

Records Management Policy

1. PURPOSE AND CONTEXT

This policy establishes the operating framework for the Victorian Institute of Teaching (VIT), to meet its legislative obligations for public recordkeeping. VIT is responsible for making and keeping full and accurate public records of its business activities.

The Records Management Framework is encapsulated in this policy and includes procedures and associated business rules.

VIT recognises its regulatory requirements for public records, as a Victorian Government agency, and is committed to the principles and practices prescribed by the Public Record Office Victoria (PROV) and the Australian Standard for Records Management (AS ISO 15489:2016).

2. SCOPE

This policy applies to all staff including Council/Committee members, contractors, and outsourced service providers of VIT. It applies to all records created and/or received in the conduct of VIT's business, in any format and from any source. Examples include paper, electronic messages, digital documents, video, DVD, web-based content, forms and applications.

This policy does not apply to public domain material or data held within business systems such as VIT's core business applications, e.g. NEXUS and TechnologyOne Finance and Payroll. However, it does apply to documentary inputs to and outputs from those applications and systems.

3. DEFINITIONS

TERM	DEFINITION
Converted Record	The copy of the record resulting from the conversion process (compare with source record). For example, the digitised copy of a paper record.
Digitising / Digitisation	The process of converting a physical record to a digital representation.
Keeper of Public Records	The Keeper is the Director of Public Record Office Victoria. The Keeper is responsible for the establishment of Standards for the efficient management of public records and for assisting agencies to apply those Standards to records under their control. (Source: PROS 10/13, Disposal, p.5)
Legacy records	Records stored electronically or physically in a previous system that supports VIT's core business, decision making and processes, e.g. NEXUS.
Pre-action Plan (Conversion)	A conversion activity in which source records are converted before they have been actioned by an officer of an agency. For example, the digitisation of paper records as they are opened in the mailroom (compare to post-action conversion). The key characteristic is that pre-action conversion means that agency staff including Council/Committee members and contractors use the converted records in carrying out the business of the agency.
Post-action Plan (Conversion)	A conversion activity in which source records are converted after they have been actioned by an officer of an agency. For example, back-file conversion of existing paper records – also known as back scanning (compare to pre-action conversion). The key characteristic is that post-action conversion involves converting the records that were used by the agency staff including Council/Committee members and contractors in carrying out the business of the agency, after they have been used.
PROV	Public Records Office of Victoria, the Victorian Government archives, responsible for setting recordkeeping and archival standards.

TERM	DEFINITION
Recordkeeping	Recordkeeping systems are information systems that are used to capture, manage, maintain and provide access to records over time. (Source: AS/NZ ISO 30300:2012 Information and documentation – Management systems for records – Fundamentals and vocabulary 3.4.3)
Records	Information created, received and maintained as evidence and as an asset by an organisation or person in pursuit of legal obligations or in the transaction of business (Source: ISO 15489:2016 Information and documentation - Records management - Part 1 Concepts and principles)
Records Management	The control and direction of information recorded on any physical or electronic medium, which is created or received by an organisation as it carries out its business. The purpose of records management is to ensure the efficient and economical use of an information resource, together with compliance with the Public Records Act 1973 (Vic) as well as public office and PROV policies, standards, advices and guidelines.
Records System	An information system which captures, manages and provides access to records over time (Source: AS/NZ ISO 30300:2012 Information and documentation – Management systems for records – Fundamentals and vocabulary 3.4.4)
Retention & Disposal Authority	A Standard issued by the Keeper under section 12 of the Act that defines the minimum retention periods and consequent disposal action authorised for classes of records which are described in it. (Source: PROS 10/13, Disposal, p.9)
Secondary Storage Facility	An external, commercial storage facility used exclusively for the storage of records. Such facilities are approved by the PROV and are appointed as a place of deposit for the safe keeping and preservation of public records under the provisions of Section 14 of the <i>Public Records Act 1973</i> .
Source Record	The copy of the record that is being converted into another format (compare with converted record). For example, the paper record that is being digitised. This is usually hardcopy.
Transport or Handling	To physically move records (whether on paper, or on mobile digital devices and electronic storage device such as a laptop computer, smartphone, USB/thumb drive or a disk) from one location to another, by any means including by foot, motor vehicle including courier, airplane or other means of transportation. For example: moving a record from our business systems or premises to another, or from the office to home.

4. STATEMENT OF POLICY

The efficient management of VIT's records is necessary to support its core functions, comply with its legal and regulatory obligations and contribute to the effective overall management of the organisation. Records provide VIT with a corporate memory, which enhances decision-making, improves our ability to engage with our stakeholders, and mitigates risk. Records maintain evidence of actions and decisions, and safeguard the legal rights of our stakeholders and the VIT. Managing these records will strengthen organisational accountability and supports the implementation of VIT's strategic plan.

Refer to Section 5 for a list of applicable government standards and legislation.

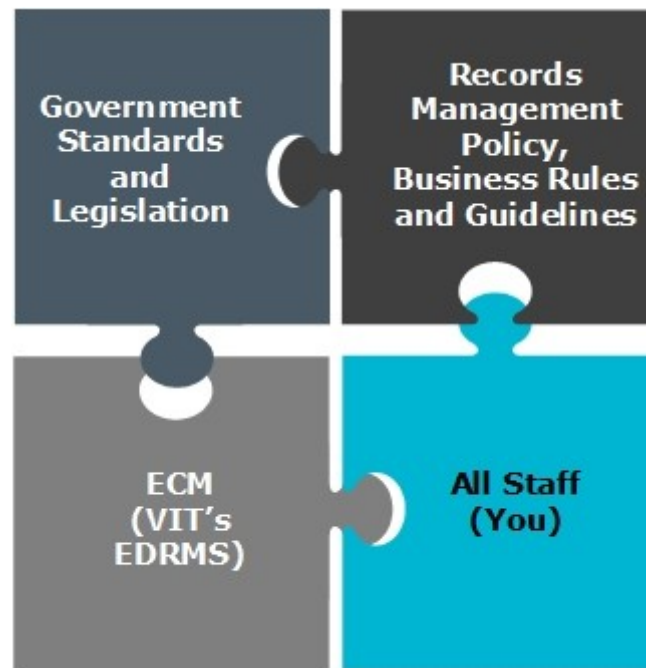


Figure 1 - VIT's Records Management Framework (see Appendix 1)

4.1. RECORDS MANAGEMENT FRAMEWORK

VIT has a Records Management Framework in place, as required under the *Public Records Act 1973*, and in compliance with PROV Standards and Guidelines as well as VIT's business requirements. All VIT recordkeeping practices and procedures are to be in accordance with this Policy and associated guidelines – see Figure 1 (Appendix 1).

VIT will monitor recordkeeping practices to ensure they comply with this Records Management Policy and associated guidelines, relevant legislation and PROV Standards.

The objectives to be achieved through the Program are that:

- a) VIT has the records it needs to support ongoing business activity and customer services, meet accountability requirements and community expectations
- b) records are maintained in formats that ensure long-term preservation and access
- c) records are available for the use of all staff including Council/Committee members and contractors wherever practicable
- d) VIT complies with all external requirements concerning records and recordkeeping practices.

4.2. RECORDS AS EVIDENCE

VIT's records are its corporate memory, and a vital asset for ongoing operations and for providing evidence of business. They assist staff including Council/Committee members and contractors in

making better-informed decisions and improving business practice by providing an accurate record of what has occurred.

Therefore, records are to be:

- a) managed in a consistent and structured manner;
- b) managed in accordance with VIT guidelines and procedures;
- c) stored in a secure and accessible manner in accordance with the [RM Business Rule – Access and Security](#);
- d) disposed of, or permanently archived, in accordance with the [RM Business Rule – Retention and Disposal](#); and
- e) captured using the authorised records system provided for this purpose, in accordance with the [RM Business Rule – Create and Capture](#).

4.3. OWNERSHIP OF RECORDS

Records created, received or used by staff including Council/Committee members, contractors or out-sourced service providers in the normal course of business are the property of VIT, unless otherwise agreed. This includes reports compiled by external consultants commissioned by VIT.

4.4. RECORDKEEPING SYSTEM

VIT's authorised records system is Enterprise Content Management (ECM).

ECM assists staff including Council/Committee members and contractors to capture records, protect their integrity and authenticity, provide access through time, dispose of records no longer required and ensure records of ongoing value are retained.

ECM is managed by the Information and Office Services Manager, who provides ongoing support, system administration, and support and training to business areas so that legislative, organisational, and community responsibilities are met.

All staff including Council/Committee members and contractors are to use ECM to ensure that:

- a) records (in all formats, including email) are routinely captured and disposed of when required – staff including Council/Committee members and contractors are not to maintain individual or separate files or recordkeeping systems or unmanaged electronic records;
- b) access to records are available for as long as required, and are appropriately managed;
- c) records are protected from unauthorised alteration or deletion; and
- d) ECM is the one source of truth of primary information for evidence about VIT's decisions and actions documented in its records¹.

4.5. CREATING RECORDS

Records must be created to capture evidence of VIT business as close as practicable to the commencement of an activity or issue. Records must be titled using VIT's Document Naming Convention and registered accurately within ECM.

See the [RM Business Rule – Create and Capture](#) for further information.

Documents received as hardcopy via daily incoming mail correspondence are digitised in accordance with the VIT's Pre-Action plan.

See the [Pre-Action plan](#) for further information.

¹ Other authorised core business systems are also used for capturing VIT business information, E.g. NEXUS, TechnologyOne Finance and Case Management

4.6.ACCESS TO RECORDS AND CONFIDENTIALITY

All staff including Council/Committee members and contractors have access to ECM. A staff's right to access records is determined by the relevance of the records to their duties, the business area in which they work, their level of delegated authority, privacy considerations and legal privilege and other specific considerations where confidentiality restricts the normal right of access to records. Authorisation from the appropriate Director is required before any access change is granted by the Information & Office Services Manager.

Managers must ensure that all records are adequately secured and protected from unauthorised access. All staff including Council/Committee members and contractors are responsible for complying with access rules and maintaining security. For advice on security of records, contact the Information and Office Services Manager.

Managers must ensure that appropriate access permissions exist for records held within business systems under their control and that changes are communicated to the Information and Office Services Manager.

All staff including Council/Committee members and contractors are required to comply with the Information Security Policy and protect records against loss, corruption of information and unauthorised access. Any potential risk is to be reported immediately to the Director, Shared Services.

Staff including Council/Committee members and contractors must not disclose or provide access to VIT records unless authorised. Where there is a need for records to be accessed, other than publicly available records, the request will be dealt with under the Freedom of Information Act 1982 and/or other relevant legislation. The Freedom of Information and Privacy Officer will be responsible for dealing with such requests, in consultation with the relevant business units.

See the [RM Business Rule – Access and Security](#) for further information.

4.7.STORAGE, ARCHIVING AND DISPOSAL OF RECORDS

The keeping and destruction of VIT records is governed by the Public Records Act 1973. This Act states that a public record is any record made or received by a public officer in the course of his duties (s.2). For the purposes of this Policy a "public officer" refers to all staff including Council/Committee members, contractors, and volunteers of VIT.

Managers are responsible for ensuring that records storage areas for physical records and electronic records under their control are secure and protected from accidental damage (such as damage caused by fire, water, mould or vermin) and unauthorised access by third parties. This includes records stored in office areas. For advice on storage areas, contact Information and Office Services Manager.

The location and movement of physical archive records must be tracked, to ensure that records can be easily located when required. It is the responsibility of the staff member to advise the Information & Office Services Team when possession changes or when the file is no longer required.

When information is no longer used regularly, decisions have to be made whether it can be destroyed or archived to secondary storage. We use a Retention Disposal Authority to determine the minimum amount of time the information needs to be kept before it can be approved by VIT's Information and Office Services Manager for archiving or destruction. For further information, refer to [RM Business Rule - Process for Archiving and Retrievals](#).

Records should be disposed of only in accordance with the Retention and Disposal Authority (RDA). Disposal actions range from permanent retention as an archive, to stipulating a minimum period of retention prior to destruction. VIT is required to comply with the following RDAs:

- Records of the Victorian Institute of Teaching (PROS 10/07), and
- General Retention & Disposal Authority for Records of Common Administrative Functions (PROS 07/01).

The Information and Office Manager is primarily responsible for the disposal of official records. For more information, refer to [RM Business Rule – Retention and Disposal](#).

4.8. HANDLING AND TRANSPORTING RECORDS

Remote access to the VIT record systems is preferable to taking records home or off premise. This occurs by using Microsoft SAML authentication to remotely hosted cloud based storage sites, like ECM.

Hardcopy Records removed from the office must be signed out and registered in a central register maintained by the relevant Director.

Hardcopy Records that are being transported outside of a facility, to ensure confidentiality and integrity in the event of an accident, theft, or other unforeseen event:

- should be couriered or express posted to ensure the items track-ability and proof of delivery;
- should be transported in a secure container such as a locked box or suitcase whenever possible; and
- should be transported without stops that involve leaving the records unattended if possible. If stops must be made, remove it and secure it.

If the Records are being accessed from or taken home to work during off-hours, employees' manager/director should be notified and approve such work at home off-hours.

Records in the home must be secured from access or view by family members and others. VIT members shall log out of VIT systems immediately after use and shall secure their login and password so that others cannot use it.

All staff including Council/Committee members must not save things to a local drive, use a VIT issued device to work from home.

Mobile devices must be password protected, encrypted and maintained in a safe and secure manner to protect the loss, un-authorized access, misuse, and destruction of the records. If Records are lost, stolen or improperly accessed by others, immediately notify the ITC Help Desk, Director or Information & Office Services Manager.

4.9. LEGACY FILES OR DIGITISATION OF HARDCOPY RECORDS

All legacy files or records are identified and managed as part of VIT's Record Management Framework.

Back-scanning of hardcopy collection of records that were used by VIT staff or that are quite old are converted/digitised in accordance with VIT's Post-Action Digitisation Plan. These records become the official record of VIT and the source record will then be eligible for disposal.

See the [Post-Action plan](#) for more information.

4.10. ROLE AND RESPONSIBILITIES

Records management is mandatory, and required of all staff including Council/Committee members and contractors.

4.10.1. CEO

The CEO has ultimate responsibility for recordkeeping across VIT including being responsible for ensuring a successful and compliant Records Management Framework. This includes allocation of resources necessary for program implementation, and for supporting and promoting recordkeeping policies, procedures, standards and guidelines. Delegated responsibility rests with the Director, Shared Services.

4.10.2. DIRECTOR, SHARED SERVICES

The Director, Shared Services is the senior manager responsible for the Records Management Framework, including accountability for ensuring compliance with external recordkeeping standards.

This role is directly responsible for the strategic business plans of the Recordkeeping Function.

4.10.3. INFORMATION AND OFFICE SERVICES MANAGER

The Information and Office Services Manager is accountable to the Director, Shared Services for providing business areas with assistance in the overall management of records including:

- providing assistance and education to business areas with the implementation, interpretation, and uptake of the recordkeeping business rules and guidelines;
- maintaining, developing and disseminating the Records Management Policy;
- developing and reviewing recordkeeping business rules and associated guidelines;
- administering ECM
- providing records management training, support and guidance to staff including Council/Committee members and contractors;
- monitoring and auditing compliance with records management system;
- reporting non-compliance of the records management policy; and
- identifying retention and disposal requirements for all records.

4.10.4. SENIOR MANAGEMENT (DIRECTORS, MANAGERS AND TEAM LEADERS)

Those in roles with supervisory responsibilities are responsible for:

- ensuring their staff create and keep accurate records as an integral part of their work and in accordance with this Policy and associated guidelines;
- implementing business rules and processes in their areas to ensure that adequate evidence of business activities is captured;
- fostering and supporting a culture within their branch that promotes good record management practices and aligns with this policy and any associated standards and procedures;
- assessing and monitoring compliance with this policy and reporting any identified compliance breaches or incidents to the Information & Office Services Manager; and
- ensuring that no records are destroyed without the appropriate advice and authorisation from the Information and Office Services Manager.

4.10.5. ALL STAFF

All staff including Council/Committee members and contractors, who create and receive records as part of their daily work are responsible for:

- registering records in ECM
- complying with legislation, this policy and any associated standards and procedures;
- ensuring records are handled respectfully so as not to damage or compromise the integrity;
- respecting confidentiality of corporate information and the privacy of personal information;
- preventing unauthorised access to records and information;
- ensuring records are not destroyed, removed or inappropriately released without management authorisation;
- on ceasing employment with VIT, transferring all records in their custody to their Manager or Team Leader; and
- reporting non-compliance of the records management policy to the Director, Shared Services or the Information & Office Services Manager.

All staff including Council/Committee members and contractors, who create, receive and keep records as part of their daily work, should do so in accordance with this Policy and associated guidelines. All staff have a responsibility to capture records into ECM.

This applies to hardcopy and electronic records, including email. No disposal of records should occur without authority from the Information and Office Services Manager.

4.11. GOVERNANCE

The Records Management Governance Group (RMGG) provides oversight and direction of the Records Management Framework. It comprises the Chief Executive Officer, Director (Shared Services) or delegate, and the Information and Office Services Manager. It can task a reference group to make recommendations. This is achieved by setting the policy and standards, monitoring and auditing performance, and ensuring the delivery of the program of work.

The role of the RMGG is to:

- regularly brief the Senior Management Group on recordkeeping issues;
- oversee the establishment of organisation-wide records policies and standards;
- oversee the implementation of the recordkeeping business plans;
- support recordkeeping across VIT;
- manage organisational change for recordkeeping;
- recommend recordkeeping related standards and requirements;
- consider new processes and systems and endorse programs and activities to improve recordkeeping; and
- consider recommendations from a reference group.

4.12. MONITORING COMPLIANCE

Compliance to this policy, and other recordkeeping business rules, is to be assessed quarterly and in accordance with the Records Management Compliance Audit Framework. *See RM Compliance Audit Framework* for further information.

This procedure is effective 01 July 2020 and will be reviewed on 30 June 2023.

Any queries about this policy should be directed to the Director, Shared Services on Ext. 6125.

5. RELATED DOCUMENTS, LEGISLATION AND POLICY

- Crimes (Document Destruction) Act 2006
- Electronic Transactions Act 2000
- Evidence Act 2008
- Evidence (Document Unavailability) Act 2006
- Freedom of Information Act 1982
- Health Records Act 2001
- Education and Training Reform Act 2006
- Education and Training Reform Amendment Act 2010
- Privacy and Data Protection Act 2014
- Public Records Act 1973
- Whistleblowers Protection Act 2001
- PROS Standards, Specifications and Guidelines

6. APPENDICES

APPENDIX	DOCUMENT NAME	DOCUMENT CODE
1	<u>Records Management Framework</u>	<u>1595017</u>

APPENDIX 1 – VIT RECORDS MANAGEMENT FRAMEWORK

Records Management Framework

Government Standards and Legislation

- *PROV Standards and Advices*
- *Crimes (Document Destruction) Act 2006*
- *Evidence Act 2008*
- *Freedom of Information Act 1982*
- *Health Records Act 2001*
- *Education and Training Reform Act 2006*
- *Privacy and Data Protection Act 2014*
- *Public Records Act 1973*

Enterprise Content Management (ECM) 'VIT' uses ECM to capture, register and maintain *official records*.

The system registers, maintains and tracks all official electronic and hardcopy records from their creation to their eventual disposal.

Other business systems may capture, register and maintain *transactional records* – document that evidence a transaction. E.g. NEXUS, VITIS, CRM, Case Management and TechnologyOne Finance.

All staff are to ensure that:

- official records (in all formats, including email) are routinely captured and disposed of when required – **staff are not to maintain individual or separate files or recordkeeping systems or unmanaged electronic records**
- ECM is the one source of truth of primary information for evidence about the Institute's decisions and actions documented in its records.



Records Managements (RM) Policy

- All staff including Council/Committee members, contractors, and outsourced service providers within VIT who create, receive and keep records as part of their daily work, should do so in accordance with this Policy and associated guidelines.
- All staff have a responsibility to capture records in VIT's official records system – ECM.

RM Business Rules:

Create & Capture - The capture and registration of official records that support and document business decisions, actions and transactions are essential aspects of ensuring continued business operation, regulatory compliance and corporate governance, along with any information that supports or informs that process.

Access & Security - Access & security restrictions, how you can access records, sharing of information, and access to information from external parties.

Retention & Disposal - purpose is to ensure official records are disposed of in a manner appropriate to their content and function.

Please refer to **RM Guidelines** for more detail information on:

- 'Official Records' checklist, Naming Documents and Managing Emails
- 'Sharing of Information Guideline' and Managing Vital Records
- Transferring Permanent Records to PROV, Transferring Temporary Hardcopy Records to Storage, Destroying Records of Temporary Value and Destroying Records Under Normal Administrative Practice (NAP)

Process for Archiving and Retrievals - provides clear instructions to all staff regarding the appropriate archiving and retrieval process

'All staff including Council/Committee members, contractors, and outsourced service providers of VIT'

You are Responsible for

- Making a record ('**creating**' it)
- Giving your record a meaningful title ('**classifying**' it)
- Putting the record into the recordkeeping system ('**capturing**' or '**registering**' it)
- Accessing records in the system ('**retrieving**' it)

Why do records matter to you?

In your everyday work, making and keeping records helps to:

- find and use the information you need
- share information with colleagues
- reuse good work done in the past
- produce evidence when required to explain a decision.

Where do you fit in?

- Follow the recordkeeping policy and business rules.
- Keep records in authorised storage areas.
- Ask if you not sure what to do.

Only destroy, delete, alter or remove records after appropriate authorisation.

You need to know how to use the system and what rules apply if we are to manage our records properly and make the best use of them.

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