



RECORDS MANAGEMENT POLICY

Version:	Approved by:	Approval Date:	Effective Date:	Next Review:
3	Executive Director, Commercial and Legal	04 July 2024	04 July 2024	04 July 2027
Policy Custodian:	Executive Director, Commercial and Legal		Document No:	UOWE-LGL-POL-04
Purpose:	UOW Global Enterprises (UOWGE) is required to manage records in accordance with the <i>State Records Act 1998 (NSW)</i> and the <i>Public Finance and Audit Act 1983 (NSW)</i> . This Policy outlines responsibilities and compliance controls regarding records management, with the objective of: <div><div>1.</div><div>Complying with regulatory obligations;</div></div> <div><div>2.</div><div>Contributing to effective and efficient knowledge management;</div></div> <div><div>3.</div><div>Ensuring full, accurate records are created which capture all business activities; and</div></div> <div><div>4.</div><div>Ensuring disposal of records is controlled.</div></div>			
Scope:	<div><div>UOWGE</div><div>✓</div><div>UOWCA</div><div>✓</div><div>UOWD</div><div>✓</div><div>UOWCHK</div><div>✓</div><div>UOWMKDU</div><div>✓</div><div>UOWI</div><div>✓</div></div>			
	This Policy applies to UOWGE operations and staff at: <div><div>1.</div><div>UOW College Australia (UOWC Ltd);</div></div> <div><div>2.</div><div>University of Wollongong in Dubai (University of Wollongong in Dubai FZ-LLC);</div></div> <div><div>3.</div><div>University of Wollongong Malaysia, UOW Malaysia KDU Penang University College, UOW Malaysia KDU College, and UOW Malaysia College (collectively, UOWM);</div></div> <div><div>4.</div><div>UOW College Hong Kong;</div></div> <div><div>5.</div><div>University of Wollongong- India Branch (UOWI); and</div></div> <div><div>6.</div><div>UOWGE Ltd.</div></div>			
Related Documents:	Privacy Policy Records Management Policy UOW Records Management Policy UOW Records Management System (RMS) User Guide			
References and Legislation:	<i>Company Act of Malaysia 2016</i> <i>Corporations Act 2001 (Cth)</i> <i>Dubai Technology and Media Free Zone Private Companies Regulations</i> <i>Education Services and Quality Assurance Agreement UOW – UOWD</i> <i>Evidence Act 1995 (NSW)</i> <i>Federal Law No 8 (1980) – UAE Labour Law General Retention and Disposal Authorities</i> <i>Government Information (Public Access) Act 2009 (NSW)</i> <i>Health Records and Information Privacy Act 2002 (NSW)</i> <i>Privacy and Personal Information Protection Act 1998 (NSW)</i> <i>Personal Data Protection Act 2010 (Malaysia)</i> <i>Public Finance and Audit Act 1983 (NSW)</i> <i>Records Management System (RMS) User Reference</i> <i>Standards for Licensure and Accreditation (UAE)</i> <i>Standard on Full and Accurate Records (NSW)</i> <i>Standard on the Physical Storage of State Records (NSW)</i> <i>State Records Act 1998 (NSW)</i> <i>State Records Regulation 2015 (NSW)</i> <i>UAE Federal Commercial Transactions Law No 18 of 1993</i> <i>UAE Federal Civil Transactions Law No 5 of 1985</i>			



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1. Definitions

Word/Term/Acronym:	Definition:
Archives	Records that have been selected for indefinite retention on the basis of their continuing value for legal, administrative, financial or historical purposes, but are no longer required for current use.
Business activities	Any action that contributes towards UOWGE's decision-making processes or service delivery. This includes all UOWGE functions, processes, activities and transactions.
Full and accurate records	A record that: <ol style="list-style-type: none">1. Correctly reflects what was done, communicated or decided, and can be trusted as a true representation of the transactions or events which it documents;2. Is authentic, for example the record can be proven to be what it claims to be, to have been created or sent by the person claimed to have created or sent it, and to have been created or sent at the time claimed;3. Has integrity by virtue of being complete and protected against unauthorised access, alteration, deletion or loss; and4. Is usable by virtue of being understandable, complete, retrievable and available.
Knowledge management	A multi-disciplined approach to achieving organisational objectives by making the best use of knowledge. Knowledge management focuses on processes such as creating, acquiring, sharing and preserving knowledge and corporate history, and the cultural and technical foundations that support them.
Managing Records	The processes surrounding the life cycle of a record, including but not limited to, storage, assignment of metadata, retrieval, transfer, preservation, and disposal.
Metadata	Information used to describe the context and structure of records and their management. Accurate metadata enables users to identify and retrieve records efficiently, as well as assigning records a custodian.
Record	<p>Any document or other source of information compiled, recorded or stored in written form or on film, or by electronic process, or in any other manner or by any other means (<i>State Records Act 1998 (NSW)</i>).</p> <p>Records include but are not limited to, paper-based letters and documents; and electronic records including emails, databases and electronically stored documents.</p>



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	Records do not include personal or private documents that are not part of the official business of the Institution.
Records Management Program	The management framework, people and recordkeeping systems required to manage full and accurate records over time. It covers all records and recordkeeping systems and includes the identification and protection of records that may be required as State archives.
Record Management System (RMS)	The University of Wollongong (UOW) and UOWGE utilise the Oracle Universal Records Management System.

1. Principles

- 1.1. Maintaining effective records are essential to UOWGE business operations to ensure that evidence of the Institution's actions are protected and preserved.
- 1.2. Records provide an important source of information about the Organisation's business activities that can support subsequent activities and business decisions and ensure accountability to present and future stakeholders.
- 1.3. Record-keeping practices should be embedded and contextualised within UOWGE procedures and plans.

2. Identifying Records

- 2.1. Records can be understood as information which:
 1. Is written, received or used in the course of UOWGE business dealings;
 2. Approves or authorises actions;
 3. Signifies a policy change or development;
 4. Commits UOWGE to an arrangement or business deal;
 5. Contains advice or provides guidance for people inside or outside UOWGE;
 6. Requires UOWGE to take an action; or
 7. Is likely to be reviewed or audited, no matter the form.



- 2.2. Stipulation 7: Course Files of the CAA Standards for Licensure and Accreditation provides further examples of records in the context of the UAE.
- 2.3. Records provide continuing value as evidence of significant decisions, reasons and actions that support the activities of the unit/division or the Institution.

3. Creating Records

- 3.1. All staff are required to keep records that fully and accurately reflect the functions, activities, transactions, operations, policies, procedures, administration and management of UOWGE.
- 3.2. Records should be full and accurate and created as soon to the commencement of a business activity or issue as practical.
- 3.3. Full and accurate records is defined in the Standard on Full and Accurate Records. Key principles include:
 - 1. Records are made and captured as soon as possible to the occurrence of the business activity or issue to which it relates;
 - 2. Records should be accurate and trusted as a true representation of the transaction or events which it documents;
 - 3. Records should be authentic and proven to be what it claims to be;
 - 4. Records should have integrity and be preserved in such a way that no unauthorised access, addition, alteration or disposal can occur; and
 - 5. Records should be usable, understandable, complete, retrievable and available through time.

4. Storing and Maintaining Records

Australian Operations

- 4.1. UOWGE Australian operations utilises the UOW Records Management System (RMS) to store records.
- 4.2. All UOWGE Australian records must be stored within the RMS. Electronic records must be uploaded into the RMS, including records stored on any Share Drive as well as emails which document business activities. Hard copy records must be converted into a digital format before being uploaded into the RMS.
- 4.3. The use of other non-UOW managed electronic systems to capture and manage records in an electronic format must be approved by the relevant UOWGE Executive.
- 4.4. Where hard copy records are maintained, records will be managed in accordance with the physical storage requirements outlined in Section 6 of this Policy.
- 4.5. Each record is to have accurate metadata assigned to it.
 - 1. Metadata must meet the minimum standards issued under the *State Records Act 1998 (NSW)*;



2. Each unit is responsible for developing document-naming conventions, including metadata conventions. In developing these conventions, managers are to consider the UOW Metadata Standards.
- 4.6. Each record is to have an appropriate security classification assigned when uploading the record into RMS.
- 4.7. Individuals should refer to the Records Management System (RMS) User Guide for information on using the system.

5. Records to be maintained in hard-copy

- 5.1. A physical copy of certain records (even after they are digitised) must be kept to comply with State Records requirements. Details of such records can be found in the *GA-47 General retention and disposal authority: higher and further education*.
- 5.2. In addition to the State Records requirements, the following documents must be kept in their original hard copy form:
 1. Legal documents physically lodged with the UOWGE's Executive Director Commercial and Legal;
 2. Records identified as having continued or permanent archival value and which are no longer in use for official purposes should be maintained for historical reference and to ensure the preservation of UOW's and UOWGE's corporate and social memory.
- 5.3. Hard-copy records in Australia must be stored in accordance with the *State Records NSW Standard on the Physical Storage of State Records*.

6. Ownership, Custody and Control of Records and Archives

- 6.1. All records created by staff or received by staff in the course of UOWGE operations and activities, are owned by UOWGE unless otherwise specified under contract.
- 6.2. Control of records assessed as being State Archives under the retention and disposal authorities issued under the *State Records Act 1998 (NSW)* will eventually transfer to State Records NSW.
- 6.3. The custody of State Archives will remain with the University Archives in line with the distributed management agreement with *State Records NSW* and *UOW's Record Management Policy*.

Security of Records

- 6.4. Records must be kept secure.
- 6.5. For records stored within RMS a security classification must be selected when uploading the records.
- 6.6. Records can be classified either as:
 1. Public: a record that can be accessed by all staff with RMS access. This is the default setting in RMS; or

2. Secure: a record that can only be accessed by staff associated with that workgroup within RMS.

Access to Records

- 6.7. Access to records by UOWGE Staff:
 1. Staff should only access records for which they have a legitimate need in the capacity of their employment with UOWGE.
- 6.8. Access to records by external parties:
 1. External parties should not be given access to UOWGE records without the consent of the appropriate Manager; and
 2. Provision of original, physical, records should be avoided.

Freedom of information requests

- 6.9. For access to records via subpoena, warrant, or a request under the *Government Information (Public Access) Act*:
 1. Any legal request for records should be immediately directed to the Executive Director Commercial and Legal;
 2. Access to records subject to a subpoena, warrant of request under the *Government Information (Public Access) Act* must not be supplied without the prior approval of the Executive Director Commercial and Legal or nominee; and
 3. Records related to any legal matter must not be disposed of during a proceeding or in the existence of an outstanding request.

7. Disposal of Records

- 7.1. Records must be retained for the minimum retention period stipulated in the General Retention and Disposal Authorities and, where relevant, Records Matrix.
- 7.2. Records to be destroyed must be documented, for future requirements, freedom of information requests and other legal matters.
- 7.3. All records must be disposed of in a secure manner in accordance with the *State Records Act 1998* or, where relevant, policy and/or procedure.
- 7.4. Disposal of records within RMS:
 1. The lifecycle of records within RMS are automatically monitored by the system;
 2. RMS will recommend, in accordance with the disposal criteria of the records category, that a record be disposed. Where disposal is recommended, approval from the Divisional Executive will be sought before the records are destroyed; and
 3. Approval of the destruction of a record must not be given where the destruction of a record would contravene the minimum period detailed in the General Retention and Disposal Authorities.

- 7.5. Special provisions relating to residual records stored outside of the RMS:
1. Where records exist outside of RMS, the relevant manager is responsible for managing records, including determining whether the records should be destroyed; and
 2. Notifying relevant parties.
- 7.6. Records that are no longer in use for official purposes but have long-term or continuing value must not be destroyed.

8. Staff Training

- 8.1. UOWGE is committed to providing staff with training to ensure that this policy is maintained.
- 8.2. All Australian based staff using the UOW Records Management System should attend RMS training. The UOW Records Management Unit provides this training.

9. Roles & Responsibilities

- 9.1. All Staff are responsible for:
- 9.2. Ensuring the records of UOWGE are managed and maintained in accordance with this Policy;
1. Keeping accurate and complete records of their activities; and
 2. Complying with data protection principles, privacy and confidentiality requirements as specified in legislation or relevant UOWGE Policy.
- 9.3. Managers are responsible for:
1. Overseeing record management in their portfolio; and
 2. Management of any records that are not contained in RMS.
- 9.4. UOWGE Commercial and Legal is responsible for:
1. Maintaining the Records Management Policy; and
- 9.5. Providing advice to UOWGE staff and management on issues of record management, including storage and disposal.
- 9.6. UOWGE Executive retains ultimate responsibility for recordkeeping in their portfolio.

10. Change History

Version	Approved By	Date Effective	Amendment
1	Marisa Mastroianni	15/12/11	Complete review of policy, migrated to new template



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2	Executive Director, Commercial and Legal	08/02/2018	Substantive review of Policy. Clarified the role of the UOW RMS on operations. Inclusion of UOWD in scope to ensure compliance with the Public Finance and Audit Act 1983 (NSW) and various additional references to contextual requirements.
3	Executive Director, Commercial and Legal	04/07/2024	Minor administrative change to include University of Wollongong- India Branch (UOWI).