



The Langstane Group

Records Management Policy

Approved by Leadership Team	14 February 2024
Performance Committee	5 March 2024
Approval date	5 March 2024
Implementation date	5 March 2024
Review date	March 2027
Version	3

Policy Version	Date approved	Changes
Version 1	20 November 2019	New Policy
Version 2	28 April 2021	Minor updates to content to include up-to-date information on GDPR regulations.
Version 3	Performance Committee Approval sought Tuesday 5 March 2024	Removal of references to INVU Update to applications Added responsibilities information Added "failure to comply" section General formatting update

1. Introduction

Langstane Housing Association is a Co-operative and Community Benefit Society and a registered social landlord with charitable status.

The Langstane Group (the Group) consists of Langstane Housing Association Limited and its wholly owned subsidiaries.

The Freedom of Information (Scotland) Act 2002 (Designation of Persons as Scottish Public Authorities) Order 2019 provides that Housing Associations in Scotland be considered as public bodies under the Act and accordingly subject to the requirements of the Freedom of Information Act 2000 (FOIA) and the Environmental Information Regulations 2004 (EIR) which give rights of public access to information held by public authorities.

This applies to housing services where a Scottish Secure Tenancy or Short Scottish Secure Tenancy has been granted. Information in relation to mid market rents are out with the scope of the Act. The principles of good records apply across the Group.

As detailed in the Information Security Policy the Group has a legitimate need to collect, store and use certain types of information about its employees, residents, customers and others associated with the Group to carry out its functions.

The management and use of such information, whether in manual or electronic format, will be to the highest standards possible whilst remaining proportionate to the risks present and meeting the requirements of the General Data Protection Regulation (GDPR) and Data Protection Act 2018.

Guidance for public authorities on records management, that is keeping, managing and destroying records, is provided for in a Code of Practice (Section 46 of the FOIA) and has been considered in the formulation of this policy.

2. Policy statement / aim of the policy

The aim of the policy is to ensure that employees adhere to the requirements for the creation, maintenance, use, retention, storage, retrieval and disposal of records which complies with legislation and preserves and protects information where required.

3. Objectives

The objectives of the policy are to:

- Specify the requirements for establishing, implementing, operating, monitoring, reviewing and maintaining a record management system;
- Ensure that business is conducted in an efficient and accountable way;
- Ensure services are delivered consistently and equitably;
- Ensure documents can be readily retrieved / accessed;
- Meet legislative and regulatory requirements; and
- Provide business continuity in the event of a disaster.

4. Responsibilities

The Association's Data Protection Officer (DPO) has responsibility for this policy. The DPO provides advice to employees on records retention, delivering employees training on records management and ensure information audits are carried out.

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.

5. Links to other policies

The Group's Record Management Policy is linked to a number of corporate documents and policies in particular, but not solely:

- Retention Schedule;
- Business Continuity Plan;
- Privacy Policy;
- Business Plan;
- Information Security Policy;
- Code of Conduct;
- Social Media Policy;
- Risk Management Policy; and
- Freedom of Information and Environmental Information Policy.

6. Policy

The Group has a duty to ensure that records are well managed. Anyone who receives, creates, maintains or has access to the Group's records has a responsibility to ensure that they act in accordance with this policy and associated guidance and procedures.

6.1. Definition

A record is recorded information, regardless of form or medium created, received and maintained by an organisation in pursuance of its legal obligations or in the transaction of its business.

6.2. Document Creation

Documents which are created will meet the requirements of the Group's corporate style as set out in the Corporate Style Guidance Note.

6.3. Capture / Data Storage of Information

All data held by the Association must be stored securely, whether in paper or electronic format. The Association has an Information Security Policy to ensure there are robust measures in place to protect personal data that is held electronically.

The Association primarily uses the following applications:

- HomeMaster (web based Housing and Financial platform)
- Microsoft Office 365 and Microsoft Teams
- Job Management Software (One Serve)
- Standalone Financial and HR Software/Applications
- AdminControl Software for Board of Management/Leadership Team

Filing protocols specified are in place which dictates where the individual items are stored.

- 6.4. Certain employees members, depending on their job role, have different access levels to the above list of applications. Use and Security of Information

It is the responsibility of all employees to follow document management and filing protocols to adhere to this policy.

- 6.5. Retention and Disposal

The Group has a data retention schedule in place.

All hard copy personal information is disposed of via confidential waste bins provided at each office location.

7. Failure to comply

The Association takes compliance with this policy very seriously. Failure to comply puts both employees and the Association at risk.

Any questions or concerns about this policy should be directed to the DPO

8. Monitoring and Review

This policy will be reviewed every three years in line with the Privacy Policy. Unscheduled reviews will take place in the event of significant change.

Right to complain

In the event you are not satisfied with the service you have received, please contact the Association for a copy of the Complaints Policy. This can also be viewed on Langstane Housing Association's website – www.langstane-ha.co.uk.

Equality and diversity

The Langstane Group / Langstane Housing Association is committed to promoting equality and diversity across all areas of work. Discrimination or harassment of any kind is not tolerated.

If you would like this document sent to you in large print, please contact Customer Services on 01224 423000.