MAKERERE UNIVERSITY

RECORDKEEPING POLICY

1. PURPOSE

This Recordkeeping Policy provides the framework to ensure that the University creates, captures and manages its records in a way that supports efficiency and effectiveness in the performance of University functions. This policy will assist the University, and all people performing activities on behalf of the organisation to comply with their obligations under the National Records Act.

2. APPLICATION

- All Makerere University Staff.
- All Makerere University Contractors and Service Providers.
- Organisations performing outsourced services on behalf of Makerere University.
- Volunteers performing duties or services for Makerere University.

This policy applies to all records created or received by any of the above parties during the course of their business on behalf of the University, regardless of format, storage location or date created.

3. EXCEPTIONS

This policy does not extend to areas that have been established as independent legal entities such as associations or companies, eg Technology Consults Ltd. etc.

4. DEFINITIONS

Accountability
The principle that individuals, organisations, and the community are responsible for their actions and may be required to explain them to others (ISO 15489 - International Standards on Records Management).

Appraisal
The process of evaluating business activities to determine which records need to be captured and how long the records need to be kept, to meet business needs, the requirements of organisational accountability and community expectations.

Archival Records
Records that are selected through the appraisal process as having permanent value to Makerere or the wider community (ie must be retained and remain accessible forever). Records that are identified as archival form part of the cultural resources of the University and the Nation.

Disposal Authority
A document approved by the National Records Commission that describes classes of records and defines the minimum periods of time that records must be kept (retention periods) and consequent permitted disposal actions. A disposal authority covers all records created or received by the University regardless of format, location or age.

Disposition
A range of processes associated with implementing records retention, destruction or transfer decisions which are documented in disposal authorities or other instruments.

Ephemeral Records
Records that have short-term value to the University with little or no ongoing administrative, fiscal, legal, evidential, or historical value.

Executive Manager
Means the position held by a Deputy Vice-Chancellor, a University Secretary, a Principal, the Chief Financial Officer or any other position determined from time to time by the Executive Committee to be one that is held by an Executive Manager.

Metadata
Data describing the context, content and structure of records and the use and management of these records through time.

Organisational Unit
A unit formed by the University to undertake prescribed functions, including Academic Organisational Units as defined by the National Council for Higher Education (NCHE).

Record
Recorded information, in any form, including data in computer systems, created or received and maintained by an organisation or a person in the transaction of business or the conduct of affairs and kept as evidence of such activity.

Recordkeeping
The making and maintaining of complete, accurate and reliable evidence of business transactions in the form of recorded information.

Recordkeeping System
An information system which captures, manages and provides access to records through time.

University Record
Any record, irrespective of format, created or received by an individual or group working on behalf of the University as defined under application (Section 2 above) that relates to a business activity of the University.

5. POLICY STATEMENT

Mak's records are valuable corporate assets which are critical to the business of the University and enable responsible decision making, effective policy development, high quality service delivery, accountability and transparency of governance. Mak's records protect the interests of the University as well as the rights of its staff, students and the wider community by providing evidence of actions and decisions in support of the University's functions and operations. Good records are necessary for Mak to keep track of what it has done so that future activities can be planned on the basis of a thorough and accurate knowledge of what has happened and been decided in the past. Mak is committed to recordkeeping practices that ensure the creation, maintenance and protection of records to the University's strategic objectives and facilitate the business of the University whilst meeting legislative needs. This policy provides for recordkeeping practices that will ensure that records with business value are managed efficiently, and that records which have significant ongoing historical or cultural value survive, and can be maintained for permanent retention as University Archives. Records identified as University Archives will be managed in accordance with the University's Archives Management Policy and form part of the cultural resources of Uganda.

5.1 Recordkeeping Roles and Responsibilities

5.1.1 *Vice Chancellor*
The Vice Chancellor has general responsibility for ensuring that appropriate policies and procedures are in place to ensure compliance with best practice recordkeeping standards and legislative requirements under the National Records Act and other relevant legislation.

5.1.2 *Deputy Vice Chancellors,Principals, Executive Managers, Directors and Managers*
Senior staff who have managerial responsibility for organisational areas within the University are to ensure that staff in their area create and keep records as an integral part of their work and in accordance with this policy and associated procedures.

5.1.3 *University Information Management*
University Information Management (UIM) is responsible for the custodianship of the corporate memory of the University. This role includes:
   i.   Development, maintenance and dissemination of policies, procedures and tools to enable all University staff to create, capture, control, secure, protect, make accessible and dispose of records according to business needs and legal requirements
   ii. Provision of advice, training and on-going support for the establishment and maintenance of recordkeeping systems
   iii. Development and periodic review of the Mak's Record Keeping Plan (RKP)
   iv. Promotion of appropriate recordkeeping practices throughout the University through the
   v.   provision of staff training
   vi. Identification, collection, management, preservation and provision of access to the inactive and archival resources of the University
   vii. Implementation of monitoring processes to ensure that this policy is operating effectively

5.1.4 *All University Staff, Contractors & Volunteers*

All individuals and organisations identified in the scope of this policy are responsible for ensuring that records are created and handled in a manner that complies with this policy and the University's RKP. In particular staff must ensure that proper records that document the business transactions and activities in which they take part are created, captured, classified, kept secure, made appropriately accessible and disposed of in accordance with this policy and the supporting procedures.

5.2 Custodianship and Ownership of University Records

Records created by University staff (as identified in the application section of this policy) during the course of University business are owned by the University and as such form part of Mak's corporate assets. During the course of business Mak may enter into contracts or other arrangements where an individual or another organisation is given the responsibility to perform a function or service for the University, or act as the University's agent to deliver services to clients. Records created or received by the individual or organisation while performing the function or service on behalf of the University are owned by Mak and are subject to the provisions set out in this policy. The University will ensure that such individuals or organisations adhere to this policy through the inclusion of appropriate clauses in all relevant contracts entered into by the University. On completion of the contract these records must be transferred to the University as soon as practicable or periodically, during the term of the contract, for longer term contracts.

5.3 Research Data and Materials

Mak has a role in the continuing management of research material and data to facilitate future research, justify the outcomes of the research and protect the rights of researchers and the University should these outcomes be challenged. Therefore, research records will be maintained in accordance with; this Recordkeeping Policy the University Research Management Policy and Australian Code for the Responsible Conduct of Research Department of Education, Employment and Workplace Relations (DEEWR) reporting requirements the University's Intellectual Property Policy and disposed of in accordance with the University Disposal Authority.

5.4 Curtin's Record Keeping Plan (RKP)

Under the *National Records Act* Mak is required to develop and periodically review a Record Keeping Plan (RKP) which details how the University will manage its records from creation to disposition whether that be destruction or permanent retention. Mak will continue to implement and adhere to the requirements of its RKP which is the University's primary means of providing evidence of compliance with the *Act*. As a requirement of the *Act* the University will include a statement of compliance with its RKP each year in its Annual Report.

5.5 Creation of Records

All Mak staff must create full and accurate records which adequately document the business activities in which they take part, including records of significant events and decisions as well as the basis for making those decisions. This may include making file notes of relevant conversations, documenting meetings and keeping records of work processes. These recordkeeping considerations should be incorporated into normal business practice and workflow.

5.6 Capture and Control of Records

All records created or received by staff in the course of University business, irrespective of format, are to be captured into appropriate recordkeeping systems that are managed in accordance with the Records Management Procedures. Records should be captured as soon as possible after creation so that they are readily available to support the University's business. All business applications that store records must be designed to ensure that the integrity of the records and their associated metadata is managed and retained for the retention period of the records contained in the business application. Where a business application is being replaced or superseded by another business application the process of migrating records and all associated metadata from one application to the other must be fully documented to ensure the integrity of the records. Where a business application is to be decommissioned provision must be made for maintenance or transfer of the records so that they remain accessible for the required retention period.

5.7 Security and Protection

Records stored outside corporate information systems are at greater risk of unauthorised access, loss, intentional or accidental alteration or destruction. For that reason staff must ensure that all University records, including highly sensitive or confidential records will be appropriately secured until they can be captured into a University-wide information management system. All records are to be categorised according to their level of sensitivity, adequately secured and protected and maintained in accordance with access, preservation and storage requirements specified in the Records Management Procedures. Where records are required to be taken off campus for business use, including legal or medical purposes, the original records must remain with the University and only copies are to be taken off-site. The only exception to this is where the original records are required to conduct University business and copies will not suffice. Staff using electronic records off-site shall apply appropriate security measures to ensure that the information is not accessed, corrupted, or deleted by unauthorised individuals. All organisational units will ensure that measures are taken to avoid possible damage to records by promoting awareness of their area's disaster recovery plan, by developing local back-up regimes for electronic records where central back-ups are not available and by storing physical records in an appropriately

secure and safe environment as specified in the Records Management Procedures. In the event of a disaster affecting records the RAO is to be notified as soon as possible so that they can provide assistance in assessing and addressing any damage to the records.

5.8 Access

The University encourages the sharing of information assets to ensure organisational effectiveness. University staff will be provided with access to University records in order to effectively carry out their activities. However, where there are confidentiality or privacy requirements, access may be restricted to particular staff positions or organisational units according to business and legislative requirements.

5.8.1 *Public Access to Current Records*

Records of the University that are considered to be in the public domain, such as most committee minutes, official publications and press releases, may be freely accessed by the public. Minutes of some committees, such as the Finance Committee, are subject to particular access restrictions and can only be released with permission from the Executive Officer of the creating committee. Public access to other University records will only be granted in accordance with the Disclosure of Personal Information procedure, the Confidentiality of University Counselling Records Policy or the *Access to Information Act.*

5.8.2 *Public Access to Archival Records*

The University is not legally obliged to provide access to University records that are less than 25 years old. Application for access to these records should be made through the *Freedom of Information Act* via Legal Services. General access to non restricted archival records that are between 25 and 75 years of age shall be granted except in cases where:

- The information contained in the record relates to an individual's medical condition or disability and this information cannot be presented in such a way as to obscure the identity of the individual
- The record contains sensitive personal information relating to an individual and providing access to the record will breach other legislation
- Providing access to the record may result in a threat to the security of the University or the safety of its staff or students
- Access to the record would, in the opinion of the University Archivist, put the record at risk of physical damage or destruction. In this case access to the information but not the physical object will be provided.

General access to non restricted archival records that are over 75 years old must be granted unless, in the opinion of the National Records Commission, the record contains 'exceptionally sensitive.

5.9 Disposal

All University records must be disposed of in accordance with the appropriate current General Disposal Authorities (GDA) or University Disposal Authority (UDA) which have been approved by the National Records Commission. Disposal actions include destruction, transfer of custody or permanent retention of records, including the migration or transmission of records between recordkeeping systems and the transfer of custody or ownership of records. No records may be destroyed without prior authorisation from the University Archivist, in accordance with Records Management Procedures, with the exception of ephemeral material. Where records are not covered by a current GDA or UDA no disposal action can be taken. In such cases records will be appraised according to their evidential, administrative and research value by the University Archivist in conjunction with the area responsible for creating or receiving the information. A new disposal class will be created or an existing class amended where required and submitted to the National Records Commission for approval. Once approval has been granted disposal can take place. Records documenting the disposal of University records will be maintained as University Archives.

5.10 Records Training Program

University Information Management will provide appropriate training and advice to staff to enable them to meet their responsibilities as outlined in the policy and in accordance with the requirements of the RKP.

6. OBJECTIVES

6.1.1 To ensure that complete and accurate records of Mak's business activities and functions are created and captured as efficiently and effectively as possible so that they can be accessed when required
6.1.2 To assist all staff at all levels to create and maintain records pertaining to the functions, processes, activities and transactions of the University they take part in
6.1.3 To establish recordkeeping as a routine administrative activity with adequate resourcing to support activities that aim to improve recordkeeping practices
6.1.4 To ensure that Mak is able to demonstrate that due process has been followed in its actions and decisions through the existence of its records
6.1.5 To ensure records are identified, protected and kept secure according to their value
6.1.6 To ensure access to records is provided in line with organisational needs and relevant legislation
6.1.7 To capture and preserve records of permanent value to the University and the State as archives.