UCC Records Management Framework

Draft Records Destruction Procedure, Jan 2020

Context

UCC's Records Management Policy requires that controlled destruction and deletion of records in line with underlined records retention schedules is carried out on a regular basis. This is necessary to demonstrate compliance, not only with the Records Management Policy, but also with relevant legislation (eg, on data protection), regulation, audit requirements, and best practice.

Disposal actions should be applied to both digital and hard copy records

Disposal actions for University records should occur on a regular basis. It is strongly recommended that each area or unit conduct disposal actions as part of an 'action day' at least once a year. More regular actions, including individual staff performing disposal actions for University digital records in their care, may also be conducted. All formal disposal in line with Schedules must be documented and authorised (see below). Routine deletion of non-master records, eg copies and drafts, does not require authorisation

Purpose

This procedure sets out the steps to be taken when destroying / deleting records which are, according to your retention schedule, liable for destruction. This procedure refers to 'unstructured data' (see definitions) only. Data within enterprise systems (eg, Core, Agresso) is 'structured data' (see definitions) and individual staff members are not responsible for deletion of data from such systems.

Procedure

Step 1: Identify Records Liable for Destruction

Check the records retention schedule for your area to see which records are liable for destruction/deletion

- All staff are responsible for checking that records for which they have responsibility are included in records management processes and actions.
- A designated staff member may coordinate checking and disposal actions, and oversee an 'action day'.
- Records are liable for destruction/deletion where they:
    - are closed,
    - have completed the retention period stated in the schedule, and
    - have a disposal action of 'destroy'

Eg, annual leave records are open for the 'current year' to which they apply, have a retention period of 3 years ('non-current'), and a disposal action of destroy. Therefore, records from 2014-2015 are held as open records until the end of June 2015, non-current records for 2016-18, and should be destroyed from July 2019.

Step 2: List Records Liable for Destruction/Deletion

- Use a Records Destruction Form or Records Destruction spreadsheet (as in use in your area – see samples),

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- complete all required fields (reference code; brief description of content; covering date(s); action date)
- Sign and date the list as 'compiler'

Step 3: Authorise Destruction/Deletion

- All destruction must be authorised in writing by the Data Owner (functional area head, as set out in the retention schedules), *or* by a senior manager designated by them.
- Data Owner/Manager checks, signs, and dates the Destruction Form or Spreadsheet
- The signed forms are maintained securely by the Data Owner/Management, or their administrative support, as records of compliance, liable for inspection and audit

Step 4: Carry out Destruction/Deletion Securely

- Hard copy records must be destroyed by the University's approved confidential shredding service provider (check with the Procurement Office)
- Digital records held as unstructured data, ie, in MS file/folder directories, or Sharepoint sites/libraries, should be deleted by the staff member responsible for those records.
- This staff member overseeing controlled deletion may have been a 'compiler' of a destruction form/spreadsheet, or may be a designated staff member coordinating disposal actions. Controlled deletion **must be documented appropriately**
- **Do not** retain copies of records deleted as part of disposal actions
- All staff with recordkeeping responsibilities are responsible for participating in disposal processes and carrying out disposal actions, including deletion

Supporting Procedures and Guidance

Other Disposal Actions: Review and Archive

- On review, see <Guidance on Review of Records for Disposal>
- The University Archives is working with IT Services and others on storage for digital records of archival value. Once an arrangement is in place, a procedure will be published on transfer of unstructured data of archival value from units/areas to this archival storage. Until then, digital records of archival value are to be maintained on IT Services-supported networks.

For Queries, contact the University Archives (archives@ucc.ie, ext 2753).Where senior staff within your area have been designated to administer records management processes, queries may be brought to that staff member in the first instance.

Definitions

Term	Description
Unstructured Data	All University records, digital and hard copy, managed directly by staff, eg, within filing systems, on network drives, Sharepoint sites/libraries, hard drives
Structured data	Data held within structured systems, eg, Core, Agresso, and is managed by those systems as set up