

# Recordkeeping Policy and Procedure

**Controlled Document – refer to Intranet for latest version**

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## Purpose

The purpose of this Policy and Procedure is to provide a framework and to assign responsibilities for ensuring that full and accurate records of UCOL’s business activities are created and managed appropriately.

It aims to ensure that these records are managed and maintained, made accessible, stored and disposed of, in a manner that ensures business and legislative requirements are met.

All records pertaining to previous entities, ITPs, organisations and business of UCOL are deemed to be UCOL records.

## Scope

This is a UCOL-wide policy. It applies to:

- All staff of UCOL, including permanent and fixed term staff, UCOL Board members, and volunteers.
- All contractors including all staff of affiliated organisations of those contractors. This covers all records created and received as a result of and for the duration of their contract. All records created and received by contractors in the course of carrying out UCOL’s business are the physical and intellectual property of UCOL, not the individual contractor.
- All business functions and activities, both academic and corporate, except the following :
  - academic lecturing work created by employees and academic work created by students of UCOL, unless the work has become part of the records of UCOL (s.4 Public Records Act 2005).
- All records regardless of media, created, received and managed by UCOL in the conduct of its business by staff and affiliated organisations or businesses. This includes, but is not limited to: emails, correspondence, faxes, text messages, databases, spreadsheets, recordings, photographs, websites, social media sites, and reports.
- All records created and received regardless of the physical location of the working environment, be this on UCOL premises, at home or off site.

## Policy Statements

UCOL is committed to implementing best practice records management to ensure the appropriate creation, use, maintenance and protection of information.

### 1. Ownership

All records created or received by UCOL staff (including contractors, consultants and authorised third parties) in the course of their work for UCOL are owned by UCOL.

### 2. Creation and Format

The Recordkeeping Policy and Procedure will apply irrespective of format and storage media.

The creation, collection, use, retention and disposal of information will comply with recordkeeping legislation and regulatory requirements.

### 3. Security

Comprehensive records management will support risk management at UCOL. Good recordkeeping practice mitigates risk by reducing the likelihood that UCOL is compromised by inappropriate or inadvertent release of records. Management, control and access to records are necessary to ensure effective decision-making that maintains and protects the rights and entitlements of UCOL.

UCOL's records must be stored in approved repositories and systems.

Records disposal must be performed systematically and securely, following UCOL's disposal procedures.

### 4. Access

Access to information by members of the public and external organisations is governed by specific legislation, namely the Official Information Act 1982 and the Privacy Act 1993 (Privacy Act 2020 from 1 December 2020), and may be subject to other legal considerations.

### 5. Use of Records

Staff will responsibly manage the records they hold.

Reliable and accurate records will be created which can be trusted as an accurate representation of UCOL business activities and transactions carried out. The creation and management of accurate and reliable records enables UCOL to function efficiently and effectively.

Privacy and confidentiality of individuals and commercial interests will be protected.

### 6. Disposal

UCOL's records are valuable organisational assets, and therefore it is important that records disposal must be carried out in accordance with the retention and disposal authority as required by the Public Records Act 2005. Disposal of information must be carried out following UCOL's disposal procedures.

Records must not be disposed of without the appropriate authorisation.

### 7. Monitoring and Review

This policy and accompanying procedures will be reviewed bi-annually or whenever a significant change or event necessitates review.

Staff compliance with the policy and accompanying procedures will be monitored through staff self-assessment, and by managers with responsibilities for staff.

## Records Management Procedure

### 1. Creation of Records

Full and accurate records must be created and maintained by all UCOL departments to support the administrative, fiscal, legal and business requirements necessary to document a transaction. Records must be:

- In an accessible form for future reference;
- Adequate for the purposes for which they are kept;
- Authentic and provide evidence of activity, including content, context and structure; and
- Legible, readily identifiable and retrievable.

All records will be identified and captured into UCOL's recordkeeping systems and appropriately organised and described.

Where information is obtained in a media that makes it difficult to retain, the content of the information must be created in another storage media to enable easy retrieval. For example, with a text message or phone conversation in which decisions are made, a file note or other form of information capture is required.

### 2. Management of Physical Records

#### *Archiving of Records*

Records that are inactive but have not yet reached their retention period to be destroyed can be archived offsite at UCOL's external records archiving facility (CROWN). (Refer to UCOL's General Disposal Authority for the retention period of records.)

- To ensure inactive records are kept secure, and are easily recoverable, a CROWN Archiving Register Template will be completed. Archiving cartons and barcodes are provided by the Corporate Assurance & Risk Team. Once the records are prepared for archiving, the Corporate Assurance & Risk Team will arrange for the archived record to be logged in CROWN's system, along with pick up and transporting of the records.
- A copy of the completed CROWN Archiving Register shall be kept by the Department/Faculty.
- Records can be retrieved from CROWN for information retrieval or destruction by contacting the Corporate Assurance & Risk Team, quoting the relevant carton barcodes.
- Twice a year UCOL receives Destruction Review Reports from CROWN identifying inactive archived records that can be destroyed. These reports are forwarded on to the relevant departments/teams for action.
- UCOL's General Disposal Authority is to be referred to when determining the retention period and disposal action of inactive records.

#### *Vital Records*

These records have permanent or continuing value relating to the history and activities of UCOL. There are two different types of vital records covered under UCOL's General Disposal Authority. (**Note.** Vital records can be in **both** physical and electronic formats.)

- UCOL Retained: These records are to be kept indefinitely and are sent to CROWN by contacting the Corporate Assurance & Risk Team.
- Public Archives: These records are transferred to Archives New Zealand at the end of the retention period (retention periods are specified in UCOL's General Disposal Authority). A UCOL Disposal Register Template is to be completed and forwarded, along with the relevant records, to Corporate Assurance and Risk.

### 3. Management of Electronic Records

Electronic records should be managed with the same care as physical records. It is each department/team's responsibility to maintain the format and integrity of these records. There are several practices which can be followed to ensure the context and the integrity of business records are maintained.

- Use of folders and metadata: The management of folders and files is easier when using limited folder levels. Naming folders and files enables the easy retrieval of information now and in the future. Metadata is valuable when compiling or searching for information.
- Shared drives: Only store files on Team shared drives. Avoid the use of the "h" (home) drive for work purposes as this does not promote good records practice. Use of the "h" drive creates access issues when a staff member is absent or exits the organisation.
- Dates and filepaths: Insert the filename and path in the footer of the document for others to easily find the document. It is also prudent to add dates to the document for context purposes.
- File naming: Use meaningful and descriptive document names.
- Versioning: Always version control documents.

#### **Digitisation**

When moving physical records to electronic keeping systems of records, there are a wide range of benefits in doing so, but also substantial risks.

To manage these activities, Archives New Zealand have published a Digitisation Standard ("Destruction of Source Information after Digitisation"). The purpose of the Standard is to ensure that the scanned copies retain all the evidential qualities of the paper originals, so they can be relied on as records of business activities. Without controls and proper access, scanned documents may not be admissible as evidence if challenged in court or could be open to manipulation or alteration, placing UCOL at risk of financial or reputational harm.

The Standard applies to ongoing, routine scanning of original documents where the business activity takes place on the scanned record rather than on the original source document, and where the scanned record has therefore become the official record. The Standard also applies when departments/teams wish to scan source records and destroy the originals.

Teams who are intending to digitise their records should refer to the Archives NZ Standard for guidance to ensure the integrity of the record is maintained.

### 4. Security and Access of Records

Records' storage areas at UCOL must provide a safe and hazard-free environment for active and inactive records, i.e. records must be securely stored and maintained to adequately protect against unauthorised access, alteration, loss or damage, environmental hazards and pests. Off-site archive storage is centralised through Crown (via the Corporate Assurance & Risk Team).

All records containing confidential or private material will be handled in accordance with the Privacy Act 1993 (Privacy Act 2020 from 1 December 2020) and other relevant legislation.

Vital records will be identified and managed in a secure and protected way (*refer (2) Management of Physical Records / Vital Records*).

## 5. Information Sharing and Use of Records

Records must be available to appropriate audiences in accordance with the provisions of the appropriate regulatory framework (e.g. Official Information Act 1982).

Records will be used with care and respect so as not to damage or compromise their integrity. UCOL has a number of different repositories and systems that are used to manage its information and records. UCOL's information must be stored in approved repositories as listed below:

- Well managed hard copy record systems;
- Approved and supported line of business systems and databases; and
- Legacy systems.

UCOL's information must not be stored in unapproved repositories, for example:

- Personal electronic devices (e.g. tablets, smartphones);
- Personal drives/personal cloud storage (e.g. Google Docs, Dropbox, OneDrive etc);
- Temporary storage devices such as USB flash drives, CD/DVDs, portable hard drives;
- Hard drives of UCOL laptops or PCs.

## 6. Disposal of Records

The retention and disposal of inactive records must be undertaken in accordance with the relevant disposal authorities issued by Archives New Zealand – no member of staff can dispose of records unless authorised to do so.

- Disposal of records must be documented to ensure justification and accountability of disposal actions and for future reference.
- A Disposal Register Template must be completed for UCOL inactive records that are to be destroyed.
- UCOL's General Disposal Authority is to be referred to when determining the retention period and disposal action of records.
- Upon completion of the Disposal Register Template, an authorised manager must approve the Disposal Register prior to the record being destroyed.
- A copy of the authorised Disposal Register must be sent to the Corporate Assurance & Risk Team for auditing purposes.
- All records authorised for destruction must be placed in a secured confidential destruction bin.

Copies of records (e.g. duplicates held for reference) can be destroyed but the original must be kept until the life the record expires under the General Disposal Authority.

Never cull individual papers from a file. A record by itself may be of little value but in the context of the other records in the same file, may hold significant evidence. Culling records destroys the integrity of the file by breaking the transactional chain of evidence.

## 7. Information Ownership

All records created and received by staff in the course of carrying out UCOL's business are the physical and intellectual property of UCOL, not individual staff members, business units or contractors.

Records (both physical and digital) are the property of UCOL and therefore no copies of UCOL's records shall be made for personal use unless authorised by an Executive Manager or the Chief Executive. This also applies to instances whereby an employee is exiting the organisation, i.e. no records of UCOL (physical or digital (including emails)) shall be taken with the employee or deleted/destroyed by the employee prior to their departure without the prior permission of an Executive Manager or Chief Executive.

UCOL has the right, at any time and for any reason to require the return of devices that hold information (i.e. software, hardware, files, digital files) on no notice at all for monitoring/checking/backing up to preserve official information and to check compliance with policies and obligations.

## 8. Roles and Responsibilities

The table below defines information management roles and responsibilities of all UCOL staff.

Position	Responsibilities
<b>Chief Executive and Leadership Team</b>	<ul style="list-style-type: none"> <li>• Authorising the Recordkeeping Policy and Procedure.</li> <li>• Ensure compliance with UCOL's Recordkeeping Policy and Procedure.</li> <li>• Ensure recordkeeping is sufficiently supported, including the provision of adequate budget.</li> <li>• Assign responsibilities for recordkeeping.</li> <li>• Ensure organisational compliance with legislative requirements for recordkeeping, including the Public Records Act 2005.</li> <li>• Champion high quality information and records management.</li> <li>• Ensure UCOL creates records of its affairs in accordance with policy requirements.</li> <li>• Ensure policy exists to prevent unauthorised disposal of records.</li> <li>• Ensure continuous improvement of recordkeeping at UCOL results in staff working towards meeting best practice guidelines.</li> </ul>
<b>Business Owners (UCOL managers and team leaders)</b>	<ul style="list-style-type: none"> <li>• Ensure staff are aware of UCOL's recordkeeping policy and procedures.</li> <li>• Ensure all new staff receive information/records management induction and training.</li> <li>• Champion high quality information and records management.</li> <li>• Ensure information management is a design component of all systems and service environments.</li> <li>• Ensure information management is integrated into work processes, systems and services.</li> <li>• Monitor staff understanding of and compliance with the UCOL Recordkeeping Policy and Procedure.</li> <li>• Ensure appropriate recordkeeping practices are implemented in team.</li> <li>• Support and foster a culture that promotes good information management practices.</li> <li>• Ensure there is an adequate budget to meet UCOL recordkeeping responsibilities.</li> <li>• Ensure recordkeeping practices meet best practice guidelines and can stand up to external scrutiny.</li> <li>• Ensure the integrity and security of records when employees leave the organisation.</li> </ul>

<b>All UCOL Staff</b>	<ul style="list-style-type: none"> <li>• Understand and comply with UCOL’s recordkeeping policy and procedures.</li> <li>• Create a full and accurate record of activities, transactions and decisions carried out during the course of business activities.</li> <li>• Ensure records are maintained by being captured into UCOL’s recordkeeping systems, rather than in personal systems, and ensure records are filed accurately.</li> <li>• Ensure confidential or sensitive information is protected from unauthorised access.</li> <li>• Request assistance/clarification of any records management process/practice as required.</li> <li>• Ensure the release of information, where appropriate.</li> <li>• Keep information on UCOL premises to avoid security and privacy breaches. Only in exceptional circumstances should information be removed from UCOL premises.</li> <li>• Obtain appropriate written authority prior to destroying or transferring records.</li> <li>• Follow records retention and disposal requirements at all time to ensure compliance with UCOL policy and procedure and the Public Records Act 2005.</li> <li>• Safeguard and protect information so it is retained for as long as it is needed for business, legal and accountability requirements.</li> <li>• Prevent inadequate disposal practices in line with the approved records disposal authority.</li> <li>• UCOL’s recordkeeping systems should not be used to store or manage personal records which do not have organisational value.</li> </ul>
<b>Contractors</b>	<ul style="list-style-type: none"> <li>• Must adhere to the Recordkeeping Policy and Procedure as if they were UCOL staff.</li> <li>• All UCOL staff obligations will apply at all times to Contractors in respect to the management of UCOL information.</li> </ul>
<b>Corporate Assurance &amp; Risk</b>	<ul style="list-style-type: none"> <li>• Business owner of the Recordkeeping Policy and Procedure.</li> <li>• Monitor and audit compliance with UCOL’s Recordkeeping Policy and Procedure</li> <li>• Ensure information about UCOL recordkeeping policy procedures and systems are communicated throughout the organisation.</li> <li>• Provide staff training, guidance and advice in using UCOL recordkeeping systems.</li> </ul>

## Definitions

For the purposes of this policy and procedure, the following definitions apply:

<b>Term</b>	<b>Definition</b>
<b>Active Records</b>	Those records required for the day to day functioning of UCOL. Also referred to as current records.
<b>Archive Records</b>	Those records, no longer required for current use, but with permanent or continuing value relating to the history and activities of UCOL.
<b>Creation and maintenance</b>	The process and act of creating records that are accurate, authoritative and reliable, and managing these records over time in a way that ensures their accessibility and usability for as long as it is necessary to meet legal obligations and business requirements.
<b>Destroy</b>	The record may be destroyed by an approved method, for example, secure shredding, deleting the record from a shared drive once the retention period is complete, and signed off for destruction.
<b>Disposal</b>	The final decision concerning the fate of a record, i.e. destruction, transfer to archives or records that will be retained indefinitely.

<b>Electronic Records</b>	Records capable of being processed in a computer system and/or stored at any instant in a medium which requires electronic or computer equipment to retrieve them. Includes the digitized form of paper records.
<b>General Disposal Authority</b>	A formal authorisation issued by the Chief Archivist under the Public Records Act which provides UCOL the authority to dispose of records.
<b>Inactive Records</b>	Those records no longer required for the conduct of business and which may be transferred to intermediate storage, archival custody, or be destroyed.
<b>Metadata</b>	This can be described as “data about data”. A fuller description is “structured information that describes and/or allows for finding, managing, controlling, understanding or preserving other information over time”.
<b>Public Record</b>	A record created or received by a public office in the conduct of its affairs. This includes records declared to be public records. This does not include records collected for purposes such as research or teaching records created by academic staff used to deliver a lecture or presentation or records created by students of a tertiary education institution, unless the records have become part of the records of that institution.
<b>Record</b>	Information created, received and maintained as evidence and information by an organisation or person in pursuance of legal obligations or in the transaction of business, including emails.
<b>Recordkeeping</b>	The creation and maintenance of complete, accurate and reliable evidence of business transactions in the form of recorded information.
<b>Recordkeeping systems</b>	Approved information systems which capture, maintain and provide access to records over time.
<b>Records management</b>	The field of management responsible for the efficient and systematic control of the creation, receipt, maintenance, use and disposition of records.
<b>UCOL Retained</b>	This material is identified as being of permanent value to UCOL but does not meet the criteria for transfer to Archives NZ. This material is kept indefinitely in CROWN storage.
<b>Vital records</b>	Those records that are essential for the ongoing business of UCOL and without which the organization could not continue to function effectively. Examples include: contracts, current financial, staff and payroll records, student academic records, systems documentation, business continuity plans, emergency contact details etc. The identification and protection of vital records is a primary concern of records management and disaster planning.

## Legislative Framework

UCOL is accountable for the conduct of its business as evidenced in the records of its business activities and transactions. UCOL is subject to both legislative and regulatory requirements including, but not limited to:

### Legislation

- Public Records Act 2005
- Official Information Act 1982
- Privacy Act 1993 (Privacy Act 2020 from 1 December 2020)
- Electronic Transactions Act 2002
- Employment Relations Act 2000
- Copyright Act 1994
- Education and Training Act 2020



## **Standards and Codes**

- [Archives New Zealand Information and Records Management Standard July 2016](#)
- [Health Information Privacy Code 1994](#)

## **Related Documentation**

- [UCOL Recordkeeping Management SharePoint Site](#)
- UCOL General Disposal Authority
- UCOL Disposal Register (Physical Records)
- UCOL Disposal Register (Electronic Records)
- CROWN Archiving Register Template
- Records Management Quik Guide