

Policies and Procedures

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Records Management policy

Policy Number:	1.6.4.03
Responsible Officer:	Vice-Chancellor and President
Policy Editor/Contact:	Manager, Records Management
Approving Authority:	Vice-Chancellor and President
Effective Date:	31 January 2017
Date approved:	31 January 2017
Review by:	31 January 2019

This policy has the following schedules:

Schedule: USP Retention and Disposal Schedule

Part I – USP Functional Disposal Schedule

Part II – USP Disposal Schedule for Financial and Accounting Records

Part III – USP Disposal Schedule for Human Resource Management Records.

1. Purpose

The Records Management policy prescribes the management of record assets to ensure that they are managed in a systematic, efficient and controlled way to ensure accountability, effective governance and legal compliance.

The policy aims to be comprehensive, bringing previous related but separate policies together to describe the life-cycle of a record. As such the policy includes several sections, each related to a different but essential component to achieve effective records management outcomes. Sound records management functions act as a risk mitigating tool and so proper records management is therefore critical for successful risk management.

2. Objective

The policy articulates the fundamentals of the Records Management framework and establishes the environment in which official records and documents of the University are created, captured and managed. It identifies roles and responsibilities for the safe-guarding of the record assets of the institution and articulates the principles underpinning the processes outlined in supporting documentation (such as Procedures, Schedules, Good Practice Guidelines, and Information Sheets).

The Records Management policy establishes the conditions under which records concerning decisions, transactions and the activities of the University are created, captured, maintained, accessible, and disposed of in a manner that meets the strategic and operational needs of the University, including accountability, transparency and information evidence needs.

The requirements contained within this policy apply equally to hard-copy records and electronic records, whether contained within the University's electronic document and records management system – currently *HP Records Manager*, or elsewhere, including business information systems, such as *Banner*.

The policy outlines roles and responsibilities for all University employees to facilitate compliance with the requirements of the relevant Public Records Act and Freedom of Information Act for each member country.

3. Definitions

Word/Term	Definition
Archive	Archives contain records and ephemeral material that have been naturally and necessarily generated as a product of regular legal, commercial, administrative or social activities.
USP Archive	The USP Archive contains material created or received by a person in the conduct of their affairs on behalf of the University and preserved because of the enduring value contained in the information they contain or as evidence of the functions and responsibilities of their creator, especially those materials maintained using the principles of provenance, original order, and collective control.
Classification Scheme	A Classification Scheme means a hierarchical system of classification that reflects the business functions and activities of the University, and provides the framework for how University records are categorised. The Classification Scheme contains terms and scope notes that represent and describe the business functions of the University and show the relationship between the different levels of terms. The Scheme is a formative part of the EDRMS and the Retention and Disposal Schedule.
disposal	<p>A controlled and authorised process by which records are either:</p> <ol style="list-style-type: none"> 1. destroyed in a secure way to ensure confidentiality up until the moment of destruction; or 2. transferred to the USP Archive. <p>NB: Disposal does not necessarily mean destruction; records can be disposed of either by destruction or transfer to the USP Archive.</p>
Electronic Document and Records Management System (EDRMS)	An EDRMS captures records, protects integrity and authenticity, provides access through time, appropriately disposes of records no longer required, and ensures that records of enduring value are retained. The University's EDRMS is HP Records Manager and is used to manage business information including administrative (including HR and Finance), research, teaching, and student administration, regardless of format.
HP Records Manager (HPRM)	HP Records Manager is the University's principal record keeping system, developed by Hewlett-Packard (HP). It includes a classification scheme, retention & disposal functionality, a vital records database and the ability to track information across the University. It also has the capacity to integrate with other business systems, as well as Microsoft Office. A reference to HPRM will be taken to include any future system adopted by the University as the University's official record keeping system and the name of any future product should be substituted.
inactive record	An Inactive Record refers to a record that is no longer required for administrative or other purposes on a regular basis and/or the subject matter is no longer current but the record is required to be retained under the USP Retention and Disposal Schedule

Word/Term	Definition
metadata	<p>Metadata describe context, content and structure of records and their management through time. It enhances the usability of a record by providing information needed for an understanding of the transactions that created and used them.</p> <p>When used in the context to describe electronic records it includes the structure that supports the electronic record, e.g. directory tree or index or software information.</p>
record	<p>A record is recorded information in any form “created or received and maintained as evidence and information by an organisation or person, in pursuance of legal obligations or in the transaction of business”.</p> <p style="text-align: right;">AS ISO 15489.1:2002 Records Management</p>
Retention and Disposal Schedule	<p>Retention and Disposal Schedules are the control documents that set out the periods for which the University’s business records should be retained and the manner in which they may be disposed.</p> <p>The University operates under three Retention and Disposal Schedules, i.e. the Functional Disposal Schedule; the Disposal Schedule for Financial and Accounting Records; and the Disposal Schedule for Human Resource Management Records. Collectively they form The USP Retention and Disposal Schedule.</p>
Vital Record/s	<p>Vital Record/s are a subset of all records; they are deemed essential (vital) to resume or continue operations of the University, and include records necessary to recreate the University’s legal and financial position.</p>

4. Policy provisions

Records Management policy shall apply to records in any medium, including electronic records. This policy applies to all aspects of the University’s business, including all records created by, received by, sanctioned by, or proceeding from an individual acting within their designated capacity. Records created, whether hard copy or electronic (soft) copy, are to be managed as per the requirements of this policy.

The University endorses the following Records Management Principles¹ to maintain compliant and accountable recordkeeping:

- Recordkeeping must ensure the University is compliant and accountable in all areas of business;
- Recordkeeping must be monitored and audited for compliance;
- Recordkeeping activity must be assigned (to specific officers) and implemented;
- Recordkeeping must be managed;
- Recordkeeping systems must be reliable and secure;
- Recordkeeping must be systematic and comprehensive; and,
- Full and accurate records must be made and kept for as long as they are required for business, legislative, accountability and cultural purposes. To meet this principle,

¹ Queensland Government Information Standard 40 - Recordkeeping

records must be created, captured, adequate, complete, meaningful, accurate, authentic, inviolate, accessible, useable, retained and preserved.

Note: Electronic messages (not limited to email) are to be treated as documents and may, therefore, become records. Increasingly, decisions are being communicated via email, and other forms of electronic communication, and must be captured into a record keeping system.

4.1 What is a record?

A record is recorded information in any form “created or received and maintained as evidence and information by an organisation or person, in pursuance of legal obligations or in the transaction of business”.² An official University record, therefore, is information created, received, or sanctioned, and maintained, by a staff member in the course of conducting business on behalf of the University acting within their designated capacity (position) regardless of format (paper, electronic, audio-visual). They are not duplicates and should be captured to ensure that the University has records that:

- Relate to, document, or provide evidence of business activities of an individual staff member, Faculty or organisational unit, or of the University as a whole;
- Record decisions, decision-making processes, advice and/or direction; and,
- Support the corporate memory of an organisational unit, a Faculty and/or the University as a whole.

4.2 Creation and capture

Creation and capture is the process of determining whether a record should be made (created) and kept (captured). The information contained within it must be able to reconstruct activities or transactions that have taken place. Records must be created when there is a need to be accountable for decisions, actions or outcomes. Staff members are required to create records which adequately document the activities and decisions of the University in which they take part and capture these records in the University’s record keeping system.

Electronic records must not be captured in an encrypted or password-protected form.

4.3 Accessible and accurate

A record must be locatable when information is required. This is important to support the efficient operation of the University’s business, but vital in areas where Freedom of Information legislation has been enacted. If required the University must be able to establish a record’s context, who created it, to which part of which business process does it belong and how it relates to other records. This will ensure that the University is able to demonstrate accountability and transparency.

The University must have confidence in its records and therefore they must be trusted. Each staff member who accesses a record must have confidence that it reliably represents the information that was actually used in or created by the business process. Records provide ‘official’ evidence of the activity or transaction they document and must therefore be reliable and trustworthy. Staff must capture records which accurately provide what was done, communicated or decided.

² AS ISO 15489: Part 1: 2016. Records Management

4.4 Ownership

The University has a general claim of ownership of records created or received by University staff in the course of their duties, and subject to its control. This does not invalidate other claims of ownership, such as copyright and/or intellectual property rights. Employees leaving the University, or changing positions within it, must undertake steps to ensure that all records created, received and used are returned, filed and secured appropriately, including electronic records.

4.5 Record keeping system – *HP Records Manager*

The University's secure electronic document and records management system (currently *HP Records Manager*) is the principal record keeping system of the University. It assists University staff to capture records, protects integrity and authenticity, provides access through time, appropriately disposes of records no longer required by the University, and ensures that records of enduring value are retained. *HP Records Manager* facilitates the creation, version control and authority of official records of the University. Control measures, such as access monitoring, user verification, authorised disposal and destruction and security are implemented to prevent unauthorised access, destruction, alteration or removal of records.

4.6 Business information systems

University records are not exclusively contained within the electronic document and records management system – *HP Records Manager*. Records are also contained within other record keeping systems, throughout the University, including databases and business information systems, such as *Banner*.

As these systems have a records keeping function they must also be managed to meet the needs of this policy, and associated documents. The Retention and Disposal Schedules apply equally to these systems and University records must be maintained for the prescribed period, and/or be migrated to successor systems.

4.7 Metadata

Metadata describe context, content and structure of records and their management through time. It enhances the useability of a record by providing information needed for an understanding of the transactions that created and used them. Not all documents by themselves are able to provide a complete and accurate representation of a specific event or transaction, especially electronic records; hence, metadata is embedded within, attached to, or associated with, a specific record. The collection of metadata applies across all file formats, regardless of media, and staff will be expected to capture appropriate metadata once minimum requirements have been agreed to

A format for metadata collection/ minimum requirements of metadata will be established by the University and will be widely communicated.

5. Responsibilities

The Records Management policy articulates standards expected of record keeping at The University of the South Pacific. All staff of the University will create and maintain full and accurate records of the University's business activity, in accordance with normal, prudent business practice, and capture them in a record keeping system.

To achieve effective record management outcomes the University has assigned responsibilities to designated individuals and/or groups. The Vice-Chancellor has overall

responsibility for ensuring that the University meets its statutory and accountability requirements. The oversight of the administration of University records is vested in the Records Management office through this policy, and associated documents, to support the University's strategic goals and ensure that the University is compliant with relevant legislation and best practices for effective record management.

Role/Office	Responsibility
Vice-Chancellor and President	<p>The Vice-Chancellor has overall responsibility for ensuring that the University fulfils its legal and business obligations in relation to record keeping and that adequate resources are available for managing and maintaining University records.</p> <p>The Vice-Chancellor is responsible for ensuring that the University has in place a Records Management policy that complies with the requirements of the relevant Public Records Acts and Freedom of Information Acts for each member country.</p>
Secretary to Council	<p>The Secretary to Council is delegated to approve the disposal of records which tend to be ephemeral and incidental in nature and have short-term value. These records have a retention period of three years or less, as defined within the USP Retention and Disposal Schedule.</p>
Senior Management Team	<p>Responsible for policy implementation for areas within their respective portfolios. This includes making available appropriate resources to manage and maintain University records.</p>
Heads of Schools/ Sections/ Institutes/ University organisational units, and Campus Directors	<p>Heads are required to facilitate and promote the establishment and resourcing of appropriate record keeping systems in accordance with this policy. They are to ensure that staff members have a clear understanding of record keeping requirements for their business area and provide access to adequate training and education, where required. They are accountable for ensuring that staff members adhere to the provisions of this policy.</p>
University staff	<p>All staff members have a responsibility to ensure that University records that they create, receive and use as part of their business role are complete, accurate and managed in accordance with this policy and associated procedures and other circulated documentation.</p> <p>All staff members are responsible for preventing any unauthorised access to records and ensuring that personal or sensitive information is protected.</p>
Departing staff and Supervisors	<p>When a staff member leaves the University the staff member and the immediate supervisor must each ensure that all records created, received and used by the departing staff member are returned and secured appropriately, including electronic records.</p>
Records Management	<p>The Records Management office is responsible for issuing</p>

Role/Office	Responsibility
staff	<p>policy, procedures and guidelines, education, training and advice to assist areas to conform to the requirements for University record keeping and this policy and associated documents.</p> <p>Records Management staff are also responsible for the configuration, development, implementation, training and support for the electronic document and records management system (EDRMS) – currently <i>HP Records Manager</i> – or any future system, as well as the provision of general records management education and training.</p> <p>In addition, the Records Management office manages and operates the USP Archive on behalf of the University.</p>
IT Services	<p>ITS is responsible for maintaining technology that supports the University’s records management framework, databases and systems on which records and information is stored including developing and maintaining appropriate system accessibility, security, backup and disaster recovery, planning and testing.</p>

6. Security, access and confidentiality

The University is responsible for ensuring that records remain accessible to people with appropriate authority both inside and outside the University, for the designated retention period. The University is also responsible for ensuring that its records are safeguarded to ensure privacy and confidentiality and prevent unauthorised use or access to its records.

All staff are personally accountable for the correct management of documents and records (including electronic records) generated in the course of their duties or under their direct control. Staff will access only those records which are necessary for the fulfilment of their duties as a member of staff, or that they are lawfully requested to access.

6.1 Privacy principles, Freedom of Information and Public Records Acts

The University of the South Pacific, operating in independent countries, is cognizant of the need to meet local legislative requirements with regards to access to records and, in particular, Freedom of Information legislation, and Public Records Acts, or equivalent (where it exists).

6.2 Restructure of a University organisational unit

In the event of a restructure within the University which results in the cessation of an organisational unit the departmental head is required to ensure the proper management and appropriate transfer of records prior to the closure of the unit. The head of department will make contact with the Manager, Records Management within a reasonable timeframe to enable the provision of appropriate advice and guidance regarding the storage, transfer or otherwise of University records.

7. Vital Records

Vital Records are those that protect the University’s rights. They are a sub-set of all records created for and on behalf of the University and generally are those that protect rights and entitlement; they are those records that the University would require to recover from disaster.

In essence they establish and protect the rights and interests of the University and its employees, students, customers and stakeholders at all times.

Vital Records will be lodged with the Records Management office to enable quarantine in a single repository, under protection and with appropriate access. The Records Management office will maintain a register of Vital Records. This register is populated from data provided by organisational units and the record itself.

8. Retention and disposal

The retention and disposal of records is authorised through this policy and the accompanying schedules. The USP Retention and Disposal Schedule is the control document that sets out the periods for which University's business records should be retained and the manner in which they may be disposed. The schedule is utilised as the basis for business classification modelling performed for each organisational unit by Records Management to ensure that the appropriate records are captured into the record keeping system and retained for only as long as they have value as a record to the University, after which they will be disposed through controlled processes. Disposal does not necessarily mean destruction; records can be disposed of either by destruction or transfer to the USP Archive. Staff members who wish to initiate the disposal of records should contact the Records Management office in the first instance.

The Schedule states recommended retention periods primarily based on best practice and relevant legal requirements. In some instances, staff may justify applying for longer retention periods where other business factors require consideration, such as an audit investigation or pending or current legal action. Where local legislation requires that a certain type of record be kept for a period less than that which is prescribed in the University's Retention and Disposal Schedule, the University's retention period shall prevail and the record will be kept for the period outlined in the University's Retention and Disposal Schedule.

University records must not to be destroyed or disposed of without authority:

- (i) No person shall destroy or otherwise dispose of, or authorise the destruction or other disposal of, any University record of any kind whatsoever that is in their possession or under their control, except with the proper consent as per this policy and given in accordance with the provisions of this policy.
- (ii) Before authorising the destruction of any University record or any class thereof, the Manager, Records Management may consult with any person whom they consider qualified to provide advice as to the value thereof for permanent preservation.

8.1 Register of records disposal

A register of records disposal will be kept by the Records Management office for the purposes of accountability. This register is a permanent record of the University.

8.2 Responsibility for disposal

The Vice-Chancellor is the designated University Officer with responsibility to authorise the disposal of University records. Through this policy the Secretary to Council has been delegated to approve the disposal of those records which have a retention period of three years or less; these records tend to be ephemeral and incidental in nature and have short-term value.

Records to be retained permanently will be transferred to the USP Archive.

9. Compliance

The Records Management office will conduct periodic compliance reviews across the University. A review is conducted to identify and assist staff to:

- (i) appreciate their role in records management practices;
- (ii) identify education or training needs;
- (iii) alert the Records Management office to inconsistencies in either,
 - a. records management practices across the University, or
 - b. vagueness or otherwise in the Records Management policy and related documents;
- (iv) identify good practice examples for sharing across the University; and,
- (v) identify breaches.

A compliance review is not conducted as a punitive exercise.

The Secretary to Council is the official custodian of University policies and will be responsible for ensuring and measuring compliance along with the Vice-Chancellor and designated Responsible Officers.

10. Archive

Archives provide a record of the corporate memory of the University. They are principally inactive records, although archival material may not necessarily be records in the general sense of the meaning. Archival material may include, but not limited to, records, ephemeral items, gifts from visiting dignitaries, photographic and other audio-visual media. The USP Archive is the repository of those records deemed significant to the University and the broader community. The materials contained within are selected for permanent preservation on the basis of their historical, legal, administrative and, or financial value.

Where records are recommended for transfer to the USP Archive, arrangements should be discussed with the Manager, Records Management in the first instance.

The governance of the USP Archive is significantly broad with regards to administration and management; as such the USP Archive is covered in a separate policy document – USP Archive policy.

11. Related documents

USP Policy, Procedure, Schedule documents

USP Retention and Disposal Schedule

Part I – USP Functional Disposal Schedule (FDS)

Part II – USP Disposal Schedule for Financial and Accounting Records (DSFAR)

Part III – USP Disposal Schedule for Human Resource Management Records (DSHRM)

USP Archive policy

USP Forms

Records Disposal Notification form

Vital Records Lodgement form

HP Records Manager Folder Access Request form

Legislation and external supporting documents

The University will comply with relevant legislation that applies to records in each member country, in particular Public Records Acts and Freedom of Information Acts, or their

equivalent. In the absence of local legislation the University's policies will preside for the purposes of University record keeping requirements.

AS ISO 15489 Part 1:2016. Records Management.

AS ISO 15489 (.1), (.2), & (.3): 2002. Records Management.

ISO 30300 – 2012: Management systems for recordkeeping.

Smith, K. (2007). *Public Sector Records Management. A Practical Guide*. Aldershot, U.K: Ashgate.

Queensland Government Information Standard 40 – Recordkeeping.

The University of the South Pacific thanks those universities who have made documents available that have contributed to the content of this policy.

RECORDS MANAGEMENT/31 JAN 2017