



# Records Management Policy

V.1 – October 2019

<b>Policy Number</b>	<b>C.21</b>			
<b>Document Owner</b>	<b>Corporate</b>			
<b>Review Frequency</b>	<b>3 Yearly</b>			
<b>Reviewed by</b>	<b>Information Law Solutions</b>			
<b>Date Approved</b>	<b>2<sup>nd</sup> October 2019</b>			
<b>Next Review Due</b>	<b>October 2022</b>			
<b>Version Number</b>	<b>1</b>			
<b>Consultation Required</b>	<b>Yes</b>		<b>No</b>	<b>x</b>
<b>Equalities Impact Assessment</b>	<b>Yes</b>		<b>No</b>	<b>x</b>
<b>Added to Website</b>	<b>Yes</b>	<b>x</b>	<b>No</b>	

<b>SSHC Reference</b>	
<b>SHR Reference</b>	

## Related Documents

- **Records Management Procedure**
- **Records Retention Policy**

C.21

## **Translation Statement**

If you have any difficulties reading this information or need further help understanding our processes please contact us. We can make this document available in a variety of formats. All you need to do is let us know what you need and we will try to assist.

## **Compliance**

This policy has been drafted to ensure that it complies with current legislation and industry good practice.

## **Equality & Diversity**

Fyne Homes is committed to providing services which embrace diversity and which promote equality of opportunity. As an employer we are also committed to equality and diversity within our workforce. Our goal is to ensure that these commitments, reinforced by our Values, are embedded in our day-to-day working practices.

## **Openness & Confidentiality**

Fyne Homes believes that its members, tenants and other interested parties should have access to information on how it conducts itself. This means that unless information requested is considered commercially sensitive or personally confidential it will be made available on request.

## **General Data Protection Regulations**

Fyne Homes recognises that the General Data Protection Regulations are an important piece of legislation to protect the rights of individuals in respect to any personal information that we may keep about them, whether on computer or in manual systems. We will treat your personal data in line with our obligations under the current data protection regulations and our own Data Protection Policy. Information regarding how your data will be used and the basis for processing your data is provided in our Transparency Statements

## **1. Policy Statement**

- 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.

## **2. Legal framework**

- 2.1 Managing records appropriately reduces the costs and risks associated with retaining unnecessary information and is core to complying with legal and regulatory requirements, including:
  - 2.1.1 General Data Protection Regulation;
  - 2.1.2 Data Protection Act 2018;
  - 2.1.3 Freedom of Information (Scotland) Act 2002;
  - 2.1.4 Environmental Information (Scotland) Regulations 2004; and
  - 2.1.5 Human Rights Act 1998.

## **3. Managing and Reporting**

- 3.1 Detailed guidance on the appropriate records management approach is detailed in the Association's Records Management Procedure.
- 3.2 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.
- 3.3 This policy is an organisational commitment to effective records management at the Association.
- 3.4 The Association takes compliance with this policy very seriously. Failure to comply puts both staff and the Association at risk.
- 3.5 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.
- 3.6 Any questions or concerns about this policy should be directed to the Data Protection Officer (DPO).

## **4. Review and updates to this policy**

- 4.1 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.

- 4.2 If there is a procedural delay in the policy revision then the relative legislation in force at the time will prevail.

<b>Version number</b>	<b>Revision Date</b>	<b>Part of doc revised</b>	<b>Reason for revision</b>	<b>Approved by</b>
1	Oct 2019		New Policy to comply with FOI requirements	Mgt Comm