UC Policy Library

Records Management Policy

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Approval Authority	Vice-Chancellor
Contact Officer	Information and Records Manager – Office of the General Counsel | Registrar

Introduction

The purpose of this policy is to provide a framework and to assign responsibilities for ensuring that full and accurate records of the business activities of the University of Canterbury are created, maintained and disposed of in accordance with best practice. The University is committed to establishing and maintaining recordkeeping practices that meet its business needs, statutory requirements and stakeholder expectations.

Definitions

Archives

– The documents created or received and retained by a person or organisation in the course of the conduct of affairs and preserved because of their continuing (or permanent) value or significance.

– The building or part of a building where archival materials are located. The agency or programme responsible for selecting, acquiring, preserving and making available archival materials.

Disposal Authority

– A formal instrument that defines *the retention periods* and consequent disposal actions authorised for classes of *records* which are described in it (AS 4390-1996, Part 1, 4.10).

– A formal authorisation issued by the Chief Archivist under section *20* of the *Public Records Act 2005 (New Zealand Legislation website)*.

Disposal/Disposition – range of processes associated with implementing records retention, destruction or transfer decisions which are documented in disposition authorities or other instruments.

Line of Business System – a system that gathers, condenses, and filters data until they become information, then makes that information available on time and in a useful form for supporting decision-making at various levels of management within an organisation. Current examples include JadeSMS, PeopleSoft and Oracle.

Record

– "[I]nformation created, received, and maintained as evidence and information by an organisation or person, in pursuance of legal obligations or in the transaction of business." (ISO 15-489-1:2001(E) 3.15).

– Information, whether in its original form or otherwise, including (without limitation) a document, a signature, a seal, text, images, sound, speech, or data compiled, recorded, or stored, as the case may be,

    a) in written form on any material; or

    b) on film, negative, tape, or other medium so as to be capable of being reproduced; or

    c) by means of any recording device or process, computer, or other electronic device or process (*Public Records Act 2005 (Wew Zealand Legislation website)*).

– Includes a **public record** which is "a record or a class of records, in any form, in whole or in part, created or received (whether before or after the commencement of this Act) by a public office in the conduct of its affairs" (*Public Records Act 2005 (New Zealand Legislation website)*.

Recordkeeping

– "The creation and maintenance of complete accurate and reliable evidence of business transactions in the form of recorded information." (AS 4390-1996, Part 1, 4.19)

– Includes

    a) the creation of records in the course of business activity and the means to ensure the creation of adequate records;

    b) the design, establishment and operation of recordkeeping systems, including the definition of metadata; and

    c) the management of records used in business (traditionally regarded as the domain of records management) and as archives (traditionally regarded as the domain of archives administration).

Records Management – field of management responsible for the efficient and systematic control of the creation, receipt, maintenance, use and disposition of records; including processes for capturing and maintaining evidence of and information about business activities and transactions in the form of records (ISO 15-489-1:2001(E) 3.16).

Retention and Disposal Schedule – a systematic listing of records created by an organisation or agency which plans the life of these records from the time of their creation

to their disposal. A schedule is a continuing authority for implementing decisions on the value of records specified in the schedule.

Software as a Service (SaaS) – this type of Cloud service provides access to cloud based software designed for a specific purpose or function. The Cloud provider manages all aspects of the provision of service, including running the application, storing the data and rendering it available. Examples include Dropbox, Google Apps, Trello, Microsoft Office365

Policy Statement

1.   Scope

This is a University-wide policy. It applies equally to

- All staff at the University, including full and part time permanent, temporary and contracting staff.

- All business functions and activities of the University, including those performed by outside contractors.

- All records, regardless of format or media, created, received and managed by the University in the conduct of its business by staff and affiliated organisations or businesses. Note: emails are a form of electronic record.

- All metadata associated with electronic information, including data held in line of business and content management systems, except the metadata excluded from the scope of the *Public Records Act 2005 (New Zealand Legislation website)*.

1.2   Exclusions

Section 4 of the *Public Records Act 2005 (New Zealand Legislation website)* specifically excludes "records created by the academic staff or students of a tertiary education institution, unless the records have become part of the records of that institution", and as such, teaching and research records fall outside the scope of this policy.

For the avoidance of doubt, content created by students in the course of their studies or for their own personal use but stored in repositories provided for this purpose by the University, such as file shares and M365 workloads, is not covered by this policy. Such content is also explicitly excluded from the scope of the University's PCI/DSS obligations, as well as the University's obligations under the *Public Records Act 2005 (New Zealand Legislation Website).*

2.   Legislation and Standards

The University is required to manage information within a legislative framework. The legislation guiding this policy is primarily the *Public Records Act 2005 (New Zealand Legislation website)*. Under this Act, Archives New Zealand may release mandatory or discretionary standards on any aspect of recordkeeping. At present, these standards include

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- The Digitisation Standard (available through *Archives New Zealand website)*.

- The Recordkeeping Standard (available through *Archives New Zealand website*).

In addition, other legislation imposes obligations on the University in terms of managing its information assets and making them available, including the following Acts:

- *Copyright Act 1994 (New Zealand Legislation website)*.

- *Contract and Commercial Law Act 2017 (New Zealand Legislation website)*.

- *Official Information Act 1982 (New Zealand Legislation website)*.

- *Privacy Act 2020 (New Zealand Legislation website).*

Relevant financial legislation also imposes recordkeeping requirements, in particular:

- *Goods and Services Tax Act 1985 (New Zealand Legislation website)*.

- *Tax Administration Act 1994 (New Zealand Legislation website)*.

3. Statements

3.1. The University will Create and Maintain Records to Support Good Business Practice, both now and into the Future

The creation and management of accurate and reliable records enables the University to function efficiently and effectively. Creating and maintaining records protects the University's rights and entitlements and those of its staff and students. The University is accountable for its business decisions and transactions and must be able to provide evidence of its business conduct to meet internal and external stakeholder expectations. Management of records includes the routine, regular and authorised disposal of records. Records must remain usable until such time as they may legally be disposed.

3.2. Comprehensive Records Management will Support Risk Management at the University

Good recordkeeping practice mitigates risk by reducing the likelihood that the University is compromised by inappropriate or inadvertent release of information. Risk is mitigated when the University is able to provide internal and external stakeholders access to content in a timely manner, as appropriate and/or as legally required. Management, control and access to records are necessary to ensure effective decision-making that maintains and protects the University's rights and entitlements.

3.3. Information Values Model

The University has developed a three level information ranking model to enable the ready identification of the relative values of the content it creates and maintains, and to provide a clear management structure for it. The model is informed by the Disposal Criteria listed in

the *Universities New Zealand Appraisal Report* (available through the *Archives New Zealand website)*. The model must be used:

- to structure the University's SharePoint information architecture;

- to guide the use of Microsoft 365 Pro Plus; and

- to inform decision making around use of Software as a Service (SaaS).
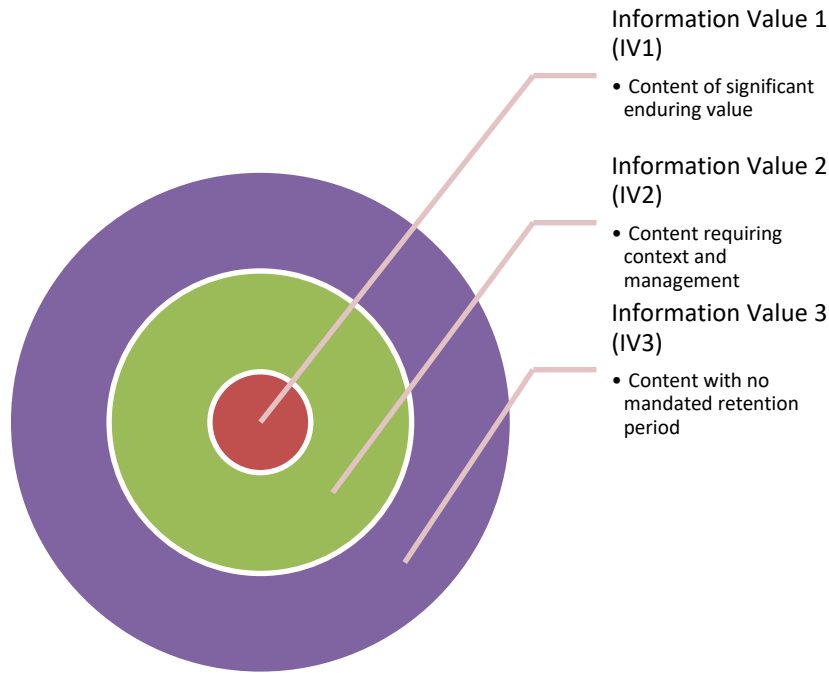
The model is represented as per Figure 1:

Information Value 1 (IV1)
- Content of significant enduring value

Information Value 2 (IV2)
- Content requiring context and management

Information Value 3 (IV3)
- Content with no mandated retention period

Figure 1 Relative Record Values

The three policy statements at the core of the model are:

Information Level	Policy Statement	Description	Disposal Outcomes
IV1	Business content of enduring or significant value requiring specific dedicated management interventions until disposal (either deletion or archiving)	Information Level 1 content has significant value to the University and documents key functions, outputs and services which have been appraised as having long term values (20+ years). This retention period, and the context required to interpret the record over time, means the record requires active management and intellectual control by the University.	Destroy, Retain or Archive as per RO5-RO8

IV2	Business content of value requiring context and management until destruction	Information Level 2 content requires managing as records, which include proper contextualisation, active management and managed disposal. Level 2 content has a medium term retention period of between 7-10 years and needs to remain accessible and usable over that period.	Destroy as per RO3-RO4
IV3	Business content with no mandated retention period	Information Level 3 content is information which is typically individual, team or group related and which does not require retention, management or contextualisation beyond its initial creation and use. It may be deleted at any time. Academic content excluded from the *Public Records Act 2005* also falls into this category.	Destroy as per RO1-RO2

3.4.   Records Retention and Disposal

The University's records must be retained for the minimum retention period outlined in the *[General Disposal Authority for New Zealand Universities DA337 (University of Canterbury website)](#)* prior to their disposal. The table below outlines the minimum retention periods against the Relative Record Value Model. This table must be referred to when considering the implementation of new or substantially revised systems intended to create or maintain the University's content. It represents the Base Content Types available in SharePoint 2013, which must be used for the creation of dedicated site collection or site content types developed by users.

Information Level	Title	Retention Period
IV3	Record Outcome One	until no longer required then destroy
IV3	Record Outcome Two	2 years destroy
IV2	Record Outcome Three	7 years destroy
IV2	Record Outcome Four	10 years destroy (mid value)
IV1	Record Outcome Five	10 years destroy (high value)
IV1	Record Outcome Six	20 years destroy
IV1	Record Outcome Seven	Retain permanently; to be appraised
IV1	Record Outcome Eight	10 years archive; 20 years archive; until no longer required archive

The actual disposal of content must be undertaken by following procedures established by the University's Information and Records Manager. Content must be sentenced against the *General Disposal Authority for New Zealand Universities DA337 (University of Canterbury website)*.

3.5. Ownership

The ultimate ownership of University records rests with the Crown. Content appraised as being of archival value will ultimately be transferred under s *20(1)(b)* of the *Public Records Act 2005 (New Zealand Legislation website)* to Archives New Zealand. Information and records created in the course of the University's business are owned by the University. All records created by a contractor during the course of a contract belong to the University and should be managed in the formal University information and records systems or prepared in such a way as to enable the transfer of them into formal information and records systems at the end of the contract[1].

The Vice-Chancellor, or his/her nominee, oversees the administration of records in the University through the execution of the University's Records Management Programme and he/she makes rulings about the retention or disposal of University records under the provisions of the *Public Records Act 2005 (New Zealand Legislation website)*. General oversight of the University's records is vested with the Information and Records Manager who will establish general records procedures and disposition schedules as required.

3.6. Access

The University's information is an institutional asset. To get the best value from its investment, continued and controlled access to records is necessary. The University's content, therefore, must be an accessible and usable resource:

- for as long as it is required to be retained;
- to as large a community as possible; and
- that is centrally discoverable for the purposes of legal or legislative investigation.

In addition

- access to sensitive information must be controlled using transparent permissions management;
- access to personal and sensitive personal information must be managed under the provisions of the *Privacy Policy (PDF, 823KB)*; and
- access to records must not be limited to a single user or via a single login/password.

The University is bound by the *Official Information Act 1982 (New Zealand Legislation website)*, and has an obligation to disclose information upon request. However, in granting

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[1] Unless otherwise agreed in the formal contract.

access to records, the University will recognise its obligations to protect the privacy of students, staff and clients of the University in accordance with the *Privacy Act 2020 (New Zealand Legislation website).* Access to records relating to the privacy of the individual (matters covered by Section 9 of the *Official Information Act 1982 (New Zealand Legislation website)*) is governed by security levels and procedures approved by the Vice-Chancellor.

3.7. Records Systems

The *Public Records Act 2005 (New Zealand Legislation website)* and this policy are 'system agnostic' – they do not distinguish between records created in one system or another. The University uses a variety of services that create and maintain records, and this policy applies to the content created across them all, including:

- **SharePoint** – the University is developing SharePoint 2013 as its enterprise information and records management system. From 2016, SharePoint must be selected as the service for managing University content, unless there is a compelling business case not to, determined via the PMO's IRF process. Regardless, this policy still applies to content created and maintained in non-SharePoint systems.

- **Microsoft Office 365 Pro Plus** – under the University's licence agreement with Microsoft, staff may in the future have access to Office 365 Pro Plus, a service which includes the Office suite integrated with extensive Cloud storage. This service will be hosted in the University's tenancy in the Microsoft cloud. It is provided as a staff benefit for working at the University, and does not present a formal University records or content management service. IV1 and IV2 level records must not be stored or managed in Office 365 Pro Plus (also known as OneDrive).

- **Microsoft Outlook (email)** – all University staff are provided with an email account and email storage via the Microsoft Exchange server. Email is a record like any other and requires management as per this policy. Care must be taken when deleting email that deletion is approved (ie, is 'IV3') and that email of value is integrated into recordkeeping systems such as SharePoint or file shares, or retained in Outlook accounts until its disposal can be managed.

- **Learn** – the learning management system is designed to manage teaching content and class information. Although it is capable of storing other forms of content, it is not designed to manage this content as institutional records and must not be used for this purpose.

- **Personal Cloud Storage services** – the use of personal (or private) cloud storage services for the creation and maintenance of corporate IV1 and IV2 content is prohibited under this policy because these services are removed from UC control, are not subject to UC's search and discovery systems, and do not provide adequate recordkeeping attributes. Their use is a breach of the *Public Records Act 2005 (New Zealand Legislation website):*

- o Personal cloud services may be used to support the functions of mobile device apps and other productivity tools, where the content being created and managed is IV3 (low level, diary management, draft notes etc.,) and which can be deleted when no longer required.

  Note:This content remains subject to the [Official Information Act 1982 (New Zealand Legislation website)](#) and the [Privacy Act 2020 (New Zealand Legislation website)](#).

- o This prohibition does not apply to academic staff's teaching and research content, which is excluded from this Policy's scope.

  Examples of types of personal Cloud services include Google Docs, Drop Box and personal OneDrive accounts.

4. Records Responsibilities

4.1. Vice-Chancellor

The Vice-Chancellor is responsible for

- the University's compliance with the [Public Records Act 2005 (New Zealand Legislation website)](#);

- authorising the University's Records Management Policy;

- ensuring the development and implementation of a records management programme;

- assigning responsibilities for information and records management; and

- ensuring that policy and procedures exist to prevent unauthorised disposal of records.

These responsibilities have been delegated to the University Registrar.

4.2. Managers

All managers have the responsibility of ensuring that their staff are aware of, and follow, the Records Management Policy and associated procedures. This means

- Identifying staff requiring records management training (including contractors and fixed-term employees);

- Raising records management issues with the Information and Records Manager;

- Modelling good practice in records management and supporting and fostering a culture in their area of management that promotes good recordkeeping practices;

- Ensuring appropriate resources (time and people) are allocated to records management.

4.3.   Information and Records Manager

The Information and Records Manager is responsible for

- the maintenance and administration of the **Records Management Policy** and procedures;

- the information architecture of the University's SharePoint environment;

- developing and maintaining an Information and Records Management Programme;

- promoting information and records management policies and procedures to all staff;

- monitoring compliance;

- delivering records management training; and

- implementing the *General Disposal Authority for New Zealand Universities DA337 (Information and Records Management   website)* so as to ensure that records are kept for only as long as they are required and that records of permanent value are protected from unauthorised destruction.

4.4.   Information and Technology Services Staff

UCIT Services (University UCIT Services website) staff are responsible for maintaining the technology used to support systems that capture and keep records electronically, ensuring that all documents are reliable, available and accessible when required and that appropriate security is maintained.

4.5.   All Staff

All University staff must

- Understand and comply with the University's documented information and records management policies and procedures;

- Create full and accurate records of activities, transactions and decisions carried out in the course of daily business activity and store these records in approved University recordkeeping repositories;

- Ensure that access to and distribution of documents is appropriate for the nature of the documents; and

- Ensure that no records are destroyed or removed unless permitted by a current disposal authority.

4.6.   Contractors and Consultants

All contractors and consultants must adhere to the University's documented records management policies and procedures, as if they were permanent staff. Information and records management requirements should be written into contracts where applicable.

Related Documents and Information

Legislation

- [Copyright Act 1994 (New Zealand Legislation website)](#)

- [Contract and Commercial Law Act 2017 (New Zealand Legislation website)](#)

- [Goods and Services Tax Act 1985 (New Zealand Legislation website)](#)

- [Official Information Act 1982 (New Zealand Legislation website)](#)

- [Privacy Act 2020 (New Zealand Legislation website)](#)

- [Public Records Act 2005 (New Zealand Legislation website)](#)

- [Tax Administration Act 1994 (New Zealand Legislation website)](#)

UC Policy Library

- [Cloud Policy (PDF, 313KB)](#)

- [Data Management Policy (PDF, 158KB)](#)

- [Privacy Policy (PDF, 823KB)](#)

UC Website and Intranet

- [General Disposal Authority for New Zealand Universities DA337 (University Information and Records Management website)](#)

- [UCIT Services (University UCIT Services website)](#)

External

- [Archives NZ (Archives NZ website)](#)

Document History and Version Control Table			
Version	**Action**	**Approval Authority**	**Action Date**
For document history and versioning prior to 2013 contact ucpolicy@canterbury.ac.nz			
1.00	Conversion onto new template and updated hyperlinks.	Policy Unit	Sep 2013
1.01	Document review date pushed out.	Policy Unit	Feb 2014
1.02	Review date pushed out.	Policy Unit	Sep 2014
2.00	Scheduled review by Contact Officer.	Policy Unit	Oct 2015
2.01	Major changes approved by Approval Authority.	Policy Unit	Nov 2015
3.00	Minor changes to content, policy rolled over for 12 months	Policy Unit	Nov 2019
3.01	Unscheduled review by contact officer, minor changes to clause 1.2.	Policy Unit	Feb 2021
3.02	Review date pushed out for 6 mths	Policy Unit	May 2021

This policy remains in force until it is updated.