

Use of corporate records

Department of Health Standard

QH-IMP-467-4:2020

1. Statement

All employees of the Department of Health (the Department) are required to use official resources appropriately in accordance with the Code of Conduct for the Queensland Public Service and various legislative requirements. Appropriate use and maintenance of records ensures that records are fit-for-purpose, accurate, and are accessible to persons with legitimate access requirements.

This standard describes the requirements for ensuring records are appropriately handled and stored to prevent damage or deterioration, maintained for accuracy, and secured against inadvertent loss or disclosure of sensitive records. It is part of the [Corporate Records Management Policy Framework](#) which exists to ensure records are appropriately made, kept, and where possible, disposed.

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

3.1. Access

Access refers to the ability to see and view the metadata and/or the content of records given the privacy, confidentiality and/or sensitivity of the records. Barriers may be physical (i.e. lock and key) and electronic (i.e. permissions and access controls).

- 3.1.1. Creation and management of records must include allocation of information security controls applicable to the security classification of the record in accordance with the Queensland Health Information Security Policy Framework.
- 3.1.2. Security classified records (i.e. private, confidential or otherwise sensitive records) must only be accessed on a 'need to know' basis to fulfil legitimate business duties or contractual obligations.
- 3.1.3. Access to security classified records must be approved by the relevant Data and/or Application Custodian.
- 3.1.4. It is the personal responsibility of employees to apply the need-to-know principle to their duties.

3.2. Use

Use refers to the appropriate handling of the records such that they are protected from loss, damage, deterioration or security breach of private, confidential or sensitive records.

- 3.2.1 To ensure records remain accessible and retrievable, the current location of the records must be updated in the applicable recordkeeping or business system whenever the record is moved:
 - It is the personal responsibility of staff to update the current location of records that enter or leave their possession in the applicable recordkeeping or business system.
- 3.2.2 Records must be handled and used in a manner that prevents damage and deterioration. It is the personal responsibility of staff (including any persons with custody of a record) to:
 - Ensure the safe keeping, proper preservation and return of the record.
 - Ensure records that are more than 30 years old are not damaged unless the person has a reasonable excuse (e.g. authorised disposal).
- 3.2.3 The use of records must comply with information security controls applicable to the security classification of the record in accordance with the Queensland Health Information Security Policy Framework. This includes:
 - Printing, handling, discussing, copying, transmitting or exchanging records.
 - Locking away sensitive records (clear desk) and locking computers and mobile devices (clear desktop) when not in use.
- 3.2.4 Records containing personal information must be used for the purpose for which it is collected or authorised in accordance with the National Privacy Principles (Schedule 4, *Information Privacy Act 2009*). Reasonable steps must be taken to maintain the protection of personal information.

3.3. Disclosure

Disclosure refers to the act of sharing or releasing records to another government agency, non-government organisation or to the general public.

- 3.3.1 Records must not be shared or disclosed unless the request has been directed to, and approved by the relevant authorising officer:
- Chief Executive – Authorisation of requests for information under an act where Chief Executive approval is required (e.g. *Public Health Act 2005* approvals for access to information for research, and the *Hospital and Health Boards Act 2011* for access, use and disclosure of confidential information etc.) as well as any general requests for information from other public authorities or non-government organisations.
 - An Authorised Delegate – Authorisation of requests for information under an act where the Chief Executive has delegated authority (e.g. *Public Records Act 2002* for access to restricted records held at Archives and the *Public Health Act 2005* for approvals for access to information for research etc.)
 - Chief Legal Counsel – Authorisation for provision of information and/or records subject to legal professional privilege.
 - Privacy and Right to Information – Administration and management of applications under the *Right to Information Act 2009* and *Information Privacy Act 2009* for access to and/or amendment of documents in the possession or control of the Department.
 - Confidential Information (*Hospital and Health Boards Act 2011*) – Any records containing ‘confidential information’ (refer to definition) must only be accessed, used or disclosed in accordance with confidentiality provisions under Part 7 of the *Hospital and Health Boards Act 2011*.
 - Confidential Information (other legislation) – Any records containing ‘confidential information’ as identified within the confidentiality provisions of another relevant statute must only be accessed, used or disclosed in accordance with the provisions of within that statute.
 - Data and/or Application Custodians – Authorisation of access to various domains of information and/or records administered by the Department that are not subject to any of the above listed disclosure requirements. Consultation with state-wide data and application custodians may be required in certain instances.

3.4. Storage

In this standard, storage refers to locations and facilities used for keeping records and the conditions required to ensure the records are protected from unauthorised access, damage or deterioration.

- 3.4.1 Storage facilities used for records must be located away from known hazards.
- 3.4.2 Storage facilities must be designed to protect and preserve records (e.g. security protection from unauthorised access and fire detection and suppression systems).
- 3.4.3 Storage facilities must offer appropriate environmental controls to protect records from ultraviolet light, heat and humidity.

Refer to **Appendix 1 – Recommended Environmental Conditions for Storing Records** for more information on appropriate temperature, humidity, shelving and wrappings for records.

- 3.4.4 Analogue records must be packed in appropriate containers and stored on shelving to protect against damage and deterioration (e.g. boxes, map and plan cabinets etc.).
- 3.4.5 Digital records must be stored on approved Departmental media or in approved business systems to ensure the records can be accessed, maintained and preserved for their required retention period.
- 3.4.6 Records must be stored such that they can be easily identified, located and retrieved.
- 3.4.7 Storage facilities must ensure the security of private, confidential and sensitive records.
- 3.4.8 Storage facilities must be included in local disaster management programs.
- 3.4.9 Storage facilities must be monitored and maintained to prevent excessive build-up of dust, dirt and mould or ingress by pests.

3.5. Maintenance

Maintenance refers to actions required to ensure that records are preserved in a useable (fit-for-purpose) state over time.

- 3.5.1. Records must be protected from imminent damage and repaired as soon as practicable after identification of damage.
 - The decision to repair damaged records should consider the effort/cost to repair and the ongoing value of the records.
 - Advice on appropriate treatment of damaged records is available from Corporate Information Management (CIM).
- 3.5.2. Materials that can damage paper records (e.g. metal clips and fasteners such as bulldog clips, sticky tape, some cardboard and plastics, laminates, post-it notes, and sticky tabs) must be removed from long-term temporary (over 30 years) and permanent records.
 - Post-it notes of evidential value should be photocopied and the copy kept with the record.
- 3.5.3. Digital and analogue records must be periodically assessed for obsolescence and where required converted to another format (e.g. an open/open proprietary digital file format).
 - It is the responsibility of an Application Custodian and/or Data Custodian to find and fund a solution that is fit-for-purpose for the minimum retention period that the records must be retained.
- 3.5.4. Notification of damaged records must be provided to CIM as soon as practicable upon identification of the damaged records.

CIM will assess if the records are beyond repair and may need to apply to Queensland State Archives (QSA) to dispose of any irreparably damaged records.

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 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

5. Supporting documents

5.1 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 (this document)
- 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
- 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
- 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*
- QSA – Records Storage Standards
- QSA – Retention and Disposal Schedules

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>
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>
Confidential Information	<p>Confidential information is defined in various statutes including in Part 7 of the <i>Hospital and Health Boards Act 2011</i> (HHB Act) and is information that could identify someone who has received, or is receiving a public sector health service, including deceased persons.</p> <p>Confidential information most often relates to patients of Queensland Health and can include information such as patient UR number, name, address, date of birth, admission and discharge dates, billing information and 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</p>

Term	Definition
	<p>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>
Document	<p>Recorded information or an object which can be treated as a unit. Some documents are records because they have been part of a business transaction or were created to document such a transaction. Conversely, some documents are not records because they do not function as evidence of a business transaction.</p> <p>See also: <i>Record</i></p>
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>
Fit-for-purpose	<p>Fit-for-purpose records are those that are suitable and adequate to be used for the designated role, purpose or business activity for which the record was created or required. A fit-for-purpose reproduction of a record (following migration, conversion or digitisation) is one that is adequate to be used in the same way as the original physical record.</p>

Term	Definition
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 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 • availability – ensuring that authorised users have access to information when required
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>
Queensland State Archives (QSA)	<p>Office established under the Public Records Act 2002 responsible for the development and promotion of effective methods, procedures, and systems for making, managing, keeping, storing, disposing of, preserving and using public records.</p>

Term	Definition
Record	<p>In this standard, record has the same meaning as ‘record’ in the <i>Public Records Act 2002</i>, namely:</p> <ul style="list-style-type: none"> • record 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: <ul style="list-style-type: none"> a) <i>anything on which there is writing;</i> b) <i>anything on which there are marks, figures, symbols or perforations having a meaning for persons, including persons qualified to interpret them;</i> c) <i>anything from which sounds, images or writings can be reproduced with or without the aid of anything else; or</i> d) <i>a map, plan, drawing or photograph.</i>
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.
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 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
v.1.0	6 April 2019	<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

Department of Health

Phone: (07) 3082 0582

Email: Records-Corporate@health.qld.gov.au

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

Appendix 1 – Recommended Environmental Conditions for Storing Records

Permanent Archival Storage and/or Retention				
Record Type	Temp / Tolerance	Humidity / Tolerance	Shelving	Containers / Wrappings / Other
Paper-based Files, Cards, Maps, Plans, Drawings, Charts, Posters, Letters and Documents	18°C–22°C +/- 2°C	45%–55% +/- 5%	Plan cabinets for larger formats (maps and plans etc.)	Type 1 design (or format-specific variations) boxes Paper or cardboard covers, wallets, folders or envelopes Interleave if in drawers or fragile–polyester encapsulate Large formats (maps, plans)–use rigid folders or boards for flat–or roll around a core and wrap
Composite records and objects Bound Volumes and Registers, Parchment, Architectural Models, Scrolls	16°C–20°C +/- 2°C	40%–50% +/- 5%	Store small volumes vertically. Larger volumes can be stored horizontally–up to 2 high Deep shelving or even pallet racking may be used for oversized and heavy objects	Fragile bound volumes require tailor-made boxes or slipcases–no boxing or wrapping required if in good condition Treat parchment as per paper-based but use non-buffered material in contact House objects in standard archive boxes (tailor-made if outsized e.g. scrolls) Heavy objects in crates or on pallets (wood varnished, properly cured and ventilated prior to use to seal against off-gassing) Cover or wrap architectural models to protect from light, dust, pests and scratching (especially if Perspex cover/case)
Photographic prints (B&W)	16°C–20°C +/- 2°C	40%–50% +/- 5%		Non-buffered archival wallets, folders, envelopes boxes, or polypropylene sleeves/albums
Photographic prints (Colour)	8°C–12°C +/- 2°C	30%–40% +/- 5%		Non-buffered archival wallets, folders, envelopes boxes, or polypropylene sleeves/albums
Photographic other Glass Plate Negatives, Lantern Slides	8°C–12°C +/- 2°C	30%–40% +/- 5%	Fixed (i.e. stationary, not mobile) shelving	Individually housed in non-buffered archival folders, wallets and containers Additional shock protection when interleaving and within archival boxes

Record Type	Temp / Tolerance	Humidity / Tolerance	Shelving	Containers / Wrappings / Other
Optical media DVDs, CDs, Blu-ray discs, Laser Discs	16°C–20°C +/- 2°C	40%–50% +/- 5%	Store vertically Do not stack or package in groups	Rigid plastic jewel/polypropylene cases Remove all paper/cardboard Water-base felt tip permanent marker for labelling if necessary
Magnetic media Audio/Video Tapes, Computer Tapes, Floppy Disks, Magneto-Optical Discs	8°C–12°C +/- 2°C	30%–40% +/- 5%	Non-magnetisable shelves/cabinets Store vertically Metal shelves should be earthed	Rigid and inert plastic (polypropylene) cases preferred for tapes and discs Use non-magnetic material (not paper or cardboard) Anti-static bags for media not part of networked storage Disks should remain powered and power variations remain constant Cases should have fittings to hold the tapes in position
Film (stable) Microfilm (rolls, sheet), Motion Picture/Cine, Negatives (rolls, sheet), X-rays, Slides, Overhead Transparencies	8°C–12°C +/- 2°C	30%–40% +/- 5%	Cine films store horizontally– 16mm up to 6 cans high, 35mm up to 3 cans high Store all others vertically	Rolled films on polypropylene cores and in PAT containers Sheet film in inert/PAT plastic sleeves, albums, wallets and boxes
Film (unstable) Cellulose acetate-based media affected by 'vinegar syndrome' Motion picture film, Microfilm, Photographic Negatives, Sheet Film	1°C–5°C +/- 1°C	30%–40% +/- 5%	Cine films store horizontally– 16mm up to 6 cans high, 35mm up to 3 high Store all others vertically	No paper-based containers or other housings Rolled films on polypropylene cores and in PAT containers Sheet film in inert/PAT plastic sleeves, albums, wallets and boxes
Solid state media	16°C–20°C +/- 2°C	35%–45% +/- 5%	Metal shelving must be earthed.	Anti-static bags Power variations must remain constant Do not store below 10°C

Long-term Temporary Storage and/or Retention				
Record Type	Temp / Tolerance	Humidity / Tolerance	Shelving	Containers / Wrappings / Other
Stable material types Paper-based, Composites and objects, Film–stable	15°C–25°C +/- 2°C	40%–60% +/- 5%	See above for corresponding individual format types. Archival materials are preferred but not essential.	See above for corresponding individual format types Archival materials preferred but not essential
Susceptible and at-risk material Photographic, Magnetic Media, Optical Media, Film–unstable	15°C–20°C +/- 2°C	40%–50% +/- 5%	See above for corresponding individual format types. Archival materials preferred but not essential.	See above for corresponding individual format types Archival materials preferred but not essential
Short-term Temporary Storage and/or Retention				
All material types	15°C–25°C +/- 4°C	40%–60% +/- 5%	Storage containers recommended and archival quality materials preferred but not essential.	Storage containers recommended and archival quality materials preferred but not essential