



### **Verification of readily accessible records**

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<b>Version</b>	3
<b>Policy Contact</b>	Matthew Betteridge
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<b>Target Audience</b>	Agency Workers
<b>Approved by</b>	OneCall24 Policy Team

### **Purpose of this policy**

In order to ensure that full and accurate records of all activities and decisions of One Call 24 are created, managed and retained or disposed of appropriately, and in accordance with relevant legislation a Records Management Policy has been implemented. This will enable One Call 24 to achieve information accessibility, business enhancement and improvement. It will also meet its obligations for accountability while ensuring that it protects the rights and interests of the organisation, its staff, clients and the community.

One Call 24 operate a very transparent policy in order to satisfy the requirements of the authority/participating authority. This includes ensuring that all information, data and other records and documents required are made readily available to the Authority in the format and in accordance with any timescales set out in the Services description.

OneCall24 are hold current membership with the ICO, ensuring that all policies and processes are set in line with guidance supplied.

In order to achieve this, One Call 24 obtain consent from each candidate at registration stage that their personal data can be made readily available and accessible by the relevant and necessary parties, including auditors; participating authorities and any other relevant third parties.

**A Record Management Program has been established by the One Call 24 in accordance with the following acts:**

- The Access to Health Records Act (1990)
- The Data Protection Act (1998)
- Freedom of Information Scotland Act (2002)
- Public Records Act (Scotland) 2011
- Regulation 29 of the Conduct Regulations and Data Protection

**Authority of this policy**

This policy has been authorised by the Managing Director (Matthew Betteridge) and is available to all staff. It has been developed in consultation with staff and will be revised on a regular basis. Ownership of the policy rests with the Matthew Betteridge (MD).

**Application of this policy**

All staff, Board members volunteers, contractors and consultants etc must comply with this policy, in their conduct of official business for One Call 24. This policy applies to records in all formats, including electronic records.

**Records as a resource**

One Call 24 recognises that records are a vital asset to:

- facilitate information accessibility, and enhance business by supporting program delivery, management and administration
- deliver customer services in an efficient, fair and equitable manner
- provide evidence of actions and decisions and precedents for future decision making, and a small percentage of One Call 24's records will become archived

**Records Management Program****Objectives of the Records Management Program**

A records management program is a planned, co-ordinated set of policies, procedures, people, systems and activities that are required to manage records.

**The One Call 24 Records Management Program seeks to ensure that**

- it has the records it needs to support and enhance ongoing business and customer service, meet accountability requirements
- these records are managed efficiently and can be easily accessed and used for as long as they are required
- records are stored as cost-effectively as possible and when no longer required they are disposed of in a timely and efficient manner

A goal of particular note is that the organization is committed, through its Records Management Program, to maintaining digital and other technology dependent records in authentic and accessible form for as long as they are required.

**Storage**

Current hardcopy records should be stored in [designated storage areas for current records] with access restrictions.

Rarely used records or records no longer in use for official purposes that are still required to be retained should be forwarded to Matthew Betteridge (MD).

Electronic records may either be retained online (on servers) or offline (on CD Roms, DVDs, magnetic disks or other removable media). Records of short term value will be disposed of at suitable intervals by Matthew Betteridge (MD). Records of long term or archival value should be retained online wherever possible.

## **Maintenance and monitoring**

The location of each record needs to be recorded and updated at every movement of the record. This ensures that records, as assets, can be accounted.

Maintenance of electronic records can also entail the migration of data. Migrations must be authorised by Matthew Betteridge (MD) and must produce authentic, complete, accessible and useable records.

## **Access**

Records must be available to all authorised staff that require access to them for business purposes.

All access to One Call 24 records by members of the public, including Freedom of Information requests, will be in accordance with:

- The Access to Health Records Act (1990)
- The Data Protection Act (1998)
- Freedom of Information Scotland Act (2002)
- Public Records Act (Scotland) 2011
- Regulation 29 of the Conduct Regulations and Data Protection

## **Regulation 29**

**At all times, One Call 24 agrees to abide by the clauses/terms as set out**

within regulation 29 of the conduct Regulations and Data Protection as detailed below (Guidance taken from [legislation.gov.uk](http://legislation.gov.uk)):

### **Records**

**29.—(1)** Subject to paragraph (6), every agency and every employment business shall keep records which are sufficient to show whether the provisions of the Act and these Regulations are being complied with including (subject to paragraph (3))—

(a) the particulars specified in Schedule 4, in relation to every application received by the agency or employment business from a work-seeker;

(b) the particulars specified in Schedule 5, in relation to every application received by the agency or employment business from a hirer; and

(c) the particulars specified in Schedule 6 relating to dealings with other agencies and employment businesses.

(2) The records mentioned in paragraph (1) shall be kept for at least one year from the date of their creation, and in the case of the particulars referred to in sub-paragraphs (a) and (b) of paragraph (1), at least one year after the date on which the agency or employment business last provides services in the course of its business as an agency or an employment business to the applicant to whom they relate.

(3) Neither an agency nor an employment business is required to keep the particulars referred to in paragraphs (1)(a) or (1)(b) in respect of applications on which the agency or employment business takes no action.

(4) The records mentioned in paragraph (1) may be kept by an agency or employment business, either at any premises it uses for or in connection with the carrying on of an agency or employment business, or elsewhere. If they are kept elsewhere, the agency or employment business shall ensure that they are readily accessible by it and that it is reasonably practicable for any person employed by the agency or employment

business at any premises it uses for or in connection with the carrying on of an agency or employment business to arrange for them to be delivered no later than the end of the second business day following the day on which a request under section 9 of the Act(1) for them is made, to the premises at which that person is employed.

(5) The records an agency or employment business is required to keep pursuant to this regulation may be kept in electronic form, provided that the information so recorded is capable of being reproduced in legible form.

(6) This regulation does not apply to any records which an agency is required to preserve in accordance with paragraph 12 of Schedule 2.

Reference should be made to the following documents, policies and processes in relation to the handing of records:

- Policy 15 - GDPR Data Privacy Policy for Staff and Consultants
- Policy 16 - GDPR Data Retention Policy
- Policy 17 - GDPR Website Privacy Notice
- Policy 18 - GDPR Data Breach Policy
- Policy 18 form - GDPR Data Breach Incident Request Form
- Policy 19 - GDPR Subject Access Request (SAR) Procedure
- Policy 19 form - GDPR Subject Access Request (SAR) Form
- Policy 20 - GDPR Data Privacy Policy for Agency Workers

#### **Review**

This policy statement will be reviewed annually as part of our commitment to upholding professional standards. It may be altered from time to time in the light of legislative changes, operational procedures or other prevailing circumstances.