

## THE EMRC'S RESPONSE TO THE WESTERN AUSTRALIAN AUDITOR GENERAL'S REPORT INTO RECORDS MANAGEMENT IN LOCAL GOVERNMENT – REPORT 17: APRIL 2019

### ACTION PLAN

#### **Audit Recommendation 1: *Local Governments should implement regular and thorough records training.***

Since the audit, the EMRC has upgraded its Records Management System from HP Trim to Micro Focus Content Manager.

The EMRC is developing and implementing a program of records training, to be provided on a regular basis with more comprehensive content. This will involve six types of records training sessions. These will include:

##### 1. *Induction Sessions*

- Mandatory session as part of the corporate induction process for new members of staff. This is currently held as a one on one session at the employee's workstation as this allows the training to be tailored to the previous records experience of the new staff member.
- The emphasis of the training will be to inform the inductee of their records management obligations and to present the basics of the EMRC's Records Management System.
- An "over the shoulder teaching" approach will be used to educate the inductee in navigating and using the EMRC's Records Management System.
- A focus on the job specific areas of the inductee within the training will be performed to better acquaint the inductee with their Records Management obligations, the tools and functionalities of the Records Management System and the key subject matters that they will be working with.

##### 2. *Follow-Up Training Sessions*

- Follow-Up to induction in both Records Management and the Records Management System content with new employee.

##### 3. *Refresher Training Sessions*

- Will be provided as a result of a request from employee for further one on one training in Records Management practices and/or tools and functionalities of the Records Management System.

##### 4. *Business Team Training Sessions*

- Will be provided as a result of a request from a whole business team.
- This form of refresher training provided to a business team would be focused on the job specific areas of the team, the particular areas of Records management obligations and/or Records Management system functionality raised by the team for refresher training or as discovered by the Records Officer in information gained from a review of staff recordkeeping, in terms of deficiencies in the records management practices and usage of the Records Management System by the individual team, in general terms.

##### 5. *Ad Hoc Group Training Sessions*

- These will be provided on a periodic basis as need arises.
- They will be held as half hour sessions and offered to all members of the organisation to attend, if they feel they need further/refresher training regarding their records management obligations and/or their usage of the Records Management System.
- These sessions will be conducted in an informal Question and Answer format to allow the attendees to achieve further learning, whilst being held in a more relaxed atmosphere.

##### 6. *External Providers Training Sessions*

Periodic records training by external providers will be held on an as needs basis to:

- Train Records staff on specific matters, e.g. Major changes to the Administrator functionality in the organisation's Electronic Document and Records Management System as a part of a major upgrade, e.g. Content Manager.

- Provide training to all staff prior to major upgrades to the organisation's Electronic Document and Records Management System, e.g. Content Manager.
- To update Records and/or all staff in best practice record keeping standards.

The resourcing that will be needed to provide these training sessions in records management at the EMRC will be from the following sources:

- Internal providers being the Records Officer and/or Manager Information Services.
- External providers being consultants and experts in records management practices and the Records Management System.

***Audit Recommendation 2: Local Governments should implement regular reviews of staff record keeping practices.***

A program of internal audits will be developed and implemented to regularly review staff record keeping practices. These reviews will be used to provide feedback to staff and to inform the content of the various types of records training sessions.

The regular reviews of staff record keeping practices will involve the following:

- Reviews will be performed on a monthly basis by the Records Officer and the results of reviews reported to the Manager Information Services and to the Executive Management Team.
- The Records Officer will conduct a search for records created by a whole individual business directorate each month.
- The indicators for staff record keeping performance will be:
  - Document titling.
  - Saving documents to correct folders, which includes requesting creation of new folders for new matters, rather than saving documents to older folders.
  - Correct completion of metadata fields.
- The indicators will be used to drive continuous improvement of the EMRC's record keeping.

***Audit Recommendation 3: Local Governments should implement timely disposal of records.***

The audit identified that the EMRC has not disposed of any records for over 12 months. To address this, the EMRC will implement two 6 monthly records disposal programs to evaluate records due for disposal and to proceed with disposal if appropriate.

Ongoing, the EMRC will establish an annual program to evaluate/re-evaluate and/or dispose of records that are due for destruction.

The terms of the General Disposal Authorities for Local Government Records and Source Records will be applied to evaluate/re-evaluate and sentence physical and electronic records, within the conducting of these records disposal programs.

***Audit Recommendation 4: Local Governments should implement adequate protection over digital records.***

The EMRC has developed a records disaster recovery plan for digital records. The majority of digital records are stored in the Records Management System (Micro Focus Content Manager 9.3); however some records such as Risk Assessments, Risk Treatment Plans and staff training records are stored in the Finance System (SynergySoft). Additionally work under development may be stored on the File Server. The IT Disaster Recovery Plan outlines how these systems would be restored in the event of a disaster and is supported by server replication to a remote site and also tape backups that are stored offsite.

The audit report summarised (in Table 3) the results of testing the local governments for planning for and implementing disaster recovery processes for digital records. The table highlights several areas for improvement for the EMRC, all relating to testing the disaster recovery plan.

- The EMRC did not test the disaster recovery plan on a periodic basis.
- The disaster recovery plan was not tested to check the timeframe for the recovery of digital records.

- The disaster recovery plan did not state the requirement for periodic testing of the plan.
- Adequate records were not recorded of the testing that had taken place.

To address this issue the EMRC will include in the disaster recovery plan the requirement for testing on a periodic basis and that the results of the testing are to be documented.

**Audit Recommendation 5: *The EMRC should maintain complete and appropriate records to support operational decision making.***

- This recommendation derives from the significant issue that *“Important records are missing or hard to find.”*
- The EMRC is in the process of developing and implementing an auditing program of important records within the organisation to be conducted on a quarterly basis. These will be performed as ‘spot checks’ of identified key areas of the organisation and their record keeping practices.
- The quarterly auditing program of important records will focus on important records such as:
  - Human Resources records, particularly police clearances, position descriptions and reference checks.
  - Red Hill Waste Management Facility complaints documents, specifically complaint cover sheets and responses to complaints and documents recording the development and implementation of modified policies, processes and procedures to improve specific practices that were identified in an individual complaint.
  - Key contracts documents especially letters of award and fully executed and signed agreement documents.
  - Confidential items documents such as confidential reports and matters presented at council meetings, councillors annual returns records and financial and proximity interests’ disclosures.
  - Vital documents including property title deeds, insurance policies and current executed and signed contracts.
- The results of the audits will be used to drive improvement in the EMRC’s record keeping ensuring that records of important matters are made.
- The requirement for maintaining of *“complete and appropriate records to support operational decision making”* will be emphasised as a key component of the content within all records management training, both official and unofficial.

**Audit Recommendation 6: *The EMRC should address findings 2, 4 and 5 of this management letter by developing adequate policy and procedure, ensuring staff are fully informed of record keeping responsibilities by conducting records refresher training, and regularly monitor staff compliance with record keeping responsibilities.***

- The elements of this recommendation are:
  - Develop adequate policy and procedures;
  - Conduct refresher training to ensure staff are fully informed of their record keeping responsibilities;
  - Monitor staff compliance with record keeping responsibilities.
- Records policies will be reviewed to ensure they reflect the requirements under the *State Records Act 2000*.
- Record keeping procedures will be reviewed to ensure that they are adequate and foster good record keeping practices within the organisation.
- The record keeping requirements of individual business units will be reviewed and job-specific guidelines will be developed on a needs basis.
- Refresher training and monitoring are addressed in responses to Audit recommendations 1 and 2, above.
- Staff compliance monitoring is addressed in the responses to Audit recommendations 2 and 5, above.

Please note that items 1 to 4 were the recommendations in the OAG report tabled in parliament. Items 5 and 6 were the recommendations relating to the one significant issue identified by the OAG audit at the EMRC.

A summarised action plan is attached. The plan is divided into three columns:

- The first column is the *Audit Recommendations* which are drawn from both the Audit Report and the Management Letter
- The second column is the *Action Items* which states how the organisation will address each *Audit Recommendation* and
- The third column is the *Target Date*, which states the month and year that the organisation is setting for the completion or introduction of each *Action Item* to comply with each *Audit Recommendation*.

**WENDY HARRIS**  
**Acting Chief Executive Officer**

**5 July 2019**

**Audit — Office of the Auditor General  
Records Management in Local Government**

**Eastern Metropolitan Regional Council (EMRC)  
Action Plan**

Audit Recommendations	Action Items	Target Dates
1. LGs should implement regular and thorough records training.	1.1 A program of records training will be developed and implemented. 1.2 Including six forms of training sessions, i.e. <ul style="list-style-type: none"> <li>• Induction Sessions</li> <li>• Follow-Up Sessions</li> <li>• Refresher Sessions</li> <li>• Business Team Sessions</li> <li>• Ad Hoc Group Training Sessions</li> <li>• External Providers Training Sessions</li> </ul>	08/2019
2. LGs should implement regular reviews of staff recordkeeping practices.	2.1 Regular reviews of staff record keeping will be used to provide feedback to staff and for training.	08/2019
3. LGs should implement timely disposal of records.	3.1 A Records Disposal Program will be developed and implemented, which will include both physical and electronic records.	04/2020
4. LGs should implement adequate protection over digital records.	4.1 The EMRC has developed a records disaster recovery plan for digital records.  4.2 The IT Disaster Recovery Plan outlines how the EMRC's record keeping systems would be restored in the event of a disaster and is supported by server replication to a remote site and also tape backups that are stored offsite.  4.3 The EMRC will include in the disaster recovery plan the requirement for testing on a periodic basis and that the results of the testing are to be documented.	01/2020
5. The EMRC should maintain complete and appropriate records to support operational decision making.	5.1 This recommendation related to the finding of missing or hard to find records and will be partially addressed in 2.1 above. 5.2 A program of internal audits will be developed to verify that important records have been maintained. 5.3 The requirement for maintaining of complete and appropriate records to support operational decision making will be included within records management training.	08/2019
6. The EMRC should develop adequate policy and procedure; ensuring staff are fully informed of record keeping responsibilities by conducting records refresher training, and regularly monitor staff compliance with record keeping responsibilities.	6.1 Record keeping policies and procedures will be regularly reviewed, approved and distributed to staff and procedures will be developed and implemented for individual business areas as appropriate. 6.2 Refresher training and monitoring are addressed in 1.1, 2.1, 5.2 and 5.3 above.	09/2019 (Policies) & 01/2020 (Procedures)  08/2019

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