The Newcastle upon Tyne Hospitals NHS Foundation Trust

Occupational Health Records Management and Retention Operational Policy

<table>
<thead>
<tr>
<th>Version No.</th>
<th>2</th>
</tr>
</thead>
<tbody>
<tr>
<td>Effective From:</td>
<td>22 June 2017</td>
</tr>
<tr>
<td>Expiry Date:</td>
<td>22 June 2020</td>
</tr>
<tr>
<td>Date Ratified:</td>
<td>30 May 2017</td>
</tr>
<tr>
<td>Ratified by:</td>
<td>Clinical Records Advisory Committee</td>
</tr>
</tbody>
</table>

1 Introduction

1.1 A clinical record is defined as a record consisting of information about the physical or mental health or condition of an identifiable individual made by or on behalf of a health professional in connection with the care of that individual. It may be in a computerised form or in a paper form or a combination of both.

1.2 This policy details the specific procedures and responsibilities for the management of Occupational Health clinical records (records) within the Trust and the processes that are in place to ensure the security and safety of the information held.

2 Scope

This policy relates to all records created within the Newcastle Occupational Health Service (NewcastleOHS) and aims to provide a framework for the management of records in order to support the delivery of clinical care. Management of the records is the responsibility of all staff within NewcastleOHS and is not limited to clinical staff. These guidelines need to be read in conjunction with the Trust Records Management Policy and do not replace the requirements of the Trust's Clinical Record Keeping Policy.

3 Aims

3.1 This policy outlines the fundamental requirements of sound clinical records management processes in order to ensure that a comprehensive system for the storage and retrieval of clinical records is in place.

3.2 This policy outlines the roles and responsibilities of all parties. It outlines the requirements for Occupational Health records management and retention.

4 Roles and Responsibilities

4.1 Chief Executive

The Chief Executive has overall responsibility for all Records Management in the Trust.

4.2 Caldicott Guardian
The Medical Director is the Trust’s Caldicott Guardian and has lead responsibility at Trust Board level for clinical records management within the organisation.

4.3 Clinical Records Advisory Committee

The Clinical Records Advisory Committee is responsible for ensuring that this policy is implemented and that the records management systems and processes are developed, co-ordinated and monitored.

4.4 Clinical Lead Manager – is responsible for the implementation and monitoring of this policy.

4.5 All Staff

All staff within NewcastleOHS, whether clinical, or administrative, must be provided with appropriate training on induction and thereafter at regular intervals to ensure that they are aware of their personal responsibilities in respect of clinical record keeping and records management.

5 Creation of records

5.1 COHORT@ is a purpose built electronic records management system designed for occupational health services. NewcastleOHS uses a secure Tier 4, ISO 27001 hosted datacentre which provides IT functions such as infrastructure, security and monitoring; along with the storage and backup of the COHORT@ product and database.

5.2 All clients who contact NewcastleOHS will be registered onto the COHORT@ OH System through the creation of a unique clinical record linked to employment or educational institution. This generates a unique number which will be used on correspondence. Records are developed on a chronological basis within COHORT@ following each contact.

5.3 Clinical records will be developed and maintained in line with the Clinical Record Keeping Policy so far as applicable by NewcastleOHS.

6 Forms of record

6.1 Occupational Health records will be held on a single data base and will be differentiated by Employer or educational institute to ensure confidentiality.

6.1.1 Trust staff- Records will be held electronically in the COHORT@ system and will contain immunisation records, including clinical notes, emails and other relevant information provided by managers and human resources. Paper documents that are added to the record will be scanned and held on the COHORT@ system. Clinical records are held on the Trust archive system ‘Therefore’ in accordance with the Trust’s Clinical Records Management Policy where applicable.
6.1.2 Other organisations- NewcastleOHS provides services to a range of external organisations. Clinical records will be held electronically within COHORT@ electronic records system. New clients will be registered in COHORT@ in order to monitor and report appointment activity to the external organisation.

6.2 All records are held separately from any other staff health or employment record within the Trust. There is no sharing of staff records with human resources, or the manager. Trust medical records where the staff member may have been a patient of the Trust are not accessible to occupational health staff.

6.3 Other clinical records created on COHORT@ and held by the NewcastleOHS are for:

6.3.1 Clinical Psychology and Counselling records – Clinical Psychology and Counselling clinical records are held electronically on COHORT@ records management system separately to other clinical records. Access to these records is by designated professionals only. These records are not available to other members of the NewcastleOHS team.

7 Access to Occupational Health Records

7.1 The Data Protection Act 1998 gives every living person or their authorised representative, the right to apply for access to their health records irrespective of when they were compiled. Access to the health records of deceased persons is governed by the Access to Health Records Act 1990.

7.2 The Occupational Health clinical record will be "sensitive personal data" for the purposes of the Data Protection Act 1998 and as such cannot be processed without the consent of the individual.

7.3 No confidential information from the clinical record should be passed to any other person outside the Occupational Health Services without the written consent of the individual concerned, unless the disclosure is a requirement:
- Imposed by a judge or court of law;
- To satisfy specific legislative requirements; or
- Due to someone exercising statutory powers that enable them to receive such information, i.e. NMC.

7.4 Access Process

An application for access to an Occupational Health record or to any part of a health record may be made to the holder of the clinical record. All applications for access to information under the terms of the Act must be made in writing and directed to the Clinical Lead Manager / Clinical Director (the appointed officer). See (Appendix 1) for Standard operating procedure.
7.4.1 Application for immunisation records must be made in writing or submitted electronically to a secure email address using the request form (Appendix 2).

7.4.2 Applications for access to records under the terms of the Act must be made in writing or submitted electronically to a secure email address using the standard request form (Appendix 3).

7.4.3 A separate application must be made in writing by the individual for copies of counselling and or clinical psychology records as these are not considered to be part of the Occupational Health record (Appendix 4).

7.4.4 A request for records by a solicitor must be made in writing to NewcastleOHS and must include a signed consent to release form from the client indicating exactly which records are required. A fee of £50 administration will be incurred.

7.4.5 Once a request has been received for release of full or part records. The request will be processed within 21 days. An application for access to a health record or to any part of a health record may be made to the holder of the health record by any of the following:-

- The patient.
- Any person authorised in writing on the patient's behalf.
- Where the patient is incapable of managing his/her own affairs, any person appointed by a Court to manage their affairs as per http://nuth-vintranet1/apps/policies/CorporateGov/MCAPolicy201303.pdf.
- The patient's personal representative and any person who may have a claim arising out of the patient's death where the patient has died.
- The Police.
- Other Government or NHS bodies such as DWP.

7.4.6 Once a request has been received the appointed officer must acknowledge receipt of the application in writing via post or email depending upon how the request is received. Requests will be completed within 21 days from receipt of the request in accordance with the Data Protection Act 1998 and Information Commissioners Office Guidelines 2016.

7.4.7 When the health record has been obtained it will be reviewed by the appointed officer. Where it is felt there may need to be redaction of the record such as in the case of third party information the clinician involved in the management of the patient will be notified and will review the record prior to its release to ensure no data detrimental to the mental wellbeing of the individual is released. All third party information will be redacted where appropriate, for example another patient or family member’s details. See (Appendix 5) appointing officers checklist.
7.4.8 Once access has been granted the patient or his/her representative should be allowed to either inspect the health record within the Trust. Or receive either photocopies of the relevant record or the paper copy converted to an electronic file. Where there is a large paper health record or multiple volumes of a health records this will be converted into an electronic file to ensure safe efficient transfer of the record.

7.5 Correction of the Clinical Record

If a client considers an entry in the clinical record to be inaccurate he/she may apply in writing to have the entry corrected. These requests must be directed to the Consultant Occupational Health Physician or Clinical Lead Manager who will liaise with the relevant clinician.

7.5.1 If the clinician and the Consultant Occupational Health Physician/ Clinical Lead Manager are satisfied that the information is inaccurate, the necessary correction will be made. Records cannot be deleted in COHORT@ and an amendment statement will be added sequentially.

7.5.2 If the client is not satisfied with the outcome this must be recorded in the clinical record with a description of which information is considered by the applicant to be inaccurate.

7.5.3 In either case, without requiring any fee, the Consultant Occupational Health Physician/ Clinical Lead Manager should supply the Applicant with a copy of the correction or note.

8 Transfer of records on termination of contract

8.1 When NewcastleOHS is informed of termination of contract or transfer to another OHS provider the following processes will be applied.

8.1.1 Consent and Tracking of records

To allow tracking of records the NewcastleOHS keeps an appropriate documentation system indicating to whom and to where OH records have been forwarded and the date the records were transferred. The documentation details the first destination the records were forwarded to. The reason for holding this information is made clear to the individual in accordance with the Data Protection Act.

8.1.2 The informed written consent of the employee is required to allow transfer of their Occupational Health records. This is both a legal and ethical requirement. This will be obtained by the new employer (the Receiving OHS) who is seeking the notes. See (Appendix 6).

8.1.2 On the occasion that the receiving OH provider refuses receipt of the records. The default position is the records belong to the employer/ organisation that have contracted the service. In this instance
NewcastleOHS would engage the assistance of the Trusts Information Governance service to assist in communications with the Information owner.

8.2 Method of Transfer –

On receipt of the informed, written consent from the Receiving OHS, the sending OHS will transfer the records using the approved method. NewcastleOHS will contact COHORT@ support team to request extraction of the identified records. The data will be extracted from COHORT@ via a CSV file.

8.2.1 Electronic transfer. - If the recipient uses a compatible version of COHORT@ information will be transferred via the COHORT@ service user team OH service to OH service. Alternatively the information extracted from the data base will be converted where practical to a format that the recipient requests for data upload.

8.3.2 Records that cannot be transferred electronically will be transferred through the Royal Mail Recorded Delivery Service, or an equally secure method of transfer.

8.3 Acknowledgement of Receipt –

In order to provide assurance that the records have been received, the receiving OHS must sign and return a confirmation of receipt to the sender. This will be included in standard record transfer documentation (Appendix 7) via post and (Appendix 8) if collected in person.

8.3.1 An electronic receipt can be sought as an automatic process when the record is sent via nhs.net or password protected e-mail.

8.4 Scrutiny of Records Prior to Transfer and copying if required –

Once records have been transferred to an approved OH provider / responsible data handler and the accuracy of the data transfer confirmed. NewcastleOHS will no longer have rights to hold the information unless specifically agreed by the client and or data handler. The records must be removed from NewcastleOHS COHORT@ data base by the COHORT@ service user team.

9 Records Retention

Occupational health clinical records will be kept in accordance with the IGA Records Management Code of Practice for Health and Social Care 2016. This states Employers must retain a proportion of the records until the 75th Birthday as outlined below:
<table>
<thead>
<tr>
<th>Record Type</th>
<th>Retention Start</th>
<th>Retention Period</th>
<th>Action at end of retention period</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Exposure Monitoring</td>
<td>Monitoring Ceases</td>
<td>40 years/5 years from the date of last entry made</td>
<td>Review and if no longer needed destroy</td>
<td>A) where a record is representative of the personal exposure of identifiable employees for at least 40 years B) In any other cases, for at least 5 years</td>
</tr>
<tr>
<td>Occupational Health Reports (letters, emails and clinical notes)</td>
<td>Staff Member Leaves</td>
<td>Keep until 75th Birthday or 6 years after the staff member leaves whichever is sooner</td>
<td>Review and if no longer needed destroy</td>
<td></td>
</tr>
<tr>
<td>Occupational Health Report of a Staff Member under health surveillance</td>
<td>Staff Member Leaves</td>
<td>Keep until 75th Birthday</td>
<td>Review and if no longer needed destroy</td>
<td></td>
</tr>
<tr>
<td>Occupational Health Report of a Staff Member under health surveillance where they have been subject to radiation doses</td>
<td>Staff Member Leaves</td>
<td>50 years from the date of last entry or until 75th Birthday whichever is longer</td>
<td>Review and if no longer needed destroy</td>
<td></td>
</tr>
</tbody>
</table>

9.1 Clinical Psychology and counselling records - Must be held for twenty years in accordance with interpretation of Mental Health Act 1983 or for 8 years after the death of the patient.

10 Records Security

10.1 Access to Occupational Health records will be restricted to NewcastleOHS only and managed in accordance with the Local Policy for Confidentiality relating to Occupational Health Records and Release of Occupational Health Information.

10.2 Movement of records internally and externally must comply with the Trust's Confidentiality and Security Policy and the Local Policy for Confidentiality relating to Occupational Health Records and Release of Occupational Health Information.

10.3 Electronic COHORT@ OH records will be stored on an external secure Tier 4, ISO 27001 servers. COHORT@ daycentre provides all IT functions such as infrastructure, security and monitoring; along with the storage and backup of your Cohort product and database under the service level agreement between NewcastleOHS and COHORT@. Electronic Therefore@ records will be maintained by Information Services in accordance with the Access Control Policy.
10.4 Training will be as part of induction and will be monitored as part of the induction checklist. Training updates will be carried out annually as part of trust departmental training programme.

11 Equality and Diversity

The Trust is committed to ensuring that, as far as is reasonably practicable, the way services are provided and the way staff are treated reflects their individual needs and does not unlawfully discriminate against individuals or groups. This policy has been properly assessed.

12 Monitoring Compliance with the Policy

<table>
<thead>
<tr>
<th>Standard / Process / Issues</th>
<th>Monitoring and Audit</th>
<th>Method</th>
<th>By</th>
<th>Committee</th>
<th>Frequency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Access to immunisation request</td>
<td>Audit – COHORT report clinical admin – imms request</td>
<td>Senior OH team</td>
<td>Committee as part of annual report</td>
<td>Annually</td>
<td></td>
</tr>
<tr>
<td>Access requests legal</td>
<td>Audit – COHORT report clinical admin medico legal-</td>
<td>Senior OH team</td>
<td>Committee as part of annual report</td>
<td>Annually</td>
<td></td>
</tr>
<tr>
<td>Records Retention</td>
<td>Audit – COHORT report</td>
<td>Senior OH team</td>
<td>Committee as part of annual report</td>
<td>Annually</td>
<td></td>
</tr>
</tbody>
</table>

13 Consultation and review

This policy has been raised at the Clinical Records Advisory Committee and the Occupational Health Management Committee.

14 Implementation of Policy (including raising awareness)

Implementation and awareness of the policy will be raised with all NewcastleOHS staff through internal training.

15 References

- Management of Health and Safety at Work Regulations 1999
- Control of Substances Hazardous to Health Regulations 2002
- Data Protection Act 1998
- Control of Asbestos at Work Regulations 2002
- Ionising Radiation Regulations 1999

16 Associated Documentation

- [Access Control Policy](#)
- Clinical Records Management Policy
- Clinical Record Keeping Policy
- Local Policy for Confidentiality relating to Occupational Health Records and Release of Occupational Health Information

Produced by: Clinical Lead Manager - NewcastleOHS
Clinical Records Advisory Committee
Appendix 1

SOP for the application for access to Occupational Records (excluding Clinical Psychology and Counselling)

Access request made by Self, Legal representative, Trust legal department.

Immunisation records **Appendix 2**

Records request in writing / email by in individual to Newcastle.ohs@nhs.net

Solicitor request including a sign release form from the client. Charge applies. Notify the firm of the administration fee £50

**NB Counselling and or Psychology records will not be released as part of a standard request. If required this must be explicit in request.**

Access request consent form (highlighting the specific notes to be released) is uploaded into the clients COHORT@ records.

Records will be collated by OH admin team. Admin attach Occupational Health records checklist.

Records will be passed to the appointed officer. The information to be released will be checked and review against the exact information that is to be released as per initial request.

Client has queries related to the notes to be released this is to be discussed with Clinical Lead Manager or Clinical Director.

Consent to release notes.

No

Contact client and arrange for notes to be viewed. Notes reviewed by client and agreed for release.

Yes

Clinician completes release of OH records **Checklist** this is uploaded into the COHORTS@ notes.

Release records – If indicated Raise invoice for Solicitor request up to £50. Only release once paid.
Appendix 2

Newcastle OHS

Newcastle.ohs@nhs.net

Request for immunisation and blood test results information from your Occupational Health Record

Please complete the form below and email it to Newcastle.OHS@nhs.net. By emailing the completed form you are consenting to information being extracted from your OH record. Once received, your request will be processed within 10 working days. Please do not contact the department within this period. Failure to complete this form accurately may result in a delay of processing your request.

Detail of Request: I would like to request a copy of my immunisation and blood test details, including photocopies of recent laboratory reports from my Occupational Health Record.

Personal Details:

<table>
<thead>
<tr>
<th>First Name</th>
<th>Surname</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Date of Birth</th>
<th>Email</th>
<th>Mobile / tel</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Main postal Address</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>

Employment/Student Details:

<table>
<thead>
<tr>
<th>Employed</th>
<th>Student</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dept/Location place of work</td>
<td>University</td>
</tr>
<tr>
<td>Position held</td>
<td>Course/ Year of intake</td>
</tr>
</tbody>
</table>

Please highlight how you wish to receive the requested information:

Email – please confirm email address

Collect in person from OH Department

Post to main postal address - please include postcode

Date of request ________________________

* If you have requested report to be sent to an external email address. You are advised that we cannot guarantee the security of the message and that it is your responsibility to protect data stored on your device.
Appendix 3

REQUEST FOR A COPY OF YOUR OCCUPATIONAL HEALTH RECORDS

Please complete the form below and email it to Newcastle.OHS@nhs.net. Once received, you will be giving your consent to process your request. Failure to complete this form accurately may result in a delay of processing your request.

**Detail of Request:** I would like to request a copy of my Occupational Health Records

**Personal Details:**

<table>
<thead>
<tr>
<th>First Name</th>
<th>Surname</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Date of Birth</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Email</th>
<th>Mobile / tel</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Main postal Address</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>

**Employment/Student Details:**

<table>
<thead>
<tr>
<th>Employed</th>
<th>Student</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dept/Location place of work</td>
<td>University</td>
</tr>
<tr>
<td>Position held</td>
<td>Course/ Year of intake</td>
</tr>
</tbody>
</table>

**Please highlight how you wish to receive the requested information:**

<table>
<thead>
<tr>
<th>Collect in person from OH Department</th>
</tr>
</thead>
<tbody>
<tr>
<td>Post to main postal address - please include postcode</td>
</tr>
</tbody>
</table>

Date of request ______________________
Appendix 4

REQUEST FOR A COPY OF YOUR COUNSELLING/PSYCHOLOGY RECORDS

Please complete the form below and email it to Newcastle.OHS@nhs.net. Once received, you will be giving your consent to process your request. Failure to complete this form accurately may result in a delay of processing your request.

Detail of Request: I would like to request a copy of my *Counselling/*Psychology Records (*delete where appropriate)

<table>
<thead>
<tr>
<th>Personal Details:</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>First Name</td>
<td>Surname</td>
</tr>
<tr>
<td>Date of Birth</td>
<td></td>
</tr>
<tr>
<td>Email</td>
<td>Mobile / tel</td>
</tr>
<tr>
<td>Main postal Address</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Employment/Student Details:</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Employed</td>
<td>Student</td>
</tr>
<tr>
<td>Dept/Location place of work</td>
<td>University</td>
</tr>
<tr>
<td>Position held</td>
<td>Course/ Year of intake</td>
</tr>
</tbody>
</table>

Please highlight how you wish to receive the requested information:

<table>
<thead>
<tr>
<th>Collect in person from OH Department</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Post to main postal address - please include postcode</td>
<td></td>
</tr>
</tbody>
</table>

Date of request ______________________
Release of Occupational Health Records
Checklist

Name of Client:  
DOB:  
Name of Person/Organisation requesting copy of records and date:  

<table>
<thead>
<tr>
<th>Administrator</th>
<th>Yes</th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>copy of the original consent form</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Notes from THEREFORE</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Notes from Cohort</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attachments from Cohort</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Clinician</th>
<th>Yes</th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>Have the notes been checked against the consent form</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Have psychology notes been excluded</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Has the client had the opportunity to checked the notes to be released</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Is an invoice required for release of notes to solicitor</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Records checked by:  Name:  
Date:  

Records sent by:  Name:  
Date:  

Copy of this form to be attached into Cohort record.
Appendix 6:

Example of wording for email advising staff of transfer of Occupational health records:
Example of Notification of transfer of OH records letter

Date
Ref
Name & Address

Dear

Re: Transfer of Occupational Health Records

Your Occupational Health service is currently being provided by the Occupational Health Department at Newcastle NHS foundation Trust. This service will cease from Date. As from Date your Occupational Health Service will be provided by Name of OH Provider.

I am therefore requesting your consent to transfer your Occupational Health records to the new Occupational Health provider.

I will be arranging the transfer of your occupational health records week commencing Date.

If you have any objections to the transfer of your occupational health records please contact me on Contact details before Date.

Yours sincerely
Appendix 7:

As a participating service in the Occupational Health Records Transfer Scheme, please complete this confirmation of receipt form and return it as soon as possible to the OH Service that has forwarded the records to you.

1. Details of Sending NHS OHS:
   Name of Head of Occupational Health Service:
   Address of Service:
   Post Code
   Phone Number
   Contact Person

2. Details of Receiving NHS OH Service:
   Name of Head of Occupational Health Service:
   Address of Service:
   Post Code
   Phone Number
   Contact Person

Check list to released OH records to information asset owner as part of transfer of contract
Appendix 8
Private & Confidential

Our Ref: /  

Date:

Name:  
Address:

Dear

Please find enclosed … files containing Occupational Health Records for …….

Records were collected ………………… on behalf of ……………

Name of employee collecting records ………………………………………………………
(Please print name)

Signature of employee collecting records …………………………………………………

Name of OHS employee releasing records …………………………………………………
(Please print name)

Signature of OHS employee releasing records ……………………………………………
The Newcastle upon Tyne Hospitals NHS Foundation Trust

**Equality Analysis Form A**

This form must be completed and attached to any procedural document when submitted to the appropriate committee for consideration and approval.

**PART 1**

1. **Assessment Date:** 01.03.2017

2. **Name of policy / strategy / service:**
   - Occupational Health Records Management and Retention Operational

3. **Name and designation of Author:**
   - Chris Wright (Clinical Lead Manager Occupational Health)

4. **Names & designations of those involved in the impact analysis screening process:**
   - Chris Wright (Clinical Lead Manager Occupational Health)

5. **Is this a:**
   - Policy [x]
   - Strategy [ ]
   - Service [ ]
   - Is this:
     - New [ ]
     - Revised [x]
   - Who is affected
     - Employees [x]
     - Service Users [ ]
     - Wider Community [ ]

6. **What are the main aims, objectives of the policy, strategy, or service and the intended outcomes? (These can be cut and pasted from your policy)**
   
   This policy outlines the fundamental requirements of sound clinical records management processes in order to ensure that a comprehensive system for the storage and retrieval of clinical records is in place.

   This policy outlines the roles and responsibilities of all parties. It outlines the requirements for Occupational Health records management and retention.

7. **Does this policy, strategy, or service have any equality implications?**
   - Yes [ ]
   - No [x]

   If No, state reasons and the information used to make this decision, please refer to paragraph 2.3 of the Equality Analysis Guidance before providing reasons:
There are no implications. All records are held and managed in accordance with the policy irrespective of demographics / race / religion / gender / medical conditions.
### 8. Summary of evidence related to protected characteristics

<table>
<thead>
<tr>
<th>Protected Characteristic</th>
<th>Evidence, i.e. What evidence do you have that the Trust is meeting the needs of people in various protected Groups</th>
<th>Does evidence/engagement highlight areas of direct or indirect discrimination? If yes describe steps to be taken to address (by whom, completion date and review date)</th>
<th>Does the evidence highlight any areas to advance opportunities or foster good relations. If yes what steps will be taken? (by whom, completion date and review date)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Race / Ethnic origin (including gypsies and travellers)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sex (male/ female)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Religion and Belief</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sexual orientation including lesbian, gay and bisexual people</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Age</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Disability – learning difficulties, physical disability, sensory impairment and mental health. Consider the needs of carers in this section</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Gender Re-assignment</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Marriage and Civil Partnership</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Maternity / Pregnancy</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### 9. Are there any gaps in the evidence outlined above? If ‘yes’ how will these be rectified?

No

### 10. Engagement has taken place with people who have protected characteristics and will continue through the Equality Delivery System and the Equality Diversity and Human Rights Group. Please note you may require further engagement in respect of any significant changes to policies, new developments and or changes to service delivery. In such circumstances please contact the Equality and Diversity Lead or the Involvement and Equalities Officer.

Do you require further engagement? Yes [ ] No [x]

### 11. Could the policy, strategy or service have a negative impact on human rights? (E.g. the right to respect for private and family life, the right to a fair hearing and the right to education?)

No
PART 2

Name:
Chris Wright

Date of completion:
01.03.2017

(If any reader of this procedural document identifies a potential discriminatory impact that has not been identified, please refer to the Policy Author identified above, together with any suggestions for action required to avoid/reduce the impact.)