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## 1.9 Recordkeeping

<b>Policy Owner</b>	<b>Administration</b>	
<b>Person Responsible</b>	<b>Deputy Chief Executive Officer</b>	
<b>Date of Adoption</b>	<b>23 February 2022</b>	
<b>Date of Last Review</b>	<b>28 February 2024 – Resolution 090224</b>	
<b>Date Next Due for Review</b>	<b>3 years / or earlier if required</b>	<b>3 years</b>

### OBJECTIVE

Good documents and records support effective business practice and improves organisational accountability and efficiency. As such, documents and records are a vital organisational asset and a cornerstone of the Shire of Wongan Ballidu's (the Shire) governance.

The Shire has a legislative obligation, under the *State Records Act 2000* (the Act) to create, capture, retain and manage documents and records that support the Shire's business functions, corporate decisions and activities.

This policy sets out the requirements, roles, and responsibilities to ensure:

- The electronic documents and records management system (EDRMS) is the mandated records system.
- Official documents and records are captured into the EDRMS or [line-of-business systems](#).
- Access and dissemination are appropriate.
- Information integrity is maintained.
- Vital documents and records are identified and managed in accordance with relevant legislation to ensure business continuity.
- Unauthorised tampering or destruction of documents and records is an offence under the Act and severe penalties may be applied for a breach of the Act.

This policy will support the Shire in meeting its strategic plan directions and priorities and adapt to changing business environments and promote efficiencies.

The policy reflects the legislated document and records management requirements under the *State*

Records Act [2000](#), Local Government Act 1995, and Freedom of Information Act 1992.

## SCOPE

The Shire will ensure that corporate documents and records are created, captured, retained, and managed in accordance with legislative and operational requirements; and are authentic, reliable, useable, and capable of supporting business functions and activities for as long as they are required.

This policy applies to the official corporate documents and records of the Shire.

This policy applies to all corporate information, records, and data regardless of media and format (including but not limited to hard copy documents, electronic documents or file, email, handwritten notes, digital data, and multimedia) received or created in the conduct of Shire business.

This policy applies to all business applications used to create, manage, and store information (records management systems, databases, line-of-business systems, email, websites, social media, and messaging applications) managed in-house and offsite.

## ROLES AND RESPONSIBILITIES

All Shire employees, elected members, contractors, consultants, and providers of outsourced services are responsible and accountable for creating, capturing, and managing Shire documents and records related to their work activities in accordance with this policy and supporting procedures.

The extent of those responsibilities will vary according to individual roles.

Role	Responsibilities
Chief Executive Officer	Ensure the effective implementation of this policy directive within the offices of the Shire.
Managers (Includes Deputy Chief Executive Officer)	Implement this policy directive in their areas of responsibility.  Ensure that official documents and records will only be altered, deleted, archived, stored, and destroyed in a manner compliant with this policy, the Act and best practice principles.  Ensure employees within their area of responsibility comply with digitisation requirements in accordance with this policy and its supporting procedures.  Routinely monitor business rules, procedures, and devices to ensure the integrity of digitised electronic record versions and compliance

Role	Responsibilities
	with this policy; and taking corrective action accordingly.
Deputy Chief Executive Officer	<p>Manage the policy (including feedback, review, document and records management requirements, update policy versions and removal of revoked policy).</p> <p>Provide policy direction and assistance, including interpreting policy requirements.</p> <p>Manage the design, configuration, implementation, and maintenance of the EDRMS.</p> <p>Ensure that archiving, storage, and destruction of records complies with this Policy, the Act and best practice principles. Responsible for ensuring document and records management roles, responsibilities and capabilities are incorporated into role descriptions, performance agreements, legal agreements, and employment and outsourcing contracts.</p> <p>Assign resources to develop, implement, communicate, train, monitor and oversee digitisation business rules or procedures.</p>
Employees, elected members, contactors, consultants, and providers of outsourced services	Comply with this policy when performing their duties.

## POLICY

### CREATION

Documents and records are created as part of day-to-day business activities of the Shire. The purpose of the record is to document evidence of business transactions, to comply with legal requirements, to record decisions made and actions taken and to maintain a record of communications sent or received.

Documents and records need to be complete, suitable, and meaningful to the purpose for which they are created and kept.

Content to be published on the Shire of Wongan Ballidu website and Facebook page will be created

and approved (where required by the Chief Executive Officer) in a document external to the platform before publication.

## **CAPTURE**

Every document or record relating to Shire business activities and transactions that is received, created, or held in any form (voice recordings, physical or electronic) will be registered into the EDRMS unless an exemption is in place. Exemptions may be sort from the Deputy Chief Executive Officer.

All documents and records must be accessible and unencrypted (i.e., not password or copy protected or converted into a code that would prevent access), as soon as practicable after the event. This includes business emails, attachments, calendar/diary appointments, tasks and notes relating to Shire business activity which are received, created, sent, or held in an email messaging system.

The Shire's website and Facebook content, including the approval to post (where required by the Chief Executive Officer), must be captured to the EDRMS before it is uploaded. In addition, all documents published on the Shire's Facebook page or website must be copied, and the original documents must be saved to the Shire's EDRMS.

## **VALIDATION**

Shire documents and records created, received, or held will be capable of being validated as accurate, complete, and reliable. An audit trail will be maintained to track and verify all changes to, and activities performed on Shire documents and records.

## **OWNERSHIP AND INTELLECTUAL PROPERTY**

Documents and records created or received by employees, elected members, contractors, consultants, and providers of outsourced services during the conduct of Shire business activities will be managed as information assets owned by the Shire (except where otherwise agreed in contracts or copyright agreements).

## **CLASSIFICATION AND NAMING CONVENTIONS**

The Shire has adopted a pragmatic approach to naming records. The information architecture imposed in the EDRMS solution supports efficient and effective records use supporting quick, easy retrieval of information assets to support accurate, timely reporting.

## **METADATA**

Documents and records created, received, or held in the Shire's EDRMS will contain appropriate recordkeeping metadata describing their context, content, and structure in accordance with the State Records Commission Standard 8. This metadata will facilitate and control the creation, capture,

identification, classification, access, security, storage, preservation, retention and disposal of documents and records.

### **ACCESS CONTROLS AND SECURITY**

Shire access controls and security are applied to documents and records at the time of creation, receipt and capture. This is to ensure that they - and any related confidential, private, sensitive, or intellectual property information - are protected from inappropriate access, usage, disclosure, or alteration. Multifactor authentication on all environments is in place to prevent unauthorised access.

The controls and protocols applied will also need to comply with legally enforceable rights of access to information embodied in the *Freedom of Information Act 1992* to support openness and accountability.

Public access rights determinations will also be made when archival documents and records are transferred to State Records of WA or approved records storage providers for storage or permanent archiving in accordance with the State Records Commission Standard 7.

### **STORAGE, LOCATION, AND SPACE MANAGEMENT**

Documents and records will be stored in an unencrypted, open and enduring format in the EDRMS, on appropriate media or in managed storage locations that ensure their preservation, security, accessibility, and integrity over time.

This policy outlines seven principles to be considered when storing physical records in a facility under the direct control of the Shire or by a third-party:

- Location: sites, facilities and areas for records storage should be located away from known hazards and be convenient to user needs.
- Environmental control: records should be stored in environmental conditions that are appropriate to their format and retention period.
- Shelving and packaging: the shelving, equipment and containers for records storage should ensure that records are secure, accessible, and protected from deterioration.
- Maintenance and security: records storage facilities, areas and records should be maintained to safeguard their security, condition, and accessibility.
- Protection from disaster: disaster management programs should be established and maintained to ensure that risks to records are minimised and managed appropriately.
- Careful handling: the retrieval and use of records in storage areas should be subject to controls that prevent damage and deterioration.
- Accessibility: records should be stored and controlled in facilities where they can be identified, located, and retrieved easily.

## **RETENTION, DISPOSAL, AND DESTRUCTION**

Documents and records will be systematically retained, stored, and archived for at least the minimum length of time stipulated by the relevant current records disposal authority approved by the State Records Office of Western Australia.

Documents and records will only be altered, destroyed, or deleted in accordance with the provisions of the Act. Sentencing of records must be actioned by a trained records officer and disposal of records must be authorised by Executive management before disposal takes place.

Records subject to a Freedom of Information request, legal action or State Records disposal freeze must not be destroyed even if the minimum retention period has been reached.

## **DIGITISATION**

Physical documents converted to digitised electronic record versions will be:

- digitised via a multi-function device or document scanner connected to the Shire network which meets Shire minimum digitisation specification requirements; and
- managed and disposed of in accordance with the State Records Office Guideline Records Retention and Disposal Instructions and General Disposal Authority for Source Records (RD 2016002).
- Digitised electronic record versions of source physical documents will be captured, managed, archived, and disposed of within the EDRMS as electronic records in accordance with this policy, and the minimum length of time stipulated by the relevant current disposal authority approved by the State Records Office.

## **SEARCH AND RETRIEVAL**

Documents and records will be created, captured, named, classified, appropriately secured, version controlled and managed in the EDRMS to enable them to be quickly and easily searched and retrieved, via EDRMS search and retrieval tools, to improve business processes and service delivery unless an exemption is approved.

This includes tracking the movement, transfer and current location of all documents and records in the EDRMS, including those stored offsite, at State Records of WA and at approved temporary records storage providers.

## **VITAL RECORDS AND RECORDS DISASTER MANAGEMENT PLAN**

Vital documents and records created, received, or held will be identified, managed, and protected

by the development and implementation of a vital records plan.

Business continuity plans for electronic and physical documents and records will also be developed, regularly tested, and implemented in the event of a disaster to minimise the loss of Shire information assets and ensure business continuity.

### **DESIGN OF BUSINESS INFORMATION SYSTEMS.**

Document and records management requirements and controls documented in this policy and State Records Commission Standards will be considered and built into the specifications, design, development, modification, upgrade, documentation, and implementation of all new or modified business systems and information and communication technology (ICT) processes relating to documents, records, and information assets.

Document and records management processes related to the design of business systems and ICT processes will include the analysis of business activities, assessments of existing systems and business processes, identification of recordkeeping and metadata standard requirements and controls, migration strategies, and requirements for integration with the EDRMS.

All new line of business systems will consider the State Records Commission Standards and Guidelines, and the Act.

### **CONTRACTING AND RECORDS MANAGEMENT REQUIREMENTS.**

Where contractors or external service providers are engaged by the Shire, the Shire's Records Management Policy requirements, roles and responsibilities will be addressed in the contract or agreement provided to engage the service.

### **INDUCTION AND TRAINING.**

All new employees and elected members are required to complete records management training. Records handling training will be completed by all users as appropriate to their role and responsibilities. A record of training completed must be retained.

Shire managers are required to provide access to records management training to employees, contractors, consultants, and elected members appropriate to their role in document and records management responsibilities.

## **DEFINITIONS**

In the context of this document:

A document or record means:

- written, graphic or pictorial matter; or a disk, tape, film, or other object that contains information or from which information may be reproduced (with or without the aid of another object or device).
- information in any format, both analogue and digital (including paper, micro-form, audio-visual, graphic and electronic media).
- Documents are created by planning what needs to be done.
- Records are created when something is done.
- An official document or record means: a document or record made or received by the Shire in the conduct of its business, including drafts of final versions or materials with a continuing reference value.
- Documents and records that are not considered to be official include documents or records received that were intended for another recipient agency or individual.
- Vital documents and records mean documents or records in any format that contain information essential to the survival of an organisation.

## **RELATED DOCUMENTS**

### **State Records Office**

State Records Policies, Guidelines and Disposal Authorities:

- Australian Standard on Records Management AS ISO 15489-2002
- Born Digital: Managing Government Information and Data
- Directions for Keeping State Archives Awaiting Transfer
- General Retention and Disposal Authority for Local Government Information 2023-005.
- General Disposal Authority for Source Records (RD 2016002).
- Guidance for Identifying and Retaining Records which may become relevant to an Actual or Alleged Case of Child Sexual Abuse
- State Records Commission Policy – Local Government Elected Members records.

- State Records Commission directive 29 August 2019 Records relevant to Royal Commissions
- State Records Commission Standards 1 to 8 inclusive.

### **Legislation**

Including but not limited to:

- Criminal Code 1913
- Electronic Transactions Act 2003
- Evidence Act 1906
- Freedom of Information Act 1992
- Local Government Act 1995
- State Records Act 2000
- Privacy Act 1988 (Fed.)

### **Other Publications**

- Western Australian Auditor General Records Management in Local Government Report
- Australian Standard, AS 4390 – 1996, Records Management

### **REVIEW**

Reviews of this policy are to be undertaken every three years or earlier if required.

### **RESPONSIBILITY FOR IMPLEMENTATION**

The Deputy Chief Executive Officer is responsible for implementing this policy.