



Policy on Public Access to Information and Secrecy

Guidelines on handling official documents, public access to information and secrecy at Karlstad University

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1. The principle of public access to information

The principle of public access to information means that the public and mass media are entitled to receive information about state and municipal activities. This principle can be manifested in various ways, such as freedom of speech, freedom of the press, freedom of communication for officials, and access to court hearings. Another example of the right to information is public access to official documents.

Ever since 1766, with the introduction of the first Freedom of the Press Act, access to official documents has been a right in Sweden. This means that practically everyone, Swedish citizens and citizens of other countries, has the right to read documents from Swedish authorities. This right is, however, restricted in two senses. Firstly, not all documents of a public authority are considered official documents, and secondly, some official documents are secret.

2. The principle of public access to information and the General Data Protection Regulation

The General Data Protection Regulation (GDPR, EU 2016/679) came into effect in all member countries of the European Union on 25 May 2018. The GDPR brings about a number of changes in the processing of personal data and improves individuals' rights to privacy.

Karlstad University is the personal data controller for the processing of personal data as part of University operations. All personal data processing must comply with the basic principles stipulated in the GDPR. Simplified, these principles entail that data may only be collected for legitimate purposes, data must be limited to what is necessary, and data may not be stored for longer than necessary.

However, the GDPR does not hinder the data processing necessary for public authorities to fulfil their obligation to provide official documents according to the principle of public access to information.

3. What constitutes an official document?

Ch. 2, Sec. 1 of the Freedom of the Press Act (TF) states that Swedish citizens have the right to access official documents.¹ In order that a public authority can decide which documents it must provide access to, the difference between a document and an official document must be clear.

A document is a written production, or an image or recording, which can be read, listened to, or in any other way requires technical aids for comprehension. The term document does not only denote a sheet of paper with print or images, but also recordings and electronically stored material. The right to access documents is independent of the

¹ Citizens of other countries have a corresponding right according to Ch. 14, Sec. 5 of the Freedom of the Press Act, provided no other provisions in the act or other acts override this.

medium of production. Content is conclusive – not the format in which the information is stored. In short, a document is an object containing information of some kind.

The main principle is that all documents are official if they are

1. held by public authorities, and
2. considered received or drawn up by the authority.

With ‘held’ is meant that a document can be read, listened to or in some other way be comprehended with technical aids at the authority. However, the document does not have to be available physically at the authority in order to be considered ‘held’ there. A document which is temporarily held at the home of an official, or is held by someone else from whom the authority can easily recover the document, is still considered held by the authority.

A document is considered received by the authority when it has arrived at the authority or is in the hands of the official in charge of the matter to which it refers. This means that mail addressed to the University becomes an official document on arrival.² If a document is not sent directly to the authority’s address (delivered in person, sent to a home address, etc.), it is considered received when it has been received by an authority employee. It does therefore not matter where the official is when the document is received.

A document drawn up at the authority is considered official when it has been dispatched, that is, i.e. sent from the authority or been available for collection.³ A document which has not been dispatched is official when the matter to which it pertains has been completed or concluded at the authority. If the document does not pertain to a specific matter, it is considered official when it has been approved or otherwise completed.

Special regulations apply to certain types of documents in terms of when they are considered official. This, for example, pertains to the register and other lists of continuous notes (when the document is completed and effective), verdicts and decisions (on delivery or dispatch), and the authority’s minutes and equivalent documents (when approved or otherwise completed).

Notes, outlines or other material are not considered official, provided they have not been dispatched or registered.

4. Public access to information and secrecy

Official documents can be public or secret. In principle, an official document is public. In certain cases, there may be reason to mark parts or whole documents as secret. The right of access to official documents may only be restricted by legal provisions (TF Ch. 2, Sec. 2).

The provisions of the Public Access to Information and Secrecy Act (OSL; 2009:400) determine if an official document is public or not. Secrecy can only apply to information in an official document if there is a specific provision made in the OSL and the issue of secrecy must be considered in each individual case.

² Messages addressed to an official in person are not official documents if the content is strictly personal.

³ The Freedom of the Press Act has many provisions on when a document is considered drawn up at an authority, which may lead to difficult judgements. If there is any doubt, consult the registrar or the University’s legal experts.

'Secrecy' means a prohibition on disclosing information whether orally, or by making an official document available, or in any other way (OSL Ch. 3, Sec. 1). This applies even if the secret information is not documented in an official document. Oral information not yet documented and information in documents not yet official can also be classified as secret.

The prohibition on disclosing secret information applies to both the public and to other authorities. The prohibition also applies within the public authority. Only the staff requiring the information to perform a duty may take part of the secret information.

4.1 Information classified as secret

Marking information as secret in an official document is only permitted if it is on the grounds of a legal provision. If no legal reference can be made, the document is public (TF Ch. 2, Sec. 2; OSL Ch. 8, Sec. 1).

When an official document is requested by a citizen or another public authority, secrecy must be determined in each individual case. The authority may already have marked specific information in the document as secret. Such a note is meant to alert officials. If an official document is requested by a citizen, a decision has to be made whether secrecy applies to the information.

Examples of secrecy

According to OSL Ch. 21, Sec. 7, secrecy applies to **personal data**, if revealing such information can be assumed to contravene the General Data Protection Regulation. Before information is provided, the recipient's handling of personal data must be assessed. If it can be assumed that data will be processed in contravention of the GDPR, such data may not be provided.

Secrecy can apply to information given by a company in connection with **commissioned research or degree projects**. Secrecy applies if there is reason to assume that the project was commissioned on condition that information was not disclosed (OSL Ch. 31, Sec. 12). The extent of secrecy is normally specified in the agreement between the University and the company.

Secrecy can also apply to information obtained by companies in **partner projects**. OSL Ch. 24, Sec. 5 provides: "Secrecy shall apply at higher education institutions to protect information on individual business or operational circumstances, inventions or research results given or yielded by research, which has been pursued in cooperation with an individual, if there is reason to assume that the individual has participated in the cooperation on condition that the information shall not be disclosed."

Secrecy also applies to information on an individual's personal or medical circumstances as part of **personnel and social welfare services** (OSL Ch. 39, Secs 1-3). The same applies to information on an individual's medical, psychological or other personal circumstances.

Secrecy applies to information on an individual student's identity, address and other similar information if there is special reason to assume that the individual or another party or a person closely related to him/her will be harmed if the information is disclosed (OSL

Ch. 23, Sec. 5, Par. 2).⁴ Students' identities may be protected for various reasons and they are then given special aliases in Ladok to avoid identification. Secrecy issues pertaining to students' personal information should be discussed with the officer responsible for the academic record system (Ladok).

There are very few secrecy provisions allowing for secrecy to apply to all situations. However, an example of such a secrecy at the University is information obtained by **switchboard** staff in connection with "a telephone call to and from another person at the authority" (OSL Ch. 40, Sec 4).

Secrecy also applies to "**libraries** keeping record of an individual's loans, reservations, or another form of order and keeping record of an individual's information technology use" (OSL Ch. 40, Sec. 3).

Appendix 1 presents examples of regulations in the public access to information and the secrecy act that may pertain to university operations.

4.2 Handling confidential documents

Normally, it is the expert (administrative officer or researcher) who can decide whether a received or drawn up document contains confidential information and should be marked "Secret". Such a note should include the appropriate secrecy classification, the date, and that it was made by Karlstad University (OSL Ch. 5, Sec. 5).

The following procedure applies to documents with information from businesses submitted in connection with commissions or partner projects.

The company should, according to its agreement with the University, make a note on a document if it contains confidential information.

If the company has not made a note of secrecy on the document, an expert must examine the content and, if needed, mark it "Secret."

Official documents subject to secrecy must be registered and registered in such a way that no information marked secret is indicated (OSL Ch. 5, Secs 1–2). When registered, the applicable secrecy provision is noted, as well as the date. Upon registration, details of sender, receiver and content may be omitted if required by the secrecy provision.

The requirement that secret documents must be registered has to do with ensuring that an authority has control of its secret documents and that it is easy to determine which secret documents an authority holds.

4.3 The prohibition on disclosing secret information

The prohibition on disclosing confidential information applies to the University as an authority and to employees and others who have received the information while in office

⁴ A memorandum with information on procedures for protecting a student's identity is available from the Ladok officer and on the intranet.

or as participants (OSL Ch. 2, Sec. 1). A staff member shall therefore maintain secrecy even when no longer employed at the authority.

In principle, the prohibition on disclosing information also applies within the University. Only an employee who needs the information to process a matter or to perform a duty has the right to take part of the secret information.

A violation of secrecy can mean that the University is liable under the provisions of existing agreements or laws. The person who is responsible for the disclosure can also be liable, depending on circumstances.

Violation of confidentiality due to carelessness can result in a fine. If there is intention, the penalty can be a fine or imprisonment up to one year (Penal Code Ch. 20, Sec. 3).

4.4 How is secrecy determined?

Determining that information in an official document is subject to secrecy can only be done on the grounds of a direct reference to a paragraph in the OSL. There must be a provision protecting the case in question. The provisions of the law, however, are seldom unconditional. Secrecy is often fixed in time and an assessment of potential injury or harm must be considered on a case-by-case basis, which means that assessment difficulties arise. It is advisable to contact the registrar or the University legal services with any questions.

The first step in determining if information is confidential or secret is to ascertain if the information pertains to any of the interests to be protected as specified in the OSL. On the basis of the applicable provision, consideration is then given to the potential damage or harm inflicted on those concerned if the information were to be disclosed. The damage assessment is based on the requisites specified in the provision, the so-called “requirements of damage.”

The rules on time limits are normally provided in the respective legal provision in terms of a number of years, for example, ten, fifty, or seventy years. The risk of damage is generally assumed to decrease over time. Within the timeframe specified, the issue of whether information can be disclosed is decided on the basis of the damage risk at the time of the request.

4.5 Regulations pertaining to examinations

In written examinations, the exam paper becomes an official document once it is provided, i.e. handed out, to students in the exam hall. However, there may be reasons to refuse handing the exam paper to any other persons than the students before the test has been taken. The reason is a special secrecy provision pertaining to examinations (OSL Ch. 17, Sec. 4):

“Secrecy applies to tasks that are included in or form the basis for a knowledge test or psychological test under the auspices of an authority if it can be assumed that the purpose of the test is counteracted if the task is revealed.”

Secrecy applies for the duration of the exam. On completion, the exam paper is usually a public document, as the risk of damage no longer exists.⁵

The student's exam submissions to the University is a received document and therefore official. There is no prohibition against releasing exam submissions and anyone may request to read or copy an exam.⁶

5. Providing an official document

5.1 Request for an official document

If a person wants to read a document, two questions must be considered:

- Is the document official or not?
- Is the document public or not?

If the document is not official, there is no reason to provide it. There is no prohibition against providing a document (provided that it does not contain confidential information), but no one can demand access with reference to the public access to information principle.

Official and public

If the document is official and public, it must be provided “immediately or as soon as possible” to the person requesting it for reading, listening, or perceiving it in any other way. The document shall be made available free of charge at the authority's premises (TF Ch. 2, Sec. 12).

A person requesting a document has the right to a transcript or copy of an official document. Such a request must be speedily considered (TF Ch. 2, Sec 13).

Official but secret

If the document is official but subject to secrecy, it cannot be provided.

If the document is secret in parts, the public parts can be provided, for example by copying the document with the secret information covered/blacked out.

Note that secrecy to protect the individual as a general rule does not apply to the individual him/herself. This means that secret information may be provided to the person concerned, and the person can approve the disclosure of the information to another person, provided that nothing else applies pursuant to provisions in the OSL (Ch. 12, Sec. 1–2).

5.2 Who decides on providing official documents?

In many cases, official documents are provided without the need for judgement calls.

⁵ Some exceptions include standardised tests, which are designed to be reused in part or as a whole. Tasks in such tests may be classified secret for a long time.

⁶ Cf. the Parliamentary Ombudsman (*Justitieombudsman*, JO) decision of 18 July 1991, ref. no 3980-1990 in which JO decides that exam papers with the examiner's written comments shall be considered documents drawn up by the authority and are not official documents that must be provided until a grade has been awarded.

Certain documents can be distributed routinely, for example, old exams, syllabi, course evaluations, etc.

The decision to provide an official document is primarily made by the employee in charge of the document or by the respective registrar or head registrar (OSL Ch. 6, Sec. 3). When in doubt, consult the immediate head, the registrar or the University's legal experts immediately.

A request for access must be processed urgently, which means that case management and decision-making should ideally take place the same day and should normally not take more than one or two working days. Assessments that are more complex can take longer.

Appendix 2 presents a schematic illustration of the assessment of whether a document shall be provided.

5.3 Anonymity

A person who requests official documents has the right to be anonymous. The authority may not demand that a person who wishes to obtain an official document identifies him/herself or state what the document is to be used for. The only exception is if the authority needs it to make a secrecy assessment (TF Ch. 2, Sec. 14).

5.4 How are official documents made available?

5.4.1 Providing documents on paper or in electronic formats

According to the TF, a person who requests to obtain an official document has the right to take part of it at the authority's premises and obtain a transcript or copy for a fee. The authority is not obligated to provide official documents in electronic form (e.g. e-mail, telefax, sms, CDs).

The provision that official documents do not have to be provided electronically according to the TF does not mean that the University is prohibited from providing documents electronically. Under the service obligations of the Administrative Procedure Act, the University can make official documents available electronically on request, provided this is not deemed inappropriate.⁷ The appropriateness of electronic provision must always be assessed, as well as its congruence with, for example, the GDPR.

5.4.2 Providing personal data electronically

Note that Swedish law does not oblige authorities to provide public documents electronically. If Karlstad University provides documents that include personal data electronically, the University must ensure that all the requirements of the GDPR are met. This means that severely limited opportunities for providing documents electronically if they contain personal data.

⁷ See also Secs 9–11 of the Ordinance (2003:234) on the time for availability of verdicts and decisions.

An assessment must be made in each individual case, but the principle at Karlstad University is that sensitive personal data, information on criminal convictions, civic registration numbers and other sensitive personal data as well as massive extracts of personal data may not be provided electronically. Other types of personal data may for example be provided via e-mail, given that the University deems it appropriate and in accordance with the stipulations of the GDPR.

It is always Karlstad University in its capacity as personal data controller that unilaterally decides whether a document should be provided electronically. The decision cannot be appealed.

5.4.3 Providing data from official documents

In addition to the right to take part of official documents, there is also an opportunity to request extracts from documents. This right is not regulated in the TF, but results from the OSL. According to OSL Ch. 6, Sec. 4, an authority is obligated to provide extracts from official documents kept at the authority, “if the information is not classified as secret or if it could interfere with due process.” The manner in which such a request for information is handled by the authority must be determined based on the circumstances.

5.4.4 Providing Ladok data

Regarding information in Ladok, this can only be provided electronically in the cases specified in the Ordinance (1993:1153) on academic records at higher education institutions.

5.5 Denying access

If the officer receiving a request of access to an official document makes the judgement that the document cannot be accessed, or can only be provided with reservations or with any other restriction, the officer must inform the applicant that he/she has the right “to refer the matter to the authority” and thus receive a written decision that can be appealed. If the applicant requests a written decision, the registrar or the University’s legal expert must be contacted immediately.

If a person requests a confidential document, the following message should be conveyed (or words to that effect):

“According to a preliminary assessment, the document requested cannot be provided on grounds of secrecy under the provisions of the Public Access to Information and Secrecy Act **Chapter**, **Section**. If you do not accept this response, you can request that the authority reconsiders the matter and receive a written decision that can be appealed.”

The decision is taken by the vice-chancellor in writing and states the grounds for the decision and refers to the legal provision applied. The decision can be appealed with reference to the appropriate body of appeal, which is the Gothenburg Administrative Court of Appeal.

5.6 Decision in cases of conditional access, etc.

If there is a question of providing confidential documents with reservation or after they have been anonymised, the decision is taken by the vice-chancellor. This also applies if confidential documents are to be provided upon the approval to do so by the individual named in the documents, or if an individual requests confidential information on him/herself.

5.7 Should copying fees be charged?

In addition to the right to read official documents at the authority's premises, the public also has the right to receive a copy or transcript of the document. If the request is for ten or more pages, there is a charge. The charge for a request for ten pages is SEK 50. For every additional page, SEK 2 should be charged. A postage cost is charged if the consignment weighs more than 20 grams (Secs 15–22 of the Charge Ordinance).

There is no regulation in the Charge Ordinance on the provision of official documents in electronic formats, but according to court practice, it may be possible to also charge for providing such documents.⁸

6. Registration

6.1 General

There is a register [*diarium*] in which a public authority's official documents are recorded. Registering official documents is a practical way for the authority to keep order and to find documents quickly, as well as to have an overview of incoming and drawn up official documents.

In this register, all documents belonging to the same matter are given the same registration number and are registered under this number irrespective of when they were drawn up or received.

6.2 Registration units and series

Karlstad University registers all official documents in an electronic case management system. Registration is done at the Faculty of Health, Science and Technology, the Faculty of Arts and Social Sciences, the office of the Board for Teacher Education, and Central Services units (including the University Library). Each unit has its own sequential number series in the register.

Although the registration units are in practice independent of each other, they are really part of one single register. Authorised personnel can therefore gain access to the whole system to find information. The register is only divided for reasons of practicality; this does not mean that the different registration units are independent of each other, as they all form part of Karlstad University's register as a public authority.

⁸ See case no 4805-14 of the Stockholm Administrative Court of Appeal. Sec. 4 of the Charge Ordinance stipulates that an authority at a charge may provide for instance automatically generated data processing information in another form than a paper copy. The authority may decide on the basis of the charge levied as per this provision, on the principle of full cost recovery (Charge Ordinance sec. 5).

An official document should therefore never be registered in more than one series to avoid the problem of knowing where the document is kept.

6.3 What must be registered?

The general principle is that all official documents must be registered. Exceptions are documents that are produced in great numbers and can be kept in other ways. Examples of official documents that must be registered are listed in Appendix 2. When in doubt, contact the registrar.

The Freedom of the Press Act (TF Ch. 2, Sec. 3) defines an official document as “a written production or an image or recording, which can be read, listened to, or in any other way requires technical aids for comprehension.” The term ‘document’ does not only denote a sheet of paper with print or images, but photos, recordings and electronically stored material may also be official documents.

Documents sent from the University are considered drawn up and thus are official documents when they are dispatched. An official document must be registered and given a number before being sent off and a copy (print on one side according to RA–FS 2010:2) must be archived.

6.4 When must official documents be registered?

Official documents must be registered on submission to the authority or when drawn up at the authority (OSL Ch. 5, Sec. 1).

This means that a submitted official document should be registered on the day of arrival to the authority or when it is made available to the officer in charge, preferably in connection with the opening of mail (letters, e-mail, fax) or on delivery.

The opening of mail must therefore be managed effectively. All mail should be opened and date stamped on the day of arrival. This also applies to mail addressed to a person or to an employee’s home address or in other places than the University if it is official business.

6.5 Should internal documents be registered?

Some documents can be considered drawn up (completed) when they have been processed, for example, minutes, decisions or information on measures to be taken. Such documents must therefore be registered when they are sent out. If the document is sent to Central Services, this is where it should be registered.

Documents in the form of drafts of decisions or internal referrals that are sent between faculties/departments are not official documents and need not be registered (TF Ch. 2, Sec. 8).

6.6 Documents of little significance

Some examples:

- Marketing material
- Invitations to courses and conferences
- Leaflets
- Routine requests (e.g. questions of the course or programme offering)
- Minutes of external meetings received for information (registered where they are drawn up)

6.7 Documents filed in other ways

Some official documents are produced in great numbers and/or are of a routine nature. Such documents are not as a rule registered but are stored in other ways.

A large part of the University's official documents is not registered. This applies to most of the documents pertaining to the administration of education, research and financial management. Some documents are recorded in other systems than the register, for example those pertaining to student registration, University finances and staff recruitment.

As regards the question of what documents to register and which to file in other ways, it is important that routines are as uniform and consistent as possible.

It is also important to remember that even when official documents do not need to be registered, they must be handled according to procedure. These documents must be kept in some order so that it is possible to determine, quickly and easily, whether they have been received or drawn up if they are requested. The easiest way of doing this is to keep them in one place and arrange them chronologically, alphabetically, or numerically.

7. Mail

At Karlstad University, mail is opened at the faculties, the office of the Board for Teacher Education, as well as at the Central Service units. An appointed person with knowledge of current regulations opens the mail, applies a date stamp, and enters relevant documents into the official register, before the mail is delivered to addressees. The person opening mail must always decide whether a document should be registered. This applies to both paper mail and e-mail.

7.1 Mail addressed to an individual

University employees should as far as possible avoid private mail to and from the University. An appointed person with knowledge of current regulations shall open mail. Personally addressed mail (the name of a person is placed first) may not be opened without the addressee's specific consent. In order to fulfil the requirements of the law in regard to immediate registration while protecting personal integrity, it is recommended that employees authorise the appointed mail opener to open all incoming mail to the University.

If an employee refrains from consenting, the appointed mail opener will not open personally addressed mail. To meet the requirements of the law in regard to immediate registration it is important that the employee should acquire the necessary knowledge to determine whether incoming documents need to be registered and to ensure that the registrar is promptly notified.

Heads are responsible for ensuring that staff are informed of the obligation to register official documents without delay.

8. E-mail as official document

Incoming e-mail messages to University staff from external senders are classified as official documents delivered to the authority in the same way as conventional mail. According to the principle of public access to information, this means that anybody has the right to take part of such messages, provided that the content is not confidential, and that the authority is obliged to consider a request to partake of such as message in the same way as with other incoming mail to the authority.

8.1 Official documents

Incoming e-mail to Karlstad University from another authority or private person is an official document as soon as it has arrived at any one of KaU's e-mail servers, if the message in any part concerns a matter of or a question regarding the authority's operations.

E-mail sent from Karlstad University to an external addressee is classified as dispatched and hence drawn up. It does not matter whether the content is considered completed.

The general principle is that e-mails only sent internally at KaU do not constitute official documents upon sending. This also applies to sms and mms messages sent between KaU mobile phones.

Sms and mms messages sent and received on KaU mobile phones may under certain circumstances be classified as official documents.

The information on messages in logs/lists always constitutes official documents.

E-mails in KaU's e-mail system are considered stored by the authority.

Exception

Some documents never become official unless they are archived, for example, drafts for decisions, notes that do not pertain to the documentation of a matter, and internal information.

8.2 Private e-mail

As a general principle, Karlstad University staff should not use their University e-mail addresses for private matters, as correspondents may have difficulties distinguishing

between staff members in their capacities as officials at a public authority and private individuals. If an employee uses the University e-mail address for private messages, these should be placed in a folder entitled “Private”. All e-mails at the University fall under the public access to information principle, and it is therefore important to be able to distinguish private e-mail from the authority’s correspondence.

8.3 Registering e-mail

E-mail must be registered to the same extent as incoming and outgoing paper mail. In this way, it is possible to provide an official document directly on request in accordance with the law and to have an internal overview of the documents available at the authority.

Incoming or outgoing e-mails sent to and from an e-mail system and which should be registered must immediately be forwarded to the registrar. Note that attachments must be forwarded too. The registrar registers the e-mail according to current regulations. If the e-mail concerns a new matter, the registrar must send a confirmation to the officer with details of the registration number, etc.

Examples of official documents that do not need to be registered:

- Incoming documents for information only, which have not led to any steps being taken.
- Inquiries and messages of occasional and little significance. Note that they must clearly be of little significance. When in doubt, register it.
- Routine invitations to conferences, courses and seminars addressed to several addressees.
- Routine questions (e.g. “When is the exam?”)

Logs of sent and received e-mails are official documents and such logs are not in themselves protected by secrecy. This means that a journalist, for example, who wants to look at an employee’s e-mail log, has the right to request that. In such cases, logs should be printed out. However, individual e-mails are considered separately in accordance with what has been stated earlier regarding their status as official documents and regarding possible confidentiality.

8.4 Accessibility

E-mail concerning Karlstad University must always be processed according to current laws and regulations, also in a staff member’s absence. Registration and decisions on whether official documents should be provided must be made immediately. Questions from the public must be answered as soon as possible.

It is important that e-mail is checked regularly. For vacation or a shorter period of absence, the automatic reply function must be used to inform correspondents of the period the person is absent and to refer them to an alternative e-mail address (colleague or appropriate address). For longer periods of absence, for example a leave of absence, a decision on how to deal with e-mail must be made in consultation with the immediate head.

8.5 Deleting e-mail

Documents received via e-mail may be deleted in accordance with the University's information management guidelines. Official documents may only be deleted in accordance with the regulations and decisions of the Swedish National Archives. If e-mails are official documents that must be saved and recorded in the register or another filing system, they must be moved to another data carrier and deleted from the private inbox after they have been sent to the registrar or another computer system.

An e-mail directory is not appropriate storage and archival space for official documents, but is comparable to the mail sorting system and physical pigeonholes. If, for example, a notification of illness is received via e-mail, it must be transferred to the appropriate HR system and then deleted from the e-mail system.

All e-mailing involves the processing of personal data. According to the GDPR, personal data may not be stored in a format enabling identification of a person for longer than necessary to fulfil the aims of data processing.

Note that e-mails constitute official documents as long as they remain in the e-mail system. No e-mails may be deleted automatically. E-mails must be manually reviewed before deletion, with the exception of the central spam filter.

The e-mail system may also include documents that are not official, and when they are deleted this is often referred to as 'clearing'. The following are examples of documents that are not official and that therefore may be cleared:

- Drafts, scribbles, concepts and other writings that are not yet completed/drawn up documents or decisions being exchanged as working material within the public authority during the preparation of a matter. There may be circumstances under which internal e-mails pertain to a specific matter and should be added to the documentation. In such cases, the matter must be registered and the material added. This then becomes an official document.
- Notes pertaining to a matter that do not constitute factual documentation, which means that they have not been dispatched or archived.
- Internal referrals, drafts and proposals sent from one public authority to another for the purpose of consultation.
- Messages and information internal to the public authority.
- Personal messages that are clearly private.
- Documents received by persons in another capacity, for example internal party materials sent to a politician or mail sent to a labour union representative. Labour union mail, i.e. information sent from a labour union to a local representative at a public authority, does not become an official document.

Files that are not official documents should continuously be cleared from inboxes and outboxes, and the trash folder must be cleared regularly.

E-mail logs are lists of incoming and outgoing e-mail. These can be regarded as documents of little or occasional significance and may be deleted when they are outdated.

8.5.1 Trash folder

“Junk mail,” such as mass advertisements, “spam” or irrelevant messages that are not related to University operations may be deleted immediately.

Note that all e-mails in the deleted items/trash folder have not yet been deleted, i.e. they are still official documents.

8.5.2 Logs

Logs are deleted in accordance with the University’s information management guidelines. Logs include information on the sender (server and e-mail), recipient, message id, date and subject line.

8.5.3 Backups

The aim of backups is being able to recreate information if the original information in the IT system has been damaged or deleted by accident. The requirements of the IT system determine how long it is possible to restore a backup and how often backups are made.

In some IT systems, users can restore information from backups themselves, but in others only IT Office staff can restore information.

Backups per se are not official documents.

8.6 Secrecy

Documents classified as secret must always be registered. E-mail which may be subject to secrecy must be printed out and registered. Thereafter the e-mail must be deleted both from the e-mail system and the trash folder.

All electronically transmitted information may be leaked to someone else than the intended recipient. Information classified as secret may therefore not be send via e-mail.

Examples of provisions in the Public Information and Secrecy Act that pertain to the University

Reference	Area or grounds for classifying as secret
Ch. 17, Sec. 4	tests and exams
Ch. 19, Secs 1–5	an authority's business operations and natural science or technological investigations for the public good
Ch. 19, Secs 6–8	information prior to labour union negotiations
Ch. 21, Sec 1	information pertaining to individuals' health or sexuality
Ch. 21, Sec. 5	information pertaining to a non-Swedish citizen
Ch. 21, Sec. 7	contravening the GDPR
Ch. 23, Sec. 5	students' personal circumstances confided to a psychologist, counsellor or study advisor; individual students' identities, if there are special reasons
Ch. 23, Sec. 6	student expulsion
Ch. 23, Sec. 1	psychological tests done for research reasons
Ch. 24, Sec. 4	information with dialectological or ethnological content
Ch. 24, Sec. 5	research collaboration with an individual
Ch. 24, Sec. 8	producing statistics
Ch. 31, Sec. 12	commissioned activities
Ch. 39, Secs 1–3	social and staff administrative matters
Ch. 40, Sec. 3	library operations
Ch. 40, Sec. 4	telephone switchboard

Whether there are grounds for marking an official document as secret must be determined on a case-by-case basis. Each case needs to be considered on its own terms. Consult a legal expert when in doubt.

Appendix 2

Examples of public, secret, and non-official documents

Area	Public	Secret	Non-official
<i>Education</i>	Reports of suspected cheating Applications Admissions Theses Requests for reassessment Disciplinary Board decisions Decisions to grant exemptions from mandatory components Disciplinary matters Course syllabi and programme study plans Course registrations Course evaluations ⁹ Course reading lists Submitted papers and essays Graded exam papers Schedules Student complaints Results and grades Exam questions and keys Appeals	Library loans Teachers'/Students' psychosocial circumstances Protected personal data (in certain cases) Exam answers ¹⁰ Information from counsellors, study advisors and Student Health Services Some degree projects (done at companies)	Teacher's notes, exercises and other documents continually used for teaching Manuscripts for textbooks and articles (created as side-line occupations) Drafts of doctoral theses/equivalent Drafts of essays and other assignments
<i>Research</i>	Research funding applications Doctoral theses Research funding agreements Decisions of examining committees Decisions on funding allocation Reports	Questionnaire responses and interviews Sensitive business information ¹¹ Patient information	Drafts and concepts Personal notes from meetings, seminars, laboratory activities, excursions, archives, etc.
Area	Public	Secret	Non-official

⁹ Including compilations of received course evaluations alongside comments.

¹⁰ During ongoing examinations/tests, as well as those related to standardised tests equivalent to psychological tests of theoretical driver's licence tests.

¹¹ Obtained during commissioned research, degree projects or partnership projects.

<p>Administration</p>	<p>Notifications of side-line occupations Job applications Appointment decisions Terms of employment Work telephone numbers Reports to the Staff Disciplinary Board Agreements Register E-mail addresses Labour union claims Side-line occupations register Log of sent and received e-mail¹² So-called computer cookies Sent and received invoices Submitted travel expenses claims and flexitime reports Sent and received verifications Budget and accounting Payroll Payment authorisations Expert statements</p>	<p>Tenders¹³ Some agreements Medical certificates Staff information at HR advisors and occupational health services Rehabilitation matters Information that may jeopardise security of the premises and computer networks Employees' addresses and phone numbers, in certain cases Students' addresses and phone numbers, in certain cases</p>	<p>Internal messages sent via internal mail, fax, or e-mail, insofar as they do not form part of the final documentation in a matter Drafts and notes Drafts, idea referrals or concepts related to investigatory and decision-making processes Information pertaining to internal, unresolved matters</p>
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¹² Only pertains to the log of sent and received e-mail. The information in the e-mails themselves may be either public, secret or non-official, depending on its actual nature.

¹³ During the tender period.

Appendix 3

Examples of documents that must be registered

Agreements
 Decisions by vice-chancellor, dean, head, etc.
 Delegations
 Semi-annual decisions
 Semi-annual reports
 Doctoral thesis public defence/doctoral degree/applications
 Disciplinary matters
 Docentship applications
 Questionnaires
 Dismissals
 Ethical reviews
 Decisions on degree qualifications to be awarded
 Doctoral programmes – applications
 Research documents – applications and decisions on funding, agreements, contracts, reports to funders/financier, financial reports, correspondence with funders which is not clearly of little significance, etc.
 Students with disabilities –applications and decisions on aids
 Gift and donation letters
 Individual study plans
 Appointments – advertising, applications, reviews and appointment decisions
 Contracts
 Syllabi and course reading lists
 Licentiate degrees
 Unfavourable decisions in matters related to student administration
 Policy documents and local regulations
 Government directives
 Referrals
 Audit reports
 Information classed as secret, rehabilitation, reassignments
 Approvals
 Transfer of credits
 Programme study plans
 Advertisements
 Procurement
 Elections to boards and committees
 Annual activity plans/reports
 Notices of termination of employment
 Annual reports
 Matters/viewpoints/questions from students and others (that are not of little significance)
 Appeals