

## Auditing or Monitoring of Recordkeeping Systems

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| <p><b>Purpose</b></p>   | <p>To manage information effectively and efficiently recordkeeping systems are monitored with the intentions of managing ROT (Redundant, Obsolete and Trivial) data.<br/>This process involves identifying what information is captured, where it is captured and by which staff.</p>  |
| <p><b>Type of information Used</b></p>                            | <p>All file types- these may contain Personal or Special Category data</p>   |
| <p><b>Legal basis</b></p>   | <p>GDPR Article 6(1)(e) – processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority</p> <p>GDPR Article 9(2)(h) processing is necessary for the purposes of the provision of health or social care or treatment or the management of health or social care systems and services.</p>   |
| <p><b>How we collect (the source) and use the information</b></p> | <p>Services are targeted at recordkeeping systems to extract metadata, some recordkeeping systems register metadata as information is captured.</p> <p>The analysis of metadata does not usually require access to the content of files but is likely to capture an employees name/username and time, date, place they undertake activity. Staff should be aware that information added to recordkeeping systems, that is not work related, will be included in any analysis/monitoring activity.</p> <p>Information will be shared with staff allowing them to access the information and make a decision whether to move the information into an active recordkeeping system/structure or delete the information. If they information resides in an area and no confirmation is received as to its continual business purpose it may be deleted as part of the monitoring process.</p> |
| <p><b>How long we will keep the information</b></p>               | <p>Completion of activity and the publication of report/analysis</p>   |
| <p><b>Who we will share the information with (recipients)</b></p> | <p>The Information is not shared outside the CCG<br/>Information is shared with the employee.<br/>In cases of misconduct or gross misconduct would be likely information will be shared with investigating officers in the first instance, staff should therefore read the Privacy Notice in relation to the Staff Record.</p>   |