Records Management Policy

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<th>Approving authority</th>
<th>Chief Digital Officer</th>
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<td>Approval date</td>
<td>1 November 2018</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**

*Legislation*
- Public Records Act 2002
- Information Privacy Act 2009
- Right to Information Act 2009
- Electronic Transactions (Qld) Act 2001
- Evidence Act 1977
- Financial Accountability Act 2009

*Standards*
- AS ISO 15489 Australian Standard Records Management Parts 1 and 2, Standards Australia, 2002
- Financial and Performance Management Standard 2009
- Information Standard 18: Information Security (IS18)
- Information Standard 34: Metadata (IS34)

*Schedules*
- General Retention and Disposal Schedule for Administrative Records
- University Sector Retention and Disposal Schedule

*Other*
- Records Governance Policy (External)
- Business Classification Scheme
- Destruction of Digitised Records Policy
- Disaster Recovery Plan for University Records
- Disposal Authorisation Form
- Griffith Archive
- Griffith Archive Collection Policy
- The Responsible Conduct of Research Policy
- Information Security Policy
- Staff Confidentiality Agreement
- Vital Records Policy

[Introduction] [What is a University Record?] [Roles & Responsibilities] [Access & Security] [Records Management Systems] [Business Classification Scheme] [Retention & Disposal of University Records] [University Archives] [Disaster Management & Contingency Planning]
1. **INTRODUCTION**

   1.1 **Purpose**
   
   The purpose of the Records Management Policy is to provide a framework which ensures that full and accurate records of all activities and decisions of the University are created, managed and retained or disposed of appropriately, and in accordance with relevant legislation. This will enable Griffith University to ensure evidence of its business activities are available and accessible for as long as required for operational, accountability and compliance purposes.

   1.2 **Scope**
   
   This Policy applies to all University staff.

   1.3 **Definitions**
   
   **Recordkeeping** - the act of making and keeping evidence and memory of University business in the form of recorded information.

   **Records Management** – the field of management responsible for the efficient and systematic control of the creation, receipt, maintenance, use and disposal of records, including processes for capturing and maintaining evidence of and information about business activities and transactions in the form of records.

2. **WHAT IS A UNIVERSITY RECORD?**

   A University record is any form of recorded data or information, paper or digital, both received and created, that provides evidence of the decisions and actions of the University while undertaking its business. 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 are 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.

   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 an approved recordkeeping system.

   A document or an e-mail in a physical or digital 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 their 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.

   Records Services has procedures for managing the day to day operations of recordkeeping in the University.

   2.1 **Vital records**

   Vital Records are records that are essential for the ongoing business of the University, without which the University could not continue to function effectively or protect its interests. These include, but are not limited to, contracts, deeds, memoranda of understanding, licences, evidence of ownership of physical and intellectual property, and other records documenting the legal authority or rights of the
University. The Vital Records Policy provides further information on the identification, registration, storage and disposal of Vital Records.

2.2 Technology-dependant records
Technology-dependent records, including digital 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 to be maintained 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.

3. ROLES AND RESPONSIBILITIES

- Griffith University and all its employees is required to comply with the provisions of the Public Records Act 2002.
- The Vice Chancellor, as Chief Executive Officer, is responsible for ensuring that the University complies with the cultural, business, legislative and accountability requirements.
- The staff of Records Services, under the direction of the Manager, Information Management, have primary responsibility for the implementation of the legislative requirements and of AS ISO15489 Australian Standard: Records Management for recordkeeping and archiving within the University. They are also responsible for training users on records management and records systems operations as they affect individual practice.
- All University staff are personally accountable for the correct management of data, information and University records generated in the course of their duties or under their direct control.
- Academic and administrative elements within the University are responsible for ensuring that they have implemented the requirements of the Records Management Policy across their business units, comply with Griffith University recordkeeping procedures, and ensure sustainability of their records management systems. Individual elements are responsible for managing their records from creation to local destruction or archiving activities.
- Where possible, recordkeeping requirements should be considered and embedded within University procedures by the responsible officer.

4. ACCESS AND SECURITY

As Griffith transitions to digital recordkeeping, it is important to attain a balance between allowing people access to information necessary to undertake their jobs and maintaining proper security over records which contain classified or commercially sensitive information.

All University records should be protected from unauthorised access, disclosure, modification, loss or damage. 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. Staff handling sensitive classified information will be asked to acknowledge their responsibilities by signing a confidentiality agreement at the commencement of their employment.

4.1 Privacy Principles

In accordance with the Information Privacy Act 2009, The University seeks to ensure the security of personal information, to protect it against loss, unauthorised access, use, modification or disclosure, and against any other misuse.

4.2 Right to Information

Under the Right to Information Act 2009, 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 or student or former student are accessible to the person concerned. 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.

5. RECORDS MANAGEMENT SYSTEMS

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

Records management systems should:

- Contain appropriate metadata as defined in the Information Standard 34: Metadata (IS34);
- Routinely capture all relevant records within the scope of Griffith’s business activities;
- Organise the records in a way to reflect the business processes of the record's creator;
- Protect the records from unauthorised alteration or disposition;
- Function as the primary source of information about actions that are documented in the records;
- Provide ready access to all relevant records and related metadata; and
- Be secure and appropriately managed and protected in line with Griffith’s Information Security Policy to prevent unauthorised access, destruction, alteration or removal of records.

5.1 Enterprise Information Systems

Enterprise Information Systems (EISs) within the University can be deemed to be records management systems when they meet the above requirements. When new EISs are introduced they should be added to the master list of Enterprise Information Systems. Staff should be aware when creating new repositories, that they may contain records and therefore should have automatic recordkeeping embedded in them, where practicable. Migration to new systems must be clearly managed and documented.

6. 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 Information Management to ensure that it is relevant to the business processes of the University.

7. RETENTION AND DISPOSAL OF UNIVERSITY RECORDS

The University is legally obliged to retain all records for the minimum retention period specified in Retention and Disposal Schedules issued by Queensland State Archives. Except where a record is deemed to be ephemeral, no official records are to be destroyed without the authorisation of the Manager, Information Management. Completion of a Disposal Authorisation Form is required before records can be destroyed. Records documenting destruction activities must be retained on an official file. Destruction of all records, whether official or unofficial, must be undertaken in a secure manner.

The Manager, Information Management is responsible for liaison with Queensland State Archives when reviewing the University Sector Retention and Disposal Schedule.
8. UNIVERSITY ARCHIVES

The Griffith University Corporate Archive has been established to coordinate the identification and appropriate retention of historical University archives and memorabilia. Archives provide a record of the corporate memory of the University. Archives are usually 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.

9. DISASTER MANAGEMENT AND CONTINGENCY PLANNING

Risk prevention, response and recovery strategies for protecting and recovering University records in the event of a disaster are implemented across the University through a Disaster Recovery Plan for University Records. The plan ensures that vital records receive the highest salvage priority.