

Western Parkland City Authority

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Records Management Framework

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Document control

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* *The Government Information (Public Access) Act 2009 (the GIPA Act) requires that all of the Department's current policy documents be made available on this website (unless there are overriding public interest reasons why that should not be done). WPCA Legal Branch can provide advice.*

Document approval

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Review date

The Authority will review this Policy every two years or more frequently if required. It may be reviewed earlier

in response to a change in the Australian Government or NSW guidelines.

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Introduction

Policy Statement and Objective

This Record Management Framework (Framework) complies with the obligations under the State Records Act 1998 (the Act) to establish and maintain a records management program for the Western Parkland City Authority (WPCA) and to conform with standards and codes of best practice for records management that are approved by the State Archives and Records Authority of New South Wales (SARA).

The Act requires WPCA to make and keep full and accurate records of its activities and to protect these records.

The purpose of the Framework is to manage records as vital WPCA assets that:

- support WPCA business activities;
- enable access to information for business continuity;
- provide evidence and corporate memory of WPCA's activities

Scope

This Framework applies to all staff including contractors, consultants, temporary staff, interns, trainees, and those undertaking work experience, referred to as staff throughout this policy and applies to records in any form that are created or received by WPCA to support and provide evidence of its business activities.

This Framework applies to all WPCA records. It governs, and must be read in conjunction with, the following policies and procedures:

- WPCA Record Creation, Capture and Storage Policy and Procedure
- WPCA Email Record Capture Policy and Procedure
- WPCA Record Retention and Disposal Policy and Procedure
- WPCA Information Labelling Classification & Handling Policy
- WPCA Authorisations and delegations: State Records, GIPA and PID

This Framework is located on the WPCA's Intranet.

Framework

State Record

The Act defines a State Record as any record made and kept, or received and kept, by any person in the course of the exercise of official functions in a public office, or for any purpose of a public office, or for the use of a public office.

In this context, a record means any document or other source of information compiled, recorded or stored in written form or on film, or by electronic process, or in any other manner or by any other means.

In general, all records made or kept in the course of WPCA's functions will be State records for the purposes of the Act.

At WPCA, State records are generally maintained in WPCA's electronic document and records management system (EDRMS), Objective.

If the mode of communication cannot be easily captured in its native form, a file note or email capturing the activity may be created and stored in Objective.

Record creation, capture and storage

WPCA must make and keep full and accurate records of its activities and decisions.

Objective is generally used to register, store, approve, track, and retrieve electronic records that are received or generated by WPCA.

WPCA records should not be saved and stored in shared folders In One Drive, Teams or SharePoint.

Staff must not use personal drives or storage media such as memory sticks, and DVDs to save, store, and manage records.

For guidelines on WPCA records, drafts, working papers, messages and physical records, refer to WPCA Record Creation, Capture and Storage Policy and Procedure.

Government Information (Public Access) Act

The [Government Information \(Public Access\) Act 2009](#) (GIPA) promotes a system of responsible and representative democratic government that is open, accountable, fair and effective.

The fundamental principle of GIPA is that access to government information should be provided unless, on balance, it would be contrary to the public interest to provide that information.

Under GIPA, government information is information:

- contained in a record held by WPCA, or
- held by a private sector entity and WPCA has an immediate right of access to it, or
- held by the SARA and WPCA has an immediate right of access to it (other than a record withheld from public access under s59 of the Act), or
- held in the possession or under the control of a person in their capacity as an officer of WPCA, including information held at home or on a home computer by officers who work from home.

As the information in a record is subject to GIPA, staff need to be aware of this and to adhere to the Records Management Framework and the policy and procedures governing the creation, management, and disposal of records.

For more information on GIPA refer to the *Government Information (Public Access) Act 2009* and the Authority's *Agency Information Guide*.

Record Classification and Labelling

The NSW Government [DCS-2020-07 NSW Government Information Classification, Labelling and Handling Guidelines \(July 2021\)](#) requires information to be assessed on its confidentiality and sensitivity to ensure it receives an appropriate level of protection.

In classifying information, regard must be given to obligations imposed by relevant laws and regulations, the:

- *Privacy and Personal Information Protection Act 1998*,
- *Government Information (Public Access) Act 2009*,
- *State Records Act 1998*, and
- *Health Records and Information Privacy Act 2002*.

The NSW Government Information Classification, Labelling and Handling Guidelines provide security labels to be applied to records captured and stored in Objective. Refer to the WPCA [Information Classification Procedure](#) on how to apply appropriate classification labels on records in Objective.

EDRMS access and security privileges

The Records Management Team manages staff access to all records within Objective.

The Records Management Team, in consultation with Senior Executives, applies the business rules governing staff access at an organisation, branch and functional level within Objective.

The Records Management Team apply security privileges to control access to folders, files, and records in Objective.

All change requests regarding staff access, file plan security privileges or organisational folder and file changes must be lodged through wpcarecords@wpcasidney.

Change requests relating to staff access must be approved by the staff member's direct manager for information that is assessed to be non sensitive and the Executive Director for information classified as commercially sensitive.

State Archives

State archives are State records that SARA has control of under the Act. In practical terms, these are State records of continuing value that have been designated as required as State archives and which are no longer in use or current for official purposes.

SARA has assigned disposal authorities FA0260 and FA0262 to WPCA to guide the retention and disposal of its unique State records. GA28: General Retention and Disposal – Administrative Records also applies for records common to all public agencies.

Digital records, like paper or other formats, are eligible to become part of the State archives when:

- they are identified as required as State archives in a current authorised retention and disposal authority, and
- they are no longer in use for official purposes.

The Records Management Team will, in conjunction with individual business units, identify all records required as State archives, and will routinely transfer those records to SARA when no longer in use for official purposes.

The Records Management Team will follow the Guidelines issued by SARA under section 29 of The Act, establishing the basic requirements to be met for transfer of records (in any format) in a secure manner to the SARA.

Retention and disposal of records

State Records are protected and must only be disposed of in circumstances that are in accordance with general and functional retention and disposal authorities, which relate to WPCA records, or with specific approval from SARA.

Records may also be disposed of in accordance with Normal Administrative Practice (NAP), as provided for by the Act, which includes the disposal of certain types of facilitative and duplicate records.

For more information on the retention and disposal of WPCA records refer to [WPCA Record Retention and Disposal Policy and Procedure](#).

Training

WPCA provides the following training in records management, including:

- Introduction to Objective EDRMS and Workflow basics
- Records Management Obligations
- One on One training as required on request
- Business Unit Training Workshops as required

As part of the WPCA onboarding process all new staff should enrol after receiving the Objective access email to attend the Objective EDRM and Workflow basic course.

The Records Management Training Program is dynamic and reflects evolving record keeping requirements and EDRMS developments. Changes to the Records Management Framework will be published on the WPCA Intranet and all staff will be encouraged to attend ongoing Objective training to optimise records management

within WPCA.

Responsibilities

Senior Responsible Officer

The CEO has authorised the Director Corporate Services as the Senior Responsible Officer of WPCA. This role:

- may report to the CEO directly on records management issues
- is responsible for ensuring that records and information management is in place and operating effectively to support business operations
- has been assigned strategic and managerial responsibility for records and information management

Director Corporate Services

- The Director Corporate Services owns the Records Management Framework, Policies and Procedures and is responsible for reporting to SARA regarding recordkeeping compliance.

The Director Corporate Services is responsible for ensuring the Framework

- is adopted at the Senior Executive level
- requires that records and information management is assessed and addressed in all outsourced, cloud and similar service arrangements
- is reviewed on a regular basis to consider changes in business activities and priorities
- aligns records and information management practices with the objectives and activities of the organisation and support business operations
- addresses the management of records and information in all formats

As SRO the Director, Corporate Services has responsibility to ensure the following:

- records and information management strategies and operational plans are adequately resourced and technology is efficient
- WPCA complies with NSW State Records keeping Legislation, Standards, and other approved codes of best practice
- internal development, implementation, monitoring and compliance of WPCA's Records Management Framework, Policies and Procedures, to ensure that WPCA records requirements are met

The SRO must ensure that all staff

- have appropriate records and information management skills to implement records and information management strategies and operations; and
- receive training appropriate to their positions on recordkeeping and information on how to use tools/systems for recordkeeping

The SRO must

Consider the retention and disposal requirements for records and information prior to the decommissioning of any business system

Senior Executives

Senior Executives have an obligation to:

- ensure staff adhere to the Records Management Framework, Policies and Procedures
- ensure all staff are trained in record keeping on WPCA Objective EDRMS

Senior Executives should also identify any legislative and business requirements specific to their areas and communicate them where relevant to the Records Management Team to incorporate in Objective.

All WPCA Staff, Contractors and Consultants

All staff have a responsibility to keep proper records and comply with the Records Management Framework.

They must:

- understand and assess what is a State record and the need to protect such records
- generally, capture and manage records in the Objective EDRMS, in accordance with the file plan and business rules governing record keeping in Objective
- not relinquish (or handover) control or destroy records of WPCA without authorisation to do so.
- adhere to security and access controls established for the safe keeping of records and information
- before exiting WPCA, ensure all records from repositories such as OneDrive, SharePoint and Outlook have been captured in Objective.

People and Culture Team

The People and Culture team must communicate staff changes to wpcarecords@wpcasidney regarding access to Objective.

This includes:

- On-boarding and Off-boarding of staff
- Change in staff roles, WPCA secondments, secondary roles
- Staff extended leave including, Long Service, Parental leave, extended Holidays, extended Sick or Carers leave etc

External parties

Where necessary, contracts or agreements with external parties where the WPCA has outsourced any function or activities, or with whom the WPCA has entered any service arrangements with (including cloud computing arrangements), must include records and information management provisions.

These must ensure compliance with our legislative obligations relating to the management of our records and information and minimise risks associated with the external storage of records and information, and the WPCA's right to access information held by the contractors

Risk assessment

Risk should be managed in accordance with the WPCA'S relevant risk and compliance policies and frameworks. All business areas are to conduct a risk assessment of records management in their business processes and the systems that manage them. The Executive Director, Governance is responsible for overseeing the risk assessment and reporting risks in accordance with WPCA policy and frameworks

Working away from the workplace

Care must be taken when working away from the workplace, such as public places or at home.

Each staff member is responsible for protecting records, information, and data in their possession and must:

- take reasonable measures to prevent any loss or damage, or unauthorised access;
- inappropriate disclosure of records, information, and data;
- ensure confidential, sensitive, or personal information and devices with any associated records, information and data are not left where unauthorised individuals may be able to view any content; and
- ensure records (and any device/s that may contain work-related records, information, and data) are locked when not in use, and not left unattended for example in unsecured vehicles.

Monitoring and Review

To ensure compliance with this Framework and with legislative requirements, the WPCA will monitor record-keeping. The WPCA will liaise with SARA as required on compliance-related issues. The SRO and the Records Management Team will undertake regular assessments of business unit performance against the records management policy and any supporting procedures or guidelines.

Access within WPCA

Records must be accessible to all staff in WPCA so that staff who have a 'need-to-know' can perform their roles effectively and efficiently. Exceptions include when required by law to restrict access, or where there are confidentiality, privacy, sensitivity, legal, commercial probity or other legitimate reasons for limiting access.

Access for Members of the Public

By law, only specifically authorised staff of WPCA can disclose private and confidential information or information relating to WPCA generally.

Access to WPCA's records, information, and data by members of the public is governed by the *Government Information (Public Access) Act 2009 (NSW)*(GIPA), the *Privacy and Personal Information Protection Act 1998 (NSW)* (PPIPA), the *Health Records and Information Privacy Act 2002 (NSW)* (HRIP) and the *State Records Act 1998 (NSW)*. This applies to all records in any format held by the WPCA and stored in any location. Please see

the Authority's Agency Information Guide.

Subpoenas or Legal Warrants

Staff must seek advice from WPCA's Legal Team before responding to a request for information from an external party as part of a subpoena or legal warrant.

Standing Order 52

The Legislative Council can pass a motion under Standing Order 52 requiring WPCA to produce documents to the Council.

Under Standing Order 52, any member of the Legislative Council may give notice of motion for an order for papers. Usually, the notice will relate to a particular decision of Government that has become a matter of broad public interest. The motion will list the government agencies and Ministers' offices sought to be the subject of the order.

The Executive Director Governance will be responsible for compliance with a Standing Order 52 request.

Further Assistance

For advice and further assistance, contact wpcarecords@wpcasdney.

Legislation, Standards & Guidelines

- [Western Parkland City Authority Act 2018 No 53](#)
- [State Records Act 1998](#)
- [Crimes Act 1900 No 40](#)
- [Evidence Act 1995 No 25](#)
- [Electronic Transactions Act 2000 No 8](#)
- [Government Information \(Public Access\) Act 2009 No 52](#)
- [Health Records and Information Privacy Act 2002 No 71](#)
- [Privacy and Personal Information Protection Act 1998 No 133](#)
- [Public Interest Disclosures Act 1994 No 92](#)
- [AS ISO 15489.1: 2017 Information and documentation - Records management, Part 1: Concepts and principles](#)
- [Standard No. 12 Records Management 2018](#)
- [Standard No. 13 Physical Storage of State Records 2018](#)
- [WPCA Code of Ethics and Conduct](#)
- [DCS-2020-07 NSW Government Information Classification, Labelling and Handling Guidelines July 2021](#)
- [DCS-2021-02 NSW Cyber Security Policy April 2021](#)
- [General Retention and Disposal Authorities Administrative Records \(GA28\)](#)

- Functional Retention and Disposal Authorities: FA0260
- Functional Retention and Disposal Authorities: FA0262

Western Parkland City Authority

Level 2, 10 Valentine Avenue
Parramatta NSW 2150

T: 1800 312 999
E: hello@wpcasidney
W: wpcasidney
