

# Appraisal and Transfer to Archive Policy



Title:  Appraisal and Transfer to Archive Policy			
Date effective from:	August 2025	Review date:	August 2028
Approved by:	Policy Approval Group		
Approval Date:	29 July 2025		
Author/s:	Board Secretary, NHS Lothian Lothian Health Services Archive Manager, University of Edinburgh		
Policy Owner:	Board Secretary, NHS Lothian Head of Health Records, NHS Lothian		
Executive Lead:	NHS Lothian Senior Information Risk Owner (currently Director of Public Health and Health Policy)		
Target Audience:	All NHS Lothian staff		
Supersedes:	New policy		
Keywords (min. 5):	Appraisal; Archive; LHSA; Sensitivity Review		

# Appraisal and Transfer to Archive Policy



## Version Control

Date	Author	Version	Reason for change
Nov 2024	Lothian Health Services Archive Manager	v0.1	New policy under development
Feb 2025	Lothian Health Services Archive Manager	v0.2-3	Minor corrections/amendments and alignment with other policies
May 2025	Lothian Health Services Archive Manager	v0.4	Amended to take in comments from Information Governance
May 2025	Lothian Health Services Archive Manager	v0.5	Submitted to Information Governance Working Group for review. No further comments or changes.
June 2025	Lothian Health Services Archive Manager	v0.6	Formatting/version correction (Policy Hub)
July 2025	Lothian Health Services Archive Manager	v1.0	Approved by the Policy Approval Group

## Executive Summary

The aim of the Appraisal and Transfer to Archive Policy is to lay out NHS Lothian's approach to ensuring that records worthy of preservation, or having long-term, historical, research or corporate memory value, are retained and transferred to its permanent place of deposit at the Lothian Health Services Archive, hosted by the University of Edinburgh. The policy outlines the steps required to select, appraise and review records that need to be taken before transfer.

A general overview of our approach to records management is outlined in the NHS Lothian Records Management Policy.

## Contents

	Page
1.0 <u>Purpose</u>	4
2.0 <u>Policy statement</u>	4
3.0 <u>Scope</u>	5
4.0 <u>Definitions</u>	5
5.0 <u>Implementation roles and responsibilities</u>	6
6.0 <u>Associated materials</u>	7
7.0 <u>Evidence base</u>	7
8.0 <u>Stakeholder consultation</u>	7
9.0 <u>Monitoring and review</u>	8

## 1.0 Purpose

According to the Universal Declaration on Archives:

‘Archives record decisions, actions and memories. Archives are a unique and irreplaceable heritage passed from one generation to another. [...] They are authoritative sources of information underpinning accountable and transparent administrative actions.’<sup>1</sup>

Under the Public Records (Scotland) Act 2011 (PRSA), public authorities, including NHS Lothian, are required to identify records which should be permanently preserved.<sup>2</sup> The identification and selection of records is done through a process of consultation and appraisal, which involves record creators (NHS Lothian departments and staff), Information Asset Owners (IAOs), records management teams and archive specialists. The Lothian Health Services Archive (LHSA), based at the University of Edinburgh, is the designated place of deposit for NHS Lothian under compulsory Element 7 of NHS Lothian’s Records Management Plan in compliance with the PRSA.

Records can exist in any format, including paper, digital, audio, film etc. They may be stored in any medium, including social media channels, and they may have originated in Microsoft Teams channels, SharePoint sites or individual or shared email accounts. The fact that it may not be possible to allow public access to some records, especially those containing personal data, for many years does not prevent their selection for permanent preservation.

Digital records are vulnerable and may become inaccessible due to format obsolescence or deletion. NHS Lothian needs to capture any decisions about the potential value of its information early in the record lifecycle. This is vital to ensure essential context is maintained and to allow for efficient and effective appraisal of the information.

## 2.0 Policy Statement

Identifying and collecting records of archival value enables the organisation to:

- support openness and transparency and help to ensure NHS Lothian is accountable for its actions, past, present and future
- maintain a record of past actions for evidential purposes and provide a precedent for decisions in the present and future
- support research, meeting the needs of academic and scientific research communities, as well as the public (genealogists and local historians)
- preserve the long-term, corporate memory of the Board, as a public institution
- support education and training

<sup>1</sup> *Universal Declaration on Archives* | International Council on Archives (ica.org)

<sup>2</sup> Element 7 of the PRSA Records Management Plan states: “a small proportion of records created by a public authority will be earmarked for permanent retention. These records will normally be removed from operational systems and transferred to an archive. This applies to records in all formats, although the procedure for transfer will vary (for example electronic records allow for records to remain 'live' until the successful transfer of the archive copy has been confirmed).”

- enable commercial and non-commercial re-use of information
- support the conduct of public inquiries and the Board's compliance with its relevant statutory duties and ensure the retention of records that may be in the public interest.

The Records Disposal Policy provides a framework for identifying and making decisions about records that are no longer required for ongoing business or administration purposes. It is supported by the Transfer and Destruction Register, which provides a permanent record of disposal decisions, including those which result in records being appraised and transferred to LHSA, the Board's archive provider. Maintaining a permanent record of disposal decisions also supports compliance with other information governance obligations, such as responding to Subject Access or Freedom of Information requests.<sup>3</sup>

### Selection and appraisal

The selection, appraisal and transfer of records to archive follows a series of steps:



Generally, only a small proportion of records are suitable for permanent preservation. The selection criteria in Appendix 1 will help staff to identify records of long-term, historical or future research value, or where there is a legal obligation to retain.

The LHSA Archivist will review the selected records in the archives. If records are deemed unsuitable, they will be destroyed in accordance with the Scottish Government Records Management Code of Practice for Health and Social Care 2024 (Code of Practice)<sup>4</sup> after consultation with the Corporate Records Manager or Head of Health Records, and relevant Information Asset Owners. Alternatively, LHSA might also send the unwanted records back to the Board, especially if the contents are not what was expected.

## 3.0 Scope

This policy applies to:

- all employees
- volunteers
- all NHS Lothian sites and locations
- patient health records (selected as recommended under section 5.2 (paragraph 229) of the Code of Practice)
- all corporate and administrative records held in any format by NHS Lothian

<sup>3</sup> See 'Documenting the destruction of records', section 7.14, Scottish Ministers' Code of Practice on Records Management by Scottish Public Authorities under the Freedom Of Information (Scotland) Act 2002 (section 61), 2011. Available from: <https://www.gov.scot/binaries/content/documents/govscot/publications/advice-and-guidance/2011/12/code-of-practice-on-records-management/documents/section-61-code-practice-records-management-pdf/section-61-code-practice-records-management-pdf/govscot%3Adocument/Section%2B61%2Bcode%2Bof%2Bpractice%2Bon%2Brecords%2Bmanagement.pdf>

<sup>4</sup> Scottish Government Records Management Code of Practice for Health and Social Care, 2024. Available from: <https://www.digihealthcare.scot/app/uploads/2024/08/RM-CoP-for-HSC-2024-v04.0-MASTER-2024-08-09.pdf>

## 4.0 Definitions

### 4.1 Selection

The selection of records for permanent archival preservation is partly informed by precedent and partly by the historical context of the subject or topic. It is also based on the retention schedules contained within the Code of Practice. It is also possible to select for preservation a sample of certain types of record as exemplar, for example patient records relating to rare conditions or novel treatments. Local transfer procedures should be developed, using the profile of material that has already been selected, and the history of the organisation.

### 4.2 Appraisal

Reviewing records, also known as appraisal, refers to the process of determining whether records require to be retained beyond their designated retention date, destroyed as they have reached the end of their retention period, or are worthy of archival preservation. This process will also include a review of the sensitivity of records and determine the mode of disposal. Appraisal decisions are informed by a number of factors including the historical, legal, operational and financial value of the records.

### 4.3 Sensitivity Review

Sensitive, personal, commercial, or organisational information is unlikely to be available to the public for consultation for several decades to protect the privacy rights of individuals and the rights of the Board and its staff. Since Data Protection legislation applies to living individuals, access to personal data contained in the LHSA must be predicated on a lifespan assumption. This means that records relating to a person must remain closed for at least 100 years.<sup>5</sup>

Prior to the transfer of records to the LHSA staff will need to conduct a sensitivity review. This will identify any records which cannot be released for public use under Freedom of Information (FOISA), Environmental Information Regulations (EIR), Data Protection (DP), or for any other reason. Any sensitive or classified information must be formally approved and/or declassified by the relevant Information Asset Owner (IAO) prior to transfer to the LHSA. The sensitivity review will normally be undertaken by the IAO, Head of Health Records or the Corporate Records Manager and Data Protection team as required. Following the review, some records may ultimately be too sensitive to transfer and will be retained by NHS Lothian. These records may be re-appraised at a later date and subsequently transferred to LHSA.

The review will apply to both paper and digital records designated for transfer.

### 4.4 Preparation and Transfer

Best practice suggests that records selected for archival preservation should be transferred as early as practicable and no later than 30 years from creation of the record, with digital

---

<sup>5</sup> It is often safer to assume a longer lifespan given that life expectancy is increasing steadily.

records being transferred within a shorter period due to their inherent vulnerability to change or deletion.

It is important that any records identified for permanent preservation are transferred on a regular basis to the LHSA, in line with the retention schedules and the records management lifecycle.

Hard copy records should be checked for damage (mould or insect damage) and kept in the order in which they have been used. They should be suitably boxed and secured ready for collection or delivery. Ideally, digital records should be transferred in their original file structure and not removed to a temporary location. This allows contextual information to be captured from the related files.

## 4.5 Access arrangements

As part of the Board's responsibility under PRSA, records that are selected for permanent preservation should be made available for public use, where possible. NHS Lothian is committed to the principles of public access set out in the National Records of Scotland *Supplementary guidance on proper arrangements for archiving public records*<sup>6</sup>.

Arrangements for access to the archive collections held by LHSA are outlined in the Services Agreement. Following a sensitivity review, records may be transferred to LHSA but access restricted due to the nature of the personal data they contain. These records are catalogued and information about the restrictions that affect access are provided as part of the catalogue entry. Archived records held by LHSA are also subject to Freedom of Information (Scotland) Act 2002, the Environmental Information (Scotland) Regulations 2004 and UK Data Protection Act 2018. NHS Lothian remains owner and the Data Controller for records held by LHSA.

## 5.0 Implementation roles and responsibilities

Selection and appraisal of records is normally undertaken jointly by NHS Lothian's Corporate Records Manager, Head of Health Records, Information Asset Owners (IAOs) and the LHSA Archivist at the University of Edinburgh.

### 5.1 Information Asset Owners

Once records have reached the end of their active use, they can be considered for disposal and potential transfer to LHSA. The Code of Practice indicates the key record types that should be considered for permanent preservation, but Information Asset Owners may also identify other records of significance.

Information Asset Owners will also assist with the sensitivity review of records sent to the LHSA.

<sup>6</sup> National Records of Scotland *Supplementary guidance on proper arrangements for archiving public records*. Available from: <https://www.nrscotland.gov.uk/media/zwxfsiys/supplementary-guidance-on-proper-arrangements.pdf>

## 5.2 Corporate Records Manager and Head of Health Records

The Corporate Records Manager and Head of Health Records have a responsibility to provide guidance on the types of records that should be transferred to LHSa and can assist in conducting the initial appraisal and sensitivity review.

## 5.3 NHS Lothian staff

All staff should be aware of the requirement to preserve records of long-term value, research or historical interest. If, in the course of their duties, they come across records that might be considered of archival value, they should speak to their line manager or Information Asset Owner or the Corporate Records Manager/Head of Health Records for advice.

Records that could be of historic interest, in any format, should not be deleted or destroyed until they have been considered in line with the Records Disposal Policy and any associated procedures and guidance.

## 5.4 LHSa Archivist at the University of Edinburgh

The LHSa Archivist, working with the Corporate Records Manager and Head of Health Records (as required), will assess records scheduled for transfer and confirm whether they will be accepted.

## 6.0 Associated materials

In conjunction with the Public Records (Scotland) Act 2011 and Data Protection and Freedom of Information legislation, NHS Lothian will apply the records management best practice principles outlined in the Scottish Government Records Management Code of Practice for Health and Social Care (August 2024). It will also follow the principles of Caldicott, IT Security, Information Sharing, and Confidentiality, as defined in the Board's supporting policies, procedures, guidelines and protocols to meet required records management standards. Relevant Board policies, procedures guidelines and protocols are represented via (some links require access to staff intranet site):

[Records of enduring value for corporate memory, historical and research purposes](#)

[Access to Applications and Network Policy](#), approved by the Policy Approval Group, available on the NHS Lothian intranet)

[CCTV Policy](#), approved by the Policy Approval Group, March 2025

[Confidentiality Policy](#), approved by the Policy Approval Group, April 2018

[Data Protection Policy](#), approved by the Policy Approval Group, June 2022

[RHCYP and DCN Internet Access and Loan Devices Policy](#), approved by the Policy Approval Group, February 2018

[Subject Access Policy](#), approved by the Policy Approval Group, June 2022

[Access to Applications and Network Policy](#), approved by the Policy Approval Group, July 2023 (available on the NHS Lothian intranet)



[Data Access for Research Policy and Guidance](#), approved by the Policy Approval Group, June 2022 (available on the NHS Lothian intranet)

[Data Access Policy](#), approved by the Policy Approval Group, June 2022 (available on the NHS Lothian intranet)

[Digital IT Security Policy](#), approved by the Policy Approval Group, June 2022 (available on the NHS Lothian intranet)

[Information Risk Management Policy](#), approved by the Policy Approval Group, June 2022 (available on the NHS Lothian intranet)

[Information Security Management System Policy](#), approved by the Policy Approval Group, June 2022 (available on the NHS Lothian intranet)

[Warning and Alerts Policy](#), approved by the Policy Approval Group, June 2022 (available on the NHS Lothian intranet)

[Records Management Policy](#)

Records Disposal Policy [hyperlink to be added]

[Human Resources Policies](#) (including [Guidance on the Maintenance of Personal Files](#)) (available on the NHS Lothian intranet)

## 7.0 Evidence base

- [Public Records \(Scotland\) Act 2011](#)
- [Scottish Government Records Management Code of Practice for Health and Social Care 2024](#)
- [Freedom of Information \(Scotland\) Act 2002](#)
- [Environmental Information \(Scotland\) Regulations 2004](#)
- [UK Data Protection Act 2018](#)
- [The Inquiries Act 2005](#) and [The Inquiries \(Scotland\) Rules 2007](#)

## 8.0 Stakeholder consultation

NHS Lothian consultation groups for this policy will be the Information Governance Working Group (IGWG) and the Digital Portfolio Group (DPG). A draft version of this policy was placed on the NHS Lothian Consultation Zone to give all NHS Lothian staff the opportunity to provide comment/feedback.

## 9.0 Monitoring and review

The Executive Director of Public Health & Health Policy is the nominated Senior Information Risk Owner (SIRO) and the named senior manager with corporate responsibility for Records Management. As such, they are responsible for the management of NHS Lothian's public records and have executive ownership of this policy. They also have overall responsibility for the NHS Lothian Records Management Plan.

Operational responsibility for the implementation of the Records Management Plan is held jointly, between the Corporate Records Manager (for corporate records) and the Head of Health Records (for patient records). As such, they share operational ownership of this policy.

Progress in delivery against the Records Management Plan will be reviewed on an ongoing basis. Outputs from this regular progress review will inform the Progress Update Reviews (PURs) which will be prepared and submitted to the Keeper of the National Records of Scotland, from time to time.

Responsibility for reviewing and updating this policy sits jointly with the Corporate Records Manager and the Head of Health Records.

This policy, and its associated materials, will be reviewed every three years, as a minimum, or as a result of any changes in legislation, guidance, as the result of inspection or audit, or any other factors which may render the policy in need of earlier review.