'Tertiary Education Records Management Policies and Document Environments'

by

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Submitted to the School of Information Management,
Victoria University of Wellington
in partial fulfilment of the requirements for the degree of
Master of Information Studies

October 2019

Abstract

Research problem: The Public Records Act (2005) is designed to ensure open access to and the preservation of information and records, while Archives New Zealand's *Information and records management standard* (2016) stipulates that public sector organisations including tertiary education institutions must conduct the management of their information and records by means of strategy and policy. As some publicly funded New Zealand tertiary education institutions (TEIs) have chosen to utilise their official websites to communicate these organisational policies with stakeholders and the general public an opportunity exists to study aspects of this phenomenon. This research, then, examines the state of document environments found on individual TEI websites and the contents of the records and information management policies themselves with respect to issues of compliance and comprehensiveness.

Methodology: This research was conducted using a content analysis approach. This approach is the research design best suited to analysing primary (textual) documents such as were gathered for the purpose of this study.

Results: Policy hubs were often found wanting in several aspects, especially when viewed in relation to the level of detail present in and degree of compliance exhibited by many of the records and management policies themselves. Furthermore, in terms of the TEI sector as a whole, while the universities outperformed other TEIs in some areas, there were occasions equally when the reverse held true especially with respect to the content and form of the policies.

Implications: The mandatory and increasingly intricate nature of the relationship between Archives New Zealand and the TEI records management sector is reflected, in part, by the contents of organisational records and information management policies. An outline of the state of open access TEI records management policies provides the basis for a better understanding of the success (or otherwise) of this relationship and generates a crucial means of context for future research and developments.

Keywords: Records and Information Management Policies – Records and Information Management Standards – Archives New Zealand – Public Records Act 2005 – Tertiary Education Institution – Policy Hub

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1 Problem statement

1.1 Rationale for the study

The Public Records Act (2005) (henceforth, PRA) is designed to ensure open access to and the preservation of information and records. In turn, Archives New Zealand's *Information and records management standard* (2016), issued under Section 27 of the PRA by the Chief Archivist, stipulates that public sector organisations must conduct the management of their information and records by means of strategy and policy. These public sector organisations, as defined in Section 4 of the PRA, comprise local authorities, including regional councils, territorial authorities, and council-controlled organisations, as well as public offices, including district health boards, state and integrated schools, and tertiary institutions.

Existing literature examines variously the impact the PRA and associated mandatory standards have had on information and records management in areas such as the practices of public service departments (Pengelly, 2016), council-controlled organisations (King, 2013), and public sector recordkeepers (Currie, 2011). This research, however, does not explore in any significant detail the information and records management policies themselves nor does it consider every type of public sector organisation subject to the PRA. Accordingly, a research gap in the literature exists not only with respect to examining information and records management policies (via content analysis) but also to broadening the scope of previous studies to include other public sectors, in this case tertiary education.

Publicly funded New Zealand tertiary education institutions (TEIs) regularly utilise their official websites to communicate with stakeholders and the general public. A noteworthy component of this communication in several instances is the provision of organisational documents, including policies, procedures, guidelines, statutes, and frameworks. The degree,

however, to which TEIs make these documents publicly available varies considerably. This variance perhaps stems from the fact that the open provision of these documents is not compulsory or regulated. In other words, it is at the discretion of individual institutions to select those organisational documents they wish to communicate openly with stakeholders and the general public.

By employing a content analysis approach this study proposes to examine those organisational documents found on New Zealand TEI websites in three related areas. First, it aims to gauge the state of document environments (or policy hubs) found on individual websites and to observe how they are designed and store documents. Second, it aims to examine in more detail a specific sub-set of documents present within these policy hubs, namely: records and information management policies. Third, it aims to determine the extent to which these publicly available policies adhere to the PRA and any associated standards issued under that Act, in particular Archives New Zealand's *Information and records management standard* (2016b). Finally, this study will summarise the findings of these three related areas in a series of TEI organisational capsules.

1.2   Research objective

The main objective of this study is to provide an up-to-date and comprehensive overview of the state of publicly available information and records management policies found on the websites of TEIs. It seeks to analyse the form and structure of the policies, to determine the nature of the environments in which they appear, and to gauge the ostensible level of their regulatory compliance with the PRA and associated mandatory standards.

The results of this examination will add to the growing LIS literature and body of knowledge based around the PRA. Moreover, it is hoped the results of this study will prove to be of

some value to those engaged in information-based areas, such as recordkeeping and policy, and will constitute a useful resource for the present and provide a benchmark for future comparison and study.

1.3 Research questions

The primary questions this study aims to answer are:

- What is the nature of organisational document environments or policy hubs on TEI websites?

- What is the current state of (publicly available) online information and records management policies on TEI websites?

- To what extent do these information and records management policies comply with the PRA and associated standards?

- Do any significant differences/similarities exist within the target group in terms of the document environments and/or information and records management policies?

- If so, what significance do these differences/similarities hold?

1.4 Theoretical framework and considerations

In some respects, the theoretical framework for this research resembles a grounded theory study in that the data collected will play the most significant part in developing a theory (Leedy & Ormrod, 2015). Nevertheless, certain considerations inform a theoretical framework of sorts from the outset:

- Content analysis – this research will be conducted in the belief that content analysis is a viable and effective means to frame the evidence;

- Creation – this research will be conducted in the belief that the organisations which comprise the population of the study do in fact create information and records

(whether through the continuum or lifecycle models) in the course of their regular business;

- Compliance – this research will proceed under the assumption that the organisations which comprise the population of the study are, at the least, aware of the mandated and legal requirements for compliance with the PRA and any associated standards.

1.5 Definitions of terms

Accountability: "Principle that individuals and organisations are responsible for their actions and may be required to explain them to others" (Archives New Zealand, 2018e).

Archives New Zealand: "Means the repository referred to in section 9 [of the Public Records Act 2005]" (Archives New Zealand, 2018e).

Compliance: "The use of the term 'must' and standards are used as a means to ensure compliance with legislation but do not prevent the use of alternative methods, provided it meets the specified criteria" (Archives New Zealand, 2018e).

Information and records management policy: "A statement of intent for managing corporate information and records appropriately. It shows that the organisation is committed to a successful information and records management programme – one that complies and is reliable, systematic and well managed" (Archives New Zealand, 2018d).

Record: "Means information, whether in its original form or otherwise, including (without limitation) a document, a signature, a seal, text, images, sound, speech, or data compiled, recorded, or stored" (Archives New Zealand, 2018e).

Records management: "Field of management responsible for the efficient and systematic control of the creation, receipt, maintenance, use and disposition of records, including processes for capturing and maintaining evidence of and information about business activities and transactions in the form of records" (International Organization for Standardization, 2016, 3.15).

Tertiary education institution (TEI): "Tertiary institutions (for example, colleges of education, polytechnics, specialist colleges, universities, or wananga) that are bodies corporate established under the Education Act 1989 (Crown Entities Act, 2004, s7).

1.6   Delimitations and limitations

Time constraints and the potential for overreach in scope necessitated the delimitation of the research sample to a specific sub-group –TEIs– at the expense of others, including local government authorities (a regional council or territorial authority as per Local Government Act, 2002, s5) and district health boards (an organisation established as per New Zealand Public Health and Disability Act, 2000, s19).

Time constraints also necessitated the delimitation of looking only at records and information management policies in detail and not any other documents, even if they are closely related and focused on information.

Finally, the fact that not all TEIs make their records and information policies publicly available was an inherent limitation of the research, albeit one in accord with the chosen design and methodology.

2 Literature review

The literature reviewed for this research constitutes four main areas. First, literature outlining the PRA and other legislation pertinent to information and records, including the Official Information Act 1982 and the Privacy Act 1993. Second, literature pertaining to the roles of the Chief Archivist and Archives New Zealand in enforcing the PRA and associated mandatory standards. Third, literature examining in more detail Archives New Zealand's *Information and records management standard* (2016). Fourth, literature dealing with information and records management policies in general.

2.1 Legislation

2.1.1 Official Information Act 1982

The Official Information Act (OIA) 1982 came into force 1 July 1983 and in turn repealed the Official Secrets Act (OSA) 1951. The OSA was designed to control or restrict access to official information and, indeed, even made the wrongful communication of official information an offence (OSA 1951, s. 6). The OIA, on the other hand, was designed to:

- make official information more freely available;

- provide for proper access by each person to official information relating to that person;

- protect official information to the extent consistent with the public interest and the preservation of personal privacy; and

- establish procedures for the achievement of those purposes.

In effect, the OIA was the first in a series of legislation that have helped shape public recordkeeping in New Zealand (Hitchcock, 2014; Pengelly, 2016). Indeed, as Richards and Donnelly (1996) noted not long after the OIA's enactment, the success of this legislation

would require information management techniques to adapt by better identifying those occasions when information should be made available or should be protected (p. 253).

2.1.2 Privacy Act 1993

Ten years after the OIA was enacted the Privacy Act (PA) 1993 came into force on 1 July 1993, and together these pieces of legislation became cornerstones of the government's information management policies (Meehan, 1996). Unlike the OIA, however, the PA was designed to promote and protect the private information of the individual as opposed to official information (Schroff, 2005). In particular, the PA established certain guidelines and principles regulating how public (and private) sector agencies were to collect, use, and disclose information relating to an individual and how an individual might be able to access this information or ensure its security.

Furthermore, the PA's mandate to protect an individual's private information situates this legislation firmly within the scope of a public agency's information and records management policies. An example of this can be seen in principle 9 of the PA which covers the retention of personal information and states that "agencies must not retain personal information for longer than is required for the purposes for which the information may lawfully be used" (Privacy Act, 1993). Indeed, the (New Zealand) Law Commission, even though it is of the opinion that principle 9 is very broad, agrees it is an important principle that will prompt agencies to consider their retention and, ultimately, disposal practises (Law Commission, 2011).

2.1.3 Public Records Act 2005

Twelve years after the PA was enacted the PRA came into force on the 21 April 2005. The PRA, a new piece of legislation rather than a replacement for an existing statute, centres on supporting the following three areas (State Services Commission, 2011):

- the effective management of records in the public sector;

- the recordkeeping practices of public offices and local authorities; and

- the long-term preservation of public archives.

In particular, the PRA requires every public office and local authority to create and maintain full and accurate records and to maintain in an accessible form all public records in their control (s. 17[1]). The public offices covered by the PRA include government departments, crown entities, crown research institutes, state enterprises, district health boards, tertiary institutions, and state schools, while the local authorities covered include all regional councils and territorial authorities, council controlled organisations and trading organisations, and local government organisations, as defined by section 5(1) of the Local Government Act 2002.

If then, the OIA and PA can be said, in general, to govern the handling of official and private information respectively, then the PRA can be said to represent the culmination of a process begun by the OIA and PA in that it furthers the mandates of government accountability (central and local) found in the OIA and protects the rights for individuals to access information found in the PA (for a similar line of reasoning, see Pengelly, 2016).

2.2 The Chief Archivist and Archives New Zealand

The PRA contains two additional features especially important to the scope of this study: the administrative provisions for the continuation of Archives New Zealand (Te Rua Mahara o te Kāwanatanga) (s. 9[1]) and for the office of Chief Archivist (s. 10[1-2]), the two bodies directly responsible for the information and records management standard(s) applicable to public offices.

A key function of the Chief Archivist, as outlined in the PRA, is the issue of standards in relation to public records (s. 27). The Chief Archivist must state, in connection with any such standards, the public offices, repositories, or local authorities to which the standard applies and whether compliance is mandatory or discretionary. It is the task of Archives New Zealand, through the Chief Archivist, to publish these standards, thereby adopting a regulatory stance aimed at ensuring compliance to the PRA.

In order to execute this regulatory role and foster improved information and recordkeeping management, Archives New Zealand makes all standards and related materials publicly available on its website (Archives New Zealand, n.d.). At present, there are no fewer than 51 such resources available: standards (1), guides (12), forms (5), factsheets (25), statements (2), supplements (6). While several of these documents will inform this study, for example Archives New Zealand's *Information and records management strategy* (Archives New Zealand, 2016c) and *Information and records management policy development* (Archives New Zealand, 2018d), the document of most significance is their sole standard: *Information and records management standard* (Archives New Zealand, 2016b).

2.3 *Information and records management standard* 2016

2.3.1 Background to the standard

Within the first five years of the PRA, Archives New Zealand issued seven recordkeeping standards for the public sector. As per Currie (2011), four of these standards were mandatory, while three were discretionary (p. 1):

- S2: Storage standard (June 2007) – mandatory;
- S7: Create and maintain recordkeeping standard (June 2008) – mandatory;
- S8: Electronic recordkeeping metadata standard (June 2008) – mandatory;

- S9: Disposal standard (November 2010) – mandatory;

- S4: Access standard (August 2006) – discretionary;

- S5: Digital recordkeeping standard (November 2010) – discretionary;

- S6: Digitisation standard (January 2007) – discretionary.

In 2014, however, Archives New Zealand issued the *Records management standard for the New Zealand public sector* (2014), a document which was derived from and subsequently replaced the four mandatory standards listed above.

After a period of two years, the publication of the *Information and records management standard* (2016) in July 2016 not only replaced Archives New Zealand's *Records management standard for the New Zealand public sector* (2014) but also two of the three earlier discretionary standards: *Access standard* (2006) and *Digital recordkeeping standard* (2010). The third discretionary standard, *Digitisation standard* (2007), had already been subsumed in 2012 by the AS/NZ ISO 13028: 2012, *Information and documentation – Implementation Guidelines for digitization of records*, which, in turn, the *Information and records management standard* (2016) also replaced.

2.3.2 Contents of the standard

Archives New Zealand's *Information and records management standard* (2016) comprises eleven pages. Its sub-title makes clear the compulsory nature of the standard: "A mandatory standard issued under Section 27 of the Public Records Act 2005 by the Chief Archivist" (p. 1), while in section 1.2, the standard explicitly states those organisations to which the standard applies:

- public offices, including state and integrated schools, and

- local authorities, including council-controlled organisations.

In terms of the specific requirements for compliance, the standard is structured around three principles (pp. 6-11), the first of which is particularly pertinent to this study and literature review.

The first principle of Archives New Zealand's *Information and records management standard* (2016) makes it clear that organisations are responsible for managing their own information and records (p. 6). A key premise of this principle is that a governance framework is necessary for the effective and productive management of information and records. Of particular note is the principle's minimum compliance requirement 1.1 which insists upon the use of regularly reviewed strategies and policies: "Information and records management must be directed by strategy and policy, and reviewed and monitored regularly" (p. 6).

That an organisation should follow standards with respect to their recordkeeping is not a new concept (see, for example, Carlisle, 2008; Oliver, 2011; Hitchcock, 2014) nor is the recommendation to adopt a formally agreed upon policy (see, for example, Shepherd & Yeo, 2003, who cite ISO 15489 in this regard). Nonetheless, the mandate of minimum compliance requirement 1.1 is significant in that it supports the reasonable premise that a New Zealand public office, including but not limited to TEIs, local government, and district health boards, possesses (or ought to possess), in some form or another, an information and records management policy.

2.4   Analysis of information and records managements policies

Most studies on recordkeeping and recordkeeping standards in New Zealand and abroad focus on aspects other than the information and records managements policies themselves. In a New Zealand context, for example, Pengelly (2016) has analysed the impact of the PRA

with respect to public service departments, Hitchcock (2014) the relationship(s) between trust in recordkeeping and compliance to the PRA, while Currie (2011) the value of Archives New Zealand's standards with respect to public sector recordkeepers. Similarly, in an international context, while various studies have touched upon information and records management policies in the course of broader research (Joseph, Debowski, & Goldschmidt, 2012; Bakare, Abioye, & Issa, 2016; Nyathi & Dewah, 2017; Shepherd, Stevenson, & Flinn, 2011a, 2011b), there is again little, if any, analysis of the policies themselves.

Despite the paucity of comparable studies, appropriate literature nevertheless exists to recommend the viability and value of analysing the information and records management policies found on TEI websites. In terms of policies, for example, Oczkowski et al. (2018) carried out a methodical and productive document analysis of institutional policies, protocols, and other documents relating to organ donation in Canadian intensive care units. In terms of utilising (public sector) websites for research purposes, Tomkies (1999) successfully studied New Zealand local authority websites with respect to the Local Government Official Information and Meetings Act (1987), while Cullen, O'Connor, and Veritt (2003) systematically evaluated local government websites in New Zealand. Furthermore, Rapley and Jenkings (2011), in their treatment of discourse analysis, note that websites (along with other documentary sources) are an underused and under-analysed resource in the social sciences.

3   Research design and methodology

This research was conducted using a content analysis approach (Leedy & Ormrod, 2015). This approach was the research design best suited to analysing primary (textual) documents such as were gathered for the purpose of this study (Rapley & Jenkings, 2010).

3.1   Research population

The research population for this study consisted of the 27 publicly funded TEIs currently in New Zealand as per Education Counts' directory of tertiary providers (https://www.educationcounts.govt.nz/data-services/directories/list-of-tertiary-providers). Of these 27 TEIs, 16 were classed as polytechnics, eight as universities, and three as wānanga. As part of their online portfolios, each institution promotes and maintains official websites:

TEI	Website address	Institution type
Ara Institute of Canterbury	http://www.ara.ac.nz	Polytechnic
Eastern Institute of Technology	http://www.eit.ac.nz	Polytechnic
Manukau Institute of Technology	http://www.manukau.ac.nz	Polytechnic
Nelson Marlborough Institute of Technology	http://www.nmit.ac.nz	Polytechnic
NorthTec	http://www.northtec.ac.nz	Polytechnic
Open Polytechnic	http://www.openpolytechnic.ac.nz	Polytechnic
Otago Polytechnic	https://www.op.ac.nz/	Polytechnic
Southern Institute of Technology	http://www.sit.ac.nz	Polytechnic
Tai Poutini Polytechnic	http://www.tpp.ac.nz	Polytechnic
Toi Ohomai Institute of Technology	https://toiohomai.ac.nz/	Polytechnic
Unitec Institute of Technology	http://www.unitec.ac.nz	Polytechnic
Universal College of Learning	http://www.ucol.ac.nz	Polytechnic
Waikato Institute of Technology	http://www.wintec.ac.nz	Polytechnic
Wellington Institute of Technology	http://www.weltec.ac.nz	Polytechnic
Western Institute of Technology at Taranaki	http://www.witt.ac.nz	Polytechnic
Whitireia	http://www.whitireia.ac.nz	Polytechnic
Auckland University of Technology	http://www.aut.ac.nz	University
Lincoln University	http://www.lincoln.ac.nz	University
Massey University	http://www.massey.ac.nz	University
University of Auckland	http://www.auckland.ac.nz	University
University of Canterbury	http://www.canterbury.ac.nz	University
University of Otago	http://www.otago.ac.nz	University
University of Waikato	http://www.waikato.ac.nz	University
Victoria University of Wellington	http://www.vuw.ac.nz	University

Te Wānanga o Aotearoa	http://www.twoa.ac.nz	Wānanga
Te Wānanga o Raukawa	https://www.wananga.com/	Wānanga
Te Whāre Wananga o Awanuiārangi	http://www.wananga.ac.nz	Wānanga

Table 1: TEI website addresses and institution type

At the time of writing, the above website links for each TEI were valid and working. It is worth noting, however, that in Education Counts' directory (latest update October 2019) the web address listed for Otago Polytechnic was http://www.tekotago.ac.nz rather than https://www.op.ac.nz/ and for Te Wānanga o Raukawa it was http://www.twor.ac.nz rather than https://www.wananga.com/. In both of these cases, the web address as listed by Education Counts was invalid and not working.

3.2 Data collection

Data for this study were collected from the 27 TEI websites and comprised two phases: (1) the detection and categorisation of document environments or policy hubs and (2) the identification and categorisation of records and information management policies found within these hubs. Data were collected and checked up until August 2019 after which point, no new data were admitted.

3.2.1 TEI document environments

The detection and categorisation of document environments or policy hubs involved the systematic use of internal search functions, as well as the manual navigation of the TEI websites. After an organisational policy hub was located, the steps required to locate the hub were recorded and its various elements were catalogued. In turn, these details were organised and coded in an effort to help establish an overall picture of the state policy hubs on TEI websites.

3.2.2   Records and information management policies

Those documents on TEI websites subsequently identified as records and information management policies were downloaded in PDF or word document format (if available), while web-based policies were captured, and their contents transcribed. Basic details such as title, length, and date were recorded at this point (Oczkowski et al., 2018). No documents were subsequently replaced or revised during the course of data collection.

3.3   Ethical considerations

Approval from the School of Information Management's Human Ethics Committee (HEC) will not be needed for the data collection of information and documents as the research does not involve any human subjects and is a matter of public record.

3.4   Data analysis

The analysis of the collected data, in accordance with established quantitative, qualitative, and content analysis methods (Leedy & Ormrod, 2015; Oczkowski et al., 2018), comprised three phases: (1) analysis of TEI websites in relation to their document environments, (2) analysis of TEI records and information management policies, and (3) analysis of TEI records and information management policies with respect to the legislative compliance.

4   Analysis of TEI websites and document environments

4.1   Customised checklist for websites and document environments

Content analysis of the TEI websites and document environments involved the use of a customised checklist similar to those designed for testing the usability of library websites by Raward (2001) and others (Le, 2006, Mohamadesmaeil & Koohbanani, 2012). The design of this checklist remained flexible throughout the collection, analysis, and coding of data and

ultimately comprised two categories, seven sub-categories and a total of 28 questions. The

final checklist is shown below in Table 2.

Category one: Finding the document environment/policy hub

1.1 Findability	Fully	No	Partial
1 Link to policies on home page			
2 Search tool present			
3 Relevant search results for policy/polices			
4 Site map present together with entry for policies			

Category two: Organisational documents/policy section(s)/page(s)

2.1 Contents and structure	Fully	No	Partial
5 Description of purpose			
6 Target audience(s) stated			
7 Sorted by category			
8 Search tool included			
9 Index or means to sort documents			

2.2 Currency of information	Fully	No	Partial
10 Date of last page update indicated			
11 New document(s) indicated			
12 Document(s) under revision/review indicated			

2.3 Comments and help	Fully	No	Partial
13 Provision to ask questions or make comments			
14 Invitation to make comments about the policies			
15 Dedicated 'help' section, FAQs, or similar			

2.4 Responsibility for environment/page(s)	Fully	No	Partial
16 Clear responsibility for document environment/page(s)			
17 Specific contact details			

2.5 Presentation and layout	Fully	No	Partial
18 Clear document entries/links			
19 Clear menu(s)			
20 Clear breadcrumb trail			

		Fully	No	Partial
21	Link back to home page			
2.6 Document particulars		**Fully**	**No**	**Partial**
22	Clear and accurate title			
23	Date(s) external to documents indicated			
24	Description of document			
25	Type of document indicated			
26	PDF or word document download			
27	Working and valid link			
28	Size of file indicated			

Table 2: Customised checklist template for TEI websites and document environments

It was determined, following the collection (and coding) of data and a series of test runs, that a more nuanced approach than a simple binary scale better represented the absolute and relative state of the TEI websites and document environments. As a result, rather than the dichotomous scales of existent and non-existent (Yes/No), this checklist employed a three-point scale throughout (2, 1, 0) with the distribution set at 'Fully = 2', 'Partial = 1' and 'No = 0' (Liang, 2007). Accordingly, the aggregate scores from the customised checklist were out of a total of 56.

4.2   Aggregate checklist scores

Twenty-one of the 27 TEIs –seven universities and 14 polytechnics– possessed document environments or policy hubs sufficient for content analysis and the application of the customised checklist: Ara Institute of Canterbury (Ara), Eastern Institute of Technology (EIT), Lincoln University (Lincoln), Manukau Institute of Technology (MIT Manakau), Massey University (Massey), Nelson Marlborough Institute of Technology (NMIT), NorthTec, Otago Polytechnic, Southern Institute of Technology (SIT), Tai Poutini Polytechnic (TPP), Toi Ohomai Institute of Technology (Toi Ohomai), Unitec Institute of Technology (Unitec), Universal College of Learning (UCOL), University of Auckland

(Auckland), University of Canterbury (Canterbury), University of Otago (Otago), University of Waikato (Waikato), Victoria University of Wellington (Victoria), Waikato Institute of Technology (Wintec), Wellington Institute of Technology (WelTec), and Western Institute of Technology at Taranaki (WITT).

The aggregate scores that resulted from the customised checklist for the policy hubs of these 21 TEIs are shown below in Table 3.

TEI Policy Hubs - Aggregate Checklist Scores
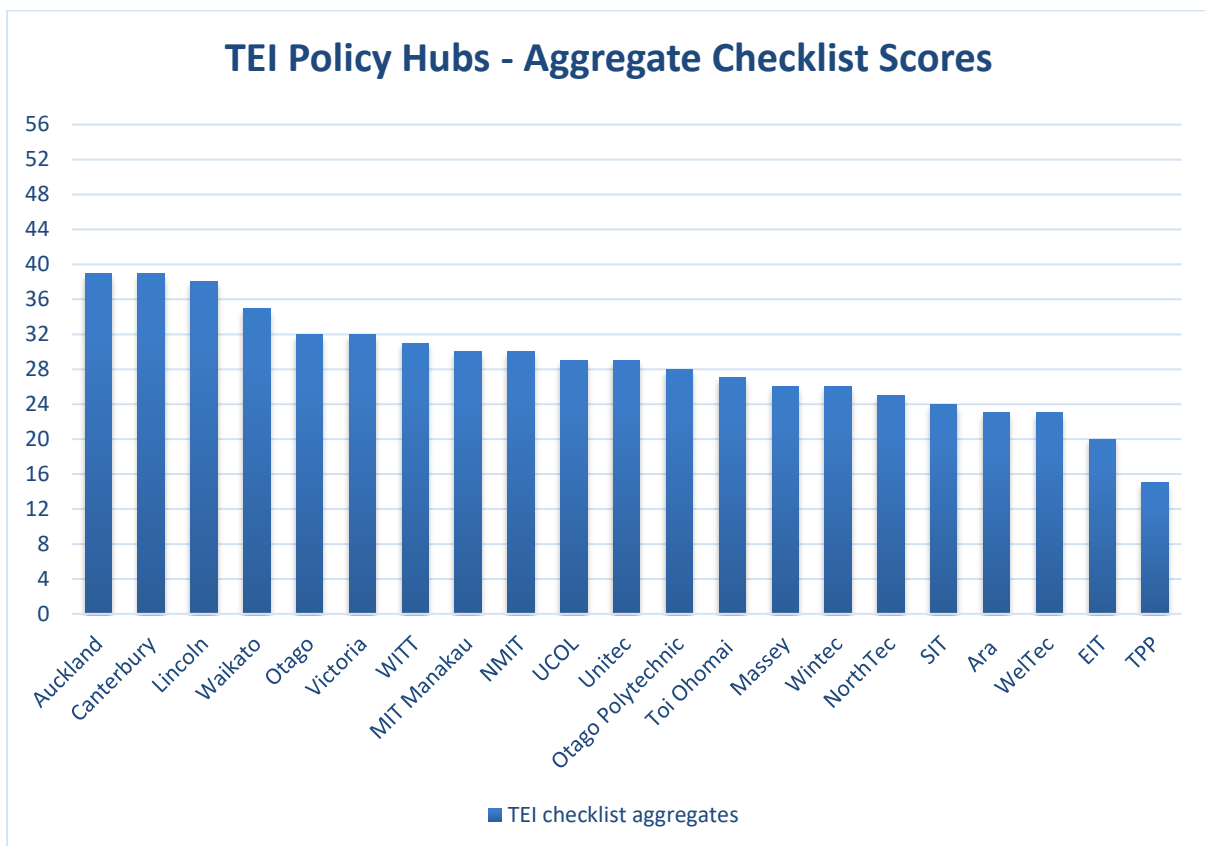
Table 3: TEI policy hub checklist aggregates

Auckland and Canterbury scored the equal highest aggregate (39/56 = 70%), while TPP scored the lowest (15/56 = 27%). The top six spots were occupied by universities, perhaps reflecting greater resources, while WITT was the highest ranked polytechnic (31/56 = 55%). The mean average for all TEIs was 28.7 (= 51%).

4.3 Analyses of overall sub-category scores

For the purpose of analysis, the individual sub-category scores of the customised checklists are shown below in Table 4. The sub-category scores were calculated as a percentage by totalling the potential score for each sub-category per question (42) and dividing this figure by the coded TEI total. This percentage-based figure provides an expedient overview of how the TEI-sector as a whole satisfies a given sub-category, while also allowing individual points of interest to be addressed in the analysis.
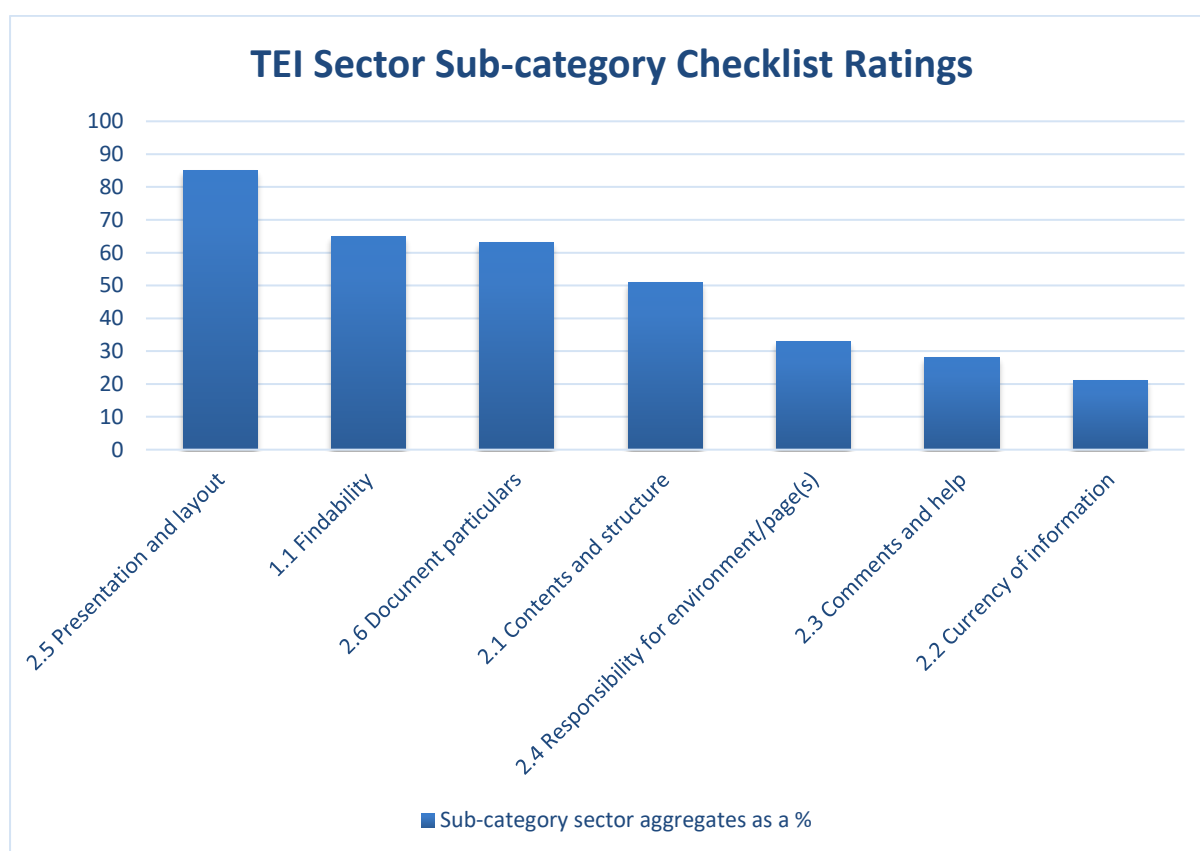
Table 4: TEI sector sub-category checklist aggregates as a %

4.3.1 Sub-category 2.5 – Presentation and layout

The presentation and layout of the document environments consisted of four questions (18-21) and was the highest rated sub-category among the TEIs (142/168 = 85%). Each TEI document environment, with the exception of TPP, fully satisfied the requirements for clear document links (40/42 = 95%), while the weakest areas within this sub-category were the

clarity of the document environment menus (31/42 = 74%) and the precision of the

breadcrumb trail as a navigation aid (33/42 = 79%). Individually, TPP (0/8 = 0%) and

Victoria (4/8 = 50%) were the only TEIs not to score 67% or higher.

4.3.2   Sub-category 1.1 – Findability

The ability for the user to locate an online document environment or policy hub consisted of

four questions (1-4) and was the second highest rated sub-category among the TEIs (109/168

= 65%). However, direct (or, even, indirect) links to document environments present on the

front page of a TEI website rated only 57% (24/42), while those instances where a website

possessed a site-map index complete with an entry for a document environment occurred on

only six occasions at a much lower rate of 29% (12/42). Indeed, the overall rating for this

sub-category (109/168 = 65%) is inflated to a degree by the scores returned for the presence

of an internal search tool (42/42 = 100%) – a figure which, when the quality and relevance of

search results are taken into consideration (31/42 = 74%), is diminished somewhat.

Individually, Massey, NMIT, Toi Ohomai, and WelTec returned the lowest scores (3/8 =

38%), while Auckland, NorthTec, SIT, and WITT the highest (8/8 = 100%).

4.3.3   Sub-category 2.6 – Document particulars

The presence and presentation of document particulars within the document environment

consisted of seven questions (22-28) and was the third highest rated sub-category among the

TEIs (184/294 = 63%). Within this sub-category there was a noticeable division between the

upper and lower ratings: Questions 23, 24, 28 rated on average 24% (30/126), while 22, 25,

26, and 27 rated on average 92% (154/168). Specifically, in terms of the lower ratings

Question 23 –inclusion of date(s) external to document– occurred only in the cases of Otago

University, Toi Ohomai, and Victoria (3/42 = 7%; all partially), Question 24 –description of a

document– occurred on only eight occasions (14/42 = 33%; six fully, 2 partially), while

Question 28 –size of document file indicated– occurred on only seven occasions (13/42 =

31%; six fully, 1 partially). In contrast, the lowest scored question among the upper ratings (Question 26–PDF or word document download) averaged 86% (36/42). Individually, Massey, Otago Polytechnic, and SIT rated the lowest for this sub-category (6/12 = 50%), while Canterbury, NMIT, and Unitec rated the highest (12/12, = 100%).

4.3.4   Sub-category 2.1 – Contents and structure

The contents and structure of the document environment consisted of five questions (5-9) and was the fourth ranked sub-category at 51% (107/210). Similar to the sub-category for document particulars, there was a noticeable division between the upper and lower ratings within this sub-category: Questions 5, 6, 7 rated on average 67% (84/126), while 8 and 9 rated on average 27% (23/84). Question 8 concerned the presence of a dedicated policy search tool and Question 9 an index or other means to sort the policies. In the case of these two questions, however, seven of the TEIs (EIT, MIT Manakau, NorthTec, SIT, Unitec, WelTec, and Wintec) had document environments consisting of only one (or two) pages. Accordingly, a dedicated search tool and/or an index or other means to sort the policies might be considered redundant or unreasonable. In that event, removing Questions 8 and 9 from consideration for the seven TEIs with limited policy hubs produced combined adjusted average ratings of 41% (23/56) for these two questions as opposed to 27% (23/84) and 59% (107/182) for this sub-category overall as opposed to 51% (107/210). Individually, and discounting those TEIs with document environments consisting of only one (or two) pages, Auckland and Canterbury rated the highest for this sub-category (10/10, = 100%), while TPP the lowest (1/10, = 10%).

4.3.5   Sub-category 2.4 – Responsibility for environment/page(s)

The clarification of who is responsible for the document environment and the provision of specific contact details consisted of two questions (16-17) and was the fifth ranked sub-category at 33% (28/84). The most noteworthy trend for this sub-category was the disparity

between the collective performance of the universities (20/28 = 71%) and the rest of the TEIs (8/56 = 14%). Individually, Auckland, Canterbury, Lincoln, SIT, and Waikato all rated 100% (4/4), while Ara, EIT, NMIT, NorthTec, Otago Polytechnic, Otago, Toi Ohomai, TPP, Wintec, and WelTec all rated 0% (0/4).

4.3.6   Sub-category 2.3 – Comments and help

The provision to make comments and ask for dedicated help with respect to the document environment consisted of three questions (13-15) and was the sixth ranked sub-category at 28% (35/116). All three questions rated poorly across the sector, but especially Question 15 (regarding a dedicated 'help' section or similar) which returned an average rating of 5% (2/42), with Lincoln being the only environment to include such a section. Individually, only Lincoln rated 100% (6/6), while Ara, EIT, Manakau MIT, SIT, Toi Ohomai, TPP, Unitec, and Wintec all rated 0% (0/6).

4.3.7   Sub-category 2.2 – Currency of information

Details relating to the currency of information consisted of three questions (10-12) and was the seventh and lowest rated sub-category at 21% (27/126). Each question and the sector as a whole rated poorly, with the exceptions of Lincoln (5/6 = 83%), Otago (4/6 = 67%), and Waikato (5/6 = 83%). There was, however, a noticeable disparity between the collective performance of the universities (18/42, = 43%) and the rest of the TEIs (9/84, 11%).

4.4   Discussion

This content analysis identified 21 document environments or policy hubs on official TEI websites (seven universities and 14 polytechnics). This analysis involved the application of a customised checklist to these document environments in order to assess various elements of usability and features of content. This checklist comprised two main categories ('Finding the document environment/policy hub' and 'Organisational documents/policy

section[s]/page[s]') and identified seven sub-categories: findability, contents and structure, currency of information, comments and help, responsibility for environment/page(s), presentation and layout, and document particulars. As a whole, the mean average (out of 56) for all TEIs was 28.7 (= 51%), while universities averaged 34.4 (= 61%) and polytechnics 25.7 (46%).

Several notable themes resulted from the questions within the sub-categories and suggested areas for improvement. First, in terms of findability the TEI websites in general did not have or elected not to provide a clear and easy means of access to the document environments. Links to policy hubs on the front page of a website were infrequent (57%), functioning and complete site-maps rare (29%), and internal search results were disappointingly inconsistent (74%). Second, in terms of the document particulars, there was a distinct lack of descriptive text accompanying the documents (33%), in effect reducing some of the hubs to lists of semi-organised hypertext, as well as a virtually collective disinterest in supplying any relevant dates external to the documents (7%), thus constraining the conveyance of key and current information. Third, in terms of the content and structure, regardless of whether one includes TEIs with document environments consisting of only one (or two) pages, there was a general lack of a dedicated search tool, index, or some other means to sort documents (41%). This deficiency created undue problems in the case of those hubs that encompassed numerous menus, pages, and sub-pages and comprised dozens if not hundreds of documents. Finally, in terms of comments and help there was a general disinclination from the TEIs to provide the means necessary for the user to make comments or receive dedicated help with respect to the document environments (28%). In this area, Lincoln's approach to comments and help should be viewed as paradigmatic. Indeed, there exists scope for further research to examine and compare model features and elements of such environments, especially since on every occasion at least one TEI satisfied the requirement fully.

On two occasions there was a noticeable divergence between the results of universities and the other TEIs. First, in terms of responsibilities, universities generally provided a clear indication of responsibility for document environment/page(s) together with specific contact details (71%). The rest of the TEIs, on the other hand, rated considerably lower for this sub-category (14%). Second, in terms of the currency of information, while neither group fared particularly well, there was nevertheless a noticeable disparity between the collective performance of the universities (43%) and the others (9/84, 11%). Further research needs to be done to determine and articulate more fully the differences and nuances that exist between university and polytechnic document environments within the TEI sector.

5 Analysis of TEI records and information management policies

5.1 Overview of TEI records and information management policies

Among the twenty-one document environments (or policy hubs), a total of ten records and information management policies were present. The particulars of these documents are shown below in Table 5.

TEI	Title of policy	Date approved	Date last review	Date next review	Length (pages)	Format
Ara	Information and Records management	14 August 2007	15 May 2018	15 May 2021	7	PDF
Auckland	Records management	July 2014	n/a	July 2019	3	Web-based
Canterbury	Records management	September 2013	November 2015	November 2018 (currently under review)	11	PDF
Lincoln	Records management	n/a	13 September 2018	13 September 2020	7	PDF
Massey	Information and records management	7 March 2007	October 2017	October 2020	11	PDF

NMIT	Records management	20 August 2012	16 March 2018	16 March 2019	7	PDF
Otago	Records management	31 May 2011	31 July 2015	31 July 2020	8	Web-based
UCOL	Recordkeeping	29 May 2013	December 2015	Annually	6	PDF
Victoria	Records management	5 March 2009	19 July 2013; effective 13 August 2013	13 August 2016	5	PDF
Waikato	Records management	n/a	July 2014	July 2019	3	PDF

Table 5: TEI records and information management policies overview

Three points need to be made with respect to the above policies. First, it should be noted that five of the policies are past or in the process of their scheduled review date(s): Auckland, Canterbury, UCOL, Victoria, and Waikato. Second, and perhaps more pertinent, six of the policies have been authorised or reviewed at a date which precedes the publication of Archives New Zealand's *Information and records management standard* (2016). The impact of this chronology has been noted when and where relevant to this study. Third, Ara's records management policy (CPP114) makes frequent reference to an attached policy implementation guide (CPP114a) that is not, in fact, present nor is it available from or in Ara's policy hub. In particular, CPP114a purportedly outlines records management procedures and requirements and responsibilities for staff all aimed at compliance with mandatory records and information standards. While no attempt has been made to mitigate the absence of CPP114a, the potential impact of this missing guide has been noted when and where relevant.

5.2 Composition of TEI records and information management policies

Preliminary analysis to determine the composition of the TEI records and information management policies consisted of two steps.

First, an initial phase of document analysis was used in order to identify a set of discrete elements within the gathered documents, including scope, responsibilities, legal compliance, and definitions. Second, a subsequent phase of qualitative content analysis was used to code the textual data within these elements in order to produce, in plain language, a register of concise yet meaningful themes and sub-themes (Rapley & Jenkings, 2010, Oczkowski et al., 2018). The data and findings of these analyses are presented in tabular form and analysed with the aid of descriptive statistics where applicable.

5.3   TEI policy elements overview

Analysis of the 10 policies revealed seven primary and recurrent discrete elements. The designations and frequencies of these elements are shown in Table 6.
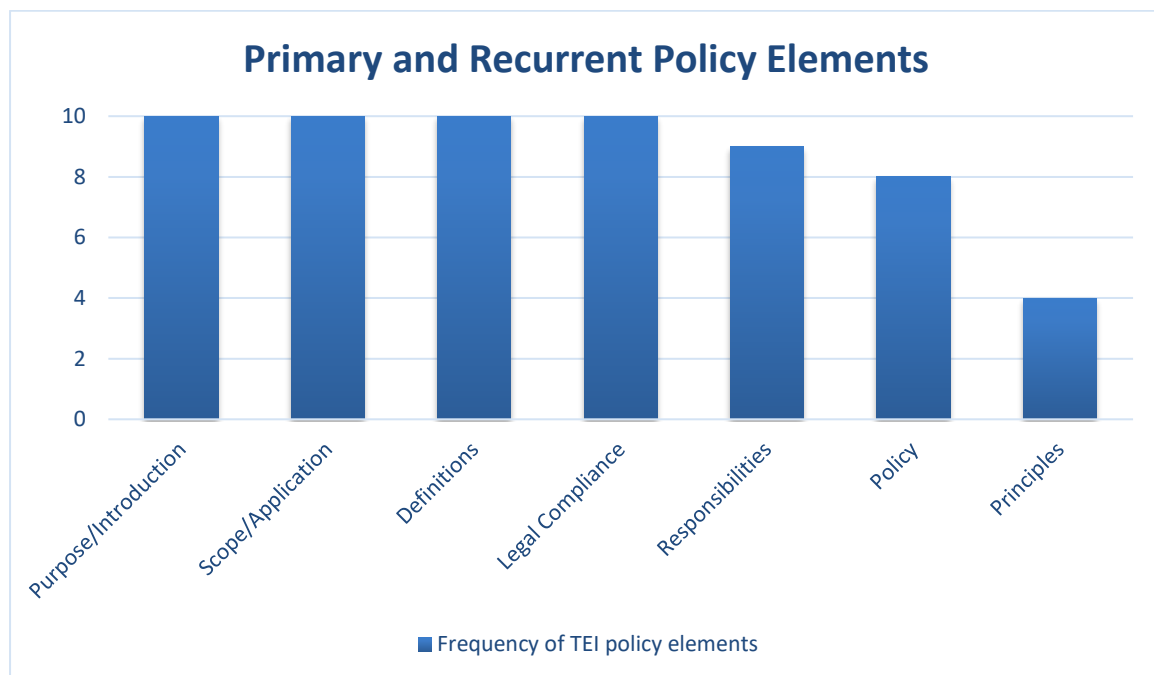
Table 6: Frequency of TEI records management policy elements

Among the seven primary elements, four ('Purpose/Introduction', 'Scope/Application', 'Definitions', 'Legal Compliance') are present in all 10 policies (n = 10, 100%), two ('Responsibilities', 'Related Documents') are present in nine (n = 9, 90%), while one ('Policy') is present in eight (n = 8, 80%). It is worth noting, however, that 'Responsibilities'

would most likely have been present in all 10 policies if Ara's CPP114a had accompanied the records management policy as indicated. Moreover, there is a degree of overlap between the contents of the eight 'Policy' and four 'Principles' elements, especially in the cases of NMIT and UCOL whose policies contain a 'Policy' as well as a 'Principles' element.

5.4 Policy element – 'Purpose/Introduction'

All 10 policies contained a 'Purpose' or 'Introduction'. In eight instances (n = 8, 80%) this element was titled 'Purpose', in one (Canterbury, n = 1, 10%) it was 'Introduction', while in another (Ara, n = 1, 10%) 'Purpose' but occurred in a sub-section of the 'Introduction'. Document analysis of these 'Purpose/Introduction' elements revealed eight principal and recurrent themes.
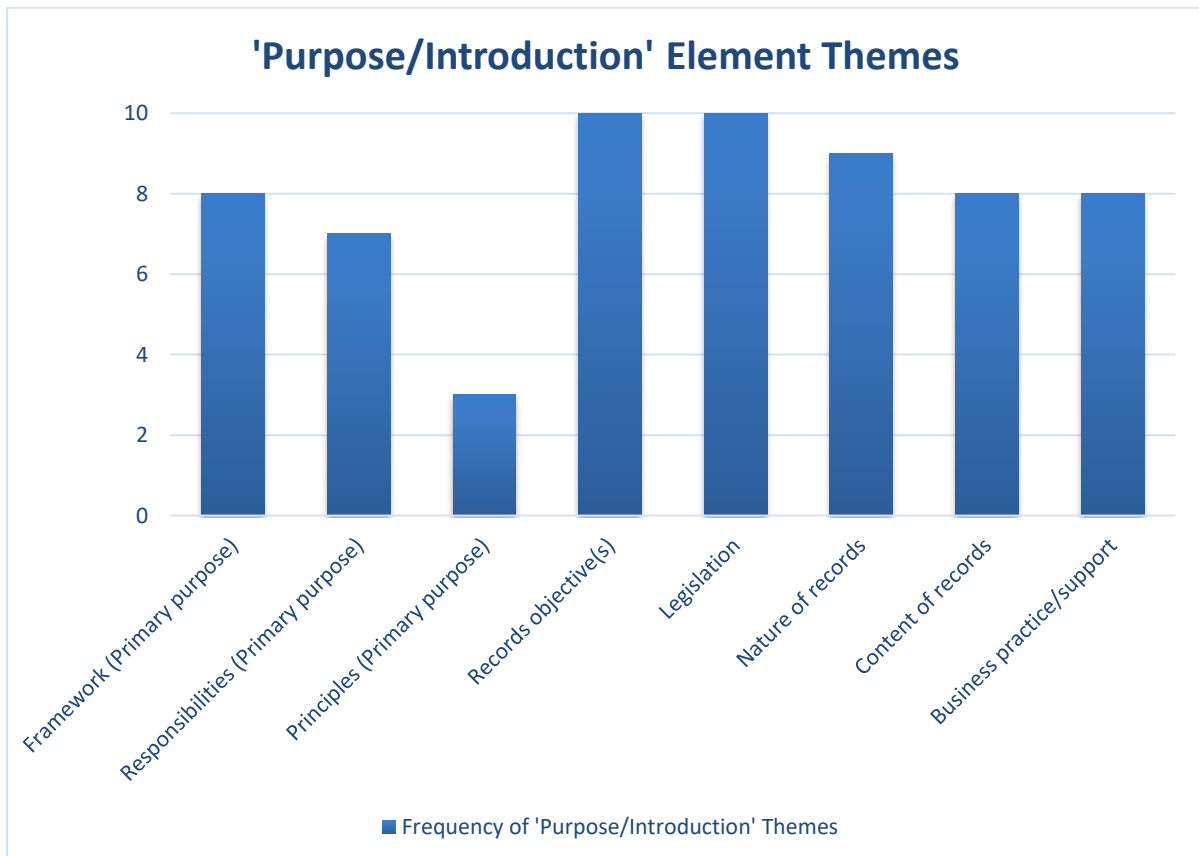
Table 7: 'Purpose/Introduction' element themes

5.4.1   Themes one to three: Primary purpose(s)

Among the 10 'Purpose/Introduction' elements three primary purpose themes emerged: establishing a framework (or approach) to records management, assigning records management responsibilities (or accountabilities), and outlining records management principles. The frequency and distribution of these themes are shown below in Table 8.

TEI	Primary purpose(s) theme	Category
Ara	Establish principles of information and records management	Principles
Auckland	Ensure defined and consistent approach to recordkeeping	Framework
Canterbury	Provide records management framework	Framework
	Assign records management responsibilities	Responsibilities
Lincoln	Outline principles that govern records management	Principles
Massey	Provide records management framework	Framework
	Establish records management responsibilities	Responsibilities
	Establish records management principles	Principles
NMIT	Provide records management framework	Framework
	Assign records management responsibilities	Responsibilities
Otago	Establish records management framework	Framework
	Outline records management responsibilities	Responsibilities
UCOL	Provide records management framework	Framework
	Assign records management responsibilities	Responsibilities
Victoria	Provide records management framework;	Framework
	Assign records management responsibilities	Responsibilities
Waikato	Set out records management framework	Framework
	Establish records management responsibilities and accountabilities	Responsibilities
	Set out records management principles	Principles

Table 8: Frequency and distribution of primary purpose(s) theme

Three policies (Auckland, Ara, and Lincoln, n = 3, 30%) contained one primary purpose theme, five (Canterbury, NMIT, Otago, UCOL, and Victoria, n = 5, 50%) contained two, while two contained three (Massey and Waikato, n = 2, 20%). The most frequent theme (n = 8, 80%) was establishing a framework or approach to records management, with assigning

responsibilities second (n = 7, 70%) and principles third (n = 4, 40%). The prevalence of establishing a records management framework and assigning responsibilities in these 'Purpose/Introduction' elements accords with Archives New Zealand's advice to include both in the purpose section of a records management policy (2006).

5.4.2   Theme four: Records objective(s)

Among the 10 'Purpose/Introduction' elements the theme of records objective(s) emerged. The frequency and distribution of this theme are shown below in Table 9.

TEI	Records objective(s)								
Ara	Create	Manage							
Auckland	Make		Maintain						
Canterbury	Create		Maintain			Dispose			
Lincoln	Create		Maintain	Make accessible	Store	Dispose	Use		
Massey		Manage	Maintain						
NMIT	Create	Manage	Maintain					Classify	
Otago	Create		Maintain	Make accessible	Store	Legally dispose			Capture
UCOL	Create	Manage	Maintain	Make accessible	Store	Dispose			
Victoria	Create		Maintain	Access		Dispose			
Waikato		Manage							

Table 9: Frequency and distribution of records objective(s) theme

Each policy stated at least one objective, with three policies (n = 3, 30%) having stated as many as six. These objectives are active in nature and concern aspects of what can be viewed as the life cycle of records. There are 36 discrete instances of the records objectives theme in the 'Purpose/Introduction' elements, the majority of which centre on the sub-themes of creation and maintenance (n = 16, 44%), but also concern such areas as access (n = 4, 11%) and disposal (n = 5, 14%). Admittedly, while a degree of overlap (or, even, redundancy)

could be said to exist between the objectives 'Manage' and 'Maintain', the occurrence of both terms in three of five occasions 'Manage' occurs suggests a deliberate nuance. In either event, the desire to emphasise at least one aspect of the life cycle objectives of records in the 'Purpose/Introduction' elements is a feature universally present in the 10 policies.

5.4.3 Theme five: Legislation/Legislative requirements

Among the 10 'Purpose/Introduction' elements the theme of the legislation/legislative requirements emerged. The frequency and distribution of this theme are shown below in Table 10.

TEI	Legislation/Legislative requirements
Ara	Public Records Act requirements
Auckland	Legislative requirements
Canterbury	Statutory requirements
Lincoln	Legislative requirements
Massey	Legislative requirements
NMIT	In accordance with the NZ Government's authorised retention and disposal schedule
Otago	Legislative requirements
UCOL	Legislative requirements
Victoria	Legal needs
Waikato	Legislative requirements

Table 10: Frequency and distribution of legislation/legislative requirements theme

Each document emphasised one aspect of the legislative or statutory requirements with respect to records management, though only one policy (Ara, n = 1, 10%) mentioned specific legislation. Nevertheless, the overall legal emphasis found in the 10 'Purpose/Introduction' elements reflects well both the mandatory requirements of the PRA 2005 (and associated legislation) and the strong recommendation for records management policies to place emphasis on legislative requirements found in Archives New Zealand documentation (2006, 2008, 2018d).

5.4.4   Theme six: Nature of records

Among the 10 'Purpose/Introduction' elements the theme of the nature of records emerged.

The frequency and distribution of this theme are shown below in Table 11.

TEI	Nature of records
Auckland	Full and accurate
ARA	Full and accurate
Lincoln	Full and accurate
Canterbury	Full and accurate
NMIT	Full and accurate
Otago	Full and accurate
UCOL	Full and accurate
Victoria	Full and accurate
Massey	---------------------
Waikato	Full and accurate

Table 11: Frequency and distribution of nature of records theme

The nature of records theme, which outlined the ideal nature or condition(s) of records, appeared in nine of the policies (n = 9, 90%). Besides the near consensus among the policies to emphasise the nature of the records in the Purpose/Introduction' elements, there was complete agreement with respect to the utilisation of the essentially formulaic phrase 'full and accurate'. The prevalence of this phrase no doubt reflects the self-same terminology used in the PRA (s. 4, s. 17), as well as various Archives New Zealand publications (2006, 2014, 2018d). It is worth noting also that, in the case of Massey, while there is no mention of full and accurate records in the policy purpose (or indeed, the use of any adjectival modifiers for records), the phrase is repeated three times elsewhere in the document.

5.4.5   Theme seven: Content of records

Among the 10 'Purpose/Introduction' elements the theme of the content of records emerged.

The frequency and distribution of this theme are shown below in Table 12.

TEI	Content of records
ARA	Business decisions and transactions
Auckland	Transactions and official activities
Canterbury	Business activities
Lincoln	Vital business transactions
Massey	---
NMIT	Activities
Otago	Activities
UCOL	Business activities
Victoria	Business activities
Waikato	---

Table 12: Frequency and distribution of content of records theme

Eight (n = 8, 80%) of the documents indicated, to varying degrees of specificity, the core content or substance of the records. In those instances where the content of records is mentioned the preferred term is 'activities' (n = 6, 75%), followed by 'transactions' (n = 3, 37.5%) and 'decisions' (n = 1, 12.5%). In addition, these terms are paired with the attributive noun 'business' on five occasions (n = 5, 62.5%), the adjectival modifier 'official' on one (n = 1, 12.5%), 'vital' on another (n = 1, 12.5%), and presented without modifiers on two (n = 2, 25%). On those two occasions when the theme of 'activities' is used without a modifier in the 'Purpose/Introduction' element, on one (NMIT) the emphasis on business with respect to the substance of records occurs elsewhere in the policy ('business activities') while on the other (Otago) the simple use of 'activities' is maintained throughout. Moreover, in the cases of Massey and Waikato, where there is no mention of the content of records in the 'Purpose/Introduction' element, the theme is articulated elsewhere in both policies ('business activities and decisions', Massey; 'business transactions', Waikato). The importance of appraising business activities within a records management framework in order to define key information requirements is a core concept underlying *Principle 2* of Archives New

Zealand's information and records management standard and accompanying implementation guide (2016b, 2018).

5.4.6 Theme eight: Business practice/support

Among the 10 'Purpose/Introduction' elements the theme of business practice/support emerged. The frequency and distribution of this theme are shown below in Table 13.

TEI	Business practice/support
Ara	Supports business of organisation
Auckland	In accordance with good, prudent business practice
Canterbury	Meets business needs
Lincoln	Meets requirements of best business practice
Massey	Meets best practice and business requirements
NMIT	Supports organisational functions and accountabilities
Otago	--
UCOL	Meets business requirements
Victoria	Supports operational needs
Waikato	--

Table 13: Frequency and distribution of business practice/support theme

Eight (n = 8, 80%) of the documents outlined at least one aspect of organisational business with respect to records or records management. There perhaps exists a subtle, even if circular, difference in agency between those policies that claim effective records management supports business practice or needs (Ara, Canterbury, NMIT, Victoria) and those policies that claim records management will be established in accordance with or meet business practice (Auckland, Lincoln, Massey, UCOL). The degree of any difference, however, is reduced when Ara, Canterbury, NMIT, Massey and UCOL emphasise elsewhere in the policies that effective recordkeeping principles underlie good business practice, while Otago emphasises that records management will be conducted or established in accordance with normal prudent business practice. In either event, this dichotomy of agency is nevertheless reflected in the

PRA which emphasises the management of records in accordance with normal prudent business practice (s. 17[1]) and in Archives New Zealand's documentation which tends to emphasise the role records or records management play in supporting the business of the organisation (2006, 2016b).

5.5   Policy element – 'Scope/Application'

Each of the 10 policies contained a 'Scope' or 'Application' element. In four instances (Lincoln, Canterbury, NMIT, UCOL, n = 4, 40%) this element was titled 'Scope', in two (Otago, Victoria, n = 2, 20%) 'Organisational Scope', in two (Auckland, Waikato, n = 2, 20%) 'Application', while in the others it was titled 'Scope and Application' (Ara, n = 1, 10%) and 'Audience' (Massey, n =1, 10%). Document analysis of these 'Scope/Application' elements revealed three principal and recurrent themes.
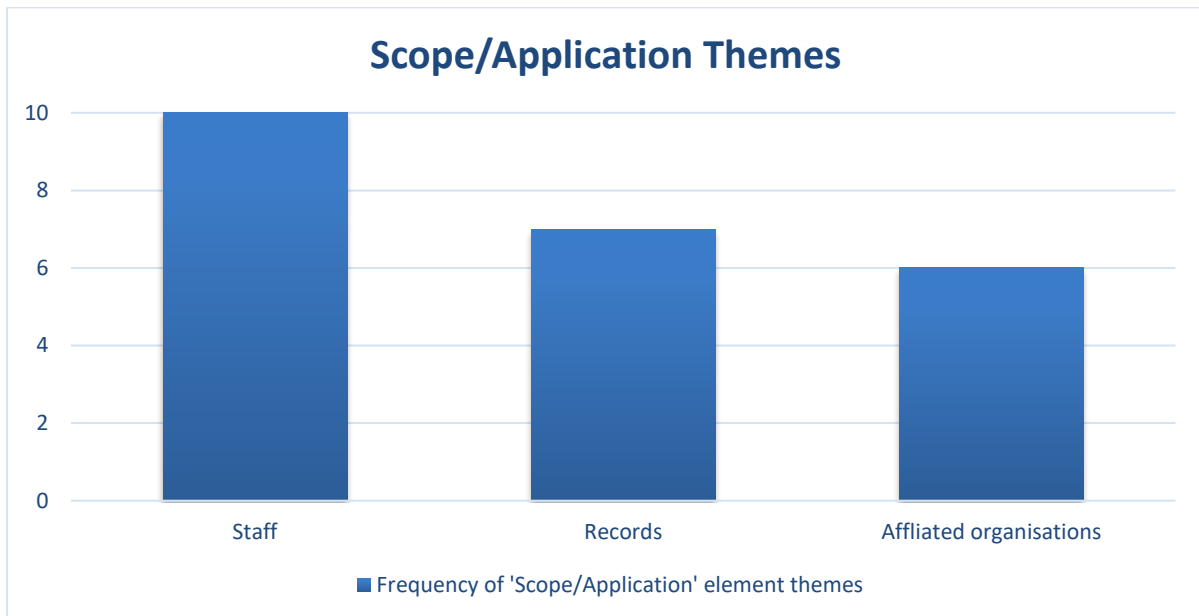
Table 14: 'Scope/Application' element themes

5.5.1   Theme one: Staff

Among the 10 'Scope/Application' elements the theme of staff emerged. The particulars of this theme are shown below in Table 15.

TEI	Staff theme particulars
Ara	All staff at Ara, including full and part-time permanent, temporary and contracting staff.
Auckland	All staff members of the University.
Canterbury	All staff at the University, including full and part time permanent, temporary and contracting staff.
Lincoln	All staff members of the University. Consultants and contractors performing work on behalf of the University must also comply with this policy.
Massey	Academic and professional staff; volunteers and independent contractors.
NMIT	This policy applies to all staff of NMIT, whether permanent or temporary, including contractors and volunteers.
Otago	All University of Otago staff, including contracted persons.
UCOL	All staff of UCOL, including full and part-time permanent, temporary and contracting staff, council members and volunteers.
Victoria	All staff, permanent or temporary; contractors and volunteers.
Waikato	All staff of the University of Waikato.

Table 15: Particulars of staff theme

All of the documents (n = 10, 100%) addressed sections of staff in the 'Scope/Application'

element and stated to whom the policy applies. Nine of the documents (n = 9, 90%)

specifically mentioned 'all staff', while five (n = 5, 50%) also specified part-time or

temporary staff members. In the case of Massey, which elected to limit its scope to academic

and professional staff, specific emphasis on all organisational staff was made elsewhere in the

policy. Furthermore, eight of the documents (n = 8, 80%) specifically mentioned contracted

staff, while on those occasions when contracted staff were not mentioned in the

'Scope/Application' element Waikato emphasised this group elsewhere while Auckland did

not. The address to all staff is a basic recommendation for a records management policy

scope (Archives New Zealand, 2006, 2018c, 2018d), while the inclusion of contracted staff is

a clear directive from Archives New Zealand (2014, 2018c, 2018d).

5.5.2 Theme two: Records

Among the 10 'Scope/Application' elements the theme of records emerged. The particulars of this theme are shown below in Table 16.

TEI	Records theme particulars
Ara	All physical and digital information and records, regardless of format or media, created, received and managed by Ara in the conduct of its business by staff and affiliated organisations or businesses.
Auckland	---
Canterbury	All records, regardless of format or media, created, received and managed by the University in the conduct of its business by staff and affiliated organisations or businesses. Note: emails are a form of electronic record.
Lincoln	Any record in any format created, received or maintained by the University in the conduct of its affairs.
Massey	---
NMIT	All written correspondence, whether paper or electronic, and all spoken transactions, including meetings and telephone calls. Equally, it covers all records of these activities regardless of the media in which they are captured.
Otago	All records owned by the University which fall under the coverage of the Public Records Act (PRA) 2005, regardless of format and media.
UCOL	All records regardless of media, created and received by UCOL in the conduct of its business.
Victoria	All records owned by the University (whether created or received) regardless of format or storage medium, and therefore applies to electronic records.
Waikato	---

Table 16: Particulars of records theme

Seven (n = 7, 70%) of the policy documents mentioned records in one or more capacity. Moreover, there were two main sub-themes present. First, six of the seven documents to mention records in the 'Scope/Application' element (n = 6, 86%) specifically mentioned the ownership of the host organisation. Second, all seven documents to mention records in the 'Scope/Application' element (n = 7, 100%) emphasised that the policy applies to all records regardless of format and media. In the case of the three policies that do not mention the scope of records in this element (Auckland, Massey, Waikato), relatively limited emphasis is

made in their formal definitions for 'Records'. Overall, an emphasis on records is a recognised feature of records management policy scope (Archives New Zealand, 2006, 2014), while the application of the policy to records regardless of form, format, or media is a point made repeatedly Archives New Zealand documentation (2014, 2018c, 2018d).

5.5.3   Theme three: Affiliated organisations

Among the 10 'Scope/Application' elements the theme of affiliated organisations emerged. The particulars of this theme are shown below in Table 17.

TEI	Affiliated organisations theme particulars
Ara	---
Auckland	Staff members of any entities wholly or 50% or more owned by the University.
Canterbury	---
Lincoln	Affiliated organisations, including business enterprises such as subsidiary companies, joint venture companies, partnerships, trusts, research centres and consultants and contractors performing work on behalf of the University.
Massey	All affiliated organisations.
NMIT	Staff of NMIT-owned subsidiary companies, joint venture companies and trusts.
Otago	All staff in controlled entities of the University of Otago, including persons contracted to the University either directly or in partnership with it.
UCOL	All staff of affiliated organisations including its business enterprises.
Victoria	---
Waikato	---

Table 17: Particulars of affiliated organisations theme

Five (n = 5, 50%) of the documents mentioned affiliated organisations, entities, and/or staff. Although it is not a specific requirement of the Archives New Zealand standard(s) for state and integrated schools to address affiliated organisations or controlled entities, it is has long been mandatory for council-controlled organisations to manage their information and records in line with the standard (Archives New Zealand, 2006, 2016b). Accordingly, a direct

address to affiliated organisations or controlled entities, if applicable, is both understandable and appropriate in the case of TEIs.

5.6 Policy element – 'Legal compliance'

Each of the 10 policies contained an element dedicated to 'Legal compliance'. In all cases there was at least one external document listed together with a blurb, varying in length, that typically preceded the list of legislative documents. An overview of these blurbs and the frequency of external documents are shown below in Table 18.

TEI	Commitment to compliance	External documents
Ara	Organisation will comply with information and records management legislation and regulatory requirements.	4
Auckland	Records are to be managed in a manner not inconsistent with the Public Records Act 2005.	1
Canterbury	Organisation is required to manage information within a legislative framework. … In addition, other legislation imposes obligations on the University in terms of managing its information assets and making them available.	9
Lincoln	This policy seeks to ensure compliance with the legislation governing both records management and the information contained within individual records.	11
Massey	Legal compliance.	26
NMIT	NMIT is subject to a number of Acts of Parliament. It requires the creation and maintenance of full and accurate records that support day-to-day functions and business activities of NMIT.	5
Otago	The following legislation (accessible at www.legislation.govt.nz) is relevant to the Records Management Policy and to record keeping activities at the University of Otago.	25
UCOL	UCOL is accountable for the conduct of its business as evidenced in the records of its business activities and transactions. UCOL is subject to both legislative and regulatory requirements.	17
Victoria	The University is required to manage records within a legislative framework.	11
Waikato	This policy takes account of the following legislation.	7

Table 18: Overview of 'Legal compliance' element

Although the details of the blurbs and the breadth of cited documents vary considerably, the consensus among the policies to make a commitment to legal compliance reflects the mandatory status of the PRA 2005 and other relevant legislation or standards (Archives New Zealand, 2018). Moreover, it reinforces the emphasis on legal compliance found in the 'Purpose/Introduction' elements of all ten policies.

5.6.1 Frequency of external legislative documents

There was a total of 103 external legislative documents referenced or discussed in the 'Legal compliance' elements. The frequency and details of these documents are shown below in Table 19.

#	External legislation
10	Public Records Act 2005
9	Official Information Act 1982
8	Privacy Act 1993
7	Education Act 1989
6	Copyright Act 1994; Electronic Transactions Act 2002
5	Tax Administration Act 1994; Finance Reporting Act 1993
4	Health Information Privacy Code
3	Goods and Services Tax Act 1985; Health (Retention of Health Information) Regulations 1996; Companies Act 1993
2	National Library of New Zealand Act 2003; Ombudsmen Act 1975; Public Finance Act 1989; Patents Act 1953; Income Tax Act 1994; Health Act 1956; Employment Relations Act 2000; Designs Act 1953; Contract and Commercial Law Act 2017; Code of Health and Disability Services Consumers' Rights; Evidence Act 2006; General Disposal Authority for District Health Boards
1	Film, Videos and Publications Act 1993; Unsolicited Electronic Messages Act 2007; Trade Marks Act 1953; Trade Marks Act 2002; Health and Safety in Employment Act 1992; Health and Safety at Work Act 2015; Employment Contracts Act 1991; Evidence Act 1908; Evidence Amendment Act 1948; Evidence Amendment Act 1980

Table 19: Frequency of external legislation documents

The PRA appeared in the 'Legal compliance' element of all ten records management policies (n = 10, 100%), which reflects the mandatory status of the legislation with respect to public

sector records management. Similarly, the high rate of incidence of the Official Information

Act 1982 (n = 9, 90%) and the Privacy Act 1993 (n = 8, 80%) reflects the status of these

pieces of legislation with respect to records and information management as well as the

repeated emphasis placed upon them in Archives New Zealand documentation (2006, 2014,

2018c).

5.6.2   Frequency of external standards

There was a total of 13 external standards and related documentation referenced or discussed

in the 'Legal compliance' elements. The frequency and details of these documents are shown

below in Table 20.

#	External standards
10	--
9	--
8	--
7	--
6	--
5	--
4	--
3	Archives New Zealand records management standard (2008)
2	Archives New Zealand records management standard (2016b); Archives New Zealand records management implementation guide (2018c); ISO 15489
1	NZS 8153:2002 Health records; NZS 8165:2005 Rooms/Office-based Surgery and Procedures; General Disposal Authority for New Zealand Universities (DA337); The Digitisation Standard (Archives New Zealand)

Table 20: Frequency of external standards

Five (n = 5, 50%) of the policies included a version of an Archives New Zealand

recordkeeping standard in their 'Legal Compliance' elements. Canterbury, UCOL, and

Victoria listed Archives New Zealand (2008), while Ara and Lincoln listed Archives New

Zealand (2016c). Ara and Lincoln also included Archives New Zealand's implementation

guide (2018c). Among those polices that did not list an Archives New Zealand standard or

other documentation in their 'Legal Compliance' elements, Massey, NMIT, Otago, and Victoria listed an Archives New Zealand's standard elsewhere, while Massey also listed an implementation guide. Waikato alone did not list any standard or other Archives New Zealand documentation.

5.7 Policy element – 'Definitions'

Each of the 10 policies contained an element dedicated to 'Definitions'. The frequency of these definitions, their sources, and how many also appear among Archives New Zealand's key definitions document (2018e) are shown below in Table 21.

TEI	# of definitions	# as Archives New Zealand key definitions	Acknowledged source(s) as stated
Ara	35	16 (46%)	Archives New Zealand, Key definitions 16/F17 (accessed 2 October 2017) https://en.wikipedia.org/wiki/Information_assurance (accessed 29 November 2017)
Auckland	9	3 (33%)	Public Records Act 2005 ISO15489
Canterbury	9	4 (44%)	AS 4390-1996, Part 1, 4.10 Public Records Act 2005 ISO 15-489-1:2001(E) 3.15
Lincoln	11	6 (55%)	Public Records Act 2005 Archives New Zealand's publication the General Disposal Authority for New Zealand Universities
Massey	23	10 (43%)	Public Records Act 2005 AS/NZS ISO 13028:2012 AS/NZS ISO 16175-1:2012 General Disposal Authority for New Zealand Universities
NMIT	19	7 (37%)	Public Records Act 2005 Archives NZ General Disposal Authorities: GDA 6: Common Corporate Services Public Records GDA 7: Facilitative, Transitory and Short-Term Value Records DA424 ITPNZ GDA Disposal Schedule

			ITPNZ GDA Taxonomy v1 - with Classifications
			IT Acceptable Use Policy
Otago	10	4 (40%)	New Zealand Universities General Disposal Authority
UCOL	14	6 (43%)	ISO 15-489-1:2001
			AS 4390:1996
Victoria	15	4 (27%)	---
Waikato	1	1 (100%)	---

Table 21: Overview of 'Definitions' element

In total there were 146 definitions listed in the 'Definitions' element of the 10 policies. The difference between the highest and lowest individual definition lists was considerable, with Ara providing 35 definitions and Waikato only one – a definition of 'Record'.   The acknowledged sources for select definitions vary, with the PRA 2005 (n = 50%, 5) and several retention and disposal authorities being cited most frequently (n = 50%, 5). Of the total definitions, 61 (42%) appear in Archives New Zealand's list of key definitions (2018e) with one TEI (Ara) even listing this document as a source.

5.7.1   Frequency and analysis of notable definitions

The only ubiquitous (n = 10, 100%) definition among the policies was 'Record(s)', which, together with supplementary definition(s) for records ('Public record' [5], 'Vital records' [5], 'Electronic records' [3], 'Administrative records' [2], and various other singly defined types of records [7]) accounted for 22% of the total definitions (32/146). The second highest (n = 8, 80%) discrete definition among the policies was 'Disposal', which together with the definitions for 'General Disposal Authority' (n = 6, 60%) and two others relating to disposal accounted for 11% of the total definitions (16/146). Finally, the definition for 'Records management' occurred in seven (n = 7, 70%) policies, which together with five definitions for the closely related term 'Record keeping' and four further definitions relating to

information management and records management frameworks, also accounted for 11% of the total definitions (16/146).

5.8 Policy element – 'Responsibilities'

Even though only seven policies included a reference to responsibilities in the 'Purpose/Introduction' elements, all 10 policies contained an element that outlined to some extent the responsibilities associated with records management. Document analysis of the 'Responsibilities' elements revealed eight principal themes.
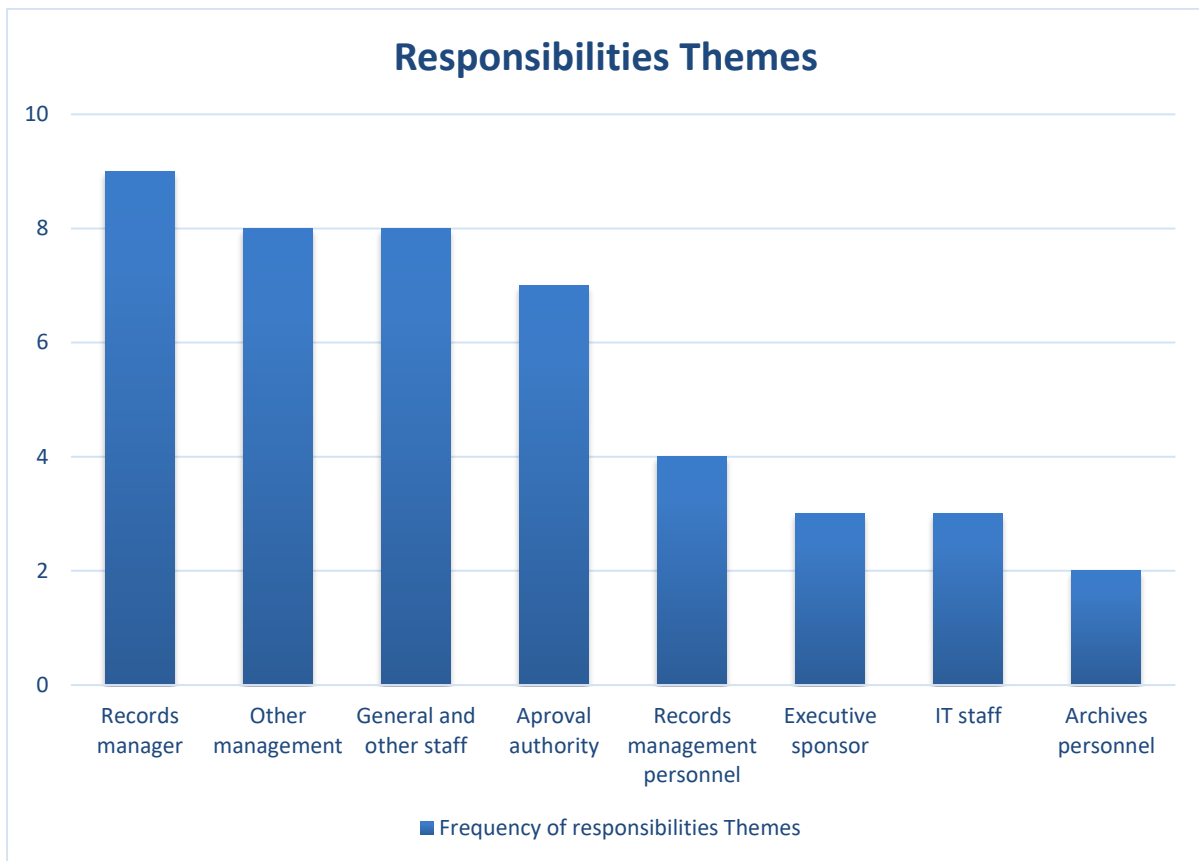
Table 22: 'Responsibilities' element themes

5.8.1 Themes four, six and two: Approval authority, Executive Sponsor and other management

Among the 10 'Responsibilities' elements the themes of approval authority, executive sponsor, and other management emerged. The distribution and details of these themes are shown below in Table 23.

TEI	Approval authority	Executive Sponsor	Other management
Ara	-------------------------------	---------------------------	-----------------------------------
Auckland	Vice-Chancellor	n/a	Line Managers
Canterbury	Vice-Chancellor	n/a	Managers
Lincoln	Vice-Chancellor/ Director, Library, Teaching and Learning (delegated)	Director, Library, Teaching and Learning	-----------------------------------
Massey	Vice-Chancellor	AVC People and Organisational Development	Senior Leadership Team, Heads of Departments (or equivalents) Business Owners, Managers (or equivalents)
NMIT	Chief Executive	Senior manager (non-specific)	NMIT Directors and Institute Leadership Team members
Otago	Vice-Chancellor	n/a	Academic and Service Division Directors, Deans and Departmental Heads
UCOL	Chief Executive Officer	n/a	All UCOL managers and team leaders
Victoria	[Vice-Chancellor]	n/a	Responsible Managers
Waikato	[Deputy Vice-Chancellor Academic]	n/a	Deans, Directors and equivalent Line managers

Table 23: Distribution and details of approval authority, Executive Sponsor, and other management themes

Each policy, with the exception of Ara, Victoria, and Waikato designated an approval authority in the 'Responsibilities' element (n = 7, 70%). For Ara this theme would most likely have been covered in CPP114a, while for Victoria and Waikato the designation of an approval authority appeared elsewhere in the document, albeit without the same degree of emphasis or detail. The designation of an approval authority is in line with Archives New

Zealand documentation which, although not prescriptive, recommends that the chief executive or administrative head be included at the forefront of staff responsibilities (2006, 2008). In terms of the Executive Sponsor, among those four policies approved or reviewed post-2016 when Archives New Zealand's most recent standard (2016c) made compulsory the appointment of this position to oversee information and records management, three designated the position (Lincoln, Massey, NMIT) while the fourth, Ara, would presumably have done so in CPP114a.

5.8.2 Themes three, four and eight: Records manager, records management and archives personnel

Among the 10 'Responsibilities' elements the themes of records manager, records management, and archives personnel emerged. The distribution and details of these themes are shown below in Table 24.

TEI	Records manager	Records management personnel	Archives personnel
Ara	------------------------	---	----------------------
Auckland	Records Management Programme Manager	Records co-ordinators for each Faculty, Large Scale Research Institute, or Service Division	----------------------
Canterbury	Information and Records Manager	---	----------------------
Lincoln	Records and Research Data Analyst (delegated)	Records Management Steering Group	----------------------
Massey	Director, Information and Records Management	Information and Records Management (IRM) Team Information Champions	University Archives team
NMIT	NMIT Records Manager	---	----------------------
Otago	Head of Corporate Records Services	Records officers for each Faculty, Department, School, Centre or Service Division	----------------------
UCOL	Corporate Systems	---	----------------------
Victoria	Manager Record Services	---	----------------------

Waikato	University Librarian	---------------------------------------	Director of Facilities Management

Table 24: Distribution and details of records manager, records management and archives personnel themes

Each policy, with the exception of Ara, designated the position of records manager in the 'Responsibilities' element (n = 9, 90%). For Ara this theme would most likely have been covered in CPP114a. In addition, four of the policies (n = 4, 40%) outlined the responsibilities of further records management personnel, while two also included dedicated archives personnel (n = 2, 20%). Access to and the designation of qualified records management staff is a mandatory requirement of Archives New Zealand standards (2014, 2016b).

5.8.3 Themes three and seven: General/other and IT staff

Among the 10 'Responsibilities' elements the themes of general/other and IT staff emerged. The distribution and details of these themes are shown below in Table 25.

TEI	General	/	Other	IT staff
Ara	----------	/	------------------------------------	------------------------------------
Auckland	----------	/	------------------------------------	------------------------------------
Canterbury	All staff	/	Contractors Consultants	Information and Technology Services Staff
Lincoln	All staff	/	------------------------------------	------------------------------------
Massey	All staff	/	Volunteers Independent Contractors	Information Technology System (ITS)
NMIT	All staff	/	------------------------------------	------------------------------------
Otago	All staff	/	------------------------------------	Information Technology (IT/ICT) staff
UCOL	All staff	/	Contractors	------------------------------------
Victoria	All staff	/	Contractors Volunteers	------------------------------------
Waikato	----------	/	Independent contractors (job managers)	------------------------------------

Table 25: General/other and IT staff themes

Seven of the policies (n = 7, 70%) emphasised and outlined the responsibilities of all staff in the 'Responsibilities' element. Of those polices that did not, Auckland and Waikato, although mentioning the compliance requirements for all staff elsewhere, elected to adopt a top-down approach for responsibilities in this element, while Ara would most likely have covered this theme in CPP114a. In addition, five policies (n = 5, 50%) emphasised and outlined the responsibilities of other staff, including contractors and volunteers. The allocation and clarification of recordkeeping requirements for all organisational staff and for those volunteering on behalf of or contracted to the organisation is a firm requirement of Archives New Zealand documentation (2008, 2014, 2016b, 2016c). Finally, three policies (n = 3, 30%) outlined the responsibilities for IT staff. The specific inclusion of responsibilities for this group, although not mandated, perhaps represents the increasing importance of ICT with respect to records management and reflects Archives New Zealand's recommendation to align and integrate the organisation's records management policy with policies for ICT (2014, 2018d).

5.9   Policy element – 'Principles' and 'Policy'

Four TEIs outlined records management (or recordkeeping) principles in a dedicated section (Ara, UCOL, Waikato, and NMIT, n = 4, 40%), while eight included similar statements or content in the 'Policy' sections proper (Auckland, Canterbury, Massey, Lincoln, NMIT, Otago, UCOL, Victoria, n = 8, 80%).

In the cases of Massey and Lincoln, although their policy purpose(s) stated that the document would outline the principles, the word principle(s) was not used outside of the purpose in Lincoln's policy, while Massey's listed the principles in the 'Policy' element proper. Likewise, Otago outlined a set of principles, not for records management in general, but for each Faculty, Department, School, Centre or Service Division to apply to recordkeeping.

Finally, NMIT and UCOL's policies possessed a 'Policy' as well as a 'Principles' element. In both instances there was a degree of overlap between the content of the elements, particularly in the case of UCOL.

Accordingly, initial document and content analysis of these elements combined the four 'Principle' and eight 'Policy' elements. This initial analysis revealed and subsequently coded 23 primary and recurrent themes. Once the occurrence and distribution of these themes were recorded, the coding of the themes was extended to the policies as a whole. In this way, not only was the coding of the 23 themes able to reveal the nature and priorities of the 'Principle' and the 'Policy' elements, but also to trace the resonance and consequence of these themes in a more wholistic manner throughout the entire document.

The frequency and distribution of the coded 'Principles' and 'Policy' themes within the elements proper are represented, in Table 26 below, by the figures in the first line of each row, while the frequency and distribution of the same themes throughout the entire document, including the initial total from the elements, are expressed in parentheses.

'Principles' and 'Policy' Themes	Ara	Auckland	Canterbury	Lincoln	Massey	NMIT	Otago	UCOL	Victoria	Waikato	TEI total #
1. Access and accessibility of records	3	2	6	3	5	3	6	5	5	7	45
	(7)	(2)	(14)	(7)	(14)	(10)	(11)	(7)	(6)	(9)	(87)
2. Retention and disposal of records	4	2	8	3	2	1	5	2	3	2	32
	(21)	(5)	(26)	(13)	(28)	(14)	(15)	(8)	(7)	(4)	(141)
3. Recordkeeping systems	2	0	1	3	6	1	2	3	1	1	20
	(4)	(3)	(4)	(3)	(14)	(14)	(8)	(8)	(3)	(3)	(64)
4. Ownership of records	0	1	3	0	2	1	0	2	0	2	11
	(0)	(1)	(3)	(1)	(3)	(2)	(1)	(2)	(1)	(2)	(16)

'Principles' and 'Policy' Themes	Ara	Auckland	Canterbury	Lincoln	Massey	NMIT	Otago	UCOL	Victoria	Waikato	TEI total #
5. High value/ vital/permanent value records	1 (2)	1 (1)	2 (4)	0 (6)	1 (5)	1 (4)	1 (2)	1 (3)	1 (3)	1 (2)	10 (32)
6. Archives/archived records	1 (3)	0 (0)	1 (6)	0 (1)	0 (9)	0 (3)	2 (2)	0 (2)	0 (2)	2 (7)	6 (35)
7. Appropriate physical storage and preservation	5 (9)	2 (2)	0 (1)	3 (3)	0 (1)	3 (6)	2 (2)	1 (1)	0 (1)	1 (2)	17 (28)
8. Personal storage/devices	0 (0)	0 (0)	1 (1)	0 (0)	1 (2)	1 (1)	0 (0)	1 (1)	0 (0)	0 (0)	4 (5)
9. Legal compliance/ business requirements	5 (15)	1 (10)	1 (12)	6 (12)	4 (11)	1 (6)	1 (9)	2 (11)	1 (3)	2 (5)	24 (94)
10. Values-based model	2 (2)	0 (0)	1 (1)	0 (0)	1 (1)	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)	4 (4)
11. Full and accurate records/adequate for purpose	1 (3)	1 (2)	1 (4)	2 (4)	1 (3)	4 (6)	2 (4)	3 (6)	1 (3)	1 (1)	17 (36)
12. One-time creation and re-use	0 (0)	0 (0)	0 (0)	1 (1)	2 (2)	0 (0)	0 (0)	1 (1)	0 (0)	0 (0)	4 (4)
13. Commitment to training/support/ implementation	0 (2)	2 (4)	0 (4)	0 (3)	2 (10)	0 (3)	2 (4)	0 (3)	1 (3)	0 (2)	7 (38)
14. Records as assets	2 (6)	0 (0)	1 (1)	0 (0)	3 (5)	0 (0)	0 (0)	1 (1)	0 (0)	0 (0)	7 (13)
15. Metadata/ taxonomy	0 (2)	1 (1)	1 (2)	0 (0)	2 (6)	2 (4)	0 (0)	0 (0)	1 (3)	0 (0)	7 (18)
16. Authenticity/ integrity/reliability	1 (2)	1 (1)	1 (2)	1 (1)	1 (1)	1 (2)	1 (1)	2 (2)	3 (3)	1 (1)	13 (16)
17. Migration strategy/usability for life cycle	0 (0)	0 (0)	2 (2)	0 (0)	1 (1)	1 (1)	1 (1)	3 (3)	1 (1)	0 (0)	9 (9)
18. Business activities/ transactions/functions	1 (8)	1 (5)	3 (9)	2 (7)	2 (5)	2 (10)	1 (3)	2 (9)	3 (4)	1 (1)	18 (61)
19. Affiliated entities/contractors/ volunteers	0 (2)	0 (1)	0 (4)	0 (3)	1 (7)	1 (4)	1 (2)	1 (4)	3 (5)	2 (2)	9 (34)
20. Risk management	2	0	1	0	0	0	0	0	0	0	3

'Principles' and 'Policy' Themes	Ara	Auckland	Canterbury	Lincoln	Massey	NMIT	Otago	UCOL	Victoria	Waikato	TEI total #
	(4)	(0)	(1)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(5)
21. Good/best (business) practice	2	0	2	1	0	0	2	1	0	0	8
	(3)	(1)	(3)	(2)	(1)	(1)	(0)	(1)	(0)	(0)	(12)
22. Evidence/external audits	3	0	1	3	0	2	0	1	2	0	12
	(3)	(1)	(1)	(4)	(0)	(2)	(0)	(1)	(3)	(0)	(15)
23. Personal information/storage devices	0	0	0	0	1	0	0	1	0	0	2
	(0)	(0)	(1)	(0)	(2)	(1)	(0)	(2)	(0)	(0)	(6)
Total(s)	35	15	37	28	38	25	29	33	26	23	289
	(98)	(28)	(106)	(71)	(131)	(94)	(65)	(76)	(51)	(41)	(773)

Table 26: Frequency and distribution of 'Principles' and 'Policy' elements coded themes

The coding of the 23 themes in the 'Principles' and 'Policy' elements yielded 289 discrete occurrences, a figure which increased to 773 when the coding was expanded to the entire policy. This represented an overall percentage increase of 167%. The TEI with the largest increase after the expanded coding was NMIT (276%), while Waikato had the lowest (78%). In terms of individual policies and the distribution of the coded themes throughout, the TEIs ranked as follows:

1. Canterbury: 96% (n = 22/23)

2. Massey: 91% (n = 21/23)

3. UCOL: 87% (n = 20/23)

4. NMIT: 83% (n = 19/23)

5. Ara: 78% (n = 18/23)

6. (equal) Lincoln: 70% (n = 16/23)

6. (equal)Victoria: 70% (n = 16/23)

8. Auckland: 65% (n = 15/23)

9. Otago: 61% (n = 14/23)

10. Waikato: 57% (n = 13/23)

These rankings, although not prescriptive, will be used in Section 7 to help determine the overall rank of each TEI with respect to their policy hubs and records management policies.

5.9.1 Top 10 'Principles' and 'Policy' themes

The expansion of 'Principles' and 'Policy' themes also generated, useful for the purpose of comparison and analysis, two sets of rankings. The top 10 themes before and after coding the entire document are shown below in Table 27.

Rank	Themes in 'Policy' and 'Principles'	#	Themes in entire policy document	#	Trend
1	Access and accessibility of records	(45)	Retention and disposal of records	(141)	↑ 1
2	Retention and disposal of records	(32)	Legal compliance/business requirements	(94)	↑ 1
3	Legal compliance/business requirements	(24)	Access and accessibility of records	(87)	↓ 2
4	Recordkeeping systems	(20)	Recordkeeping systems	(64)	=
5	Business activities/ transactions/functions	(18)	Business activities/ transactions/functions	(61)	=
=6	Appropriate physical storage and preservation	(17)	Commitment to training/support/implementation	(38)	new
=6	Full and accurate records/adequate for purpose	(17)	Full and accurate records/adequate for purpose	(36)	↓ 1
8	Authenticity/integrity/reliability	(13)	Archives/archived records	(35)	new
9	Evidence/external audits	(12)	Affiliated entities/ contractors/volunteers	(34)	new
10	Ownership of records	(11)	High value/vital/permanent value records	(32)	new

Table 27: Top 10 'Principles' and 'Policy' elements coded themes

Before and after the expansion of coding throughout the document, the top five remained the same, albeit with a slight shuffling of the order. It is worth noting, however, that the gap between the top five themes and those immediately below widens considerably when the entire document is considered.

In the bottom half of the top 10, when the entire document is taken into consideration the coded themes of appropriate physical storage and preservation of records (Theme 7), the authenticity, integrity, and reliability of records (Theme 16), records used as evidence and external audits (Theme 22), and ownership of records are essentially replaced by the commitment to records management training, support, and implementation (Theme 13), archives and archived records (Theme 6), affiliated entities including contractors and volunteers (Theme 19), and records of high, permanent, and vital value (Theme 5).

5.10 Discussion

This content analysis encompassed 10 TEI records and information management policies: seven from universities, three from polytechnics. The analysis first identified eight primary and recurrent policy document elements: Purpose/Introduction, Scope/Application, Definitions, Legal Compliance, Responsibilities, Policy, and Principles. For each of these elements, themes and sub-themes were identified and analysed across the TEI data population as a whole and individually. There was found to exist a reasonable degree of uniformity across the sector with respect to the content of the elements and, for the most part, the material accorded with a variety of Archives New Zealand documentation (2006, 2014, 2016, 2018c, 2018d).

Several notable themes emerged from the content analysis. First, there was a clear commitment from all 10 policies to legislative compliance. This commitment occurred both in the 'Purpose/Introduction' elements and in separate elements dedicated to 'Legal compliance'. This legal emphasis accords well with the mandatory status of the PRA and associated legislation (Archives New Zealand 2008, 2014, 2016c). Second, there was a strong emphasis on the organisation's records management personnel. All policies, with the exception of Ara, not only designated an individual in charge of records management, but

four included or designated records management teams, champions, or officers. Having access to or possession of skilled records management staff is not only crucial with respect to establishing a successful records management framework, it is a firm and mandatory requirement of Archives New Zealand's standards (2014, 2016b). Finally, document-wide coding revealed a constant group of five top ranked themes among the 10 TEI records management policies: retention and disposal of records, legal compliance/business requirements, access and accessibility of records, recordkeeping systems, and business activities/transactions/functions. Further research is needed to determine and articulate the precise import of these top ranked themes, both intratextually and as they relate to additional organisational and Archives New Zealand documentation. Moreover, there is the potential to analyse these policy themes in light of any detectable preference for procedural or theoretical approaches to content.

6 Compliance and comprehensiveness of records and information management policies

As we have seen (2.3.2), Archives New Zealand's most recent standard (2016b) is based around three principles:

- Principle 1: Organisations are responsible for managing information and records

- Principle 2: Information and records management supports business

- Principle 3: Information and records are well managed

In turn, there are 21 minimum compliance requirements (MCRs) attached to these principles:

Principle 1	Principle 2	Principle 3
1.1 Regularly reviewed strategy and policy needed.	2.1 Information and records required for business needs must be identified.	3.1 Information and records must be routinely created and managed as part of normal business practice.

1.2 Senior management input and direction needed.	2.2 High risk/high value areas of business and its information must be identified and reviewed.	3.2 Information and records must be reliable and trustworthy.
1.3 Executive Sponsor role compulsory.	2.3 High risk/high value business must incorporate information and records management.	3.3 Information and records must be identifiable, retrievable, accessible and usable for as long as they are required.
1.4 Organisation must have information and records management staff or access to such skills.	2.4 All operating environments require information and records management	3.4 Information and records must be protected from unauthorised or unlawful access, alteration, loss, deletion and/or destruction.
1.5 Integration with business processes, systems and services.	2.5 Information and records management must be designed to safeguard information and records with long-term value.	3.5 Access to, use of and sharing of information and records must be managed appropriately in line with legal and business requirements.
1.6 Staff must understand responsibilities and relevant policies and procedures.	2.6 Information and records must be maintained through systems and service transitions by strategies and processes specifically designed to support business continuity and accountability.	3.6 Information and records must be kept for as long as needed for business, legal and accountability requirements.
1.7 Information and records management responsibilities apply to outsourced and service contracts.	---------------------------------	3.7 Information and records must be systematically disposed of when authorised and legally appropriate to do so.
1.8 Information and records management must be monitored and reviewed.	---------------------------------	---------------------------------

Table 28: Archives New Zealand standard minimum compliance requirements (2016b)

Minimum compliance requirements 1.1-1.7 are directly linked to an information and records management policy, 2.1, 3.1 and 3.5-3.7 are linked to policies in general, while the remainder constitute records management best practice.

In order to gauge the degree to which the TEI records management policies could be said to follow or comply with Archives New Zealand's mandatory standard (2016b), a customised coding checklist was created by substantiating and corroborating the MCRs via several other Archives New Zealand documents, including:

- Archives New Zealand's *Create and maintain: A guide to developing a recordkeeping policy* (2006)

- Archives New Zealand's *Create and maintain recordkeeping standard* (2008)

- Archives New Zealand's *Records management standard for the New Zealand public sector* (2014)

- Archives New Zealand's *Implementation guide – Information and records management standard* (2018c)

- Archives New Zealand's *Information and records management policy development* (2018d)

It was necessary (and, indeed, desirable) to include the earlier Archives New Zealand documents (2006, 2008, 2014) as six of the policies were authorised or revised before the publication of the most recent Archives New Zealand standard in 2016. In terms of the more recent documents, Archives New Zealand's *Implementation guide – Information and records management standard* (2018c) expands upon the 21 MCRs and provides key guidance for implementing each requirement, while Archives New Zealand's *Information and records management policy development* (2018d), is a factsheet designed to provide policy advice and outline the main components of an information and records management policy.

6.1 Coding checklist for TEI policy compliance and comprehensiveness

	Coded theme	Code source(s)	Code category
1	Demonstrates to employees and stakeholders the value of	Archives New Zealand 2014, 2016b, 2016c, 2018d.	Comprehensiveness

	business information to the organisation and its goals.		
2	Acknowledges information and records are key strategic assets.	Archives New Zealand 2014, 2016b, 2016c, 2018d.	Comprehensiveness
3	Makes clear corporate ownership of information and records.	Archives New Zealand 2006, 2018d.	Comprehensiveness
4	Acknowledges information and records management is a fundamental corporate function that supports business activity.	Archives New Zealand 2006, 2014, 2016b, 2018d.	Comprehensiveness
5	Outlines the core principles for effectively managing the organisation's business information and records.	Archives New Zealand 2006, 2018d.	Comprehensiveness
6	Acknowledges information and records management is the responsibility of senior management.	Archives New Zealand 2006, 2008, 2014, 2016b, 2018d.	Compliance
7	Indicates compliance with information and records management policy applies to all staff.	Archives New Zealand 2006, 2014, 2016b, 2018d.	Compliance
8	Assigns roles and responsibilities at all levels of the organisation.	Archives New Zealand 2006, 2008, 2014, 2016b, 2018d.	Compliance
9	States information and records management responsibilities of all outsourced and service contracts, instruments and arrangements.	Archives New Zealand 2006, 2014, 2016b.	Compliance
10	Clearly links related organisational policies, procedures, processes, guidelines, and other documents.	Archives New Zealand 2006, 2014, 2016b, 2018d.	Compliance
11	Includes a general commitment by the organisation to adhere to any relevant legislation and standards.	Archives New Zealand 2006, 2008, 2018d.	Compliance
12	Specifies legislation relevant to organisation/policy, including PRA 2005.	Archives New Zealand 2006, 2014, 2018d.	Compliance
13	Ensures access to, use and sharing of information and records are in line with legal requirements.	Archives New Zealand 2014, 2016b.	Compliance
14	Identifies recordkeeping standards to be used by the organisation, including	Archives New Zealand 2006, 2014, 2018d.	Compliance

	Archives New Zealand's Information and records management standard.		
15	Covers all systems across all operating environments that contain or manage information and records.	Archives New Zealand 2006, 2008, 2016b, 2018d.	Compliance
16	Outlines briefly how information and records should be made and kept.	Archives New Zealand 2006, 2008, 2014, 2016b, 2018d.	Compliance
17	Includes requirements for authorised disposal or intentions to seek authorisation.	Archives New Zealand 2006, 2008, 2014, 2016b, 2018d.	Compliance
18	States how the organisation will meet the requirement to create full and accurate information and records.	Archives New Zealand 2006, 2008, 2014, 2016b, 2018d.	Compliance
19	Outlines commitment by senior management to support the policy and to resource and monitor appropriately its implementation.	Archives New Zealand 2006, 2008, 2014, 2016b, 2018d.	Compliance
20	Acknowledges and designates the position of Executive Sponsor (or equivalent for policies pre-2016, e.g. Chief Executive).	Archives New Zealand 2006, 2008, 2016b, 2018d.	Compliance
21	States role and responsibilities of Executive Sponsor (or equivalent for policies pre-2016, e.g. Chief Executive).	Archives New Zealand 2006, 2008, 2016b, 2018d.	Compliance
22	Indicates that information and records management will be monitored and reviewed.	Archives New Zealand 2006, 2008, 2014, 2016b, 2018d.	Compliance
23	Mandates an appropriate person or role in charge of monitoring and preparing reports.	16/F10 v1.1, Main components; G6 passim	Comprehensiveness
24	Includes a publication date and a review cycle to ensure the continued relevancy of the policy. Check and revise? Is 2.0	Archives New Zealand 2006, 2008, 2014, 2016b, 2018d.	Compliance
25	Indicates organisation has information and records management staff, or access to appropriate skills.	Archives New Zealand 2008, 2014, 2016b.	Compliance
26	Identifies high risk/high value areas of business, and the information and records needed to support them.	Archives New Zealand 2008, 2014, 2016b.	Compliance

27	Indicates implementation or awareness of a migration strategy to maintain the accessibility and usability of digital information and records.	Archives New Zealand 2006, 2008, 2014, 2016b.	Compliance
28	Information and records must be reliable and trustworthy.	Archives New Zealand 2008, 2014, 2016b.	Compliance
29	Indicates physical information and records stored in appropriate storage areas and conditions to maintain accessibility and usability.	Archives New Zealand 2006, 2008, 2014, 2016b.	Compliance
30	Acknowledges need/measures to protect information and records from unauthorised or unlawful access, alteration, loss, deletion and/or destruction.	Archives New Zealand 2006, 2008, 2014, 2016b.	Compliance

Table 29: Coding checklist for TEI policy compliance and comprehensiveness

During the construction of this checklist it was decided that six of the questions (1-5, and 23) better represented a condition of comprehensiveness than compliance. In other words, while the content of the questions receives a strong point of emphasis in Archives New Zealand documentation, it is not explicitly mandated. For instance, in the cases of Questions 2, 3, 4 it is Archives New Zealand's policy development document that states these areas must be present in a records management policy (2018d) not the standard (2016b).

In terms of the scoring for the checklist, as with the policy hubs it was determined, following the collection (and coding) of data and a series of test runs, that a more nuanced approach than a simple binary scale better represented the states of compliance and comprehensiveness of the TEI records management policies (Liang, 2007). Accordingly, this checklist employed a three-point scale throughout (2, 1, 0) with the distribution set at 'Fully = 2', 'Partial = 1' and 'No = 0'. Accordingly, the aggregate scores were out of a total of 60.

6.2 Aggregate TEI policy checklist scores

The overall totals for the compliance and comprehensiveness of each TEI records
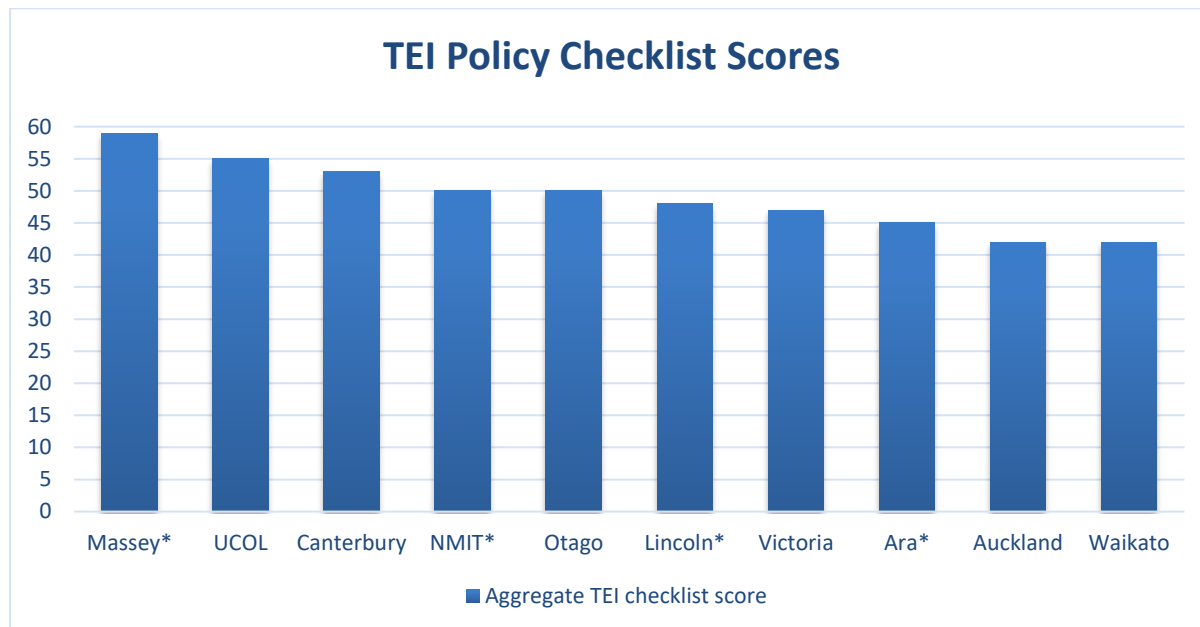
management policy are shown below in Table 30.

Table 30: Total TEI policy scores for compliance and comprehensiveness

Massey scored the highest with 59, while Waikato the lowest with 42. The mean average

checklist score for the TEI policies was 49.1. The average for the seven universities was

48.8, while for the three polytechnics it was 50. The average for the six policies (Auckland,

Canterbury, Otago, UCOL, Victoria, and Waikato) approved or revised prior to 2016 was

48.2, while the average for the four policies (Ara, Lincoln, Massey, and NMIT) approved or

revised post 2016 was 50.5. Essentially, there was minimal difference between the

compliance and comprehensiveness of the TEI policies when analysed according to type of

institution or date of policy publication/revision.

6.3 Analyses of individual coding results

The following three tables (31-33) demonstrate and facilitate the analysis of the individual

compliance and comprehensiveness coding results of the TEI records management policies.

6.3.1 Code scores 2.0-1.9

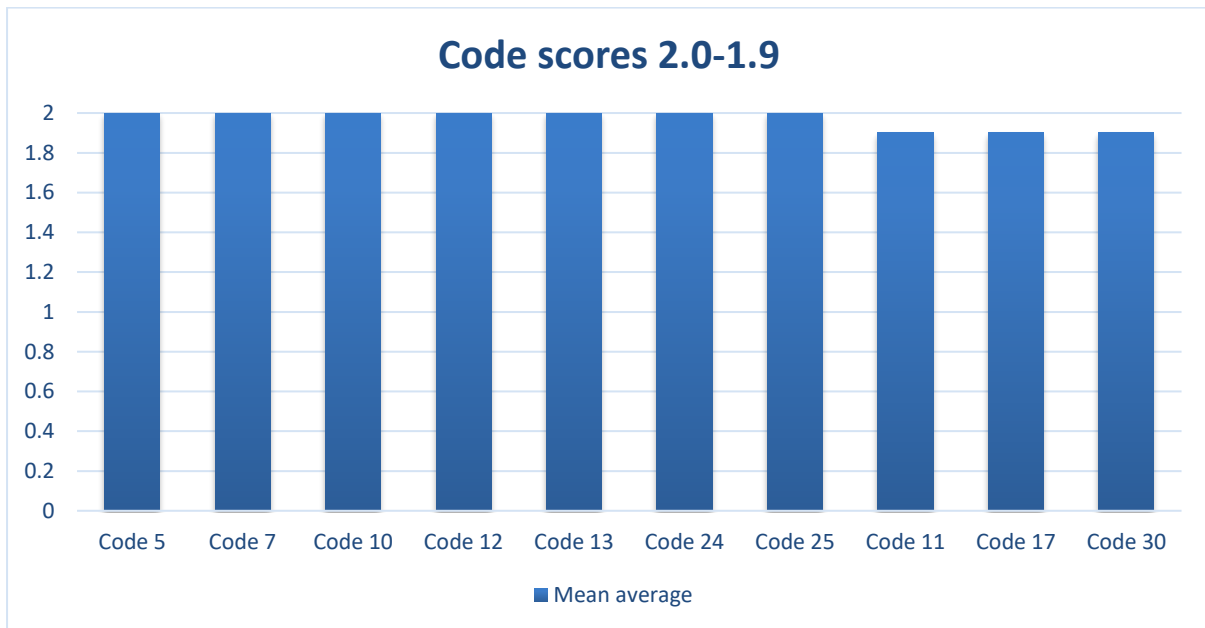Ten individual codes (n = 10, 33%) fell within the mean average range of 2.0-1.9.

Table 31: Code scores 2.0-1.9

2.0

Code 5 – outline of core principles for effective management of organisation's business information and records.

All policies complied fully.

Code 7 – indication that compliance with information and records management policy applies to all staff.

All policies complied fully.

Code 10 – clear links to related organisational policies, procedures, processes, guidelines, and other documents.

All policies complied fully.

Code 12 – specification of legislation relevant to organisation/policy, including PRA 2005.

All policies complied fully.

Code 13 – assurance that access to, use and sharing of information and records are in line with legal requirements.

All policies complied fully.

Code 24 – inclusion of a publication date and a review cycle to ensure the continued relevancy of the policy.

All policies complied fully.

Code 25 – indication that organisation has information and records management staff, or access to appropriate skills.

All policies complied fully.

1.9

Code 11 – general commitment by the organisation to adhere to any relevant legislation and standards.

All policies complied fully with the exception of NMIT which partially complied since the policy only listed Archives New Zealand standards in external references at the end of the policy without explicit mention of adherence.

Code 17 – requirement for authorised disposal or intentions to seek authorisation.

All policies complied fully with the exception of Ara which partially complied since the policy only covered authorised disposal with reference to the Manager, Information and Records, although it is likely that the theme of disposal would have been covered in more detail in CPP114a.

Code 30 – acknowledgment of need to protect information and records from unauthorised or unlawful access, alteration, loss, deletion and/or destruction.

All policies complied fully with the exception of Auckland since the policy limited treatment of this theme to confidential records only.

6.3.2   Code scores 1.8-1.7

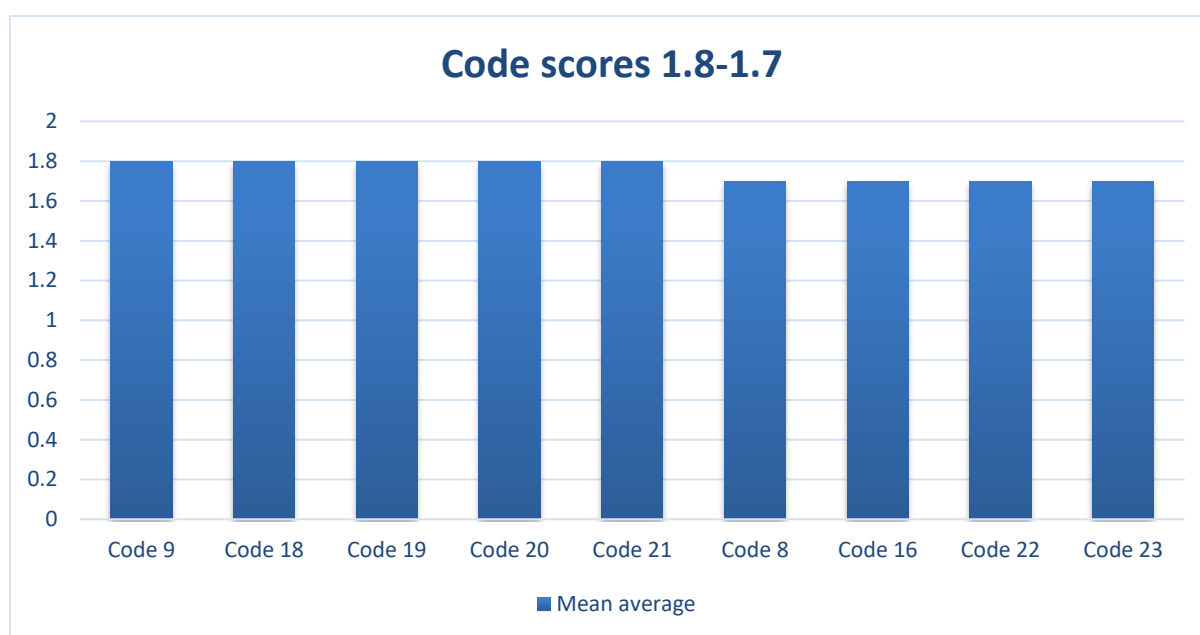Nine individual codes (n = 9, 30%) fell within the mean average range of 1.8-1.7.

Table 32: Code scores 1.8-1.7

1.8

Code 9 – statement of information and records management responsibilities of all outsourced and service contracts, instruments and arrangements.

All policies complied fully with the exception of Ara and Auckland both of which partially complied. Auckland since the policy limited treatment of this theme to the definition of controlled entities only, Ara since the policy did not address these responsibilities in any detail, although it is likely that this theme would have been covered in CPP114a.

Code 18 – statement of how the organisation will meet the requirement to create full and accurate information and records.

All policies complied fully with the exception of Ara and Waikato both of which partially complied. Ara since the policy only mentioned the creation of full and accurate information and records with respect to CPP114a, Waikato since the policy briefly addressed full records but did not mention or expound upon accurate records.

Code 19 – commitment by senior management to support the policy and to resource and monitor appropriately its implementation.

All policies complied fully with the exception of Ara and Waikato both of which partially complied. Ara since the policy only alluded to this theme with respect to CPP114a, Waikato since the policy did not expound upon the involvement of senior management with respect to support.

Code 20 – acknowledgement and designation of the position of Executive Sponsor (or equivalent for policies pre-2016).

All policies complied fully with the exception of NMIT and Waikato both of which partially complied. NMIT since the policy acknowledged but did not designate the role, Waikato since it did not make explicit the organisational relationship between the University Librarian and the Deputy Vice-Chancellor with respect to records management.

Code 21 – statement of the role and responsibilities of Executive Sponsor (or equivalent for policies pre-2016).

All policies complied fully with the exception of Ara and Waikato both of which partially complied. Ara since the policy treated this theme only tangentially, although it is likely that this theme would have been covered in CPP114a, Waikato since the policy did not make

explicit the role (and responsibilities) of University Librarian especially in terms of its relationship to the Deputy Vice-Chancellor.

1.7

Code 8 – assignment of roles and responsibilities at all levels of the organisation.

All policies complied fully with the exception of Auckland, which partially complied, and Ara which did not comply. Auckland since the policy did not make explicit the responsibilities of the 'all (or general) staff' group, Ara since the policy did not adequately address roles and responsibilities, although it is likely that this theme would have been covered in CPP114a.

Code 16 – a brief outline of how information and records should be made and kept.

All policies complied fully with the exception of Otago, which partially complied, and Ara which did not comply. Otago since the policy's treatment of this theme was insubstantial, Ara since the policy did not treat this theme, although it was most likely to have been covered in CPP114a.

Code 22 – indication that information and records management will be monitored and reviewed.

All policies complied fully with the exception of Canterbury, which partially complied, and Lincoln which did not comply. Canterbury since the policy made no mention of a review process only monitoring, Lincoln since the policy made no mention of either a review or monitoring process.

Code 23 – designation of an appropriate person or role in charge of monitoring and preparing reports.

All policies complied fully with the exception of Canterbury, which partially complied, and Lincoln which did not comply. Canterbury since the policy designated the Information and Records Manager for monitoring compliance only, Lincoln since the policy made no mention of either a review or monitoring process.

6.3.3   Code scores 1.5-0.73

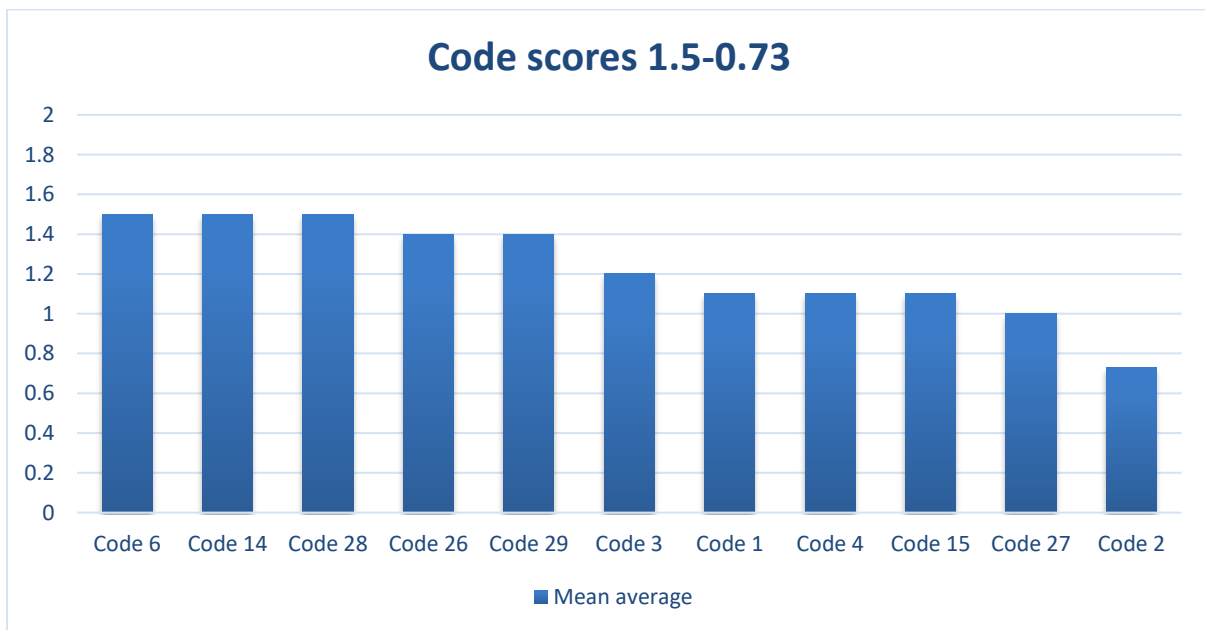Eleven individual codes (n = 11, 37%) fell within the mean averaged range of 1.5-0.73.

Table 33: Code scores 1.5-0.73

1.5

Code 6 – acknowledgement that information and records management is the responsibility of senior management.

All policies complied fully with the exception of Auckland, Victoria, Waikato, which partially complied, and Ara which did not comply. Auckland and Victoria since the policies mentioned the responsibility of the Vice-Chancellor only, Waikato since the policy omitted the upper tier of senior management, and Ara since this theme was not treated and would most likely have been covered in CPP114a.

Code 14 – identification of recordkeeping standards to be used by the organisation, including Archives New Zealand's Information and records management standard.

All policies complied fully with the exception of Auckland, NMIT, and UCOL, which partially complied, and Waikato which did not comply. Auckland since the policy only mentioned associated mandatory standards issued under PRA without specification, NMIT since the policy only listed an Archives New Zealand recordkeeping standard in references, UCOL since the policy only mentioned Archives New Zealand mandatory standards without specification, and Waikato since the policy did not identify any recordkeeping standards.

Code 28 – acknowledgment that information and records must be reliable and trustworthy.

All policies complied fully with the exception of Canterbury, which partially complied, and Auckland and Otago, which did not comply. Canterbury since the policy treated reliability and trustworthiness obliquely, Auckland and Otago since the policies did not address the reliability and trustworthiness of records.

1.4

Code 26 – identification of high risk/high value areas of business, and the information and records needed to support them.

All policies complied fully with the exception of Lincoln, Otago, UCOL, and Waikato, which partially complied, and Auckland, which did not comply. Lincoln since the policy only identified the potential for vital records, Otago since the policy only identified the potential for records of permanent value, UCOL since the policy only identified the potential for records of permanent or on-going value, and Waikato since the policy only identified the potential for records of long-term value, Auckland since the policy did not identify high risk/high value areas of business or the information and records needed to support them.

Code 29 – indication that physical information and records are stored in appropriate storage areas and conditions to maintain accessibility and usability.

All complied fully with the exception of Victoria and Waikato, which partially complied, and Auckland and Canterbury, which did not comply. Victoria and Waikato since the policies did not explicitly include physical records with respect to storage, Auckland and Canterbury since the policies did not address storage or physical records.

1.2

Code 3 – the acknowledgement of corporate ownership of information and records.

All complied fully with the exception of NMIT and Otago, which partially complied, and Ara, Lincoln, and Victoria, which did not comply. NMIT since the policy emphasised records only as intellectual property of the institution, Otago since the policy adopted an a priori stance towards ownership of (owned) records, and Ara, Lincoln, and Victoria, since the policies did not establish or emphasise corporate ownership of records.

1.1

Code 1 – demonstration to employees and stakeholders of the value of business information.

All complied fully with the exception of UCOL, which partially complied, and NMIT, Otago, Victoria, and Waikato, which did not comply. UCOL since the policy did not place full emphasis on the intrinsic value of business information, NMIT, Otago, Victoria, and Waikato since the policies did not treat this theme.

Code 4 – acknowledgement that information and records management is a fundamental corporate function that supports business activity.

All complied fully with the exception of Auckland, Canterbury, and UCOL, which partially complied, and NMIT, Victoria, and Waikato, which did not comply. Auckland, Canterbury,

and UCOL, since the policies only recognised the benefits of records management rather than acknowledged its fundamental nature or function, NMIT, Victoria, and Waikato since the policies did not treat this theme.

Code 15 – recognition of all systems across all operating environments that contain or manage information and records.

All complied fully with the exception of Ara, UCOL, Victoria, which partially complied, and Auckland, Lincoln, Waikato, which did not comply. Ara since the policy only identified select systems in passing, UCOL and Victoria since the policies only identified and defined (recordkeeping) systems in general, Auckland, Lincoln, and Waikato since the policies did not define or identify systems in any detail.

1.0

Code 27 – indication of a migration strategy to maintain the accessibility and usability of digital information and records.

All complied fully with the exception of Ara, Canterbury, Lincoln, Massey, Otago, Waikato, which partially complied, and Auckland and Victoria, which did not comply. Ara, Canterbury, Lincoln, and Massey since the policies acknowledged the importance of accessibility over time but did not make an explicit migration plan or statement, and Otago and Waikato since the policies outlined appropriate long-term management of cultural or high value records without a clear migration plan or statement, Auckland and Victoria since the policies did not address this theme.

0.73

Code 2 – acknowledgement that information and records are key strategic assets.

All complied fully with the exception of Auckland, Lincoln, NMIT, Otago, Victoria, and Waikato, which did not comply. Auckland, Lincoln, NMIT, Otago, Victoria, and Waikato since the policies did not treat this theme.

6.4 Discussion

This content analysis encompassed 10 TEI records and information management policies (seven from universities, three from polytechnics) and examined them in the context of Archives New Zealand's mandatory standard (2016b) and its minimum requirements for compliance. Moreover, themes from additional Archives New Zealand's documentation were included in the compliance checklist in an effort to evaluate select areas of comprehensiveness in the policies. In total, 30 codes were generated in order to measure the levels of compliance and comprehensiveness in the TEI policies and the results demonstrated that these levels ranged, in the cases of Massey, UCOL, and Canterbury, from excellent to, in the cases of Auckland and Waikato, somewhat above average.

Several notable themes emerged from this content analysis. First, those coded themes designated as measuring comprehensiveness produced mixed results across the TEI sector: Code 5 (core principles) scored a perfect 2.0, Code 23 (person in charge of monitoring/reviews) 1.7, while Code 3 (corporate ownership of information and records), Code 1 (value of business information to the organisation and its goals), Code 4 (records management is a fundamental corporate function), and Code 2 (records/information as strategic assets) averaged only 1.03. Leaving aside the question of strict mandatory compliance, the poor performance of these themes suggests that more weight could be given to establishing a theoretical basis for the importance of records and information management in the policy documents. Second, the results indicated that there are low levels of emphasis being placed in policies when it comes to detailing or indicating migration strategies to

maintain the accessibility and usability of digital information and records. This lack of emphasis is in contrast to the increasing emphasis that is being placed on migration strategies in records management throughout Archives New Zealand documentation (2014, 2016b, 2016c). Finally, there was also a noticeable, albeit interesting, lack of emphasis placed on the storage and accessibility of physical records and information (Code 29). Accordingly, there is potential scope for future study of this area of (physical) records management both in the context of policies and in general.

7   Capsule overviews of TEI document environments and records management policies

This section presents a series of brief overviews or capsules for the state of each TEI's document environment and records and information management policy. These individual capsules include basic website details, together with a series of rankings based on the primary results obtained in the preceding research. The provision to make comments affords the opportunity to account for any commonalties, themes, and patterns.

7.1   University of Canterbury

Type of institution: University
Website: https://www.canterbury.ac.nz/
Policy hub web address: https://www.canterbury.ac.nz/about/governance/ucpolicy/
Records and information management policy link: https://www.canterbury.ac.nz/media/uc-policy-library/general/Records-Management-Policy.pdf

Policy hub ranking: =1st (39/56)
Records management policy coded theme ranking: =1st (22/23)
Records management policy compliance and comprehensiveness ranking: 3rd (53/60)
Overall TEI ranking: 1st

Comment(s): the most consistently ranked TEI in all three categories, even though there is room for considerable improvement with respect to the policy hub.

7.2   Massey University

Type of institution: University

Website: https://www.massey.ac.nz/

Policy hub web address: https://www.massey.ac.nz/massey/about-massey/policies-procedures/policies-procedures_home.cfm; formerly:

http://www.massey.ac.nz/massey/staffroom/policy-guide/university-management/university-management_home.cfm (link no longer active)

Records and information management policy link:

https://www.massey.ac.nz/massey/fms/PolicyGuide/Documents/i/information-records-management-policy.pdf?FE7D10C8ECE52270C8996B9471811E45

Policy hub ranking: 9th (26/56)

Records management policy coded theme ranking: 2nd (21/23)

Records management policy compliance and comprehensiveness ranking: 1st (59/60)

Overall TEI ranking: 2nd

Comment(s): a disparity exists between low policy hub ranking and exemplary policy rankings.

7.3   Universal College of Learning

Type of institution: Polytechnic

Website: http://www.ucol.ac.nz/

Policy hub web address: http://www.ucol.ac.nz/Policies-and-Procedures

Records and information management policy link:

http://www.ucol.ac.nz/Policy/Recordkeeping%20Policy.pdf

Policy hub ranking: 8th (29/56)

Records management policy coded theme ranking: 3rd (20/23)

Records management policy compliance and comprehensiveness ranking: 2nd (55/60)

Overall TEI ranking: 3rd

Comment(s): a disparity exists between low policy hub rankings and excellent policy rankings.

7.4 Lincoln University

Type of institution: University

Website: http://www.lincoln.ac.nz

Policy hub web address: http://www.lincoln.ac.nz/footer/lu-policy-library/home/

Records and information management policy link:

http://dotnetrest.lincoln.ac.nz/O365flowClient/cache/sites/lpp/Published/Records%20Management%20Policy.pdf

Policy hub ranking: 3rd (38/56)

Records management policy coded theme ranking: =6th (16/23)

Records management policy compliance and comprehensiveness ranking: 6th (48/60)

Overall ranking (of 10 TEIs): 4th

Comment(s): a strong correlation exists between policy coded theme ranking and policy compliance ranking.

7.5 Nelson Marlborough Institute of Technology

Type of institution: Polytechnic

Website: https://www.nmit.ac.nz/

Policy hub web address: https://support.nmit.ac.nz/downloads/our-policies

Records and information management policy link:

https://support.nmit.ac.nz/downloads/files/records-management-policy/download

Policy hub ranking: 7th (30/56)

Records management policy coded theme ranking: 4th (19/23)

Records management policy compliance and comprehensiveness ranking: 4th (50/60)

Overall TEI ranking: 5th

Comment(s): disparity exists between low policy hub ranking and very good policy rankings.

7.6   University of Auckland

Type of institution: University

Website: http://www.auckland.ac.nz

Policy hub web address: https://www.auckland.ac.nz/en/about/the-university/how-university-works/policy-and-administration.html

Records and information management policy link: https://www.auckland.ac.nz/en/about/the-university/how-university-works/policy-and-administration/university-organisation-and-governance/records-management/records-management-policy-.html

Policy hub ranking: =1st (39/56), 1st equal

Records management policy coded theme ranking: 8th (15/23)

Records management policy compliance and comprehensiveness ranking: 9th (42/60)

Overall ranking (of 10 TEIs): =6th

Comment(s): disparity exists between good policy hub ranking and poor policy rankings.

7.7   University of Otago

Type of institution: University

Website: https://www.otago.ac.nz/

Policy hub web address: https://www.otago.ac.nz/administration/policies/index.html

Records and information management policy link:

https://www.otago.ac.nz/administration/policies/otago004048.html

Policy hub ranking: =5th (32/56)

Records management policy coded theme ranking: 9th (14/23)

Records management policy compliance and comprehensiveness ranking: =4th (50/60)

Overall ranking (of 10 TEIs): =6th

Comment(s): disparity exists between good policy hub and policy compliance and comprehensiveness rankings and relatively poor coded theme ranking.

7.8   Victoria University of Wellington

Type of institution: University

Website: https://www.victoria.ac.nz/

Policy hub web address: https://www.victoria.ac.nz/about/governance/strategy

Records and information management policy link:

http://www.victoria.ac.nz/documents/policy/governance/records-management-policy.pdf

Policy hub ranking: =5th (32/56)

Records management policy coded theme ranking: =6th (16/23)

Records management policy compliance and comprehensiveness ranking: 7th (47/60)

Overall ranking (of 10 TEIs): 8th

Comment(s): performance across all three rankings reasonably reflects final ranking.

7.9   Ara Institute of Canterbury

Type of institution: Polytechnic

Website: http://www.ara.ac.nz

Policy hub web address: https://www.ara.ac.nz/about-us/policies

Records and information management policy link:

https://www.ara.ac.nz/__data/assets/pdf_file/0014/220352/CPP114-Information-and-Records-Management.pdf

Policy hub ranking: 10th (23/56)

Records management policy coded theme ranking: 5th (18/23)

Records management policy compliance and comprehensiveness ranking: =8th (45/60)

Overall policy ranking (of 10): =9th

Comment(s): disparity exists between the coded theme ranking and policy compliance and comprehensiveness ranking, which no doubt would have been mitigated with the inclusion of CPP114a.

7.10 University of Waikato

Type of institution: University

Website: https://www.waikato.ac.nz/

Policy hub web address: https://www.waikato.ac.nz/official-info/index/policies

Records and information management policy link:

https://www.waikato.ac.nz/__data/assets/pdf_file/0006/129237/Records-Management-Policy.pdf

Policy hub ranking: 4th (35/56)

Records management policy coded theme ranking: 10th (13/23)

Records management policy compliance and comprehensiveness ranking: 10th (42/60)

Overall ranking (of 10 TEIs): 90/139 = 65%; 24 points

Comments: strong disparity between good policy hub ranking and very poor policy rankings; strong correlation between policy coded theme ranking and policy compliance and comprehensiveness ranking.

8 Conclusion and future research

The main objective of this study was to provide a current and comprehensive overview of the state of publicly available information and records management policies found on the websites of TEIs. To achieve this objective, this study endeavoured to address three key areas:

- The nature of TEI document environments or policy hubs;

- The general form and structure of the records management and information policies found within these hubs;

- The ostensible level of the regulatory compliance and comprehensiveness of these policies with respect to the PRA and associated mandatory standards, as well as other supporting documentation.

Following the completion of the research into and the analyses of these three areas, the modest objectives of this study have for the most part been realised. It has been demonstrated that the policy hubs were often found wanting in several aspects, especially

when viewed in relation to the level of detail present in and degree of compliance exhibited by the records and management policies themselves. Furthermore, in terms of the TEI sector as a whole, while the universities outperformed polytechnics in some areas, there were occasions equally when the reverse held true especially with respect to the content and form of the policies. Overall, it is hoped that this research has established effectively the general anatomy of TEI records management policies, the reasonable degree to which these policies meet legislative compliance, and the nature of the environments within which these documents are housed and made available to the public.

The desire for the results of this examination to add to the growing LIS literature and body of knowledge based around the PRA and to prove to be of some value to those engaged in information-based areas, such as recordkeeping and policy, as well as constitute a useful resource for the present and provide a benchmark for future comparison and study was stated at the outset that of this study. Indeed, with reference to point of further study, there exists the potential for much future research to be conducted. In particular, over the next few years the existing records management policies will have been revised as per their review cycles, whereupon the resulting documents ideally should reflect even more readily any changes to Archives New Zealand requirements. Furthermore, it is possible that more TEIs will make their policies publicly available in future. Indeed, the Otago Polytechnic, subsequent to the data collection phase for this study, recently added a records management policy to their document environment. Beyond the TEI public sector, there is also the potential to study records management policies in the local government and health sectors and, perhaps, to cross compare. Finally, there is the potential scope to include organisations directly in future content analysis research of policies, even if only to secure a chronological data set of past documents.

Appendix A

The six TEIs that did not possess document environments or policy hubs sufficient for analysis were as follows:

- Auckland University of Technology – (the closest to a policy hub was the *Official AUT publications* page: https://www.aut.ac.nz/about/auts-leadership/official-aut-publications)

- Open Polytechnic – no evidence of hub found

- Te Wānanga O Aotearoa – (there was only a reference to a presumably internal policy hub: https://www.twoa.ac.nz/Hononga-Stay-Connected/News-Events/2016/02/16/Melanie-keen-to-share-policy-advice)

- Te Wānanga O Raukawa – (the closest to a policy hub was the *Documents & Reports* page: https://www.wananga.com/wananga-documents.html)

- Te Whare Wānanga O Awanuiarangi – (the closest to a policy hub was the same *Documents & Reports* page found in the case of Te Wānanga O Raukawa: https://www.wananga.com/wananga-documents.html)

- Whitireia Community Polytechnic – no evidence of hub found

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Word count (excluding title page, abstract, contents, bibliography, and appendix): 18005