

## INFORMATION AND RECORDS MANAGEMENT POLICY

<b>Section</b>	University Management
<b>Contact</b>	Information and Records Management
<b>Last Review</b>	October 2017
<b>Next Review</b>	October 2020
<b>Approval</b>	SLT 17/10/151

### **Purpose:**

To provide an information and records management (IRM) framework and establish principles and accountabilities for ensuring that information and records are effectively managed as valuable assets that form part of the corporate governance, meeting the legislative, best practice and business requirements of the University.

### **Mandate:**

The Archives New Zealand Information and Records Management Standard states that information and records are key strategic assets at the core of public sector business and government accountability. The Standard is issued by the Chief Archivist under section 27 of the Public Records Act 2005 (PRA). It is mandatory for the University to manage its information and records to the standard.

Information and records help the University plan for and achieve valuable and relevant short-term and long-term outcomes that benefit the University, government and wider community. Adhering to the standard ensures that the University manages information and records efficiently and systematically. It sets out the minimum level of compliance that the University must meet in accordance with the PRA.

A major focus of the standard is to support effective information and records practices in complex business and government environments.

### **Audience:**

This policy applies to academic and professional staff of the University and its affiliated organisations, including its business enterprises such as wholly owned subsidiary companies, joint venture companies, partnerships, trusts and research centres. It also applies to volunteers and independent contractors in the course of their work for and on behalf of the University.

### **Policy:**

Information and records will be managed as corporate assets, similarly to financial, people and physical assets of the University. Information and records will be effectively managed to create business value, reduce duplication and support a collaboration culture with the embedded use of a fully integrated digital collaborative environment.

All staff are responsible for the management of this asset on behalf of the University.

Under the Public Records Act, all staff of the University, its affiliated organisations and any organisations contracted to deliver services on Massey's behalf have to create and maintain **full and accurate records** of the University's business activities and decisions, in accordance with its normal or prudent business practices.

All records must be compliant with the recordkeeping requirements arising from the regulatory and accountability environment in which Massey operates.

To support effective management of our information and records assets, the following principles will apply:

- a) Information and records are appropriately managed in accordance with their value to the University.
- b) Information management initiatives will support the strategic priorities and leverage the existing investment of the University.
- c) Information management initiatives will be suitably resourced, planned and implemented to support the goals of the University.
- d) Information is created, collected and organised in a way that is legally compliant, and that ensures its integrity, quality and usability.
- e) Information is shared and will be collected or created once, then used as many times as required, provided that confidential and personal information are protected in a manner that meets the University's business and legal obligations (e.g. Privacy Act 1993, Official Information Act 1982).
- f) Information and records are easy to find and accessible over time. Their access and use will be prudently managed to ensure security and compliance with legislative and business requirements.
- g) All University's content (including emails and Office 365) will be carefully managed within a system of assurance, while also being subject to legal and regulatory requirements.
- h) Information and records are secure and protected from corruption, damage, unauthorised access, use or disclosure.
- i) Massey's Electronic Document and Records Management System (EDRMS), also named as OneMassey Collaboration sites, must be used for managing official documents and records of the University. This includes content not managed in our line of business systems, e.g. Finance, HR, Student Management, or any other recordkeeping systems at Massey.
- j) Information and records management risks will be taken into consideration for all IT-enabled projects and services including the adoption of Cloud computing services.
- k) The record copy should be unique and original and should be held once only, by the originator or person who originally created or received it.
- l) Records are captured when created or received into a University recordkeeping system. They are classified according to Massey's business classification scheme.
- m) Records must not be created and maintained in any personal (or private) cloud storage services (e.g. Dropbox, Google Docs, iCloud, and so on). OneDrive for Business must not be used for managing official business records.
- n) Metadata are assigned and maintained throughout the records lifecycle. Metadata for disposal of records will be generated or captured, and managed systematically for as long as required to account for the disposal.
- o) Vital records are identified and managed in a secure and protected way.
- p) Disposal is planned and regularly implemented in accordance with the IRM procedures, ensuring that

information and records are retained without premature destruction, as well as without being kept for longer than required. The retention and disposal of records must be undertaken in accordance with the principles of the approved General Disposal Authorities (GDA) for the University.

- q) Approval must be sought before destroying the source records after digitisation. When all retention periods beyond the statutory minimums have passed, personal information will not be retained (or will instead be rendered non-identifiable) under the Privacy Act, unless the University has a lawful purpose to retain it.

Note: Some records are excluded from Government or external scrutiny but must still be managed within the IRM framework as if they were. This adds consistency and value to all staff and stakeholders who access them.

### **Information and Records Ownership:**

Information and records created in the course of the University's business are owned by the University and subject to its control – unless otherwise superseded by another University Policy or Agreement.

Information and records created by a contractor during the course of a contract belong to the University and should be captured and managed in the University recordkeeping systems - unless otherwise agreed in the formal contract specifying any exclusion.

### **Responsibilities:**

The **Vice-Chancellor** has ultimate responsibility for ensuring that the University meets its statutory and accountability obligations in information and records management.

The **AVC People and Organisational Development** is the Executive Sponsor of Massey University under the new standard of the Public Records Act, and is responsible for:

- The oversight of all strategy and policy on information and records management through the execution of the University IRM Programme of work.

**Senior Leadership Team, Heads of Departments (or equivalents)** are responsible for:

- Ensuring that funds and resources are available for the provision of IRM programmes that meets the requirement of this policy.

**Business Owners, Managers (or equivalents)** are responsible for:

- Ensuring that staff are aware of Massey University's IRM policies and procedures and that Information Champions are identified. By default, the Manager will act as the Information Champion for their responsible area.
- Ensuring that information and records management is integrated into business processes, systems and services.
- Information and records are managed across all operating environments in their area of responsibility.
- Ensuring that information and records management responsibilities are identified and addressed in outsourced and service contracts, instruments and arrangements.
- Assigning recordkeeping responsibilities and liaising with the IRM team for advice and assistance.
- Ensuring that the obligations regarding the retention, digitisation and disposal of records are met; including no records are destroyed, altered, sold or transferred without authorisation by using the GDA or as authorised by the Director, Information and Records Management.
- Ensuring that there are funds and resources to meet Massey University's recordkeeping responsibilities.

**Information Champions** are responsible for:

- Assisting staff in adhering to the IRM policies and procedures.
- Assisting the IRM team in communicating the objectives of IRM programmes.
- Ensuring that new staff know where to find information on how records are managed and are trained in the procedures related to information and records management.

The **Director, Information and Records Management** is responsible for:

- Leading the development and implementation of strategies and policies relating to information and records management for the University.
- Ensuring that the University IRM Programme of work is effectively implemented and maintained through continuous business improvement This includes the implementation of IRM components within the digital collaborative workplace at Massey.
- Providing direction on the development and implementation of IRM training programmes at Massey.
- Ensuring that auditing processes and monitoring controls are in place for effective recordkeeping at Massey.
- Providing policy advice and strategic guidance to support information and records management across the University.
- Authorising the disposal of records (inc. destruction of source documents after digitisation) and assigning access restrictions to records in accordance with the legal and business requirements.

The **Information and Records Management (IRM) Team** is responsible for:

- Providing IRM services, user support and training for the implementation and maintenance of the University IRM Programme of work.
- Coordinating recordkeeping activities and liaise with staff and the Information Champions for the promotion of IRM best practices.
- Developing and implementing effective document and records management within the digital collaborative workplace of the University.
- Coordinating with relevant staff for the lodgement, storage, retrieval, sentencing and archiving of records.
- Assisting in the identification and registration of legacy records into the University recordkeeping systems.
- Coordinating the appraisal and disposal of records in accordance with the standard procedures.
- Providing advice, training and guidance on information and records management as required.
- Implementing auditing and monitoring systems on the compliance and effectiveness of recordkeeping at Massey.

The **Information Technology System (ITS)** group is responsible for:

- Ensuring that the maintenance of the business and information systems and electronic repositories at Massey is consistent with the requirements described in this policy.
- Working in partnership with the IRM team to ensure that information and records management are design components of information systems (e.g. Office 365), especially where high risk/high value business is undertaken.

- Coordinating with the IRM team where necessary in the development of information-related policies and maintenance of technology for the business and information systems at Massey, including maintaining appropriate system accessibility, security, backup and disaster recovery.
- Information and records are maintained through systems and service transitions by strategies and processes specifically designed to support business continuity and accountability.

The **University Archives team** is responsible for:

- Appraising for historical and archival value records identified under the GDA in accordance with the IRM procedures.
- Maintenance and storage of archival records to the appropriate standard and in accordance with the PRA requirements.
- Managing access and use of archival records within their holdings.
- Arrangement and describing of the archival records according to established principles of archival description.
- Maintaining appropriate metadata for archival records in accordance with the appropriate standards and the IRM procedures.
- Assisting in the transfer of archival records to Archives New Zealand or an Archives New Zealand approved repository in accordance with the GDA and the IRM procedures.

**All Staff** are responsible for:

- Complying with the University's Information and Records Management policies and procedures.
- Creating full and accurate records of business activities and decisions and storing these records in University recordkeeping systems.
- Ensuring that low-level administration and housekeeping materials are distinguished from official business records.
- Retaining and disposing records according to the principles of the GDA and the established disposal processes.
- Preventing any unauthorised access to records and ensuring that personal or sensitive information is protected.
- Liaising with the IRM team when advice, training and guidance are required.

**All volunteers and independent contractors** are responsible for:

- Complying with the University's Information and Records Management policies and procedures.

## Definitions:

**Approved Repository** means a repository approved by the Minister responsible for Archives New Zealand for public archives under the Public Records Act. Under PRA section 21 (1), every public office must transfer possession and control of public records that have been in existence for 25 years:

- a) To the possession of Archives New Zealand and the control of the Chief Archivist; or
- b) To the possession of an approved repository and the control of the Chief Archivist

**Appraisal** under the Public Records Act refers to the process of evaluation business activities. Include analysis of business context, business activities and risk to enable decision-making on what records to create and capture, and how to ensure the appropriate management of records over time.

**Affiliated Organisations** mean those organisations or entities where the University has an ownership stake of 50% or more.

**Business Activity** is an umbrella term covering all the functions, processes, activities and transactions of the University and its employees that are related to the management and administrative functions of the University. It excludes activities related to personal research.

**Business Classification Scheme** is the conceptual, hierarchical, representation of the functions and activities performed by an organization. A business classification scheme is usually a taxonomy derived from the analysis of business activity. Tool for linking records to the context of their creation.

**Cloud Computing Services** are any services made available to users on-demand via the internet from a cloud computing provider's servers, as opposed to being provided from Massey's own on-premise servers. This includes Software as a service (SaaS) - A software licensing and delivery model in which software is licensed on a subscription basis, is centrally hosted by a third-party provider and is made available to customers via the Internet.

**Digitisation** is a method of converting hard-copies of non-digital records into digital format. Examples of digitisation include scanning or imaging, taking digital photographs of the non-digital source records, or converting analogue voice recordings to digital media. (AS/NZS ISO 13028:2012)

**Disposal** is the final decision concerning the fate of records. In relation to a public record, it means:

- a) the transfer of control of record; or
- b) the sale, alteration, destruction, or discharge of a record.

**Document Management** refers to a process for managing the life cycle of a document, including inception, version creation, publication, storage, retention and disposal. This usually refers to electronic documents, and uses specific document management software.

**EDRMS (Electronic Document and Records Management System):** The University's EDRMS (also named as OneMassey Collaboration sites) is comprised of SharePoint, RecordPoint and Colligo, which are key to the Digital Workplace at Massey. OneMassey is also comprised of the University Intranet, where work-related information is published for staff consumption.

The EDRMS is specifically designed to manage the creation, management and disposal (inc. archival) of electronic records (inc. emails) for the purposes of providing document management functionality and evidence of business activities for the University. The system maintains appropriate contextual information and metadata, as well as links between records to support their value as evidence.

**Full and accurate records** in this policy refer to records which are created to the extent necessary to:

- facilitate action by staff, at any level, and by their successors;
- make possible a proper investigation of the conduct of business by anyone authorised to undertake such scrutiny, and;
- protect the financial, legal and other rights of the University and any others affected by its action and decisions.

**General Disposal Authorities (GDA)** refer to the disposal authorities issued by the Chief Archivist of Archives New Zealand. A GDA sets out the authority and criteria for retention and disposal for specified records 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. (AS/NZS ISO 16175-1:2012)

**Information Management** concerns the identification, accountability, accessibility, corporate importance and optimisation of the value of information through its lifecycle, with an aim to generate business and customer value, achieve competitive advantages, and support the operational and strategic goals of an organisation.

**Metadata** is structured data that describes and/or enables finding, managing, controlling, understanding or preserving information overtime. Recordkeeping metadata enables the creation, management and use of records through time. It can be used to identify, authenticate and contextualise records and the people, processes and systems that create, manage and use them.

**Managed Metadata (Taxonomy)** in this policy refers to a hierarchical collection of centrally managed terms that can be defined and then used as attributes (values) for list and library items in SharePoint at Massey. They can also be used for tagging and searching for information.

**Office 365** is a set of online services which are included under Massey's site licensing arrangements with Microsoft. They include online versions of office applications, document storage and other collaboration tools that are enabled over the Internet (cloud services). Massey licensing also enables staff to download Office software to their personal devices.

**Personal Information** means information about an identifiable individual.

**Record** in this policy refers to information recorded in any form that is created or received and maintained in the transaction of business activities and retained as evidence of such an activity by Massey University (inc. all staff, affiliated organisations and anyone contracted to deliver services on its behalf). This covers all functions of the University including management, academic and administration. A record may be a document, signature, seal, text, image, sound, speech or data, and it can be in audio, electronic (including web pages) or physical format.

Apart from records outlined in the General Disposal Authority for New Zealand Universities, this also includes:

- teaching and research materials owned by the University, and
- the records of the University's affiliated organisations.
- research data, whether received from external parties or created by the University (which shall at all times be subject to research protocols and the Privacy Act).

This excludes:

- an individual's documents, correspondence or personal papers that have been created in a private capacity,
- materials received for information only,
- primary drafts and working papers not recording decisions,
- published research that are not covered by the University's Intellectual Property Policy,
- copies of documents kept for personal reference or convenience.

**Public Records** means any records, in any form, in whole or in part, created or received by a public office (such as Massey University) in the course of its business which are covered by the Public Records Act 2005. The GDA provides a detailed guide to the various types of Public Records. The term 'Public Record' does not necessarily imply public access or the placement of such records into the public arena.

This excludes records not covered by the Public Records Act, i.e. teaching and research materials generated by academic staff or students, including (but not limited to) raw data, analysed data, working notes and publications.

**Recordkeeping System** refers to a system which captures, manages and provides access to records over time. The system can be manual or electronic, depending on the records formats and the operating environment. A manual system, such as corporate filing systems and registers, may be appropriate to capture and maintain physical records. A business information system or database application (e.g. finance system, HR system), while not a dedicated recordkeeping system, may incorporate aspects of recordkeeping functionality.

**Records Management** is the 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.

**Sentencing** refers to the process of identifying and classifying records according to a disposal authority and the act of applying a disposal action specified in it to the record.

**Vital Records** refers to records that are essential for the ongoing business of the University and without which the University could not continue to function effectively. Examples include: contracts, current financial, staff and payroll records, student academic records, research data, systems documentation, business continuity plans, emergency contact details, etc.

### **Legal compliance:**

- Commercial Legislation
  - *Companies Act 1993*  
Includes provisions requiring the maintenance of a share register (s 87 - 94), company records (s 189 - 191), accounting records (s 194), and audit and reporting obligations. It allows the inspection of company records (s 178 - 179 and s 215 - 218). Other provisions include the registration of companies with the Registrar of Companies.
- Education Sector Legislation
  - *Education Act 1989 and amendments*  
Covers recordkeeping requirements for all documents relating to the creation of annual reports, minutes and other statutory council and board records.
  - *Massey University Act 1963*  
Covers the University as an entity and provides for recordkeeping requirements of specific regulatory documents.
- Employment Legislation
  - *Employment Relations Act 2000*  
Contains recordkeeping requirements for redundancy of employment records (s69). There are specific information requirements relating to wage and time records (s130), part 6A Continuity of employment if employees' work affected by restructuring, records concerning strikes and lockouts (s98).
  - *Health and Safety at Work Act 2015*  
Contains recordkeeping requirements such as maintaining registers of accidents and serious harm, and health and exposure monitoring records. Records retention is up to 40 years after the date on which the record is made.

■ Financial Legislation

- *Financial Reporting Act 1993*  
Defines the standards to be used in preparing financial reports and obligations in respect of the preparation and audit of financial statements.  
See also Public Finance Act 1989 for relevant sections
- *Goods and Services Tax Act 1985*  
Includes requirements for the keeping of records to support the administration of the Goods and Services Tax system (s 75) and their retention for a period of at least seven years after the end of the taxable period to which they relate.
- *Income Tax Act 1994*  
Includes requirements to furnish records to support specific rebates or deductions, such as those for demonstrating the business use of motor vehicles (s DH2 - 3).
- *Tax Administration Act 1994*  
Requires taxpayers and employers to keep records in relation to business matters for tax purposes. Such records are to be retained for at least seven years after the end of the income year to which they relate (s 22 (2)). Other recordkeeping provisions include the Inland Revenue Commissioner's powers to obtain information, the furnishing of tax returns, and the secrecy of information provided in relation to tax matters.

■ Intellectual Property Legislation

- *Copyright Act 1994*  
Contains references to the requirements for documenting copyright in original works, transferring copyright and licensing for use/copying. Includes documentation requirements for hearings of the Copyright Tribunal. Copyright Regulations also apply.
- *Designs Act 1953*  
Contains recordkeeping requirements for all documents associated with the creation and registration of a design with the Patents Office. Includes specific requirements regarding the creation and accessibility of the Register of Designs. Designs Regulations also apply.
- *Patents Act 1953*  
Contains recordkeeping requirements for all documents associated with the application for and certification of New Zealand patents. Includes specific requirements regarding the creation and accessibility of the Register of Patents. Patents Regulations also apply.
- *Trade Marks Act 2002*  
Covers recordkeeping requirements for all documents relating to the application for and certification of New Zealand registered trademarks. Includes specific requirements regarding the creation and accessibility of the Register of Trademarks. Trade Marks Regulations also apply.

■ Health-related Legislation

- *Health Act 1956 and amendments*  
Addresses the legal implications and requirements for the use and transfer of patient records.
- *Health (Retention of Health Information) Regulations 1996*  
Addresses outlines the legal requirements for the retention of patient records by PHOs, private hospitals and doctors in private practice.
- *Health Information Privacy Code 1994*  
Outlines the requirements for storage of patient records and also provides for the non release of information to patients in certain circumstances.

- *Code of Health and Disability Services Consumers' Rights*  
Addresses the requirements for recordkeeping relating to the rights of patients cared for under the provisions of the Health and Disability Acts.
- *General Disposal Authority for District Health Boards*  
Provides best practice for the retention and disposal of patient records.
- Privacy Legislation
  - *Privacy Act 1993*  
Establishes a set of privacy principles to ensure the protection of personal information in respect of both public and private sector organisations. The Act is of prime importance and should be clearly understood by all information management professionals.
- Public Sector Legislation
  - *Public Records Act 2005*  
Provides for the selection of public records and archives for creation, maintenance and retention. Directs that public records and archives may only be destroyed or disposed of with the authority of the Chief Archivist. Provides for the deposit of public archives with the Archives of New Zealand and describes conditions for the management of material so deposited. Sets out the powers of the Chief Archivist in respect of current public records.
  - *Official Information Act 1982*  
Provides for access to official information, except where specific reasons for withholding it exist, such as national security or the protection of personal privacy.
  - *Ombudsmen Act 1975*  
Contains requirements for documenting complaints and the supply of written evidence to support complaints. Specifies access restrictions on a complaint or supplied evidence, and on publication of any summary report resulting from a complaint. Allows Ombudsman to review complaints, records and decision-making processes and procedures.
  - *Public Finance Act 1989*  
Covers the reporting requirements of the Crown, Government Departments and Crown Entities, including requirements for Audit Office issuing of Audit Opinions.
- Other Legislation
  - *Contract and Commercial Law Act 2017*  
The Electronic Transaction Act 2002, which contained obligations regarding digitisation and retention of electronic records, which are now covered by this Act.
  - *Evidence Acts*  
The Evidence Act 1908 governs the admissibility of documents and records in Courts. This Act lacks a definition of documents, but the Evidence Amendment Act 1945 defines them as including “books, maps, plans, drawings and photographs”. Since both Acts were written before the development and widespread use of computers they do not address the issues of machine generated information. The Evidence Amendment Act (No. 2) 1980 governs the admissibility of business records as documentary hearsay evidence. In 1999, the Law Commission published a report (NZLCR55: Evidence Part Two: Evidence Code and Commentary. 1999) that contained significant proposed changes to legislation. The report addressed issues such as the evidential value of machine-generated information and the definition of documents. In addition, amendments to the Act were passed in 2006 further defining “a document”.
  - *National Library of New Zealand Act 2003*  
Provides for the deposit of published documents by Crown Entities and other State owned or funded enterprises. The Act requires that identical copies of the published document be provided.

### **References:**

Australian Standard AS 4390, Records Management, Homebush (NSW), 1996  
International Standard ISO 15489-1:2016, Information and Documentation – Records Management  
Archives New Zealand's guidance on information and records management ([www.records.archives.govt.nz/](http://www.records.archives.govt.nz/))  
Information and Records Management Standard for the New Zealand Public Sector, 2016  
ICA-Req Module 2 Guidelines & Functional Requirements for Electronic Records Management Systems, 2008  
ICA-Req Module 3 Guidelines & Functional Requirements for Records in Business Systems, 2008  
Using Cloud Services, ICT Government, New Zealand ([www.ict.govt.nz/guidance-and-resources/using-cloud-services/](http://www.ict.govt.nz/guidance-and-resources/using-cloud-services/))  
Medical Council of New Zealand – Maintenance and Retention of patient records

### **Related procedures / documents:**

Business Classification Scheme  
Data Management Policy  
Disposal Procedure  
GDA for New Zealand Universities  
Official Information Policy  
Offsite Storage Procedure  
OneMassey SharePoint Collaboration Site Guidelines  
Privacy Policy and Privacy Framework  
IRM guidelines and resource documents  
    Guidelines on information management and cloud computing  
    Guidelines on recordkeeping and digitisation  
    Guidelines on managing records on business systems  
    Guidelines on information management and social media  
Research Protocols in force from time to time or as agreed with data providers

### **Document management control:**

Prepared by: Director, Information and Records Management  
Owned by: Assistant Vice-Chancellor People and Organisational Development  
Approved by: Senior Leadership Team  
Date issued: 7 March 2007  
Last review: October 2017  
Next review: October 2020