

WEST LIMERICK INDEPENDENT LIVING CLG
Records Management Policy

Policy Reference	WLILP46
Category	Operational Policies — Data Protection
Version	2.0 (retention figures reconciled with WLILP7D)
Status	APPROVED — by the Board of Directors on 9 October 2026
Supersedes	WLILP46 - Records Management Policy (approved by the Manager)
Policy Owner	Board of Directors, West Limerick Independent Living CLG
Applies To	All WLIL staff and contractors involved in creating, managing, storing, or disposing of records
Related Policies	WLILP7A - Data Protection Policy; WLILP7D - Data Retention, Rectification and Erasure Policy; WLILP8 - Safeguarding Vulnerable Persons at Risk of Abuse Policy; WLILP30 - Incident Management & Reporting Policy; WLILP53 - Complaints Policy
Review Cycle	Annually, or sooner if required by legislative or operational changes

1. Purpose

To ensure that all records — whether physical or electronic — created or maintained by West Limerick Independent Living CLG ("WLIL") are accurate, secure, retrievable, and retained in compliance with HIQA standards, GDPR, and relevant legislation.

2. Scope

This policy applies to all WLIL staff and contractors involved in creating, managing, storing, or disposing of records, including but not limited to:

- Client records and care plans
- Incident and complaint records
- HR and payroll documents
- Training logs and supervision records
- Board and policy governance documentation

3. Responsibilities

- Manager — overall responsibility for policy oversight and regulatory compliance
- Service Coordinators — responsible for maintaining up-to-date client records
- HR/Administrator — maintain accurate staff files, training records, and employment documentation
- Finance Manager — maintain financial and payroll records in compliance with audit standards

4. Record Types and Retention

This policy previously maintained its own retention periods, which had drifted from WLILP7D - Data Retention, Rectification and Erasure Policy: this policy stated 8 years for client records and employment-plus-7-years for staff records, while WLILP7D states 6 years for both. To prevent the two documents disagreeing again, this policy no longer states its own retention periods. All record retention periods are set out in WLILP7D, which is the single authoritative source. The Board should note this reconciliation and confirm the 6-year figures in WLILP7D are correct.

Records covered by this policy include client care records, financial and payroll records, staff files and training records, and incident and complaint logs. Refer to WLILP7D for the specific retention period applicable to each.

5. Format and Storage

- Electronic records are maintained in secure systems such as CarePlanner, BrightPay, and Microsoft 365, with access restricted to authorised personnel
- Paper records are stored in locked cabinets in WLIL offices
- All records must be clear, accurate, and up to date

6. Access and Security

- Access to records is restricted to those with a work-related need
- Electronic systems are password-protected and encrypted, in line with WLILP29 - Information Systems and Cloud Access Control Policy
- Physical records are only accessible during business hours and are stored securely

7. Records Audit and Monitoring

- A sample of records is audited annually for accuracy and completeness
- Results are reviewed by the Quality, Health, Safety and Ethics Sub-Committee

8. Disposal of Records

- Records are disposed of in accordance with WLILP7D and GDPR, once their retention period (as set out in WLILP7D) has passed
- Electronic records are deleted securely
- Paper records are shredded via a certified service

9. Links with Other Policies

- WLILP7A - Data Protection Policy
- WLILP7D - Data Retention, Rectification and Erasure Policy
- WLILP30 - Incident Management & Reporting Policy
- WLILP53 - Complaints Policy
- WLILP8 - Safeguarding Vulnerable Persons at Risk of Abuse Policy

10. Review

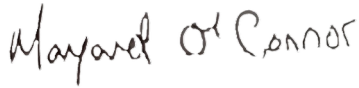
This policy will be reviewed annually, or sooner if required by legislative or operational changes.

This policy reflects GDPR and current HIQA standards, checked as accurate as of drafting. It is not a substitute for legal advice.

Approval

Approved by the Board of West Limerick Independent Living CLG on 9 October 2026.

Signed on behalf of the Board, on its instruction, by the General Manager:



Margaret O'Brien O'Connor, General Manager

Date signed: 09-10-2026