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| Document ID  **ITAD102** | Title  **IT RECORDS MANAGEMENT** | Print Date  **mm/dd/yyyy** |
| Revision  **0.0** | Prepared By  **Preparer’s Name / Title** | Date Prepared  **mm/dd/yyyy** |
| Effective Date  **mm/dd/yyyy** | Reviewed By  **Reviewer’s Name / Title** | Date Reviewed  **mm/dd/yyyy** |
|  | Approved By  **Final Approver’s Name / Title** | Date Approved  **mm/dd/yyyy** |

**Policy:** Organize and manage Information Technology records in a way that demonstrates controlled, consistent, and effective operations and conformance to specified requirements.

**Purpose:** To manage Information Technology records consistently and efficiently, ensuring safety, availability, accountability, and security of authorized access.

**Scope:** This procedure applies to all records managed by Information Technology, both in hard copy and electronic form.

**Responsibilities:**

Information Technology Managers is responsible for reviewing classification and retention of records, reviewing record obsolescence, conducting internal audits of the Records Management System, and ensuring that corrective actions prescribed by audits are taken.

The Information Technology Storage Librarian is responsible for maintaining Company records, maintaining a records log, and purging or physically destroying records.

The Tech Support Manager is responsible for updating storage medium and format of records when they are still required but in danger of becoming inaccessible.

Top Management is responsible for developing and approving a records classification and retention guide.

All Employees are responsible for ensuring records they generate and use are timely, accurate, and complete and are kept in the appropriate records store or database.

**Definitions:** Active – Currently in use; used in the conduct of current business. Active records are often referred to as “production” records.

Archive – Offline storage of records (onto backup tapes, floppy disks, optical disks, etc.); files containing data that are no longer in current use but are kept in long-term storage for possible future needs (to fulfill legal requirements, for instance).

Document – Information and its supporting medium (paper, magnetic, electronic, optical, photograph, or sample). A document is an object commonly found in office systems (a spreadsheet, word processing document, database, etc.), whereas a record is a document that provides evidence of a particular business activity.

Record – In Information Technology, a record is a data structure aggregating several items of possibly different types. The items being aggregated are called fields and are usually identified or indexed by field labels.

Generally, a record is data or information of any kind and in any form, created or received and accumulated by an organization in the course of conducting business and subsequently kept as “evidence of activity” through incorporation into a recordkeeping system.

**Procedure:**

### 1.0 Identification of Records

1.1 The Company requires documentation for every aspect of its business, to comply with regulations (see Reference A) and/or standards (see References B and C).

1.2 Each department or functional group within the Company is responsible for maintaining adequate records, to demonstrate and promote effective and efficient operations and to provide a clear audit trail.

1.3 The Information Technology Department shall use a standard classification scheme for all records.

* ITAD102-1 RECORDS CLASSIFICATION AND RETENTION GUIDE should provide a complete list of record types, stores, and retention periods. It shall be updated immediately upon adding a new record class or revising or dropping an existing record class.
* This classification scheme should be reviewed by Information Technology Managers on a regular basis to further ensure its consistency, currency, and usefulness.

### 2.0 Record Generation

2.1 The Information Technology Storage Librarian shall be responsible for maintaining all Company records in a safe and secure location and shall maintain a log (, index, catalog, etc.) of all records, indicating (at a minimum) the date of origin, the originator, record name, record ID, retention period, location, revision number, and revision date. ITAD102-2 RECORD MANAGEMENT DATABASE may be used as a guide.

2.2 Written records must be completed in ink to help ensure legibility and protect them from unauthorized change. Changes or corrections to written records should be made with a single line through the incorrect entry, dated and initialed by the person making the change. Correction fluid or tape must never be used. All employees making changes to written records must be authorized by their department managers, at a minimum.

2.3 Electronic records shall be maintained in a manner that prevents loss or alteration, ensures security, and optimizes record generation, maintenance, tracking, and retrieval, in accordance with ITSD103 Information Technology MEDIA STORAGE.

* Record access and update privileges shall be restricted, in accordance with ITSD106 Information Technology ACCESS CONTROL.
* Original records and any revisions must be kept for a specified total retention period, to be agreed upon by Top Management and Information Technology Managers and spelled out in ITAD102-1 RECORDS CLASSIFICATION AND RETENTION GUIDE. Records shall be differentiated by unique identifiers, unique version or revision ID’s, and/or date of entry.

2.4 The total retention period for any record will be the sum of its active and archive periods.

* Every data store should have an “active” set and an “archive” counterpart to optimize search efficiency and make the most efficient use of space.
* Every record type must have an archival date, agreed upon by Information Technology Managers and management of the department producing that record.
* Every revision/update must reference, or point to, its predecessor, so that each record revision may be traced back to its original.

### 3.0 Record MaNAGEMENT

3.1 The department or authority associated with a particular type of record (usually the entity generating that record) is responsible for ensuring that records are maintained in a manner that protects them from damage, deterioration, theft, or other loss.

* The department (authority) generating an electronic type of record is responsible for working with the Information Technology Department to ensure record safety.

3.2 Methods used to prevent loss of records in hard copy form may include storing in a controlled environment, strict access control, and auditing record stores.

* Electronic records must be protected from damage, deterioration, loss, or unauthorized change, in accordance with procedure ITSD103 Information Technology MEDIA STORAGE.

3.3 Active records (those that have not reached the end of their active retention period) must be stored in such a way that they are readily retrievable.

* Inactive Information Technology records – those that have reached the end of their active retention period but have not reached the end of their ***total*** retention period – should be ***archived***. Archived records must be retrievable within a reasonable time frame; the Company is not required to make archived records readily available.
  1. Unless otherwise indicated, the Information Technology Storage Librarian shall electronically purge or physically destroy records at the end of their total retention period. Management of the department responsible for generating records shall also be responsible for knowing which records are to be purged/destroyed and when.

If records must be kept beyond their total retention period, department management shall give a full explanation, in writing, why those records must be maintained beyond their normal retention period:

* It is aware of, and consents to, destruction of records; or
* It shall give a full explanation (justification) for why records must be retained.

### 4.0 TECHNOLOGY OBSOLESCENCE

4.1 Technology obsolescence is the result of technological evolution. As new media for storing digital information rapidly replace older media, devices, applications, etc., for reading these older media become unavailable. Newer versions of software constantly render older versions obsolete and the hardware required by this software also changes over time. Consequently, information which relies on obsolete technologies becomes inaccessible.

4.2 The Information Technology Storage Librarian shall periodically review the archived records log and submit a report to Information Technology Managers on all records archived prior to the last such review.

4.3 Information Technology Managers shall determine which archived records are still required and which are in danger of becoming inaccessible (need to be moved to a different medium, format, etc.). Information Technology Managers shall determine the method and resources needed to ensure continued accessibility of those records and shall delegate the task of updating those records to the Tech Support Manager.

4.4 The Tech Support Manager shall update archives, as needed, and report to Information Technology Managers and the Information Technology Storage Librarian when the task is complete. The Tech Support Manager shall supply information needed to update the archive log to the Information Technology Storage Librarian.

### 5.0 RecordS AUDIT

5.1 Information Technology Managers (or its designee) shall conduct an internal audit of the Records Management System on an irregular basis, to ensure Company records continue to be accessible, have integrity, and continue to meet Company and legal requirements. A third-party audit of the Records Management System shall be conducted periodically (once every two years is recommended).

5.2 If any audit finds a nonconformity in the Records Management System, Information Technology Managers (or its designee) shall take corrective action and update the system accordingly. Within one month of taking corrective action, the auditor shall verify that the corrective action was taken, that it yielded the expected results, and that the system has been updated.

**Forms:**

* ITAD102-1 RECORDS CLASSIFICATION AND RETENTION GUIDE
* ITAD102-2 RECORDS MANAGEMENT DATABASE

**References:**

1. **SARBANES-OXLEY ACT OF 2002**

The Sarbanes-Oxley Act, passed by the U.S. Congress in 2002, is designed to prevent publicly-held companies that conduct business in the U.S.A. from manipulating, losing, or destroying records, regardless of the form those records take. It is crucial for such an organization to develop and execute a records management plan, to show it has an adequate internal control structure in place (and is thereby in compliance with the Act).

The Public Company Accounting Oversight Board (PCAOB) was created by the U.S. Congress to oversee and administer Sarbanes-Oxley.

1. **ISO 15489-1:2001, INFORMATION AND DOCUMENTATION - RECORDS MANAGEMENT, PART 1-GENERAL and  
   ISO 15489-2:2001 INFORMATION AND DOCUMENTATION - RECORDS MANAGEMENT, PART 2-GUIDELINES**

ISO 15489 is the international standard for record management. There are two parts to the standard, ISO 15489-1:2001 and ISO/TR 15489-2:2001. Part 1 provides *guidance on managing records* of originating organizations, public or private, for internal and external clients. All the elements outlined in Part 1 are *recommended* to ensure that adequate records are created, captured, and managed.

Part 2 provides *procedures* that help ensure records are managed according to the principles and elements in Part 1.

**D. ISO 9001:2008, QUALITY MANAGEMENT SYSTEMS-REQUIREMENTS**

**Clause 4.2.4** of ISO 9001 states, in part, that “(r)ecords shall be established and maintained to provide evidence of conformity to requirements and of the effective operation of the quality management system.” It also requires that records remain legible, identifiable, and retrievable and it calls for the organization to establish a documented procedure to define record controls. This clause may, therefore, enable the organization to conform to the requirements of the Sarbanes-Oxley Act (SOX).

**E. CONTROL OBJECTIVES FOR INFORMATION AND RELATED TECHNOLOGY (CObIT)**

CObIT is a process model developed to assist enterprises with the management of information technology resources. The process model focuses on developing suitable controls for each of the Information Technology processes, raising the level of process maturity in information technology and satisfying the business expectations of Information Technology.

CObIT’s Management Guidelines component contains a framework responding to management’s need for control and measurability of Information Technology by providing tools to assess and measure the enterprise’s Information Technology capability for the CObIT Information Technology processes. The tools include:

* Performance measurement elements (outcome measures and performance drivers for all Information Technology processes);
* A list of critical success factors that provides succinct, nontechnical best practices for each Information Technology process; and
* Maturity models to assist in benchmarking and decision-making for capability improvements.

Detailed information on CObIT may be found at <http://www.isaca.org> or at <http://www.itgi.org/>.

**Revision History:**

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| **Revision** | **Date** | **Description of Changes** | **Requested By** |
| 0.0 | mm/dd/yyyy | Initial Release |  |
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| **Record**  **ITAD102-1 RECORDS CLASSIFICATION AND RETENTION GUIDE** | **File Location** | **Authority** | **Minimum Retention** | **Disposition** |
| --- | --- | --- | --- | --- |
| Management Review Minutes | President’s Office | Information Technology Managers | 3 years | Destroy |
| Training, education skills, and experience records | Personnel Files  Department Files | Human Resources  Dept. Mgrs. | Employment plus 3 years | Destroy |
| Quotation Review | Customer Service | Customer Service | 1year | Destroy |
| Sales Order Review | Customer Files | Customer Service | 3 years | Archive 7 years  Destroy |
| Design Input | Project File | Software Engineering | Life of Product | Archive 7 yrs.  Destroy |
| Design reviews | Project File | Software Engineering | Life of Product | Archive 7 yrs.  Destroy |
| Design Verification | Project File | Software Engineering | Life of Product | Archive 7 yrs.  Destroy |
| Design Validation | Project File | Software Engineering | Life of Product | Archive 7 yrs.  Destroy |
| Design Change Reviews | Project File | Software Engineering | Life of Product | Archive 7 yrs.  Destroy |
| Vendor Evaluations | Purchasing | Purchasing | 5 years | Destroy |
| Purchase Orders | Purchasing | Purchasing | 7 years | Destroy |
| Completed Work Orders | Quality Assurance | Quality Assurance | 7 years | Destroy |
| Traceability Records | Quality Assurance | Quality Assurance | 7 years | Destroy |
| Calibration Records | Quality Assurance | Quality Assurance | 7 years | Destroy |
| Internal Audit Records | Information Technology Managers | Information Technology Managers | 3 years | Destroy |
| Inspection Records | Quality Assurance | Quality Assurance | 7 years | Destroy |
| Product Release Records | Quality Assurance | Quality Assurance | 7 years | Destroy |
| Nonconformance Reports | Quality Assurance | Quality Assurance | 3 years | Destroy |
| Corrective Actions | Information Technology Managers | Information Technology Managers | 5 years | Destroy |
| Preventive Actions | Information Technology Managers | Information Technology Managers | 5 years | Destroy |
| Document Masters | Document Control | Quality Assurance | 5 years | Destroy |
| User Complaints | Quality Assurance | Quality Assurance | 3 years | Destroy |
| Design Plans | Project File | Software Engineering | Life of Product | Archive 7 yrs.  Destroy |
| Process Validation Records | Quality Assurance | Quality Assurance | Life of Process | Destroy |
| User satisfaction surveys | Information Technology Managers | Information Technology Managers | 5 years | Destroy |

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| **ITAD102-2 RECORDS MANAGEMENT DATABASE** | | | | | | | | | | | | | | | | | | | | | | |
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|  | **Date** | **Record**  **Id** | | **Description** | | **Dept Of Origination** | | **Originated By** | | **Origination Date** | | **Revision ID** | | **Revision Date** | | **Revised By** | | **Revising Dept** | |  | |  |
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|  | **Approval:** | |  | |  | |  | |  | |  | |  | |  | |  | |  | |  | |
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