



City of Dublin Education and Training Board

Records Management Policy

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1. Purpose

- 1.1 To provide a statement of intent outlining records management standards for the administration of **City of Dublin Education and Training Board** (the ETB) records.

All documents created and received in the course of its official business, as laid out in the Education and Training Boards Act 2013 and formerly under the Vocational Education Act 1930 to 2001, constitute the official records of the ETB. The information that the ETB records contain serves as evidence of functions executed and activities performed and comprises a valuable source of knowledge 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.

- 1.2 **To implement records management procedures and to create retention/disposal schedules for ETB records.**

Records management is the application of controls to the creation, maintenance, use and disposal of all formats of records, elements of which include correspondence and forms, records classification, files, identification of the function/staff member responsible for the record, retention scheduling, disaster planning, vital records protection, the administration of inactive records storage, record conversion programmes, archival preservation activities and destruction of records.

Good records management is of special significance in the context of the ETB's functions, where the maintenance of records is essential to good corporate governance.

- 1.3 To ensure preservation of records of permanent value and to establish archival criteria to maintain and assure continued access to appropriate historical records.
- 1.4 To support both protection of privacy and freedom of information services throughout the ETB.
- 1.5 To propose the development of guidelines to accompany this policy document including retention and disposal schedules for general records common to all ETB departments and sections/units.
- 1.6 To develop policies and guidelines for the use of electronic media in the creation/capture/receipt/retention of information.

2. Scope

- 2.1 All information created or received by ETB staff in the course of their duties on behalf of the ETB, 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, databases, spreadsheet files, e-mails, electronic data on any media, etc.); books; drawings; photographs; or any thing 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 ETB in connection with the transaction of ETB business and retained by such office as evidence of the activities of the ETB or because of the information contained therein. **It is emphasised here that this policy is equally applicable to records created and preserved in electronic and digital format as it is to paper records.**
- 2.2 This policy applies to records that may be released under the Freedom of Information Act 2014 and the Data Protection Acts 1988 and 2003.
- 2.2 This policy is applicable to all areas and locations of the ETB and includes all departments, offices, schools, institutes, centres and areas of work which form part of the ETB structure.

3. Ownership of Records

All records, irrespective of format, (i.e. both textual and electronic, including e-mails) created or received by ETB staff in the course of their duties on behalf of the ETB, are the property of the ETB and subject to its overall control. **Employees leaving the ETB or changing positions within the ETB must leave all records intact for their successors.**

4. 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 Data Protection Acts 1988 & 2003/The General Data Protection Regulation (GDPR) and supporting legislation**

The Data Protection Acts 1988 and 2003 cover information; kept in electronic systems or on computer; and, since October 2007, paper records, which relate to a living person. 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.

- **The Freedom of Information Act 2014**

In April 2014 ETBs became subject to the terms of the Freedom of Information Act 2014. The FOI Act provides the following statutory rights:

- the right to access records held by public bodies covered by the Act
- the right to have personal information in a record amended where such information is incomplete, incorrect or misleading
- the right to obtain reasons for decisions taken by public bodies affecting the person.

- **Education and Training Boards Act 2013**

- **Vocational Education Acts 1930 to 2001**

- **Education Act 1998**

- **Education Welfare Act 2000**

- **Comptroller and Auditor General Act 1993**

- **Department of Education and Skills Circular 0018/2015 Code of Practice for the Governance of Education and Training Boards**

- **ETBs Internal Audit Unit (formerly VSSU) Guidelines**

5. Management of ETB Records

5.1 All records created and received by ETB staff in the course of their duties on behalf of the ETB must be retained for as long as they are required to meet the legal, administrative, financial and operational requirements of the ETB, after which time they are either destroyed or transferred to the ETB Archives. The final disposition (either destruction or transfer to the Archives) of records is carried out according to CDETb's **Records Retention Schedule** and as outlined in the accompanying appendices.

5.2 While the **record retention schedules** prescribe the minimum period that ETB records must be retained, officers may, at their discretion, keep the records for a longer period of time if it is deemed necessary and appropriate.

- 5.3 The ETB administers a number of programmes funded by the European Union's European Regional Development. In addition, a number of programmes such as Adult Literacy, Youthreach and BTEI are co-funded by the EU and from time to time other programmes may be in receipt of EU funding. EU requirements stipulate that all records relating to such programmes for seven years e.g. documents relating to 2013 must be retained until 31st December 2020.

6. Responsibilities

- 6.1 The Chief Executive is responsible for the internal control of the ETB, an element of which must be the retention of records used in the decision-making process for key decisions in order to demonstrate best practice and the assessment of risk.
- 6.2 It is the responsibility of the individual members of staff 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, incinerated or otherwise disposed of to ensure that such information is not disclosed.
- 6.3 It is the responsibility of each Principal/Director/Co-ordinator/Head of Section to operationalise this policy and to designate and inform the appropriate responsible officers in the creating/receiving department/office/school/centre.
- 6.4 A disposal register must be created and maintained by each administrative department/school/institute/centre/programme.

7. Procedures

- 7.1 This policy should be read in conjunction with CDETb's Records Retention Schedule. The schedule was developed following consultation with representatives from the following areas:
- Second level
 - PLC
 - Youthreach
 - Adult Education
 - Psychological Service
 - Corporate Services
 - ETBI
- 7.2 The 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.

- 7.3 The schedules will be reviewed and amended as required on an ongoing basis.

8. Electronic/Digital Records

- 8.1 The same records management principles and policies applied to paper records must also govern the management of electronic/digital records. However, the technological nature of electronic/digital records requires that special consideration be given to matters such as authenticity, accessibility, version control, preservation and disposal.
- 8.2 Electronic/digital records should have the same retention schedules as their paper counterparts.
- 8.3 In the absence of any electronic records management systems, staff should be encouraged to employ good housekeeping practices in the management of electronic/digital documents, i.e. employ a naming convention, have a back-up schedule, delete regularly (especially e-mails), use passwords as appropriate, produce paper copies if required to maintain the integrity of manual files, etc.
- 8.4 In the case of electronic records stored in file servers or data stored in relational databases where the computer equipment is maintained by the IT Systems Administrator, the department which created or maintains these records must formally agree back-up and recovery procedures with the IT Systems Administrator. 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.

9. Implementation

This policy will be implemented by the Chief Executive, however the responsibility for day to day implementation will lie with individual members of staff in the exercise of their duties.

10. Review

This policy will be reviewed periodically by the Chief Executive and Directors/Senior Administrative Staff/Principals/Co-ordinators and revised if necessary in light of legislative and operational changes.

Appendix A

Definitions

ETB Records:

Records created or received by ETB staff in the course of their duties on behalf of the ETB, 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 school/institute/centre/programme or administrative office of the ETB in connection with the transaction of ETB business and retained by such office as evidence of the activities of the ETB or because of the information contained therein.

Current Records:

Active Records:

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

Semi-active Records:

Semi-active records are records that are referred to infrequently and are not required constantly for current use. Semi-active records are removed from office space to storage until they are no longer needed.

Non-Current Records:

Inactive Records:

Inactive records are records which are no longer required to carry out the functions for which they were created. They should be stored until the retention period has lapsed.

Permanently Valuable Records – Archives:

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

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 or to be scanned for electronic storage.

Records Retention Schedule:

A Records Retention Schedule is a control document that describes the ETB's records at a series level and indicates the length of time each series shall be retained prior to final disposition; the rationale for retention 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 under a policy as decided by the ETB or transfer to archival storage for selective or full retention.

Records Series:

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

Appendix B

Records Management – Guidelines for Staff

Why do we keep Records?

Records are created to support and enable the ETB to conduct the business process, to ensure accountability, to fulfil its legal obligations and to ensure the continuous operation of the ETB in the event of a disaster. As such they have administrative, evidential, legal and fiscal value. Further, with regard to legislation most notably the Data Protection Acts 1988 and 2003 and the Freedom of Information Act 1997 and 2003 (when extended to ETBs), the ETB is obliged to keep up-to-date records and efficient means of accessing them to fulfil its legal commitments.

Areas of particular concern in the context of Data Protection and 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 Data Protection and 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 or stored off site with easy access.
3. Disposition - Records should either be archived or disposed of.

Retention and Disposal

The ETB's Records Retention Schedules detail records held within the ETB. This will be implemented at Departmental/School/Centre level and reviewed on an annual basis. It is the responsibility of the Principal/Director/Co-ordinator/Head of Section 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 Destruction Record needs to be completed by the employee and countersigned by the senior member of staff responsible for records destruction. The Destruction Record should be filed and kept permanently.

The benefits of using records schedules are as follows:

- Ensures that important records are organised and maintained in such a way as to be easily retrieved and identifiable as evidence of activities especially in the event of an audit, a Data Protection or Freedom of Information request or discovery in the event of 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 are well organised.

Vital Records

A list of the vital records held within the ETB should be drawn up. Board/Committee meetings, Sub-committee meetings, Board of Management 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

Overall responsibilities as an organisation

Responsibilities at ETB 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 ETB. the ETB systems are also designed to protect the legal and financial rights of those directly affected by the ETBs activities.

Employee responsibilities

This policy will impact on all areas of 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 are responsible for making and keeping the records of their work and should:

- Create records needed to do the business of the ETB, 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 and returned when necessary.
- Carry out the disposition of records, which are under their control in accordance with the ETB's records retention schedule.

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, unless justified.
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. If, for example, records are scheduled for destruction after three years, don't store them for five years.
6. In general, records received from ETB schools/institutes/centres/offices should be filed under the name of the originating school/institute/centre/office.
7. Some records may 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.
8. Label and date all files.
9. Color-coding the different series is a useful tool, especially for refiling folders.
10. Create a file guide with a description of the 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.
11. Create cross-listings to help locate items. Create a file database on the PC using the file-folder heading, cross-listing, and location notes.
12. Spell out acronyms and abbreviations.
13. Sort records prior to filing.
14. Use staples rather than paper clips in folders.

- 15.** Discard envelopes if the return address is available on the document itself. Most phone messages, illegible notes, and routine acknowledgements can also be discarded.
- 16.** Do not overfill file folders. If they are overfilled, divide them into several folders with the same name and File number (e.g.: Maternity Leave Applications 2008/2009, File 1).
- 17.** Do not overstuff file drawers. This can make retrieval of files difficult, as well as creating a dangerous work environment.
- 18.** Weed files regularly, using established retention schedules.
- 19.** Consider using "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.

Appendix D

Data Destruction Certificate (IT Equipment)	
Equipment type	
Brand	
ID/Product number	
Location	
Type of data	
Reason for data destruction	
Method used for wiping	
No of passes	
Date of wiping	
Verified by	
Date	

Record of destruction of data by confidential shredding	
Brief description of data	
Contains personal data (Yes/No)	
Date(s) of document/file	
Other relevant details (e.g. name of person/company assigned/engaged to shred documents)	
Date of destruction	
Initialled	