

Corporate records roles and responsibilities

Department of Health Standard

QH-IMP-467-1:2019

1. Statement

Under the provisions of the *Public Records Act 2002* and the *Public Service Act 2008* responsibility for the creation, management, retention and disposal of public records within public authorities is conferred upon the Chief Executive of the public authority.

This standard describes records management roles and responsibilities for employees, contractors and consultants working within, or for, the Department of Health (the Department). It is part of the [Corporate Records Management Policy Framework](#) which exists to ensure records are made, kept, and where possible, disposed appropriately.

2. Scope

This standard applies to all employees, contractors and consultants within the Department of Health divisions and business units.

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

3. Requirements

Position	Role/Responsibilities
<ul style="list-style-type: none"> • Chief Executive 	<ul style="list-style-type: none"> • Data Owner / Information Owner • Responsible under the <i>Public Records Act 2002</i> to ensure the department: <ul style="list-style-type: none"> - makes and keeps full and accurate records of its business activities - has regard to relevant policies, standards and guidelines made by the archivist about the making and keeping of public records. • Responsible under the <i>Public Service Act 2008</i> for ensuring maintenance of proper standards in the creation, keeping and management of public records. • Approval of authorised delegates under the <i>Public Records Act 2002</i>. • Authorise the permanent transfer or receipt of records to, or from, another government or non-government agency. • Authorise the final disposal of corporate records in accordance with current and relevant State Archivist approved disposal authorities.
<ul style="list-style-type: none"> • Senior Officers <ul style="list-style-type: none"> - Deputy Directors General / Divisional Chiefs - Executive Directors - General Managers - Senior Directors - Directors 	<p>All Senior Officers are responsible for:</p> <ul style="list-style-type: none"> • Provision of appropriate resources to maintain corporate records within approved recordkeeping systems or approved business systems within their scope of responsibility • Ensuring all personnel under their supervision: <ul style="list-style-type: none"> - make and keep full and accurate records of business activities - are aware of their responsibilities in accordance with the Corporate Records Management Policy Framework. • Approve digitisation disposal of eligible 'high risk' records. <p>Some Senior Officers have Application Custodian and/or Data Custodian responsibilities in accordance with the Data and Application Custodianship Policy. This includes (but is not limited to):</p> <ul style="list-style-type: none"> • Ensuring the confidentiality, integrity and availability of information assets to satisfy business and legal/regulatory requirements • Ensuring information assets are appropriately security classified and control measures are implemented, including access and authorisation arrangements. <p>The Instrument of Delegation for the <i>Public Records Act 2002</i> identifies some Senior Officers with additional responsibilities to:</p>

Position	Role/Responsibilities
	<ul style="list-style-type: none"> • Determine restricted access periods for Queensland Health records held at Queensland State Archives • Change restricted access periods for Queensland Health records held at Queensland State Archives • Authorise access to restricted Queensland Health records held at Queensland State Archives • Authorise the disposal of records.
<ul style="list-style-type: none"> • Executive Director, Risk, Assurance and Information Management Branch 	<ul style="list-style-type: none"> • Responsible for executive oversight of Corporate Information Management, which includes: <ul style="list-style-type: none"> - Records Management - Privacy and Right to Information. • Compliance Manager for the <i>Public Records Act 2002</i> and the Public Records Regulation 2014. Includes executive oversight of: <ul style="list-style-type: none"> - Records Governance Policy - Records Governance Policy Implementation Guideline. • Compliance Manager for the <i>Right to Information Act 2009</i> and <i>Information Privacy Act 2009</i>. Includes executive oversight of: <ul style="list-style-type: none"> - Information Access and Use Policy (IS33). • Policy Custodian for the Corporate Records Management Policy Framework. • Data and Application Custodian of approved recordkeeping systems.
<ul style="list-style-type: none"> • Director, Corporate Information Management, Risk, Assurance and Information Management Branch 	<ul style="list-style-type: none"> • Responsible for coordinating the Corporate Information Management program, including: <ul style="list-style-type: none"> - Development and maintenance of strategies, processes, applications and tools to support the making and keeping of records - Provision of strategic direction and authoritative records management advice. • Policy Owner for the Corporate Records Management Policy Framework.

Position	Role/Responsibilities
<ul style="list-style-type: none"> Corporate Information Management 	<p>The unit responsible for:</p> <ul style="list-style-type: none"> Managing recordkeeping activities to ensure compliance with legislative and best practice requirements Administering approved recordkeeping systems Monitoring and reporting on compliance breaches under the <i>Public Records Act 2002</i> Developing and implementing the recordkeeping program including the Corporate Records Management Policy Framework Developing and implementing a disposal program Developing and implementing recordkeeping training and awareness programs Provision of authoritative records management advice Key liaison with Queensland State Archives.
<ul style="list-style-type: none"> Managers and Team Leaders (AO8 and below) 	<p>All managers and team leaders are responsible for:</p> <ul style="list-style-type: none"> Ensuring employees under their supervision are aware of their recordkeeping responsibilities and undertake training to ensure records are created and managed appropriately Ensuring that their business area captures records into an approved recordkeeping system or approved business system Ensuring that their business area complies with the mandatory requirements of the Corporate Records Management Policy Framework Reviewing records of their business area that are due for disposal, to ensure there is no business or legal reason for the records to be retained for a longer period of time.
<ul style="list-style-type: none"> Employees <i>(includes contractors and consultants)</i> 	<p>All employees are responsible for:</p> <ul style="list-style-type: none"> Creating full and accurate records of their business activities Capturing records into an approved recordkeeping system or approved business system Ensure records are kept for the required retention period in accordance with an authorised retention and disposal schedule and are not disposed without authorised delegate approval Complying with the mandatory requirements of the Corporate Records Management Policy Framework Complying with the Code of Conduct for the Queensland Public Service, in particular: <ul style="list-style-type: none"> - treating official information with care and using it only for the purpose for which it was collected or authorised - maintaining the security and privacy of records and limiting access to those persons requiring it for legitimate purposes - not using confidential or privileged information to further personal interests.

4. Legislation

4.1. 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*

4.2. Queensland Government Information 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

5. Supporting documents

5.1. Corporate Records Management Policy Framework:

- Corporate Records Management Policy
- Corporate Records Roles and Responsibilities Standard (this document)
- 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

5.2. Other Related Documents:

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

6. 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: <i>Application Custodian; Data Custodian</i></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>
Capture	<p>A deliberate action which 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.</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 Clinical Records Management Policy (QH-POL-280:2014).</p> <p>See also: <i>Corporate Records</i></p>

Term	Definition
Confidential Information	<p>In this standard, confidential information has the same meaning as ‘confidential information’ in the <i>Hospital and Health Boards Act 2011</i>, namely:</p> <p>confidential information means any information that —</p> <p>(a) is about a person who is receiving or has received a public health sector health service; and</p> <p>(b) could identify the person.</p> <p>Confidential information most often relates to patients of Queensland Health (including deceased persons) and can 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 Confidentiality General Principles 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>

Term	Definition
Disposal	<p>In this standard, disposal has the same meaning as ‘disposal’ in the Public Records Act 2002, namely:</p> <p>disposal, of a record, includes—</p> <ul style="list-style-type: none"> a) destroying, or damaging the records, or part of it; or b) abandoning, transferring, donating, giving away or selling the record, or part of it. <p>Records disposal includes the following activities.</p> <ul style="list-style-type: none"> • Destroy: complete and irreversible physical erasure of the record, ensuring it cannot be reconstituted, recreated or reconstructed. • Transfer: permanent transfer to another public authority because of a machinery-of-government change. • Sell: records cannot be sold, except if an agency or function is sold or privatised (i.e. under a machinery-of-government change). • Donate: giving records to a museum or historical society must be authorised by the State Archivist. • Loss or damage: because of a disaster or other circumstances beyond your agency’s control, such as contamination. • Abandon: neglect, which can lead to loss or damage to records, is a form of disposal. • Amend: 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.
electronic Document and Records Management System (eDRMS)	<p>An eDRMS is a system that combines electronic document management with records management functionality by enabling appropriate contextual information (metadata) to support the evidential value of the information. The recordkeeping metadata assist users to find, manage, control and understand the records over time</p>
Electronic Records	<p>See: <i>Digital Records</i>.</p>
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>

Term	Definition
Information Privacy (IP)	<p>Information Privacy for Queensland Government is legislated through the Information Privacy Act 2009 (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>
Information Security	<p>The protection of information from unauthorised use or accidental modification, loss or release. Information security is based on three elements:</p> <ul style="list-style-type: none"> • confidentiality – ensuring information is only accessible to authorised persons; • integrity – safeguarding the accuracy and completeness of information and processing methods; and <p>availability – ensuring authorised users have access to information when required.</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 apparent or whose identity can be reasonably ascertained from the information or opinion.</p> <p>See also: <i>Confidential Information; 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 standard, record has the same meaning as ‘record’ in the <i>Public Records Act 2002</i>, namely:</p> <p>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"> a) anything on which there is writing; b) anything on which there are marks, figures, symbols or perforations having a meaning for persons, including persons qualified to interpret them; c) anything from which sounds, images or writings can be reproduced with or without the aid of anything else; or d) a map, plan, drawing or photograph

Term	Definition
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"> • 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 • the management of records used in business and as archives.
Recordkeeping System	A system capable of capturing, maintaining and providing access to records over time.
Records Management	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.
Restricted Access Period (RAP) / Restricted Records	A set period of time where access to records in the custody of Queensland State Archives is limited. This is usually to protect confidential or sensitive information.
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> <ul style="list-style-type: none"> • Right to Information Act 2009 which allows you to apply for access to documents held by Queensland Government agencies • Information Privacy Act 2009 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. <p>See also: <i>Confidential Information; Information Privacy; Personal Information</i></p>

Version Control

Version	Date	Comments
v1.0	27 March 2020	<i>New standard</i>
v1.1	20 October 2021	<i>Approved. Minor amendments (updated references to legislation, standards and policies).</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

Risk, Assurance and Information Management Branch

Corporate Services Division

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