

**INTERNAL ONLY**  
**ISLHD PROCEDURE**  
**COVER SHEET**



**Health**  
Illawarra Shoalhaven  
Local Health District

<b>NAME OF DOCUMENT</b>	WHS Data and Records Management
<b>TYPE OF DOCUMENT</b>	Procedure
<b>DOCUMENT NUMBER</b>	ISLHD OPS PROC 92
<b>DATE OF PUBLICATION</b>	September 2015
<b>RISK RATING</b>	Low
<b>REVIEW DATE</b>	September 2018
<b>FORMER REFERENCE(S)</b>	
<b>EXECUTIVE SPONSOR or EXECUTIVE CLINICAL SPONSOR</b>	Executive Director People, Change & Governance
<b>AUTHOR</b>	Safety and Well-Being Manager
<b>KEY TERMS</b>	WHS data and records, Identification and Traceability, Collection, Indexing and Filing, Storage and Maintenance, Privacy, Confidentiality and Access, Document Protection, Retrieval, Retention and Disposal.
<b>SUMMARY</b>	Manage and maintain all WHS Data and Records requirements for the Safety Management System and ensure the currency and security of records through a process for the systematic control of WHS records and their related data.

**COMPLIANCE WITH THIS DOCUMENT IS MANDATORY**

Feedback about this document can be sent to [ISLHD-CorporateGovernance@sesiahs.health.nsw.gov.au](mailto:ISLHD-CorporateGovernance@sesiahs.health.nsw.gov.au)

## 1. POLICY STATEMENT

Illawarra Shoalhaven Local Health District (ISLHD) shall manage and maintain all WHS data and records requirements for the Safety Management System and ensure the currency and security of records through a process for the systematic control of WHS records and their related data.

## 2. BACKGROUND

The Illawarra Shoalhaven Local Health District (ISLHD) Records Management Program will capture and maintain records to:

- Support ISLHD's day-to-day business activities.
- Provide evidence to ensure accountability.
- Preserve ISLHD's corporate memory.

Records need to be organised, managed and protected in conditions appropriate to their context and nature and to ISLHD's needs. Records will be preserved so that they remain usable and accessible for as long as they are required.

## 3. RESPONSIBILITIES

### 3.1. Workers will:

- Comply with all instructions provided for WHS Data and Records Management, including the information in this procedure.

### 3.2. Line Managers will:

- Implement the WHS Data and Records Management procedure, which includes, but is not limited to, completed copies of forms, checklists, or risk assessments contained in the Work Health Safety Management System.
- Ensure WHS records and associated requirements are listed in the *Master WHS Records Index* and *Local WHS Record Index* as required.

### 3.3. Network Managers/Service Managers will:

- Monitor the implementation of the WHS Data and Records Management procedure, which includes but is not limited to, completed copies of forms, checklists or risk assessments contained in the WHS Management System.
- Ensure WHS records and associated requirements are listed in the *Master WHS Records Index* and *Local WHS Record Index* as required.
- Resolve WHS Data and Records Management Program management issues in a timely and informed manner.

### 3.4. Chief Executive will:

- Ensure a process is in place to develop and implement the WHS Data and Records Management Program.
- Ensure resources, time, money, and technology is available to support the WHS Data and Records Management Program.

#### **4. PROCEDURE**

- The process includes controls for:
  - Creation.
  - Receipt.
  - Secure storage.
  - Maintenance.
  - Access.
  - Use.
  - Disposal.
- It shall conform to the Data and Records Management work cycle and include a register or procedure that provides an easy means of identification and inspection of records by the relevant persons.
- Records shall contain the appropriate amount of data and information to demonstrate conformance to the measuring and monitoring requirements of this standard. They shall be legible, identifiable and traceable.
- The confidentiality and security of data and records shall be maintained relative to their source and in accordance with any applicable external data/privacy protection legislation.
- Personal information originating from medical surveillance and occupational hygiene monitoring shall be reported in a form that respects the privacy of the individual, but enables management to fulfil their duty of care obligations to workers. The names of individuals shall not be disclosed without their written authorisation.
- Medical examination reports shall be dated and signed by the examining physician, nurse or equivalent. They shall be legible and include a printed name to assist with identification and authentication of the results (electronic signature is acceptable).
- Retention periods for all records shall be established and documented.

##### **4.1. WHS Records and Data**

- WHS records and data include, but are not limited to, completed copies of forms, checklists or risk assessments contained in the WHS management system.
- Additionally, WHS records may include externally produced documentation such as, but not limited to, safety data sheets, external WHS audit reports, health surveillance records or workplace monitoring reports.

##### **4.2. Identification and Traceability**

- Whether a record is stored locally or centrally in electronic or hardcopy form, the records shall be traceable.
- The record is required to be assigned a unique identifier.
- Traceability of a record will come from identification methods (e.g. alpha-numeric, sequential numbering, computer generated and managed record management).
- WHS records and associated requirements shall be identified according to the *Master WHS Records Index* and *Local WHS Record Index*.

#### **4.3. Collection, Indexing and Filing**

- WHS records and associated requirements listed in the *Master WHS Records Index* and *Local WHS Record Index* are required to be collected when the documents are generated in preparation for indexing and filing.
- Records will be indexed or otherwise sorted, using a method appropriate to their type and security classification as defined in *Master WHS Records Index*.
- Electronic WHS central records are assigned metadata in accordance with *WHS Document Control*.
- The records shall be filed and arranged in convenient order for storage or reference. Filing of records is based on file type, such as hard copy or electronic media, and must be filed in a state that is secured to prevent unauthorised access. Files must be indexed to minimise loss and enable easy retrieval.
- Records located locally shall be filed in accordance with the *Local WHS Records Index* to ensure the index/sorting method adopted for that type of record and security level for subsequent ease of retrieval.

#### **4.4. Storage and Maintenance**

- Where possible the storage and maintenance of all WHS records shall be in accordance with the requirements specified in the *Master WHS Records Index* or *Local WHS Records Index*.
- All externally generated records (e.g. audit reports or improvement notices) will be stored in ISLHD's Records Management System by Workforce Health and Safety.

#### **4.5. Privacy, Confidentiality and Access**

- All data and information contained within WHS records shall observe the Privacy Policy.
- Any WHS records that require the collection of private or confidential information shall be identified in the *Master WHS Records Index* and *Local WHS Records Index* where appropriate to do so.
- Any document listed as having privacy or confidentiality properties shall have its access restricted to personnel with legitimate business needs.
- For example: restricted access to hard copy records includes using a locked filing cabinet and restricted access to electronic records includes password encryption or electronic workgroups. Access to records is only for persons specifically authorised (e.g. central records are restricted and may only be retrieved by a member of Workforce Health and Safety).
- A person wishing to access a restricted record must make a request in writing, which will be considered by the Manager of Workforce Health and Safety, with reference to the Privacy Policy, before the record is released.
- The appropriate procedure for access to these records shall be identified on the local record index.

#### **4.6. Document Protection**

- Levels of security on the specific electronic systems control electronic records.

- Changes to security levels can only be made in accordance with IT Security Policies.

#### **4.7. Retrieval**

- Records shall be retrieved using the appropriate retrieval process for the record stored. Electronic records may be retrieved using electronic system search and retrieval mechanisms, hardcopy records must be retrieved using a manual process.
- Retrieval of records is for persons authorised to access such record (e.g. central records are restricted and may only be retrieved by a member of Workforce Health and Safety).

#### **4.8. Retention and Disposal**

- WHS records are to be retained in accordance with the requirements specified in the *Master or Local WHS Records Index*.
- Methods for disposal of documents shall be prescribed in the *Master and Local Records Index*.

#### **4.9. Master WHS Record Index**

- Updating (addition, modification, removal) of records contained in the *Master WHS Record Index* occurs as, and when, the requirements of the WHSMS change (as per Document Control Procedures).
- The *Master WHS Record Index* is a list of records to be kept, as per the WHSMS. The index details the:
  - System component requiring the record.
  - Type of record.
  - Location of the storage.
  - Custodian or responsible officer.
  - Confidentiality and privacy requirements.
  - Time period for keeping the document.
  - Method for disposing of the document.

#### **4.10. Local WHS Record Index**

- Any local WHS record created within faculties will be recorded on the *Local WHS Record Index*. The *Local WHS Record Index* should reflect those requirements outlined in the *Master WHS Record Index* and list any local records created or required at a local level.
- The *Local WHS Records Index* should be regularly reviewed and updated to ensure consistency with local record keeping requirements and those set out in the *Master WHS Record index*. Local records are those forms that have been completed, for example risk assessments, safe work procedures etc.
- These should be kept in the *Local Record Index*.
- The Local WHS Record Index outlines the requirements for typical WHS records for each local area and includes the following:

- Record Name.
- Index requirements.
- Filing and local storage details.
- Retention period.
- Records sensitivity classification.
- Any localised procedure for access.
- Disposal requirements.

#### **4.11. Licences**

- There are activity types that require a licence or qualification (e.g. an electrician, or driving a forklift). Faculties, services, or departments are required to collect and maintaining these records consistent with record keeping requirements.
- The *WHS Training Development Procedure* outlines requirements for demonstrating competency where activity types require a licence or qualification.

### **5. DOCUMENTATION**

- Master WHS Records Index
- Local WHS Records Index

### **6. AUDIT**

Compliance with this procedure will be audited through internal and external review mechanisms at least every two years.

### **7. REFERENCES**

- [NSW Health Policy Directive Work Health and Safety: Better Practice Procedures PD2013\\_050](#)
- [Work Health and Safety Act 2011 No 10](#)
- [Work Health and Safety Regulation 2011](#)
- [Code of Practice – How to Manage Work Health and Safety Risks](#)
- AS/NZS 4801 Occupational Health and Safety Management Systems, Section 4.4.5 Document and data control
- AS/NZS 4801 Occupational Health and Safety Management Systems, Section 4.5.3 Records and records management

### **8. REVISION AND APPROVAL HISTORY**

<b>Date</b>	<b>Revision No.</b>	<b>Author and Approval</b>
August 2015	0	Safety and Well-Being Manager ISLHD Safety Management System Review and Implementation Approved by Executives Management Committee April 2015