DOCUMENT CONTROL SHEET:

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1 Introduction

NHS National Services Scotland (NSS) is committed to having an organised and planned approach to the way we manage our organisational records and information. This not only includes efficient storage and retrieval of information, but also the appropriate and effective disposal of redundant information, both electronic and paper.

A key element is to make sure that all Strategic/Support Business Units (SBU) and Directorates within NSS regularly dispose of information/records that are no longer required for legislative and business requirements. This will assist in compliance with our legal obligations under Freedom of Information (Scotland) Act 2002, Data Protection Act 1998, NHSScotland Information Governance Standards and the NHSScotland Code of Practice on Records Management.

The application of this guidance will be determined by each SBU/Directorate, further advice on this is available from SBU/Directorate Records Management Leads.

This guidance has been produced in line with NSS Corporate Records Management policies and procedures, and further advice on how to effectively manage records is available on the geNSS Corporate Records Management page.

2 Purpose of this guidance

The purpose of this guidance is to provide a practical step-by-step guide on how to carry out data cleansing and the disposal of records, both electronic and paper. This guidance also details issues to consider when deciding whether to dispose of specific records.

This guidance is intended for any member of NSS staff required to review and dispose of NSS records. It is vital that on a regular basis, redundant information, including duplicated documents are removed from the organisation’s filing systems. This will help to ensure that NSS is only ever holding records in accordance with the NSS Document Storage, Retention and Disposal Policy. It will also ensure that capacity and costs associated with the physical and electronic storage of information are managed effectively.

It must be noted that any data cleansing and disposal of records, must be in accordance with NSS Document Storage, Retention and Disposal policy. The NSS Document Disposal Register must also be completed.

3 Definition of data cleansing

Data cleansing is the removal of redundant information held by the organisation. Redundant information may include:

- Duplicate records – e.g. copies of minutes, reports or guidance documents, as only one copy of a document should be retained.
• Drafts of documents which have been superseded – e.g. draft policies, guidelines, reports and strategies, or documents that have been superseded by being declared as a version.
• Documents of short term value or minor importance - e.g. check lists, meeting arrangements, room bookings, car parking requirements, catering arrangements – see Appendix A
• Records outwith their retention period as identified within the NSS Document Storage, Retention and Disposal Policy.

The aim of data cleansing is to identify those records which are still required for business operational reasons and to delete those records that are no longer needed.

4 Data cleansing within NSS

The NSS Document Storage, Retention and Disposal Policy provides guidance on how long specific NSS business records are to be retained, and is vital to comply with our legal requirements under Freedom of Information (Scotland) Act 2002 and Data Protection Act 1998.

The general public have the right to specific information held by NSS, under Freedom of Information and Data Protection legislation, and this information must be provided within a limited timescale. Undertaking regular data cleansing exercises will assist NSS in locating requested information as efficiently as possible (by narrowing the search).

5 Data cleansing responsibilities

All Staff:

Everyone is responsible for maintaining their records, whether stored as paper files, or electronically on the NSS network. All NSS staff create and store information on a regular basis, and should have a clear understanding of what information is stored within their business area.

It is essential that information that is created as part of work duties is not saved on personal drives, memory sticks or the desktop. Personal drives are for the storage of personal information, such as CV’s or personal correspondence.

Line Managers:

For those areas that retain paper copies of records, the business area holding the records is responsible for their effective management. In this case each business area Line Manager will be able to advise on what records can be removed and what must be kept.

SBU/Directorate Records Management Leads:

Each SBU/Directorate within NSS has a Records Management Lead, and part of their responsibility is to provide advice and guidance on how a data cleansing exercise will be undertaken within a business area. The Records Management Lead
will ensure that areas of responsibility for the authorisation of disposing records are mapped before a data cleansing exercise is undertaken within a business area.

Further support and guidance is also available from the NSS Corporate Records Manager.

**Orphan Data:**

In the case of records that appear to have no owner, on a shared drive - for example, the person who created the records has since left; the responsibility for the management of these records reverts back to the business area Line Manager or SBU Director.

### 6 Data cleansing process

Before starting any data cleansing exercise, the first step is a discussion with your Records Management Lead on how data cleansing will be completed in a business area. Each business area will need to identify who is responsible for authorising the disposal of corporate records from SBU/Directorate filing systems.

It is important to remember that the initial data cleansing exercise is likely to be time consuming, and it may be difficult to review each document in a folder. To make this easier, data cleansing can be undertaken at folder level rather than by individual documents. If data cleansing is completed on a regular basis, the process should become less time consuming and therefore manageable as a routine administrative task.

The following process map provides a step-by-step guide on how to complete a data cleansing exercise on a folder.
Data Cleansing Process

Note that if you are unclear of an answer at any stage during this process, seek clarification from your line manager.

Step 1: Records Management Lead to map who has authority to dispose of records listed within the NSS Document Storage, Retention and Disposal Policy.

Step 2: Open the folder to be data cleansed.

Step 3: Are you familiar with NSS Document Storage, Retention and Disposal Policy.

Step 4: Are you authorised to dispose of information within this folder?

Step 5: Does this folder contain duplicate documents?

Step 6: Does the file contain documents which have been superseded by newer draft version or a final version?

Step 7: Does the folder contain documents which are of short term value or minor importance, that are no longer needed?

Step 8: Does the folder contain documents which should have been disposed in accordance with the Document Storage, Retention and Disposal Policy?

Step 9: Log disposal of documents within the NSS Disposal Register.

Step 10: Record folder has been data cleansed.

Data cleansing of folder complete.
**Step 1:**
Before beginning a data cleansing exercise, your Records Management Lead will map who has authority to dispose of specific records within your business area. The NSS Document Storage, Retention and Disposal Policy will provide guidance to Records Management Leads on who is authorised to dispose of these records.

**Step 2:**
Identify the folder to be data cleansed. If this is an electronic folder, double click to open, to begin the data cleansing process.

**Step 3:**
It is important that you are familiar with the NSS Document Storage, Retention and Disposal Policy and aware how long records within your business area need to be retained.

**Step 4:**
The NSS Document Storage, Retention and Disposal Policy also provides advice on who is responsible for authorising the disposal of business records for each specific SBU/Directorate. It is important to confirm that you have authorisation to dispose of documents from the folder you are data cleansing. If you are unclear whether you have authorisation, it is vital that you clarify with your Line Manager who is authorised to disposal of documents within the folder.

**Step 5:**
Duplicate documents could include, copies of the same document, but saved under different file names, or a copy of a record that you do not own. For example, you may hold a copy of minutes for a meeting that you attend, but you do not hold the master record; the master record is held by the meeting secretary. In some cases, business areas may decide to keep a duplicate set for a short period of time, for reasons of convenience. Copies of organisational policies should not be retained within your business area, unless your business area owns and maintains that policy. It is important to remember that there is only a business requirement to hold one official record set; therefore all duplicate copies can be disposed of.

**Step 6:**
When writing a report, or drafting a policy, the document will often go through a number of draft versions before being signed-off as a final version. If these draft versions are no longer required then they can be disposed. Always clarify with your Line Manager if you are unsure whether these documents can be removed from the filing system.

**Step 7:**
The next step is to identify whether the folder holds any documents which are of short term value or of minor importance that are no longer required to be kept. Short term value or documents of minor importance are documents that are used for a short period of time to assist with day-to-day business, but are not classed as a corporate record, and not listed within the NSS Document Storage, Retention and Disposal Policy. Appendix A provides a list of possible documents that may be classed as short term value or minor importance. Records Management Leads will provide advice on additional documents specific to a division that may be classed as short term value or of minor importance. If these documents are no longer required they can be disposed.
**Step 8:**
It is important to identify the documents contained within the folder that have an expired retention period in line with corporate policy. The NSS Document Storage, Retention and Disposal Policy provides guidance on the minimal retention period for specific records that NSS must retain for regulatory purposes. Decisions to keep records beyond the stated periods must be justified and in accordance with Data Protection and Caldicott principles.

It is a requirement under the Freedom of Information (Scotland) Act that organisational records listed within a disposal policy must be registered when disposed. Therefore, records that are to be disposed of in accordance with the NSS Document Storage, Retention and Disposal Policy, must be recorded on the NSS Document Disposal Register. A copy of the disposal register is available on the Corporate Records Management page on geNSS. Once you have completed the register this should be forwarded to your Records Management Lead, who will collate these on a divisional basis. These documents can then be disposed of in a secure manner.

**Step 9 and Step 10:**
It is advisable to record that the folder has been data cleansed, and if possible identify when the folder is due to be cleansed again. Your Records Management Lead will advise how this recording process will be undertaken within your business area. This will assist you in making sure that data cleansing is undertaken on a regular basis within your business area.

**7 Frequency of data cleansing**

Data cleansing should be an ongoing process, and should become part of your day-to-day management of your working records. It is best practice to remove duplicated and short term value or minor importance records as soon as they are no longer required. This will assist in minimising the length of time spent on a full data cleansing exercise in the future.

It is recommended that a full data cleansing exercise is undertaken within your business area on a six monthly basis and no less than annually. This will help to ensure that you are only ever holding records in accordance with the NSS Document Storage, Retention and Disposal Policy.

**8 Further guidance**

Each SBU/Directorate has a Records Management Lead and a network of local champions, who will provide further advice and guidance. A list of SBU/Directorate Records Management Leads can be found on the geNSS Business Classification Scheme page and the Corporate Records Management page provides additional guidance.
Appendix A: Short Term Value or Minor Importance Documents

Documents that could be classed as short term value or of minor importance:

- Duplicate copies of meeting minutes
- Duplicate copies of reports
- Draft documents
- Meeting arrangements
  - Room bookings
  - Car parking requirements
  - Catering arrangements
- Reference notes
- Newsletters
- Check lists
- Workload plans
- Registers compiled for temporary purposes
- Distribution lists