

# CORPORATE RECORDS MANAGEMENT POLICY®

## DOCUMENT SUMMARY/KEY POINTS

Sydney Children's Hospitals Network (SCHN) information is a corporate asset. It is vital both for ongoing operations and also in providing valuable evidence of business decisions, activities and transactions.

- This policy ensures that SCHN is committed to capturing accurate and reliable records of executive activities and decisions in compliance with NSW State 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 and best practice standards on managing information as an asset.
- 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.

### **Additional information**

- Refer to the SCHN [Corporate records management](#) intranet page.

This document reflects what is currently regarded as safe practice. However, as in any clinical situation, there may be factors which cannot be covered by a single set of guidelines. This document does not replace the need for the application of clinical judgement to each individual presentation.

<b>Approved by:</b>	SCHN Policy, Procedure and Guideline Committee	
<b>Date Effective:</b>	1 <sup>st</sup> March 2020	<b>Review Period:</b> 3 years
<b>Team Leader:</b>	Records Manager	<b>Area/Dept:</b> Executive Office

## CHANGE SUMMARY

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

## READ ACKNOWLEDGEMENT

- All employees involved in creating or accessing corporate records must read and acknowledge this policy.

This document reflects what is currently regarded as safe practice. However, as in any clinical situation, there may be factors which cannot be covered by a single set of guidelines. This document does not replace the need for the application of clinical judgement to each individual presentation.

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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 Sydney Children's Hospitals Network (SCHN) 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. Good recordkeeping and compliance enables SCHN to meet its business needs, accountability and governance and protects the rights and interests of the Government, the organisation, its employees, clients and the community.

The benefit of complying with this policy will be trusted information that is well-described, stored in known locations and accessible to employees and clients when needed.

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 employees 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 and Workforce personnel records.

Complementary policies and additional guidelines and procedures support this policy and are located under SCHN ePolicy on the intranet.

## 1.2 Authority of this policy

This policy has been authorised by the Chief Executive, SCHN and is available to all employees. It has been developed in consultation with SCHN employees 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 employees, including contractors and consultants, must comply with this policy in their conduct of official business created and received for the SCHN. This policy applies to records in all formats, documents, email, voice messages, memoranda, minutes, audio-visual materials and business system data.

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

HP TRIM is an electronic document recordkeeping management system (EDRMS) 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.

## 2 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

### **Archive**

The records identified as having continuing value after their shelf life because of their legal, administrative or historical value.

### **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

### **Content Manager**

The version 9 of our EDRMS also known as TRIM.

### **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.

### **Electronic record**

Record where the information is communicated and maintained by means of electronic equipment.

### **Electronic Document Records Management System (EDRMS)**

An Electronic Document Records Management System (EDRMS) is software designed to facilitate the creation, management, use, storage and disposal of a range of both physical and digital documents and records. HP TRIM (and subsequent versions, Record Manager, Content Manager) is the official recordkeeping system at SCHN.

### **Employee**

For the purposes of this policy, 'Employee' is defined as any person working in a part-time, casual or full-time capacity within the SCHN and the NSW public health system, including the Chief Executive, Directors, Managers, Supervisors and Team Leaders, as well as volunteers, work-experience personnel, contractors, trainees and students.

### **File**

Files are a physical collection of documents on a specific subject, located within a file cover, that show organisational activities through an identifiable sequence of transactions. Documents are arranged in chronological order with the most recent document on top.

### **Metadata**

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 employees in the course of organisational operations and activities are official records and are owned by The Sydney Children's Hospitals Network.

### **Recordkeeping**

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 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:

- Functional retention and disposal authorities authorise the retention and disposal of records unique to a specific organisation.
- General retention and disposal authorities authorise the retention and disposal of records common to more than one organisation.

### **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.

### **TRIM**

The Total Records and Information Management (HP TRIM) commonly referred to as 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.

### **User**

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

### **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.

## **3 Roles and Responsibilities**

### **All employees**

All employees are responsible for the capture and management of information as defined by this policy. Additional responsibilities for certain employees are listed below:

#### **Chief Executive**

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

#### **Senior Responsible Officer**

The Senior Responsible Officer (SRO) is a senior manager reporting to the CE and is a position required by the NSW State Archives and Records to comply with the Standard on records management. The SRO oversees the Corporate Records at SCHN to ensure the organisation has the required policies, infrastructure and resources to maintain effective records and information strategies.

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

#### **Directors and Managers**

Directors and managers are responsible for the visible support of and adherence to this policy by promoting a culture of compliant information management through the creation, capture, storage and monitoring of records by employees as part of normal business practice.



- Advising the Corporate Records Manager of any changes in the business environment that would impact on information management requirements, such as new employees, new positions and changed areas of business.
- Completing appropriate records management training for supervisors and managers and ensuring their team are adequately trained and are aware of their responsibilities.  
[Recordkeeping and you: supervisors and managers](#)

### **SCHN Executive Services**

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

Registering incoming mail to the Executive into the EDRMS and distributing to action officers; and

- Registering outgoing mail from the Executive into the EDRMS.
- Capture all correspondence and other documentation created in response to incoming correspondence within their Directorate into the EDRMS.
- Update movement of documents within Executive and support Units.
- Capture/scan signed correspondence back into the system.
- 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 administers the corporate recordkeeping system.
- Develops and maintains procedures around the capture and maintenance of records in the EDRMS.
- Provides advice, support and training on record-keeping practices for the capture and maintenance of records in the EDRMS to system users.
- Monitors compliance with policies and procedures across the SCHN Executive Services and makes recommendations for improvement or modification of practices.
- Advises on access controls and security policy and guidelines associated with the management of information.
- Reports risks associated with non-compliance to the SRO.
- Designs and advises on recordkeeping systems.
- Establishes and maintains customised recordkeeping business rules regarding metadata.
- Manages the records management software (HP TRIM/Content Manager) 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.

- Recommends disposal of records to SRO 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.
- Maintains up to date and accurate information on the corporate records intranet pages

### **Employees with access to the EDRMS**

In addition to mandatory requirements outlined in this policy, employees using the EDRMS must also:

- Routinely create full and accurate records of their business activities, decisions and actions.
- Ensure that all official records are saved into the records management system.
- 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 will work with the employees responsible for corporate records and:

- Ensure the reliability, continuing operation of computerised systems that generate records and the development, implementation and monitoring of information technology disaster recovery plans for these systems.
- Provide 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 users have with the EDRMS 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

## 4 Records as a source

The SCHN recognises that information is a corporate asset and records are vital 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, activities, transactions, decisions and precedents for future decision making; and
- Protect the rights and interests of Government, SCHN, patients and community.

## 5 Records Management Program

### 5.1 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 [References](#) for a list of legislation and government directions and SCHN documents which affect recordkeeping.

## 5.2 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.

If 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 employees, 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 devices 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.

## 5.3 Elements of the Records Management Program

### 5.3.1 *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.

Employees should ensure that they create official records of all decisions and actions made in the course of their official business. Official information created should provide a reliable and accurate account of business decisions and actions. Include all necessary information to support business needs, including names, dates and time, and other key information needed to capture the business context. 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 EDRMS so they can be managed appropriately.

- **Records must be accurate**
  - All employees must ensure accurate records are made at the time of or as soon as practicable after the event or transaction to which they relate.
- **Records must be authentic**
  - All employees must ensure that records are routinely captured in the official recordkeeping systems and that appropriate metadata is created and captured or otherwise associated with records.
- **Records must have integrity**
  - All employees must safeguard records from unauthorised access, alteration, deletion or destruction.
- **Records must be useable**
  - All employees must ensure that records are linked to the business context and that the location of records is recorded and tracked to ensure they are accessible for as long as they are required.

Responsibility rests with the creator of the records to ensure that the records are captured, managed and maintained for as long as they are needed for business, legal requirements (including in accordance with current authorised records retention and disposal authorities), accountability and community expectations.

Records must be placed in an official file known as containers. Containers are created using the thesaurus of SCHN's Business Classification Scheme (BCS) and given a unique number. All official outgoing communications, including letters, faxes, emails, etc. should contain reference to the document record number, as prompted in the templates.

Where possible, all incoming paper correspondence the organisation receives should be scanned and saved into the EDRMS.

In limited situations, such as for shared service level agreements, paper files may need to be created. In these instances the Corporate Records Manager will need to be contacted.

Whenever new databases and automated systems are being designed, the Corporate Records Manager should be consulted to determine what records should be created and captured by the system and the recordkeeping rules and tools that need to be accommodated.

When units within SCHN request the introduction of TRIM into their unit as their recordkeeping system for specific programs/projects they should consult the Corporate Records Manager when designing unit specific recordkeeping guidelines. This ensures that recordkeeping standards are maintained, essential metadata is captured and it is compliant with legislative requirements.

### **5.3.2 Storage**

Current hardcopy documents should be stored in a “boxed” system after being scanned and captured into the EDRMS, 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 sentenced and 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.

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 sentenced and may be retained in accordance with the current Retention and Disposal Authority. These should be forwarded to the Corporate Records Manager. 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 (and subsequent versions, Record Manager, Content Manager) is the official recordkeeping system within Executive Services. No records should be stored permanently in email folders, on local or network drives, USB flash drives, external hard drives or any other temporary storage device as these lack the necessary functionality to protect business information over time. These devices can be used for short term storage but must be transferred to the EDRMS 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 may be disposed of under a normal administrative practice (NAP). Records of long term or archival value should be retained online wherever possible and managed in accordance with any Records Management Procedures.

### **5.3.3 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. Users should update the EDRMS of a new location when passing records on to another person/ individual.

Compliance with this policy will be monitored. Levels of compliance will be reported to the Senior Responsible Officer.

The Corporate Records Manager is responsible for ensuring that records and environmental conditions are monitored regularly to protect both electronic and physical 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.



### **5.3.4 Access**

Records must be protected from unauthorised or unlawful access, destruction, loss, deletion or alteration. As a valuable information resource records must be available to all authorised employees that require access to them for business purposes.

- Restrictions and caveats can be applied to electronic records of a highly sensitive nature.
- Sensitive hard copy files should be stored in a locked cupboard.
- Employees are required to ensure that all sensitive or confidential information in hardcopy or electronic form is secure in their work area at the end of the day and when they are expected to be gone for an extended period.
- Computer workstations must be locked when workspace is unoccupied.

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.

### **5.3.5 Disposal**

Disposal authorities are applied to records within a government agency to determine how long that record is to be retained. The SCHN uses a number of authorised General Retention and Disposal Authority and Functional Retention and Disposal Authorities relating to public health services which cover 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 business unit within SCHN that is considering disposing of any records must contact the Corporate Records Manager to ensure that compliance is being adhered to.

### **5.3.6 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.

## 6 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 employees are aware of their responsibilities relating to creating, capturing 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 employees.
- All employees using TRIM for recordkeeping, including new employees, are trained on how to use the recordkeeping system used at SCHN.

## 7 References

### 7.1 Legislation, standards and related documents

1. [State Records Act 1998](#) and regulations
2. [National Safety and Quality Health Service Standards](#)
3. Australian Standard on records management - AS ISO 15489.1: 2017
4. [Government Information \(Public Access\) Act 2009](#)
5. [Privacy and Personal Information Protection Act 1998](#)
6. [The Health Records and Information Privacy Act 2002](#)
7. [Evidence Act 1995](#)
8. [Public Finance and Audit Act, 1983](#)
9. [Copyright Act 1968](#) (Commonwealth)
10. [The Code of Ethics and Conduct for NSW government sector employees](#)
11. Information and Privacy Commission – various resources for public sector agencies
12. NSW Treasurer's Directions
13. Good conduct and administrative practice: Guidelines for state and local government. 3rd ed. 2017
14. [Premier's Memoranda and Circulars](#), including [C2003-17](#), [M2007-08](#)
15. [State Records - Government Recordkeeping](#)
16. [NSW Department of Health – Records management policy](#) PD2009\_057

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.



## 7.2 General retention and disposal authorities

17. [GA 28 - General retention and disposal authority: administrative records](#)
18. [GDA 21 - General retention and disposal authority - Health Services, Public: Administrative Records](#)
19. [GDA17 - General retention and disposal authority - Health Services, Public: Patient/Client records](#)
20. [GA44 - General retention and disposal authority - Health Services: Statewide health services, quality assurance, reporting, education and training](#)
21. [GA45 - General retention and disposal authority - Original or source records that have been copied](#)
22. [GA48 - General retention and disposal authority – Source records that have been migrated](#)

## 7.3 SCHN Resources

23. [SCHN Corporate Records Intranet](#)
24. [SCHN Business Classification Scheme \(BCS\)](#)
25. [SCHN ePolicies](#)
  - a. Code of Conduct
  - b. Workplace Health & Safety

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