

MEMORANDUM

To: Professor Lucy Johnston, Interim Vice-Chancellor and President

From: Stef Batts-Cirilli, Deputy Director DITM

Via: Craig Mutton, Chief Digital Officer and Vice-President, Digital
via Matt Carmichael, Chief Information Officer

Date: 9 August 2024

Subject: **Records Management Program for Approval**

1. Recommendation/s

It is recommended that you **approve** and physically **sign** the Records Management Program at **Attachment 1**.

2. Background

The University of Canberra Records Management Program has been developed and finalised after consultation with the ACT Territory Records Office.

Upon signature, this document replaces the previous version, which was agreed and published on 24 December 2014. The next review of this document will be finalised before June 2029.

The University of Canberra Records Management Program key points are:

- The *Territory Records Act 2002* (the Act) requires ACT Government Universities to have an approved Records Management Program.
- The University of Canberra Records Management Program complements existing policies and procedures and is a strategic document supporting the organisational objectives and outcomes. The University of Canberra Records Management Program addresses all elements set out in section 16 of the Act.
- The University of Canberra Records Management Program has been developed in consultation with the Territory Records Office to ensure that it contains all the prerequisite characteristics and administrative arrangements.

3. Considerations

In being signed off by the Principal Officer of the University of Canberra, as defined at Section 8 of the Act:

- This Records Management Program meets the requirements of the Act for approval.

As required under Section 17(3) of the Act:

- A copy of the Records Management Program for the University of Canberra will be given to the Director of Territory Records immediately after approval of the program.
- A copy of the Records Management Program will be on the University's website and made available to the public.
- There are no non-compliance aspects requiring certification for any aspect of the Records Management Program.

4. Next Steps

The Records Management Program is attached for your consideration and signature (Attachment A).

A 'wet ink' signature at the end of Section 1 of the Records Management Program is recommended (page 6). The full document will then be published on UC's public facing website.

Recommended Stef Batts-Cirilli Deputy Director DITM Matt Carmichael Chief Information Officer Date: 09/08/2024	Endorsed  Craig Mutton Chief Digital Officer and Vice-President, Digital Date: 09/08/2021
Approved  Professor Lucy Johnston Interim Vice-Chancellor and President Date: 13 August 2024	

Appendix A

☐ Finance/Procurement	
☐ Legal	
☒ Other, as required	ACT Territory Records Office
☐ No, please explain why	

Attachment A University of Canberra Records Management Program 2024



UNIVERSITY OF
CANBERRA

RECORDS MANAGEMENT PROGRAM 2024

CONTENTS

Contents	2
SECTION 1 – RECORDS MANAGEMENT PROGRAM: INTRODUCTION	4
Compliant with the Territory Records Act 2002	4
Approved	4
Given to the Director of Territory Records	4
Implementation	4
Available for inspection by the public.	5
The responsibility of an identified senior manager.	5
Records Management Policy.	6
Records Management Procedures.	6
Approval by the Principal Officer	6
SECTION 2 – RECORDS MANAGEMENT PROGRAM: POLICY	7
Preamble	7
Policy is supported by Records Management Procedures	7
Recordkeeping requirements	7
Full and accurate records	7
Recordkeeping Standards	7
Relationship to other policies	7
Review of policy and procedures	8
SECTION 3 RECORDS MANAGEMENT PROGRAM: PROCEDURES	8
Introductory Procedures Material	8
Purpose	8
Compliance by all staff	8
Scope	8
Date and Duration	8
Recordkeeping environment	8
Recordkeeping System	8
Records Management Principles	9
Recordkeeping responsibilities	9
Outline of the legislative environment	10
Recordkeeping practices and business rules	10

The Record Keeping System	10
Security Classification of Folders and Documents	10
Making and Capturing Records	11
Locating Records	11
Storage and Movement of Records	11
Preservation of Records	11
Disposal of records	12
Public Access and Use	13
Other compliance information	15
Notification of outsourcing	15
Examination by Director of Territory Records	16
Dispute Resolution	16
Compliance Reporting	16
Program evaluation and review	16
Performance measurement and evaluation	16
Provision for review of Program	17

SECTION 1 – RECORDS MANAGEMENT PROGRAM: INTRODUCTION

The *Territory Records Act 2002* (the Act) requires the University to have an approved Records Management Program. This introductory section of the Records Management Program identifies characteristics of the Program and administrative arrangements that affect it.

This is the Records Management Program for the University. It complements existing information management frameworks and policies. It is a strategic document supporting the University's objectives and outcomes.

Compliant with the Territory Records Act 2002

The University's Records Management Program:

- Addresses all the elements set out in section 16 of the Act. and
- Meets all the requirements set out in the Standards and Codes released by the Director of Territory Records under the Act.

Approved

In being signed off by the University's Principal Officer, as defined at Section 8 of the Act, this Records Management Program meets the requirements of the Act for approval.

This Records Management Program meets the requirement of Section 17 of the Act, because:

- It complies with approved Standards and Codes. and
- The University has notified the Director of Territory Records as to which approved functions from the *Whole of Government Records Disposal Schedules* are appropriate for the records created by that agency. and
- The Records Management Program contains all the arrangements required under Section 16 (2) of the Act. and
- In relation to records that could allow people to establish links with Aboriginal or Torres Strait Islander heritage, it has consulted with the Territory Records Advisory Council.

The contents of the approved Records Management Program will be promulgated throughout the University in a way that enables all employees to know of the Program and its contents.

Given to the Director of Territory Records

As required under Section 17(3) of the Act, a copy of the Records Management Program for the University will be given to the Director of Territory Records immediately after approval of the Program.

Implementation

As Principal Officer of the University, I ensure that the University complies with its Records Management Program, which will be implemented by the following means:

- The University's Records Management Program provides suitable performance indicators, directions, and targets, as appropriate, to enable inclusion as a result area in corporate plans and where appropriate Annual Reports, on matters relating to the University's records management.
- All University records are stored in appropriate and secure environments.

- The roles, authorities, and responsibilities of all University staff in relation to recordkeeping are defined and promulgated to all staff.
- Relevant position profiles and duty statements reflect the records management skills required by the University.
- Training for records management and general staff in recordkeeping skills and responsibilities is available and monitored.
- Records Disposal Schedules have been approved by the Director of Territory Records under section 17 (1)(b) of the Act for the agency's functions and their use is monitored.
- Performance measurement forms an integral part of the Program. and
- The University's Records Management implementation is reported on annually in accordance with current Annual Report Directions issued by the Chief Minister and Cabinet Directorate.

Available for inspection by the public.

Section 21 of the Act requires that Records Management Programs must be available for inspection by the public. After approval by the Principal Officer, this entire Program (subject to the qualification below) will be available free of charge:

- During ordinary working hours at the office of the Principal Officer. and
- On the Internet and findable using common search terms, by commonly available search engines.

In addition, copies of the Records Management Program may be made available for public inspection at other places on other media.

Where elements of the University's Records Management Program refer to the existence of documents affecting relations with the Commonwealth and the States, or affecting the enforcement of the law and the protection of public safety which should not be made available to the public, the University will release a modified version of the Program, which protects this information. This echoes the practice of the *Freedom of Information Act 1989*.

Responsibilities.

The University's Principal Officer has statutory responsibility under the Act for ensuring that the Records Management Program is created, approved, implemented, and adhered to. The Principal Officer has appointed a Senior Manager to have responsibility for delivering the Records Management Program and reports to the Principal Officer on its delivery.

The Deputy Director, DITM is the University's Senior Manager with responsibility for records management, including this Records Management Program.

The Deputy Director, DITM has appointed a Records Manager and Compliance Coordinator to deliver the University's Records Management Program and reports to the Deputy Director, DITM on its delivery.

The Records Manager and Compliance Coordinator is responsible for:

- Compliance with external Records Management standards.
- Implementing internal recordkeeping practices.
- Ensure all staff are aware of their individual responsibilities to create and keep records in corporate recordkeeping systems in accordance with the agency's Records Management Program.
- Ensuring that recordkeeping systems underpin and support business processes.
- Approval of Procedures that are included in the University's Records Management Program.

- Ensuring new and existing personnel under their control undertake recordkeeping awareness training; ensuring full and accurate records of business activities are made and kept.
- Developing performance measures and implementing those measures, to meet corporate objectives and relevant standards; and
- Review and update the Records Management Program on a rolling basis such that the entire program is reviewed and updated at least every five years.
- Strategic planning for records management activities, including resourcing, staffing, and budgeting; assigning records management tasks to identified positions.
- Incorporating recordkeeping principles into all business processes.
- Obtaining expert advice where required on records management issues and practices, meeting all reporting requirements.
- Arranging appropriate resources allocation to enable the program to be established and maintained, in accord with the Principal Officer's commitment in Section 1.
- Implementing performance measures and evaluation measures to meet corporate objectives and relevant standards.

Records Management Policy.

Section 2 references the Records Management Policy for the University.

Records Management Procedures.

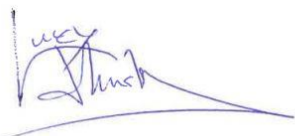
Section 3 contains the Records Management Procedures for the University.

Approval by the Principal Officer

In accordance with Section 8 of the *Territory Records Act 2002* I, Vice Chancellor of the University of Canberra, hereby approve the records management policy and procedures applying to the University.

In accordance with my responsibilities, I:

- Approve the University's Records Management Program and provide a copy to the Director of Territory Records.
- Have sought and obtained certification from the Director Territory Records for any aspects of the Records Management Program where non-compliance is necessary for university operations. Apart from these specific aspects (if any), the approved Records Management Program complies with the requirements of the Act and its associated codes. and
- Make the University's Records Management Program available for public inspection with any exempt material, such as documents affecting relations with the Commonwealth, the States and Territories, or affecting the enforcement of the law and the protection of public safety, or affecting privacy, clearly identified.



Signature of Principal Officer

13.08.2024

Date of Promulgation

SECTION 2 – RECORDS MANAGEMENT PROGRAM: POLICY

Preamble

University policy provides direction to all staff on the management of university records and applies to all records created and/or captured during the conduct of university business. The University's ["Records and Information Management Policy"](#) details how the University will adhere to the requirements of the Act.

Policy is supported by Records Management Procedures

The University's ["Records and Information Management Policy"](#) is supported by the following explanatory paragraphs and the University's Records Management Procedures (Section 3 below).

These procedures detail the way all staff in the University make, modify, use, handle, and care for records, how, and for how long records will be kept, and how access to them will be provided. Therefore, adherence to the requirements of both this Program and the Records Management Procedures is obligatory for all staff.

Recordkeeping requirements

The University makes, manages, and keeps records to support its business needs, legal and regulatory obligations, and broader community expectations. An analysis of these requirements, and an outline of the types of records that this analysis reveals the University must make and keep, is given in the University's Records Management Procedures (Section 3 below).

Full and accurate records

The making and keeping of full and accurate records of the University's activities is essential to attain its stated outcomes. It is essential therefore for all staff to make and keep full and accurate records of their activities, to ensure that such records are incorporated into the University's recordkeeping system (Content Manager) and to comply with all records management procedures.

Recordkeeping Standards

The University will conform to the *Territory Records Act 2002* and *Territory Records Office Standards for Records Management*. The University's Policies and Procedures have been developed in conformity with both the Act and the Standards. In cases where recordkeeping issues arise which are not covered by Policy or Procedures the University will seek and follow advice from the Territory Records Office and be guided by the Australian Standard on Records Management, AS ISO 15489.

Relationship to other policies

Where other University policies cover issues related to records management. The "Policy" is not to be seen as subordinate to them. In the case of any apparent contradiction between policies and procedures, the issue is to be referred to the Senior Manager with responsibility for records management for resolution.

The Senior Manager is responsible for overseeing that related policies and procedures are progressively examined to ensure that they reflect the requirements of the ["Records and Information Management Policy"](#) without detracting from their own purposes.

The ["Records and Information Management Policy"](#) is consistent with the University's Code of Conduct and the ACT Government's Code of Ethics.

Review of policy and procedures

The Senior Manager with responsibility for records management may also initiate a review of Policy and procedures at any time if circumstances make it appropriate to do so. Circumstances that would be likely to make such a review appropriate include a major change in the functions of the University or significant administrative change in it.

SECTION 3 RECORDS MANAGEMENT PROGRAM: PROCEDURES

Introductory Procedures Material

Purpose

These Records Management Procedures for the University detail the means by which the University will implement its Records Management Policies (Section 2 above).

Compliance by all staff

All University staff must comply with these procedures. Where functions are outsourced, the outsourcing contract specifies the extent of compliance with these procedures by staff under the outsourcing contract.

Scope

These procedures are designed to be a complete guide for staff of the University. In accordance with Section 8 of the *Territory Records Act 2002*, Statutory Office holders who are declared as principal officers under regulations are required to maintain their own records procedures. To assist those officers, provision has been made for them to adopt the Records Management Program and Policy.

Date and Duration

These Procedures apply from the date of approval of Section 1 of the Records Management Program of the University by its Principal Officer under the Act. They remain in force until reviewed.

Recordkeeping environment

Recordkeeping System

The University's recordkeeping resourcing comprises:

- University staff responsible for, and have the skills to manage, the University's files.
- Action officers who understand the processes and procedures for requesting files to be created, accessed, and retained by the University.
- A Records Management Policy that enforces the proper use of files to record business activity.
- Procedures and guidelines that describe the capture, maintenance, and provision of access to the files.
- A collection of paper files.
- Equipment and stationery (standard file covers, file clips, compactus, computers etc).
- *Records Disposal Schedules* that ensure legal disposal of paper files and records. and

- Records management software that controls the capture, use, access, storage and disposal of the University's files.

The University's primary recordkeeping software is **Micro Focus Content Manager** (formerly known as HP Records Manager, TRIM).

Records Management Principles

The University adopts the key principles of records management as outlined in The Australian Standard on Records Management, AS ISO 15489:

- Records are made, received, and used in the conduct of business activities. To support the continuing conduct of business, comply with the regulatory environment, and provide necessary accountability, the University makes and maintains authentic, reliable, and useable records, and protects the integrity of those records for as long as required.
- Rules for creating and capturing records and metadata about records are incorporated into the procedures governing all business processes for which there is a requirement for evidence of activity.
- Business continuity planning and contingency measures ensure that records that are vital to the continued functioning of the organisation are identified as part of risk analysis, protected and recoverable when needed.

Recordkeeping responsibilities

All University staff are responsible for recordkeeping.

The Deputy Director, DITM is the University's Senior Manager with responsibility for records management and is responsible for:

- Compliance with all parts of the University's Records Management Program
- Ensuring the University's Records Management Program is reviewed and updated to reflect all recordkeeping requirements that the University must meet (including the administrative directions of government, in Section 1 above).

Managers and supervisors at all levels are responsible for ensuring that staff under their direction, including consultants and contractors, meet all the requirements of this Policy and the associated Procedures. Records management is as important a part of their supervisory and management functions as any other part of their functional responsibilities.

The University's Records Manager & Compliance Coordinator has overall day-to-day responsibility for the University's records management and is responsible for staff with records management responsibilities to model good recordkeeping behaviour and to assist other staff in applying the requirements of the Policy and procedures.

All staff have responsibilities in relation to the records of the function they perform. They are required to make and keep accurate records of their activities, to ensure that such records are incorporated into the University's recordkeeping systems and to comply with all records management procedures.

Contractors and consultants are required to adhere to all relevant parts of the University's policy and procedures manual including the need to make and keep full and accurate records.

When staff, consultants or contractors leave the University all records must be captured onto the University's Recordkeeping systems and those records not needing to be retained are treated through normal administrative practices.

Outline of the legislative environment

Acts influencing the University's Records Management Program include:

- *Territory Records Act 2002*
- *Public Sector Management Act 1994*
- *Freedom of Information Act 1989*
- *Privacy Act 1998*
- *Evidence Act 1971*
- *University of Canberra Act 1989*

RECORDKEEPING PRACTICES AND BUSINESS RULES

The Record Keeping System

The AS ISO Standard for Records Management 15489 defines a Record as: information created, received, and maintained as evidence and information by an organization or person, in pursuance of legal obligations or in the transaction of business. The *Territory Records Act 2002* requires an agency to make and keep full and accurate records of its activities.

The records held by the University can be separated into four categories:

- Vital records
- Corporate records
- Ephemeral records
- Personal and reference material

Security Classification of Folders and Documents

Why is security important?

Security is important for all records, but the nature of electronic folders and documents makes them, without appropriate safeguards, relatively easy to access, alter or delete either intentionally or unintentionally. It is especially important to restrict access to material that has sensitivity or security issues.

a) Security

The University's corporate information security is the concern and the duty of care of every member of its staff. This material is characterised by, its unauthorised release, by disclosure, loss, compromise, misuse, or damage of which would reasonably be expected to cause harm (including financial harm) to the legitimate activities of the University.

Over classification and under classification, must be avoided.

b) Breaches of Security

Any breaches of security or suspected unauthorised access to classified material, is reported to the University's Audit and Governance office.

Making and Capturing Records

a) Creating records

The University is required to make and keep accurate records and the creation of records is a fundamental aspect of the management of any business operation.

b) When should a record be created?

Records should be created at the time of, or soon after, the event they relate to. They should be made by individuals or systems that have direct knowledge of, or involvement in, the facts of the event. This is essential for the accuracy and authenticity of the record.

Locating Records

a) Locating a record

All Records are to be stored in appropriate and secure environments. University records are stored:

- At or near users' workstations.
- RAMS on-site, and offsite storage service providers.

b) Access to Records

Records are corporate property, and may contain confidential, financial, personal, and private information. Access is controlled on a "need to know" basis. Access to records is:

- On the basis that they are for authorised work purposes.
- Restricted by locked and access controlled by keys and/or swipe card.
- Unit procedures outline how staff will access the records that they need to carry out their work.

c) Finding records

Information is made about records as they are made, captured, and received. Recordkeeping systems use this information to find records. It is usually accessible to staff in the form of indexes, registers, or other searchable metadata.

The University Recordkeeping System, Micro Focus Content Manager, is managed by training and procedurally based decisions for the level of access and security required.

Storage and Movement of Records

c) Storage

The University's records are stored both on-site and off-site. The University archives consists of a central repository under the control of the RAMS.

d) Office storage

University staff are responsible for the safe care and custody of corporate records that are in their possession. This is primarily while the records are in use and is mostly within the office environment. Corporate records, of any type and in any format, ensure they are stored in a locked container when not in use.

Preservation of Records

a) Preservation strategies

The University focuses on keeping records useable for as long as they are required. The most effective strategy is to ensure that all staff treat records carefully, to implement adequate storage standards and record handling practices, and to use archival quality materials for records expected to have a long life.

Preservation of electronic records requires strategies to migrate records to new systems in such a way that the records can be maintained as reliable, authentic evidence over time.

b) Disaster prevention and recovery.

There are a variety of definitions for disasters with some distinguishing disasters from emergencies which are:

- The definition of a minor disaster is 'that although affected, the University is still able to open for business'.
- The definition of a major disaster is 'an event that makes it necessary for the University to cease operation or in some cases seek an alternate site of operations, while the situation is rectified'.

c) Vital records.

Vital records are to be the main priorities for recovery and salvage efforts when a disaster occurs. Vital records are not necessarily valuable in monetary terms, but income and liabilities would qualify. Records are to be recovered in accordance with vital records schedules and priorities set for each functional area.

d) Special arrangements for preserving records containing information that may allow people to establish links with their Aboriginal or Torres Strait Islander heritage.

The University must conservatively manage any records that contain information that may allow people to establish links with their Aboriginal or Torres Strait Islander heritage. The legal source for this approach is the *Territory Records Act 2002* and this includes any subordinate legislation, Notifiable instrument, or Disallowable instrument.

Section 16(i) of the Act requires agencies to make arrangements for preserving records containing information that may allow people to establish links with their Aboriginal or Torres Strait Islander heritage.

Section 17(1)(d) requires agencies to consult with the Territory Records Advisory Council about such arrangements before the Principal Officer approves the agency's Records Management Program.

Disposal of records

a) Appraisal of records

University records cannot be destroyed or otherwise disposed of without first being appraised. Territory Records Office Standard for Records Management No 2 – Appraisal details the requirements for appraisal of records.

b) Records Disposal Schedules

Records Disposal Schedules are a systematic and comprehensive listing of categories of records made and/or kept by the University, which plans the life of those records from making to ultimate disposal or use as Territory Archives. The Records Disposal Schedules document whether records should be retained or destroyed once they are no longer required to meet business needs, the requirements of agency accountability and community expectations. Retention periods set down the minimum periods only and the University may keep records for longer periods if considered necessary for business requirements.

Functions nominated in the University's Business Classification Scheme (BCS) may vary with the addition of required functions and the amendment of existing functions. The BCS complies with the following requirements:

- Functions (or keywords): The function name, scope note and, where appropriate, date range. These should be consistent to name the records and to ensure that making and disposal of records are clearly linked.
- Activities: The activity name, scope note and where appropriate, date range.
- Description: A brief description of the records included in each disposal class. and
- Disposal Action: The disposal action to be applied to records in each disposal class. This designates what will ultimately happen to the records – whether they are to be destroyed and if so when that destruction is to take place or if they are to be retained as archives.

c) Normal Administrative Practice (NAP)

The NAP provision of the *Territory Records Act 2002* allows for the destruction of ephemeral material. NAP allows destruction of ephemeral, duplicate or transitory material to be carried out as part of normal University practices and procedures. NAP is not a replacement for approved Records Disposal Schedules, which also form part of the University's Records Management Program, which are the authority for destruction of university records.

The University has two types of information:

- Records required for university business: transactions that provide evidence of business activities
- Material of ephemeral value: Information messages that may have a business context but are not part of a business transaction – for example, notification of a meeting or personal or social messages.

This material does not need to be captured into the University's recordkeeping system and may be destroyed under NAP.

Advice and specific examples of NAP records are available from the Records Manager & Compliance Coordinator.

d) Authorised destruction of records.

The University:

- Use only current, approved Disposal Schedules to authorise the destruction of records.
- Ensure that sentencing staff are appropriately trained and supervised.
- Ensure that Records Disposal Schedules are correctly applied to records. And
- Ensure all sentencing decisions are recorded and retained.

e) Secure destruction.

Records approved for destruction must be disposed of securely and the information contained in the records should not be retrievable following destruction.

The University's preferred method of destruction for paper records is through the secure destruction bins, the contents of which are pulped. Records in other formats such as removable media, computer hard drives, film, video, and magnetic tapes should be destroyed by appropriate methods.

Public Access and Use

The *Territory Records Act 2002* provides for a general right of access to records. Under Section 27 of the Act the University is required to assist members of the public to make applications for access to records and must comply with any access request are:

- less than 30 days for standard requests, and
- no more than 90 days except for the most complex or large requests.

Applicants should be kept informed of the progress of their request.

a) Exemptions from access (Section 28)

Under Section 28 of the Act, agencies may apply to the Director of Territory Records to have records exempted from public access under a number of provisions set out in the Act. These are provisions from the *Freedom of Information Act 1989* and relate to records:

- Affecting relations with the Commonwealth and States.
- Affecting enforcement of law and protection of public safety.
- Affecting personal privacy.
- Subject to legal professional privilege. Or
- Disclosure of which would be in contempt of the Legislative Assembly or a court.

Section 28 Declarations provide the means by which records containing sensitive information are protected. The agency may apply to the Director of Territory Records for a Section 28 Declaration, which reinstates the provisions of the *Freedom of Information Act 1989* preventing public access to sensitive records.

When such a declaration applies there is no entitlement to access the record under provisions of the Territory Records Act 2002 however access may be permitted under the *Freedom of Information Act 1989*.

Decisions to exempt records from public access can be appealed through provisions in the *Freedom of Information Act 1989*.

To assist with the protection of "sensitive information" in care and protection records from inappropriate public access under the Act, in 2011 the Government amended the Act to allow the Director to complete a Section 28 Declaration for a record or class of records.

b) Provision for the regular review of records to which a declaration under Section 28 applies.

Because the sensitivity of information decreases with time, records to which a Section 28 Declaration applies need to be regularly reviewed to ensure that the reasons for seeking the Declaration remain current. Procedures must include provision for such regular review. This can be done by specifying that such reviews will occur as will the nomination of a position responsible for undertaking such reviews and liaising with the Director of Territory Records about them.

c) Access register

Agencies are required to maintain a register of records to which a declaration under Section 28 is in force. The register must include:

- Sufficient detail to identify the records which have been exempted.
- A copy of or reference to the Director of Territory Records' declaration.
- The date of the decision.

d) Access conditions

Agencies may give access subject to conditions that ensure the safe custody and proper preservation of the record.

Such conditions may include requiring researchers to provide proof of identity and a requirement that researchers sign an undertaking to preserve the records and not take any action that will alter, harm, destroy or remove from Territory custody any record or any part of the record.

Any conditions should be clear, advised to all those who request access and applied uniformly and fairly.

Agencies are required to maintain a register of records to which a Declaration under Section 28 is in force.

e) Access facilities and services

The University must be able to provide researchers with a reasonable opportunity to inspect original records and may therefore need to provide public access facilities. This is made available to all agencies via the ArchivesACT reading room located at the Woden Public Library.

These facilities are secure, and researchers are supervised when viewing original records to ensure that there is no possibility of theft or tampering. It is a requirement that these facilities must be accessible for people with disabilities. Where access requires the use of some form of technology, this is to be provided as necessary for use within ArchivesACT.

University records are not removed from custody, altered, marked, or amended in any way. To ensure preservation of fragile records users may be asked to wear gloves or take other conservation measures when handling records.

The University must comply with the ACT Public Service Customer Service Standard and Code of Practice when providing access to records.

f) Copying records for researchers.

Depending on the circumstances, researchers may be able to have photocopies of print documents, printouts or disks, or networked access to electronic records, audio or videotapes or other suitable copies. Fees for this service have yet been determined under section 55 of the Territory Records Act 2002.

Researchers will be provided with a scanned copy of the University records required. The copy is to be created in line with the requirements specified in the University Digitisation Program

g) Copyright.

The Territory will generally own copyright in records made by agencies. The maker of the item will normally own copyright in records held but not made by agencies (e.g. letters written by members of the public to agencies).

The provision of copies of records to researchers does not constitute any copyright permission or signing over of any rights in records. This should be made clear to researchers who are provided with copies. Written permission is required from the copyright holder to publish any information from Territory records or any research arising out of access to agency records. It is the responsibility of the person wishing to publish to find and obtain permission from all copyright holders.

h) Cabinet records.

Some records are already available for public access under other legislative arrangements. Part 3A of the *Territory Records Act 2002* allows Cabinet records to be release for public access after 10 years.

OTHER COMPLIANCE INFORMATION

Notification of outsourcing

ACT Government's procurement guidelines are in the Government Procurement Act 2001. This process of notifying the Territory Records Office is a separate legislative requirement.

The University's procedures for outsourcing include the requirement for the University's identified Senior Manager, nominated in Section 1, to inform the Director of Territory Records about any arrangements for outsourcing or internal outsourcing all or any part of its records management.

Procedures specifying this are contained in the University's procedures for Outsourcing.

Examination by Director of Territory Records

The University is committed to providing assistance to the Director of Territory Records to examine the operation of the University's Records Management Program and compliance with the Program. The University's identified Senior Manager, nominated in Section 1, will liaise with the Director of Territory Records to assist with any examination.

Dispute Resolution

Should there be a dispute about whether the University is compliant with the Act or the Records Management Program, the University's identified Senior Manager, nominated in Section 1, will examine the program. This examination will include the following procedures:

- **Step A** Liaise with the Director of Territory records to determine the nature of the dispute.
- **Step B** Examine the relevant section of the *Territory Records Act 2002* that relates to the dispute and examine the Records Management Standards and Guidelines.
- **Step C** Examine the Records Management Program's Policy and Procedures that relate to the nature of the dispute.
- **Step D** Should the examination show that there are inconsistencies between the Records Management Program and the Act/ Standards and Guidelines, the Act and the Standards prevail, and the Universities' Records Management Program will be amended accordingly.
- **Step E** If staff have not adhered to the Policy or Procedures, or there has been an error in the management of the Program, staff are to be counselled in relation to their responsibilities under the program. and
- **Step F** the Director of Territory Records is to be notified of the action taken to resolve the dispute, and the outcome.

Compliance Reporting

The University will report to the Territory Records Office on its record management activities. The identified Senior Manager will be responsible for this reporting to ensure that:

- The University reports to the Director of Territory Records and the Territory Records Advisory Council as required. Reports to the Records Advisory Council may be on such matters as the disposal of records and the preservation of any records that the University may hold about Aboriginal and Torres Strait Islander heritage:
 - Records management performance indicators are incorporated into other areas of the University's business reporting framework.
 - Recordkeeping is a key result in all corporate plans. and
 - Recordkeeping performance is included in the University's Annual Report.

PROGRAM EVALUATION AND REVIEW

Performance measurement and evaluation

The University's identified Senior Manager has responsibility for arranging periodic audits of all aspects of the Procedures to ensure compliance with the rules and practices outlined in them. This monitoring

evaluates the performance of the Records Management Program to determine whether it is meeting corporate objectives and relevant standards.

The University's performance measures include:

- Operational audits
- Auditing compliance with standards and codes of best practice
- Measuring satisfaction of university staff with the service provided by the Registry.

Provision for review of Program.

The University's identified Senior Manager has responsibility to review and replace or amend the Records Management Program on a rolling basis, so that the entire Program is fully reviewed at least every five years.