

RECORDS MANAGEMENT HANDBOOK

CONTENTS

PART A: Introduction to University Records Management

| | |
|----------------------------------------------------------------------------|---|
| 1. Good Records and University Goals..... | 2 |
| 2. The importance of good records management..... | 2 |
| 3. What is a “record”?..... | 2 |
| 4. External drivers - legislation and standards in records management..... | 3 |
| 5. Responsibilities for records management..... | 4 |
| 6. The University's policy on records management..... | 5 |

PART B: Life Cycle of Records

| | |
|-------------------------------------------|----|
| 7. Creating records..... | 7 |
| 8. Capturing records..... | 8 |
| 9. Ensuring records are reliable..... | 9 |
| 10. Ensuring records are locatable..... | 10 |
| 11. Managing access to records..... | 11 |
| 12. Storage and retention of records..... | 13 |
| 13. Disposal of records..... | 15 |
| 14. Archiving of records..... | 17 |

PART C: Your Responsibilities

| | |
|-------------------------------------------|----|
| 15. Good Record keeping practices..... | 18 |
| 16. Records Management for Managers..... | 18 |
| 17. Records Management for all staff..... | 18 |

PART D: Resources

| | |
|----------------------------------------------|----|
| 18. Assistance, Training and Guidelines..... | 20 |
|----------------------------------------------|----|

INTRODUCTION

1. Records Management and University Goals

There are many reasons why keeping good records helps the University achieve its goals.

As a publicly funded institution operating in a heavily regulated and highly competitive environment, the University as an institution is expected to be compliant and accountable to an increasing number of external agencies and bodies, and to the public community it serves. Achieving "institutional" accountability is a challenge, because the University is a highly decentralised organisation, in which many autonomous individuals and departments carry out the core functions of the institution.

This means that the University relies on its people to collect and maintain evidence of their activity - for instance, by documenting management decisions that people might make or participate in on behalf of the University, as well as the kinds of records you would ordinarily capture in the course of your academic, research or administrative roles - and capturing such records within the University's system to maintain our institutional memory.

The University as an institution cannot meet its accountability standards without the active assistance of all its personnel. And maintaining our institutional accountability is essential if the University environment we all enjoy is to be preserved.

Remember, this is not about individual accountability or doing extra work: it is about the University's institutional accountability, and doing what is required to uphold that. What is most important is that records be accurate, reliable and locatable: both for you, and for others in the future.

There are two kinds of record keepers:

1. The first has a system for managing their records - it may not be identical to anyone else's system, but it is organised and appropriate to their own style and needs. They make the capture of records into their University files a part of their everyday routine - either on their own or with the help of a support person - so that they hardly even notice they are doing it. Their records are captured consistently and with little effort. When something comes up that requires them to put their hands on evidence of a previous action, they can locate it with minimum inconvenience.
2. The second kind believes it is "too hard" to think about records on a day-to-day basis. They pile documents up in their office, with no order or organisation to them. If they do ever organise their records, they do so on an ad hoc, mass-capture basis that takes a lot of time and effort, and leads to sloppy and inconsistent capture of their work. If an issue comes up that requires them to find old records, they go through a massive effort to locate and capture their records - and in many cases cannot find them, putting themselves and the University at risk.

2. The Importance of Good Records Management

The creation and proper management of records is central to the success of the University's diverse array of activities. And the University's contributions to research, education and society as a whole are worth preserving.

As a centre for knowledge, discovery and education, and as a publicly funded institution, it is critical for the University to maintain a reliable "institutional memory", which serves as evidence of its activity, and as a meaningful collation of its education and research outcomes – and of its contributions to academia and the wider community.

It is essential to the successful conduct of our complex business that we create and retain a complete and accurate record of what we do – intellectually, commercially, and administratively. It is easy to think that this means keeping records of our employment relationships, financial transactions or contracts; but the

“institutional memory” or central records repository should also include academic and research “records”, and documents that explain the reasoning behind management style decisions across the University.

3. What is a “record”?

In everyday language, a "record" is an account of something, a collection of information, a compilation of facts; something that is written or otherwise set down in a way that preserves its content. A record is anything that provides tangible evidence of information or past events. The record might be an email, letter, lab book, diagram, photograph, set of lecture handouts, payment receipt - or anything else tangible (or reproducible) that shows what the University does, has done, or will be doing.

A “record” comprises. . .

Recorded information in any form (regardless of format) that is:

- Created or received by the University in the course of transacting its business or carrying out its activities; and
- Retained as evidence of that activity or business.

Under the Australian Standard on Records Management (ISO 15489) - a standard the University aspires to - the term "record" refers to "documents created, received and maintained as evidence and information by an organisation or person, in pursuance of legal obligations or in the transaction of business". For the University, both of these drivers (legal obligations and the transaction of business) matter. We have legal obligations under the *State Records Act 1997* as well as the *Australian Code for the Responsible Conduct of Research* to retain and manage records in a particular way, and it is essential to the successful conduct of our complex business that we create and retain a complete and accurate record of what we do.

4. External drivers - legislations and standards in records management

The University has a range of legal obligations and other external drivers that require us to keep and manage records in certain ways. Our legal obligations arise from several sources - including legislation, mandated standards and contracts. Some of the major obligations, which are relevant to all University employees, are discussed below.

State Records Act

This law applies to the University, as well as State government agencies. It requires us to preserve and maintain "official records" - which means any record created or received in the course of carrying out the University's operations or business.

It is important to realise that this law applies not only to employees of the University, but to anyone else who creates or receives documents on behalf of the University (such as titleholders, contractors, agents and ARI Pty Ltd). Such documents should also be incorporated into the University's official records system.

Resource:

State Records Act legislative summary
www.adelaide.edu.au/legalandrisk/resources/

Adequate Records Management Standard

Related to the State Records Act, the University also must comply with the *Adequate Records Management Standard*. This Standard is mandatory, sets out more detailed guidance for managing records, and forms the primary basis upon which the University would be audited for compliance with the legislation.

Freedom of Information Act 1991 (SA)

This law gives members of the public a right to access our records with some exceptions, such as where records contain personal or confidential information. This right means that the University is required to produce documents that are requested under Freedom of Information (FOI), within a very limited time frame and in line with certain procedures.

For the University to meet its FOI obligations, it is essential that all relevant areas of the University cooperate in identifying and producing all documents that are possibly relevant to an application - including "documents" stored electronically, such as emails.



ALERT:

University Policy
Requirements

The coordination of FOI applications on behalf of the University is also essential, and occurs through an accredited FOI Officer located in University Archives & Recordkeeping.

Resources:

Freedom of Information Policy
www.adelaide.edu.au/policies/3/

Freedom of Information
legislative summary
www.adelaide.edu.au/legalandrisk/resources/

University FOI Officer
sue.coppin@adelaide.edu.au

Australian Code for the Responsible Conduct of Research

Commonly called the "Research Code", this includes specific requirements for the recording and retention of research materials, data and records. Although research materials may be anything from a tissue sample to a complex computer algorithm, research "data" and "records" are tangible University records that must be maintained not only in accordance with the Research Code but also with other records laws, like the State Records Act.

Compliance with the Research Code is now required as a condition of ARC and NHMRC research funding - and it is just good research practice to have a tangible evidence trail supporting your findings and tracing your lines of inquiry.

Resource:

Responsible Conduct of Research Policy
www.adelaide.edu.au/policies/96/

Other External Drivers

Apart from legal requirements to keep certain records, the University is also expected to retain complete and transparent records in order to maintain accountability and answer scrutiny from a range of external sources.

These are just some of the people or bodies we answer to:

- State Records SA
- the Auditor General
- the Federal and State Education departments
- the Australia Research Council (ARC)
- the National Health and Medical Research Council (NHMRC)
- other funding bodies
- industry partners
- individual members of the public (who are entitled to access our records under Freedom of Information)

In short, records management is not only about complying with recordkeeping standards and legislation: it is also about ensuring we have tangible evidence to meet all our other obligations and demonstrate accountability to our funders, collaborators and overseers.

5. Responsibilities for records management

The creation and proper management of records is central to the success of the University's diverse array of activities. The University's contributions to research, education and society represent a significant contribution to the nation's history.

As a centre for knowledge, discovery and education, and as a publicly funded institution, it is critical for the University to maintain a reliable "institutional memory", which serves as evidence of its activity, and as a meaningful collation of its education and research outcomes - and of its contributions to academia and the wider community.

It is essential to the successful conduct of our complex business that we create and retain a complete and accurate record of what we do - intellectually, commercially, and administratively.

It is easy to think that this means keeping records of our employment relationships, financial transactions or contracts; but the "institutional memory" or central records repository should also include academic and research records, and documents that explain the reasoning behind management style decisions across the University.

6. The University's Policy on Records Management

The University's Records Management Policy articulates the responsibilities of every University staff member, titleholder, adjunct and affiliate who create or receive records on behalf of the University or in the course of their University role or affiliation.



ALERT:

University Policy
Requirements

All staff, titleholders, adjuncts and affiliates should read the short Policy and be familiar with its contents.

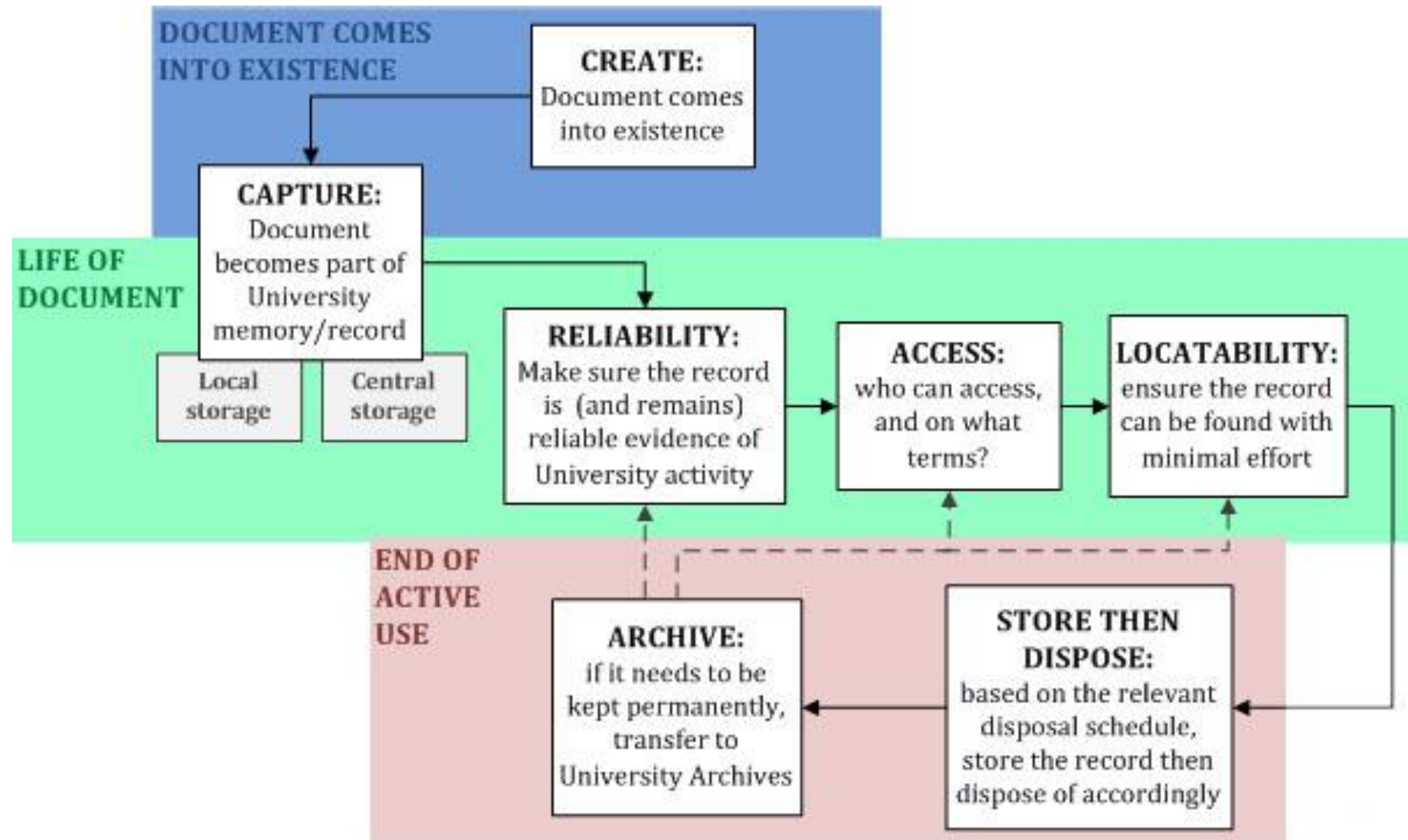
Any questions about the Policy should be directed to the University Records Management Office.

Resources:

University Records Management Policy
www.adelaide.edu.au/policies/606/

University Archives and Recordkeeping
Level 4, Barr Smith Library North
8303 5334

B: LIFE CYCLE OF RECORDS



7. Creating records

When and why things should be documented

Knowing when and why records should be created is the first step to good records management.

One major reason for creating records is that they provide proof that certain actions or events occurred, and can be used to meet accountability standards and legal requirements. But ensuring transparency and withstanding outside scrutiny is not the only reason why records should be created: records also shed light on the University's past actions, and act as an information source to guide future similar actions within the University. For an organisation with a perpetual mission, the ability to learn from our past through an "institutional memory" is critical.

If it's important, write it down!

Information is of no enduring use to anyone (including yourself) if it only exists in your head.

As a general guide, you should create a written record whenever you do any of the following in connection with the University:

- When you are making a decision or exercising a University responsibility - it is important to document the fact of your decision and the reasoning behind it; the more significant or weighty the decision, the more thoroughly you should document the reasoning.
- When you are doing something that is important or needs to be accountable - for instance, transactions, contracts, meeting discussions, and things monitored by regulatory agencies.
- When you are taking action that you might need to provide evidence of in the future - for instance, an action that someone might complain about or challenge.
- When you are doing something that you think might be useful for you or others to refer back to in the future - such as something that the University is likely to do again.
- As a researcher or teacher, any time you would ordinarily capture something for your own academic purposes - such as keeping data to substantiate research, recording student grades, or retaining lecture notes for future classes.

How should records be created?

The act of creating a record does not have to be onerous - it does not necessarily mean creating a formal or complex document. What type of "record" is appropriate to each circumstance will be a matter of common sense and judgment. For instance, if you simply want to record the fact that you had a particular conversation on a particular day, then a notation in your work diary may be sufficient; whereas if you are negotiating with another university to undertake a joint research project, then a more formal document trail and legal agreements may be required.

Whenever you document something, or write something down either electronically or in hardcopy, you create a "record" of that event. The record may be quite informal - a brief email, a note in your diary or a comment on a piece of scrap paper - but it is nevertheless a "record". It is important to remember this, as even when creating informal records you should ask yourself whether it needs to be captured in a University file. (see [Capturing Records](#)).

The time-frame is important

Things should be documented as they are happening, or as soon as possible after the event, while it is still fresh in your memory.

Creating records that reflect our core functions

It is important to remember that management, financial and administrative activities are only one aspect of the University's function: our core functions are education and research. Accordingly, it is crucial that we create records that encapsulate our academic activities. Fortunately, academic staff members are already accomplished "record keepers": through their academic training and experience, they are naturally skilled in keeping records of what they do.

They create a "record" of their academic activity every time they keep track of articles or books they read, create an evidence trail for any research they undertake, or capture their lecture and assessment materials from year to year for use when they next teach the same course. "Record keeping" is a natural and inherent part of the academic profession.

Once a record is created, the next crucial step is capturing that record, where appropriate, as a "University record". Our institutional records should reflect the University's activities: academic, administrative, financial and managerial. (see [Capturing Records](#)).

8. Capturing records

When documents need to be captured as a "University" record

Having created a record, it is important to capture that record in a way that can be found and used in the future. Similarly, when you receive some document on behalf of the University, such as a letter, email or report, it should also be captured.

On the academic side, records tend to be created as a matter of course for the personal reference or use of a staff member or their team. It is equally important to the University as an institution that such records be captured and preserved as part of the "institutional memory" of the University. By utilising the University's recordkeeping system, Content Manager, you ensure on a personal level that your work is preserved in a permanent, secure and well-supported environment.

Make your document a "University" Record!

When you document something that is relevant to your University role, or has some continuing value to the University, capture it as a "University" record.

As a general guide, you should capture records in all of the following situations:

- When you create any record in the course of your University role that could be relevant again in the future, either to you or someone else - including records that would help replicate or re-establish the operations of your area.
- When legal or regulatory requirements demand you keep records.
- When you document the steps behind a decision, exercise of responsibility or transaction.
- When a record has been received from or sent outside the University.
- When you document a change to policy, procedure or operational methodology.

Records capture should be a routine part of each person's University role, and integrated into standard operations and business processes at every level of the institution. The failure to capture records in official systems leads to personal stores of records that often remain uncontrolled and inaccessible to others who may need them - which is particularly problematic in a decentralised and autonomous University environment.

What needs to be captured?

Just as common sense applies when working out what level of formality or detail should be used in creating a record, common sense applies when assessing what needs to be captured in the University's record keeping system. In short, the University has an obligation to capture any documents that contain information or evidence of enduring value: anything that shows or explains what we do as an institution. If you create or receive any document that contains information of continuing value to the University, you must retain and capture it as a "University record". State Records endorses Normal Administrative Practice (NAP) which provides for routine destruction of drafts, duplicates and publications that contain no information of continuing value to the University.

Given our strict record-keeping requirements under the State Records Act, it can sometimes be more helpful to think about what doesn't need to be captured under NAP guidelines.

For instance:

- **Drafts:** You generally don't need to keep every draft or old version of a document, unless the older versions actually inform the decision making process - such as drafts that were distributed to co-workers for comment and came back with remarks that helped guide your decision. You should also retain drafts of contracts and other legal documents, which can provide important evidence of your negotiation process. Content Manager can manage revisions for you.
- **Unimportant/routine administrative documents:** You don't need to keep every shred of day-to-day administrative documentation that has only short term relevance - such as phone messages, rough notes or calculations that lead to more final documents. Again, common sense should prevail: if you get a phone message from someone who is engaged in a dispute with the University, it may be a smart idea to keep the message as possible evidence in the dispute; but if a phone message is routine, it is unnecessary.
- **Copies and published documents:** You don't need to keep duplicate copies of material, or published materials unless they form an integral part of your file.

Use Content Manager to make records capture easy

If you give your files and/or important documents a presence in Content Manager, they are easily traceable, and will be archived or disposed of once you are finished with them. Each document registered in Content Manager has associated metadata which acts as a tag for later searches.

Content Manager has the ability to associate metadata with your documents. Such information acts as a tag for later searches, by you or someone else.

This metadata can include a name and description for the document, its author, the document type, when it was created, and other information that helps contextualise the document. This information can help greatly in locating the record later - for instance, if the only identifying feature you can remember about a certain document is the fact that it was a letter that you received from a professor in China, that ought to be enough to find the document through a search if the document has been well described (or "tagged") in the system.

Resources:

For more information:
Refer to the website:

<http://www.adelaide.edu.au/records/services/>

Speak with someone in University
Archives and Recordkeeping
Level 4, Barr Smith Library North

9. Ensuring records are reliable

Keeping documents as evidence of events or for future reference is useless unless the documents are a reliable representation of what actually happened.

In terms of transparency, it would greatly damage the University's accountability and reputation in the eyes of its funding bodies and the public if it were discovered that a document trail had been tampered with. It is unsurprising then that under the State Records Act, the University is forbidden from altering or interfering with records once they've been created and captured - and is only allowed to destroy records in accordance with specific disposal rules and schedules.

This means if you discover a problem with a document you have already "finalised" and captured as a University record, you should never simply change or destroy it. Instead, you should create a new document related to the previous document, and if appropriate, add a note explaining why the old version should not be used, and store these together with the old (incorrect) version on your file. In Content Manager, you can use revisions to keep track of changes and finalise the last revision.

Don't mess with a record once it's been created

Documents should be a true and accurate picture of what happened, and they shouldn't be interfered with at a later date.

As a general guide, the following techniques will help you ensure reliability of your records:

- Use revisions to trace the development of a document.
- Save final, signed documents as "Finalised" in Content Manager or in PDF format so that they cannot be edited - and so that it is clear later on which version was ultimately distributed.
- Once a document has been finalised in Content Manager it cannot be changed. By routinely applying such techniques, you will help ensure that any record you create or receive is (and remains) reliable evidence of University activity.

10. Ensuring records are locatable

Being able to locate records is just as important as ensuring that documents are an accurate and reliable portrayal of the University's activities. There are various reasons why you might need to locate records in the future: it may be requested under freedom of information or through a warrant or subpoena, it may be needed to meet reporting requirements internally or externally, or you or someone else may simply want to learn from a past situation or action.

Every local unit (and every individual) across the University has different needs and a different approach when it comes to file keeping. The most crucial feature of a good filing system is that it enables you (and others) to locate records with minimal effort. If you store your documents (or at least track the whereabouts of your files) in Content Manager, their locatability is guaranteed - in a matter of seconds you can search for the document, and either view an electronic copy if it is available in the system, or determine where the relevant file is physically located.

If you are not currently storing your records in Content Manager, then you should make sure you have a system in place for keeping track of your documents that is compliant, consistent and workable. This system must be known and accessible to staff in your area.

Remember that others may need access to your record

When filing a record, consider whether others will be able to find it in the future. Stay on top of your filing – make it part of your everyday routine so that it never becomes a burden

Managing records in a mobile and portable work environment

For many of us, work is no longer just somewhere we go, but something we do wherever we are. Within the higher education sector, it is common to work flexibly, across multiple locations and at different times - and the ability to work in this way is increasingly important for both productivity and work-life balance. This means that University records often end up being used remotely - whether on a laptop or home computer, from a portable storage device, or in hard copy form transported from the University to another location (such as home, a conference or a second workplace).

The reality of a portable work environment heightens the need for a good awareness of records management, and requires extra attention to be paid to the capture, locatability and security of records. Some examples of specific steps that you should take when working remotely are as follows:

- When you create either electronic or hardcopy records away from the office that are "University records", make sure you still capture them into your University filing system (for instance, next time you're back on site).
- Take the necessary precautions to ensure security of the records, and be sure to report the loss or unauthorised access of a document - to your Head of School or Branch (who should be made aware if departmental records have been compromised), to the ITS Helpdesk for electronic information breaches (refer to IT Security Procedures), and to the Legal and Risk Branch (who must be informed for insurance purposes, and who may be able to provide assistance dealing with the situation).

Manage your records properly!

Although the need for portability of records is a reality that is recognised by the University, it is crucial that you take extra steps to ensure the proper management of any records being used remotely.

- Never remove the only copy of an important document from the University - for hard copy documents, it is better to leave the original on campus and take a copy to work from.
- Keep regular backups of electronic documents on the University system, especially documents you are working on in multiple locations.
- Use password protection or a locked briefcase to prevent unauthorised access to documents that are being used off-site.
- To ensure that emails are preserved on the University system, either use webmail when working remotely or configure your remote email applications so that you never download your University email remotely without also leaving a copy on the University server.

All these concerns can be addressed more seamlessly if you are proactive and make recordkeeping a part of your day-to-day routine. Make other members of your work team (such as any administrative support staff) aware of your portable work practices.

11. Managing access to records

The Basics

As an educator, employer, government and industry partner, research hub, and repository of knowledge, the University handles a huge amount of information - some of which may be of a personal, confidential, commercial, legally privileged, classified or sensitive nature. There will therefore be times where it is appropriate to restrict access to particular records or information. However, the University must take great care to restrict access only where there is a good reason - and to carefully balance restrictions on access with the University's public accountability and its academic mission as a disseminator of knowledge.

Consider who needs access to your documents

Managing who gets access and on what terms is just as important as capturing documents in the first place **but** the University should only restrict access to its records where there is a good reason to do so.

Keeping the following basic principles in mind will help you manage access to your records in the most balanced and appropriate way:

- Only restrict access where there is a good reason - such as privacy, commercial confidence, legal privilege or intellectual property protection - and only restrict those portions of a file or document that truly need to be restricted.
- Only restrict access for as long as the restriction is properly required.
- If something is confidential, make sure the file or document says so and explains why in a way that other University personnel looking at the file or document would understand.
- Make sure that you fully understand the rules surrounding privacy, especially if you work with student or staff records.
- Throughout the life of a file or document, keep asking yourself if it still needs to have its access restricted.
- Use electronic records where possible, to improve locatability and the proper management of access.
- Remember that if access is sought to any University records by someone from outside through Freedom of Information, the request must be escalated promptly to the University's FOI officer who will assist you in processing the application within the strict time limits prescribed by the law.
- If access is sought by a warrant/subpoena, you should deal with the request promptly, as the request may have time limitations that are legally binding. For areas where you have clear procedures for dealing with such requests (such as student records), follow those procedures carefully and do not be afraid to ask for help if you are unsure what to do. For areas that have no such internal procedures, you should seek assistance from Legal & Risk Branch.
- If you are in doubt whether access should be granted to a particular document or file - check with your Head of School or Branch manager or refer the question to Archives & Recordkeeping.

Privacy, confidentiality and other limits on access

It is best practice not to restrict records in order to facilitate sharing of corporate knowledge. However, in some instances there is a demonstrated need to restrict records including:

- **Personal information** - Many of the records held by the University contain personal information. Any information or opinion from which the identity of an individual can be ascertained is considered to be "personal information". This includes a person's name, address, date of birth, student/staff identification number, and other personal characteristics. The University has a responsibility to collect, manage, use and disclose personal information in accordance with the prevailing community standards of best practice, respecting the privacy of the individual.

Everyone handling University records needs to be familiar with and follow these standards, as encapsulated in the Privacy Policy and Management Plan - this will be particularly important if you work with student records or personnel files, which contain predominantly personal information.

- **Financial information** - such as tax file numbers, bank account or credit card details. These are a form of personal information, but are also generally subject to specific confidentiality requirements under financial regulations. For more information, consult with Financial Services or someone in the Legal & Risk Branch.
- **Health related information** - such as counselling notes or medical information. In addition to being a form of sensitive, personal information, they are subject to additional regulatory and professional confidentiality requirements.
- **Student related information** - including grades, progress and enrolment details of current, past and prospective students (including those who are offered a place but ultimately do not attend the University).
- **Legally privileged documents** - this would include communications between you and legal representatives (including the Legal and Risk Branch of the University) or advice you receive from your legal representatives. For information, ask the Legal & Risk Branch.
- **Information requiring confidentiality to ensure intellectual property right protection** - such as patentable information which is in the course of being protected. For more information, contact Adelaide Research and Innovation, Pty Ltd (ARI).
- **Commercially sensitive information** - such as information provided by an industry sponsor in the course of a specific research project, disclosed on the basis of "commercial in confidence". Commonly this material would be protected by way of a confidentiality agreement (or confidentiality clauses in the research funding contract).
- **Confidential by way of agreement** - if the University has agreed to keep something confidential under a contract, then it must comply with that agreement. If you are agreeing to keep something confidential, you should run the terms by a legal advisor, such as someone in Legal and Risk Branch. Note that if the terms of a contract itself are intended to be kept confidential, then a special process must be followed before the contract is signed, otherwise the document will not be protected from access under Freedom of Information. For more details, see the University's Freedom of Information Policy.



ALERT:
University Policy
Requirements

Resources:

Privacy Policy & Management Plan
www.adelaide.edu.au/policies/62/

Privacy Act legislative summary
www.adelaide.edu.au/legalandrisk/resources/

Maintaining adequate security around records

When records have restrictions on their access, it becomes particularly important to store them in a secure manner. Content Manager provides strict control of access to records. Security of records in Content Manager is managed by the use of Security Groups and Access Controls.

Refer to the section on Managing records in a mobile and portable work environment for hints on ensuring security where records are being portably used.

If a restricted or confidential document is subject to unauthorised access, unintentional disclosure, or has its security breached in any other way (including through loss or misplacement of the document), you should notify:

- Your Head of School or Branch, who should be made aware if departmental records have been compromised;
- The Technology Services Helpdesk for any electronic information breaches or compromising of the University's IT system - refer to IT Security Procedures for more information.
- The Legal and Risk Branch, who must be informed for insurance purposes, and who may be able to provide assistance dealing with the situation.

Keep your documents secure!

Records need to be protected from unauthorised access and should not be left unattended or in vulnerable locations.

Freedom of Information (FOI)

The Freedom of Information Act is a state law that gives members of the public a right to access our records - with some exceptions, such as where records contain personal or confidential information, or are subject to some other reasonable limitation (such as being legally privileged, or commercially sensitive).

This public right means that the University is required to produce documents that are requested under Freedom of Information (FOI), within a very limited time frame and in line with certain procedures. These requirements are summarised in the University's Freedom of Information Policy.

Resources:

For additional information about the FOI Act, refer to the Freedom of Information legislative summary www.adelaide.edu.au/legalandrisk/resources/

For the University to meet its FOI obligations, the coordination of FOI applications on behalf of the University is essential, and occurs through a designated FOI Officer located in University Archives & Recordkeeping. It is also essential that all relevant areas of the University cooperate in identifying and producing all documents that are possibly relevant to an application, including "documents" stored electronically, such as emails.

If you or someone in your area receives an FOI request, contact the University's FOI Officer immediately. They will coordinate the University's response, and help you determine which documents (if any) may be subject to exemptions from disclosure under the legislation.

12. Storage and retention of records

What kind of Storage is appropriate?

It is important to keep records in conditions that ensure they are protected, secure and accessible for as long as they are required to meet the business requirements and legal obligations of the University. These physical storage requirements will vary depending on:

Physical characteristics

Records will be in a variety of formats or media, which will require specific protective packaging and environmental conditions.

Sensitivity and security

All records need to be protected from unauthorised access and should not be left unattended or in vulnerable locations. Records which have additional sensitivity include, but are not limited to:

- Personal information about staff or students.

Look after your records!

Keep records for as long as the law and commonsense requires, and store them in a safe place where they will be preserved in good condition and can be located with minimum effort.

- Student or staff grievances.
- Information that is either commercial in confidence or legal in confidence.

Expected access rate

Records that are consulted frequently should be kept within working office areas. After active use files are closed and sent to the University's secondary storage facility for temporary or permanent storage. For further advice contact the University Archivist on 8303 5184.

Retention period

Records disposal schedules should be used to help prioritise record storage. For example:

- If records are only needed for a short time (less than 2 years) it may not be cost-effective to transfer them offsite.
- Records identified for permanent retention will require the highest standards of care from the time they are created, to ensure their longevity. When permanent records are no longer used for administrative purposes, they should be transferred to the University Archives where they will be stored.
- For assistance in evaluating your records storage options, you can speak with your School or Branch administrative personnel, as well as consulting with University Archives & Recordkeeping.

Storage principles & techniques

Regardless of whether records are hardcopy or electronic, the following are recommended to ensure effective storage:

- Store records in a way that will protect them from unauthorised access or disclosure, especially records that are sensitive.
- Records that originate in a digital form should remain digital. For example MS Office documents should be saved into an Electronic Document and Records Management System (EDRMS). Content Manager is the University's EDRMS. Not printing digital records assists the University to meet its strategic goal to reduce paper use.
- Hardcopy files that are registered in Content Manager can be returned to Records Services when they are no longer required by you.
- Use common sense when working out what records to store in your working areas, versus more remote storage. If hardcopy records need to be consulted frequently, keep them within your office space. Files registered in Content Manager can be returned to Records Services when they are no longer required by you.
- Use the records disposal schedules to help prioritise records for storage. For instance, if records are only required to be stored for a short period of time (such as less than 2 years) then it may be more efficient to keep them on site until they can be destroyed. By contrast, records identified for permanent retention will require the highest standards of care to ensure their longevity.
- Standard email programs and shared network drives do not provide recordkeeping functionality such as full record metadata, access and security. Therefore these are not suitable to meet the University's obligations under the State Records Act.

Vital records should be stored in Content Manager

Hard drives and personal email folders are not accessible to other staff and records can be lost when staff members leave the University.

Long-term storage

Permanent records are managed by the University Archives.

When permanent records are no longer required for active use, they should be transferred to the University Archives. Please contact the Collection Archivist for an assessment of your records.

Environmental Storage Guidelines

The following table provides basic guidelines for the storage of records for up to 30 years. For more detailed advice about storage requirements for specific items, contact the University Archives.

Recommended Conditions for Storage of Records

| Format | Environmental Conditions | Storage Conditions |
|----------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Paper Files Volumes Cards | <ul style="list-style-type: none"> • Temperature not exceeding 27°C • Relative humidity not exceeding 60% • Well ventilated • Ambient light | <ul style="list-style-type: none"> • Clean file covers, folders or envelopes • Robust, clean containers (eg. "Type 1" archive boxes) • Coated metal shelving |
| Paper Maps Plans Charts | <ul style="list-style-type: none"> • Temperature not exceeding 27°C • Relative humidity not exceeding 60% • Well ventilated • Ambient light | <ul style="list-style-type: none"> • Robust, clean containers • Coated metal shelving • Rolled or vertical storage is acceptable |
| Photographs | <ul style="list-style-type: none"> • Temperature 20°C +/- 2° • Relative humidity 50% +/- 5% • Well ventilated • Ambient light | <ul style="list-style-type: none"> • Clean folders or enclosures • Robust, clean containers • Coated metal shelving |
| Magnetic Media Computer discs Video tapes Audio tapes | <ul style="list-style-type: none"> • Temperature 20°C +/- 2° • Relative humidity 50% +/- 5% • Well ventilated • Ambient light | <ul style="list-style-type: none"> • Non-magnetised sealed containers • Non-magnetised shelving |
| Optical Media Compact discs Laser discs DVDs | <ul style="list-style-type: none"> • Temperature 20°C +/- 2° • Relative humidity 50% +/- 5% • Well ventilated • Ambient light | <ul style="list-style-type: none"> • Robust, clean containers • Coated metal shelving |

Ref: National Archives of Australia Storage Standard, 2002

13. Disposal of records

The State Records Act requires the University to dispose of its official records in accordance with approved [Disposal Schedules](#), which set out the legally mandated retention periods and disposal actions for the various kinds of University records. All records have a legal minimum retention period and this is governed by the State Records Act 1997 and by the use of General Disposal Schedules.

It is crucial that we keep records for as long as the law and commonsense require, so that we can provide evidence of our decisions and activities after they have occurred - and it is equally important that we have practices in place to ensure destruction of records after that time, in order to make the best use of our finite storage capacity.

Some documents should be kept permanently by the University, either due to requirements of the disposal schedules or due to the fact that the records have an enduring value to the University. Records to be permanently retained are managed and stored by the [University Archives](#).

To ensure that University records held by administrative and academic departments are properly disposed of, approval must be obtained from the University Archives prior to any disposal actions. This provides a consistent check that the University is complying with its retention obligations.

Use Content Manager to help you

If you register the existence of records in Content Manager, then disposal and archiving will occur automatically.

The process involved in disposing of records varies depending on whether you have previously captured your records into the University's recordkeeping system, Content Manager:

- If your records **HAVE** previously been captured into Content Manager, then disposal will happen automatically. Records Services will consult with business owners of records before any disposal occurs. This is one of the many good reasons to capture your records into Content Manager as early in their life as possible, as a routine part of your work practice - and while the records are fresh in your mind and easy to describe.
- If your documents are under local departmental custody and **HAVE NOT** been captured in Content Manager, then you should contact the University Archives for a disposal authorisation request prior to destruction. . This form will be returned with instructions on the appropriate disposal action.

Normal Administrative Practice (NAP)

NAP is the concept that material can be destroyed according to 'normal administrative practices'. This provides for the routine destruction of drafts, duplicates and publications, with the test that it is obvious that no information of continuing value to the organisation will be destroyed.

NAP falls into six main groups:

- transitory or short term items, e.g. phone messages, notes, compliment slips or office notices
- rough working papers and/or calculations created in the preparation of official records
- duplicate copies of material retained for reference purposes only
- drafts not intended for further use or reference, **excluding** official version drafts of agreements, submissions and legal documents
- published material which does not form an integral part of an agency record
- system printouts used to verify or monitor data, or answer ad hoc queries, that are not part of regular reporting procedures and not required for ongoing use.

What is NAP material?

Material that can be disposed of under NAP comprises items of an ephemeral or transitory nature created, acquired or collected by agency officers in the course of their official duties. Such material has no ongoing value and is not usually incorporated into the agency recordkeeping system.

NAP in electronic media

Just as telephone conversations or other verbal communications that contain information of ongoing value should be documented, so voice mail, e-mail, facsimiles, word-processed documents, spreadsheets, etc. should be captured into corporate recordkeeping systems when they contain information of ongoing value.

Agency induction and procedures must ensure that all officers are aware of their recordkeeping responsibilities and that electronic records with ongoing value are captured and retained in an appropriate way. Only data included in the six categories outlined under NAP may be deleted from electronic systems according to normal administrative practice.

The NAP test

Where the information is not duplicated in the agency recordkeeping system, ask:

- does the material form part of an agency transaction?
- does it add value to an existing record?
- does it show how a transaction was dealt with?
- does it show how a decision was made?
- does it show when or where an event happened?
- does it indicate who was involved or what advice was given?
- is it a formal draft of a Cabinet submission, an agreement or a legal document?
- is the material included in a disposal class in a general disposal schedule or in an agency operational records disposal schedule?

If the answer to any of these questions above is **YES** then the material **must not** be destroyed according to NAP. Therefore, the following types of items **may** be destroyed under NAP:

- word-processing documents and spreadsheets in electronic format after updating, printing, or transfer to electronic recordkeeping systems
- drafts and rough notes not intended for further use
- brochures, catalogues, price lists, unsolicited promotional material etc. received from external sources
- superseded copies of instructions, guidelines, standards, etc., not included in a general or agency records disposal schedule
- extra copies of records no longer required for reference purposes
- copies of published items kept for personal reference
- unimportant messages and notes, eg those required for only few hours or a few days
- system printouts used to verify or monitor data, or answer ad hoc queries, that are not part of regular reporting procedures and are not required for ongoing use.

14. Archiving of records

Some of your records are tomorrow's precious archives!

The University Archives is responsible for the care and preservation of University records of enduring value and significance - records that are considered to be worthy of permanent retention. The Archives form a central component of the University's "institutional memory", dating back to 1874 and capturing information about the University, its governance, students, staff, buildings, events, clubs and societies.

Some types of records must be retained permanently by virtue of legal requirements under the State Records Act whereas some records are kept permanently because they have an enduring historical value to the University.

For example:

- Records with administrative value, such as minutes and agendas of senior committees, policies and procedures, annual reports, campus maps and other records retained to meet the continuing administrative needs of the University.
- Records with legal value, such as agreements, certificates of title, delegations of authority and other documents that must be preserved in order to protect the legal rights of the University, its staff and its students.
- Records with financial value, including high level financial statements, returns and audit reports that demonstrate the conduct of the University's financial affairs in a transparent and honest manner.
- Records with informational value (or community value), such as records that add context and texture to the history of the University, or demonstrate social, political and recreational aspects of the University community and its position within South Australia and beyond. Photographs, media releases and promotional material may fall under this category, as well as records related to any events or controversies in the University community that are historically interesting.

Resource:

The majority of the records contained in the University Archives are publicly available, and a guide of the holdings can be viewed at: <https://www.adelaide.edu.au/records/>

In addition the Barr Smith Library's Special Collections houses personal papers of members of the academic staff, graduates, benefactors and other individuals and organisations associated with the University of Adelaide. If you are not sure how and where your material should be archived, University Archives and Recordkeeping; can help you determine where your different records will be most appropriately preserved in perpetuity.

PART C: YOUR RESPONSIBILITIES

15. Good Records Keeping Practices

Good Record Keeping. . .

- Contributes to the smooth operation of the University by making information available when it is needed for decision-making and operational activities
- Provides precedent, background information and analytical material for new staff or colleagues working on similar projects
- Creates a complete record of official actions that will remain with the University for future use by others and may later be transferred to the University Archives as a historical record
- Ensures accountability
- Ensures that electronic records, especially those generated by desktop applications will be available to all authorised personnel
- Protects records from inappropriate and unauthorised access

Ideal Outcomes:

1. Records are created
2. Records are captured
3. Records are disposed of systematically
4. Access to records is managed
5. Records can be found
6. Records can be relied upon
7. The management of official records is planned
8. Records management training is provided
9. Records management reporting mechanisms are implemented
10. Policies, procedures and practices exist
11. Records management resources are implemented

16. Records Management for managers

Managers must ensure that University policy is implemented within their area of responsibility. This can be achieved by:

- Maintaining awareness of current University policies and procedures in relation to recordkeeping; privacy and Freedom of Information (FOI)
- Ensuring staff understand how the policies and procedures affect their work
- Providing staff with the relevant staff development opportunities
- Incorporating defined recordkeeping responsibilities into Position Descriptions
- Ensuring the appropriate recordkeeping system (Content Manager) is used
- Seeking expert advice when in doubt

17. Records Management for all staff (including Academics)

The State Records Act requires **all University staff** to "make and keep full and accurate records" of their business activities. This applies equally to the paper and electronic environment.

Staff have a number of basic obligations regarding records:

- Make records to support the conduct of your University activities
- Create records that may not otherwise be created. Documenting decisions and their reasons builds up a record of precedents, which can be used by other staff when making similar decisions. Resultant records will also enable explanation or justification, and responsibility for decisions, events or transactions and for actions in relation to these events or transactions. Activities that do not by themselves result in the creation of records should be documented - this includes;
 - taking of minutes

- file notes of telephone discussions, conferences or other oral decisions.
- Register records into the University's Electronic Document and Records Management System (EDRMS) - Content Manager
 - Ensure records are attached to the correct file. These provide evidence of business activity through an identifiable sequence of events.
 - Failure to capture records into Content Manager can result in records being subject to arbitrary destruction or which cannot be located when required.
 - **Do not** keep corporate records in private emails, drives etc outside of the University's EDRMS, Content Manager.
- **Do not** destroy University records without authority to do so from the Manager, University Archives and Recordkeeping.
 - Failure to maintain records for the period of time necessary to meet accountability or recordkeeping requirements can contribute to loss of accountability and the University's corporate memory.
 - Unauthorised destruction of University records can result in a \$10,000 fine or two years imprisonment. This penalty is applied to the responsible staff member.
- Protect the privacy of the personal information contained in University's records.
 - Ensure that personal information is dealt with in accordance with the University's Privacy Policy.
- Ensure that all information contained in University records is objectively expressed, correct, up to date and not misleading.
 - Members of the public, staff and students have right of access to University records which may be sought under the University's Freedom of Information Policy. When writing about an individual, assume that they will read the document.
 - University records may also be accessed by external agencies, and so should reflect the highest standards of professional behaviour by all staff.
- Ensure all student related matters are filed electronically in Content Manager in the Student's file (as mandated by General Manager, Student Services, July 2009).



ALERT:

University Policy
Requirements

RESOURCES

18. Assistance and Guidelines

For more information or assistance in managing your record keeping, contact University Archives and Recordkeeping.

Website: <http://www.adelaide.edu.au/records/>

General Enquiries: (08) 8313 5334

Records Services

Level 4, Barr Smith Library North

phone: 8313 5334

Fax: 8313 3417

Email: records.services@adelaide.edu.au

University Archives

Room Level 4, Barr Smith Library North

phone: 8313 5184

Fax: 8313 3417

Email: archives@adelaide.edu.au

Other useful links:

- Forms, Templates and 'How To' Guides:
<https://www.adelaide.edu.au/records/services/forms/>
<https://www.adelaide.edu.au/records/services/guides/>