

INFORMATION MANAGEMENT POLICY

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File Number	18.63.001 / PL202064
Responsible Division	Leadership
Related Documents	Elected Members Information Management Policy Privacy Policy and Procedure Mail Identified With Protective Markings Procedure Reporting - Confidentiality Clause In Contracts Procedure Risk Management Policy and Procedure Information Management Destruction of Temporary Records Authorisation Procedure Information Management – Storing Data in the Cloud – Risk Assessment Information Technology (IT) Usage Guidelines General Disposal Schedules
Applicable Legislation	<i>State Records Act 1997</i> <i>State Records Adequate Records Management Standard 2013</i> <i>Freedom of Information Act 1991</i> <i>Local Government Act 1999</i> <i>Independent Commissioner Against Corruption (ICAC) Act 2012</i> <i>Ombudsman Act 1972</i> <i>Evidence Act 1929</i> <i>Surveillance Devices Act 2016</i>

Introduction

The *State Records Act 1997* (the Act) governs the obligations and responsibilities of Councils in relation to the management of official records. Under the Act, each Council has an obligation to maintain official records in its custody in good order and condition. This obligation applies not only to the capture, storage, maintenance and disposal of physical records, but also those in electronic format.

An official record is defined in s.3 of the Act to mean a record made or received by the Council in the conduct of its business.¹ This means that employees of the Council act as representatives of the Council and any record created, sent, received, forwarded or transmitted by Council employees in the performance and discharge of their functions and duties may be classified as an official record. However, records that are merely transitory, temporary, personal or private in nature will fall outside the definition of official records.

The establishment of an effective and efficient record keeping environment ensures standardisation, protection and retrieval of information improving levels of quality customer service.

Good records management is of key importance to good governance. Records are vital ingredients in the support of the Council's ongoing business activities. The Council is committed to managing its records of continuing value and their timely transfer to the State Records Office in accordance with the Act, and best practice standards.

In addition to its record management obligations under the Act, the Council is required to keep adequate records in order to fulfill its responsibilities under other Acts such as the *Freedom of Information Act 1991*, and legal processes, such as discovery and subpoenas. Records may also be required by Royal Commissions, the Ombudsman, the Courts, auditors and other people or bodies. The *Local Government Act 1999* requires the Chief Executive Officer to ensure records required by this or another Act are properly kept and maintained.

¹ See the statutory definition of "official record" set out on page 3 of this Document for exceptions to this definition.

Definitions

Continuing Value – records of continuing value are those that contain information that is of administrative, legal, fiscal, evidential or historical value to the Council.

Council Business – may include the provision of services, delivery of programs, development of policies, making of decisions, performance of Council functions and other similar types of transactions.

Council employees – includes persons employed by the Council, volunteers, trainees, work experience placements, independent consultants and contractors and other authorised personnel offered access to the Council's resources.

Dispose of – to dispose of an official record means to:

- destroy or abandon the record

- carry out an act or process as a result of which it is no longer possible or reasonably practicable to reproduce the whole or a part of the information contained in the record

- transfer or deliver ownership or possession of or sell the record, or purport to do so,

but does not include to transfer or deliver the record to the State Records Office or between the Council and another agency.²

Email – Is a service that enables people to exchange documents or messages in electronic form. It is a system in which people can send and receive messages through their computers. Each person has a designated mailbox that stores messages sent by other users. You may retrieve, read and forward or re-transmit messages from your mailbox.

Temporary/Transitory Record – A record is transitory or temporary in nature if it is of little or no continuing value to the Council and only needs to be kept for a limited or short period of time, such as a few hours or a few days.

Normal Administrative Practice – provides for the routine destruction of drafts, duplicates and publications, acquired or collected by Council employees in the course of their official duties, with the test that it is obvious that no information of more than transitory or temporary value to the Council will be destroyed. Material that can be disposed of under Normal Administrative Practice comprises items of a temporary or transitory nature created, acquired or collected by Council employees in the course of their official duties. Such material has no ongoing value and is not usually incorporated into the Council's corporate records management system.

Record – ISO 15489-1:2001 defines records as "information created, received, and maintained as evidence and information by an organisation or person, in pursuance of legal obligations or in the transaction of business".

This information can take any form (written documents, information captured in a software program, audio or video tapes, e-mails etc), but is always connected to a Council business process. Conversely, if a record is missing, a Council business process or legal procedure cannot be fully reconstructed.

Official Record – A record made or received by the Council in the conduct of its business, but does not include:

- a record made or received by an agency for delivery or transmission to another person or body (other than an agency) and so delivered or transmitted

- a record made by an agency as a draft only and not for further use or reference

- a record received into or made for the collection of a library, museum or art gallery and not otherwise associated with the business of the agency

² See definition in section 3(1) of the *State Records Act 1997*.

a Commonwealth record as defined by the *Archives Act 1983* of the Commonwealth or an Act of the Commonwealth enacted in substitution for that Act

a record that has been transferred to the Commonwealth.³

Purpose of this Policy

The purpose of this Policy is to establish a framework for the implementation and maintenance of an appropriate corporate records management system. The Council operates in an accountable and community orientated environment and is committed to maintaining a corporate records management system that meets its business needs as well as its legal and accountability requirements.

Scope of this Policy

The business activities of the Council will be documented, captured and managed to protect the integrity, enhance the efficiency, preserve the history and provide a business context of the Council. Business activities include decisions made, actions taken, transactions completed and interaction with stakeholders.

Records will be created, received and managed in accordance with legislative and business requirements of Council, and managed and maintained in accordance with the guidelines associated with this policy. This includes records created, received and stored in all formats and media.

Objectives of the Corporate Records Management System

To ensure that the management of the Council's information resources and corporate records management system provide timely and comprehensive information to meet operational business needs, accountability requirements and community expectations.

To ensure the preservation of the Council's 'corporate memory' through sound record keeping practices and the accurate capture of information to meet legal, evidential and accountability requirements.

Obligations of Records Users

Council employees must not intentionally damage, alter, dispose or remove official records of the Council without authorisation to do so. Council employees are required to handle Council records with care, respect and in a sensible manner to avoid damaging records, with a view to prolonging their life span. Council employees must not eat, drink or smoke near Council records or in records storage areas.

Council employees must ensure that Council records in any format, including electronic documents and electronic messages, that they personally receive or send are captured into Council's corporate records management system. Records must be readily accessible in order to meet business and accountability requirements. Members of the Information Management Service Area are required to follow authorised procedures in carrying out records management functions.

Electronic records are to be captured and maintained as functioning records by preserving their structure, context and content. In order to maintain their value as evidence, electronic records must be inviolate. That is, they cannot be altered or manipulated for as long as they are retained.

Council employees who do not comply with this Policy may be subject to disciplinary action under the relevant Code of Conduct, and/or subject to criminal or civil proceedings. Employees should report breaches of this Policy to the Coordinator - Information Management.

³ See definition of "official record" in section 3(1) of the *State Records Act 1997*.

Confidential Records

If an employee believes a record that is to be incorporated into the corporate records management system is of a highly sensitive or confidential nature, the Coordinator - Information Management should be advised. It is the discretion of the Coordinator - Information Management to whether such information will be treated as confidential and further access to those records be restricted.

Records Security

The security of all Council records is crucial as records provide evidence of business transactions, support management decisions and ensure public accountability requirements are met. Records in all formats must be stored securely to prevent unauthorised access, destruction, alteration or removal.

Council employees are responsible for the safe custody of all files and documents that are allocated to them. Sensitive or confidential information should be placed in a secure storage area when not in use. When the action has been completed the file/documents should be returned to the Information Management Service Area for storage.

File storage units should be locked overnight wherever possible to prevent unauthorised access. Amongst other risk management considerations, this reduces the possibility of damage by water or fire in the event of a disaster.

Council records are not to be stored at home or left in cars as they could be lost, damaged or stolen. Vital records should be stored in protective or fire resistant conditions with suitable access. Confidential records must be stored in locked storage cabinets/areas which are accessible only by authorised persons.

Any department which is considering storing data outside of Alexandrina Council IT infrastructure, eg 'Cloud computing', must conduct a risk assessment as per Council's *Risk Management Policy* and *Procedure* to ensure the privacy, confidentiality and security of the information is not compromised. A *Storing Data In The Cloud - Risk Assessment Form* is available on Connect Corporate Documents and should be completed in consultation with Manager – Information Technology Services and Coordinator - Information Management.

Any department which is considering storing data in software that is not part of the Council's Corporate Business Systems should ensure that business transactions comply with this *Information Management Policy* and the relevant legislation.

Responsibilities and Accountabilities

At commencement of employment all new employees are required to sign the Information Management Policy to acknowledge they have read and understood said policy

Chief Executive Officer

The role of Chief Executive Officer of the Council, as prescribed by s.99 of the *Local Government Act 1999*, includes ensuring that records required under any legislation are properly kept and maintained.

Corporate Records Manager

Responsibility for Council's corporate records management system is assigned to the Coordinator - Information Management as the Corporate Records Manager, under the supervision of the Manager – Information Technology Services. The Manager - Information Technology Services is under the supervision of the General Manager Resources. The General Manager Resources is directly accountable to the Chief Executive Officer.

The role of the Coordinator - Information Management is to provide a strategic focus for record keeping throughout the Council and is responsible for:

- ensuring official records are managed in accordance with the *State Records Act*

- establishing records management policies and procedures for the whole Council
- establishing corporate standards for record keeping, records storage and records management
- measuring performance of Council business units against these standards
- providing advisory services to Council employees
- developing corporate electronic records management strategies
- working with all General Managers and Managers of information resources to develop coherent information architecture
- working with all stakeholders, including FOI officers and executive management staff, to ensure record keeping systems support organisational and public accountability
- providing Council staff with the tools and appropriate training to allow them to meet their information management responsibilities
- keeping abreast of latest developments in legislation, standards and guidelines and changes in industry practices
- decisions relating to information management practices and processes, in consultation with all stakeholders
- monitoring the systems and practices of staff and reporting these to senior management
- the validation or alteration of records
- the processes and decisions relating to the disposal and transfer of records to State Records SA.

General Managers

General Managers are responsible for ensuring Council employees under their supervision adhere to the record keeping requirements and guidelines, as established by the Coordinator - Information Management. They are also responsible for maintaining any business records that belong to their departments, but are managed outside the corporate records management system in such a condition so as not to cause their destruction or make them irretrievable.

General Managers are also responsible for approving lists of records relating to the business processes within their area, ready for transfer, sentencing or formal destruction. This approval must be undertaken prior to general destruction approval by the Chief Executive Officer.

Council Employees

Council employees are required to be aware of record keeping requirements in the performance and exercise of their duties and functions. The record keeping obligations on Council employees include:

- creating records to support the conduct of Council business activities
- ensuring records are captured into the corporate records management system
- ensuring paper records are forwarded to the Information Management Service Area for capture into files
- being aware of and learning Information Management procedures, and where records are kept within Council
- not destroying Council records without authority from the Coordinator - Information Management

- protect and care for records in their possession by storing in appropriate environments
- ensuring records containing confidential and sensitive information are protected and are not inappropriately disseminated, both internally and external
- ensuring all ongoing activity carried out on records is managed and maintained
- ensuring the integrity of the Council is maintained by not recording derogatory remarks in or on records
- the awareness that all records created and received in the conduct of the Council's business are the property of the Alexandrina Council and must be afforded the care and protection identified in this Policy and associated guidelines.

Information Management Service Area

Council's Information Management Service Area is operationally responsible for the efficient management of all Council records (physical and electronic), incorporating sound record keeping principles and records management best practice guidelines and procedures for Council employees. This service area is also responsible for preparing the destruction of records and the transfer of records to State Records or third party storage providers.

It is responsible for the effective management and system administration of the Council's primary record keeping. This area is also responsible for the system administration of Council's corporate records management system (business systems excluded).

This area will assist Council employees in fulfilling their record keeping responsibilities, and provide advice and training throughout the implementation of this policy, procedure and strategies.

It will also assist Council Employees in retrieving and reproducing information upon public and FOI requests, following payment of fees consistent with the Alexandrina Council's *Fees and Charges Schedule* or other statutory charges.

Destruction Methods

The Information Management Team is responsible for the retention and disposal of Council's records.

Information resources not considered to be records, or those that do not add value and context to a record and have no ongoing value to Council (ephemeral material) may be destroyed without applying a disposal schedule and seeking authorisation.

Care must be taken to not destroy information which has value to Council, and may result in loss of information, noncompliance, legal action, embarrassment or penalties.

If there is doubt, consultation must occur with the Information Management Team prior to the destruction of material.

Official records may only be disposed of in accordance with the General Disposal Schedule No. 40 and 21 for Local Government Authorities in South Australia, and any other relevant Disposal Schedules. A copy of GDS40 can be accessed through the State Records website at <http://www.archives.sa.gov.au>.

The Information Management Service Area will manage the life cycle of the record. This includes list preparation for records where both the business needs and the retention period outlined in the relevant General Disposal Schedule have expired, and will be undertaken in accordance with Council's Information Management Destruction of Temporary Records Authorisation Procedure.

Records must be destroyed in such a manner that no information is retrievable. Records in physical format will be destroyed by shredding or pulping. Records in electronic format should be destroyed by reformatting, rewriting or degaussing. The use of the 'delete' function in software packages is not sufficient to destroy electronic records, as 'deleted' data is still able to be recovered. With the consent

of the Coordinator - Information Management in conjunction with the Manager – Information Technology Services, electronic file shredding software may be used to ensure the complete destruction of electronic records.

Guidelines for Determining what are Official Records

The following guidelines relate to some common records which Council employees may create, send, receive, forward or transmit. This is not an exhaustive list, but is provided to assist the assessment of information that constitutes an official record under the *State Records Act*.

Audio Recordings

The Council creates audio recordings of some meetings. Audio records of these meetings fall within the definition of 'official record' for the purposes of the Act and must be preserved in accordance with correct information management practices under this policy.

All audio recordings that reflect a business transaction of Council should be captured in the corporate records management system. These will be retained by the Information Management Service area and disposed of in accordance with GDS40.

Where audio recordings are made on tape, CD or other hard-copy media, they will be retained by the Information Management Service area in a secure storage area.

Digital audio recordings must be captured in the corporate records management system as soon as possible after their creation.

Where a Council or committee meeting is open to the public, the Council cannot prevent a member of the public from making an audio recording of that meeting. Council only has powers to intervene to prevent this if the activity of recording the meeting where it can reasonably be said to amount to obstruction, hindrance, interference with or interruption of the meeting.

Council is not obliged to retain audio recordings which have been created by members of the public. These are not 'official records' within the meaning of the Act, however, where audio recordings are provided to the Council by the member of the public who has made the recording, they will then become an 'official record', in that they have been received by the Council. Where audio recordings are provided to the Council, they must be forwarded to the Information Management Service Area for retention and eventually, correct disposal under the Act and GDS40.

Closed Circuit Television (CCTV)/Video Surveillance

CCTV/Video Surveillance is positioned at various sites within the Council area. The primary purpose is to provide a safe environment where everyone may enjoy the amenity of the Council area without disruption or fear of harm. These recordings will be retained by the Council and disposed of in accordance with GDS40.

Diaries/Appointment Books/Calendars

Diaries, appointment books and calendars are generally used to record appointments. They may also be used to record messages and notes, some of which may only be an *aide memoire* of a routine nature, but others may be of significance to the conduct of Council business.

In order to ensure that all official records are captured and retained in accordance with the Act, Council employee diaries, appointment books and calendars must be forwarded to the Information Management Service Area for incorporation into the Council's corporate records management system at the end of the calendar year to which they pertain.

All electronic calendars are captured into the corporate records management system.

Drafts

A draft record is the preliminary form of any writing in electronic or physical format. Draft records may include outlines of addresses, speeches, reports, correspondence, file notes, preparatory notes, calculations and earlier versions of the draft. Drafts may or may not be circulated to other Council employees for comment or revision.

Drafts will be of no continuing value and may be destroyed when reference to them ceases if they:

- contain addresses, speeches, reports, correspondence, file notes that are not circulated to other employees
- are circulated to other Elected Members, where only editorial or typographical changes have occurred.

Drafts which document significant decisions, reasons and actions or contain significant information that is not contained in the final form of the records have continuing value and must be captured in Council's corporate records management system. For example:

- drafts which contain significant or substantial changes or annotations (other than editorial changes)
- drafts relating to the formulation of legislation, legislative proposals and amendments
- drafts relating to the formulation of policy and procedures, where the draft provides evidence of the processes involved or contains significantly more information than the final version
- drafts of legal documents (contracts, tenders etc).

Duplicates

Duplicates are exact reproductions or copies of records where the original or authorised copy is contained within the Council's corporate records management system. Duplicates of records will be of no continuing value and may be destroyed when reference to them ceases where they are:

- issued to a Council employee or Elected member for information or reference purposes only
- of internal or external publications issued or received for information or reference purposes (eg annual reports, brochures, trade journals, price lists).

Messages

Messages may be sent or received via a range of methods, such as telephone and voice mail, email, post-it or sticky notes, facsimile, pieces of paper, or transmission reports.

Messages may be sent or received on a variety of matters. Some messages will have continuing value, if they are considered significant to the conduct of Council business. Others, such as those very routine in nature, will only have temporary value.

For example:

- routine or simple administrative instructions, such as edit corrections, distribution lists for informational purposes, file creation requests, and social invitations and messages
- information only messages, duplicates or working copies/memos
- private messages or personal comments between officers which would not provide evidence or be required for accountability purposes

- original messages that have been transferred or transcribed into appropriate formats for incorporation into Council's corporate records management system
- messages that do not relate to the business functions of Council

may be destroyed when reference to them ceases.

Messages that have continuing value are to be captured into Council's corporate records management system, including those that:

- contain information relating to the business activities of the Council such as directives, proposals, recommendations, definitions or interpretations from a Council member to another party or vice versa
- are part of an actual business transaction itself, or have policy/procedure implications, or are otherwise identified as being significant to the conduct of Council's business, including:
 - a directive or approval for a particular course of action
 - formal communications between internal officers or external agencies
 - final versions of reports
 - policy documents and statements
 - formal minutes of Council Committees.

Working Papers

Working papers are defined as documents, background notes and reference materials that are used to prepare or complete other documents. Final documents are an official record and should be captured into Council's corporate records management system.

Working papers that do not relate to significant decisions or actions, or contain significant information, and where the final document has been captured into the Council's corporate records management system have no continuing value and may be destroyed when reference to them ceases.

Working papers which document significant decisions, reasons and actions, or contain significant information (even if that information is not contained in the final form of the document) have continuing value and are to be captured into the Council's corporate records management system.

Telephone and Other Verbal Communications

Council employees may have telephone or other face-to-face conversations at any time on a variety of matters. Some conversations may involve the relay of information, or involve matters of significance to the conduct of Council business. These conversations should be documented in an appropriate format (eg a file note).

Other conversations may only be basic or routine in nature, such as the issuing or receiving of basic instructions or information, and need not be documented.

Documentation of conversations which involve the exchange of routine or simple administrative instructions or information or that does not relate to Council business, have no continuing value and may be destroyed when reference to them ceases. Original notes of significant conversations that have been transferred or transcribed into appropriate formats for incorporation into Council's corporate records management system will also have no continuing value and may be destroyed when reference to them ceases.

Conversations that have continuing value and should be documented in an appropriate format and captured into Council's corporate records management system are those which:

- relate to the business functions of Council involving the issuing of directives, proposals, recommendations, definitions or interpretations from the Elected Member to another party or vice versa or that are part of an actual business transaction itself
- have policy/procedure implications, or otherwise identified as being significant to the conduct of Council business.

Social Media

Records created on Council social media sites (eg Facebook etc) deemed to be official in accordance with the definitions above, must also be captured into Council's corporate records management system. In regards to retention and disposal, Council uses the same record classification schemes and record disposal schedules for social media that they would use if the information was distributed as a letter or an email.

Capture of social media records into the records management system can be done in a variety of ways. The Information Management Service Area will advise the method that best captures social media interactions. At all times, a risk-based approach to the capture of social media will be used to ensure adequate recordkeeping.

Lobbying

Lobbying is the activity of ratepayers, members of the community or one or more Elected Members to inform or influence the Council through representations to Elected Members. Records such as correspondence or petitions relating to lobbying matters, regardless of whether it is of Council or community interest, have continuing value and should be captured in Council's corporate records management system.

Election Material

Election material and/or records created and/or received by Elected Members in regard to electioneering are private records of the Elected Member, and do not need to be forwarded to the Council for recording in the Council's records management system.

Any record created or received by the Council that relate to the preparation or administration of elections have continuing value and are to be captured into Council's corporate records management system. Such records include:

- public notifications
- nominations
- ballot papers
- vote cards
- postal votes
- how to vote cards
- arrangements
- requests, eg postal votes
- declaration of eligibility
- polling stations.

Delegations

Council acknowledges that the Chief Executive Officer may sub-delegate matters related to this Policy to staff or other persons employed or engaged by council.

Availability of Policy

This Policy will be available for inspection at the Council's offices during normal business hours and on the Council's website www.alexandrina.sa.gov.au. Copies will also be provided to interested members of the community upon payment of a fee in accordance with Council's Schedule of Fees and Charges.

Attachment A: General Disposal Schedule 32

I acknowledge that I have read and understood the Information Management Policy, the General Disposal Schedule No. 32 (Attachment A) and my responsibilities regarding information and records management within the Alexandrina Council business environment.

Signed:

Print Name:

Date:

ATTACHMENT A

General Disposal Schedule (GDS) No. 32

Introduction

On 12 November 2012, the Prime Minister of Australia announced a Royal Commission into the Institutional Responses to Child Sexual Abuse in Australia (the Royal Commission).

On 7 March 2013 the Governor of South Australia issued an equivalent and concurrent instrument to establish the Royal Commission in South Australia. As a result of the announcement of the Royal Commission, State Records of South Australia in consultation with Crown Solicitor's Office developed GDS 32 Records of Relevance to the Royal Commission into Institutional Responses to Child Sexual Abuse, which was approved by the State Records Council and effective from 27 March 2013.

GDS 32, in effect, places an immediate destruction freeze on records of relevance (or likely relevance) that have been sentenced as temporary under another disposal schedule.

Penalties for the unauthorised destruction of records is specified in various legislation, including the *State Records Act 1997* and the *Royal Commission Act 1902*.

The records of Council that have or may have relevance to GDS 32 will be retained in accordance with the requirements of GDS 32 (until 31 December 2023 and for any additional period determined by a review).

Complete and accurate records will be created and managed where they relate to processes that identify the existence, location and attendance of Council employees, and Elected Members.

This not only relates to situations where council provides programs specifically to children and vulnerable people (disabled adults and the elderly), but also includes all occasions where Council Employees and Elected Members may have contact with children on council properties. This is not limited to just publicly accessible areas, but includes properties and areas of buildings where public access is restricted.

Complete and accurate records will also be created and managed where they relate to programs that are provided for or attended by children.

This Policy and internal procedures apply to the management of the records of Council, regardless of their content or purpose. As directed in this Policy and internal procedures, records must be captured into the corporate records management system, on creation or as soon as practicable after creation, to ensure they can be managed and accessed from within the one corporate records management system where possible.

Records Affected By GDS 32

The following temporary retention records may of relevance to GDS 32. This list is not exhaustive, but articulates those records of council that could be required by the Commission or investigators or that place a Council Employee or Elected Member, at a particular location and identifies when that occurred. It also identifies records where specific services are provided to children or vulnerable people.

Employees

The following records relating to all employees of Council may be relevant to GDS 32:

- Register of employees
- Personnel records
- Time sheets / Time records
- Leave records

- Workers compensation claims
- Rehabilitation records
- Counselling, mediation and discipline records
- Travel arrangements
- Diaries
- Rosters (final accurate version)
- Contracts
- Attendance at events internal and external to council
- Apprenticeship records
- Internet Use Logs.

Elected Members

The following records relating to all Elected Members of Council may be relevant to GDS 32:

- Attendance at events internal and external to Council
- Diaries
- Elected Member personnel records
- Leave of absence.

Volunteers

The following records relating to all volunteers of Council may be relevant to GDS 32:

- Volunteer register
- Volunteer personnel files
- Sighting of police clearances
- Absence records
- Sign in and out sheets
- Rosters (final accurate version)
- Incident reports
- Compensation claims.

Contractors

The following records relating to all contractors providing services to Council may be relevant to GDS 32:

- Contracts
- Sign in sheets
- Asset maintenance schedules identifying when contractors have accessed council's sites
- Contract registers.

Program Records

The following records relating to the programs provided by Council may be relevant to GDS 32:

- Work experience students (attendance and location within council)
- Program registration forms
- Attendance records
- Program Plan/Content (Library, Community Centres, Sports and Recreation, Swimming Pool)
- Client/Case files
- Immunisation records
- Internet use by the public on council property.

Facilities Records

- Hire forms

Contracts / Leases / Licences.

Events Records

Contractors used at Council events
Council Employee records
Nature of Event
Attendance (where possible).

Council Services and Facilities Provided

The following services and facilities are provided to the community and may involve Council Employees to have contact with children and vulnerable adults:

Council offices
Libraries
Signal Point Gallery and South Coast Regional Arts
Goolwa Sports Stadium
Community Centres
Visitor Information Centre
Swimming Pool Centres
Community Connect

Management of Destruction Freeze

Physical Records

On the application of GDS40 to the inactive hard copy records of council (this does not include source records), those records that are of temporary retention and relate to GDS 32 will be identified as requiring retention until 31 December 2023 and for any additional period determined by a review. This will be identified on the boxes they are contained within and in the temporary destruction listing document created when the files are identified.

Records in Corporate Records Management System

Where files in the Corporate Records Management System are assigned temporary retention from GDS40 and the records within those files relate to GDS 32, the electronic file will identify its disposition. Files already in the Corporate Records Management System will require the application of GDS 32 where appropriate.