# Records Management Policy

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<th>Approving authority</th>
<th>Vice President (Corporate Services)</th>
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<td>Approval date</td>
<td>2 September 2014</td>
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<td>Advisor</td>
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**Description**
The records management policy provides a University-wide framework for the creation, systematic capture, registration, classification, use, storage, disposal and retention of University records in accordance with the legislative requirements, standards and best practices which are applicable to the business activities of the University.

**Related documents**
- Business Classification Scheme
- Destruction of Digitised Records
- Disposal Authority Form
- Griffith University Code for the Responsible Conduct of Research
- Information Security Policy
- Staff Confidentiality Agreement
- University Sector Retention and Disposal Schedule

**External Links:**
- Disaster Preparedness and Response for Public Records Guideline
- Electronic Transactions (Queensland) Act 2001
- Evidence Act 1977 (Qld)
- Financial Accountability Act 2009 (Qld)
- Financial and Performance Management Standard 2009
- General Retention and Disposal Schedule for Administrative Records
- Information Privacy Act 2009 (Qld)
- Information Standard 18: Information Security (IS18)
- Information Standard 31: Retention and Disposal of Government Information (IS31)
- Information Standard 34: Metadata (IS34)
- Information Standard 40: Recordkeeping (IS40)
- Judicial Review Act 1991 (Qld)
- Public Records Act 2002 (Qld)
- Right to Information Act 2009 (Qld)
1. **WHAT IS A UNIVERSITY RECORD?**

A University record is information created, received and maintained by its staff in the course of conducting its business, regardless of its format (paper, electronic, audio-visual). The University's business encompasses all forms of its teaching and learning, research, community service, organisational, commercial and cultural activities. All business activities are appraised to identify what records should be created and the life of those records determined in order to:

- Protect the rights and interests of individuals at the University
- Explain and justify the actions of the University and its employees
- Document and explain the decision-making of the University
- Provide the history of an activity
- Determine that the policies and procedures of the University were followed during the conduct of that business

Therefore a record must show: what occurred; when it occurred; how it occurred; what the transaction was; who participated and what was the outcome.

A document or an e-mail in a physical or electronic form created but not transmitted or submitted is not considered a record. A conversation only becomes a record if a written note of that conversation is made. The relevant officer should use his/her judgement as to whether a written note of a conversation should be made bearing in mind the foregoing explanation of what constitutes a University record.

2. **LEGISLATION**

As a statutory body established under the Griffith University Act 1998, the University is subject to the following:

2.1 **Legislation and Regulations**

- Public Records Act 2002 (Qld)
- Electronic Transactions (Queensland) Act 2001
- Right to Information Act 2002 (Qld)
- Information Privacy Act 2009 (Qld)
- Judicial Review Act 1991 (Qld)
- Evidence Act 1977 (Qld)
- Financial Accountability Act 2009 (Qld)

2.2 **Policies and Standards**

- AS ISO 15489 Australian Standard Records Management Parts 1 and 2, Standards Australia, 2002
- Information Standard 18: Information Security (IS18)
- Information Standard 31: Retention and Disposal of Government Information (IS31)
- Information Standard 34: Metadata (IS34)
- Information Standard 40: Recordkeeping (IS40).

3. **ROLES AND RESPONSIBILITIES**

Griffith University with all its employees is subject to legislation relating to records management. The Vice Chancellor, as Chief Executive Officer, is responsible for ensuring that the University complies with the cultural, business, legislative and accountability requirements.
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. All University records should be protected from unauthorised access, disclosure, modification, loss or damage.

The staff of Corporate Records and Digitisation Services (CDRS), under the direction of the Manager, Corporate Information, has primary responsibility for the implementation of the legislative requirements and of AS ISO15489 Australian Standard: Records Management for record keeping and archiving within the University. They are also responsible for training users on records management and records systems operations as they affect individual practice.

4. RECORDS MANAGEMENT SYSTEM

The University uses and maintains a records management system that is secure from unauthorised access, damage and misuse. The system captures and support records that are accurate, authentic, accessible, useable, retained, and preserved. The system is capable of continuous and regular operation and is managed in compliance with all requirements arising from current business processes, the regulatory environment and community expectations.

The records management system:
- routinely captures all records within the scope of the business activities of Griffith University;
- organises the records in a way to reflect the business processes of the record's creator;
- protects the records from unauthorised alteration or disposition;
- routinely functions as the primary source of information about actions that are documented in the records; and
- provides ready access to all relevant records and related metadata.

Control measures, such as access monitoring, user verification, authorised destruction and security are implemented to prevent unauthorised access, destruction, alteration or removal of records.

5. ACCESS AND SECURITY

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 also has in place mechanisms to safeguard privacy and confidentiality and prevent unauthorised use or access to its records.

It is the expectation of the University that a member of staff will access only those files and records which are necessary for the proper fulfilment of the duties of that member of staff, or that they are lawfully requested to access. Staff handling sensitive classified information will be asked to acknowledge their responsibilities in writing. All staff working in CARMS and all staff in the Office of Human Resource Management (HRM) will sign a confidentiality agreement at the commencement of their employment in either CRDS or HRM.

In accordance with the University's Guidelines for Access and Disclosure of University Staff Files, staff files may only be released to authorised HRM staff, or to the Vice Chancellor (or nominee/s), or to the Vice President (Corporate Services) (or nominees), or to the legal staff of the Legal Services Unit. Confidential information contained within HRM files is to be disclosed only by an authorised HRM staff member, or the Vice Chancellor, or the Vice President (Corporate Services).

To prevent unauthorised disclosure of information, access to CDRS areas is restricted to authorised staff.

6. PRIVACY PRINCIPLES

In accordance with the Information Privacy Act 2009 (Qld) CRDS takes measures to ensure the security of personal information, to protect it against loss, unauthorised access, use, modification or
disclosure, and against any other misuse. If it is necessary to give the record to a third party, CARMS will take every reasonable step to ensure that the recipient of the record will also safeguard the personal information.

In its day-to-day operations, CRDS acts in accordance with the University's Guidelines for Access and Disclosure of University Staff Files, which it administers jointly with the Office of Human Resource Management.

7. **RIGHT TO INFORMATION**

Under the *Right to Information Act 1992* (Qld), every person has a legally enforceable right to obtain access in accordance with this Act to a document of Griffith University, other than an exempt document. The person's right of access is not affected by any reason the person gives for seeking access.

Records containing personal information about:

- an employee or former employee of the University that are, or have been, kept by the University for HR management purposes
- a student or former student that are, or have been kept by the University for student administration purposes

are accessible to the person concerned (i.e. the subject of the record) in accordance with the Procedure for Accessing Staff and Student Files. Members of staff and students wishing to view their own file should make application to the Office of Human Resource Management or Student Administration Centre who will arrange for this to occur under their supervision.

8. **TECHNOLOGY-DEPENDENT RECORDS**

Technology-dependent records, including electronic records, micrographic records and audio-visual records, generated or received in the course of business are public records and are created, maintained and accessible for as long as they are required to meet legislative, accountability, business and cultural obligations.

Electronic messages that are evidence of business activity are printed and filed, with appropriate contextual detail. These details include as a minimum: author, author's title and organisation, receiver, receiver's title and organisation, date and time of sending or receipt of message.

Business messages with limited information-only value and purely private transactions that do not provide a record of a business transaction are considered ephemeral or non-records and do not need to be captured into a recordkeeping system.

9. **BUSINESS CLASSIFICATION SCHEME**

University Records are classified and files are titled in accordance with the Griffith University Business Classification Scheme. The Business Classification Scheme is maintained and reviewed annually by CRDS to ensure that it is relevant to the business processes of the University.

10. **RETENTION AND DISPOSAL OF UNIVERSITY RECORDS**

The University's Disposal and Retention Schedule, utilises the Business Classification Scheme to ensure that the appropriate records are captured into the record keeping system and retained for as long as those records have value. Temporary value records, those which have a limited active phase, will be destroyed at the conclusion of that phase in accordance with Disposal Authorities issued by the Queensland State Archives. Records of enduring or archival value, deemed to have
administrative, legal, fiscal, research or historic value, will be retained for a longer term, or permanently in accordance with the relevant disposal and retention authorities.

CRDS is responsible for consulting with Queensland State Archives to assess the value of the records held by the University and for setting appropriate retention periods for those records.

11. ARCHIVES

Archives provide a record of the corporate memory of the University. Archives are inactive records that are deemed to have continuing value, either permanently or temporarily. A record may be considered permanent because of its evidential, fiscal, administrative, legal, informational or historic value.

CRDS manages the Griffith University Archives and is responsible for:
- the timely destruction of records able to be destroyed under the General Retention and Disposal Schedule for Queensland Universities
- and the General Retention and Disposal Schedule for Administrative Records;
- identification and preservation of those records that must be retained permanently or for a specified period.

12. RECORDS STORAGE

The University is responsible for ensuring that records are adequately stored to prevent physical damage and minimise the physical deterioration of the records.

Records are stored in various locations both onsite and off-site depending on the level of access required for particular records.

13. DISASTER MANAGEMENT AND CONTINGENCY PLANNING

The University has a Disaster Preparedness Plan for protecting and recovering its records in the event of a disaster. The plan ensures that vital records receive the highest salvage priority and business operations are re-established as soon as possible.

14. RECORD TYPES

There are four types of University records:
- Active
- Confidential
- Vital
- Archival/Inactive

Active records are referred to frequently or are relevant to current matters. Active records are held on the shelves at the Nathan campus.

Confidential records contain sensitive and/or personal information. Access to these records is restricted to certain University employees for specified purposes.

Vital records are those records that are necessary for the continued operation of the University. They are the core set of records containing the information required to re-establish the operations of the organisation. They protect the assets and interests of the University, and its clients. Vital records are identified as such when they are classified, placed in a secure environment, a copy placed on file, and the location of the original recorded.
Examples of vital records include: key legal agreements, contracts, memoranda of understanding, financial, and minutes of Boards and University Councils. Vital records tend to be unique (that is, they cannot be acquired from external sources) and relate to specific functions of the University. Archival records are those that are no longer in active use and which have been selected for permanent preservation on the basis of their historical, legal, administrative, and financial value.

15. **FILE TYPES**

The University uses three file types:

- general
- staff
- student.

General Files include administrative and policy records that are created, received or maintained by employees of the University and its affiliated organisations in carrying out its functions, processes, activities and transactions. They include:

- Acts
- agendas and minutes of meetings of formally established University committees and boards
- decisions taken by employees under delegation which are recorded in memoranda, letters, email messages, reports, etc.
- ethical clearance
- financial transactions
- intellectual property
- policy and procedures
- program information
- records of outsourcing
- research grants.

Staff Files include records that are used for human resource management purposes, including the evidence and supporting documentation regarding the employment status of staff and the terms and conditions of employment and activities that occur whilst the staff member remains employed by the University, are captured and maintained as Staff Files.

Student Files include records of a students' interaction with the University from enrolment through to graduation. Prior to January 2000, paper-based undergraduate student records were held on student files. Since January 2000 all paper-based correspondence has been scanned. Prior to January 2002, paper-based postgraduate student records were held on student files. Since January 2002 all paper-based correspondence has been scanned.

16. **AUDIT AND REVIEW**

The University's recordkeeping management practices, systems and procedures are audited and reviewed regularly to ensure compliance with cultural, business, legislative and accountability requirements.