

Procedure No: CS-DRM-01
TRIM Ref No: B/D/12/12861
Reviewed: 09/21
Amended: 09/21
Review Due: 09/23



CS ENERGY PROCEDURE

RETENTION AND DISPOSAL OF PHYSICAL RECORDS CS-DRM-01

Responsible Officer: Records Manager
Responsible Manager: Head of Legal, Investment and Regulation
Responsible Executive: Executive General Manager Corporate Services

DOCUMENT HISTORY

Key Changes	Prepared By	Checked By	Approved By	Date
Original Release	S Collard	R Freath	R Freath	13/12/2012
Reviewed – Update of format. No changes to content.	S Collard			29/05/2018
Reviewed – Update made to references	S Collard			15/04/2019
Reviewed – Update made to definitions	S Collard			03/03/2020
Reviewed – Update of format. No changes to content.	S Collard			27/09/2021

CONTENTS

DOCUMENT HISTORY	1
1 PURPOSE	3
2 SCOPE	3
2.1 What is a Business Record?	3
2.2 What is a Physical Record?	3
3 RESPONSIBILITIES AND ACCOUNTABILITIES	4
3.1 Chief Executive Officer (CEO)	4
3.2 Records Manager (Authorised Delegate)	4
3.3 Document Management Officer / Records Management Support Officer	4
3.4 Executive General Manager / Site Manager / In-House Legal	5
3.5 Head of Department / Manager / Supervisor	5
3.6 Employees, Contractors and Consultants	5
4 ACTIONS	5
4.1 How long should Business Records be kept?	5
4.2 Destruction Approval Requirements	6
4.3 Obtaining Destruction Approval	7
4.4 Undertaking Destruction of Records	7
4.4.1 Destruction Responsibilities.....	7
4.4.2 Destroying Physical Records.....	7
4.4.3 TRIM Virtual Archive Boxes.....	8
5 PROCESS FLOW – DISPOSAL REQUESTS	9
6 DEFINITIONS	10
7 REFERENCES	12
8 RECORDS MANAGEMENT	12

1 PURPOSE

The purpose of this procedure is to ensure that CS Energy records are legally retained and destroyed in accordance with legislative requirements and compliance with the Records Governance Policy. This procedure demonstrates the approval process for the retention and/or destruction of CS Energy physical and electronic records.

Under section 13 of the Public Records Act 2002, it is unlawful to dispose of a record without the authorisation of the State Archivist in the form of an approved Retention and Disposal Schedule which specifies the minimum period for which the records need to be retained.

2 SCOPE

This procedure applies to all physical business records (in all formats) created and received by CS Energy and subsidiary companies that form a history of the organisation's business activity. This includes all on-site or off-site archives as well as physical records stored locally within team areas. Records deemed to be of continuing value need to be identified and retained in a useable form for a minimum period as specified in an approved Retention and Disposal Schedule.

All CS Energy business records on any site must have final approval from the Records Manager for destruction whether they are physical records located in on-site or off-site storage.

2.1 What is a Business Record?

Business Records provide evidence of actions, approvals, decisions, processes, communications and correspondence and are the cornerstone of CS Energy accountability. It is not a Business Record if it does not contribute to CS Energy's business activities or decision-making processes. Business Records include drafts of final documents that were circulated internally or externally for comment or feedback.

2.1.1.1 Definition - Public Records Act 2002

Any recorded information created or received by an organisation in the course of their business or conduct of their affairs. A record provides evidence of activities. This is irrespective of the technology or medium used to generate, capture, manage, preserve and access those records.

2.1.1.2 Definition – Records Management Standard – AS ISO 15489.1:2017

Records are both evidence of business activity and information assets. Any set of information, regardless of its structure or form, can be managed as a record. This includes information in the form of a document, a collection of data or other types of digital or analogue information which are created, captured and managed in the course of business.

2.2 What is a Physical Record?

Physical Records can be found in a range of formats including, but not limited to –

- Diaries / Hand-written Notes
- Pen-signed Documents (e.g. – Contracts)
- Microfilm / Photographs
- Publications / Newsletters / Reports
- Diagrams / Maps / Plans / Drawings
- Videos / Audio / CDs / DVDs

3 RESPONSIBILITIES AND ACCOUNTABILITIES

3.1 Chief Executive Officer (CEO)

The Chief Executive Officer (CEO) has a responsibility under legislation to ensure that full and accurate records are made and kept of CS Energy business activities. In doing so, they will comply with policies, standards and guidelines issued by the State Archivist and ensure the maintenance of proper standards in the creation, keeping and management of records under their control.

The Chief Executive Officer is responsible for –

- Ensuring that this procedure is followed to prevent the unlawful disposal of CS Energy business records and that they are retained for the minimum periods in accordance with mandated Retention and Disposal Schedules.
- Ensuring that the authorised delegate (Records Manager) is supported in the implementation of this procedure.

3.2 Records Manager (Authorised Delegate)

As the authorised delegate, the Records Manager has a responsibility under legislation to ensure that full and accurate records are made and kept of CS Energy business activities. In doing so, they will comply with policies, standards and guidelines issued by the State Archivist and ensure the maintenance of proper standards in the creation, keeping and management of records across the organisation.

The Records Manager is responsible for –

- Ensuring that this procedure is in line with current legislative requirements in order to meet organisational compliance
- Ensuring that CS Energy business records are retained for the minimum periods in accordance with mandated Retention and Disposal Schedules.
- Managing and coordinating the legal disposal of CS Energy business records across all CS Energy sites
- Supporting document and records management staff to fulfil their responsibilities in relation to correct retention and disposal processes
- Providing advice in relation to retention and disposal of CS Energy business records to all CS Energy employees, contractors and consultants
- Approving the destruction of any CS Energy business records for all disposal requests

3.3 Document Management Officer / Records Management Support Officer

Document Management Officers, Records Management Support Officers or Library Officers have a responsibility under government legislation and the CS Energy Code of Conduct to assist and encourage staff at their site to maintain full and accurate records of CS Energy business activities. In doing so, they will comply with policies, procedures and guidelines issued by the Records Manager and assist in ensuring the maintenance of proper standards in the creation, keeping and management of records at their site.

Under the guidance of the Records Manager, they are responsible for –

- Ensuring that CS Energy business records are retained for the minimum periods in accordance with mandated Retention and Disposal Schedules.

- Ensuring that archive storage environments are secure and free of insects, rodents and dampness
- Carrying out regular audits of physical archive records and their retention time frames
- Processing disposal requests for physical archive records
- Carrying out disposal checks for submitted disposal requests
- Arranging appropriate signatures for submitted disposal requests
- Carrying out the legal disposal of CS Energy business records following approval

3.4 Executive General Manager / Site Manager / In-House Legal

Executive General Managers, Site Managers and In-House Legal have a responsibility under legislation and regulations to ensure that they actively encourage and support their division or site to keep full and accurate records of CS Energy business activities.

At Brisbane Office the Executive General Manager of the division responsible for the records or an In-House Legal representative may be requested to provide their endorsement to support the decision that the records are no longer required by the organisation for legal, financial, audit, historical or reference purposes.

At a Generation Site the Site Manager or an In-House Legal representative may be requested to provide their endorsement to support the decision that the records are no longer required by the organisation for legal, financial, audit, historical or reference purposes.

3.5 Head of Department / Manager / Supervisor

Heads of Departments, Managers or Supervisors have a responsibility to ensure that they actively encourage and support their team to keep full and accurate records of CS Energy business activities.

Heads of Departments, Managers or Supervisors often have historical knowledge of records that their division or team have been responsible for. It is for this reason that when a request for disposal is submitted they are asked to provide verification, that to the best of their knowledge, the records are no longer required by their team for legal, financial, audit, historical or reference purposes.

3.6 Employees, Contractors and Consultants

All employees (including contractors and consultants) have a responsibility under government legislation and the CS Energy Code of Conduct to ensure that they create and manage CS Energy records. This includes the retention and disposal of CS Energy business records in all formats in accordance with the Retention and Disposal Schedules.

4 ACTIONS

4.1 How long should Business Records be kept?

CS Energy is responsible for the management and retention of records that have continuing value to ensure that accountability, historical, cultural and business needs are met.

Business records must be retained and/or disposed of in accordance within Retention and Disposal Schedules approved by the State Archivist. CS Energy is responsible for complying with two Retention and Disposal Schedules. These are –

- ["B/D/09/15119"](#) - QDAN 249 - General Retention and Disposal Schedule

- ["B/D/09/15118"](#) - QDAN 618 - Energy Sector Retention and Disposal Schedule

Each Retention and Disposal Schedule deals with a specific set of records. Although there is a Retention and Disposal Schedule that relates to the energy sector, many of the more administrative types of records (e.g. – Finance, Human Resources, Organisational Governance, etc) are covered by the General Retention and Disposal Schedule.

Consider the following to determine retention requirements before disposal can be approved –

- Identify that the records have been retained for the minimum retention periods as listed in the Retention and Disposal Schedules.
- Identify if the records are printed duplicates used for reference purposes as these may be destroyed when no longer required.
- Identify if the records are required to be retained for any legal reason.
- Identify if the records are required to be retained under other legislation.
- Identify if the records are required to be retained because they are perceived as having significant historical or future research value.
- Identify if the records are vital records that are required to be retained to ensure that CS Energy can continue to operate in the event of a disaster. Vital records, for legal, regulatory or operational reasons, cannot be destroyed without impairing the organisation's ability to conduct business (e.g. – signed contracts, policies, procedures).
- Identify if the records are considered by the organisation to be of high-value or high-risk. These records must be retained for as long as the records remain categorised as such.
- Identify records that must be retained permanently as shown in the Retention and Disposal Schedules

There are some records that are covered by more than one retention period. In these cases, the longest retention period applies.

4.2 Destruction Approval Requirements

The destruction approval process is designed to ensure that we have evidence to show that records were not destroyed before minimum legal requirements and that other administrative, legal, financial and audit needs were considered. The process also provides the necessary documentation to support and provide evidence of appropriate destruction action. Destruction must NOT be carried out if there is a current outstanding action that relies on the records or that the records are likely to be required to use as evidence (e.g. legal freeze).

CS Energy has an approval request form that must be used to authorise the destruction of business records -

- [B/D/12/12615](#) – Form - S2019 - Approval Request for Disposal of Physical or Archive Records

Destruction of any records will be –

- Checked by a document and records management officer
- Verified by the appropriate Head of Department, Manager or Supervisor
- Endorsed if required by the appropriate Executive General Manager, Company Secretary, Site Manager or Legal representative
- Approved by the Records Manager for final disposal

Verification and Endorsement are carried out by teams, divisions and/or sites with appropriate business knowledge of the records. This is not an approval to destroy the records but a confirmation that they are no longer required by the business for legal, financial, audit, historical or reference purposes.

4.3 Obtaining Destruction Approval

To obtain approval from the Records Manager to destroy records, the following actions are required –

- Ensure that the records have satisfied the minimum retention requirements and are no longer required for administrative, legal, financial, audit, historical or reference purposes. Refer to CS Energy's Retention and Disposal Schedules for more confirmation of retention periods required.
- Complete Form S2019 and provide a list of the records to be approved for destruction.
- Obtain the required signatures to confirm that the records are no longer required for any business purpose and are approved for destruction.
- Update the Retention and Disposal Register for the relevant site or retain the completed approval form.

If approval is not given by the Records Manager, the records must be retained. Communication will be sent from the Records Manager to the relevant site Document Management Officer or Records Management Support Officer explaining why the records cannot be destroyed at that point in time or the reason why the record must never be destroyed.

4.4 Undertaking Destruction of Records

4.4.1 Destruction Responsibilities

Destroying any records must be done in a secure manner through the use of a locked security bin or shredder. Incineration may be used as long as it can be confirmed that the records have been completely destroyed. It is not appropriate to place records in recycling bins or waste bins. This is particularly important for confidential files and where organisational or personal information is recorded on the documents.

4.4.2 Destroying Physical Records

Once approval is received from the Records Manager, the records covered by the approval form can be destroyed, but the following actions are required –

- Destroy only those records covered by the approval
- Destroy records as soon as practical once approval is received.
- Records MUST be destroyed in a confidential manner
- Once the destruction is completed, identify the destruction method on the approval form (S2019) and complete the date that the records were destroyed
- Ensure that the completed and signed approval form is saved (scanned) into HP TRIM.
- Ensure that the approval forms are retained as they may be required to show evidence that the records were destroyed in accordance with approved Retention and Disposal Schedules and in line with business and legal requirements.

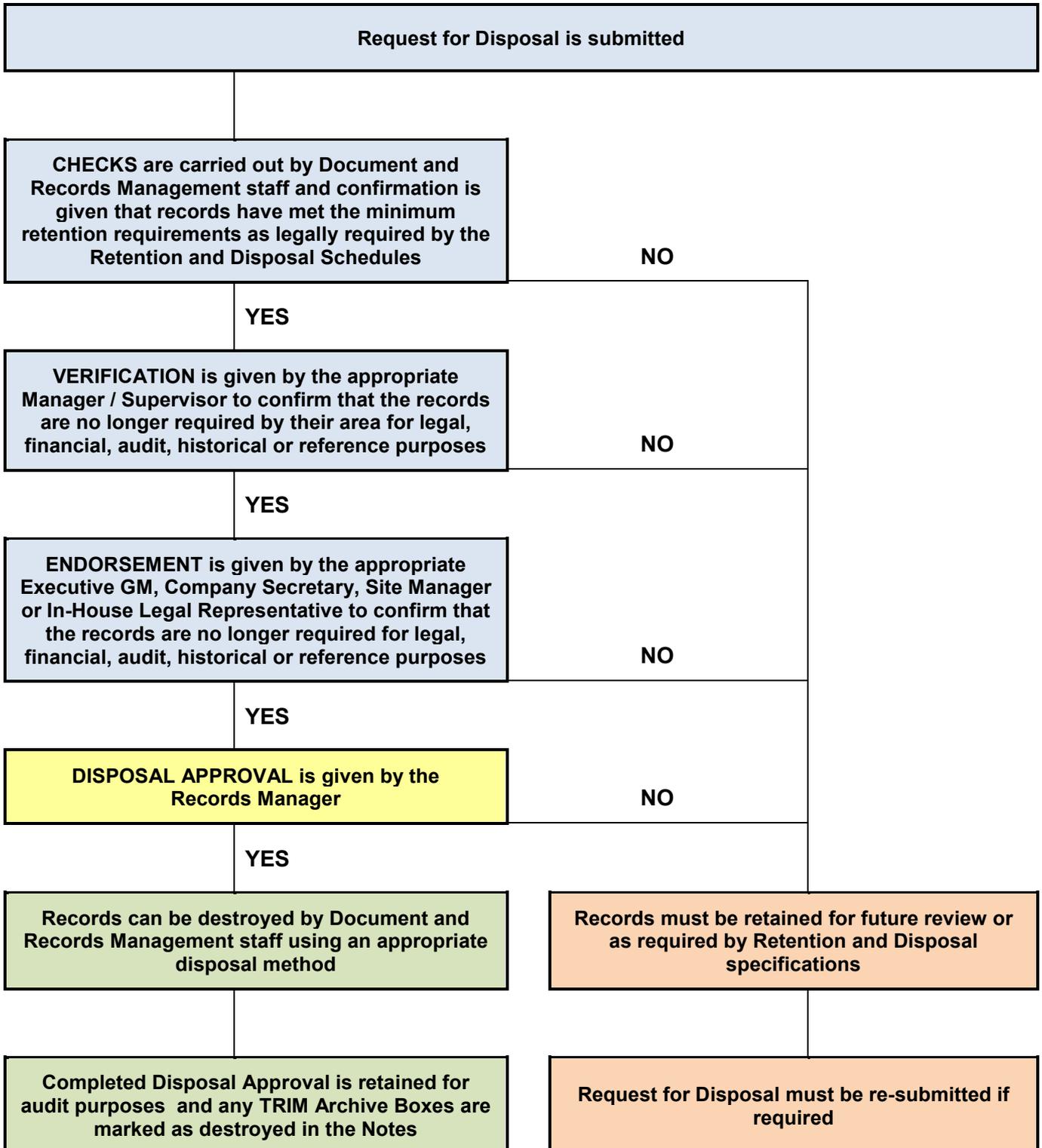
4.4.3 TRIM Virtual Archive Boxes

It is standard practice to create a TRIM Virtual Archive Box to reflect a physical Archive Box located on-site or off-site. This allows for easier searching of our stored physical records, who is responsible for the records, where the records are located, and management of their retention and future disposal.

When physical records have been destroyed Document and Records Management staff should apply a Note to the TRIM Archive Box with a User Stamp to confirm that the contents have been destroyed.

Business Classification Scheme (BCS)	X ARCHIVE BOX RECORDS - Lodgements 1998 to 2008 - Finance
Record Type	Archive Box (All Sites)
Record Number	BOX/12/611
Box Title (Contents in Notes)	NOS013 - Finance - Invoices and Bank Reconciliations
Creator	OLDHAM, Leonie
Date Created	7/12/2012 at 8:06 AM
Owner Location	FINANCE BRISBANE Staff (org)
Physical Storage Location	BRISBANE OFFICE CSE (org)
External Box Number (Offsite)	NOS013
Date Lodged / Stored	Thursday, 1 January 1998
Disposal Date (Per Schedule)	Monday, 1 August 2005
Notes	"Monday, 10 December 2012 at 10:34:29 AM (GMT+10:00) OLDHAM, Leonie (Brisbane):" CONTENTS DESTROYED
	NOS013 - Finance CS Energy – Invoices - August 1997 CS Energy – Invoices - September 1997 CS Energy – Payment Register – August to December 1997 CS Energy – Bank Reconciliations / Receipts – July 1997 CS Energy – Bank Reconciliations / Receipts – August 1997 CS Energy – Bank Reconciliations / Receipts - September 1997

5 PROCESS FLOW – DISPOSAL REQUESTS



6 DEFINITIONS

Term	Definition
Archives	The storage of records that are appropriately classified and arranged which satisfies the business and legal requirements associated with storage and retrieval of noncurrent information. Records may be kept in archives because they are required to be retained in accordance with mandated Retention and Disposal Schedules or are still required for legal, financial, audit, historical or reference purposes.
Appraisal	The process of evaluating records to determine which are to be retained as archives, which are to be kept for specified periods and which will be destroyed.
Business Record	A business record is any form of recorded information, either received or created, that is evidence of the organisation carrying out its legislative, administrative or other responsibilities. Formats can include paper-based or electronic records, including letters, minutes, memoranda, file notes, emails, web pages, maps, photographs, audio or video records and records generated within electronic business systems.
CMC	Crime and Misconduct Commission
Disposal	Any action that changes the circumstances of a record or removes a record from its usual setting. Disposal can include destruction, damage, alteration or transfer of custody or ownership of records.
eDRMs / eDMS	Electronic Document and Records Management System – a tool that manages and maintains electronic and paper records.
Ephemeral Records	Documents and records of short term temporary informational value that are no longer required for reference purposes or have been superseded by more current or accurate information. These may include duplicates of business records, supplier information, manuals and instructions, contact lists, non-business-related documents, etc
High Value Records	<p>Permanent Value: Records categorised as having permanent status under the legal retention and disposal schedules.</p> <p>Legal Value: Records categorised as being under a Legal Hold or Disposal Freeze in response to a direction from a Royal Commission inquiry, direction from the State Archivist or in relation to a Legal matter or investigation.</p> <p>Business Value: Records identified as having significant value to the business due to their ongoing legal, financial, audit, historical, technical or reference information.</p>
High Risk Records	High Risk records are the records that pose a significant risk to the agency, and its reputation, if they were misused, lost, damaged or deleted prematurely.
Inactive Records	Records that are no longer accessed in the normal course of business, but may have a requirement to be kept for a certain period by the organisation. No new documents can be added to an inactive record.
Off-site Storage	Separate facilities located outside of the organisation used for the storage of inactive hard copy records and managed by an independent organisation.
Physical Records	Physical records can include but are not limited to maps, plans, photographs, drawings, videos and paper documents.
QSA	Queensland State Archives
Record	An individual item of recorded information in any format, including data in computer systems, created, received or maintained by an organisation or individual in the transaction of business or the conduct of affairs, and kept as evidence of such activity. Records provide proof of the activities decisions and functions of the organisation, and their identity must be recorded in an approved records management system.

Term	Definition
Records Management	<p>Records Management is the governance of the records for the organisation (regardless of format). Unless records are managed efficiently, it is not possible to conduct business, to account for what has happened in the past or to make decisions about the future. Records Management when not managed correctly becomes a risk to the organisation. Records are a vital, corporate asset and are required to -</p> <ul style="list-style-type: none"> provide evidence of actions and decisions; support accountability and transparency; comply with legal and regulatory obligations; support decision making; and protect the interests of the organisation, staff and other stakeholders.
Retention and Disposal Schedule	<p>A document that mandates the legal minimum retention time frames before disposal of a record is permitted as approved by the Queensland State Archivist.</p>
Retention Period	<p>The minimum length of time that a Business Record must be kept for CS Energy's administrative, legal, financial, historical, audit or reference purposes.</p>
TRIM	<p>The EDRMS used by CS Energy, a software application that enables both physical (paper) and electronic record management.</p>
Vital Records	<p>Any record, regardless of format, containing information that is essential to the operations and / or survival of the organisation, necessary to re-establish the organisation's legal and financial responsibilities and necessary to preserve its rights and those of its stakeholders. Vital records include any records that are needed to operate the organisation during a disaster.</p> <p>See also – High Value Records / High Risk Records</p>

7 REFERENCES

Reference No	Reference Title	Author
2002	Public Records Act 2002	Qld Govt
2018	Records Governance Policy	Qld Govt
March 2012	Public Records Brief – Managing Public Records Responsibly	QSA / CMC
B/D/09/15119	QDAN 249 - General Retention and Disposal Schedule	QSA
B/D/09/15118	QDAN 618 - Energy Sector Retention and Disposal Schedule	QSA
B/D/11/39710	Code of Conduct - CS Energy	CS Energy
B/D/12/12615	Form - S2019 - Approval Request for Disposal of Physical / Archive Records	CS Energy
B/D/09/15089	Procedure - CS-DRM-02 - Archive Management - Physical Records	CS Energy

8 RECORDS MANAGEMENT

In order to maintain continual improvement, suitability, safety and effectiveness of the organisation, registered documents will be reviewed on a two-yearly basis or at intervals specified by legislative or regulatory requirements. Review of controlled documents should occur where it has been identified that there are changes in technology, legislation, standards, regulation or where experience identifies the need for alteration to the content. Registered documents should also be reviewed following an incident, change management process, modification or where directed as part of a risk assessment process. A 'review' can simply mean that it has been identified, confirmed and appropriately recorded that no changes are required and that the existing process remains the same.

Government Owned Corporations must ensure that records are retained according to accountability, legal, administrative, financial, commercial and operational requirements and expectations. In compliance with records retention and disposal, all documentation created in relation to business must be retained in line with minimum retention periods as detailed in legal retention and disposal schedules.