



RECORDS MANAGEMENT POLICY

1.0 INTRODUCTION

1.1 Almond Housing Association Limited (AHA Ltd.) recognises the importance of efficient and effective records management to support its functions. AHA Ltd. defines 'records management' as:

"the efficient and systematic control of the creation, version identification, maintenance, use, distribution, filing, retention, storage and disposal of records in a way that is administratively sound and legally compliant, meets the needs of the Association, and preserves an adequate historical record."

1.2 Records contain information that is a valuable resource and important operational asset. AHA Ltd. therefore needs a systematic approach to the management of records to protect and preserve this information as evidence of actions.

1.3 Records management is necessary to:

- ensure that AHA Ltd. conducts its business in an orderly, efficient and accountable manner;
- deliver services to tenants, other service users, employees and other stakeholders in a consistent and equitable manner;
- support and record policy formulation and managerial decision making;
- facilitate the effective performance of activities throughout AHA Ltd.;
- provide continuity in the event of a disaster;
- meet legislative and regulatory requirements;
- provide protection and support in the event of litigation, including the management of risks associated with the existence or lack of evidence of organisational activity;
- protect AHA Ltd.'s interests and the rights of tenants, other service users, employees, present and future stakeholders;
- establish a business and cultural identity and maintain a corporate memory.

1.4 This policy describes:

- the roles and responsibilities of those involved in records management, and
- the AHA Ltd. framework through which effective records management may be

achieved.

1.5 This policy is supported by the following procedures:

- Records Management & Document Retention
- Document Management (Offsite Storage)

2.0 POLICY AIMS & SCOPE

2.1 This policy aims to ensure that:

- a) ***the record is present***, i.e. AHA Ltd. has the information needed to create a reconstruction of activities or transactions that have taken place;
- b) ***the record can be accessed***, i.e. information can be located, accessed and displayed in a way consistent with its initial use and, where several versions exist, the current version is clearly identified;
- c) ***the record can be interpreted***, i.e. it can be established who created the record as well as when and how, together with its context and how the record relates to other records;
- d) ***the record can be trusted***, i.e. the record reliably represents the information that was actually used in creating or updating it, and its authenticity and integrity can be demonstrated;
- e) ***the record can be maintained through time***, i.e. the record's qualities of accessibility, interpretation and trustworthiness can be maintained for as long as the record is needed, including permanently if required, despite changes of formats or the updating/replacing of systems.

2.2 This policy applies to all records created, received and maintained by employees in the course of their employment by AHA Ltd.

For the purposes of this policy a 'record' is a document which facilitates and supports the work of AHA Ltd. and which is retained for a defined period to provide evidence of our activities or transactions. A record may be in printed or digital format.

Legislation & AHA Ltd. policies

2.3 AHA Ltd.'s records management systems and procedures aim to facilitate compliance with current data legislation and subsequent guidance issued by the Information Commissioner's Office, in particular regarding the holding and processing of 'data' as defined by the Data Protection Act 2018 and the EU General Data Protection Regulations 2016, and how we will respond to requests from individuals to access the information (data) we hold about them.

2.4 Where specific activities are subject to legislation, statutory guidance, professional best practice or guidelines with regard to records management, AHA Ltd. will ensure that relevant policies, procedures and practices comply with current requirements, and that we review and

update policies etc. to maintain compliance.

Retention of records

- 2.5 Each section within AHA Ltd. will establish and maintain a schedule of the records they hold, to include:
- a description of each type (category) of record held and its location;
 - classification of data held according to whether it is 'personal' or 'sensitive' as defined by data legislation;
 - whether or not the record is retained and if so, the format it is kept in and the maximum retention period.

For further details see the Records Management procedure including the Document Retention Schedule.

- 2.6 Specific records will be kept permanently as part of AHA Ltd.'s archives, in particular those which have a permanent legal, historical or administrative value, both to provide historical information and as a lasting record of the conduct of AHA Ltd.'s business.

3.0 RESPONSIBILITIES

3.1 Board of Management

- To ensure that there is in place a policy on records management that complies with current legislation and statutory requirements, meets the needs of AHA Ltd. and clearly sets out the roles and responsibilities of management and all employees.
- To monitor compliance with the policy, e.g. through the receiving of reports.
- To deal with any matters arising from the policy that require a Board decision.

3.2 Management

- Chief Executive: Overall responsibility for ensuring that the policy and the supporting procedures are implemented by all employees.
- Heads of Section: Responsible for ensuring that:
 - this policy and procedures are implemented within their Section;
 - clear, logical, accessible file structures in which to hold records are set up;
 - the records within their area of activity are maintained and disposed of in accordance with current good practice so as to ensure the easy, appropriate and timely retrieval of information.

3.3 Employees

- All employees will ensure that the records they are responsible for are complete and accurate records of their activities, and that they are maintained and disposed of in accordance with this policy and procedures.

- All employees will ensure that:
 - appropriate descriptive and contextual information is added throughout each record’s life cycle;
 - records are maintained securely;
 - electronic records are protected during periods of technological change, e.g. during migration to new software or hardware platforms;
 - appropriate access and version controls are applied throughout the life cycle of each record, reflecting both legislative requirements (e.g. under the Data Protection Act) or AHA Ltd. policies.

- Employees responsible for holding the main copy of a record will ensure that it is maintained appropriately, that the versions are controlled and clearly identified, it is accessible and that, where appropriate, it is available on the intranet and the external website.

4.0 REVIEW

4.1 The Chief Executive is responsible for ensuring that the Senior Management Team reviews this policy at least every 5 years

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