RECORDKEEPING POLICY 2017

The General Counsel as delegate of the Senate of the University of Sydney, adopts the following policy.

Dated: 1 December 2017

Last amended: 7 June 2018 (administrative amendments only)

20 July 2023 (administrative amendments)

12 February 2024 (administrative amendments)

Signature:

Name: Mr Richard Fisher, AM

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1 Name of policy

This is the Recordkeeping Policy 2017.

2 Commencement

This policy commences on 14 December 2017.

3 Policy is binding

Except to the extent that a contrary intention is expressed, this policy binds the University, staff, students and affiliates.

4 Statement of intent

This policy:

(a) requires all activities undertaken by or on behalf of the University to be documented through the proper creation, capture, management and maintenance of University records;

(b) provides for orderly and accountable disposal of University records;

(c) facilitates appropriate access to University records, and

(d) supports the University's compliance with the requirements of the *State Records Act 1998* (NSW) ("the Act").

5 Application

(1) This policy applies to:

(a) all staff and affiliates;

(b) all activities undertaken by or on behalf of the University;

(c) all information created and received by or on behalf of the University, in any format or medium; and

(d) all software applications, including enterprise business information systems, used to create, manage and store information and records.

(2) This policy does not apply to library material or to archival or heritage material held in the collections of the University's libraries and museums.

6 Definitions

ARMS	means Archives and Records Management Services.
business	means all activities undertaken by or on behalf of the University, including teaching and learning, community service, administration, commercial and cultural activities. It includes outsourced, contracted and cloud-based activities
business owner	means, in relation to a business system, the most senior University employee responsible for its management and implementation.
business system	means an automated system that creates or manages information about the University's activities. It includes software applications whose primary purpose is to facilitate transactions between an organisational unit and its customers e.g. e-commerce systems, client relationship management systems, purpose-built or customised databases, finance or human resources systems.

disposal	has the meaning given in section 3.8 of the Australian and International Standard AS ISO 15489.1-2016, Records Management which at the date of this document is: means the range of processes associated with implementing records retention, destruction or transfer decisions, which are documented in disposal authorities or other instruments.
record	has the meaning given in section 3(1) of the *State Records Act 1988 (NSW),* which at the date of this document is: means any document or other source of information that is compiled, recorded or stored, in written form or on film, by electronic process, or in any other manner or by any other means A record may be in any format and in any medium.
recordkeeping	has the meaning given in NSW State Records Glossary of recordkeeping terms which, at the date of this document is: the making and maintaining of complete, accurate and reliable evidence of business transactions in the form of recorded information.
recordkeeping system	means a business system capable of capturing, maintaining and providing access to records over time.
senior responsible officer	means the individual with corporate responsibility for the oversight of records and information management as required by section 1.3 of the State Records *Standard No 12, Standard on records management, 2014*. At the University this is the Group Secretary.
State archive	means a State record that belongs to a class of records that the NSW State Records Authority identifies as "required as State archives." University records that are classed as State archives are also University archives.
State record	has the meaning given in section 3(1) of the *State Records Act 1988 (NSW),* which at the date of this document is: any record made and kept, or received and kept, by any person in the course of the exercise of official functions in a public office, or for any purpose of a public office, or for the use of a public office **Note**: The University is a public office and its records are State records.
unit	means any of the following: • a faculty • University school • a portfolio controlled by a Deputy Vice-Chancellor, a Vice-Principal, the General Counsel or the University Librarian • a professional service unit within the portfolio of the Vice-President (Operations) • a Level 4 centre, as defined in the *Centres Policy 2023*; and • other groups as determined by the General Counsel from time to time

University archive	means a University record that has continuing value because it is significant for administrative or historical reasons.
University record	means any record that is made or received by or on behalf of the University. All University records are also State records.

7 Recordkeeping principles

(1) The University must establish and maintain a records management program.

(2) The records management program must meet the minimum compliance requirements of State Records *Standard No 12, Standard on records management, 2014*.

(a) The components of the University's records management program are specified in clause 8 of this policy.

(3) Records and information needed to meet or support the requirements of the University must be identified as such.

(a) Business needs for information and accountability must be identified.

(b) Risks to information or systems that hold records and information must be identified and mitigated.

(4) The University's business must be appropriately recorded.

(a) Records must be made to document or facilitate the transaction of any University business activity.

(i) Records can be automatically generated by a business system or deliberately made by a person involved in the transaction.

(b) Records must be full, accurate, authentic, reliable and trustworthy.

(c) Decisions about what records need to be created to support particular business activities must be based on an evaluation of the risks involved.

(d) If a record was not an automatic or direct byproduct of business activity, the record should be made as soon as practicable after the event.

(5) Records must be captured in one of the following recordkeeping systems:

(a) the University recordkeeping system managed by ARMS;

(b) one of:

(i) an enterprise business system;

(ii) a local business system approved by the Manager, ARMS, or

(iii) a local process approved by the Manager, ARMS

which meets the requirements of the State Records Authority's standard on records management *Standard No 12, Standard on records management, 2014*;

or

(c) any other system approved by the Manager, ARMS.

(6) Records must be appropriately managed across all operating environments including diverse system environments and physical locations.

(7) Records must be maintained and managed for as long as they are needed.

(a) The University recordkeeping system must be designed to maintain and manage records for as long as needed.

(b) The University Archives must provide permanent custody for University archives and State archives.

(c) Business systems must be:

(i) designed and managed as recordkeeping systems; or

(ii) structured to transfer records to the University recordkeeping system managed by ARMS.

(d) Contractual arrangements for outsourced, cloud and similar service agreements must:

(i) require that records are maintained, secure and accessible for as long as they are required; and

(ii) specify what must happen to the records at the expiration of the agreement.

(8) Recordkeeping systems must be authorised, maintained and managed for as long as they are needed.

(a) Business owners must ensure that business systems meet the requirements of this policy, particularly those of subclause 7(6)(c).

(b) When business systems are upgraded or replaced the records they contain, together with their recordkeeping metadata, must be migrated to the upgraded or replacement system.

(9) Decommissioning of business systems must be appropriately managed.

(a) When business systems are upgraded, replaced or abandoned the business owner, or other responsible person if there is no longer a business owner, must make arrangements with ARMS for authorised disposal of the records they contain.

(10) Disposal of records must be appropriately authorised.

(a) Records must not be destroyed or otherwise disposed of without authorisation:

(i) Approval for the disposal of records must be sought from the Records Manager, as specified in the *Recordkeeping Manual*.

(ii) Records may only be destroyed in a manner approved by ARMS.

(iii) Ephemeral, duplicated and merely facilitative records may be destroyed in accordance with the normal administrative practice procedures specified in the *Recordkeeping Manual*.

(b) Records required to be retained as University archives or State archives must, when they cease being in active use, be managed in accordance with the Recordkeeping Manual.

(11) Access to records must be appropriately authorised.

(a) All staff and affiliates must have access to the records that they need for business purposes.

(b) Access to records which have restricted access requirements must be approved by the head of the unit which manages that class of record.

(c) Staff and affiliates should access records only when they have a business need to do so.

(d) Records and the information in them must be accessed, used and disclosed only in accordance with legislative requirements and University policies and procedures.

(e) ARMS will manage all applications for access to records under right to information or privacy legislation and in response to subpoenas or warrants.

(i) All staff and affiliates must comply when ARMS seeks records for these purposes.

(12) Amendment of records must be appropriately authorised and documented.

(a) Records must only be amended with proper authorisation.

(b) Details of each amendment must remain attached to the record's recordkeeping metadata.

(c) When records are amended in accordance with the *Privacy and Personal Information Act 1998 (NSW),* the *Health Records and Information Privacy Act 2002 (NSW)* or by court order, details of the amendment must remain attached to the record's recordkeeping metadata.

8 Records management program

(1) The University's records management program consists of:

(a) policy, procedures and guidelines including:

(i) this policy;

(ii) the *Recordkeeping Manual;*

(iii) guidelines and advice on the ARMS website (http://sydney.edu.au/arms/); and

(iv) local business systems approved by the Manager, ARMS for recordkeeping and information management;

(b) records management systems, including:

(i) the University recordkeeping system (Records Online http://sydney.edu.au/arms/rol/index.shtml);

(ii) enterprise business systems that function as recordkeeping systems;

(iii) local business systems approved by the Manager, ARMS that function as recordkeeping systems;

(iv) other structured local systems for managing records which meet the requirements of the *State Records Authority's Standard No 12, Standard on records management, 2014;*

(v) the University Archives;

(c) Records Management personnel including:

(i) ARMS staff;

(ii) other staff with specific responsibility for recordkeeping as part of their duties; and

(iii) any other staff or affiliates who deal with records.

(2) The University's records management program and recordkeeping systems must be monitored by ARMS.

(a) ARMS must co-operate with NSW State Records in relation to monitoring programs, practices and systems.

9 Responsibilities

(1) The Vice-Chancellor has statutory responsibility under section 10 of the Act for ensuring the University's compliance with the requirements of the Act.

(2) **The General Counsel** has portfolio responsibility for records management within the University, consistently with the *University of Sydney (Delegations of Authority) Rule 2020*

(3) **The Group Secretary** is the senior responsible officer.

(4) **The Manager, ARMS** is responsible for:

(a) managing the recordkeeping program;

(b) developing and maintaining a Recordkeeping Manual to support the recordkeeping program; and

(c) approving local recordkeeping systems.

(5) **The Records Manager** is responsible for:

(a) developing and implementing the recordkeeping program;

(b) authorising the disposal of University records;

(c) managing requests for access to University records other than under right to information or privacy legislation; and

(d) monitoring compliance with the recordkeeping program.

(6) **Heads of units** are responsible for:

(a) requiring full and accurate records of the business activities for which they are responsible to be created, captured into a recordkeeping system and managed in accordance with this policy and the *Recordkeeping Manual*;

(b) adopting and maintaining business systems that comply with this policy, particularly those of subclause 7(6)(c);

(c) requiring that proper retention and disposal processes for records are managed through system and service transitions or the decommissioning of systems.

(7) **All staff and affiliates** are responsible for:

(a) making and keeping full and accurate records of business activities in which they engage; and

(b) complying with the *Recordkeeping Manual*.

(8) **No person** may destroy, transfer out of University custody or otherwise dispose of University records without the authorisation of the Manager, ARMS.

10 Breach of policy

(1) Any staff member or affiliate who becomes aware of a breach or potential breach of this policy must report it as soon as possible to the Manager, ARMS for appropriate action.

(2) Failure to ensure that University records remain under the control of the University and in safe custody in University-provided facilities is an offence under the Act.

Note: See *State Records Act 1998* (NSW) s21

(3) Breach of this policy may, in appropriate cases, result in disciplinary action against staff members or affiliates involved.

11 Recordkeeping manual

(1) The Manager, ARMS will prepare and maintain a Recordkeeping Manual for approval by the General Counsel.

(2) The *Recordkeeping Manual*:

(a) will set out the procedures which must be followed in implementing this policy; and

(b) must be published on the University web site.

(3) The *Recordkeeping Manual* has the status of procedures under the *University of Sydney (Policies Development and Review) Rule 2011*.

12 Rescissions and replacements

This document replaces *University Recordkeeping Policy 2000*, which is rescinded as from the date of commencement of this document:

NOTES

Recordkeeping Policy 2017

Date adopted:	1 December 2017
Date commenced:	14 December 2017
Date amended:	7 June 2018 (administrative amendments)
	20 July 2023 (administrative amendments)
	12 February 2024 (administrative amendments)
Original administrator:	Manager ARMS
Current owner:	General Counsel
Review date:	1 December 2022
Rescinded documents:	University Recordkeeping Policy 2000
Related documents:	Recordkeeping Manual
	State Records Act 1998 (NSW)
	State Records Regulation 2015 (NSW)
	University of Sydney (Delegations of Authority) Rule 2020

State Records *Standard No 1, Standard on records management, 2014*

Privacy Policy 2017

Risk Management Policy 2017

AMENDMENT HISTORY

Provision	Amendment	Commencing
Related documents	Replace Privacy Policy 2013 with Privacy Policy 2017	7 June 2018
9(2); related documents	replace 'University of Sydney (Delegations of Authority – Administrative Functions) Rule 2016' with 'University of Sydney (Delegations of Authority) Rule 2020	20 July 2023
6	Updated link to NSW State Records Glossary of Recordkeeping terms	12 February 2024
6	'Centres and Collaborative Networks Policy 2017' replaced with 'Centres Policy 2023'	12 February 2024
6	Replaced 'Director, University Libraries' with 'University Librarian'	12 February 2024
6	Replaced 'Vice-Principal (Operations) with 'Vice-President (Operations)'	12 February 2024
6; 7(2); 7(5)(b)(iii)	Updated link to Standard on records management 2014	12 February 2024
7(10)(a)(i); 7(10)(a)(ii); 8(1)(a)(ii); 9(6)(a); 9(7)(b)	Updated links to Recordkeeping Manual	12 February 2024
8(1)(a)(ii); 8(1)(b)(i)	Updated links to Archives and Records Management	12 February 2024