



Records Management Policy

1. Background

This policy has been developed in consideration of the WA Health system [Information Management Policy Framework](#) and the [WA Country Health Service \(WACHS\) Recordkeeping Plan](#) (the Plan). The Plan was approved by the State Records Commission in August 2013 and is reviewed on a 5 yearly cycle. The purpose of the Plan is to set out the manner in which records are to be created and kept by the agency.

In accordance with Section 17 of the [State Records Act 2000](#) (WA) (the Act), WACHS and its employees are legally required to comply with the contents of the Plan. The Act further requires WACHS to identify, capture, manage, control preserve and dispose of government records in accordance with the Plan.

Compliance with the Plan enables WACHS to:

- meet legislative requirements
- meet accountability requirements by recordkeeping decisions and actions
- protect the interests of consumers, employees, WA health system and the broader Government
- Meet community expectations to keep historically significant records.

2. Policy Statement

WACHS undertakes records management in accordance with legislative and business regulations.

All policy and procedural statements contained within this document meet section 80(a) of the [Public Sector Management Act 1994](#) (WA) and are applicable to all staff.

3. Definitions

Archival record	A record (also known as a State Archive) that is to be preserved permanently (never to be destroyed) because of its enduring value (for example historical or evidential).
Business Information System	An organised collection of hardware, software, supplies, policies, procedures and people, which stores, processes and provides access to an organisation’s business information. Alternatively, it is an automated system that creates or manages data about an organisation’s activities. Includes applications where its primary purpose is to facilitate transactions between an organisational unit and its customers, for example, an e-commerce system, client relationship management system, purpose built or customised database, finance or human resources systems.

Confidentiality	Obligation imposed on persons by common law, statute and /or equity which requires that information of a certain character (e.g. personal or otherwise sensitive information) be treated in confidence by those to whom it is made known or becomes known.
Disposal	The removal of records from the organisation and their subsequent destruction or transfer to the State Records Office for permanent retention as State Archives.
Disposal authority	Establishes the minimum retention period for each type of record listed in the schedule regardless of medium, and dictates the final action for the record.
Email	An item of electronic mail sent or received through an electronic mail application (e.g. Microsoft Outlook).
Record	Recorded information (regardless of form or medium) created, received and maintained by the organisation in pursuance of its legal obligations or in the transaction of business.
Record – Corporate	Information received or created relating to all aspects of evidence based decisions and business transactions not provided for within the Patient Information Retention and Disposal Schedule .
Record – Patient Information	Information received or created in the management of patients within health service facilities provided for within the Patient Information Retention and Disposal Schedule .
Recordkeeping	The systematic organisation and control of recorded information in any format from the time it is created to its final disposition.
Records Management	A systematic approach to the creation, maintenance, use and disposition of records.

4. Roles and Responsibilities

Chief Executive, through the WACHS Executive, is to ensure that an organisational system for the capture and management of records is maintained and compliant with legislative requirements and best practice standards.

WACHS Executive has a duty to ensure that WACHS maintains proper and accurate records.

Line Managers are to ensure that:

- staff are aware of their recordkeeping and confidentiality obligations
- staff are aware of correct recordkeeping practices
- staff have access to resources that support correct recordkeeping practices, including access to the official Electronic Documents and Record Management System (EDRMS)

- staff are enabled and supported to complete the online Recordkeeping Awareness Training (RAT EL2) and Confidentiality (IMCON EL2) courses (available via the [Learning Management System or LMS](#)) and, where appropriate, EDRMS training
- appropriate clauses relating to the recordkeeping requirements are included in any outsourcing contracts
- all persons engaged under a contract for services or otherwise are informed of their recordkeeping obligations
- staff are instructed to comply with the latest up-to-date records management procedures relevant to their site, including the use of EDRMS where required
- adequate support is provided to facilitate proper records management practices
- ensure appropriate security is applied to confidential and sensitive records by staff
- disposal of records is authorised in a timely manner and in accordance with an approved Records Disposal Authority (RDA) or General Disposal Authority (GDA) as advised by the Records and TRIM Services (RTS) team.

Business Information System Owners / Data Custodians are to:

- establish recordkeeping compliance processes for new business systems or when current systems are upgraded
- implement appropriate security and authentication controls
- retain ownership of records, including the responsibility for conversion of migration of information for its entire lifespan
- oversee the storage of digital records and metadata in appropriate media so that they remain accessible and usable for as long as they are required (includes legacy systems).

Records and TRIM Services (RTS) Team are responsible for the custody of WACHS corporate memory including:

- development and maintenance of policies, procedures, manuals and training programs that support recordkeeping practices
- development and review of [WACHS Recordkeeping Plan](#)
- development, management and maintenance of the approved EDRMS
- provision of EDRMS training and end-user support
- identifying, collecting, managing, preserving and providing access to WACHS corporate records
- promote the use of EDRMS and electronic recordkeeping practices
- reporting on recordkeeping compliance, current state or recordkeeping and adoption of EDRMS to the WACHS Executive.

Staff with access to EDRMS are to:

- complete the WACHS Recordkeeping Awareness Training (RAT EL2) and Confidentiality (IMCON EL2) eLearning packages
- maintain records in accordance with current guidelines
- complete an online or in-class EDRMS training program as indicated by RTS
- capture all corporate records within the approved EDRMS, except for ephemeral records, where available and required

- prioritise the transition of business records as soon as practicable from shared and personal drives into EDRMS, capture patient information in the official Patient Administration System (PAS) and/or approved clinical application/s
- ensure appropriate security is applied to confidential and sensitive records
- in the absence of EDRMS, PAS and or approved clinical application/s, maintain paper-based records including printed emails in accordance with minimum standards
- documents recording account and password credentials within should be protected and not saved in unrestricted systems
- not dispose of records unless authorised by an approved RDA or GDA.

5. Email Management

Emails are a significant part of WACHS corporate memory and as such must be treated as any other business information and managed at minimum in line with the following requirements:

Accessibility

Emails must be:

- restored from archiving solutions, or
- retrieved from shared and personal drives, and
- stored in a secure manner in accordance with outlined Storage requirements.

Storage

Emails must be stored:

- in context (alongside other related information and not in generic locations), and
- in the approved EDRMS, or
- in the paper-based health record if pertaining to patient care management, or
- printed and stored in paper-based files where EDRMS is not available.

Naming Conventions

Titles of emails stored electronically should be concise and meaningful; and should where possible contain:

Date (preferably in reverse order to support sorting mechanisms) – Key name(s) – Subject/Topic

e.g. YYYYMMDD – John Smith – Response to excess leave management plan

6. Compliance

This policy is a mandatory requirement under the [Public Sector Management Act 1994 \(WA\)](#) and [State Records Act 2000 \(WA\)](#).

Failure to comply with this policy document may constitute a breach of the WA Health system [MP0124/19 Code of Conduct \(Code\)](#). The Code is part of the [Integrity Policy Framework](#) issued pursuant to section 26 of the [Health Services Act 2016 \(WA\)](#) 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 is mandatory in line with [MP0007/16 WA Health Compliance Management Policy](#).

7. Evaluation

Evaluation of this policy is to be carried out annually by the Manager Records Management. The following means or tools are to be used:

- reports to WACHS Executive
- reports to directorate/business areas
- audits of electronic records
- audits of paper-based records
- interviews.

8. Standards

[National Safety and Quality Health Service Standards](#) – 1.16

[State Records Commission Standards](#) - 1-4, 6-8

Australian Standards - 15489.1-2017 - Records Management (Access on demand via WACHS Library subscription)

9. Legislation

[State Records Act 2000](#) (WA)

[Health Services Act 2016](#) (WA)

[Public Sector Management Act 1994](#) (WA)

10. References

[WACHS Recordkeeping Plan](#)

11. Related WA Health System Policies

[MP0124/19 Code of Conduct \(Code\)](#)

12. Policy Framework

[Employment](#)

[Information Management](#)

**This document can be made available in alternative formats
on request for a person with a disability**

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