



Corporate Recordkeeping Compliance Policy

1. Purpose

The purpose of this policy is to support the WA Country Health Service (WACHS) and all its employees to:

- comply with the statutory requirements of the *State Records Act 2000* to keep records in accordance with the WACHS [Recordkeeping Plan](#)
- comply with the statutory requirements of the *Public Sector Management Act 1994* to maintain proper standards in the creation, management, maintenance and retention of records
- comply with the requirements of Principle 8 of the [Code of Conduct Policy](#) to maintain records in accordance with expected standards
- mitigate risks of information compromise as defined in the [Western Australian Information Classification Policy](#) by protecting recorded information in compliance with the requirements of the [WA Government Cyber Security Policy](#).

Out of scope

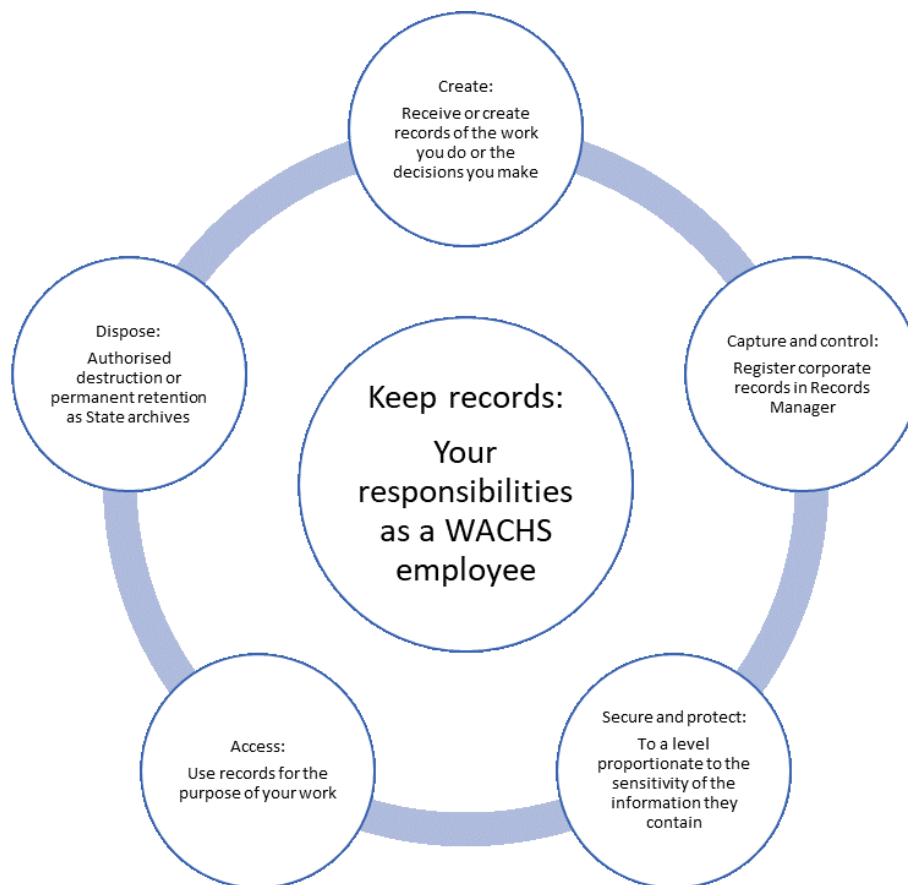
Health records are out of scope of this policy. Systems and methods used for the creation and storage of health records and patient information are detailed in the WACHS [Health Record Management Policy](#) and the WACHS [Documentation - Clinical Practice Standard](#).

2. Policy

All WACHS employees are to keep records in accordance with the WACHS [Recordkeeping Plan](#). For the purpose of this policy “WACHS employees” includes trainees, students, volunteers, researchers, contractors for service (including all visiting health professionals and agency staff) and persons delivering training or education within WACHS.

All WACHS employees with corporate duties are to keep records in Records Manager. For the purpose of this policy “corporate duties” include non-clinical, administrative, management or operational duties not incidental to the role and not concerning only the individual. For example, a clinical employee submitting an expense claim on their own behalf may not be a corporate duty but approving another employee’s claims would be.

All WACHS employees including those without corporate duties are to ensure they engage in verifiable business processes that result in the keeping of corporate records whereby a proxy may capture those records.



2.1 Create records

All WACHS employees must create records as evidence of their work and decisions.

2.2 Capture and control records

All WACHS employees with corporate duties must capture records in Records Manager, or in an approved business system with recordkeeping functionality and controls to support the provision and restriction of access to authorised users.

The following are not approved recordkeeping systems and must not be used to store and manage corporate records, with the exception of ephemeral records:

- shared drives
- email management systems
- collaboration applications (such as SharePoint, Microsoft Teams and OneDrive).

2.3 Secure and protect records

All WACHS employees must secure and protect records to a level proportionate to the sensitivity of the information they contain.

In compliance with the requirements of the [Western Australian Information Classification Policy](#), records that contain sensitive or restricted information must be secured and protected. Records that do not contain sensitive or restricted information should be accessible to WACHS employees to access and use, by default.

2.4 Access records

All WACHS employees must only access records required for the purpose of performing their duties.

The ability to access records does not confer a right to access records for any reason other than for the purpose of performing an employee's duties.

2.5 Dispose of records

All WACHS employees must dispose of records in accordance with a current disposal authority approved by the State Records Commission and only with authorisation from a Tier 3 officer, in accordance with the WACHS [Authorisation Schedule](#). Records must not be destroyed or transferred to the State Archives otherwise.

Records of disposal including authorisation must be kept.

These requirements are supported by the [Corporate Records Management Procedure](#).

3. Roles and Responsibilities

3.1 Chief Executive

The Chief Executive is responsible for ensuring that the organisation keeps proper records per the section 29(n) of the *Public Sector Management Act 1994*.

The Chief Executive, through the WACHS Executive, is responsible for ensuring that the organisation complies with the *State Records Act 2000* and, subsequently, with the WACHS [Recordkeeping Plan](#).

The Chief Executive is responsible for receiving and certifying evidence and reports to the State Records Commission on commitments to identified areas of improvement outlined within the WACHS [Recordkeeping Plan](#) or delegating this responsibility.

3.2 WACHS Executive

The WACHS Executive has delegated responsibility for ensuring that WACHS' employees maintain full and proper records of their business activities.

3.3 Manager Records Management

The Manager Records Management is responsible for:

- ongoing review of the currency of the WACHS [Recordkeeping Plan](#) and submitting an amended plan to the State Records Office when any significant change to WACHS functions, recordkeeping practices, storage arrangements or disposal authorities is identified
- conducting a full review of the WACHS [Recordkeeping Plan](#) and submitting an amended plan to the State Records Office at least every five years
- monitoring and implementing commitments to identified areas of improvement outlined within the WACHS [Recordkeeping Plan](#)

- providing evidence and reports on commitments to identified areas of improvement outlined within the WACHS [Recordkeeping Plan](#) to the Chief Executive, or delegate, for certification
- reporting in the WACHS Annual Report against Principle 6 of State Records Commission Standard 2 Record Keeping Plans.

3.4 All WACHS employees

All WACHS employees are responsible for keeping records, or ensuring they engage in verifiable business processes that result in keeping records, in compliance with the WACHS [Recordkeeping Plan](#), this policy and the [Corporate Records Management Procedure](#).

All staff are required to work within policies and guidelines to make sure that WACHS is a safe, equitable and positive place to be.

4. Monitoring and Evaluation

4.1 Monitoring

Monitoring of ongoing compliance with the requirements of this policy is carried out by the reporting and auditing methods and according to the schedule detailed in the [Corporate Records Management Procedure](#).

The Manager Records Management is responsible for this monitoring and for reporting the results to the WACHS Executive.

4.2 Evaluation

Evaluation of this policy is conducted against the [State Records Office Recordkeeping Plan Self-Evaluation Checklist](#) at least every five years or whenever a significant change is identified.

The Manager Records Management is responsible for this evaluation.

5. Compliance

This policy is a mandatory requirement under the State Records Act 2000.

Failure to comply with this policy may constitute a breach of the WA Health Code of Conduct (Code). The Code is part of the [Integrity Policy Framework](#) issued pursuant to Section 26 of the [Health Services Act 2016](#) and is binding on all WACHS staff which for this purpose includes trainees, students, volunteers, researchers, contractors for service (including all visiting health professionals and agency staff) and persons delivering training or education within WACHS.

WACHS staff are reminded that compliance with all policies and procedures is mandatory.

6. References

[Child and Adolescent Health Service \(CAHS\) Corporate Records Management Policy](#)
[Health Support Services \(HSS\) Information and Records Management Policy](#)

7. Definitions

Term	Definition
Corporate duties	<p>Non-clinical, administrative, management or operational duties not incidental to the role and not concerning only the individual.</p> <p>For example, a clinical employee submitting an expense claim on their own behalf may not be a corporate duty but approving another employee's claims would be.</p>
Corporate record	<p>Information received or created relating to any or all aspects of decision making and all business transactions but not including patient or client information captured in the health record.</p>
Disposal authority	<p>The legal instrument under which State records can be disposed.</p> <p>Source: State Records Office of Western Australia (SRO) Guideline - Records Retention and Disposal Instructions</p> <p>The document authorising disposal of records. This may take the form of a Retention and Disposal Authority or Schedule, an Ad Hoc Disposal Authority or a Disposal List, which has been approved. The State Records Commission is the authorizing body for disposal authorities.</p> <p>Source: State Records Commission (SRC) Standard 2 - Recordkeeping Plans</p>
Dispose / Disposal	<p>The final decision which determines whether records will be archived or destroyed.</p> <p>Disposal can also mean the <i>process</i> of implementing an approved disposal authority.</p> <p>Source: SRO Guideline - Records Retention and Disposal Instructions</p> <p>The removal of records from the organization once they have reached the inactive phase, and their subsequent destruction, or permanent retention as State archives.</p> <p>Source: State Records Commission Standard 2 - Recordkeeping Plans</p>
Ephemeral record	<p>Having no continuing value to the agency, generally only needed for a few hours or a few days and may not need to be placed within the official recordkeeping system.</p> <p>Source: General Disposal Authority for State Government Information (DA 2013-017/1)</p>
Health record	<p>The compilation of information for a patient's health history, past and present, organised in such a manner that critical information concerning a patient is immediately accessible.</p> <p>Source: WACHS Health Record Management Policy</p>

Information compromise	Information compromise includes, but is not limited to: loss, misuse, interference or unauthorised access, modification or disclosure. Source: Western Australian Information Classification Policy - Business Impact Levels Tool
Keep records / Keeping records	Creating, maintaining, indexing, organizing, storing, preserving, securing, retaining and managing records. Maintaining, preserving, securing and retaining the means by which any information on a record can be recovered. Source: State Records Act 2000 section 3(2)
Proxy	Another employee or an automatic process to capture records on behalf of an employee.
Record	Records are 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. Source: AS ISO 15489 Information and documentation – Records management – Concepts and principles “Record means any record of information however recorded”. Source: State Records Act 2000 section 3(1)
Recordkeeping system	Information system which captures, manages and provides access to records over time.
Records Manager (TRIM)	WACHS’ approved corporate recordkeeping system. Also known as TRIM. An electronic document and records management system (EDRMS).
WACHS Recordkeeping Plan	A plan approved by the State Records Commission in respect of WACHS under Part 3 of the <i>State Records Act 2000</i> . The recordkeeping plan sets out the matters about which records are created by WACHS and how WACHS is to keep its government records. All government organisations must have an approved recordkeeping plan. A WACHS employee who does not keep a government record in accordance with the WACHS Recordkeeping Plan commits an offence, penalty \$10,000 as per section 78(1) of the State Records Act 2000 .

8. Document Summary

Coverage	WACHS-wide
Audience	All WACHS employees
Records Management	Non Clinical: Corporate Recordkeeping Compliance Policy
Related Legislation	Health Services Act 2016 (WA) Public Sector Management Act 1994 (WA) State Records Act 2000 (WA)
Related Mandatory Policies / Frameworks	Information Management Policy Framework MP 0124/19 Code of Conduct Policy
Related WACHS Policy Documents	Corporate Records Management Procedure Health Record Management Policy Documentation - Clinical Practice Standard
Other Related Documents	State Records Commission Standards State Records Office - Recordkeeping Plan Self-Evaluation Checklist WACHS Authorisation Schedule WACHS Recordkeeping Plan WA Government Cyber Security Policy Western Australian Information Classification Policy
Related Forms	Nil
Related Training Packages	Recordkeeping Awareness Training (RAT) WACHS Records Manager training
Aboriginal Health Impact Statement Declaration (ISD)	ISD Record ID: 2261
National Safety and Quality Health Service (NSQHS) Standards	1.07
Aged Care Quality Standards	8
National Standards for Mental Health Services	8.4

9. Document Control

Version	Published date	Current from	Summary of changes
1.00	1 June 2023	1 June 2023	<ul style="list-style-type: none"> • Title changed from Records Management Policy. • Updated to: <ul style="list-style-type: none"> ○ include references to WA government cybersecurity and information classification policies ○ reflect the current electronic recordkeeping environment. • Restructured to be consistent with State Records Commission (SRC) advice. • Expanded responsibilities of Manager Records Management. • Removed details of processes to new Corporate Records Management Procedure.

10. Approval

Policy Owner	Executive Director Business Services
Co-approver	N/A
Contact	Manager Records Management
Business Unit	Records & TRIM Services
EDRMS #	ED-CO-14-23475
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