

# Records Management Policy

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# 1. INTRODUCTION

## 1.1. Purpose

Records Management is essential for successful business operation as it ensures information can be easily accessed, destroyed routinely when no longer needed, and enables us not only to function on a day-to-day basis, but also to fulfil legal requirements.



The aim of Invest NI's Records Management policy is to support the organisation's business objectives whilst ensuring its statutory obligations are fulfilled in respect of life cycle management of records.

## 1.2. Scope

The policy applies to all of the types of records generated or processed by or on behalf of Invest NI worldwide. Appendix A details the policy application in respect of External Delivery Organisations (EDOS).

## 1.3 Definition of a Record

Invest NI defines a Record as information that documents an action made in the transaction of business and which provides evidence of the organisation's functions, activities, decisions, transactions, procedures and policies. This can be created or received by Invest NI and held in any format or medium.

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All records contain information, but not all information is a record. Each individual is responsible for deciding if the information they manage or process constitutes a record.

## **1.4 Implementation**

- 1.4.1 Invest NI will retain its 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.
- 1.4.2 The periods of retention and the methods of disposal of different categories of record are 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).
- 1.4.3 Invest NI operates and maintains 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
- 1.4.4 Invest NI also maintains 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.
- 1.4.5 Information and records are stored and classified according to business function and organisational structure.
- 1.4.6 Records should only be accessed, retained, copied or transferred for approved business reasons.
- 1.4.7 At the end of specified retention periods records will be subject to the processes set out in the Retention & Disposal Schedule.
- 1.4.8 This policy and the Retention & Disposal Schedule will be published on Invest NI's intranet and internet sites.

## **1.5 Responsibilities**

- 1.5.1 Each individual has a personal duty of care for creating, processing, retaining and managing records in line with this Policy.
- 1.5.2 All information and records created or processed on behalf of Invest NI belong to the organisation.
- 1.5.3 Line managers and programme sponsors have responsibility for ensuring staff (whether employed directly or working on behalf of Invest NI under contract) comply with this policy.

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- 1.5.4 Appropriate training in Records Management to be provided to newly appointed Invest NI staff members.
- 1.5.5 Line managers will be assisted by Information Coordinators recruited from and located in teams throughout the organisation.
- 1.5.6 Invest NI Directors & Head of Divisions are designated Information Asset Owners, who have overall responsibility for the management of the records generated by their Business Areas. They are responsible for making sure that a complete record of the business undertaken by their area is captured.
- 1.5.7 Invest NI's Accounting Officer (the Chief Executive (CEO)) will have primary responsibility for corporate adherence to this policy.
- 1.5.8 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)
  - Head of Internal Operations
  - Head of Information Governance
  - The Records Manager
- 1.5.9 The Information Governance ensure legislative requirements are reflected in organisational Records Management policy and procedures and are responsible for communication of these to the wider organisation.

## **2. RECORD STORAGE**

### **2.1 ELECTRONIC**

- 2.1.1 Invest NI's records must be stored in the Enterprise Content Management system (ECM) or in other core applications (CRM, OaCMS, Finance, or the HR System).
- 2.1.2 ECM has two distinct record / document storage areas:
- Customer Sites, which hold information about Invest NI's direct one-to-one dealings with customers – client-specific records; and
  - Corporate Sites, which hold information about Invest NI's corporate activities like communications, HR; team, programme or financial management.
- 2.1.3 Within ECM a document or item can be "declared" a record when it is finalised/approved or when it is received from outside the system. 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.

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- 2.1.4 All items held in ECM, whether declared or not, are electronically tagged with information about the item and its history, known as “metadata”. It is an item’s metadata that proves the provenance and legal admissibility of the item. Metadata can also be used to find an item and/or its location using the ECM search facility.
- 2.1.5 A “Need to Know” security model has been deployed in ECM to ensure that staff have access only to the information they require to do their job. By default, this security model is set at divisional level for Corporate Sites, with certain locations restricted to a smaller user group due to the sensitive nature of the information they hold. Access to Customer Sites is controlled by the CRM and restricted to the division which manages the customer, plus any other divisions requiring access on a temporary basis determined by the duration of the specific interaction. A fully auditable request and approval process is used within ECM to grant then remove exceptional access required over and above the scenarios described above.

## **2.2 HARDCOPY**

- 2.2.1 Some categories of record need to be retained in hardcopy, and these are listed in Appendix B. This list is not exhaustive and may be extended should additional examples come to light.
- 2.2.2 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.
- 2.2.3 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 for physical file management.
- 2.2.4 Regardless of whether hardcopy records need to be retained 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 relevant area of ECM.
- 2.2.5 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.
- 2.2.6 Individuals who save scanned documents and moved them into ECM must be satisfied that the scan is a complete, accurate and legible copy of the original.

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## RECORDS MANAGEMENT

### 3.1 RECORD NAMING RULES

- 3.1.1 It is necessary to apply naming rules to individual records and to both hardcopy files and electronic folders to ensure they can be readily located and identified.
- 3.1.2 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 individuals who create records, files or folders follow the naming rules below:
- Documents or folders must be given names that reflect their content. The folder structure in ECM should clearly indicate **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.
  - **Electronic records must not be filed to ECM without a meaningful title** – default names such as 'Document 1', 'Book 1' or 'No Subject' must be amended before the item is filed.
  - **Avoid using generic folder names** such as "Stuff", "Miscellaneous", "General" etc.
  - **Avoid the use of names or words which are only meaningful to a limited number of staff:** e.g. "2022 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 £ / \$ &.**
  - **Avoid basing names on your ownership of the record**, e.g. "Joe Bloggs' documents" or "Joe Bloggs' emails".

### 3.2 PROTECTIVE MARKING AND VERSION CONTROL

- 3.2.1 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". Both these documents are available on the intranet.

### 3.3 MAILBOX MANAGEMENT

- 3.3.1 Emails are managed in the same way as any other category of record and it is the responsibility of each individual to decide if the emails they send or receive

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constitute records or not - and therefore if they are to be filed in ECM or deleted.

3.3.2 An Outlook folder size limit of 500MB has been set to encourage management of emails. Individuals can ensure they do not exceed this limit by choosing to delete emails them or save them to ECM, whichever is appropriate.

3.3.3 To save mailbox space documents should be sent internally by ECM links rather than as attachments.

### **3.4 WEBSITES, INTRANET**

3.4 Those teams involved in generating web content will retain records of published material within their divisional Corporate Site.

## **4. RECORDS LIFE CYCLE**

### **4.1 RECORD RETENTION AND REVIEW PROCESSES**

4.1.1 In conjunction with the Information Governance Team, each Business Area will review their hardcopy and electronic files when the designated retention period has passed. The aim of the review process is to authorise the disposal of content past retention, with further retention only permissible in exceptional circumstances. This process is described in detail in the Retention & Disposal Schedule.

4.1.2 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**

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

4.2.2 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
- 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

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- ensure compliance with legal obligations.

### **4.3 INFORMAL DOCUMENTATION**

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

- Handwritten meeting notes or other types of aide memoire. If a record of the notes needs to be retained these should be added to CRM or filed to ECM and the appropriate retention label applied.
- Microsoft (MS) Teams messages are retained in line with the MS Teams ICT Policy which is 3 months. If staff wish to retain these for a longer retention period, the chat should be filed to ECM and the appropriate retention label applied.
- Calendar items.

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

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

4.3.4 Electronic material of this nature which does not meet the definition of a record can be deleted from ECM once there is no further business need to keep it.

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## **Appendix A**

### **External Delivery Organisations (EDOs) / Contractors**

#### **1. Context**

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 will be 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.

#### **2. Responsibilities**

EDOs and contractors who deliver programmes on behalf of Invest NI, will have a duty of care for creating, processing, retaining and managing records in line with this Policy

All records created or processed by EDOs or by contractors whilst delivering services 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. EDOs and contractors will not use information they have generated whilst delivering Invest NI programmes for their own purposes.

#### **3. Record Storage**

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.

#### **4. Hardcopy**

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.

#### **5. Record Retention & Review Process**

EDOs or contractors will review their records of delivery of services for Invest NI at the end of the relevant 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.

#### **6. Record Disposal**

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

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## Appendix B

### Hard Copy Records Listing

Categories of record needing to be retained in hardcopy:

- All contracts and deeds not signed electronically (note: deeds cannot be signed electronically)
- All contractual documentation relating to a property transaction (including leases)
- All documentation relating to property title
- All finance documents such as loan agreements, charges, facility agreements, mortgages and other forms of security
- Any documentation containing an original seal
- Any documentation creating a trust or amending its terms and documentation created during the creation of a trust (e.g. declarations, due diligence records, questionnaires)
- Any documentation in respect of which litigation or criminal proceedings are likely, suspected or contemplated or where proceedings have been issued
- Any documentation stamped by a government body
- Company books including the Registers of: Shareholders, Directors and Secretaries, Directors' interests & Charges
- Contracts of employment
- Guarantees
- Hard copy letters of offer (where not signed electronically)
- Invest NI's Register of Seals
- Material protected by copyright
- Original hardcopy documentation not belonging to Invest Northern Ireland
- Share certificates

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2.0	Nigel McClelland	Steve Chambers	August 2019	Minor updates
3.0	Brona Anderson	Steve Chambers	September 2022	Minor update.
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