

## University Recordkeeping Manual

### PART SEVEN

# Retention and Disposal of University Records

Archives and Records Management Services  
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# UNIVERSITY RECORDKEEPING MANUAL

## Part 7 - Retention and disposal of University Records

### 1. The Regulatory Context

#### 1.1 The NSW State Records Act 1998

The University is subject to the NSW State Records Act 1998 (the Act). The records created by all sections of the University<sup>1</sup> must be managed as State records in accordance with the Act.

The State Records Act established the NSW State Records Authority (generally known as State Records), to administer the Act. The Director of State Records is responsible to the State Records Authority Board.

One of the main functions of the Board is to authorise the disposal of State records. Under section 21(1) of the Act it is an offence to destroy, damage or transfer ownership of State records without authority.

Section 21(2) of the Act established a number of mechanisms for the lawful destruction of State Records. The two most relevant to the University are:

- (a) the disposal of records in accordance with documents known as Disposal Authorities. These are issued by State Records with the approval of the State Records Authority Board; and
- (b) the destruction of records in accordance with what the Act terms Normal Administrative Practice (NAP).

### 2. General Disposal Authorities

The disposal of University records is regulated through the General Disposal Authorities (GDA's) issued by State Records. There are a number of GDA's covering broad functional areas of administration relevant to the University, and one particular GDA for university records. The relevant GDA's current at the time of writing are:

GA28 - Administrative records (revised 2015. Includes financial, accounting and personnel records)

GA33 - Source records that have been migrated

GA45 - Original or source records that have been copied

**GDA23 – University Records**

The full text of the GDAs is available on the web at the State Records site: <http://www.records.nsw.gov.au>. University officers with responsibility for records created in particular functional areas identified in the GDAs should

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<sup>1</sup> See the University [Recordkeeping Policy](#) on the Policy Register for details of the coverage of the Act.

print copies of the relevant Disposal Authority to assist them in managing the records in their custody. For example, Finance Officers should obtain copies of both GDA2 and GDA7. Most academic and administrative areas should also have a copy of GDA23 University Records.

The GDAs identify functions and activities, describe the type of records associated with each, and prescribe a disposal action. In this context, disposal does **not** equate with destruction. Disposal actions range from permanent retention as an archive, to stipulating a minimum period of retention prior to destruction.

### **3. Normal Administrative Practice (NAP)**

There is recognition in the Act that it is not possible to identify and regulate the destruction of all records, particularly those of short term value generated in the usual course of business. Therefore, it is possible to destroy records if it is in accordance with normal administrative practice in the University. This does not mean that almost anything can be destroyed and then claimed to be normal administrative practice. Schedule 3 of the State Records Regulation 2005 sets out some stringent guidelines as to what is, and is not, acceptable as NAP. In addition, State Records has the power to declare particular conduct or procedures to be unacceptable.

The legal destruction of records under NAP does not include actions which are corrupt, fraudulent, or for the purpose of concealing evidence of wrongdoing or for any other improper purpose.

In general, the basis for destruction of records under NAP is that they have no ongoing value to the University, that they do not provide evidence of actions or decisions that must be retained, and/or that the content of the record is recorded or retained elsewhere in the University recordkeeping systems.

Under the Regulation, 'NAP' records are defined below:

- (a) Ephemeral records means records of little value that only need to be kept for a limited or short period of time. Ephemeral records have no continuing value to the organisation and, generally, are only needed for a few hours or a few days.
- (b) Facilitative records means records of little value and of a routine instructional nature that are used to further some activity. Most facilitative records have no continuing value to the organisation and, generally, are only needed for a few hours or a few days.<sup>2</sup>

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<sup>2</sup> *NSW State Records Act 1998*, Schedule 1 Part 1. 2, p.44.

## **4. Retention and disposal of records under NAP**

**4.1 Drafts that must be retained** include those which document significant information that is not contained in the final form of the record. Some examples include:

- Drafts containing significant or substantial changes or annotations, such as a selection committee report circulated for comment and annotation amongst the members of the committee;
- Drafts relating to the formulation of policy and procedure where the draft provides evidence of the processes involved or contain significantly more information than the final version of the record;
- Drafts of legal documents (contracts, tenders etc).

**4.2 Drafts that can be disposed of** are those draft documents or routine working papers used for the preparation of such documents as:

- budgets;
- charts;
- correspondence;
- file notes;
- minutes;
- reports;
- spreadsheets.

### **4.3 Working papers/records**

These are background notes and reference materials used to prepare and complete other documents.

Working papers/records that must not be disposed of include those which document significant information that is not contained in the final form of the record. Schedule 3 of the Regulation provides examples such as:

- Working papers/records of a project officer or investigative officer where the working papers are a substantive record of the project or investigation (that is, they contain substantial and valuable material not found elsewhere).
- Working papers/records may be disposed of when they are primarily facilitative and when the retention of the final version of the document is sufficient to meet the University's recordkeeping requirements or to function as evidence. Some examples:
  - audio recordings of dictated correspondence, conferences and meetings used to prepare correspondence, papers, minutes and transcripts;
  - calculations;
  - Rough notes, including those of meetings and telephone conversations where a formal record has been made.

#### **4.4 Duplicates and published material**

A very large number of records are reproduced and widely distributed within and outside the University. There are also duplicates of material produced outside the University. Where the record is of a type that should properly be placed on a file, or captured electronically, a copy should be retained. For University produced records, the original should be placed on the appropriate file by the originating office. Examples include: memoranda, copies of minutes, newsletters, brochures and other documents sent to all staff, or to particular classes of staff (Deans, HOA's, HOD's etc). Once it is verified that the original is on the official file, all copies can be destroyed.

#### **4.5 Computer support records**

Computer support records which support significant functions of the University and which may be needed as evidence of particular activities, must be retained for the required retention period. A clear example of such records are those that provide audit trails.

#### **4.6 Messages**

Messages include many record formats: email, voice mail, faxes, "Post-it" notes, telephone messages etc. If they have no continuing value, or have been copied on to a relevant file, they may be destroyed.

#### **4.7 Stationery**

Unused stationery may be destroyed when obsolete.

For further guidance on 'NAP' records, contact the Records Disposal Officer in RMS.

### **5. Guidelines for the retention and disposal of locally held records**

The following guidelines are based on the requirements of the General Disposal Authorities issued by State Records. They will provide assistance to University staff in determining the likely retention period of records held in foundations, departments, schools, centres, Faculties, Colleges and some administrative units. The guidelines are not intended to be used by major administrative areas of the University such as Financial Services, Campus Infrastructure and Services or Human Resources staff.

The list is not exhaustive. Should you have any questions regarding the disposal of records please contact the relevant ARMS staff: for permanent records contact the University Archives on ext 12684 and, for other records, contact Records Management Services on ext 13174.

Please note, disposal of official records managed within the University's main recordkeeping systems is only to be conducted by properly authorised staff of Archives and Records Management Services.

### 5.1 Committee Records

Committee records are common throughout the University. Given the importance of committees in the operation of the University, it is important that they be managed properly.

The Minutes of the Senate, Academic Board and their committees are managed by University Secretariat. They are retained permanently as University Archives.

Description	Decision	Disposal Action
1. Master set or records (minutes, agenda, reports, submissions and other meeting papers) of faculties, foundations, boards of studies, committees determining policy or established for strategic planning purposes.	University Archives	Transfer to UA when no longer required for regular reference or after 5 years.
2. Master set of records of other committees	Refer to UA for appraisal	
3. Duplicate copies of minutes	Not required	Destroy when no longer required for reference use.

### 5.2 Collections management

Within the University there are many museums and collections used for teaching and research. The majority of the records related to the management and control of such collections are not required to be kept longer than is necessary for administrative use or reference. The exceptions are records related to the loan of items, both by and from the University collection. Such records must be retained for ten years.

### 5.3 Curriculum Development Records

Working papers created during the development, approval or review of new curricula must be retained for a minimum of three years after the curricula are superseded. This applies to correspondence notes etc, not to committee records which are dealt with above.

Records of any external accreditation of curricula are corporate records and should be managed on University registered files. Such records are required to be retained as University Archives.

#### 5.4 Establishment

Reviews of organisational structure are important University records. Records of reviews and restructuring of major sections of the University (faculties, colleges or administrative divisions) should be documented on registered University files. They are required to be retained as University Archives. The University Archives should be notified of the existence of any records of past reviews that have not been placed on a registered file.

Records of reviews and restructures of sections smaller than a faculty need only be retained for five years after action on the matter is completed.

#### 5.5 Financial and accounting records

The original University records of financial and accounting matters are those managed by various finance departments within the University.

Description	Decision	Disposal Action
1. Local copies of financial and account records (such as monthly management reports)	Not required as archives	Retain until no longer required for reference use, then destroy
2. Petty cash records	“	Retain for 2 years after audit then destroy
3. Postal expense records	“	Retain 2 years after audit then destroy
4. Receipts	“	Retain for 6 years after last action, then destroy

#### 5.6 Marketing

The majority of the records produced as a result of marketing activities need only to be kept for five years after a particular campaign or project ceases. A major exception are master copies of any promotional film, video or CD-ROM. These records are required as University Archives.

Records of marketing activities conducted at the corporate level must be documented on registered University files.

Photographic records of any marketing activities may also be suitable for inclusion in the University Archives. Refer to the University Archives for advice.

## 5.7 Premises

Description	Decision	Disposal Action
1. Records related to routine repairs, maintenance and installation (excluding maintenance/service contracts)	Not required as University Archives	Retain for 2 years after last action then destroy
2. Pest control records	"	Retain for 10 years after last action then destroy
3. Booking registers and other records related to the use of space	"	Retain for 1 year after last action then destroy

## 5.8 Publications by the University

Publications that are not of an ephemeral nature (leaflets, flyers etc.) are required to be retained as University Archives.

Many sections of the University already send multiple copies of journals, newsletters, monographs, annual and other reports to the University Archives (postal address A14) for distribution under the deposit provisions of the Commonwealth and NSW Copyright Acts.

## 5.9 Research

As befits such a significant University function, many records related to research are required to be kept as University Archives. Often these records are not retained at the local level, but are captured into various University systems. Given the complex nature of the retention requirements for research data, questions regarding this issue should be raised with the University Archives.

The retention of research data, however, requires particular attention. Data generated in projects of major national or international significance, interest or controversy or where the principal investigator has a widely acknowledged influence on the area of scholarship and where the data is crucial to the substantiation of the research findings and cannot be readily or practically duplicated, must be retained permanently as University Archives.

Research data generated in projects which are not of major significance, as outlined above, and which have human subjects and potential long term effects are required to be retained a minimum of 15 years. Note that this period may exceed that laid down by some granting bodies such as the NHMRC, but overrides any lesser retention period. In some circumstances significantly longer retention periods may be necessary. Advice should be sought from the University Archives on ext 12684.

Research data generated in projects which are not of major significance, as outlined above, and which have potential long term environmental effects are required to be retained a minimum of 20 years. Note that this period may exceed that laid down by some granting bodies, but overrides any lesser retention period. In some circumstances significantly longer retention periods may be necessary. Advice should be sought from the University Archives on ext 12684.

Research data from other projects which do not have potential long term effects is only required to be retained for five years after the completion of the project.

When research data has been converted to an electronic format by imaging or data entry, the original paper records may be destroyed when no longer needed for administrative or reference use.

All matters related to the retention of research data should be referred to the University Archives on ext 12684.

### 5.10 Staff records

All significant matters relating to staff must be retained on the registered University staff file for each officer. Local copies of some material are maintained in some offices. Such files should be managed in accordance with the University's [Privacy Policy](#) and may be subject to FOI requests, but do not need to be retained once any administrative or reference value has ceased.

See Part 4 of the University [Recordkeeping Manual](#) or more information on staff records.

### 5.11. Stores and Equipment

Description	Decision	Disposal Action
1. Local records relating to stores and minor equipment	Not required as archives	Retain for 2 years after disposal of item, then destroy
2. Local copies of requisitions, orders, invoices etc (where original records are managed by Financial Services and the College Accountants)	"	Retain until no longer needed for reference use, then destroy
3. "Goods inwards" books or records	"	Retain for 6 years after audit, then destroy

## **5.12 Student Assessment Records**

The main database of student results is Sydney Student . The University retains permanently as archives the results of all students. Official transcripts of results are generated by the Student Centre based on the data supplied to it by faculties. Many other records related to students are retained in the University Student File administered by ARMS. Notwithstanding the paramount importance of the centralised recordkeeping systems, academic units generate and accumulate significant records relating to students' progress and these need to be managed appropriately.

Work completed by students for assessment, including essays, assignments, presentations, examination scripts, but not theses, need to be retained for a minimum of six months before being destroyed. .

Copies of theses for higher degrees are retained in the University Library, in accordance with section 89 of the [University of Sydney \(Amendment Act\) Rule 1999](#).

See Part 3 of the University [Recordkeeping Manual](#) for more information about student records.

## **5.13 Student result records**

Although the official results records are those maintained by the Student Centre, academic units will have local records of students' achievements in particular components of a unit of study or course. Such records must be kept for a minimum of one year. Records of changes to assessment results should be attached to the University file of the relevant student.

See Part 3 of the University [Recordkeeping Manual](#) for more information about student records.

## **5.14 Supervision of higher degree and honours students**

Records created in the course of supervising a student must be placed on the University's registered student file.

See Part 3 of the University Recordkeeping Manual for more information about student records.

## **5.15 Teaching**

Most course delivery records retained locally in academic units need only to be retained as long as they are needed for teaching or administrative purposes. This includes course notes, study guides, reading lists, assignments etc. Records relating to teaching policy matters are required as University Archives; however they are captured through committee, Faculty and Academic Board minutes. Copies of Faculty Handbooks are also retained by the University Archives.

## 6. Guidelines for the destruction of locally held records

### 6.1 University Corporate Records

Destruction of records of corporate value must only be carried out following the approval of the Manager, Archives and Records Management Services. In general, records of corporate value are those covered by the General Records Authorities (GDA's) issued by State Records. See Part 2 of the University Recordkeeping Manual for more information about the University's corporate records. **Note: This process does not apply to records managed by RMS.**

In order to seek clearance to destroy large volumes of University corporate records, the form below should be completed and forwarded to the Records Disposal Officer, RMS, A14. The Records Disposal Officer will make a recommendation to the Manager, Archives and Records Management Services regarding the proposed destruction. Where the proposed destruction is in accordance with the GDA's, a copy of the approval signed by the Manager will be returned. The original will be retained on the relevant file in RMS. Should the proposed destruction not be in accordance with the GDA's advice will be given regarding the necessary retention period for the records, and on storage or other appropriate alternatives.

Once clearance for the destruction of University corporate records has been gained contact should be made with CIS to arrange the material to be securely dealt with by logging a WASTE-CONFIDENTIAL service request in [Campus Assist](#).

### 6.2 Destruction of records in accordance with Normal Administrative Practice

The destruction of locally held University records that are not of corporate significance should be authorised by the relevant HOA or HOD. The authorisation should be documented, identifying the records that are to be destroyed (brief description and dates) and the basis for destruction (eg that they are drafts, working papers, duplicates etc). A record of the destruction should be forwarded to RMS to be retained on an appropriate file as evidence of proper records practice.

The destruction of locally held records that are not of corporate significance should be carried out in a timely and regular manner. Rather than allowing more records to accumulate than there is space to store them, an annual cull should be scheduled into office routine.

Destruction of records should be carried out in a manner that is both confidential and environmentally friendly. Almost all University records contain personal information and so great care must be taken to ensure that individuals' privacy is not infringed. The most appropriate mechanism for the destruction of paper-based records is recycling. Confidential material should be disposed of by logging a WASTE-CONFIDENTIAL service request in [Campus Assist](#).

Magnetic media should be erased before being discarded. Particular care should be taken with computer hard discs when old computers are replaced. All data should be removed from the drives to the new system. Simply deleting files does not remove data from a disc, the most secure method to prevent the accidental disclosure of information is to reformat the hard disc.



**REQUEST TO DESTROY UNREGISTERED DOCUMENTS**

Note: Files which have been registered in the University's recordkeeping system **must not be destroyed**.  
Return registered files to Records Management Services when no longer required.

**Description of the documents**

**What subject matter do the documents record?**

- Administration
- Students
- Financial
- Teaching
- Staff
- Other (please specify) \_\_\_\_\_

**Date range of the documents**

**Who owns the documents?**

**Your details**

Name

Email/Telephone number

Department/Office

Date

.....  
**Archives and Records Management Services use**

GDA

Disposal action

Approving officer

Date