

INSTITUTE OF TECHNOLOGY TALLAGHT RECORD MANAGEMENT & RETENTION POLICY

INTRODUCTION

Under the Freedom of Information Acts, 1997 and 2003 the Institute is obliged to comply with legislation and publish a Records Management and Retention Policy to ensure that it: -

1. Manages the information which it generates and receives in the course of its business in an effective and secure manner.
2. Makes this information available to the public in response to specific requests.

In addition to these legislative requirements, the Institute is committed to maximising the utilisation of its resources (i.e. staff, equipment and facilities) and ensuring 'openness and transparency' in the decision-making process.

In order to meet these objectives, the Institute will endeavour to ensure that all records that have regulatory, statutory or business value are effectively managed, i.e. that they can be: -

- Captured, stored and protected against damage, loss or unauthorised access.
- Efficiently retrieved in response to requests received from the Public.
- Preserved in such a way as to ensure their ongoing retrievability and readability.
- Retained for periods of time consistent with regulatory, statutory and legal requirements.

RECORDS MANAGEMENT POLICY

The purpose of this Records Management Policy is to ensure the creation and management of authentic, reliable, complete and usable records, capable of supporting the Institute's functions and activities for as long as they are required. The objectives of the policy are to:-

- support Records Management within the Institute;
- support organisational compliance with legislation and Institute regulations;
- ensure the preservation of records of permanent value and establish criteria to maintain and assure continued access for the Institute to appropriate historical records.

THE IMPORTANCE OF RECORDS MANAGEMENT IN IT TALLAGHT

The successful implementation of the F.O.I. Acts, 1997 and 2003 in the Institute and our ability to respond to requests within the tight timescale allowed under the Acts, will depend greatly on the quality of our Records Management System. The Institute is committed to ensuring that access to records is achieved using efficient and effective mechanisms and to demonstrate that its business activities have been conducted in compliance with appropriate regulations and internal standards. Good records management is of especial significance in the context of the Institute's function, where the maintenance of academic records is a core activity.

The aim of the Records Management and Retention Policy in IT Tallaght is to support the efficiency in the management of individual departments and to consequently improve

the overall effectiveness of the Institute. The Records Management and Retention Policy will seek to improve the approach across all departments and units in relation to archiving and disposing of documents.

The Records Management and Retention Policy in IT Tallaght will inform staff on the types of records which must be held, the retention periods for such records and appropriate systems and methods for archival or disposition of such records.

DEFINITION OF RECORDS MANAGEMENT

Records Management is the application of systematic control over information which is required in the administration and operation of Institute activities. By assuring that valuable records are preserved and made available while needless records are disposed of in a timely fashion, records management promotes economy and efficiency within an organisation.

Records management involves: -

- determining what records the Institute has to retain in order to function and carry out its responsibilities;
- how long those records have to be retained, whether for administrative, financial or legal reasons;
- who in the organisation is responsible for which records; and
- the final disposition of those records, whether it be destruction, permanent retention or transfer to the Institute Archives.

Proper records management assures that important records are preserved and made available to the organisation that creates or acquires them, while records that are no longer needed are disposed of in a timely fashion and useless records not created or kept. By doing so, it enhances the efficiency of an organisation.

The services provided through a Records Management programme include correspondence management, manuals and directives management, forms management, files management, records retention scheduling, archives programmes, semi-active records storage, records conversion and archival programming. The records management programme identifies the phases which records go through.

1. 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.

2. Semi-active Records

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

3. Inactive Records

Inactive records are records which are no longer required to carry out the functions for which they were originally created.

4. Permanently valuable records - Archives

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

- **Record Series/Classes**

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

- **Records Retention Schedules**

A Records Retention Schedule is a control document that describes the Institute's corporate records at a series level (see above) 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 transfer (*alienation*) from the custody of the Institute.

Office of Primary Responsibility

The Institute, School, Department, office or unit, which is responsible for retaining the Institute's "official" copy of a record. For example, the Registrar's Office is the office of primary responsibility for student records; similarly Human Resources is responsible for maintaining personnel and employment records.

DEFINITION OF A RECORD FOR THE PURPOSE OF COMPLIANCE WITH THE F.O.I. ACTS, 1997 & 2003

All documents created and received in the course of its official business constitute the official records of the Institute of Technology, Tallaght. The information that Institute records contain serves as evidence of functions executed and activities performed, and comprise a vital source of information as to how and why decisions were taken. Given that good quality records are of value to any organisation, their effective management is necessary to ensure that the records maintained are authentic, reliable and complete and to ensure that they are protected and preserved as evidence to support future actions and to ensure current and future accountability.

Under the Freedom of Information Acts, 1997 and 2003, a record includes any memorandum, text or other document, any photograph, film or recording, or any form in which data are held (whether manual, mechanical or electronic), and anything that is a part, or a copy, or a combination of the foregoing. Your personal notes scribbled on a page form a record, even yellow post-it stickers could count as a record. If a document has been photocopied, only one record exists. However, if additions/amendments have been made to a copy, another record may exist. Existing records may not be deleted or amended.

Correction of typographical errors, factual mistakes and mere rephrasing do not necessitate holding previous editions of a document. This does not constitute destruction or alteration of a record.

However, draft editions of a document (e.g. of a policy) are records - they document the decision making process and, under the Acts, a member of the public is entitled to this information if they so request.

The documents created, received and used by the Institute in carrying out its functions constitute its official records because their content serves as evidence of those functions and because they testify as to how and why decisions were taken. The Institute regards all recorded information, regardless of format, created and received during the performance of official duties as part of its official record holdings.

All emails are Institute records not private records. They can be retrieved in the collection of records for scheduling by a Decision Maker.

Private email (i.e. correspondence by staff members of a private nature not connected with the official business of a Department) has no record status.

A voicemail is a record. If a piece of artwork in the Institute has been paid for by public money it is a record.

While the following documents are "Records" as defined by the F.O.I. Acts, it has been agreed that Institute Policy determine that they are destroyed within 24 hours and as such are not available for release under an FOI request:

- Unsolicited Advertising/Promotional Material
- Product Brochures/Catalogues
- Unsolicited emails
- Trade publications by companies or public bodies
- Personal emails (not relating to Institute activities)

SCOPE OF RECORDS IN I. T. TALLAGHT

Institute Records/Corporate 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 such as: paper documents including both written and printed matter, books, drawings, electronic data on any media, photographs, or anything on which information is recorded or stored by graphic, electronic or mechanical means, or copies thereof. All records 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, are Institute records.

Files

The filing systems in I.T. Tallaght include paper Files, Electronic Document Management Images, Microfilm/Microfiche, Computer Generated Reports (Printouts), and other Electronic Media including Computer Disk and Tape where information is stored in a variety of formats (WP Documents, Spreadsheets, Databases, HTML etc.)

The status of documents as records in these systems will be determined in accordance with this policy.

Draft Documents/Working Papers

These items constitute a record if they:

- Evaluate policy options or alternatives.

- Were drafted for official purposes, (e.g. appraisal, approval, comment etc.).
- Contain relevant information, such as substantive annotations, agreements or comments which add to the proper understanding of the formulation and execution of Institute policies, decisions, responsibilities or actions.
- Contain material not yet transcribed into more formal documents (notes taken at meetings, notes of a phone call etc.). Once transcribed this material can then be destroyed.

Draft documents can be incomplete, complete or final. Complete and final drafts constitute records of the Institute while incomplete drafts would generally not be considered records.

Support/Background Documents

Support Documents (complete drafts, annotated copies of complete drafts, working papers, policy options, studies, memoranda, correspondence that supports policy developments etc.) must be retained on file where they are:

1. Needed to document and understand the evaluation of policy options, including rejected options.
2. Needed to understand the basis for deciding specific policy choices and courses of action.
3. Needed to supplement information in other records. (Technical documentation, drawings, calendars, calculations etc.)

For all records it will be necessary for the first complete draft and the final draft of a record to be preserved, along with all intermediate and complete drafts and all associated annotation/comment records - thereby recording fully the process by which the final draft evolved.

Minutes of Meetings

It has been agreed that the hand-written manuscript can be destroyed when the Minutes have been typed and approved. A mere recording of decisions of a meeting does not give the flavour of the discussion which led to a decision, therefore, in this case, the manuscript record must not be destroyed.

- Recording minutes - do not record every discussion as verbatim. Record objective statements that explain concisely and accurately the subject discussed, the decision taken and the desired action. Record a quotation only if the individual concerned expressly desires it.
- Rough minutes - destroy rough minutes once the final version has been prepared.

Financial Records

By law, financial documents will be held for a minimum of 7 years.

Personnel Records

Personnel files are held indefinitely except where a policy exists for removal of records e.g. written warnings are expunged after x time.

Emails

All emails are Institute records not private records. They can be retrieved in the collection of records for scheduling by a Decision Maker. Private email (i.e. correspondence by staff members of a private nature not connected with the official business of a Department) has no record status.

Staff members are encouraged to control their individual volume of emails by periodically deleting non-essential materials e.g. copies of minutes, or other information available elsewhere, diary events, unsolicited emails from external sources and inconsequential personal matters.

However, emails which fall within the definition of perpetual records under the FOI Acts are maintained whether within the staff members allotted space or centrally archived.

Email is potentially a record as its content usually concerns official business. It is therefore accessible under FOI. It is preferable to treat it like traditional incoming or outgoing correspondence by printing down, taking the necessary action and filing. The electronic version is still, however, accessible under FOI.

Records of Telephone Conversations

A voicemail is a record. The Meridian Mail voicemail system in the Institute automatically deletes voicemail messages at 12 midnight on the day they are listened to. Individual members of staff can delete messages on their individual phone unit.

Records of all significant telephone conversations, informal meetings, and oral decisions should be taken and retained. These constitute records for the purpose of the F.O.I. Acts.

Facsimile

The record status of facsimile transmissions should be determined either at time of transmission or receipt. If a fax has record status it should be placed in the appropriate official file.

Fax messages are automatically deleted when the buffer of the various fax machines get full.

Some fax messages are stored on computer hard drives where fax facilities are available on individual computers.

Exam Papers

Historical Exam Papers are held indefinitely in the Library.

Examination Scripts are held for 18 months in the Examination Section of Student Services.

Coursework Assessment Records

It is Institute policy to return all coursework, where this is practical, to students after assessment to enable them to inform themselves of their progress. Students should retain any returned coursework and make it available to the Institute on request during the academic year of its creation. Following final examination board meetings, all assessed materials held by the Institute will be made available to students and will be disposed of if not collected within a period of three weeks. In some instances the materials used in the creation of coursework (eg physical models) may remain the property of the Institute.

Where the nature of the coursework requires departure from this policy, the department will publish an appropriate specific policy.

Diaries

A diary is a record and accessible under FOI. Where a business diary also contains personal information this will be protected by being blacked out before release. It is best to keep personal and business appointments in separate diaries.

References

A reference provided by an individual in an organisation coming within the ambit of the FOI Act in the course of his or her official duties is not considered to be confidential information and can be released to the individual to whom it relates if requested.

Where a reference requested by an individual to whom it relates has been provided outside the ambit of the FOI Act, the provider of the reference is consulted before release and may appeal the decision to release to the Information Commissioner. It must, however, be clearly identified as confidential.

Websites

Websites that are no longer live due to replacement or removal are accessible under FOI. Printing down and filing is not as satisfactory as filing electronically or to CD. Where there is interaction with a student/lecturer/client via the web all such information must be taken into a record-keeping system.

Copies of Records

Copies of records may hold record status depending on their use - copy of a report on a file supporting a decision achieves the status of a record while a copy retained in another file for reference purposes only may not.

Computer Database Records, Computer-Generated Reports, Spreadsheets

Records held on computer databases and spreadsheets will be accessible under F.O.I. Similarly computer generated reports will also be accessible and all such reports should be examined to determine if they achieve the status of a record.

Contractor Records

Records created by contractors, consultants or outside agencies performing functions on behalf of the Institute may be needed to support the adequacy and accuracy of Institute records. Contract provisions should explicitly define the documentation to be created and maintained by the contractor. Departments/Sections should also make clear in contracts any information that may be discoverable under the provisions of the Freedom of Information Acts, 1997 & 2003 and for how long such information should be retained by the contractor. Access to such records is provided for in Section 6(9) of the F.O.I. Acts, 1997 and 2003.

Post It Notes and Stickers

"Post It" notes should not be left permanently on files. In the event of information on "Post It" notes being classified as a record the information should be transcribed to a standard paper note or the "Post It" Note photocopied and then stored on the file.

Architectural, Microfile, Photographic, Audiovisual, Multimedia, Technical Records

While these information storage mediums will, in normal circumstances, hold record status it may not be practical to store them on official files. Such material should be stored in appropriate environmental conditions with the official file containing a cross reference to such records identifying its location etc.

Legal Cases

All documents relating to legal issues are maintained for the duration of a legal case even if they would have been destroyed earlier.

Personal Files

All personal files, other than those with timed release/destruction limits, are held for a minimum of 10 years but his policy is subject to review.

Photocopies

Where precise copies exist (i.e. photocopies) in multiple locations, only one record exists - this is in the office of its originating source.

Non-Record Documentary Material

The following are generally regarded as non-record materials:-

- Institute documentary materials that do not meet the definition or conditions of Institute record status.
- Extra copies of records, where the sole reason for such copies is for convenience or reference.
- Copies of Institute publications and computer generated reports (which do not comply with the definition of a record as referred to in an earlier paragraph).
- Personal documentation stored on paper or on computer files that do not relate to, or have an effect on, Institute business.

RECORD RETENTION SCHEDULE

This policy sets out the minimum periods for which records should be retained. It is intended that this policy will be regularly updated to reflect and incorporate new and additional record categories.

The record retention schedule provides a mechanism to help ensure the Institute is maintaining necessary records for an appropriate length of time.

The Institute is committed to effective records retention to ensure that it

- meets legal standards;
- optimises the use of space;
- minimises the cost of record retention;
- preserves the history of the Institute;
- destroys outdated and useless records.

Records included in the record retention schedule should be original, unique or of continuing importance to the Institute. They should have legal, fiscal, administrative or historical purpose. Duplicate or multiple copies of these records should be disposed of when they are outdated and no longer useful.

Retention Period

The retention period should be the length of time that the record is useful or required to be kept by an external source, such as a law. Although a length of time may be specified some departments may elect to keep some documents longer. This is a decision for each particular departments, however, space requirements and costs should be considered. If any record is related to an unresolved complaint, dispute or litigation involving the Institute, that record should not be discarded or destroyed regardless of the provisions of this record retention schedule.

Destruction of records

Records whose retention periods have expired should be destroyed promptly. Obsolete records absorb space, equipment, and supplies needed for active records, and make it more difficult to retrieve needed information from overcrowded filing cabinets. To destroy records:

1. Document the destruction of records according to your department's internal policies. The department head should approve any destruction of records; persons who create or use the records should be informed of the decision.
2. Shred, burn, or pulverise records relating to personnel, medical, and student records, and other records that contain personal, evaluative, or confidential information. Other records may be recycled or destroyed according to standard procedures.