Records Management Policy

Document Metadata

Company: Atlas Systems Group

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Approved By: Executive Leadership Team (ELT)

Applies To: All employees, contractors, and temporary workers unless stated otherwise

Policy Precedence: Corporate Governance Policy governs conflicts; stricter control applies unless an exception is approved

Note for AI ingestion: Sections are numbered consistently; key terms are repeated with controlled variation to support semantic retrieval with sentence-transformer embeddings. Exceptions and conflicts are explicit to enable benchmarking of conflict resolution behaviors.

Records Management Policy — Section 1.0

1.1 Topic: Records definition and ownership

Purpose. This section defines expectations for records definition and ownership within Atlas Systems Group. It aims to reduce operational risk, improve consistency, and clarify approvals, responsibilities, and timelines.

Scope. Unless a narrower scope is stated, this section applies to employees and contractors using company systems, data, facilities, or representing the company in any capacity.

1.2 Responsibilities

- **Employees:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.

- **People Ops:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.

- **IT:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.

- **Security:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.

1.3 Controls and Procedures

Control level is **Low**. Required actions must be completed within 5 business days. Evidence should be stored in the approved repository for auditability.

Approvals must be obtained before the action is taken when spend, access, or people-impact thresholds are met. Use the standard request form and include business justification, risks, and alternatives considered.

Exceptions are allowed only when documented and time-bounded. Compensating controls must reduce residual risk to an acceptable level.

1.4 Conflicts, Exceptions, and Edge Cases

Policy Interaction: HR Retention: Employee personnel records are retained for 7 years after separation.

- If a customer contract requires stronger controls than this policy, the contract requirement applies and must be recorded as a contractual obligation.

- If local law conflicts with this policy, Legal & Compliance determines the compliant path and records the decision.

1.5 Example Scenario

Scenario 1: A manager requests an action related to *records definition and ownership*. The requester provides incomplete justification. The approver rejects the request, asks for risk analysis, and records the decision. If the request is urgent, a time-bounded exception is created with compensating controls and a review date.

Records Management Policy — Section 2.0

2.1 Topic: Storage standards and repositories

Purpose. This section defines expectations for storage standards and repositories within Atlas Systems Group. It aims to reduce operational risk, improve consistency, and clarify approvals, responsibilities, and timelines.

Scope. Unless a narrower scope is stated, this section applies to employees and contractors using company systems, data, facilities, or representing the company in any capacity.

2.2 Responsibilities

- **People Ops:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.

- **IT:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.

- **Security:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.

- **Finance:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.

2.3 Controls and Procedures

Control level is **Medium**. Required actions must be completed within 2 business days. Evidence should be stored in the approved repository for auditability.

Approvals must be obtained before the action is taken when spend, access, or people-impact thresholds are met. Use the standard request form and include business justification, risks, and alternatives considered.

Exceptions are allowed only when documented and time-bounded. Compensating controls must reduce residual risk to an acceptable level.

2.4 Conflicts, Exceptions, and Edge Cases

- If local law conflicts with this policy, Legal & Compliance determines the compliant path and records the decision.

- If an employee requires an accommodation, People Ops coordinates an interactive process; documentation is limited to what is necessary.

2.5 Example Scenario

Scenario 2: A manager requests an action related to *storage standards and repositories.* The requester provides incomplete justification. The approver rejects the request, asks for risk analysis, and records the decision. If the request is urgent, a time-bounded exception is created with compensating controls and a review date.

Records Management Policy — Section 3.0

3.1 Topic: Retention schedules (key categories)

Purpose. This section defines expectations for retention schedules (key categories) within Atlas Systems Group. It aims to reduce operational risk, improve consistency, and clarify approvals, responsibilities, and timelines.

Scope. Unless a narrower scope is stated, this section applies to employees and contractors using company systems, data, facilities, or representing the company in any capacity.

3.2 Responsibilities

- **IT:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.

- **Security:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.

- **Finance:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.

- **Legal & Compliance:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.

3.3 Controls and Procedures

Personnel records are retained for 7 years after separation unless a longer statutory requirement applies.

Records owners must store official copies in approved repositories; email is not the system of record unless designated.

If another policy suggests a shorter retention period for the same record category, this policy governs the official record schedule unless Legal approves a deviation.

3.4 Conflicts, Exceptions, and Edge Cases

Policy Interaction: HR Retention: Employee personnel records are retained for 7 years after separation.

- If an employee requires an accommodation, People Ops coordinates an interactive process; documentation is limited to what is necessary.

- If systems are unavailable, follow the manual fallback procedure and document actions retroactively within 1 business day.

3.5 Example Scenario

Scenario 3: A manager requests an action related to *retention schedules (key categories)*. The requester provides incomplete justification. The approver rejects the request, asks for risk analysis, and records the decision. If the request is urgent, a time-bounded exception is created with compensating controls and a review date.

Records Management Policy — Section 4.0

4.1 Topic: Email and chat records handling

Purpose. This section defines expectations for email and chat records handling within Atlas Systems Group. It aims to reduce operational risk, improve consistency, and clarify approvals, responsibilities, and timelines.

Scope. Unless a narrower scope is stated, this section applies to employees and contractors using company systems, data, facilities, or representing the company in any capacity.

4.2 Responsibilities

- **Security:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.

- **Finance:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.

- **Legal & Compliance:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.

- **Managers:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.

4.3 Controls and Procedures

Control level is **Critical**. Required actions must be completed immediately ($\leq$ 1 hour). Evidence should be stored in the approved repository for auditability.

Approvals must be obtained before the action is taken when spend, access, or people-impact thresholds are met. Use the standard request form and include business justification, risks, and alternatives considered.

Exceptions are allowed only when documented and time-bounded. Compensating controls must reduce residual risk to an acceptable level.

4.4 Conflicts, Exceptions, and Edge Cases

- If systems are unavailable, follow the manual fallback procedure and document actions retroactively within 1 business day.

- If a customer contract requires stronger controls than this policy, the contract requirement applies and must be recorded as a contractual obligation.

4.5 Example Scenario

Scenario 4: A manager requests an action related to *email and chat records handling*. The requester provides incomplete justification. The approver rejects the request, asks for risk analysis, and records the decision. If the request is urgent, a time-bounded exception is created with compensating controls and a review date.

Records Management Policy — Section 5.0

5.1 Topic: Litigation holds and suspending deletion

Purpose. This section defines expectations for litigation holds and suspending deletion within Atlas Systems Group. It aims to reduce operational risk, improve consistency, and clarify approvals, responsibilities, and timelines.

Scope. Unless a narrower scope is stated, this section applies to employees and contractors using company systems, data, facilities, or representing the company in any capacity.

5.2 Responsibilities

- **Finance:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.

- **Legal & Compliance:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.

- **Managers:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.

- **Employees:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.

5.3 Controls and Procedures

Control level is **Low**. Required actions must be completed within 5 business days. Evidence should be stored in the approved repository for auditability.

Approvals must be obtained before the action is taken when spend, access, or people-impact thresholds are met. Use the standard request form and include business justification, risks, and alternatives considered.

Exceptions are allowed only when documented and time-bounded. Compensating controls must reduce residual risk to an acceptable level.

5.4 Conflicts, Exceptions, and Edge Cases

Policy Interaction: HR Retention: Employee personnel records are retained for 7 years after separation.

- If a customer contract requires stronger controls than this policy, the contract requirement applies and must be recorded as a contractual obligation.

- If local law conflicts with this policy, Legal & Compliance determines the compliant path and records the decision.

5.5 Example Scenario

Scenario 5: A manager requests an action related to *litigation holds and suspending deletion*. The requester provides incomplete justification. The approver rejects the request, asks for risk analysis, and records the decision. If the request is urgent, a time-bounded exception is created with compensating controls and a review date.

Records Management Policy — Section 6.0

6.1 Topic: Disposition and secure destruction

Purpose. This section defines expectations for disposition and secure destruction within Atlas Systems Group. It aims to reduce operational risk, improve consistency, and clarify approvals, responsibilities, and timelines.

Scope. Unless a narrower scope is stated, this section applies to employees and contractors using company systems, data, facilities, or representing the company in any capacity.

6.2 Responsibilities

- **Legal & Compliance:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.

- **Managers:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.

- **Employees:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.

- **People Ops:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.

6.3 Controls and Procedures

Control level is **Medium**. Required actions must be completed within 2 business days. Evidence should be stored in the approved repository for auditability.

Approvals must be obtained before the action is taken when spend, access, or people-impact thresholds are met. Use the standard request form and include business justification, risks, and alternatives considered.

Exceptions are allowed only when documented and time-bounded. Compensating controls must reduce residual risk to an acceptable level.

6.4 Conflicts, Exceptions, and Edge Cases

- If local law conflicts with this policy, Legal & Compliance determines the compliant path and records the decision.

- If an employee requires an accommodation, People Ops coordinates an interactive process; documentation is limited to what is necessary.

6.5 Example Scenario

Scenario 6: A manager requests an action related to *disposition and secure destruction*. The requester provides incomplete justification. The approver rejects the request, asks for risk analysis, and records the decision. If the request is urgent, a time-bounded exception is created with compensating controls and a review date.

Records Management Policy — Section 7.0

7.1 Topic: Access controls for sensitive records

Purpose. This section defines expectations for access controls for sensitive records within Atlas Systems Group. It aims to reduce operational risk, improve consistency, and clarify approvals, responsibilities, and timelines.

Scope. Unless a narrower scope is stated, this section applies to employees and contractors using company systems, data, facilities, or representing the company in any capacity.

7.2 Responsibilities

- **Managers:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.

- **Employees:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.

- **People Ops:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.

- **IT:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.

7.3 Controls and Procedures

Control level is **High**. Required actions must be completed within 24 hours. Evidence should be stored in the approved repository for auditability.

Approvals must be obtained before the action is taken when spend, access, or people-impact thresholds are met. Use the standard request form and include business justification, risks, and alternatives considered.

Exceptions are allowed only when documented and time-bounded. Compensating controls must reduce residual risk to an acceptable level.

7.4 Conflicts, Exceptions, and Edge Cases

- If an employee requires an accommodation, People Ops coordinates an interactive process; documentation is limited to what is necessary.

- If systems are unavailable, follow the manual fallback procedure and document actions retroactively within 1 business day.

7.5 Example Scenario

Scenario 7: A manager requests an action related to *access controls for sensitive records*. The requester provides incomplete justification. The approver rejects the request, asks for risk analysis, and records the decision. If the request is urgent, a time-bounded exception is created with compensating controls and a review date.

Records Management Policy — Section 8.0

8.1 Topic: Audit readiness and sampling

Purpose. This section defines expectations for audit readiness and sampling within Atlas Systems Group. It aims to reduce operational risk, improve consistency, and clarify approvals, responsibilities, and timelines.

Scope. Unless a narrower scope is stated, this section applies to employees and contractors using company systems, data, facilities, or representing the company in any capacity.

8.2 Responsibilities

- **Employees:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.

- **People Ops:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.

- **IT:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.

- **Security:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.

8.3 Controls and Procedures

Control level is **Critical**. Required actions must be completed immediately ($\leq$ 1 hour). Evidence should be stored in the approved repository for auditability.

Approvals must be obtained before the action is taken when spend, access, or people-impact thresholds are met. Use the standard request form and include business justification, risks, and alternatives considered.

Exceptions are allowed only when documented and time-bounded. Compensating controls must reduce residual risk to an acceptable level.

8.4 Conflicts, Exceptions, and Edge Cases

- If systems are unavailable, follow the manual fallback procedure and document actions retroactively within 1 business day.

- If a customer contract requires stronger controls than this policy, the contract requirement applies and must be recorded as a contractual obligation.

8.5 Example Scenario

Scenario 8: A manager requests an action related to *audit readiness and sampling*. The requester provides incomplete justification. The approver rejects the request, asks for risk analysis, and records the decision. If the request is urgent, a time-bounded exception is created with compensating controls and a review date.

Records Management Policy — Section 9.0

9.1 Topic: Exceptions and conflicts with other schedules

Purpose. This section defines expectations for exceptions and conflicts with other schedules within Atlas Systems Group. It aims to reduce operational risk, improve consistency, and clarify approvals, responsibilities, and timelines.

Scope. Unless a narrower scope is stated, this section applies to employees and contractors using company systems, data, facilities, or representing the company in any capacity.

9.2 Responsibilities

- **People Ops:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.

- **IT:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.

- **Security:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.

- **Finance:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.

9.3 Controls and Procedures

Control level is **Low**. Required actions must be completed within 5 business days. Evidence should be stored in the approved repository for auditability.

Approvals must be obtained before the action is taken when spend, access, or people-impact thresholds are met. Use the standard request form and include business justification, risks, and alternatives considered.

Exceptions are allowed only when documented and time-bounded. Compensating controls must reduce residual risk to an acceptable level.

9.4 Conflicts, Exceptions, and Edge Cases

- If a customer contract requires stronger controls than this policy, the contract requirement applies and must be recorded as a contractual obligation.

- If local law conflicts with this policy, Legal & Compliance determines the compliant path and records the decision.

9.5 Example Scenario

Scenario 9: A manager requests an action related to *exceptions and conflicts with other schedules*. The requester provides incomplete justification. The approver rejects the request, asks for risk analysis, and records the decision. If the request is urgent, a time-bounded exception is created with compensating controls and a review date.