GUIDANCE FOR STAFF CARRYING PATIENT RECORDS OR OTHER CONFIDENTIAL / SENSITIVE INFORMATION OFF-SITE

Who is this guidance for?

This is for any staff of the organisation including temporary, agency or bank staff and staff under contract, who are transporting confidential, sensitive or personally identifiable information.

It does not apply to: transportation by porters, internal or external mail, or transport of records between hospitals by ambulances or couriers.

What is covered?

This includes, but is not limited to, any patient records, sensitive financial, estates or personnel records, contracts, and confidential information relating to GP and other independent contractor practices. This information is hereafter called ‘records’ in the remainder of the guidance. If in any doubt talk to your line manager.

Are formats other than paper covered?

- Any hard copy format is covered, including X rays, casts / moulds. For guidance on electronic records you are strongly advised to read the leaflet ‘Information Security: a good practice guide for NHS staff in Leicester, Leicestershire and Rutland’, Version 4, September 2010 and ‘Using laptops and other portable equipment’, Version 4, September 2010. Both are produced by, and available from, the Health Informatics Service. You can also consult relevant organisational policies and procedures e.g. ‘Information Security Policy and Detailed Guidelines’, available on the organisations internet.

- At local induction managers need to make clear to the individual what records they can take off-site and what, if anything, should never be removed without prior permission. This should ensure clarity of understanding and also that the individual does not need to get approval for individual records.

- No records should be removed from base unless they are needed for work.

- It is recognised that healthcare professionals may find it necessary to remove patient’s health records from their base, to facilitate their daily practice of seeing patients in community setting. To reduce the risk of loss of such records and to reduce the risk of breaches of confidentiality there are various considerations to be made, based on best practice. Only those records required for the patients being seen in the community should be removed. Ideally, records should not be removed for general administration purposes, e.g. writing reports. There should be a trace or booking out reference kept at the base from which records have been removed.
It is important that other staff know where the records have gone. Use the tracking system in place. If one does not exist then discuss creating one with your line manager. This does not have to be complex.

Records should be transported from the office in suitable covers or containers so that they are protected and not in danger of being dropped or damaged. They should be handled carefully when being loaded or unloaded. Vehicles must be fully covered so that records are protected from exposure to weather, wind, excessive light and other risks such as theft.

Records should not usually be left unattended in cars. However, it is acceptable to do so if there is a definite risk that they will be viewed by unauthorised personnel, damaged or stolen if they are taken into the building. Risk assess the situation and use your professional judgement to decide whether it will be safer to take the records into the house or to leave them in the car. If left in the car the records should be placed in a locked car boot out of sight, with the car alarm on if there is one.

Cars should be parked in a secure and well-lit location.

At the end of a working shift records it is best practice to return the records to the base office.

If the member of staff does not return to base at the end of a shift, records must be removed from the car and care taken to ensure that members of the family or visitors cannot gain access. Ideally, records should be stored and carried in a secure case, and kept out of sight. Staff should ensure that they place the secure case in a cupboard or similar, as soon as they enter the house. If they do not have a secure case, notes should be stored in a locked cupboard or cabinet with access only by the member of staff.

If the staff member is involved in a road traffic accident / incident which necessitates the car being left on the roadside or taken to a garage, records should be removed if possible. If this is not possible the police should be informed that confidential records are in the car. The line manager and/or On-Call manager should be contacted and made aware of the situation. They should ensure that an incident form is completed and do whatever they can to help retrieve the records.

If a member of staff’s car is stolen or broken into and records stolen, the police should be informed, the line manager and/or on-call manager should be contacted immediately and an Incident form completed along with the Lost Clinical Records Proforma.

Staff should not attempt to remove records from a burning car. The emergency services should be informed that records are in the car. The line manager and/or on-call manager should be contacted immediately and an incident form completed.
It is inappropriate to work on records whilst travelling by public transport or in any non-NHS, non-secure environment e.g. cafes.