

IADT

Document Reference and Version No	Revision 3
Purpose	Records Management Policy
Commencement Date	May 2015
Date of Next Review	April 2018
Who needs to know about this document	President; Head of Creative Engagement; Secretary & Financial Controller; Heads of Faculty; Heads of Department; all administrative staff.
Revision History	New policy from May 2015
Policy Author	Angela Brennan, Freedom of Information /Peter Robertson, HoCE, DCIR.
Policy Owner	IADT Management Team

Introduction

The purpose of this revised and updated version of the Records Management Policy is intended to be of use to all staff who are responsible for record keeping or those who are reviewing existing record-keeping procedures within the Institute. It provides practical guidelines on record-keeping in accordance with best practice to which all staff are obliged to adhere. The function of the Policy is to promote the creation and maintenance of complete, authentic, reliable, accessible and accountable records.

This policy is applicable to all areas and locations of the Institute and includes all Faculties, Departments, and Directorates, and functional areas which form part of the Institute structure.

Guidelines: What is a Record?

Records are documents created, used and maintained for business reasons. They provide proof or evidence of business activities; they illustrate policies, decisions and precedents and the context in which they were made and they document compliance with statutory obligations.

The FOI Act gives a broad definition to the term "record" and includes information created, maintained and stored manually and/or electronically. Under the Act "record" includes:

".....any memorandum, book, plan, map, drawing, diagram, pictorial or graphic work or other document, any photograph, film or recording (whether of sound or images or both), any form in which data (within the meaning of the Data Protection Act 1988) are held, any other form (including machine-readable form) or thing in which information is held or stored manually, mechanically or electronically and anything that is a part or a copy, in any form, of any of the foregoing or is a combination of two or more of the foregoing."

It follows therefore that a verbal conversation is not a record unless it is recorded i.e. voicemail.

Guidelines: What is Records Management?

Records management is the organisational function of managing records to meet operational business needs and accountability requirements. It tracks and controls documents from creation to disposal so that they can be moved as efficiently and speedily as possible through administration. It also serves to identify vital records, those that are necessary to the organisation's ability to continue its business and to protect its financial and legal interests. The identification and protection of such records is therefore of critical importance.

When the business function to which the records relate declines or ceases and they need no longer be readily available, they are transferred to an inactive or non-current storage facility for retention for a pre-determined period. When this retention period has ended, the records are destroyed according to agreed and documented procedures. A small proportion is preserved permanently because of ongoing administrative or historical value.

Guidelines: Office of Primary Responsibility

The Institute, Faculty, 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.

Guidelines: Ownership of records

In order for this Policy to be successful and effective it has to have organisation-wide support and commitment at every level. It is the responsibility of every employee to manage their own records effectively. For a full list of all classes of records please refer to the Institute's Records Management Schedule (Appendix A) which identifies records and the Departments/Functions responsible for them.

All records, irrespective of format, created or received by Institute officers or employees in the course of their duties on behalf of the Institute, are the property of the Institute and subject to its overall control.

Employees leaving IADT or changing positions within the Institute must leave all records for their successors.

Guidelines: Off-campus Storage Facility

IADT uses the facilities of an off-site storage company which has the capability to return a stored box within 24 hours.

Guidelines: 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. Active records should therefore not be sent for off-site storage.

Guidelines: Semi-active Records

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

Guidelines: Inactive records

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. They are stored off-site until their destruction.

Guidelines: Permanently valuable records – Archives

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

General advice on good practice

When creating a record you should be objective, factual and clear and you should avoid any material that is inappropriate to individuals or organisations as it may be necessary to reveal the record under the FOI Acts, which may ultimately lead to its disclosure to a wider unintended audience.

- Any opinions expressed should be adequately supported. Facts and opinions should be recorded distinctly.
- Earlier drafts, preparatory notes, etc., should not normally be retained. They may be destroyed only if they are not necessary to understand the final document.
- Adding the label “confidential” or similar does not in itself present disclosure of a record.
- In general, records should use language which is suitable to the subject matter and understandable to a reasonably informed appropriate external reader; jargon etc., should be avoided.
- Unnecessary, misleading, irrelevant or unsuitable records should not be created.

Comments on types of records

Diaries: A diary which is used in whole or in part for carrying out functions of the Institute is accessible under Freedom of Information Act 2014 (FOI). Where a business diary also contains personal information, the personal information may be withheld from release. It is desirable from an FOI perspective to keep official and personal diaries separately.

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

References: A reference provided by an individual in an organisation coming within the remit of the FOI Act in the course of his/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 and treated as confidential.

References given by Institute staff in the course of carrying out their Institute functions are accessible to the subject of the reference and should be written with good practice in mind.

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 should be placed onto a record-keeping system.

Minutes: When recording an item it is advisable to record all the necessary information and no more. Do not record every discussion as verbatim.

Record objective statements that explain concisely and accurately the subject under discussion, the decision taken and the desired action. Discussion should be recorded in a concise summary manner. Record a quotation only if the individual concerned expressly desires it.

Draft minutes/rough minutes/minute taker's notes should be destroyed once the final version has been approved.

Files: Any files created in the course of carrying out Institute duties may be accessible under FOI and should be written accordingly. There are no "private" files for Institute business. Files should be reviewed on an ongoing basis to ensure that redundant drafts, notes, etc., are removed. Files should be referenced appropriately to facilitate their retrieval in order to access information under any of the topics to which the file relates.

Notes, notebooks: Care should be taken when writing notes designed for one's own use. These too may be accessible under FOI. Subjectivity and conjecture should be avoided. Special care should be made if referring to third parties, particularly where views and opinions are concerned. Please remember that notes made regarding a consultation with an individual may be sought by that individual under their right of access to personal information. If notes are very rough but worthy of retention they should be written formally as the record.

"Post-its" and similar temporary or removal "records": These are records for the purposes of the FOI Acts, all be they insecure records. "Post-its" etc should not be used for purposes of recording information.

Records of reasons for decisions: The FOI Act require that a person who is affected by a decision of the Institute and has a material interest in the decision be given a written statement of the reasons for the decision and of any findings on any material issues of fact made for the purposes of the decision, if he or she requests them. When creating a record of a decision it is important to record the reasons for that decision. In general, the process should be that there is a written policy, procedure and criteria for the decision and those decisions are recorded against stated criteria citing the relevant evidence. The records should show a rational and consistent sequence. It is important that such records be created as close as possible to the time the decision was made.