



Information and Records Management Policy

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Section 1 - Information and Records Management Policy

1.1 Policy Statement

Govanhill Housing Association recognises the value of our records as a corporate asset, and the management of records as a key corporate function. Our records are our corporate memory providing evidence of actions and decisions and supporting our daily functions and operations.

This policy and its related procedures and guidance are written with the intention of ensuring that adequate records are held by us, can be accessed quickly and easily and are managed and controlled effectively, efficiently and economically and in line with our legal, operational and information needs and requirements.

1.2 Scope of Policy

Every member of staff employed by the Govanhill Housing Association group must comply with this Information and Records Management Policy and all related procedures and guidance.

A record is defined as “*information created, received, and maintained as evidence and information by an organisation or person, in pursuance of legal obligations or in the transaction of business*”¹.

This policy covers all records held by Govanhill Housing Association regardless of format.

This policy therefore covers records in the following formats:

- Audio and video tapes, cassettes
- Email (including information held in personal email accounts)
- Facsimile (Fax)
- Photographs
- Records in all electronic formats, including discs, portable devices and CDs
- Records in paper format.

This policy also covers all records in the above formats that have been transferred to Govanhill Housing Association by external organisations, for the duration of time that they remain in the care of Govanhill Housing Association.

The policy and its related procedures and guidance stipulate:

- The requirements that must be met for the records themselves to be considered as proper records of activity.
- The systems and processes required to ensure the capture, integrity, security, retrievability and correct disposal of Govanhill Housing Association records.
- Staff responsibilities.

¹ International Standards Organisation ISO 15489 Information and documentation: Records Management, Part 1 2001

- Provision for regular review of the policy and its implementation.

1.3 Policy Objectives

The Public Records Scotland Act 2011 places an obligation on public authorities in Scotland, now including Govanhill Housing Association, to produce a records management plan which sets out their arrangements for the effective management of all records.

This policy and its associated guidelines are intended to ensure that all records held by Govanhill Housing Association are effectively managed throughout their life cycle, from planning and creation through to ultimate disposal. The eight main objectives of this policy are:-

Accountability - that adequate records are maintained to account fully, transparently and accurately for all actions and decisions, and in particular:

- To facilitate audit or examination
- To provide credible and authoritative evidence
- To protect legal and other rights of staff, or other people affected by those actions
- To allow public access to information about:
 - the services provided by Govanhill Housing Association
 - the costs of those services
 - the standard attained by those services
 - the facts which form the basis of decisions taken by Govanhill Housing Association which are of importance to the public
 - the publication of reasons for decisions made by Govanhill Housing Association.

Review and disposal – that there are consistent and documented retention, selection and disposal procedures for the various categories of records held by Govanhill Housing Association

Compliance – that records comply with any record keeping requirements resulting from legislation including our duties as a data controller as defined by the DPA, audit rules and other relevant regulations.

Performance measurement – that the application of records management procedures are regularly monitored and reviewed, and action taken to improve standards as necessary

Retrievability – that records and the information within them can be efficiently retrieved by those with a right of access, for as long as the records are held by Govanhill Housing Association

Quality – that records are complete and accurate and the metadata they contain is reliable and its authenticity can be guaranteed

Security – that records are secure from unauthorised or inadvertent alteration, destruction or deletion, that access and disclosure will be properly controlled and

audit trails will track all use and changes. Records and the systems in which they are held will be held in a robust format ensuring records remain retrievable and readable for as long as records are required.

Training – that all staff are made aware of their record-keeping responsibilities through generic and specific training programmes and guidance.

1.4 Related Procedures and Guidance

This Information and Records Management Policy is supported by related procedures and guidance documents:

- File Retention Schedule
- Privacy Policy
- Freedom of Information Policy and Procedures
- Subject access request procedures
- GDPR guidance

Section 2 - Review, Retention and Disposal

- 2.1 Govanhill Housing Association's Retention Schedule and related procedures set out the arrangement for managing review and the final disposal decisions for our records when they cease to be active and come to the end of their useful life.
- 2.2 This will:
 - 2.2.1 ensure that the correct records are held by Govanhill Housing Association for the:
 - conduct of business
 - maintenance of corporate memory
 - development of a knowledge base of skills and experience.
 - 2.2.2 support the Records Management policy by providing appropriate guidance for disposal decisions and actions.
 - 2.2.3 assist in identifying records that may be worth preserving permanently as part of our archives.
 - 2.2.4 prevent the premature destruction of records that need to be retained for a specified period to satisfy legal, financial and other requirements of public administration.
 - 2.2.5 provide consistency for the destruction of those records not required permanently after specified periods.
 - 2.2.6 avoid the costs and potential liabilities of retaining information we do not need and may lead to non-compliance with the Freedom of Information Scotland Act, the Environmental Information Regulations and the Data Protection Act and possible legal action against the organisation.
 - 2.2.7 ensure accurate indexing of records.
- 2.3 The Senior Management team will manage their section to ensure that any associated records retention schedules remain current, and are amended as appropriate to reflect any changes to the information held e.g. following the commencement of a new activity.

Section 3 - Roles and Responsibilities

- 3.1 The Director has overall responsibility for ensuring that records are managed responsibly within Govanhill Housing Association. Each member of the Senior Management team has delegated responsibility for the records managed by their department.
- 3.2 The key responsibilities are to:
- ensure that Govanhill Housing Association complies with the Section 61 Code and associated legislation
 - review and update this policy and associated guidelines to ensure they continue to support the records management requirements of Govanhill Housing Association in the undertaking of its operational and statutory functions
 - receive and approve change requests to our information management system procedures and information structure
 - update these systems and issue update alerts to all staff
 - arrange for the annual review and disposal of files
 - manage the audit programme and ensure any corrective actions are carried out
 - provide appropriate training, guidance and feedback mechanisms to support staff in carrying out their records management responsibilities.
- 3.3 It is the responsibility of all staff to ensure that they keep appropriate records of their work and manage those records in keeping with this policy and associated procedures and guidance.

3.4 Training and Support

- 3.4.1 Staff training and support is recognised as a pre-requisite to the successful implementation of its Information and Records Management policy. To this end appropriate training and guidance is provided to all staff:
- Information and Records management is included in the induction training programme
 - The Director and senior managers will provide ongoing guidance to all staff on, and support with, record-keeping standards and procedures.

Section 4 - Performance Review and Compliance Monitoring

- 4.1 This Information and Records Management Policy is supported by a performance monitoring and compliance audit programme. The programme will:
- Monitor compliance with the policy and associated procedures
 - Put in place corrective actions and improvement processes to resolve any issues and areas of non-compliance identified during the monitoring and audit process.
- 4.2 The electronic document and records management systems used by Govanhill Housing Association log all records activity. This provides an audit trail which can be used as evidential support for system monitoring and compliance auditing.
- 4.3 We will undertake periodic information and records management system self-improvement audits and outcomes and actions

Section 5 - Relevant Legislation and Regulations

- 5.1 The policy supports compliance with the following legislation and statutory guidance:-
- Freedom of Information (Scotland) Act, 2002 and the Scottish Ministers' Code of Practice on Records Management published under S.61 of the Act
 - Environmental Information (Scotland) Regulations 2004
 - General Data Protection Regulations 2018
 - Data Protection Act 2018
 - Equality Act 2010
 - Human Rights Act 1998
 - Management of Health and Safety at Work Regulations 1999
 - Health and Safety at Work etc. Act 1974
 - Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995
 - Other legislation relating to the particular subject area of certain records.

Section 6 - Information Security

6.1 Policy Statement

- 6.1.1 Information is a valuable asset. Business continuity is dependent on its integrity and continued availability. Therefore, steps will be taken to protect information assets from unauthorised use, modification, disclosure or destruction, whether accidental or intentional.
- 6.1.2 We are committed to the secure use of information and information technology systems in order to protect the availability, integrity and confidentiality of the information under our control. We undertake to have in place procedures to protect the information under our control.
- 6.1.3 We will use a risk-based approach when assessing and understanding the risks and will use physical, personnel, technical and procedural means to achieve appropriate security measures, including conducting 'penetration testing' annually. We will take into account developments in technology and the costs of implementation in order to achieve a level of security appropriate to the nature of the information and the harm which may result from a security breach.
- 6.1.4 Staff, contractors and others with whom we share information are subject to a duty to keep confidential information that is provided to Govanhill Housing Association to carry out our functions under FOISA and the EIRs, and may only disclose it with lawful authority. We will provide guidance and training to staff to enable them to understand and carry out their responsibilities in respect of security. We will assess their integrity and identity before they are employed. We will monitor their compliance with their obligations with respect to security.
- 6.1.5 Under section 65 of FOISA, it is a criminal offence for a Scottish public authority (or for any person employed by, who is an officer of, or is subject to the direction of, the authority) to alter, deface, block, erase, destroy or conceal a record held by the authority if a request has been made for information contained in the record and the applicant is entitled to be given the information.

6.2 Information Access

- 6.2.1 All documents and records will be available to all staff unless there is reason to restrict access for the purposes of business, personal security and/or justifiable confidentiality.
- 6.2.2 Compliance with these procedures also extends to contractors working on our behalf and as such this requirement should be included within the terms and conditions of contracts drawn up between Govanhill Housing Association and the contracting organisation.
- 6.2.3 We have in place a comprehensive business continuity plan which is designed to protect and provide early access to our records in the event of disaster or serious disruption to normal business.

6.3 Information Security

- 6.3.1 Staff must take all reasonable steps to ensure that they do not unnecessarily compromise the security of Govanhill Housing Association's ICT systems.

- 6.3.2 Staff must follow the procedures and controls within the Policy on the Use of the Internet and Email and associated guidance to manage their systems and the information contained on their system.
- 6.3.3 Our laptops, tablets and mobile phones are encrypted. When staff are provided with such equipment they are responsible for it and its contents.
- 6.3.4 You must take all reasonable steps to ensure that no viruses are transmitted by you to any third parties and to ensure that you do not knowingly allow a virus to affect our computer systems.
- 6.3.5 Staff must only use a memory stick provided by IT.
- 6.3.6 Staff are not permitted to download any software, audio files, games, etc. from the internet or to install or use any unauthorised software or hardware from home to use on the Govanhill Housing Association network unless it has been approved by IT.
- 6.3.7 Staff will be provided with an IT account allowing access to the Govanhill Housing Association network. The account is secured by a password which must be changed every 30 days and must comply with the required password conventions

6.4 Paper Mail Management

- 6.4.1 Staff must follow the procedure for the secure logging, tracking and disposal of incoming and outgoing mail
- 6.4.2 Staff must not remove files or other information from the building without the express permission of a member of the Senior Management team.

