

Policy

Records Management Policy

POLY-79

1. Purpose

Records and information help organisations plan for and achieve short and long-term outcomes that are relevant and valuable to the business, government and the community they serve. Records:

- provide the foundation for sustainable and effective delivery of services
- preserve public knowledge for reference and reuse
- support decision-making
- document rights and entitlements
- drive collaboration and communications
- provide transparency and accountability of government operations
- make up the corporate memory of an organisation.

The purpose of this policy is to ensure that full and accurate records of all business activity and decisions of NSW Health Pathology (NSWHP) are captured, managed, maintained and disposed of appropriately and in accordance with relevant legislation. This will enable NSWHP to achieve information accessibility and business efficiency in relation to records with ongoing value to NSWHP. It will also promote transparency and accountability which is in the interests of NSWHP, its staff, patients, clients and the community.

NSWHP is committed to meeting its responsibilities under the *State Records Act 1998* (the Act), and to implementing best practice in its records and information management practices, recordkeeping and other business systems and procedures. This policy will enhance the records management function within NSWHP and serves to directly highlight the key responsibilities and accountabilities of staff in relation to complying with their obligations under the Act.

2. Background

This policy forms part of NSWHP's Records Management Program, which NSWHP is required to establish and maintain under s.12(2) of the Act.

3. Scope

This policy applies to all NSWHP staff who are employed or engaged whether on a temporary or permanent basis and includes contractors, consultants and volunteers (referred to as 'staff' in this policy – see Definitions). All staff must comply with this policy, and any associated procedures, in the course of exercising official functions for NSWHP. This policy applies to records in all formats; both hard copy and electronic.

Compliance with this policy facilitates and supports staff to meet their legal obligations relating to recordkeeping.

4. Definitions

Archive	Those records of organisations and individuals that have been selected for indefinite retention on the basis of
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	their continuing value for legal, administrative, financial or historical research purposes.
Business activity	An umbrella term covering all the functions, processes, activities and transactions of an organisation and its employees. Includes public administration as well as commercial business.
Business systems	Organised collection of hardware, software, supplies, policies, procedures and people, which stores, processes and provides access to an organisation's business information.
Capture	A deliberate action which results in the registration of a record into a recordkeeping system.
Continuing value	Records that have administrative, business, fiscal, legal, evidential or historic value to the public office.
Destruction	Process of eliminating or deleting records beyond any possible reconstruction. The process includes destroying all copies of the record. The destruction of state records needs to be documented.
Dispose/Disposal	Range of processes associated with implementing records retention, destruction or transfer decisions which are documented in disposition authorities or other instruments. Also known as disposition.
Full and accurate records	Full and accurate records are sources of detailed information and evidence that can be relied on and used to support current activities. Records regardless of form or structure, should possess the characteristics of authenticity, reliability, integrity and useability to be considered authoritative evidence of business events or transactions and to fully meet the requirements of the business.
Information governance	An approach to managing information assets across an entire organisation to support its business outcomes. It

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	involves having frameworks, policies, processes, standards, roles and controls in place to meet regulatory, legal, risk and operational requirements. Information governance is an essential element of corporate governance that must be aligned with business outcomes.
Information risk	Any risk which relates to the quality characteristics and value of records and information in any form that is created, maintained, transmitted, manipulated, stored or owned by an organisation.
Information security	Preservation of confidentiality, integrity and availability of information.
Preservation	Process and operations involved in ensuring the technical and intellectual survival of authentic records over time.
Public office	A department, office, commission, board, corporation, agency, service or instrumentality exercising any function of any branch of the Government of the State.
Recordkeeping	Making and maintaining complete, accurate and reliable evidence of business transactions in the form of recorded information.
Recordkeeping system	Business information system which captures, manages and provides access to records over time.
Records	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.
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.

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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 and general. • Functional retention and disposal authorities relate to records that are unique to a specific organisation • General retention and disposal authorities relate to records that are common to more than one organisation such as general administrative records.
Retention period	The period or duration of time which the information should be retained before disposal.
Senior Responsible Officer	The Senior Responsible Officer (SRO) has strategic and managerial oversight of records management practices within each public office. Each public office should advise NSW State Archives and Records of their organisation's SRO and keep them updated with any changes to personnel undertaking this role.
Staff	All persons employed or engaged by NSWHP and includes contractors, consultants and volunteers.
State Archive	A State record that the State Archives and Records Authority of NSW has control of under the <i>State Records Act 1998</i>
State Record	A state record is any record made or received by any person in the course of the exercise of official functions in a public office, or for any purpose of a public office, or for the use of a public office.

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5. Policy Statement

5.1. What are records?

Business records exist for a variety of administrative, functional, legislative, historical and legal reasons.

Records are defined by the National Archives of Australia (NAA) as:

“all information created, sent and received in the course of carrying out of the business of the agency”.

State Archives and Records Authority of NSW (the Authority) defines State Records as:

“any record made or received by any person in the course of the exercise of official functions in a public office”.

For the purposes of this policy, ‘records’ are defined as information created, received and maintained as evidence and information by an organisation or person, in pursuance of legal obligations or in the transaction of official business.

5.2. Value of records as a corporate asset

NSWHP recognises that its records are a corporate asset, forming a key part of its corporate memory. Records support accountability by providing evidence of actions taken and decisions made and are a vital asset to any organisation. They support informed decision-making, policy formulation, improved customer service and the management of risk and serve to protect NSWHP’s interests and those of the community we serve.

NSWHP will ensure the preservation of its records through appropriate recordkeeping practices, processes and the implementation of appropriate systems.

5.3. The benefits of good recordkeeping

Good recordkeeping practices provide the following substantial benefits:

- supports organisational performance of business activities and facilitates better decision making.
- enables NSWHP to comply with its legislative and regulatory requirements as a public office under the Act.
- protects the interests of NSWHP.
- supports consistency, continuity, efficiency and productivity in service delivery
- promotes a transparent and accountable environment where the agency is able to access appropriate relevant records and information at the time it is required.

5.4. Routine records creation and capture

NSWHP staff are required to create and capture records that adequately document the business activities that they are involved in as part of their role. Records can be captured in a wide variety of formats including emails, electronic records, written correspondence, photographs, etc. Staff should:

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- ensure records of significant business conducted or decisions made (including verbally) are routinely created and captured. Significant business can include: the provision of advice, instructions or recommendations, giving permissions and consent, and making decisions, commitments and agreements.
- ensure a record of meetings is routinely created, either as official meeting minutes or a simple summary of decisions made.
- routinely manage high volumes of records such as in email mailboxes so that they do not accumulate by capturing emails that are records into approved recordkeeping systems. Records should show:
 - what happened, when it happened and who was involved
 - what was decided or recommended and by whom
 - what advice or instruction was given
 - the order of events or decisions
- ask themselves the following questions when determining what records to capture:
 - was this record written, sent, used or kept in the course of their role with NSWHP?
 - is anyone required to act on this record?
 - is it likely that this record will need to be accessed or used in the future?

NSWHP has implemented the Records365 platform as our official record keeping solution. NSWHP staff are required to create and capture their business records primarily into NSWHP's M365 ecosystem (Outlook, Teams, SharePoint and OneDrive) and some network share drives. The Records365 platform connects to user's files within these locations and ingests this content automatically into Records365 to ensure their management and preservation.

The capture of business records into an approved recordkeeping system like Records365 is considered records management best practice. The failure to properly capture records in this manner may lead to records being captured in uncontrolled environments which can lead to them being unusable, inaccessible or unsecured. In addition, the authenticity or integrity of the records may be threatened, which means they might not be able to be relied on as evidentiary proof of business transactions.

5.5. Routine records creation and capture

NSWHP records are securely retained for their respective retention periods that are outlined in the applicable Retention and Disposal Authorities (see page 9) and in accordance with NSWHP's Information Security Policy POLY-42. NSWHP records are securely retained and disposed of appropriately so that records are:

- accessible to all who may require access to them for business purposes (subject to any access control and security restrictions that may reasonably apply).
- controlled and managed over time
- disposed of in accordance with an approved retention and disposal authority.

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5.6. Creating meaningful record titles

A record title that provides a concise statement of the content of the record will ensure that the record can be searched and retrieved efficiently and that its content and context can be understood. An effective title is one that makes the record distinguishable from all other records held. When creating and capturing records all staff are required to adhere and comply with all corporate standards and business rules for the capture of records including records naming and titling conventions.

5.7. Records Management Program

This policy forms part of a wider Records Management Program for NSWHP. The program is consistent with State Records NSW's Standard on Records Management and codes of best practice. This policy provides the foundation for the program. The objectives of the program are to:

- ensure full, accurate and reliable records of all NSWHP operations are made and kept in order to support daily business activities and strategic decision-making. customer service needs and meet accountability requirements and community expectations.
- maintain information and records that are useable and accessible, today and in the future.
- have records management systems and practices that align and comply with all relevant requirements, standards and codes of best practice.
- control records systematically from creation and capture through to disposal as part of a records lifecycle.
- provide accountability and transparency through capture of trustworthy evidence of decisions and transactions to meet legal, administrative and community expectations.
- form a strategic plan for NSWHP's records and information assets.

6. Roles and Responsibilities

This section defines the accountabilities and responsibilities of all NSWHP staff in relation to records management.

6.1. Chief Executive

The Chief Executive has the responsibility to:

- ensure NSWHP's compliance with the Act including supporting and resourcing NSWHP's Records Management Program.
- promote compliance with this policy and support and foster a culture of good recordkeeping within NSWHP.
- Appoint the Senior Responsible Officer (SRO) for recordkeeping within NSWHP.

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6.2. Director – Legal and Corporate Governance / Senior Responsible Officer (SRO)

The Director Legal and Corporate Governance has been appointed as NSWHP's Senior Responsible Officer (SRO) for recordkeeping by NSWHP's Chief Executive. The SRO has strategic and managerial oversight of records management practices within NSWHP. The SRO has the responsibility to:

- facilitate and maintain the efficient operation of a Records Management Program for NSWHP to ensure it meets business and compliance needs, including by ensuring that policy and procedures are in place and being monitored so that they are effective in supporting business needs and compliance obligations.
- authorise and promote the adoption of records management practices and procedures across the organisation.
- promote compliance with this policy and support and foster a culture of good recordkeeping within NSWHP.
- ensure adequate staffing and resourcing for the maintenance of the agency's Records Management Program.
- authorise the use of appropriate records storage facilities for NSWHP's physical records.
- represent records and information management interests to the Strategic Leadership Team.

6.3. Strategic Leadership Team

The Strategic Leadership Team has the responsibility to:

- approve key Records and Information Management-related documentation such as this policy.
- promote compliance with this policy and support and foster a culture of good recordkeeping within NSWHP.
- provide high-level managerial oversight of NSWHP's Records Management Program
- receive routine reporting on the conduct of the agency's Records Management Program.

6.4. Privacy, Right to Information and Records Officer

The Privacy, Right to Information and Records Officer (PRIRO) has the responsibility to:

- develop and maintain NSWHP's Records Management Program.
- provide leadership, direction, guidance, advice and assistance to NSWHP staff in relation to corporate records management practices and principles.
- monitor and audit NSWHP's business practices and processes for compliance with State Records NSW's Standards.

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- support and liaise with the Senior Responsible Officer to develop sound records management practices and processes in order to deliver higher levels of records management maturity across NSWHP and to drive organisational adherence to those practices.
- regular reporting of the Records Management Program to the Strategic Leadership Team.

6.5. Chief Information Officer

The Chief Information Officer (CIO) has the responsibility to:

- ensure the access to, the reliability of and continuing operation of computerised business information systems including relevant licensing for Microsoft 365 applications.
- work with eHealth to develop, implement and maintain appropriate business continuity and disaster recovery plans for these systems.

6.6. Managers

Managers have the responsibility to:

- ensure that staff in their respective teams understand their recordkeeping obligations in accordance with this policy and have undertaken relevant MHL training modules.
- ensure records management in their team is integrated routinely into daily business processes which results in records routinely being captured into NSWHP's official recordkeeping platform or compliant records storage area (for physical records).
- consult with the PRIRO and SRO on any issues relating to records management in their team to ensure that risks to records are mitigated and that they are stored, maintained and preserved for their respective retention periods as outlined in relevant retention and disposal authorities.
- ensure that business records in their respective teams are securely and compliantly disposed of only after record retention periods have been met, properly authorised and with appropriate documentation of the records disposal process maintained in order to support defensible records disposal.

6.7. All Staff

All staff have the responsibility to:

- comply with their recordkeeping obligations under this policy and any NSWHP records management practices and processes.
- make and keep full and accurate records of their work that supports the conduct of their business activities.
- routinely capture business records of ongoing value into locations which results in those records routinely being captured into NSWHP's official recordkeeping platform or compliant records storage area (for

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physical records). Users are required to predominantly capture digital business records into Microsoft 365 applications only (Microsoft Teams, SharePoint, OneDrive and Outlook) at the time of, or as soon as practicable after, the event or transaction to which they relate.

- wherever possible and appropriate, users are not to capture records into network share drives. Unless there are compelling reasons not to, the default position should always be that digital records must be captured into Microsoft Teams/SharePoint. Users are required to create and maintain Teams and SharePoint sites to hold these records as appropriate.
- avoid capturing business records in any uncontrolled environments that are not connected content sources of NSWHP's official recordkeeping platform such as external or removable media (thumb drives), personal cloud storage, personal or academic email accounts, etc.
- not relinquish control over, damage, alter or intentionally lose records of NSWHP.
- maintain confidentiality of records that they have access to and protect sensitive records from unauthorised access, in accordance with our privacy obligations under privacy legislation and the NSW Health Code of Conduct.
- only dispose of business records with proper authorisation and in accordance with approved records destruction guidance and disposal authorities.

7. Legal and Policy Framework

This section describes the legal and policy context within which the policy operates and with which the policy must conform

Related Legislation

[State Records Act 1998](#)

[State Records Regulation 2024](#)

[Government Information \(Public Access\) Act 2009](#)

[Privacy and Personal Information Protection Act 1998](#)

[Health Records and Information Privacy Act 2002](#)

Standards and Codes of Practice

[International Standard ISO 15489:2016 Records Management](#)

[State Archives and Records NSW – Standard on Records Management](#)

[State Archives and Records NSW – Standard on Physical Storage of State Records](#)

[National Pathology Accreditation Advisory Council's Requirements for the Retention of Laboratory records and diagnostic material –Ninth Edition - 2022](#)

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The current version is only available online in the [NSW Health Pathology Policy Library](#)

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International Standard ISO/IEC17025:2018 General requirements for the competence of testing and calibration laboratories

State Archives and Records NSW – Retention and Disposal Authorities

General Retention and Disposal Authority: Health Services, Public – Patient/Client records (GDA17)

General Retention and Disposal Authority: Health Services, Public – Administrative records (GDA21)

General Retention and Disposal Authority: Administrative records (GA28)

General Retention and Disposal Authority: Original our source records that have been copied (GA51)

General Retention and Disposal Authority: Transferring records out of NSW for storage with and maintenance by service providers based outside of the State (GA50)

Functional Retention and Disposal Authority: FA427 Forensic Medicine

Related Policy Documents

NSW Health -Code of Conduct Policy Directive PD2015 049

NSWHP Information Security Policy – POLY-42

8. Review

This policy will be reviewed every 3 years: Due for review by 4 September 2029.

9. Risk

Risk Statement	If we did not have a Records Management Policy, the organisation faces severe legal, operational, and accountability risks, including a direct breach of the <i>State Records Act 1998</i> . The absence of this policy can lead to the loss, unauthorised alteration, access, or destruction of critical corporate, clinical, operational, and administrative records. Consequently, this triggers regulatory non-compliance, reduced transparency, business disruptions, financial losses, and severe reputational harm to NSW Health Pathology.
Risk Category Choose at least one category	Assets & Infrastructure ☐ ; Clinical Care & Patient Safety ☐ ; Compliance ☒ ; Cyber Security ☐ ; Governance ☐ ; Information, Technology & Data ☒ ; Leadership & Management ☐ ; People & Culture ☐ ; Resilience ☐ ; Technological ☐

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10. Further Information

For further information, please contact:

Policy Sponsor	Position: Acting Director Legal and Corporate Governance
	Name: Sarah Balk
	Email: Sarah.Balk@health.nsw.gov.au
Policy Contact Officer	Position: Privacy, Right to Information and Records Officer
	Name: Matthew Ryan
	Telephone: 02 4920 4070
	Email: Matthew.Ryan2@health.nsw.gov.au

11. Version History

The approval and amendment history for this document must be listed in the following table.

Version No	Effective Date	Approved By	Approval Date	Policy Author	Risk Rating	Sections Modified
1.0	13/07/2020	SLT	07/07/2020	Matthew Ryan	Medium	New Policy
2.0	07/08/2023	Director Legal and Corporate Governance	03/08/2023	Matthew Ryan	Medium	Update to formal definition of state record, include reference to NSWHP Information Security policy and link. Replace reference to GDA-19 with FA0427 and removal of prescriptive detail about naming and titling records for inclusion in new Records Management guideline.

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3.0	08/09/2026	Director Legal and Corporate Governance	08/09/2026	Matthew Ryan	Medium	Introducing the concept of Records365 and addition of detail on users being required to capture records into the M365 ecosystem in order to be captured into Records365. Review of responsibilities of staff in light of Records365 implementation and update of all links.
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**For Corporate Governance reference only – to be deleted when new Policy Document created **

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