

YORK DIAGNOSTIC IMAGING

Records Management Policy

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Document Control

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Document History

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1. Aim

York Diagnostic Imaging (YDI) recognises the importance of effective records management and this document sets out the policies and procedures that ensure that clinical records are managed in accordance with the principles of the Data Protection Act. This policy should be read in conjunction with the YNIC Data Protection Policy.

Data may only be used for the specific purposes for which they were collected.

Data must not be disclosed to other parties without the consent of the individual whom it is about, unless there is legislation or other overriding legitimate reason to share the information (for example, the prevention or detection of a crime or safeguarding). It is an offence for other parties to obtain this personal data without authorisation.

Individuals have a right of access to the information held about them, subject to certain exceptions (for example, information held for the prevention or detection of crime).

Personal information may be kept for no longer than is necessary and must be kept up to date.

Personal information may not be sent outside the European Economic Area unless the individual whom it is about has consented or adequate protection is in place, for example by the use of a prescribed form of contract to govern the transmission of the data.

Subject to some exceptions for organisations that only do very simple processing, and for domestic use, all entities that process personal information must register with the Information Commissioner's Office.

The departments of a company that are holding personal information are required to have adequate security measures in place. Those include technical measures (such as firewalls) and organisational measures (such as staff training).

Subjects have the right to have factually incorrect information corrected (note: this does not extend to matters of opinion).

2. Scope

For the avoidance of doubt, in respect of all clinical imaging YDI acts as a data processor only. The referring clinician or referring body are the data controller.

This policy applies to all clinical examinations performed at YDI. The management of participant records and research data are explicitly covered in the YNIC Data Protection Policy.

3. Roles and Responsibilities

3.1 The Director has overall responsibility for the service delivered.

3.2 The Registered Manager is responsible for ensuring that:

- All staff are made aware of and understand their role with regards to this policy.

3.3 All employees are responsible for ensuring that:

- They understand and act in accordance with the policy.
- Any acts by others that breach this policy are immediately brought to the attention of the Registered Manager.

4. Paper Records

Typically patient records comprise a referral form and subsequently a clinical report. Brief patient details are also recorded in the system operators clinical log book.

4.1 Referral forms and reports. These records contain patient sensitive data. When not in use, these records are stored in the secure reception office.

- 4.2 The patient log book holds limited identifiable information as required by MRHA. The log book is kept in the secure scanner control room to which access is restricted.
- 4.3 Digitisation. All paper records will be digitised upon receipt and stored under a unique YDI patient reference number. Upon completion of the patient episode (referral to report dispatch) all paper records will be destroyed using a cross cut shredder.
- 4.4 Backup. Digitised paper records will be automatically backed up to multiple locations at least once per day.
- 4.5 Retention. Digitised paper records will be retained for at least 10 years.

5. Image Data

For clinical patients; image data is stored on the YDI PACS. 1 copy of the Image data is stored on CD until the report has been received at which point it is sent with a copy of the report to the referring clinician. The YDI PACS is automatically backed up to multiple locations at least once per day.

- 5.1 Image data can be stored on CD/DVD or on the dedicated York Diagnostic Imaging PACS.
- 5.2 Image data will be transferred to the York Diagnostic Imaging PACS at the end of each examination.
- 5.3 The successful transfer of image data transferred to CD/DVD will be verified by reading the CD using third party software. Images will not be removed from the scanner until successful image transfer has been verified.
- 5.4 The successful transfer of Image data transferred to the York Diagnostic Imaging PACS will be verified using the data browser. Images will not be removed from the scanner until successful image transfer has been verified.
- 5.5 Retention. Images will be retained by YDI for a minimum of 10 years.

6. Breaches

- 6.1 Any breach to this policy should be raised with the Registered Manager or Data Protection Officer for investigation.

7. Review

- 7.1 This policy will be reviewed by the Director, and Registered Manager every 3 years or as necessary in response to changes in legislation or national guidance.