



ST. PATRICK'S CENTRE (KILKENNY)  
KELLS ROAD KILKENNY

## Policy Document

**POLICY TITLE: Files and Record Keeping Policy**

Prepared by: John Murphy	Approval Date: 01.01.2015	Review Date: 01.01.2017
Policy Number 14 – Schedule 5	Approved By: Signed: <u>David Kieran</u> Operations Manager  Signed: _____ Board Member	

### Mission Statement

**To enable people to live a good life, in their own home, with supports and opportunities to become active, valued and inclusive members of their local communities.**

**To enable a supported self-directed living (SSDL) model of provision which is underpinned by our beliefs, values and vision.**

Review Date:	Amendments required:	New Revision Status:
Revision No: _____	_____	_____
Reviewed by: Corporate Governance Manager	Approved By:  Signed: _____ Operations Manager	

## Table of Contents

	Vision .....	
	Policy Review Group Members .....	
	Purpose of this Policy .....	
	Scope of this Policy .....	
	Policy Status .....	
	References to other Policies/Documents .....	
	Policy Approved By .....	
	Policy Review .....	
1.	Introduction .....	
2.	Function .....	
3.	Legislation .....	
4.	Ownership of Records and Files .....	
5.	Types of Records and Files .....	
6.	Content .....	
7.	Main File .....	
8.	Files Administrator .....	
9.	Working File .....	
10.	Designated File .....	
11.	Location .....	
12.	Confidentiality and Access to Records and Files .....	
13.	Safeguarding Files .....	
14.	Faxing Reports or Electronic Transfer of Reports (Email) .....	
15.	Audit of Files .....	

**Vision / Mission**

“Provide a home environment for children/adults with Intellectual Disability. Allocate our resources to excel in Human Dignity, Compassion and Justice for those entrusted to our care. Train and develop our staff in order to provide the highest quality of service. Serve with love

**Purpose of this Policy**

This policy document sets out the procedures for maintaining files and record keeping.

**Scope of this Policy**

This document applies to all staff, students, host families and volunteers (if applicable). Throughout this document the term ‘staff’ is used and includes all persons paid and unpaid who support people using our service.

**References to other Policies/Documents**

Confidentiality Policy – Developed

Data Protection – Draft

Internet/Email Use – To be developed

**Policy Approved By**

This policy (and Appendices) have been agreed and approved by the Chief Executive and the Management Team.

**Policy Review**

This policy will be reviewed on a yearly basis. More frequent reviews may take place if deemed warranted. This policy will be reviewed in line with current legislation and standards of good practice.

## **1. Introduction**

St. Patrick's Centre is a community based, person centred organisation focussing on the needs and abilities of children and adults with intellectual disabilities.

Our Mission is "Provide a home environment for children/adults with Intellectual Disability. Allocate our resources to excel in Human Dignity, Compassion and Justice for those entrusted to our care. Train and develop our staff in order to provide the highest quality of service. Serve with love. In order to achieve our mission the organisation must gather and hold information on individuals receiving supports and services. The organisation will keep in place a record and files and record system that maintains the balance between the rights of the individual being supported to confidentiality and the needs of the organisation in relation to the availability of information to individuals, their families and those who require to the information to effectively do their work.

## **2. Function**

The primary function of records and files are:

- to provide a factual record of the service provided;
- to provide a record of progress;
- to provide an accurate and comprehensive assessment of the needs of the person being supported and their family;
- to collate information that will enhance understanding of the needs of the person being supported and facilitate decision making;
- to provide necessary information to staff to enable them to provide the most beneficial service to the individual being supported and their family.

## **3. Legislation**

St. Patrick's Centre will comply with all relevant legislation Freedom of Information Act 1997 & 2003 and the Data Protection Acts 1988 & 2003.

The Freedom of Information Act gives individuals the right of access to any record held by public bodies. The act states that every individual has the right to know what information is held in records about him/her subject to certain exemptions and to have inaccurate material on records and files corrected.

Data Protection is the safeguarding of the privacy rights of individuals in relation to the processing of their personal information. Personal information is considered to be information which would ordinarily be known only to individuals or their family and friends and/or information relating to the individual that is held by a public body on the understanding that it would be treated as confidential.

## **4. Ownership of Records and Files.**

All documents relating to individuals being supported and their families written by employees and held in St. Patrick's Centre are legally the property of St. Patrick's Centre. This includes documents held on separate files and working documents.

**5. Types of Records and Files.**

Records and files relating to individuals being supported fall into three main categories:

- Main Files
- Working Files
- Designated Files

**6. Content**

The following principles of good practice will apply

- Personal information, where possible, should be collected directly from the person being supported.
- Records and files will not contain information which is relevant to the welfare of the person being supported and their families.
- In general only information directly related to the person being supported should be included in the file. In exceptional circumstances it may be necessary to include some specific information regarding a third party where it is directly relevant to the support of the individual. Staff should be extremely careful with regard to the nature and extent of this information and should discuss its inclusion in the file with the line manager.
- All entries will be signed, dated and legible.
- Content will be factual.
- The basis for professional opinions and judgements will be indicated.
- Working files will contain a copy of the individual support plan.
- Where there is an allegation or incident it is important that the author is factual and states who was present when the allegation/incident occurred.

**7. Main File**

The main file will contain relevant records and reports of the person being supported. Each file has a completed up to date, standardised Key Information Sheet at the front. The main file may also include the following:

- Professional reports and correspondence relating to the person being supported. This will only include older reports generated prior to the use of Working Files. Current or new professional reports and correspondence should be included in the Working File and need not be copied to the Main File.
- Record of the service provided.
- Correspondence regarding admission.
- Legal documents.

When there is a new admission the Managers forwards all relevant information to the files administrator to set up a new main file. It is the responsibility of the manager to ensure the most up to date information is on the main file (e.g. change of address, GP or next of kin).

#### **8. Files Administrator**

- The organisation will nominate a files administrator.
- The main role of the files administrator is to ensure that the main files have been set up and appropriately secured.
- Requests to access main files are made through the files administrator.

#### **9. Working File**

The working file will include the following:

- Completed Key Information Sheet
- Key People Supporting Individual Sheet
- Signed copy of the Individual Support Plan
- Individual Support Plan Reviews
- Medical/Health Details
- Support Notes
- Accident/Incident Forms
- Psychology/Social Work/Other Agency Input
- Correspondence
- Miscellaneous

When a working file becomes full clearly mark on the outside the opening and closing dates of the file before commencing a new one. This closed working file remains in the area for 12 months.

#### **10. Designated File**

A designated file is a privileged and confidential file held by the Designated Liaison Person. The information on the file relates to concerns, complaints or suspicions which have been notified to the Designated Liaison Person. The existence of a designated file will be indicated on the Key Information Sheet at the front of the main file. Access to designated files will be through the Designated Liaison Person or nominee.

#### **11. Location**

The main file are centrally located in St. Patrick's headquarters and accessed through the files administrator.

The working file will be held in the place/location where the person is supported. The Sector Manager or person designated by the regional manager is responsible for these files on a day to day basis. When an individual moves from one area to another the working file will be transferred to the new location. All working file are archived after one year.

The designated file is held in the Designated Liaison Person's Office.

All records and files will be closed and returned to the files administrator upon the death of someone receiving a service or in the event that the person leaves the service.

## **12. Confidentiality and Access to Records and Files**

Information held by the services on file should be accessible to the person receiving the service and by parents of children in the services. All such access should be requested and processed through the manager. Apart from some exemptions individuals receiving support have a legal right of access to information under the Freedom of Information Act 1997/2003 and the Data Protection Act 1988/2003. On admission all individuals will be made aware of their rights in relation to files and records and the access to such files and records.

Files of the people we support contain information which needs to be treated in a highly confidential manner. Access to these files needs to be limited to those who absolutely need to have access to such information. The manager of the individual's service needs to have access to the files as does other relevant professional services such as social work teams and psychology teams when necessary. It is not unusually necessary for frontline staff to view main files. However, relevant information regarding the person needs to be passed to frontline support staff. This can either be done by the individual themselves or alternatively by the co-ordinator or manager of the service where the person does not have the ability to transfer the information. The person accessing the information will accept personal responsibility to access only the information that he or she needs to know. The manager in each area is responsible for deciding which staff members can appropriately access main files. Frontline staff will have access to the working file.

It may be relevant for students who come to St. Patricks on placement as part of their professional training to have access to information on individuals and have access to information held on files. The necessity and relevance of such access will be determined by the individual receiving supports and services in consultation with the supervisor, who is an employee of St. Patrick's Centre.

No report should be photocopied without the permission of the author of the report. If the person is unobtainable because they are on leave or have left the organisation permission should be sought from their line manager. When copies are circulated at a meeting they should be returned to the Chairperson at the end of the meeting for shredding unless it is deemed appropriate that specific individuals retain a copy for their own files.

Confidential data regarding a person being supported should only be saved on St. Patrick's Centre, PC and should never be saved on a home PC or an unencrypted laptop or held on a memory stick.

## **13. Safeguarding Files**

Main files will be removed from base only in exceptional circumstances, for example, when the nature of the work demands that the life is required to be in a different location for a particular purpose. In these circumstances, the person taking the file is fully responsible for safeguarding the file. Files removed in such a way must be signed out and dated with the files administrator. The file must be returned and signed back in through the files administrator.

Files should be stored in such a way that minimise the potential for deterioration and loss.

### **Lost, Misplaced or Damaged Files**

Where a file is unable to be found and there are concerns it may be lost, staff must:

1. Notify the fact to their line manager as soon as possible.
2. The line manager must notify the files administrator.
3. The files administrator will forward a copy of the key information sheet to the line manager so that an interim working file can be put together.
4. The line manager should make attempts to establish if any staff have the file and where and when it was last located.
5. If the file is unable to be located within 30 days it is deemed misplaced presumed lost.
6. The line manager should contact the individual and if deemed necessary their family within 5 working days of the files being deemed lost.
7. Where a file is damaged to such an extent that some or all parts of the file are no longer usable.
  - (i) Staff should notify the fact to their line manager as soon as possible.
  - (ii) The line manager must notify the files administrator.
  - (iii) The files administrator will forward a copy of the key information sheet to the line manager if required so that a replacement working file can be put together.
  - (iv) Any records which remain unable or readable should be retained and included in a replacement file.
  - (v) The replacement file should include an index of what information was lost/destroyed.
  - (vi) Efforts should be made to locate copies of reports or correspondence which were destroyed so that they can be included in the replacement file.
  - (vii) A review of why the file becomes damaged should be carried out by the relevant manager.

### **14. Faxing Reports or Electronic Transfer of Reports (Email).**

It is the policy of St. Patrick's Centre not to fax or electronically transfer reports on individuals receiving supports except in exceptional circumstances and only when:



- There is prior permission of the author or Head of Service.
- There has been prior agreement that the person to whom the report is being faxed has arranged to personally receive the fax as it arrives at the destination.
- The person to whom the report is being transferred or their delegate has sole access to the electronically transferred report.
- Where information is to be shared outside of the service consent will be sought from the individual or guardian. In exceptional circumstances, it may be necessary or legally required to share information.
- Staff should not hold personal information, reports, notes pertaining to individuals receiving services on memory sticks.

#### **Email**

Ideally emailing notes/minutes/reports that contain personal information pertaining to individuals receiving services should be avoided if possible. In circumstances when this is necessary the information should be included in an attached document which is password protected.

#### **15. Audit of Files**

There will be an annual audit of files to ensure that all files are secure and in their appropriate location.

Any issues that arise with regard to files which do not seem to be covered by this policy please contact the files administrator.