



**lwetb**

Bord Oideachais agus Oiliúna  
an Longfoirt agus na hIarmhí  
Longford and Westmeath  
Education and Training Board

|                        |   |
|------------------------|---|
| <b>Business Owner:</b> | <b>Organisation Support &amp; Development</b> |
| <b>Document Title</b>  | <b>Record Management Policy</b>               |
| <b>Document No.</b>    | <b>DP014/RM/V1/25</b>                         |
| <b>Approved By</b>     | <b>LWETB Chief Executive</b>                  |
| <b>Noted By</b>        | <b>LWETB Board</b>                            |
| <b>Date</b>            | <b>January 2025</b>                           |

# Longford and Westmeath Education and Training Board

## Records Management Policy

## 1. Purpose

- 1.1** To provide a statement of intent outlining records management standards for the administration of Longford and Westmeath Education and Training Board (LWETB) records.

All documents created and received in the course of its official business, as laid out in the Education and Training Boards Act 2013 and formerly under the Vocational Education Act 1930 to 2001, constitute the official records of the ETB. The information that LWETB records contain serves as evidence of functions executed and activities performed and comprises a valuable source of knowledge as to how and why decisions were taken. Given that good quality records are of value to any organisation, their effective management is necessary to ensure that the records maintained are authentic, reliable and complete and to ensure that they are protected and preserved as evidence to support future actions and to ensure current and future accountability.

- 1.2** To implement records management procedures and to create retention/disposal schedules for LWETB records.

Records management is the application of controls to the creation, maintenance, use and disposal of all formats of records, elements of which include correspondence and forms, records classification, files, identification of the function/staff member responsible for the record, retention scheduling, disaster planning, vital records protection, the administration of inactive records storage, record conversion programmes, archival preservation activities and destruction of records.

Good records management is of special significance in the context of LWETB's functions, where the maintenance of records is essential to good corporate governance.

- 1.3** To ensure preservation of records of permanent value and to establish archival criteria to maintain and assure continued access to appropriate historical records.
- 1.4** To support both protection of privacy and freedom of information services throughout LWETB.
- 1.5** To propose the development of guidelines to accompany this policy document including retention and disposal schedules for general records common to all LWETB departments and sections/units.
- 1.6** To develop policies and guidelines for the use of electronic media in the creation/capture/receipt/retention of information

## 2. Scope

- 2.1** All information created or received by LWETB staff in the course of their duties on behalf of LWETB, preserved in the form of records, are covered by this policy. Records can be in a variety of physical forms including: paper documents – both written and printed matter; electronic records (i.e. word processing files, databases, spreadsheet files, e-mails, electronic data on any media, etc.); books; drawings; photographs; or anything on which information is recorded or stored by graphic, electronic or mechanical means, or copies thereof, received by any academic or administrative office of LWETB in connection with the transaction of LWETB business and retained by such office as evidence of the activities of LWETB or because of the information contained therein. It is emphasised here that this policy is equally applicable to records created and preserved in electronic and digital format as it is to paper records.
- 2.2** This policy applies to records that may be released under the Freedom of Information Act 2014 and the Data Protection Act 2018 or the General Data Protection Regulation (GDPR).
- 2.3** This policy is applicable to all areas and locations of LWETB and includes all departments, offices, schools, centres and areas of work which form part of the LWETB structure.

## 3. Ownership of Records

- 3.1** All records, irrespective of format, (i.e. both textual and electronic, including e-mails) created or received by LWETB staff in the course of their duties on behalf of LWETB, are the property of LWETB and subject to its overall control. Employees leaving LWETB or changing positions within LWETB must leave all records intact for their successors.

## 4. Legislation

There is a wide variety of legislation governing records and record keeping in Ireland. With increasing demands for the public sector to adhere to a more accountable and transparent way of operating, the volume of legislation governing record keeping is constantly growing. This has implications for those responsible for systems maintenance, review and auditing, business continuity, records retention and disposition.

### 4.1 The Data Protection Act 2018 & the General Data Protection Regulation (GDPR)

The Data Protection Act 2018 and GDPR cover information kept in electronic systems and paper records that relate to a living person. The Act and the GDPR specify that a time limit must be established for the erasure of data. The principles of 'data minimisation' and 'storage limitation' are introduced to enforce that information must be adequate, relevant and limited to what it is necessary for the purposes of processing. It also states that this data should not be kept for longer than is necessary.

## 4.2 The Freedom of Information Act 2014

In April 2014 ETBs became subject to the terms of the Freedom of Information Act 2014. The FOI Act provides the following statutory rights:

- the right to access records held by public bodies covered by the Act
  - the right to have personal information in a record amended where such information is incomplete, incorrect or misleading
  - the right to obtain reasons for decisions taken by public bodies affecting the person.
- i) Education and Training Boards Act 2013
  - ii) Vocational Education Acts 1930 to 2001
  - iii) Education Act 1998
  - iv) Education Welfare Act 2000
  - v) Comptroller and Auditor General Act 1993
  - vi) Department of Education and Skills Circular 0018/2015 Code of Practice for the Governance of Education and Training Boards
  - vii) ETBs Internal Audit Unit (formerly VSSU) Guidelines

## 5. Management of ETB Records

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

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

**5.3** LWETB administers a number of programmes funded by the European Union's European Regional Development. In addition, a number of programmes such as Adult Literacy, Youthreach and BTEI are co-funded by the EU and from time to time other programmes may be in receipt of EU funding. EU requirements stipulate that all records relating to such programmes must be kept for at least seven years from the end of the programme, however, the EU will notify the organisations of the exact retention time closer to the expiry date of each programme. This notification must be forwarded to the DPO at [dp@lwetb.ie](mailto:dp@lwetb.ie) and **no records must be destroyed/deleted until the DPO releases a formal notification of the expiry date of each programme.**

## 6. Responsibilities

**6.1** The Chief Executive is responsible for the internal control of LWETB, an element of which must be the retention of records used in the decision-making process for key decisions in order to demonstrate best practice and the assessment of risk.

**6.2** It is the responsibility of the individual members of staff to ensure that the appropriate security measures are observed for maintaining records containing personal or other confidential information. When scheduled for destruction, this material must be shredded, pulped, incinerated or otherwise disposed of to ensure that such information is not disclosed.

**6.3** It is the responsibility of each Principal/Director/Co-ordinator/Head of Section to operationalise this policy and to designate and inform the appropriate responsible officers in the creating/receiving department/office/school/centre.

**6.4** A disposal register must be created and maintained by each administrative department/school/centre/programme.

## 7. Procedures

**7.1** Staff in departments/offices/schools/centres will carry out an audit of records held and draft Records Retention Schedules for LWETB records that define the length of time that specified types of records are to be retained the rationale for the retention period, as well as their final disposition once the retention period expires.

**7.2** The draft schedules will be forwarded for final approval to the Chief Executive.

**7.3** After the records have been retained by the creating or receiving department/office/school/centre (in-situ or off-site storage) for the requisite time in the records schedules, they are either destroyed or archived for permanent retention.

**7.4** It should be noted that the guidelines in the appendices contain schedules which give a generic outline of recommended minimum retention and disposition periods for records series. This is designed to facilitate department/office/school/centre, etc. in the development of retention and disposal schedules for records.

These schedules are based on a determination of the following: legal retention requirements as defined in relevant statutes and regulations; administrative and operational requirements; and general best practice. The potential historical value of records is also a consideration.

The development of Records Retention Schedules is an on-going process.

## 8. Electronic/Digital Records

The same records management principles and policies applied to paper records must also govern the management of electronic/digital records. However, the technological nature of electronic/digital records requires that special consideration be given to matters such as authenticity, accessibility, version control, preservation and disposal.

**8.1** Electronic/digital records should have the same retention schedules as their paper counterparts.



**8.2** In the absence of any electronic records management systems, staff should be encouraged to employ good housekeeping practices in the management of electronic/digital documents, i.e. employ a naming convention, have a back-up schedule, delete regularly (especially e-mails), use passwords as appropriate, produce paper copies if required to maintain the integrity of manual files, etc.

**8.3** In the case of electronic records stored in file servers or data stored in relational databases where the computer equipment is maintained by the IT Systems Administrator, the department which created or maintains these records must formally agree back-up and recovery procedures with the IT Systems Administrator. This is to ensure that there is no ambiguity as to which department is responsible for records in the event of hardware failure or accidental deletion of records.

## 9. Implementation and Review

This document will be reviewed at least biennially by senior management in line with best practice, or in light of changes in legislation and guidance from sources such as Internal Audit, C&AG, the Department of Education, the Department of Further and Higher Education, Research, Innovation and Science and the Department of Public Expenditure & Reform, on the issuing of circular letter or by the Chief Executive in response to business needs. The date of implementation is the date of Chief Executive approval.

## 10. Ownership and Authorisation

| OWNER                                       | DATE         | SIGNATURE   |
|---|--------------|---|
| Organisation Support & Development Director | Jan 15, 2025 | <br>Charlie Mitchell (Jan 15, 2025 09:59 GMT) |
| AUTHORISED BY                               | DATE         | SIGNATURE   |
| Chief Executive                             | Jan 15, 2025 |   |

## APPENDIX A

### Definitions

#### *Longford and Westmeath Education and Training Board (LWETB) Records:*

Records created or received by LWETB staff in the course of their duties on behalf of LWETB, can be in a variety of physical forms including: paper documents including both written and printed matter; books; drawings; electronic data on any media; photographs; or anything on which information is recorded or stored by graphic, electronic or mechanical means, or copies thereof received by an school/centre/programme or administrative office of LWETB in connection with the transaction LWETB business and retained by such office as evidence of the activities of LWETB or because of the information contained therein.

#### **Current Records:**

##### *Active Records:*

Active records are records that are required and referred to constantly for current use, and which need to be retained and maintained in office space and equipment close and readily accessible to users.

##### *Semi-active Records:*

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

#### **Non-Current Records:**

##### *Inactive Records:*

Inactive records are records which are no longer required to carry out the functions for which they were created. They should be stored until the retention period has lapsed.

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

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

##### *Permanent:*

*To be retained permanently by the office. Alternatively, if the records are considered inactive, arrangements may be made to have them transferred to an external storage facility or to be scanned for electronic storage.*

##### *Records Retention Schedule:*

A Records Retention Schedule is a control document that describes LWETB's records at a series level and indicates the length of time each series shall be retained prior to final disposition; the rationale for retention 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 under a policy as decided by LWETB or transfer to archival storage for selective or full retention.

##### *Records Series:*

Groups of related records that are created and used with a common purpose, for example, financial records; personnel records; examination results, board/committee minutes; etc.

## APPENDIX B

### Records Management Guidelines for Staff

#### ***Why do we keep Records?***

Records are created to support and enable LWETB to conduct the business process, to ensure accountability, to fulfil its legal obligations and to ensure the continuous operation of LWETB in the event of a disaster. As such they have administrative, evidential, legal and fiscal value. Further, with regard to legislation most notably the Data Protection Act 2018, GDPR and the Freedom of Information Act 2014, LWETB is obliged to keep up-to-date records and efficient means of accessing them to fulfil its legal commitments.

Areas of particular concern in the context of Data Protection and Freedom of Information compliance include:

- Difficulties in identifying records or files in their entirety without an enormous amount of detective work. This problem is caused by practices that include holding of hybrid paper and electronic versions of files without any form of integration and cross referencing, related information being held by several members of staff and poor management of draft and definitive versions of documents.
- Rampant duplication of information. Under Data Protection and Freedom of Information, a requester is entitled to be informed of the existence of duplicate copies of a record and access these copies if he or she so wishes. Although this is an unlikely request, it may cause problems if the request is vexatious in intent.
- Poor informational quality of some records or absence of documentary evidence of a transaction caused by concerns that keeping confidential information related to an individual may be problematic.

#### ***What is the Lifecycle of a Record?***

Each record has a Life Cycle, which is as follows:

1. Current Records: Are those that are held on site in offices and are used on a very regular basis.
2. Non-current Records: These are records that are needed for occasional reference. Can be held on site in a dedicated storage area or stored off site with easy access.
3. Disposition: Records should either be archived or disposed of.

#### **Retention and Disposal**

LWETB's Records Retention Schedules detail records held within LWETB. This will be implemented at Departmental/School/Centre level and reviewed on an annual basis. It is the responsibility of the Principal/Director/Co-ordinator/Head of Section to ensure that records are scheduled as necessary to be retained in the appropriate storage facility or disposed of. If a file is to be destroyed, then a Destruction Record needs to be completed by the employee and countersigned by the senior member of staff responsible for records destruction. The Destruction Record should be filed and kept permanently.



## **The benefits of using records schedules are as follows:**

- Ensures that important records are organised and maintained in such a way as to be easily retrieved and identifiable as evidence of activities especially in the event of an audit, a Data Protection or Freedom of Information request or discovery in the event of a lawsuit.
- Conserves office space and equipment by using filing cabinets only to store active paper records and conserves server space by streamlining electronic records captured into electronic document management packages.
- Saves money by moving inactive files to other storage areas until they are ready for final disposition.
- Helps preserve those records that are valuable for historical or other research purposes.
- Controls the growth of records in offices through the systematic disposition of non-current records.

## **Current Record Keeping**

Departments should ensure that if using filing cabinets, they are updated regularly and well organised.

## **Vital Records**

The Schedule of Records holds a list of the vital records held within LWETB. Board/ Committee meetings, Sub-committee meetings, Board of Management meetings, financial information, legal documentation etc should be included in this. It is recommended that vital records be duplicated with one set being stored on site and the other set, in softcopy in cases where a hard copy exists. Where a hardcopy does not exist LWETB should ensure these documents are appropriately backed up and recoverable.

## **Accountability**

Overall responsibilities as an organisation

Responsibilities at LWETB level are to make and preserve records that contain adequate and proper documentation of the organisation, functions, policies, decisions, procedures and essential transactions of LWETB. LWETB systems are also designed to protect the legal and financial rights of those directly affected by LWETBs activities.

## **Employee responsibilities**

This policy will impact on all areas of organisational work practices, e.g., those who create records in any format, have access to records, or have management responsibility for staff engaged in any of these activities.

All employees are responsible for making and keeping the records of their work and should:

- Create records needed to do the business of LWETB, record decisions and actions taken, and generally document activities for which they are responsible and take care of records so that information can be found when needed. This means establishing or adhering to good directories and files, and filing materials (in any format) regularly and carefully in a manner that allows them to be safely stored and efficiently retrieved and returned when necessary.
- Carry out the disposition of records, which are under their control in accordance with LWETB's records retention schedule.

## APPENDIX C

### Filing Guidelines

1. Before filing a piece of paper, ask yourself, "Will I need this in the future?" Don't keep a piece of paper just on the chance that you may need it "someday."
2. Don't always save every draft of a document. For most purposes the final version is sufficient.
3. Don't file multiple copies of the same document, unless justified.
4. The originator normally keeps copies of reports and correspondence. Just because a document is sent to you doesn't obligate you to keep it indefinitely. If you need to see it again, ask the originator for another copy.
5. If, for example, records are scheduled for destruction after three years, don't store them for five years.
6. In general, records received from Longford and Westmeath ETB schools/centres/offices should be filed under the name of the originating school/centre/office.
7. Some records may belong under more than one series or category. To handle this, file the records in one category and place a cross-reference note in the other. It is important to be consistent in deciding where to file records. Once information is filed in a given series and category, it should always be filed there.
8. Label and date all files.
9. Color-coding the different series is a useful tool, especially for refiling folders.
10. Create a file guide with a description of the filing system and instructions for the user so new personnel can continue to use the filing system easily. This will also avoid the arbitrary creation of new file folders.
11. Create cross-listings to help locate items. Create a file database on the PC using the file-folder heading, cross-listing, and location notes.
12. Spell out acronyms and abbreviations.
13. Sort records prior to filing.
14. Use staples rather than paper clips in folders.
15. Discard envelopes if the return address is available on the document itself. Most phone messages, illegible notes, and routine acknowledgements can also be discarded.
16. Do not overfill file folders. If they are overfilled, divide them into several folders with the same name and File number (e.g.: Maternity Leave Applications 2008/2009, File 1).
17. Do not overstuff file drawers. This can make retrieval of files difficult, as well as creating a dangerous work environment.
18. Weed files regularly, using established retention schedules.
19. Consider using "Out Markers" when removing folders for use. This makes refiling much easier and lets others in the office know that a file exists so another is not created, who has the file, and when it was checked out.





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## RECORD OF DESTRUCTION OF DATA BY CONFIDENTIAL SHREDDING

| BRIEF DESCRIPTION OF DATA | CONTAINS PERSONAL DATA Yes/No | DATE/S OF DOCUMENT/FILE | DATE OF DESTRUCTION | INITIALED |
|---------------------------|-------------------------------|-------------------------|---------------------|-----------|
|                           |                               |                         |                     |           |
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