Recordkeeping Policy

Version | Approved by | Approval date | Effective date | Next review
---|---|---|---|---
3.0 | President and Vice-Chancellor | 26 May 2021 | 26 May 2021 | May 2024

Policy Statement

| Purpose | The University’s records are its corporate memory, provide evidence of actions and decisions and represent a vital asset to support its daily functions and operations. This Policy specifies the principles, roles and responsibilities that govern recordkeeping at UNSW and provides strategic direction for the Recordkeeping Framework of the University. |
| Scope | All staff, contractors and consultants engaged in work for the University across all of its sites. |

Policy Provisions

1. Background

The University’s records protect the interests of UNSW, the rights of staff, graduates, students and citizens, help UNSW to deliver its services in consistent and equitable ways, and form the corporate memory of the organisation.

Records and information that are trustworthy, accessible, reusable, and appropriately governed support improved decision-making, collaboration, transparency and outcomes across the University.

The University is committed to compliance with the *State Records Act 1998* (NSW) and *NSW Standard on Records Management*, and to delivering better business outcomes through the best practice management of these core assets.

The UNSW Recordkeeping Framework (Section 3) describes the context of the University’s recordkeeping environment. The framework is underpinned by a set of principles (as described in Section 2) and includes a Recordkeeping Program to monitor and review recordkeeping (Appendix 1) and a series of UNSW Legislative instruments, Codes of Conduct, Policies, Standards, Procedures alongside professional regulations and standards.

2. Principles

UNSW adopts the following Recordkeeping principles:

- Information in the form of records is:
  - ready for re-use and remains accessible for as long as needed.
  - discoverable across our organisation by those with legitimate need.
  - accurate, up-to-date, and complete.
- Governance mechanisms ensure that information management practices support good decision making and promote accountability and transparency to deliver good business outcomes.
- Systems protect information from unauthorised access, alteration, deletion, or misuse.
- Records and information management is an integrated component of all processes, systems and services and ownership of records is always defined and allocated appropriately.
- People understand and appreciate the value of information as an asset for the organisation and the State of NSW, and as the intellectual property of the State and cultural heritage of our people.
3. Recordkeeping Framework

The UNSW Recordkeeping Framework is described in the following table:

![Recordkeeping Framework Diagram]

4. Governance

The President and Vice-Chancellor has a duty to ensure that the University complies with the requirements of the State Records Act 1998 (NSW) and any regulations with respect to State records for which the University is responsible.

Formal responsibility for the Recordkeeping program will be delegated to an appropriate senior manager who will perform the role of Manager, Records & Archives. The role of the Manager, Records & Archives is to:

- establish records management policies for the organisation as a whole
- establish corporate standards for recordkeeping including UNSW Recordkeeping Standards, Procedures and Guidelines
- measure performance of business units and workgroups against those standards
- provide consulting services to business units
- work with other managers of information resources to develop a coherent information architecture across the organisation, and
- work with other accountability stakeholders, including auditors, Government Information (Public Access) (GIPA) officers and executive management, to ensure that recordkeeping systems support organisational and public accountability.
5. Archival records

The State Archives and Records Authority of NSW is entitled to control records identified as State Archives and no longer in use for official purposes. The Authority takes control by taking records into its possession or custody or by entering into an agreement, understanding or other arrangement for custody of those records. The University has such an understanding with the Authority for the University’s archives.

The University Archives provide for the care, management and servicing of State archives and other State records in line with the environmental conditions specified in the NSW Standard on the Physical Storage of Records.

Other records that have been determined to have continuing administrative, fiscal, legal, evidential or historic value to the University will also be retained permanently in the University Archives.

6. Responsibilities

People

6.1. The Manager, Records & Archives is responsible for the overall management of the University’s records and information.

6.2. The Data & Information Governance Steering Committee provides oversight for initiatives designed to deliver better outcomes for information across UNSW and input on the strategic management of records.

6.3. Deans/Heads of Schools/Department managers retain responsibility for ensuring appropriate systems and processes are in place for the capture, storage and disposal of records within their areas of responsibility, and that their Unit managers are aware of their recordkeeping responsibilities.

6.4. Business owners retain responsibility for identifying the records of their Unit’s activities, the appropriate capture, storage, and disposal of these records, and for ensuring staff are aware of their recordkeeping responsibilities and how to meet them.

6.5. All staff and contractors of the University have an obligation to make and keep full and accurate records of their activities. The University provides training and resources to ensure all staff are aware of these requirements and able to access the necessary tools and systems to meet them.

6.6. System owners retain responsibility for all records and information captured to the system.

Systems and Processes

6.7. Records are never destroyed without first undergoing a process of appraisal and the approval of the relevant authority. The destruction of records, irrespective of format, must always be correctly documented.

6.8. Any system or service used for the capture of University records and information must be assessed for its ability to comply with records management standards and evidence retained of this assessment.

6.9. University records must be captured to, and managed by, a University System of Record.
### Accountabilities

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<tr>
<th>Responsible Officer</th>
<th>Deputy Vice-Chancellor Planning and Assurance</th>
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<tr>
<td>Contact Officer</td>
<td>Manager, Records &amp; Archives</td>
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### Legislative Compliance

This Policy supports the University’s compliance with the following legislation:

- State Records Act, 1998 (NSW)
- Evidence Act, 1995 (NSW)
- Government Information (Public Access) Act, 2009 (NSW)
- Health Records and Information Privacy Act, 2002 (NSW)
- Privacy and Personal Information Protection Act, 1998 (NSW)
- Children and Young Persons (Care and Protection) Act, 1998 (NSW)
- Public Finance and Audit Act, 1983 (NSW)
- University of New South Wales Act, 1989 (NSW)
- Work Health and Safety Act, 2011

### Supporting Information

- Recordkeeping Standard
- Record Appraisal Procedure
- Archives Access Guideline
- Archives Acquisition Guideline
- Record Security Guideline
- Record Titling Guideline
- AS ISO: 15489 Records Management
- AS ISO: 16175 Principles and Functional Requirements for Records in Electronic Office Environments
- NSW Standard on Records Management
- NSW Standard on the Physical Storage of State Records

### Related Documents

- Cloud Services Guidelines
- Code of Conduct
- Data Classification Standard
- Data Governance Policy
- Domestic Violence Support Procedure
- Email Policy
- Handling Research Material & Data Procedure
- IT Security Policy
- Procurement Procedure
- Report Wrongdoing Procedure
- Research Data Governance & Materials Handling Policy
- Third-Party Agreement Recordkeeping Guideline
- UNSW Guidelines for Commercial Activities

### Superseded Documents

- Recordkeeping Policy, v2.2

### File Number

- 2021/017130

### Definitions and Acronyms

**Business Owner**

An organisational role that is responsible for the business oversight of an information system.

Business owners of systems are typically senior business operational managers with responsibility for business processes and data/content that are supported by the business system.
| **System Owner** | An organisational role that is responsible for the procurement, development, integration, modification, operation, maintenance, and disposal of an information system. |
| **System of Record** | Systems that have been evaluated for their suitability for the capture and management of University records. All University records must be captured to a system of record. |
| **University record** | Any document, regardless of format, created or received by University staff in the course of their official duties and kept as evidence of the transaction of business activities. |
| **Data & Information Governance Steering Committee** | The Data & Information Governance Steering Committee is the governing body for establishing, maintaining, and promoting the values and behaviours that underpin successful Data & Information Governance at UNSW. |
| **Appraisal** | The assessment of University records to determine their retention requirements in accordance with business need and legislative requirements, including the State Records Act (NSW) 1998. |

## Revision History

<table>
<thead>
<tr>
<th>Version</th>
<th>Approved by</th>
<th>Approval date</th>
<th>Effective date</th>
<th>Sections modified</th>
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<tbody>
<tr>
<td>Version 2.0 of this policy supersedes v1.1 of the Electronic Recordkeeping Policy.</td>
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<tr>
<td>1.0</td>
<td>Vice-Chancellor</td>
<td>1 December 1998</td>
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<tr>
<td>1.1</td>
<td>Head, Governance Support</td>
<td>30 November 2009</td>
<td>1 December 2009</td>
<td>Section 4.3, 4.4, and 5</td>
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<tr>
<td>2.0</td>
<td>President and Vice-Chancellor</td>
<td>22 November 2017</td>
<td>22 November 2017</td>
<td>Full review</td>
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<tr>
<td>2.1</td>
<td>Director of Governance</td>
<td>7 February 2018</td>
<td>7 February 2018</td>
<td>Administrative update. Responsible Officer title changed from Chief Strategy Officer to Vice-President, Strategy and Quality</td>
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<td>2.2</td>
<td>Director of Governance</td>
<td>12 June 2019</td>
<td>12 June 2019</td>
<td>Administrative update. Responsible Officer title changed to Deputy Vice-Chancellor Enterprise; links to Supporting Documents</td>
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<td>President and Vice-Chancellor</td>
<td>26 May 2021</td>
<td>26 May 2021</td>
<td>Full review</td>
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Appendix 1: Recordkeeping Program

Records & Archives maintains a recordkeeping program to ensure:

1. Staff are aware of their responsibilities to create, capture and maintain records, how to achieve these responsibilities, and where to access supplementary resources.

2. A regular program of staff induction, training and other outreach activities is delivered to promote awareness and understanding of recordkeeping responsibilities.

3. Records that support high-risk and high value business activities of the University are identified, a register maintained, and records of these areas rigorously maintained.

4. Long term value records, including those requiring permanent retention as NSW State Archives, and other records of enduring value to the University (University Archives), are identified and managed appropriately including, where applicable, their transfer to the custodianship of the University’s Archives when no longer required as active business records.

5. Recordkeeping requirements are identified and addressed in the development and or purchase of all University business systems and that special consideration is given to outsourced, cloud or similar service arrangements. This also includes the management of records through system transitions and/or migrations.

6. Information management by design, including system-level automated capture of records, is promoted and implemented wherever beneficial and possible.

7. Records management activities are routinely monitored and reviewed, any shortcomings identified, and corrective action taken as appropriate.