



TU Dublin Policy

Records Management, Retention
and Destruction Policy V1.0

Table of Contents

1. Document Control Summary	3
2. Introduction / Context	3
3. Purpose	3
4. Scope.....	3
5. Definitions	4
6. Policy Details:	5
6.1 Policy Overview	5
6.2 Records Management	5
6.2.1 Overview	5
6.2.2 Principles	5
6.2.3 Ownership	6
6.2.4 Responsibilities	6
6.2.5 Classification	6
6.2.6 Retention.....	7
6.2.7 Destruction	7
6.2.8 Archiving	7
6.3 Change Process.....	7
7. Related Documents	7
8. Document Management	8
8.1 Version Control.....	8
8.2 Document Approval.....	8
8.3 Document Ownership.....	8
8.4 Document Classification.....	8

1. Document Control Summary

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2. Introduction / Context

The University is responsible for the processing of a significant volume of data across each of its Schools and Service Areas, which serves as evidence of activities performed. It is therefore vital that good quality records are maintained, and everyone is aware of their responsibilities in relation to data management, retention, and destruction.

All staff and other persons charged with maintaining data/records or in possession of such data/records on behalf of the University must appropriately protect and handle data in accordance with the data's classification. This includes Governing Body and Governing body committee members.

3. Purpose

The purpose of this policy is to ensure that the University creates and manages usable and reliable records which are capable of supporting the University's functions and activities for as long as they are required. The objectives of the policy are to:

- support Records Management within the University;
- support the University's administrative and operational requirements, including compliance with legislation and University policies;
- ensure the preservation of records of permanent value;
- promote day-to-day efficiency and good records management;
- ensure destruction of records that no longer need to be retained in line with the University's Record Retention Schedules.

4. Scope

This policy applies to all records/data or information held on paper or in electronic format, by the University including documents, spreadsheets and other paper and electronic data and should be applied by all staff, Governing Body, and Governing Body Committee members. This policy is also applicable to data processors, third parties and collaborators working with the University.

Data Owners are responsible for assessing and classifying the data they work with and applying appropriate controls. Members of staff working with third parties or collaborators have a responsibility to bring this policy to their attention.

5. Definitions

- **Data** - As used in the University's suite of Data Protection Policies, shall mean information which either:
 - is processed by means of equipment operating automatically in response to instructions given for that purpose;
 - is recorded with the intention that it should be processed by means of such equipment;
 - is recorded as part of a relevant filing system or with the intention that it should form part of a relevant filing system;
 - does not fall within any of the above, but forms part of a Readily Accessible record.
 - Data therefore includes any digital data transferred by computer or automated equipment, and any manual information which is part of a Relevant Filing System.
- **Data Classification** - A process whereby information/data is classified in accordance with the impact of data being accessed inappropriately or data being lost. The resulting data classification needs to be applied when handling data. It is the responsibility of data owners to classify the data under their control.
- **Data Owners** – The original creator of the data, who can delegate ownership and assign roles and responsibilities.
- **Disposal/Destruction**- 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 the University.
- **Personal Data** - Information which relates to a living individual who is identifiable either directly from the data itself or from the data in conjunction with other information held by TU Dublin (the University). Examples of personal data include, but are not limited to:
 - Name, email, address, home phone number
 - The contents of a student file or an employee HR file
 - Details about lecture attendance or course work marks
 - Notes of personal supervision, including matters of behaviour and discipline.
- **Process data** - Means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaption or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- **Record** - information created, received, and maintained as evidence and as an asset by an organization or person, in pursuit of legal obligations or in the transaction of business.
- **Sensitive Personal Data (or Special Category Personal Data)** - relates to specific categories of data which are defined as data relating to a person's racial origin; political

opinions or religious or other beliefs; physical or mental health; sexual life; trade union membership; criminal convictions or the alleged commission of an offence.

6. Policy Details:

6.1 Policy Overview

The objectives of this policy are to:

- support records management within the University;
- support the University's administrative and operational requirements, including adherence to University policies and compliance with relevant legislation;
- ensure the preservation of Permanently Valuable Records;
- promote day-to-day efficiency and good records management;
- 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

6.2 Records Management

All records created and received by TU Dublin staff in the course of their duties on behalf of TU Dublin must be retained for as long as they are required to meet the legal, administrative, financial, and operational requirements of the University, after which time they are either destroyed or transferred to the TU Dublin archives. The final disposition (either destruction or transfer to the archives) of records is carried out according to approved schedules as approved by the UET.

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

6.2.1 Overview

Records Management is the application of controls and procedures to the creation, maintenance, use and disposition of records.

Records Management includes inter alia: records classification; management of filing systems, retention scheduling; the administration of inactive records storage; management of record conversion programmes; disaster planning; Permanently Valuable Records protection; archival preservation activities; permanent archiving and appropriate destruction of records.

The nature of records requires that consideration be given to security, privacy, authenticity, accessibility, version control, handling, preservation, and the disposition of such records.

6.2.2 Principles

The University is committed to ensuring that a framework for records management is established and maintained within the University, to assist and enable employees to adhere to University policies and thereby meet regulatory compliance obligations, confidentiality requirements and business needs.

The University is committed to responsible collection, handling, retention, and destruction/archiving of records.

The University is committed to ensuring roles and responsibilities are clearly defined in relation to Records Management.

6.2.3 Ownership

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

6.2.4 Responsibilities

This policy is also applicable to staff working with the University, data processors, third parties and collaborators working with the University.

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

Where records are jointly created with other organisations, those sharing ownership should agree how records are to be stored, managed and final disposition.

All staff are required to employ the following best practice in the management of records and responsibility for monitoring implementation rests with the Head of each School/Service Area:

- sensible and consistent naming of records and files;
- systematic set up and maintenance of filing systems to facilitate retrieval;
- ensure appropriate security measures are in place and storage of records in a manner that ensures access for authorised users only;
- protection of vital records and backup of appropriate files on a regular basis;
- the management of records held in off-site storage etc;
- business continuity planning;
- preservation of records of permanent value in order to ensure continued and appropriate access to them;
- regular, secure destruction of records (including email records) in accordance with the Classification & Retention Schedule;
- restrict access to record systems (e.g., by ensuring appropriate permissions are in place for all University systems, use of passwords, timed lock out of PCs etc.).

6.2.5 Classification

When users process data in the University it should be organised into a category of classification.

The University's data will be classified into four categories of classification depending on their levels of risk and importance to provide a basis for understanding and managing the University's data. The majority of data processed by the University will fall within the categories Public and Internal. The minority of data will be categorised as Restricted or Confidential.

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

6.2.6 Retention

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

The Records Retention Schedule prescribes the retention period for a range of records held by the University.

Any School/Service Area which considers that records should be retained for a longer or shorter period than that set down in the University Retention Schedule is required to consult with the Information Governance Office to ensure that reasonable justification exists for their retention.

6.2.7 Destruction

When scheduled for destruction, the manner of destruction of records must be appropriate to the classification label assigned to those records.

In the case of in-house destruction, the area must document and retain the date and manner of destruction of records.

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

Destruction of records is to be carried out in accordance with the Authorised Records Disposal Procedures.

6.2.8 Archiving

Records that have been identified as Permanently Valuable Records are to be archived in accordance with the Records Retention Schedule.

6.3 Change Process

This policy will be reviewed within the first year of operation and will be updated to ensure continued relevance with any legislative or operational effectiveness requirements in consultation with relevant stakeholders.

7. Related Documents

Related documents to this policy include:

- Data Protection Policy
- Data Classification Policy
- Records Retention Schedule
- Authorised Records Disposal Procedures
- Email Management Procedures

8. Document Management

8.1 Version Control

VERSION NUMBER	VERSION DESCRIPTION / CHANGES MADE	AUTHOR	DATE
<i>Draft 1.0</i>	<i>Initial Draft</i>	<i>Joanne Lumley</i>	<i>21st February 2023</i>

8.2 Document Approval

VERSION NUMBER	APPROVAL DATE	APPROVED BY (NAME AND ROLE)
<i>1.0</i>	<i>29th November 2023</i>	<i>Governing Body</i>

8.3 Document Ownership

This document is owned by the Head of Governance and Compliance.
Document Updates + Information Governance Senior Manager.

8.4 Document Classification

This policy will be classed as TU Dublin Public and is available to all staff, students and members of the public who wish to view it.