

ECM Governance Policies

Records Management Policy

Document summary

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

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Purpose

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

Definitions

Term	Definition
Chief Information Officer	“[T]he chief executive officer, or equivalent officer ... or the person who is acting as such”; must “designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records” (Promotion of Access to Information Act, 2000)
Classification	Indicates the level of access applicable to a record; the level of sensitivity associated with the information contained in a record
Disposal	Final stage in the lifecycle of a record: archiving or deletion/destruction
Imaging (Scanning)	The production of an electronic facsimile of a physical record, for Records Management purposes. For the purposes of the present policy, imaging is distinct from “scanning”, as scanning typically involves the retrieval of machine-readable data from a physical document.
Official record	<ul style="list-style-type: none"> Physical or electronic document declared an official record; may not be manipulated or altered without approval from the record owner. Any derivative of or amendment to a declared record is permissible, but the original version of the record must remain unaltered, and retains its status as a declared record. Derivatives and versions may become distinct records in their own right, if it is necessary for them to be declared as such.
PAIA, 2000	Promotion of Access to Information Act, 2000
PASS	Professional, Administrative and Support Staff
POPI, 2013	Protection of Personal Information Act, 2013 (POPI)
Record	<ul style="list-style-type: none"> A physical or electronic document pertaining to the University’s core business, or the business of a specific administrative, support or academic department, office, group or unit, recording processes, actions, transactions, decisions, proceedings, policies or procedures, et al. Minutes of meetings. Documentary evidence of official University business, actions, transactions and policy. ISO 15489 definition: “information created, received, and maintained as evidence and information by organization or person, in pursuance of legal obligations or in the transaction

Term	Definition
	of business”
Record keeper	Designated keeper of records pertaining to or held by a specific PASS or academic department, office, group or unit
Record management	Involves the management of records from their identification, declaration and classification through storage, auditing and distribution, to eventual disposal by archiving or deletion/destruction
Record owner	Designated owner of a collection of records pertaining to or held by a specific PASS or academic department, office, group or unit; not necessarily the owner of the contents of the records, or of the Intellectual Property contained therein.

Applicable to

Types of records: including but not restricted to

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

Storage media

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

Exclusions

- All UCT documents not declared records

Policy summary

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

Policy details

1. **All official UCT records must be managed in a manner compliant with relevant legislation.**
 - 1.1. The University complies with the Promotion of Access to Information Act, 2000 (PAIA).
 - 1.1.1. In accordance with the PAIA records held by the University must be made available following a request to do so from an authorised body or person.
 - 1.2. The University complies with the principles of the Protection of Personal Information Act, 2013 (POPI).
 - 1.2.1. The POPI principles are: Accountability, processing limitation, purpose specification, further processing limitation, information quality, openness, security safeguards, and data subject participation.
 - 1.2.2. Personal information will only be collected for a specific and lawful purpose.
2. **All official UCT records must be subject to a retention schedule compliant with relevant legislation and/or designed to safeguard institutional memory.**

- 3. All official UCT records must be managed in accordance with the records management lifecycle, file plan and retention schedule.**
 - 3.1. All record owners and record keepers must be trained in records management at UCT.
- 4. All official UCT records must be stored or archived in a safe and secure environment.**
 - 4.1. Electronic and physical records must be safeguarded from unauthorised access and manipulation.
 - 4.1.1. All electronic records should have “read-only” status.
 - 4.1.2. Any derivative of or version of a declared record may not alter the original version of the record.
 - 4.2. Electronic and physical records must be safeguarded from accidental or wilful destruction, environmental hazards, and degradation of storage.
 - 4.2.1. Electronic repositories must be backed up off-site.
 - 4.3. Physical records should be imaged and stored in an appropriate electronic repository wherever practical and affordable, with appropriate metadata appended to ensure proper indexing and retrieval, and to reduce handling of physical records.
 - 4.3.1. Imaged records must not be duplicated.
 - 4.3.2. Imaged records must be stored in a repository that meets the common standards and criteria for institution-wide Records Management, with appropriate authorised access.
 - 4.3.3. Electronic imaging and storage can serve as a back-up for fragile physical records, or can be done in order to replace them.
 - 4.3.4. It is recognised that physical facsimiles of records may be more appropriate in some cases.
 - 4.4. For litigation purposes all electronic records must be retained in the original file format.
 - 4.4.1. For example: an email that serves as an official record must be stored in its original email format; a PDF copy of the email will not stand as evidence in a court of law.
- 5. Access to official university records must be logged and monitored.**
 - 5.1. No unauthorised persons may be granted access to physical or electronic records.
 - 5.1.1. Access to electronic records must be in accordance with their classification.
 - 5.2. Access to electronic records must be governed via electronic authentication and access control.
 - 5.3. Physical records may not be removed from the University premises without proper authorisation and approval.
- 6. All official UCT records must have at least the minimum required metadata associated with them, as laid out in the Information Architecture and Metadata Policy, the UCT File Plan and the UCT Records Retention Schedule**
 - 6.1. See the UCT Retention Schedule, File Plan and Information Architecture and Metadata Policy for more information.
- 7. Official record and disposal registers must be implemented and maintained.**

- 7.1. Records must be registered in a compliant record registry and file plan, signed off by the Chief Information Officer, in accordance with Promotion of Access to Information Act, 2000.
- 7.2. A disposal registry must be kept of all records archived or destroyed/deleted, and included in the record register.
- 7.3. A physical records register must include a record location catalogue.
- 8. All official UCT records must have designated owners, accountable for a specific collection or collections of records and their metadata.**
 - 8.1. This accountability must be written into the designated record owner's job description; where this does not happen accountability and responsibility must be assigned to the record owner in writing.
 - 8.1.1. Accountability for records and all it entails must also be detailed and monitored in the Personal Performance System and appraisals.
- 9. All official UCT records must have designated keepers, responsible for archiving and/or filing and classifying them appropriately once they have been identified as records.**
 - 9.1. This responsibility must be written into the designated record keeper's job description; where this does not happen accountability and responsibility must be assigned to the record owner in writing.
 - 9.1.1. Responsibility for records and all it entails must also be detailed and monitored in the staff member's Personal Performance System and appraisals.
- 10. Designated records keepers are responsible for the metadata associated with their records.**
 - 10.1. Records keepers must enter and maintain the required metadata for each record.
 - 10.2. See the File Plan and Information Architecture and Metadata Policy for more information.
- 11. Duplication of records must be avoided wherever possible.**
 - 11.1. Physical documents deemed too fragile to last may be duplicated to ensure the survival of their contents.
 - 11.2. It is recognised that certain circumstances, such as the use of records as legal evidence, may require duplication.
 - 11.2.1. Duplication must be approved by the record owner.
 - 11.2.2. Once the duplicated record has served its purpose it should be destroyed, unless there is a pressing case for its continued existence.
- 12. Facsimiles made of official records may only be identified as official records where the intention of making the facsimiles is to replace the original records.**
- 13. Records may only be altered by a person authorised to do so.**
 - 13.1. Since a record is by definition unalterable any alteration to a record results in a new record. Such an alteration may only be undertaken by a person authorised to do so, upon the approval of an official request to that effect.
 - 13.1.1. Such a request must be logged with the owner of the record.
 - 13.2. The resulting new record should be managed as such, along with its metadata.

14. Official UCT records may only be disposed of by those specifically authorised to do so, in a manner consistent with the record classification and the relevant legislation and policy.

14.1. Disposal may only take place upon the approval of an official request to either archive or delete/destroy a record.

14.1.1. Such a request must be logged with the owner of the record.

14.1.2. The destruction of a record must be logged in the disposal registry (included in the record register).

Policy violations

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

Roles and responsibilities

Roles

<u>Department/ designation</u>	<u>Role</u>
Registrar	<ul style="list-style-type: none"> Chief Information Officer (as designated by the Vice-Chancellor) Records Management Policy owner
Internal Audit	<ul style="list-style-type: none"> Monitoring of compliance with policy
Legal Secretariat	<ul style="list-style-type: none"> Monitoring of legal and statutory compliance requirements
Information and Communication Technology Services (ICTS)	<ul style="list-style-type: none"> Provision of information technology services and maintenance thereof
Properties and Services Department	<ul style="list-style-type: none"> Physical access control Facility maintenance
University Archives	<ul style="list-style-type: none"> Custodianship of records stored in University Archives
Record owner	<ul style="list-style-type: none"> Oversight of a collection or collections of records pertaining to or held by a specific PASS or academic department, office, group or unit Ultimately accountable for the management of such a collection or collections and their retention schedules Not necessarily the owner of the contents of the records Comply with POPI principles as stated above.
Record keeper	<ul style="list-style-type: none"> Designated staff member responsible for the management of records pertaining to or held by a specific PASS or academic department, office, group or unit

Responsibilities

Department/ designation	Responsibility
Registrar	<ul style="list-style-type: none"> • Oversight of records management at UCT • Implementation of Records Management Policy • Designation and control of deputy information officers in accordance with the PAIA, 2000
Internal Audit	<ul style="list-style-type: none"> • Compliance reviews
Information and Communication Technology Services (ICTS)	<ul style="list-style-type: none"> • Server and system maintenance • Maintenance of security and authentication for electronic record management systems • Providing information technology assistance and guidance • Definition of universal standardised file plan
Properties and Services Department	<ul style="list-style-type: none"> • Control of physical access to physical record repositories • Control of environmental hazards at physical record repositories
University Archivist	<ul style="list-style-type: none"> • Day-to-day management of University Archives records • Maintenance and implementation of retention schedule
Record owner	<ul style="list-style-type: none"> • Assigning and managing record keeper • Implementation of record management and retention schedule • Review of retention schedule
Record keeper	<ul style="list-style-type: none"> • Day-to-day management of the records of a specific PASS or academic department, office, group, unit or committee • Maintenance of metadata associated with such records

Related links

- Promotion of Access to Information Act, 2000
<http://www.gov.za/documents/promotion-access-information-act>
- Metadata and Information Architecture Policy
<https://uct.ac.za/media/9452>
- Protection of Personal Information Act, 2013 (POPI)
<http://www.gov.za/documents/protection-personal-information-act>

Appendices

Appendix A – UCT Business Classification System/File Plan

Forthcoming

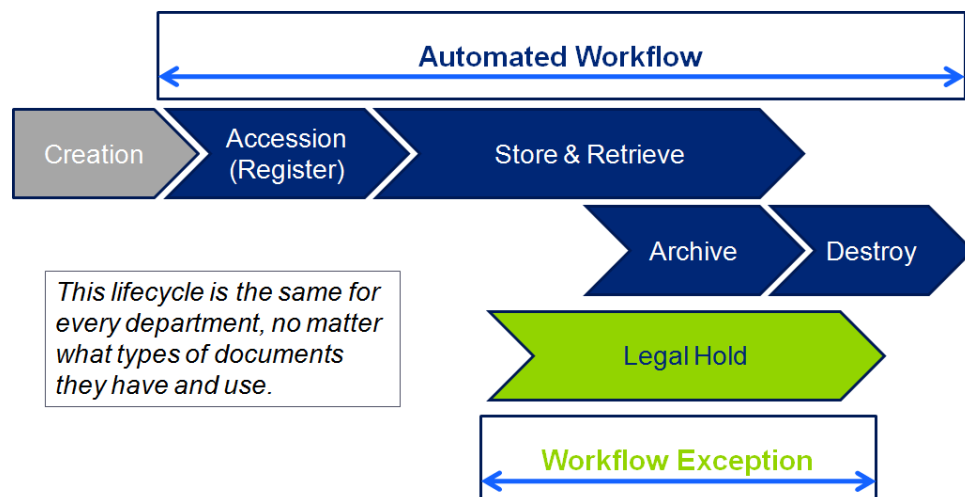
Appendix B – UCT Records Retention Schedule

- Academic administration retention schedule
<https://uct.ac.za/media/9536>
- Retention schedule (general)
<https://uct.ac.za/media/772150>

Appendix C - Record Management Lifecycle

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

See a visual representation of a record management lifecycle below:



Approval and version history

Review period: Every five years

<u>Version</u>	<u>Change type</u>	<u>Amendments</u>	<u>Approved by</u>	<u>Signed</u>	<u>Date</u>
e.g. V1.1	e.g. Major/ Minor change	e.g. Minor change: Changed point 1.2.1 to reflect sign off by the Registrar instead of the Chief Information Officer	e.g. Senate and Council	e.g. Policy owner	e.g. 2011/09/10
V1.1	Minor	Minor change: Added references to POPI: page 2: definitions, page 4: Policy Details point 1.2; page 7: Responsibilities of Record Owner	Registrar's Office (as minor change)	Registrar	2015-09-11
V1.2	Minor	Minor change: Updated links throughout.	Registrar's Office (as minor change)	Registrar's delegate	2026-02-24