

# **Records Management & Retention Policy**

**2017**



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| <b>Title:</b>           | Records Management & Retention Policy   |
| <b>Purpose</b>          | To outline the approved ATI management approach to Records Management & Retention Policy  |
| <b>Publication Date</b> | March 2017  |
| <b>Target Audience</b>  | All ATI employees and data subjects   |
| <b>Review Date</b>      | March 2018  |
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## **1. Introduction**

- 1.1 All records created and received in the course of its official business constitute the official records of Accounting Technicians Ireland.
- 1.2 The information contained therein serves as evidence of functions executed and activities performed, and comprises a vital source of knowledge regarding how and why decisions were taken.

## **2. Purpose and Objectives**

- 2.1 The Purpose of this Records Management & Retention Policy is to ensure the creation and management of complete, usable and reliable records, which are capable of supporting ATI's functions and activities and which ensure accountability for as long as is required.

- 2.2 The objectives of this policy are to:

Support records management within ATI  
Support ATI's administrative and operational requirements, including adherence to ATI policies and compliance with relative legislation.  
Ensure preservation of records of permanent value and to ensure continued access to appropriate historical records;  
Promote day-to-day efficiency and good office management;  
Ensure timely destruction of records that no longer need to be retained.

- 2.3 This policy applies equally to records created and preserved in electronic and paper formats.

## **3. Records Management**

- 3.1 Records Management is the application of controls and procedures to the creation, maintenance, use and disposal of records in accordance with approved procedures.

- 3.2 Records Management includes inter alia: records classification; management of filing systems, retention scheduling; the administration of inactive records storage; disaster planning; vital records protection; archival preservation activities and appropriate destruction of records.

## **4. Ownership of records**

- 4.1 All records (including emails, images, photographs, databases etc.) that are created by ATI employees in the course of their duties are the property of ATI.
- 4.2 All records received are in the care of ATI and are also subject to ATI's overall control and to the provisions of this policy.

## **5. Responsibilities of ATI Employees**

- 5.1 This policy applies to all areas and locations of ATI and includes all departments, offices and areas of work which form part of the ATI structure.
- 5.2 Operational responsibility for the implementation of this policy rests with the Manager of each Department.
- 5.3 The confidentiality of information within records must be safeguarded at all times. It is the responsibility of each department to ensure that the appropriate security measures are observed for maintaining records containing personal or other confidential information.
- 5.4 Once records have been retained for the requisite time as stipulated in the attached retention schedule, they must be destroyed or archived for permanent retention as set out in the schedule.
- 5.5 When scheduled for destruction, records must be shredded, pulped or otherwise disposed of securely. The manner of destruction of records must be appropriate to the level of confidentiality of the records.
- 5.6 In the case of in-house destruction, the department should document and retain the date and manner of destruction of records.
- 5.7 In the case of third-party destruction, a certificate or docket confirming destruction should be received and retained as proof destruction.

## **6. Definition of a Record**

- 6.1 Records are documents in all formats, which are created/received and maintained as evidence of business completed or as a source of knowledge and which must be retained for as long as required to meet legal, administrative, financial, operational or historic needs of the business in ATI.
- 6.2 The Freedom of Information Act, 2014, defines a 'record' as follows:
  - (a) A book or other written or printed material in any form (including in any electronic device or in machine readable form);
  - (b) A map, plan or drawing
  - (c) A disc, tape or other mechanical or electronic device in which data other than visual images are embodied so as to be capable, with or without the aid of some other mechanical or electronic equipment, of being reproduced from the disc, tape or other device.
  - (d) A film, disc, tape or other mechanical or electrical device in which visual images are embodied so as to be capable, with or without the aid of some other mechanical or electronic equipment, of being reproduced from the film, disc, tape or other device
  - (e) A copy or part of any thing which falls within paragraph (a), (b), (c), or (d).
- 6.3 Further definitions relating to records and record management are set out in Appendix 1 to this policy.

## **7. Forms of Records**

7.1 Records may exist in a variety of physical forms including:

Paper documents (written or printed matter);  
Electronic records (i.e. word processing files, databases, spreadsheet files, emails, CCTV footage, electronic data on any media etc.)  
Books, drawings and photographs;  
Anything on which information is recorded or stored by graphic, electronic or mechanical means;  
Copies of original records

7.2 Electronic Records

7.2.1 The nature of electronic records requires that consideration be given to security, authenticity, accessibility, version control, preservation (e.g. back up records) and the disposal of such records.

7.2.2 Staff must employ the following good housekeeping practices in the management of electronic records:  
Sensible and consistent naming of files and folders;  
Systematic indexing/classification of records;  
Backup of appropriate files on a regular basis;  
Delete records regularly (including email records) in accordance with the attached retention schedule;  
Restrict access to record systems (use of passwords, timed lock out of PCs etc.);  
Particularly sensitive records to be emailed to external bodies should be password protected;  
Produce paper copies if required to maintain the integrity of manual files, etc;

7.2.3 In the case of electronic records where the computer equipment is maintained by the ATI, the department which creates/maintains these records must formally agree backup and recovery procedures with the Director of Finance and IT. This is to ensure that there is no ambiguity as to which office is responsible for records in the event of hardware failure or accidental deletion of records.

7.2.4 Where electronic records are kept on systems not maintained by ATI, a formal inventory of such records must be maintained by the Data Protection Officer.

## **8. Management and Retention of Records**

8.1 Records should be retained as long as they are required to meet the legal, administrative, financial and operational requirements of ATI during which time they should be filed appropriately. Following a period of time, as set out in the attached retention schedule, they are either archived or destroyed.

8.2 ATI records must be sorted and filed on a basis that ensures efficient

- retrieval.
- 8.3 Appropriate filing/archival or destruction of records is to be carried out in accordance with the attached retention schedule.
  - 8.4 The retention schedule is based on a determination of legal retention requirements as defined in relevant legislation (Safety and Welfare at Work Acts 2001 & 2005; Freedom of Information Acts 1997 & 2003; Data Protection Acts 1988 & 2003 etc.) as well as ATI policies and procedures; administrative and operational requirements, historical value and general best practice.

## **9. Record Retention Schedule**

- 9.1 The attached records retention schedule prescribes the retention period for a range of records held by ATI.
- 9.2 Any department which considers that records should be retained for a longer period than set down in ATI retention schedule is required to contact the Data Protection Officer to ensure that reasonable justification exists for their retention and, in the case of records which contain personal information, to ensure compliance with the Data Protection Acts (1988 and 2003).