

Information Management Policy

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1. Purpose

The purpose of this policy is to outline the responsibilities and practices of Council's records management system, emphasising the importance of records in preserving history, maintaining corporate memory, meeting legislative requirements,¹ and ensuring transparency, accountability and security.

2. Scope

2.1. This policy applies to all Council Members and employees.

2.2. This policy applies to all records (hard copy and electronic), which are created, collected, captured, processed, used, sentenced, stored and disposed of in the conduct of official Council business. All procedures and records management systems are to be consistent with this policy.

3. Definitions

3.1. **access** means the right, opportunity, means of finding, using or retrieving Council information;

3.2. **Act** means *Local Government Act 1999*;

3.3. **capture** means the registration of a record into Council's EDRMS;

3.4. **CEO** means Chief Executive Officer of Council;

3.5. **community** means any person who lives, works, pays rates, conducts private or government business, visits, utilises services, facilities and public space within the Council area (may also be referred to as a stakeholder);

3.6. **Council business** means (but is not limited to) the provision of services, delivery of programs, development of policies, making of decisions, performance of Council functions and other similar types of transactions;

3.7. **Council** means Adelaide Plains Council;

3.8. **Council Member** means a member of Council elected in accordance with the Act;

3.9. **destruction** means the permanent deletion, destruction or elimination of a record;

3.10. **Electronic Document and Records Management System (EDRMS)** means a system used to manage records across Council;

3.11. **employee** means any person carrying out duties or performing tasks for and on behalf of Council, whether they are paid or unpaid, including staff, contractors, consultants, trainees, volunteers, students and any other person who has access to Council's electronic systems and services in a full-time, part-time or casual capacity;

3.12. **official record** means a record created, sent, received, forwarded or transmitted by employees and Council Members in the performance and discharge of their functions and duties in conduct of Council business.² Records that are merely transitory, ephemeral, personal or private in nature will fall outside the definition of an official record;

3.13. **record** means any 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) relating to Council business; and

3.14. **security** means the restriction of access to a record, by physical or electronic means.

¹ *State Records Act 1997; Freedom of Information Act 1991; Local Government Act 1999.*

² See definition of "official record" in section 3(1) of the **State Records Act 1997**; e.g. diaries/calendars, conversations that relay information or involve matters of significance to conduct Council business, working papers/drafts, messages, social media posts, etc.

4. Our Core Values

Our approach to information management is underpinned by Council’s core values:

 Honesty and Integrity	 Innovative and Open-minded	 Leadership and Diplomacy	 Professionalism	 Respect	 Teamwork
Building trust and loyalty with the community and within Council.	Being proactive in continually improving our services.	By acting strategically and effectively managing our relationships.	Through commitment, quality and timeliness of work delivered.	For others, acting with humility and empathy.	Through unity, cooperation and support.

5. Capturing records

All official records must be complete, accurate and reliable (in full), and captured in Council’s EDRMS.³

5.1. Record keeping for Council Members

Council Members are required to maintain records within their own duties and functions that relate to Council business. The record keeping obligations for Council Members include:

- (a) creating records to support the conduct of Council business;
- (b) not losing or misplacing records;
- (c) not destroying official records without authority;
- (d) forwarding any records to Info@apc.sa.gov.au for registration and/or filing;
- (e) providing hardcopy records received or created to CEO (or delegate) for filing or disposal;⁴
- (f) being aware of, and comply with Council’s *Information Management Procedure*; and
- (g) understanding why, how and where records are kept.

5.2. Record keeping for employees

Employees are required to maintain records within their own duties and functions that relate to Council business. The record keeping obligations for employees include:

- (a) creating records to support the conduct of Council business activities;
- (b) not losing or misplacing records;
- (c) not destroying official records without authority;
- (d) ensuring official records are captured into the EDRMS;
- (e) forwarding official records for filing (where applicable);
- (f) being aware of, and comply with *Information Management Procedure*; and
- (g) understanding why, how and where records are kept.

5.3. Social Media

All content, comments, private messages and interactions between Council and Council Members and the community on Social Media in the conduct of Council business, are considered official records and must be captured and maintained within Council’s EDRMS.

Refer to Council’s ***Social Media Policy*** and ***Digital Media Strategy*** for more information.

³ As per section 99(1)(h) of the *State Records Act 1997*.

⁴ Including all agendas, minutes and reports.

6. Retention and disposal

- 6.1. Official records will be retained, and disposed of, in accordance with the *General Disposal Schedules for Local Government Authorities in South Australia*.⁵
- 6.2. Council will not intentionally delete, destruct or alter official records.⁶
- 6.3. Transitory or ephemeral records, or records that are personal or private in nature, may be destroyed in accordance with normal administrative practice.⁷

7. Record security

- 7.1 Council Members and employees are responsible for the security of records.
- 7.2 Records must not to be stored at home or left in vehicles unattended (as they could be lost, damaged or stolen).⁸
- 7.3 Sensitive or confidential information must be placed in a secure area when not in use.

8. Access to information

8.1. Community access

- (a) As required, documents and information are made available to the community by Council.⁹ Many documents are published on Council's website: www.apc.sa.gov.au. Refer to Council's **Code of Practice–Access to Meetings & Documents** for more information.
- (b) Requests by the community or media for access to Council information that is not publically available are managed by an Accredited Freedom of Information Officer.¹⁰
- (c) Any information protected by section 90 of the Act is unavailable for public access until determined by Council.¹¹

8.2. Council Member access

- (a) At any reasonable time, Council Members are entitled to access records in the conduct of official functions and duties.¹²
Note: The right of access is not the same as right to publish, or otherwise make public. Council Members should be mindful of confidential information.
- (b) A request for access to records must be made in accordance with Council's **Communication Policy**. A Council Member must make it clear, at the time of making the request, if the request is in their capacity as a Council Member or ratepayer. Access to records by a Council Member in the capacity as a ratepayer will be conducted in accordance with 8.1. of this policy.

⁵ The destruction of records must be complete destruction so that no information is retrievable—physical records should be destroyed by shredding or pulping—electronic records should be destroyed by reformatting, rewriting or degaussing of the physical storage media.

⁶ Section 17 of the *State Records Act 1997*.

⁷ **Normal administrative practice** means the routine destruction of drafts, duplicates and publications, with the test that it is obvious that no information of more than transitory or ephemeral value to the Council will be destroyed. **Ephemeral** means information relating to personal activities, drafts, reference material, duplicates etc., which have no value to the business of Agency and do not add value to another record;

⁸ Includes electronic records, and hard copy agendas, minutes and reports.

⁹ Schedule 5 of the Act.

¹⁰ Under the *Freedom of Information Act 1991*.

¹¹ Refer to section 90 of the Act.

¹² Section 61 of the Act.

- (c) Where there is a degree of sensitivity or there are other reasons to restrict distribution of a document access may be limited to ‘view only’.¹³
- (d) A Council Member, or former Council Member, must not make improper use of information, position or disclose information in which there is an order of Council or Council committee in effect under section 90 of the Act.¹⁴
- (e) Where information is sought by a Council Member in relation to official functions and duties, such information may be deemed to have equal relevance for all Council Members (involved in the decision-making process).

8.3. Employee access

- (a) Official records within Council’s EDRMS can be subject to restrictions to minimise employee access to information not related to their role or that are confidential in nature.
- (b) It is the responsibility of employees to ensure they are accessing documents they have permission to, and treat confidential information accordingly.

9. References

Australian Records Management Standard AS ISO 15489-2016
Freedom of Information Act 1991
Local Government Act 1999
State Records Act 1997

10. Records management

All documents relating to this policy will be registered in Council’s Electronic Document and Records Management System and remain confidential where identified.

11. Document review

This policy will be reviewed in accordance with Council’s *Policy Review Schedule* to ensure legislative compliance and its continued relevance to Council’s needs, activities and programs.

12. Further information

Public Access:	Members of the public may inspect this policy free of charge at: Council’s website: www.apc.sa.gov.au ; or Council’s Principal Office: 2a Wasleys Rd, Mallala SA 5502. <i>A copy of this policy may be obtained on payment of a fee.¹⁵</i>
Queries:	Any queries in relation to this policy must be in writing to info@apc.sa.gov.au, marked: <i>Attention: Manager Governance</i>

¹³ For example, if the documents contain legal advice, confidential information or internal corporate information.

¹⁴ Section 62 of the Act.

¹⁵ As outlined in Council’s *Fees & Charges Schedule*.