
Invest Northern Ireland



Records Management –

Policy & Guidance

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FOREWORD

As Invest NI's Records Management champion I welcome the publication of this updated policy which I would ask everyone to read and digest.

As a government organisation and custodian of sensitive customer and stakeholder information Invest NI has both statutory record keeping responsibilities and a duty of care to manage the information we create or receive in compliance with corporate governance processes.

Good record keeping is a core governance function which has the highest priority for the Executive Leadership team and the Board Audit and Risk Committee. As an organisation which is often closely scrutinised by stakeholders, I am acutely aware of how important it is that the records of our activities and operations are correctly managed.

This policy and guidance are endorsed and championed by both myself and the Executive Leadership Team who share the responsibility for ensuring compliance with records management requirements across the organisation.

Our Transform vision is to be a world leading business development agency. In order to achieve this ambition we need to ensure we have adopted best practice approaches and embedded good governance in relation to how we manage our customer information. Doing this will provide us with accurate and timely data and will support our approach to become a trusted business partner for our customers. Invest NI has made a significant investment in developing its information base, which is used to provide the evidence required for corporate decision making. We are also, increasingly, making this information and its analysis available to our partners and stakeholders in ways which contribute towards enhancing Invest NI's reputation as a knowledge-leading organisation.

In striving to achieve excellence in records management Internal Operations and our Information Coordinators based in teams across the organisation can assist and guide staff to comply with the policy – so, please, if you have any queries about records management do not hesitate to contact them.

Our structured approach to information management and governance is important not only from a compliance perspective but also from an efficiency and customer service perspective. It is therefore in all of our interests that the functionality of our information management infrastructure including Meridio, CRM, OaCMS and Snowdrop, is fully utilised.

I would like to emphasise that all members of staff together with our External Delivery Organisations and contractors delivering programmes and services on our behalf,

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have a responsibility to ensure appropriate records are created, managed and stored in line with this policy at all times.

Alastair Hamilton

Chief Executive

November 2016

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POLICY

1. Aim

The aim of Invest NI's Records Management policy is to support the organisation's business objectives and ensure its statutory obligations are fulfilled.

2. Scope

2.1 The policy applies to all of the types of information generated or processed by Invest NI staff* worldwide as well as the staff of External Delivery Organisations (EDO's) or contractors who deliver customer support activities on behalf of Invest NI

2.2 Invest NI defines a record as information held in any format or on any medium that describes or records an action, event, policy or decision or any occurrences leading to an action, event, policy or decision and which indicate who was involved, the context and the date

*For the purposes of this policy, the term 'staff' refers to those employed or engaged by Invest NI, secondees and other public sector employees working from Invest NI offices on behalf of Invest NI.

3. Implementation

3.1 Invest NI's Records Management policy will be reviewed and updated at periods of not more than three years.

3.2 Invest NI will publish guidance for staff and for External Delivery Organisations and contractors to aid implementation of the policy

3.3 Invest NI will retain its information and records for as long as required to meet its business requirements and statutory obligations [- Public Records Act (Northern Ireland) 1923 and the Disposal of Documents Order 1925]

3.4 The periods of retention and the methods of disposal of different categories of record will be set out in Invest NI's "Retention & Disposal Schedule" as required by statute and as agreed with the Public Record Office of Northern Ireland (PRONI).

3.5 Invest NI will operate and maintain a number of secure electronic information systems ("core systems") in which staff will store all information and records as far as practically and legally possible

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- 3.6 Invest NI will also maintain secure facilities for the storage and management of hardcopy information which legally needs to be retained as hardcopy or which it is not practical to hold electronically.
 - 3.7 Information and records will be stored and classified according to business function and organisational structure
 - 3.8 Records will only be accessed, retained, copied or transferred for approved business reasons
 - 3.9 Information governance legislation will be followed when external organisations or individuals request information or records.
 - 3.10 Information or records will not be transferred outside Invest NI except for approved business reasons and through approved methods
 - 3.11 At the end of specified retention periods records will be reviewed and processed as set out in the Retention & Disposal Schedule
 - 3.12 This policy will be published on Invest NI's intranet and internet sites
 - 3.13 This policy will be supported by information governance policies and procedures as set out in the Information Security Handbook combined with accreditation to the Information Security Management standard, ISO 27001

4. Responsibilities

- 4.1 Staff of Invest NI and of EDO's and contractors who deliver programmes on behalf of Invest NI, will have a personal duty of care for creating, processing, retaining and managing records in line with this Policy
- 4.2 All information and records created or processed by Invest NI staff will belong to Invest NI
- 4.3 All records created or processed by EDO's or by contractors whilst delivering customer support programmes on behalf of Invest NI will belong to the EDO or contractor. However the information those records contain will belong to and will be reported as contractually required to Invest NI.
- 4.4 EDO's and contractors will not use information they have generated whilst delivering Invest NI programmes for their own purposes.
- 4.5 EDO's or contractors will review their records at the end of the retention period stipulated in the Retention & Disposal Schedule. Such records will either be retained for further periods if required or disposed of by the EDO or contractor through an auditable disposal process.

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- 4.6 Line managers and programme sponsors will have responsibility for ensuring staff (whether employed directly or working on behalf of Invest NI under contract) comply with this policy
- 4.7 Line managers and programme managers will arrange for appropriate training in records management to be provided to newly appointed or existing staff, EDOs or contractors
- 4.8 Line managers will be assisted by Information Coordinators recruited from and located in teams throughout the organisation
- 4.9 Invest NI's Accounting Officer (the Chief Executive) will have primary responsibility for corporate adherence to this policy
- 4.10 Day-to-day responsibility for records management policy, procedure and practice will be delegated by the Accounting Officer (the CEO) to:
- Executive Director of Finance and Operations (the Senior Information Risk Owner) to:
 - Head of Internal Operations (the Departmental Security Officer) to
 - Head of Information Management & Governance

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GUIDANCE

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1. INTRODUCTION

1.1 AIM AND SCOPE

This Guidance has been written to inform members of staff* and the staff of External Delivery Organisations (EDOs) and contractors who deliver customer support programmes on behalf of Invest NI, of how Invest NI's Records Management Policy is to be implemented.

This Records Management Policy & Guidance together with the Retention & Disposal Schedule are integral parts of the primary authority for information management & governance policies - the Information Security Handbook.

Full guidance on the engagement and management of EDOs is provided in the External Delivery Organisation Guidance but to summarise whilst EDOs and contractors create and manage their own records, the information that those records contain is owned by and reported to Invest NI as required by individual contracts.

Any Invest NI staff responsible for managing EDOs or contractors must therefore ensure that there is a contractual requirement for information which Invest NI needs during and after contract lifetimes to be reported by the EDO or contractor to Invest NI.

1.2 HISTORY

This document replaces all previous and related policy/guidance documents specifically: Records Management policy V1-6 of October 2011, Email policy of August 2006, Document Scanning policy of April 2013 and External Auditor/Third Party Request for Physical (paper) and Electronic Files of October 2012.

1.3 DEFINITION OF A RECORD

A record is *information held in any format that describes or records an action, event, policy or decision or any occurrences leading to or following an action, event, policy or decision and which indicate who was involved, the context and the date.*

Staff are individually responsible for deciding if the information they manage or process constitutes a record.

2. RECORD STORAGE

2.1 ELECTRONIC

Whilst there are hardcopy exceptions (noted in the Retention & Disposal Schedule) Invest NI's records are primarily stored in the Electronic Document and Record Management System (EDRMS) but they are also stored in other core applications

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(CRM, OaCMS, Oracle and Snowdrop) and in shared drives within Invest NI's infrastructure.

The EDRMS has two distinct record / document storage areas:

- "Customer" fileplan, which holds information about Invest NI's direct one-to-one dealings with customers – client-specific records; and
- "Corporate" Fileplan, which holds information about Invest NI's corporate activities like team, programme or financial management.

Within the EDRMS a document or item can be "declared" as a record when it is finalised/approved or when it is received from outside the EDRMS. Since it then cannot be altered or deleted, the action of declaring a record preserves an item's integrity and provenance and its admissibility as evidence in a court of law should this be needed.

All items held in the Fileplans, whether declared or not, are electronically tagged with information about the item and its history called "metadata". It is an item's metadata that proves the provenance and legal admissibility of an item. Metadata can also be used to find an item and/or its location using the EDRMS search facility.

The default EDRMS settings allow anyone in the organisation to view all items both declared and undeclared but access to documents and folders can be restricted when necessary by item owners, Information Coordinators and by Internal Operations.

Whilst there are exceptions, EDOs and contractors are required to manage and store the electronic information they create on their own IT infrastructure and to dispose of it in line with the Retention & Disposal Schedule or as contractually required.

2.2 HARDCOPY

Some categories of record need to be retained in hardcopy and these are listed in the Retention & Disposal Schedule. The list is not exhaustive and may be extended should additional examples come to light.

When necessary, hardcopy files can be created using the Facilities Management intranet tool.

Hardcopy files are managed through the same retention and disposal process as electronic records, as set out in the Retention & Disposal Schedule.

Hardcopy files are classified by name and assigned unique reference numbers and a master list of the holding of hardcopy files that are stored off-site is available to view via the intranet. Hardcopy files can also be stored locally in Invest NI's HQ building if required and off-site files can be retrieved using the intranet facility.

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The hardcopy records generated by EDOs or contractors belong to those organisations and they alone are responsible for storing them whilst in use and for disposing of them when they are no longer required following the end of the retention period set out in the Retention & Disposal Schedule or as contractually required.

3. RECORDS MANAGEMENT

3.1 RECORD NAMING RULES

Naming rules are necessarily applied to individual records and to both hardcopy files and electronic folders to ensure they can be readily located and identified.

Naming rules ensure consistent practice across the organisation and reduce the possibility of information being lost or misplaced due to inadequate description / incorrect naming. It is therefore essential that staff who create records, files or folders:

- Files or folders must be given names that reflect their content and the folder or the class above must include the period (month, year or span of years) to which they relate.
- **Naming must be consistent:** give each item a unique title, use a title which reflects the record's content and date or period of validity and give similarly structured titles to documents which are subject-linked.
- **Make record names short, but clear and meaningful:** locate the most specific information at the beginning of the title and the most general at the end.
- **Avoid the use of names or words which are only meaningful to a limited number of staff:** e.g. "2012 EOY figures – Coleraine Foods Ltd" uses a widely-recognised acronym and can be easily understood, while "ESQ meeting with Kate (CFL)" would mean little to most staff
- **Avoid repetition, spaces, underscores, special characters or abbreviations such as £ / \$ &.**

3.2 PROTECTIVE MARKING AND VERSION CONTROL

Detailed information about protective marking of documents is provided in Guidance on Protective Marking

Detailed guidance on version control is provided in Guidance on Version Control

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3.3 EMAIL MANAGEMENT

Emails are managed in the same way as any other category of record and it is the responsibility of each member of staff to decide if the emails they send or receive constitute records or not - and therefore if they are to be filed in EDRMS folders or deleted.

An Outlook folder size limit of 200MB has been set to encourage staff based in Northern Ireland to manage emails by deleting them or saving them in the EDRMS - or if of a personal nature, in "K" drives. Staff based outside Northern Ireland or who travel outside Northern Ireland have higher limits to ensure they can communicate whilst remaining fully mobile.

Documents should be sent internally by EDRMS links rather than as attachments. Large or sensitive emails to recipients outside the Invest NI or NICS networks will be sent via the encrypted email application – see the Policy on Sending Information outside Invest NI

3.4 DOCUMENT SCANNING

Regardless of whether or not hardcopy records need to be retained for legal reasons it is Invest NI policy that where practical all original hardcopy documentation and information considered to constitute a record must also be scanned in full and stored within the Corporate or Customer Fileplan.

Copyright law may preclude scanning and storing externally designed/created documents and in these cases staff must consider and/or seek advice on copyright before scanning. Documents commissioned by Invest NI do not fall into this category because Invest NI will contractually own the copyright.

Members of staff who save scanned documents and moved them into the Customer or Corporate Fileplan must be satisfied that the scan is a complete, accurate and legible copy of the original.

3.5 WEBSITES, INTRANET AND MICROSOFT OFFICE 365 SITES

Those staff involved in generating web content will retain records of published material within their segment of the Corporate Fileplan. Likewise controllers of Office 365 sites will ensure appropriate records of shared material is retained in the Fileplan.

3.6 EXTERNAL ACCESS TO RECORDS

Invest NI complies with the requirements of information governance legislation when information is requested by an organisation or individual. The processes to be

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followed are described in these documents: Freedom of Information Manual and Subject Access Request Procedure Manual.

Access to records systems and other information is distinctly different and is closely controlled through: Third Party access to Information Systems Policy and Third Party Data Processing Contract.

It is the responsibility of the Invest NI sponsor of an external body to ensure that body has signed the appropriate agreement(s) and if necessary to arrange access to the appropriate IT system.

4. RECORDS LIFECYCLE

4.1 RECORD RETENTION AND REVIEW PROCESSES

In conjunction with Internal Operations, each Business Area will periodically review their hardcopy and electronic files when the designated retention period has passed. The aim of the review process is to decide whether or not Invest NI needs to continue to retain records past their retention period. This process is described in detail in the Retention & Disposal Schedule.

EDOs and contractors must also examine their electronic and hardcopy records against the same criteria to decide if they need to continue to retain hardcopy or electronic records.

An audit of hardcopy files held in the headquarters building at Bedford Square, Belfast is also undertaken periodically. This exercise is undertaken to reconcile the records of file locations to ensure no file losses have occurred. Teams responsible for any untraceable file will be asked to complete an Information Security Incident report – see Information Security Incident Management policy

4.2 RECORDS DISPOSAL

After the review process has been completed for any set of records, Internal Operations will be solely responsible for approving disposals and for disposing of the organisation's electronic records and hardcopy records.

EDOs and contractors who deliver customer support programmes on behalf of Invest NI are required to ensure that both hardcopy and electronic records are disposed of irretrievably through an auditable process.

The record disposal procedure is designed to:

- prevent the unauthorised or unapproved destruction of records that need to be retained for business and/or legal requirements;

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- identify records worthy of permanent preservation by PRONI
- authorise the destruction of records after a specified period;
- minimise the costs of long-term records storage;
- promote good records management practices
- ensure compliance with legal obligations.

4.3 INFORMAL DOCUMENTATION

Informal documents are non-records created, acquired and/or retained within the organisation and include:

- Hardcopy working papers consisting of rough notes used to assist in the creation of records;
- Hardcopy or electronic drafts or working notes
- Copies of documents or published materials retained for reference

Short-lived/momentary/brief material of this type can be disposed of by staff once it is no longer of use.

Disposal of hardcopy material of this nature is through confidential waste bins in the HQ or through secure waste disposal routes as arranged by each office outside the HQ.

Electronic material of this nature can be deleted from the systems by the author - or if requested by Internal Operations.

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