



RECORDS MANAGEMENT POLICY

Policy Reference	GOV13
Date of initial Board Adoption	26 February 2020
Minutes Reference	8: 26022020
Date of Audit Committee Endorsement (if applicable)	NA
Date last reviewed by Eastern Health Authority Board of Management	4 March 2026
Applicable Legislation	<i>State Record Act 1997</i> <i>Local Government Act 1999</i> <i>Freedom of Information Act 1991</i> <i>Australian Records Management Standard AS ISO 14589-1:2016</i>

1. Purpose

The purpose of this Policy is to establish a guideline for ongoing best practice in Records Management in accordance with the *State Records Act 1997* SA ('the Act'). **Introduction**

Under this Act, EHA has an obligation to maintain official records in its custody in good order and condition. This includes obligations applies in relation to the creation, capture, storage, maintenance and disposal of physical and electronic records.

The establishment of an effective and efficient record keeping environment ensures ongoing readability, protection and retrieval and disposal of information as per State Records requirements. This Policy applies to all EHA Staff and Board Members and specifies how they will deal with the official records that they receive and generate as a consequence of their activities.

2. Scope

This Policy is made in accordance with Council's obligations and statutory requirements under the *State Records Act 1997* (SA), and in accordance with Section 99(1)(h) of the *Local Government Act 1999* (SA)

An official record is defined in section 3 of the Act to mean a record made or received by EHA in the conduct of its business. This means that, because EHA Staff and Board Members variously act as representatives of EHA, any record created, sent, received, forwarded or transmitted by EHA Staff or Board Members in the performance and discharge of their functions and duties may be classified as an official record. However, records that are merely transitory, temporary, personal or private in nature will fall outside the definition of "official records".

In addition to its record management obligations under the Act, EHA is obliged to keep adequate records in order to fulfill its responsibilities under other Acts such as the *Freedom of Information Act*

1991, as well as fulfilling legal processes, such as discovery and subpoenas. Records may also be required by Royal Commissions, the Ombudsman, the Courts, auditors and other people or bodies.

3. Principles

Good records management is of key importance to good governance. Records are vital ingredients in the support of EHA's ongoing business activities. EHA is committed to managing its records of continuing value and their timely transfer to the State Records Office in accordance with the Act, and best practice standards.

This Policy provides the procedural framework for EHA to effectively fulfill its records management obligations and to meet its business needs and statutory requirements.

4. Definition

Definitions for the purpose of this policy are:

Continuing Value records of continuing value are those that contain information that is of administrative, legal, fiscal, evidential or historical value to EHA.

Dispose of to dispose of an official record means to:

- destroy or abandon the record;
- carry out an act or process as a result of which it is no longer possible or reasonably practicable to reproduce the whole or a part of the information contained in the record; or
- transfer or deliver ownership or possession of or sell the record, or purport to do so

EHA Business includes (but is not limited to) the provision of services, delivery of programs, development of policies, making of decisions, performance of EHA functions and other similar types of transactions.

EHA staff includes persons employed by EHA, volunteers, trainees, work experience placements, independent consultants and contractors and other authorised personnel offered access to EHA's resources.

EHA Board Member includes persons nominated by Constituent Councils to the EHA Board of Management.

Electronic Record Includes email, scanned documents, and other digital content that must maintain context, content, and structure in EHA's EDRMS

Email Is a service that enables people to exchange documents or messages in electronic form. It is a system in which people can send and receive messages through their computers. Each person has a designated mailbox that stores messages sent by other users. You may retrieve, read and forward or re-transmit messages from your mailbox.

Electronic Document Records Management System: EDRMS

An automated system used to manage the creation, use, management and disposal of physical and electronically created documents and records for the purpose of:

- Supporting the creation, revision and management of digital documents
- Improving an organisations workflow
- Providing evidence of business activities

Normal Administrative Practice (NAP)

Normal Administrative Practice provides for the routine destruction of drafts, duplicates and publications, with the test that it is obvious that no information of more than transitory or temporary value to EHA will be destroyed. Material that can be disposed of under Normal Administrative Practice comprises items of a temporary or transitory nature created, acquired or collected by EHA staff or EHA Board Members in the course of their official duties. Such material has no ongoing value and is not usually incorporated into EHA's record management system.

Official Record

A record made or received by EHA in the conduct of its business, but does not include:

- a record made or received by an agency for delivery or transmission to another person or body (other than an agency) and so delivered or transmitted; or
- a record made by an agency as a draft only and not for further use or reference; or
- a record received into or made for the collection of a library, museum or art gallery and not otherwise associated with the business of the agency; or
- a Commonwealth record as defined by the *Archives Act 1983* of the Commonwealth or an Act of the Commonwealth enacted in substitution for that Act; or
- a record that has been transferred to the Commonwealth.

Record

A record as defined by the *State Records Act, 1997* means:

- written, graphic or pictorial matter
- a disk, tape, film or other object that contains information or from which information may be reproduced (with or without the aid of another object or device).

Subsidiary

an entity established by Constituent Councils to carry out functions on behalf of the Councils and subject to their oversight.

Temporary/Transitory Record

a record is transitory or temporary in nature if it is of little or no continuing value to EHA and only needs to be kept for a limited or short period of time, such as a few hours or a few days.

Vital Records records which EHA could not operate without in the event of a disaster.

5. Legislative Requirements

5.1 The Policy is to be read and implemented in conjunction with relevant legislation, standards, policies and strategies, including: *State Records Act 1997*

5.1.1 The State Records Act 1997 governs the obligations and responsibilities of EHA in relation to the management of official records. Under the Act EHA has an obligation to ensure that all official records in its custody are maintained in good order and condition.

5.2 *Local Government Act 1999*

5.2.1 The Local Government Act 1999 assigns the overall responsibility and accountability for the proper management of official records to the Chief Executive Officer of the agency. All defined local government agencies under this Act have a statutory responsibility to enforce the State Records Act 1997.

5.3 *Freedom of Information Act 1991*

5.3.1 The *Freedom of Information Act 1991* defines the rights of the public to obtain access to information held by EHA and to ensure that records held by EHA concerning the personal affairs of members of the public are not incomplete, incorrect, out-of-date or misleading, and identifies a Responsible Officer for FOI requests.

5.4 *Australian Records Management Standard AS ISO 15489-1:2016*

5.4.1 The Australian Records Management Standard AS ISO 15489-1:2016 provides best practice guidance on managing records.

5.4.2 Records must be managed to ensure integrity, authenticity, reliability, and usability, including proper metadata, version control, and audit trails.

6. Objectives

EHA uses a compliant EDRMS to store, distribute and archive corporate records. The objectives of this records management system are to ensure:

- that the management of EHA's information resources and records management system provide timely and comprehensive information to meet operational business needs, accountability requirements and community expectations; and
- the preservation of EHA's "*corporate memory*" through sound record keeping practices and the accurate capture of information to meet legal, evidential and accountability requirements.

7. Obligations of Record Users

EHA staff and Board Members

- must not intentionally damage, alter, dispose of or remove official records of EHA without authorisation to do so.

- must handle EHA records with care and respect in a sensible manner to avoid damaging records and with a view to prolonging their life span.
- must not eat or drink near EHA records or in records storage areas.
- must ensure that EHA records in any format which they personally receive or send are to be captured into EHA's EDRMS or any other appropriate record keeping systems. Records must be readily accessible to meet business and accountability requirements. Staff members are required to follow authorised procedures in carrying out records management functions and must report any loss, corruption or unauthorised access of records to the CEO immediately.

Electronic records are to be captured and maintained as functioning records by preserving their structure, context and content. In order to maintain their value as evidence, electronic records must be inviolate. That is, they cannot be altered or manipulated for as long as they are retained.

Personal record keeping systems for the capture of official records are prohibited. Records must be readily accessible to meet business and accountability requirements.

EHA staff or Board Members who do not comply with this Policy may be subject to disciplinary action under the relevant Code of Conduct Policy, and/or subject to criminal or civil proceedings. EHA staff and Board Members should report breaches of this Policy to the Chief Executive Officer of EHA.

8. Confidential Records

If an EHA staff member or Board Member believes that a record is of a highly sensitive or confidential nature, he or she should advise the Chief Executive Officer of that view. It will be at the discretion of the Chief Executive Officer as to whether such information will then be treated as confidential and access to those records restricted. Confidential records must be marked, access restricted, and handled according to authorised procedures, including electronic security protocols

9. Records Security

The security of all EHA records is crucial, as records provide evidence of business transactions, support management decisions and ensure public accountability requirements are met.

Records in all formats should be stored securely to prevent unauthorised access, destruction, alteration or removal. Digital and cloud records must be stored with appropriate encryption, access control, and audit logging.

EHA staff are responsible for the safe custody of all files and documents that are allocated to them. Sensitive or confidential information should be placed in a secure storage area when not in use. EHA's EDRMS can only be accessed by authorised and trained staff with the system providing high level secure access with full audit capabilities.

EHA records are not to be stored at home or left in cars unattended as they could be lost or damaged or stolen. Vital records are stored securely within EHA's EDRMS with any hardcopy records being stored offsite. Access to these records is restricted to the Management Team and Records Management staff. Confidential records are stored securely within EHA's EDRMS with any hard copy records kept in a locked filing cupboard within the CEOs office.

10. Responsibilities

10.1. Chief Executive Officer

The role of Chief Executive Officer of EHA, as prescribed by section 99 of the *Local Government Act 1999*, includes ensuring that records required under any legislation are properly kept and maintained.

10.2. Manager – Administration and Compliance

Responsibility for EHA's records management system is assigned to the Manager – Administration and Compliance, under the supervision of the Chief Executive Officer. The Manager – Administration and Compliance is directly accountable to the Chief Executive Officer.

The role of the Manager – Administration and Compliance is to provide a strategic focus for record keeping throughout EHA and responsibility for:

- ensuring that official records are managed in accordance with the *State Records Act*;
- establishing records management policies and procedures for EHA as a whole;
- establishing corporate standards for record keeping and records management;
- measuring performance of EHA business units against these standards;
- providing consulting services to EHA staff and EHA Board Members;
- developing corporate electronic records management strategies;
- working with other managers of information resources to develop coherent information architecture across EHA;
- working with other accountability stakeholders, and management staff, to ensure record keeping systems support organisational and public accountability; and
- providing EHA staff and EHA Board Members with appropriate training and tools to allow them to meet their records managements responsibilities.

10.3. Records Administrators of EHA

The Records Administrators are operationally responsible for supporting the Manager – Administration & Compliance in relation to records management and the efficient management of EHA Records (physical and electronic) incorporating sound record keeping principles and records management best practice guidelines.

The Records Administrators of EHA are responsible for the effective management and system administration of EHA's EDRMS.

The Records Administrators will assist EHA staff and Board Members in fulfilling their record keeping responsibilities and provide advice and training throughout the implementation of this policy, procedures and strategies.

10.4. EHA Staff and EHA Board Members

All EHA staff and EHA Board Members need to be aware of record keeping requirements that affect the performance and exercise of their duties and functions. The record keeping obligations on EHA staff and EHA Board Members include:

- making records to support the conduct of their business activities;
- creating records that would not otherwise be created;
- capturing records into paper or electronic record keeping systems;
- learning how and where records are kept within EHA;

- not destroying EHA records without authority from the Team Leader - Administration;
- not losing records; and
- being aware of records management procedures.

All contractors and consultants handling EHA records are also required to comply with this policy.

11. Destruction Methods

Official records must be disposed of in accordance with the General Disposal Schedules (GDS) 40 and 21 for Local Government Authorities in South Australia.

Where records are not covered by GDS 40, the relevant State Records SA issued General or Records Disposal Schedules and/or those implementing specific disposal freezes (restricting disposal of records which might otherwise be authorised for destruction), will be utilised to ensure adequate and authorised disposal of these records.

Transitory or ephemeral records, or records that are personal or private in nature, may be destroyed in accordance with normal administrative practice.

12. Review and Evaluation

This policy will be reviewed at least once every two years. However, EHA may revise or review this Policy at any time to ensure ongoing compliance with legislative changes (but not so as to affect any process that has already commenced).

13. Statement of Adoption

This policy was initially adopted by the Board of the Eastern Health Authority on 26 February 2020 and subsequently reviewed on 18 February 2026 .