

1. Organisational

1.6. RCM Records Management Policy

This policy must be read in conjunction with Riverina Conservatorium of Music (RCM) Organisational Policies General Outline, Definitions and Relevant Legislations.

1. Purpose

- a. The Riverina Conservatorium of Music (RCM) recognises that good record-keeping supports the RCM's business needs, compliance requirements under legislative frameworks, and the interests of stakeholders.
- b. The RCM is required to comply with the State Records Act 1998 (NSW) and the standards, policies and guidelines issued under it.
- c. The RCM implements and maintains good record-keeping practices across all areas and functions of the RCM by implementing the RCM's Records Management Policy.
- d. This Policy specifies records management responsibilities and compliance controls to:
 - i. ensure compliance with the State Records Act 1998 (NSW);
 - ii. ensure efficient and effective records management at RCM;
 - iii. create, capture and maintain full and accurate records for all RCM business activities; and
 - iv. dispose of records in a controlled and compliant manner.

2. Additional Definitions

- a. **Archives:** Records that have been selected for retention on the basis of their continuing value for legal, administrative, financial or historical purposes, but that are no longer required for current use.
- b. **Business activities:** Any action that contributes towards RCM's decision-making process or service delivery, including all RCM's functions, processes, activities and transactions.
- c. **Full and accurate record:** A record that:
 - i. accurately documents what was done, communicated or decided, when the action was performed, and who determined the action;
 - ii. clearly specifies how, when and why the record was created;
 - iii. is complete and is protected against unauthorised access, alteration, deletion or loss; and
 - iv. is usable by virtue of being understandable, complete, retrievable and available through time.
- d. **Knowledge management:** A multi-disciplined approach to create, acquire, share and preserve knowledge and corporate history, and the cultural and technical foundations that support them. The aim is to align knowledge processes

with organisational objectives.

- e. **Managing records:** Any action relating to the life cycle of a record, including the storage, assignment of metadata, retrieval, transfer, preservation, and eventual disposal of records.
- f. **Metadata standards:** Structured information that allows system users to enter records into the RMS consistently and accurately, and in a manner that allows easy record retrieval.
- g. **Record:** Information in written, printed or electronic form that provides evidence of the business activities of the RCM. A record may include, but is not limited to, any staff member's paper-based records, emails, or electronic documents stored at RCM or on RCM equipment. A record does not include personal and/or private documents that are not part of official RCM business.
- h. **Records Disposal:** Any method of removing records from the RCM's Records Management System through an approved process, such as archiving or destruction.
- i. **Nominated Records Officer:** The Nominated Records Officer (NRO) has overall responsibility for RCM's Records Management Program. The NRO at RCM is the Director (CEO) or delegate. In the absence of the RCM's Director (CEO) or delegate the NRO position defaults to the RCM's Deputy Director Finance and Administration (DDF&A).
- j. **Records Management System (RMS):** The process by which records are stored. The RCM will utilise physical and electronic systems, under the control of the RCM CEO and the Head of the Finance and Administration Department. For the purposes of this policy the RMS consists of:
 - i. Financial records
 - ii. Business records
 - iii. RCM Safe Storage Area – for all physical records to be stored for a defined period.

3. Application of Policy

- a. This Policy applies to all records of corporate value created or processed during business activities at the RCM, including, but not limited to, student records, research records, staff records, business and marketing records, and financial records.
- b. This Policy applies to all business activities of the RCM conducted within and outside of Australia.
- c. This Policy applies to the creation, management, storage, retrieval and disposal of records by all RCM staff.

3.1 Roles & Responsibilities

- a. **RCM Director (CEO)** is the RCM's Nominated Records Officer (NRO) and is

responsible for:

- i. Implementing and supporting a culture of strong records management compliance throughout RCM; and
- ii. Providing final authorisation of record access.

b. RCM Deputy Director Finance and Administration is responsible for the coordination and maintenance of RCM's Records Management System, including:

- i. development and review of record-keeping policies and associated procedures and standards;
- ii. provision of training for the RCM's Staff in the use of the RCM's RMS.
- iii. providing advice on, undertaking and authorising record disposal activities in accordance with Retention and Disposal Authorities issued under the State Records Act 1998 (NSW); and

c. RCM Personnel

- i. All RCM staff have a responsibility to be aware of and comply with the RMS and their responsibilities under it. This includes attending training or completing online training as required by the RCM.
- ii. Staff are responsible for ensuring that records supporting and documenting their business activities are created and captured in line with the provisions of this policy and record-keeping procedures.
- iii. Staff must also be aware of and comply with data protection principles, privacy, and confidentiality requirements specified in relevant legislation and the RCM Code of Conduct.

d. RCM Board of Management

- i. The RCM Board of Management will provide oversight on all aspects of this policy.
- ii. The RCM Board of Management, at the Chair's discretion, will meet as required in order to ensure all aspects of this policy have been managed in accordance with policy and legislative requirements by the RCM Director (CEO) and personnel.

4. Details

- a. The RCM shall have a Records Management Program that complies with the requirements of the State Records Act 1998 (NSW) and associated standards, policies and guidelines.
- b. The Records Management Program shall be implemented across all RCM business activities. The Records Management Program and RCM's business activities may be subject to internal/external monitoring and auditing to ensure ongoing compliance.

- c. Record-keeping requirements shall be embedded within RCM procedures and plans including any Quality Management Systems.

4.1 Record Creation

a. Defining Records

A record shall be saved into the RMS:

- i. if the record is prepared, received or used in the course of the RCM's business dealings; including (but not restricted to):
 1. Student records
 2. Staff records
 3. Legal records
 4. Financial records
 5. Records likely to be reviewed or audited
- ii. the record is written, received or used in the course of the RCM's Board of Management's dealings;

b. Creating Records

- i. Records shall be created and indexed as close to the commencement of a business activity or issue as practicable to assist the capture of a full and accurate record.
- ii. Where records are not indexed into the RMS on creation they shall be stored in accordance with the physical storage requirements outlined in this Policy until they are entered electronically.
- iii. To preserve the integrity of RCM's records, no additions or alterations shall be made to an existing record. If additions or alterations are required, a subsequent record shall be created and added using the same metadata principles.

c. Electronic Record-keeping

- i. All electronic records within the RCM shall be stored within the RMS.
- ii. The use of other electronic systems to capture and manage records in an electronic format must be approved by the NRO or delegate to ensure compliance with NSW state legislation requirements.
- iii. If the business unit is unable to access the RMS, records should be managed in accordance within the physical storage requirements outlined in this Policy.

d. Electronic mail (Email)

Email correspondence is an official record where it is used to document the business activities of the RCM. All emails must be stored within the RMS including all previous threads and relevant attachments to ensure it is a full and accurate record.

e. Ownership, Custody and Control of Records and Archives

All records created or received by staff utilising RCM email accounts and/or in the course of the RCM's operations and activities are owned by RCM unless otherwise specified under contract. Regardless of the ownership of records, any record created, accessed and/or stored by the RCM must be managed pursuant to this policy.

4.2 Record Storage and Classification

a. Storage systems

- i. All RCM records must be stored within the RMS in accordance with the State Records Act 1998 (NSW) and related RCM policy documents.
- ii. Where records are stored in databases/systems other than the RMS, such storage must be approved by the NRO or delegate.

b. Record Security Assignment

- i. Where records cannot be stored in the RMS the records must be secured by other means, either through password protection or locked filing cabinets with access procedures.
- ii. All physical files must be stored in accordance with the physical storage requirements outlined in this Policy.

c. Physical storage locations and security

- i. Physical records must be stored in a secure area with access only provided to authorised staff.
- ii. Where records are stored with an individual employee they shall be made available to authorised users at all times.
- iii. Current records shall be stored within the RCM department that is responsible for the records.
- iv. Non-current records shall be indexed into the RMS and destroyed or stored as archives in accordance with the RCM's Records Management Policy.
- v. Records identified as RCM historical archives shall be stored in the RCM's RMS archives or stored in other secure areas in consultation with the RCM's NRO.
- vi. No physical records are to be stored outside RCM controlled premises without prior approval from the NRO or delegate.

d. Legal Records

- i. All RCM legal records must be stored at the RCM within the RMS either physically or electronically. These include, but are not limited to:
 1. Letters
 2. Contracts
 3. Deeds
 4. Grant Agreements
- ii. All legal records shall be stored in the RCM's RMS archives or stored in a secure area in consultation with the RCM's NRO or delegate.

4.3 Access to Records

a. Security Classification

Security Classification of RMS documents are as follows:

- i. General RCM: This security classification is a default security classification and indicates that a file can be accessed by all RCM staff.
- ii. Secure: This security classification is assigned by the RCM and is only accessible by the RCM's NRO or delegate.

b. Access to Records by RCM staff

- i. Staff may only access records for which they have a legitimate need in the capacity of their employment with RCM.
- ii. Staff may request to see their own employee record, this includes after an employee has ceased employment. Please refer to the RCM Disclosure of Employment Records Policy for more information.
- iii. Access to records other than those classified as General RCM requires prior approval from the RCM's NRO or delegate.

c. Access to Records by external parties

- i. Access to records shall not be provided to parties external to the RCM unless authorised by the RCM Board of Management, the RCM's NRO or delegate, or where required by law.

d. Access to Records via Subpoena or Warrant

- i. Requests for access to RCM records via subpoena or legal warrant is to be managed by the RCM's Director (CEO) only, under relevant legal advice.
- ii. No information should be supplied in reply to the subpoena or legal warrant without relevant legal advice.
- iii. Any information or record under request must not be destroyed.

e. Access to Records via the Government Information (Public Access) Act

(GIPA Act)

- i. Access to records via application under GIPA legislation is to be managed by the RCM's Director (CEO) only, under relevant legal advice.
- ii. Any request for information under the GIPA legislation is to be managed by the RCM's Director (CEO) only, under relevant legal advice.

4.4 Disposal of Records

a. Temporary Records Retention

- i. Records must be retained for the minimum retention timeframe as specified in the general retention and disposal authorities issued under the State Records Act 1998 (NSW).
- ii. Any additional retention requirements specified or implied in other legislation must also be satisfied.
- iii. Additional retention timeframes may apply to satisfy RCM's administrative, legal, financial, or historical needs.

b. Records Disposal

- i. Records will be disposed of according to the destruction schedules in the State Records Act 1998 (NSW).
- ii. The NRO is responsible for the destruction of records or referral of records to be destroyed.
- iii. No records are to be disposed of without authorisation of the NRO or delegate.
- iv. Any records that relate to anticipated or current litigation or an anticipated or current request for access must be retained, regardless of any destruction schedule or approved disposal process. Those records will be excluded from any destruction or disposal process. Those records may only be returned to a destruction or disposal process with the written approval of the RCM's Director (CEO) or Board of Management.
- v. Disposal of all records, electronic and physical, must be undertaken in a secure manner in accordance with the State Destruction of Records Guideline.

5. Variations

- a. If a worker is unsure about any matter covered by this Policy, they should seek the assistance of the Executive Team Member(s).

- b. *The RCM reserves the right to vary, replace or terminate this policy from time to time.*

Policy version and revision information

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