RECORDS MANAGEMENT POLICY AND GUIDELINES

The Mico University College

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	Chairman of the Sub-Committee
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1.0   GENERAL

The Records Management Policy is intended to provide a framework for the efficient creation, organization, maintenance, use and disposal of records within the Mico University College.

2.0   SCOPE

This policy applies to all records that provide evidence of and accountability for the business of the University College.

3.0   DEFINITION

Records are defined as information created, regardless of medium or characteristics made or received and maintained as evidence by an organization or person in pursuance of legal obligations or in the transaction of business – and the non record information that support and document these practices.

For the Mico University College, records are any documented information regardless of format (physical or electronic) created or received by employees transacting business on behalf of the University.

They may include but are not limited to:

a) Financial records such as requisitions, purchase orders, invoices, bank data,   and ledgers or journals

b) Administrative records such as correspondence, reports, policy statements and related items sent and received

c) Minutes of all University boards, committees and other groups

d) Personnel records of faculty, staff, and students

e) Student records

f) Publications and other items issued by the University

g) Sound recordings, video recordings or photographs of University faculty, staff, groups or events

h) Course outlines, self study documents, exam scripts, practicum documents, curriculum documents, research papers.

4.0   OBJECTIVES OF THE POLICY

The University is committed to maintaining an effective records management   programme whereby the records created, used and received meets business needs, legal requirements, accountability requirements and fiscal requirements.

This policy applies to all records, regardless of format, whether they are maintained in hard (paper) copy, electronically.

This policy provides for:

i)   the creation and management of records that have integrity, are authentic, reliable and useable;

ii) the establishing of a proper system for registration, identification, storage, retrieval and destruction of records that have administrative, legal, historical and fiscal value;

iii) ensuring that records are adequately protected;

iv) the establishing of a records management system that will ensure the protection of the privacy of faculty, staff and students;

v) ensuring that records are capable of supporting business functions as long as they are required;

vi) optimizing the use of space and minimizing the cost of retention through the orderly and continuous transfer of semi-active or inactive records from prime or inadequate storage area to a Records Centre/Archival Centre;

vii) ensuring that records that are no longer needed or have become obsolete are destroyed in a systematic way at the appropriate time;

viii) ensuring that records of continuing value and those that document the University's history are preserved;

5.0   POLICY STATEMENTS

5.1   Records to be captured into the system

The records to be captured into the Mico University College records system are those that:
a) Meet its business needs
b) Meet its accountability requirements
c) Meet its regulatory requirements

These will include records determined by the various departments as well as those identified by the records inventory.

A list containing the record series/types relating to the various departments shall be compiled and distributed to each department

5.2   Records Retention

The systematic disposal of records is an essential part of any records management programme. The decision about how long records should be maintained within the records system shall be based on legal requirements, business and accountability requirements.

5.2.1   At The Mico University College a Records Management Committee shall be responsible for making recommendations for the retention periods of all records. This Committee shall be made up of the following officers

- Vice President Academic Affairs,
- Vice President of Administration,
- Assistant Registrar of Student Affairs-Admissions,
- Assistant Registrar of Student Affairs-Examinations,
- Director of Human Resource,
- Registrar,
- Legal Services representative (ex-officio member),
- Internal Auditor,
- Director of Finance/Bursar
- Head of the ICT and E-Learning,
- Records Manager
- Other staff as required.

The Records Management Committee shall be chaired by the Records Manager. The recommendations for retention periods shall be approved by the President.

5.2.2   All records created or received by the employees of the Mico University College in the course of their duties shall be retained for as long as they are required to meet the legal, administrative and operational requirements of the University, after which they shall be destroyed or transferred to a designated Records Centre for storage and preservation.

5.2.3   Records shall be retained for the periods stated in the Retention Schedule. Notwithstanding minimum retention periods, all records shall be maintained until all the required audits are completed.

5.2.4   Records shall be kept beyond the listed retention period if litigation or investigation is pending or in progress. A legal hold process shall be in place to deal with such records.

5.3   Registration of records

All records received into the records system shall be registered. Registration will provide evidence that a record has been created or captured in the system.

The metadata of the record (author, subject, date of transaction, date of receipt, recipient, the subject, the classification) shall be documented on a Records Registration form by manual or electronic means.

5.4   File Creation

Files are usually created to keep a record of an ongoing history on a subject or activity, as well as previous action, decisions or investigations.

5.4.1   Files shall be created by authorized personnel

5.4.2   Files shall be created when:
- i)   a new function, activity or project has been started
- ii)   an existing subject, activity or project is further developed and necessitates splitting them across several files
- iii)   an existing file has become too large and a new part is required
- iv)   no existing file is appropriate for the record

5.5   Records classification

Classification provides a unique identification for each file created. This system groups a set of records together. It is important that each file has its own identity. To accomplish this each file shall have its own file/classification number and or title.

5.5.1   Files shall be classified based on the classification system developed by the Mico University College and its departments.

5.5.2 The system used by the University College for classifying and titling files/records should be systematic and based on a standard format. They should be devised in consultation with the creators of the records.

5.6 Records Storage

Records should be stored on media and under conditions that ensures their authenticity, integrity, reliability and useability as long as they are required.

When storing records the University College should consider storage equipment, adequate space and accessibility, security, temperature and humidity control and damage prevention. Any storage equipment used (storage boxes and file drawers) should be clearly marked with a description or workable code that is sufficiently effective to retrieve the information later.

5.6.1 Due to space constraints and the nature of the operations at the Mico University College records shall be maintained under a decentralized system.

5.6.2 These decentralized records shall be listed on a central filing list containing details such as, file number, title and location. This list shall be maintained by the Registrar and the Records Manager

5.6.3 The designated storage areas for records within the University are:

   i)   The Registry for records relating to the Board of Directors
   ii)   Student Admissions for student records, other records providing documentary evidence of student affairs
   iii)   The Human Resource Department for employee files
   iv)   Finance Department for fiscal records e.g., cheques, payment vouchers, payroll information etc.,
   v)   Faculty and departments for administrative records
   vi)   A Records Centre and Archival facility for inactive files, historical records and others records having archival value.
   vii)   Off-site storage facilities for vital records.

5.6.3 A third-party storage facility may be used to store records so long as the storage facility is able to meet the University's operational needs and any legal requirements. All employees of the University contracting with third parties must convey any relevant University information management policies to third party storage contractors, and make privacy and security obligations of those contractors enforceable by contract

5.6.4 The Mico University College shall maintain appropriate organization and physical storage environments for digital records. Departments shall arrange for backup of University digital records. This backup shall be maintained throughout their retention period, such that hardware, software, human error or other failure will not change the required or suggested retention period of those digital records

5.7 Records Security

The security of all records is crucial as they provide evidence of business transactions, support decisions and ensure that public accountability requirements are met. Appropriate procedures and processes shall be put in place to ensure the physical and intellectual security of University records.

The Mico University College must implement practices that protect confidential information contained in University Records in accordance with relevant laws and University policies. Such protections must be applied in maintaining Active Records, the storage of Inactive and Archival Records, and the destruction of Expired Records.

5.7.1 Records, regardless of format shall be stored securely to prevent unauthorized access, destruction, removal or alteration.

5.7.2 Employees are responsible for the safe keeping of all files and documents that are borrowed by them. When an action is completed the file/document shall be returned to the officially designated storage area.

5.7.3 Files and documents containing sensitive or confidential information shall be placed in a secure storage area. Confidential records shall be stored in locked storage cabinets.

5.7.4 Wherever possible, file storage units shall be locked overnight to prevent unauthorized access.

5.7.5 All vital records shall be stored in protective or fire resistant cabinets/vaults. Copies of vital records shall be stored off site, wherever possible.

5.8 Records conversion and migration

Records systems should be designed so that records will remain authentic, reliable and useable throughout any kind of system change, including format conversion, migration between hardware and operating systems, or specific software applications, for the entire period of their retention.

5.9   Records Access

Access to records is governed by the nature of the content, the regulatory framework within which the University College operates as well as the business needs and requirements of the University College. The Mico University College shall develop and maintain a system that will protect records from unauthorized access, disclosure, deletion, alteration and destruction.

5.9.1   Records are only to be released to those who are authorized to see them. The University Registrar shall maintain a list of confidential records to which access or information about them is not permitted. The list shall be approved by the President, Vice president of Administration and Vice president of Academic Affairs and the Head of the Human Resource Department.

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5.9.2   Dean of the Faculties and Department Heads with specific business functions can specify access permissions to records relating to their area of responsibility.

5.9.3   Once a record has entered the Records Management System all processes and transactions shall only be undertaken by persons so authorized.

5.10   Records tracking

The University Records Manager in collaboration with designated Records Liaison Officers shall design and implement a system which documents the movement of records to which faculty and departments shall adhere. This will minimize the loss of files and ensure that they can be easily located when required and also monitor the use of the records.

5.11   Records disposal

Disposition is the process of deciding whether to keep, transfer or destroy records. The authority to do this is set out within the Retention and Disposal Schedules. Records shall be disposed of on a systematic and routine basis. Action to dispose of a record should not take place without the assurance that the record is no longer required, that no work is outstanding and that no litigation or investigation is current or pending which would rely on the record as evidence. The Mico University College therefore needs to confirm that the retention period of the documents has expired and that there is no legal hold on the records before they can be disposed of.

5.11.1 The destruction of records shall always be authorized and recorded.

5.11.2 Records should only be disposed of through the procedures approved of by the University College.

5.11.3 Records pertaining to pending or actual litigation or investigation shall not be destroyed

5.11.4 Records destruction shall be carried out in such a way that preserves the confidentiality of any information they contain. The method/s used for the destruction of records shall be indicated in the Certificate for Records Destruction.

Destruction can be accomplished in a variety of ways:
  a. Recycling
  b. Trash
  c. Incineration
  d. Shredding
  e. Pulping

The University Records Manager is responsible for contacting and consulting with the University's Information Technology department to ensure that obsolete records contained in a University College centrally managed system are properly destroyed.

Devices or other media that store electronic records (e.g., jump drives, CDs. etc.) should be destroyed in a manner consistent with media sanitization methods which include disintegration, incineration, pulverization or melting. The method chosen will depend on the type of media and the contents they hold.

5.11.5 All copies of records that are authorized for destruction, including security copies, and backup copies should be destroyed.

5.12   Legal and regulatory requirements

5.12.1 The Mico University College shall seek to comply with the following regulatory requirements as they relate to the management, control of records as well as access to records, but are not restricted to these.
  a. Archives Act
  b. Evidence Act
  c. Financial Administration and Audit Act
  d. Limitation of Actions Act
  e. Access to Information Act
  f. Copyright Act
  g. The Education Act

5.13   <u>Monitoring and auditing</u>

The Records Management system should be regularly monitored and audited to ensure that procedures and processes are being implemented according to the University College's policies and requirements and that they meet the anticipated outcomes. Such reviews should examine organizational performance and user satisfaction with the system. The reviews shall be carried out by the Audit Department of the University College.

Modifications to the records system and records management processes should be made if these are found to be unsuitable or ineffective.

Systems compliance and monitoring should be documented and reports should be maintained.

6.0   RESPONSIBILITY

6.1   The President will approve the Records Management Policy and provide the resources to implement the policy where deemed appropriate.

6.2   The policy is carried out under the Authority of the President and will be reviewed and amended as required in consultation with the Records Management Committee and Heads of Faculties and Departments.

6.3   The ownership of the policy rests with the Vice President, Administration.

6.4   Responsibility for development, implementation, maintenance and evaluation rests with the University College Records Manager

6.5   A Records Management Committee shall be established as an integral part of the University's Records Management Programme. This Committee shall provide advice and guidance based on the Terms of Reference. See Appendix 1.

6.6   The Heads of Faculties and Departments are responsible for supporting the application of records management policies, processes and practices throughout the University College and ensuring compliance.

6.7   Faculties and Departments will assign a designated officer to liaise with the University College Records Manager as their primary contact for records management.

6.8   All employees are responsible and accountable for creating and keeping accurate and complete records of their activities. They should ensure that original copies of all records documenting their business transactions are deposited in the officially designated repositories.

6.9   The Director of Human Resources and the University Records Manager will facilitate /provide the training and necessary support and advisory services to all the University College departments to ensure that records management procedures and controls are applied.

6.10   The University College Records Manager will liaise with the Department of Information Technology concerning the appropriate creation, use, maintenance, and disposition of electronic records in University College systems.

7.0   GUIDELINES

7.1   The Characteristics of records

7.1.1   General information

For information within the Mico University College to be effective and support accountability, all records containing such information should be authoritative, comprehensive and retrievable. The following characteristics shall apply to all records captured in the Records Management System

7.1.2   Authenticity

This applies to the genuineness and accuracy of a record. It means that the record has not been altered, manipulated or otherwise changed since its creation.
The question to be applied here is this. Is it a true record?

For any record to be authentic it has to be proven:
a)   to be what it says it is
b)   to be created by the person who says they created it
c)   to be created at the time it was said

7.1.3   Reliability

A reliable record is one whose contents can be trusted as a full and accurate representation of the transaction, activity or fact to which they can attest.

Therefore the how, when and by whom a record has been created are important factors.

For records created within the Mico University College to be deemed reliable they should be created

a)   At the time of a transaction or incident to which it is relevant or shortly after.

b)   by individuals who have knowledge of the fact

7.1.4   Integrity

This applies to the completeness and accuracy of a record.

For a record to maintain this status it has to be protected from unauthorized alterations.   No additions, annotations and deletions may be made to an original record after it has been officially deposited into the system.   In the event that annotations, additions or deletions are made to an original they should be explicitly indicated and traceable.

7.1.5   Useability

A usable record is one that can be located, retrieved presented and interpreted.

All records should be organized (classified, assigned appropriate title and filed) in such a way that they can be easily accessible, retrieved in a timely and efficient manner for whatever length of time they are needed.

7.2   Characteristics of the Records Management System

7.2.1   General
Requirements to create and maintain records must be feasible, consistent and properly incorporated into the records management system design

The system designed will be documented and records of its maintenance kept. Such documents include:

- System Plans
- System Business Rules or regulations

- System Specifications
- System Architecture and components
- File plans

A records system should be responsive to changing business needs without impacting on the characteristics of the records in the system. Similarly when records are transferred from one system to another e.g. paper based to electronic, the transfer should be carried out in a way that does not adversely affect the characteristics of the records.

The Records Management System should reflect the following characteristics.

7.2.2   Reliability

The Mico University College will design a system that is capable of continuous and regular operation. The Records Management System should:

a) routinely capture all records within the scope of the business activities of the University;

b) Organize the records in a way that reflects the business processes;

c) protect the records from unauthorized alteration or disposition;

d) function as the primary source information for reference and decision making;

e) provide ready access to all relevant records and related metadata

7.2.3   Integrity

In order to ensure records integrity the following control measures must be in place:

a) Access monitoring
b) User verification
c) Records security
d) Authorized destruction

For electronic records, the University must prove that any system malfunction, upgrade or regular maintenance does not affect the records integrity.

7.2.4   Compliance

Procedures must be developed to ensure compliance with current business practices, regulations, and community expectations.

Personnel creating records must be made aware of these requirements

Regular assessment of the compliance of the records system must be done using the existing monitoring and auditing process. Records of assessments should be maintained for evidential purposes

7.2.5 Comprehensiveness

The Records Management System should manage records that result from the complete range of business activities for the University College, or the section of the University College in which they operate

7.2.6 Systematic

Records should be created and maintained in a systematic manner.

A Records Management System should have accurately documented policies, assigned responsibilities and formal methodologies for its management.

7.3 Designing and Implementing records systems

7.3.1 General information

A records system should have functionality that enables it to carry out and support the records management processes. Decisions about design and implementation of a records system and the processes they support should be considered in relation to other existing organizational systems.

7.3.2 Documenting records transactions

A record system should contain complete and accurate representation of all record transactions that occur in relation to a particular record. These include processes associated with a record from its receipt into the system to its disposal. These details shall be documented. They may also be recorded as audit trails which should be kept as long as the document to which it relates is retained.

7.3.3 Physical Records storage

Records require storage conditions and handling processes that take into account their specific physical properties. Storage conditions and handling processes should be designed to protect records from unauthorized access, loss or destruction and from theft and disaster.

The environment and medium on which a record is stored should be appropriate to the type of record. Knowing how long the records will need to be kept and maintained will affect decision on storage media as well as the environment.

7.3.4 Protection of records

The record system should address disaster preparedness to ensure that risks are identified and mitigated

There are a number of potential hazards to records safety. The primary ones are fire, water or chemical hazards used in fire containment. It is therefore important to have fire detecting systems and safety alarms.
Records must also be protected from other types of hazards such as earthquakes, hurricanes, mildew, theft, vandalism and pest infestation.

Special attention should be paid to vital records. These must be duplicated and stored off site.

The integrity of the record should be maintained during and after recovery from a disaster.

7.3.5 Distributed management

Record systems should be capable of supporting alternative options for the location of records. In cases where the legal and regulatory environment allows this, records may be physically stored with one department, but the responsibility and management control resides with either the creating organization or another appropriate authority. Such arrangements distinguishing between storage, ownership and responsibility for records are particularly relevant for records in electronic record systems. Variation in these arrangements may occur at anytime in the systems' existence, and any changes to these arrangements should be traceable and documented.

7.3.6 Conversion and migration

See section 5.8

7.3.7   Access, Retrieval, Use

The records system should be designed in such a way that it provides timely and efficient access to, and retrieval of records needed in the continuing conduct of business and to satisfy related accountability requirements.

The record system should include and apply conditions of access. It should indicate who has access to what records to ensure that integrity of the record is not compromised. The system should provide and maintain an audit trail or other methods to ensure that records are effectively protected from unauthorized use, alteration or destruction.

The University College will stipulate and regulate who is permitted access to records and in what circumstances. Some regulations e.g., the Access to information Act; The Archives Act covers areas such as privacy, security, freedom of information and Archives.

7.3.8   Retention and disposal

A record system should be capable of facilitating and implementing decisions on the retention or disposal of records. It should be possible for these decisions to be made at anytime in the existence of a record or during the design stage of a record system. It should also be possible where appropriate for disposition to be activated automatically.

At The Mico University College the retention and disposal of records will be guided by a Retention Schedule. Records shall be disposed of on a systematic basis, whether every six months or once a year.

7.3.9   Monitoring and auditing

See Section 5.13

7.3.10 Training

In order to conform to the standard ISO 15489 "Information and Documentation – Records Management" and to adhere to the "Records Management Policy and Guidelines " the Mico University College shall establish an ongoing programme of records training.

The programme of training should take into consideration the roles and responsibilities of the management team, employees, or any other individuals responsible for the whole or part of the business activity of the University College in making records during their work and in capturing those records into the Records Management System.

7.4   The management of e-mail and web site records

7.4.1   The e-mail as a record

Any e-mail that is received or created while undertaking or completing a business transaction is considered a record.

7.4.2   Examples of e-mail records

The following are some examples of e-mail records that must be   preserved and disposed of in accordance with the University College Records Retention Schedule.

- E-mail that documents reports or minutes of meetings (not notification of meetings), of significant decisions and commitments reached, or actions taken as a result.

- E-mail that facilitates action by the University College community.

- E-mail that protects the financial, legal and other rights of the University College and persons directly affected by its action.

- E-mail that provides documentation of significant department decisions and commitments reached orally (person to person, telecommunications, or in conference) and not otherwise documented in department files.

- E-mail that conveys information of value on important department activities e.g., data on significant programmes, projects.

7.4.3   Handling e-mail records

Having been identified as a record, the control procedure for records will be strictly adhered to.

7.4.4   The web site as a record

A web site functions as a means of communicating with the University College's external public, as well as communicating with the staff members. This renders the content of these web sites a matter of public or organizational record and as such the content is therefore subject to the policies and guidelines relating to the management of records.

7.4.5   Handling of web site records

Whenever changes are made to any of the University College's web site, the modified web site shall be considered to be a new version and release and the previous version shall be archived.

8.0   STANDARDS

The Mico University College aims to adhere to the following guidance and best practice when managing University College records and when providing advice and guidance to University College's record holders.

- The Mico University College. *Records Management Policy and Guidelines*.
- The Mico University College. *Records Disposition Authority*
- The Mico University College. *Records Retention Schedule*
- The Mico University College *Records Management Manual*
- International Organization of Standardization (ISO). *Information and Documentation – Records management ISO 15489 (2001)*

GLOSSARY

Access The right, opportunity, means of finding, retrieving and using information.

Active Record Records in frequent use, regardless of their date of creation, required for current business relating to the administration or function of the organisation. Such records are usually maintained in office space and equipment close to hand.

Capture The process of determining that a record should be made and kept in the records management system. This includes both records created and received by the organization.

Classification The process of identifying the category or categories of business activities and the records they generate and grouping them, if applicable, into files to facilitate description, control, links and determination of disposition and access status.

Confidential Data Confidential Data is information protected by statutes, regulations, University policies or contractual language. Managers may also designate data as Confidential. By way of illustration only, some examples of Confidential Data include:

• Medical records

• Student records and other non-public student data

• Personnel and/or payroll records

• Bank account numbers and other personal financial information

• Any data identified by government regulation to be treated as confidential.

Confidential Records Records that contain confidential student or employee data that should have limited access and be protected from inadvertent disclosure.

Content The intellectual substance of a document, including text, data, symbols, numerals, images, and sound. Along with context and structure, content is one of the three fundamental aspects of a record.

Conversion The process of changing records from one medium to another or from one format to another

Destruction The act of permanently deleting records beyond any possible reconstruction.

Disposal The transfer of records, especially noncurrent records, to their final state, either destruction or transfer to an archives.

File Plan
A plan or scheme developed by an office, department or organisation to organise and arrange different types of files.

Inactive records
Records no longer needed on a day to day basis but may be required for administrative, legal or historical reasons must be retained until the end of its Record Retention Period and is not required to be preserved in accordance with a Litigation Hold Notice.

ISO 15489
An International Standards Organisation for information documentation and records management. An international standard that establishes principles for creation, capture, maintenance and management over time in appropriate systems of records, irrespective of their format.

Media
The physical material, container, and/or carrier in or on which information is recorded (i.e. paper, film, DVD).

Metadata
Data that describes data such as the context, content and structure of records and their management through time.

Migration
The act of removing records from one system to another while maintaining the records' integrity authenticity, integrity, reliability and useability.

Preservation
Processes and operations involved in ensuring the technical and intellectual survival of authentic records through time.

Record
Information that has been recorded on a storage medium and can be retrieved. A record may be a paper, electronic or microfilm document, photograph, blueprint, or audio or video recording.

Record Centre
A facility used for low-cost storage of inactive and semi current records before those records are destroyed or transferred to an archives.

Record Copy
The single copy of a document, often the original, that is designated as the official copy for reference and preservation (also copy of record, official copy, principal copy).

Records Management
The field of management responsible for the efficient and systematic control of the creation, receipt, maintenance, use and disposition of records, including processes for capturing and maintaining evidence of and information about business activities and transactions in the form of records.

Registration

In those systems where registration is used, its purpose is to provide evidence that a record has been created or captured in a records system. It involves recordkeeping brief descriptive information about the record in a register, and assigning the record a unique identifier.

Responsible Department

The department designated as having the responsibility for maintenance, retention and timely destruction of the particular types of records.

Retention Schedule

A document that identifies the length of time a record must be retained in active and inactive storage and authorizes the transfer and disposition of all records of a department or division.

Semi-active records

Records which are referred to infrequently and therefore are typically stored away from the work area

Tracking

Creating, capturing and maintaining information about the movement and use of records.

Transfer

Moving records from one location to another

Vital Records

Those records that an organization needs to resume activities after a disaster or disruption of normal operating conditions.