



Information and Compliance Management Information Management Policy

Version History

REV NO.	DATE	REVISION DESCRIPTION	APPROVAL
1	11/03/2011	Revision and Update of CO10262979 Information Management Policy Statement AO – IM 01 Sections 1,2,3,5,7,8,12 updated Sections 4,9,10, 11 added Section 6 expanded	06/04/2011

Authorisations

Prepared by	Manager Information Management	04/04/2011
Reviewed by	Manager, Information and Compliance	04/04/2011
Endorsed by	GM Governance	04/04/2011
Authorised by	Chief Executive Officer	06/04/2011
Review Cycle	Biennial	

Contact for enquiries (Policy Owner)

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1. Introduction

The Aurora Energy Group is required to comply with the Tasmanian Archives Act 1983 and the Archives Regulations 2004 and the standards, policies and guidelines issued under it. Good recordkeeping supports the organisation's business needs, compliance requirements under legislative frameworks and the interests of stakeholders.

Aurora Energy Group demonstrates compliance with the Tasmanian Archives Act 1983 and other legislative requirements by implementing and maintaining good recordkeeping and information management practices across all areas and functions of the organisation.

2. Purpose

Aurora Energy Group will establish and maintain an effective and compliant records, information and document management framework that enables information to be used as a reliable basis of vital organisational intelligence and promote a learning organisation, to conduct business more efficiently and effectively, and to support Aurora Energy Group's key functions.

3. Scope

The policy applies to all organisational units within the Aurora Energy Group and to all Aurora Energy Group records, documents and information generated or received by employees and contractors (including, but not limited to full-time, part-time, temporary, casual trainees and consultants) (**Aurora Energy Group Staff**) in the course of Aurora Energy Group business.

4. Policy Revision (Review cycle)

This Policy is to be reviewed and endorsed at least biennially or when there is a significant change to the business, which may impact the policy.

5. Definitions

AET	Aurora Energy Executive Team
Aurora Energy Group ('Aurora Energy')	Includes all legal entities, employees and contractors associated with Aurora Energy Pty Ltd and its subsidiaries.
Aurora Energy Group Staff	The meaning is given in Section 3 above.
Business Classification Scheme	A map of Aurora Energy Group functions and activities derived from an analysis of its business activity. The scheme contains terms and scope notes that represent and describe functions, activities, transactions or other elements and shows their relationships. The structure of the scheme is hierarchical, moving from the general to the specific.
Disposal	Disposal includes destroying or damaging a record, part of a record and abandoning, transferring, selling, donating or giving away a record. Disposal applies to records created and maintained in any format including paper, electronic, photographic, film etc.

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 15489.1-2002) Includes, but is not limited to: anything on which there is writing; anything on which there are marks, figures, symbols or perforations having a meaning for persons, including persons qualified to interpret them; anything from which sounds, images or writings can be reproduced with or without the aid of anything else, or a map, plan, drawing or photograph.
Recordkeeping	The act of making, keeping and preserving evidence of Aurora Energy Group's business in the form of recorded information.
Approved Records Management Systems	There are three types of approved Records Management Systems. <ol style="list-style-type: none"> 1. Document and Records Management System (known as DM) 2. Approved file share for non DRMS compatible spreadsheets. 3. The Aurora Business Management Systems: <ul style="list-style-type: none"> - Customer Care and Billing System - Financial Management System - Human Resources Management System - Works Management System

6. Policy Detail

The intent of this policy is to promote an organisational culture that recognises the strategic importance and the long term value of records and information as key assets vital in supporting the delivery of the Aurora Energy Group's key functions by meeting business, legislative and accountability requirements. This will be achieved by developing, implementing and maintaining standardised recordkeeping practices that promote the sharing of knowledge and support evidence based decision making to deliver high quality advisory, planning, regulatory and educational services.

The Aurora Energy Group operates in an accountable and service based environment. Recent advances in information technology and changes in policy have also seen a marked increase in the number of electronic business transactions. In this changing environment, the Aurora Energy Group is committed to making and maintaining, full and accurate records of its business in all formats.

The most effective support to this commitment is a comprehensive and coordinated records and information management program. The Aurora Energy Group's records and information management program is designed to meet business needs and accountability and compliance requirements, as well as community expectations and cultural obligations which are described below.

Supporting our business

Records are a key ingredient in the support of ongoing business activity. They are evidence of this activity and form the majority of our corporate memory. The Aurora Energy Group is committed to managing its records effectively and efficiently to promote and assist informed decision-making; the consistent, continuous, efficient and productive delivery of services; protection and support in litigation; and the management of risk.

Meeting our accountability requirements

The Aurora Energy Group is required to comply with the Tasmanian Archives Act 1983 and the Archives Regulations 2004 and the standards, policies and guidelines issued under it. Other standards and legislation, such as the *Right to Information Act 2009 (Tas)*, *the Evidence Act 1910*, *Commonwealth Privacy Act 1998*, *the National Electricity Rules and National Electricity (Tasmania) Law pursuant to Electricity National Scheme (Tasmania) Act 1999*, *Tasmanian Electricity Code and Corporations Act* contain recordkeeping and information management requirements. The Aurora Energy Group is committed to meeting all its statutory and accountability requirements.

Fulfilling community expectations and cultural obligations

There are community expectations and cultural obligations associated with recordkeeping and information management activities. To ensure that the public has access to this information in the future, the Aurora Energy Group is committed to preserving and managing its records of continuing value and ensuring their timely transfer to the State Archives. The *Archives Act 1983* stipulates that “relevant authorities must transfer State records more than 25 years old to the Archives Office unless the records have been authorised for destruction or a written exemption has been obtained from the State Archivist”. State records include but are not limited to Aurora Board meeting minutes, contracts registers, authorisations with a permanent retention time, corporate strategic plans and asset registers belonging to the distribution network function.

The records and information management framework will conform to the following principles

- a. The Aurora Energy Group's records and information management must be compliant with regulatory and business requirements.
- b. The Aurora Energy Group's records and information management framework must be monitored and audited to ensure compliance with regulatory and business requirements, and to facilitate opportunities for business improvement.
- c. Responsibility for the Aurora Energy Group recordkeeping must be communicated and formally assigned to all employees (including, but not limited to full-time, part-time, temporary, casual, contractors, trainees and consultants) Recordkeeping activity must be implemented and maintained by those responsible for the development and maintenance of the records and information management framework.
- d. The Aurora Energy Group records and information management framework is to be managed through development, implementation and maintenance of 'fit for purpose' processes and systems.
- e. The Aurora Energy Group records and information management framework has security requirements (both physical and technology related) identified and applied to mitigate unauthorised access, damage and misuse of records to ensure both physical and electronic records are authoritative and credible. The Aurora Energy Group records and information management technology is maintained and supported to ensure reliable usage for all staff, security protection from unauthorised access and physical locations are to be maintained to provide sufficient deterrent for theft and misuse of assets. In addition, housekeeping practices should focus on minimising the theft or misuse of sensitive hard copy information
- f. The Aurora Energy Group records and information management framework has processes put in place to create, store and maintain records (including web pages and associated on-line resources) to allow a comprehensive capture of business activities undertaken by Aurora Energy Group records and information management.
- g. The Aurora Energy Group records and information management framework consists of an approved Business Classification Scheme, Retention and Disposal Schedule and Metadata that captures the full and accurate context of records to certify the evidential integrity of both physical and electronic records.

7. Key Stakeholder Responsibilities

Chief Executive Officer

Accountable for establishing and maintaining the Aurora Energy Group Records and Information Management Framework

General Manager Governance

1. Provide appropriate resources to maintain the Aurora Energy Group Records and Information Management Framework.
2. Assign recordkeeping responsibility across the Aurora Energy Group.
3. Accountable for approving the disposal of Aurora Energy Group records in accordance with an approved Archives Retention and Disposal Schedule.
4. Accountable for approving the extension of retention periods of Aurora Energy Group records required for further business reference.
5. Accountable for approving and changing restricted access periods and making determinations on access to restricted records.
6. Accountable for providing training to communicate requirements under the Policy.

8. Key Responsibilities section

Senior Managers (including AET)

1. Ensure all records created and managed by the business area under their control are managed in accordance with the Aurora Energy Group Records and Information Management Policy and Procedure, standards and guidelines.
2. Ensure all staff under their control are aware of their responsibilities in relation to the Aurora Energy Group Records and Information Management Policy and Procedure, standards and guidelines.

Information and Compliance Management Group

1. Lead the development of the Aurora Energy Group Records and Information Management Framework.
2. Monitor and audit the Aurora Energy Group Records and Information Management Framework for compliance and business effectiveness and report performance and any non conformance to the GM Governance.
3. Provide strategic direction and authoritative advice on records and information management strategies to the Aurora Energy Group
4. Develop and maintain the Records and Information Management tools including the Aurora Energy Group Business Classification scheme (BCS) and Retention and Disposal Schedule.
5. Liaise with the Facilities Group to ensure that physical locations are maintained to provide sufficient deterrent for theft and misuse of assets.
6. Promote housekeeping practices to minimise the theft or misuse of sensitive hard copy information

Aurora Energy Group Staff

1. Be aware of their recordkeeping responsibilities.
2. Ensure work practices align with the Aurora Energy Group Records and Information Management Policy and Procedure, standards and guidelines.
3. Ensure records under their control are identified and captured.
4. Ensure lawful disposal of public records under their control.
5. Ensure appropriate security and controls for records and information under their control.
6. Safeguarding Aurora Energy Group's information i.e. – use of password protected screen savers where appropriate and locking away hard copy confidential information
7. Any record produced or received by Aurora Energy Group Staff will be entered into an approved Records Management system. Hard copy will be filed on an Aurora Energy Group file in accordance with the Information Management Procedures.
8. No Aurora Energy Group Staff will store company records on their own personal filing system either electronic or hard copy.
9. Aurora Energy Group Staff will be allocated limited space on the Records Management System for storage of personal and non-business related information. However, employees are encouraged to store personal information on alternative media.
10. Confidential and sensitive records in either electronic or hard copy are to be protected against theft, vandalism, abuse and deterioration by being appropriately access controlled and stored in Aurora Energy Group Energy's Record Management System, lockable cabinets, lockable offices or the secure storage area managed by Information Management.
11. Aurora Energy Group Staff should assess the access risk of confidential and sensitive records and, where applicable, should adopt a 'clean desk policy' for hard copy files to ensure confidentiality. All Aurora Energy Group Staff must maintain the privacy of business information and protect it from disclosure. Much of Aurora Energy Group's information relates to customers, who expect, on both legal and ethical grounds, that this information be protected.
12. Aurora Energy Group Staff must compile and maintain all records fully and accurately and ensure they are properly secured. In particular:

The Corporations Act (Section 184(3)) prohibits a director, employee or officer from using information obtained in their position with a company from dishonestly:

- with the intention of directly or indirectly gaining an advantage for themselves, or someone else or causing detriment to the corporation;
- recklessly as to whether the use may result in themselves or someone else directly or indirectly gaining an advantage, or in causing detriment to the corporation.

The Aurora Personal Code of Conduct requires that the security and privacy of all confidential information received in the course of work is maintained. This requires that appropriate access rights are set for information so that only those requiring access are given access. The Conflict of Interest policy requires that staff use information available to them solely for designated Aurora Energy Group duties.

13. Aurora Energy Group's records are to be kept accessible and retrievable through Aurora Energy Group's Record Management System. Access to information is in accordance with the Information Management procedures.
14. Disposal of Aurora Energy Group's records will comply with Aurora Energy Group's Disposal Schedule.

9. Non-compliance with this Policy

Incidents of wilful non-compliance with this Policy are considered to be serious and will be dealt with in accordance with the Company's normal performance management process, which may include dismissal.

10. Whistle blowing Statement

*In extreme circumstances an individual may be concerned that a serious breach of this policy has occurred but be in a position where he or she believes that it would be personally damaging to pursue it through normal channels. In such circumstances the individual should contact the protected disclosure coordinator as outlined in the Public Interest Disclosure Act Procedures (Whistleblowers) available on the Intranet. The **Protected Disclosure Coordinator** will do all that is possible and practicable to ensure the identity of the individual and the identity of the person who is the subject of the disclosure are kept confidential.*

11. Point of Contact

The contact for this Information Management Policy is the Manager Information Management.

12. References

Including, but not limited to:

Corporations Act 2001 (Commonwealth)
Right to Information Act 2009 (Tasmania)
Evidence Act 1910
Archives Act 1983 (Tasmania)
Relevant Privacy Legislation
Tasmanian Electricity Code
Commonwealth Privacy Act 1998
The Personal Information and Protection Act 2004
The Public Interest Disclosures act 2002
The Electricity Supply Industry expert panel Act 2010
The Ombudsman Act 1978
National Electricity Rules
National Electricity (Tasmania) Law pursuant to Electricity National Scheme (Tasmania) Act