CORPORATE RECORDS MANAGEMENT
POLICY©

DOCUMENT SUMMARY/KEY POINTS

- This policy ensures that full and accurate records of all executive activities and decisions of the Sydney Children's Hospitals Network (SCHN) are compliant with legislation and standards.

- This policy provides guidelines for best practice in recordkeeping.

- This policy provides a framework and outlines responsibilities for the operation of the SCHN Corporate Records Management Program.

- This policy is in line with the whole of government policy on managing information as an asset.

- This document has been authorised by the Chief Executive, SCHN and is available to all staff.

- This policy applies only to Corporate Records and does not apply to patient/client health records which are governed by the Health Records and Information Privacy Act 2002 as well as policies to support this legislation.

Approved by:	SCHN Policy, Procedure & Guideline Committee	
Date Effective:	1st December 2016	Review Period: 3 years
Team Leader:	Manager Executive Service	Area/Dept: Executive Office

CHANGE SUMMARY

- Significant changes have been made throughout the document. It is recommended to read the entire document.

READ ACKNOWLEDGEMENT

- All staff involved in creating or accessing corporate records should read and acknowledge this policy.

Approved by:	SCHN Policy, Procedure & Guideline Committee	
Date Effective:	1st December 2016	Review Period: 3 years
Team Leader:	Manager Executive Service	Area/Dept: Executive Office

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1   Preface

1.1   Purpose

The purpose of the Corporate Records Management Policy is to ensure that full and accurate records of all activities and decisions of the SCHN Executive are created, managed and retained or disposed of appropriately, and in accordance with relevant legislation.

This policy enables the SCHN to achieve information accessibility, business enhancement and improvement. Compliance enables SCHN to meet its business needs, accountability and governance and protects the rights and interests of the Government, the organisation, its staff, clients and the community.

A Records Management Program has been established by the SCHN in accordance with s.12 (2) of the *State Records Act 1998*. This policy provides a framework and outlines responsibilities for the operation of the SCHN's Records Management Program.

All staff are required to comply with this policy in the conduct of official business.

This policy applies to records in all formats, including digital (electronic) records with the exception of records and documents that are contained within a patient/client health record.

1.2   Authority of this policy

This policy has been authorised by the Chief Executive, SCHN and is available to all staff. It has been developed in consultation with staff and will be revised on a regular basis. Ownership of the policy rests with the Corporate Records Manager who is responsible for implementing the Records Management Program within SCHN with regard to compliance and legislative requirements and recordkeeping standards.

1.3   Application of this policy

All staff, including contractors and consultants, must comply with this policy in their conduct of official business for the SCHN. This policy applies to records in all formats, including electronic records.

1.4   Records captured prior to formation of the Sydney Children's Hospitals Network

HP TRIM is an electronic document recordkeeping management system installed at The Children's Hospital at Westmead prior to the formation of the SCHN Network. HP TRIM holds electronic corporate records of The Children's Hospital at Westmead since 2008 and electronic corporate records created at The Sydney Children's Hospital Randwick since 2010 when the SCHN was formed. Records relating to other entities forming the Sydney Children's Hospitals Network are located within their individual business units and not managed by the Corporate Records Manager.

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2 Records as a source

The SCHN recognises that records are a vital asset to:

- Facilitate information accessibility and enhance business by supporting program delivery, management and administration;

- Deliver customer services in an efficient, fair and equitable manner;

- Provide evidence of actions, decisions and precedents for future decision making; and

- Protects the rights and interests of Government, SCHN, patients and community

3 Records Management Program

3.1 Objectives of the Records Management Program

A records management program is a planned, co-ordinated set of policies, procedures, people, systems and activities that are required to manage records.

The SCHN's Records Management Program seeks to ensure that:

- It has the records it needs to support and enhance ongoing business and customer service, meet accountability requirements and community expectations.

- These records are managed efficiently and can be easily accessed and used for as long as they are required.

- Records are stored as cost-effectively as possible and when no longer required they are disposed of in a timely and efficient manner.

- The SCHN complies with all legislative and state government standards as required concerning records and records management practices.

- Records of longer term value are identified and protected for historical and other research.

A goal of particular note is that the organisation is committed, through its Records Management Program, to maintaining digital and other technology dependent records in authentic and accessible form for as long as they are required in accordance with s.14 of the *State Records Act 1998.*

See Appendix A for a list of legislation and government directions and SCHN documents which affect recordkeeping.

3.2 Organisation and management of the SCHN's Records Management Program

Administration and management of the program is the responsibility of the Corporate Records Manager, assisted by Executive Assistants and the Executive Services Manager.

The policy must be implemented in all branches within the Executive Services of the SCHN to support the requirements of this policy.

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If HP TRIM is rolled out to other Units within SCHN, they must also be aware of this policy and agree to its principles.

Responsibilities of all staff, including Directors, include but are not limited to:

- Routinely creating accurate records of activities and decisions.

- Making sure records are captured in the recordkeeping system.

- Ensuring the integrity and safety of Executive Service records.

- Ensuring the security of records accessed via mobile electronic devises are not compromised when accessed outside SCHN.

- Ensuring that Executive Services physical records are not removed from the premises without the prior consent of the Executive Services Manager or the Corporate Records Manager.

- Protecting sensitive records from unauthorised access.

- Ensuring Executive Service's records are not destroyed without appropriate authority.

Record management activities are subject to monitoring and audit activities to ensure ongoing compliance and sustainability.

3.3 Elements of the Records Management Program

Creation and capture

The SCHN has endorsed the use of a number of standard, open source file formats in the IT procedures. These formats have been chosen to streamline the ongoing management of the SCHN records and should be the only formats used for the creation of records.

Staff should ensure that they create official records of all decisions and actions made in the course of their official business. For example, if significant organisational decisions are transacted by telephone, file notes of the key points in the conversation should be documented. Official meetings should include the taking of minutes.

To assist in the responsible creation of records and the capture of essential information SCHN has developed the following:

- Paper and electronic templates

- Definition of recordkeeping requirements and business rules as to what type of document/information is to be captured, e.g. all correspondence, emails, telephone conversations relating to business, etc.

All records, defined by the organisation as important to create, should be captured into SCHN's recordkeeping system (HP TRIM) so they can be managed appropriately.

Records should be placed in an official file. Files (i.e. SCHN containers) are created in HP TRIM and given a unique number. Containers are created within the SCHN's classification scheme. All official outgoing communications, including letters, faxes, emails, etc. should contain reference to the HP TRIM document number, as prompted in the templates.

Whenever new databases and automated systems are being designed, the Corporate Records Manager should be consulted to determine what records should be created and

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captured by the system and the recordkeeping rules and tools that need to be accommodated.

As other units within SCHN request that HP TRIM be introduced into their Unit as their recordkeeping system for specific programs/projects they should consult the Corporate Records Manager for designing and creating a recordkeeping program for them. This ensures that recordkeeping standards are maintained, essential metadata is captured and it is compliant with legislative requirements.

Storage

Current hardcopy documents should be stored in a "boxed" system after being scanned and captured into HP TRIM, so that they are locatable, accessible and their movement can be tracked. These boxed records are to be kept in the Central File Registry, within Executive Services. They will become the responsibility of the Corporate Record Manager and will be disposed of in accordance with State Records guidelines.

Older files belonging to an earlier recordkeeping system, and are still in hard copy files will be destroyed, archived, or kept until their retention period has expired, and then destroyed or archived. They will remain in the Central File Registry until their expiration date.

Old hard copy records held within an office, which are rarely used or are no longer in use for official purposes, are still required to be retained in accordance with the current *Retention and Disposal Authority.* These should be forwarded to the Corporate Records Manager for action. An audit of files in an office within the Executive should be undertaken regularly so that unused files are actioned in a timely manner.

HP TRIM is the official recordkeeping system within Executive Services. No records should be stored permanently on local or network drives, floppy disks, USB keys or any other temporary storage device. These devices can be used for short term storage but must be transferred to HP TRIM as soon as possible. These devices are not to be used for permanent storage of information.

Electronic records may either be stored online (on servers) or offline (on CD ROMs, DVDs, magnetic disks or other removable media). Records of short term value will be disposed of at suitable intervals by the Corporate Records Manager. Records of long term or archival value should be retained online wherever possible and managed in accordance with any *Records Management Procedures*.

Maintenance and monitoring

The location of each record needs to be recorded and updated at every movement of the record. This ensures that records, as assets, can be accounted for in the same way that the other assets of the SCHN are. Staff members should update HP TRIM when passing records on to another staff member.

The Corporate Records Manager is responsible for ensuring that records and environmental conditions are monitored regularly to protect records. This will include checking temperature and humidity levels in dedicated records storage areas for paper records.

Maintenance of electronic records can also entail the migration of data. Migrations must be authorised by Chief Executive and must produce authentic, complete, accessible and useable records.

Disposal

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The SCHN has two authorised Functional Retention and Disposal Authorities relating to public health services, covering its core functions and activities. Administrative records common to all or many public offices such as financial and personnel records are covered under general retention and disposal authorities compiled by State Records NSW. The SCHN recommends that disposal actions are assigned to records in all formats on creation to ensure they are managed appropriately.

No records of SCHN can be disposed of unless in accordance with these retention and disposal authorities or Normal Administrative Practice. Any sentencing of records must be supervised by the Corporate Records Manager. The Corporate Records Manager is responsible for coordinating and managing the disposal of SCHN records. The disposal of records must be documented and approved by the Chief Executive before any disposal takes place.

Any Unit within SCHN that is considering disposing of any records must contact the Corporate Records Manager to ensure that compliance is being adhered to.

Transfers

The SCHN has an on-site storage facility for the storage of physical records that are infrequently used for business purposes but still need to be retained according to the *Retention and Disposal Authority*. The Corporate Records Manager is responsible for transferring these records to the facility.

Records required as State archives in the *Retention and Disposal Authorities* will be transferred by the Corporate Records Manager to State Records NSW when no longer in use for official purposes.

Access

Records must be available to all authorised staff that requires access to them for business purposes. Restrictions/caveats can be applied to electronic records of a highly sensitive or confidential nature. Confidential hard copy files should be stored in a locked cupboard.

All access to SCHN records by members of the public, including Government Information Public Access (GIPA) requests, will be made available in accordance with the NSW GIPA Act, Freedom of Information Act, and Access Directions for those records transferred to State Archives.

4 Roles and Responsibilities

Chief Executive

The Chief Executive (CE) has a duty under Section 10 of the *State Records Act 1998* to ensure organisational compliance with requirements and regulations of the Act.

Directors and Managers

Directors and managers are responsible for supporting the creation, capture, storage and monitoring of records by staff as part of normal business practice. This includes ensuring staff are adequately trained and are aware of their responsibilities.

SCHN Executive Services

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The SCHN Executive Services provide the following services in relation to records management:

- Registering incoming mail to the Executive into the HP TRIM and distributing to action officers; and

- Registering outgoing mail from the Executive into the HP TRIM.

- Capture all correspondence and other documentation created in response to incoming correspondence within their Directorate into HP TRIM.

- Update movement of documents within Executive and support Units.

- Capture/scan signed correspondence back into HP TRIM.

- Update record metadata when needed.

Corporate Records Manager

The Corporate Records Manager is responsible for the records management program within the SCHN and acts as the TRIM Administrator. This position also:

- Maintains and administs the HP TRIM recordkeeping system.

- Develops and maintains procedures around the capture and maintenance of records in the HP TRIM system.

- Provides advice, support and training on record-keeping practices for the capture and maintenance of records in the HP TRIM system to HP TRIM users.

- Monitors compliance with policies and procedures across the SCHN Executive Services and makes recommendations for improvement or modification of practices.

- Designs and advises on recordkeeping systems.

- Establishes and maintains customised recordkeeping business rules regarding metadata.

- Manages the records management software (HP TRIM) and supervises any updates/changes to the system in partnership with SCHN Information Technology Services.

- Consults with SCHN IT for support and advice on technical issues.

- Authorises the disposal of records in accordance with recognised procedures and standards.

- Coordinates a records management program.

- Formulates and maintains classification and retention and disposal authorities.

- Provides in-depth training for all new users of TRIM and provides refreshers when needed.

- Provides training materials and guidelines.

- Keeps up to date with new trends and guidelines in records management.

Staff with access to HP TRIM

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In addition to mandatory requirements outlined in this policy, staff using HP TRIM must also:

- Routinely create full and accurate records of their business activities, decisions and actions.

- Ensure that all records are saved into HP TRIM.

- Ensure physical records are not removed from work areas or taken off-site without authorisation from the Corporate Records Manager or Executive Manager responsible for the records.

Information Services

Information Services staff will work with the staff responsible for corporate records and:

- Provides support and infrastructure to ensure that records kept in electronic form are managed so that they are accessible, readable, inviolate, complete, comprehensive, and authentic for as long as required

- Provide support for any issues that staff have with HP TRIM that has been logged with IT Support

- Implements information security measures

- Performs routine and comprehensive system backups of data

- Provides support and expertise in installing enhancements or upgrades to the recordkeeping system

5   Outcomes

- That the SCHN will fully comply with the State Records Act and regulations.

- That the operations of the recordkeeping system within SCHN follows guidelines and procedures as set out by State Records of NSW and is compliant with Australian and international standards.

- That all the SCHN staff are aware of their responsibilities relating to creating and maintaining Corporate Records, and within other Units where HP TRIM is used.

- Disposal of Corporate Records is undertaken by the Corporate Records Manager in accordance with authorised disposal authorities.

- Efficient record management practices are utilised by SCHN staff.

- All staff using TRIM for recordkeeping, including new staff, are trained on how to use the recordkeeping system used at SCHN.

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Appendix A: Legislation and related documents

- State Records Act 1998 and regulations
- *AS ISO 15489-2002*
- Government Information (Public Access) Act 2009
- Privacy and Personal Information Protection Act 1998
- The Health Records and Information Privacy Act 2002
- Evidence Act 1995
- Public Finance and Audit Act, 1983
- Copyright Act 1968 (Commonwealth)
- The Code of Conduct for NSW Government Sector Employees
- Information and Privacy Commission – various resources for public sector agencies
- NSW Treasurer's Directions
- Good Conduct and Administrative Practice: Guidelines for State and Local Government. 2nd ed. 2006
- Premier's Memoranda and Circulars, including C2003-17, M2007-08
- General Retention and Disposal Authority – Administrative Records (GDA 28)
- General Retention and Disposal Authority – Public Health Services: Administrative Records (GDA 21)
- General Retention and Disposal Authority – Public Health Services: Patient/Client Records (GDA 17)
- General Retention and Disposal Authority – Source records that have been migrated (GA33)
- General Retention and Disposal Authority – Imaged records (GA36)
- The Sydney Children's Hospitals Network Policy Code of Conduct
- The Sydney Children's Hospitals Network Policy Occupational Health & Safety

Note: This list is not exhaustive. It is the responsibility of managers to examine legislation and government directions which govern their activities, and ensure that records arising from these activities conform to recordkeeping requirements.

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Appendix B: Definitions

Access

> Right, opportunity, means of finding, using or retrieving information. AS ISO 15489 Part 1 Clause 3.1

Appraisal

> The process of evaluating business activities to determine which records need to be captured and how long the records need to be kept, to meet business needs, the requirements of organisational accountability and community expectations

Archives

> The records identified as having continuing value after their shelf life

Capture

> This is a deliberate action which results in a record being saved into a recordkeeping system. For certain business activities, this action may be designed into digital systems so that the capture of records is concurrent with the creation of records.

Classification

> Systematic identification and arrangement of business activities and/or records into categories according to logically structured conventions, methods and procedural rules represented in a classification system. AS ISO 15489 Part 1 Clause 3.5

Counter disaster plan

> A plan for measures to be taken for disaster prevention, disaster response and recovery and the protection of vital records

Digital / Electronic Records

> Digital information captured at a specific point in time that is kept as evidence of a business activity. The term 'digital records' covers 'born digital' records such as emails, web pages, digital photographs, digital audio files and database records as well as scanned versions of paper records that have been digitised in business processes.

Disposal

> A range of processes associated with implementing appraisal decisions. These include the retention, deletion or destruction of records in or from recordkeeping systems. They may also include the migration or transmission of records between recordkeeping systems, and the transfer of custody or ownership of records to another organisation.

Disposal Authority

> A policy guideline for the retention and disposal of records approved by the State Records NSW Advisory Committee and determines the time period a record is kept by an agency.

Metadata

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Recordkeeping metadata is data that describes the context, content and structure of records and their management through time. It refers to the record title, its classification, its current home and owner locations, date registered and the applicable retention schedule.

Record

A record is any document or other source of information compiled, recorded or stored in written form, on film, or through electronic means. Records created, received and maintained by The Sydney Children's Hospitals Network staff in the course of organisational operations and activities are official records and are owned by The Sydney Children's Hospitals Network.

Record keeping

Making and maintaining complete, accurate and reliable evidence of business transactions in the form of recorded information.

Recordkeeping requirements

Requirements arising from regulatory sources, business needs and community expectations that identify the types of records that should be created and the management framework needed in order to have accountability and manage all the business information that is necessary for an organisation.

Recordkeeping systems

Information systems which captures, maintain and provide access to records over time.

Records

All information created, received, and maintained as evidence and information by an organisation or person, in pursuance of legal obligations or in the transaction of business.

Any document or other source of information compiled, recorded or stored in written form or on film, or by electronic process, or in any other manner or by any other means. State Records Act 1998 (NSW)

Records management

A field of management responsible for the efficient and systematic control of the creation, receipt, maintenance, use and disposition of records, including processes for capturing and maintaining evidence of and information about business activities and transactions in the form of records.

Records management program

A records management program encompasses the management framework, the people and the systems required within an organisation to manage full and accurate records over time. This includes the identification and protection of records with longer-term value that may be required as State archives.

Registration

When a record is added to a recordkeeping system it is given a unique identifier. The primary purpose of registration is to provide evidence that a record has been created

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or captured in a record-keeping system, with the benefit of facilitating retrieval and access.

Retention and Disposal Authority

Documents authorised by the Board of State Records NSW that set out appropriate retention periods for classes of records. There are two main types:

- o Functional retention and disposal authorities authorise the retention and disposal of records unique to a specific organisation.

- o General retention and disposal authorities authorise the retention and disposal of records common to more than one organisation.

Staff

For the purpose of this policy, staff refers to all employees, contractors and other persons who, in the course of their work, have access to information in or on behalf of The SCHN and the NSW public health system.

State archive

A record where the ownership has been transferred to the State Records Authority of New South Wales under the State Records Act, 1998 (NSW)\ and is now housed at that authority.

Thesaurus

A thesaurus is a controlled list of terms linked together by semantic, hierarchical, and associative or equivalence relationships. Such tools act as a guide to allocating classification terms to individual records.

In a thesaurus the meaning of the term is specified and hierarchical relationships to other terms shown. A thesaurus provides sufficient entry points to allow users to navigate from terms which are not to be used to the preferred terminology adopted by the organisation.

HP TRIM

The Total Records and Information Management (HP TRIM) is the electronic records management software that captures, maintains and provides access to records stored within its system. It provides evidence of past records that have been disposed either by destruction or archiving, and locations where the archived records are now stored.

Vital Record

Are records that are essential for the ongoing business of an agency, and without which the agency could not continue to function effectively. The identification and protection of such records is a primary object of records management and counter disaster planning.

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