



FREEDOM OF INFORMATION REQUEST

Please note the text of this request has been reproduced exactly as received.

FOI Reference number: 01/2021

Date: 12 August 2022

Request:

I seek a response to the following under FOI legislation:-

1. Copy of NIPB policy document relating to handling, storage, safe keeping and access by NIPB staff to medical documentation held by the Board relating to Injury Benefit awards.

Answer: See attached a copy of the Board's Records Management Policy. Please note that this document is currently under review.

2. Confirm specifically what records are maintained by the Board on each occasion NIPB staff access and read any individual medical reports/documentation held in connection with Injury Benefit awards.

Answer: No such records are maintained as staff working on Injury on Duty cases are required to process medical reports and documentation as part of their daily duties.

3. In respect of my individual medical records held by NIPB please provide copy of records of any examination/access to my medical information, including medical information relating to me held by NIPB electronically.

Answer: This question relates to the requestor and falls outside the scope of FOI legislation and will be considered separately under data protection legislation. As such the exemption at Section 40 (1) (Personal Data of the applicant) of the Freedom of Information Act 2000 is engaged.

4. Confirm the precise internal administrative authorisation procedure for NIPB staff accessing and examining medical documentation held by the Board in connection with Injury Benefit awards

Answer: No such "internal administrative authorisation procedure" exists as staff working on Injury on Duty cases are required to process medical reports and documentation as part of their daily duties.

5. In respect of appeal papers in my case sent recently to DOJNI for the purpose of appeal, please confirm or otherwise all medical documentation was sent confidential, sealed, with instruction from NIPB to DOJNI that the medical documentation should be opened solely by the appointed IMR. If my medical documentation was sent to DOJNI unsealed may I please have an explanation for this course of action?

Answer: This question relates to the requestor and falls outside the scope of FOI legislation and will be considered separately under data protection legislation. As such the exemption at Section 40 (1) (Personal Data of the applicant) of the Freedom of Information Act 2000 is engaged.

If you have queries about this request or the decision please contact the Board quoting the reference number above. If you are unhappy with the service you have received and wish to make a complaint or request a review you should write to the Board's Chief Executive at the following address:

Northern Ireland Policing Board
Waterside Tower
31 Clarendon Road
Clarendon Dock
Belfast BT1 3BG

Email: foi@nipolicingboard.org.uk

You should contact the Board within 40 working days of this response.

If you are not content with the outcome of your complaint, you may apply directly to the Information Commissioner. Generally, the Information Commissioner's Office cannot investigate or make a decision on a case unless you have exhausted the complaints procedure provided by the Board. The Information Commissioner can be contacted at:-

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
SK9 5AF

Telephone: - 0303 1231114

Email: - ni@ico.org.uk

Please be advised that Policing Board replies under Freedom of Information may be released into the public domain via our website @ www.nipolicingboard.org.uk.

Personal details in respect of your request have, where applicable, been removed to protect confidentiality.

NORTHERN IRELAND POLICING BOARD

Records Management Policy

1. INTRODUCTION

- 1.1 Records Management is the term used to describe an administrative system by which the organisation seeks to control the creation, retrieval, storage and the preservation or destruction of its records. It is the policy of the Northern Ireland Policing Board to provide a system to maintain, retain or dispose of its records in accordance with legislation and administrative requirements.
- 1.2 This policy statement should not be read in isolation. It is recommended that account be taken of:
- The Lord Chancellor's Code of Practice on the Management of Records under Section 46 of the Freedom of Information Act 2000
 - The Board's Records Management Handbook which sets out in more detail the day to day procedures, and
 - The Board's Records Management Retention and Disposal Guidelines.

2. PURPOSE OF THE POLICY STATEMENT

- 2.1 This policy provides guidance on effective records management throughout the Board.
- 2.2 It sets out the standards for records management to support its business needs, accountability and statutory requirements.
- 2.3 These standards are based on the premise that records should be systematically managed.
- 2.4 This policy also outlines:
- The roles and responsibilities of all staff involved in records management including the responsibility of senior management
 - How to effectively manage records, and
 - The way in which compliance with the policy and its supporting standards, procedures and guidance will be monitored.

3. SCOPE

3.1 This policy:

- Applies to all records (current, closed, historical and electronic) created and maintained by the Board (and PANI)
- Applies to all records regardless of the medium (paper or electronic) and regardless of form (text, graphics, video, voice etc), and
- Applies to all staff of the Board.

4. LEGISLATION AND STANDARDS

4.1 The Board recognises its regulatory requirements as a public authority, and is committed to the principles and practices set out in the following legislation and standards:

- Public Records (NI) 1923
- Disposal of Documents Order (NI) 1925
- Environment Information Regulations 1992
- Data Protection Act 1998, and
- Freedom of Information Act 2000.

4.2 Effective records management will not only meet these requirements but enable the Board to:

- Access records when required
- Make better use of space and storage facilities both physically and electronically
- Make better use of staff time
- Have improved control over records, and
- Comply with best practice, other Board policies, and reduce costs.

5. AIMS AND OBJECTIVES OF THE RECORDS MANAGEMENT POLICY

5.1 The aims of the records management policy are:

- To support the Board in the effective and efficient delivery of its statutory duties;
- To improve the quality of records;
- To reduce the amount of paper stored;

- To maintain, retain or dispose of the records in accordance with the Board's needs and legislative requirements;
- To avoid random destruction of records;
- To ensure the earliest possible removal of records once they cease to be required;
- To ensure the permanent preservation of those records of long-term significance; and
- To reduce bureaucracy.

5.2 The detailed objectives are:

- To formalise record control systems
- To improve information retrieval by good filing systems and the use of information technology
- To establish and maintain a retention control system by the use of file plans and disposal schedules
- To investigate and make recommendations on the conversion of records to alternative media
- To produce and maintain an up to date records management procedural manual, and
- To give the rationale behind decisions made (an audit trail).

6. BOARD'S COMMITMENT TO RECORDS MANAGEMENT

- 6.1 The Board records are its 'corporate' memory and as such are a vital asset for ongoing operations, providing valuable evidence of business activities.
- 6.2 The Board is committed to the creation, storage, management and eventual disposal of records in a manner which is compliant with this policy and which accurately details the functions of the organisation.
- 6.3 The Board is committed to providing the necessary education and awareness that will allow staff to perform their records management responsibilities. Training will include workshops, interactive e-learning tools and regular briefings.

7. RESPONSIBILITY FOR RECORDS MANAGEMENT

- 7.1 The Communications Manager has overall responsibility for the Board's Records Management policy. Day to day implementation of the policy rests with Heads of Branches and staff within the organisation.
- 7.2 The Communications Manager shall:
- Have responsibility for overseeing the implementation and maintenance of the policy

- Create the Board's records management procedures and practices and ensure these comply with its obligations and responsibilities as a public authority
- Monitor the functionality of the Board's records management system

8. RECORDS REGISTRATION

- 8.1 Individual branches have completed information surveys / audits in order to determine what series of records are held.
- 8.2 Procedures will be developed to ensure that records can be quickly and easily accessed and that a system is in place to register, index and classify documents. This system will be implemented, where possible, across all business areas within the Board to achieve uniformity.
- 8.3 The management of the records will include procedures for referencing, indexing and, where necessary, security marking of records. In designing a management system consideration will be taken of both existing records as well as planning for future records to be created.
- 8.4 A tracking system will be implemented to ensure that the location of particular records can be established and easily retrieved.
- 8.5 Communications Branch will store records that are no longer required for administrative use by business areas, centrally to await Public Record Office of Northern Ireland (PRONI) assessment. The Board has in place a contingency plan to provide protection for important records in the event of destruction or mishap i.e. fire, flood etc.

9. REVIEW / TRANSFER OR DISPOSAL OF RECORDS

- 9.1 The Board will ensure the timely and effective review, transfer or disposal of public records. In reviewing records for public release, the Board will ensure that public records become available to the public at the earliest possible time in accordance with the Freedom of Information Act.
- 9.2 The Board will ensure that it operates effective arrangements to determine:
- Which records should be selected for permanent preservation
 - Which records should be released to the public, and
 - In conjunction with PRONI, which records should be disposed of.

- 9.3 Procedures will be in place to record the decisions taken in relation to review, transfer or disposal of all Board records.
- 9.4 Where a record earmarked for disposal becomes the subject of a request for information the destruction will be delayed until the request has been satisfied or in the case of a refusal, until any complaint and appeal mechanisms have been exhausted.

10. HISTORICAL RECORDS

- 10.1 Records deemed to have permanent value, for legal administrative or research purposes, will be protected by the Board. Those records selected will be transferred to PRONI for storage, after 20 years or when they are no longer of administrative use.

11. ELECTRONIC RECORDS

- 11.1 The principles of this policy equally apply to the management of the Board's electronic records. There are however different means of addressing compliance where the information has been captured electronically.
- 11.2 To effectively maintain the Board's electronic records the system will ensure:
- Maintenance of structured folders logically grouped together
 - Management of appropriate security arrangements to ensure that the integrity of the records can be maintained i.e. operating password systems so that unauthorised users cannot access material, protections from loss or destruction etc
 - Allowing, when necessary, the transmission of electronic records from one system to another, and
 - Cross-referencing of electronic records, including e-mails, to the corresponding paper records.

12. SECURITY OF RECORDS

- 12.1 Records management procedures will ensure that records can be maintained securely, with appropriate safeguards and access controls in place. Staff will be trained on how to use the systems in order to realise potential benefits for the Board.

13. COMPLIANCE, MAINTENANCE AND REVIEW OF POLICY

- 13.1 The Communications Manager will oversee the Board's record management procedures to ensure compliance with this policy statement and any ensuing policies and to incorporate any major changes that need to be made.
- 13.2 The Communications Manager is responsible for maintenance of this policy statement.
- 13.3 The Communications Manager reviewed this record management policy in April 2012 and January 2015. The policy will next be reviewed in April 2018.