Delegating record keeping and countersigning records

Guidance for nursing staff

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Introduction

As a member of the wider health care team, the health care assistant (HCA), assistant practitioner (AP) or nursing student takes personal accountability for good record keeping. They must keep clear, accurate and timely records of the care they provide to their patients to support communication, continuity and decision making. This includes all forms of patient records, ie anything that is documented about a patient and their care and treatment.

The Nursing and Midwifery Council (NMC) Code includes principles for effective delegation (paragraphs 29-31) and there is further information on this topic on the NMC website. This RCN guidance draws on these documents to clarify the issues of delegating record keeping and countersigning records for nursing staff and employing organisations.

Countersigning

Local policies may require registered nurses to countersign clinical records made by an HCA/AP/nursing student. This is not an automatic requirement.

The key issues are:

- whether the HCA/AP/student has been trained to appropriate standards and is competent to produce such records as part of the overall provision of care
- whether it is in the patient’s best interests for recording of care (as well as care provision) to be delegated. For further information about delegation, see the NMC’s Guidance on delegation.

If a registered nurse is satisfied the above criteria are met, then delegation of the record keeping activity will be appropriate and there will be no requirement for the registered nurse to countersign the notes.

Conversely, if there is any doubt about the individual’s competence, then supervision and countersignatures will be required until they have received the appropriate level of training and are deemed competent to complete the activity. In any event, a registered nurse should not be countersigning notes unless they have witnessed or can validate the activity as having taken place.

The act of record keeping attracts the same principles as any other delegated task in the health care setting, including the need for ongoing supervision as appropriate.

The registered nurse retains professional accountability for the appropriateness of the delegation of the task, but the HCA/AP/student takes on personal accountability for the content and quality of the records, in line with NMC guidance and organisational policy. See Resources listed below for more information.

If, however, a countersignature is required, the following advice should apply.

The countersignature

A countersignature should enable identification of the registered nurse who has countersigned, ie not just initials. The NMC recommends that the person's name and job title should be printed alongside the first entry in a record.

Principles

1. Record keeping can be delegated to HCAs, APs and nursing students so that they can document the care they provide.
2. Record keeping is an integral part of every intervention and the HCA/AP or student should be assessed as competent in the complete provision of care, which includes record keeping. Until they are deemed wholly competent in both the activity and its documentation, countersigning as in principles four and five should be performed.
3. As with any delegated activity, the registered nurse needs to ensure that it is in the patient’s best interests for the activity and documentation to be delegated to the HCA/AP or student.
4. Supervision and a countersignature are required until the HCA/AP or student is deemed competent at the activity and keeping records. The principles of accountability and delegation apply (see www.rcn.org.uk/hcaaccountability)
5. Registered nurses should only countersign if they have witnessed the activity or can validate that it took place.
6. Organisations providing health care should supply clear guidance on record keeping for all staff, in line with the principles and guidance in the NMC’s Record keeping guidance.
Countersigning entries in electronic records

The NMC’s Record keeping guidance states that smartcards or passwords to access information systems must not be shared. Therefore, the registered nurse must log on separately to complete the authentication of the record entry. If a student or other staff member does not have access rights to electronic records, the registered nurse will have to complete the record stating who made the observation, completed the assessment, gave the care or was also present. For example, ‘wound dressing renewed by nursing student .... of ......University’.

Functionality can be included in electronic records to support countersigning although systems vary in the way that countersigning is achieved. Other systems allow the HCA/AP/student to record information and a message is sent to the supervisor to request a countersignature.

Resources

Nursing and Midwifery Council

www.nmc-uk.org


Royal College of Nursing

www.rcn.org.uk

Royal College of Nursing (2012) Health care assistants (HCAs) and assistant practitioners (APs) health records and record keeping – Available from https://www.rcn.org.uk/support/rcn_direct_online_advice (RCN member resource)


Other resources/guidance
