TEACHER QUALITY INSTITUTE RECORDS MANAGEMENT PROGRAM

SECTION 1 – Records Management Program

Introduction

The *Territory Records Act 2002* (the Act) obliges the Chief Executive Officer, Teacher Quality Institute, to ensure the organisation and its staff comply with the Act, including through the development, approval and implementation of this Records Management Program.

Authorisation

In accordance with the *Territory Records Act 2002* (the Act), and as Principal Officer (Chief Executive Officer) of the Teacher Quality Institute (TQI), I

- authorise this Records Management Program
- certify that this Records Management Program addresses all elements contained within section 6 of the *Territory Records Act 2002*
- certify that this Records Management Program meets the requirements set out in the *Standard for Records and Information Governance* released by the Director of Territory Records
- provide a copy to the Director of Territory Records.

This Records Management Program (the Program) provides a framework to ensure records,information and data management requirements are met.
The Program's framework includes:

- *Territory Records Act 2002*
- *Standard for Records and Information Governance* released by the Director of Territory Records
- Other applicable legislation and standards
- other administrative directions of the ACT Government and broader ACT Public Service
- Records Management Program (this document)
- TQI Business Continuity Plan 2020.

I authorise the appropriate resourcing of this Records Management Program, which includes the:

- promulgation of this Records Management Program and the associated framework to allstaff, volunteers, consultants, contractors and outsourced providers
- appropriate management of records, information and data
- annual assessment of records, information and data management capabilities
- planning for, and continual improvement of, records, information and data management capabilities.

Coralie McAlister
Chief Executive Officer
Teacher Quality Institute
Date:

1.1 Compliance

This Records Management Program addresses all elements set out in section 16 of the *Territory Records Act 2002* and meets the requirements set out in *the Standard for Records information Governance* released by the Director of Territory Records.

1.2 Relationship with the Director of Territory Records

Arrangements are in place to liaise with the Director of Territory Records for:

- examining the operations of the Records Management Program and compliance with the

Territory Records Act 2002

- advising on the outsourcing of any aspect of records, information and data management responsibilities
- requesting assistance, advice and training in relation to records, information and data management
- reporting on compliance with the *Territory Records Act 2002*, the Records Management Program, and records, information and data management capabilities
- resolving disputes regarding compliance with the *Territory Records Act 2002* and the Records Management Program.

1.3 Establishment of framework (Strategy Principle)

This Records Management Program is part of a framework to ensure records, information and data management requirements are met by strategically managing records, information and data. The Framework includes:

- a Records Management Program (this document)
- The TQI Records Management Policy
- the TQI Business Continuity Plan 2020
- supporting procedures and guidelines that outline how TQI manages records and complies with the Territory Records (Records, Information and Data) Standard 2016.

1.4 Capability Assessment and Maturity Development (Capability Principle)

The Chief Executive Officer will report annually to Territory Records Office on its records, information and data management capabilities using the ACTPS Records Management Maturity Model and Checklist Tool provided by the Territory Records Office (TRO) or as required by TRO Annual Report Directions.

1.5 Creating and managing full and accurate records (Assess Principle)

TQI works with the Territory Records Office to develop Records Disposal Schedules that identify records TQI must create in order to make and keep full and accurate records of its activities. TQI is committed to processes for identifying its records and their significance that are accountable, consistent, objective, comprehensive, contextualised and documented.

Requirements to create records of the TQI's activities are contained in record keeping procedures and in guidelines.

1.6 Metadata Management (Describe Principle)

TQI complies with recordkeeping metadata standards endorsed by the Territory Records Office. TQI uses the Whole of Government Recordkeeping Thesaurus to classify its records, information and data according to the business functions and activities.

1.7 Protecting Records, Information and Data (Protect Principle)

Arrangements are in place to protect records, information and data. These include ensuring the continued access to records, information and data for as long as they are required to be kept in accordance with the *Territory Records Act 2002* (as defined by records disposal authorities).

Instructions to staff on how to protect TQI's information and data arecontained in TQI's records management procedures and other guidance material. The data and access to data in the Customer Relationship Manager (CRM) system is regularly audited to ensure only authorised access to data occurs. The ACT Government's Digital Data and Technical Solutions Group manages the security of ACT Government's network.

1.8 Records Disposal Arrangements (Retain Principle)

Listed below are records disposal schedules that TQI may need to consult in developing its record disposal schedules. Other records disposal schedules can be found at Territory Records Act 2002 | Acts

Schedule name	Date Effective	Instrument No
Audit Services Records	30 January 2006	NI2006-26
Child and Youth Protection Services Records	14 October 2016	NI2016-567
Converted or Digitised Source Records	14 July 2020	NI2020-435
Corporate Governance Records	5 January 2009	NI2009-10
Disaster Recovery (Human Services) Records	3 May 2005	NI2005-157
Education Strategy Records	30 August 2013	NI2013-375
Emergency Awareness Records	13 April 2012	NI2012-184
External Education Relations (Non-Government)	30 August 2013	NI2013-374
For preserving records containing information that mayallow people to establish links with their Aboriginal andTorres Strait Islander heritage	25 March 2011	NI2011-162
Finance and Treasury Management Records	27 February 2017	NI2017-83

Schedule name	Date Effective	Instrument No
Government and Stakeholder Relations Records	27 February 2017	NI2017-84
Government Coordination Records	11 September 2007	NI2007-280
Human Resources Records	27 February 2017	NI2017-79
Human Rights and Discrimination Records	1 September 2004	NI2004-335
Industry Long Service Leave Records	12 July 2006	NI2006-256
Information and Communications Technology Records	27 February 2017	NI2017-85
Inquiries & Commissions Records	3 May 2005	NI2005-155
Ombudsman Complaint Management Records	28 February 2011	NI2011-93
Procurement Records	4 October 2007	NI2007-312
Property Equipment and Fleet Records	27 February 2017	NI2017-86
Protection of records relevant to the Royal Commissioninto Institutional Responses to Child Sexual Abuse	22 August 2019	NI2019-543
Protection of records relevant to the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability	22 August 2019	NI2019-542
Public Health Protection Records	26 March 2019	NI2019-161
Records and Information Management Records	27 February 2017	NI2017-87
School Management Records	30 August 2013	NI2013-373
Solicitor and Legal Services Records	27 February 2017	NI2017-88
Strategy and Governance Records	27 February 2017	NI2017-89
Teacher Quality Records	11 October 2018	NI2018-550
Venue & Event Management Records	24 October 2005	NI2005-402
Workplace & Safety Policy Records	28 February 2011	NI2011-96

Additional arrangements are in place to retain records, information and data that may allow people to establish links with their Aboriginal or Torres Strait Islander heritage, and for records, information and data that are to be retained in perpetuity for cultural and historical purposes.

Records sentencing and disposal schedules establish how TQI employees apply records disposal schedules to Territory Records.

1.9 Public Access to Records, Information and Data, and Access Exemptions (Access Principle)

Arrangements are in place to provide public access to records, information and data under the authority of the *Territory Records Act 2002.* These arrangements also allow for the exemption of certain information, data and records assets, and the regular review of the exemption (as defined by section 28 of the *Territory Records Act 2002).* TQI's arrangements for providing public access to records, information and data are based on the following:

- Protection of Aboriginal and Torres Strait Islander heritage establishes how TQI employees identify and retain records that contain information which may allow people to establish links with their Aboriginal and/or Torres Strait Islander heritage.
- Public access to records, information and data and access exemption in accordance with the *ACT Freedom of Information Act 2016* (the FOI Act)

1.10 Implementation, Compliance and Reporting

To monitor compliance with the Records Management Program, performance measures for records, information and data management activities have been established and include:

- information, data and records are created or captured in a full and accurate way and in endorsed locations
- information, data and records are appropriately managed for as long as required
- metadata requirements are implemented
- capability improvement measures are planned and implemented
- Records management is a standing agenda item at the monthly TQI team meeting.
- TQI's Records Management implementation is reported on annually in accordance with current Annual Report Directions issued by the Chief Minister and Cabinet Directorate.

1.11 Availability for public inspection

Once approved, this Program will be published to the TQI website with a notification advising that the complete Program is available for inspection upon request.

> As required under Section 17(3) of the Records Management Act, a copy of the Records Management Program for TQI will be given to the Director of Territory Records immediately after approval of the Program.

1.12 Review of this Records Management Program

A review of this Records Management Program will be undertaken at least every five years or as required.

1.13 Contains a compliant Records Management Policy

> Section 2 *TQI Records Management Program: Records Management Policy* (below) contains the Records Management Policy for TQI.

1.14 References compliant Records Management Procedures

Section 3 The Records Management Procedures of TQI **specify how the policy will be implemented.**

SECTION 2 – Records Management Program **Policy**

2.1 Preamble

The *Territory Records Act 2002* requires ACT agencies to have, and to comply with, a Records Management Program. This policy outlines the Records Management Program for TQI and details how TQI will adhere to the requirements of the Act.

2.2 Agency recordkeeping requirements

The Teacher Quality Institute (TQI) makes, manages and keeps records to support its business needs, legal and regulatory obligations, and broader community expectations. An analysis of these requirements, and an outline of the types of records that TQI must make and keep, is given in TQI's Records Management Procedures (Section 3 below).

2.3 Full and accurate records

It is essential for all staff to make and keep full and accurate records of their activities, to ensure that such records are incorporated into TQI's record keeping system and to comply with all records management procedures.

2.4 Ownership of records

All records made or received by TQI are the corporate property of the agency. All records that staff make, receive and maintain as part of their duties belong to TQI and no records belong to individual employees. TQI retains control of all records required for service delivery in accordance with Standard No.5 – Recordkeeping and Outsourced Government Business.

2.5 Responsibilities of staff in relation to recordkeeping

All staff of TQI have recordkeeping responsibilities.

The Director, Governance is TQI's staff member in charge of records management, known as the Records Manager. The Director, Governance is supported by a team to ensure TQI stores and maintains its records in accordance with the TQI Records Management Program. Team members include:
- Assistant Director Professional Registration Services
- Coordinator, Strategic Data and Digital Services
- Records Management Projects

The Records Manager is responsible for:
- ensuring compliance with all parts of TQI's Records Management Program;
- ensuring that all parts of TQI's Records Management program are kept up to date to reflect all recordkeeping requirements that TQI must meet (including the administrative directions of government, in Section 1 above)

Managers and supervisors are responsible for ensuring that staff under their direction, including consultants and contractors, meet all the requirements of this Policy and the associated Procedures. Records management is as important a part of their supervisory and management functions as any other part of their functional responsibilities.

All staff have responsibilities in relation to the records of the function they perform. In particular they are required to make accurate records of their activities, to ensure that such records are incorporated into the recordkeeping system and to comply with all records management procedures.

2.6 Records Management Procedures

This Policy is supported by TQI's Records Management Procedures (Section 3 below).

The Procedures detail the way all staff in TQI will make, modify, use, handle and care for records, how, and for how long records will be kept, and how access to them will be provided.

2.7 Recordkeeping Standards

TQI will conform to the *Territory Records Act 2002* and Territory Records Office Standards for Records Management. This Policy and TQI's Procedures have been developed in conformity with both the Act and the Standards. In cases where recordkeeping issues arise which are not covered by the Policy or Procedures TQI will follow advice from the Territory Records Office.

2.8 Relationship to other policies

Other TQI policies may cover issues related to records management. This policy is not to be seen as subordinate to them. In the case of any apparent contradiction between policies the issue is to be referred to the Records Manager for resolution. This role is also responsible for seeing that related policies are progressively examined to ensure that they reflect the requirements of this policy without detracting from their own purposes. Such examinations will be completed on a rolling basis aligned to policy review dates**.**

2.9 Review of policy and procedures

This Policy will be reviewed every five years. The Records Manager is responsible for initiating this review. A policy review may be initiated at an earlier date if circumstances make it appropriate to do so. Circumstances that would be likely to make such a review appropriate include a major change in the functions of TQI or significant administrative change in it.

SECTION 3 – Records Management Program: Procedures

3.1   The *Territory Records Act 2002* (the Act) requires ACT Government Directorates to have an approved Records Management Program. Principle 3 of Standard No.1 – Records Management Programs, issued under the Act, requires Programs to be implemented.

Introductory Procedures material

3.2   **Purpose**

These Records Management Procedures for TQI detail how TQI will implement its Records Management Policy (Section 2 above). A summary of some of TQI's records management practices are at Attachment A.

3.3   **Compliance by all staff**

All staff of TQI must comply with these Procedures. Where functions are outsourced, the outsourcing contract specifies the extent of compliance with these procedures by staff under the outsourcing contract.

3.4   **Scope and primary record keeping responsibilities**

These Procedures provide an overview and some operational detail for staff of TQI. In addition, staff must have access to, and comply with the requirements of TQI procedures which include records management components.

Customer Relationship Manager (CRM)
For most TQI staff, the primary record keeping responsibility for teacher and organisation (schools, employers and accredited program providers) records is in the correct use of the business system (Microsoft Dynamics CRM). To this end all relevant staff must:

- Use Microsoft Outlook and business system tracking functions to ensure all relevant emails sent and received are stored in the business system against the correct teacher/organisation record
- Scan, add notes or service activities to the business system of any non- email interaction between TQI and the stakeholder.

Instructions on the correct use of the business system are contained within the functional procedure that supports the work the staff member is doing. They are currently located under:

TEACHER QUALIFICATION REGULATIONS\Procedures

INFORMATION AND COMMUNICATIONS TECHNOLOGY\Policies and Procedures

INFORMATION MANAGEMENT\Procedures

Outside CRM

Staff who create/manage administrative records that are not teacher or organisation specific or are not suitable for storage in the business system, must ensure that the appropriate records are correctly filed in Content Manager (TRIM).

Currently, however, TQI's document management system, Content Manager, is not connected to the ACT Government WoG Content Manager system. Rather, it is a standalone instance of Content Manager, accessed using a remote desktop to the TQI external hosting environment. Documents on G drive can be dragged and dropped to Content Manager.

It is expected that TQI's Content Manager will be transferred to the WoG system in 2023. Until then, most records that would normally be created and saved in Content Manager, will be stored on G Drive. Due to the complexity of using a remote system, only two staff currently access Content Manager. At least once a year, records that are more than three years old, and which are not regularly accessed, are transferred from G drive to Content Manager. Once TQI is attached to the WoG Content Manager, the following procedures will apply:

- No Dissemination Limiting Marker (DLM) – records are transferred to Content Manager in a regular, timely fashion dictated by the duration of the project/activity and operational need to maintain grouped documents for easy access outside the thesaurus structure
- Some regularly used non-DLM records (e.g. infographics) may be retained on SharePoint, the TQI Intranet site, as well as being placed in Content Manager.
- Record requires a DLM – immediate transfer to Content Manager required.
- Record relates to a reviewable decision under TQI legislation – immediate transfer to Content Manager required.

Post 2023, it is expected all records not held in CRM, will be created and saved in Content Manager. Some common records that must be captured in Content Manager include:

- Decisions, discussions and recommendations - TQI business conducted in informal situations or through face-to-face contact
- Meetings - records such as agendas, attendance, material presented, decisions and recommendations, minutes and follow-up correspondence
- Client information - business activities with regard to the management of TQI clients. This includes reports, decisions, discussions and recommendations including the creation and management of case notes and regulatory decisions.
- Sending and receiving business correspondence - records sent or received by email, or post
- Significant telephone conversations - records documenting decisions or commitments conducted via the telephone
- Electronic commerce - records from transactions conducted online, including emails.

3.5   Date and Duration

These Procedures apply from the date of approval of Section 1 of the Records Management Program of TQI by the Board under the Act.

Recordkeeping environment

3.6   **Recordkeeping System**

TQI operates an electronic document and records management system (EDRMS). It operates with digital records only but acknowledges that paper-based records pertaining to TQI/TQI staff exist in other areas of the ACT Government:

- Shared Services for the management of all current ACT Government personnel records
- Shared Services Finance records relating to accounts payable approvals/processing

The TQI EDRMS comprises:

- TQI business system, currently Microsoft Dynamics CRM
- Content Manager
- Incoming and outgoing emails
- Documents created through the Microsoft Office suite
- Graphics documents in common image formats including jpg and tiff
- Digital documents in portable document format (pdf files)
- Other digital document formats in use by the agency.

Historically most documents have been created and maintained within TQI's G drive. As mentioned above, TQI's access to WoG Content Manager is expected to be activated in 2023. From that point, TQI records will be created and stored in Content Manager.

3.7   **Records Management Principles**

TQI adopts the key principles of records management as outlined in [The Australian Standard on Records Management, AS ISO 15489:](#)

TQI makes and maintains authentic, reliable and useable records, and protects the integrity of those records for as long as required. To do this, TQI has a comprehensive records management program that includes:

- determining what records should be made in each business process, and what information needs to be included in the records;
- deciding in what form and structure records should be made and captured, and the technologies to be used;
- determining what metadata should be made with the record and through records processes and how that metadata will be persistently linked and managed;
- determining requirements for retrieving, using and transmitting records between business processes and other users and how long they must be kept to satisfy those requirements;
- deciding how to organise records so as to support requirements for use;
- assessing the risks that would be entailed by failure to have authoritative records of activity;

- preserving records and making them accessible over time, in order to meet business requirements and community expectations;
- complying with legal and regulatory requirements, applicable standards and public service policy;
- ensuring that records are maintained in an appropriate and secure environment;
- ensuring that records are retained only for as long as needed or required; and
- identifying and evaluating opportunities for improving the effectiveness, efficiency or quality of its processes, decisions, and actions that could result from better records creation or management.

Business continuity planning and contingency measures ensure that records that are vital to the continued functioning of the organisation are identified as part of risk analysis, protected and recoverable when needed.

3.8   Outline of the legislative environment

Acts influencing the Records Management Program of TQI include:

- *Territory Records Act 2002* (which details the requirements for recordkeeping for Territory agencies)

- *Public Sector Management Act 1994* (which establishes 'accountability to the government for the ways in which functions are performed' as a key value of the ACT Public Service)

- *Freedom of Information Act 1989* (which allows public access to Territory records and gives members of the public the right to see records about themselves).

- *Privacy Act 1988* (which protects members of the public from the misuse of information about themselves and which gives people a right to see records about themselves).

- *Evidence Act 1971* (which provides that a court may need to examine records as evidence of an agency's decisions and actions and which details requirements relating to the authenticity of electronic records)

Acts for which TQI has responsibility: *ACT Teacher Quality Institute Act (2010)*

3.9   Recordkeeping standards employed

TQI adopts the recordkeeping standards contained in the Act, and the Standards and associated Guidelines issued by the Director of Territory Records under the Act.

3.10   Resourcing the Records Management Program

Financial resources

Expenses of the operation of the Records Management Program will be met from TQI's normal budgetary arrangements.

Human resources

All staff have a responsibility for maintaining and keeping records. The making and keeping of full and accurate records of TQI's activities is mandatory.

a) Chief Executive Officer

TQI's Chief Executive Officer has statutory responsibility under the Act for ensuring that the Records Management Program is created, approved, implemented and adhered to. The CEO is responsible for:

- strategic planning for records management activities, including resourcing, staffing and budgeting;
- arranging appropriate resources allocation to enable the program to be established and maintained;
- the appointment of a Records Manager to manage the day-to-day records management of the agency;
- monitoring that staff charged with specific records management responsibilities are appropriately trained and managed for that task;
- ensuring new and existing personnel undertake recordkeeping awareness training;
- assigning records management tasks to identified positions;

TQI notes that due to its small size, one person may fill more than one of the roles below.

b) Senior Manager with responsibility for records management

The Chief Executive Officer has appointed the Director, Governance to have responsibility for delivering the Records Management Program of the agency and reporting to the Principal Officer on its delivery. The Records Manager is responsible for:

- compliance with external Records Management standards;
- the implementation of internal recordkeeping practices;
- ensuring all personnel are aware of their individual responsibilities to create and keep records in corporate recordkeeping systems in accordance with the agency's Records Management Program;
- ensuring that recordkeeping systems underpin and support business processes;
- approval of Procedures that are included in the agency's Records Management Program;
- ensuring full and accurate records of business activities are made and kept;
- reviewing and updating the Records Management Program on a rolling basis such that the entire Program is reviewed and updated at least every five years;
- incorporating recordkeeping principles into all business processes;
- obtaining expert advice where required on records management issues and practices;
- implementing performance measures and evaluation measures to meet corporate objectives and relevant standards; and
- implementing reviews and updates of the Records Management Program on a rolling basis such that the entire Program is reviewed and updated at least every five years.
- designing, developing and maintaining recordkeeping systems including the development and maintenance of functions-based thesaurus;
- applying thesaurus terms from the *Whole of Government Thesaurus of Terms* to files to ensure consistent classification, titling and indexing;
- making new files (electronic containers) and closing files;

- accepting non-current files for storage, managing the storage of records, and providing a retrieval service;
- facilitating public access to records in cooperation with TQI's FOI officers;
- appraising and developing the functional *Whole of Government Records Disposal Schedules*; and
- sentencing records to determine retention periods against the *Whole of Government Records Disposal Schedule.* TQI records manager requires training in this area. It is anticipated TQI will have developed sentencing of records capacity when it migrates its records to the WoG Content Manager.

c) All Staff

Good Recordkeeping is practised by staff as a normal part of everyday business processes. Staff fulfil their Recordkeeping responsibilities by adhering to TQI's policy and procedures for records management. In particular, staff have a responsibility to:

- make accurate and full records as evidence of their business activities;
- Identify, classify, and capture records including electronic records, into official recordkeeping system(s); and
- protect and dispose of records using approved disposal schedules.

d) Managers & supervisors

Records management is as important a part of managers' supervisory and management functions as any other part of their functional responsibilities. Therefore, managers and supervisors at all levels are responsible for encouraging staff under their direction to meet all the requirements of the Act by complying with TQI's policy and procedures for records management. It is the responsibility of every business manager to support recordkeeping practices and processes of their staff by:

- ensuring their staff attend recordkeeping training;
- facilitating their staff have access to tools, procedures and expertise to help them carry out their recordkeeping responsibilities;
- encouraging compliance with TQI's Records Management Program within their area(s) of responsibility;
- having detailed knowledge of business recordkeeping requirements in areas for which they are responsible;
- knowing the Records Management Procedures in sufficient detail to be able to meet their responsibility;
- providing guidance and on the job training in good records management practice;
- monitoring that the records management procedures are implemented.

TQI's induction and general training programs include basic records management principles, processes and practices and the need to comply with TQI's Records Management Policy and Procedures.

e) Webmaster & Intranet Manager

It is essential that web-based records, whether provided in-house or outsourced, are identified and maintained in line with TQI's records management policy and procedures. As such Webmasters are responsible for monitoring compliance. The document owners are responsible for version control on the Internet and the intranet.

f) System Administrators

System administrators are responsible for maintaining TQI's electronic Recordkeeping systems including maintaining the integrity and authenticity of electronic records and their associated metadata.

g) Contractors and Consultants

Contractors and consultants are required to adhere to all relevant parts of TQI's policy and procedures manual including the need to make and keep full and accurate records.

h) Exit Protocols

When staff, consultants or contractors leave TQI all records must be captured onto TQI's Recordkeeping systems and those records not needing to be retained are treated through normal administrative practices.

Computer drives that are not part of TQI's recordkeeping systems will have all files completely removed from these drives before departure.

3.11   Recordkeeping practices and business rules

The TQI Electronic Document and Records Management System (EDRMS) recordkeeping system

Types of records employed by the agency – electronic records may be created in the following formats: business system entries, database reports and queries, email, Microsoft Office suite, PDFs including scan of fax or original document, screenshots of online resources, various other electronic file types eg .jpg .gif.

Procedures for managing e-mail records – where there is an associated business system record for the entity, use the Tracking or Set Regarding functions in the business system to track the email against the entity record.

Procedures for describing records – a combination of document title, file location mapped against the thesaurus and creation of meta data.

3.12   Making and capturing records

Records are to be captured in a recognised records system as soon as they are made or received. Currently, records are stored in G Drive and in CRM. After TQI's Content Manager content is migrated to the WoG Content Manager (expected in 2023), records currently stored in G drive, will be stored in Content manager.

The following functions must be included in the creation and capturing of records:

- **Capture** – formally determine that a record be made and kept
- **Registration** – formalise the capture of a record into a designated records system by assigning a unique identifier and brief descriptive information about it (such as date, time and title)

- **Classification and Indexing** – identify the function and activities to which a record relates and then link it to other records to facilitate description, control, retrieval, disposal and access
- **Access and Security** – assign rights or restrictions to use or manage particular records according to their sensitivity
- **Sentencing** – identify and link the retention period of a record to a functions-based disposal authority at the point of capture and registration
- **Storage** – maintain, handle and store records in accordance with their form, use and value for as long as they are legally required
- **Use and Tracking** – to be able to locate a particular record (movements), ensure that only those employees with appropriate permissions are able to use or manage records and that such access can be tracked as a security measure
- **Disposal** – identify records with similar disposal dates and triggering actions, review any history of use to confirm or amend the disposal status, and maintain a record of disposal action that can be audited.

3.13   Locating records

The location of electronic records must be known at all times. Records relating to a registered or previously registered teacher or pre-service teacher must be stored in the teacher's profile on CRM. Administration records are initially stored on G drive or SharePoint according to the protocols in this document and the ACT Thesaurus and will be subsequently stored in WoG Content Manager.

3.14   Storage and movement of records

All records must be protected from inappropriate and unauthorised access. Sensitive and private information must be protected against unauthorised access or modification, external disclosure and other forms of misuse. It is essential to assign enforceable and manageable security classifications to those records that must be stored with limited access arrangements; such as records with privacy, Freedom of Information (FOI) or commercial sensitivity. In the interim period before TQI is connected to the WoG Content Manager, senior managers are responsible for ensuring records requiring limited access are stored in Content Manager, with appropriate security applied.

The risks of the personal information of teachers' and TQI staff being accessed inappropriately will be mitigated by the migration of all records stored on G drive to WoG Content Manager. Until this migration takes place, TQI staff responsible for records containing personal information must limit access to the G drive folders to regulatory and supervising staff. Once migration takes place, Content Manager files containing personal information must have access limited to regulatory and supervisor staff.

The central policy for protective security in the ACT Government is the *ACT Protective Security Policy and Guidelines.* The Guidelines apply across ACT Government and provide a framework for agencies in their approach to the protection and security of people, assets and information in a way that is consistent.

Security classifications are allocated to a file or an individual record according to the degree of privacy, commercial, legal damage or other sensitive circumstances that might result from unauthorised access or disclosure of the record.

Application of the relevant Dissemination Limiting Markers (DLMs) is done on a case by case basis. The presence or absence of such a marking will not affect a document's status under the FOI Act. Information should only be security classified when the results of compromise warrant the expense of increased protection. It is important that information not requiring protection remains unclassified. Dissemination Limiting Markers (DLMs) can be used for information requiring the lowest levels of protection.

Most of the information held, collected and processed by the ACT Government is considered UNCLASSIFIED. That does not mean that UNCLASSIFIED information is available for public release. Unclassified official information may be unlabelled or be marked 'Unclassified'.

ACT Government employees must have authorisation to release unclassified information to members of the public. The Chief Executive Officer or another authorised officer may grant authorisation. When personal information is involved, any release must comply with the *Information Privacy Act 2014*.

Documents used by Cabinet to formulate policy and make decisions require special protective measures. This is because Cabinet documents, unlike other official information, belong to the governments that create them. They are integral to the process by which governments make decisions and they constitute the record of those decisions.

Any unauthorised disclosure damages the openness and frankness of discussions in the Cabinet Room and potentially impedes the process of good government.

All final documents for consideration by Cabinet, as a minimum, are to be marked *Sensitive: Cabinet*.

Documents prepared for Cabinet are stored in PDrive. Access to P drive has been given to the CEO and one other TQI officer.

3.15   Preservation of records

The following are minimum provisions to be made for the storage of electronic records:

- electronic records and metadata that are still required for either a limited period or permanently must be migrated to new systems when upgrades occur.
- backup procedures appropriate to the value of records (including the storage of regular backup discs or tapes off-site) are to be identified through Service Level Agreements and implemented by Shared Services ICT.

Under the *Territory Records Act 2002*, agencies are required to dispose of records in accordance with approved disposal schedules. Legally, disposal of records can only be carried out if:

- there is a law positively requiring a particular disposal action
- the disposal is part of 'normal administrative practice' (NAP) that the Territory Records Office has not disapproved
- it is to return the records to the rightful custody of the Territory.

Sentencing is the process of implementing appraisal decisions by determining the part of a Records Disposal Schedule which applies to an individual record and assigning a retention period consistent with that part. To comply with this Standard, Agencies must ensure that staff carrying out sentencing, adhere to the principles of appraisal. These principles apply whether staff are designing systems or procedures that capture records, applying appraisal decisions at file closure, or programming and reviewing disposal actions in automated systems. Sentencing protocols will be set up once TQI is connected to the WoG Content Manager.

3.16   Disposal of records

Any records not covered by an approved disposal schedule must be retained, pending appraisal and the authorisation of appropriate disposal action.

Official records are only to be destroyed or otherwise disposed of by a disposal process approved by the Territory Records Office (TRO). For paper records this is usually done by shredding or pulping. For records in other media it is important to ensure that the records are treated in such a way as to ensure the information in them is no longer retrievable. This includes the 'deletion' of official records in any electronic or computer based system.
There are five (5) categories of records that have been identified which meet the objective for being retained as Territory Archives. The Criteria for Selection of Territory Archives is outlined in the Territory Record Standard No: 2 – Appraisal at Principle 2: Identification of Territory Archives.

In 2011 The Territory Records Office approved a new Records Disposal Schedule, Notifiable instrument NI2011-162, For preserving records containing information that may allow people to establish links with their Aboriginal or Torres Strait Islander heritage.

Records ready for destruction in Content Manager, according to the disposal schedule, will be reviewed to ensure that there are no Aboriginal or Torres Strait Islander heritage records that need to be excluded from the automated disposal process.

TQI must take measures to protect vital records in the event of disaster including remote storage of back-up data.

TQI will apply disposal schedules according to the Territory records Act, once TQI records have been migrated to the WoG Content Manager. Until that time, no records will be destroyed. TQI will, however, take account of WoG guidelines on the disposal of personal information.

- ***Normal Administrative Practice (NAP)*** – TQI procedures make a clear distinction between what constitutes a record and what can be destroyed as normal administrative practice.

Items that fall into the latter are: facilitative or short term items (e.g. appointment diaries, personal emails), rough working papers or calculations, drafts not intended for further use or reference (e.g. reports, correspondence that have minor edits that do not form part of the record creation process, reference material only, published material that is not part of an agency's record)

- ***Implementing the Whole of Government Records Disposal Schedules*** – these schedules must be set up in Content Manager so that correct disposal can happen when system administrator functions are run annually. This will happen as a part of the migration of TQI Content Manager to WoG Content Manager (expected in 2023.)

3.17   Public access and use

TQI's approved records management program will be available on the [TQI website](#) or by contacting TQI.

According to the *Territory Records Act 2002*, records are open to public access on the next Canberra Day after the record reaches 20 years of age. TQI is responsible for examining records that reach 20 years to ensure their contents may be available for public access. The first year this provision is applicable to TQI is 2031. Although the principle of openness guides decisions relating to access, some records will need to be exempted from public access. The *Territory Records Act 2002* sets out the criteria for records which may require exemption.

These criteria are from the Freedom of Information Act 1989 and relate to records:

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

Records are exempted from the access provisions of the Territory Records Act by the Director of Territory Records making a declaration under section 28 of the Territory Records Act upon request from agencies.

3.18   Other compliance information

Notification of outsourcing

ACT Government's procurement guidelines are in the *Government Procurement Act 2001*. This process of notifying the Territory Records Office is a separate legislative requirement.

TQI's procedures for outsourcing include the requirement for TQI's Records Manager, nominated in Section 1, to inform the Director of Territory Records about any arrangements for outsourcing or internal outsourcing all or any part of its records management.

Dialog Information Technology currently hosts TQI's instance of Content Manager. This is expected to change once TQI's records are migrated to the WoG Content Manager. TQI does not delegate records management responsibility.

Examination by Director of Territory Records

TQI is committed to helping the Director of Territory Records to examine the operation of TQI's Records Management Program and compliance with the Program. TQI's Records Manager, nominated in Section 1, will liaise with the Director of Territory Records to assist with any examination.

Compliance Reporting

TQI will report to the Territory Records Office on its record management activities. The nominated Records Manager will be responsible for this reporting to ensure that:

- TQI reports to the Director of Territory Records and the Territory Records Advisory Council as required. Reports to the Records Advisory Council may be on such matters as the disposal of records and the preservation of any records that the agency may hold about Aboriginal and Torres Strait Islander heritage:
- Records management performance indicators are incorporated into other areas of TQI's business reporting framework;
- Recordkeeping is a key result in all corporate plans; and
- Recordkeeping performance is provided to the TRO for inclusion in the TRO Annual Report.

3.19   Program evaluation and review

Performance measurement and evaluation

TQI's Records Manager has responsibility for arranging periodic audits of all aspects of the Procedures to ensure compliance with the rules and practices outlined in them. This monitoring evaluates the performance of the Records Management Program to determine whether it is meeting corporate objectives and relevant standards.

Provision for review of Program

TQI's Records Manager has responsibility to review and replace or amend the Records Management Program on a rolling basis, so that the entire Program is fully reviewed at least every five years.

SECTION 4 – Records Management Program Business Systems

A Records Management Program must incorporate reference to those business systems that provide recordkeeping functionality to TQI.

To aid in the identification and recordkeeping functionality of each business system utilised by TQI, a copy of the Business System Descriptive Elements form, which describes each business system against the criteria outlined in *Territory Records Standard – Number 3: Description and Control*, needs to be attached to the Program.

4.1 Business System Descriptive Elements

Business system name	Vendor	Version number	Date commenced	Date closed	Title – provides for a meaningful record title	Date – captures dates of when records are created	Identifier – assigns a unique, non-meaningful	Creator – captures details of the record creator	Management history creates user, maintenance	Access and security provisions – captures
Content Manager	Micro Focus, Dialog	10.0.2.651	2011	N/A	Yes	Yes	Yes	Yes	Yes	Yes
Dynamics CRM	Microsoft, Dialog	2016	2011	N/A	Yes	Yes	Yes	Yes	Yes	Yes
TQI Portal	Dialog	N/A	2011	N/A	N/A	N/A	N/A	N/A	N/A	Yes
Squiz Matrix	Squiz, DDTS	As per WhoG	2011	N/A	Yes	Yes	Yes	Yes	Yes	Yes
SharePoint	Microsoft, DDTS	As per WhoG	2016	N/A	Yes	Yes	Yes	Yes	Yes	Yes