# Digital Transition and Enterprise Content Management Policy

(for the management of information and records in ASIC)

October 2012

## About this document

This document describes ASIC's digital transition and enterprise content management (ECM) policy for the management of information and records in ASIC.

It establishes a framework for the transition and adoption of digital strategies, methods and tools used to capture, manage, store, preserve, and deliver content and documents related to organizational processes. ECM tools and strategies allow the management of an organization's unstructured information, wherever that information exists.

## Document control

### How to use this document
The definitions used in this guide are to be read in conjunction with the policy and key terms.

### Ownership
The Information Resource Centre (IRC) is responsible for the development and implementation of ASIC's digital transition and enterprise content management policy.

### Status and details

| Status | Effective date | Review date | Expiry date | Author | Inquiries contact |
|--------|----------------|-------------|-------------|--------|-------------------|
| Draft | 1 October 2012 | | | Information Resource Centre | Senior Manager, IRC |
| Final | 24 October 2012 | 15 March 2015 | 23 October 2015 | | |

### Application
This policy applies to all areas of ASIC's operations, including the Superannuation Complaints Tribunal (SCT) and the Companies Auditors and Liquidators Disciplinary Board (CALDB). It applies to all Commission members, members of the SCT and CALDB, staff (ongoing, non-ongoing and temporary), secondees, consultants and contractors where security obligations are specified in contracts as information users.

This policy applies to all records (see definition in Section C – Key Terms below) generated or received by ASIC staff.

### Approvals
This document is approved by:

| Name | Title | Approval date |
|------|-------|---------------|
| Commission | | 24 October 2012 |

### Version history

| Version | Name | Details of changes/comments | Distribution | Date |
|---------|------|------------------------------|--------------|------|
| | | | | |

### Distribution
This document has been distributed to the following parties on the following dates:

| Version | Title | Distribution list |
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| | | |

### Policy location
This document is located on myASIC.

# Contents

# A    What this policy is about

1.        The purpose of this policy is to establish a framework for the transition and adoption of digital strategies, methods and tools used to capture, manage, store, preserve, and deliver content and documents related to organizational processes. ASIC is committed to establishing and maintaining records and information management practices that meet business needs, accountability requirements and stakeholder expectations.

2.        This policy does not cover the management of evidence used for ASIC matters.  Staff should refer to the Evidence Handling and Storage Policy and Evidence Management Procedures for details on managing evidence.

## Use of terms

3.        In this document, the terms:

    (a)    '**must**' refers to a legislative requirement that ASIC must meet;

    (b)    '**are required to**' or '**is required to**' refer to a control:

        (i)    to which ASIC cannot give a policy exception; or

        (ii)   used in other documents that set controls;

    (c)    '**are to**' or '**is to**' are directions required to support compliance with the mandatory requirements of the policy; and

    (d)    '**should**' refers to better practice—we are expected to apply better practice unless there is a reason to apply alternative controls.

# B Policy statement

4.    ASIC's records and information are part of its corporate memory and represent a vital asset to support daily functions and operations. They help ASIC to make good use of precedents and of organisational experience.

5.    ASIC's records:

   (a)   provide evidence of actions and decisions;

   (b)   support policy formation, high level decision-making, business continuity, efficiency and productivity in program delivery, management and administration;

   (c)   protect the interests of ASIC, our employees, clients and the community; and

   (d)   help ASIC deliver its services in consistent and equitable ways.

6.    ASIC is committed to meeting its responsibilities under the *Archives Act 1983* and to implement best practice in its records and information management practices and systems. All practices and procedures concerning digital transition and enterprise content management within ASIC are to be in accordance with this policy.

7.    ASIC is committed to meeting the requirements set out under the government's digital transition policy. Under this policy the majority of records are to be created, stored and managed digitally. To achieve the required outcome:

   (e)   incoming paper (physical) records should be scanned and managed digitally;

   (f)   records 'born digital' are to remain digital; and

   (g)   records created in authorised business information systems should be maintained and managed throughout its lifecycle in that system.  Outputs from the system should be managed within the corporate recordkeeping system.

8.    ASIC is committed to transitioning to best practice in managing its information, and to develop a culture which values effective digital information and records management practices.

9.    All Commission members, ASIC staff (ongoing, non-ongoing and temporary), members of the SCT and the CALDB, secondees, consultants and contractors are expected to apply and comply with this policy and supporting business rules.

## Policy Context

10.    The policy is the foundation for the implementation of the digital transition and enterprise content management framework throughout ASIC and

conforms to our regulatory requirements under the *Archives Act 1983 and other related legislation (see table 1)*

11.    ASIC seeks to integrate its digital transition and enterprise content management policies and procedures within organisation-wide information management governance.

## Legislation and Standards

12.    ASIC is committed to implementing standards and guidelines produced and identified by the National Archives of Australia, as well as conforming to our regulatory requirements as a Commonwealth agency, including but not limited to the legislation and standards set out below:

**Table 1:    digital transition and enterprise content management related legislation and standards**

| Legislation | Standards |
|---|---|
| • Archives Act 1983<br>• Australian Information Commissioner Act 2010<br>• Crimes Act 1914 – (section 70)<br>• Electronic Transactions Act 1999<br>• Evidence Act 1995<br>• Financial Management and Accountability Act 1997<br>• Freedom of Information Act 1982<br>• Privacy Act 1988<br>• Public Service Act 1999<br>• Spam Act 2003<br>• Telecommunications Act 1997<br>• Workplace Health and Safety Act 2011 | • AS ISO 15489.1-2002 Records management - General<br>• AS ISO 15489.2-2002 Records management - Guidelines<br>• National Archives of Australia (NAA) - standards, specifications, guidelines:<br>  http://www.naa.gov.au/records-management/publications/index.aspx<br>• NAA Digital Transition Policy and Digital Continuity Plan<br>• Protective Security Policy Framework (PSPF):<br>  http://www.protectivesecurity.gov.au/Pages/default.aspx<br>• ASIC's Records Management policies and procedures<br>  http://myasic.asic.gov.au/myASIC/Information-Resources/Records-Management/index.htm |

**Table 2:    ASIC specific legislation that impacts on digital transition and enterprise content management**

| Legislation | Standards |
|---|---|

- [Australian Securities and Investments Commission Act 2001](#)
- [Business Names Registration Act 2011](#)
- [Corporations Act 2001](#)
- [National Consumer Credit Protection Act 2009](#)

- AS 8000 – 2003, Good Governance Principles, Standards Australia
- AS/NZS ISO 31000:2009 Risk management - Principles and guidelines

13.          ASIC is committed to developing and maintaining authorised business information and corporate recordkeeping systems that capture and maintain records with appropriate evidential characteristics in accordance with the requirements of the above standards and legislation.

# Authorised Business Information and Corporate Recordkeeping Systems

14.          ASIC's authorised business information and corporate recordkeeping systems are dedicated to the creation and maintenance of authentic, reliable and usable records for as long as they are required to support business functions and activities.

15.          The corporate recordkeeping system will manage the:

    (a)   creation, capture and storage of records;

    (b)   protection of the integrity and authenticity of ASIC records;

    (c)   security and access to records; and

    (d)   disposal of records.

16.          For records to be managed in business information systems, and not the corporate recordkeeping system, they must be endorsed by the Senior Manager, Information Resource Centre and authorised by the Chairman to be considered as records management capable.[1]

17.          Business areas must recommend information systems for inclusion on the approved list by documenting how the system meets ISO 16175.

18.          The register of authorised business information and corporate recordkeeping systems will be maintained by the Information Resource Centre.

# Responsibilities

19.          The roles and responsibilities listed in Table 3 apply to the obligations and  requirements for records and information management, digital transition and enterprise content management:

**Table 3:    ASIC's digital transition and enterprise content management policy roles and responsibilities**

| Role | Responsibilities |
|------|------------------|
|      |                  |

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[1] Requirement under the Government's Digital Transition Policy http://www.naa.gov.au/records-management/digital-transition-policy/index.aspx:

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|---|---|
| All staff (including Commissioners) | • must adhere to ASIC policies, procedures and standards, and:<br><br>− use the enterprise content management system to document all substantive official business, unless an authorised business information system is used;<br><br>− ensure that the location of every physical file is up to date in the corporate recordkeeping system at all times;<br><br>− understand the specific digital transition and enterprise content management obligations and responsibilities that relate to their position; and<br><br>− identify and manage vital records in consultation with IRC.<br><br>• must only destroy records under an authorised disposal authority or through the application of Normal Administrative Practice (NAP). |
| Chairman | • together with the Commission, approves the digital transition and enterprise content management policy;<br><br>• provides sufficient support and resources for ensuring successful implementation of strategies under the digital transition and enterprise content management policy;<br><br>• authorises business information systems endorsed by the Senior Manager, Information Resource Centre as recognised records management capable systems; and<br><br>• promotes compliance with authorised digital transition and enterprise content management policies and procedures. |
| Commission/ers | • together with the Chairman, approves ASIC's digital transition and enterprise content management policy;<br><br>• endorses ASIC's approach to implementing this policy;<br><br>• ensures that Senior Executive Leaders (SELs) comply with this policy; and<br><br>• receives reports on non-compliance with this policy. |
| SELs, Senior Managers, Managers and supervisors | • are to consider the expectation to meet digital transition and enterprise content management obligations during Performance Agreement assessments;<br><br>• should monitor staff under their supervision to ensure that they understand and comply with the digital transition and enterprise content management policies and procedures for the creation and maintenance of records; and<br><br>• should support and foster a culture within their workgroup that promotes good digital transition and enterprise content management practices. |
| Senior Manager, Information Resource Centre | • is to develop strategies to support the digital transition and enterprise content management policy;<br><br>• must ensure that digital transition and enterprise content management practices comply with ASICs obligations and responsibilities as a Commonwealth agency;<br><br>• endorses business information systems as recognised records management capable systems if the business system meets requirements as set by the National Archives of Australia;<br><br>• must oversee the recordkeeping functionality of all authorised business information and corporate recordkeeping systems;<br><br>• must ensure all staff are aware of digital transition and enterprise content management requirements; and<br><br>• is to establish ASIC as a site of best practice for digital transition and enterprise content management. |

| Information Resource Centre | <ul><li>must create and maintain digital transition and enterprise content management procedures documenting recordkeeping requirements, rules and practices that all staff are obligated to follow;</li><li>should promulgate digital transition and enterprise content management policies and procedures to all staff;</li><li>are to monitor compliance with the digital transition and enterprise content management policy;</li><li>are to deliver digital transition and enterprise content management training and advice to all staff;</li><li>maintain, monitor and review authorised business information and corporate recordkeeping systems; and</li><li>ensure that records are kept for only as long as ASIC, government and the public require them, as established by disposal authorities.</li></ul> |
|---|---|
| ICT staff, system administrators & business system owners | <ul><li>business system owners are to ensure that record keeping functionality is addressed in ASICs requirements for any information systems purchased, developed and implemented and must recommend their system for inclusion in the authorised business information and corporate recordkeeping systems.  The recommendation must document how the system meets ISO 16175.</li><li>must maintain the technology used to support systems that capture and keep records electronically ensuring that all information is reliable, available and accessible to staff when required.</li></ul> |
| Decision makers for system procurement and implementation | <ul><li>are to comply with all relevant standards, guidelines and policies on digital transition and enterprise content management in regards to the procurement and development of business information systems .</li></ul> |
| Managers/Officers responsible for engaging and managing contracted service providers | <ul><li>are to ensure that ASIC's digital transition and enterprise content management requirements are identified.</li><li>must include digital transition and enterprise content management standards in each of the contracts, clarifying ownership of the intellectual property, privacy and confidentiality issues plus the digital transition and enterprise content management obligations of the contractors.</li></ul> |
| Boards, Working Parties and Project Teams (Chair or Project Manager) | <ul><li>must be responsible for the management of board records;</li><li>are to comply with all relevant standards, guidelines and policies on digital transition and enterprise content management in regards to records of the board, working party or project team;</li><li>must create and keep full and accurate records of all board, working party or project team meetings; and</li><li>must register all meeting papers in an authorised business information system or the corporate recordkeeping system (including all agendas, agenda papers, minutes, reports and decision pages)</li></ul> |

## Monitor and review

20.     Staff and system compliance with this policy should be regularly monitored. Following established procedures, monitoring activities should be carried out by supervisors, the Information Resource Centre and by senior management through the Audit Committee.

21.     The Information Resource Centre will review this Policy every three years, or earlier if required.

# C    Key terms

The definitions in *AS ISO 15489 Records Management* and the *Archives Act 1983* apply to this policy. In addition the following definitions are applicable:

| Term | Meaning in this document |
|---|---|
| Active records | Current records required for the day-to-day functioning of ASIC. |
| Business Information Systems | Systems that create, keep and manage digital records and metadata (information about records), or manage metadata only while the records are held elsewhere. Examples include: finance systems, personnel systems, workflow systems, and core business systems, such as case management systems or ministerial correspondence systems. |
| Corporate recordkeeping system | An automated system used to manage the creation, use, maintenance and disposal of electronic and physical records, documents and content for the purposes of providing evidence of business activities. It maintains appropriate contextual information (metadata) and links between records, documents and content to support their value as evidence. |
| Digital Transition | Digital transition is the process of adopting digital records management practices. Almost all records are created digitally. In some cases records need to be kept in paper format, but these instances are rare. Digital information is often copied to paper unnecessarily and then has to be stored and managed as duplicate paper records. Aim to keep records in their digital format and, where possible, to scan incoming paper records. |
| Disposal | A range of processes associated with implementing appraisal decisions that include the:<br><br>• retention, deletion or destruction of records in or from recordkeeping systems;<br><br>• migration or transmission of records between recordkeeping systems; and<br><br>• transfer or custody of ownership of records. |
| Electronic records | All forms of electronically generated records including electronic mail, voice messaging, computer and teleconferencing, text or image records created on mobile phones or portable communications devices, videotext on interactive web-based documents and forms, or data retained in databases required for evidential and business purposes. |
| employee or staff | (i)  ongoing and non-ongoing employees of ASIC, SCT and CALDB;<br><br>(ii)  employees of service providers requiring access to security classified information or resources; and<br><br>(iii)  employees of other organisations to which we provide security classified information or resources. |
| Enterprise content management (ECM) | The strategies, methods and tools used to capture, manage, store, preserve, and deliver content and documents related to organisational processes. ECM tools and strategies allow the management of an organisation's unstructured information, wherever that information exists. (*Association for Information and Image Management*) |
| Inactive records | Records no longer required for the conduct of business and which may therefore be transferred to intermediate storage, archival custody or destroyed. (Ellis (ed), *Keeping Archives, p. 472*) |

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|---|---|
| Record | Information created, sent and received in the course of carrying out the business of your agency. Records have many formats, including paper and electronic. Records provide proof of what happened, when it happened and who made decisions. Not all records are of equal importance or need to be kept. *(Adapted from: Archives Act 1983, Part I, Section 3; Standards Australia, AS-ISO 15489, Part 1, Clause 3.15.)* |
| Recordkeeping | The making and maintaining of complete, accurate and reliable evidence of business transactions in the form of recorded information. Recordkeeping includes the creation of records in the course of business activity, the means to ensure the creation of adequate records, the design, establishment and operation of recordkeeping systems and the management of records used in business (traditionally regarded as the domain of records management) and as archives (traditionally regarded as the domain of archives administration). *(Adapted from: Standards Australia, AS 4390, Part 1, Clause 4.19; and Part 3, Foreword.- NAA Glossary)* |
| Records management | Field of management responsible for the efficient and systematic control of the creation, receipt, maintenance, use and disposition of records, including processes for capturing and maintaining evidence of and information about business activities and transactions in the form of records. *(AS ISO 15489 Part 1 Clause 3.16)* |
| Semi-active records | Records that are required so infrequently in the conduct of current business that they can be transferred from offices to secondary storage areas. |
| Vital Records | Vital records are those records that are essential for the ongoing business of ASIC, and without which ASIC could not continue to function effectively. The identification and protection of such records is a primary object of records management and disaster management planning (Ellis (ed), Keeping Archives, p.480). Vital records contain information essential to recreate ASICs legal and financial position and preserve its rights and those of its employees, clients and stakeholders. |