Information Management

1.0 Purpose

This procedure provides for the operationalisation of the Information Management Policy and is part of the Information Governance and Management Framework.

2.0 Scope

This procedure applies to staff, University Council members, University associates, Griffith controlled entities, visitors, adjunct appointees, service providers, contractors and volunteers, while conducting business or activities on behalf of the University, and managing or creating Griffith information or records. The procedure does not apply to students.

This procedure applies to records and information in all formats, including both digital and physical records, created, received and used in the conduct of University business. This includes, but is not limited to, student files, staff files, correspondence, business email, administrative files, financial records, research management and minutes of meetings of University committees or boards.

The procedure covers all business applications used to create, manage and store information, including the official information management systems, email, websites, social media applications, databases and business information systems. It relates to information created and managed on-premises and off-site.

3.0 Procedure

Information management practices at Griffith are aligned to the Information Management lifecycle as set out in the Information Management Policy and detailed below.

3.1 Plan, design and monitor

3.1.1 Information and records management program

Information Management, in Digital Solutions, operationally defines, implements and monitors an ongoing program of work to fulfil the obligations of the Queensland State Archives Records Governance Policy.

3.2 Create, capture and classify

3.2.1 Identifying records

University records serve to:

- protect the rights and interests of individuals at the University
- protect the rights and interests of the University

- provide evidence of the full spectrum of business undertaken by the University

- explain and justify the actions of the University and its employees

- document and explain the decision-making of the University

- provide the context of an activity

- preserve the history of the University, and

- determine that the policies and procedures of the University were followed during the conduct of that business.

The following are **not** University records:

- documents that are not related to the University or its business activities and decisions (e.g., copies of annual reports received from other organisations)

- documents or messages of short-term temporary informational value, or otherwise designated as "ephemeral" or "transitory" in an approved Retention and Disposal Schedule

- copies/duplicates of University records, provided that the original record has been captured appropriately elsewhere in the University, and where:

  o nothing has been added, annotated, changed or deleted on the copies

  o the copies have been created, distributed and used only for reference purposes, and

  o the copies are not the subject of, or associated with, further business activity

- documents or messages (regardless of format) that have been created but not transmitted, submitted, used or otherwise relied upon (e.g., personal working documents)

- drafts not intended for use or reference (i.e., incomplete drafts), and drafts of any type of record, provided they do not contain significant or substantial changes or annotations that provide insight into the evolution of the final version

- non-business email/information of a private nature (i.e. relate to the individual's personal affairs external to their work at the University).

3.2.2 Information creation and capture

- The University conducts its business as "digital by default", wherever possible, with records created in digital format. Information received and records created digitally are to be maintained in digital format throughout the information lifecycle.

- Hard copy records are created only when necessary (e.g., where the University Seal needs to be applied).

- The University uses and maintains records in a variety of corporate information systems, including business enterprise systems as well as a dedicated records management system.

- High value and vital records must be captured in an approved records and information management system. University-approved information systems must include minimum metadata requirements to support identification, usability, accessibility and context of records and information.

- Capture of records into the records management system will be automated wherever possible.

University information, records and correspondence must not be created, stored, synced or forwarded to personal email accounts or storage locations:

- to ensure the University has met its obligations to capture, manage and retain accessible public records

- to prevent records being unlawfully destroyed or lost

- to prevent information security being compromised (e.g., malware, information inadvertently shared)

- to enable the University to fulfil discovery requests

- to prevent staff from inadvertently breaching other legislation, rules or guidelines (e.g., *Criminal Code Act 1899*, *Right to information Act 2009*, *Information Privacy Act 2009*, *IT Code of Conduct*)

- to minimise actual or perceived misconduct (refer to Crime and Corruption Commission: Management of public records advice for all employees of a public authority).

3.2.3 Information classification

- The University's Business Classification Scheme (BCS) describes the relationships between the University's functions, activities and transactions. This in turn determines the titling and numbering of records in the University's records management system. The BCS is maintained by Information Management.

- Refer to the Information Security Classification Procedure for details on assessing and classifying information.

3.3 Share, reuse and discover

3.3.1 Information access and use

- While information re-use is encouraged, information duplication is discouraged.

- Staff should collaborate on a single document to prevent the creation and storage of duplicate files, wherever possible referring to an organisational single source of truth rather than saving a further copy.

3.4 Manage and maintain

3.4.1 Management of university records and information

- The University is required to treat permanent, high-value and high-risk records as a priority. High value records are often referred to as vital records.

- Information Management will maintain a vital records plan to help maintain or re-establish operations during or after a disruption and to ensure these critical records:

  o have been identified and registered

  o are easily accessible in the event of a service disruption

  o are suitably stored and maintained, including regular review for currency and disposal.

- Vital records include all records identified as permanent retention in a Retention and Disposal Schedule in addition to:

  o disaster management or business continuity plans (which should include a vital records plan)

  o records relating to core University business operations (i.e., critical client services)

  o employee details, including contact information and payroll details

  o delegations of authority

  o current student and stakeholder records or registers

  o contracts, titles, and other signed original legal records

- licences, leases, or permits which enable the University to operate or perform a particular action
- insurance records
- financial information (e.g. current or unaudited accounting and tax records)
- infrastructure plans, operational policies and procedures
- records relating to current or potential litigation
- records protecting the legal and financial rights of clients for which the University is responsible.

- The University cannot sell, donate, give away or transfer temporary or permanent records to any organisation unless authorised by the State Archivist.

- Information Management maintains an Appraisal Plan for the routine appraisal of records within its control. This plan documents an ongoing cycle for both physical and digital records and assists to:
  - reduce storage costs
  - avoid problems of managing and storing vast quantities of records e.g, risk associated with unnecessarily storing sensitive information
  - locate records more easily by reducing their volume
  - identify records that have permanent value to the State and can be transferred to Queensland State Archives
  - ensure records are destroyed in a routine, transparent and timely way

- Shared network drives are an unacceptable location for managing University records.

- Backups of University systems, applications and shared network drives are taken for disaster recovery or business continuity purposes. They are inappropriate for managing University records unless under exceptional circumstances and approved by the Head of Information Management and Solutions.

3.4.2 Decommissioning business systems

- Queensland State Archives provides a methodology for managing records when decommissioning business systems. It covers the scenarios where:
  - all records are migrated from the old system to the new
  - not all records are migrated from the old system to the new
  - records which still exist but have become inaccessible over time.

- Information Management should be contacted early in the decommissioning process to provide guidance on managing records appropriately.

3.4.3 Digital continuity

- The defensible process for migration must be documented, approved and maintained for the same retention period as the records being migrated. Refer to Queensland State Archives guidance.

- Information retained for lengthy periods will be regularly assessed to ensure it remains reliable, accessible and usable. Remediation will be taken if it is found to be at risk. Refer to Storage of University information/records for details on file formats for long term preservation.

- Consider the purpose of the record, the retention period, the risk of the relevant format and how widely used and accepted the format is, as this will affect how records are managed and preserved

over time. The choice of file format is more critical the longer the record needs to be retained. Refer to Queensland State Archives for guidance.

3.4.4 Disaster recovery and business continuity

- A Disaster Plan for Physical Records outlines the steps required in the event of actual or potential damage to physical records in onsite premises. This plan is maintained by Information Management.

- Disaster recovery kits contain equipment for protecting physical records or staff in the event of a disaster. These kits are dedicated and marked wheelie bins which are maintained by Information Management and stored in onsite locations at the Nathan campus both in the main records area (N54) and archival storage location.

- The Business Continuity Plan outlines the steps required in the event of failure associated with the University's records management system.

3.5 Store and secure

3.5.1 Storage of University information/records

- To meet regulatory obligations for complete and reliable records, file formats for long-term temporary and permanent digital records should be:

  o based on open, documented standards, particularly those developed by standards organisations

  o an open or open proprietary format as opposed to closed proprietary

  o developed by a community rather than by single vendor

  o portable (can be independent of specific hardware, operating systems and software)

  o commonly used (at least within a specific community of practice)

  o not encumbered by intellectual property restrictions

  o uncompressed or use lossless compression

  o unencrypted.

3.5.2 Offsite storage of physical records

- Where possible, records are not actively transferred to offsite storage.

- Third party offsite storage vendors must be assessed by Information Management for their compliance with the Records Storage Standards published by Queensland State Archives prior to entering into contractual arrangements. Information Management must be consulted before records are sent to offsite storage providers and the records being transferred must be captured in the University's records management system.

- If transferred, records will be appraised, assigned a retention period, and tracked in the University's records management system to ensure that records are not retained longer than required and to ensure they are discoverable.

- The establishment of accounts with offsite storage providers will be coordinated by Information Management. Costs associated with storage, transfer and retrieval are borne by the University element requesting storage. Refer to the Information Management site (staff only) for request forms.

Retain and archive

3.5.3 Retention

- The University is subject to two main Queensland Government-issued Retention and Disposal Schedules.

    o **General Retention and Disposal Schedule:** describes the minimum retention period for records that are common across all Queensland government agencies covered by the *Public Records Act 2002*. E.g., property management, personnel management, financial management.

    o **University Sector Retention and Disposal Schedule:** describes the minimum retention period for records are unique to the university environment and is used by all Queensland universities. E.g., student administration, student services, teaching and learning, research commercialisation.

- Retention and Disposal Schedules specify the minimum period a record must be retained. Decisions to retain records longer than the minimum period should be balanced with the risk, effort and costs associated with keeping them longer than necessary.

- Retention and Disposal Schedules specify two main types of retention periods:

    o **Permanent retention:** Records specified as having permanent retention must never be destroyed. They may be retained at the University, or custody may be transferred to Queensland State Archives with the assistance of Information Management.

    o **Temporary retention:** Records specified as having temporary retention may be destroyed at some stage in the future when the conditions of retention have been met. The trigger event for disposal may never occur or are unlikely to occur until many years into the future. Often these types of records are treated the same as permanent retention records. E.g., records related to the construction of a building cannot be destroyed until the build ownership is transferred away from the University or the building is demolished.

3.6 Dispose and destroy

3.6.1 Destruction

- Records cannot be destroyed until their minimum retention period (as specified in the Retention and Disposal Schedules) has lapsed. In some instances, records must not be destroyed, even if the minimum retention period has lapsed. This may occur when:

    o a disposal freeze is issued by Queensland State Archives

    o the records are subject to legal processes such as discovery request or subpoena (legal hold)

    o the records are required for internal or external investigation

    o the records are related to an application made under the *Right to Information Act 2009*, and the additional retention period related to this request has not lapsed.

- Where records are either destroyed before the minimum retention period has elapsed (e.g., due to flood, fire or mould), or are retained but cannot be accessed (e.g., the business application required to access the records no longer exists), the University must declare early disposal to Queensland State Archives. Information Management will facilitate this process.

- Records not covered by an existing Retention and Disposal Schedule cannot be destroyed until either:

    o The relevant Retention and Disposal Schedule is reviewed by Queensland State Archives and an appropriate entry covering those records is added; or

- o The University applies to Queensland State Archives for a one-off disposal authority. Information Management will facilitate this process. Refer to Queensland State Archives for further information.

- Destruction of some University records must be documented and/or authorised prior to their destruction. The Retention & Disposal App (RADApp) combines relevant Schedules into one searchable interface. Use of the RADApp will guide staff on which records:

  - o cannot be disposed of as they are permanent retention or subject to a disposal freeze

  - o can only be disposed of once documented and authorised

  - o can be disposed of without further authorisation but must be documented (refer 3.7.2)

  - o can be disposed of without documentation or any authorisation (sometimes referred to as short term, transitory or ephemeral records).

- The RADApp includes relevant inbuilt calculators, templates and appropriate workflows commensurate with the record. All authorisations are approved as digital workflows.

3.6.2 Standing disposal endorsements

- The standing endorsement allows for records that have reached the end of their retention period and are covered by the endorsement to be destroyed without seeking further authorisation from the Vice Chancellor or Head of Information Management and Solutions as authorised delegate.

- A list of records covered by a Standing Disposal Endorsements is detailed on the Information Management site (Griffith staff only).

- Documentation of the records being destroyed under a Standing Disposal Endorsement is via the RADApp.

3.6.3 Digitisation of original hardcopy records

- Business areas seeking to digitise/scan original hardcopy records in order to destroy them and use the digital records as the ongoing business record must be guided by Information Management before commencing digitisation.

- Appropriate digitisation technical standards and quality assurance defensible processes are required to ensure that the digital record is compliant with Queensland State Archives requirements under the Public Records Act 2002. Failure to do so may mean records required for legal proceedings are deemed ineligible as evidence.

- Disposal of original hardcopy records which have been digitised must be documented and authorised prior to their destruction. Refer to Queensland State Archives for further information.

3.6.4 Transfer of custody

- Transfer of custody of University records to Queensland State Archives will be facilitated and documented by Information Management.

- Guidance on the open access period to be applied to the records will be sought from the relevant Information Leader prior to their transfer.

4.0 Definitions

For the purposes of this procedure and related policy documents, the following definitions apply:

Appraisal of records refers to the process of examining University business activities to determine which records need to be created and captured, and how long they need to be retained.

Business Classification Scheme (BCS) refers to a conceptual model of business activities, which identifies business functions and their associated activities and transactions.

Data refers to raw, unorganised facts such as numerical figures, words or characters. This term may occasionally be used interchangeably with the term 'information'.

Digital continuity means the maintenance of digital information in such a way that the information is preserved, and will continue to be accessible, for as long as required despite changes in digital technology.

Digitisation is the practice of creating digital images from paper documents and other physical media by such means as scanning or digital photography

Disposal freeze refers to the temporary cessation of the destruction of public records in relation to a specific topic or event, as issued by the State Archivist.

Early disposal (or early destruction) refers to the practice of destroying original paper records after digitisation and before the authorised retention period for that class of record has expired.

Ephemeral record or information means information of short-term temporary value, and which is not required to be registered into a public authority's recordkeeping system; these are essentially non-records.

High-risk records refers to the records that pose a significant risk to the University if they were misused, lost, damaged or deleted prematurely.

High-value records refers to the records that the University could not or would have great difficulty operating without.

Information refers to a combination of data elements which is processed, structured, or presented in a given context to make it meaningful and useful. The terms may occasionally be used interchangeably with the term 'data'.

Information Custodian refers to the position responsible for defining and implementing safeguards to ensure the protection of information in their information sub-domain in accordance with approved policies, procedures and rules.

Information Management refers to the University staff in Digital Solutions responsible for information and records management.

Legal hold refers to a process used to preserve all forms of potentially relevant information when litigation is pending or reasonably anticipated, regardless of the usual retention period relevant to these records.

Metadata means data that provides context or additional information about a record or document.

Permanent records are the records produced or received by the University that are of enduring value to Queensland.

Retention and Disposal Schedule is a document issued by the State Archivist which (a) defines the status, retention period, disposal triggers and disposal actions of public records, and (b) authorises the disposal of public records.

University record refers to any form of recorded information, received or created, that is of historical significance to the University, or which provides evidence of the decisions and actions of the University while undertaking its business activities. Records in the University's control include:

- any records created or received in the course of normal University business activity
- any records inherited or transferred to the University as a part of an amalgamation process with a 3rd party institution or as specified in legislation
- any records created or received on its behalf (e.g., when outsourcing functions or activities).

INFORMATION

Title	Information Management Procedure
Document number	2021/0000108
Purpose	The purpose of this procedure is to guide and direct the day-to-day business practices associated with the creation and management of information and records.

This procedure is written within the context of University's Information Management Policy which recognises that information is an important asset of the University and that information and records management practices must meet the University's business needs, accountability requirements and stakeholder expectations. |
Audience	Staff
Category	Operational
Subcategory	Information Management
Effective date	3 May 2022
Review date	2025
Policy advisor	Head of Information Management and Solutions, Digital Solutions
Approving authority	Chief Digital Officer

RELATED POLICY DOCUMENTS AND SUPPORTING DOCUMENTS

Legislation	Public Records Act 2002
Policy	Information Governance and Management Framework

Information Management Policy

Records Governance Policy (Queensland State Archives) |
| Procedures | Information Security Classification Procedure

Information and Data Protection Standards (Griffith staff only) |
| Local protocols | Retention and Disposal Guide |