

# Identification of corporate records

## Department of Health Guideline

QH-GDL-467-1:2020

### 1. Statement

Information is created, or received, as part of everyday business processes. This includes emails, data entered into business systems and databases, audio and video recordings, photographs, manual and electronic transactions, and reports, spreadsheets and other documents created.

A significant proportion of this information and data could be defined as records, given records are based on content (what is being documented), not the format, technology used or where they are located (e.g. business systems, mobile device).

This guideline may be used to assist staff within the Department of Health (the Department) to identify what information and data is, and is not, a record, and where, when and how to prioritise the capture of those records that are not automatically captured into an approved business system. 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 guideline applies to all employees, contractors and consultants working within, or for, the Department (excluding Queensland Ambulance Service). 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.

Compliance with this guideline is not mandatory, but sound reasoning should exist for departing from the recommended requirements within the guideline.

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

## 3. Requirements

### 3.1. What is a record

In this guideline, record has the same meaning as 'record' in the *Public Records Act 2002*, namely:

*"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:*

- 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."*

*Refer to Appendix 1 – Examples of what is and is not a record*

*Refer to Appendix 2 – Tool to identify what is a record?*

### 3.2. What records need to be captured

Formal capture of records includes the recording of metadata describing the content, context and structure of the records into an approved recordkeeping system or approved business system. Records that need to be captured may be:

- **Any format.** Records are records regardless of the format (electronic/digital or physical).
- **Created during the conduct of business.** Many records are created naturally as we conduct business (i.e. write reports, letters, memoranda, emails etc.).
- **Created after the conduct of business.** Some records need to be created specifically to document a decision, action or transaction (i.e. minutes and file notes).
- **Received.** Some records are received from the general public, non-government organisations and other public authorities through the mail or over the counter (i.e. letters and correspondence, forms etc.) or via email and other electronic means (i.e. Dropbox, file transfer protocol etc.).

*Refer to Appendix 3 – What records need to be captured?*

### 3.3. What records do not need to be captured?

The majority of information that you create and receive is likely to be a public record, however some records are only required to be retained for a short time. Records that do not need to be captured into an approved recordkeeping system include:

- Records captured routinely into approved business systems (e.g. S/4 HANA, MyHR, Springboard). Note: This does not include emails and records saved in Network Drives.
- Transitory and short term records.

*Refer to Appendix 3 – What records do not need to be captured?*

### 3.4. Where do I capture records?

Records should be captured into an approved recordkeeping system (if they are not captured into an approved business system). Approved recordkeeping systems include:

- The Department of Health eDRMS
- The Department's legacy RecFind systems.

### 3.5. What records do I need to capture?

The general responsibility for the capture of a record lies with the:

- **Creator of internal records** (records created within and distributed within the Department) e.g. memoranda and briefs.
- **Creator of outgoing records** (records created within and distributed outside of the Department) e.g. outgoing letters, consultation, joint ventures and submissions.
- **Receiver of incoming records** (records created outside of the Department) e.g. incoming records.

*Refer to Appendix 5 – Responsibilities for capturing records*

### 3.6. When should records be captured?

Records should be made simultaneously, or as soon as practicable, following an event, action, approval, decision or communication.

- Records created as part of a business process (e.g. report, letter or email) need to be captured simultaneously, or as soon as possible, after creation.
- Records not created as part of a business process (e.g. meetings or conversations) need to be created and captured as soon as practicable after the event (e.g. in minutes or a file note).

### 3.7. Prioritising the capture of records

Consideration should be given to prioritising the capture of records in accordance with the value of the records (e.g. vital and important records should be captured before useful or non-essential records).

- **Vital records:** Those records that are critical to the operations of the Department and/or are irreplaceable.
- **Important records:** Those records that are important to the operations of the Department and/or can be re-created at cost/with resources.
- **Useful records:** Those records which are useful to the operations of the Department and/or would cause some inconvenience if lost, but are not irreplaceable.
- **Non-essential records:** Those records which would cause little to no impact to the operations of the Department if lost, or unable to be retrieved.

## 4. 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*
- *Public Health Act 2005*
- *Information Privacy Act 2009*
- *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
- Queensland Recordkeeping Metadata Standard and Guideline
- Records Governance Policy
  - Records Governance Policy – Implementation Guideline

## 5. Supporting documents

Corporate Records Management Policy Framework:

- Corporate Records Management Policy
- 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 and Creation of Corporate Records Guideline (this document)
- Data Entry and Naming of Corporate Records Guideline
- Disposal of Corporate Records Guideline

Other Related Documents:

- Data and Application Custodianship Policy
  - Data and Application Custodianship Standard
  - Data and Application Custodianship Roles and Responsibilities

## 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 <a href="#">Clinical Records Management Policy (QH-POL-280:2014)</a>.</p> <p>See also: <i>Corporate Records</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>

Term	Definition
Data Custodian	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. See also: <i>Application Custodian; Approved Business System</i>
Digital Records	Records created, communicated and/or maintained by means of electronic or computer technology, including both 'born digital' records and records that have been digitised. See also: <i>Physical Records</i>
electronic Document and Records Management System (eDRMS)	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.
Evidence	Documentation, records or proof of a business transaction that can be shown to have been created in the normal course of business activities and which are inviolate and complete. It is not limited to the legal sense of the term.
Information	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. For the purpose of this document the terms, data, information and records are considered synonymous.
Metadata	Data that describes the content, context and structure of records. Metadata is structured or semi-structured, descriptive information about a record and usually includes the title of the record, author, date created, any changes to the record, and applicable disposal or sentencing information. Recordkeeping metadata enables a record to be managed over time and assists in identifying and retrieving records and supporting long term record functionality, reliability, and effective preservation or disposal authentication.
Physical Records	A record that is tangible and takes up physical space (e.g. paper, photographs or index cards). See also: <i>Digital Records</i>

Term	Definition
Record	<p>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"> <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>
Recordkeeping System	<p>A system capable of capturing, maintaining and providing access to records over time.</p>
Transitory and Short Term Records	<p>Records that have a low or limited value (and therefore are only required to be kept for a short period of time (e.g. 2 days, 1 week, until business use ceases).</p> <p>They are generally created as part of routine transactional business practices and are not required to support the business functions of an agency. They also have little or no value to the agency or community.</p>

# Version Control

Version	Date	Comments
v1.0	6 April 2020	<i>New guideline</i>
v1.1	20 October 2021	<i>Approved. Minor amendments (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

Department of Health

Phone: (07) 3082 0582

Email: [Records-Corporate@health.qld.gov.au](mailto:Records-Corporate@health.qld.gov.au)

QHEPS: <https://qheps.health.qld.gov.au/csd/business/records-and-information-management>



## Appendix 1 – Examples of records

What is a record	What is not a record
Any data within a database or information system that documents and records business processes or actions (e.g. rates payments, licence applications and approvals, salary payments)	An external database that was used for reference purposes only
Information that has been published on a webpage or website that relates to the business functions of the Department	Drafts of information prepared for publication on a webpage or website that were never circulated for comment, approved as a final version or published
All agendas, minutes and papers that were presented at meetings within the Department	All agendas and minutes from a staff social club meeting
A report or analysis of an external publication	An external publication
Draft documents that contain significant annotations or were submitted for comment or approval by others	Drafts of reports or correspondence that were not circulated internally or externally or finalised
Any internal advertising or training brochures of a work-related event or publication	Any advertising or training brochures from an external provider
An internal media release of a work-related event or incident	Press cuttings and other external media reports relating to the Department and its activities
Handwritten notes that document a decision or action	Routing slips or transmittal sheets that do not add informational content
A message slip when the message relates to the business functions of the Department	A message slip when the message does not relate to the business functions of the Department
Letters or emails from clients requesting information or action	Unsolicited letters or emails advertising products or services
Records generated from a project including project plan, estimates and costing, resource requirements, research materials, spreadsheets, letters, audio-visual materials etc.	Project templates
A work email documenting an action or decision (e.g. email approving purchase of new computers)	An email about an afternoon tea for a work colleague who is leaving

## Appendix 2 – Tool to identify what is a record?

If you are still not sure what needs to be kept, think about the ongoing *use* and *value* (business, legislative, accountability and cultural/historic) of the records as you assess the records using the questions listed below.

Do I need to capture this as a record	Yes	No
Is it created or received in the conduct of work?	<input type="checkbox"/>	<input type="checkbox"/>

If you answered 'No' to the above question, then it **is not required** to be kept as a public record.

If you answered 'Yes' to the above question, proceed below. If you answer 'Yes' to any of the following questions, then it **is required** to be kept as a public record.

Do I need to capture this as a record	Yes	No
Is it something you (or your business area) are required to act upon?	<input type="checkbox"/>	<input type="checkbox"/>
Is it a form that you (or your business area) are required to process?	<input type="checkbox"/>	<input type="checkbox"/>
Is it formal/authoritative advice or guidance to clients (internal or external)?	<input type="checkbox"/>	<input type="checkbox"/>
Is it a formal communication to clients (internal or external)?	<input type="checkbox"/>	<input type="checkbox"/>
Does it authorise an action or transaction?	<input type="checkbox"/>	<input type="checkbox"/>
Does it document an action or transaction?	<input type="checkbox"/>	<input type="checkbox"/>
Is it something I may need to justify my actions?	<input type="checkbox"/>	<input type="checkbox"/>
Does it commit to a financial or business arrangement?	<input type="checkbox"/>	<input type="checkbox"/>
Is it a contract, agreement, or other legally binding document?	<input type="checkbox"/>	<input type="checkbox"/>
Does it include a business decision or directive?	<input type="checkbox"/>	<input type="checkbox"/>
Does it justify or support a business decision or directive?	<input type="checkbox"/>	<input type="checkbox"/>
Is it required by legislation to be kept?	<input type="checkbox"/>	<input type="checkbox"/>
Is it something I have distributed for formal consultation?	<input type="checkbox"/>	<input type="checkbox"/>
Does it relate to, support or document a significant policy change or development?	<input type="checkbox"/>	<input type="checkbox"/>

## Appendix 3 - What records need to be captured?

Formal capture of records includes the capture of metadata describing the content, context and structure of the records into an approved recordkeeping system or approved business system. Most of the information that you create and receive is likely to be a public record.



### ...capture a decision

- policies/procedures
- file notes
- meeting minutes
- leave applications
- discussion papers
- plans
- authorisations
- business cases
- finance approvals
- recruitment and selection documentation
- approved CAD drawings

*includes records listed under  
...capture action taken*



### ...capture action taken

- internal/external advice
- consultation reports, feedback requests, public enquiries
- invoices for payment
- interactions – rights and entitlements of individuals and communities
- research – reports and data
- drafts – at key milestones (e.g. consultation, approval) that show change in direction, significant feedback or comments
- legal agreements

*includes records listed under  
...capture a decision*



### ...created, received or kept to meet

- legal requirements - needed for future legal/disciplinary action (e.g. licences, permits, contracts, advice, application assessments)
- community expectations - value to community groups (e.g. registration forms, reports, protective clothing logs, consultation)
- business requirements - support decisions and actions (e.g. service contract, general ledger, advice, expenditure approvals)



### ... records of all formats

- digital records (emails, spreadsheets, word documents, social media etc.)
- electronic records (microfilm, microfiche, analogue audio and video tapes etc.)
- paper-based records (photographs, paper forms, hand-written and typed correspondence, reports etc.)
- files published on websites

Note: This is not an exhaustive list

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# Appendix 4 – What records do not need to be captured?

Records that do not need to be captured include:

- **Non-work activities:** Personal information which does not record your work activities, such as personal emails and messages.
- **Transitory and short term records:** Records that can be destroyed once use ceases and do not need to be captured into a formal recordkeeping system. For the full listing of transitory and short term records refer to the [General Retention and Disposal Schedule](#).

## Transitory and short term records

**ADMINISTRATIVE ARRANGEMENTS.** Arrangements undertaken in the course of daily business:

event confirmations/registrations, attendance, guest lists, seating plans | invitations | schedule of fees and charges | running sheets and checklists | surplus blank and obsolete forms | bookings: venue, catering, photographer, equipment, accommodation, transport, speakers etc. | arrangements for staff attendance at training | equipment and property booking forms

**COPIES.** Copies of information/records (in any format) of a master record where nothing has been added, annotated, changed or deleted and the copies have been created, distributed, and used only for reference purposes such as:

if paper version is the official record, unaltered electronic copies | reference copies | if electronic version is the official record, printed summaries or extracts | copies already captured into recordkeeping system (e.g. emails, docs in shared drives)

**DRAFTS, WORKING NOTES AND CALCULATIONS.** Drafts of records (in any format) created as preliminary versions that do not contain significant or substantial changes or annotations that provide insight into the evolution of the final version:

working notes, calculations and research incorporated into subsequent drafts or final documents | unused reference material | drafts with minor edits (e.g. spelling and grammar) | drafts, recordings and shorthand notes used to prepare other documents | calculations, statistics or figures | drafts where no final version is created | spreadsheets and documents incorporated into another document

**EXTERNAL REFERENCE INFORMATION.** Solicited and unsolicited information and items received from external sources and kept solely for reference:

advertising, promotional and marketing of goods and services | media reports and press cuttings | external publications | unsolicited email (spam) | catalogues and price lists | unsolicited applications/resumes for employment

**ROUTINE COMMUNICATION.** Routine communication of advice and information that is readily available to the public and authorised for unlimited public access such as:

transitory messages (e.g. telephone message slips, with compliments slips) | seasonal greetings | letters of appreciation/sympathy | external survey requests and responses | contact and distribution lists | requests for changes to details (e.g. addresses) | internal circulars, team newsletters, bulletins | letters and responses to enquiries, congratulations and suggestions | listserv messages/discussion threads | provision of routine information (e.g. opening hours) | invitations which are not accepted | requests for promotional material and copies of publications

**Note:** Transitory and short term records may need to be retained longer if there are judicial and litigation proceedings, Commissions of Inquiry, legal action, or any other law or policy requiring the records be retained (e.g. a disposal freeze). Any destruction of records must consider the Information Security requirements (i.e. privacy, confidentiality and any other sensitivity) attributed to the records.

## Appendix 5 – Responsibilities for capturing records

The general responsibility for the capture of a record lies with the:

- **Creator of internal records:** records created within and distributed within the Department
- **Creator of outgoing records:** records created within and distributed outside of the Department
- **Receiver of incoming records:** records created outside of the Department and distributed to one or more people within the Department.

Responsibilities for the capture of particular records types are identified in the below table:

Responsibilities for Capturing Records			
Record Type Responsibilities	Creator (or Delegated Officer)	Receiver (or Delegated Officer)	Info Asset Custodian (Collector/Processor)
Executive Correspondence	✓		
General Incoming Correspondence		✓	
General Outgoing Correspondence	✓		
Forms			✓
Social Media			✓
Audio/Video			✓
Email - Internal	✓		
Email - Incoming		✓	
Email - Outgoing	✓		

The creator (sender) of an internal email is responsible for the capture of sent emails. This includes:

- **Single email:** The sender of the email.
- **An email sequence:** The sender of the first email of a sequence (a sequence is considered an email conversation which contains one or more replies).
- **An email thread:** The sender of the first email of a thread (a diverted/forwarded email) which may result in a new/related issues and which may not include the original sender.

The receiver of an email that originated external to the Department is responsible for the capture of the received email. This includes:

- **Single recipient:** The receiver of the email is responsible for capture.
- **Multiple recipients:** The first listed '@health' recipient in the 'TO' list is responsible for capture.
- **CC and BC recipients:** The nature of 'CC' (carbon copy) and 'BC' (blind copy) suggests the email is for reference and is not required to be actioned.