

AssessmentNo	123	Owner	MBUTLER	
Resource	Transformation		Service/Establishment	Regulatory
	First Name	Surname	Job title	
Head Officer	Michael	Butler	Records Management Officer	
	(include job titles/organisation)			
Members	Michael Butler, Ricardo Rea			
	<i>(Please note: the word 'policy' is used as shorthand for strategy policy function or financial decision)</i>			
Policy Title	Records Management Policy			
	The aim, objective, purpose and intended out come of policy			
	This policy is to raise staff awareness of the requirements of records management across WDC services and the obligations that WDC has under the Public Records (Scotland) Act 2011.			
	Service/Partners/Stakeholders/service users involved in the development and/or implementation of policy.			
	Legal Services with Regulatory are responsible for the implementation of this policy. The policy will be submitted to JCF and PAMG before being presented to Corporate Services Committee for approval.			
Does the proposals involve the procurement of any goods or services?			No	
If yes please confirm that you have contacted our procurement services to discuss your requirements.			No	
SCREENING				
<i>You must indicate if there is any relevance to the four areas</i>				
Duty to eliminate discrimination (E), advance equal opportunities (A) or foster good relations (F)			Yes	
Relevance to Human Rights (HR)			Yes	
Relevance to Health Impacts (H)			No	
Relevance to Social Economic Impacts (SE)			No	
Who will be affected by this policy?				
WDC employees and customers / clients who use our services including partner organisations collecting, processing and storing records on behalf of WDC. This policy also applies to members of the public who use or have used our services.				
Who will be/has been involved in the consultation process?				
Discussion among relevant Council officers.				
Please outline any particular need/barriers which equality groups may have in relation to this policy list evidence you are using to support this and whether there is any negative impact on particular groups.				
	Needs	Evidence	Impact	
Age				
Cross Cutting	Council polices need to be open, transparent and accessible	Transparent polices are a benefit to everyone.	Improved information sharing may benefit vulnerable groups. The policy makes clear reference to	

			need for policy and practice to be in Line with the Equality Act 2010 The Council will ensure that its staff are adequately trained in relation to Equalities and Human Rights.
Disability			
Social & Economic Impact			
Sex			
Gender Reassign	<p>The Gender Recognition Act 2004 aimed to safeguard the privacy of transsexual people by defining information in relation to the gender recognition process as protected information. Anyone who acquires that information in an official capacity may be breaking the law if it is disclosed without the subject's consent or unless there is a legal obligation to access or share it. Data sharing and record keeping must take these imperatives into account.</p>	<p>There is wide spread evidence across of considerable discrimination against trans people and those who have transitioned in the past</p>	<p>Staff involved in record keeping and sharing of data , will be adequately trained with regard to equality and human rights to protect peoples data and ensure legal compliance The proposed policy makes specific mention of the Gender Recognition Act 2014</p>
Health			
Human Rights	<p>All approaches to data retention and/or sharing are relevant to Article 8 of the European Convention on Human Rights a right to respect for one's "private and family life, his home and his correspondence"</p>	<p>Under the policy, 6.1.2 All third party contractors engaged by the Council who create, process or retain records on behalf of the Council must have a robust records management plan to ensure efficient management, retention and secure destruction of those</p>	<p>Improved information sharing is a possible benefit in terms of protecting peoples Human Rights The policy makes clear reference to need for policy and practice to be in Line with the Human Rights Act 1988 The Council will ensure that its staff are adequately</p>

		records when appropriate. This is especial important in terms of Article 8.	trained in relation to Equalities and Human Rights.
Marriage & Civil Partnership			
Pregnancy & Maternity			
Race			
Religion and Belief			
Sexual Orientation			
Actions			
Policy has a negative impact on an equality group, but is still to be implemented, please provide justification for this.			
Will the impact of the policy be monitored and reported on an ongoing bases?			
Will be reviewed			
Q7 What is your recommendation for this policy?			
Introduce			
Please provide a meaningful summary of how you have reached the recommendation			
<p>The proposed policy is relevant in terms of both Equalities and Human Rights, it has therefore been impact assessed. The policy as proposed and with supporting training, will help us protect people's rights, especially with regard to Article 8 of the Human Rights Act 1998 which defines a right of respect for private and family life, home and correspondence. In terms of equality considerations, some groups are more likely to be vulnerable than others, for example women are more likely to suffer domestic abuse. Data sharing can be useful in tackling disadvantage; the policy and supporting training will support appropriate data sharing. A Records management policy is a requirement under the Public Records (Scotland) Act 2011. This legislation ensures that the general public have access rights to personal information were they have engaged with WDC at any stage in their lifetime. Not all records that are processed by WDC will be retained due to document retention practices through various legislation that WDC needs to adhere to. However, where life experience documents are created or processed then the public has a right to access them.</p>			