

ATTACHMENT TO AGENDA ITEM

Ordinary Meeting

18 February 2020

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GREATER SHEPPARTON CITY COUNCIL

Policy Number 49.POL1

Records & Information Management Policy

Version 1.5

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1.1	31/03/14	Revised following comments received from Bev Bell	Sharon Pearsons
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1.3	22/12/14	Revised – Information Services Manager	Sharon Pearsons
1.4	5/6/15	Revised – Acting Team Leader Information Management	Bev Bell
1.5	4/8/2015	Revised – Information Services Manager	Grant Barry
1.6	29/8/16	Revised – Manager – Corporate Performance	Sharlene Still
1.7	20/3/17	Revised – Team Leader Information Management	Bev Bell
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Information Management Policy

1. 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.

2. 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.

3. 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.

1.1. 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

4. POLICY

4.1 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.

4.2 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.

4.3 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.

4.4 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.

5. MONITORING, REVIEW AND EVALUATION

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

6. RELATED DOCUMENTS

6.1 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

6.2 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).

6.3 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

6.4 Strategies

- Business Continuity Plan (BCP) - v 3.0 - July 2019

6.5 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*

Peter Harriott
Chief Executive Officer

Date

Information Management Strategic Plan



**INFORMATION
MANAGEMENT STRATEGIC
PLAN
2019 - 2024**

Information Management Strategic Plan

PURPOSE

The purpose of this strategic plan is to set out the strategic direction of Greater Shepparton City Council's Information management program for the period of January 2019 to December 2024 to ensure business enablement and compliance.

This plan encompasses the strategic vision, mitigation of internal and external risks and timeframes of projects and identifies areas for innovation and business improvement in alignment with the Key Outputs identified in the Greater Shepparton City Council – Council Plan 2017 – 2021 and the Greater Shepparton 2030 Strategy, particularly those identified in the leadership and governance area.

The information management strategic vision and proposed projects are designed to complement the Council Plan and contribute to the mitigation of the risks identified therein.

INFORMATION MANAGEMENT STRATEGIC VISION

Council's records are a major component of its corporate memory and are vital assets that support business operations. Council records provide valuable evidence of the Council's corporate and auditing activities.

This strategic plan has been created to assist Greater Shepparton City Council's Information Management team to identify and achieve high level objectives in the short, medium and long term, but ultimately to achieve the defined vision within the next five years.

The Information Management Team Leader is responsible for the provision of access to; and the protection of Greater Shepparton City Council's corporate records. Information management at Council is a rapidly changing environment with the multiple regulatory and legislative changes as well as a recent shift toward the regulation of digital records created and managed by Victorian public offices.

The Information Management team is committed to the implementation of this Information Management Strategic Plan to ensure that it not only complies with the Public Records Act, but also the availability of those records for now and future generations of Council employees and the public.

Over the next five years we will focus on the following goals which are designed to support Council's Corporate Capabilities:

- ✳ Facilitating consistent, effective and compliant recordkeeping practices across Council by managing and providing an information management framework of policy, procedures, standards, codes of best practice and guidelines for information management.
- ✳ Improving the capability of Council's recordkeeping system deployed for the management of Council records to preserve the authenticity, reliability, integrity and usability of authoritative records.
- ✳ Facilitating an information management culture within Council that promotes efficiency and economy, both in the management of records and in Council activity, through sound recordkeeping practices.
- ✳ Improving the capability of Council staff by ensuring that all staff participate in a continual professional development program for records management.

Information Management Strategic Plan

<p>Our Mission:</p> <p>To provide guidance and support across Council through training and continuous improvement in information management, through the promotion of digital, flexible, and accountable recordkeeping practices that will enhance informed decision making and meet customer expectation.</p> <p>Our Vision:</p> <p>To be valued and approachable within the organization, and to promote records as an important asset which underpins all business processes. To continually strive for information management innovation.</p> <p>Our Values:</p> <p>The values embraced by the Information team that characterise Council as an organisation</p> <p>Our values are:</p> <ul style="list-style-type: none"> ✦ Respect first, always ✦ Take ownership ✦ Courageously lead ✦ Working together ✦ Continually innovate ✦ Start the celebration 	<p>Stakeholder Benefits:</p> <ul style="list-style-type: none"> ✦ Information flow being fast, accurate, accountable and traceable throughout the council ✦ Ease of access to information. Single source of truth ✦ Information management makes a direct contribution to Council objectives through seamless integration ✦ Able to make informed decisions with all the facts – Searchability ✦ Ability to search and retrieve information easily ✦ Improved efficiencies and accountability ✦ Security of information and version control ✦ Transfer of knowledge <p>Key Focus Areas:</p> <ul style="list-style-type: none"> ✦ Recordkeeping Operations ✦ Archive and Lifecycle Management ✦ Communication and Marketing ✦ Training and Development ✦ Interoperability and Standards ✦ Future Directions ✦ Legislative Compliance
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Information Management Strategic Plan

DIGITAL CONTINUITY 2020 TARGETS

The Information Management Strategic Plan is also influenced by the wider whole of government Digital Continuity 2020 Plan, which was released by the National Archives of Australia and the Department of Finance in November 2015.

Although this is a Federal government initiative, it is being used as the benchmark for State and Local Government around Australia. The Information Management strategic targets must align with the following Digital Continuity 2020 principles:

- **Principle 1 – Information is Valued**

- Focus on governance and people**

- Greater Shepparton City Council will manage their information as an asset, ensuring that it is created, and stored in an approved electronic document management system and managed for as long as it is required, considering business requirements and other needs and risks.

- **Principle 2 – Information is Managed Digitally**

- Focus on digital assets and processes**

- Greater Shepparton City Council will transition to entirely digital work processes, meaning business processes including authorisations and approvals are completed digitally, and that information is created and managed in digital format.

- **Principle 3 – Information, Systems & Processes are Interoperable**

- Focus on metadata and standards**

- Greater Shepparton City Council will have interoperable information, systems and processes to improve information quality and enable information to be found, managed, shared and re-used easily and efficiently.

Recordkeeping Strategic Outcomes

Expected outcomes driven by the Strategic Vision and enacted by the Information Strategic Projects are:

1. Decrease in physical records holdings and management resource requirements, Improved access to information and guides through greater utilisation of emergent communication technology
2. National Archives *Digital Continuity 2020* targets met by December 2020

Information Management Strategic Plan

STRATEGIC POSITION

A review of the current Information Management strengths, weaknesses, threats and opportunities was undertaken to assist in identifying possible strategies and to ensure skill gaps were minimised.

<p style="text-align: center;">STRENGTHS</p> <ul style="list-style-type: none"> • Qualified / Experienced IM Team - 50% of information management team have qualifications • Qualified Team Leader • Regular Monitoring of use of EDRMS • Diversity of Skill sets • Knowledge of council history – Stability • EDRMS & Recordkeeping Training available to all staff • Adopted Policy, Framework. Up to date Procedures and training guides • Dedicated team 	<p style="text-align: center;">WEAKNESSES</p> <ul style="list-style-type: none"> • Lack of buy-in and engagement with senior management and Executive • Limited integration with business systems, especially when IM not considered as part of normal work practices • Lack of accountability within teams for compliance with recordkeeping responsibilities • Lack of communication within IM team • Reluctance to extend comfort zones • Council staff do not understand importance or risk of not keeping records in the EDRMS
<p style="text-align: center;">OPPORTUNITIES</p> <ul style="list-style-type: none"> • Training all staff in recordkeeping responsibilities as well as EDRMS • Positions of influence to drive Information Management change • Multi skilling of IM team • Promotion of the benefits of good recordkeeping practices • Improve communication with users. • Build information management / system administration capacity • Make better use of software we already have 	<p style="text-align: center;">THREATS</p> <ul style="list-style-type: none"> • No dedicated IT TRIM Support / Lack of engagement and resources within ICT • Recordkeeping practices not taken seriously at departmental level. Full and accurate records not captured • Not using latest version of EDRMS. Current version no longer supported. • Not all records are in the recordkeeping system – increased compliance and privacy issues • Lack of understanding results in potential loss of data • Lack of accountability for recordkeeping compliance in annual performance review process. • Recordkeeping compliance not considered in purchase of new software. • Contractors should be trained & sign acknowledging Recordkeeping responsibilities before being given EDRMS access.

Information Management Strategic Plan

Key Focus Area	Key Success Factors	Key Performance Indicators
<p>Recordkeeping Operations</p> <p>Information Management team will create, capture and manage records in accordance with Council's policies.</p>	<ul style="list-style-type: none"> ✦ Reliable and appropriate IM infrastructure ✦ Review and update of standard naming conventions ✦ Develop data entry standard ✦ Consistency amongst Team with processing 	<ul style="list-style-type: none"> ✦ Timely and continued access to records to support Council in its day to day business activities ✦ Capture and indexed correctly – Documents are easily searchable and recoverable ✦ Standard Naming Conventions developed and implemented ✦ Data Entry Standard developed and implemented
<p>Archiving</p> <p>To manage the life-cycle of Council's records of continuing value in accordance with the Public Records retention and Disposal authority in local government. PROS07/01 and PROS09/05</p>	<ul style="list-style-type: none"> ✦ Adequate allocation of resources available to meet requirements of the disposal authority ✦ Records are preserved so that they may be used for the duration of their retention period. ✦ Locatable (that is, the records are identifiable, their location is known, and they are retrievable) ✦ Secure from unauthorised access 	<ul style="list-style-type: none"> ✦ Records are searchable & recoverable ✦ Disposal is systematic

Information Management Strategic Plan

Key Focus Area	Key Success Factors	Key Performance Indicators
<p>Communications and Marketing</p> <p>To promote and support a culture of proper recordkeeping practices throughout Council.</p>	<ul style="list-style-type: none"> ✦ Recordkeeping tips and guides are issued and reviewed on a regular basis ✦ Develop a Communication Plan ✦ Ensure that council is aware of its recordkeeping obligations. ✦ The Strategic plan to be communicated to all levels of staff throughout council 	<ul style="list-style-type: none"> ✦ Staff are aware of their recordkeeping responsibilities. ✦ Communication Plan developed and implemented ✦ Quantity of documents being registered and a decrease in errors in identification through reporting.
<p>Training and Development</p> <p>To ensure that Information Management staff maintain their competencies and continue their professional development.</p> <p>To provide training and resources to ensure all Councils employees understand their Recordkeeping responsibilities and systems.</p>	<ul style="list-style-type: none"> ✦ Information Management staff participate in some form of professional development at least annually. ✦ Training programs implemented for all personnel who create records or use the recordkeeping system ✦ All Council Staff to participate in recordkeeping / EDRMS training every 2 years 	<ul style="list-style-type: none"> ✦ Skilled professional information management team who have achieved recordkeeping qualification. ✦ Awareness by Council's employees of EDRMS and their responsibilities and their willingness to use the system. ✦ All Contractors & Agency Staff complete recordkeeping & EDRMS training prior to receiving system access. Also consideration be given to requiring sign off to confirm understanding of responsibilities.

Information Management Strategic Plan

Key Focus Area	Key Success Factors	Key Performance Indicators
<p>Interoperability and Standards</p> <p>To ensure that the Record Management system seamlessly integrates with all Council business systems in a timely manner.</p> <p>To ensure compliance with relevant recordkeeping standards to minimise Council’s risks.</p>	<ul style="list-style-type: none"> ✦ Information Management Strategic Plan endorsed ✦ Develop a Council Wide Disaster Preparedness Plan (including vital records) ✦ Review of Business Classification scheme to ensure a standard naming convention across council and to minimise the use of separate registers 	<ul style="list-style-type: none"> ✦ Plans directly flowing from Councils Corporate plan. Update the plan every year ✦ Vital Records and Disaster Recovery Plans developed for identified records ✦ Business Classification scheme review completed

Information Management Strategic Plan

Key Focus Area	Key Success Factors	Key Performance Indicators
<p>Future Directions</p> <p>Investing in Information Management practice that support continuous improvement</p>	<ul style="list-style-type: none"> ✦ Continue to strive for Digital Work Processes across the organisation & for the Removal of Paper Reliance ✦ A business continuity plan will be developed to minimise risk of loss or damage to records in the event of a disaster ✦ Draft process maps for information architecture ✦ A review of the use of digital signatures undertaken ✦ Increased use of technology to improve and streamline record capture accuracy (eg. EzeScan) 	<ul style="list-style-type: none"> ✦ Council performs all tasks digitally wherever possible ✦ Business Continuity Plan to be completed and updated every year in line with changes to the business ✦ Process maps for information architecture drafted ✦ Health check of EDRMS undertaken and recommendation report drafted.