

# Corporate Records Management

## Department of Health Policy

QH-POL-467:2019

### 1. Statement

The Department of Health (the Department) recognises the value of corporate records as a dynamic source of organisational knowledge which underpins and supports the facilitation and provision of high quality, evidence-based health care services. It is committed to meeting its obligations under the *Public Records Act 2002* to make, manage and keep, full and accurate records that are reliable and provide authentic evidence of business activities and decisions.

This policy identifies the overarching principles for the management of corporate records. It is part of the [Corporate Records Management Policy Framework](#) which exists to ensure records are made, kept, and where possible, disposed appropriately.

### 2. Purpose

The purpose of this policy is to foster an organisational culture that recognises the value of recordkeeping practices to promote records as a critical asset of the organisation, essential to support business activities to meet business, legislative and accountability requirements. The policy aims to ensure:

- accountability and increased efficiency including reducing time spent finding records and enhancing information sharing within the Department (where possible and lawful)
- compliance with the *Public Records Act 2002*, in addition to other policies, standards or guidelines made by the State Archivist about the making, keeping and disposal of records
- consistent application of the principles within the Queensland State Archivist's Records Governance Policy and other relevant Queensland Government policies and information standards
- that all employees, contractors and consultants of the Department are aware of their recordkeeping responsibilities.

### 3. Scope

This policy applies to all employees, contractors and consultants working within, or for, the Department. It applies to:

- corporate records – it does not include clinical records
- all formats (physical and digital) regardless of the system in which they are maintained.

This policy may be adopted, or re-branded, for use by Hospital and Health Services (HHS) or statutory bodies.

## 4. Principles

The following principles are consistent with the Queensland State Archives (QSA) – Records Governance Policy.

- **Create and keep** – full and accurate records that provide reliable and authentic evidence of business activities and decisions, in a manner that complies with relevant laws.
- **Capture** – records into an approved recordkeeping system or approved business system, in a manner that complies with relevant laws.
- **Secure** – records against unauthorised access, disclosure, modification, loss or damage.
- **Maintain and preserve** – records that are fit-for-purpose, discoverable and accessible, for use and re-use for as long as they are required to be kept for business, legal and legislative purposes.
- **Dispose** – records in accordance with legislative requirements and only upon receipt of Chief Executive (or authorised delegate) approval.

## 5. Legislation

- **Queensland Government Legislation:**
  - *Electronic Transactions (Queensland) Act 2001*
  - *Evidence Act 1977*
  - *Financial Accountability Act 2009*
  - *Financial and Performance Management Standard 2019*
  - *Hospital and Health Boards Act 2011*
  - *Information Privacy Act 2009*
  - *Public Health Act 2005*
  - *Public Records Act 2002*
  - *Public Service Act 2008*
  - *Right to Information Act 2009*
- **Queensland Government Policies and Standards:**
  - Information Access and Use Policy (IS33)
  - Information Asset Custodianship Policy (IS44)
  - Information Security Policy (IS18:2018)
    - Queensland Government Information Security Classification Framework
  - Private Email Use Policy
  - Queensland Recordkeeping Metadata Standard and Guideline
  - Records Governance Policy
    - Records Governance Policy – Implementation Guideline
- **Queensland State Archives:**
  - Disposal Freeze Policy
  - Dispose of Source Records Guideline
  - General Retention and Disposal Schedule
  - General Retention and Disposal Schedule for Digital Source Records
  - QSA Records Storage Standards

## 6. Supporting documents

- **Corporate Records Management Policy Framework:**
  - Corporate Records Management Policy (this document)
  - Corporate Records Roles and Responsibilities Standard
  - Creation of Corporate Records Standard
  - Use of Corporate Records Standard
  - Digitisation Disposal of Corporate Records Standard

- Disposal of Corporate Records Standard
- Identification of Corporate Records Guideline
- Data Entry and Naming of Corporate Records Guideline
- Disposal of Corporate Records Guideline
- **Other Related Documents:**
  - Clinical Records Management Policy
    - Retention and Disposal of Clinical Records Standard
  - Code of Conduct for the Queensland Public Service
  - Information Security Policy
    - Information Security Standard
    - Information Security Roles and Responsibilities
    - ICT Physical Access Security Standard
  - Data and Application Custodianship Policy
    - Data and Application Custodianship Roles and Responsibilities
  - Electronic Approval Policy
    - Electronic Approval Guideline
    - Electronic Approval Impact Assessment
  - Instrument of Delegation for the *Public Records Act 2002*

## 7. Definitions

Term	Definition
Application Custodian	<p>A position designated with overall accountability and responsibility for decision making in relation to the ongoing development, management, compliance, care and maintenance of an application to support business needs.</p> <p>See also: <i>Data Custodian; Approved Business System</i></p>
Approved Business System	<p>An approved business system (for the purpose of recordkeeping) is a system that has been assigned a Data Custodian and/or Application Custodian in accordance with the Data and Application Custodianship Policy.</p> <p>Custodians are responsible for understanding, managing and controlling risks associated with applications and the collections of data held within these applications. They are also responsible for ensuring that legal, regulatory, policy, standards and other business requirements of the application continue to be met.</p> <p>See also: Application Custodian; Data Custodian</p>
Approved Recordkeeping System	<p>An approved recordkeeping system refers to the Department's electronic Document and Records Management System (eDRMS) or legacy Records Management System, RecFind.</p>
Chief Executive	<p>The Executive Officer means the Director-General, Queensland Health, who has ownership of all Queensland Health records, and is responsible for records in the custody of the Department of Health.</p> <p>The Chief Executives of the Hospital and Health Services (HHSs) are responsible for the custody and disposal of records in their HHS.</p>
Clinical Records	<p>A collection of data and information gathered or generated to record the clinical care and health status of an individual or group. Also referred to as a health record, medical record or healthcare record. Refer <a href="#">Clinical Records Management Policy (QH-POL-280:2014)</a>.</p> <p>See also: <i>Corporate Records</i></p>
Confidential Information	<p>In this policy, confidential information has the same meaning as 'confidential information' in the <i>Hospital and Health Boards Act 2011</i>, namely:</p> <p><b>confidential information</b> means any information that --</p> <ul style="list-style-type: none"> <li>(a) is about a person who is receiving or has received a public health sector health service; and</li> <li>(b) could identify the person.</li> </ul> <p>Confidential information most often relates to patients of Queensland Health (including deceased persons) and can</p>

Term	Definition
	<p>include information such as patient UR number, name, address, date of birth, admission and discharge dates, billing information, Medicare number, medical record and referrals (note this list is not exhaustive).</p> <p>For further information, you can refer to the Department's <a href="#">Confidentiality General Principles</a> to understand the duty of confidentiality and the circumstances when 'confidential information' may be disclosed.</p> <p>It is an offence to disclose 'confidential information' about a person unless one of the exceptions in Part 7 of the HHB Act applies.</p> <p>See also: <i>Information Privacy; Personal Information; Right to Information</i></p>
Corporate Records	<p>Records that provide evidence of administrative and non-clinical functions of the Department (e.g. executive correspondence, finance, human resource, legal, research, scientific, cancer screening etc.).</p> <p>See also: <i>Clinical Records</i></p>
Corporate Records Management	<p>The application of efficient and systematic controls for the creation, receipt, maintenance, use and disposal of Corporate Records.</p>
Data Custodian	<p>A position designated with overall accountability and responsibility for decision making in relation to the data set, data collection and / or application allocated and the ongoing capture, compliance, development, management, care and maintenance of data to support business needs.</p> <p>See also: <i>Application Custodian; Approved Business System</i></p>
Digital Records	<p>Records created, communicated and/or maintained by means of electronic or computer technology, including both 'born digital' records and records that have been digitised.</p> <p>See also: <i>Physical Records</i></p>
Disposal	<p>In this policy, disposal has the same meaning as 'disposal' in the <i>Public Records Act 2002</i>, namely:</p> <p><b>disposal, of a record, includes--</b></p> <p>(c) <i>destroying, or damaging the records, or part of it; or</i></p> <p>(d) <i>abandoning, transferring, donating, giving away or selling the record, or part of it.</i></p> <p>Records disposal includes the following activities:</p> <ul style="list-style-type: none"> <li>• <b>Destroy:</b> complete and irreversible physical erasure of the record, ensuring it cannot be reconstituted, recreated or reconstructed</li> </ul>

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	<ul style="list-style-type: none"> <li>• <b>Transfer:</b> permanent transfer to another public authority because of a machinery-of-government change</li> <li>• <b>Sell:</b> records cannot be sold, except if an agency or function is sold or privatised (i.e. under a machinery-of-government change)</li> <li>• <b>Donate:</b> giving records to a museum or historical society must be authorised by the State Archivist</li> <li>• <b>Loss or damage:</b> because of a disaster or other circumstances beyond your agency's control, such as contamination</li> <li>• <b>Abandon:</b> neglect, which can lead to loss or damage to records, is a form of disposal</li> <li>• <b>Amend:</b> unauthorised changing of a record by addition, deletion, revision or obliteration of information, particularly if it modifies the meaning or intent of the record's content or renders it unusable.</li> </ul>
Electronic Records	See: <i>Digital Records</i> .
Information	<p>Information is any collection of data that is processed, analysed, interpreted, classified or communicated in order to serve a useful purpose or form. This includes presentation in electronic (digital), print, audio, video, image, graphical, cartographic, physical sample, and textual or numerical form.</p> <p>For the purpose of this document the terms, data, information and records are considered synonymous.</p>
Information Privacy (IP)	<p>Information Privacy for Queensland Government is legislated through the <a href="#">Information Privacy Act 2009</a> (IP Act) which recognises the importance of protecting the personal information of individuals. Under the IP Act, health agencies must comply with the privacy principles contained in the IP Act, which include the nine National Privacy Principles (NPPs) and provisions regarding contracted service providers and the transfer of personal information out of Australia. These rules govern how personal information must be collected, stored, used and disclosed. The IP Act also allows an individual to seek access to their own personal information or make a complaint about a breach of the privacy principles.</p> <p>See also: <i>Right to Information; Personal Information; Confidential Information</i></p>
Personal Information	<p>Personal information is information or an opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in a material form or not, about a person whose identity is</p>

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	<p>apparent or whose identity can be reasonably ascertained from the information or opinion.</p> <p>See also: <i>Information Privacy; Right to Information</i></p>
Physical Records	<p>A record that is tangible and takes up physical space (e.g. paper, photographs or index cards)</p> <p>See also: <i>Digital Records</i></p>
Record	<p>In this policy, record has the same meaning as ‘record’ in the <i>Public Records Act 2002</i>, namely:</p> <p><b>record</b> means recorded information created or received by an entity in the transaction of business or the conduct of affairs that provides evidence of the business or affairs and includes:</p> <ol style="list-style-type: none"> <li>a) anything on which there is writing;</li> <li>b) anything on which there are marks, figures, symbols or perforations having a meaning for persons, including persons qualified to interpret them;</li> <li>c) anything from which sounds, images or writings can be reproduced with or without the aid of anything else; or</li> <li>d) a map, plan, drawing or photograph.</li> </ol>
Recordkeeping	<p>The making and maintaining of complete, accurate and reliable evidence of business transactions in the form of recorded information.</p> <p>Recordkeeping includes:</p> <ul style="list-style-type: none"> <li>• the creation of records in the course of business activity</li> <li>• the means to ensure the creation of adequate records</li> <li>• the design, establishment and operation of recordkeeping systems</li> <li>• the management of records used in business and as archives.</li> </ul>
Records Management	<p>Field of management responsible for the efficient and systematic control of the creation, receipt, maintenance, use and disposal of records, including processes for capturing and maintaining evidence of and information about business activities and transactions in the form of records.</p>
Right to Information (RTI)	<p>The RTI process established by the Queensland Government aims to give the community greater access to information, and also provides the right to apply for access to government held information, unless on balance it is contrary to the public interest to provide that information. This process is governed by the following two statutory instruments:</p>



Term	Definition
	<ul style="list-style-type: none"><li data-bbox="673 262 1356 353">• <a href="#">Right to Information Act 2009</a> which allows you to apply for access to documents held by Queensland Government agencies</li><li data-bbox="673 371 1356 533">• <a href="#">Information Privacy Act 2009</a> which in addition to the privacy principles, allows individuals to apply for access to, and amendment of, their own personal information held by Queensland Government agencies.</li></ul> <p data-bbox="625 546 1340 604">See also: <i>Confidential Information; Information Privacy; Personal Information</i></p>

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## Version Control

Version	Date	Comments
v0.1	8 February 2019	<i>Initial draft in consideration of changes to Queensland Government policies and information standards.</i>
v1.0	1 July 2019	<i>Approved. Supersedes QH-POL-424:2015 – Recordkeeping.</i>
v1.1	20 October 2021	<i>Approved. Minor amendments (new template and updated references to legislation, standards and policies).</i>
V1.2	25 October 2022	<i>Minor amendments. (Change Branch name as a result of Department of Health’s Business Case for Change from Risk, Assurance and Information Management Branch).</i>

## Business Area Contact

Corporate Information Management is responsible for the strategic direction and support of the Corporate Records Management function of the Department.

Please refer any corporate records management queries, or feedback to:

**Corporate Information Management Unit**

Governance Assurance and Information Management Branch

Corporate Services Division

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