhere) is associated to its correct file.
- Records should be organised in a manner that minimizes the potential for one person's information being confused with another.
- Records should be dated and well organised for efficient retrieval.
- Records should be stored appropriately to prevent damage, loss or theft.
- Records are attached in the appropriate order in the file.
- Personal records are just that - they should hold information on the named person only – staff member or service user.
- Records are kept confidential where appropriate and kept in accordance with the terms of the Data Protection Act. See policy on *Information Governance Confidentiality, Data Protection and Freedom of Information*.
- Periodic audits of service users' records will take place as part of the *Person Centred Planning Audit Tool*.

8.0 Recording Information

Information must be recorded according to best practice methodology.

What should be recorded:

The type of records kept will vary depending on the service area and the list below is not exhaustive but is a general guideline in relation to service user records:

- Evidence of exchange of information between staff and service user or their families
- Reasons for decisions made regarding support/care/interventions
- Decisions not to take immediate action, but to review the situation later

Procedure No: SD-38		Manual Section No:
Issue No: 2		Page 3 of 12
Issue Date:	Authorised By: Vincent O'Flynn, Chief Executive	

- Instructions from healthcare professionals given verbally
- Details of visitors to a service user
- Activities/outings availed of by a service user

How to record:

- Ensure that the full name of the service user is on all pages of the record – each continuation sheet should also have the name of the service user.
- Give full name and title to all personnel mentioned in the record.
- Record factual information and record in consecutive order as events happen.
- Use short, clear and concise sentences.
- Record time and date of all entries (use 24 hour clock for time). The time of requesting assistance from medical/emergency services should always be recorded.
- Write clearly and legibly – use print form if necessary.
- Use black ink (including diary entries). Never use pencil.
- Do not leave blank spaces or skip lines.
- Do not use jargon, witticisms, derogatory remarks or exaggerate facts
- Record opinions with a statement such as “In my opinion.....”
- When quoting a person’s exact words put the words in quotation marks e.g. “my leg hurts”
- Sign each entry and state position. A data-base of signatories will be kept in relevant departments.
- Entries in service users’ notes should normally appear in chronological order.
- Generally, staff should not record an intervention on behalf of another person and staff should never alter an entry made by somebody else.

Mistaken entries

- Entries made in error should be bracketed and have a single line drawn through them so that the original entry is still legible. Errors should be signed and dated.
- Never use tipp-ex/erasers.
- Do not obliterate entries.
- Do not ‘squeeze’ a late entry into existing notes or write in the margins
- In general, entries should not be re-written. If it is necessary to re-write (e.g. if paper gets wet or torn) the originals should not be discarded.

Abbreviations

- Abbreviations must be kept to a minimum and if used should be in a standard form that is readily understood.
- Abbreviations should not be used in formal reports.

Retrospective Notes

- Notes should be written at the time the support/intervention takes place, or immediately afterwards
- Notes made retrospectively should have the date and time the note was recorded and the date and time the entry referred to.

Procedure No: SD-38		Manual Section No:
Issue No: 2		Page 4 of 12
Issue Date:	Authorised By: Vincent O’Flynn, Chief Executive	

- Entries should never be made ahead of time -- i.e. in anticipation of what is expected to happen.

9.0 Classification of Records:

Carriglea Cairde Services records can be classified under five broad headings, and the retention periods for each type are detailed in this policy:

1. Individual Service User Records
2. Personnel/Human Resource Records
3. Financial Records/Management Records
4. Health & Safety Records
5. Board of Directors Records

10.0 SERVICE USER RECORDS

Note: If under investigation or if litigation is likely, hold in original form indefinitely; - otherwise retain records in their original form for the minimum periods set out below:

PERSONAL RECORDS	RECOMMENDED RETENTION PERIOD
Current service users <i>Training records</i>	Retain all records which may be required for accreditation or audit purposes for at least 3 years and longer if relevant accreditation has not been obtained. Training Certificates obtained to be retained indefinitely. Otherwise retain for as long as deemed necessary to monitor the person's progress.
<i>Personal records</i> <i>Medical records</i> <i>Social work records</i> <i>Person Centred Plan/Daily Reports</i> <i>Correspondence with families</i> <i>Invoices for items purchased from service users' own funds</i> <i>Accident/incident report forms</i> <i>Records of Residents Private Property</i>	Retain indefinitely
Service users who are discharged	Keep all records indefinitely in central records room except training records which
Procedure No: SD-38	Manual Section No:
Issue No: 2	Page 5 of 12
Issue Date:	Authorised By: Vincent O'Flynn, Chief Executive

	may be destroyed after 3 years.
Deceased Service Users <i>Medical Records/diary of events</i>	At least 8 years after death
<i>Personal details</i> <i>details of admission, transfer/discharge</i> <i>personal property/bank account</i> <i>social work records</i>	Keep indefinitely in records room

Note: Medical records include G.P., Consultant, Psychological, Speech & Language, Occupational, Physiotherapy, Counselling, Dietetics and all other therapies and treatments which clients may have received.

On the death or discharge of a service user, all files pertaining to that person should be sent to the relevant Senior Services Manager for filing in the records room.

11. PERSONNEL/HUMAN RESOURCE RECORDS

The Terms of The Employment (Information) Act 1994 and 2012 and the Organisation of Working Time Act 1997 and 2011 lay down certain legal requirements concerning record retention. Other legal references include Safety, Health & Welfare at Work (General Application) Regulations, 1994 and 2007 and Workers Protection (Regular part-time employees) Act 1991.

Note: **If under investigation or if litigation is likely, hold in original form indefinitely; otherwise retain records for the minimum periods set out below:**

FILES	RETENTION PERIOD
<i>Unsolicited Applications for Jobs</i>	Hold for at least 6 months
<i>Competition Files:</i> <ul style="list-style-type: none"> ▪ Vacancy advertisement ▪ Job Description ▪ Short listing and Selection Criteria ▪ Curriculum Vitae of all candidates who specifically apply for the advertised job, are called for interview, candidates not qualified or short listed, candidates short listed, but not successful at interview or are successful, but do not accept offer 	Hold for a minimum of 2 years
<i>Interview Board Marking Sheet and Interviewers' notes relating to all candidate Interview Board recommendations</i>	Hold for at least 2 years Hold for at least 2 years
Procedure No: SD-38	Manual Section No:
Issue No: 2	Page 6 of 12
Issue Date:	Authorised By: Vincent O'Flynn, Chief Executive

<p><i>Staff Personnel Files:</i></p> <ul style="list-style-type: none"> ▪ Job specification ▪ Application /Curriculum Vitae ▪ References ▪ Garda clearance ▪ Offer/acceptance letter ▪ Recruitment medical ▪ Employment records ▪ Contract of employment ▪ Calculations relating to incremental credit and point on scale at appointment ▪ Probation record ▪ Performance appraisals ▪ Training record ▪ Resignation/retirement letter ▪ Maternity Leave/Adoptive Leave ▪ Parental Leave ▪ Force Majeure Leave ▪ Any document signed by staff giving authorization for deductions, acceptance or refusal of offer or notification of change of bank or personal details ▪ Vaccinations ▪ Accident/incident forms ▪ Birth/marriage Certificate 	<p>Retain for the duration of employment. After retirement or resignation, hold all records. In the case of a deceased employee, after one year the following may be destroyed:</p> <ul style="list-style-type: none"> ▪ Probation record ▪ Performance appraisals ▪ Sick certificates ▪ Maternity Leave ▪ Adoptive Leave ▪ Parental Leave ▪ Force Majeure Leave ▪ Training records <p>All other records to be retained indefinitely. Records required for superannuation / pension purposes must never be destroyed.</p>	
<p><i>Letter of Wishes re pensions scheme</i></p>	<p>Kept in sealed envelope in the safe until death of employee.</p>	
<p><i>Training Files:</i></p> <ul style="list-style-type: none"> ▪ General e.g. Continuing Education Training, Management Training, Health & Safety related Training. Formal qualifications etc – details of training courses; ▪ Applications for courses and sponsorship, notifications & qualification attained 	<p>Keep all records of qualification or certification indefinitely. Keep applications and other correspondence regarding training for at least 5 years or longer if deemed necessary</p>	
<p><i>Leave Records:</i></p> <ul style="list-style-type: none"> ▪ Annual leave ▪ Sick leave record including certificates ▪ Career break applications & correspondence ▪ Special leave 	<p>As these records may be required for calculation of superannuation benefit, they will be kept indefinitely for all employees, past and present. Records will be kept for 3 years after death of employee /pensioner and after spouse/children are no longer eligible</p>	
<p>Procedure No: SD-38</p>		<p>Manual Section No:</p>
<p>Issue No: 2</p>		<p>Page 7 of 12</p>
<p>Issue Date:</p>	<p>Authorised By: Vincent O'Flynn, Chief Executive</p>	

<ul style="list-style-type: none"> ▪ Jury service leave ▪ Compassionate leave record 	for dependent's pension.
<i>Discipline Records & letters</i>	Hold as per our disciplinary policy (HR-12).
<i>Allegations & Complaints</i>	Documentation relating to allegations investigated under Trust in Care (HR-28) is kept indefinitely. All records in relation to allegations involving criminal activity should be retained indefinitely.
<i>Industrial Relations</i>	Hold indefinitely
<ul style="list-style-type: none"> ▪ Correspondence to & from Trade Unions ▪ Individual Industrial Relations issues ▪ Minutes of meetings 	

12.0 FINANCIAL AND MANAGEMENT RECORDS

Retention of financial records is in accordance with the requirements of the Companies Act and guidelines issued by the revenue commissioners.

Note: If under investigation or if litigation is likely hold in original form indefinitely, otherwise retain records for the minimum periods set out below.

RECORD	RETENTION PERIOD
<i>Accounts Payable:</i> <ul style="list-style-type: none"> ▪ Invoices 	Hold hard copy for at least 7 years. Hold invoices for large items indefinitely
<ul style="list-style-type: none"> ▪ Creditor Statements 	Hold for at least 2 years.
<ul style="list-style-type: none"> ▪ Delivery dockets 	One year after end of financial year. Not to be destroyed before external audit and approval by board of the annual accounts.
<ul style="list-style-type: none"> ▪ VAT Records ▪ Tax Clearance Certs ▪ Petty cash vouchers 	Hold for at least 7 years
<ul style="list-style-type: none"> ▪ Petty Cash Books ▪ Creditors Ledger 	Hold indefinitely
<i>Accounts Receivable:</i>	Hold books and records indefinitely

Procedure No: SD-38		Manual Section No:
Issue No: 2		Page 8 of 12
Issue Date:	Authorised By: Vincent O'Flynn, Chief Executive	

<ul style="list-style-type: none"> ▪ Income Ledger/Listings ▪ Control Accounts ▪ Receipts Reconciliation 	
<i>Agreements - Rental, Lease, Use, Occupancy</i>	Retain Indefinitely
<i>Bank Records:</i> <ul style="list-style-type: none"> ▪ Cheque Stubs ▪ Cancelled cheques ▪ Bank Reconciliations ▪ Bank Statements 	Hold hard copy for at least 6 years prior to current year plus current year's records Retain bank statements indefinitely
<i>Capital Projects: All documentation</i>	Retain indefinitely
<i>Financial Statements:</i> <ul style="list-style-type: none"> ▪ Annual Financial Statements ▪ Final Budgetary Reports for any year ▪ Registers maintained i.e. reg. of insurances, mortgages, assets, etc. • Employment control/staff census • Correspondence re additional staff numbers 	Retain indefinitely in original form
<i>Fixed Assets:</i> <ul style="list-style-type: none"> ▪ Records of Properties, Sale and Purchase ▪ Assets Register 	Retain indefinitely in original form
<i>Insurance Files:</i> <ul style="list-style-type: none"> ▪ Insurance Policies ▪ Accident Reports ▪ Claims Records ▪ All Correspondence 	Retain indefinitely
<i>Audit Reports & Management Letters</i>	Retain indefinitely in original form
<i>Financial Regulations, Policies & Accounting Standards, Accounting Legislation,</i>	Hold until superseded or audit signed off, whichever is later

Procedure No: SD-38		Manual Section No:
Issue No: 2		Page 9 of 12
Issue Date:	Authorised By: Vincent O'Flynn, Chief Executive	

<i>Monthly Expenditure and Income Reports</i>	Hold for at least 3 years
<i>Government Department and HSE Circulars & Correspondence</i>	Retain indefinitely
<i>Client Property Accounts</i> <i>Client bank accounts</i> <i>Client ledger</i>	Retain indefinitely
<i>Others:</i> <ul style="list-style-type: none"> ▪ purchase order books ▪ stores requisition books 	Hold for at least 7 years
Receipt books	Retain indefinitely
Minutes of meetings	Retain indefinitely
Reports from Regulatory Authorities e.g. HIQA, Environmental Health Officer, Fire Officer.	Retain Indefinitely
<i>Payroll:</i> <ul style="list-style-type: none"> ▪ Listings, ▪ Pay slips ▪ Pay scales ▪ Time sheets ▪ Increment details 	Retain indefinitely
<i>PAYE/PRSI records</i> <ul style="list-style-type: none"> ▪ P35L ▪ 	Retain indefinitely
<ul style="list-style-type: none"> ▪ Employee certificates of tax credits (P2C) 	Hold until after annual external audit.

<i>Pension Records:</i> <ul style="list-style-type: none"> ▪ Register of members ▪ Records of Trustee meetings ▪ All correspondence re NHASS ▪ All correspondence re Irish Life Scheme ▪ All details of AVC's ▪ All details of Income Protection Scheme Members contributions and service days	Retain indefinitely
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------

Procedure No: SD-38		Manual Section No:
Issue No: 2		Page 10 of 12
Issue Date:	Authorised By: Vincent O'Flynn, Chief Executive	

13.0 HEALTH & SAFETY RECORDS

Safety Statement	Retained in all areas until updated and one copy of all outdated Safety Statements retained indefinitely by the Health & Safety Co-Ordinator.
Minutes of safety committee meetings Correspondence with Health & Safety Authority Reports of accidents/incidents Safety Audits	Retained indefinitely

14.0 BOARD OF DIRECTORS RECORDS

Minutes of Board Meetings and meetings of sub-committees of the board	Retain indefinitely
Legal Documentation in relation to the Company	Retain Indefinitely

15.0 RECORDS DESTRUCTION POLICY

When original records are destroyed, a clear destruction procedure should be applied.

Any of the records mentioned in this policy should not be destroyed without the permission of the Chief Executive, the Administrator/Quality & Standards Manager, the Accountant, the Human Resources Manager or a Senior Services Manager (as appropriate).

In relation to personal records i.e. service users and staff records, a record of items destroyed from file should be maintained in the file on a **Destruction of Records Log**. This record should include:

- Person's name
- Date of birth
- List of documents destroyed
- Date of destruction of items from file & the manner in which they were destroyed
- Signature of approval for destruction from an appropriate officer

Confidentiality must be insured at all times and therefore any personal or confidential Record should only be destroyed by shredding or incineration.

Security of files must be maintained while in transit or awaiting destruction.

Procedure No: SD-38		Manual Section No:
Issue No: 2		Page 11 of 12
Issue Date:	Authorised By: Vincent O'Flynn, Chief Executive	

Where a contractor is hired to carry out any of the aforementioned processes they should be required to sign a confidentiality undertaking and to produce written certification of proof of destruction.

Procedure No: SD-38		Manual Section No:
Issue No: 2		Page 12 of 12
Issue Date:	Authorised By: Vincent O'Flynn, Chief Executive	