

# Records and Information Management Policy



Policy No:	PD/67	Record No:	56468
Version:	1.0	Last Amendment:	
Policy owner/sponsor:	Director, Digital Experience Division, and CIO		
Branch contact:	Business Information Leader		
Approved by:	State Library Executive		
Date approved:	27 March 2018		
Next review:	March 2020		

## Summary

This policy supports Library staff to create, capture, and make available accurate, reliable data and information to drive decision making and effective services, and maintain compliance with the *State Records Act 1998*.

## Policy Statement

The purpose of this policy is to ensure the Library has accurate, reliable, and useable records which

- provide transparent evidence of decisions and transactions,
- support business activities, policy and strategy formulation, and
- guarantee that the Library meets compliance requirements and community expectations.

All records provide evidence of the business of the Library and are State Records.

The State Library's records are a vital asset, essential for ongoing operations, and underpin government transparency and trust.

## Scope

This policy applies to the management of all Library records and associated metadata from the time of creation and capture to disposal.

Records can be in any format, including electronic or hard copy, textual, graphical or audio-visual.

Records created by external service providers on behalf of the Library which contain evidence of Library business fall within the scope of this policy.

## Target audience

All staff are responsible for keeping records as defined in this policy.

## Operational requirements

### 1. Creation, capture, and storage of Library Records

All records must be accurately and reliably registered in the Library's Records Management System or stored in a Library approved business system that contains functionally specific business records, for example finance records. The Chief Information Officer is responsible for the approval of systems for the storage and management of records. Examples of records include documentary evidence of actions, events, communications, decisions, approvals, service provision, collection management, and legal, financial and contractual commitments, or other significant information that adds value to library decision making or compliance.

A business record registered in the Records Management System will be considered the source of truth. Drafts that document significant decisions, reasons and actions, or contain other significant information must also be managed in the Library's Records Management System.

Records created in the following locations must be managed using the Library's record keeping system:

- hard copy files
- network file shares
- cloud based platforms such as Sharepoint
- social media channels
- email folders
- computer hard drives
- external hard drives
- personal drives including OneDrive,
- telephone and messaging.

Ephemeral information, which is of no continuing value to the Library and only needed for a few hours or a few days, and facilitative information, which means records of little value or of a routine instructional nature that is used to progress some activity, may be deleted under Normal Administrative Practice as defined in Schedule 2 of the *State Records Regulation 2015*.

The Library will implement systems and procedures that support the management of document records in digital formats, and these formats will be incorporated into business processes in preference to hard copy records.

All records must be classified using the Library's Business Classification Scheme. Consistent classification of records aids discoverability, enables collaboration and decision making, and informs disposal actions.

Storage of all work-related records should be in conditions appropriate to their format and use to prevent their unauthorised access, use, alteration, disclosure, destruction or removal. Hardcopy records must be stored in accordance with the *Standard on the physical storage of State records*. Storage areas and facilities must be authorised for use by the Senior Responsible Officer. Hardcopy records should be handled with care to avoid accidental damage or loss and returned to their appropriate place of storage when not in use.

## **2. Management of, and access to Records**

Staff have access to all records unless there are explicit restrictions in place, such as for reasons of privacy, commercial confidentiality, or legal liability.

Access to the Library's records by external parties is governed by the *Government Information (Public Access) Act 2009*, and the *Privacy and Personal Information Protection Act 1998*. Access to records over 30 years old may also be permitted under the provisions of the *State Records Act 1998*.

Staff must seek advice from Privacy Contact Officer before responding to requests for information from an external party as part of a subpoena or legal warrant.

All records must be managed in ways that mitigate risks to the confidentiality, integrity and availability of information contained within them.

Access to hardcopy files is managed by the Business Information Team. Staff are responsible for the files assigned to them. Movements of hardcopy files between staff must be registered in the Library's record keeping system in accordance with Business Information procedures.

The physical security and integrity of files is the responsibility of all staff. Hardcopy files must be handled in a manner consistent with guidelines outlined in *Collection Care (2016) Techniques for handling special collection items for clients and staff*.

Records that have a Dissemination Limiting Marker applied, for example files containing personal or health information, must be stored according to the handling guidelines published in *NSW Government Information Classification, Labelling and Handling Guidelines, 2015*.

## **3. Information Security**

All records created by the Library are covered by the *NSW Government Digital Information Security Policy*. Information contained in records must be managed in accordance with related procedures and guidelines. Records must be classified, labelled and handled in accordance with the *NSW Government Information Classification, Labelling and Handling Guidelines* and related policies.

## **4. Monitoring and Review**

To ensure compliance with this policy and legislative requirements, the Library will monitor record-keeping. The Library will liaise with NSW State Archives and Records Authority as required on compliance-related issues.

The Business Information Team will undertake regular assessments of business unit performance against the records management policy and any supporting procedures or guidelines.

Non-compliance with this records management policy may result in action under the *Code of Ethics and Conduct*, or legal proceedings under relevant legislation.

## 5. Disposal of Records

Records must be protected, maintained, discoverable, and useable for their entire retention period.

Records must only be disposed of in accordance with authorised retention and disposal authorities and the Library's record management procedures.

Only authorised, delegated staff members may approve, undertake or arrange for the destruction of records. Records will not be disposed of without the approval of the relevant branch manager and the Business Information Leader.

The exception is for some drafts, duplicates, rough working documents and unsolicited promotional material which may be destroyed under the Normal Administrative Practice (NAP) provision of the *State Records Act 1998* and *State Records Regulation 2015*.

Records authorised for destruction must be destroyed by secure means such as shredding or using secure destruction bins.

Records required to be kept as State Archives as defined in the retention disposal authority, excluding the series known as the Mitchell Files, will be routinely transferred to the State Archives and Records Authority when the record is no longer in use. The Mitchell Files will be kept on site.

Records must be retained, even if the minimum period specified in a retention and disposal authority has been met, if the records are:

- reasonably likely to be required for a pending or anticipated investigation, inquiry or legal proceeding; and those
- relating to an access request submitted under legislation such as the *Government Information (Public Access) Act 2009 (NSW) (GIPA)* or the *Privacy and Personnel Information Protection Act 1998 (NSW) (PIIPA)*.

## Responsibilities

*The NSW State Librarian* is responsible for:

- ensuring the Library complies with the *State Records Act 1998*, as outlined in Section 10, including its conformity to legislative and other compliance requirements.

*The Director, Digital Experience and CIO* serves as Senior Responsible Officer as defined by the State Archives and Records Authority, responsible for:

- oversight of records and information across the Library as per the requirement in the *Standard on records management*,
- leading the implementation of this policy and issuing procedures and reporting non-compliance with these procedures to the Executive,
- representing records management interests on the Executive,
- approving official registers,
- providing support and resources to maintain a fully operational Records Management Program in accordance with the *State Records Act 1998*,

- providing infrastructure and support to ensure that records are managed so that they are accessible, readable, inviolate, authentic, comprehensive and complete, for their entire retention period as outlined in the relevant Disposal Authorities,
- ensures all records remain accurate, reliable, complete and authentic throughout systems lifecycle changes, including implementation, migration, testing, auditing and decommissioning.
- ensuring that information management policies and projects address records management implications and obligations.

*Directors, managers and supervisors* are responsible for:

- managing processes relevant to this policy and communicating this policy to staff,
- monitoring and, where necessary, enforcing the policy and procedures,
- promoting a culture of records and information management practice within their business area,
- identifying vital, high value/high risk, or key records in their business unit and assisting in planning for disaster recovery and business continuity,
- participating in planning and managing projects to sentence legacy records and reduce hardcopy files,
- in conjunction with the Business Information Leader, authorising the destruction of records on an annual basis,
- consulting with the Business Information Leader when introducing new activities and systems to ensure that records are captured, and that relevant terms exist in the Business Classification Scheme,
- assessing legislative requirements for records relating to their specific activities,
- taking reasonable measures to ensure that State Library records created by third parties engaged to perform work on behalf of the Library are managed in accordance with this policy and related procedures,
- ensuring that records management operations within their areas are adequately resourced,
- ensuring trained staff are available to create and manage records.

*Staff* are responsible for:

- complying with this policy and related procedures,
- ensure that records are saved in to the appropriate system, made accessible, protected from unauthorised access, and only destroyed according to procedures,
- keeping full and accurate records of substantive State Library activities, transactions and decisions which may be carried out by staff, contingent workers, or contractors.

The *Business Information team* is responsible for:

- drafting, reviewing and updating this policy and related procedures,
- providing training, support and advice in implementing the policy and procedures,
- developing corporate standards in relation to all aspects of records management, and monitoring compliance with those standards throughout the Library,
- designing and maintaining record keeping systems and standard procedures,
- ensuring that all staff are aware of their records management responsibilities,
- developing and overseeing the records management training program,
- developing records management related strategic and operational plans,

- formulating and maintaining the Business Classification Scheme and Functional Disposal Authority.

The *Business Information Leader* is responsible for:

- evaluating local procedures, including official registers,
- auditing local procedures,
- authorising the disposal of records, along with the relevant managers,
- liaising with State Archives and Records to enable them to monitor the Library's records management program
- ensures that systems which hold high risk and/or high value records and information are identified and protected by business continuity strategies and plans, and
- assessing and processing information requests under GIPA and privacy legislation.

### **Related Key Legislation and Policy**

The following is a list of legislation and government directions relevant to record keeping and must be complied with:

- [State Records Act 1998](#) – including *Standards and Disposal Authorities issued under the Act*
- *State Records Regulation 2015*
- [Government Information \(Public Access\) Act 2009](#)
- [Privacy and Personal Information Protection Act 1998](#)
- [Health Records and Information Privacy Act 2002](#)
- [Evidence Act 1995](#)
- [Public Finance and Audit Act 1983](#)
- [Government Sector Employment Act 2013](#)
- [Electronic Transactions Act 2000](#)
- [Commonwealth Copyright Act 1968](#)
- [Charitable Fundraising Act 1991](#)
- [State Records Regulation 2015](#).
- State Records Authority of New South Wales [Functional Retention and Disposal Authority: FA237](#)
- [NSW Public Sector Code of Conduct](#)
- [NSW Government Digital Information Security Policy, 2015](#)
- [NSW Government Information Classification, Labelling and Handling Guidelines, 2015](#)
- NSW Treasurer's Directions
- *Good conduct and administrative practice: guidelines for state and local government (issued 2017 by NSW Ombudsman)*

Related and/or most relevant State Library and government policies

- *Code of Ethics and Conduct*
- *Information Security Policy*
- *Policy on the use of Technology*
- *Privacy Management Policy*
- *Procurement Policy*
- *Social Media Policy*

- [NSW Government Digital Information Security Policy 2015](#)

This policy supersedes the State Library of NSW *Records Management Policy 2001*.

## Glossary

### **Business Information**

As information management is a service, function and activity undertaken by the Library, the term Business Information distinguishes information used in the management of the Library from information within the collections.

### **Destruction**

Destruction is the complete and irreversible physical erasure of the record which ensures that the record cannot be reconstituted or reconstructed.

### **Disposal**

A range of processes associated with implementing appraisal decisions. These include the retention, deletion or destruction of records in or from recordkeeping systems. They may also include the migration or transmission of records between recordkeeping systems, and the transfer of custody or ownership of records. (AS 4390 Part 1 Clause 4.9)

### **Dissemination Limiting Marker or DLM**

A label and classification attached to a record which indicates a level of clearance required for access to the information contained in it. These correspond with classifications contained in the *NSW Government Classification, Labelling and Handling Guidelines, July 2015*.

### **Document**

A piece of written, printed, or electronic matter that provides information or evidence or that serves as an official record.

### **File or Folder**

A container which has within it records in either digital or physical format, and metadata attached to it providing information used for managing the records.

### **Record or Business Record**

Information created, received, and maintained as evidence and information by an organisation or person, in the pursuance of legal obligations or in the transaction of business.”- (ISO 15489-1:2016, *Information and documentation - Records management, “Concepts and Principles”*.)

### **Records Management System**

A software application designed to facilitate the creation, management, access, storage and disposal of a range of both hardcopy and digital documents and records in an integrated way.

### **Register**

*Verb:* The act of committing information about a record into a system designed for managing records.

*Noun:* A system designed for managing records, including historic hard copy systems, the Library’s official records management system, and business systems containing functionally specific records.

**Retention and disposal authority**

A retention and disposal authority is a formal instrument that identifies the various types or categories of records maintained by a public office, how long they have to be retained and whether they can eventually be destroyed or retained as State archives.

**Source of truth**

Where multiple versions of a document or record exist and there is a need to identify a single authoritative version, versions registered in the record keeping system provide the source of truth.

**State archive**

A State record that the State Records Authority of New South Wales has control of under the *State Records Act, 1998*. (section 3, State Records Act).

**State records**

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. (section 3, State Records Act).

**Document history and version control**

<b>Version</b>	<b>Date approved</b>	<b>Approved by</b>	<b>Brief description</b>
1.0	27 March 2017	State Library Executive	New Policy