



## **The Langstane Group**

### **Records Management Policy**

<b>Approved by Senior Management Team</b>	9 February 2021
<b>Board of Management</b>	Board of Management
<b>Approval date</b>	28 April 2021
<b>Implementation date</b>	05 May 2021
<b>Review date</b>	1 April 2024
<b>Version</b>	2

<b>Policy Version</b>	<b>Date approved</b>	<b>Changes</b>
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.

## 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 staff, residents, customers and others associated with the Group in order to carry out its functions.

Therefore 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 staff 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
- Provide business continuity in the event of a disaster

#### 4. 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
- Freedom of Information and Environmental Information Policy

#### 5. 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.

##### 5.1. 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.

##### 5.2. 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.

##### 5.3. 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 uses the following applications:

- INVU Document Management
- Microsoft directories
  - Outlook Public Folders
  - Shared Public Drive

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

Certain staff members, depending on their job role, have different access levels to the above list of applications.

#### 5.4. Use and Security of Information

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

#### 5.5. Retention and Disposal

The Group has a data retention schedule in place. For the Invu software automatic deletions take place in accordance with the schedule.

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

### 6. 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](http://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 Support Services on 01224 423000.