6.11.1 Records management principles

<table>
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<tr>
<th>Directorate</th>
<th>Business and Governance</th>
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<tr>
<td>Responsible Officer</td>
<td>Manager</td>
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Introduction

As a positive Corporate Governance practice, these principles guide the creation, capture and maintenance of records which provide appropriate and adequate evidence of the conduct of Council’s business and affairs.

This procedure applies to all Council business including electronic business. It concerns records that are created, collected, processed, used, sentenced, stored and disposed of in the conduct of official business.

Electronic messages (E-mail) which are relevant to the information gathering, policy or decision making processes of Council are part of the scope of procedure 5.09.1 Internet, Intranet and Email Acceptable Use.

Principles

This procedure is based on the principles that:

1. Responsibility for record keeping in a geographically dispersed organisation with decentralised decision-making must be taken at all levels of the BVSC.
2. Management and supervisory staff in all offices and depots must ensure their officers create, capture and maintain records that provide appropriate and adequate evidence of the conduct of the Council’s business and affairs.
3. Record keeping standards across all sites must be consistent.
4. Records must be adequate and appropriate for the purpose for which they are kept. This means routine administrative transactions can be documented with a minimum of identifiable information and records that provide appropriate and adequate evidence of the conduct of the Council’s business and affairs must comply fully with the State Records Act 1998.
5. Record keeping standards and procedures must be written in Plain English for use by all staff.
6. Appropriate record keeping systems must be established and maintained for records in different formats and compatible system hardware and software adopted throughout the BVSC.
7. Electronic records and paperless systems of storage and retrieval should be used in preference to hardcopy systems. Mechanisms must exist to monitor compliance.

Compliance requirements

Bega Valley Shire Council (BVSC) is committed to meeting its responsibilities under the State Records Act 1998.

Vital records

Vital records are those considered essential for the ongoing business of an agency, and without which the agency could not continue to function effectively. The identification and protection of such records is a primary object of records management and counter disaster planning.

The important legislation compliance requirements relevant to all records including identified vital records are:

1. Records must be made
   a. That are identified and documented.
   b. Records are to be created with immediacy and currency.
   c. All employees are aware of the responsibility to create and maintain appropriate records.
2. Records must be accurate
   a. Procedure and business rules direct how and when records should be made and captured ensuring they are an accurate true record.
3. Records are authentic
   a. The Executive Manager (whose role encompasses that of Council’s Public Officer) is informed about all records systems in the organisation.
   b. Records are routinely captured into recordkeeping systems.
c. Concise metadata (data about data) is created and captured or otherwise associated with the record.

4. Records must have integrity
   a. Unauthorised access and/or alteration, deletion or destruction of records is forbidden.
   b. Recordkeeping systems and storage facilities are designed and implemented to protect records from unauthorised alteration, deletion or loss.
   c. Records are uniquely identified.
   d. Migration of records from one system to another is controlled and documented.

5. Records must be useable
   a. Records are linked to the business context.
   b. Records relating to the same business activity or transaction are linked to each other.
   c. Location and use of records is recorded and tracked.
   d. Records are accessible for as long as they are required.

Records Management in practice

As required by s.12(2) of the State Records Act 1988, Bega Valley Shire Council (BVSC) maintains a records management program.

The objectives to be achieved through the program are that:

1. BVSC has the records it needs to support ongoing business activity and customer services, meeting accountability requirements and community expectations.
2. These records are managed as efficiently and effectively as possible.
3. These records are able to be retrieved and used to meet the above needs, and
4. BVSC complies with all external requirements concerning its records and records management practices.

The records management program is managed within the Business and Governance Directorate. The strategic plan for the program has been developed by the Community Strategic Plan (CSP) and its operational plan within the Strong Consultative Leadership outcome area. Performance indicators for the program have been developed and are reviewed. Regular monitoring of the records management program is undertaken with results being reported to the Leadership Executive Group (LEG).

Definitions

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<tr>
<th>Term</th>
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<tr>
<td>Content Manager 9</td>
<td>An electronic document and records management system for physical and electronic information designed to capture, manage, and secure information in order to meet governance and regulatory compliance obligations.</td>
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<tr>
<td>Authority</td>
<td>Computer application system providing business process services for local government.</td>
</tr>
<tr>
<td>Disposal authority</td>
<td>General retention and disposal authority: local government records (GA 39) – a tool which provides for the authorised destruction or other disposal of State records under the terms of the State Records Act.</td>
</tr>
<tr>
<td>General disposal authority 36 (GDA 36)</td>
<td>A tool which provides for the authorized disposal of records that have been copied using imaging or microfilming technologies.</td>
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Records management system

BVSC principal recordkeeping system is a hybrid of paper based and electronic record keeping systems.

The records management system integrates the management of paper and electronic records, using the electronic document management features of Content Manager 9 and Authority in conjunction with the existing paper based environment and Planning Development Application file system and the historical system of property files. Other electronic record keeping systems include the Weeds Management database. Historical paper based general files for BVSC can be located by subject matter via CM 9 and are located offsite.

The records team operates and maintains the system and provides services and training associated with the system. User guidelines and procedures are progressively being developed and are available on BVSC intranet.

A full range of services associated with the system in all offices and depots is provided throughout the Shire by the records team including management of hard copy files, Authority and CM 9. The Information Technology area of Business and Governance provide support for the E-mail system Outlook.

Services

The following services are available to staff in relation to the records management system:

1. Closure of files on which action is completed and of full parts (for paper based files)
2. Creation of new paper based files and parts (only for development applications)
3. File resubmits (for paper based files) through devolved access to Outlook Calendar
4. Electronic access, via the IT systems network, to electronic files and parts of files and electronic records contained in them.
5. Scanning and registration of hardcopy documents into an electronic format.
7. Access to register newly created documents.
8. Sending E-mails to external locations.
9. Mail services.
10. Training in the use of TRIM and Authority.

Disposal of records

BVSC uses the General Retention and Disposal Authority – Local Government Records (GA 39) to implement a program of regular sentencing and transfer.

Employees are to contact the records team for guidance on the disposal of drafts, working papers, copies, messages.

Electronic recordkeeping

In accordance with State Records Act 1998, BVSC policy is to capture and maintain electronic records in electronic form. BVSC is implementing the capture and management of electronic messages and documents as records, and integrating the management of paper and electronic records, using the CM-9 records management system.

BVSC operational and support programs are to ensure that adequate records meet known recordkeeping requirements and are created and kept of transactions carried out using those systems.
Business Rules

This section of the procedure outlines the Records Management Business Rules designed to ensure that Bega Valley Shire Council (BVSC) meets its obligations under the *State Records Act 1998* (the Act).

All BVSC employees must observe the following rules relating to the records management system:

1. Employees will use the Content Manager (CM-9) system to document all official business, unless using an authorised specific purpose recordkeeping system (such as Authority). Staff are not to maintain individual or separate files or recordkeeping systems or unmanaged electronic records or to use “Post It” notes for record keeping.
2. Business documents generated within BVSC including outwards correspondence should bear a unique CM-9 or Authority reference number.
3. Each record in CM-9 should have a unique identifier. Therefore there should be no duplication of records.
4. Only authorised employees may close files or parts or create new files or parts.
5. The location of every development application file should be accurate and up to date in CM-9 at all times. All employees are responsible for recording location changes when passing a file to another staff member, either by recording it in CM-9 or by notifying Records Management immediately.
6. Make effective use of the resubmit system.
7. Minimise the number of files kept at desks.
8. Files should not leave BVSC premises unless it is for the purposes of property inspections or movement between offices. If possible, a photocopy of relevant documents should be taken to meetings etc. outside BVSC premises.
9. Under no circumstances should staff take files home. If it is necessary to work on a file at home, a photocopy of relevant documents should only be used.

Accountabilities

This section of the procedure outlines the responsibilities of various positions within Council as they relate to records management.

**General Manager**

The General Manager has a duty under s.10 of the *State Records Act 1998* (the Act) to ensure Bega Valley Shire Council (BVSC) complies with the requirements of the Act and regulations for which the organisation is responsible. As records management is a business corporate governance issue, the General Manager has the responsibility to ensure the implementation of best practice.

**Executive Manager | People and Governance (P&G)**

The Executive Manager | People and Governance, as the Public Officer, is the senior manager responsible for the records management program and functions for the purposes of the Standard on Records Management Programs. The Executive Manager is accountable to the Leadership Executive Group (LEG) for the management of the program.

**Information Manager**

The Information Manager is accountable for ensuring BVSC compliance with external recordkeeping standards and for making and administering arrangements for the monitoring of the program by BVSC in that role, as required by s.12(3) of the Act.

**Records Management Team**

Relevant Records Management team members are accountable to the ICT Coordinator for the efficient daily operation of the records management system and the provision of services at agreed standards.
Directors/Executive Managers

The Leadership Executive Group (LEG) and their delegated line Managers are responsible for ensuring practices and systems in their respective areas of responsibility comply with this procedure and related principles and practice.

Operational employees

Employees are accountable to their supervisors for compliance with this policy and with related policies, standards and guidance. All staff has a responsibility to create records to document all BVSC business activities. This includes:

1. Decisions
2. Oral decisions and commitments, including telephone discussions
3. Meetings
4. Other events

Employees have a responsibility to capture records into official recordkeeping systems, except records that can be disposed of under normal administrative practice.

Disposal of paper copy relating to imaged records

This section of the procedure applies to hard copies of imaged records and outlines the correct way to dispose of these records. Original copies of documents for DA files, HR and Legal files are not covered by this procedure.

GDA 39 is the authority for the retention and disposal of administrative and functional records within Council. GDA 36 is the authority for the disposal of records that have been copied using imaging or microfilming technologies.

It allows for the destruction of records:

- Created at any time and that are not required as State Archives; or
- that are required as State Archives and were created or received on or after 1 January 2000; and
- The image copy is retained for the full retention period as required under GDA 39.

Additionally, the following conditions must be met before disposal is authorised under GDA 36:

- All requirements for retaining originals have been assessed and fulfilled;
- Copies are made which are authentic, complete and accessible and;
- Originals are kept for quality control purposes for an appropriate length of time.

There are records excluded from disposal in accordance with GDA 36 and these are as follows:

- Records that are subject to current or pending legal proceedings or relate to an application for access under Government Information (Public Access) Act 2009 (GIPA), the Health Records Act and the Information Privacy Act 2002 or the Privacy and Personal Information Protection Act 1998;
- Records that are subject to a Government Policy or directive not to be destroyed;
- Original artworks;
- Original proclamations, charters, testimonials and intergovernmental agreements or treaties.
Examples of State Archive records include (but are not limited to):

- Correspondence regarding building and development matters.
- A petition received from a community group.
- Declarations concerning a Councillor’s pecuniary interests.
- Speech notes made for addresses given at official Council events, and
- Complaints by rate payers about Council services.

### Definitions

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<tr>
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<tr>
<td>Disposal</td>
<td>A range of processes associated with implementing appraisal decisions. These include retention, deletion or destruction of records in or from recordkeeping systems. They may also include the migration or transmission of records between recordkeeping systems, and the transfer or custody of ownership of records.</td>
</tr>
<tr>
<td>Disposal Authority</td>
<td>General retention and disposal authority: local government records (GA 39) – a tool which provides for the authorised destruction or other disposal of State records under the terms of the State Records Act.</td>
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<td>A tool which provides for the authorized disposal of records that have been copied using imaging or microfilming technologies.</td>
</tr>
<tr>
<td>Image</td>
<td>A reproduction of a document on a media such as film, microfilm or optical disk.</td>
</tr>
<tr>
<td>Retention Periods</td>
<td>A disposal authority generally specifies retention periods. That is, how long State records are to be retained in a public office’s premises or offsite storage, before being destroyed or transferred as State Archives. Retention periods are usually minimum periods for which it is advisable/legally required to retain records. A public office may decide to keep records for longer periods.</td>
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<tr>
<td>State Archive</td>
<td>Defined in Section 3(1) of the State Records Act as:</td>
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<td>- “a state record that the authority has control of under the Act.”</td>
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<tr>
<td></td>
<td>- State Records is entitled to the control of “State Archives” which are records that are no longer in use for official purposes (25 years or older) and where these records are not the subject of a “still in use determination”. These are records older than 25 years but still required for business purposes.</td>
</tr>
<tr>
<td>State Records</td>
<td>Defined in Section 3(1) of the State Records Act 1998 as:</td>
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<td></td>
<td>- “any record made and kept, or received and kept, by any person in the course of the exercise of official functions in a public office, or for the use of a public office, where before or after the commencement of this section.”</td>
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### Responsibilities

Within Council the responsibility for the disposal of records procedure belongs to the Records Team and ICT Coordinator; the authority for the destruction of corporate records belongs to Information Manager.

Corporate records are not to be disposed of without reference to this procedure and consultation with the records team.

### Appraisal and disposal process

Sentencing is the process of identifying and classifying records, as part of the appraisal process, according to GDA 39 and applying the disposal action specified. A critical reason for sentencing is to allow the authorised
disposal of corporate records and by sentencing and proper documentation, Council is able to demonstrate it has disposed of its records legally and in accordance with the State Records Act 1998 (the Act).

Sentencing is carried out by the records team in consultation with appropriate staff.

Sentencing ensures resources are not utilised in storing records longer than necessary. GDA 36 allows the disposal of the paper document and the retention of the image in its place. In order to comply with GDA 36, the following procedures are in place:

1. Ensuring requirements for retaining originals have been assessed and fulfilled
   Council will complete this assessment prior to disposal.

2. Copies are made which are authentic, complete and accessible
   Council has in place routine copying and registration processes that ensure the legible reproduction of the original in its entirety are accessible, with the appropriate security in Council’s document management system. Records are scanned by a centralised team and compliance checking is part of the process. Once documents are registered into Council’s document management system there are controls in place to prevent unauthorised alteration of images. The system security prevents unauthorised destruction of images. Only authorised officers can delete images or records.

3. Originals are kept for quality control purposes for an appropriate period of time
   An assessment of each record will be undertaken at the point of registration to determine if the original document is excluded from disposal in accordance with GDA 36. If the original is not required, it will be stored in a day box for a period of at least 3 months before destruction.

4. Documenting the Imaging Process
   Attachment A details the imaging procedure. The paper copy will only be retained for 3 months unless the paper records are required as State Archives and have been created or received prior to January 2000.

Process description

The records team will scan incoming documents and register them in the electronic document management system. The original documents will then be sorted into the following categories:

- a. Original proclamations, charters, testimonials and intergovernmental agreements or treaties.
- b. Records that are subject to current or pending legal proceedings or relate to an application for access under GIPA, the Health Records Act and the Information Privacy Act 2002 or the Privacy and Personal Information Protection Act 1998;
- c. Documents kept hard copy (DA records, tenders, job applications, signed leases, agreements, bonds etc.)
- d. All other documents

Scanned documents will then be put into a day box. Day boxes will be destroyed after 3 months.

Process description

The records team will scan incoming documents and register them in the electronic document management system. The original documents will then be sorted into the following categories:

- a. Original proclamations, charters, testimonials and intergovernmental agreements or treaties.
- b. Records subject to current or pending legal proceedings or relate to an application for access under GIPA, the Health Records Act and the Information Privacy Act 2002 or the Privacy and Personal Information Protection Act 1998;
- c. Documents kept hard copy (DA records, tenders, job applications, signed leases, agreements, bonds etc.)
- d. All other documents

Scanned documents will then be put into a day box. Day boxes will be destroyed after 3 months.
Attachment A: Disposal of Paper Copy of Imaged Record

Record scanned, registered & sentenced under approved disposal authority

Is record an exemption under the GDA 36.2?

Yes

Retain original copy

No

Was the record created before 1/1/2008 and required for State Archive?

Yes

Has the quality assurance revision check been completed? (authentic, complete and accessible)

No

Complete quality assurance check of record

Yes

Electronic copy to be retained in TRIM in accordance with GDA 36.

Original to be kept for appropriate length of time for quality control purposes as per policy.

Permission to destroy