

# Disposal of corporate records

## Department of Health Standard

QH-IMP-467-5

### 1. Statement

The *Public Records Act 2023* requires Queensland State Archivist permission to dispose of records. Where disposal of records occurs without authorisation, this constitutes a breach of the *Public Records Act 2023* and is subject to 165 penalty units. It is unlawful to attempt disposal of a public record without authorisation.

Records must be retained for a minimum period of time in accordance with a State Archivist approved disposal authority and any disposal of records must be approved by the Chief Executive (or an approved delegate) of the public authority. For the Department of Health (the department) these authorisations for disposals of the department's corporate records are enabled through the Instrument of Delegation – Public Records Act.

### 2. Purpose

This standard describes the minimum requirements for the disposal or permanent transfer of corporate records for the department. It is part of the [Corporate Records Management Policy Framework](#) which exists to ensure records are made, kept, and where authorised, disposed appropriately.

In this standard, disposal has the same meaning as 'disposal' in the *Public Records Act 2023*, namely: **disposal**, of a public record means —

- a) destroying, or delete the record, or
- b) alter, or damage the record in a way that
  - (i) changes how accurately an action or decision is shown in the record, or
  - (ii) otherwise affects the integrity of the record.
- c) abandon the record
- d) or give away the record, whether by sale, donation, or other transfer.

### 3. Scope

This standard applies to all employees, contractors and consultants working within, or for, the department. It applies to:

- corporate records – it does not include clinical records.
- all formats (physical and digital) regardless of the system in which they are maintained.

This standard may be adopted, or re-branded, for use by Hospital and Health Services (HHS) or statutory bodies. As each HHS is a separate public authority under section 8(1)(g)(i) of the *Public Records Act 2023*, it is the responsibility of each HHS to ensure their public authority complies with the Act.

## 4. Requirements

### 4.1. Lawful disposal

Disposal must be lawful.

Disposal refers to the actions required to ensure that records are destroyed in an appropriate manner and with appropriate approval, such that they cannot be reconstituted, recreated or reconstructed. Disposal also refers to permanent change of custody, for example if records are transferred to another agency as part of an administrative change or when records are donated.

- 4.1.1. Records must have Queensland State Archivist authorisation to be lawfully disposed.

*The disposal of a record or an attempt to dispose of a record without authorisation from the State Archivist is an offence under the Public Records Act 2023. State Archivist authorisation is typically provided through approval of a retention and disposal schedule or through individual disposal authorisations assigned to a class of records. The action of disposal of the record also requires the delegated authorisation from a nominee in line with the Instrument of Delegations – Public Records Act.*

- 4.1.2. Records must be sentenced using a retention and disposal schedule (or disposal authorisation) available for Queensland Health use. This includes:
- Queensland State Archives (QSA) - General Retention and Disposal Schedule for Administrative Records
  - Queensland Health agency or sector schedules
  - Another Queensland agency or sector schedule (or disposal authorisation) approved by the State Archivist for use by Queensland Health.
- 4.1.3. Records must be sentenced to a class of records that appropriately describes the subject matter of the records being sentenced.
- 4.1.4. Records must be retained for at least the minimum retention period for the class of record.
- 4.1.5. Where no class of record appropriately describes the subject matter of records being sentenced, these 'gap' records must be retained indefinitely until they are included in a retention and disposal schedule (or disposal authorisation) available for Queensland Health use.
- 4.1.6. Where there is overlap between records covered by QSA - General Retention and Disposal Schedules and a Queensland Health agency or sector schedule, the records must be sentenced using the longer retention period.
- 4.1.7. Records that contain mixed content (i.e. comprised of multiple records classes) must be sentenced in accordance with the records class with the longest retention period.

- 4.1.8. When sentencing records with multiple parts, all parts must be sentenced as a complete record where there is a genuine relationship between the content of the parts.
- Includes records that are historically or evidentially related and deletion of a part of the record adversely affects the continuity of, or completeness of, the record in its entirety (e.g. personnel files, case files etc.).
  - Excludes records that have no direct relationship to other contained records (e.g. batches of invoices etc.).
- 4.1.9. Records must be reviewed prior to disposal to ensure:
- The record has been assigned to an appropriate class within a retention and disposal schedule available for Queensland Health use.
  - The retention and disposal schedule is current and has not been superseded.
  - The record is not required to be retained for longer due to a disposal protection notice, or to satisfy other business, legal or legislative requirements.
- 4.1.10. Prior to disposal, final authorisation for the disposal of records must be attained from the Chief Executive (or an approved delegate) in accordance with departmental delegations [Instrument of Delegation - Public Records Act](#).
- 4.1.11. The disposal method for physical records or media holding records must be commensurate with the information security classification assigned to the record.
- 4.1.12. Evidence of the disposal of the records must be retained as a record in the recordkeeping system. This includes:
- **Disposal log.** This must contain: disposal schedule name (and version if applicable); record class; description of records; and date range.
  - **Disposal approval.** Evidence of approval by the Chief Executive (or an approved delegate).
  - **Evidence of destruction.** This must provide evidence of destruction from a service provider or a certificate specifying the method, place and date of destruction plus details of the staff that carried out the destruction.
  - **Recordkeeping metadata.** The metadata of the records that have been destroyed must be updated to reflect the disposition (e.g. destroyed) and date of destruction. If this is not possible, a control register of disposal metadata is required.
- 4.1.13. Transitory and short-term records, as identified in the QSA [General Retention and Disposal Schedule](#) do not require formal destruction approval or documentation.

## 4.2. Permanent transfer of records to or from another agency

Permanent transfer of records is a disposal action and must be compliant with legislation and policy.

Permanent transfer of records refers to the transfer of records, and all responsibilities associated with those records, to another public authority under a machinery-of-government administrative change or another agreed change in the management of those records.

4.2.1. Permanent transfer of records is a form of records disposal which must be authorised by the Chief Executive (or an approved delegate) and includes:

- Transfer of records to another public authority or HHS.
- Receipt of records from another public authority or HHS.

4.2.2. The execution of the permanent transfer of records must include:

- Secure transfer of all records artefacts (digital or physical).
- The transfer of recordkeeping metadata.
- A letter authorising the transfer of records.
- A letter acknowledging receipt of transfer.

4.2.3. Documentation providing evidence of the disposal or receipt of records by permanent transfer must be retained in accordance with the minimum retention period identified in the QSA General Retention and Disposal Schedule. Documentation to be retained includes:

- Transfer approval and receipt of transfer.
- A catalogue of all records transferred (i.e. recordkeeping metadata).

4.2.4. Recordkeeping metadata must be captured and/or updated in an approved recordkeeping system or approved business system to reflect the current disposition, location and date of the transfer.

*Corporate Information Management (CIM) is the key contact for coordinating the permanent transfer of records into and out of the department.*

## 4.3. Permanent transfer to archives

Under certain circumstances, permanent value records may be transferred to QSA. In such circumstances, the department remains the responsible agency and Chief Executive (or authorised delegate) approval is not required.

4.3.1. To be eligible for permanent transfer to QSA, records:

- Must be designated as a permanent record through a current retention and disposal schedule.
- Must be inactive and no longer required by the department for business use.

- Must meet any QSA eligibility criteria which may be in force at the time.
- 4.3.2. A comprehensive list of records to be considered for transfer to QSA must be provided to CIM. This includes:
- All items individually listed (e.g. files folders, registers, maps etc.) including separate list items for all file parts.
- CIM will liaise with QSA to arrange transfer (if approved) and for an authorised delegate to assess the records for appropriate restricted access periods.

#### 4.4. Decommissioning systems and disposing hardware

The disposal of records held in ICT business systems must be managed.

Business systems and hardware such as computers, tablets and other mobile devices, may hold records and as such, the disposal of records held in these business systems must be managed. Decommissioning or disposing of these systems and hardware may result in the unintended and accidental disposal of records.

- 4.4.1. Prior to the disposal of any hardware such as computers, tablets and mobile devices, records contained on the hardware must be captured into an approved recordkeeping system or approved business system if not already captured.
- 4.4.2. The decommissioning of any business systems must be in accordance with the Queensland State Archives decommissioning business systems workflow and methodology.
- 4.4.3. The disposal method for any decommissioned business systems, hardware, or media holding records (including information and/or data) must be commensurate with the highest information security classification of the records in accordance with the Queensland Health Information Security Policy.

#### 4.5. Unlawful disposal

Suspected or identified unlawful disposal of records must be managed.

Unlawful disposal refers to any disposal of records that is not authorised by the Queensland State Archivist through a current retention and disposal schedule, or other legal authority, and is not endorsed by the department's Chief Executive (or authorised delegate). This includes records that are:

- Lost through natural disasters or other circumstances beyond our control.
- Abandoned such that they are subject to damage or loss through neglect.
- Sold, donated or given away without appropriate approval.
- Maliciously altered by adding to, deleting, revising or obliterating information to modify the meaning or intent of the record or render it unusable.
- Lost in any other way so as to have the records outside the control of the department.

Unlawful provisions and penalties apply whether or not the records are managed in recordkeeping or approved business systems.

- 4.5.1. Records that are lost or disposed without appropriate authorisation must be reported to CIM, as there are requirements to also report these instances to Queensland State Archives as the regulator of the *Public Records Act 2023*.

*CIM is responsible for reporting lost records to QSA and keeping records detailing instances of unlawful disposal of records including the notification of lost public records and the acknowledgement receipt from QSA.*

## 5. Legislation

### 5.1. Queensland Government Legislation

- *Electronic Transactions (Queensland) Act 2001*
- *Evidence Act 1977*
- *Financial Accountability Act 2009*
- *Financial and Performance Management Standard 2019*
- *Hospital and Health Boards Act 2011*
- *Information Privacy Act 2009*
- *Public Health Act 2005*
- *Public Records Act 2023*
- *Public Sector Act 2022*
- *Right to Information Act 2009*

### 5.2. Queensland Government policy:

- Information Access and Use Policy (IS33)
- Information Asset Custodianship Policy (IS44)
- Information Security Classification Framework (QGISCF)
- Information Security Policy (IS18:2018)
- Private Email Use Policy
- Public Service Code of Conduct
- Queensland Recordkeeping Metadata Standard and Guideline
- Records Governance Policy

## 6. Supporting documents

### 6.1. Corporate Records Management Policy Framework:

- Corporate Records Management Policy
- Corporate Records Roles and Responsibilities Standard
- Creation of Corporate Records Standard
- Use of Corporate Records Standard
- Digitisation Disposal of Corporate Records Standard
- Disposal of Corporate Records Standard (this document)
- Identification of Corporate Records Guideline

### 6.2. Other related documents:

- Clinical Records Management Policy
- Data and Application Custodianship Policy
- Data and Application Custodianship Standard
- Data and Application Custodianship Roles and Responsibilities
- Information classification and handling Standard
- Information Security Policy
- Instrument of Delegation for the Public Records Act
- Use of electronic approvals FMPM Standard 7.3.2
- Use of ICT services and devices Policy suite.

## 7. Definitions

Term	Definition
Active Management of a public record	The business owner of the permanent or high risk record is required to capture and manage these records in either an approved business system, or approved recordkeeping system.
Application Custodian	<p>A position designated with overall accountability and responsibility for decision making in relation to the ongoing development, management, compliance, care and maintenance of an application to support business needs.</p> <p>See also: Data Custodian; Approved Business System</p>
Approved Business System	<p>An approved business system (for the purpose of recordkeeping) is a system that has been assigned a Data Custodian and/or Application Custodian in accordance with the Data and Application Custodianship Policy.</p> <p>Custodians are responsible for understanding, managing and controlling risks associated with applications and the collections of data held within these applications. They are also responsible for ensuring that legal, regulatory, policy, standards and other business requirements of the application continue to be met.</p> <p>See also: Application Custodian; Data Custodian</p>
Approved Recordkeeping System	An approved recordkeeping system refers to the department's electronic Document and Records Management System (eDRMS) or legacy Records Management System.
Born Digital	Materials that originate in digital form (digitally native), not created on paper nor any other analogue source.
Business Classification Scheme (BCS)	A BCS is a records management tool used to categorise information resources in a consistent and organised manner. It is comprised of a hierarchy of terms that describe the broad business functions of the department and the activities and transactions that enable those functions to be delivered.
Chief Executive	<p>The Executive Officer means the Director-General, Queensland Health, who has ownership of all Queensland Health records, and is responsible for records in the custody of the department.</p> <p>The Chief Executives of the HHSs are responsible for the custody and disposal of records in their HHS.</p>
Clinical Records	A collection of data and information gathered or generated to record the clinical care and health status of an individual or group. Also referred to as a health

Term	Definition
	record, medical record or healthcare record. Refer Clinical Records Management Policy (QH-POL-280:2014).
Confidential Information	<p>In this policy, confidential information has the same meaning as ‘confidential information’ in the <i>Hospital and Health Boards Act 2011</i> (HHB Act), namely:</p> <p><b>confidential information</b> means any information that —</p> <ul style="list-style-type: none"> <li>(a) is about a person who is receiving or has received a public health sector health service; and</li> <li>(b) could identify the person.</li> </ul> <p>Confidential information most often relates to patients of Queensland Health (including deceased persons) and can include information such as patient UR number, name, address, date of birth, admission and discharge dates, billing information, Medicare number, medical record and referrals (note this list is not exhaustive).</p> <p>For further information, you can refer to the department’s <a href="#">Confidentiality General Principles</a> to understand the duty of confidentiality and the circumstances when ‘confidential information’ may be disclosed.</p> <p>It is an offence to disclose ‘confidential information’ about a person unless one of the exceptions in Part 7 of the HHB Act applies.</p> <p>See also: Information Privacy; Personal Information; Right to Information</p>
Corporate Records	Records that are administrative and non-clinical functions of the department (e.g. executive correspondence, finance, human resource, legal, research, scientific, cancer screening etc.).
Data Custodian	<p>A position designated with overall accountability and responsibility for decision making in relation to the data set, data collection and/or application allocated and the ongoing capture, compliance, development, management, care and maintenance of data to support business needs.</p> <p>See also: Application Custodian; Approved Business System</p>
Digital Records	<p>Digital records created, communicated and/or maintained by means of electronic or computer technology, including both ‘born digital’ records and records that have been digitised.</p> <p>See also: Physical Records</p>
Digitisation	The creation of digital images from paper documents by such means as scanning or digital photography.

Term	Definition
Digitisation Disposal	The disposal of paper records after they have been digitised in accordance with the minimum requirements of the QSA Guideline – Dispose of Source Records.
Digitised	A digital version of material that originated in a physical or analogue state.
Disposal	<p>In this policy, disposal has the same meaning as ‘disposal’ in the <i>Public Records Act 2023</i>, namely:</p> <p><b>disposal</b>, of a public record means -</p> <ul style="list-style-type: none"> <li>a) <i>destroying, or delete the record, or</i></li> <li>b) <i>alter, or damage the record in a way that</i> <ul style="list-style-type: none"> <li>(iii) <i>changes how accurately an action or decision is shown in the record, or</i></li> <li>(iv) <i>otherwise affects the integrity of the record .</i></li> </ul> </li> <li>c) <i>abandon the record; or give away the record, whether by sale, donation, or</i></li> <li>d) <i>other transfer.</i></li> </ul> <p>Records disposal includes the following activities:</p> <ul style="list-style-type: none"> <li>• <b>Destroy:</b> complete and irreversible physical erasure of the record, ensuring it cannot be reconstituted, recreated or reconstructed</li> <li>• <b>Transfer:</b> permanent transfer to another public authority because of a machinery-of-government change</li> <li>• <b>Sell:</b> records cannot be sold, except if an agency or function is sold or privatised (i.e. under a machinery-of-government change)</li> <li>• <b>Donate:</b> giving records to a museum or historical society must be authorised by the State Archivist</li> <li>• <b>Loss or damage:</b> because of a disaster or other circumstances beyond an agency’s control, such as contamination</li> <li>• <b>Abandon:</b> neglect, which can lead to loss or damage to records, is a form of disposal</li> <li>• <b>Amend:</b> unauthorised changing of a record by addition, deletion, revision or obliteration of information, particularly if it modifies the meaning or intent of the record’s content or renders it unusable.</li> </ul>
Disposal Protection Notice	An authority issued by the Queensland State Archivist, by Court issue or an agency’s CEO (or delegate) that requires a temporary cessation of the destruction of public records relating to a specific topic or event. Once issued, a Disposal Protection Notice overrides any other authority to dispose records.

Term	Definition
Disposal Status	<p>Indicates the archival value of the records. Records may either be:</p> <ul style="list-style-type: none"> <li>• Permanent - meaning records should be transferred to QSA once they are no longer required for business purposes</li> <li>• Agency Permanent – meaning the records are not required by QSA once they are no longer required for business purposes. They are to be retained permanently by the agency</li> <li>• Temporary - meaning that the records may be disposed of once the minimum period for which the records must be retained in line with the QSA approved retention and disposal schedule has expired and the records are not required for any further legal or business purpose.</li> </ul>
Electronic Document and Records Management System (eDRMS)	<p>eDRMS is an automated system used to manage documents and records in a secure manner throughout the information management life-cycle, from creation to disposal. Its purpose is to support the creation, revision and management of digital documents, improve an organisation's workflow, improve tracking, reporting and searching capability of correspondence and provide evidence of business activities.</p> <p>The department's eDRMS is Content Manager for corporate records.</p>
Electronic Records	See: Digital Records
Exchange and Microsoft Outlook	<p>Exchange and Microsoft Outlook provides corporate email system that provides secure messaging, calendaring, and scheduling capabilities.</p> <p><b>Note:</b> Exchange and Microsoft Outlook is not an approved business system or approved recordkeeping system for the active management of corporate records.</p> <p>Any corporate records held in Exchange or Microsoft Outlook that are <b>permanent</b> or <b>high risk records</b> must be transferred to an approved business system or approved record keeping system to ensure active management.</p>
Hybrid Record	Records comprising paper, digitised and electronic formats, created and accessed using both manual and electronic processes.
Information Privacy (IP)	<p>Information Privacy for Queensland Government is legislated through the <i>Information Privacy Act 2009</i> (IP Act) which recognises the importance of protecting the personal information of individuals.</p> <p>Under the IP Act, health agencies must comply with the privacy principles contained in the IP Act, which include</p>

Term	Definition
	<p>the nine National Privacy Principles (NPPs) and provisions regarding contracted service providers and the transfer of personal information out of Australia. These rules govern how personal information must be collected, stored, used and disclosed.</p> <p>The IP Act also allows an individual to seek access to their own personal information or make a complaint about a breach of the privacy principles.</p> <p>See also: Right to Information; Personal Information; Confidential Information</p>
Information Security	<p>The protection of information from unauthorised use or accidental modification, loss or release. Information security is based on three elements:</p> <ul style="list-style-type: none"> <li>• confidentiality – ensuring information is only accessible to authorised persons;</li> <li>• integrity – safeguarding the accuracy and completeness of information and processing methods; and</li> <li>• availability – ensuring that authorised users have access to information when required.</li> </ul>
Intrinsic Value	<p>Records with intrinsic value have many similar characteristics as enduring value but may not have a permanent retention period. Intrinsic value refers to the special qualities and characteristics of the original medium that contribute to the record's significance. The characteristics that make the record special could be lost or diminished if the physical source record is destroyed and only the content is retained.</p>
Metadata	<p>Data that describes the content, context and structure of records.</p> <p>Metadata is structured or semi-structured, descriptive information about a record and usually includes the title of the record, author, date created, any changes to the record, and applicable disposal or sentencing information. Recordkeeping metadata enables a record to be managed over time and assists in identifying and retrieving records and supporting long term record functionality, reliability, and effective preservation or disposal authentication.</p>
Optical Character Recognition (OCR)	<p>OCR is a technology that enables conversion of different types of documents, such as scanned paper documents, PDF files or images captured by a digital camera into editable and searchable data.</p>
Office 365 SharePoint	<p>Is a web-based tool to enable sharing documents, sharing file links (instead of email attachments), and working documents.</p>

Term	Definition
	<p>SharePoint allows people to collaborate and share ideas without the limitation of location.</p> <p><b>Note:</b> Office 365 (including Microsoft SharePoint and Teams) is not an approved business system or approved recordkeeping system for the active management of corporate records.</p> <p>Any corporate records held in Office 365 (including Microsoft SharePoint and Teams) that are <b>permanent</b> or <b>high risk records</b> must be transferred to an approved business system or approved recordkeeping system to ensure active management.</p>
Office 365 Teams	<p><b>Note:</b> Office 365 (including Microsoft SharePoint and Teams) is not an approved business system or approved recordkeeping system for the active management of corporate records.</p> <p>Any corporate records held in Office 365 (including Microsoft SharePoint and Teams) that are <b>permanent</b> or <b>high risk records</b> must be transferred to an approved business system or approved recordkeeping system to ensure active management.</p>
Personal Information	<p>Personal information is information or an opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in a material form or not, about a person whose identity is apparent or whose identity can be reasonably ascertained from the information or opinion.</p> <p>See also: Information Privacy; Right to Information</p>
Physical Records	<p>A record that is tangible and takes up physical space (e.g. paper, photographs or index cards).</p> <p>See also: Digital Records</p>
Queensland State Archives (QSA)	<p>Office established under the <i>Public Records Act 2023</i> responsible for the development and promotion of effective methods, procedures, and systems for making, managing, keeping, storing, disposing of, preserving and using public records.</p>
Record	<p>Record has the same meaning as ‘public record’ in the <i>Public Records Act 2023</i>, namely:</p> <ul style="list-style-type: none"> <li>- information recorded on, in or by using any medium and is made, received, or kept by the department in the carrying out of activities for the department, and evidences its activities, affairs or business.</li> </ul> <p>In line with the whole-of-government Records Governance Policy, the department requires records that are permanent or high-risk to be actively managed.</p>

Term	Definition
Recordkeeping	The act of making, keeping and preserving evidence of government business in the form of recorded information.
Retention and Disposal Schedule (R&DS)	A document issued by the State Archivist authorising the disposal of public records. It defines the temporary or permanent status, retention periods, disposal triggers and consequent disposal actions authorised for classes of records described in it.
Retention Period	The minimum period of time that records need to be kept before their final disposal as specified in an authorised R&DS.
Right to Information (RTI)	<p>The RTI process established by the Queensland Government aims to give the community greater access to information, and also provides the right to apply for access to government held information, unless on balance it is contrary to the public interest to provide that information. This process is governed by the following two statutory instruments.</p> <ul style="list-style-type: none"> <li>• <i>Right to Information Act 2009</i> which allows you to apply for access to documents held by Queensland Government agencies</li> <li>• <i>Information Privacy Act 2009</i> which in addition to the privacy principles, allows individuals to apply for access to, and amendment of, their own personal information held by Queensland Government agencies.</li> </ul>
Sentencing	The process of identifying the disposal class a record belongs to and applying the disposal action specified in the relevant R&DS to the record. Sentencing is the implementation of decisions made during appraisal.
Source records	Documents or records that have been copied, converted or migrated from one format or system to another. The source records are those that remain following the successful conversion or migration. Source records may be an original record or a reproduction generated by an earlier copying, conversion or migration process.
Transitory and Short Term Records	<p>Records that have a low or limited value, and therefore are only required to be kept for a short period of time (e.g. 2 days, 1 week, until business use ceases).</p> <p>They are generally created as part of routine transactional business practices and are not required to support the business functions of an agency. They also have little or no value to the agency or community.</p>

## 8. Approval and implementation

Policy Custodian	Policy Contact Details	Approval Date	Approver
Executive Director, Governance Assurance and Information Management Branch	<a href="mailto:Records-Corporate@health.qld.gov.au">Records-Corporate@health.qld.gov.au</a>	16 April 2025	Deputy Director-General, Corporate Services Division

## Version control

Version	Date	Comments
v1.0	27 March 2020	New standard
v1.1	20 October 2021	Approved. Minor amendments (updated references to legislation, standards and policies).
V1.2	25 October 2022	Minor amendments. (Change Branch name as a result of Department of Health's Business Case for Change from Risk, Assurance and Information Management Branch).
V1.3	16 April 2025	Minor Amendments. Change legislation and check for alignment to the new Public Records Act 2023. review for consistency of definitions, and layout.  IMSGC Approved.  Approved Deputy-Director General, Corporate Services Division.