



Records Management Policy

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Owner:	Michaela Loughlin	Job Title:	Head of Compliance & Improvement
To be issued to: (check as needed)			
<input checked="" type="checkbox"/> Board of Management <input checked="" type="checkbox"/> All Staff <input type="checkbox"/> ET/SLT <input type="checkbox"/> Head Office Managers <input type="checkbox"/> Head Office Staff <input type="checkbox"/> Finance <input type="checkbox"/> Housing <input type="checkbox"/> Asset <input type="checkbox"/> ICT		<input type="checkbox"/> OD <input type="checkbox"/> Compliance <input type="checkbox"/> All Care & Support <input type="checkbox"/> C&S Managers (RM, OM, CSM) <input type="checkbox"/> C&S Staff <input type="checkbox"/> Contractors <input type="checkbox"/> Agency Staff <input type="checkbox"/> Unite the Union <input type="checkbox"/> Employee Voices Group <input type="checkbox"/> Other: _____	
Method of Delivery: (check as needed)			
<input checked="" type="checkbox"/> Learn Pro <input checked="" type="checkbox"/> Board Portal <input type="checkbox"/> Line Manager to Share (e.g. Agencies)		<input type="checkbox"/> Policy Owner to Notify (e.g. Contractors) <input type="checkbox"/> Other: _____	
Stakeholder Consultation Completed (check as needed)			
<input type="checkbox"/> Board of Management <input type="checkbox"/> All Staff <input checked="" type="checkbox"/> ET/SLT <input type="checkbox"/> Head Office Managers <input type="checkbox"/> Head Office Staff <input type="checkbox"/> Finance <input type="checkbox"/> Housing <input type="checkbox"/> Asset		<input type="checkbox"/> OD <input checked="" type="checkbox"/> Compliance <input type="checkbox"/> All Care & Support <input type="checkbox"/> C&S Managers (RM,OM, CSM) <input type="checkbox"/> C&S Staff <input type="checkbox"/> Contractors <input type="checkbox"/> Agency Staff <input checked="" type="checkbox"/> RGDP (DPO)	

<input type="checkbox"/> ICT	<input type="checkbox"/> Employee Voices Group <input type="checkbox"/> Other: _____
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Version Control

Date	Owner	Version	Reason for Change
May 2024	Michaela Loughlin	1.0	Cyclical review

Summary of Changes

Section	Change
All	New Policy along with related procedure which now replaces the Retention of Documents Procedure G24c. In order to both fulfil our legal obligations and achieve best practice, as a public authority Ark's approach to records management will now be informed by the Model Action Plan for Developing Records Management Arrangement Compliant with The Code of Practice on Records Management Under Section 61 Of The Freedom Of Information (Scotland) Act 2002. National Archives of Scotland.
8	Training requirement incorporated - All staff are required to attend an induction to Records Management training session conducted by Arks Data Protection Lead. This induction training will be specific to each department.
12.1	Audits implemented and will be carried out by the Compliance & Improvement team to monitor and review Arks records to ensure we comply with the requirement to keep or delete data.



Records Management Policy

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1.0 Ark's Values

Ark values should be stated at the heading of every policy. Additional contextual information can be added here if required, relating the policy document to the values.

Arks values are true to the core purpose of the organisation and the services we deliver. They determine our behaviours towards one another and what we should expect in our relationships with one another. Working within the following values will guide and help us deliver our vision and mission of Ark being an organisation where everyone is equal:

Trust

We have confidence in our people to deliver excellent services and trust in them to do so. We will develop trusting and honest relationships and our customers will feel assured that they can rely on us to deliver.

Respect

We treat everyone fairly and we listen. We are respectful of each person with whom we come into contact and expect our people to respond professionally and treat others as they would wish to be treated.

Understanding

We will operate with empathy and compassion and approach each situation with an open mind. We will question and challenge to ensure we achieve the right outcomes for customers and our people.

Equality

We believe everyone is equal and expect our people to create positive experiences where everyone feels valued and included.

Integrity

We will do the right thing and take responsibility for our actions. We will work together to uphold the highest standards of behaviour and practice.

2.0 Purpose

The purpose of this policy and all related policies and procedures is to provide formal guidance to all Ark staff in relation to the management of all Ark records which are used in the furtherance of the organisations business activities.

3.0 Policy Statement

Ark generates and utilises a significant volume of information in the form of records and will adopt a systematic approach to the management of such records in accordance with our legal obligations and recognised best practice. In order to both fulfil our legal obligations and achieve best practice, as a public authority Ark's approach to records management will be informed by the [Model Action Plan for Developing Records Management Arrangement Compliant with The Code of Practice on Records Management Under Section 61 Of The Freedom Of Information \(Scotland\) Act 2002. National Archives of Scotland.](#)

Ark is committed to openness and transparency and in line with the duty to publish requirements, has formally signed up to the [Model Publication Scheme 2018](#) created and approved by the Scottish Information Commissioner.

In the context of this policy Ark's records are defined as being any or all 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. This policy also covers data that is held by third parties on our behalf, for example, cloud storage providers or offsite data storage.

4.0 Scope

All Board of Management members, all staff, including relief, agency or contractors are required to abide by this policy.

5.0 Legal/Regulatory Framework

The legal and regulatory framework which applies to this policy is as follows:

Scottish Ministers' Code of Practice on Records Management issued under Section 61 of the Freedom of Information (Scotland) Act 2002.

Data Protection Act 2018 (GDPR UK).

Environmental Information (Scotland) Regulations 2004.

Human Rights Act 1998.

Care Inspectorate: Guidance on Records for Registered Care Service.

Scottish Council on Archives Local Authority Retention Schedules for Adult Care.

Professional organisations, e.g. T C Young, Solicitors, The Internal Audit Association (TIAA) Companies Acts 1985 & 2006.

Data Protection Act 1998.

Health & Safety at Work etc. Act 1974 (and supporting Regulations);

Limitation Act 1980.

Taxes Management Act 1970.

Pensions Acts 1995 & 2004.
Equality Act 2010.
Protection of Vulnerable Groups (Scotland) Act 2007.

6.0 Responsibilities

6.1 Board of Management

Ark's Board of Management is responsible for consideration and approval of this policy, and for ensuring that its decisions are taken in accordance with relevant legislation, regulatory expectations, training, and guidance.

6.2 Executive Team

Ark's Executive Team is responsible for ensuring that this policy is reviewed in accordance with Ark's schedule for review of policies, or sooner if required. The Executive Team is responsible for ensuring that its decisions, and that the decision of officers, are taken in accordance with relevant legislation, regulatory expectations, training, and guidance.

6.3 Leadership Team

Ark's Leadership Team is responsible for the implementation and review of this policy, and for ensuring that its decisions are taken in accordance with relevant legislation, regulatory expectations, training, and guidance.

6.4 Managers

Managers will be responsible for the effective implementation of this policy within their area of responsibility. They must also ensure that all staff are made aware of this policy and participate in relevant training.

6.5 All Staff

All staff are required to familiarise themselves with this policy and comply with its provisions as well as undertake any training required as part of this policy or associated procedures.

6.6 Third Parties

All agency staff, volunteers and students undertaking duties on behalf of the organisation are required to familiarise themselves with this policy and comply with its provisions.

7.0 Records Management

Records management can be described as the efficient and systematic control of the planning, creation, receipt, maintenance, use, distribution, storage, and disposal/permanent preservation of records throughout their lifecycle. It also concerns placing controls around each stage of a record's lifecycle, at the point of creation or receipt, during its maintenance and use, and at disposal. Through the application of such controls, Ark can ensure its records demonstrate the key features of authenticity, reliability, integrity, and accessibility.

Through the implementation of this policy and all associated policies and procedures Ark will:

Ensure the creation and storage of accurate and reliable records in a managed environment, which provide an effective audit trail of actions.

Increase organisational and administrative effectiveness through improved access to and retrieval of high-quality records.

Uphold information security by facilitating improved confidentiality, integrity and availability of our records.

Improve our working environments and increase organisational efficiency through the reduction in retention of irrelevant, duplicate, and out-of-date records.

Promotes Ark's physical and intellectual control of all records by knowing what records it has and how and where to retrieve them easily.

Ensures that Ark identifies and retains records of historical and evidential value to as a "corporate memory" and to assist in managing any future recurrences of specific events.

Record and maintain audit trails relating to all access and any alteration of records.

Improve information sharing and the provision of easy and timely access to the correct information at the right time, resulting in better quality decision making and accountability for all actions.

Manage business continuity risks by helping to identify records that are essential to continued operation which, if lost or destroyed, would seriously impair, or disrupt Ark's operations.

Avoid any financial, legal, or reputational loss if the necessary evidence of an activity or transaction is not available or cannot be relied upon in the event of, for example, regulatory intervention.

Avoid any non-compliance with legal or regulatory requirements applicable to Ark as a Registered Social Landlord, and identify, protect, and retain records that are critical to Ark's business continuity.

8.0 Learning & Development Requirements

Managers are required to complete induction to Records Management training conducted by Arks Data Protection Lead. This induction training will be specific to each department.

9.0 Related Policies & Procedures

- G25a Records Management Procedure
- G24 Data Protection Policy
- G15 Computer System. E-mail and Internet Policy
- G35 FOI and EIR Policy
- G09 Business Continuity Policy
- G49 Drafting, Reviewing, Filing Approving Policy
- G15a ICT Systems Security
- G24a Information Security and Personal Data
- G24b Subject Rights
- G24c Retention of Documents
- G24d Data Protection
- G24e CCTV
- G24f Smart Doorbells
- G35a Freedom of Information
- G44 Business Continuity
- G57a Adult Support and Protection
- CS22a Duty of Candour

10.0 Equality Impact Assessment (EIA)

No potential equalities issues have been identified in relation to the development of this policy, and consequently an EIA has not been completed.

11.0 Data Protection Impact Assessment (DPIA)

There are no changes within this policy which have data protection implications and consequently a DPIA has not been completed.

12.0 Monitoring and Review

12.1 Monitoring

Ark's Leadership team will monitor implementation of this policy on an ongoing basis.

The Compliance & Improvement team will carry out regular audits of our records and will record good practice and areas for improvement. These findings will be shared with the Leadership Team.

12.2 Review

Ark 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 5 years or earlier, if required by changes in legislation, regulatory guidance, technology, or changes to any of its records management systems.