

	<b>Records Management &amp; Retention Policy</b>	QF 791	Issue No. 01
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# Records Management & Retention Policy



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1	10/07/2020	Vicky Nolan	Initial Release

## **Purpose**

Barrow Consultancy and Training Ltd. (hereafter Barrow Training) is committed to the proper and effective management of the records and data it creates, receives, captures, maintains, or otherwise processes, in all formats, in the course of its operations, academic and administrative, in a manner which:

- is transparent, consistent, and accountable
- meets legal, regulatory, and audit requirements
- supports the efficient conduct of its business
- protects the security and integrity of Records and Data, including Personal Data
- ensures the preservation of Archives documenting its history and development

Barrow Training recognises that records management is a collaborative process, which calls for the support and active participation of management and staff at all stages, including design, implementation, compliance, and review. Engagement is essential to achieving the purposes of this Policy.

It is acknowledged that the greater part of Barrow Training's records is now held in digital formats, including records comprised of data within digital systems. Barrow Training commits itself to ensuring its record systems, for both digital and hard copy records, support records management processes and the purposes of this Policy.

Particular recognition is given to Barrow Training's obligations as a data controller and processor towards data subjects under Barrow Training's Data Protection Policy and Data Protection legislation, and to the special and limited derogations given under that legislation for processing data for research and statistical purposes, and for archival purposes in the public interest.

## **Scope**

This Policy applies to all records, in all formats, created, received, maintained, or otherwise processed in the course of the activities of Barrow Training including, without limitation, hard copy and digital records. Personal records unrelated to Barrow Training activities are not within the scope of this policy. Staff are advised to avoid maintaining such records within Barrow Training systems (e.g., email servers, network folders), as doing so may place them within the scope of legislation such as Freedom of Information.

## **Records Management**

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

Records Management includes, but is not limited to, records classification; management of filing systems, retention scheduling; the administration of inactive records storage; management of record conversion programmes; disaster planning; vital records protection; archival preservation activities and appropriate destruction of records.

## **Ownership of Records**

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

## **Responsibilities of Barrow Training Employees**

This policy applies to all areas and locations of Barrow Training and includes all departments and areas of work which form part of Barrow Training structure.

Operational responsibility for the implementation of this policy rests with the Manager in each Academic/Administrative area.

Where records are used by more than one department, clarity about which department has primary/final responsibility for management of the records should be established between the relevant department

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.

Once records have been retained by the creating department (in situ or offsite storage) 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.

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.

In the case of in-house destruction, the department/office/unit should document and retain the date and manner of destruction of records. In the case of third-party destruction, a certificate or docket confirming destruction should be received and retained as proof of destruction.

## **Definitions**

### *Record*

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 Barrow Training.

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 electronic 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)."

### *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.

### *Records Classification*

The procedure where records are identified and categorised for filing on the basis of their subject and are assigned a file name for efficient retrieval.

### *Active Record*

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 Record*

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

### *Inactive Record*

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.

### *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 Barrow Training.

## *Records Retention Schedules*

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

## **Forms of Records**

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, 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

## **Electronic Records**

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

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

In the case of electronic records where the computer equipment is maintained by a local external IT Support company – Business IT Solutions (BITS), Barrow Training must formally agree backup and recovery procedures with BITS. 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.

Where electronic records are kept on systems not maintained by BITS, a formal inventory of such records must be maintained by the head of academic/administrative area.

## **Management and Retention of Records**

Records should be retained for as long as they are required to meet the legal, administrative, financial, and operational requirements of Barrow Training 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.

Barrow Training records must be sorted and filed on a basis that ensures efficient retrieval.

Appropriate filing/archiving or destruction of records is to be carried out in accordance with the attached retention schedule.

The retention schedule is based on a determination of legal retention requirements as defined in relevant legislation (Health, Safety and Welfare at Work Acts 2001 & 2005; Freedom of Information Act 2014; General Data Protection Regulation (GDPR) and Data Protection Acts 1988-2018 etc.) as well as Barrow Training policies and procedures, administrative and operational requirements, historical value and general best practice.

## **Record Retention Schedule**

The attached records retention schedule prescribes the retention period for a range of records held by Barrow Training.

Any department which considers that records should be retained for a longer period than that set down in Barrow Training retention schedule is required to consult with 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 GDPR and the Data Protection Acts (1988-2018).

## Barrow Training Records Retention Schedule

### Governance and Administration Records

<b>General classes of records held by Barrow Training departments</b>	<b>Default retention period</b>	<b>Final disposition</b>
Business Development Plans	Retain indefinitely	Appropriate filing/archiving
Management System Procedures	Retain current until superseded	Appropriate filing/archiving
Business Operating Procedures	Retain current until superseded	Appropriate filing/archiving
Quality Assurance Policies and Procedures	Retain current until superseded	Appropriate filing/archiving
Records of Board of Management, Quality Assurance Committee and Programme Development Committee Meetings e.g. agenda, minutes, documents relating to agenda items, voting records	Retain indefinitely	Appropriate filing/archiving
Records of Team Meetings which may contain learner details	Retain for 7 years after actions completed	Confidential shredding/secure deletion of electronic records
Risk Register	Retain for 7 years after superseded	Confidential shredding/secure deletion of electronic records
Organisational Structure	Retain current until superseded	Appropriate filing/archiving
Circulars, memos re policy matters	Retain until policy to which they relate is superseded	Appropriate filing/archiving
Projections and statistical analyses	Retain for 7 years	Confidential shredding/secure deletion of electronic records
General (non-HR) written Allegations/Complaints: records received/created as a result of investigating allegations/complaints	Retain for 7 years after resolution of complaint or from date of last correspondence	Confidential shredding/secure deletion of electronic records
General (non-HR) written Allegations / Complaints: records received/created as a result of investigating allegations/complaints - significant cases which set precedents or result in changes to Barrow Training policy	Retain indefinitely	Appropriate filing/archiving
Handwritten notes taken by recording secretary present at meetings	Retain until minutes have been agreed	Confidential shredding

<b>General classes of records held by Barrow Training departments</b>	<b>Default retention period</b>	<b>Final disposition</b>
Routine administration records	Retain for current year, or until they cease to be of administrative use	Appraise and evaluate for archiving where relevant. Otherwise, confidential shredding/secure deletion of electronic records
General correspondence, including emails <i>(Where content of an email and/or its attachment(s) fall under another specific class of record in this Records Retention Schedule, it should be handled, retained, and disposed of appropriately as set out in in the relevant section of the Schedule)</i>	Retain for current year, or until they cease to be of administrative use	Appraise and evaluate for archiving where relevant. Otherwise, confidential shredding/secure deletion of electronic records
ISO, QOI and PHECC Audit Reports	Retain indefinitely	Appropriate filing/archiving
Quality Assurance Manual, Quality Reports, Quality Assurance Peer Reviews	Retain until superseded	Appropriate filing/archiving
Training schedules	Retain until superseded	Appropriate filing/archiving
External liaison – e.g. correspondence with accreditation bodies	Retain indefinitely	Appropriate filing/archiving
Records of awards	Retain indefinitely	Appropriate filing/archiving
Legal cases, advice, and any correspondence	Retain indefinitely	Appropriate filing/archiving
Copyright records/trademark registrations	Retain indefinitely	Appropriate filing/archiving



## Barrow Training Records Retention Schedule

### Academic and Learner Records

<b>General classes of records held by Barrow Training departments</b>	<b>Default retention period</b>	<b>Final disposition</b>
Programme development/accreditation records and reports	Retain indefinitely	Appropriate filing/archiving
Re-engagement records and reports	Retain indefinitely	Appropriate filing/archiving
Learner enrolment record including name and contact details	Retain indefinitely	Appropriate filing/archiving
Learner records including: Personal information, e.g. date of birth, PPSN; fees/payment records; extenuating circumstances forms; requests for extensions; transfer; exemptions; reasonable accommodation	Retain for duration of studies plus 1 year	Confidential shredding/secure deletion of electronic records
Correspondence with learners	Retain for duration of studies plus 1 year	Confidential shredding/secure deletion of electronic records
Learner discipline records	Retain for duration of studies plus 7 years	Confidential shredding/secure deletion of electronic records
Garda Vetting records	Retain for duration of studies plus 1 year	Confidential shredding/secure deletion of electronic records
Examination papers (and related records i.e. recommended marking scheme, sample answers, where relevant)	Retain indefinitely	Appropriate filing/archiving
Records which contribute towards module grade and which have not been returned to learners: e.g. examination scripts, assignments, projects, portfolios, skills demonstrations video/photographic evidence and written reflections, learner records	Retain for 1 month following deadline for appeal	Confidential shredding/secure deletion of electronic records
Assessments which undergo appeals procedure	Retain for 2 years after action completed	Confidential shredding/secure deletion of electronic records
Internal verification reports	Retain for 7 years	Confidential shredding/secure deletion of electronic records
External authentication reports and all correspondence	Retain for 7 years	Confidential shredding/secure deletion of electronic records
Results approval panel meeting minutes	Retain for 7 years	Confidential shredding/secure deletion of electronic records
Tutor monitoring reports	Retain for 7 years	Confidential shredding/secure deletion of electronic records

<b>General classes of records held by Barrow Training departments</b>	<b>Default retention period</b>	<b>Final disposition</b>
Cross-moderation reports	Retain for 7 years	Confidential shredding/secure deletion of electronic records
Records of module grades	Retain indefinitely	Appropriate filing/archiving
Amendment to marks, published results/grade alteration correspondence	Retain indefinitely	Appropriate filing/archiving
Learner academic transcript	Retain indefinitely	Appropriate filing/archiving

## Barrow Training Records Retention Schedule

### Finance Records

<b>General classes of records held by Barrow Training departments</b>	<b>Default retention period</b>	<b>Final disposition</b>
Accounts payable – batches of invoices; tax clearance certificates	Retain for current year plus 6 years	Confidential shredding/secure deletion of electronic records
Accounts receivable – debtors ledgers; income listings; income control accounts; receipts reconciliation	Retain for current year plus 6 years	Confidential shredding/secure deletion of electronic records
Bank records – paid cheques; bank reconciliation; bank statements	Retain for current year plus 6 years	Confidential shredding/secure deletion of electronic records
Financial statements – annual financial statements; final budget reports	Retain indefinitely in original form	Appropriate filing/archiving
Asset register	Retain indefinitely in original form	Appropriate filing/archiving
Agreements – Rental; Lease; Use; Occupancy	Retain indefinitely	Appropriate filing/archiving
Audit reports/records	Retain indefinitely in original form	Appropriate filing/archiving
Internal financial policies, accounting standards, procedures	Retain until superseded	Confidential shredding/secure deletion of electronic records
Expenses/Travel claims forms, all supporting receipts	Retain for current year plus 6 years	Confidential shredding/secure deletion of electronic records
Credit card statements	Retain for current year plus 6 years	Confidential shredding/secure deletion of electronic records
Stripe proof of payment	Retain for current year plus 6 years	Confidential shredding/secure deletion of electronic records
Customer payment information, e.g. debit card details	Destroy immediately	Not recorded or stored
Cancelled cheques	Retain for current year plus 6 years	Confidential shredding/secure deletion of electronic records
Receipt books	Retain for current year plus 6 years	Confidential shredding/secure deletion of electronic records
General correspondence	Retain for current year, or until they have ceased to be of administrative use	Appraise and evaluate for archiving where relevant. Otherwise, confidential shredding/secure deletion of electronic records

General classes of records held by Barrow Training departments	Default retention period	Final disposition
Contracts for services	Following completion of contract, retain for current year plus 6 years	Appraise and evaluate for archiving where relevant. Otherwise, confidential shredding/secure deletion of electronic records
Employee pension information	Retain indefinitely	Appropriate filing/archiving
Payroll – Pay-sheets, authorisations to deduct tax details of staff, appointment details, payslips	Retain on personnel file for duration of employment and for 5 years after last pension payment	Confidential shredding/secure deletion of electronic records

## Barrow Training Records Retention Schedule

### Human Resources Records

<b>General classes of records held by Barrow Training departments</b>	<b>Default retention period</b>	<b>Final disposition</b>
Recruitment - Vacancy notification, Advertisement copies, Job description, Selection criteria	Retain indefinitely	Appropriate filing/archiving
Applications and CVs of candidates not qualified or short listed for interview; Applications and CVs of candidates shortlisted for interview but who do not attend; Applications and CVs of candidates shortlisted and who attended interview but who are not successful or who are successful but do not accept offer	Retain until review period has passed, final appointment has been approved plus 2 years	Confidential shredding/secure deletion of electronic records
Interview Board marking sheet, Interview Board notes, and recommendation by Interview Board	Retain until review period has passed, final appointment has been approved plus 2 years	Confidential shredding/secure deletion of electronic records
Personnel Files - May include such records as: Personal contact details Application form/CV/cover letter Contract of employment (Offer of appointment, Date appointed) Evidence of education qualifications References Questionnaire on Criminal Offences Probation forms Salary Service Records Completion of mandatory training (where relevant) Termination notices Training and development records Safety Training Records  Leave records relating to: Sick Leave, Shorter-working year/Term-time, Job-share scheme, Part-time Working records, Parental leave, Adoptive Leave, Maternity Leave, Force Majeure, Jury Leave, Bereavement Leave	Retain on personnel file for duration of employment plus two years	Confidential shredding/secure deletion of electronic records
Annual Leave	Retain for 7 years	Confidential shredding/secure deletion of electronic records

<b>General classes of records held by Barrow Training departments</b>	<b>Default retention period</b>	<b>Final disposition</b>
Discipline records - Records relating to disciplinary actions taken against employees e.g. warnings, suspensions recorded, or copy warnings placed on an employee's personnel record etc.	Retain for 7 years	Confidential shredding/secure deletion of electronic records
HR Allegations and Complaints – Written Allegations/Complaints: records received/created as a result of investigating allegations/complaints	Retain for 7 years	Confidential shredding/secure deletion of electronic records
Written Allegations and Complaints: records received/created as a result of investigating allegations/complaints – significant cases which set precedents or result in changes to Barrow Training policy	Retain indefinitely	Appropriate filing/archiving
Safety policies	Retain until superseded	Confidential shredding/secure deletion of electronic records
Safety Training Records	Retain on personnel file for duration of employment plus 2 years	Confidential shredding/secure deletion of electronic records
Risk Assessments Records	Retain for 7 years after superseded or after activity ceases, whichever relevant	Confidential shredding/secure deletion of electronic records
Incident Reports	Retain for 7 years after date of incident	Confidential shredding/secure deletion of electronic records
Safety audits, investigations, and safety evaluation records where cases result in significant changes to policy	Retain indefinitely	Appropriate filing/archiving
Third Party recommendations e.g. Labour Court, Equality Tribunal, Labour Relations Commissions etc.	Retain indefinitely	Appropriate filing/archiving
Individual industrial relations issues	Retain indefinitely	Appropriate filing/archiving
Claims records (e.g. correspondence, status records etc.)	Retain indefinitely	Appropriate filing/archiving

## Barrow Training Records Retention Schedule

### Other Records

<b>General classes of records held by Barrow Training departments</b>	<b>Default retention period</b>	<b>Final disposition</b>
Data submitted for the purpose of a course enquiry	Retain until enquiry has been responded to, and one-week follow up contact made	Confidential shredding/secure deletion of electronic records
Data submitted for the purpose of a competition entry	Retain until competition closing date has passed and winner has been notified	Confidential shredding/secure deletion of electronic records
<b>BUILDING</b>		
Maintenance records (buildings, structures, grounds)	Retain for 7 years following completion	Confidential shredding/secure deletion of electronic records
Records pertaining to security operations, lists of keys issued, office space	Retain until superseded	Confidential shredding/secure deletion of electronic records
Inspection Records (equipment etc)	Retain for 7 years from date of inspection	Confidential shredding/secure deletion of electronic records
<b>INSURANCE</b>		
Insurance Policies	Retain for 7 years	Confidential shredding/secure deletion of electronic records
Claims correspondence and records of providing legal support & representation in dealing with claims by or against Barrow Training which do not proceed to litigation or settlement by an agreement	Retain for 7 years following settlement or withdrawal of claim	Confidential shredding/secure deletion of electronic records
Claims correspondence and records of litigation with third parties	Retain indefinitely	Appropriate filing/archiving
<b>COMPLIANCE</b>		
Freedom of Information/Data Protection: decisions on requests	Retain indefinitely	Appropriate filing/archiving
Freedom of Information/Data Protection: other records relating to requests	Retain for 7 years after final action completed	Confidential shredding/secure deletion of electronic records