



Records Management Program

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Introduction

Icon Water is a territory owned corporation under the *Territory Owned Corporations Act 1990 (ACT)* and therefore must comply with the *Territory Records Act 2002* (the Act). The main purpose of this Act is to:

- encourage open and accountable government by ensuring that Territory records are made, managed and, if appropriate, preserved in accessible form
- support the management and operation of Territory agencies
- preserve Territory records for the benefit of present and future generations
- ensure that public access to records is consistent with the principles of the *Freedom of Information Act 2016*.

The Records Management Program is a formal document required by the Act. It provides a framework for the creation, management and disposal of records to ensure that full and adequate records of business activities will be made and retained for an appropriate period of time. The Records Management Program is supported by the [PO7 Governance, risk and compliance](#) policy, PR07.11 Records Management procedure and supporting documentation.

The General Manager, Governance and Sustainability (General Counsel) is the executive responsible for records management, and the Internal Audit and Quality branch is responsible for operations and continual improvement of records management practices. As required under section 17 (3) of the Act, a copy of the Records Management Program will be submitted to the Director of Territory Records. Once approved, a copy of the Records Management Program will be made available for public inspection, without charge during ordinary working hours, at Icon Water's head office. The document will be considered as a managed document.

Identification of records

Definition

A record is evidence of a business activity and is defined as 'information created and kept, or received and kept, as evidence and information by a person in accordance with a legal obligation or in the course of conducting business'. It includes information in written, electronic or any other form.

Types of records

Regardless of the type of the record, any record created as evidence of a business activity on behalf of Icon Water are records of Icon Water. The types of record formats held by Icon Water include, but are not limited to:

- paper, microfilm, electronic
- documents, files, maps, plans, drawings, photographs
- data from business systems, word processed documents, spreadsheets, databases
- electronic messages
- audio, video.

Examples of the types of records found in Icon Water include:

- administrative records - procedures, registers, forms and correspondence
- financial records - invoices and bank account details
- asset records - system schematics, maps, drawings, manuals and performance data
- project records - correspondence and project documentation

- customer records - customer accounts and complaints
- legal records – contract and agreements.

The information and records held can be separated into four categories:

- Vital records – essential records in any format and contain information that is:
 - essential to the operations and/or survival of the organisation
 - necessary to recreate the organisation's legal and financial position
 - necessary to preserve its claims and rights and those of its stakeholders.
- Corporate records – business records that are important for the effective running of the organisation.
- Ephemeral information – documents which are of such a trivial nature or of such short-term value that they do not support or contribute to the business function of the organisation (e.g. 'with compliments' slip).
- Personal and reference information.

Some records will be retained and preserved as archives. These are records that document:

- the significant policies and actions of the Territory
- the interactions of government with the people and their environment
- the social, political, cultural and economic development of the Territory as it is influenced by government activity.

Business activity analysis

Business activities have been analysed to determine which records, information and data must be captured and kept in order to meet the organisation's business needs, accountability requirements and community expectations. The outcome of this analysis is a business classification scheme, thesaurus of terms and records disposal schedules. These are outlined in turn below.

Business classification scheme

This is a hierarchical scheme for identifying and defining the functions, activities and transactions performed in the conduct of business, and the relationships between them. See attachment A for details.

Thesaurus of terms

This is a controlled vocabulary of terms designed for use in the classifying, titling and indexing of records on creation. The Whole of Government Thesaurus is mandated by the Territory Records Office for use by all agencies as part of their classifying and titling of paper and electronic records. Icon Water will use this information in conjunction with user defined terms and a naming convention to aggregate activities so as to better manage Icon Water records.

Records disposal schedules

These specify how long records are to be retained before being destroyed or retained permanently as a Territory Archive. Records disposal schedules must be approved by the Director of Territory Records Office. The records disposal schedules contain the following elements, which are mandatory under the standard:

- Functions (or keywords) – the function name, and the description of the function. These are consistent with the Whole of Government Thesaurus used to name the record.
- Activities – the activity name and the description of the activity. These terms reflect those in the Icon Water thesaurus.
- Description – a brief description of the records included in each disposal class.

- Disposal Action – the disposal action to be applied to records in each disposal class. This designates what will ultimately happen to the records - whether they are to be destroyed and if so when that destruction is to take place or if they are to be retained as archives.

Capability

The General Counsel is the executive responsible for records management and will provide leadership and guidance to actively promote and support a positive records management culture throughout the organisation. The Internal Audit and Quality branch has operational responsibility for records management. The Manager Internal Audit and Quality is responsible to provide appropriate resources to enable the program to be implemented and maintained. This includes both financial resources through normal budgetary arrangements and human resources.

A site owner has been identified within each branch to assist with communicating information to colleagues about RecordKeeper¹ and records management in general. The site owner will act as a conduit to the Records Team within the Internal Audit and Quality Branch.

Key responsibilities are outlined in Table below:

Role	Responsibilities
Management	<ul style="list-style-type: none"> ▪ Provide leadership, guidance and promote a positive records management culture. ▪ Provide resourcing to build records management capability and maturity. ▪ Report on records management implementation in Whole-of-Government annual reporting.
Site Owner	<ul style="list-style-type: none"> ▪ Promote records management practices within their branch. ▪ Manage and maintain RecordKeeper sites including access permissions. ▪ Liaise with the Records Team on records management information and communicate messages about records management practices to their branch. ▪ Participate in records management training. ▪ Conduct regular health checks on metadata to ensure a high quality of information is being maintained. ▪ Address record related issues or concerns (if any) from their branch with the Records Team.
Workers	<ul style="list-style-type: none"> ▪ Consider good record keeping practices as a normal part of everyday business. ▪ Make and keep full and accurate records as evidence of business activities and comply with relevant records management procedures and work instructions. ▪ Participate in records management training to obtain required skills.
Records Team	<ul style="list-style-type: none"> ▪ Implement RecordKeeper sites across Icon Water to support compliance with the Territory Records Act and to improve efficiency of records management practices.

¹ The RecordKeeper is a SharePoint Collaboration site that is integrated with the Icon Water's electronic documents and records management system (EDRMS) Records365.

	<ul style="list-style-type: none"> ▪ Maintain and continually improve RecordKeeper sites and maintain the integrity and authenticity of electronic records and their associated metadata. ▪ Conduct independent health checks to ensure that it continues to comply with regulatory requirements, that it remains relevant to the organisation's needs and to make improvements to the system. ▪ Manage operational activities of physical records (i.e. accept physical documents for storage, manage the storage of physical records, and provide a retrieval service). ▪ Provide records management training as part of induction and refresher training (if required). ▪ Seek assistance, advice and training from the Director of the Territory Records Office as required. ▪ Facilitate public access to records in cooperation with the Freedom of Information Officer. ▪ Review and update the Records Management Program.
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The implementation and effectiveness of the Records Management Program will be monitored through a number of performance measures.

- Team Leader Quality and Records Management will conduct maturity assessment using the Compliance Checklist Tool provided by the Territory Records Office and report once every two years to the Director of Territory Records on its records management capabilities.
- The Records Management Program will be reviewed not less than every five years.

Metadata

Records need to be described so that they can be accessible, reliable, usable and understandable when required as evidence of business activity. This description process happens when the record is made by assigning metadata. Providing descriptive and meaningful metadata ensures that records remain searchable, accessible, usable and retrievable when required.

Icon Water records contain the specified metadata fields below to ensure that records are adequately defined, which incorporates the mandatory minimum record keeping metadata set out by the Territory Records Office.

- Author (Originator) – person who created the record
- Assignee – person with whom the record currently resides only for physical records
- Container – e.g. a document inside a file; a file inside a box
- Created by – automatically generated when a record is created
- Name (Title) – a meaningful record title to allow a record to be easily retrieved
- Date closed – automatically generated date after a file is closed
- Date created – automatically sourced from the metadata and imported into RecordKeeper
- Disposal date – automatically generated from the applicable disposal schedule trigger
- Disposal action – automatically generated from the applicable disposal schedule
- Date modified – automatically generated when a record is changed
- Modified by – automatically generated when a record is modified

- Record number – generated automatically assigns a unique, non-repeatable identifier to each included record
- Record status – e.g. active, inactive, archived, destroyed
- Location – the physical location that the record resides
- Description – summary of the contents – useful to add notes about the record container
- Business group – represents the group responsible for the record (e.g. Infrastructure Services, Finance and Strategy, etc)
- Record category – e.g. vital metadata identified based on the business classification scheme
- Record type (content type) – e.g. record, file, box
- Disposal class – provides for records being disposed of in accordance with disposal schedules
- Security classification – identified in the EN09.00.12 System Information Categorisation Standard
- Media type – e.g. electronic, physical
- Version – a variation of a previous copy

In order to protect the authenticity and reliability of the information, data and records, the metadata will be managed to a high standard. This will be achieved by providing comprehensive training to all staff on the importance and appropriate use of metadata. Mandatory metadata will also be required on all records and site owners will conduct regular health checks to ensure that the metadata entered is appropriate.

All RecordKeeper sites are configured and integrated with the EDRMS to ensure all mandatory metadata are captured during site creation as defined in the work instruction WI07.11.02 Create RecordKeeper Sites.

Protection of records

Records, information and data must be managed to ensure that they are appropriately accessible for as long as required. Protection of records encompasses many aspects including storage and handling, security and access controls, preservation planning, outsourcing controls, digitisation and migration, and business continuity management. This is supported by the EN09.02.02 ICT information security policy,

Storage and handling

Physical records are stored at a number of locations within Icon Water, including:

- Mitchell office
- Fyshwick
- Lower Molonglo Water Quality Control Centre (LMWQCC)

Records are also stored off-site with an outsourced service provider. The service provider provides a cataloguing service that allows records to be located quickly and easily. The service provider also delivers records as requested by Icon Water. The Director of Territory Records has been notified of the contract arrangements with the service provider for the provision of physical storage of records for Icon Water as per clause 16 (2) (c) of the Act.

Both internal and external storage facilities have adequate access to records and security controls, are protected from pests, and have fire alarms and fire control systems in place.

The process for storing business records in RecordKeeper sites or in physical hardcopy files is defined in the work instruction WI07.11.03 Store Business Records.

The process for retrieval of business records in RecordKeeper sites or in physical hardcopy files in defined in the work instruction WI07.11.05 Retrieve Business Records.

Security and access controls

Records are maintained in a secure environment to ensure that the integrity of the records is not compromised. Only users with Icon Water logins are able to access active internal RecordKeeper sites. Based on the Collaboration site permission model, the RecordKeeper active site has the following levels of access permissions for users:

- Owner – Full control – Records team, Icon Water ICT
- Member – Edit access
- Visitor – Read access

Access to EDRMS (Records365) is restricted to those with records management responsibilities within the Internal Audit and Quality branch to ensure that records are protected from unauthorised destruction.

Internal storage facilities at the Mitchell and LMWQCC offices and facilities at Fyshwick have swipe card access which is restricted to selected users.

Preservation planning

Icon Water focuses on keeping records useable for as long as they are required. All records stored in RecordKeeper sites are backed up in such a way that the records can be maintained as reliable and authentic evidence over time. Records will be routinely monitored in order to identify any formats that are at risk of becoming obsolete. Migration of records will be planned, quality controlled and documented.

Long term value and archival records will be digitised and migrated into stable long term readable electronic format to ensure that they do not become obsolete while they are being retained beyond their period of active use. The process for digitisation is defined in the work instruction WI07.11.10 Provide Digitisation Services.

Records identified as territory archives require particularly careful management to ensure that they remain accessible, useable and understandable in perpetuity. Physical records identified as territory archives and records that are not regularly required for the operations will be stored at the service provider's site. The archival process is defined in the work instruction WI07.11.04 Archive Business Records. The storage environment conditions include following controls:

- humidity and temperature controls
- UV filtered lighting
- heat or smoke detections, fire alarms, sprinkler systems and fire extinguishers
- security monitoring alarms and controlled access
- appropriate housing including shelving and packaging material.

After 25 years, any record designated as 'retain as permanent record' may be returned to the Territories Records Office. The decision to return a record to the Territory Records Office will be made based on a cost benefit analysis of storage costs and management of records.

Digitisation and migration

When converting a physical record to a digital alternative, the process is known as 'digitisation'. Digitisation can be undertaken to either help preserve the original document or to facilitate access. Digitisation of physical records will be a phased approach based on business priority and disposal schedules. Business areas will analyse their records to determine whether records require digitisation. When planning digitisation of physical records, the following issues will be considered:

- establish the purpose, planning and justification for digitising
- determine the right approach to digitisation
- ensure the correct tools and technical standards are used for digitisation
- management of source records after digitisation.

Migration is the process of moving digital information assets from one form of software to another. Migration is required for digital records, information and data that are stored or managed in systems that are being upgraded or decommissioned. Migration of digital assets will require extensive planning and technical expertise. The process for digitisation is defined in the work instruction WI07.11.10 Provide Digitisation Services.

Business continuity planning

In the event of a disaster, access to information, data, records and associated systems will be required for business to continue. Particular information assets are considered essential to re-establish operations. These systems are identified in the enabler EN07.03.02 Business Continuity Plan, along with the maximum allowable outage time. Back-up of electronic information is also conducted regularly.

Retention of records

Decisions about the retention of records, information and data are guided by the implementation of the records disposal schedules and approved normal administrative practices.

Records disposal schedules

Records disposal schedules provide details on how long records should be kept to meet business needs and can authorise two main actions:

- Retain as territory archive – information, data and records of significant and enduring value to the ACT Government and the community
- Destroy – information, data and records that can be destroyed after retention requirements have been met and there is no other business need to keep them.

The Territory Records Office has a suite of disposal schedules known as the Whole of Government Records Disposal Schedules which documents whether records should be retained or destroyed once they are no longer required to meet business needs. Disposal schedules relevant to the organisation have been adopted to ensure a consistent approach to the disposal of records across the Territory.

The Whole of Government Records Disposal Schedules listed below have been identified as meeting the requirements of records created and managed at Icon Water.

- Business Development
- Corporate Governance
- Finance and Treasury management
- Government and stakeholder relations
- Human resources
- Information and communications technology
- Property, equipment and fleet
- Records and information management
- Sewerage management
- Solicitor and legal services

- Strategy and governance
- Water management

These disposal schedules have been incorporated into the EDRMS for both physical and electronic records.

Implementing disposal actions for older records is the responsibility of the operational records management staff in conjunction with the Records Team.

Icon Water will take, under advisement, any special actions as deemed required, by the Territory Records Office. This will include a disposal freeze where the Director of Territory Records temporarily suspends the approval of all or part of a records disposal schedule in order to retain records that might have otherwise been destroyed or any other legally mandated action.

Normal administrative practice

Normal administrative practice allows the destruction of ephemeral, duplicate or transitory material to be carried out as part of normal practices and procedures. It is designed to ensure that transitory material can be disposed of without the need for formal records disposal schedule coverage in order to improve business efficiency without risk to accountability. Normal administrative practice is not a replacement for approved records disposal schedules.

Material that can normally be destroyed using this method includes:

- working papers consisting of rough notes, calculations, diagrams, etc., used for the preparation of records
- duplicates and copies of documents where the original is safely retained within Icon Water's RecordKeeper system
- drafts where the contents have been reproduced in a final document
- facilitative items such as personal emails, appointment diaries or calendars
- modifications and updating of data as part of running of established electronic software programs, where such processes do not result in the loss of data of continuing value
- published materials used as reference only including pamphlets, leaflets and brochures
- information from other organisations which is not essential to Icon Water's functions
- personal materials such as invitations, tickets, brochures etc.

Users can delete these items from the RecordKeeper sites by using SharePoint 'Delete' functionality and the EDRMS will recognise these deletions as NAP deletions and an audit trail will be maintained. This will then be managed by the Internal Audit and Quality branch.

Authorised destruction of records

Once records, information and data have been identified for destruction, the actual destruction should be approved and securely undertaken.

Icon Water will:

- use only current, approved record disposal schedules to authorise the destruction of records
- ensure that records disposal schedules are correctly applied to records
- ensure all sentencing decisions are recorded and retained
- ensure relevant metadata is retained in recordkeeping system for each record
- ensure that sentencing staff are appropriately trained and supervised.

Records approved for destruction will be disposed of securely and the information contained in the records will not be retrievable following destruction. The process for destruction of business records is defined in the work instruction WI07.11.06 Destruction of Business Records.

Table 1 shows the methods of endorsed destruction in alignment with environmental principles.

Table 1. Methods of endorsed destruction

Type of record	Methods of destruction
Physical and hardcopy records	Locked bins, the contents of which are pulped.
Digital records	Erase
Optical media e.g. video, photo, microfilm	<ul style="list-style-type: none"> ▪ Cutting ▪ Crushing
Hard disks e.g. laptops, computers, shared drives	<ul style="list-style-type: none"> ▪ Reformatting ▪ Degaussing ▪ Erasure
Low-cost media e.g. CD-ROM, DVD, floppy disk	<ul style="list-style-type: none"> ▪ Disintegration ▪ Cutting/crushing ▪ Shredding
Business information systems and electronic document and records management systems (EDRMS) back-up media e.g. back up tape	<ul style="list-style-type: none"> ▪ Degaussing ▪ Overwriting

Public access

Icon Water promotes a culture of openness, transparency and accountability in relation to records information and data. The *Territory Records Act 2002* provides for a general right of public access to records to meet the obligations of government to "support accountability and democratic government and to enrich the community through a source of cultural and collective memory". This allows the public to access records that are more than 20 years old. Icon Water will take reasonable steps to assist a person to make a request for access to records as per the relevant procedure.

Under Section 28 of the Act, Icon Water may apply to the Director of Territory Records to have records containing sensitive information exempt from public access. These are provisions from the *Freedom of Information Act 2016* and relate to records:

- affecting relations with the Commonwealth and States
- affecting enforcement of law and protection of public safety
- affecting personal privacy
- subject to legal professional privilege
- disclosure of which would be in contempt of the Legislative Assembly or a court.

When such a declaration applies, there is no entitlement to access the record under provisions of the Act however, access may be permitted under the *Freedom of Information Act 2016*. Icon Water will seek to have the following records exempt under section 28 of the Act:

- Personnel - employment conditions
- Financial management - salaries
- Compensation - cases
- Personnel - salaries
- Commercial - commercial contracts

A review will be conducted of the records to which a section 28 declaration applies at regular intervals as described in the procedure PR07.13 Freedom of Information.

Business systems

Icon Water is committed to managing records regardless of the format of those records. In order to comply with the Act, Icon Water has implemented RecordKeeper sites using collaborations sites in SharePoint which integrates to the electronic documents and records management system.

Key business systems containing records

There are a number of systems that contain business documents. A RecordKeeping assessment tool (FO07.11.01.02) is used to assess the suitability of the business systems to store/retain business documents and the process is documented in the WI07.11. 07 Assessing business systems for record keeping. The business systems that are identified as record keeping systems and the assessment details are stored in a SharePoint list. Any system containing business records will be assessed to identify if they are intrinsically records compliant. The assessment will identify whether they can be linked with the records management system or if their records can be easily migrated to the new system. Any work that is required to make a system compliant, whether that be changing the system itself, or linking it to the records management system, is the responsibility of the system owner to facilitate and resource in consultation with the Records Team.

Each of the records contained within a compliant business system is managed and will be disposed of according to the nature of the record. For example, some systems contain predominantly sewerage records and these types of records will be managed in accordance with the sewerage management records disposal schedule.

Compliance

As required under section 17 (3) of the Act, a copy of the Records Management Program will be submitted to the Director of Territory Records. Once approved, a copy of the Records Management Program will be made available on the Icon Water website.

Icon Water will request assistance, advice and training from the Director of the Territory Records Office as required.

The Director of Territory Records has been notified of the contract arrangements with the outsourced service provider for the provision of physical storage of records for Icon Water as per clause 16 (2) (c) of the Act.

Icon Water will conservatively manage any records that contain information that may allow people to establish links with their Aboriginal or Torres Strait Islander heritage. These records will only be disposed of after consulting with the Territory Records Advisory Council.

Icon Water is committed to providing assistance to the Director of Territory Records to examine the operation of the Records Management Program and compliance with the Act and the program. The Manager Internal Audit and Quality will liaise with the Director of Territory Records to assist with any examination and manage any disputes regarding compliance.

The General Counsel will report to the Territory Records Office regarding the organisation's compliance with the Act and the Records Management Program as required.

References

IMS References

PO7 Governance, Risk and Compliance Management Policy

PR07.11 Records Management Procedure

PR07.13 Freedom of Information

EN07.12.01 Icon Water Privacy Policy

EN07.11.03 Icon Water Business Classification Scheme

EN09.02.02 ICT Information Security Policy

EN07.03.02 Business Continuity Plan

EN09.00.12 System Information Categorisation Standard

WI07.11.02 Create RecordKeeper Sites

WI07.11.03 Store Business Records

WI07.11.04 Archive Business Records

WI07.11.05 Retrieve Business Records

WI07.11.06 Destruction of Business Records

WI07.11. 07 Assessing Business Systems for Record Keeping

WI07.11.10 Provide Digitisation Services

FO07.11.01.02 Business System Assessment Tool for Recordkeeping

FO07.11.01.01Data Destruction/Decommission Authorization Request Form

Other references

Territory Records Act 2002

Freedom of Information Act 2016

Privacy Act 1988 (Cth)

Whole of Government Records Disposal Schedules

AS/NZS ISO 9001:2015 Quality Management Systems- Requirements

ISO 14001:2015 Environment Management Systems– Requirements with Guidance for Use

AS/NZS 45001:2018 Occupational Health and Safety Management Systems – Specification with Guidance for Use

AS ISO 15489.1 – 2002 Records Management – Part 1: General

Appendix A – Business classification scheme

The following functions are incorporated in the Business Classification Scheme (known as File Plan) in the electronic documents and records management system:

- Business Development
- Corporate Governance
- Finance and Treasury management
- Government and stakeholder relations
- Human resources
- Information and communications technology
- Property, equipment and fleet
- Records and information management
- Sewerage management
- Solicitor and legal services
- Strategy and governance
- Water management