

Institute of Technology Carlow **Records Management Policy**

INSTITUTE OF TECHNOLOGY CARLOW

RECORDS MANAGEMENT POLICY

This policy is intended to be of use to Staff who are responsible for record keeping or those who are reviewing existing record-keeping procedures within the Institute. It provides practical guidelines on record-keeping in accordance with best practice which all staff are obliged to adhere to. The function of the policy is to promote the creation and maintenance of complete, authentic, reliable, accessible and accountable records. The objectives, therefore, are:

- To help us comply with Freedom of Information & Data Protection legislation;
- To ensure we systematically dispose of records when their administrative use has ceased;
- To help us ensure that permanent and vital records are protected.

THE PURPOSE OF RECORDS MANAGEMENT

- To outline guidelines and standards for the administration of Institute records.
- To produce records management procedures and to create retention/disposal schedules for Institute records.
- To ensure preservation of records of permanent value and to establish archival criteria to maintain and assure continued access to appropriate historical records.
- To support both protection of privacy and freedom of information services throughout the Institute.

THE BENEFITS OF RECORDS MANAGEMENT

- To manage the creation and growth of records
- To reduce our operating costs
- To improve efficiency and productivity
- To ensure regulatory compliance
- To minimise litigation risks
- To safeguard vital information
- To support better management decision-making
- To preserve our Institute memory
- To foster professionalism

WHAT IS THE SCOPE OF RECORDS MANAGEMENT

All information created or received by Institute officers or employees in the course of their duties on behalf of the Institute, preserved in the form of records, are covered by this policy. Records can be in a variety of physical forms including:

- Paper documents - both written and printed matter
- Electronic records (i.e. word processing files, data base, spreadsheet files, emails, electronic data on any media etc.)
- Books
- Drawings
- Photographs

Anything on which information is recorded or stored by graphic, electronic or mechanical means, or copies thereof, received by any academic or administrative office of the Institute in connection with the transaction of Institute business and retained by such office as evidence of the activities of the Institute or because of the information contained therein. It is emphasised here that this policy is equally applicable to records created and preserved in electronic format as it is to paper records.

This policy is applicable to all areas and locations of the Institute and includes all departments, offices, units, research centres and areas of work which form part of the Institute structure.

THE CRITICAL FACTOR

OWNERSHIP OF RECORDS

Any policy if it is to be successful and effective has to have organisation-wide support and commitment at every level. Therefore, we as an organisation require commitment across the Institute from Management at every level to all employees. It is the responsibility of every employee to manage their own records effectively. For a full list of all classes of records please refer to the Institutes Records Retention Schedule (Appendix D) which identifies records and the Departments/Functions responsible for them. All records, irrespective of format, (i.e. both textual and electronic, including emails) created or received by Institute officers or employees in the course of their duties on behalf of the Institute, are the property of the Institute and subject to its overall control. **Employees leaving the Institute of Technology Carlow or changing positions within the Institute are to leave all records for their successors.**

MANAGEMENT OF INSTITUTE RECORDS

- All records created by Institute officers or employees in the course of their duties on behalf of the Institute are retained for as long as they are required to meet the legal, administrative, financial and operational requirements of the Institute, after which time they are either destroyed or transferred to the Institute Archives. The final disposition (either destruction or transfer to the Archives) of records is carried out according to approved schedules as outlined in the accompanying Guidelines.
- While the records schedules prescribe the minimum period that Institute records must be retained, offices may, at their discretion, keep the records for a longer period of time if it is deemed necessary.

RESPONSIBILITIES

- It is the responsibility of the individual offices to ensure that the appropriate security measures are observed for maintaining records containing personal or other confidential information. When scheduled for destruction this material must be shredded, pulped, burned or otherwise disposed of to ensure that such information is not disclosed.
- Operational responsibility rests with each Head of Function in central administration, each Head of School, and each Head of Department.

PROCEDURES FOR RECORDS MANAGEMENT

- The creating department/office/unit drafts records retention schedules for Institute records that define the length of time that specified types of records (records series) are to be retained in their active and semi-active phases, as well as their final disposition once they become inactive. (For definitions of these terms, records retention schedules, records series, active and semi-active see Appendix A)
- After the draft schedules have been reviewed and approved by the creating office, they are forwarded for final approval to the Records Management Working Group.
- Following final approval by the RM Working Group, the schedules are returned to the relevant creating office, which then apply the schedules to its records.
- After the records have been retained by the creating offices (in site or off-site storage) for the requisite time as stipulated in the records schedules, they are either destroyed or stored in the local Institute Archive or other approved storage, for permanent retention.

- It should be noted that the Guidelines in the appendices contain schedules which give a generic outline of recommended retention and disposition periods for records series. This is designed to facilitate departments/centres/units etc. in the development of retention and disposal schedules for records. These schedules are based on a determination of the following: legal retention requirements as defined in relevant statutes and regulations, administrative and operational requirements and general best practice. The potential historical value of records is also a consideration.

ELECTRONIC RECORDS

- The same records management principles and policies applied to paper records must also govern the management of electronic records. However, the technological nature of electronic records requires that special consideration be given to matters such as authenticity, accessibility, version control, preservation and disposal.
- Effective electronic records management is only possible through the use of electronic records management software in the context of an overall records management programme defining classification schemes, retention schedules, metadata standards, access rights, etc. In other words, electronic documents must be managed from creation to final disposition and destruction.
- In the absence of any electronic records management systems staff should be encouraged to employ good housekeeping practices in the management of electronic documents i.e. employ a naming convention, have a backup schedule, delete regularly (especially emails), use passwords, produce paper copies if required to maintain the integrity of manual files, etc.
- Electronic records should take on the same retention schedule as their paper counterparts.
- In the case of electronic records stored in file servers or data stored in relational databases where the computer equipment is maintained by the Computer Services Department, the department which created or maintains these records must formally agree backup and recovery procedures with the Computer Services Department. This is to ensure that there is no ambiguity as to which department is responsible for records in the event of hardware failure or accidental deletion of records.
- Further analysis and investigation of the issues relating to electronic records management is required before more detailed guidelines or procedures can be formulated.

APPENDIX A

DEFINITIONS

Institute Records

Records created or received by Institute officers or employees in the course of their duties on behalf of the Institute, can be in a variety of physical forms including: paper documents including both written and printed matter, books, drawings, electronic data on any media, photographs, or any thing on which information is recorded or stored by graphic, electronic or mechanical means, or copies thereof received by an academic or administrative office of the Institute in connection with the transaction of Institute business and retained by such office as evidence of the activities of the Institute or because of the information contained therein.

Active Records

Active records are records, which are required and referred to constantly for current use, and which need to be retained and maintained in office space and equipment close to users.

Semi-active Records

Semi- Active records are records, which are referred to infrequently and are not required constantly for current use. Semi-active records are removed from office space to lower cost off-site storage until they are no longer needed.

Inactive records

Inactive records are records for which the active and semi-active retention periods have lapsed and which are no longer required to carry out the functions for which they were created.

Permanently valuable records – Archives

Permanently valuable records include those with legal, operational, administrative, historical, scientific cultural and social significance.

Records Retention Schedule

A Records Retention Schedule is a control document that describes the Institute's corporate records at a series level and indicates the length of time each series shall be retained as active before transfer to the semi-active storage; the length of time each series should be retained as semi-active prior to final disposition; and the final disposition of each series. This document serves as the legal authorisation for the disposal of records.

Disposition

Disposition is the action taken in regard to the disposal of active records, which can involve physical destruction by means of security shredding or recycling; transfer to archival storage for selective or full retention; or special disposition through a formal act of alienation from the custody of the Institute.

Record Series

Groups of related records, which are created and used with a common purpose, for example, financial records; personnel records; examination results, committee minutes etc.

Permanent

To be retained permanently by the office. Alternatively if the records are considered inactive, arrangements may be made to have them transferred to an external storage facility.

APPENDIX B

Institute of Technology Carlow Records Management Guidelines for Staff

Why do we keep Records?

We create records to support and enable us to conduct our business process, to ensure accountability, to fulfil our legal obligations and to ensure the continuous operation of Institute in the event of a disaster. As such they have administrative, evidential, legal and fiscal value. Further, with regard to legislation most notably the 1988 Data Protection Act and the 2014 Freedom of Information Act, we are obliged to keep up-to-date records and efficient means of accessing them to fulfil our legal commitments.

Areas of particular concern in the context of Freedom of Information compliance include:

- Difficulties in identifying records or files in their entirety without an enormous amount of detective work. This problem is caused by practices that include holding of hybrid paper and electronic versions of files without any form of integration and cross referencing, related information being held by several members of staff and poor management of draft and definitive versions of documents.
- Rampant duplication of information. Under Freedom of Information, a requester is entitled to be informed of the existence of duplicate copies of a record and access these copies if he or she so wishes. Although this is an unlikely request, it may cause problems if the request is vexatious in intent.
- Poor informational quality of some records or absence of documentary evidence of a transaction caused by concerns that keeping confidential information related to an individual may be problematic.

What is the Lifecycle of a Record?

Each record has a Life Cycle, which is as follows:

1. Current Records - Are those that are held on site in offices and are used on a very regular basis.
2. Non-current Records - These are records that are needed for occasional reference. Can be held on site in a dedicated storage area (Records Management Centre) or stored off site with easy access.
3. Disposition - Records should either be archived or disposed of.

Retention and Disposal

The Institutes Records Retention Schedule details all records within the Institute. This will be implemented at Departmental/Functional level and reviewed on an annual basis. It is the responsibility of the Head of School/Department/Function to ensure that records are scheduled as necessary to be retained in the appropriate storage facility or disposed of. If a file is to be destroyed, then a Records Destruction Certificate needs to be completed by the employee for that area and countersigned by the senior member of staff responsible for records destruction. The Destruction Certificates should be filed and kept permanently.

The **benefits** of using records schedules are as follows:

- Ensures that our important records are organised and maintained in such a way as to be easily retrieved and identifiable as evidence of our activities especially in the event of an audit, a Freedom of Information request or discovery in a lawsuit.
- Conserves office space and equipment by using filing cabinets only to store active paper records and conserves server space by streamlining electronic records captured into electronic document management packages.
- Saves money by moving inactive files to other storage areas until they are ready for final disposition.
- Helps preserve those records that are valuable for historical or other research purposes.
- Controls the growth of records in offices through the systematic disposition of non-current records.

Current Record Keeping

Departments should ensure that if using filing cabinets they are updated regularly and well organised.

Vital Records

A list of the vital records held within the Institute should be drawn up. Minutes of Board of Governors meetings, Sub-committee meetings, financial information, legal documentation etc should be included in this. It is recommended that vital records be duplicated with one set being stored on site and the other off site in case of a disaster such as fire.

Accountability

Our overall responsibilities as an organisation

Our responsibilities at Institute level are to make and preserve records that contain adequate and proper documentation of the organisation, functions, policies, decisions, procedures and essential transactions of the Institute. Our systems are also designed to protect the legal and financial rights of those directly affected by the Institutes activities.

Employee responsibilities

This policy will impact on all areas of our organisational work practices, e.g., those who create records in any format, have access to records, or have management responsibility for staff engaged in any of these activities.

All employees, academic and non-academic, are responsible for making and keeping the records of their work and should

- Create records needed to do the business of the Institute, record decisions and actions taken, and generally document activities for which they are responsible and take care of records so that information can be found when needed. This means establishing or adhering to good directories and files, and filing materials (in any format) regularly and carefully in a manner that allows them to be safely stored and efficiently retrieved when necessary.
- Carry out the disposition of records, which are under their control in accordance with the Institutes records schedule.

Legislation

There is a wide variety of legislation governing records and record keeping in Ireland. With increasing demands for the public sector to adhere to a more accountable and transparent way of operating, the volume of legislation governing record keeping is constantly growing. This has implications for those responsible for systems maintenance, review and auditing, business continuity, records retention and disposition. The Freedom of Information Officer and Senior Management, along with Heads of Departments and Function, therefore, have a major input in the way records are managed. For example relating to law there are the following Acts:

The Freedom of Information Act

It is important to note that the Freedom of Information Act 2014 does not preclude the destruction of records. Therefore, FOI does not need to be considered when formulating a records retention and disposition policy. However, where it does have impact is the need for the Institute to fully document all procedures in order to remain open and accountable.

The Data Protection Act

The Data Protection Act 1988 covers information, kept in electronic systems or on computer, which relates to a living person. By an EU Directive (95/46/EC) this Act will now extend the remit of this Act to paper records. The Act specifies that information must be adequate, relevant and not excessive in relation to the purposes for which it is kept. It also states that this data should not be kept for longer than is necessary.

Companies Acts (1963-1990)

Company law dictates how records are kept in order that they are legally valid evidence of company activities: Minutes of meetings must be signed and dated and also available for inspection. Company accounts shall be preserved for 6 years after the date to which they relate.

As already mentioned, all employees have a responsibility to ensure their records are created with care and due consideration for the records management process.

Privacy and Confidentiality

The Institute is committed to adhering to sound procedures to ensure the security, privacy and confidentiality of all its records. However, Institute of Technology Carlow falls within the remit of The Freedom of Information Act and, therefore, is legally obliged to make its records available to the public on request. Notwithstanding this, the Institute will use its best endeavours to protect information that is received in confidence and on the understanding that it will be treated as such.

Performance Management

Institute of Technology Carlow is committed to ensuring that this Records Management policy is adhered to and is being used in a proper and adequate manner. It endeavours to continuously review the process on a regular basis so that the best practice can always be applied to our records management system.

APPENDIX C

Filing Guidelines

1. Before filing a piece of paper, ask yourself, "Will I need this in the future?" Don't keep a piece of paper just on the chance that you may need it "someday."
2. Don't always save every draft of a document. For most purposes the final version is sufficient.
3. Don't file multiple copies of the same document.
4. The originator normally keeps copies of reports and correspondence. Just because a document is sent to you doesn't obligate you to keep it indefinitely. If you need to see it again, ask the originator for another copy.
5. Don't file periodicals or newspaper clippings unless you refer to them frequently. Use the library.
6. If, for example, records are scheduled for destruction after three years, don't store them for five years.
7. In general, records received from Institute offices should be filed under the name of the originating office.
8. Some records seem to belong under more than one series or category. To handle this, file the records in one category and place a cross-reference note in the other. It is important to be consistent in deciding where to file records. Once information is filed in a given series and category, it should always be filed there.
9. Label and date all files. The proper format for tab titles: Ex: DEPARTMENTAL OFFICE RECORDS: Financial Records, Budget, 1971
10. Color-coding the different series is a useful tool, especially for refiling folders.
11. Create a file guide with a description of your filing system and instructions for the user so new personnel can continue to use the filing system easily. This will also avoid the arbitrary creation of new file folders.
12. Create cross-listings to help locate items. Create a file database on your PC using your file-folder heading, cross-listing, and location notes.
13. Spell out acronyms and abbreviations.
14. Sort records prior to filing.
15. Use staples rather than paper clips in folders.
16. Discard envelopes if the return address is available on the document itself. Most phone messages, illegible notes, and routine acknowledgements can also be discarded.
17. Do not overstuff your file folders. If they are overstuffed, divide them into several folders with the same name and Roman numerals (ex: DEPARTMENTAL OFFICE RECORDS: Financial Records, Budget, 1971, I,...Budget, 1971, II). Your file headings may be too

broad - being more specific may help. On the other hand, being too specific may result in one document per folder. Try to find a happy medium.

- 18.** Do not overstuff your file drawers. This can make retrieval of files difficult, as well as creating a dangerous work environment.
- 19.** Weed files regularly, using established retention schedules. You can send records scheduled for destruction to the Records Center for storage until their retention requirements expire and send records scheduled for permanent retention to the Archives.
- 20.** Use "Out Markers" when removing folders for use. This makes refiling much easier and lets others in the office know that a file exists so another is not created, who has the file, and when it was checked out.
- 21.** If you must keep your semi-active records somewhere other than your office, keep a complete inventory handy. Include retention dates to keep track of when these records will be eligible for destruction.