Policy Title:	Records Management Policy
Description:	This document provides information on matters relating to Marino Institute of Education's document and record management
Author (Position):	Data Protection Officer (DPO)
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Records Management Policy

1. Context

Marino Institute of Education (MIE) records comprise a valuable source of knowledge as to how and why decisions are taken.

Given that good quality records are of value to any organisation, their effective management is necessary to ensure that the records retained:

i. are authentic, reliable and complete;

ii. are protected and preserved as evidence to support future actions;

iii. ensure current and future accountability.

2. Purpose

The purpose of this Records Management Policy is to ensure that records are used to support the Institute's functions and activities and to ensure accountability for as long as is required.

The objectives of this policy are to:

i. Support records management in the Institute

ii. Support the Institute's administrative and operational requirements, including adherence to the Institute policies and compliance with relevant legislation

iii. Ensure the preservation of permanently valuable records

iv. Promote day-to-day efficiency and good records management

v. Ensure timely destruction of records that no longer need to be retained

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

3. Benefits

The Records Management Policy outlines how the Institute maintains complete, relevant, organised and accurate records to fulfil its mission and to ensure its smooth and efficient operation in compliance with relevant legislation. The policy guides decision making in relation to data collection and retention and destruction of records. The policy promotes the management of data in a consistent and transparent way providing reassurance for those involved in handling records.

4. Principles

4.1. The Institute collects the minimum amount of data needed to complete its mission and to comply with relevant legislation.

4.2. Records are stored securely and are accessible only to those who directly require such access to provide relevant services to students, staff and other stakeholders.

4.3. Records are retained for specified purposes and contain only the minimum necessary sensitive personal information.

4.4. The MIE Records Retention Schedule outlines the general class of records held, the default retention period and how these records are destroyed after the retention period expires.

4.5. The institute seeks to comply with European Union and Irish legislation relating to data protection[1].

5. Definitions

5.1. For the purposes of this policy, a record is defined as recorded information, in any form, created or received and maintained by the Institute in the course of its official business.

5.2. Permanently valuable records are defined as records with permanent legal, operational, administrative, historical, scientific, cultural or social significance. permanently valuable records are subject to permanent archiving procedures. Records occur in all types of recording media, including;

i. Paper documents (written or printed matter)

ii. Electronic records (e.g. work processing files, databases, spreadsheet files, emails, CCTV footage[2], electronic data on any media etc.);

iii. Books, drawings and photographs;

iv. Anything on which information is recorded or stored by graphic, electronic or mechanical means.

[1] See Data Protection Policy

[2] See The Library of MIE Data Protection Statement and CCTV Policy

5.3. Records must be retained for as long as required to meet the legal, administrative, financial, operational or historic needs of the Institute. Record series are groups of related records, which are created and used with a common purpose, for example, financial records, personnel records, examination results, committee minutes, etc.

5.4. A MIE Records Retention Schedule is a control document that describes the Institute's corporate records at a series level, and

i. Specifies the length of time each record series should be retained prior to final disposition

ii. Specifies the final disposition route of each record service

iii. Serves as the legal authorisation for the disposition of records.

5.5. Disposition is the action taken in regard to the disposal of active records, which can involve physical destruction by means of

i. security shredding or recycling

ii. transfer to archival storage for selective or full retention, or

iii. special disposition through a formal act of alienation from the custody of the Institute.

6. Policy

6.1. Ownership of Records

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

6.2. Responsibility of Institute Employees

This policy applies to all areas and locations of the Institute and all areas of work which form part of the Institute structure. Operational responsibility for the implementation of this policy rests with the Head of each Academic/Administrative department.

Where records are used by more than one area/department, clarity about which office has primary/final responsibility for the management of the records should be established between the relevant departments. Where records are jointly created with other organisations, those sharing ownership should agree how records are to be stored, managed and final disposition. In such instances where MIE is deemed to have record management responsibility, employees are obliged to follow this policy.

6.3. Records Classification

It is the responsibility of the data owner to classify all records.

Institute records must be identified and categorised for filing on the basis of their subject, and assigned a file name that allows for efficient retrieval.

i. *Active records* are records which are required and referred to regularly for current use, and should be retained and maintained in office space and equipment which is readily accessible to users.

ii. *Semi-active records* are records which are referred to infrequently and are not required regularly for current use. Semi-active records can be removed from the office space to off-site storage unit until they are no longer needed.

iii. *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. Inactive records can be disposed of/archived as per the MIE Records Retention Schedule.

6.4. Management of filing systems

Staff must employ the following good housekeeping practices in the management or records:

i. Systematic indexing/classification of records

ii. Sensible and consistent naming of files and folders

iii. Backup of appropriate files on a regular basis

iv. Review records regularly and delete records regularly in accordance with the MIE Records Retention Schedule

v. Restrict access to record systems (use of passwords, time lock out of PC's, locked cabinets etc.)

vi. Particularly sensitive records transferred to external bodies should be appropriately secured.

vii. Produce paper copies if required to maintain the integrity of manual files, etc.

Where electronic records are stored in computer equipment maintained by the Institute's IT department, the office which creates/maintains these records must formally agree backup and recovery procedures with 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. Overall responsibility for ensuring back-up and recovery systems are in place rest with either the Director of Information and Communications Technology or the relevant Department head.

Where electronic records are kept on systems not maintained by IT Services, a formal inventory of such records must be maintained by the department head of an area. The academic/administrative area which creates/maintains these records must document and implement backup and recovery procedures for these records.

6.5. Retention Scheduling

Records should be retained for as long as they are required to meet the legal, administrative, financial and operational requirements of the Institute during which time, they should be filed appropriately. Following a period of time, as set out in the MIE Records Retention Schedule, they are either archived or disposed of.

The MIE Records Retention Schedule prescribes the retention period for a range of records held by the Institute

The MIE Records Retention Schedule is based on a determination of legal retention requirements as defined in relevant legislation including the Universities Act, 1997; Health, Safety and Welfare at Work Acts, 2005; the Data Protection Act, 1988, Data Protection Act, 2008 and Data Protection Legislation, 2018; as well as Institute instruments, policies and procedures, administrative and operational requirements, historical value and general best practice[3]. The schedule will be reviewed and updated on a yearly basis to reflect organisational or operational changes as appropriate.

[3] See Data Protection Policy and MIE Privacy Policy

Records containing personal information should be stored in accordance with the Institute's Data Protection Policy and in line with national and European Data Protection legislation (see Information Compliance Webpage for further information). Any function which considers that such records should be retained for a longer period than that set down in the MIE Records Retention Schedule is required to consult the Leadership Team:

i. To ensure that reasonable justification exists for their retention

ii. To ensure compliance with the Data Protection Act, 1988, Data Protection Act, 2008 and Data Protection Legislation, 2018

6.6. Permanent Archiving

i. Records, including Inactive Records, that have been identified as permanently valuable records are subject to archiving procedures. In nearly all cases these records should be eventually transferred to the Institute Archives

ii. Archiving of records is to be carried out in accordance with the MIE Records Retention Schedule.

6.7. Appropriate Destruction of Records

i. When scheduled for destruction, the manner of the destruction of records must be appropriate to the level of confidentiality of the records.

ii. In the case of third-party destruction, a certificate or docket confirming destruction must be received and retained as proof of destruction.

iii. Destruction of records is to be carried out in accordance with the MIE Records Retention Schedule.

7. Responsibility

7.1. This policy applies to all areas and locations of the Institute and all areas of work which form part of the Institute structure.

7.2. Operational responsibility for the implementation of this policy rests with the Head of each Academic/Administrative department

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

7.4. Where records are jointly created with other organisations, those sharing ownership should agree how records are to be stored, managed and final disposition. In such instances where MIE is deemed to have record management responsibility, employees are obliged to follow this policy.

8. Related Documents

This policy should be read in conjunction with the

8.1. MIE Records Retention Schedule

8.2. MIE Privacy Policy

8.3. Data Protection Policy

8.4. The Library of MIE Data Protection Statement and CCTV Policy