District Council of
Loxton Waikerie

Records Management Policy

Responsible Officer/s	Records Officer Director of Commercial and Community
Relevant Legislation / Documents	State Records Act 1997 Archives Act 1983 Freedom of Information Act 1991 Local Government Act 1999 Freedom of Information Act 1991 Copyright Act 1968 Relevant Standards: ISO 15489 Records Management Information Management Standard 2023 Policy and Procedure: Council's Electronic Communication Facilities Policy Council's Codes of Conduct for Council Members and Employee Code of Conduct Policy Elected members Records Management Policy and Procedure Records Management Procedure Records Management Procedure - employees transfer of records Document History and Version Control Procedure Source Records Management Procedure Destruction of Official Records Procedure Digitisation and Disposal of Source Records Policy and Process
Adopted	19 May 2006
Reviewed	16 March 2026
Next Review	18 March 2028 (every 2 years)

A. Purpose

The Council has an obligation under the State Records Act 1997, Local Government Act 1999, and Freedom of Information Act 1991 and other relevant legislation to create, manage, maintain and provide timely access to information.

Adherence to this Policy will ensure the Council is able to:

- Meet its legislative responsibilities;
- Provide and efficient and effective working environment;
- Provide evidence of business transactions and accountability;
- Validate and support decisions, actions and interactions; and
- Protect the interests of staff, elected members and stakeholders.

B. Objective

The objective of this policy is to outline and direct the practices of the staff, volunteers, consultants and contractors of the District Council of Loxton Waikerie (Council) in relation to the management of records. Records of the Council are created and received as a result of internal activities, interaction with residents and ratepayers, the public, clients, other organisations, government entities and businesses.

Recordkeeping practices, including the use of the Content Manager Electronic Document and Records Management System (EDRMS), providing staff with timely access to accurate and up to date information, which will in turn provide staff and the Council with a more efficient and effective working environment. This will lead to benefits for customers in the provision of timely responses to complaints, queries and requests, ensuring the Council's integrity and reputation are maintained.

C. Policy

Council operates in an accountable and community service environment and is committed to maintaining a records management framework that meets its business needs, as well as its legislative and accountability obligations, whilst aligning with industry best practice.

The records resulting from the business processes of the Council will be created, received, captured and managed to:

- Support continuing conduct of business and accountability;
- Protect the integrity;
- Enhance the efficiency;
- Preserve the history and
- Provide a business context of the Council

Records will be locatable, readable and able to be reproduced for the life of the record.

Business processes include decisions made, actions taken, transactions and interaction.

1. Scope

This Policy applies to all business processes and all locations of the Council. It applies to all records and information created and received in the conduct of business, including inactive records in the custody of the Council.

This Policy applies to all:

- Business functions and activities of the Council;
- All sites of Council;
- Records created and stored in all formats; and
- Staff, volunteers, consultants and contractors.

2. Creation

Records will be created where there is a legislative, business, fiscal, stakeholder or risk-based requirement to document evidence of a transaction, decision, action, interaction or communication. When records are created they will be complete, accurate and reliable and be created in a format and media that is readable and accessible for the life of the record.

3. Capture

Records in all formats, including emails, will be captured into the corporate EDRMS (Content Manager), as soon as practicable after creation or receipt. Records will not be stored on personal devices, in personal recordkeeping systems, drives (both personal or Network) or Outlook accounts but captured into the Content Manager system.

If directed by an approved policy or procedure, records can be captured in alternative systems.

4. Integrity

The integrity of the records of the Council will be maintained by ensuring:

- Records are current, locatable, unaltered and inviolate.
- Duplicates are controlled and clearly identified.
- Versions are managed within the Content Manager system.
- Derogatory or negative opinions regarding a person or group should not be recorded.
- Storage is appropriate for the record and its format.
- Additional information regarding an action or decision is recorded.
- Migration and conservation are managed to ensure accessibility and readability for the life of the record.

5. Access

Access to information will be controlled in line with the requirements of the council, both internal access by staff and external access by stakeholders. External requests for access to information that is not already publicly available come under the Freedom of Information Act 1991. The control of access to information includes the protections of personal, confidential and sensitive information. From internal and external access, and the proactive disclosure of publicly available information as required.

6. Disposal

Records must only be disposed of (destroyed or retained) in accordance with authorised disposal schedules (General Disposal Schedule 40 for Local Government and other applicable schedules at the time of disposal), as prescribed by the State Records Act 1997.

Council must apply the State Records of South Australia's guidelines and standards must be applied to both the destruction of temporary retention records, and the transfer of custody to State Records of permanent retention records.

Records management staff make the disposal decisions relating to records and other staff must not destroy, alter, damage or remove records they have access to. Penalties apply to the individual for the intentional removal, alteration, or destruction of a record without authorisation to do so.

D. Responsibilities and Accountabilities

1. Chief Executive Officer

The Chief Executive Officer of the District Council of Loxton Waikerie is responsible under Local Government Act 1999 to ensure that:

- Records required under this or another Act are properly kept and maintained; and
- Appropriate and prompt responses are given to specific requests for information.

The CEO is also responsible for:

- The authorisation of the alteration and validity of records occurs.
- Ensuring that this policy is communicated and implemented at all levels in the Council.
- Assigning responsibilities for recordkeeping.
- Authorisation of the destruction of records.

2. Directors and Managers

The Chief Executive Officer, Directors and Managers are responsible for the Council meeting its records management compliance requirements by ensuring:

- Records management policy and procedures are included in induction training.
- Staff receive records management training appropriate to their role, including refresher training.
- Recordkeeping responsibilities are included in position descriptions and performance reviews.
- Staff within their sections adhere to the records management policy and procedures.
- They act on records management monitoring and auditing reports in relation to the performance of their staff.
- Ensure recordkeeping responsibilities are included in contracts, where appropriate.

3. Records Management Staff

Records Management staff are responsible for the management and maintenance of the records management framework by:

- Undertaking records management processes and making and implementing recordkeeping decisions such as capture, classification, access, storage and disposal in relation to the records of the Council.
- The development and review of records management policies, procedures and guidelines.
- Monitoring, auditing and reporting on the recordkeeping program, system (Content Manager) and the practices of staff.
- Providing advice on the use of the corporate records management system, (Content Manager) and processes to Directors, Managers and staff.
- Management of the disposal program including the destruction of records.
- The management of Source Records (hard copy records that have been scanned).

4. Staff, Consultants and Contractors

It is the responsibility of all staff, volunteers, contractors and consultants to adhere to this Policy by:

- Creating adequate records that reflect the decisions made and actions taken.
- Capturing records into the Content Manager system, or other approved system and following the relevant procedures in the use of the system.
- Protecting records from damage or loss by ensuring they are captured in the Content Manager system.
- Not altering, removing, destroying or deleting records without proper authority to do so.
- Ensuring all activity carried out on records is recorded and maintained.

- Ensuring the integrity of the Council is maintained.
- Protecting records from invalid access and ensuring information of a personal, commercial in confidence or confidential nature is not disseminated.
- Ensuring all records created and managed in the conduct of business form part of Council's record holdings and are the property of the Council.
- Forwarding all hard copy records to the Records Management team for ongoing management. This includes records that have been scanned or require scanning.
- Do not retain duplicates of records that are not records in their own right. (Have been altered or additional information added)
- Undertake remedial action in the Content Manager system when anomalies are identified by the records management staff.
- Contractors, consultants and Elected Members are responsible for furnishing records to the relevant staff member for ongoing management by Council.
  Note: The responsibilities of Volunteers, Consultants and Contractors may differ dependent on their role and activity within Council.

E. Policy Description

1. Record Creation

Where there is a business, fiscal, legal, risk or stakeholder requirement for evidence of a transaction, decision, action or communication; a record must be created.

Where appropriate, the business knowledge of staff should be documented, not just committed to memory, to assist in business operations and future incumbents in undertaking a role.

A record may be created, received and stored in various formats and media. Records include, but are not limited to, letters, reports, photos, e-mails, plans, agendas, minutes, notes, recordings, publications and databases.

Records will be created when:

- Advice is given, as evidence of what was said, including documenting phone and face to face advice.
- A decision is made, as evidence of what was decided, when and by who e.g. minutes of meetings or file notes.
- An action or activity has taken place e.g. maintenance work undertaken, arrangements for a service.
- An issue or potential issue or crisis arises, including possible litigation or one that might be subject to media exposure and may have an impact on or embarrass the Council.
- Responding to correspondence, complaints or other communication, including phone response to communication.
- There is a legislative requirement to do so.
- Risk to Council is identified.

Records need to be:

- Complete, accurate and meaningful to provide a reliable and valid account of what they document.
- Inviolate (not able to be altered after they are transacted or are the final version).
- Created as soon as practicable after an event or action to ensure they are a reliable and accurate account of what took place.

For records to be authentic, complete and accurate they need to comprehensively identify:

- Exactly what took place.
- Who decided.
- Who authored it.
- When an action or decision took place.
- That it originates from the Council.
- When it was created and received.

Email Creation

- Reply to emails by including the previous string of communication, do not create a new, unconnected email.
- Create a new email for a new subject or issue (do not use reply to a previous, unrelated email).
- Ensure emails are professional in nature and adequately reflect the intent of the communication.
- All emails sent externally must include the senders full Council signature block.

2. Document history and version control

Documents and records will include version identification and revision history to provide an audit trail and evidence of the authorised or official version. This includes identification of the version communicated or sent to stakeholders in the conduct of business. (Document History and Version Control Procedure)

3. Integrity of Information

The public, under the Freedom of Information Act 1991, may access records, or records may be released to the courts or investigating body, so it is important that a professional approach be taken in relation to record content and file notes.

Comments of a personal or derogatory nature, should not be documented in, or attached to, records. Only write what you are happy to see published and available to the public.

4. Capture into a system

The official records of the Council will be captured into the Content Manager system as soon as practicable after creation or receipt.

To give records context and meaning, and ensure that they are accessible over time, their capture into the Content Manager system is an essential step in the overall management of the records of the Council. Capture of records into the Content Manager system ensures accurate and valid information is able to be accessed when it is required and assigns a unique identifier to ensure the record can be validated. It also protects records from unauthorised alteration or deletion.

It is a record when:

- The information relates to the business processes of the Council.
- It is required to provide evidence to support the business and accountability of Council, including interaction with stakeholders.
- Provides evidence of Council's compliance with legislative and statutory requirements.

- It identifies issues or risk, or possible issues or risk for the Council, or
- It adds value to an existing record.

Ephemeral material does not need to be managed within the Content Manager system. This includes duplicates, other organisation's publications, some working documents, advertising brochures etc. However, if ephemeral material adds value to a record then it can be treated as a record. If in doubt seek advice from the Records Management staff.

5. Duplicates

It is recommended that the creation of duplicates/copies of records is avoided where possible. Where staff create a copy of a record for personal reference, it must be identified as a copy (stamped with a copy stamp) and the management and destruction of that copy is the responsibility of the individual. It is also the responsibility of the individual to refer to the original record to ensure currency of information if referencing a copy to provide advice or make a decision.

All duplicate copies of records will be clearly marked as such to enable identification, suitable management in the future and prevent confusion in relation to the identification of the official, valid original. This also will prevent the need to resource the ongoing maintenance, storage and disposal of duplicates by the Records Management staff and sentencing contractors.

6. Storage

Electronic records will be stored in the Content Manager system. Hard copy source records (those that have been scanned and captured into Content Manager system) will be stored in the records management room. These can be accessed by making a request to the Records Management staff and quoting the document ID.

Legacy paper-based files from previous systems are stored in various storage environments within Council, including at the State Records of South Australia Archives.

All records, irrespective of format, must be stored in an area where they are known to exist, are accessible and are protected from damage or inappropriate access.
All staff should ensure that hard copy files and records are protected whilst in their possession.

The Council's records should not to be stored in environments where they could be lost or damaged, or where there is a possibility of unauthorised access (e.g. at home or in cars).

All records must be stored:

- Away from known hazards, such as heat, water, vermin, dust.
- In an environment that suit their media and format.
- In a location that is secure, accessible and protected.
- Where access and retrieval and are controlled.

7. Updating of Records

Records will be updated to reflect the current status, current activity or events, to ensure the information they contain remains accurate and current. Records containing information about the same issue or event can be associated with each other to provide context and a complete representation of the facts.

A note should be added to a record when an action is undertaken e.g. a response or phone conversation, or further information is provided.

8. Alteration

The alteration of records should not occur after the record is finalised, acted upon, signed or sent to the recipient. If records are captured into the Content Manager system, the drafting of records is managed with revision control by the system.

Any alteration of records must be authorised by the CEO or delegate.
If records are saved to the N drive or hard drives, alteration cannot be controlled and the validity of the record may be questioned if it is required as evidence in court proceedings. For records to be valid they must be inviolate with an audit trail to prove they have not been inappropriately accessed or altered.

9. Migration

To ensure records are protected and are accessible for as long as they are required, they must be migrated to new and enduring formats. Records requiring migration will be identified and monitored by the Records Management staff. The application of authorised disposal schedules (GDS 40) will identify records requiring long term or permanent retention, which may require migration depending on what media and format they are in. The capture of electronic records into the Content Manager system will ensure long term retention records are able to be identified for migration across systems.

10. Access

Records may contain information that is confidential in nature and should not be divulged to certain parties, including some staff within the Council. Staff must be aware of issues relating to confidentiality, privacy and sensitivity when managing, accessing or divulging information either on request from within the Council, or from outside.

Staff must take care when collecting, storing, using and disclosing personal information relating to individuals and the provisions of the Privacy Policy and Freedom of Information Act 1991 must be applied in relation to access to records containing personal information.

External Access
Requests by the public or media for access to information, that is not already publicly available, come under the Freedom of Information Act 1991 and are managed by the Freedom of Information Accredited Officer.

Where documents and records contain:

- Personal information relating to an individual.
- Commercial-in–confidence information relating to the Council or an organisation the Council is conducting business with.
- Working papers relating to a proposed project, or
- Legal opinions.

Clarification must be sought from the relevant manager prior to providing access.

Internal Access

Sensitive and confidential information should be protected to ensure it is not viewed by those who should not have access to it, including staff who are not involved in a particular business activity. Where required, records in all formats should be stored securely to prevent unauthorised access. If they captured into the appropriate container in the Content Manager system, security will ensure the records are protected from unauthorised access.

Security protocols of the Council apply to records at the time of creation, receipt and capture to ensure protection of any confidential, private, sensitive or intellectual property from inappropriate access, usage, disclosure or alteration.

11. Copyright

Staff should be aware of the provisions of the Copyright Act of 1968 which is the legal protection for people who express ideas and information in writing, visual images, music and moving images. The Council owns the copyright to any publication it produces and external parties own the copyright of what they produce.

Permission from the owner of the copyright may be required before any work is reproduced. Copyright generally lasts for the life of the creator plus 70 years and where duration depends on year of publication, it lasts until 70 years after it is first published.

12. Disposal

Under the State Records Act 1997 it is illegal to dispose of records (destroy or remove) except in accordance with an approved records disposal schedule.

General Disposal Schedule 40 (GDS40) or General Disposal Schedule 41 (GDS41) must be applied to the records of the Council when determining how long records should be retained for, or when they can be destroyed.

GDS40 and GDS41 identifies the retention periods for records based on an appraisal of the records value including their cultural, historical, fiscal, business, social and legal value. Other schedules, such as GDS 32, GDS 16, that add a further layer of retention, may also need to be applied.

Records are either temporary (can be destroyed when their retention period has expired) or permanent (must be transferred to State Records of SA 15 years after creation or when administrative use ceases).

Inactive temporary records should be stored in an appropriate storage environment onsite. Prior to the destruction of temporary value records, (where the retention period has elapsed) approval must be given by the Chief Executive Officer, the Authoriser of destruction.

All documentation relating to the disposal process must be maintained to validate the legal disposal of records if required. This validation may be required for a Freedom of Information Act 1991 application or for legal discovery.

Information resources that are not considered to be records and have no ongoing value to the Council (ephemeral material) may be destroyed without applying the disposal schedule or seeking approval.

Care must be taken not to destroy information which has value to the Council, which may result in legal action, embarrassment, or penalties, to the individual or Council.

If there is any doubt about what material can be destroyed contact Records Management staff. Under the State Records Act 1997 section 17, the **intentional illegal destruction, damage, alteration or removal of official records** could incur penalties of **$10,000 or 2 years imprisonment of the individual responsible**. Further penalties may be applied.

Documents that contain confidential, personal or sensitive information should not be placed in open bins, but either shredded or placed in confidential waste bins when they are being destroyed.

F. Glossary of Terms

Term	Definition
Access	The right, opportunity, means of finding, using, or retrieving information. [AS ISO 15489.1 – 2002]
Capture	Deliberate action that results in the registration of a record into a recordkeeping system. For certain business activities, this action may be designed into electronic systems so that the capture of records is concurrent with the creation of records.
Classification	Systematic identification and arrangement of business activities and / or records into categories according to logically structured conventions, methods, and procedural rules represented in a classification system. [AS ISO 15489.1 – 2002] – Council Classification Scheme
Destruction	Process of eliminating or deleting records, beyond any possible reconstruction.
Disposal	Range of processes associated with implementing appraisal decisions. These include the retention, deletion or destruction of records in or from recordkeeping systems and the transfer of custody of ownership of records.
Disposal Schedule General (GDS)	Formal instrument that defines the retention periods and consequent disposal actions authorised for classes of records that are common to agencies of Government
EDRMS	Electronic Document and Records Management System - An automated system used to manage the creation, use, management and disposal of physical and electronically created records (Content Manager).

Term	Definition
Ephemeral	This is transient material that contains information of little corporate value such as advertising material duplicates and other organisations publications.
Council	District Council of Loxton Waikerie
Council staff	Includes persons employed by the Council, volunteers, trainees, work experience placements, independent consultants and contractors and other authorised personnel who access the Council's information resources as part of their role.
Record	Information created, received, and maintained as evidence and information by an organisation or person, in pursuance of legal obligations or in the transaction of business. [AS ISO 15489.1 – 2002]
Records Management	The discipline and organisational function of managing records to meet operational business needs, accountability requirements and community expectations. [AS ISO 15849.1 – 2002]
Recordkeeping	Making and maintaining complete, accurate and reliable evidence of business transactions in the form of recorded information.
Recordkeeping System	Information system that captures, manages and provides access to records through time.
Source Records	A document or record that has been copied, (digitised) converted or migrated or will be the input for such a process. A source record may be an original record or it may be a reproduction that was generated by an earlier copying, conversion or migration process.
Stakeholder	Resident, ratepayer, client, customer, member of the public, organisations, government entities or employee/s within the organisation who conducts business with or on behalf of the Council.

G. Availability

This Policy will be available for inspection at the Council Offices at Loxton or Waikerie during ordinary business hours at no charge.

Copies of this Policy will also be available from Councils website: www.loxtonwaikerie.sa.gov.au or postal copies may be obtained from the Council Office free of charge.

This policy will be available in Council's Electronic Document Management System (Content Manager).

H. Document history and version control

Date	Version	Authorisation	Amendment Details
19/05/2006	1.0	Council meeting of 19 May 2006	First version
17/07/2009	1.1	Council meeting of 17 July 2009	Review period changed to that of every 2 years
16/11/2012	1.1	Council meeting of 16 November 2012	No changes noted
17/04/2015	1.1	Council meeting of 17 April 2015	No changes noted
23/10/2017	1.2	Senior Management Team meeting, 23 October 2017	Noted title changes and the addition of document history and version control.
04/02/2019	1.3	Senior Management Meeting 4 February 2019	Proposed changes reflect the implementation of CM9
29/11/2021	1.4	Senior Management Meeting 29 November 2021	Minor updates to outdated GDS and other references. Updated to fit new council policy template
18/03/2024	1.5	Senior Management Meeting 18/3/24	Minor updates, added to new council policy template.
16/03/2026	1.6	Senior Management Team Meeting	Minor updates to outdated document references