

PRIMARY PEOPLE LIMITED

Records
Management Policy

RECORDS MANAGEMENT POLICY

Table of Contents:

1	Document Control	2
2	Introduction.....	3
3	General Statement of Primary People Limited Scope.....	3
4	Purposes of this policy	3
5	Scope of this Policy	4
6	Responsibility for Records Management.....	4
7	Standards and Processes	5
7.1	Creation and storing of records	5
7.1.1	Primary People Limited client records.....	5
7.1.2	Permissions capture.....	5
7.1.3	Electronic record keeping systems.....	5
7.1.4	Data is accurate, adequate, relevant and not excessive.....	5
7.2	Retention and deletion of records	5
8	Training	6
9	Contractual Requirements	6

1 Document Control

Document owner	Richard Maun, Director, Primary People Limited
Prepared by	Glow Virtual Assistants
Reviewed by	Richard Maun, Director, Primary People Limited
Approved by	Richard Maun, Director, Primary People Limited
Approved on	15 th May 2018
Next review date	15 th April 2019
Reference	RMP_001
Version	1.0
Classification	Public

Distribution list	
Richard Maun, Director, Primary People Limited	To approve and authorise

Communication	The Records Management Policy is published on public facing websites.
----------------------	---

2 Introduction

Primary People Limited is registered with the Information Commissioners Office (ICO).

Primary People Limited recognises the General Data Protection Regulation (GDPR) and will endeavour to ensure that all personal data is processed in compliance with this regulation from 25 May 2018, the date the regulation comes into force.

This Records Management Policy is written specifically to ensure appropriate compliance with the GDPR and has used the ICO self-assessment guidance for small organisations as at February 2018 for guidance as to the requirements.

3 General Statement of Primary People Limited Scope

This Policy applies to Primary People Limited, comprising of Richard Maun (International Executive Development Specialist), and the Institute of Fellows (an alumni group run by Primary People Ltd).

Primary People Limited processes relevant personal data regarding clients and prospective clients, as part of its operation and shall take all reasonable steps to do so in accordance with this Policy.

Should the scope of the business undertaken by Primary People Limited change, this Policy will be updated to reflect the changes in relation to compliance with the GDPR.

Primary People Limited only operates within the European Union.

4 Purposes of this policy

Primary People Limited records are important sources of client information, and therefore crucial to the current and future operations of the business. This Policy has been implemented to help the business:

- Meet its legal obligations under the appropriate regulations,
- Support the objective of maintaining the business as an effective and developing going concern; and
- Manage information resources effectively, by making sure records can be located, accessed, interpreted, trusted and maintained.

Primary People Limited believes that administrative and management processes benefit from a system of records management that enables it to meet the purposes listed above.

This Policy should be read in conjunction with the Data Protection Policy and the Information Security Policy.

5 Scope of this Policy

Primary People Limited has the overall responsibility for the implementation of this policy in the business.

A record is information created, received and maintained as information by Primary People Limited in pursuance of the transaction of business.

Records can be in either paper or electronic format and both formats are covered by this policy.

This document sets out the overall framework within which Primary People Limited should manage records.

Should it become necessary, Primary People Limited will produce operational procedures and guidance to help implement the objectives of this policy.

6 Responsibility for Records Management

Primary People Limited will create, store, receive and use records as follows:

- Treat all records as a Primary People Limited resource;
- Ensure as far as practicably possible that records are accurate and filed in such a way that they can be easily located, either electronically or physically;
- Keep records no longer than they are needed;
- Keep confidential records in a secure environment;
- Keep records stored in a safe and cost-effective way;
- Allow people to access information only if they need or have a right to do so;
- Create records that are accurate and that do not defame another individual, expose the business to unnecessary risk or to tamper with records in a way that risks them becoming inaccurate;
- Save long term records in an open source or archival format to ensure readability even if systems change.

Primary People Limited shall ensure that records kept are secure and in line with the Information Security Policy and relevant regulation. In addition, new procedures for records management will take account of the Information Security Policy.

Primary People Limited will be responsible for the business being compliant with regulations and professional standards which are relevant to the area of records management.

7 Standards and Processes

The following standards and processes are employed by Primary People Limited in relation to records management undertakings:

7.1 Creation and storing of records

7.1.1 Primary People Limited client records

Paper or electronic records related to Primary People Limited clients, or potential clients, can only be established with written consent from the client, typically this will be in the form of a signed contract. Any deviation from this standard will be on a case by case basis and with the approval of Primary People Limited.

7.1.2 Permissions capture

Where client or prospective client data is being captured electronically, typically through sign up forms on websites, the standard Primary People Limited approach is to use 'double opt-in' which is compatible with the GDPR principles. The use of double opt-in is accepted by existing clients and will be the approach recommended to new clients going forward.

Where client customer or prospective customer data is being captured manually, the appropriate disclosures are made at the point of capture. Generally, once collected, the manual records are captured electronically with a double opt-in request subsequently being issued.

7.1.3 Electronic record keeping systems

Primary People Limited electronic recording keeping largely comprises of data related to clients (e.g. for raising of invoices, access to software and systems) and to prospective clients (e.g. for marketing purposes).

Electronic data is stored across a number of systems. Primary People Limited will conduct an information audit with associated data flows to identify the systems on which it has data stored. The information audit is retained centrally and updated at least annually.

7.1.4 Data is accurate, adequate, relevant and not excessive

Primary People Limited will strive to ensure that the personal data it collects is accurate, adequate, relevant and not excessive.

Where data relates to Primary People Limited clients and prospective clients, only the minimum required to perform the relevant task is collected and stored.

7.2 Retention and deletion of records

Primary People Limited will only retain records for the purpose of his business, that is, records related to the completion of client tasks, within regulatory guidelines.

Generally, retention periods are defined by Primary People Limited and by the clients of Primary People Limited, but always in accordance with the relevant regulation.

Electronic and hard copies of data may be retained for 2 years due to the trend for clients returning within that period.

Hard copies of general information e.g. records of meetings, may be retained for up to 5 years as these do not contain any private or confidential information.

Hard copies of data stored by Primary People Limited may be retained and stored in a locked filing cabinet within a locked office.

Deletion of records will employ best practice as is appropriate at the time. Generally, manual records will as a minimum be shredded, with electronic records being deleted and removed from any history files (deletion from 3rd party systems will utilise the 3rd party deletion routines).

8 Training

Primary People Limited will be responsible for organising an appropriate amount and level of records management training. Training will be delivered periodically alongside related training (Data Protection and Information Security).

Training will be tailored to meet the requirements and structure of the business.

9 Contractual Requirements

Written agreements with clients and with 3rd party service providers will include information security conditions where this is considered to be appropriate.

Where Primary People Limited has control over contractual arrangements, for example, contracts with its clients, Primary People Limited will endeavour to ensure that appropriate information security conditions are considered and accepted.

Where Primary People Limited generally has no control over contractual conditions with 3rd party service providers, Primary People Limited will review the contractual terms and consider on a case by case basis whether it is appropriate to agree to the terms or to seek another provider.