



Records Management & GDPR

Town Hall Information Session
Geography Building Lecture Theatre
Friday, 11 May 2018

A TRADITION OF
INDEPENDENT
THINKING



UCC

University College Cork, Ireland
Coláiste na hOllscoile Corcaigh

Records Management & GDPR

What is Records Management?

What is UCC doing about Records Management?

How does it help with GDPR?

What is Records Management?

Definition from ISO 15489

records management

field of management responsible for the efficient and systematic control of the creation, receipt, maintenance, use and *disposition* of records, including processes for capturing and maintaining *evidence* of and information about business activities and *transactions* in the form of records

UCC's DRM Project

Context: technical, archival, GDPR

Aims: Consistency, Transparency, Accountability

Phase 1: Scope

Phase 2: Policy, Procedures, Retention schedules

Phases 3/4: Implementation, technical solutions

How can Records Management help with GDPR right now?

Retention schedules (approved, templates)

Basis for controlled destruction (procedure)

Tool for reviewing off-site and legacy records

Model for rearranging structured data and files

Preparation for future creation, retention, disposal

1. Check the Records Retention Schedule for your area

- Approved schedules in place for Finance, HR, OCLA, OVPTL, OVPRI, President's Office, and Development and Alumni Office
- Template retention schedules for colleges, schools, and centres in development
- Retention schedule for common record types (eg, invoices, leave forms)
- Ongoing work in other areas

2. Controlled destruction of older records

- GDPR requires that personal data be retained only as long as necessary for stated purposes
- Retention schedules set retention periods and disposal actions based on business need
- Procedures for controlled, documented, and approved destruction part of RM
- Copy and derivative records and data may be destroyed
- It's ok not to destroy records before 25 May

3. Review legacy and off-site records

- Identify what record series older and off-site records belong to
- Confirm retention period and disposal date
- Prepare lists containing above information
- Be prepared for implementation of RM
- Be able to demonstrate GDPR compliance

4. Re-arrange structured data and files

- GDPR applies to personal data processed automatically or in structured filing systems
- Records series in retention schedules can provide a model for structuring folders within shared directories (eg, NAS, Sharepoint)
- Eg, annual leave records maybe saved in a folder with sub-folders for each year, facilitating regular disposal actions
- Documented deletion demonstrates compliance

5. Prepare for ongoing and improving compliance

- Re-arranging directories and files will aid compliance with RM and GDPR
- Schedules, procedures, and processes will be reviewed during implementation to ensure they are practical, accurate, and effective
- Feedback loop with IT Services, Systems Admin, and each area regarding implementation
- Not all disposal actions may readily be put in place, eg, data on enterprise systems, e-mails

(alternatives: 'archiving', pseudo-/anonymization, access and editing restrictions, logging of processing activities, automated deletion)

And Finally...

- New Records Management website coming soon
- RM questions addressed in GDPR FAQs
- Queries to archives@ucc.ie (Timmy O Connor)
- Questions?
- Thank You