



**GREATER SHEPPARTON CITY COUNCIL**  
**RECORDS AND**  
**INFORMATION**  
**MANAGEMENT POLICY**

Adopted: 18 February 2020  
Next Review: February 2022

## RECORDS AND INFORMATION MANAGEMENT POLICY

<b>Code:</b>	49.POL1
<b>Version:</b>	1.5
<b>Business Unit:</b>	Corporate Services
<b>Responsible Officer:</b>	Manager Corporate Governance
<b>Approved By:</b>	Chief Executive Officer
<b>Adopted By:</b>	Council 18 February 2020
<b>Next Review:</b>	February 2022

### DOCUMENT REVISIONS

Version #	Summary of Changes	Date Adopted
1.5	<p><b>Main difference from previous Policy</b></p> <ul style="list-style-type: none"> <li>• Removal of Responsibilities – now listed in IM Framework</li> <li>• Update to relevant legislation</li> </ul> <p><b>Main focus</b></p> <ul style="list-style-type: none"> <li>• Not system specific – applicable to all records &amp; information held by council regardless of format or system</li> <li>• Records &amp; information as a ‘Corporate Asset’</li> <li>• IM responsibilities sit with all staff</li> <li>• Working digitally where ever possible - &amp; continuing to work towards process improvements &amp; reducing paper</li> <li>• Inclusion of Records &amp; Information in Disaster Recovery &amp; Business Continuity planning</li> <li>• Transparent &amp; accountable processes &amp; procedures</li> <li>• Encourage increased collaboration &amp; content sharing within council departments</li> <li>• Security of information – regardless of system</li> </ul>	18 February 2020

## PURPOSE

*The purpose of this policy is to promote records and information as a corporate asset, to clarify staff responsibilities and ensure compliance with The Public Records Act 1973 (the Act) and Public Records Office Victoria (PROV) Standards. The Policy aims to establish consistency and reliability in the management of records and information across all business units of Greater Shepparton City Council (Council).*

*This Policy applies to all records regardless of format or system. A comprehensive, endorsed and fully supported records and information program enables evidentiary requirements to be met, supports consistent and informed decision making and promotes compliance with all legislative requirements*

*The Public Records Act 1973 (the Act) requires public sector organisations to make and keep full and accurate records of its activities. The Act also requires public agencies to ensure that such records are effectively and efficiently managed so that they are accurate, complete and available when required. These records must be protected from accidental or deliberate loss, damage or misuse and secured from unauthorised access. Council is responsible for, and is committed to, the effective management of all records and information in its care.*

## OBJECTIVE

*The objectives of the Information Management Policy are;*

- *To ensure that the management of Council's information resources and records management system provides timely and comprehensive access to information to meet the operational needs of council, accountability requirements and community expectations.*
- *To ensure the preservation of the Council's "corporate memory" through sound record keeping practices and the accurate capture of information to meet legal, evidential and accountability requirements.*
- *To continue to strive for the records of Council to be managed digitally, and for the creation and management of hard copy records to be minimalised.*
- *To clarify staff responsibilities and expectations and to ensure the management of records & information is entrenched in processes and procedures.*

## SCOPE

- *This policy applies to all Council staff and Councillors, whether permanent or temporary, including contractors and volunteers. Where services are outsourced, this policy is given effect through the inclusion of record keeping contractual clauses in the contracts of outsourced service provision.*
- *This policy applies to all business activities performed by or on behalf of Council, in whatever manner they are conducted.*
- *This Policy applies to all records, regardless of format, created during business transactions in all aspects of organisational business, and all business applications used to create and store records.*

*The policy will be fully integrated with information management policies, procedures and strategies, including those regarding Information Communication Technologies, Freedom of Information (FOI), Information Privacy, Information Security, Fraud & Corruption Prevention and Risk Management, and will be reviewed every two years. All of Council policies, practices, systems, and procedures pertaining to recordkeeping are to be consistent with this policy.*

*The Policy also covers all business applications used to create, manage and store information and records, including the official electronic document and records management system (EDRMS), email, websites, social media applications, databases and business information systems. This Policy covers information and records created and managed in-house and off-site.*

### **Recordkeeping Systems**

*Council is dedicated to the creation and maintenance of authentic, reliable and usable records for as long as they are required to effectively and efficiently support business functions and activities.*

*Council's primary EDRMS is TRIM (HPE RM). Council recognises that records may be maintained in other databases and software applications and paper-based systems which operate outside of the EDRMS, yet also function as record keeping systems. Council therefore requires the relevant Team Leaders, Managers and Directors to ensure these recordkeeping systems comply with legislative obligations and standards of practice.*

*All these other recordkeeping systems must be able to manage the following processes:*

- *The **creation** and/or **capture** of records within the recordkeeping system*
- *The **storage** of records.*
- *The **protection** of records **integrity** and **authenticity**.*
- *The **security** of records.*
- ***Access** to records.*
- *The **disposal** of records in accordance with approved disposal authorities*

*Whenever possible, these other recordkeeping systems shall interface with the EDRMS, or if appropriate, their functionality will be integrated into the EDRMS*

*All information created and/or received in the conduct of council business should be considered a public record and therefore captured into a recordkeeping system.*

*The following system/tools do not provide adequate recordkeeping functionality and are prohibited for use to store public records:*

- *Hard copy systems not controlled by council's EDRMS*
- *Email folders*
- *Local PC drives*

- *Portable storage devices, (USB's, external hard drives) and*
- *Shared (network) drives should only be used where functionality is unavailable or restricted in EDRMS.*
- *Software & databases that do not meet Standards set by the Public Record Office Victoria*

## **POLICY**

### **1. Policy Statement**

The purpose of this policy is to establish a framework and assign accountability across Council for ensuring a responsible and sustainable approach to the management and capture of records within Council. The records of Council are a strategic corporate asset and will be managed as such. Council is committed to implementing best recordkeeping practices and systems to ensure the creation, maintenance and protection of accurate and reliable records is in accordance with legislative and business requirements, including, but not limited to, the Public Records Act 1973, Privacy and Data Protection Act 2014 and Freedom of Information Act 1982.

The Public Records Act 1973 states that the 'Officer in Charge' (Chief Executive Officer) of a public office shall:

“cause to be made and kept, full and accurate records of the business of the office, and shall be responsible, with the advice and assistance of the Keeper of Public Records, for the carrying out within the office of a programme of records management in accordance with the standards established under the Act by the Keeper of Public Records and shall take all action necessary for the recovery of any public records unlawfully removed from the office.”

Council promotes a culture of open access to corporate information and documents. Increased collaboration and content sharing within Council will enable improved productivity, reduce costs and gain community confidence. All Council officers will have access to complete, accurate and current recorded information, available anywhere within the Council's network, as long as it is relevant to their business requirements.

Selected records will be assigned restricted access via a classification system. These would include records which contain sensitive or personal information. By improving the process of managing records, Council will reduce the risks associated with litigation and non-compliance with legislation such as the Public Records Act 1973 and the Evidence Act 2008.

Access exemptions are in place for information and documents that are considered to be of a personal or sensitive nature. Council will, in its management of such records, comply with all relevant provisions of legislation relating to the availability, protection and privacy of information. Council has

Privacy and Freedom of Information Officers to ensure that relevant legislation is adhered to.

Compliance with this policy demonstrates Council is committed to the transparent and accountable management of all corporate information assets.

This Information Management Policy is fully integrated with other information and knowledge management policies and strategies, including those regarding Freedom of Information, Privacy and Risk Management.

Council information and records is a corporate asset, vital both for ongoing operations and also in providing valuable evidence of business decisions, activities and transactions. Council is committed to creating, maintaining and protecting accurate and reliable records to meet its legal and community obligation.

Council will resource and implement fit-for-purpose information and records management practices and systems to ensure the creation, maintenance and protection of reliable records.

All information and records management practices at Council are to be in accordance with this Policy and its supporting procedures, Standards set by the Public Record Office Victoria, and all relevant legislative requirements.

## **2. Policy Principles and Application**

Council will apply the following fundamental principles in its approach to managing its information and records.

- Information and records are fundamental to Council's governance and provide accountability by demonstrating that due process has been followed.
- Principals apply to all systems that contain records.
- Information and records are a corporate asset to be managed and shared across the Council, except where the nature of the information requires restrictions.
- Timely and effective creation and capture of information and records is the responsibility of all employees, as listed in all position descriptions.
- The lifecycle of information and records will be managed in accordance with the requirements of the PROV, and will either be accountably destroyed or transferred in accordance with the Public Records Office Victoria Standards & Disposal Authorities.
- Information and records that are created digitally will be maintained and managed digitally.
- Hard copy records will be assessed for suitability for digitisation, and/or managed in hard copy in accordance with PROV requirements.
- Conversion of hard copy records to digital via scanning, must be done in accordance with Council's Adopted Post and Pre-Action Digitisation Plans.

- Council to have a vital records program, and information management to be included in the disaster recovery program and/or business continuity program
- Consideration must be given to GSCC's Information Management responsibilities when considering the procurement of any new software.
- All staff have recordkeeping responsibilities that will be monitored and assessed through QA of the system, and also as part of the Personal Development Review (PDR) process. Responsibilities are documented in all Position Descriptions.
- Recordkeeping & EDRMS training to be part of the core onboarding process of new staff, and available and encouraged for all existing staff.

### 3. Release of Publicly Available Information

In the spirit of open-government policies, access to publicly available information will be provided on Council's website. This is the responsibility of Chief Executive Officer.

A person may apply for access to documents held by Council under the *Freedom of Information Act 1982 (Vic)* ("FOI Act"). This applies to all documents held by the Council, whether in officially endorsed records management systems or in personal stores such as email folders or shared and personal drives. Responses to applications for access under the FOI Act are the responsibility of the authorised freedom of information officers.

### 4. Policy Breaches

The Crimes Act 1958 (Section 254 & 255) makes it a criminal offence in Victoria to destroy, conceal, render illegible, undecipherable or incapable of identification any documents which may be required in future legal proceedings; as a result, it is now possible that relevant officers or their organisation can be prosecuted for such breaches.

This includes, but is not limited to unlawful removal, sale, damage, destruction, deliberate release, inadvertent release, refusal to create, refusal to release, destruction of an index or similar that makes the record unavailable an item of corporate information.

**Council Staff and Councillors:** All Council staff and Councillors need to be aware of record keeping requirements that affect the performance and exercise of their duties and functions. The record keeping obligations on Council staff and Councillors include:

- Ensuring that full and accurate records are created and captured supporting actions and decisions made in the conduct of their position and in support of business activities;
- Maintaining security of records and information;
- Ensuring records are accessible

- Learning how and where records are kept within Council;
- Not destroying Council records without authority from Information Management;
- Protecting, and not losing records; and
- Being aware of records management procedures.

## RELATED POLICIES AND DIRECTIVES

### Policies

- *Fraud & Corruption Policy 15.POL1*
- *Freedom of Information Policy 37.POL11*
- *Privacy Policy 37.POL12*
- *Risk Management Policy 79.POL1*
- *Asset Management Policy 03.POL1*
- *Conflict of Interest Policy 37.POL6*
- *Procurement Policy 13.POL1*

### Guidelines

- *Records & Information Management Framework*
- *Digitisation Plan – Pre-Action Conversion*
- *Staff Exit Procedures*
- *Staff Entry Procedures*
- *Councillor Code of Conduct*
- *Greater Shepparton City Council Enterprise Agreement (or its successor)*

### Corporate Procedures

- *Use of Information, Communication & Technology Systems 52.PRO1*
- *Employees Code of Conduct 46.PRO12*
- *Social Media for Staff, Contractors & Volunteers Corporate Procedure 07.PRO4*
- *Information to be Made Available to the Public 37.PRO7*
- *Conduct of Council Business – Corporate Procedure 37.PRO5*

### Strategies

- *Business Continuity Plan (BCP) - v 3.0 - July 2019*
- *Records & information Management Strategic Plan – February 2020*

## RELATED LEGISLATION

- *Public Records Act 1973 (Vic)*
- *Freedom of Information Act 1982 (Vic)*
- *Privacy & Data Protection Act 2014*
- *Crimes Act 1958 (Section 254 & 255)*
- *Local Government Act 1989*
- *Electronic Transactions (Victoria) Act 2000*
- *Evidence Act 2008 (Vic)*
- *Health Records Act 2001 (Vic)*

- *Protected Disclosure Act 2012 (Vic)*
- *Civil Procedure Act 2010 (specially Sections 55A & 55C)*
- *Evidence (Miscellaneous Provisions) Act 1958 (Section 89A)*
- *Ombudsman Act 1973*
- *Civil Procedure Act 2010*
- *Electronic Transactions (Vic) Act 2000*

This policy complies with the following Standards and Codes:-

- *Australian Standard on Records Management AS ISO 15489*
- *Public Record Office Victoria Standards and Advice*
- *Victorian Public Service Code of Conduct*

### **MONITORING, REVIEW AND EVALUATION**

The Manager Corporate Governance is responsible for implementing, monitoring, evaluating the Records and Information Management Policy, and for its review every two years.



28/02/2020

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**Peter Harriott**  
**Chief Executive Officer**

**Date**