

# Information Management Policy

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## Purpose

The purpose of this policy is to establish a consistent and accountable approach to managing information across the Council. It ensures that information is created, captured, stored, accessed and disposed in accordance with legislative requirements, best practice standards and organisational needs.

This policy supports informed decision making, transparency and the protection of Council official records as valuable assets.

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## Policy Statement

### 1. Introduction

- 1.1 This Information Management Policy outlines the City of Burnside's commitment to the *State Records Act 1997* as the principal legislation in South Australia governing the obligations and responsibilities of Councils concerning managing their records.
- 1.2 Under the *State Records Act 1997*, the City of Burnside must maintain official records in its custody in good order and condition. This includes obligations concerning the capture, storage, maintenance and disposal of physical and electronic official records.
- 1.3 Effective records management is of key importance to effective governance. Records are fundamental in support of the Council's ongoing business activities.

### 2. Legislative Requirements and Corporate Policy Context

- 2.1 Records created or received during Council activities, and business are official records under the *State Records Act 1997* regardless of where they are created or received (e.g. home, private office, Council office) or the means of transmission (e.g. fax, email, courier, hand deliveries). This includes all records created or received by a Council Member during their term of office that relate to their work as a Council Member.
  - 2.2 The *Freedom of Information Act 1991* gives a legally enforceable right of access by members of the public (subject to certain restrictions) to corporate records held by government agencies and councils. Official records of the Council may be accessible to an applicant under this Act.
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2.3 Under Section 99 of the *Local Government Act 1999*, the CEO must ensure that records required under any legislation are properly kept and maintained.

2.4 The *Independent Commissioner Against Corruption Act 2012* established the Independent Commissioner Against Corruption (ICAC) and the Office for Public Integrity (OPI). The primary objectives of these bodies are to identify, investigate and or refer cases of corruption, misconduct and maladministration in public administration.

Additionally, the confidentiality of information (records) in connection with a matter that forms or is the subject of a complaint, report, assessment, investigation, referral or evaluation under this Act must be maintained under this Act.

2.5 The Privacy Policy outlines how the Council manages personal information.

### **3. Policy Objective, Scope and Actions**

3.1 This Policy relates to all records, including official records in any format created, sent or received during Council's business operations.

3.2 The following are not official records:

- Unofficial draft, rough notes and calculations not intended for further use.
- Unsolicited promotional material from an external source (e.g. catalogues, price lists).
- System printouts or photocopies of records used for personal reference purposes only.
- Unimportant phone messages/notes/compliment slips that only hold short term value (hours or days).
- Electioneering material.
- A record made or received by an agency for delivery or transmission to another person or body (other than an agency) and delivered or transmitted (e.g. a simple delivery docket or transmission slip)
- A record received into or made for the collection of a library, museum or art gallery and not otherwise associated with the agency's business.
- A record that has been transferred to the Commonwealth.

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#### **4. Electronic Document Management System (EDMS)**

- 4.1 The EDMS aims to ensure that the management of the Council's information resources and records provide timely and comprehensive information to meet operational business needs, legislative and accountability requirements and obligations and community expectations.
- 4.2 The EDMS ensures the preservation of the Council's "*corporate memory*" through sound record-keeping practices and the accurate creation, capture, storage and disposal of information to meet legal, evidential and accountability requirements.

#### **5. Legal and Policy Obligations on Council Members & Council Employees**

- 5.1 Personal record-keeping systems for the capturing of official records are prohibited. Records must be readily accessible to meet business and accountability requirements.
- 5.2 Council Members and Council employees:
- Must not intentionally damage, alter, dispose of or remove official records of the Council without authorisation to do so under the *State Records Act 1997*.
  - Are required to handle official records with care and respect in a sensible manner to avoid damaging, altering, disposing or removing official records and to prolong their life span; and
  - Must ensure that official records in any format, including electronic documents and electronic messages, which they create, send or receive, are captured into Council's EDMS in the format they were created or received
- 5.3 In addition to clause 5.2, the Information Management Team must follow authorised procedures in carrying out their specific records management functions and duties.
- 5.4 Council Members and Council employees who do not comply with this Policy may be subject to disciplinary action under the relevant Code of Conduct/Conduct Protocol and/or subject to criminal or civil proceedings under the *State Records Act 1997* and/or the *Independent Commissioner Against Corruption Act 2012*. Council Members and the staff may be required to report breaches of the Policy to the CEO.

#### **6. Responsibilities and Accountabilities**

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- 6.1 All Council Members and Council employees need to be aware of record-keeping requirements that affect the performance and exercise of their duties and functions.
- 6.2 The role of the CEO of the Council, as prescribed by Section 99 of the *Local Government Act 1999*, includes ensuring that records required under any legislation are properly kept and maintained.
- 6.3 Council employees must:
- Not disclose confidential information to any third party during or after the course of their employment at Council
  - Make records to support the conduct of their business activities and create records that would not otherwise be created
  - Capture internal, incoming and outgoing official records into Council's EDMS as soon as practicable.
  - Learn how and where records are kept within Council
  - Ensure that Council records are not destroyed without authority from the Team Leader Information Management
  - Be aware of records management policies, standards and procedures and
  - Meet business and accountability requirements.
- 6.4 Council Members must:
- Make records that support the conduct of their Council activities and create records that would not otherwise be created
  - Forward official records to the Information Management Team for capture into the Council's EDMS
  - Where possible, attend training concerning records management practices and policies except in circumstances when such training is mandated under Section 80A of the *Local Government Act 1999*, in which case they must attend and
  - Be aware of records management policies, standards and procedures.
- 6.5 Council Members and Council Employees should take all reasonable measures to ensure any mail regarding personal affairs is sent to their personal address.
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## **7. Access to Information**

- 7.1 Council Members, the CEO and Council employees will have different and appropriate access to information and records of Council based on their role, the information, or combination of both.
- 7.2 Responsibility is assigned to individual Council employees to ensure sensitive information is preserved in confidence.
- 7.3 In addition to the confidentiality clauses included in contracts of employment and the Employee Conduct Protocol, Confidentiality Agreements must be signed by members of the Information Management Team.

## **8. 'Private and Confidential' Addressed Mail**

- 8.1 Subject to clause 10.2, the Information Management Team will open, capture and process all mail, including mail addressed 'Private and Confidential'. Council mail stamped or marked 'Private and Confidential' may still be an official record. If, on opening, a record marked 'Private and Confidential' is deemed an official record, it will be scanned and captured by an Information Management officer and assigned to the appropriate level of security in Council's EDMS.
- 8.2 The CEO must ensure that written procedures and contractual arrangements with staff are in place to ensure that confidentiality concerning Ombudsman and ICAC/OPI matters is systematically maintained.

## **9. Handling Records generated outside of the Electronic Document Management System (EDMS)**

- 9.1 Councils' primary information system is the Electronic Document Management System (EDMS) known as TechnologyOne ECM. The EDMS complies with the requirements set out in the *State Records Act 1997* for managing the Council's corporate information.
- 9.2 There are other business systems that have been endorsed to manage Council's corporate information. Transactions and information held in these systems will not be automatically captured, however records need to be manually registered into the EDMS when appropriate based on the records management guidelines.
- 9.3 Where possible, corporate information captured through other business systems is automatically transferred into Council's EDMS through automation.

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## 10. Storage of Council Records in Offsite Secure Facility

- 10.1 The storage of Council records in the offsite secure facility, where the Council retains lawful ownership and control, is consistent with the Council's obligations under the *State Records Act 1997*. This practice may be authorised by the Chief Executive Officer (CEO) under this Policy, provided the CEO is satisfied that:
- The records will be maintained in good condition, securely and safely
  - The records will be disposed of while offsite; and
  - The records will be readily accessible and produced to Council upon request.
- 10.2 The Information Management Team will maintain an Information Asset Register of Offsite Storage to record all documents stored outside of the standard record-keeping practices at the City of Burnside's offsite secure facility. The register will include the following details:
- A general description of the record(s) including dates and
  - Council's disposal obligations under the *State Records Act 1997*

## 11. Records Security

- 11.1 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.
- 11.2 Council Members and Council employees are responsible for the safe custody of all files and documents allocated to them. Sensitive or confidential information should be placed in a secure storage area when not in use. When the action has been completed, the file/documents must be returned to the Information Management Team for secure storage.
- 11.3 The Council's onsite compactus is locked overnight to prevent any unauthorised access. The onsite compactus is managed exclusively by the Information Management Team, who are the only staff with access and hold the keys for security purposes. This controlled access supports risk mitigation strategies and reduces the potential for damage caused by water, fire, or other hazards in the event of a disaster.

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In the event of Council elections, the designated Electoral Contact Officer may be granted temporary access to the Information Management compactus or the sole purpose of securely storing ballot papers on the election days. This arrangement supports the secure handling of election related materials and aligns with Council's commitment to secure information management practices.

- 11.4 Council records are not to be stored at home or left in cars unattended as they could be lost, damaged or stolen.
- 11.5 No Council records are to be provided to any external organisation or individual outside of the Council. All external requests for access must be referred to the Team Leader Information Management for assessment and appropriate action.
- 11.6 Vital records should be stored in protective or fire-resistant conditions with suitable access conditions.
- 11.7 Confidential physical records must be stored in a locked storage cabinets or compactus that are accessible only by authorised persons.

## **12. Retention and Destruction of Records**

- 12.1 Records and official records must be retained and disposed of in accordance with authorised disposal schedules for Local Government Authorities in South Australia.
- 12.2 The Team Leader Information Management is responsible for destroying the Council's official records under the *State Records Act 1997* and relevant disposal schedules. Individual Council Members or Council employees may only destroy the records identified as non-official records under this Policy.
- 12.3 The Information Management Team is responsible for coordinating a structured and compliant approval process to authorise the destruction of official Council records, in accordance with legislative and organisational requirements.
- 12.4 Records must be destroyed completely to prevent any possibility of retrieval. Physical records should be shredded and pulped. Electronic records must be securely erased using methods such as overwriting or reformatting. Simply deleting electronic files is not sufficient, as data may still be recoverable.

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### **Other Useful Documents**

### **Related Documents**

- Closed Circuit Television (CCTV) and Recording Policy
- Code of Practice – Access to meetings and Documents

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- Employee Conduct Protocol
  - Privacy Policy

## Relevant Legislation

- Australian Privacy Principles (APPs)
- *Copyright Act 1968*
- *Evident Act 1929*
- *Freedom of Information Act 1991*
- *Independent Commissioner Against Corruption Act 2012*
- *Local Government Act 1999*
- *Ombudsman Act 1972*
- *Privacy Act 1988*
- *State Records Act 1997*
- *Surveillance Devices Act 2016 (SA)*

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## Glossary

Throughout this document, the below terms have been used and are defined as:

**CEO:** means Chief Executive Officer

**Confidentiality Agreements:** are agreements entered into by Council's Information Management Team responsible for handling mail marked 'private and confidential' that prohibits staff from disclosing confidential information in their possession except where expressly authorised to do so or in the extent necessary to perform their duties.

**Continuing Value:** records contain information of administrative, legal, fiscal, evidential or historical value to the Council.

**Council Business:** includes (but not limited to) the provision of services, delivery of programs, development of policies, making of decisions, the performance of Council functions and other similar types of transactions.

**Council Employees:** includes persons employed by the Council, volunteers, trainees, work experience placements, independent consultants and contractors and other authorised personnel offered access to the Council Administration's systems or processes.

**Disposal Schedule:** means a determination made under section 23 of the *State Records Act 1997* and that applies to the management and disposal of official records for local government under that Act.

**Dispose:** to disposal of an official record means to:

- Destroy or abandon the record.
- Carry out 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; or



- Transfer or deliver ownership or possession of or sell the record or declare to do so. It does not include transferring or delivering the record to the State Records Office or between Council and another agency.

**Council Member:** a person appointed or elected as a councillor of a Council under the *Local Government Act 1999*.

**Electronic Document Management System (EDMS):** is an enterprise content management system that allows for the management (creation, use, capture, retention and disposal) of corporate records. The City of Burnside uses the TechnologyOne ECM software as Council EDMS.

**Information Management Team:** are officers employed by the City of Burnside responsible for, amongst other things, ensuring Council complies with its records management obligations under the *State Records Act 1997*.

**Official Record:** is a record made or received by the Council in conduct of its business.

**Record:** a record means:

- Written, graphic or pictorial matter, or
- A disk, tape, film or another object that contains information or from which information may be reproduced (with or without the aid of another object or device), and includes part of record, a copy of a record and an object or matter that is attached or annexed to a record or is reasonably required to interrupt, explain or comprehend a record, or usually accompanies, or comprises a part of a record.

**Vital Records:** are 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 record management and disaster planning,

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**Administrative** As part of Council's commitment to deliver the City of Burnside Strategic Community Plan, services to the community and the provision of transparent information, all policy documents are reviewed as per legislative requirements or when there is no such provision a risk assessment approach is taken to guide the review timeframe.

This Policy document will be reviewed every 4 years unless legislative or operational change occurs beforehand.

**Adoption Date:** 18 November 2025

**Review Date:** November 2029

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<b>Strategic Plan Reference</b>	<b>Principles:</b> Spans all Strategic Plan Principles
	<b>Theme:</b> Spans all Strategic Plan Themes
	<b>Goals:</b> Spans all Strategic Plan Goals
	<b>Priorities:</b> Spans all Strategic Plan Priorities

## Review History

ECM Reference:	Authorising Body:	Date/Decision ID	Description of changes
1308714	Council	13 September 2011 CCS0036	
		12 October 2021 C121021/12967	
		12 October 2021, C121021/12967	Format change to new template Updated: <ul style="list-style-type: none"> <li>• Related documents</li> <li>• Legislative requirements and corporate policy context</li> <li>• Definitions</li> </ul>
		C112025/14052	

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