Records Management Policy

Adoption Date: 28 July 2008

Review Date: **06 February 2019**

Version:

6

Responsible Department: **Information Management**

TRIM Document Number: **D02467820**



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1. Objectives

Randwick City Council is committed to protecting the information contained in its records by maintaining a systematic approach to records management. The regulation of records management practices ensures that uniform protection is given to all records, both electronic and physical. Information is readily accessible owing to standard processes and identification procedures

2. Aim

The aim of this policy is to ensure that:

- there is a framework in which the records management program can function within Randwick City Council.
- all procedures and practices concerning records management are to be in accordance with this policy.
- Randwick City Council has the records it needs to support ongoing business activity and customer services, meeting accountability requirements and community expectations.
- Randwick City Council complies with all relevant legislation and other external requirements concerning its records and records management practices.

3. Applicability

This policy applies to all employees of Randwick City Council, including contractors and external consultants.

4. Policy Framework

4.1. Planning and Monitoring Council's Records Management Program

Regular planning is undertaken through the core components of the Records Management Program. The Information Management Strategic Plan and the Archives Plan are continually monitored and updated as required. The Information Management Coordinator undertakes regular monitoring of the program with results being reported to the Manager, Administrative Services and the Director, Corporate Services. The program will also be audited as part of the ongoing Internal Audit process. Council is also required to comply with nine key components of the *State Records Act 1998*. The Information Management Coordinator and the Archives Supervisor are to conduct a yearly review of Council's compliance against the nine key components of the *State Records Act 1998*.

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4.2. Information Governance Framework

This policy is also incorporated in Council's Information Governance Framework, which provides the basis for the creation, capture, management and use of full and accurate records, information and data in all formats used by Council.

4.3. Information Security Management System (ISMS)

Information Management practices shall incorporate all policies and procedures put in place by the ISMS. Information Management will incorporate any risk mitigation strategies as identified by Information Security Steering Committee (ISSC).

4.4. Value of Records as a Corporate Asset and Resource

Council's records are valuable and are a vital asset for its daily functions and operations. Records provide evidence of actions and decisions and are essential in relation to Council's accountability. They support policy formation and managerial decision making, protect the interests of Council and the rights of employees, clients and citizens. Records provide consistency, continuity, efficiency and productivity in program delivery, management and administration.

4.5. Electronic Document Management System (EDMS)

HPE Content Manager (HPCM) is Council's official EDMS for the management of its corporate information. TRIM was implemented at Council on 10 May 2004 and was then replaced with HP Records Manager (HPRM) on 22 June 2015. HPCM is Council's current version, which was introduced on 16 October 2017.

A phased management of electronic documents has been incorporated:

- 10 May 2004 All correspondence (incoming and outgoing) is managed electronically. Only correspondence related to Applications was managed in paper form;
- 17 October 2005 Commenced electronic management of all submissions (objections, support and comments) pertaining to Applications; and
- 1 July 2006 All Applications are managed electronically. This pertains to Application numbers including and greater than: DA/531/2006; CC/414/2006; CDC/89/2006; and Section 96s/Section 82As lodged on 1/7/06 or thereafter.

All corporate emails and faxes received or sent must be saved electronically in HPCM. This also applies to documents created in Word, Excel, PowerPoint and other applications, where they are saved electronically, in their native format.

Externally hosted social media content, such as postings on Facebook, Twitter etc. relevant to Council business processes is to be saved and actioned in HPCM accordingly. Additionally, any corporate information received via online forms generated from Council's internet site is also to be saved and actioned in HPCM.

Use of other non-compliant record systems is strictly prohibited and contravenes this policy. Disciplinary action will be taken against staff utilising non-compliant record systems.

4.6. Electronic Documents

Only the General Manager and the Director, Corporate Services can approve removal of documents from HPCM.

Access controls may be imposed by Information Management staff to HPCM record types and classifications. Other authorised staff may also impose access controls at the folder and document level (e.g. Tender and Recruitment Folders). Only specified staff are able to view documents with access controls. Audit logs will be kept in HPCM as evidence of staff document viewing.

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4.7. Folder Creation

Information Management is responsible for the overall management of new folder creations, both physical (where documents are pre 10th May 2004) and electronic. All physical folders are registered into HPCM and all electronic folders are created and maintained directly in HPCM.

The ability to create physical folders is restricted to Information Management. The ability to create electronic folders is restricted to:

- Information Management all types;
- Human Resources (HR) Personnel and Recruitment folders;
- Administrative Services Insurance Claim Folders: and
- Pathway created folders (automatically created in HPCM by various Pathway users).

Staff should always include a folder and document number as a reference when preparing correspondence and use templates in Council's corporate style to ensure that all necessary contextual information is recorded.

4.8. Tracking of Files

The movement of all physical folders will be tracked throughout Council to ensure that the current location and status of a folder can be quickly verified. Staff are to follow the procedures and guidelines relating to file movement and transfer outlined in the Information Management procedures manual (iManual) and Promapp. Folder locations are to be updated in HPCM.

5. Responsibilities

5.1. General Manager

Has overall responsibility for Randwick City Council's compliance with relevant legislation in relation to records management [State Records Act 1998 (part 2 Section 10)].

5.2. Director, Corporate Services

Is responsible for the management of Council's corporate information and has the authority to set and issue corporate standards in relation to all aspects of records management, and to monitor and audit compliance with those standards throughout Council.

5.3. Manager, Administrative Services

Is responsible for planning, developing and managing the records management function at Randwick City Council.

5.4. Coordinator, Information Management

Is responsible for:

- Administration of the Electronic Document Management System (EDMS);
- Determining and maintaining information management policy, procedures and standards throughout Randwick City Council;
- Actively promoting the concept and usage of HPCM;
- Developing strategies for Information Management in the storage and retrieval of records;
- Establishing and maintaining a central core of expertise to provide internal consulting services to Randwick City Council;
- Implementing Information Management policies and procedures;
- Developing training programs relating to the management of information in Randwick City Council;
- Carrying out records surveys, appraisals and the implementation of Disposal Authorities for records and other storage media;

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- Providing appropriate advice and assistance to Departments in connection with planning programming and undertaking disposal and survey work;
- Maintaining regular audits of HPCM; and
- Maintaining the integrity of the system with regards to maintenance and updates.

5.5. Senior Information Officer

Is responsible for:

- Providing efficient and effective day to day management of the section to ensure that procedures are implemented and maintained for all Information Management functions;
- Supervising and allocating of work to Information Officers, and to ensure accurate sorting and distribution
 of all incoming and outgoing correspondence;
- Assisting in the development and implementation of improvements to HPCM; and
- Assisting in Information Management training programs including on the job training.

5.6. Archives Supervisor

Is responsible for:

- Management of archives for both electronic and paper based records;
- Cataloguing and storage of all Council's holdings;
- Identification and destruction of all sentenced records (electronic and paper based);
- Retrieval and tracking of archives;
- Management of the migration of archival records from old systems to the EDMS;
- Assisting in the development and implementation of improvements to the EDMS; and
- Assisting in Information Management training programs including on the job training.

5.7. Information Officers

Are responsible for:

- Registering and actioning of correspondence received from external sources;
- Attending to inquiries (counter, phone & electronic) relating to file identification, movements and location;
- Creation of new folders according to established procedures;
- Opening, sorting and delivery of incoming mail within Council; and
- Preparing all outward official mail and parcels for dispatch.

5.8. Users

Individuals are responsible for:

- Ensuring that they are familiar with and utilise the available Information Management facilities;
- Adherence to procedures regarding Information Management;
- Registration of documents originated by them in HPCM, including received emails & faxes;
- Creating relationships between documents in HPCM;
- Providing adequate security for all records in their possession;
- Signing off electronic documents on completion of action;
- Using and attaching electronic notes to documents rather than annotating hard copies with ad hoc written comments;
- Identifying folder numbers for all documents they create;
- Taking file notes of all meetings and registering in HPCM;
- Taking file notes on all oral decisions and registering in HPCM;
- Making file notes on voice mail messages and registering in HPCM;
- Not moving any documents from one folder & placing on another (this is an Information Management function);
- Making records available to meet accountability requirements, such as provision to auditors, regulatory authorities and investigative bodies;
- All information must be accessible from HPCM. This is imperative for the accurate processing of Access to Information requests (GIPA);
- Correspondence emanating from Council resolutions is drafted by the appropriate knowledgeable officer who is best able to convey the Council's intentions in the matter; and
- Asking for training if unable to achieve these responsibilities.

All staff are required to comply with Council's ICARE Values as they pertain to recordkeeping responsibilities:

- Integrity Ensure 'Full & Accurate' records are maintained in HPCM.
- Customer Focus Council's constituents are to be informed on the progress of their enquiry.
- Accountability Completing or reassigning HPCM actions as required.
- **Respect** Assist fellow staff by use of the 'Notes' facility in HPCM to document the action taken and/or the action required (if reassigned).
- Excellence Become highly skilled in all aspects of the HPCM system.

5.9. Councillors

Are responsible for:

 Ensuring that full and accurate records of activities and decisions in the course of their official duties are created, registered, managed and disposed of appropriately to meet the Council's organisational needs and accountability requirements.

This responsibility is communicated to Councillors via the **Records Management Policy and Procedures for Councillors** document, adopted by Council in February 2007.

5.10. Contractors and Outsourced Functions

Records created by contractors performing work on behalf of Council should be made available to Council upon request and are covered under the State Records Act 1998. This includes the records of contract staff working on the premises as well as external service providers.

Section 121 of the Government Information (Public Access) Act 2009 requires private sector entities that enter into a contract with Council to provide an immediate right of access to the following information contained in records held by the contractor:

- a) information that relates directly to the performance of the services by the contractor;
- b) information collected by the contractor from members of the public to whom it provides, or offers to provide, the services; and
- c) information received by the contractor from Council to enable it to provide the services.

6. Disposal of Records

The disposal of records is governed by the State Records Act 1998 (NSW). Delegated Information Management staff are required to use the General Disposal Authority (GA39) for the retention and disposal of administrative records. No records should be destroyed unless approval is granted by the delegated staff within Council, and in accordance with one of the disposal authorities. Original documents that have been scanned and registered in HPCM are to be placed in dayboxes. Dayboxes can be destroyed after six (6) months in accordance with GA45.

7. Records Security

Council will adopt procedures to protect its records against unauthorised access and against loss and damage. Vital records are to be kept in a secure environment with access restrictions and adequate backup.

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8. Risk Assessment

Risk assessment involves an analysis of the consequences of records being lost, damaged or destroyed; evaluation of likelihood of threat and accident including natural disaster if appropriate, and evaluation of existing arrangements for the protection of vital records.

The Randwick City Council Business Continuity Plan covers the aspects of managing records in a crisis situation.

9. Legislation and Standards

The records management and records keeping practices of Council and its staff will comply with relevant Acts and Regulations of Parliament, standards and other mandatory requirements relating to records management.

These include:

State Records Act, 1998, NSW. (Amended 2005)

- State Records Compliance Audit 2008
- Records Management Health Check
- Vital Records Audit 2011-12
- 2013 Digital recordkeeping self-assessment questionnaire

Standard on Digital Recordkeeping

• Digital Recordkeeping Compliance 2009

State Records Regulation 2000

General Retention & Disposal Schedule GA39 (Local Government Records)

General Retention & Disposal Schedule GA45 (Imaged Records)

Australian Standard AS ISO 15489.1: 2017 Information and documentation - Records management,

Part 1: Concepts and principles

DIRKS (Designing & Implementing Record Keeping Systems) Manual

Local Government Act, Section 12, 1993

Government Information (Public Access) Act 2009

Privacy and Personal Information Protection Act, 1998

ISO 27001 Information technology -

Security techniques - Information Security Management Systems - Requirements

ISO 31000 Risk Management – Principles and Guidelines

Evidence Act (NSW), 1995

Privacy and Data Protection Bill, 1994

Public Finance and Audit Act, 1983 and Treasury Directions

Electronic Transaction Act. 2000

Other legislation containing record keeping requirements

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