

# Records Management Procedure

## Purpose

The purpose of a clear approach to records management is to support the continuing conduct of business, comply with the regulatory environment, and to provide necessary accountability. Peoplebank is committed to maintaining all data and records in accordance with statutory and customer requirements. We will maintain authentic, reliable and usable records, and will protect the integrity of those records for as long as required.

## Scope

This procedure applies to records generated by the business whilst undertaking normal business activities. This procedure is intended to include the general collection and management of personal information collected from individuals.

Management of personal information is specifically addressed in the Privacy Policy, Privacy Collection Notice and Privacy Management Procedures.

The Data Cleansing Procedure sets out the approach to destroying and/or de-identifying both records generated by and personal information collected by the business.

## Responsibilities

All managers and staff should maintain records of their activities which are reliable and accessible by the business.

## Definitions

Refer Privacy Management Procedure.

## Background

Records are created, received and used in the conduct of business activities. A record can be files, emails, notes, letters, policies, videos, documents or any form of communication.

The characteristics of a record are:

- ▶ **Authenticity** – an authentic record is one which can be shown to be what it purports to be; to have been created or sent by the person purported to have created or sent it and at the time it purported to be created or sent.

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- ▶ Reliability – a reliable record is one which can be trusted as a full and true representation of the business activities it records.
- ▶ Integrity – the integrity of a record refers to it being complete and unaltered.
- ▶ Usability – a record is useable when it can be located, retrieved, presented and interpreted.

## Records Capture

Peoplebank requires, in addition to other information generated through the normal course of business, that the following critical records be made and retained:

- ▶ Contact details for customers and staff
- ▶ Records of customer contact
- ▶ Records from screening candidates
- ▶ Financial records
- ▶ Placement and other operational records
- ▶ Business agreements and contracts
- ▶ Decisions from meetings
- ▶ Correspondence including mail and email

Records may be created in:

- ▶ Electronic records, or
- ▶ Hard copy of paper-based format

Records will be captured in a manner which is:

- ▶ Timely – records should be created within a short time from the event or activity to which it relates
- ▶ Accurate – records should be a fair and accurate reflection of the event or activity

We will also collect personal information for the work seeker, referees and clients. Procedures for management of personal information are set out in the Privacy Policy, Privacy Collection Statement and Privacy Management Procedures.

## Records Storage

Electronic records will be stored in the Peoplebank computer systems, which includes:

- ▶ Server
- ▶ Recruitment database

Hard copy records will be stored in the Peoplebank filing cabinets.

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Electronic records should not be stored in personal storage systems held by individual staff, such as on personal hard drives, in personal email programs or staff laptops. Hard copy records should not be stored in personal filing cabinets.

All records will be appropriately labelled and indexed.

Where appropriate, electronic records will have an effective time and date stamp feature.

## Folder Structure

The Peoplebank database contains links to candidate, job and client files that are stored on the server. These documents are sourced through the database, so the folder structure on the server does not need to support user searches for files. Instead, the folder structure has been designed to support easy identification by age and type, so the files can be archived and removed as required by the Retention Policy.

The parent folder structure on the server is as follows:

- ▶ Staff
- ▶ Recruitment
  - Candidates
    - Personal
    - Sensitive
    - Business
  - Clients
    - General
    - Contract
- ▶ Finance
- ▶ Candidates
- ▶ Sales & marketing
- ▶ IT & Admin
- ▶ Business Management
- ▶ QSE (quality, safety, environmental management)

## File Naming Protocol

- ▶ Candidate files will be saved in the format **Name Code Content XXX**, where;
- ▶ **Name** is the candidate's name first name (in full or initials) then surname (in full)
- ▶ **Code** is the unique candidate code generated by Bullhorn (our recruitment database)
- ▶ **Content** is a brief description of the contents such as identity (including passport, visa), CV, References, Licenses etc.

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- ▶ **XXX** is any additional information required such as ExpiresSep20 to indicate a license or visa expiry date.

## Records Security

Records shall be secured from unauthorised access and/or amendment. Electronic records will be secured by:

- ▶ Establishing user access and password
- ▶ Restricting access of selected records to nominated users
- ▶ Restricting amendment authority to nominated users
- ▶ Ensuring electronic records are backed up on a regular basis

Refer to IT Policy Manual for more information on data security.

Where records and personal information are held electronically "in the cloud", confirmation of the security procedures and practices of the manager of the host server will be obtained and recorded. Records may not be stored where there are any concerns by Peoplebank that the level of security is less than adequate.

Hard cop records will be secured by:

- ▶ Locking filing cabinets
- ▶ Ensuring files are secured from public access.
- ▶ Applying a "clean desk" approach so that records do not remain on desks which are unattended, particularly overnight.
- ▶ Scanning and storing critical records as electronic records.

Records should not be removed from Peoplebank offices without prior management approval.

Content of records should not be discussed with external parties without prior management approval. Refer to the Confidentiality Undertaking.

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## Retention Periods

We retain information you provide to us and which we collect about you, including Personal Information and Personal Data, for so long as we continue to provide services to you and specifically until such time as you request us to delete your Personal Information and Personal Data