

POL-INM-002 **Information Management Policy**

Corporate Services

POLICY OBJECTIVE

The objective of this policy is to establish a consistent framework for the creation, management, storage, and disposal of physical and digital records and information within Edward River Council, ensuring compliance with legislative requirements, supporting transparency, accountability, and efficient operations.

This policy aims to ensure that all records and information, regardless of format, are managed securely and remain accessible for their required retention period.

SCOPE

This policy applies to all council staff, contractors, and third-party providers handling council records and information. It covers the management of both physical and digital information and records created, received, or maintained by Edward River Council. These include records from operational, administrative, and governance activities, encompassing all platforms used for information storage.

This policy covers:

- Physical Records: Hard-copy documents, files, and physical storage mediums.
- Digital Records: Emails, documents, databases, and other forms of electronically stored information.

COMPLIANCE REQUIREMENTS

Edward River Council must comply with a variety of legislative, regulatory, and standards based requirements to ensure that information management practices meet legal and operational obligations. Failure to comply with these requirements can result in penalties, legal liability, operational inefficiency, and reputational damage.

The key compliance requirements for records management at the Edward River Council include:

Legislation	Regulations	Codes, Plans or Strategies
State Records Act 1998 (NSW)	General Retention and Disposal	Information Management
	Authority (GDA) for Local	Framework
	Government Records	
Government Information (Public		Government Information (Public
Access) Act 2009 (GIPA Act)		Access) Act 2009 (GIPA Act)
		Operational Procedure
Privacy and Personal Information		Normal Administrative Practice
Protection Act 1998 (PPIP Act)		Operational Procedure
Environmental Planning and		
Assessment Act 1979 (NSW)		
Electronic Transactions Act 2000		
(NSW)		

POLICY STATEMENT

Edward River Council is committed to maintaining accurate and complete records in both physical and digital formats. These records must be maintained in a manner that ensures their integrity, security,

Page 1 of 5 Document Set ID: 363145



POL-INM-002 **Information Management Policy**

Corporate Services

accessibility, and compliance with legal requirements. All records are considered assets of the council and must be managed according to approved practices that ensure preservation, ease of retrieval, and timely disposal when no longer required.

Records will be captured and stored in appropriate systems such as TechnologyOne CI Anywhere, SharePoint, Network Drives and in physical storage areas according to their classification and retention schedules.

ROLES AND DELEGATED AUTHORITY

Effective information management within Edward River Council requires clear delegation of responsibilities across all levels of the organisation. Every individual involved in council operations, from executives to front-line staff and contractors, has specific roles in ensuring the integrity, accessibility, and security of council records, whether physical or digital.

Council Directors and Executives

- Approves this policy and oversees its implementation across all departments.
- Provide the strategic direction and resources needed for the development and implementation of a comprehensive records management framework.
- Ensure that records management is integrated into broader governance and risk management strategies.
- Promote a culture of accountability and compliance in relation to information management across the council.

Information Management (Records) Team

- Develop, implement, and maintain records management policies, procedures, and systems in alignment with legislation, standards, and council needs.
- Ensure that all records, both physical and digital, are captured, classified, stored, retrieved, and disposed of correctly, according to retention and disposal schedules.
- Conduct regular audits and assessments to ensure compliance with legal and regulatory obligations.
- Provide training, support, and guidance to staff to ensure they are aware of their recordkeeping responsibilities.
- Maintain records storage facilities (both physical and electronic) to ensure records are secure, organised, and accessible.
- Manage access control and ensure the security of records, protecting them from unauthorized access or breaches.
- Serve as the primary liaison with external bodies, including regulators such as the NSW State Archives and Records Authority, for matters related to recordkeeping compliance.
- Monitor technological developments in records management and recommend system updates or new solutions to support efficient recordkeeping.

Leadership Team

- Ensure that records management policies and procedures are adhered to within their respective departments.
- Assign staff responsibilities for records management and ensure they are adequately trained in the creation, maintenance, and disposal of records.
- Oversee the proper classification, storage, and disposal of records in their areas, ensuring that all relevant records are captured and maintained in accordance with the policy.

Page 2 of 5 Document Set ID: 363145

Version: 0, Version Date: 01/01/1900



POL-INM-002 **Information Management Policy**

Corporate Services

- Ensure timely retrieval of records for internal or external audits, legal matters, or public access requests under the Government Information (Public Access) Act 2009 (GIPA Act).
- Report any records management issues (e.g., lost or damaged records, security breaches) to the Information Management Unit.
- Support the integration of records management into the daily operations of the department, ensuring it is viewed as a core component of business processes.

Employees, Contractors, Volunteers and Councillors

- Capture and manage records (both physical and digital) in accordance with the Records Management Policy and relevant procedures. This includes ensuring that all records created, received, or maintained are accurate, complete, and filed correctly in approved systems such as TechnologyOne CI Anywhere, SharePoint, or physical filing cabinets.
- Protect the integrity, confidentiality, and security of council records by following approved procedures for accessing, sharing, or transferring records.
- Adhere to retention schedules, ensuring that records are retained for the appropriate period and are disposed of only with proper authorization.
- Report any irregularities or breaches in records management (e.g., accidental loss, unauthorised access) to their supervisors or the Information Management Unit.
- Participate in training or briefings related to records management, ensuring they remain up to date on their responsibilities and any changes to policies or systems.

RISK ASSESSMENT

Risks associated with information management, particularly in relation to non-compliance or mishandling of records, include:

Diek	Initial			Controls		Residual			
Risk	L	С	R	Controls		С	R		
Legal Non-compliance	С	Sev	High	Clear and defined policies that are well communicated and staff trained, continuously monitor changes to relevant legislation and regulations	R	Mod	Low		
Data Breaches	С	Sev	High	Implement document access control, encrypt sensitive data and cyber security back up systems	R	Mod	Low		
Loss of critical information Business Continuity	Р	Sev	High	Develop and maintain a disaster recovery plan	R	Sev	Medium		

(L=Likelihood, C=Consequence, R=Risk)

ASSOCIATED DOCUMENTS

Framework/Strategy/Code/Plan/Policy	Procedure
Information Management Framework	Government Information (Public Access) Act Procedure

Page 3 of 5 Document Set ID: 363145



POL-INM-002 Information Management Policy Corporate Services

Information Management Digitisation Plan	Normal Administrative Practice Procedure				

DEFINITIONS AND ACRONYMS

Term	Definition
Records	Information created, received, and maintained by the council in the
	course of its activities.
Digital Records	Any record created, maintained, and accessed in electronic formats,
	including emails, digital documents, and databases.
Physical Records	Hard-copy or paper-based records.
GDA	General Retention and Disposal Authority – guidelines for retention and disposal of local government records in NSW.
Meta data	Law made by Parliament (Acts and Regulations) that provide a legal framework and impose requirements. Key legislation applicable to Council includes: - Local Government Act 1993 - Local Government (General) Regulation 2021 Some legislation requires public authorities like Council to create local
	policy to ensure compliance with statutory obligations
Risk Assessment	L = Likelihood – How likely it is to occur C = Consequence – Impact if it were to occur R = Risk – Scale of risk ranked from Likelihood and Consequence Extreme – Immediate action required, Leader & EMT must be made aware High – Senior Management attention needed and treatments required Medium – Manage risk at functional/service level Low – Manage exposure through routine procedures
Retention Period	The length of time a record must be kept before it is eligible for disposal.
Disposal	The process of deleting or destroying records when they are no longer required, following proper authorisation.
SCADA System	Supervisory Control and Data Acquisition – a system used for monitoring and controlling infrastructure.
SharePoint	A Microsoft-based platform used for document management and storage.

SUPPORTING DOCUMENTATION

Document Reference	Document Description
Information and Privacy Commission New	Information and Privacy
South Wales	Commission NSW
GA39 Local government records July 2022	NSW Local Government General Retention and Disposal
	Authority
State Records NSW State Records NSW	State Records NSW - management advice, standards,
	policies and tools

Document Set ID: 363145 Version: 0, Version Date: 01/01/1900



POL-INM-002 Information Management Policy Corporate Services

POLICY DOCUMENT CONTROL TABLE

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Policy # POL-INN			/I-000	Policy Title	Information Management Policy					
Policy Ow	ner	Informa	tion Manage	on Management (Records) Officer						
Policy Type Operation		onal		Approval Type Execut		rive Management Team				
	Version Control									
Varsian	Modified by				Date mo		dified,	Council		
Version		•	Modifications made			approved or		Minute	Status	
Number	(position)					adopted		Number		
1	Inform	Information Draft of Information		25/10/2024			Draft			
	Management		Manageme	nt Policy						
(Records) Officer			,							
		•								
1.1		Approved EMT			Approved		23/06/25	Approved		
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									item.	
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Document Set ID: 363145 Version: 0, Version Date: 01/01/1900