POLICY 2.25
Governance
Records Management Digitisation and Disposal of Source Records

Version: 2**| Next Review:** November 2030

DISTRICT COUNCIL of TUMBY BAY

1. INTRODUCTION

The District Council of Tumby Bay implemented the HP TRIM Electronic Document and Records Management System (EDRMS) in 2016 to transition from the management of predominantly hard copy records to a digital records environment. Since its implementation, the system has evolved into Content Manager, continuing to provide a secure and compliant platform for the capture, management, and preservation of the Council's official records.

2. POLICY OBJECTIVE

The purpose of this Policy is to establish the principles and processes for the digitisation of hard copy records and the management and disposal of the original temporary source records. By ensuring that digitised records are authentic, complete, and reliable representations of the originals, the Council can confidently manage information in electronic format while reducing the need to retain unnecessary hard copy records.

This Policy supports the Council's commitment to protecting the integrity of its records, meeting legislative and compliance obligations, and reducing the costs and administrative burden associated with the storage and maintenance of temporary source records that are eligible for destruction. The Policy applies to the source records created or received by the District Council of Tumby Bay that are digitised for ongoing management within the Council's EDRMS.

3. POLICY SCOPE

All staff are responsible for maintaining appropriate recordkeeping practices within their area of responsibility. This includes ensuring that all official Council records are captured into Content Manager, appropriately actioned where required, and not maintained in separate or unofficial systems.

4. LEGISLATIVE FRAMEWORK

This Policy is to be read in conjunction with relevant legislation, standards, and Council policies, including:

- *State Records Act 1997*
- General Disposal Schedule No. 21 & 40 (GDS 21, GDS 40)
- Digitisation of Official Records and Management of Source Documents
- South Australian Recordkeeping Metadata Standard (SARKMS)
- District Council of Tumby Bay Records Management Policy

The Council has a legislative responsibility to manage and dispose of official records in accordance with the *State Records Act 1997*, which requires that records may only be disposed of under an approved disposal determination.

The application of General Disposal Schedule 40 (GDS 40) (as amended) at the time of record creation enables the identification and management of records with temporary and permanent retention requirements. GDS 40 is the current disposal authority for local government records in South Australia and replaces the former GDS 20.

General Disposal Schedule No. 21 (GDS 21) provides the authority for the disposal of temporary source records after they have been digitised and captured into an EDRMS or other business system with appropriate recordkeeping functionality.

For the purposes of this Policy, source records are the original hard copy records that have been scanned or photographed and captured into the Council's EDRMS. Once digitised and managed in accordance with the requirements of GDS 21, the digital version becomes the official record under the State Records Act 1997, and the source record may be destroyed where all applicable conditions have been met.

5. MANAGEMENT OF SOURCE RECORDS

Source records predominantly consist of hard copy records received, and occasionally created, by Council in the course of conducting its business. These records may be received via mail or hand delivery from stakeholders including residents, ratepayers, Elected Members, clients, contractors, members of the public, Members of Parliament, and government agencies (Commonwealth, State, and Local).

Records requiring capture are scanned and registered into Content Manager. Each digitised record is checked against the original source document to ensure the digital version is a complete, accurate, and reliable representation of the original. Where required, a task is to be assigned within Content Manager to the relevant officer for action. Following scanning and registration, physical source records are placed into the appropriate storage box in accordance with approved records management practices.

All staff are responsible for maintaining appropriate recordkeeping practices within their area of responsibility. This includes ensuring that records are accurately captured, appropriately actioned, and managed within Content Manager in accordance with Council's Records Management Policy.

The Records Management Officer is responsible for authorising the destruction of temporary source records in accordance with GDS 21, where applicable and where all digitisation requirements have been met.

6. ELECTRONIC DOCUMENT AND RECORDS MANAGEMENT SYSTEM (CONTENT MANAGER)

Content Manager (formerly TRIM) is Council's EDRMS and is configured to meet the standards and requirements of State Records of South Australia for a compliant records management system.

The system supports the management of records across their lifecycle, including secure capture, registration, access, retention, and disposal in accordance with the State Records Act 1997 and associated standards.

Content Manager is configured to align with the South Australian Recordkeeping Metadata Standard (SARKMS). Where required metadata fields are not available within the system's standard configuration, additional or user-defined fields have been created to ensure all recordkeeping requirements are met.

Council has an outsourced software support and maintenance arrangement with Civica to ensure system updates, enhancements, and technical support are delivered, maintaining compliance and functionality.

Access to Content Manager is controlled through secure network logon. User permissions are assigned based on roles and responsibilities, ensuring appropriate access to records and preventing unauthorised access, alteration, or destruction of records.

Records within Content Manager are maintained in their native formats and remain accessible over time. Where required, records can be rendered into appropriate formats to ensure ongoing readability and usability.

Where digitisation processes are applied, the destruction of hardcopy source records is undertaken in accordance with GDS 21, subject to Council meeting all required conditions for compliant digitisation and disposal practices.

When permanent records are required to be transferred to State Records South Australia, they will be exported and prepared in accordance with the formats and requirements specified by State Records at the time of transfer, including approved archival formats.

7. SOURCE RECORDS – RETENTION AND DISPOSAL

Source records that have been digitised may be disposed of in accordance with GDS 21, provided that the digitisation process meets all required standards for quality, completeness, and reliability. Once these conditions are satisfied and the digital version is confirmed as the official record, hardcopy source records with temporary retention may be destroyed after digitisation.

There is no mandated retention period following digitisation; however, records must not be destroyed where exclusions apply or compliance conditions have not been met. Permanent value records created from 1 January 2005 may also be considered for destruction following digitisation, where permitted under GDS 21 and subject to all compliance requirements being met.

8. TEMPORARY VS PERMANENT RECORDS

Under GDS 40, records are classified as either temporary or permanent, which determines how long the official (digital) record must be retained.

Temporary records are those with no enduring value. The digital record must be retained for the minimum period specified in GDS 40 (for example, 2, 6, or more years depending on the record type), after which it can be destroyed. The hardcopy source record may be destroyed earlier, after digitisation, in accordance with GDS 21, provided the scanned version is complete, accurate, and captured as the official record.

Permanent records are those with enduring value and must be retained indefinitely as part of the State archive. The digital record must be preserved and eventually transferred to State Records South Australia. The hardcopy source record may be destroyed after digitisation under GDS 21 (generally for records created from 1 January 2005), but only where strict quality, compliance, and eligibility requirements are met. Some records must remain in original format where they have intrinsic physical, legal, or evidentiary value.

9. POLICY REVIEW & EVALUATION

Council will periodically review and evaluate its community engagement practices to ensure they remain effective, proportionate and compliant with legislative requirements.

This Policy will be reviewed at least every four (4) years or as required by legislative change.

10. AVAILABILITY OF POLICY

This Policy will be available for inspection at Council's principal office during ordinary business hours and on the Council's website www.tumbybay.sa.gov.au. Copies will also be provided to interested members of the community upon request, and upon payment of a fee in accordance with Council's schedule of fees and charges.

11. FURTHER INFORMATION

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Next review date	November 2030
Applicable Legislation	*State Records Act 1997* General Disposal Schedule No. 21 & 40 (GDS 21, GDS 40) Digitisation of Official Records and Management of Source Documents South Australian Record Keeping Metadata Standard (SARKMS)
Related Policies	Policy 1.08 - Records Management Policy 2.19 – Records Management (Elected Members)
Related Documentation	

AUTHORITY: Adopted by Council: 13/08/2019 {Motion 7c/82019}
Adopted by Council: 14/07/2026 {Motion 18c/72026]

SIGNED: 

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Responsible Officer

DATED: 14/07/2026

APPENDIX A – Glossary of Terms

Access	Right, opportunity, means of finding, using or retrieving information.
Capture	Deliberate action that results in the registration of a record into a recordkeeping system. For certain business activities, this action may be designed into electronic systems so that the capture of records is concurrent with the creation of records.
Classification	Systematic identification and arrangement of business activities and/or records into categories according to logically structured conventions, methods, and procedural rules represented in a classification system.
Destruction	Process of eliminating or deleting records, beyond any possible reconstruction.
Digitised Version	The scanned version of a hard copy record that is captured into the EDRMS as an electronic record.
Disposal	Range of processes associated with implementing appraisal decisions. These include the retention, deletion or destruction of records in or from recordkeeping systems. They may also include the migration or transmission of records between recordkeeping systems, and the transfer of custody or ownership of records.
Disposal Schedule (GDS)	Formal instrument that defines the retention periods and consequent disposal actions authorised for classes of records that are common to State Government agencies, Local Government authorities or Ministerial offices.
Document	Structured units of recorded information, published or unpublished, in hard copy or electronic form, and managed as discrete units in information systems.
EDRMS	Electronic Document and Records Management System - Information system that captures manages and provides access to records through time.
File	A file which stores one or more documents related to a particular subject/project.
Metadata	Data describing contexts, content and structure of records and their management through time.
Record	Information created, received, and maintained as evidence and information by an organisation or person, in pursuance of legal obligations or in the transaction of business (AS ISO 15489)
Records Management	The discipline and organisational function of managing records to meet operational business needs, accountability requirements and community expectations. (AS ISO 15489 Part 1 General)
Source Record	A document or record that has been copied, converted or migrated or will be the input for such a process. A source record may be an original record or it may be a reproduction that was generated by an earlier copying, conversion or migration process. (NAA)
Transaction of Business	Umbrella term covering all the functions, processes, activities and transactions of the agency and its employees.