File tracking and missing file tracing procedure

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Working for Warwickshire

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Reviews and approvals

V0.1	Corporate Information Manager	March 2015
V1.0	Information Governance Steering Group	April 2015

V1	Information Governance Steering Group	No changes	17 January 2017
V2	Records Manager	Updates to reflect the WCC Data Incident Procedure	1 st July 2019

1.Introduction

Managing information correctly ensures that the council can serve its customers, including protecting some of the most vulnerable people in our society; can defend its actions and decisions; is transparent and provides value for money. Ensuring that paper files, especially those containing personal/sensitive customer information, are managed securely is paramount.

The file tracking and tracing missing files procedure is intended to provide a consistent approach and help on the correct way to manage and track paper files, and actions to take if a file cannot be found.

This procedure applies to paper files held **locally with teams and services** in WCC. A separate procedure applies to files held in archive by the WCC Records Management Service.

This procedure is **mandatory** and must be followed by all staff as part of the council's <u>Information Governance Framework</u> the standard for managing information in the council and is one of the linked procedures in the <u>Information Compliance policy</u> aimed at all staff

This procedure is subject to regular review by the Information Management service to improve handling from user feedback, learning from incidents and application of new technology.

2. Procedure

File tracking

- All paper files are to be stored securely (lockable tambours, filing cabinets, filing rooms etc.).
- Restrict access to only those members of the team/service requiring access to the files. If necessary have one to two staff members to act as local "File Champions". (These could be: Team Administrators, other administrative staff or designated officer, where team or service has no administrative cover).
- A file check-out/check-in process is required, for example a card slip replaces file(s) taken out.
- Record which files are taken out, by whom, and when. This needs to be created in a log on the shared team/service filing system by the File Champions.

• Files are not to be passed on to other colleagues unless the check-in/checkout index is updated by the File Champions with the new borrower's details including name, check-out date and when appropriate return date.

Missing files

- In line with the <u>WCC Incident Procedure</u> missing files should be reported immediately (and in any event within 4 hours) after an individual is aware of a potential *or* actual incident. Inform a line manager or supervisor. This must not delay the incident being reported.
- In line with the WCC Incident Procedure where missing files contain health and social care data and there is a risk to any individuals, this must be reported to the relevant Caldicott Guardian.
- In line with the WCC Incident Procedure it is important to notify key senior staff of the more serious incidents. Human Resources should be notified in the event of disregard for policy or Facilities Management in the event of building security. See the procedure for full details.
- In line with the WCC Incident Procedure. Ensure any vulnerable individuals are informed if put at risk as a result of lost or stolen confidential information.
- An in-depth search should take place immediately.
- Try to establish how many files are missing.
- Check in case the files have been sent to the Records Management Service by mistake or as part of a legitimate deposit of archived records.
- If the loss has coincided with a paper file housekeeping day check whether the files have mistakenly been placed in confidential waste.
- Check whether a colleague has the file either system hasn't been updated with new borrower's details or the new borrower had simply taken the file.
- Check systems as to whether the file is recorded as having been returned and what date and by whom.
- Update file tracking systems and any other business system (e.g. Carefirst/Mosaic) to reflect fact that file(s) is missing.
- Check if the file been shared legitimately with another colleague, team or Service.
- Check if the file been legitimately taken out of the office by an authorised requestor working from home.
- Check behind the filing units (tambours, filing cabinets) etc., including behind internal drawers.

- Note the date and time the file(s) was first noticed missing.
- Note whether the item missing is a whole file or part of the contents of a file. If a whole file is missing note what number file is missing if part of a large series, e.g. file 2 of 10 is missing. If part of the contents of a file, try to establish which parts, e.g. page numbers, section headings etc.

When files are found

- Note the date and if necessary time the file(s) was found.
- Return files to local file storage and record fact on systems (including local file tracking system and business systems eg CareFirst/Mosaic).
- Note how long the files were missing (hours, days, months, years).
- Note who found the file(s) and where they were found.
- Where file(s) have been found, notify the officer investigating the information security breach that the file has been found.
- Where known, note down the reason the files were lost and returned.
- Note any lessons learned and implement.

When files are not found

- As noted above, in line with the <u>WCC Incident Procedure</u> all potential or actual information security incidents should be reported immediately (and in any event within 4 hours.
- Where extensive searches have taken place the file(s) still has not been found, update the officer investigating the information security breach.
- Record the fact that the file(s) is permanently missing on the file tracking log.
- Note any lessons learned and implement.

Further advice

If you need clarification, please look on the Information Management staff webpages or contact the Records Management Service.

www.warwickshire.gov.uk/im

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