

STFS INFORMATION MANAGEMENT POLICY August 2008 Edition

1. Confidentiality & Disclosure

STFS will do everything possible to maintain the confidentiality of its trainees. It also has a duty of care for the confidentiality of those who work at or for STFS. All staff have a personal responsibility to ensure the confidentiality of trainees and staff. Patient safety is, however, the overriding concern of all healthcare professionals and “those responsible for training have a responsibility to share information about trainees that is relevant to their development as a doctor...” (para 121, The New Doctor, GMC)

2. Breaches of Confidentiality

A breach of confidentiality could result in disciplinary action in accordance with the relevant Disciplinary Procedure. In addition, adherence to codes of conduct are required for membership of professional bodies and any breach of confidentiality may lead to independent action by these professional bodies where the person who is deemed to have breached confidentiality is a member.

3. Correspondence – General

There will be many instances where STFS will be required to correspond with appropriate staff within other organisations, often NHS Trusts (e.g. DMEs, FTPDs, MEMs, etc). All care should be taken to minimise the risk of any sensitive/confidential information being inappropriately circulated. Both trainees and staff will be expected to correspond with others in a clear, concise manner that takes into account the needs of the audience and maintains an appropriate level of professionalism. Correspondents should remember that those about whom they are writing have the right to request access to documentation that refers to them under the Data Protection Act. In addition, individuals may also request disclosure under the Freedom of Information Act 2000. The KSS Deanery Fol Policy is located at <http://www.kssdeanery.ac.uk/primaryframeset.html>.

4. E-mail for Correspondence

As STFS will need to communicate with so many different people, the principal method used will be e-mail. Every attempt will be made to ensure that information is circulated only to appropriate, named individuals. When staff transmit sensitive/confidential information regarding an individual trainee, they will flag the message as being confidential, will include “confidential” in the Subject section and will not include the trainee’s name in the Subject section. The trainee’s name will, however, appear in the body of the message, usually after the greeting line.

Example:

Dear Dr x

Re: Dr John Smith (F1)

Body of message

It is best practice to refer to only one trainee in any individual communication.

5. E-mail for Distributing Data

There will be many instances where STFS will be required to distribute data containing personal information (such as spreadsheets to advise Trusts of trainee allocations etc) to appropriate staff within other organisations, often NHS Trusts, UK Foundation Programme Office etc. When sending data of this sort, spreadsheets will be password protected and a second, separate e-mail containing the password will be sent.

6. Post

It will occasionally be necessary for STFS to communicate with Trusts/trainees by paper. An indication of the carriage type to be used for different classes of document is given below:

1st Class Mail

- Standard correspondence with Trusts/Trainees

Recorded/Special Delivery

- Confidential/sensitive correspondence with Trusts/Trainees
- Transfer of Information Forms
- Transfer of Application Forms between STFS sites

Courier

- Bulk Transfer of Trainee files between STFS sites
- Documentation relating to Appeals Hearings

STFS staff will ensure that documents are securely contained within appropriate envelopes/boxes (usually securing larger items with tape around the seal and edges). STFS staff will also ensure that the items are clearly addressed to a named individual and are labelled "Private", "Confidential" etc as appropriate. Ideally, any bulk data should also be signed for upon receipt.

7. Fax

The risk associated with faxing confidential data is that a) the document may be transmitted to the wrong fax number or b) the document may pass through a number of people before arriving with the desired recipient. To this end any sensitive/confidential trainee data sent via fax must follow the procedure below:

- The cover page should first be faxed to the intended recipient
- Telephone contact must be made with the recipient who should confirm receipt of the cover page
- The relevant information is to then be faxed to the recipient
- The recipient should be asked to acknowledge receipt of all pages

8. Telephone

Telephone lines are generally considered to be secure however when disclosing sensitive/confidential information the following precautions should be taken:

- Speaker phones or loudspeaker functions should not be used
- Ensure information cannot be casually overheard
- Information is being disclosed to the correct person
- Action has been taken to verify the caller's identity (e.g. calling back via their switchboard and asking them to provide some form of ID e.g. GMC Number, Date of Birth etc)

9. Other Agencies Chosen Methods to Communicate with STFS

Where agencies request a chosen method of communication with STFS staff should ensure that they stipulate the most appropriate method that minimises risk. External agencies are outside the scope of the policy and it is not for STFS to stipulate how they safeguard sensitive/confidential information, however, there is a reasonable expectation that other agencies will respect STFS practices so long as these do not exceed normal costs of providing the service.

10. Trainee Files - Paper

On entry to STFS, a paper file will be created for each trainee. Typically, this file may contain:

- STFS Registration Form
- F1 Transfer of Information Form
- F1 Application Form & Score Sheets
- F1 Attainment of Competency Form
- F1-F2 Transfer of Information Form
- Foundation Achievement of Competency Document
- Correspondence with/relating to the trainee
- File notes of meetings between the trainee and STFS staff

This file will be confidential and, usually, accessible only by the STFS Director/ Associate Directors, Managers and Administrators.

Any information of a particularly sensitive/confidential nature (e.g. health related information) will be sealed in a separate "Confidential Envelope" within the file and be accessible by senior staff only.

Under certain circumstances, and as agreed by trainees when they complete the STFS Registration Form (see earlier entry), it may be necessary for the STFS Director to share all or part of the contents of this file with a third party e.g. Medical School from which the trainee has graduated, a Foundation Training Programme Director or another Foundation School Director.

Paper files are stored in secure cabinets within STFS offices and will usually be retained in paper format for one-year after completion of F2 (or leaving STFS) before being transferred to an electronic format and stored in a secure location.

11. Trainee Files - Electronic

In addition to paper files, STFS will maintain an electronic record for each trainee within the STFS Trainee Database.

Typically, this file may contain:

Information extracted from the STFS Registration Form (personal details)
Trainee programme details
Free text notes field

This database will be password protected and accessible only by the STFS Director/ Associate Directors, Managers and Administrators.

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APPENDIX A

ARRANGEMENTS FOR DISTRIBUTION OF TRANSFER OF INFORMATION FORMS (ToI)

AIM

As ToI forms may contain confidential, sensitive or personal information it is essential for STFS to ensure that ToI forms are only received by the appropriate individual.

The aim of the process below is to ensure the appropriate dispatch and receipt of ToI forms.

1. STFS will contact each LEP and request that they nominate a named individual to receive ToI forms on behalf of the FTPD
2. ToI forms will be sent by special delivery to the address provided by the LEP recipient
3. STFS will send an e-mail to the recipient notifying them that the ToI forms have been despatched and request that the recipient confirm receipt of the forms on arrival
4. If no confirmation of receipt has been received within 3 working days of sending, STFS will contact the LEP recipient to investigate