



## U3A Canberra POLICY No. P60

Document Management Policy	
<b>Publication date:</b> 19 June 2024	<b>Applies to:</b> All members
<b>Responsible person:</b> Secretary	<b>Scheduled review date:</b> At least once every three years
<b>Approved by:</b> Committee meeting 13 May 2024	<b>Author:</b> Tom Flynn (Secretary) and Peter Sheldrake (Committee Member)

### PURPOSE

This policy sets out the rules for managing U3A ACT Inc (U3A) documents compliant with the *Incorporations Associations Act 1991* (the Act), U3A's Objects and Rules (Rules) and other U3A policies, in particular, the Privacy Policy and U3A's specific policies for the management of its documents. See below for these policies.

### INTRODUCTION

U3A documents are those which are required or need to be retained to ensure the proper conduct of U3A business. They are generated by:

- Committee processes
- External contracts and commitments
- Management coordinators and their teams
- Members (when members' activities relate to documents defined as U3A documents).

U3A documents include:

- U3A's Objects and Rules, register of members, accounting records, and other documents required to be kept by law or under the Objects and Rules
- Committee papers and meeting records
- Committee-approved documents
- Official publications
- Operational procedures
- Key emails
- Manuals
- Records of Sub-Committees and working groups (should these be generated)
- Images, video and sound recordings relevant to U3A's history.

Note U3A documents do not include working drafts, notes or papers in development or course materials which are the property of course presenters.

The Act and the Rules set out a number of requirements for managing access to U3A documents. These follow below. In addition U3A has prescribed a number of policy requirements for the management of documents which follow the requirements of the Act and the rules.

## **REQUIREMENTS OF THE ACT**

Members have the right to obtain a copy of:

- U3A's Objects and Rules
  - A summary of the minutes of any Committee meeting and
  - U3A may charge a fee (Section 35) for this service.
- The Committee may refuse to give a member access to:
    - the Objects and Rules, or Committee meeting minute summaries or
    - any other documents that the Rules allow a member to access, if the Committee is satisfied that access would be prejudicial to U3A's interests (Section 35A).
  - The Rules can provide the circumstances under which access to such documents will be either allowed or restricted, including requiring a member to state the purpose for which they want access (section 35A).
    - No rule of this type has been made by U3A at the date of this Policy.
    - And it is U3A policy that the Objectives and the Rules be made available to members and others on U3A's website.
  - A U3A member may apply to the Committee to inspect the Register of Members (Section 67A), and:
    - the Committee must refuse access if complying would give access to any personal information that is protected under the Act (by Section 67B).
    - the Committee may refuse access if it is sought for a purpose:
      - not directly related to the management or the purposes of U3A
      - prohibited by the Rules (such a rule has not been made at the date of this policy)
      - that the Committee is satisfied is improper.
  - A member can request the Committee to restrict access to their personal information in the Register of Members (Section 67B), and the Committee must do so if it is satisfied special circumstances justify the request. If the Committee refuses a request the member may initiate U3A's dispute resolution process and access cannot be given to the member's personal information without their consent for 28 days.

## **U3A RULES REQUIREMENTS**

- The Secretary must keep in their custody or under their control all records, books and other documents relating to the association (Rule 20).
- The Treasurer must keep correct accounts and books showing the financial affairs of the association (Rule 21 2(b)).
- The records, books and other U3A documents to be open to inspection, free of charge, by a member of U3A (Rule 44).

## U3A POLICY REQUIREMENTS

The Committee has approved the use of a **Central Electronic Repository (CER)** and its sister **CER2** as the repositories for the electronic storage of U3A documents. Together they constitute the official record of U3A. Both repositories are stored on Google Drive.

The Committee has created the positions of **Document Management Officer (DMO)** and **Assistant Document Manager (ADM)**. Both are appointed by the Secretary and are authorised to maintain the CER and its sister CER2 repository which holds restricted access documents. The DMO Team must comply with all policies related to the storage of U3A documents, particularly the approval of documents to be repositied. The DMO may delegate document management tasks to the ADM as they consider appropriate. Both positions report to the Secretary.

**Document Authoriser** is a person authorised by the Secretary (with the assistance of the DMO) to approve a document to be kept as an official record of the U3A. Commonly document authorisers are U3A Managers or document authors.

The relevant U3A Manager must regularly advise the DMO who is entitled to access documents and whose access should be withdrawn.

### Detailed U3A Policy Requirements

1. At a detailed level the DMO:
  - 1.1. Is authorised to add, amend, or delete documents in the CER in accordance with this Policy and as requested by Document Authorisers.
  - 1.2. Cannot make changes or deletions to documents, files or folders without authorisation from a Document Authoriser or the Secretary.
  - 1.3. Ensures documents are filed according to a documented filing system.
  - 1.4. Manages access to the CER as required by the Committee, or as required by the Act or a rule.
  - 1.5. Ensures that regular and appropriate back-ups of the CER are undertaken.
2. The Secretary, acting on advice from the DMO, has authorised the creation of four categories in the CER as follows:
  - 2.1. Available to the general public (Category G)
  - 2.2. Available to all members (Category M)
  - 2.3. Available to current Committee Members (Category C)
  - 2.4. Restricted access document (Category R).
3. Documents can be accessed according to each category:
  - 3.1. Category G are Read Only documents accessible from the U3A public website.
  - 3.2. Category M are Read Only documents accessible to all members as determined by the Committee.
    - 3.2.1. The Committee will endeavour to ensure that copies of Category G and M documents are available on request to the Secretary for members who do not have access to the Internet.
  - 3.3. Category C are Read Only documents accessible from the CER to all Committee members and Managers as approved by the Secretary.
  - 3.4. Category R are sensitive Read Only documents in the Complaints folder of the CER2 repository. It generally contains sensitive documents or issues relating to a specific issue. Access is limited to the Secretary and President. The DMO has

automatic access to load and remove Committee members and remove documents as agreed by the Secretary.

4. New or amended documents may only be added to the CER if they have been authorised by an approved Document Authoriser (most commonly the creator of the document).
  - 4.1. A document authoriser may delegate authority, but only for sections of the CER for which they have responsibility, and they must inform the DMO of the delegation. Document Authorisers must provide documents to the DMO for filing in the CER. Official copies of all U3A documents are held in the CER.
  - 4.2. Documents which do not originate in electronic format must be converted to electronic format and filed in the CER.
  - 4.3. Originals should then be destroyed.
  - 4.4. In exceptional circumstances, some items may also require filing as hard copies:
    - 4.4.1. The Secretary will decide which documents should be held as hard copies.
    - 4.4.2. The CER copy of a hard copy document should note the location of the hard copy.
5. Documents may only be added to the CER, moved within it, or deleted from it by those who are approved to do so by the Committee. The persons approved are:
  - 5.1. The DMO (or Assistant Document Management Officers who have authority as delegated by the DMO) or
  - 5.2. The Secretary in consultation with the DMO
  - 5.3. Deleted documents may be retrieved by contacting the DMO.
6. Documents should be retained or securely destroyed according to timeframes dictated by the specific laws, policies or Committee decisions that apply to the documents or classes of documents.

There are three categories of documents for retention purposes:

- 7.1 Keep permanently.
  - 7.2 Keep for 2 years and then delete. This is the default setting.
  - 7.3 Keep only as long as current and then delete.
7. This policy does not prohibit volunteers printing hard copies of documents to assist in operational activities.
  - 8.

## SOURCES

- ACT Associations Incorporation Act 1991 - <https://www.legislation.act.gov.au/a/1991-46/>
- Australian Charities and Not-for-profits Commission Act 2012 - <https://www.legislation.gov.au/Details/C2012A00168>
- Australian Charities and Not-for-profits Commission (ACNC) record-keeping requirements - <https://www.acnc.gov.au/for-charities/manage-yourcharity/obligations-acnc/keep-charity-records>
- U3A-ACT Inc. Objects and Rules - <https://www.u3acanberra.org.au/get/191205.pdf>