



## **Records Management Policy**

### **Policy Statement for Multi Trades Training LTD (MTT)**

#### **The Freedom of Information Act 2000**

(FOIA) gives people the right to request information from public authorities. It is intended to promote a culture of openness and accountability amongst public sector bodies and therefore facilitate better public understanding of how the public authorities carry out their duties, why they make the decisions they do, and how they spend public money. The FOIA enables people access to information which is held by/on behalf of public bodies.

MTT is dedicated to ensuring compliance of the FOIA through effective implementation of the Records Management and Retention Policy. As a result, MTT will ensure that Information generated and received in the course of business is managed in an effective and secure manner.

Information is made available to the public in response to specific requests in accordance and within FOIA timescales. The successful implementation of the FOIA and the Centre's ability to respond to requests within the tight timescale allowed under the Act will depend greatly on the adherence to and effectiveness of the Records Management System. The Centre is committed to ensuring that access to records is achieved, demonstrating that its business activities have been conducted in compliance with appropriate regulations and internal standards. This will be evident through the creation and management of authentic, reliable, complete and usable records, capable of supporting the Centre's functions and activities.

Good records management is of special significance in the context of the Centre's function, where the maintenance of academic records is a core activity.

#### **IMPLEMENTATION**

**MTT** will endeavour to ensure:

- That all records have regulatory, statutory or business value.
- That records are captured, stored and protected against damage, loss or unauthorised access.
- Efficiently retrieved to requests received from the Public. Pr
- Preserved in such a way as to ensure their ongoing retrievability and readability.
- Retained for periods of time consistent with regulatory, statutory and legal requirements.



Records that are no longer needed are disposed of in a timely fashion and useless records not created or kept.

In addition to these legislative requirements, the Centre is committed to maximising the utilisation of its resources (i.e. staff, equipment and facilities) and ensuring 'openness and transparency' in the decision making process.

### **STAGES OF RECORDS - 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.

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

### **Inactive Records**

Inactive records are records that are no longer required to carry out the functions for which they were originally created.

### **Permanently Valuable Records – Archives**

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

### **Records Series/Classes Groups of Related Records**

Are created and used with a common purpose, for example, financial records; personnel records; student records; registry; examination results; committee minutes etc.

### **Record Retention Schedules**

A Records Retention Schedule is a control document that describes the Centre's corporate records at a series level (see above) and indicates the length of time each series shall be retained as active before transfer to the semi-active storage; the length of time each series should be retained as semi-active prior to final disposition; 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 or recycling; transfer to archival storage for selective or full retention; or a special disposition through a formal act of transfer from the custody of the Centre Areas of Primary Responsibility



**The Centre**

The registered office is responsible for retaining the Centre's "official" copy of a record. For example, the Registrar's Office is the office of primary responsibility for student's records; and are responsible for maintaining personnel and employment records.

## **FREEDOM OF INFORMATION ACT 2000 IN RELATION TO RECORDS MANAGEMENT**

Under the Freedom of Information Act, 2000 a record includes any memorandum, text or other document, any photograph, film or recording, or any form in which data are held (whether manual, mechanical or electronic), and anything that is part, or a copy, or a combination of the foregoing.

Your personal notes scribbled on a page form a record; even yellow post-it stickers could count as a record. If a document has been photocopied, only one record exists. However, if additions/amendments have been made to a copy, another record may exist.

Existing records may not be deleted or amended.

Corrections of typographical errors, factual mistakes and mere rephrasing do not necessitate holding previous editions of a document. This does not constitute destruction or alteration of a record. However, draft editions of a document (e.g. of a policy) are records – they document the decision-making process and, under the Act, a member of the public is entitled to this information if they so request. Documents created, received and used by the Centre are official records because their content show how and why decisions were taken.

All emails and voicemails are Centre records not private records. They can be retrieved in the collection of records for scheduling by a Decision Maker. Please see ICT Acceptable Use Policy. Private emails (i.e. correspondence by staff members of a private nature not connected with the official business of a Department) have no record status.

If a piece of artwork in the Centre has been paid for by public money it is a record.

While the following documents are "Records" as defined by the F.O.I. Act, it should be agreed that Centre Policy determine that they are destroyed within 24 hours and as such are not available for release under FOI request:

- Unsolicited Advertising/Promotional Material Product Brochures/Catalogues
- Unsolicited emails Trade publications by companies or public bodies
- Personal emails (not relating to Centre activities)

Outline of records kept by MTT Record systems at the registered address include paper Files, Electronic Document Management Images, Computer Generated Reports (Printouts), and other

Electronic Media including Computer Disk and Tape where information is stored in a variety of formats (WP Documents, Spreadsheets, Databases, HTML etc). The status of documents as records in these systems will be determined in accordance with this policy. Draft Documents/Working Papers These items constitute a record if they:

- Evaluate policy options or alternatives.
- Were drafted for official purposes, (e.g. appraisal, approval, comment etc).
- Contain relevant information, such as substantive annotations, agreements or comments, which add to the clear understanding of the formulation and execution of Centre policies, decisions, responsibilities or actions.
- Contain material not yet transcribed into more formal documents (notes taken at meetings, notes of a phone call etc). Once transcribed this material can be destroyed.
- Draft documents can be incomplete, complete or final. Complete and final drafts constitute records of the Centre while incomplete drafts would generally not be considered records.

### **Support/Background Documents**

Support Documents (Annotated copies complete drafts, working papers, policy options, studies, memoranda, correspondence that supports policy developments etc) must be retained on file where they are:

1. Needed to document and understand the evaluation of policy options, including rejected options.
2. Needed to understand the basis for deciding specific policy choices and courses of action.
3. Needed to supplement information in other records. (Technical documentation, drawings, calendars, calculations etc).

Minutes of Meetings Hand-written manuscript can be destroyed when the Minutes have been typed and approved. A mere recording of decisions of a meeting does not give the flavour of the discussion which led to a decision; therefore, in this case, the manuscript record must not be destroyed.

Recording minutes – do not record every discussion as verbatim. Record objective statements that explain concisely and accurately the subject discussed the decision taken and the desired action. Record a quotation only if the individual concerned expressly desires it.

Rough minutes – destroy rough minutes once the final version has been prepared.



## **Diaries**

A diary is a record and accessible under FOI. Where a business diary also contains personal information being blacked out before release will protect this. It is best to keep personal and business appointments in separate diaries.

## **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 must be taken into a record-keeping system.

## **Computer Database Records**

Computer-Generated Reports, Spreadsheets Records held on computer databases and spreadsheets will be accessible under F.O.I. Similarly computer generated reports will also be accessible and all such reports should be examined to determine if they achieve the status of a record.

## **Contractor Records**

Records created by contractors, consultants or outside agencies performing functions on behalf of the Centre may be needed to support the adequacy of Centre records. Contract provisions should explicitly define the documentation to be created and maintained by the contractor.

## **Departments/Sections**

Should also make clear in contracts any information that may be discoverable under the provisions of the Freedom of Information Act, 1997 and for how long such information should be retained by the contractor. Access to such records is provided for in Section 6 (9) of the F.O.I Act, 1997.

## **Post It Notes and Stickers**

“Post It” notes should not be left permanently on files. In the event of information on “Post It” notes being classified as a record the information should be transcribed to a standard paper note or the “Post It” Note photocopied and then stored on the file.

## **Architectural, Micro file, Photographic, Audio-visual, Multimedia, Technical Records**

While these information storage mediums will, in normal circumstances, hold record status it may not be practical to store them on official files. Such information should be stored in appropriate environmental conditions with the official file containing a cross-reference to such records identifying its location etc.



### **Legal Cases**

All documents relating to legal issues are maintained for the duration of a legal case even if they would have been destroyed earlier.

### **Personal Files**

All personal files, other than those with timed release/destruction limits, are held for a minimum of 6 years but this policy is subject to review.

### **Photocopies**

Where precise copies exist (i.e. photocopies) in multiple locations, only one record exists – this is in the office of its originating source.

### **Emails**

Email is potentially a record as its content usually concerns official business. It is therefore accessible under FOI act. All emails are Centre records not private records. Private email (i.e. not connected with the official business of the Centre) has no record status. Staff members are encouraged to control individual volume of emails periodically deleting non-essential materials. However, emails, which fall within the definition of perpetual records under the FOI Act, are maintained whether within the staff member's allotted space or centrally.

### **Records of Telephone Conversations**

A voicemail is a record. Records of all significant telephone conversations, informal meetings, and oral decisions should be taken and retained. These constitute records for the purposes of the F.O.I. Act.

### **Facsimile**

The record status of facsimile transmissions should be determined either at time of transmission or receipt. If a fax has record status it should be placed in the appropriate official file. Fax messages are automatically deleted when the buffer of the various fax machines gets full. Some fax messages are stored on computer hard drives where fax facilities are available on individual computers.

### **Exam Papers & Certificates**

Spare exam papers are generally returned to the relevant board and one copy retained by the Curriculum Manager. Certificates are sent to students via the external mail, there are some exceptions. Any Certificates not collected are retained for 12 months, after this period they are returned to the Examination Board.



## **Coursework Assessment Records**

It is recommended that Centre policy is that we return all coursework, where this is practical, to students after assessment to enable them to inform themselves of their progress. Students should retain any returned coursework and make it available to the Centre on request during the academic year of its creation. The Centre does not generally store students work, unless this is a requirement of the Awarding Body, particularly in relation to NVQ's - which must be kept for a minimum of 3 years.

Following final examination board meetings, all assessed materials held by the Centre will be made available to students and will be disposed of if not collected by the end of the academic year, unless alternative arrangements have been made with the Tutor. In some instances the materials used in the creation of coursework (e.g. physical models) may remain the property of the Centre.

## **Non-Record Documentary Material**

The following are generally regarded as non-record material: -

- Centre documentary materials that do not meet the definition or conditions of Centre record status.
- Extra copies of records, where the sole reason for such copies is for convenience or reference.
- Copies of Centre publications and computer generated reports (which do not comply with the definition of a record as referred to in an earlier paragraph).
- Personal documentation stored on paper or on computer files that do not relate to, or have an effect on, Centre business.

## **RECORD RETENTION SCHEDULE**

This policy sets out the minimum periods for which records should be retained. It is intended that this policy will be regularly updated to reflect and incorporate new and additional record categories.

The record retention schedule provides a mechanism to help ensure the Centre is maintaining necessary records for an appropriate length of time. The Centre is committed to effective records retention to ensure that it:

- meets legal standards;
- optimises the use of space; m
- minimises the cost of record retention;
- preserves the history of the Centre; destroys outdated and useless records.



Records included in the record retention schedule should be original, unique or of continuing importance to the Centre. They should have legal, fiscal, administrative or historical purpose. Duplicate or multiple copies of these records should be disposed of when they are outdated and no

longer useful. Retention Period The retention period should be the length of time that the record is useful or required to be kept by an external source, such as a law

Although a length of time may be specified some Centres or Service areas may elect to keep documents longer. This is a decision for each particular Centre or Service area, however, space requirements and cost should be considered.

If any record is related to an unresolved complaint, dispute or litigation involving the Centre, that record should not be discarded or destroyed regardless of the provisions of this record retention schedule.

### **Destruction of Records**

Records whose retention periods have expired should be destroyed promptly. Obsolete records absorb space, equipment, and supplies needed for active record, and make it more difficult to retrieve needed information from overcrowded filing cabinets.

#### **To destroy records:**

1. Document the destruction of records according to the Centre's internal policies. The Directors should approve any destruction of records; persons who create or use the records should be kept informed of the decision.
2. Records of a sensitive nature relating to personnel, medical, student records or other records that contain personal, evaluative, or confidential information, should be shredded or disposed of as confidential waste in accordance with the Data Protection Act 1998. Other records may be recycled or destroyed according to the standard procedures.