**Records Retention and**

**Protection Policy**

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##### Introduction

## Risks Addressed

This document describes a control that was identified in [ISMS06004 Information Security Risk Treatment Plan](file:///C:\Users\Umar%20Farouk\06.%20Planning\ISMS06004%20Information%20Security%20Risk%20Treatment%20Plan.doc) to address the following risks:

|  |  |
| --- | --- |
| **Reference** | **Description of Risk** |
|  |  |
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## Scope

This control applies to all systems, people and processes that constitute the organisation’s information systems, including board members, directors, employees, suppliers and other third parties who have access to the Project Management Office (PMO) systems.

## Related Documents

The following policies and procedures are relevant to this document:

* [ISMS14001 Information Asset Inventory](file:///C:\Users\Umar%20Farouk\A8.%20Asset%20management\ISMS14001%20Information%20Asset%20Inventory.xls)
* [ISMS14002 Information Security Classification Guidelines](file:///C:\Users\Umar%20Farouk\A8.%20Asset%20management\ISMS14002%20Information%20Security%20Classification%20Guidelines.doc)
* [ISMS14003 Information Security Labelling Procedure](file:///C:\Users\Umar%20Farouk\A8.%20Asset%20management\ISMS14003%20Information%20Security%20Labelling%20Procedure.doc)
* [ISMS14006 Procedure for the Disposal of Media](file:///C:\Users\Umar%20Farouk\A8.%20Asset%20management\ISMS14006%20Procedure%20for%20the%20Disposal%20of%20Media.doc)

## Purpose

In its everyday business operations, the Nigeria Customs Service collects and stores records of many types and in a variety of different formats. The relative importance and sensitivity of these records also varies and is subject to the Service’s security classification scheme (see [ISMS14002 Information Security Classification Guidelines](file:///C:\Users\Umar%20Farouk\A8.%20Asset%20management\ISMS14002%20Information%20Security%20Classification%20Guidelines.doc)).

It is important that these records are protected from loss, destruction, falsification, unauthorised access and unauthorised release and range of controls are used to ensure this, including backups, access control and encryption.

The Nigeria Customs Service also has a responsibility to ensure that it complies with all relevant legal, regulatory, and contractual requirements in the collection, storage, retrieval and destruction of records.

# Records Retention and Protection Policy

This policy begins by establishing the main principles that must be adopted when considering record retention and protection. It then sets out the types of records held by the Nigeria Customs Service and their general requirements before discussing record protection, destruction, and management.

## General Principles

There are several key general principles that should be adopted when considering record retention and protection policy. These are:

* Records should be held in compliance with all applicable legal, regulatory, and contractual requirements.
* Records should not be held for any longer than required.
* The protection of records in terms of their confidentiality, integrity and availability should be in accordance with their security classification.
* Records should always remain retrievable in line with business requirements.

A summary of the specific requirements of the Nigeria Data Protection Regulation can be found in [ISMS24001 Legal Responsibilities Policy](file:///C:\Users\Umar%20Farouk\Downloads\ISMS24001%20Legal%20Responsibilities%20Policy.doc).

## Record Types and Guidelines

To assist with the definition of guidelines for record retention and protection, records held by the Nigeria Customs Service are grouped into the categories listed in the table on the following page. For each of these categories, the required or recommended retention period and allowable storage media are also given, together with a reason for the recommendation or requirement.

Note that these are guidelines only and there may be specific circumstances where records need to be kept for a longer or shorter period of time. This should be decided on a case-by-case basis as part of the design of the information security elements of new or significantly changed processes and services.

Further information about records held by the Service, including their security classifications and owners can be found in [ISMS14001 Information Asset Inventory](file:///C:\Users\Umar%20Farouk\A8.%20Asset%20management\ISMS14001%20Information%20Asset%20Inventory.xls).

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Record Category** | **Description** | **Retention Period** | **Reason for Retention Period** | **Allowable Storage Media** |
| Accounting | Invoices, purchase orders, accounts and other historical financial records | x years | SOX compliance requirement | Electronic only – paper records must be scanned |
| Budgeting and Forecasting | Forward-looking financial estimates and plans | x years | SOX compliance requirement | Electronic/Paper |
| System Transaction Logs | Database journals and other logs used for database recovery | x weeks | Based on backup and recovery strategy | Electronic/tape media |
| Audit Logs | Security logs e.g. records of logon/logoff and permission changes | x months | Maximum period of delay before forensic investigation | Electronic |
| Operational Procedures | Records associated with the completion of operational procedures | x years | Maximum period of time elapsed regarding dispute | Electronic/Paper |
| Licensed Agents | Customer names, addresses, order history, credit card and bank details | x years after last purchase | Data Protection Act requirement | Electronic/Paper |
| Human resources | Employee names, addresses, bank details, tax codes, employment history | x years after end of employment | Data Protection Act requirement; Employment law | Electronic/Paper |
| Contractual | Legal contracts, terms and conditions, leases | x years after contract end | Maximum period within which dispute might occur | Electronic/Paper |
| Further categories |  |  |  |  |

*Table 1 – Record types and retention periods*

## Use of Cryptography

Where appropriate to the classification of information and the storage medium, cryptographic techniques should be used to ensure the confidentiality and integrity of records.

Care should be taken to ensure that encryption keys used to encrypt records are securely stored for the life of the relevant records and comply with the Service’s policy on cryptography (see [ISMS16001 Cryptographic Policy](file:///C:\Users\Umar%20Farouk\A10.%20Cryptography\ISMS16001%20Cryptographic%20Policy.doc)).

## Media Selection

The choice of long-term storage media should consider the physical characteristics of the medium and the length of time it will be in use.

Where records are legally (or practically) required to be stored on paper, adequate precautions must be taken to ensure that environmental conditions remain suitable for the type of paper used. Where possible, backup copies of such records should be taken by methods such as scanning. Regular checks should be made to assess the rate of deterioration of the paper and action taken to preserve the records if required.

For records stored on electronic media such as tape, similar precautions must be taken to ensure the longevity of the materials, including correct storage and copying onto more robust media if necessary. The ability to read the contents of the particular tape (or other similar media) format should be maintained by the keeping of a device capable of processing it. If this is impractical an external third party may be employed to convert the media onto an alternative format.

## Record Retrieval

There is little point in retaining records if they are not able to be accessed in line with business or legal requirements. The choice and maintenance of record storage facilities should ensure that records can be retrieved in a usable format within an acceptable period of time. An appropriate balance should be struck between the cost of storage and the speed of retrieval so that the most likely circumstances are adequately catered for.

## Record Destruction

Once records have reached the end of their life according to the defined policy, they should be securely destroyed in a manner that ensures that they can no longer be used in line with [ISMS14006 Procedure for the Disposal of Media](file:///C:\Users\Umar%20Farouk\A8.%20Asset%20management\ISMS14006%20Procedure%20for%20the%20Disposal%20of%20Media.doc).

This procedure allows for the correct recording of the details of disposal which should be retained as evidence.

## Record Review

The retention and storage of records should be subject to a regular review process carried out under the guidance of management to ensure that:

* The policy on records retention and protection remains valid
* Records are being retained according to the policy
* Records are being securely disposed of when no longer required
* Legal, regulatory and contractual requirements are being fulfilled
* Processes for record retrieval are meeting business requirements

The results of these reviews should be recorded.