



Putting People 1st

Records Management Policy

G.21

Reviewed

23 February 2023

Date next due for review:

February 2026

This policy document can be produced in various formats, for instance, in larger print or audio-format; and it can also be translated into other languages, as appropriate.

Our equality and diversity policy statement describes our key equality commitments that we use to develop all organisational services; this includes employment services and services to tenants and other customers.

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The Scottish Housing Regulator Reg. No: HAC231; Registered Scottish Charity No: SC038237; FCA Reg. No: 2375R(S); Property Factor Reg. No: PF000151



HAPPY TO TRANSLATE

1 Introduction

- 1.1 The Association creates, handles and uses records of information to support its functions and operations as a registered social landlord in Scotland. These records contain information that is an invaluable resource and a significant operational asset to support such functions and operations. The Association will adopt a systematic approach to records management. This is necessary to protect and preserve records to support the Association's functions and operations and provide evidence of events, activities and transactions.
- 1.2 Detailed guidance on the appropriate records management approach is detailed in the Association's Records Management Procedure.
- 1.3 Managing records appropriately reduces the costs and risks associated with retaining unnecessary information and is core to complying with legal and regulatory requirements, including:
 - 1.3.1 General Data Protection Regulation;
 - 1.3.2 Data Protection Act 2018;
 - 1.3.3 Freedom of Information (Scotland) Act 2002;
 - 1.3.4 Environmental Information (Scotland) Regulations 2004; and
 - 1.3.5 Human Rights Act 1998.
- 1.4 The Association will also comply with the Scottish Ministers' Code of Practice on Records Management issued under Section 61 of the Freedom of Information (Scotland) Act 2002. The Code recommends that the Association have a records management policy and organisational arrangements in place that support records management.
- 1.5 This policy is an organisational commitment to effective records management at the Association.

2 Responsibility and scope

- 2.1 The Association's Data Protection Officer (DPO) is responsible for this policy, assisting staff in maintaining appropriate information audits for their departments, providing guidance on records retention and delivering staff training on records management.

- 2.2 Records are documents (including written and typed documents and annotated copies), computer files, paper files, communications (including voicemails and SMS messages) and other material in all recorded formats, including electronic, paper, film, video (including CCTV footage), audio and others available through existing and emerging technologies.

3 Records management

- 3.1 Records management can be described as the efficient and systematic control of the planning, creation, receipt, maintenance, use, distribution, storage and disposal / permanent preservation of records throughout their lifecycle. It ensures that evidence of, and information about, the Association's activities and transactions is captured in its record keeping systems and maintained as viable records. It concerns placing controls around each stage of a record's lifecycle, at the point of creation or receipt, during its maintenance and use and at ultimate disposal. Through such controls, the Association can ensure its records demonstrate the key features of authenticity, reliability, integrity and accessibility.

- 3.2 The main benefits of good records management at the Association are:

3.2.1 promotes the creation and storage of accurate and reliable records in a managed environment, which provide an audit trail of actions that can support the Association in the event of, for example, regulatory intervention;

3.2.2 increases organisational and administrative effectiveness, efficiency and service delivery through improved access to and retrieval of high quality records;

3.2.3 helps enhance information security by facilitating improved confidentiality, integrity and availability of records;

3.2.4 improves working environments and more economical use of physical and server space through reducing the retention of irrelevant, duplicate and out-of-date records;

3.2.5 promotes the Association's physical and intellectual control of all records by knowing what records it has and how and where to retrieve them easily;

3.2.6 ensures that the Association identifies and retains records of historical and evidential value to the Association as a "corporate memory" and to assist in managing future recurrences of specific events;

3.2.7 helps to maintain audit trails relating to access and alteration of records;

- 3.2.8 improves information sharing and the provision of easy and timely access to the correct information at the right time, resulting in better quality decision making and thereby facilitating transparency and accountability for all actions;
- 3.2.9 manages business continuity risks by helping to identify records that are essential to continued operation which, if lost or destroyed, would seriously impair or disrupt the Association's operations; and
- 3.2.10 assists in compliance with all legal and regulatory obligations, including responding to requests for information and personal data made to the Association.

3.3 The risks to the Association in not maintaining effective records management are:

- 3.3.1 poor quality decisions being made on the basis of inaccurate, incomplete or out-of-date records;
- 3.3.2 levels of service to service users being inconsistent due to records of previous actions being unavailable;
- 3.3.3 financial, legal or reputational loss if the necessary evidence of an activity or transaction is not available or cannot be relied upon in the event of, for example, regulatory intervention;
- 3.3.4 non-compliance with legal or regulatory requirements applicable to the Association;
- 3.3.5 failure to identify, protect and retain records that are critical to business continuity;
- 3.3.6 additional costs incurred in storing records for longer than necessary; and
- 3.3.7 wasted time and resources in searching for records in response to a request received.

4 Storage of and access to records

- 4.1 Records must be stored securely at the Association's premises or at a secure location in accordance with the Association's Data Protection Policy and Information Security Procedure to minimise the risk of damage, loss or unauthorised access to the records.
- 4.2 Staff should only access records on a strict "need to know" basis, depending on the nature of a record and its relevance to the work of staff.

5 Retention and destruction of records

The Association's Data Retention Policy sets out how long records will normally be held and when they will be destroyed. The Association will regularly review and update the Data Retention Policy with additional record types that it uses in the course of carrying out its functions and operations.

6 Failure to comply

- 6.1 The Association takes compliance with this policy very seriously. Failure to comply puts both staff and the Association at risk.
- 6.2 Due to the importance of this policy, failure to comply with any requirement of it may lead to disciplinary action for a member of staff, and this action may result in dismissal for gross misconduct.
- 6.3 Any questions or concerns about this policy should be directed to the DPO.

7 Review and updates to this policy

The Association will review and update this policy in accordance with its legal obligations and may amend, update or supplement it from time to time and at least every 3 years or earlier, if required by changes in legislation or technology underlying its document management systems.