

Sydney Opera House Policy

Title:	Records Management Policy
Policy Number:	SOH137
Effective Date:	02 July 2019
Authorisation:	Chief Executive
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Superseded Policy:	Records Management Policy
Accountable Executive:	Executive Director, Corporate Services & CFO
Responsible Officer:	Information Manager

1. CORE PROPOSITION

This policy establishes a Records Management Framework (the Framework) for the creation, capture, control, use, maintenance and disposal of Sydney Opera House records. The Framework enables the Opera House to maintain a strategic, structured and consistent approach to recordkeeping in line with the *State Records Act 1998 (NSW)* (the Act) and the standards it sets out.

2. SCOPE

- 2.1. This policy covers Opera House records in all forms.
- 2.2. This policy is relevant to all Opera House business areas and applies to all employees (including permanent, temporary and casual employees), contractors and persons engaged to undertake work for the Opera House.
- 2.3. This policy must be reflected in contracts with third party service providers regarding management of Opera House information assets and the records this will entail, as set out at section 6.
- 2.4. This policy should be read in conjunction with other SOH policies, procedures and guidelines available via Intouch that provide more detailed information in relation to specific recordkeeping issues, including the:
 - *Information Security Management System (ISMS) Policy;*
 - *Information Classification Policy;*
 - *Privacy Management Policy and Plan;*
 - *Access to Information (GIPA) Policy;* and
 - Records management procedures.

3. DEFINITIONS

- 3.1. **Appraisal** – the process of evaluating business activities to determine which records need to be captured and how long the records need to be kept, to satisfy legal obligations and meet business needs, accountability and community expectations. Appraisal decisions include records retention, destruction or transfer to State Archives.
- 3.2. **Digital recordkeeping systems** – information systems with recordkeeping functionality which ensures authenticity, reliability, integrity, useability and access of records over time.
- 3.3. **Disposal authority** – instrument defining the disposition actions (i.e. retention periods) that are authorised for specified records by the Board of State Records & Archives NSW (*ISO 15489 1*).
- 3.4. **High risk and high value records** – those records related to the core business of the Opera House (as set out in the *Sydney Opera House Trust Act 1961 (NSW)*). They have enduring value and significance to the organisation and broader community.
- 3.5. **Records** – physical and digital information created, received, and maintained as evidence and as an asset by an organisation or person, in pursuit of legal obligations or in the transaction of

business, such as emails, voicemail messages, handwritten notes, social media posts and metadata.

- 3.6. **Records Management Framework** – this policy, the supporting procedures and guidelines and other projects and strategic documents that set out how the Opera House meets its records and information management obligations in accordance with the Act and other legislation, policies, standards and requirements issued by the NSW Government.
- 3.7. **State archive** – any state record that the NSW State Archives and Records Authority has control of under the Act.
- 3.8. **State record** – any record, made and kept, or received and kept, by any employee in the course of the exercise of official functions at the Opera House, for any purposes of the Opera House, or for the use of the Opera House.

4. RECORDS MANAGEMENT FRAMEWORK

- 4.1. Opera House records are valuable business assets. They form the organisation's corporate memory, ensuring information is captured and utilised to:
 - Support strategic and daily operations;
 - Meet legal obligations; and
 - Maintain state, national and world heritage values.
- 4.2. Management of all Opera House records, regardless of format and across all operating systems and physical locations, must be carried out in accordance with the Framework.
- 4.3. The Opera House will use the Framework to implement, monitor and review recordkeeping systems in order that full and accurate records of operations, outcomes and decisions are:
 - Routinely created and managed as part of normal business practice;
 - Maintained and protected from unauthorised or unlawful access, destruction, loss, deletion or alteration, in line with legal and business requirements; and
 - Retained or disposed of appropriately, securely and in a timely fashion in line with the disposal authorities.

5. HIGH RISK AND HIGH VALUE RECORDS

- 5.1. Records and information management must be a designed component of all Opera House systems and service environments where high risk and high value business is undertaken.
- 5.2. High risk and high value records will be:
 - Identified and preserved across all Opera House systems and service environments;
 - Sustained through system and service transitions by strategies and processes specifically designed to support the function of the organisation and accountability; and
 - Maintained as cultural resources through timely transfer to State Archives.

6. THIRD PARTY SERVICE PROVIDERS

All contractual engagements with third party service providers must incorporate compliance with the Framework. Agreements must take into account retention and disposal requirements for records held in providers' systems and migration of data and records to a digital recordkeeping system when information systems are decommissioned.

7. LEADERSHIP AND SUPPORT

- 7.1. A Senior Responsible Officer will be appointed by the CEO to oversee operation of the Framework and SOH's compliance.
- 7.2. Training and ongoing guidance in the application of the Framework will be available to all employees, including materials available on Intouch and support from the Information Management team.

8. ROLES AND RESPONSIBILITIES

8.1. **Anyone who creates a record for the Opera House** is responsible for dealing with the record/s in line with this policy and the Framework.

8.2. The **Records Management Specialist** is responsible for:

- Developing and reviewing records and information management procedures in relation to all aspects of records management;
- Incorporating electronic recordkeeping requirements into operational and maintenance plans;
- Advising the Information Manager on records management issues, including appraisal, disposal and preservation;
- Delivering the records management training program and providing support and advice to all employees;
- Administering the Opera House electronic documents and records management system (EDRMS); and
- Authorising the disposal or destruction of records and undertaking records management operations, including transfer, recall and disposal of records, in line with the Delegations Manual.

8.3. The **Information Manager** is responsible for:

- Developing and implementing records and information strategies to support this policy and the Framework;
- Developing, implementing and regularly reviewing the Framework;
- Maintaining, monitoring and reviewing departmental recordkeeping systems and measuring compliance with the Framework;
- Ensuring migration of digital records is conducted in accordance with the conditions specified in standards issued under the Act and disposal authorities;
- Ensuring that all records are kept and accessible for as long as required by employees, the NSW Government and the public; and
- Authorising the disposal or destruction of records, in line with the Delegations Manual.

8.4. The **Chief Technology Officer** is responsible for:

- Ensuring the EDRMS is available, reliable and accessible to employees as required;
- Ensuring new and existing business systems comply with this policy and the Framework;
- Authorising each approved recordkeeping system, in consultation with Business Managers;
- Providing support and infrastructure to ensure that digital records are managed so they are accessible, readable, protected, complete, comprehensive and authentic for as long as required;
- Developing disaster recovery plans for digital records and maintaining a high-value information assets register; and
- Implementing information security measures including routine and comprehensive backups in line with the ISMS Policy.

8.5. **Directors & Senior Managers** are responsible for:

- Ensuring business units and officers under their management are aware of their responsibility to maintain accurate records and comply with the Framework;
- Ensuring that employees undertake records management training;
- Implementing measures to monitor compliance and address inadequacies in recordkeeping practices;

- Authorising the destruction of records, in consultation with the Information Manager;
- Ensuring records and information management are integrated into work processes, systems and services;
- Consulting with the Information Manager when introducing new processes to ensure that records are captured and remain authentic, complete, accessible and useable;
- Arranging regular internal review of records in business systems and cloud-based solutions. These audits must be conducted by the system owner in consultation with the Information Manager; and
- Determining legislative requirements for records relating to their specific activities through consultation with the Information Manager and/or Legal.

8.6. The **Nominated Senior Responsible Officer** is responsible for:

- Ensuring this policy is regularly reviewed and up to date.
- Representing records and information management interests to the Executive;
- Approving the strategic direction of the Framework and ensuring that it is appropriately resourced;
- Supporting and fostering a culture of good recordkeeping;
- Ensuring that the Opera House adheres to appropriate record retention and disposal requirements; and
- Arranging external audit of systems with high risk and high value records as needed.

8.7. The **Chief Executive Officer** is responsible for:

- Ensuring the Opera House complies with the requirements of the Act and the associated standards and requirements; and
- Nominating the Senior Responsible Officer in charge of recordkeeping.

9. RELEVANT LEGISLATION AND SUPPORTING DOCUMENTS

Copyright Act 1968 (Commonwealth)

Government Information (Public Access) Act 2009 (NSW)

Health Records and Information Privacy Act 2002 (NSW)

Privacy and Protection of Personal Information Act 1998 (NSW)

State Records Act 1998 (NSW)

Standard on records management (Standard No. 12, issued March 2015, amended October 2018)

Standard on the physical storage of State records (Standard No. 13, issued February 2019)

Functional Retention and Disposal Authority: FA402 (NSW)

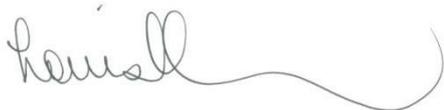
SOH Access to Information (GIPA) Policy

SOH Information Classification Policy

SOH Information Security Management Systems (ISMS) Policy

SOH Privacy Management Policy and Plan

APPROVED



Chief Executive

Date: 02 July 2019