

# **ECM Governance Policies**

# **Records Management Policy**

# **Document summary**

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Policy owner	Registrar's Office			
Approved by	Council	Reviewed	by	Council
Enquiries	Registrar's Office			

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# **Purpose**

The University must manage its official records in a manner compliant with legislation, in such a way as to best serve its operational and business requirements, preserve institutional memory, and manage risk effectively. This policy aims to govern the safe and secure storage and handling of records, ease of (authorised) access, version and quality control, adherence to retention schedules, and appropriate disposal by those authorised to do so.

### **Definitions**

Term	Definition
Record	A physical or electronic document pertaining to the University's core business, or the business of a specific administrative, support or academic department, office, group or unit, recording processes, actions, transactions, decisions, proceedings, policies or procedures, et al. Minutes of meetings. Documentary evidence of official University business, actions, transactions and policy.  ISO 15489 definition: "information created, received, and
	maintained as evidence and information by organization or person, in pursuance of legal obligations or in the transaction of business"
Official record	Physical or electronic document declared an official record; may not be manipulated or altered without approval from the record owner.
	Any derivative of or amendment to a declared record is permissible, but the original version of the record must remain unaltered, and retains its status as a declared record. Derivatives and versions may become distinct records in their own right, if it is necessary for them to be declared as such.
Record management	Involves the management of records from their identification, declaration and classification through storage, auditing and distribution, to eventual disposal by archiving or deletion/destruction
Classification	Indicates the level of access applicable to a record; the level of sensitivity associated with the information contained in a record
Disposal	Final stage in the lifecycle of a record: archiving or deletion/destruction
Imaging (Scanning)	The production of an electronic facsimile of a physical record, for Records Management purposes. For the purposes of the present policy, imaging is distinct from "scanning", as scanning typically involves the retrieval of machine-readable data from a physical document.
PAIA, 2000	Promotion of Access to Information Act, 2000
Chief Information Officer	"[T]he chief executive officer, or equivalent officer or the person who is acting as such"; must "designate such number of persons as deputy information officers as are necessary to



Term	Definition
	render the public body as accessible as reasonably possible for requesters of its records" (Promotion of Access to Information Act, 2000)
Record owner	Designated owner of a collection of records pertaining to or held by a specific PASS or academic department, office, group or unit; not necessarily the owner of the contents of the records, or of the Intellectual Property contained therein.
Record keeper	Designated keeper of records pertaining to or held by a specific PASS or academic department, office, group or unit
PASS	Professional, Administrative and Support Staff

### Applicable to

#### Types of records: including but not restricted to

- Administrative, operational and Human Resources records
- Student records (i.e. academic transcripts, degree certificates)
- Staff records (i.e. employment contracts, disciplinary proceedings)
- Scholarly content that constitutes the record of a transaction and that may be used as evidence in a court of law or for similar official purposes
- · Research, teaching and learning records
- UCT policies and procedures
- UCT-related web pages and web sites
- Physical records (i.e. paper documents, photographs, etc.)
- Audio-visual files (i.e. videos & podcasts)
- · Historical and archived records (institutional memory)
- Transactional records (i.e. financial data)

#### Storage media

- Paper filing systems
- Shared network drives
- Document management systems
- · Web content management systems
- Databases

#### **Exclusions**

· All UCT documents not declared records



#### **Policy summary**

- All official UCT records must be managed in a manner compliant with relevant legislation
- 2. All official UCT records must be subject to a retention schedule compliant with relevant legislation and/or designed to safeguard institutional memory
- 3. All official UCT records must be managed in accordance with the records management lifecycle, file plan and retention plan
- All official UCT records must be stored or archived in a safe and secure environment
- 5. Access to official university records must be logged and monitored
- 6. All official UCT records must have at least the minimum required metadata associated with them, as laid out in the Information Architecture and Metadata Policy and the UCT File Plan and Retention Schedule
- 7. Official record and disposal registers must be implemented and maintained
- 8. All official UCT records must have designated owners, accountable for a specific collection or collections of records and their metadata
- All official UCT records must have designated keepers, responsible for archiving and/or filing and classifying them appropriately once they have been identified as records
- Designated records owners/keepers are responsible for the metadata associated with their records
- 11. Duplication of official UCT records should be avoided wherever possible.
- Facsimiles made of official records may only be identified as official records where the intention of making the facsimiles is to replace the original records
- 13. Official UCT records may only be altered by a person authorised to do so
- 14. Official UCT records may only be disposed of by those specifically authorised to do so, in a manner consistent with the record classification and the relevant legislation and policy

#### **Policy details**

- All official UCT records must be managed in a manner compliant with relevant legislation
  - The University complies with the Promotion of Access to Information Act, 2000 (PAIA).
    - 1.1.1. In accordance with the PAIA records held by the University must be made available following a request to do so from an authorised body or person.
- 2. All official UCT records must be subject to a retention schedule compliant with relevant legislation and/or designed to safeguard institutional memory
- 3. All official UCT records must be managed in accordance with the records management lifecycle, file plan and retention schedule
  - 3.1. All record owners and record keepers must be trained in records management at UCT.
- All official UCT records must be stored or archived in a safe and secure environment
  - Electronic and physical records must be safeguarded from unauthorised access and manipulation.



- 4.1.1. All electronic records should have "read-only" status.
- 4.1.2. Any derivative of or version of a declared record may not alter the original version of the record.
- 4.2. Electronic and physical records must be safeguarded from accidental or wilful destruction, environmental hazards, and degradation of storage.
  - 4.2.1. Electronic repositories must be backed up off-site.
- 4.3. Physical records should be imaged and stored in an appropriate electronic repository wherever practical and affordable, with appropriate metadata appended to ensure proper indexing and retrieval, and to reduce handling of physical records.
  - 4.3.1. Imaged records must not be duplicated.
  - 4.3.2. Imaged records must be stored in a repository that meets the common standards and criteria for institution-wide Records Management, with appropriate authorised access.
  - 4.3.3. Electronic imaging and storage can serve as a back-up for fragile physical records, or can be done in order to replace them.
  - 4.3.4. It is recognised that physical facsimiles of records may be more appropriate in some cases.
- 4.4. For litigation purposes all electronic records must be retained in the original file format.
  - 4.4.1. For example: an email that serves as an official record must be stored in its original email format; a PDF copy of the email will not stand as evidence in a court of law.

#### 5. Access to official university records must be logged and monitored

- No unauthorised persons may be granted access to physical or electronic records.
  - Access to electronic records must be in accordance with their classification.
- Access to electronic records must be governed via electronic authentication and access control.
- 5.3. Physical records may not be removed from the University premises without proper authorisation and approval.
- All official UCT records must have at least the minimum required metadata associated with them, as laid out in the Information Architecture and Metadata Policy, the UCT File Plan and the UCT Records Retention Schedule
  - 6.1. See the File Plan and Information Architecture and Metadata Policy for more information.

#### 7. Official record and disposal registers must be implemented and maintained

- 7.1. Records must be registered in a compliant record registry and file plan, signed off by the Chief Information Officer, in accordance with Promotion of Access to Information Act, 2000.
- 7.2. A disposal registry must be kept of all records archived or destroyed/deleted, and included in the record register.
- 7.3. A physical records register must include a record location catalogue.
- 8. All official UCT records must have designated owners, accountable for a specific collection or collections of records and their metadata



- 8.1. This accountability must be written into the designated record owner's job description; where this does not happen accountability and responsibility must be assigned to the record owner in writing.
  - 8.1.1. Accountability for records and all it entails must also be detailed and monitored in the Personal Performance System and appraisals.
- All official UCT records must have designated keepers, responsible for archiving and/or filing and classifying them appropriately once they have been identified as records
  - 9.1. This responsibility must be written into the designated record keeper's job description; where this does not happen accountability and responsibility must be assigned to the record owner in writing.
    - 9.1.1. Responsibility for records and all it entails must also be detailed and monitored in the staff member's Personal Performance System and appraisals.
- Designated records keepers are responsible for the metadata associated with their records
  - 10.1. Records keepers must enter and maintain the required metadata for each record.
  - See the File Plan and Information Architecture and Metadata Policy for more information.
- 11. Duplication of records must be avoided wherever possible
  - 11.1. Physical documents deemed too fragile to last may be duplicated to ensure the survival of their contents.
  - 11.2. It is recognised that certain circumstances, such as the use of records as legal evidence, may require duplication.
    - 11.2.1. Duplication must be approved by the record owner.
    - 11.2.2. Once the duplicated record has served its purpose it should be destroyed, unless there is a pressing case for its continued existence.
- Facsimiles made of official records may only be identified as official records where the intention of making the facsimiles is to replace the original records
- 13. Records may only be altered by a person authorised to do so
  - 13.1. Since a record is by definition unalterable any alteration to a record results in a new record. Such an alteration may be only be undertaken by a person authorised to do so, upon the approval of an official request to that effect.
    - 13.1.1. Such a request must be logged with the owner of the record.
  - 13.2. The resulting new record should be managed as such, along with its metadata.
- 14.Official UCT records may only be disposed of by those specifically authorised to do so, in a manner consistent with the record classification and the relevant legislation and policy
  - 14.1. Disposal may only take place upon the approval of an official request to either archive or delete/destroy a record.
    - 14.1.1. Such a request must be logged with the owner of the record.
    - 14.1.2. The destruction of a record must be logged in the disposal registry (included in the record register).



# **Policy violations**

Non-adherence to official retention schedules, unauthorised access or publication of sensitive records, or policy violations leading to the loss of official records may have serious legal and reputational implications for the University. Disciplinary measures may be instituted against anyone found to be in violation of this policy.

### Roles and responsibilities

#### Roles

Department/designation	Role		
Registrar	Chief Information Officer (as designated by the Vice- Chancellor)		
	Records Management Policy owner		
Internal Audit	Monitoring of compliance with policy		
Legal Secretariat	Monitoring of legal and statutory compliance requirements		
Information and Communication Technology Services (ICTS)	Provision of information technology services and maintenance thereof		
Properties and Services	Physical access control		
Department	Facility maintenance		
University Archives	Custodianship of records stored in University Archives		
Record owner	Oversight of a collection or collections of records pertaining to or held by a specific PASS or academic department, office, group or unit		
	Ultimately accountable for the management of such a collection or collections and their retention schedules		
	Not necessarily the owner of the contents of the records		
Record keeper	Designated staff member responsible for the management of records pertaining to or held by a specific PASS or academic department, office, group or unit		

#### Responsibilities

Department/designation	Responsibility		
Registrar	Oversight of records management at UCT		
	Implementation of Records Management Policy		
	Designation and control of deputy information officers in accordance with the PAIA, 2000		
Internal Audit	Compliance reviews		



Department/designation	Responsibility
Information and	Server and system maintenance
Communication Technology Services (ICTS)	Maintenance of security and authentication for electronic record management systems
	Providing information technology assistance and guidance
	Definition of universal standardised file plan
Properties and Services Department	Control of physical access to physical record repositories
	Control of environmental hazards at physical record repositories
University Archivist	Day-to-day management of University Archives records
	Maintenance and implementation of retention schedule
Record owner	Assigning and managing record keeper
	Implementation of record management and retention schedule
	Review of retention schedule
Record keeper	Day-to-day management of the records of a specific PASS or academic department, office, group, unit or committee
	Maintenance of metadata associated with such records

### **Related links**

- Promotion of Access to Information Act, 2000
- Information Architecture and Metadata Policy



# **Appendices**

# Appendix A – UCT File Plan

Forthcoming

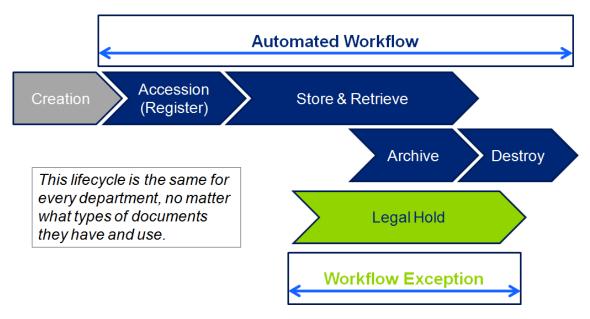
### Appendix B – UCT Records Retention Schedule

Forthcoming

### **Appendix C - Record Management Lifecycle**

- Creation:
  - Receipt
  - Identification
  - Declaration
  - Classification
- · Maintenance and use:
  - Storage/retention
  - Retrieval
    - Duplication
  - Distribution
- Legal hold (overrides disposal lifecycle)
- Disposal:
  - Archival/preservation
  - Destruction/deletion

See a visual representation of a record management lifecycle below:





# Approval and version history

Review period: Every five years

Version	Change type	Amendments	Approved by	Signed	Date
e.g. V1.1	e.g. Major/ Minor change	e.g. Minor change: Changed point 1.2.1 to reflect sign off by the Registrar instead of the Chief Information Officer	e.g. Senate and Council	e.g. Policy owner	e.g. 2011/09/10