



Belmont Orthodontic Centre

5a Belmont, Shrewsbury, Shropshire, SY1 1TE

Records Management and Data Quality Policy

The availability of accurate and up-to-date data is vital for the safety of the people we care for and the safe and responsible running of our organisation. We hold and maintain information about the business and our patients that is necessary for the efficient running of the practice and the effective provision of dental care.

To ensure that the practice complies with data protection legislation, this policy describes:

- How long information is kept
- How information is stored
- How we ensure accuracy
- How we correct errors
- How we archive information
- How we dispose of information

This policy applies to all the information (hardcopy and digital) that we process, including personal information.

All members of the dental team (including temporary staff) must understand and adhere to this policy.

The practice **Confidentiality policy** describes the need for all members of the dental team to keep patient information confidential and practice procedures for handling information about patients; it must be followed always. The arrangements for keeping information safe are described in the practice **Data Security Policy**, which includes the measures for physical and electronic security.

The practice Privacy Notice for patients helps them understand how the practice uses and protects their personal information.

Retaining information

Information about the business and its patients is kept in accordance with the information detailed below in the Archiving Records section of this document.

- **Patient records** are maintained and kept up to date while the individual remains a practice patient. When they cease to be a patient of the practice, their records are retained for a minimum of ten years following their last visit to the practice or until age of 25, whichever is the longer. . ***Please note that as a result of the present advice given to all patients of the need for lifelong retention, and the ability of each patient to return to this practice for the replacement of their retainers as and when required, the Patient Record cards to include patient treatment data and dental x-rays are to be kept on an indefinite basis to allow clarification where necessary prior to the provision of further retainer appliances. The patient record cards stored as paper notes will be stored in filing cabinets in the locked archive room within the Practice. The electronic patient record cards are to be stored within the orthotrac software system.***
- **Personnel and associate records** are maintained and kept up to date whilst the individual works at the practice as an employee or self-employed contractor. Following their departure from the practice their records are retained for six years from the date of leaving the practice. Records relating to workplace accidents or injuries are retained indefinitely. Records for associates are kept for up to eight years.
- **Financial records** are retained for at least six years.
- **Business records**, including contracts with suppliers, are retained for at least six years.

Secure storage

All members of the team must protect information held by the practice and store it securely. Information is only accessed on a need-to-know basis: where it is necessary to carry out required tasks; in the delivery of care to patients; or upon the direct instruction of a senior person within the practice.

For records held electronically, access is password protected and restricted to those who, as part of their work duties, require the information. Electronic records are regularly backed-up by Orthotrac (patient storage software) with a daily e-mail being sent to the practice e-mail address to confirm successful back-up and Mrs Helen Walton backs up (all documents, policies and photographs) on a weekly basis. These backups are stored on a hard drive.

Non-electronic (paper) records are stored in a location that is not accessible to patients, visitors to the practice or other members of the public. To ensure that patient record cards, financial information and personnel records are stored securely they must be kept in lockable cabinets at the end of each working day and the keys retained by **Dr Philip Barton** or **Mrs Helen Walton** if Dr Philip Barton is away on annual leave.

Patient record cards are stored securely in lockable filing cabinets held in the main reception/admin office (if still current) or in the Archive Storage Room at the Practice. The Archive Room is kept locked at all times and access is gained by authorised personnel only by requesting the key from Dr Philip Barton or Mrs Helen Walton who will ask the member of staff the purpose for which they require access to the Archive Room.

Financial information and personnel records are stored securely in lockable metal filing cabinets with Dr Philip Barton or Mrs Helen Walton only having access to the keys.

Data accuracy procedures

To ensure that all information recorded at the practice is accurate, we check that it is:

- Authentic – the information was created by individual who ‘signed’ the record and at the time claimed. Staff use their personal profiles to enter information.
- Reliable – the information is complete and accurate and was created at the time of or as close as possible to the event and by those involved
- Integrity – The information is complete and unaltered; any alterations are clearly marked and identify the person who made them
- Useable – The information can be located when needed. The practice system for storing information is followed routinely.

Purpose

The principal purpose of patient records is to record and communicate information about the individual and their care. The records provide an accurate, complete and contemporaneous record and include the patient’s information, oral health status, treatment options discussed and the decisions taken. The principal purpose of staff records is to record employment details for payroll and business planning purposes.

To fulfil these purposes, we:

- Use standardised layouts for the contents of records, Orthotrac software, BDA policies held in both paper and electronic format, Peninsula documentation accessible through online portal, REGO system accessible through online portal, Dental Referral System (Wales) accessible through online referral portal. Personnel records held in paper form in Staff Folders secured in lockable metal filing cabinets.
- Ensure documentation reflects the full range of care, that all care is person centred and that care records are viewable in chronological order
- Provide a clearly written treatment plan when more treatment than an examination is required and we ensure that records are maintained, updated and shared with everyone involved
- Train staff on the creation and use of records (see induction plan) and provide annual training on good record keeping
- Have procedure that enables patients and staff to have access to their records on request

All staff who record information (on any practice system and whether hardcopy or electronic) are responsible for ensuring that the information is accurate and as complete as possible.

Correction of errors

Individuals have the right to access their personal data that we process and store and to request that inaccurate or incomplete records are rectified. Any team member may receive this request and all team members know to pass the request to the practice Data Protection Officer (DPO). Where we have shared information with a third party, we will inform them of any rectifications (if appropriate).

We will respond to a request for rectification within one month and may request identifying documents. If the request is complex, we may extend this to two months and provide the individual with the reasons for the extension. If the individual claims that the record is incomplete, the individual should provide the supplementary information.

When assessing a request to rectify record, we will restrict further processing. If we refuse the request, we will provide a full explanation in writing within one month of the receiving the request and inform the individual of their right to complain to the ICO and seek a judicial remedy.

The practice DPO keeps a record of rectification requests and outcomes

Archiving records

Where records need to be retained but are no longer required on a day-to-day basis, they are archived and stored securely. Records will be stored in a way that ensures easy identification and retrieval. The final decision on archiving information is taken by **Dr Philip Barton**.

Electronic records that need to be retained but are not required on a day-to-day basis are, in the first instance, archived within the IT system. Where electronic storage space is at or near capacity, archived electronic data will be copied onto a suitable electronic format with copies stored securely at the practice premises and off-site.

The practice has systems for reviewing archived information that is no longer needed. Please note that as a result of the present advice given to all patients of the need for lifelong retention, and the ability of each patient to return to this practice for the replacement of their retainers as and when required, the Patient Record cards to include patient treatment data and dental x-rays are to be kept on an indefinite basis to allow clarification where necessary prior to the provision of further retainer appliances. The patient record cards stored as paper notes will be stored in filing cabinets in the locked archive room within the Practice. The electronic patient record cards are to be stored within the orthotrac software system.

Patients study models however only require to be kept for the minimum term. Given the adequate storage space within the practice, it is assumed that within each archive study model storage box, a patient will have final records at the age of 9 years and hence their study models will require to be held for 16 years following the archiving of their study models. The study model archive boxes are checked on an annual basis and the archive boxes which are older than 16 years can then be earmarked for secure disposal as detailed below.

Secure disposal of old records

Records that are no longer required are disposed of securely by shredding, pulping or incineration. The services of a professional contractor will be used where necessary; a certificate of confidential destruction is obtained and retained by the practice as evidence of DPA compliance.

Patient study models are disposed of as soon as they are no longer required, and at the latest at the same time as the records associated with the patient are disposed of. Patient study models are disposed of using Initial Medical Services and a Certificate of Destruction is stored at Belmont Orthodontic Centre. Please note that as an extra measure of maintaining patient confidentiality, all study models so far disposed of were 'smashed' by Dr Philip Barton first to remove the patient details prior to loading into Initial Medical Services containers for their secure shipment for destruction.

Records held electronically and backups of electronic information are disposed of using the secure deletion option on the practice computer system or removed from the external hard drive if and when they reach their maturity date..

The final decision on disposing of records will be taken by **Dr Philip Barton**.

Responsibilities

The following individuals have data protection and quality responsibilities:

- **Data Controller Mrs Helen Walton** is responsible for reviewing the data quality policies and procedures at least annually
- **Data Protection Officer Dr Philip Barton** has responsibility for training staff in data quality, monitoring data quality throughout the practice, and responding to and recording rectification requests
- **Data Security Lead – Mrs Helen Walton** is responsible for the quality of records and ensuring that staff understand their commitments in ensuring data quality.

All team members are responsible for the quality of information they record and for reporting any errors to the Data Protection Officer. All team members understand that information accuracy and security is a contractual and legislative requirement and that breach of this policy might result in disciplinary action.

Signed:

Dr Philip Barton/Mrs Helen Walton

Date: **28th February 2021**

Review date: **28th February 2022**