Information, Records and Data Policy

**Nōnahea i Whakarerekē	Last Modified**	June 2023
**Rā Arotake	Review Date**	June 2027
**Mana Whakaae	Approval Authority**	General Counsel and Registrar
**Āpiha Whakapā	Contact Officer**	Information Manager

Kupu Whakataki | Introduction

The University of Canterbury recognises that its Information, Records and Data are valuable organisational assets which are fundamental to the functioning of the University.

The purpose of this Policy is to ensure the University's Information, Records and Data are appropriately created, managed, stored, accessed, transferred and disposed of. This enables the University to ensure that the security, confidentiality, integrity and availability of Information, Records and Data are maintained appropriately in order to enable legislative compliance, contractual obligations and support the University's efficient operations.

Managing Information, Records and Data enables the University to be accountable for its decisions, actions and transactions to and with students, staff, stakeholders, funders and the Government. Information, Records and Data also support the University's strategic goals and form the documentary history of the University.

Scope

This Policy applies equally to all Staff, and covers all Information, Records and Data regardless of format or media, which are created, received, and managed by the University in the conduct of its business by Staff.

The Policy does not apply to Information, Records and Data in which the intellectual property is owned by a member of University staff, student or other third party. See the _Intellectual Property Policy (PDF, 157KB)_ for information on intellectual property ownership.

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".[1] In line with this:

- Records created by academic staff for the purposes of teaching and research fall outside the scope of this Policy.
- Content created by Students during their studies or for their own personal use are not covered by this Policy.

For further information please refer to the *Guideline document (University Intranet – Staff Only)* 'When academic and student work become records'.

Principles

- The University will protect and respect Information, Records and Data which Staff create or are entrusted with.

- How the University collects, manages, accesses, and uses Māori Information, Records and Data will demonstrate a commitment to partnership and cultural competence, informed by Māori data guidelines.

- Information, Records and Data will only be collected for specific documented purpose and use, in-line with New Zealand legislative requirements and any business requirements *(University Intranet - Records Creation and Disposal – Staff Only)*.

- The privacy and confidentiality of individuals and commercial interests will be protected.

Kaupapa Here | Policy Statements

1. General
- The University will create, manage and dispose of Information, Records and Data in accordance with our legal and contractual obligations and in line with the relevant procedures, guidelines and standards *(University Intranet - Information and Records Management – Staff Only)*.

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[1] Refer to the Guideline document 'When academic and student work become records'

- University Information, Records and Data covered by this Policy are the property of the University, and not of the individual staff members, faculties or service units who create or receive them.

- Information, Records and Data must be stored in University approved repositories and systems.

- Information, Records and Data must not be created and maintained in any personal/private email accounts or cloud storage services e.g. Dropbox, Google Docs, iCloud.

- Information, Records and Data must be kept secure and protected from corruption, damage, unauthorised access, use, modification or disclosure.

- Information, Records and Data will be classified according to the University's taxonomy *(UC Intranet - Taxonomy – Staff Only)*.

- Information, Records and Data will be managed through their life-cycles including long-term preservation and access, and catering for technological obsolescence.

- Information, Records and Data will be managed in line with the Retention and Disposal Schedules prescribed by Archives NZ (GDAs 6 & 7) and the Universities NZ Disposal Schedule (DA702) *(UC Intranet - Records Creation and Disposal – Staff Only).*

- Records disposal must be performed systematically and securely, following the University's disposal procedures *(UC Intranet - Records Creation and Disposal – Staff Only).* Information, Records and Data must not be disposed of without the appropriate authorisation.

- The University will provide training and support for staff members to ensure compliance with this Policy.

- Staff Members will complete all relevant training to enable adherence with this Policy and will only access information they have a genuine need for (taking into consideration their role requirements, this Policy and all legal obligations).

- Where the University's processes are changed, or new processes established, due consideration must be given to the University's evidential and information requirements.

- Information, Records and Data management risks will be taken into consideration for all IT-enabled projects and services.

2. Data

- Data sources must have a defined owner (Data Owner) who has overall responsibility for the accuracy, integrity, and access controls of the data.

- Data Stewards *(UC Intranet - Data Governance – Staff Only)* will be identified for the University's key data sets. They will approve definitions for data under their stewardship and will actively work to identify and advocate for the resolution of data quality issues/errors.

- Data should be defined consistently *(UC Intranet - Data and Analytics FAQs – Staff Only)* across the University (as defined by the Data Steward).

- Data capture, validation, and processing should be automated wherever practical.

- Data should be auditable and traceable over time.

- Whenever possible, international, national, or industry standards for common data standards should be adopted.

3.   Access

The University's Information, Records and Data must be an accessible and usable resource:

- for as long as it is required to be retained in accordance with legal and contractual obligations and in line with the relevant procedures, guidelines and standards;
- to as large a community as possible (subject to privacy requirements); and
- that is centrally discoverable for the purposes of legal obligations (including legislative investigation).

Access to, use of and sharing of Information, Records and Data must be managed appropriately in line with legal and business requirements and any policies, procedures and processes which are developed.

Access to systems which hold Information, Records and Data should be regularly reviewed and audited to ensure that access is appropriate and up to date.

Access to information by members of the public and external organisations is governed by specific legislation, namely the *Official Information Act 1982 (New Zealand Legislation website)* and the *Privacy Act 2020 (New Zealand Legislation website)* and may be subject to other legal considerations.

4.   Roles and 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).*

- Ensuring the University follows relevant policy, standards and guidelines made by the Chief Archivist for making and keeping full and accurate records of its activities.
- Ensuring that relevant strategies and policies for Information, Records Management and data are developed, maintained and communicated.

These responsibilities have been delegated to the General Counsel/Registrar as Executive Sponsor at the University.

4.2   Information and Data Governance Steering Committee (IDGSC)

Governance oversight is provided through the Information and Data Governance Steering Committee.

The Committee is responsible for:

- Endorsing relevant data and information management plans.

- Resolving escalated data and information issues from Data Stewards or the Data Governance Working Group.

- Monitoring the privacy implications of data and information management activities brought to it.

- Promoting the benefits of information and data governance to create awareness, understanding, and financial support.

- Supporting information and data driven decision making.

4.3 Senior Management

The Senior Leadership team members are responsible for managing information and records. They must provide direction and support to meet business requirements and relevant laws and regulations regarding Information and Records Management.

4.4 Managers and Data Owners

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

- Identifying staff requiring information, records or data management training (including contractors and fixed-term employees).

- Raising information and records management issues with the Information Management, Manager or to the IDGSC.

- Support Data Stewards in the resolution of data quality issues.

- Modelling good practice in information, records and data management and supporting and fostering a culture in their area of management that promotes good practices.

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

- Ensure information in their area are stored appropriately, protecting confidentiality and privacy where necessary. This will include regular review of who access to information under their management.

- Information, records and data management requirements should be written into contracts where a third party may have access to University information, records and/or data.

4.5 Information Management, Manager

The Information Management, Manager is responsible for:

- Maintenance of the Information, Records and Data Management Policy.

- Developing, publishing, promoting and maintaining information and record keeping procedures, processes, frameworks and strategies.

- Providing policy advice and strategic guidance to all staff with regards to information and record management practices and systems.

- Managing all physical records that have been transferred to their care until they are transferred to Archives NZ or destroyed.

- Monitoring compliance through available tools and internal audits of recordkeeping processes across the University.

- Implementing the *Disposal Schedule Authority for New Zealand Universities DA702 (UC intranet – Staff Only)*, GDA 6 and GDA 7, so as to ensure that records are kept for as long as they are required and that records of permanent value are protected from unauthorised destruction.

4.6 Head of Data and Analytics

UC's Head of Data and Analytics is responsible for:

- Ensuring that the University has fit for purpose tools, technology and processes for effective data integration and data analytics.

- Implementing and maintaining data analytics and data integration access controls that are consistent with those agreed with Data Owners, University policy and the University's Informational Manager.

- Ensuring that expansion/enhancement efforts of the University's analytics datastores (data warehouse/data lake) mirror the University's strategic goals.

- Ensuring the University's key master data, data sets are consistently and appropriately synchronised across the University's systems.

- Supporting data stewards from across the University to address data quality issues for data sets they steward.

- Supporting data stewards from across the University to update the University's Data Catalogue with data definitions, sensitivity classification etc.

- Supporting analysts from across the University to access and understand data.

- Flagging any analysis requests that may have ethical considerations with the University's Information Manager.

4.7 All Staff

- All University staff must complete information, records and data training as required.

- Promote data quality and data protection practices for all data sets they interact with.

- Understand and comply with the University's documented information, records and data 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 repositories.

- Ensure that access to and distribution of documents is appropriately approved.

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

4.8   Data Stewards

- A Data Steward is a subject matter expert who also has authority and responsibilities over the data set(s) they steward.

- They will approve definitions for data under their stewardship.

- They will actively work to identify and advocate for the resolution of errors.

4.9   Contractors and Consultants

All contractors and consultants must adhere to the University's documented records management policies and procedures, as if they were Staff. Records created by contractors and consultants belong to the University. Information and records management requirements should be written into contracts where applicable to ensure all formal information is retained by the University at the end of the contract.

4.10   Committees, Working Parties and Project Teams

Chairs/secretaries for all committees, working parties and project teams must in regard to the records of the committee, working party or project team:

- Create and keep full and accurate records
- Be responsible for the management of committee records

- Comply with relevant University standards, guidelines and policies on information and records management

4.11   Information and Records Management (IRM) team

The University has a devolved model of records management whereby organisation units have responsibility for the management of their records with the assistance of the IRM team. IRM staff will assist organisational units through the provision of advice, access to infrastructure and training in records management procedures.

Tautuhinga | Definitions

Archives – Records which are not required for current use but have permanent or continuing value relating to the history and activity of the University.

Archiving – A process of securely storing inactive information in any format (both digital and paper) that is no longer used regularly for long term retention.

Data – Facts and statistics that have not been processed and are in their rawest form. Data is processed to produce information.

Data Management – The management of data for the University.

Data Owner - A Data Owner is the UC stakeholder accountable for the data quality and governance of a data set(s). They are usually a senior leader who can make decisions about how the data is used, protected (including access provisioning rules) and maintained. The Data Stewards report to the Data Owner.

Data Steward – A Data Steward is a subject matter expert who also has authority and responsibly over the data set(s) they steward. They will approve definitions for data under their stewardship and will actively work to identify and advocate for the resolution of errors. They are involved in the operational aspects of managing their data set(s). The Data Stewards report to the Data Owner.

Destroy – The record may be destroyed by an approved method e.g. secure shredding, digital destruction.

Disposal – The final decision concerning the fate of a record. This can be destroy, archive or transfer.

Disposal Authority – A formal document that defines the retention periods and consequent disposal actions authorised for classes of records which are described in the Disposal Schedule issued by Archives New Zealand under the Public Records Act 2005.

Information – Refers to knowledge communicated or received. The result of processing, gathering, manipulating and organising data in a way that adds to the knowledge of the receiver.

Public Records – Records in any form created or received by a public office (such as UC) in the course of its business which are covered by the Public Records At 2005. The Disposal Authorities provide detailed guidance to the various public records. The term 'Public Record' does not necessarily imply public access or the placement of such records into the public arena.

Record – Refers to information created, received, and maintained as evidence and information in order to complete the business functions of the organisation. These may be in any format including (but not limited to), paper based, electronic, spreadsheets, letters, sound files, photographs etc.

Records Management – Systematic control of the full lifecycle relating to the creation, use and maintenance of complete, accurate and reliable evidence of business transactions.

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

Taxonomy – A scheme of classification e.g. an information taxonomy

University Records – Refer to public records created by the University when carrying out its activities. These records are defined under the Public Records Act 2005 and do not include academic research materials, personal teaching materials and materials created by students unless specifically designated as such.

Staff or Staff Member(s) – for the purposes of this policy, the definition of "staff" or "staff member" extends to cover all persons working at, for, or on behalf of, the University (whether paid or unpaid), including but not limited to, contractors, subcontractors and their employees, adjunct appointees, Erskine visitors, consultants, guest lecturers, interns and volunteers. It also includes members of Council.

He kōrero anō | Related Documents and Information

Whakaturetanga | Legislation

- [Public Records Act 2005 (New Zealand Legislation website)](#)
- [Privacy Act 2020 (New Zealand Legislation website)](#)
- [Official Information Act 1982 (New Zealand Legislation website)](#)

UC Policy Library

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

Te Pae Tukutuku me te Ipurangiroto o UC | UC Website and Intranet

- [Information and Records Management pages (UC Intranet – Staff Only)](#)

- [Disposal Schedule Authority for New Zealand Universities DA702 (UC intranet – Staff Only)](#)

- [Universities Disposal Schedule DA702 and General Disposal Authorities – Schedule 6 and 7 (UC Intranet – Staff Only)](#)

Mōwaho | External

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

Document History and Version Control Table			
Version	**Action**	**Approval Authority**	**Action Date**
1.00	Rescinded Records Management Policy and Data Management Policy Created Information, Records and Data Policy	General Counsel/Registrar	Jun 2023
1.01	Addition of definition of Data Owner	Policy Unit	Aug 2023

This document remains in force until it is updated.