WHSMS Records and Document Management Procedure

Section 1 - Governing Policy

(1) This Procedure is governed by the Work, Health, Safety and Wellbeing Policy.

Section 2 - Scope

(2) This Procedure applies to all staff, staff representatives, students, visitors, volunteers and contractors, and the activities that the University manages and influences.

Section 3 - Background

(3) This Procedure is a core requirement of International Standard ISO 45001 which outlines the requirements of Work Health and Safety Management Systems. This Procedure and complementary University policies and procedures also support the University to implement and continuously improve its Work Health and Safety Management System (WHSMS or framework) and comply with its governance obligations that are associated with managing records.

(4) Robust records management practices also support the University to retain knowledge, improve efficiencies and decision making and demonstrate compliance with legal and other requirements. Effective record management practices also provide evidence to auditors the WHSMS is being implemented and continuously improved within portfolios and organisational units.

(5) The Procedure also supports organisational units to quickly and easily retrieve WHSMS records.

Section 4 - Roles and Responsibilities

Table 1: A high-level overview of staff members' responsibilities for managing WHSMS documents and records

Who	Roles
Staff	Implement and confidently apply sound, WHSMS records and document management practices.
Nominated Supervisors and Managers	Ensure that WHSMS record management practices are effectively implemented within their work area.
Executive staff within organisational units	Assign responsibility to staff or work areas to maintain their local WHSMS Records Register and ensure that sound records management practices are implemented within their organisational unit. They also engage relevant managers and staff about their record management responsibilities and how they contribute to the WHSMS or framework.

Who	Roles
People and Capability	Supports the Executive and Senior Executive to determine the scope of WHSMS records collected and managed. The Directorate is the service lead for the framework and develops, maintains and facilitates reviews of the WHSMS Records and Document Management Procedure and the associated WHSMS Records Management Register, and other University WHSMS systems and processes.
Legal, Assurance and Governance Directorate	Facilitates ongoing determinations about the University's Authorised Business Systems and supports organisational units to use recommended systems such as the HPE Content Manager (TRIM). The Directorate also develops information management policies and procedures that inform the University records management practices, including the WHSMS Records and Document Management Procedure, and governance with records management requirements.
Senior Executive and Executive, incl. Work Health and Safety Management Committee	Determines the scope of WHSMS records to be captured and managed, and ensures that work areas that they manage, or influence are applying this Procedure and are engaged about contributing to the WHSMS.
Vice-Chancellor and President	Responsible for WHSMS Records and Document Management at the University.

Section 5 - Types of Records to be Maintained

(6) The types of WHSMS records that should be managed by organisational units is informed by an assessment of their own record keeping needs and WHSMS Records Register - Appendix A (refer to last column of ACU WHSMS Records Register). The University's WHSMS Records Register mirrors the requirements of International Standard ISO 45001, for WHSMS, and determinations made by the University about what records it requires to maintain and continuously improve its framework.

Section 6 - Developing and Managing Records Registers

(7) WHSMS Records Registers should be reflective of the types of records that are managed by organisational units and the University. These registers should be regularly reviewed and updated to ensure consistency with local record keeping requirements and the WHSMS Records Register.

WHSMS Records Registers Managed by Organisational Units

(8) Local WHSMS Records Registers, managed by organisational units, should include a comprehensive list of the categories of records managed by these work areas. These requirements are informed by WHSMS Records Register - Appendix A and work areas' assessments of their own needs.

Table 2: Headings for a local WHSMS Records Register and sample entries.

Organisational Unit:		Last Updated: 2019/05/03
Record Management References:		

Type of Records	File Path (HPE Content Manager or name of Authorised Business System)	Resp. Staff Member	Minimum Retention Period	Access Restricted? (Y/N/AR: As Required)	Disposal and Archiving Methods
WHS Improvement Opportunities					

Type of Records	File Path (HPE Content Manager or name of Authorised Business System)	Resp. Staff Member	Minimum Retention Period	Access Restricted? (Y/N/AR: As Required)	Disposal and Archiving Methods
WHS Inspections	WHS improvement Opportunities/WHS Inspections	Joanne Capri	7 Years	N	Place completed inspection forms, which were completed more than 2 years ago, in the archive folder. Delete if more than 10 years' old.

Note: This is an example of the type of records that should be retained by organisational units and entered into an organisational unit WHSMS Records Register.

(9) Executive staff or their nominees, within relevant organisational units, should assign responsibility to relevant functional units or staff for maintaining their register and all staff are responsible for maintaining adequate and accurate records. Whenever staff are unsure about record management practices, they should discuss this with their Nominated Supervisors or Manager about these requirements and how they contribute to the WHSMS.

ACU WHSMS Records Register

(10) The types of records retained by the University will change as the University's WHSMS evolves and is continuously improved. Regular reviews of the framework will inform the types of records that are maintained.

(11) The index, within the register, includes the following information:

a. Types of records that should be kept by the University and organisational units;
b. File path or medium e.g. Riskware (stored on an Approved Business System);
c. The responsible staff member;
d. Retention period;
e. Any confidentiality and privacy requirements; and
f. Disposal and archiving requirements, including method(s).

(12) The register is maintained by People and Capability staff and a review of the types of records captured will be conducted whenever the WHSMS is reviewed by the University. See WHSMS Records Register - Appendix A.

Section 7 - Apply the Naming Convention

(13) Every organisational unit should title folders, records and documents in a meaningful, unique and consistent way so that they can be quickly and easily retrieved during a document search.

Table 3: Guidance about naming records in a meaningful, unique and consistent way

Titles Should be:	How?	Examples
Meaningful	• Describe what type of document it is; • Include the subject; • Ensure that it relates to a specific author/work area /committee.	20190804 WHS Inspection Simulated Services Laboratories Melbourne Final.docx

Titles Should be:	How?	Examples
Unique	Make sure the title is unique and avoid: • Overly specific or lengthy titles; • Words like 'the' or 'a' as they are not typically used in document searches; and • Abbreviations or acronyms that are not widely used or known across the University.	WHS Risk Assessment Manual Handling Library North Sydney V03 20180703.docx
Consistent	• Enter dates as YYYYMMDD; • Add document status (i.e. draft or final), or version numbers at the end of the title (especially WHSMS policies and procedures); • Restrict version numbers to two numbers e.g. V01; • Don't use brackets or forward slashes (can impact upon document searches); • If similar documents are stored in the same folder, the date should be entered as the first part of the title, followed by the location (if produced on multiple campuses e.g. 20190101 Canberra WHS Committee Minutes Final.pdf	SWMS Photocopiers OPSM 20190327 V09.pdf

Section 8 - Store Records within Authorised Business Systems

(14) It is recommended that electronic records and documents should be maintained within relevant (University) Authorised Business Systems. These systems will be regularly reviewed as the University makes ongoing determinations about effective storage systems, requirements associating with using these systems and allocates project resources to ensuring that Authorised Business Systems are adopted across ACU.

Table 4: Authorised Business Systems for WHSMS Records

System	Types of Records
HPE Content Manager (default system)	Mixed business records, including WHSMS
SharePoint Online	Mixed business records, including WHSMS
Banner	Student administration
Chemwatch	Chemical Registers and WHS risk assessments for hazardous chemicals
Leo	Student learning management, including laboratory WHS inductions.
Aurion	People and Capability and payroll, including injury management records
Orion	Research management
Riskware	Reporting and managing risks that are associated with hazards, near misses, incidents and injuries; and Managing non-conformances.
Comply Flow	Contractor administration, including licensing and registration
InPlace	Student placements, including recording Working with Children clearances

Note: Organisational units can request access to HPE Content Manager via Service Central.

Section 9 - Access Current Documents

Apply Version Control Practices within Work Areas

(15) WHSMS Records, including local protocols, and documents should be digitally stored and filed in a format that prevents unauthorised access and supports staff and others to access current version of relevant documents. Nominated Supervisors and Managers should engage staff about how to access current versions of the WHSMS policies, procedures, guidelines and forms.

Publish Hyperlinks to Access Current Versions of WHSMS Documents

(16) Staff should only access the current version of WHSMS policies, procedures and other tools from the intranet. Work areas should publish hyperlinks to support staff and others to access current versions of these documents.

(17) These documents are maintained electronically and only current versions of these documents, which are authorised by a Responsible Person, are published on the intranet. The majority of these documents are reviewed by People and Capability staff for currency at least every three years and other policies and procedures, outlined in Table 5, are reviewed more frequently. Older versions of these documents are archived within an Authorised Business System. MS Word versions of tools and forms are also available on the WHS&W website.

Table 5: Documents that are reviewed every six to twelve months

Document	Reviewed
Work, Health, Safety and Wellbeing Policy	Annually
WHS Register of Compliance Obligations	Every six months to ensure that it is current
WHSMS Implementation Procedure	Updated whenever the University implements new WHSMS processes, procedures and makes other changes to the framework
WHSMS Performance Measurement and Evaluation Procedure	Whenever the University broadens the scope of its reporting and the Key Performance Indicators that are used to measure the performance of the WHSMS.
WHSMS Records and Document Management Procedure	Whenever the University broadens its record keeping requirements or makes changes to its Authorised Business Systems.

Maintain External Records

(18) All externally generated records, such as administrative letters received from a WHS regulator and feedback about the WHSMS from interested parties (stakeholders), will be filed and controlled by People and Capability.

Section 10 - Manage Access and Preserve Confidentiality

(19) All data and information contained within WHSMS records should be compliant with Privacy legislation and the Privacy Policy.

(20) Sensitive information should only be collected whenever it is necessary for a specific purpose and consent should be obtained, unless there is a legal basis for obtaining these details.

(21) When personal information is collected, the relevant person should be advised about why and how this information will be used, the legal basis for this collection and any consequences of not obtaining this information.

(22) WHSMS records that contain private or confidential information should be identified within the relevant WHSMS Records Register. Electronic access to these records should be restricted to a small number of users who require access for legitimate business purposes. Some confidential records may also be placed in locked cabinets and other high quality storage devices. Confidential records should be stored in higher quality storage devices and superior handling practices should be applied.

(23) A Service Central request should be submitted whenever staff members, with restricted access to these records, require this information for legitimate reasons. Employment Relations and Safety staff will respond to these requests and determine whether they can release these records (and comply with privacy restrictions).

(24) Any local protocols for accessing these records should be communicated to staff and should also be available via local WHSMS Records Registers.

Section 11 - General Requirements, Including Disposal and Archiving Processes

(25) Records should be managed in alignment with the ACU Records and Archive Management Policy and other relevant University policies and procedures.

(26) Some of these requirements, include:

a. Only dispose of hard copy, confidential records in secure bins;
b. The timeframes associated with retaining and disposing of records should be informed by the ACU WHSMS Records Register (see WHSMS Records Register - Appendix A) and the Records Retention and Disposal Schedule; and
c. Nominated Supervisors and Managers ensure the scope of the WHSMS records maintained by their work areas are comprehensive and are accurately and efficiently maintained within their work area.

Section 12 - Revisions made to this Procedure

(27) The University may make changes to this Procedure from time to time to improve its effectiveness. If any staff member wishes to make any comments about this Procedure, they should forward their suggestions to People and Capability.

Section 13 - Further Assistance

(28) Any staff member who requires assistance in understanding this Procedure should first consult their Nominated Supervisor or Manager who is responsible for applying the University's WHSMS within their work area. Should further information or advice be required staff should visit Service Central.

Section 14 - Associated Information

(29) For related legislation, policies, procedures and guidelines and any supporting resources please refer to the Associated Information tab.

Status and Details

Status	Current
Effective Date	19th December 2023
Review Date	30th April 2024
Approval Authority	Vice-Chancellor and President
Approval Date	19th December 2023
Expiry Date	Not Applicable
Responsible Executive	Angelle Laurence Chief People Officer
Responsible Manager	Angelle Laurence Chief People Officer
Enquiries Contact	Bernardine Lynch ER and Safety Committees and Policy Officer People and Capability