

**DOCUMENT HANDLING, DIGITISATION OF RECORDS
& RETENTION POLICY**

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**S P & D Wing
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Main Document

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References

Sl. No.	Reference	Description/ Remarks
1	<i>Section 37 of the Banking Regulation Act.1949</i>	<p><i>Section 37 of the Banking Laws (Amendment) Act 1983 has incorporated Section 45Y in the Banking Regulation Act 1983 which provides that the Central Government may after consultation with the RBI by notification in the Official Gazette, make rules specifying the period for which -</i></p> <ul style="list-style-type: none"> <i>a. A Banking company shall preserve its books, accounts and other documents, and</i> <i>b. A Banking company shall preserve and keep with itself different instruments paid by it.</i>
2	<i>Banking Companies(Period of Preservation of Record) Rules ,1985</i>	<i>The period of preservation of record has not undergone any change in the past one year. The period for preservation of different records is clearly defined in the policy.</i>
3	<i>Prevention of Money Laundering (Amendment) Act,2009</i>	<i>Clause 4 of Section 12AA -Enhanced due diligence shall be maintained for a period of 5 years in case of any dubious transaction (recent modification)</i>
4	<i>Best Practices & Guidelines for Production of Preservable e-Records by DeitY.GOI</i>	<i>No changes has been introduced.</i>
5	<i>Electronic Records Management & Archival System, Centre for Development of Advanced Computing</i>	<i>e-Record maintenance.</i>

**DOCUMENT HANDLING, DIGITISATION OF RECORDS &
RETENTION POLICY FOR THE YEAR 2022-2023
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DOCUMENT HANDLING, DIGITISATION OF RECORDS AND RETENTION POLICY - 2022-23

1. Objectives of the Policy:

A well-defined policy and establishment of a foolproof system for preservation of all records, whether current or non-current, is a prerequisite for effective functioning of an organization, like bank, that is offering variety of services to a multitude of clientele. It is essential to have a proper storage, retrieval and disposal controls of such records, including e-records, as the bank deals day in and day out with electronic data and high-risk security documents. Therefore, handling of documents/records assumes great significance.

Document management is the process of handling documents/records in such a way that documents/records can be created, shared, organized and stored efficiently and appropriately. Implementing a proper document management system is critical for banks. The focus of a document management system is on the organization and storage by which the documents are stored in an organized and secured way that still allows documents to be found easily. Hence, digitization of physical records forms an integral part of any Document Management Policy.

2. Definitions

- a. **Born-digital records** are records that have been natively created in digital format (rather than digitized from paper records). Examples of born-digital information include i.e. email, text-based documents (for example Word documents, Google documents), presentations (for example PowerPoint), spreadsheets (for example Excel), PDFs etc.
- b. **Current e-records:** The current or active e-records are those e-records, which are regularly used for the current business of the bank and continue to be maintained in their place of origin or receipt. The current e-records can be subjected to further modification and processing.
- c. **Data:** Representation of information, knowledge, facts, concepts or instructions which are being prepared or have been already prepared in a formalized manner and is being processed or has been processed in a computer system or computer network and may be in any form (including computer printouts, magnetic or optical storage media, punched cards, punched tapes) or stored internally in the memory/disk of the computer.
- d. **Digitization:** The act of scanning a physical document into digital form, as well as the series of activities that results in a digital copy being made available to end users through intranet or other means for a longer period of time.



- e. **Document:** A 'document' is a paper or any other material thing affording information, proof or evidence of anything.
- f. **Electronic Record (e-Record):** Record or data generated image or sound stored, received or sent in an electronic form or micro film or computer-generated micro fiche and shall include floppies, Digital Archive Tape (DATs), Tapes, Hard Disks, Compact Discs (CD), etc. As per the IT Act 2000 "electronic record" means data, record or data generated, image or sound stored, received or sent in an electronic form or microfilm or computer-generated micro fiche.

The electronic records or digital content are produced in the form of text, images, documents, e-files, audio, video, 3D models, web pages, maps, datasets, computer generated micro fiche and various other forms.
- g. **Electronic Records Management (ERM):** The electronic records management is the practice of maintaining the e-records of the bank from the time they are created up to their eventual disposal, which includes classifying, storing, securing, archival, preservation and destruction.
- h. **Legacy Data:** The data, which are not migrated to the new system, or the data which are purged/archived from the current database and not available for online usage.
- i. **Metadata:** Metadata is data [information] that provides information about other data. In other words, it is data that is used to describe another item's content.
- j. **Noncurrent e-records:** Noncurrent e-records are those records which are complete in all respects and which are no longer required for day-to-day conduct of an active business.
- k. **Record:** A 'record' means any document or other source of information compiled, recorded or stored in written form or on film or by electronic process or in any other manner or by any other means. In other words, records can be defined as information created, received, and maintained as evidence and information by the bank, in pursuance of legal obligations or in the transaction of business.
- l. **Unique record identifier for e- record:** A unique record identifier is a numeric or alphanumeric string that is associated with a single entity i.e. an e-record within a given system. The unique record identifier is persistently linked or associated with the e-record, which helps in its reference, location, identification, authentication, access and control. It is also used as the filename for storing the e-record.



3. ORGANISATIONAL SETUP AND ROLES & RESPONSIBILITIES:

The organizational set up for implementing 'Document handling, Digitisation of Records and Retention Policy' of the Bank and Roles & Responsibilities shall consist the following:

- 3.1. Board of Directors
 - Shall drive the effective management of Document handling, Digitisation of Records and Retention Policy.
 - Provide senior management with clear guidance and direction.
 - Review the strategies and arrangements regularly vis a vis the market changes, environmental factors, new products activities and systems and if necessary revise them in the light of the analysis.
 - Lay down appropriate approval authorities depending on risk and materiality.
- 3.2. Risk Management Committee (R M C) shall be responsible interalia for:
 - Approve the framework given in this policy to evaluate the risk and materiality of all existing and prospective arrangements.
 - Implementing Document handling, Digitisation of Records and Retention Policy management issues delegated to it by the Board.
 - Undertaking regular review of strategies and arrangements for their continued relevance, and safety and soundness and making appropriate recommendations to the Board.
- 3.3. Operational Risk Management Committee (ORMC) shall be responsible interalia for:
 - Permitting the Policy and recommending the same to the Board of Directors for adoption.
 - Acting as a technical Committee to the Board of Directors.
 - Reviewing the strategies & arrangements for their relevance and safety & soundness and making appropriate recommendations to RMCB/Board.
- 3.4. Chief General Managers/General Managers of various Wings shall be responsible for:
 - Evaluating the risks and materiality of all existing and prospective arrangements pertaining to their Wing.
 - Preparing list of activities pertaining to their wing and formulation of the procedures to be adopted by circles & branches and offices based on the materiality of the activity and policy framework.
 - Reviewing periodically the effectiveness of strategies and arrangements.



- 3.5. **Inspection Wing / Compliance / Risk Management:**
Inspection Wing during RBIA shall conduct audits independently for the compliance of the policy.
- 3.6. **Circle Office / Regional Office / Branches-**
- Implementation of the policy of the bank.
 - Reviewing periodically the effectiveness of policies and procedures communicated by the Wing.

Further General Administration Wing has provided the operational guideline for centralized storage of old records in Digital Form as per Appendix 12. The legacy in terms of digitization of old records will be taken care by the Wing.

The rapid digitalization has led to an exponential growth in business data and content. Every day is creating and managing massive amount of business documents, contracts, loan proposals, marketing material, HR guidelines etc. These documents are often scattered all over the place. Organisation and storage of files has always been an often overlooked aspect. In this regard, our Bank has rolled out DMS project in the month of April, 2020 which allows the creation, storage, managing, indexing, protection, and retrieval of digital documents. It facilitates the easy flow of critical information across the organisation.

It aims to digitally organize all files and documents within an organization in a secured manner which will be easily accessible to all the users.

The purpose of this policy is to evolve a well-defined systems and procedures relating to management of all types records/documents including those for electronic records management. To ensure uniformity in approach towards achieving the objectives of the policy, appropriate guidelines are drawn on proper storage of old records, its retrieval and withdrawal for reference, redeposit on a day to day basis and ultimately its disposal, etc.

4. Risk assessment and mitigation:

Law does not afford any protection in respect of any negligence in the matter of preservation. The only protection available is in case of records destroyed by fire, inundation, flood, earthquake or any other Act of God. Where such a circumstance comes about, a list has to be made in respect of the items that are missing and an endorsement has to be made on the register stating that the record item numbers are destroyed by fire, inundation, earthquake, etc. For this purpose, the policy of the bank on security arrangement to be followed to avoid any incidence of fire.



- Further it has to be ensured that digital images are managed according to the Organization’s records management program and the digital images captured into a recordkeeping system where they can be accessed only by authorised users, secure from alteration or deletion, in context with related records, protected from disaster and kept for their required retention periods. It has to be ensured that all the master images are not stored on removable media where they can be at risk and their duplicates are managed as per the record management programme.

5. Scope:

The scope of this policy is to define standard procedures for document storage, retrieval and disposal of all-important documents including those in electronic/scanned form, to be preserved as per statutory/regulatory requirements by various functionaries of the Bank. The objectives of the Document/Record Management include-

- i. Preservation of records in physical or digitized mode.
- ii. Retrieval of documents when required for future reference.
- iii. Disposal of records.

6. Guidelines on e-Record maintenance

Consequent to enactment of Information and Technology Act, 2000 and amendments to Bankers’ Book of Evidence Act, 1891, records maintained in electronic form and transactions undertaken electronically are now recognized by the law. To ensure compliance of various statutory provisions in connection with preservation, retrieval and destruction of e-Records, Bank has evolved **Information Security Guidelines** wherein the policy guidelines on “e-records maintenance” are dealt with in detail. Branches/Offices shall be guided by the same.

7. Preservation of physical records:

7.1. Statutory requirement:

Preservation of records by banks for a prescribed period is a statutory requirement also.

Section 37 of the Banking Laws (Amendment) Act 1983 has incorporated a Section 45Y in the Banking Regulation Act, 1949 which provides that the Central Government may after consultation with the RBI by notification in the Official Gazette, make rules specifying the period for which -

- a. A banking company shall preserve its books, accounts and other documents, and
- b. A banking company shall preserve and keep with itself different instruments paid by it.



Accordingly, in exercise of the powers conferred as above, the Central Government has formulated rules prescribing minimum period of preservation for certain records.

Keeping in view the statutory requirement under the Banking Companies' (Period of Preservation of Record) Rules, 1985, the Prevention of Money Laundering (Amendment) Act, 2009, etc., period of preservation is prescribed by the Bank for various records/files including slips, clearing schedules, etc., as follows:

Sl. No.	Records/files	Period of Preservation
1	Branch License / Branch shifting	To be maintained permanently.
2	Policy Matters	
3	Records relating to owned premises	
4	Inventory Register	
5	Investigation Reports	
6	Files relating to Staff lapses where disciplinary action is recommended	
7	Register of Mortgages & Charges	
8	Claim applications on account of deceased account holders	To be preserved permanently.
9	Records which relate to disputes or litigations in the Court of Law	Records to be preserved for 20 years after the disputes are over.
10	Records set out under Prevention of Money Laundering (Amendment) Act, 2009 Records set out under Prevention of Money Laundering (Maintenance of Records) Rules, 2005	Records to be preserved for at least 5 years from the date of transaction between the bank and the client. Records should be maintained for at least 5 years from the date of cessation of transactions between the bank and the client. Please refer Appendix-9
11	Unclaimed deposit	To be maintained till the claim is lodged and 20 years after it is settled.

Sl. No.	Records/files	Period of Preservation
12	Specified records and registers where customers/third parties' transactions are recorded	10 years from the date of transaction between the Bank and the client.
13	Specified records and registers where the transactions are internal in nature	5 years immediately preceding the current calendar year.
14	Records and registers for which preservation period is not prescribed by statute and the transactions can be tracked with the help of details available in other records having longer period of preservation	A period ranging up to 5/3/2/1 years immediately preceding the current calendar year.
15	Any written off loan account in which, fraud has been detected, or investigation is in progress and staff accountability is ascribed.	In such cases, prior permission be obtained from the competent authority for elimination of records irrespective of the period since they are maintained.
16	In respect of Written off loan accounts, preservation of the loan papers, files, registers etc.	Preserved for a period of 10 years from the date of closure of loan a/c or settlement of DICGC/ other claim, if any, whichever is later.
17	Preservation of physical cheques as required under CTS	The presenting branches should preserve the physical cheques in their custody securely for a period of 10 years. The images of all the government cheques paid should be preserved by the drawee banks likewise for a period of 10 years.
18	Preservation of physical cheques/images of Government Cheques paid by drawee branches	10 years.
19	Records of Transactions pertaining to Money Changing Activities	5 years.
20	Period of maintenance and preservation of records in respect of Depository Services	AS PER APPENDIX 10

Sl. No.	Records/files	Period of Preservation
21	Preservation of Counterfeit Notes received from Police Authorities/Courts	The branches should preserve the Counterfeit Notes for a period of three years from the date of receipt from the Police Authorities/Courts. Counterfeit notes, which are subject matter of litigation in the court of law should be preserved with the branch concerned for three years after conclusion of the court case.

Period of preservation for various records, documents, registers, files, reports, closed loan papers including records/files pertaining to written off accounts, etc., at Branches, Circle Offices, Zonal Inspectorates, HO and other offices are prescribed basing on the requirements are furnished in **Appendix -1 to 10**.

7.2. Preservation of Security Items:

Utmost importance has to be attached for safekeeping of security items as branches carryout a large number of financial transactions of huge value every day. It has to be ensured always that security items through which financial transactions are carried out are not put into the hands of fraudulent elements to avoid any financial loss either to Bank or to customers, putting into stake bank's reputation.

The detailed procedures for handling of various security items have been laid down in respective Manuals of Instructions.

For the sake of convenience and also the risk attached to each item, the security items with reference to their place of storage are grouped as under:

- Group A : Items to be necessarily held in FBR Strong Room/FBR Safe.**
- Group B : Items to be held preferably either in FBR/Strong Room/FBR Safe or in Fire Resistant Record Cabinet (which basically has a dual locking Arrangement).**
- Group C : Items to be hold (either preferably in FBR Strong Room/FBR Safe/Fire Resistant Record Cabinet or in cupboard with dual locking arrangement).**

The illustrative list of security items with reference to their place of storage as per the above grouping is furnished as **Appendix-8**.



8. Provisions for exception/ ratification procedure and its delegation

Documents/records for which no specific retention period is prescribed have to be preserved taking into account the risk factors attached to each item or the probability of requirement of such records at a future date. Branches/offices to take up specific issues with concerned Circle Office for guidance.

9. Preservation of old records

9.1. Place of Storage:

There has to be a properly identified and approved place of storage to keep all old records of the branch safely. Wherever centralized storage arrangement can be made, such place should be convenient and easily accessible to all the branches/offices in that particular place. Care should be taken that selected place is a well secured, top grade constructed, with adequate safeguards against fire, termites, white ants, seepage, etc.

However, all security documents requiring dual control are to be kept with the branch/office for future reference with proper indexing for identification.

As storing of data in electronic form is gaining momentum for the numerous advantages it has, the Bank has included a workflow for scanning and storing of documents in electronic under 'Document Management System' which is already implemented. Further, for converting the existing documents in physical form into electronic form, GA Wing has shared a SOP which is furnished as Appendix 12.

9.2. Procedure to be followed for storage / retrieval of old records:

9.2.1. Storage:

All the records kept under preservation at Double Lock, Record Room or within the branch/office premises, should be given serial references/index number based on number of years of storage is required, duly authenticated by the authorized official nominated for the purpose.

While segregating the old records, proper care has to be taken that current records placed in the branch/office are also well secured.

Proper records have to be maintained for recording the items that are kept in the records room (Records Inward & Destroyed Register).

All records older than 3 years that are not required for frequent reference may be transferred to the old records under authentication of an Officer/Manager.



9.2.2. Retrieval of Old Records:

A register (Records Outward Register) has to be maintained to keep track of records that are taken out from the record room for reference purpose and kept back. No document/record shall be taken out of the records room without production of a requisition slip duly authenticated by the authorized official. It is to be ensured that the item taken out is placed back in the records room without any delay, with necessary authentications.

In all cases, where records are to be taken possession by the Police/ Governmental authorities, a written requisition has to be taken and an acknowledgement obtained from the recipient in respect of particular record to be taken possession of or delivered to, retaining copies of the records delivered.

10. Compliance/ monitoring of implementation of the policies/ destruction of old records and Safety & Security of Records:

10.1. Procedure for destruction of old records by Branches/Offices:

Every year during November, a list of old records to be destroyed is prepared duly taking into consideration the 'retention period' for each record and submitted to Premises & Estate Section of concerned Circle/ Premises Policy & Admn. Section, GA Wing, HO as the case may be, on or before 7th of December every year and obtain permission for destruction. The entire process should be completed before the end of April.

While submitting the list of old records due for destruction to General Administration Section, branches have to necessarily submit a certificate as under:

CERTIFICATE

“We have carefully scrutinized the old records of our branch/office and those which have completed the prescribed retention period as per Manual/Circulars have been segregated for destruction. The list of such records is enclosed.

Further, we have ensured that all the records which have not completed the prescribed retention period and also records relating to litigation/dispute are retained and kept safely as per guidelines.”

Signature of the Branch-in-Charge

Upon obtaining permission, the work of disposal of old records can be entrusted to local waste paper merchant or agency duly fixing reasonable consideration depending upon the



rate prevailing in the market. If no purchaser is available locally, the records may be destroyed by burning them. In such cases, care should be taken to see that records are fully burnt. No record should be allowed to be taken outside the premises without being torn into small shreds.

The Records Inward & Destroyed Register should be preserved permanently.

During RBIA, the Inspecting Officers are required to record their observations in their reports regarding preservation and destruction of records. Irregularities noticed, if any, are to be followed up with the concerned by the controlling authority for rectification.

On yearly basis, as at the end July, Circle Offices shall furnish the information in a structured format regarding grant of permission for disposal of old records to Premises Policy & Administration Section of G A Wing.

No record or document shall be disposed notwithstanding the fact that the periodicity for which it is to be preserved has lapsed, if any enquiry, claim or litigation is pending in respect of any information contained in such document or record.

10.2. Destruction of Unused/Cancelled Security Items:

For destruction of unused security items, specific guidelines issued by concerned Wings are to be adhered to. Cancelled security items are to be properly preserved and effectively destroyed during the course of RBIA in the presence of the Inspecting Officer and Double Lock/Strong Room key holders.

The persons entrusted with the responsibility of safe keeping of security items or preservation of records, documents, etc., will be made accountable for missing/ lost items from their custody.

Branches/offices shall strictly adhere to the operative guidelines elaborated in the BPC -Manual of Instructions on “Correspondence, Filing, Preservation, Destruction of Old Records, E-records Maintenance and Reconstruction of Accounts” and Circulars/Communications issued from time to time on the subject.

10.3. Safety & Security of Records:

- i. Records/ Documents shall be maintained in such a manner that they are available as & when needed and shall be preserved in such a way that they are accessible only to the authorized officials of the bank.
- ii. The documents shall be segregated into “Current & Old” and the Old records shall be periodically rearranged in order to accommodate additional/ new records.



- iii. Periodical pest control shall be carried out to protect documents from the attack of rodents (rats, cockroaches, termites etc.,). Branch officials shall inspect the storage of documents at frequent interval and take appropriate action to preserve the old records wherever necessary.

11. Digitization of physical records/documents:

11.1. Present Status:

Presently records other than „born digital' records are preserved in physical form in the respective branches/offices itself. On expiry of the specific period of preservation stipulated for each record, they are being destroyed as per guidelines.

11.2. Need for Digital preservation:

There are compelling reasons and expected benefits which necessitate digitizing and subsequent treatment/preservation of physical records. Some of the common objectives for digital preservation are:

- i) Saving space
- ii) Integrating with business information systems
- iii) Providing better access
- iv) Protecting the records.

Of the above objectives, the immediate and compelling ones for digitization of records arise from the last two objectives, ie. providing better access to old records through a quick retrieval mechanism and also protecting the records from deterioration in quality due to frequent handling of such records. Digitization can be a way of protecting them by reducing ongoing handling.

The objective of saving space can be achieved only when the digitized physical records are destroyed subsequent to digitization or when the source physical records are transferred to centralised storage facilities. The physical records, in spite of being preserved in the digitized form, need to be preserved as per the statutory and administrative requirements of the bank detailed elsewhere in this policy document. Such records can be destroyed only after duly complying with the guidelines/procedure for destruction of old records as detailed in Para No. 10 above. **The policy/operational guidelines for centralised storage and retrieval of old records issued by the General Administration Wing of the Bank is enclosed as Appendix 12.**

11.3. Activities to be undertaken for digitization

As digitization provides a means for preserving physical documents as well as providing greater accessibility and security for those documents, the process includes the following activities:

Classification: Internal



- i) Identifying, selecting, and documenting physical documents for digitization;
- ii) Preparing physical documents for scanning (including locating, preserving, gathering, reviewing for access, and screening for suitability to be digitized);
- iii) Collecting basic descriptive and technical metadata sufficient to allow retrieval and management of the digital copies and to provide basic contextual information for the user;
- iv) Scanning the physical documents (also referred to as digital conversion), re-filing, or disposing;
- v) Quality control (validation) of digital copies and metadata;
- vi) Providing access to reliable and authentic copies for legitimate business purposes to multiple users;
- vii) Maintaining digital copies and metadata

11.4. Applicability

11.4.1. The policy guidelines detailed herein are intended to provide guidance and requirements for digitizing physical documents.

11.4.2. This policy applies to all physical documents being considered for digitization. Such documents fall into two categories:

- i) Inactive records that have not met their retention schedule (especially documents that are voluminous or have a long retention schedule) and are not regularly accessed. These may be considered for digitization due to constraints of physical storage space at branches/offices or costs of maintaining the documents; and
- ii) Active records that are initially produced in paper or similar physical media as part of the business processes, and are regularly accessed for a continuing business purpose. Digitization may provide for access among multiple users across multiple locations.

11.4.3. Consequent to digitization as above, the Bank may move the physical documents to centralised storing place for which separate policy/guidelines is framed by the General Administration (GA) Wing of the Bank. The possibilities for including digitization as a pre requisite to the movement of records to centralised offsite storage facility may also be explored by the GA Wing while formulating the above policy/guidelines.

11.5. Identification of Documents for digitization

11.5.1. Physical documents may be digitized to protect them from the risk of damage or destruction, which may result in the loss of the record. Further, digitization may be an effective way to maintain and manage physical documents.



11.5.2. Before undertaking digitization of documents, the Bank shall consider the following:

- i) Volume of the documents
- ii) Cost to digitize;
- iii) Need for availability (sharing) of the documents;
- iv) Quality of the originals (including handwritten notes, degradation of original document, etc.); and
- v) Need to preserve the originals after digitization for historical or other purposes.

11.6. Digitization plan

The Bank shall develop a digitization plan detailing the following requirements:

11.6.1. Authorization: Some digitized documents may be maintained as the only copy of a physical document if such digitized documents are viewed as being functionally equivalent to the original physical version and if the intent to preserve the document only in digital form is documented and authorized by the Bank. This authorization and business process documentation must be included in the digitization plan.

11.6.2. Preparation of Document for Digitization: This shall include a review of the documents to be digitized to ensure that digitization will not compromise the readability of the content. This is particularly important for documents that include “marginalia” (handwritten notes or additions to the content of the document). Moreover, an inventory of the documents must be prepared, especially in instances where the actual digitization is performed by outsourced agencies. Further, in some instances, a clean copy may be necessary if the original document has been degraded to the point that, in its original form, a valid digital copy would not be possible.

11.6.3. Digitization: The bank may specify the types of documents (current/ non-current records) to be scanned and also the periodicity of the scanning/digitization process. Certain documents like specimen signature cards/e-KYC/KYC/ etc., are now being scanned on a regular basis for which guidelines have been separately issued by the bank. The bank may also specify the scanned image type for digitization. Consideration must be given to the ability of a particular scanned image type to be searched. “Scanned image” types include: png (portable network graphics); jpeg (joint photographic experts group); or searchable PDF for Archival (PDF/A) format. Scanningshall include indexing/meta data generation / storing and uploading to the software. Bank may also specify whether the scanning process will be done in- house or will be outsourced.



At least two copies of the e-records should be retained at different locations. Encrypt the private or confidential records which can be decrypted only by the authorized personnel.

For the records that are having evidentiary value, corresponding digital records should be hashed and the list of such hash values are to be maintained separately.

- 11.6.4. Mode of Scanning of Records:** The documents identified for scanning may be old, delicate, fragile and brittle. Hence, sophisticated handling techniques may be required and hence high-quality fast scanners may be deployed. Scanning shall be done on-site in the respective branch/offices. The data scanned shall be stored in the Bank server/other locations and could be shared/retrieved at any time as decided by the bank.
- 11.6.5. Validation:** Throughout the digitization process, the scanned images must be validated to ensure that a clean, readable image has been produced and that the metadata attached is accurate. The Bank may choose to do digitization of an initial series of documents from the list of documents to be preserved as a test case. In such a case, sample documents shall be so chosen so as to cover the range of quality and other attributes of the originals, e.g., differing font sizes or layouts. It is desirable that every scanned image be validated. However, if the original documents are of highly consistent quality, format, and content, sampling validation may be appropriate.
- 11.6.6. Disposition of Originals:** Once the documents have been digitized and validated, the original physical documents may be destroyed as long as the destruction is documented as part of the digitization plan and is in due compliance of the policy guidelines as per Para no.10 of this policy guidelines. Further, special consideration must be given to physical records with historical value content.
- 11.6.7. Digital Storage:** The Bank has formulated Information Security Policy and Information Security Guidelines covering e-Record Maintenance, Preservation/Storage. The digitization plan shall adhere to the guidelines detailed therein. The Bank may also formulate an Electronic Information System (EIS) for maintenance and management of the digital documents duly meeting the integrity, security, and availability requirements of the documents duly complying with the regulatory requirements in this regard. Further, an Electronic Record Keeping System (ERKS) may also be formulated for digital documents duly containing guidelines to prevent manipulation and unauthorized deletion of the scanned images. In addition, ERKS may also contain provisions for enhanced security and permission restrictions to aid management of the digital documents.



If an ERKS is not formulated / implemented for digital documents, accessibility to such documents must be restricted to ensure that the integrity and security are not compromised.

11.6.8. Unique record identifiers: The Bank shall define a set of rules or conventions for generating the unique record identifiers as per the guidelines given below -

- i) Select at least 3 to 4 relevant elements as per the examples given in the Appendix 11 for defining the rules or conventions for generating the unique record identifiers.
- ii) Standardize the abbreviations or short forms to be used for referring the classification of e-record.
- iii) Standardize the separators between the filename elements and numbering.
- iv) Avoid the use of controlled characters and empty spaces.
- v) The length/character sets of the unique identifier should be compatible across operating systems/file systems as it has to be used as filename of the e- records.

Further details regarding unique record identifiers along with examples of common elements in the unique record identifier and the benefits of assigning unique record identifiers to e-records are provided in Appendix 11.

11.7. Retrieval of records: Branch/ offices, requiring e- records for perusal, have to quote the unique record identifiers for retrieval of records. Only authorised Officers shall be able/shall have access to retrieve the old records.

11.8. Destruction of Digital records: The Bank must retain, dispose e-records duly complying with the retention period stipulation for each underlying physical record and must apply additional considerations to ensure compliance to legal / regulatory guidelines in this regard specifically applicable for e-records / digitized records. Those policy guidelines for destruction of physical records as detailed in Para No. 10 of this policy shall be taken into account as applicable while destroying the corresponding digital records as well.

12. Regulatory prescription:

The Policy will be reviewed annually in tune with the regulatory guidelines/internal requirements or as and when considered necessary.



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APPENDIX-1

ILLUSTRATIVE LIST OF DOCUMENTS/RECORDS TO BE PRESERVED PERMANENTLY (H.O., C.O., RO., Branch and all other Offices, as the case may be)

- 1) Register of Shareholders (maintained electronically).
- 2) Register of Directors / Attendance.
- 3) Minutes Book - Board of Directors / Committees.
- 4) Book of Minutes on meetings of Shareholders. (Annual General Meetings/Extraordinary General Meetings).
- 5) Return of Annual list of Members and summary of capital (maintained electronically).
- 6) Dividend Warrants Register (maintained electronically).
- 7) Transfer Deed Files.
- 8) Share Certificates - Sub division, Duplicates - Documents.
- 9) Share application forms.
- 10) Register of Mortgages and Charges.
- 11) Provident Fund Registers.
- 12) Provident Fund Loan Ledgers.
- 13) Provident Fund General Ledgers.
- 14) Provident Fund Day Book.
- 15) Provident Fund Investment Register.
- 16) Trustees" Minutes Books.
- 17) Investment Registers.
- 18) Security Register.
- 19) Staff Service Records.
- 20) Salary Summary.
- 21) Staff File Index book (Permanent but with the department until new one is prepared).
- 22) Register for Power of Attorney, Succession Certificates, Death Certificates etc.
- 23) Records relating to transactions which are in dispute.
- 24) Premises and properties files and records.
- 25) Loans, Cash Credits Overdraft Registers which contain particulars of title Deeds relating to accounts which are in force.
- 26) Powers of attorney (Current and Savings Bank).
- 27) Account opening forms of Current and savings Bank and other accounts with copy of proof of identity and address and other documents including nomination forms.
- 28) Leave Record Register.
- 29) Memorandum of Letters of Lockers and Specimen Signature cards.
- 30) Safe Deposit Locker Agreements.
- 31) Key Register for loan papers, mortgage papers, etc.
- 32) General Ledger
- 33) Specimen Signature file or books.
- 34) Confidential Files and files relating to Industrial Disputes and Writ Petitions.
- 35) HO Circulars.
- 36) Claims Files / Death Claims Register / Nomination Register.



- 37) Head Office Correspondence.
- 38) Furniture files.
- 39) Indemnity Bonds.
- 40) ATM/Debit Card issue - Registers/Applications.
- 41) Default Account intimation for funds transfer, utility payment in respect of Tele Internet banking Registers/Applications.
- 42) Acknowledgement for receipt of PIN/ Password/User ID.
- 43) Vendor Agreements/Third party Agreements.
- 44) Pre- migration Data Backup (Physical).
- 45) User Identification Register.
- 46) Registers indicating Records held in Electronic Form.
- 47) Disputed Transaction Records.
- 48) FEDAI Circulars.
- 49) International Division Circulars
- 50) Specimen Signatures of Foreign Bank Officials (to be destroyed within 6 months after new book is received).
- 51) Booklet supplied by RBI to identify the names of the parties black listed and necessary amendments
- 52) Claim application on account of deceased Non-Resident (Ordinary)/ Non-Resident (External)/ FCNR (B) account holders.
- 53) Records pertaining to unpaid Export Bills along with correspondence and GR Form.
- 54) REPO Register.
- 55) Register for recording Deposit of Title Deeds
- 56) Jewel Appraiser's File.
- 57) Data processing Policy along with account related records pertaining to purchases/orders.
- 58) Hardware/Software Register.
- 59) RBI Inspection Reports/Notes.
- 60) Bonus Paid Register /File.
- 61) Complaint Register / File.
- 62) Records Inward & Destroyed Register (NB.29)
- 63) Matters relating to Branch License, Branch shifting/timings, policy matters advised to Branches
- 64) Govt./Regulatory correspondence
- 65) Caution Advices / Willful defaulters' details
- 66) Parliamentary Star Questions / replies.
- 67) Records of Household Survey under PMJDY conducted in Rural SSAs and Urban Wards.
- 68) Records/documents containing details of all accounts and transactions, including deposit accounts in respect of which amounts are required to be credited to the Depositor Education & Awareness Fund.
- 69) Register of Members
- 70) Counterfoils of Share Certificate
- 71) Sundry Assets Files
- 72) Credit Information Book
- 73) Office Order Book

APPENDIX-2

ILLUSTRATIVE LIST OF RECORDS TO BE PRESERVED FOR 10 YEARS IMMEDIATELY PRECEDING THE CALANDER YEAR AT BRANCHES

No	DEPOSITS	ADVANCES	MISCELLANEOUS SERVICES	OTHERS/ RETURNS
1	Cheque Book Issued Register	Customers' files (to be preserved for 10 years from the date of closure of relative account	ISC Parcel Register	Shroff Cash Book, Shroff cash payments, Cash Register.
2	Requisition slips in respect of cheque books kept along with Cash paid instruments.	Guarantee Issued cum Liability Register	Counterfoils of Safe Custody Receipts and receipts issued for locker rents paid	Delivery Book
3	Pass Books which have been taken back from parties at the time of closure of their account	Supply Bills, BE, LBD, BR, CDB, SDB, FDB, FBE, LHV, DPG and PL Register	Non-payment advice cards received from Bankers and more branches in respect of OBC, OSC, etc. and realization advices from Banks.	Letters Received Book
4	Any Funds Register	ML Register (to be preserved for a period of 10 years from the date of closure of the last outstanding loan)	Fate cards received in connection with ISCs received and realized.	Cash Suspense Book
5	Cheques Refused Register	Register for Delivery Orders & Godown Keys.	Register of ATM withdrawal discrepancies.	Tappal Book (inward and outward)
6	Daybook	Key Registers	ATM Cash Balancing Worksheet Register	Cash Abstract
7	Token Register	Matured fire policies and relative insurance cove notes.	ATM Card Application Inward Register at Branch	Acquittance Register
8		Credit Limit Books	ATM Log book for recording entry and exit at ATM	Attendance Register

No	DEPOSITS	ADVANCES	MISCELLANEOUS SERVICES	OTHERS/ RETURNS
9		Fire Insurance Policy Register	Register for noting ATM cards hot listed	Casual Leave Register
10		Discretionary Power Register	Register for noting retained ATM cards and disposed thereof.	Double Lock Register
11		Sundry Registers	Cash Requisition Slips copies	Work Assessment Register
12		Drawing Limit Book	Records of Sale and Purchase Contract.	Medical Bill paid Register
13		Godown Books	Parameter/Master Modification Register.	Particulars of salary
14		LC Register	Remittance register.	Locks Register
15		CIBIL/ CIRs data		Postal receipt acknowledgements
16		Copies of forwarding letters in respect of CDB, SDB, BE, etc., and copies of intimations	Inventories prepared in respect of articles in Safe Custody and Safe Deposit Lockers.	Log Book Vehicle Maintenance
17		Non-payment advice cards received from Bankers and our branches in respect of CDB, SDB, BE etc. and realization advices from Banks.	Cash Receipt Waste, Transfer Waste.	Returns - Refer below : Note 5
18		Closed loan papers/documents both fund based and non-fund based (10 years from the date of closure) Cir.218/93	SDL cum hirer attendance register	Files relating to Govt. accounts.

No	DEPOSITS	ADVANCES	MISCELLANEOUS SERVICES	OTHERS/ RETURNS
19		In respect of Written off loan a/cs , the loan papers, files, registers etc., be maintained for a period of 10 years from the date of closure of loan a/c or settlement of DICGC/other claim, if any, whichever is later.	Safe Custody register & Ledger	Files containing copies of HO daily statements
20		Trust Receipt certificates	Travellers' Cheque Register	Closed Records Outward Register.
21		Register showing collection of Dividends and interest on securities on behalf of constituents		Inter branch correspondence files.
22		Register of shares received		All slips and vouchers including paid cheques and PayOrders. (Slip Bundle and Cash Paid instruments/JPT)
23		Advices of Letters of Credit and Inland Bank Guarantees		Bankers' Files (permanent till arrangement is in force)
24		Risk profile records		Follow-up Register/ Overtime Register
25		Register showing collection of Dividends and interest on securities on behalf of constituents		Customers' files

NOTE:

1. All the registers in the case of advances should be preserved for 10 years from the date of closure of last outstanding account and in the case of deposits, from the date of last operation in the last outstanding account.
2. Closed ledger sheets/transactions details in respect of Live Accounts - both deposits and advances accounts other than term loans and Term Deposits are to be preserved for a period of 10 years from the date of last transaction. In case of Term Deposits and Term Loans, the ledger sheets/transactions details shall be preserved for a period of 10 years from the date of payment / closure of the account respectively.

(However, at the time of destruction of ledger sheet/records it is to be ensured that the entries therein are not subject matter of any dispute, suit filed account, court attachment, garnishee/attachment order etc. and in such cases the records shall continue to be held).

3. The Sundry Assets, Sundry Liabilities, Branch Adjustment Account Registers, etc. should be preserved for 10 years from the date of tallying of the last outstanding entry.

4. Records of Govt. transactions:

Scrolls relating to Government transactions should be preserved for a period not less than 10 years immediately preceding current calendar year and consolidation sheets be preserved for a period not less than 3 years preceding the current calendar year, provided, in the meantime audit of the relative records have been done. In case audit is not over, records should not be destroyed unless otherwise advised by the appropriate authorities or until audit is completed and related objections, if any, are settled finally.

5. Preservation of returns:

- a) To external agencies - for 10 years.
 - b) Internal Returns
 - i) Originals (at HO) - 5 years (for Statistical purposes, consolidated Return or Computer printout)
 - ii) Copies (at branches) - Control Returns and Statistical Returns for 5 years.
6. The records involved in any investigation/fraud cases should not be destroyed without permission from the competent authority.



APPENDIX - 3
PRESERVATION OF FILES MAINTAINED BY BRANCHES:

Sl. No.	File No.	Contents	Preservation period
1	HO	Standing Instructions	10 years
2	HO	Sectional Circulars/ECGC Circulars	10 years
3	HO	Confidential Circulars	The title has to be reviewed. Permanent instructions should be Segregated. Circular regarding missing security items etc., to be destroyed after five years
4	HO	Inspection/ Audit Reports and replies including Statutory Report (Chartered Accountant) LFAR Review Report	5 years from the date of each Report/reply. (retain 3 preceding reports/replies)
5	HO	Periodical Returns except Balance Sheet of the Branch	Refer Note in Appendix-2
6	HO	Establishment - for leave, transfer, salary, TA	5 years (does not include personal files with CO, Staff Sections, HO etc.)
7	HO	Rate of discount, interest	10 years
8	HO	Confidential letters from and to HO and RO/CO letters	Preserved permanently
9	HO	Annual, Half yearly and Quarterly Balance Sheets along with the copies of relative returns	10 years
10	HO	Stationery & Printing	10 years
11	HO	Inter Branch Communications	10 years

GL Files

Sl. No.	File No.	Contents	Preservation period
1	GL	Term Deposit Applications	Preserved permanently
2	GL	CA applications	Preserved permanently
3	GL	SB a/c applications	Preserved permanently
4	GL	Records pertaining to the identification of customer and his address obtained while opening the accounts.	Preserved permanently along with applications.
5	GL	Delivery orders under Produce Loans	10 years
6	GL	Mandate of individuals, companies etc., with indices	10 years from closure of each account
7	GL	Safe Custody	10 years from closure of each account
8	GL	OPL letters received and extra copies of OPL sent.	10 years (from the closure of account in respect of borrowable a/c"s)
9	GL	Correspondence relating to rent, electrical charges, telephone charges, receipts relating to premises, equipments where we have own buildings, copies of lease and correspondence relating thereto	10 years (covered in Appendix-2)
10	GL	Bank Account Statements (Bankers statement secured in lieu of pass book) and reconciliation statement	10 years
11	GL	Letter of Credit received or procured from other banks and other branches	10 years
12	GL	IT deduction certificates and Bank Income Tax	10 years

Sl. No.	File No.	Contents	Preservation period
13	GL	Balance Sheets of other Banks and Joint Stock Companies	10 years
14	GL	General charges (triplicate / Duplicate) slips with vouchers to be kept in the custody of Managers	10 years
15	GL	Fire Insurance Policies	10 years
16	GL	Application forms relating to Debit Cards / Credit Cards	Preserved permanently
17	PR		10 years
18	BK		10 years
19	CR Files	i) MSCR	10 years
		ii) CR individual	10 years from the closure of the account
20	CR	Rejected loan proposals	5 years

APPENDIX - 4

**PRESERVATION OF RECORDS/FILES AT CIRCLE OFFICE / REGIONAL OFFICES-
 DEVELOPMENT FILES, FILES RELATING TO RETURNS, PREMISES FILES AND CREDIT
 REPORT FILES AND PERSONAL MATTERS.**

Nature of Files	Preservation period at Circles
<p>1. Staff Files (Correspondence)</p> <p>a) Files relating to staff at CO/RO (similar to files maintained at branches)</p> <p>b) Files relating to staff matters of other branches (containing copies of Transfer Orders/Sanction of casual leave to Manager /Senior Manager of the branches coming under CO /RO / deputation arrangements / Conveyance charges matters</p> <p>c) Leave record of ex-employees</p>	<p>5 years</p> <p>5 years</p> <p>5 years</p>
<p>2. Development Files</p> <p>a) Files relating to target fixed for braches / BPC / appreciation letters / cash regulation matters / Development Circulars / letters</p> <p>b) Performance Budgeting</p> <p>c) Matter relating to Branch License, Branch shifting /timings, policy matters advised to Branches</p>	<p>5 years</p> <p>5 years</p> <p>To be preserved permanently.</p>
<p>3. Files relating to Returns/Follow-up of Returns:</p> <p>a) Copies of Returns prepared and submitted by RO/CO:</p> <p>i) Statements / Returns including RBI / Flash etc. ii) Copies of Returns submitted to HO (either pertaining to their own office or Consolidated and submitted)</p> <p>b) Returns received by ROs/ COs from branches for review etc.,</p> <p>i) Statistical Returns ii) Control and other returns</p>	<p>To be preserved for 5 years.</p> <p>5 years</p> <p>5 years 5 years.</p>

<p>4. Premises Files:</p> <p>a) Matters relating to owned premises/quarters</p> <p>b) Matters relating to leased premises/quarters:</p> <p> i) Where there is no dispute</p> <p> ii) Where the matter is subject to any dispute or litigation</p> <p>c) Vehicle maintenance:</p> <p> i) Files relating to vehicles of ROs/COs ii) Files relating to vehicles of branches</p> <p>NOTE:- Individual files should be opened and maintained till the disposal, as amount spent is to be known.</p>	<p>To be preserved permanently</p> <p>To be preserved for 5 years from the date of vacating the premises /quarters to the Landlord by the Bank</p> <p>To be preserved for a period of 20 years from the date of final disposal of the dispute or litigation or 20 years after vacating the premises /quarters to the Landlord by the Bank whichever is later.</p> <p>2 years after the disposal of the vehicles</p>
<p>5. CR Files:</p> <p>a) Credit files of the existing Accounts</p> <p> i) Where there is no litigation</p> <p> ii) Where the matter is a subject of any dispute or litigation</p> <p>(b) MSCR files (Miscellaneous)</p> <p>(c) BSCR - Branch sanctions and relative correspondence</p>	<p>All the files of running account are to be preserved. However, in the case of closure of an account, the files are to be preserved for 10 years from the date of closure of the account.</p> <p>To be preserved for 10 years from the date of closure of the account.</p> <p>To be preserved for 20 years from the date of final disposal of the dispute or litigation.</p> <p>10 years</p> <p>5 years</p>

Note : Also refer Appendix -5.

APPENDIX - 5

RECORDS TO BE MAINTAINED AT HEAD OFFICE AND ADMINISTRATIVE UNITS

RECORDS TO BE PRESERVED PERMANENTLY	RECORDS TO BE PRESERVED FOR 10 YEARS	RECORDS TO BE PRESERVED FOR 20 YEARS FROM THE DATE OF FINAL DISPOSAL OF THE DISPUTE OR LITIGATION.
Claims Applications on account of deceased account holders	Personal file relating to employees. The period of 10 years commences from the termination of the service for any reason whatsoever by death, retirement, resignation, dismissal. etc.	Records which relate to disputes or litigation pending in bills in the law court.
	Postal receipts and charges acknowledgement in respect of registered items sent.	
	<p>Matured fire policies and relative insurance cover notes.</p> <p>Bankers file (permanent till arrangement is in force)</p> <p>Correspondence files Acquittance registers. Attendance registers Delivery books Letters received books Casual leave registers Tappal Book Waste Sheet Records Outward Register TA, LFC , Hospitalization and Medical Bills (of workmen, officers and executives) after 10 years, before destruction, section should verify and if any case is pending such records have to be maintained till final disposal of the case.</p>	

APPENDIX - 6

PRESERVATION OF INSPECTION REPORTS

Inspection Report	At Circle Office	At Head Office
1. Branch Inspection / Audit Reports	Branch Inspection / Audit Reports together with replies to be preserved for a period of 8 years	--
2. RO/ Circle Office Inspection / Audit Reports	Inspection / Audit Reports together with replies to be preserved for a period for a period of 8 years.	Inspection Reports together with replies to be preserved at Inspection Wing HO for a period of 8 years
3. Head Office Inspection / Audit Reports / RBS / AFI related files	--	Inspection / Audit Reports on all Wings with replies thereto / RBS/ AFI related file is to be preserved at (i) Inspection Wing HO and (ii) respective Wings for a period of 8 years. AFI/RBS/RBI Inspection Reports /Notes/ related files to be preserved permanently.

Name of the files/records	Preservation Period
5. Inspection Manual and other manuals	Current manuals along with one set of its immediate previous edition to be preserved. (Extra copy of Manuals may be destroyed- Ref HO Circular 120/97 dated 6.6.1997)
6. a) HO Circulars / ID Circulars b) Sectional Circulars c) Special communications d) Confidential Circulars, etc. e) HO Memos	To be preserved permanently 10 years 10 years The title has to be reviewed. Permanent instructions should be segregated. Circulars regarding missing security items etc., to be destroyed after five years 5 years
7. Miscellaneous : i) Routine/miscellaneous correspondence serial copies of letters minutes of staff meeting, correspondence regarding empanelment of External Auditors, etc. ii) Old inspection report formats questionnaires / checklists, rough sheets, other printed / cyclostyled inspection formats etc. (which are not in use) iii) Important Books / Registers maintained at ZI - General Charges Slips/Register (maintained, if any, attendance, leave follow up register, Casual Leave Register, Inward Register for Inspection Reports / Letters etc. Programme Register, Medical Aid and Business Development Expenses Register etc.	Depending upon frequency of reference, ZI may make a review once in a year and take appropriate decision as to its preservation/destruction. Need not be preserved and hence may be destroyed. 10 years.



APPENDIX - 8

ILLUSTRATIVE LIST OF SECURITY ITEMS WITH REFERENCE TO THEIR PLACE OF STORAGE:

Group A - (items to be necessarily held in FBR Strong Room/FBR Safe)

- i) Cash including Single Lock Cash
- ii) Tappal Cash Box
- iii) Gold Jewellery
- iv) Articles accepted for safe custody
- v) Original and duplicate keys of the godowns
- vi) Single Lock Key (duplicate) of Tappal Box
- vii) Tokens
- viii) Double Lock Register/Cash Register/Security Register
- ix) Duplicate Double Lock Keys of other branches
- x) The contents and original list of inventory of items found in the lockers broken by the Bank.
- xi) Demand Draft continuous stationery
- xii) Debit Cards (Personalized and Non-personalized)/ other Cards specified
- xiii) Passwords of Branch-in-charge / admin password / ATM number lock details.
- xiv) Valuables / Cash found in branch premises.
- xv) Foreign Currency Notes pending remittance to FD.
- xvi) Duplicate Key of the Cheque Drop Box
- xvii) Cheques lying in Cheque Drop Box at the end of the day.
- xviii) DTAA forms obtained by NRIs
- xix) Information on filing of e-TDS Returns/Correction Statements.
- xx) Any other document/record specifically instructed to be kept in Strong Room / FBR Safe.
- xxi) All counterfeit Notes received back from the police authorities/Courts.



Group B - Items to be held either preferably in FBR/Strong Room/FBR Safe or in Fire Resistant Record Cabinet (which basically has a dual locking arrangement).

Double lock (securities) Register - NB.26 to be utilized for securities

- i) Loan papers executed by the borrowers
- ii) Agreements entered into between the Bank and the collecting Agents
- iii) Title deeds deposited with the Branch
- iv) RBI Inspectors' specimen signature
- v) I S C Parcels
- vi) ISC/IBC/FISC/Returned cheques/Returned Bills yet to be recovered
- vii) Cash Paid Vouchers/JPT
- viii) Certificates regarding the encashment of Foreign Currency / Foreign Travellers Cheques
- ix) Specimen signature sheet of officers
- x) Locked Steel Trunk containing instruments received for collection / clearing and held overnight including Cheques lying in Cheque Drop Box at the end of the day.
- xi) DATs, Tapes, Hard Disks, Compact Discs (CD) etc., containing records/data which are purged/archived from the current data base and not available for online usage.
- xii) Receipts obtained from P&T Dept., Electricity Board, Water Supply Dept., etc., towards advance rent/deposit for securing a Post Box/Post Bag, Postal Franking Machine, Electricity Connection, Water Connection, etc.



Group C - Items to be held (either preferably in FBR Strong Room/FBR Safe/Fire Resistant Record Cabinet OR) in cup board with dual locking arrangements.

- i) SB, CA, Term Deposits, Internet/Mobile Banking requests, etc., Application Forms (executed)
- ii) Specimen signature cards of inoperative and NIEI Accounts.
- iii) Cheque Books, Loose Cheque and Welcome Kits.
- iv) Deposit Receipt Continuous Stationery.
- v) NND / NNND collection slips.
- vi) Unused Godown Locks and keys.
- vii) Specimen of other Banks' Travellers Cheques.
- viii) Banks Monogram.
- ix) Unused Locks and Keys.
- x) Specimen signature cards of inoperative SB and CAs.
- xi) Cash Requisition slip for cash indent.
- xii) File containing cancelled security items along with the relative note books.
- xiii) Balancing Books (NB 13) of security items.

NOTE:

- 1) The above items are arranged serially basing on their intrinsic security value. The items of lower intrinsic value could always be held with those with higher intrinsic value in the higher group. If space permits, items in Group C could be held with Group A or Group B. Similarly, items in Group B could be held with Group A.
- 2) The above list is only illustrative and not exhaustive. Branches/Offices to ensure safe keeping of all security items taking into account the risk factors attached to each item.



APPENDIX-9

PRESERVATION OF DOCUMENTS UNDER PREVENTION OF MONEY LAUNDERING (MAINTENANCE OF RECORDS) RULES, 2005

The following records should be maintained for **at least 5 years** from the date of cessation of transactions between the bank and the client.

- 1) All cash transactions of the value of more than Rs.10 lacs or its equivalent in foreign currency.
- 2) All series of cash transactions integrally connected to each other which have been individually valued below Rs.10 lacs or its equivalent in foreign currency where such series of transactions have taken place within a month and **monthly aggregate exceeds an amount of Rs.10 lacs or its equivalent in foreign currency.**
- 3) All transactions involving receipts by non-profit organizations of value more than Rs.10 lacs or its equivalent in foreign currency.
- 4) All cash transactions where forged or counterfeit currency notes or bank or bank notes have been used as genuine and where any forgery of a valuable security **or a document** has taken place facilitating the transactions.
- 5) All suspicious transactions whether or not made in cash and by way of -
 - a) Deposits and credits, withdrawals into or from any accounts in whatsoever name they are referred to in any currency maintained by way of:
 - i) Cheques including third party cheques, pay orders, demand drafts, cashiers' cheques or any other instrument of payment of money including electronic receipts or credits and electronic payments or debits or
 - ii) Travellers cheques, or
 - iii) Transfer for one account within the same banking company, financial institution and intermediary, as the case may be including from or to Nostro and Vostro accounts, or
 - iv) Any other mode in whatsoever name it is referred to.
 - b) Credits or debits into or from any non-monetary accounts such as demat account, security account in any currency maintained by the banking company, financial institutions and intermediary, as the case may be;
 - c) Money transfer for remittances in favour of own clients or non-clients from India or abroad and to third party beneficiaries in India or abroad including Transactions on its own account in any currency by any of the following:



- i) Payment orders, or
 - ii) Cashiers Cheques, or
 - iii) Demand Drafts, Telegraphic or wire transfers or electronic remittances or transfers, or
 - iv) Internet transfers, or
 - v) Automated Clearing House Remittances, or
 - vi) Lock box driven transfers or remittances, or
 - vii) Remittances for credit or loading to electronic cards, or
 - viii) Any other mode of money transfer by whatsoever name it is called.
- d) Loans and advances including credit or loan substitutes, Investments and contingent liability by way of:
- i) Subscription of debt instruments such as commercial paper, certificate of deposits, preferential shares, debentures, securitized participation, **interbank participation** or any other investments in securities or the like in whatever form and name it is referred to, or
 - ii) Purchase and negotiation of bills, cheques and other instruments, or
 - iii) Foreign exchange contracts, currency, interest rate and commodity and any other derivative instruments in whatsoever name it is called, or
 - iv) Letters of credit, standby letters of credit, guarantees, comfort letters, solvency certificates and any other instruments for settlement and/or credit support.
 - v) Collection services in any currency by way of collection of bills, cheques Instruments or any other mode of collection in whatsoever name it is referred to.
- 6) **All cross-border wire transfers of the value of more than Rs.5 lacs or its equivalent in foreign currency where either the origin or destination of funds is in India.**
- 7) **All purchase and sale by any person of immovable property values at Rs.50 lacs or more that is registered by the reporting entity, as the case may be.**

The records of transactions, both domestic and international, shall contain necessary information specified by the regulator to permit reconstruction of individual transaction including the following information:

1. The nature of transactions;
2. The amount of the transaction and the currency in which it was denominated;
3. The date on which the transaction was conducted; and
4. The parties to the transaction.

The above said records are to be preserved in a manner that allows data to be recovered easily and quickly wherever required or when requested by the competent authorities.

APPENDIX - 10

DEPOSITORY SERVICES -PERIOD OF MAINTENANCE AND PRESERVATION OF RECORDS

Sl No	Particulars of records for maintenance in respect of depository activities/operations	Period of preservation
1	Account opening forms with all enclosures, attachments, and also requests from clients for changes in master data like change of signatures, change of Bank account details, change of address, all types of business correspondence etc.,	Permanently date wise
2	Office copies of Demat request forms and relative computer printout have to be maintained and preserved date-wise	For minimum period of 6* months from the date of dematerialisation.
3	Delivery Instruction slips, both intra depository and inter depository, processed by the DP have to be preserved and maintained date-wise	For a minimum period of 5* years from the date of execution.
4	Requests from clients for freezing and de freezing their accounts / securities have to be maintained and preserved date-wise.	For a minimum period of 5* years from the date of freezing/ defreezing.
5	Pledge initiation / confirmation / closure / closure confirmation / unilateral pledge closure request forms processed by the DP have to be maintained and preserved date-wise.	For a minimum period of 5* years from the date of cessation of the transaction.
6	DPs shall maintain and preserve the record of documents evidencing the identity of its clients and beneficial owners (e.g., copies of records of official identification documents like passports, identity cards, driving licenses or similar documents) as well as account files and business correspondence	For a period of 5* years after the Business relationship with the client has ended or the account has been closed, whichever is later.
7	In situations where the records relate to ongoing investigations or transactions which have been the subject of a suspicious transaction reporting.	Shall be retained until it is confirmed that the case has been closed.

Sl No	Particulars of records for maintenance in respect of depository activities/operations	Period of preservation
8	Records of information related to transactions, whether attempted or executed, which are reported to the Director, Financial Intelligence Unit - India as required under Rule 7 & 8 of the PML Rules	For a period of five* years from the date of transactions between us and the client.
9	Records pertaining to transactions of clients	5 years
10	Records relating to all complex, unusually large transactions/patterns which appear to have no economic purpose along with the background, including all documents, office records/memorandums/clarifications sought pertaining to such transactions and purpose thereof together with findings recorded in writing and related	5 years

***The minimum period of maintenance and preservation of records stipulated above are minimum requirements in accordance with the guidelines issued by SEBI. However, as per the Right to Information Act or any other Acts, if the records have to be maintained for longer periods, the same should be adhered to by DPs.**



APPENDIX - 11 UNIQUE RECORD IDENTIFIERS

A unique record identifier is a numeric or alphanumeric string that is associated with a single entity i.e. an e-record within a given system. The unique record identifier serves as a “filename” for an e-record. Thus, it is persistently linked or associated with the e-record so as to help in its reference, location, identification, authentication, access and control.

Examples of common elements in the unique record identifier

A unique record identifier can be generated by selecting any 3 to 4 relevant elements from the examples given below:

- ✓ Name of branch/office.
- ✓ Type of document.
- ✓ Service code.
- ✓ Accession number or registration number or reference number.
- ✓ Place.
- ✓ Date of creation.
- ✓ Name of creator / branch/ office.
- ✓ Description or title of content.
- ✓ Release date.
- ✓ Publication date.
- ✓ Project number.
- ✓ Department / Section number.
- ✓ Records series.
- ✓ Version number.
- ✓ Other domain specific elements preferred by the organization.

Benefits of assigning unique record identifiers to e-records:

Following are the benefits of assigning the unique record identifiers to e-records -

- i) It serves as a kind of metadata about the e-record.
- ii) It helps in locating the e-records.
- iii) It helps in establishing the referential integrity of e-records and distinguishing between versions.
- iv) The digital rights and access controls are directly linked with the unique identifier of e- record.
- v) It helps in ensuring the trustworthiness and legal admissibility of an e-record.
- vi) The documents and folders associated with an e-record also use the derivatives of its unique identifier.
- vii) It helps in parsing the e-records for meaningful classification or various batch operations.
- viii) It is not possible to aggregate the e-records in a trustworthy digital repository unless they have unique identifiers.

Classification: Internal



APPENDIX - 12 SOP FOR DIGITISATION OF RECORD

Digitisation is act of scanning a physical document into digital form, as well as the series of activities that result in a digital copy being made available to end users through intranet or other means for a longer period of time. Digitisation of physical records forms an integral part of any Document Management Policy.

Physical documents may be digitized to protect them from the risk of damage or destruction, which may result in the loss of the record. Further, digitization may be an effective way to maintain and manage physical documents/ records.

Role of Head Office:

GA Wing: At HO, a Committee shall be formed comprising users from various functional Wings of HO for discussing & finalizing the process of Digitisation of documents/ records in the Bank. GA Wing shall be the convenor of the Committee.

DIT Wing: Wing shall provide & maintain the storage hardware and develop package for maintenance & management of digital documents.

Process flow: Digitisation of records shall involve following steps:

1. **Identification of documents/ records for digitisation:** At HO, Sections of various functional Wings shall identify the documents/ records for digitisation. The list of such documents/ records shall be approved by the DGM of the Wing. Similarly, for digitisation of records at branches, various functional Wings shall identify & provide the list of the documents/ records for digitisation.
2. Segregation of documents/ records as per the Bank's guidelines on preservation of records.
3. **Scanning of physical records:** The identified records shall be scanned in format, size etc as defined by the Bank. It shall be ensured that the readability of scanned records is not compromised. Bank may also specify whether the scanning process to be done in-house or to be outsourced. An inventory of the documents shall be prepared, especially in cases where the actual digitization is performed by outsourced agencies. Utmost care shall be taken for scanning of old, delicate & fragile records.
4. The scanned records shall be named based on the nature of records.
5. **Platform for maintenance & management of digital documents:** Bank shall develop a package for maintenance & management of digital documents. The package shall work on Maker - Checker concept. The scanned records shall be



uploaded into the package and categorized based on the nature of records, accessibility, confidentiality of records etc.

6. **Generation of Unique Record Identifiers:** After approval of uploaded documents by the Checker, a unique record identifier shall be generated by the system. The same shall be noted on the physical record for future reference.
7. **Storage of scanned records:** The scanned records shall be stored in Bank's own server and categorized based on the nature of records (permanent/ non-permanent), accessibility, confidentiality of records etc. The Bank has formulated Information Security Policy and Information Security Guidelines covering e-Record Maintenance, Preservation/Storage. Digitisation shall adhere to the guidelines detailed therein. Security measures shall be ensured to prevent manipulation and unauthorized deletion of scanned records. Regular back up shall be ensured
8. **Retrieval of records:** Only authorized Officers shall have the access to retrieve the records related to his/ her work area. Access to records shall be restricted based on the nature of records, accessibility, confidentiality of records etc. Officials shall only be able to view and not be able to edit or save the records. Admin users shall be able to save and share the digital records. While saving the records, each record shall be watermarked with staff number of the user, date & time of retrieval of records. A user access log shall be maintained for accessing and sharing the records.
9. **Storage of physical records after digitisation:** After digitisation, the physical records shall be moved to a centralised storage facility which may be Bank owned or outsourced.
10. **Destruction of digital records:** Digital records shall be disposed duly complying with the retention period stipulation for each underlying physical records. In this regard, compliance to legal/ regulatory guidelines shall be ensured.

General Points:

1. A register shall be maintained at Branches/ Offices wherein details of digitisation of documents/ records shall be maintained along with the details of movement of physical records to centralised storage facility. Balancing of register shall be done every quarter with available physical records.
2. Inspecting Officers shall verify the balancing taken during RBIA.
