RECORDS MANAGEMENT POLICY

The IPC is an agency of less than 30 people with limited administrative resources who, without dedicated records staff, create and manage their own physical and electronic files.

The IPC's records are its corporate memory, providing evidence of actions and decisions, while representing a vital asset in supporting daily functions and operations. They support policy formulation and managerial decision-making, they protect the interests of the organisation and of the Government as well as the rights of employees, clients and citizens and help in the delivery of our services in a consistent and equitable way.

The IPC is committed to meeting its responsibilities under the *State Records Act 1998* and to implementing Policies and Standards in its records management processes and systems.

Essential Summary

The purpose of the Records Management Policy is to ensure that full and accurate records of all activities and decisions of the IPC are created, managed and retained, or disposed of appropriately, and in accordance with relevant legislation.

A Records Management Program has been established in accordance with s. 12(2) of the *State Records Act 1998.* This policy provides the framework and outlines responsibilities for the operation of the IPC's Records Management Program.

The IPC has a service level agreement (SLA) with DAGJ for the provision of shared corporate services, including records management.

All staff, including contractors and consultants, must comply with this policy and associated records management procedures in their conduct of official business for the IPC. This policy applies to records in all formats, including electronic records.

The Executive Director is responsible for managing the Records Management Program.

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1　Scope

All IPC staff, including contractors and consultants, must comply with this policy and associated records management procedures iin their conduct of official business for the IPC. This policy applies to records in all formats, including electronic records.

2　Purpose

The purpose of the Records Management Policy is to ensure that full and accurate records of all activities and decisions of the IPC are created, managed and retained or disposed of appropriately, and in accordance with relevant legislation.

This will enable the IPC to achieve information accessibility, business enhancement and improvement. It will also meet its obligations for accountability while ensuring that it protects the rights and interests of the Government, the organisation, its staff, clients and the community.

A Record Management Program has been established by the IPC in accordance with s. 12(2) of the *State Records Act 1998.* This policy provides a framework and outlines responsibilities for the operation of the IPC's Records Management Program.

The IPC has adopted DAGJ's Records Management Policy and supporting procedures and guidelines.

3　Policy requirements

- Creation and capture
    - All records created at the IPC will be created in the Electronic Document & Records Management System (EDRMS).
- Classification
    - All records captured in the EDRMS are titled according to the IPC Business Classification System (BCS). This BCS is embedded into the EDRMS and all files registered have at least two levels of Classification (Keyword and Subject).
- Security Classification
    - All files created in the EDRMS assume the level of Unclassified. Application of more severe security classifications can be made where required, including Protected, Confidential, Secret and Top Secret.
- Access/security
    - All records registered in the EDRMS are only viewable to IPC Staff and Corporate Records. Further restriction of access where required is managed using Access Controls in the EDRMS when a record is registered.
    - Hard Copy case records are physically secured in lockable storage housings.
- Handling
    - All records and documents are to have a Dissemination Limiting Marker applied. This is a mandatory field in the EDRMS. The options include None, For Official Use Only (FOUO), Sensitive, Sensitive Personal, Sensitive: Legal, Sensitive: Cabinet, Sensitive: NSW Cabinet, Sensitive: NSW Government, Sensitive: Law Enforcement, Sensitive: Health Information.

- Storage
    - All corporate files are to be stored in the EDRMS in electronic format only; where hard copy documents are used for ephemeral purposes they are to be stored in secure storage housings until such time as they are securely disposed of.
    - Hard copy case records are to be stored in secure storage housings. All records are to be secured at all times.
- Disposal
    - All records will be disposed of in accordance with NSW State Archives & Records General Disposal Authorities and the IPC Functional Disposal Authority.
    - Records can only be disposed of in accordance with the relevant disposal authority and with the approval of the CEO.
- External parties
    - All staff, including contractors and consultants, must comply with this policy and associated records management procedures in their conduct of official business for the IPC. This policy applies to records in all formats, iincluding electronic records.
- Compliance monitoring
    - The Director Business Improvement and Director Investigation and Review, are responsible for assuring compliance with the IPC Records Management Policy, and Records Management Program.

4 Records Management Program

A Records Management Program is a planned, coordinated set of policies, procedures, people, systems and activities that are required to manage records. All public sector agencies, including local councils and universities, are required to have a Records Management Program in place to meet their regulatory obligations under the *State Records Act 1998.*

The IPC's Records Management Program seeks to ensure that:

- it has the records it needs to support and enhance ongoing business and customer service, meet accountability requirements and community expectations

- these records are managed efficiently and can be easily accessed and used for as long as they are required

- records are stored as cost-effectively as possible and when no longer required they are disposed of in a timely and efficient manner

- the IPC complies with all requirements concerning records and records management practices including the NSW Government's objectives for recordkeeping records of longer term value are identified and protected for historical and other research.

The IPC iis committed, through its Records Management Program, to maintaining digital and other technology dependent records in an authentic and accessible form for as long as they are required in accordance with s. 14 of the *State Records Act 1998.*

The IPC also has a service level agreement (SLA) with DAGJ for the provision of shared corporate services, including records management. Within the terms of the SLA, DAGJ is responsible for providing an electronic document and records management system (EDRMS) and off-site storage for IPC records and archives.

The Director Business Improvement and Director Investigation and Reporting are jointly responsible for managing the Records Management Program.

5 Recordkeeping responsibilities

All IPC staff have specific responsibilities in managing the records created by the organisation.

Information Commissioner and CEO

The Information Commissioner and CEO ensure that the IPC complies with the requirements of the *State Records Act 1998* and the standards and requirements issued under the Act. This includes the requirement for the public office to ensure that any records requiring technology to be read and understood remain readable and available for as long as they are required (section 14).

Directors (NSO)

Nominated Senior Officer (NSO) for records management at the IPC is held jointly by the Director Business Improvement and Director Investigation and Review. The NSO has ownership of the Records Management Policy and represents records management interests on the Executive. The NSO also reports to the State Records Authority on the Records Management Program, e.g. responds to records management surveys and ensures that the Records Management Program is adequately resourced.

Information Services Officer

The Information Services Officer develops strategic and operational plans for the Records Management Program and ensures that all staff are aware of their record keeping responsibilities. This includes monitoring compliance with the Records Management Policy, procedures and standards across the IPC, making recommendations for improving or modifying practices and liaising and giving reports to the IPC's service level provider.

The Senior Information Management Officer also formulates and maintains a keyword thesaurus; retention and disposal authorities; vital records lists and disaster management plans; coordinates a records management training program; and, ensures that contracts with service providers contain records management clauses in accordance with this Records Management Policy.

Data Projects and System Support Officer

The Data Projects and System Support Officer maintains the day-to-day record keeping operations and ensures that IPC files are registered and tracked in the organisation's record keeping systems.

Managers and Supervisors

Managers and supervisors ensure that records are created and managed within their business unit in a way which complies with the Records Management Policy and procedures, and ensures that all staff are trained in how to create and manage records.

Staff

All staff must comply with the Records Management Policy and Procedures. Staff must create full and accurate records of their business activities, including records of all decisions and actions made in the course of their official business and ensure that all records are saved into the organisation's record keeping systems.

Contractors and Consultants

Contractors and consultants manage records that they create on behalf of the IPC according to the terms of their contract.

6 References

- [Australian Government Security Classification System](#)
- NSW Government Information Classification, Labeling and Handling Guidelines
- State *Records Act 1998*
- [Standard on Managing a Records Management Program](#)
- The International Standard on Records Management is ISO 15489. This standard has been adopted by Standards Australia and supersedes Australian Standard on Records Management AS4390
- Records Management Policy, NSW State Records
- Records Management Policy, NSW Department of Attorney General and Justice
- *Government Information (Public Access) Act 2009* (GIPA Act)
- *Government Information (Information Commissioner) Act 2009* (GIIC Act)
- *Privacy and Persona/Information Protection Act 1998* (PPIP Act)
- *Health Records and Information Privacy Act 2002* (HRIP Act)

Acknowledgments

The IPC acknowledges the use of Records Management Policy documents provided by State Records NSW and the State Library of NSW.