

**TITLE: RECORDS MANAGEMENT POLICY**

<b>Effective Date</b>	15 March 2023	<b>Version</b>	4.1
			The policy was updated to include links to the Records Retention Schedule and Recordkeeping Manual.
<b>Approved By</b>	Management Board	<b>Date Approved</b>	15 March 2023
		<b>Review Date</b>	12 May 2026 <i>or as required</i>
<b>Superseded or Obsolete Policy / Procedure(s)</b>		<b>Owner</b>	
See the Version Control Register at the end of this Policy.		Archivist	

**1. Purpose of Policy**

Carlow College, St. Patrick's (hereafter Carlow College) processes vast amounts of information and records daily. Records are a valuable source of knowledge and comprise evidence of College functions and activities. The effective management of records is necessary to ensure informed decision-making and forward planning, and the promotion of accountability and transparency.

The purpose of this *Records Management Policy* is to set down the high-level principles and precepts which underpin how Carlow College manages records within its custody and control. Work on the implementation of a comprehensive records management system is ongoing. This Policy will be at the centre of a framework of related and more explicit policies and procedures. A Recordkeeping Manual comprises guidelines for staff.

Various regulations, legislation and quality assurance guidelines require Carlow College to create and keep records and manage them effectively. Such imperatives include, but are not limited to, quality assurance guidelines issued by Quality and Qualifications Ireland; the *Freedom of Information (hereafter FOI) Act 2014*, the General Data Protection Regulation (hereafter GDPR) and the Data Protection Acts 1988 to 2018, and legislation and regulations which apply to the College as a registered charity. All policies and procedures which form part of the records management framework will accord with regulatory and legislative requirements, best practice and standards such as *ISO 15489 Records Management*.

A further motivation for a quality records management system is to support the business needs of Carlow College; to ensure that the College creates and keeps records which are authentic, reliable, complete and available for as long as they are required, and capable of supporting the College's functions and activities.

## 2. Definitions

**Records** are documents in all formats and media created and received in the course of official duties, and constitute evidence of Carlow College's functions and activities. Examples of records include, but are not limited to, emails, letters, minutes of meetings, spreadsheets, databases, photographs, maps, drawings, voice messages and recordings, text messages, social media postings, closed-circuit television (CCTV) and other film footage, examination scripts, and information held in systems such as those used for student information and financial management.

**Records management** is the application of documented policies and procedures to the creation, maintenance, use and disposal of records, and includes areas such as correspondence/email and forms management, version control, the relationship between electronic and hard copy records, records classification, retention scheduling, disaster management, vital records protection, records storage and security, the management of records conversion programmes, destruction of records and transfer to the archive service.

**Archives** are documents in all formats and media which merit permanent retention due to ongoing administrative, legal, financial, historical or intrinsic importance. Some 2-8% of records are retained as archives. A separate suite of policies, approved by the Delany Archive Trust, refers to the management of archival records owned by Carlow College.

## 3. Scope of Policy

This Policy applies to all records created and received by College Governors and employees in the course of their official duties. Such records are owned by Carlow College and persons leaving the College or changing position within it, are required to leave all records for their successors.

With regard to employees, except in exceptional circumstances, all College records are to be captured within official systems. Where records are created or received in non-official systems, they are to be copied to official systems. It is acknowledged that College Governors may be based externally to the College premises and capture within official systems in the same way is not possible. However, College Governors are to use their Carlow College email accounts for College business.

Due to the requirements of legislation, including the *FOI Act* and Data Protection legislation, records held by Carlow College service providers may also fall within the scope of this Policy.

## 4. Policy Statement

The principles that underpin this Policy are the promotion of accountability and transparency; compliance with regulatory, legislative and quality assurance requirements; and facilitation of efficient and informed administration and management.

The implementation of a comprehensive and quality records management system has numerous benefits:

- Carlow College is in receipt of public moneys and is a registered charity. The application of documented policies and procedures to recordkeeping promotes accountability and transparency, and enhances stakeholder confidence as to how the College manages its affairs; the maintenance of quality information and records systems promotes ease of adherence to oversight requirements, including audit and quality assurance;
- effective records management permits the College to protect its own interests as well

as those of stakeholders, including learners, employees, oversight bodies and the wider community;

- to support both protection of privacy and freedom of information services.

A quality records management system also has internal drivers as it will assist the College to:

- conduct business in an orderly and efficient manner;
- ensure that adequate records documenting core functions and activities are kept;
- deliver services in a consistent and equitable manner;
- support and document decision-making, policy formulation and forward planning;
- promote certainty for employees as to how to administer records, including what records are to be created and kept, and for how long;
- preserve the heritage and corporate memory of the College.

## **5. Roles and Responsibilities**

Specific and detailed responsibilities will be delineated in further policies and procedures which form part of the records management framework, but in general:

- all employees who create and keep records as part of their official duties are responsible for them in a wide sense. The general replacement of centralised departmental recordkeeping systems with more individual ‘systems’, including email accounts and personal computer drives enhances the level of responsibility of all employees;
- line managers have operational responsibility for records relating to their functional areas, including any systems particular to their departments;
- line managers are responsible for periodically reviewing records retention schedules and notifying lacunae and required updates to the Archivist;
- it is the responsibility of the Archivist to: devise policies and procedures for consultation with operational employees and for relevant approval; report on compliance; and advise on records and archival issues;
- Carlow College’s archives are cared for by the Delany Archive Trust. The Delany Archive is located in Carlow College’s premises. Trustees are nominated by each of the Archive’s partners, and they approve and direct the Archive’s activities and policies.

## **6. Associated Documentation<sup>1</sup>**

- Appendix 1: Managing Meetings Records
- Appendix 2: [Recording Keeping Manual](#)
- Appendix 3: [Records Retention Schedules](#)

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<sup>1</sup> It is not feasible to list all regulations and legislation which require Carlow College to create and keep records. Overarching and important requirements include regulations issued by QQI; audit rules; Freedom of Information and Data Protection legislation; and employment law. The records management framework will also be in accordance with relevant international standards such as *ISO 15489 Records Management*. The *Records Management Policy* will be at the centre of a framework of related and more explicit policies and procedures.

- Recordkeeping Manual

## 7. Referenced Policies

- *Data Protection Policy*
- *Freedom of Information Policy*
- Policies of IT Services
- Policies of the Delany Archive Trust

## 8. Monitoring and Review

The *Records Management Policy* is approved by Management Board. The Archivist will monitor this Policy annually with a policy review scheduled five years after the effective date.

### Version Control Register

Version Number	Superseded or Obsolete Policy / Procedure(s)	Date Approved	Changes
1	<i>Interim Records Management Policy</i>	6 December 2011	Initial Issue
2	<i>Records Management Policy</i>	17 January 2018	Interim policy replaced with the addition of high-level policy principles aligned with the CCSP <i>Policy on Policies</i> . The policy notes areas of further development required.
3	<i>Records Management Policy</i>	5 September 2018	Addition of a Records Management Manual.
4	<i>Records Management Policy</i>	12 May 2021	The policy updated to include the addition of the Records Retention Schedules.

## Appendix 1: Managing Meetings' Records



### Managing Meetings' Records

#### 1. Introduction

Important decisions are taken during meetings, and it is necessary that Carlow College, St Patrick's (hereafter Carlow College) has reliable evidence about decisions it has taken, and how and why it arrived at them. This document aims to provide guidance to Carlow College committees about managing meeting records, including their content, storage and retention.

This guidance applies to all formal Carlow College committees. If there is conflict between this guidance and a specific protocol that applies to a committee, the protocol must be followed. Other groups may find it useful to implement some or all of this guidance e.g. staff and project teams, and policy sub-groups.

#### 2. Definitions

**Meeting records** include the agenda, minutes, tabled and circulated documents, and correspondence.

**Meeting packs** contain **meeting records** provided to members prior to a meeting.

**Official meeting records** are those held by the individual (usually the Chairperson or Secretary) responsible for day-day-management of a committee's records. Copies held by other committee members are duplicate records.

#### 3. Roles and responsibilities

- It is the responsibility of the **Chairperson** to ensure that this guidance is implemented.
- If a **Secretary** is in place, this role is responsible for day-to-day management of meeting records in line with this guidance. If there is no Secretary, the **Chairperson** is responsible for these duties.
- If the committee does not have a Secretary, it is permissible for a **recording secretary** (appointed individual or rotating) to take minutes to assist the Chairperson, but management of the records rests with the Chairperson.
- Where the person responsible for day-to-day management of records leaves the committee's membership (e.g. new duties or leaves Carlow College's employment), this person is to transfer the official meeting records to the **Chairperson**. If this latter role is vacant, the responsible person is to transfer the records to either the **Quality Assurance Officer** or **Archivist**, who will keep the records safely and give them to the incoming Chairperson.

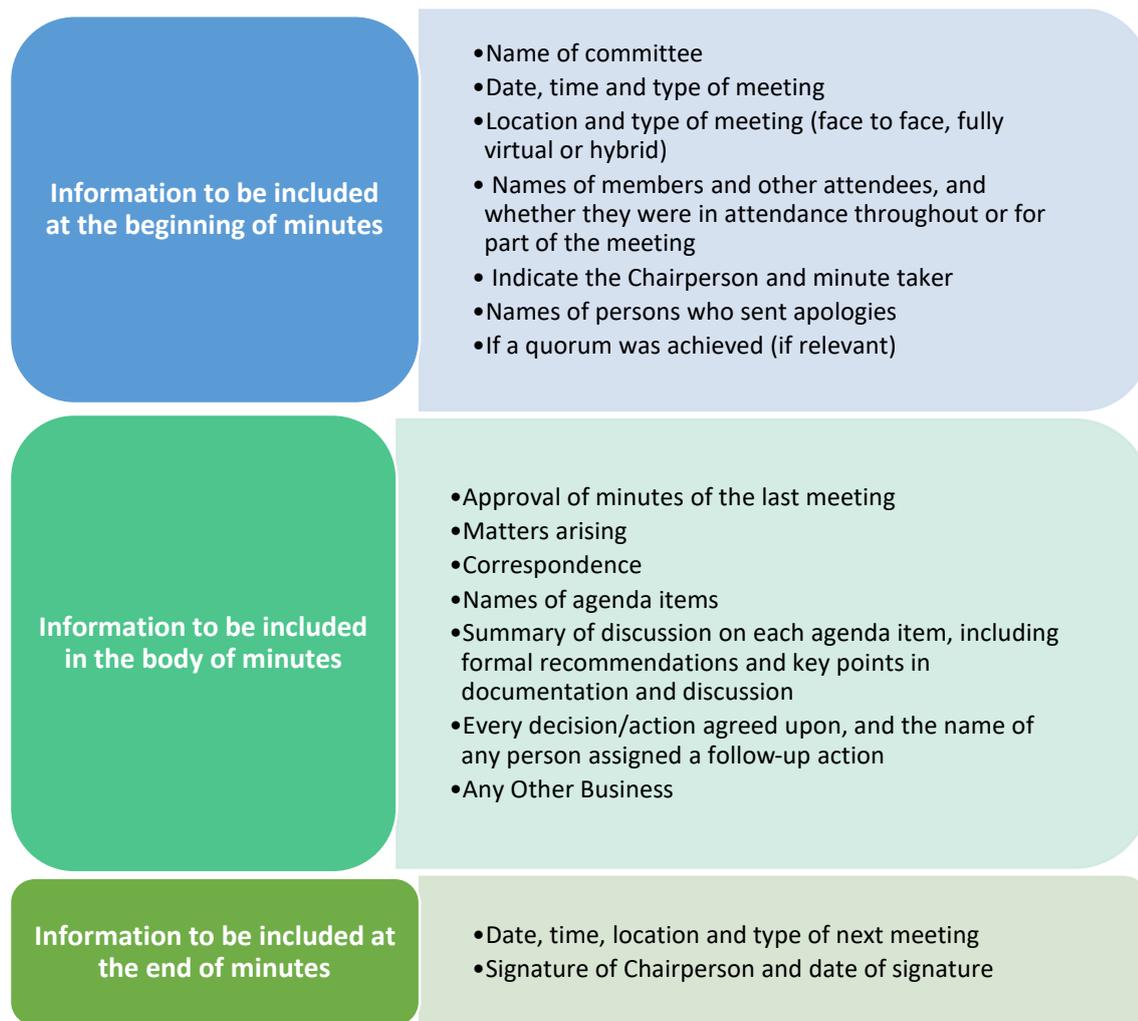
- If a committee is being wound up, the **Chairperson** should discuss the safekeeping of the records with the Quality Assurance Officer and Archivist.
- **IT Services** is responsible for creating folder permissions.
- The **Archivist** is the owner of this guidance and is available to assist committees with its implementation.
- **Developing the agenda**
- The Chairperson is usually responsible for agenda development, but where possible, should ask members if they have items they wish to add.
- For efficiency, create a template agenda that lists items that form part of every meeting, and add to this.

#### 4. Scheduling meetings

- If meeting times are decided well in advance e.g. at the beginning of the academic year, send the invitations to members at this time, so that they are in their diaries.
- The responsible person is to ensure that distribution lists are kept up to date as members join and leave the committee.

#### 5. Taking minutes

- For efficiency, use a template to create minutes and draft them electronically at the meeting rather than taking handwritten notes.
- A template for minutes is available at [Appendix 1](#). It can be altered to suit the requirements of committees. The template reflects the information items outlined in Fig. 1.
- Bold or highlight follow-up actions to assist the responsible member.



*Fig. 1: Information to be recorded in minutes.*

## 6. What should and should not be in minutes

- Minutes are records of vital business decisions and they should be clear and detailed enough that Carlow College can rely on them as evidence of those decisions, and understandable by individuals who did not attend the meeting. However, minutes should not be a verbatim or hugely detailed record of discussions and documentation – they should contain key points only.
- Where documentation (e.g. a report) is circulated in advance of a meeting, or tabled at it, it is not necessary to include the text of the report in the minutes. Instead, the minutes should focus on the main points of the documentation and discussion arising from the report. The documentation should be preserved as part of the meeting record.
- In general, minutes should not name individual members who have made contributions to the meeting. Instead, the minutes should include a statement such as ‘The following points were discussed...’ This general rule may be overturned in some circumstances e.g. if a contributor wishes to be identified and members agree, if the member is responsible for a particular action, or if they have specific professional experience on a subject.
- If a meeting is responsible for making a decision about a person, it is important to refer to them by name in the meeting records to create a reliable record. Referring to a person by

their initials, pseudonym etc. to protect confidentiality is misguided. The correct approach is to identify the person in the meeting records and to protect confidentiality by limiting access to those records. If meeting records are shared outwith committee membership, this should be done by a method appropriate to the situation e.g. redacting the minutes or creating a summary report. Human resources matters about identifiable employees (e.g. sick leave) should not be discussed at committee meetings.

## **7. Reports submitted to meetings**

- Members and other staff may submit reports to committee meetings. As reports form part of the meeting record, reports should be written formally, concise, accurate and objective.
- The author should ensure that the content of their report is appropriate for its intended audience. Human resources matters about individual employees (e.g. sick leave) should not be included in reports.
- Reports should be emailed to the Chair or Secretary of the committee.
- The Chair and/or Secretary (as agreed between them) is responsible for ensuring that the content of reports is appropriate to the committee. If it is not, minor changes (e.g. typos) may be made by the Chair/Secretary, and the report should be returned to its author for editing if larger changes are required.
- For consistency, the Chair/Secretary may find it useful to put a template in place for staff who report to meetings, and to let them know of these arrangements.

## **8. Creating and circulating draft minutes**

- Draft minutes should be typed up as soon as possible after the meeting while memories are fresh. They should be marked 'Draft' to avoid confusion between draft and approved minutes. This can be done in Microsoft Word using **Design > Watermark > Custom Watermark > Text Watermark, and using the Text dropdown to select 'DRAFT.'**
- If both roles exist, draft minutes should be agreed between the Chairperson and Secretary before circulation to members. It is recommended that the Chairperson and Secretary have a OneDrive folder private to them, to facilitate sharing of draft agenda, minutes etc.
- Draft minutes should be circulated to members as soon as possible after the meeting (a maximum of ten business days), but sooner if the next meeting is to follow quickly or follow-up actions are due.

## **9. Approving minutes**

- Draft minutes should be formally approved at the next meeting. Members who wish to suggest an alteration to draft minutes should do so at this meeting.
- Draft minutes and notes should usually be securely destroyed/deleted once the minutes have been approved. In practice, draft minutes can be overwritten, if changes are required. To avoid confusion, it is best not to retain separate draft and approved minutes files. See this section for further information: [How long should be meeting records held for?](#)

## 10. Signatures

- Approved minutes sometimes include the signature(s) of the Chairperson, and perhaps the Secretary. It is not necessary for minutes to be signed, but if it is decided to include a signature(s), it can be digital e.g. the Chairperson might provide a scan or other image of their signature to the Secretary for addition to the minutes.
- Digital signatures are preferred to manual/handwritten signatures. If a manual signature is used, the paper copy is the official meeting record. If this is the case, it is good practice to create a backup copy, for instance, through scanning and saving them to a backed up location e.g. a network folder.

## 11. Sharing records with committee members

### a. Central storage location

- Each committee has a folder on the server in which its records are stored, and to which members have access.<sup>2</sup> Learner members who do not attend all parts of meetings do not have access to these records. The folder is used for storage of records such as meeting packs shared prior to meetings, and draft minutes, which are added soon after meetings.
- The central storage location is located and structured as follows:
- There is a master folder on the server entitled ‘CommitteeMeetings.’
- Each committee has a subfolder. The committee’s name is the subfolder name.
- Each academic year is a subfolder of the committee folder. Access permissions are granted at this level.
- The Chairperson is responsible for notifying committee membership (except learner members) to [itsupport@carlowcollege.ie](mailto:itsupport@carlowcollege.ie) by 1 September of each academic year in order for folder permissions to be assigned. The Chairperson is additionally responsible for notifying membership changes (joiners and leavers) to IT Support as soon as possible at other times of the year.
- See the [Organising files](#) section for guidance on how to structure meeting records within the academic year subfolder.
- The Chairperson and/or Secretary will have full editing permissions to the folders described above. All other committee members will have ‘read only’ access. This means that that will be able to view files but will not be able to change, create or delete files. All files stored in this location are saved as PDF files.
- Members have access only to records relevant to the period during which they are on the committee. An exception may be made if previous business is relevant to current business, however, only directly relevant records should be shared to

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<sup>2</sup> Slightly different arrangements may apply if a committee has an external member(s) (i.e. non-staff or non-learner). This may include use of OneDrive or a Microsoft Team. In all cases, records should be structured so that members only have access to records that cover their term of membership. The Chairperson should agree arrangements with the Archivist and IT Services.

protect confidential information and/or personal data. The Chairperson has access to all records of the committee regardless of date created.

- Meeting packs are to be shared with members at least three business days prior to a meeting.

**b. Documents shared for comment**

- If it is necessary to share documents for comment or other collaborative work, this can be done by creating a Team channel or shared OneDrive folder or document link. Use of email attachments should be avoided. If sharing documents for comment, ensure that ‘Track Changes’ is turned on. All users should be signed into Microsoft 365 to ensure their name appears next to their comments.

**c. Storing official records**

- The person responsible for day-to-day management of the committee’s official records is to keep a Microsoft Word version of all meeting records in a backed up storage location private to them e.g. OneDrive or a network folder. A Team channel on Microsoft Teams or local storage on a device is not to be used. These measures are in place to protect the integrity of the records.
- Paper records are to be kept in locked storage. If a fireproof cabinet is available, it should be used.

**12. Organising files**

- Meeting records should be organised into folders (electronic and/or manual) so that they are logically structured and easily findable. How files are best ordered depends on the complexity of the committee’s records. Meeting records should be kept in good order at all times.
- If only agenda and minutes exist, it is acceptable to set up subfolders within the folder for each academic year so that agendas are in one folder and minutes are in another folder. Because agenda items are named in minutes, only minutes are kept permanently.
- On the other hand, if the meeting records also contain tabled/circulated documentation or correspondence, it is best to keep all records regarding a meeting in a dedicated folder for that meeting. Fig. 2 shows a possible folder hierarchy for meeting records. It may be adapted.

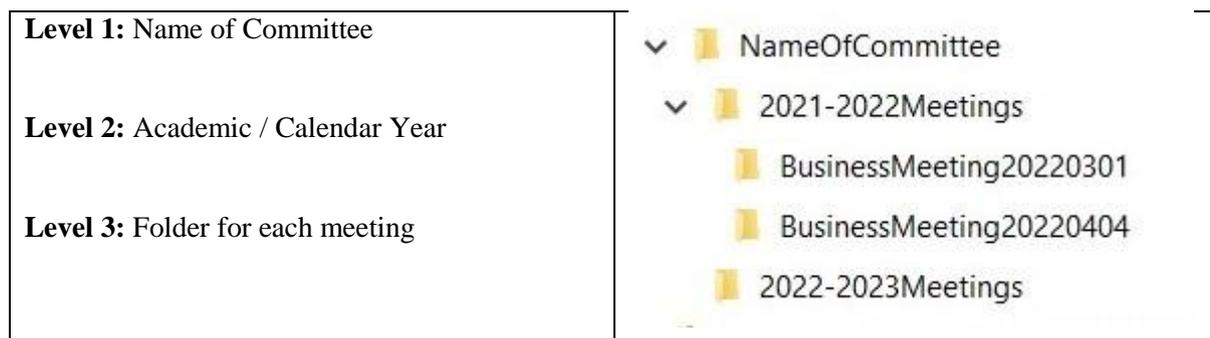


Fig. 2: Possible folder hierarchy for meeting records.

Then, all records relevant to a particular meeting are held inside the folder (see Fig. 3).

 AgendaAGM20220609.docx	The second and third icons represent documents relevant to agenda items 2 and 7. This makes them easily findable. To keep them in order, where numbers form part of file names, give them as 01-09 if there are fewer than ten agenda items, give them as 001 and so forth, if there are more than ten.
 Agendaltem02.docx	
 Agendaltem07.docx	
 DraftMinutesAGM20220609.docx	The minutes are indicated as 'Draft' as the next meeting where they will be approved has not taken place. At that time, the file name will be updated to remove the reference to 'Draft.'

Fig. 3: The content of a folder for a meeting, which took place on 9 June 2022.

### 13. File naming

- It is possible to name files so that they will sort chronologically in folders making it easier to locate specific files. Users will need to be consistent in how they name files to achieve this.
- For example, if all agendas are held in one folder, name the files 'Agenda' + date in the format `yyyymmdd` and they will sort chronologically (see Fig. 4).

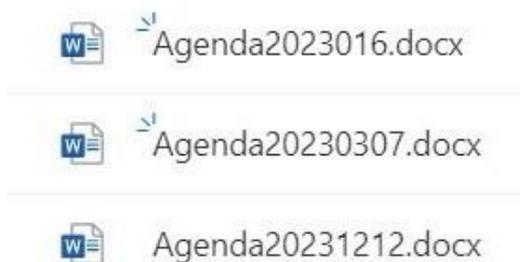


Fig. 4: Files sorted chronologically within a folder.

### 14. Access to meeting records

- Meeting records often contain sensitive or confidential information, and the norm is that access is reserved to members. Some meeting records may be available to further persons or organisations (e.g. Quality Assurance Officer, internal auditor, QAI etc.) for a variety of reasons, but such sharing is a Management function in line with necessity rather than one that committee members should undertake.
- If a report of a meeting is to be made available to a wider audience e.g. all Carlow College staff, the Chairperson is the appropriate person to set up a mechanism to permit this.

Confidential information, including personal data, should be removed prior to such sharing.

### **15. How long should meeting records be kept for?**

- Some meeting records should be kept permanently, particularly the minutes and tabled and circulated documents as held by the person responsible for the official copy of the committee's records. This is either the Chairperson or Secretary.
- Other records are ephemeral and can be destroyed, some of them quickly:
  - Email notifications in reply to meeting invitation can be deleted at will, as can internal room and catering arrangements;
  - Apologies, notes created by the minute taker, and drafts of agendas, minutes and tabled/circulated documents can be destroyed after the approval of the minutes at the next meeting.
- In the case of high-level meetings, it may be considered useful to retain draft minutes etc. for a longer period, however, it should be remembered that such records are potentially accessible via different avenues e.g. discovery, and FOI and data protection requests. The minute taker should be conscious of differences between draft and approved records, and draft records should be kept for a maximum of one year. The minute taker should discuss and agree their practices with the Chairperson, and the general guidance is to destroy records after the approval of minutes at the next meeting.
- Meeting records held by committee members not responsible for the official copy are duplicate and can be destroyed/deleted securely when no longer required.

## Appendix 1.1: Template for Meeting Minutes

The following template provides information to be recorded in minutes in the left-hand column. Guidance notes are in the right-hand column. The following link provides a blank Microsoft Word version of the [TemplateMinutes.docx](#). The template can be edited to suit the requirements of particular committees.

### Minutes of Business Meeting / AGM / EGM etc. of the X Committee

Date of meeting	
Time of meeting	Start and finish times
Location	e.g. name of room; Microsoft Teams
Members present	<p>a. Indicate who the Chairperson, Secretary and minute taker are.</p> <p>b. Indicate if members attend only part of the meeting by listing the number of the agenda items for which they were present e.g. 'John Jones (item 5 only).'</p>
In attendance	<p>Use this if people other than committee members attend.</p> <p>See note b above.</p>
Apologies	Only list the names of those who sent apologies
Quorum	Yes / No
<b>Agenda Items</b>	
1. Approval of minutes of DATE	
2. Matters arising	
3. Correspondence	
4. Name of agenda item	<p>Summary of any documentation and discussions. Record of any decision.</p> <p><b>Follow up action: X to complete a named action by DATE. Highlight or bold any follow up action.</b></p>
5. Name of agenda item	
6. Name of agenda item	
7. Name of agenda item	
8. Any Other Business	
9. Next meeting	Date, time and location
<b>Signature of Chairperson</b>	
Signature of Chairperson	
Date of signature	