

Witness Name: Valerie Watts

Statement No.: WITN0756001

Exhibits: WITN0756002-
WITN0756011

Dated: 18 December 2018

INFECTED BLOOD INQUIRY

WRITTEN STATEMENT OF VALERIE WATTS, CHIEF EXECUTIVE, REGIONAL HEALTH AND SOCIAL CARE BOARD (NORTHERN IRELAND)

I, Valerie Watts, will say as follows:-

1. Records Management within the Regional Health and Social Care Board (HSCB) is decentralised with each Directorate having responsibility for the management of their records through all stages of the record life cycle. A central Information Governance Team sitting within the Corporate Services Directorate develops and maintain associated records management policies and systems to support this arrangement however the day to day management of records remains the responsibility of the disparate business areas.
2. The current HSCB records management policy is based on the principles and guidance published in the Department of Health document known as 'Good Management, Good Records' (GMGR); access to GMGR is available online on the Department of Health website at the following link: <https://www.health-ni.gov.uk/topics/good-management-good-records>
3. The first version of GMGR was issued in December 2004; it has been further reviewed with the current version of GMGR being issued in 2011. GMGR is the definitive records management guidance document for Health and Social Care (HSC) organisations in Northern Ireland and the detailed Retention and Disposal advice in Section Two of the document has been formally adopted

by all HSC organisations as their Retention and Disposal Schedule. GMGR provides guidance for a wide variety of record types in all formats identifying minimum retention periods, any relevant legislation/derivation impacting on the management of the record and details the final action required for the record type – this could be disposal, further review or could be permanent preservation by passing to the Public Record Office for Northern Ireland (PRONI).

4. HSCB records are archived when the record is no longer active and the relevant files have been closed to further entries. For hard copy records these are physically boxed and placed into archive storage. Physical storage can either be on-site in specified storerooms or can be off-site via the contracted services of a third party record storage provider. Guidance has been provided to staff on archiving hard copy records.
5. In regard to electronic records; the HSCB has in place an Electronic Document and Records Management System known as Meridio. The system has the functionality to allow documents to be declared as records and once this has happened the record is preserved and can no longer be amended or changed. Documents and Records are stored in a filing structure in Meridio known as a Fileplan. Folders are created in the Fileplan and when the folders are closed and not in receipt of further content the system allows the retention periods detailed in GMGR to be applied to that folder and a similar process of review/disposal/permanent preservation is followed.
6. Other electronic records held by the HSCB may be held outside of Meridio in Shared Network Drives, Computer Hard Drives, and in portable storage devices. These areas and the electronic records that they contain are managed solely by the individual members of staff who are responsible for the records. Staff have been provided with the relevant training and awareness material to allow the management of these records in line with the official policy.
7. HSCB and Legacy records are held in a number of repositories which include: HSCB Offices – current records, both paper records (89 filing cabinets, 77 filing cupboards, 18 large revolving times 2 cabinets, 2 fireproof safes) and electronic records, are held in HSCB offices located at the following four main locations:

Headquarters (Linenhall Street)
Belfast

Southern Offices (Tower Hill)
Armagh.

Northern Offices (County Hall)
Ballymena

Western Offices (Gransha Park)
Londonderry

8. Archive Stores – Gransha Park (four rooms containing approximately 200 files each) and Towerhill offices (basement store containing approximately 600 files) have archive store facilities storing paper records. These include both legacy records and HSCB records. Individual Directorates are responsible for maintaining an inventory of their records held in these locations – see Paragraph 1 above.
9. PRONI – records that have met their retention period and are noted for permanent preservation have been transferred to the PRONI offices. This relates to legacy records only as the HSCB was created in 2009 and to date no records have met the retention period for permanent retention. PRONI have indicated that 177 files have been placed in their archive from the Area Health and Social Services Board.
10. Electronic Archives – the legacy organisations and HSCB hold electronic records on Shared Network Drives. Each Directorate has a shared network drive and this system is hosted by the Business Services Organisation (BSO). It has not been possible to quantify how many files are held in each of these Drives.
11. Meridio – this is an Electronic Document Records Management system introduced by the Legacy Eastern Health and Social Services Board (EHSSB) in 2008, upgraded during 2013 and implemented across all of the HSCB offices in 2014. This is a repository for electronic records and used by staff across the organisation. There are restrictions to the file types that can be stored in Meridio. Meridio contains documents and records created from 2008 onward and as at 09/10/18 a total of 1014973 documents and records were contained.
12. A database holding details of paper records held by the legacy EHSSB known as RIMS is also accessible - this system provides an inventory of paper records, their last known status (held or disposed) and their storage location. This system is hosted by the BSO on behalf of the HSCB.

13. Oasis – paper records predominantly from Linenhall Street and County Hall offices are held in Oasis off site storage. At 31/07/18 there are 3776 boxes of files held in Oasis storage. Boxes on average hold between 3 and 25 files dependant on file content.
14. Morgan Document Security– a small number of Finance records are held in Morgan Document Security off site storage. Currently there are 11 boxes of archived records in storage with Morgan Document Security. In 2014 HSCB made a decision to hold all records in one off site location – Oasis storage. The costs involved in transferring records from Morgan Document Security to Oasis were significant. A decision was taken to leave the small number of records with Morgan's until they meet their retention period.
15. Archived records which have met the required retention period identified in GMGR (see response to question one above) and which are marked for Permanent Preservation need to be reviewed by PRONI before being taken into the national archive. Since the creation of the HSCB in 2009 there haven't been any records placed into PRONI by the HSCB. Where this is to happen the relevant business area will liaise with the Information Governance Team, make them aware of the records needing to be reviewed by PRONI and the Information Governance Team will make the necessary arrangements with PRONI to come on-site and review the records. Receipts for the records are provided by PRONI and details of the transfer are recorded in the relevant File inventory.
16. The Public Records Act (Northern Ireland) 1923 and the Disposal of Documents Order, 1925 are the key pieces of legislation with which the HSCB is required to comply in managing records. It is our understanding following interactions with the Northern Ireland Blood Transfusion Service (NIBTS) and the Department of Health, Northern Ireland (DOH, NI) that the following guidance was in place in the Northern Ireland health system prior to GMGR:
- i) Circular HMC 75/62 – Preservation and Destruction of Hospital Service Records. This circular was issued by the Northern Ireland Hospitals Authority and set out arrangements for the preservation and disposal of hospital service records **[WITN0756002]**.
 - ii) DHSSPS Circular HSS (OS3) 1/83 – Retention of Personal Health Records. In 1983 this circular amended (but did not cancel) Circular HMC 75/62 and recommended new minimum periods of retention for personal health records (other than records held by the Central Services Agency) to take account of the provisions of

the Limitation (Northern Ireland) Order 1976 and the Congenital Disabilities (Civil Liability) Act 1976 **[WITN0756003]**.

- iii) HSSE (SC) 3/96 – Retention of Personal Health Records (for possible use in Litigation). This circular updated guidance in Circular HSS (OSC) 1/83 and HMC 75/62: It recommended new minimum periods of retention for maternity records and x-ray films; allowed Boards/HSS Trusts to determine what should be regarded as a permanent health record; and provided new guidance on the destruction of confidential health records. It did not apply to records held by the Central Services Agency **[WITN0756004]**.
- iv) Good Management, Good Records – Guidelines for Managing Records in Health and Personal Social Services Organisations in Northern Ireland (2004). In February 2003, following the publication of the Northern Ireland Audit Office Report on Compensation Payments for Clinical Negligence, the Departmental Board agreed the need for a strategic approach to records management in the Health & Personal Social Services (HPSS). The Health and Social Care Steering Group was appointed in 2003, under the leadership of the then Deputy Chief Medical Officer, Dr Ian Carson. The Steering Group's responsibilities included:
 - Commissioning a baseline audit and survey of records management within the HPSS.
 - Developing a HPSS Records Management Policy Statement.
 - Developing a Northern Ireland equivalent of the Department of Health (DoH) "For the Record Circular".

As a result of the work of the Steering Group, a Records Management Controls Assurance Standard was developed, setting out the standard of record keeping required within Health and Social Services. A HPSS Records Management Policy Statement was developed and issued to the HPSS on the 3 November 2004.

The Northern Ireland equivalent to the DoH 'For the Record' circular 'Good Management, Good Records' was published in December 2004 and offered an overview of the key issues and solutions, and best practice for HPSS teams to follow when preparing a records management strategy. It set out the minimum retention periods for HPSS records of all types, except for GP medical records, providing organisations with a model disposal schedule for files. It also included advice about the Freedom of Information Act and indicated which records were most likely to be appropriate for permanent preservation **[WITN0756005]**.

- v) Good Management, Good Records – Guidelines for Managing Records in Health and Personal Social Services Organisations in Northern Ireland (2011). The review of 'Good Management Good Records' in 2010-2011 considered the revised Department of Health (DoH) Records Management NHS Code of Practice (2009). It also took account of current legislative requirements, advice from professional bodies and current best practice in relation to records management and the changing environment in relation to electronic records. The experiences of the Department, Health and Social Care Organisations, Public Safety and those working under contract to them were also considered i.e. GPs, Community Pharmacists and Dentists. Where appropriate the opinion of clinicians and professionals was sought. The revised Good Management Good Records was issued in November 2011 replacing 'Good Management Good Records' 2004, Circular HSS (PCCD)1/2000 – Preservations, Retention and Destruction of GP Medical Records and Circular HSS(F) 14/03 – Preservation and Destruction of Financial and Associated Records. The 2011 'Good Management Good Records' now applies to all records held by the HSC, the Department and Public Safety **[WITN0756006]**.
- vi) Controls Assurance Standards were first introduced in 2004. The Records Management Controls Assurance Standard 2004 required HPSS organisations to evidence how they complied with the

Standard from April 2004. The Standard sought that “**A systematic and planned approach to the management of all records is in place within the organisation that ensures, from the moment a record is created until its ultimate disposal, that the organisation can control, both the quality and quantity of information it generates; can maintain that information in a manner that effectively services its needs and those of its stakeholders; and it can dispose of the information appropriately when it is no longer required.**” Organisations were required to annually assess themselves against this Records Management Controls Assurance Standard **[WITN0756007]**.

- vii) Records Management Controls Assurance Standard 2009 – Upon review the original 10 criteria in the 2004 Records Management Controls Assurance Standard were consolidated into 6 criteria in April 2009 **[WITN0756008]**.
- viii) Information Management Controls Assurance Standard 2013 – A further review of the Records Management Controls Assurance Standard was completed in April 2013 with the focus shifting from purely Records Management to an overarching Information Management Standard, with Records Management remaining a key strand. HSC organisations were required to report against the new standard in April 2014 **[WITN0756009]**.
- ix) Information Management Assurance Checklist 2018 – In 2018 the Controls Assurance process was further reviewed by the Department of Health. The Information Management Controls Assurance Standard was subsequently replaced with the Information Management Assurance Checklist **[WITN0756010]** and associated Information Management Assurance Guidance **[WITN0756011]** with organisations required to complete the Assurance Checklist from April 2018 onward.

Statement of Truth

I believe that the facts stated in this written statement are true.

GRO-C

Signed