

RECORDS MANAGEMENT POLICY

Section	University Management
Contact	Records Management
Last Review	August 2015
Next Review	August 2017
Approval	Council C15/89 – October: 4.3.2

Purpose:

To provide a framework, establish accountabilities and maintain recordkeeping practices and principles thereby ensuring that full and accurate records of the business transactions, actions and decisions of Massey University are created and that these records are used, maintained, made accessible, stored and legally disposed of in a manner that meets all relevant legislative, regulatory and University requirements in accordance with prudent business practice.

Policy:

All staff of the University, its affiliated organisations and any organisations contracted to deliver services on Massey's behalf will create and maintain full and accurate records of the University's business activity, in accordance with its normal, prudent business practice, and capture them in a University recordkeeping system. The following recordkeeping principles will apply to all records:

- Records must be accurately and securely captured when generated or received.
- These records should be full and accurate to the extent necessary to:
 - facilitate action by University employees, 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.
- 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.
- Records must be stored in a manner that ensures that they are accessible to authorised staff but protected from theft, misuse, modification, damage and loss; and accessible over time.
- Access to records must be controlled to ensure compliance with legislation and the University Records Management procedures.
- Records must be classified according to an approved Business Classification Scheme.



- Metadata will be assigned and persistently linked to records and aggregations of records.
- Metadata for disposal of records will be generated or captured, and managed systematically for as long as required to account for the disposal.
- Inactive records will be moved to appropriate offsite storage and managed there in accordance with the Offsite Storage procedures. If necessary, inactive electronic records may be stored in second or third-tier storage in order to avoid affecting the speed and availability of the recordkeeping system.
- Vital records will be identified and managed in a secure and protected way.
- The retention and disposal of records must be undertaken in accordance with the approved General Disposal Authority (GDA) for Universities and any variations of this that have been approved by Archives New Zealand for use by Massey University.
- In accordance with the provision of the GDA certain classes of record will automatically be appraised for historical or legacy value by the University Archivist at time of sentencing and the custody of these records will pass to the University Archives at this time. Electronic Records in the Electronic Document and Records Management System (EDRMS) will be appraised automatically in accordance with the GDA based on rules and reports run within the EDRMS.

All records must be:

- Compliant with the recordkeeping requirements arising from the regulatory and accountability environment in which Massey operates.
- Adequate for the purpose for which they are kept.
- Complete or include the structural and contextual information necessary to document and action.
- Meaningful – containing metadata, information and/or linkages that ensure the business context in which the record was created and used is apparent.
- Accurate – to correctly reflect the transactions that they document.
- Authentic – enabling proof that they are what they purport to be and that their purported authors did indeed create them through the use of appropriate metadata.
- Inviolable – securely maintained to prevent unauthorised access, alteration or removal.
- Accessible within the provisions of the Public Records Act 2005, the Official Information Act 1982 and the Privacy Act 1993.
- Retained for the time allocated in the retention and disposal schedule and only disposed of with approval from an authorised person.

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

Records Ownership:

All records created or received by University staff in the course of their duties on behalf of the University are owned by the University and subject to its control – unless otherwise superseded by another University Policy or Agreement.

All 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 recordkeeping. The oversight of the administration of University records is vested with the AVC People and Organisational Development through the execution of the University Records Management Framework, to support the University's strategic goals and ensure compliance with the Public Records Act 2005 and best practices for recordkeeping.

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

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

Managers (or equivalents) are responsible for:

- Ensuring that staff are aware of Massey University's recordkeeping policies and procedures.
- Ensuring that appropriate records are created and maintained in their area of responsibility.
- Assigning recordkeeping responsibilities and ensuring that staff know where to go for assistance.
- Ensuring that no records are destroyed, altered, sold or transferred without authorisation by using the GDA or as authorised by the University Records Manager.
- Ensuring that there is a budget to meet Massey University's recordkeeping responsibilities.
- Ensuring that Information Champions are identified for each area of the business under the Manager's control. Otherwise, the Manager will act as the Information Champion for their responsible area by default.

Information (Records) Champions are responsible for:

- Assisting staff to adhere to the recordkeeping policies and procedures.
- Assisting the Records Management team to communicate the objectives of records management programmes.
- Ensuring that new staff know where to find information on how records are managed and are trained in the procedures related to recordkeeping.

The **University Records Manager** is responsible for:

- Leading the development and implementation of strategies and policies of recordkeeping and its associated systems to support efficiency and legislative compliance of the University.
- Ensuring that the University Records Management Framework is effectively implemented and maintained through continuous business improvement.
- Ensuring that the electronic and physical records management programmes are effectively delivered for the University.
- Ensuring that the business classification and recordkeeping metadata schemas (inc. managed metadata) are implemented and maintained for the University.
- Providing guidance on the development of records management training programmes and ensuring that all relevant staff receive appropriate records management and EDRMS trainings.
- Ensuring that the Information Champion network is established, mentored and trained.
- Coordinating with Massey's IT specialists and relevant staff to adopt technological solutions which enable effective management of documents and records.
- Ensuring that effective auditing processes and monitoring controls of the University recordkeeping systems are in place and adhered to.
- Providing policy advice and strategic guidance with regard to all recordkeeping practices and systems.
- Ensuring that sentencing of records occurs in accordance with the GDA and the Records Management procedures.
- Authorising the disposal of records as per University's Delegation Authority.
- Assigning access restrictions to records where necessary.

The **Records Management Team** is responsible for:

- Providing recordkeeping services and user support for the implementation and maintenance of the University Records Management Framework.
- Assisting in the improvement of recordkeeping work practices including the implementation and maintenance of the classification scheme, managed metadata and retention schedules in the hybrid work environment.
- Coordinating recordkeeping activities and liaise with staff and the Information Champions for the best service delivery and the promotion of good recordkeeping practices.
- Liaising with organisational units to assess their electronic records and document management requirements, and assisting them in the implementation of EDRMS to support their business and recordkeeping requirements.
- Developing and implementing the EDRMS across the University.
- Administrative management and maintenance of the University recordkeeping systems.
- Providing user support on electronic records and document management, and promoting user adoption within the EDRMS environment.
- Coordinating with relevant staff for the lodgement, storage, retrieval and archiving of records
- Liaising with the University Archives on the identification of records under GDA for historical or specific archival value at the time of sentencing in accordance with the Records Management procedures.



- 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.
- Maintaining EDRMS and Records Management Intranet sites and facilitating communication to the University community on recordkeeping matters.
- Providing EDRMS training to support its implementation at Massey.
- Providing advice, user training and guidance on recordkeeping as required.

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.
- Coordinating with the Records Management team where necessary in the maintenance of technology for the business and information systems at Massey, including maintaining appropriate system accessibility, security, backup and disaster recovery.

The **University Archivist** is responsible for:

- Appraising for historical and archival value, records identified under the GDA in accordance with the Records Management procedures.
- Appraisal of non record items for historical or archival value.
- Maintenance and storage of archival records to the appropriate standard and in accordance with the PRA requirements.
- Maintenance and storage of non record archives in an approved, compliant and controlled environment.
- Controlling access and use of archival records.
- 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 Records Management procedures.
- Transfer of archival records to Archives New Zealand or to an Archives New Zealand approved repository in accordance with the GDA and the Records Management procedures.

All Staff are responsible for:

- Complying with Massey University's Records Management policies and procedures.
- Creating full and accurate records of all business activity, including keeping records of work processes as identified in the procedures and documented workflow processes individual to the relevant department.
- Maintaining records using the approved format, naming conventions and storage units; and in accordance with the Records Management procedures.
- Ensuring that all business activities are adequately documented and the resulting records filed into and maintained by University recordkeeping systems.
- Ensuring that personal or duplicate materials are clearly separated from records.
- Appropriately storing records to ensure that they are securely stored and accessible over time.



- Retaining records according to the principles of the University's Retention and Disposal Schedule and not relinquishing control over, destroying, or removing records without authority.
- Following the established procedures for disposal of records.
- Preventing any unauthorised access to records and ensuring that personal or sensitive information is protected.
- Liaising with the Records Management team when assistance and advice is required.

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 to determine whether records are needed by the University and how long they should be kept for. Appraisal involves deciding which records of the University should be retained permanently as public archives, and which records should be destroyed once the University's business and accountability requirements have been met. This is based on analysis of the University's business activities, while weighing up community expectations about permanent retention of these records.

Archives means those records, identified for long term preservation for regulatory or historical reasons.

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 systematic identification and arrangement of business activities and/or records into categories according to logically structured conventions, methods, and procedural rules represented in a classification system.

Classification includes determining document or file-naming conventions, user permissions and security restrictions on records. The structure of a business classification scheme is hierarchical, moving from the general to the specific.

Disposal is the final decision concerning the fate of records, i.e. destruction or transfer to archives. This also includes the programme of activities to support transfer such as surveys, scheduling, and records destruction. Digitisation is also considered a disposal action and needs to be identified, controlled and source records approved for disposal prior to such digitisation occurring.

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.

Electronic Records are digital Records which are capable of being processed in a computer system and/or stored at any instant in a medium which requires electronic or computer equipment for retrieval. This includes digitised paper records.

Electronic Document and Records Management System (EDRMS) – Massey is implementing an EDRMS which has been specifically designed to manage the creation, use, maintenance and disposal (inc. archival) of electronic records (particularly email and document based records) for the purposes of providing evidence of business activities and facilitating effective information management across the University. The system maintains appropriate contextual information and metadata, as well as links between records to support their value as evidence. The EDRMS may also automate business processes such as workflows and approvals and be integrated with other business systems. The EDRMS at Massey, comprising of SharePoint, RecordPoint and Colligo, will contribute to Massey's strategic goals by improved organisational efficiency; supporting business continuity and legislative compliance.

Metadata is structured data that describes and/or enables finding, managing, controlling, understanding or preserving other 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.

Metadata Schema is a framework that specifies and describes a standard set of metadata elements and their interrelationships. Note: Schema provides a formal syntax (or structure) and semantics (or definitions) for the metadata elements.

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.

General Disposal Authority (GDA) refers to the sector-specific disposal authority issued by the Chief Archivist of Archives New Zealand for New Zealand Universities. It sets out the authority and criteria for retention and disposal for all records created or received by New Zealand Universities that are covered by the Public Records Act 2005.

Record in this policy refers to any 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.

This 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 means the creation and maintenance of complete, accurate and reliable evidence of business transactions in the form of recorded information. Recordkeeping includes the following:

- the creation of records in the course of business activity and the means to ensure the creation of adequate records;
- the design, establishment and operation of recordkeeping systems, including the definition of metadata; and
- 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).

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.

Retention and Disposal Schedule – See General Disposal Authority.

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.

University Archives means the organisational unit responsible for appraising, acquiring, preserving and making available archival material of the University.

University Archivist means the person responsible for the effective management and administration of the archives within Massey University.

University Records Management Framework is an organising framework that has a combination of key, interconnected elements which support effective and compliant recordkeeping at Massey within the operational, regulatory and legislative environments. The framework provides a basis for the University to identify and prioritise additional recordkeeping artefacts and improvement activities for further development. The current framework includes:

- Policy and procedures
- Business Classification Scheme
- EDRMS and recordkeeping tools
- General Disposal Authority
- Training and coaching programmes

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. The identification and protection of Vital Records is a primary concern of records management and disaster planning.



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.

Relevant legislation:

- Financial Legislation
 - Financial Reporting Act 1993
 - Public Finance Act 1989
 - Goods and Services Tax Act 1985
 - Income Tax Act 1994
 - Tax Administration Act 1994
- Māori and Treaty of Waitangi Legislation
 - State Owned Enterprises Act 1986, sec. 9
- Privacy Legislation
 - Privacy Act 1993
- Employment Legislation
 - Employment Relations Act 2000
 - Health and Safety in Employment Act 1992
- Commercial Legislation
 - Companies Act 1993
- Public Sector Legislation
 - Public Records Act 2005
 - Official Information Act 1982
 - Ombudsmen Act 1975
 - Public Finance Act 1989
- Intellectual Property Legislation
 - Copyright Act 1994
 - Designs Act 1953
 - Patents Act 1953
 - Trade Marks Act 2002
- Education Sector Legislation
 - Education Act 1989 and amendments
 - Massey University Act 1963
- Medical Legislation
 - Health Act 1956
 - Health (Retention of Health Information) Regulations 1996
 - Health Information Privacy Code 1994
 - Code of Health and Disability Services Consumers' Rights
 - Radiation Protection Act 1965



- Other Legislation
 - Electronic Transactions Act 2002
 - Evidence Acts
 - National Library of New Zealand Act 2003

Legal compliance:

- 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.
- Māori and Treaty of Waitangi Legislation
 - *State Owned Enterprises Act 1986, sec. 9*
This Act states: "Nothing in this Act shall permit the Crown to act in a manner that is inconsistent with the principles of the Treaty of Waitangi". This requires the Crown to act in good faith and make informed decisions. From this requirement the duty to consult has developed.
- Privacy Legislation
 - *Privacy Act 1993*
Establishes a set of privacy principles to ensure the protection of personal privacy 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.
- Employment Legislation
 - *Employment Relations Act 2000*
Contains recordkeeping requirements for redundancy of employment records (s69). Wages and time records for any period in the preceding six years must be available for the employee (s130). There is also a requirement to retain records of any strikes and lockouts (s98)
 - *Health and Safety in Employment Act 1992*
Requires employers to maintain a register of accidents and serious harm. No retention period is given.



- 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. The Act should not be confused with the Commerce Act 1986 in which no major provisions are found though a requirement to register applications is implied.

- 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.

- 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.



- 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*
This act covers the University as an entity and provides for recordkeeping requirements of specific regulatory documents.
- Medical Legislation
 - *Health Act 1956 and amendments*
This act addresses the legal implications and requirements for the use and transfer of patient records.
 - *Health (Retention of Health Information) Regulations 1996*
This act 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*
The 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*
This act address 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*
This GDA provides best practice for the retention and disposal of patient records.
- Other Legislation
 - *Electronic Transactions Act 2002*
This act addresses the legal implication and requirements for the use of electronic information and media.
 - *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*
This act 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, Information and Documentation – Records Management, Geneva, 2001
Judith Ellis, (ed.), Keeping Archives, 2nd ed., Port Melbourne, 1993

Archives New Zealand, Continuum Resource Kit

Records Management Standard for the New Zealand Public Sector, 2014
S5: Digital Recordkeeping Standard, 2010
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
G20: Guide to Managing Web Records, 2009
Medical Council of New Zealand – Maintenance and Retention of patient records

Related procedures / documents:

OneMassey Collaboration Site Guidelines
Business Classification Scheme
Disposal Procedure
General Disposal Authority for New Zealand Universities
Hard Copy Records Guideline
Offsite Storage Procedure
Research Protocols in force from time to time or as agreed with data providers

Document management control:

Prepared by: University Records Manager
Owned by: Assistant Vice-Chancellor People and Organisational Development
Approved by: Council C15/89 – October: 4.3.2
Date issued: 7 March 2007
Last review: August 2015
Next review: August 2017