



WHYALLA CITY COUNCIL

**WHYALLA**

| <b>Records Management Policy</b> |                                                                                                                                                                                                                                                                                                                                                                                                  |
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| Type                             | Information Management                                                                                                                                                                                                                                                                                                                                                                           |
| GDS Category                     | Records & Information Management - Internal                                                                                                                                                                                                                                                                                                                                                      |
| Responsible Officer              | Information & Records Management Coordinator                                                                                                                                                                                                                                                                                                                                                     |
| Policy Adopted                   | 27 June 2022                                                                                                                                                                                                                                                                                                                                                                                     |
| Review Period                    | 4 Years                                                                                                                                                                                                                                                                                                                                                                                          |
| Last Reviewed                    | July 2026                                                                                                                                                                                                                                                                                                                                                                                        |
| Next Review Date                 | July 2030                                                                                                                                                                                                                                                                                                                                                                                        |
| Policy Version Number            | 2                                                                                                                                                                                                                                                                                                                                                                                                |
| Applicable Legislation           | <ul style="list-style-type: none"><li>• State Records Act 1997</li><li>• Local Government Act 1999</li><li>• Freedom of Information Act 1991</li></ul>                                                                                                                                                                                                                                           |
| Related Documents                | <ul style="list-style-type: none"><li>• Information &amp; Records Management Framework</li><li>• Information &amp; Records Management Strategy</li><li>• Source Records Management Procedure</li></ul>                                                                                                                                                                                           |
| Public Consultation Required     | No                                                                                                                                                                                                                                                                                                                                                                                               |
| Purpose                          | The purpose of this Policy is to establish a foundation for the implementation and maintenance of an appropriate information and records management system. The Council operates in an accountable and community orientated environment and is committed to maintaining an information and records management system that meets business needs as well as legal and accountability requirements. |

## **1. Introduction**

The State Records Act 1997 governs the obligations and responsibilities of Councils in relation to the management of official records. Under this Act each Council has an obligation to maintain official records in its custody in good order and condition. The obligation applies not only to the capture, storage, maintenance and disposal of physical records but also to records in electronic format.

An official record is defined in Section 3 of the State Records Act 1997 as a record made or received by the Council in the conduct of its business. As Whyalla Council Employees and Elected Members act as representatives of the Council any record created, sent, received, forwarded or transmitted in the performance and discharge of their functions and duties may be classified as an official record. However, records that are merely transitory, temporary, personal or private in nature will fall outside the definition of “official records”.

## **2. Policy Objective**

To ensure that the management of Council’s information and records management system provides timely and comprehensive knowledge information to meet operational business needs, 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.

## **3. Scope and Responsibilities**

This Policy applies to all Council business, including electronic business. It involves records, which are created, collected, processed, used, sentenced, stored and disposed of in the conduct of official business. It applies to all Council Employees and Elected Members.

Electronic communications relevant to the information gathering, policy formulation or decision-making processes of Council fall within the scope of this policy. All procedures and records management systems are to be consistent with this Policy.

Council Employees and Elected Members must not intentionally damage, alter, dispose of or remove official records of the Council without authorisation to do so. Council employees and Elected Members are required to handle Council records with care and respect in a sensible manner to avoid damaging records with a view to prolonging their life span.

Council employees and Elected Members must ensure that Council records in any format (including electronic documents and electronic messages which they personally receive or send), are to be captured into the Council’s electronic document and records management systems. Records must be readily accessible to meet business and accountability requirements. Staff members of the Records Team are required to follow authorized procedures in carrying out records management functions.

Electronic records are to be captured and maintained as functioning records by preserving their structure, context and content. In order to maintain their value as evidence, electronic records must be unaltered. That is, they cannot be altered or manipulated for as long as they are retained.

Council Employees or Elected Members who do not comply with this policy may be subject to disciplinary action under the relevant Code of Conduct, and/or subject to criminal or civil proceedings. Council employees should report breaches of this policy to the Information & Records Manager Coordinator. Elected Members should report breaches to the Chief Executive Officer.

#### **4. Policy Statement**

The establishment of an effective and efficient record keeping environment ensures standardisation, protection and retrieval of information improving levels of quality customer service.

Good records management is of key importance to good governance. Records are vital to support the Council's ongoing business activities. The Council is committed to managing its records of continuing value and their timely transfer to the State Records Office in accordance with the Act and best practice standards.

In addition to information and records management obligations under the Act, the Council is obliged to keep adequate records in order to fulfill its responsibilities under other Acts such as the Freedom of Information Act 1991, as well as fulfilling legal processes, such as discovery and subpoenas. Records may also be required by Royal Commissions, the Ombudsman, the Courts, auditors and other people or bodies.

This policy provides the procedural foundation for the Council to effectively fulfil its information and records management obligations and to meet the statutory requirements upon it.

#### **5. Confidential Records**

If a Council employee or Elected Member believes that a record is of a highly sensitive or confidential nature, he or she should advise their General Manager or Chief Executive Officer of that view. It will be at the discretion of the General Manager or Chief Executive Officer, whether such information will then be treated as confidential and access to those records restricted.

#### **6. Records Security/Access**

The security of all Council records is crucial as records provide evidence of business transactions, support management decisions and ensure public accountability requirements are met. Records in all formats should be stored securely to prevent unauthorised access, destruction, alteration or removal.

Council Employees are responsible for the safe custody of all files and documents that are allocated to them. Sensitive or confidential information must be placed in a secure storage area when not in use.

File storage units should be locked overnight wherever possible to prevent unauthorised access. Amongst other risk management considerations, this reduces the possibility of damage by water or fire in the event of a disaster.

Council Records are not to be stored at home or left in cars unattended as they could be lost damaged or stolen. Vital Records should be stored in protective or fire-resistant conditions with suitable access conditions. Confidential Records must be stored in a secured environment whether they are in hard copy or electronic form and accessible only by authorised persons.

## **7. Responsibilities and Accountabilities**

### **7.1 Chief Executive Officer**

The role of the Chief Executive Officer of the Council, as prescribed by Section 99(h) of the Local Government Act 1991, includes ensuring that records required under any legislation are properly kept and maintained.

### **7.2 Information & Records Management Coordinator**

Responsibility for Council's information and records management system is assigned to the Information & Records Management Coordinator, under supervision of the Manager of Finance & Knowledge Management.

The role of the Information & Records Management Coordinator is to provide a strategic focus for record keeping throughout the Council and is responsible for:

- ensuring that official records are managed in accordance with the State Records Act;
- establishing information and records management policies and procedures for the Council as a whole;
- establishing corporate standards for record keeping and records management;
- measuring performance of Council business units against these standards;
- providing consulting services to Council Employees and Elected Members;
- developing corporate electronic record management strategies;
- working with other knowledge and information management specialists to develop coherent knowledge and information architecture across Council;
- working with accountability stakeholders, including FOI officers and Executive Management staff, to ensure record keeping systems support organisation and public accountability; and
- providing Council Employee and Elected Members with appropriate training and tools to allow them to meet their record management responsibilities.

### 7.3 Council Employees

All Council Employees need to be aware of record keeping requirements that effects the performance and exercise of their duties and functions. The record keeping obligations of Council Employee include:

- learning how and where records are kept within Council;
- making records to support the conduct of their business activities;
- creating records that would not otherwise be created;
- not destroying Council records without authority from the relevant delegated Officer;
- not losing records; and
- being aware of records management procedures.

### 7.4 Elected Members

All Elected Members need to be aware of record keeping requirements. The record keeping obligations of Council Members include:

- making records to support the conduct of their business activities;
- forwarding records to the Records Management Officers for capture into records management system;
- not destroying Council records;
- not losing records; and
- being aware of records management requirements.

### 7.5 Records Management Officers

Records Management Officers are operationally responsible for the efficient management of Council records (physical and electronic) incorporating sound record keeping principles and records management best practice guidelines.

These officers are responsible for the effective management and system administration of the Council's primary record keeping system Synergysoft.

The officers will assist Council Employees and Elected Members in fulfilling their record keeping responsibilities and provide advice and training throughout the implementation of this policy, procedure and strategies.

## 8. Destruction

Official Records must only be disposed of in accordance with the General Disposal Schedules for Local Government Authorities in South Australia. A copy of the schedules can be accessed through the State Records website at [www.archives.sa.gov.au](http://www.archives.sa.gov.au) Transitory or Temporary Records, or Records that are personal or private in nature, may be destroyed in accordance with Normal Administrative Practice.

Only Records that have been identified as non-official and of no continuing value to the Council can be destroyed by individual Council Employees and Elected Members. Council Employees and Elected Members should contact the Records Management staff for assistance with the destruction of such Records.

The CEO (or delegate) is the only person with the authority to Dispose of Official Records and approve destruction of Records at the City of Whyalla City Council.

## 9. Definitions

For the purposes of this policy the following definitions apply:

### **CEO**

Refers to the Chief Executive Officer (including their delegate) of the City of Whyalla.

### **Continuing Value**

Records of continuing value are those that contain information that is of administrative, legal, fiscal, evidential or historical value to Council.

### **Council Employees**

Includes persons employed by the Council, volunteers, trainees, work experience placements, independent consultants and contractors and other authorized personnel offered access to the Council's resources.

### **Dispose Of**

To dispose of an Official Record means to:

- a) Destroy or abandon the record
- b) Carry out an act or process as a result of which it is no longer possible or reasonably practicable to reproduce the whole or a part of the information contained in the record.
- c) Transfer or deliver ownership or possession of or sell the record, or purport to do so but does not include to transfer or deliver the record to the State Records Office or between Council and another agency.

### **Elected Members**

Includes all Councilors and the Mayor.

### **EDRMS**

Electronic Documents and Records Management System (record keeping system)

### **FOI**

Freedom of Information

### **GDS21**

General Disposal Schedule No. 21 for the disposal of hardcopy source records after digitization.

## **GDS40**

General Disposal Schedule No 40 applies to all records, irrespective of format or media, created or received by any Local Government Authority in South Australia.

### **Normal Administrative Practice**

Or NAP, provides for the routine destruction of drafts, duplicates and publications, with the test that it is obvious that no information of more than transitory or temporary value to Council will be destroyed. Material that can be disposed of under Normal Administrative Practice comprises items of a temporary or transitory nature created, acquired or collected by Council Employees or Elected Members in the course of their official duties. Such material has no ongoing value and is not usually incorporated into Council's EDRMS (such as reference material).

## **6. Authority**

*Authorised by Council 20 July 2026.*