

# INFORMATION MANAGEMENT POLICY

<b>Policy Number:</b>	2.3.3
<b>Approved by:</b>	Chief Executive Officer
<b>Date Effective:</b>	December 2025
<b>Date of Next Review:</b>	December 2026
<b>Applicable to:</b>	Councillors, Council employees and temporary staff, volunteers, contractors and consultants engaged by Council
<b>Responsible Officer:</b>	Chief Information Officer
<b>Related Policies:</b>	Fraud Control Policy Information Disposal Policy Privacy & Data Protection Policy Risk Management Policy Freedom of Information Policy CCTV Policy Social Media Policy
<b>Related Documents:</b>	Written Style Guide Councillor Code of Conduct Employee Code of Conduct
<b>Statutory Reference:</b>	<i>Freedom of Information Act 1982</i> <i>Privacy &amp; Data Protection Act 2014</i> <i>Evidence Act 2008</i> <i>Electronic Transactions Act 2000</i> <i>Health Records Act 2001</i> <i>Crimes Act 1958</i> <i>Crimes (Document Destruction) Act 2006</i> <i>Australian Standard on Records Management (AS ISO 15489)</i> <i>PROS 22/04 Disposal Standard</i> <i>PROS 20/02 Storage Standard</i> <i>Local Government Act 2020</i> <i>Victorian Public Service Code of Conduct</i> <i>Public Health and Wellbeing Act 2008</i> <i>Public Records Act 1973</i>

## OVERVIEW

To establish policy and recordkeeping framework outlining accountabilities and responsibilities for the creation, receipt, capture, protection, control, management and disposal of Wellington Shire Council's information in accordance with legislative requirements. The policy also specifies the potential consequences of non-compliance and/or breaches.

## THE POLICY

This policy applies to all information regardless of medium or format, created, received or retained, by any staff member, where they handle information of a council business nature and also applies to all contractors and consultants that handle information of a council business nature in accordance with their contractual obligations, volunteers, trainees and Councillors.

Wellington Shire Council is committed to making and maintaining information that fully and accurately reflects its business activities and undertakes to provide its staff with appropriate guidance, tools and services to ensure its recordkeeping commitments are achieved.

Information is a valuable resource and an important business asset. Good recordkeeping maintains corporate, personal and collective memory and provides protection and support in litigation including the management of risks associated with the existence of or lack of evidence of organisational activity.

Information also facilitates the conduct of business in an orderly, efficient and accountable manner. Procedures and other guidelines are not required to be adopted by Council.

This Policy aims to provide guidance to ensure that comprehensive and accurate information of all activities and decisions of Wellington Shire Council are created, managed and kept in accordance with relevant legislation.

This policy:

- Defines roles and responsibilities for the creation, management and disposal of information.
- Ensures full and accurate recording of all business activities, including decisions of Council are maintained to support community, business and legislative requirements.
- Ensures appropriate access and security levels are maintained.
- Ensures corporate information is easily retrieved and accessible now and in the future.

## Definitions

A comprehensive list of recordkeeping definitions is available by contacting Information Management staff or searching Wellington Shire Council's electronic document records management system (EDRMS) for the document titled "DEFINITIONS – RECORDKEEPING TERMS".

<b>Information</b>	Information created, received and maintained as evidence by an organisation or person in the transaction of the business, or in pursuance of legal obligations, "regardless of media".
<b>Document</b>	Documents consist of recorded information or data that can be structured or unstructured and in written, printed, or electronic form.
<b>EDRMS</b>	Electronic Document Records Management System.

## Responsibilities

Information Management responsibilities for Victorian Government agencies are detailed in the Retention and Disposal standards and specifications issued by the Public Record Office Victoria (PROV) under the *Public Records Act 1973*.

The Chief Executive Officer is responsible for ensuring that Wellington Shire Council complies with legislative requirements for recordkeeping, including the *Public Records Act 1973*.

All managers and supervisors are responsible for monitoring staff under their supervision to ensure that they understand and comply with information management policies and procedures. Managers and supervisors are also responsible for fostering and supporting a culture within their workgroup that promotes good information management practices.

All members of staff (including Councillors, consultants, volunteers and those under contract) have a responsibility to create, capture and manage complete and accurate information relating to Council's business, including decisions made, actions taken and transactions of daily business.

They must also respect the privacy of individuals and the confidentiality of corporate information and protect information from unauthorised access, alteration, removal or destruction and from inappropriate release of information.

Records management responsibilities of all staff as identified in the policy are included in staff position descriptions.

Councillors are responsible for ensuring that full and accurate recording of activities undertaken in the course of their official duties as Councillors are created, managed and disposed of appropriately to meet the Council's organisational needs and transparent governance practices.

Councillors must respect and protect the confidentiality of this information from unauthorised access and release. Information which has sought staff opinion or response are public records and must be captured in the organisations EDRMS or software fit for purpose and managed in accordance with the PROV Standards (PROS), Policies, Guides and retention and disposal authorities PROS 07/01 Common Administrative Functions, PROS 09/05 Local Government Functions, PROS 24/03 Human Resource Functions, PROS 16/01 Accredited Training Function and PROS 16/02 Non-Accredited Training Functions.

### **Staff Departure**

On ceasing employment or a contract with Council, employees (permanent and temporary), contractors, consultants are responsible to ensure that all physical information in their custody are transferred to their supervisor or returned to Information Management. They are also responsible for ensuring information is not deliberately or accidentally deleted or destroyed. Information must remain active for their required retention and be retrievable until they are eligible for destruction in accordance with the relevant retention and disposal authorities. Information Management staff manage authorised destruction of information which can only occur after inactive information has reached the minimum retention and has been approved for destruction by the Manager and General Manager of the business unit to which the information relates.

To ensure staff computer and software access is disabled promptly on their departure, relevant staff are alerted of the pending departure and must action departure requirements and sign the Departure Checklist. The Coordinator Information Management Services and the Senior Information Officer manage Councils EDRMS System Maintenance and promptly remove access rights to the system when staff departures, secondments and onboardings occur.

### **Policy Statements**

- Wellington Shire Council ensures all employees, Councillors, contractors and volunteers receive appropriate training, guidelines and practical advice.
- Wellington Shire Council ensures that information of longer-term value is identified and protected for historical purposes and that information identified as permanent is transferred.
- Wellington Shire Council follows sound procedures for the retention and disposal of all information.
- Wellington Shire Council does not condone the falsification, alteration, or damage of information.
- Wellington Shire Council follows sound procedures for the storage of all information, hardcopy and electronic. This includes the implementation of appropriate disaster preparedness planning and Approved Public Records Offsite Storage Supplier for physical information (APROSS).
- Wellington Shire Council has an Agreement with Grace Records Management (MAV Procurement) for the secure offsite storage of short and long term temporary information.

- Wellington Shire Council does not condone the destruction of information, except in accordance with PROV Standards.
- Information reasonably likely to be required as evidence in current or future legal proceedings must not be destroyed, concealed, rendered illegible, undecipherable or incapable of identification.
- Wellington Shire Council ensures that risk management and business continuity planning are considered as an integral part of information management practices.
- This policy will be communicated throughout Wellington Shire Council through all levels of business to all members of staff (including volunteers and those under contract, and Councillors) and must be incorporated in regular staff training including, staff induction training and Councillor inductions.
- Onboarding and existing staff complete an inhouse e-learning training course on Recordkeeping, Privacy and Freedom of Information and are required to re-complete the training every two years to maintain currency and knowledge.
- EDRMS training is provided to relevant staff via one-on-one and group face-to-face and online training sessions and Information Management staff are readily available to assist with recordkeeping enquiries and EDRMS ongoing assistance.

## **Recordkeeping Systems**

Information systems at Wellington Shire Council manage the following processes:

- Creation and capture of information;
- Maintenance and management of information;
- Storage of information;
- Protection of information integrity and authenticity;
- Security of information;
- Access to information; and
- Disposal of information.

Council's EDRMS assists in ensuring information is full, complete, accurate and reliable; is compliant, adequate, complete, meaningful, comprehensive, accurate and authentic, by being securely maintained to prevent unauthorised access, alteration, removal or destruction.

Access to information must be open, unless there is a justifiable reason to restrict the access.

Information captured within Council's authorised EDRMS is accessible to all staff unless restricted access is required. System Administrators are responsible for assigning access rights to EDRMS accounts and auditing access periodically.

The following exemptions to general access apply:

- where information is commercial in confidence, personal in confidence, or management in confidence; and
- where information is restricted due to legislative or business requirements.

While the EDRMS constitutes Wellington Shire Council's preferred primary information system for all corporate administrative information, there are a number of databases and software applications that manage information which operate outside of the EDRMS.

## **Information Ownership**

Any physical document, data or information in electronic format, irrespective of how it came to be in a computer system owned or managed by the Council remains the property of the Council including any personal documents and emails.

## **Storage**

The PROS 20/02 Storage Standard requires that all public information, regardless of format, are stored in areas appropriate for their security, preservation and retrieval.

## **Security**

The Victorian Public Sector Code of Conduct requires that public sector employees with access to official information ensure it is only used for official purposes and in an approved manner. Official and personal information is handled according to relevant legislation and public sector body policies and procedures. Public sector employees may only disclose official information acquired in the course of their public employment when required to do so by law, in the legitimate course of duty, when called to give evidence in court, or when proper authority has been given. Information must only be retrieved and used for authorised purposes in accordance with relevant legislation and access policies.

Information must be kept secure from unauthorised access, unauthorised release, alteration and unlawful destruction.

## **PENALTIES AND EXEMPTIONS**

Adherence to the Information Management Policy is a mandatory requirement for all staff including: Chief Executive Officer, General Managers, Managers, Coordinators, staff, contractors, consultants, volunteers, and Councillors (where the records are of a council business nature).

Where there is evidence of a breach of this policy, Wellington Shire Council will conduct an investigation to determine the circumstances and extent of the breach.

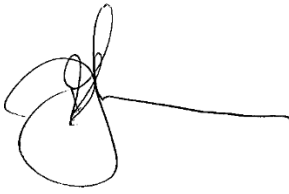
Non-compliance or breaches of this policy, associated standards and legislative requirements by Council employees, Councillors, contractors and/or volunteers, will be addressed in accordance with the either the Employee Code of Conduct or Councillor Code of Conduct as appropriate.

Section 254 of the *Crimes Act 1958* (the Act) creates an offence relating to the destruction of a document or other object that is reasonably likely to be required in evidence in a legal proceeding. It is important to note that the Act creates this offence in situations where no litigation is actually commenced (it has always been illegal to destroy evidence once a case has actually been launched). This covers circumstances where an individual or organisation destroys documents that may at some future time be needed in evidence, and where this need can and has been anticipated. The Act specifies penalties for the offence, for both individuals and for corporate entities.

## **ENQUIRIES/FURTHER INFORMATION**

Enquiries regarding Information Management or this Policy can be directed to Council's Coordinator Information Management Services by contacting 1300 366 244 or emailing [enquiries@wellington.vic.gov.au](mailto:enquiries@wellington.vic.gov.au).

**This policy** is approved by the Chief Executive Officer on 18 December 2025.



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**DAVID MORCOM**  
**Chief Executive Officer**

#### REVISION HISTORY

VERSION	DATE	SUMMARY OF CHANGES
1.0	December 2022	Changed Date of Next Review to October 2023.  Changed Manager Information Services to Chief Information Officer.  Updated reference to APROSS for approved public records offsite storage supplier to correct acronym.
1.1	December 2023	Changed Date of Next Review to December 2024.  Minor formatting throughout and updating of terms for consistency.
1.2	December 2024	Changed Date of Next Review to December 2025.  Minor paragraph simplification under The Policy and update of relevant PROS standards.
1.3	December 2025	Date of Next Review updated to December 2026.  Renaming from “Records” to “Information” Management Policy to encompass all information held by Council.  Universal replacement of word “Records” to “Information”.  Minor word and formatting amendments throughout.  Updating of PROS disposal standard to 22/04.  Updated requirement for in-house e-learning training completion every two years.