

24. Records and Data Management Procedure

Purpose

The purpose of this policy is to establish the framework needed for effective records management at the Lord Somers Camp and Power House (LSC&PH).

This Procedure provides advice to LSC&PH employees and volunteers on the creation and use of records and other data, and sets standards for classifying, managing and storing these.

This records and data management process will also ensure:

- Resources are not wasted on the distribution of unimportant or useless information
- Only valid information is kept
- Information is kept up to date
- Information is provided in a form that can be used by the people who need it
- Confidential or proprietary information is restricted to the people who have a genuine need to access it, and
- Information is retained that could solve a problem, improve opportunities, avoid costly errors, or deflect potential litigation.

Scope

These Procedures apply to all employees and volunteers at LSC&PH, including Board, Committee and Working Group members.

It does not apply to members, participants, or other stakeholders.

Definitions

Employee	Any person employed by Lord Somers Camp and Power House.
Executive Team	A leadership team for a specific LSC&PH program or activity. Specific members/ roles of an Executive Team are at the discretion of the Program or Activity Leader.
Information	Knowledge that is communicated or received. It is the result of processing, gathering, manipulating and organising data in a way that adds to the knowledge of the receiver.
Information management	A system for creating, collecting, organising, storing, retrieving and distributing information. This information may be in any format and available from internal or external sources.

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Leader	<p>Any person (paid or unpaid) over the age of 18 who is responsible for the control and safety of members/volunteers placed in their care whilst holding a formal position in Lord Somers Camp and Power House. A leader could include but is not limited to:</p> <ul style="list-style-type: none"> • Camp Leaders • Deputy Camp Leaders • Executive Officers • Programs Leader • Slushie King and Slushee Queen • Heads of Departments
Member	<p>Any person who has a current membership subscription to LSC&PH, including various life memberships, term membership or honorary life membership.</p>
Participant	<p>Any person who attends an LSC&PH program as a participant or a grouper.</p>
Record	<p>Information that is information in any form (including data in a computer system) and that is required to be kept as evidence of the activities or operations of a business.</p>
Records management	<p>A system for creating, receiving, maintaining, using and disposing of records. This includes processes for capturing and maintaining evidence of business activities and transactions.</p>
Volunteer	<p>Any non-member who attends LSC&PH activities as a member of the camp's staff under direction of a Camp Leader.</p>

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Responsibilities

Board	<ul style="list-style-type: none"> • Approve Policies as they are developed or reviewed
Committees of the Board	<ul style="list-style-type: none"> • Review Policies and Procedures as indicated within each document
CEO	<ul style="list-style-type: none"> • Approve Procedures as they are developed or reviewed
Office staff	<ul style="list-style-type: none"> • Establish and maintain systems that are consist with this Procedure to ensure that records and data are secure, yet accessible by authorised employees and volunteers. • Arrange archiving and destruction of records as indicated below

Procedures

General

All information, in paper copy, electronic or any other format, created by LSC&PH staff in the course of their employment, or that is accessed by staff on LSC&PH's equipment, is the property of LSC&PH .

Work-related information or storage devices (such as USB drives) must not be taken from LSC&PH without permission from the CEO or Camp Manager

Creating records

Many LSC&PH staff members create records when they collect and document and / or store information from employees, volunteers, members, participants, and other stakeholders.

Information that should not be recorded includes information that is not related to LSC&PH's activities and decisions and duplicated information where an appropriate record has already been created.

Records created must contain all relevant detail and be accurate and objective.

Wherever possible, records should be created in digital format. Hard copy records should only be created when absolutely necessary (such as when they are required for legal purposes).

Document Control

Documents created for LSC&PH must have document control applied to ensure that only current and up-to-date documents and forms are used and referenced. This includes:

- title or document reference

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- issue date (month/year format)

Out of date, superseded or revoked documents are to be archived or disposed of in accordance with the relevant procedures listed below.

Updating Policies and Procedures

Policies and procedures are designed to be 'living' documents that provide a central source of information and direction for all staff and other stakeholders. They make sure everyone at LSC&PH is following a consistent approach and should help guide staff in making decisions.

Policies and procedures need to match what is happening in the organisation. If there is a discrepancy, either staff need to be retrained to follow the correct procedures, or the procedures should be updated to reflect the true process.

Updates to policies and procedures should occur:

- when there are changes to legislation or regulations relevant to LSC&PH's services
- when there is a decision by the Board or CEO to change a process
- following an incident and the investigation reveals a change in process is needed
- if there is feedback or a complaint and the investigation reveals a change in process is needed
- if a new system is implemented
- within the specified timeframe for review (if this has not occurred prior) e.g., every 1- 3 years, depending on the document review cycle or
- as part of continuous improvement activities and it is identified that changes are required.

To update a procedure, the relevant Board Committee will

1. Draft

Prepare a draft document. This may need to be done in consultation with other staff, participants, or other stakeholders, depending on the source or nature of the change.

2. Review Draft

Once the draft has been prepared, the Committee will review the proposed procedure and note any changes required.

3. Consult

Depending on the source or nature of the change, consult with other relevant staff, participants or other stakeholders and obtain their feedback about the proposed Draft.

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4. Approve

When no further changes are required, the Board or CEO will approve the Policy or Procedure. Approval of the Policy is to be documented in the Board meeting minutes.

5. Publish

Once the procedure has been approved, the CEO will ensure that the finalised document and place it on the shared drive and website. Office staff will update LSC&PH's *Policy and Procedure Register* with the details of the change.

6. Archive

Any previous versions of the procedure must be archived/removed from access as per the *Retaining and Disposing* section of this procedure.

7. Communicate/Train

Depending on the nature of the change will determine what communication and/or training is required to ensure that all relevant staff and stakeholders are informed and aware of the new requirements.

Storing records

Records must be stored securely in the most appropriate system, whether it be physical (e.g. locked filing cabinets) or electronic. For guidance on what system should be used to store a particular record, staff should consult the office staff.

Records should be created and stored methodically and logically (e.g. in relevant categories, on relevant files, in chronological order, using naming conventions, etc.).

Where information is initially received in a digital format it should be retained in that format where possible (for instance, not printed and filed in hard copy). Digital records should only be converted to a different digital format if the content and quality of the record can be maintained.

Electronic Records

LSC&PH's electronic records are stored securely in the following information management systems:

- Operoo for financial management
- Cvent for participant record keeping and
- Microsoft 365 for business-related records, including emails.

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Staff must use individual user names, passwords, and two-factor authentication to access these systems. The systems have back up and disaster management arrangements in place that are managed by the respective system suppliers. [Refer to **Appendix – Guidance Notes** at the end of this policy]

All LSC&PH computers have password protection.

Business records must not be stored in email folders, shared folders, personal drives or external storage devices such as USBs, as they are not secure.

Where an email is considered a LSC&PH record, it must be captured in the relevant information management system as soon as possible.

Records created when using social media applications or mobile devices may also need to be captured in the relevant information management system.

Hard Copy Records

All hard copy records that contain private and confidential information about members, participants, staff or LSC&PH must be stored in a locked filing cabinet. Filing cabinet keys are stored in a lockable box and are available to authorised staff when they need to access files. Access to these keys is managed by the office staff.

Filing cabinets should be kept in secure, lockable areas with access limited to authorised staff only. The cabinets should be regularly maintained and cleaned and protected from pests, water, damp and mould. They should be stored away from direct sunlight, heat and risk of fire.

Where it is necessary to remove private and confidential records from LSC&PH's premises, they must be stored securely in a non-transparent container (for example, a locked brief case).

Using records

Access to LSC&PH's information management systems must be approved by LSC&PH office staff.

Access to LSC&PH's information management systems will be reviewed regularly by the office staff and may be amended, suspended or terminated if a staff member's employment situation changes.

Staff must only access records that are necessary for them to fulfil their duties. More detail on access to and disclosure of records is provided in LSC&PH's *Privacy Policy and Procedure*.

To protect records when they are being used, staff must lock unattended computers and maintain a 'clean desk' policy.

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Remote access to records

Office staff must approve any requests for access to systems that are accessed offsite, such as via personal mobile devices. Security of all devices must be reviewed before approving so that it does not compromise privacy and confidentiality requirements (such as having username and password protections along with two-factor authentication), and staff must be made aware of their obligations to protect LSC&PH data.

Retaining and disposing of records

Records that are not frequently used or that are not required for current business use (inactive records) may need to be:

- archived - if they need to be retained for a certain period or
- disposed of - if they have already been kept for the required retention period.

The office staff are responsible for identifying records that need to be retained or disposed as part of the file, physical and digital access audits detailed above.

Retention Periods

Records that are considered public must be retained for the periods set out in the Victorian Government Standards - <https://prov.vic.gov.au/recordkeeping-government/how-long-should-records-be-kept/retention-and-disposal-authorities-rdas>

In most cases LSC&PH's records are not public, but contain personal information, which is subject to Victorian and Australian Privacy Law.

All records relating to LSC&PH's operations and service delivery must be kept for a minimum of seven years from the date they were created.

As per the recommendation of the Royal Commission into Institutional Responses to Child Sexual Abuse, records relating to disclosures or possible disclosures of child sexual abuse will be retained for a minimum of 45 years.

The Australian Securities and Investment Commission (ASIC) requires companies to keep records for seven years from the date they were created.

The Fair Work Ombudsman (FWO) requires businesses that employ staff to keep employee records for seven years from the date they were created.

The Australian Taxation Office (ATO) requires businesses to keep records for five years from the date they were created. For example, a document used in the 2016 financial year must be kept until the end

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of the 2021 financial year.

Archiving Hard Copy Records

Inactive hard copy records with less than **12 months** of their retention period remaining should be kept in the same way and location as active records. Inactive records with **12 months** or more of their retention period remaining should be archived.

Inactive records that require archiving should be grouped with other similar records and placed in an archive box. All extraneous materials such as rubber bands, paperclips, bulldog clips, plastic sleeves and display folders should be removed. Staples do not need to be removed.

A Contents List should be completed and attached to each archive box. Archive boxes should be numbered and stored in a secure location.

LSC&PH's archived records are stored at **Albert Park** in a locked room and protected from pests, water, damp and fire .

Archiving Electronic Records

Electronic records will be archived using the archive functionality in LSC&PH's electronic information management systems.

Where electronic records are not held in an information management system, they must be stored on a secure internal or external storage device. The file formats and the devices records are kept on must be able to be read for as long as the record is required to be retained.

Disposing of Records

Records should be disposed of once they have been kept for the required retention period.

Disposing of Hard Copy Records

Once information can be destroyed **it is shredded using a secure shredder.**

Disposing of Electronic Records

The "delete" function is not sufficient to destroy electronic records as the information may still be recoverable.

Electronic records must be destroyed either by physical destruction of the storage device they are held on, or by clearing or purging the records held on the device.

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Freedom of information

LSC&PH will provide members, participants, their representatives and government agencies access to its records where this is required by law, including Freedom of Information legislation.

Other relevant policies and procedures

- Privacy Policy and Procedure

Policy review

This Procedure will be reviewed every three years by the LSC&PH Risk Committee, or sooner if warranted by internal or external events or changes.

Changes to the Procedure will be recommended by the Risk Committee to the CEO.