



Policy Hierarchy link	Work Health and Safety Act 2011 Work Health and Safety Regulation 2011 Work Health and Safety Policy UNSW Recordkeeping Policy		
Responsible Officer	Director, UNSW Safety and Sustainability		
Contact Officer	Manager, UNSW Health & Safety		
Superseded Documents	HS733 H&S Records Procedure V1.3		
File Number	2015/20434		
Associated Documents	HS734 Health and Safety Records Register UNSW Recordkeeping Policy Electronic Recordkeeping Policy Email Policy Website Policy School Records Disposal Guide Retention periods for records relating to research		
Version	Authorised by	Approval Date	Effective Date
1.4	Director, UNSW Safety and Sustainability	8 February 2016	8 February 2016

1. Purpose and Scope

The Health and Safety (H&S) Records Procedure outlines how UNSW will comply with its legal requirement under the Work Health and Safety Act and Regulation 2011 and the SafeWork NSW National Self Insurance Requirements

The University's primary policy in relation to recordkeeping, which outlines the essential requirements for recordkeeping at UNSW, is the [UNSW Recordkeeping Policy](#). UNSW's recordkeeping responsibilities are primarily defined by the [State Records Act and Regulation](#).

This procedure sets out the process for the management of H&S records to ensure that those records that are required to be kept by law, as well as any required by a University procedure, are identified and can be readily accessed.

This procedure applies to all records created under the UNSW Health and Safety Management System (HSMS).

2. Definitions

Recordkeeping: is the making and maintaining of complete, accurate and reliable evidence of business transactions in the form of recorded information. It is a critical function that is performed through the collective action of employees and systems throughout the organisation.

Record: Information created, received and maintained as evidence and information by an organisation or person, in pursuance of legal obligations or in the transaction of business. A record may be the final approved version of a document that captures decision-making and approval processes. Examples include completed risk management forms and safe work procedures, workplace inspections, induction records, training records, audit reports, H&S committee meeting minutes, health monitoring records, equipment maintenance records, evacuation reports, registers, emails.

Records Register: A register of all H&S records kept by the area, indicating the type of record, where it is kept, by whom, any privacy requirements and retention and disposal arrangements. The central H&S unit shall use TRIM as the Records Register.

TRIM: Total Records Information Management: The Corporate electronic records management system.

3. Procedure

The University's Recordkeeping Policy requires local areas to assign responsibilities for recordkeeping. H&S records need to be maintained in accordance with the [UNSW Recordkeeping Policy](#).

3.1 Identification of Records

(a) Central records

The H&S records that are required to be kept centrally under the University's H&S Management System are identified by the H&S Unit. All central H&S records are maintained and can be retrieved through the TRIM recordkeeping system detailing the record type, unique identifier, title, security, date created, creator, location, and revision number.

(b) Local records

TRIM is not currently available within all schools/units. Where it is not used, a local recordkeeping system and H&S Records Register may be used as an alternative.

The local H&S Records Register must detail the type of record, where it is located, who is responsible for its maintenance, any confidentiality issues, retention period and disposal method. The register may look like this: (refer to HS734 Health and Safety Records Register for full template)

Type of record	Where kept	By whom	Privacy requirements	Retention period	Disposal method
<i>Workplace inspections</i>	<i>Shared drive K</i>	<i>Administrator</i>	<i>None</i>	<i>7 years</i>	<i>Confidential waste</i>

A person must be assigned responsibility for the H&S Records Register (through position descriptions, the H&S responsibility matrix or other similar document) and ensure it is kept up-to-date.

A local H&S record would include a completed form e.g. an induction form or a completed risk management form, inspection checklist etc. i.e. evidence of activity that occurs in the local area.

Licenses that are required to be held under various legislation e.g. Radiation Users License or a Certificate of Competency to operate a forklift; are also examples of H&S records that must be maintained locally.

Once records are created and captured to any local system, they must be maintained in such a way that they cannot deteriorate, be damaged, lost or stolen.

3.2 Collection, indexing and filing

Hard-copy records should be filed using a method appropriate to their type and any security arrangements that might apply. Such methods could include sequential numbering, sorting by date etc. Electronically generated records should be assigned a unique identifier (e.g. SWP.004).

The order of filing should be such that retrieval of the record is easy and obvious. Any H&S record which could contain confidential information should be filed in a manner that prevents unauthorized access.

3.3 Storage, retention and maintenance of documents and records

The storage and maintenance of H&S records should be as outlined in the H&S Record Register i.e. detailing the location, responsible person etc.

TRIM electronic recordkeeping ensure records cannot deteriorate or be damaged. TRIM has secure access along with back-ups to ensure records cannot be lost or stolen. Local area record process must ensure that records are protected from damage or deterioration and secured to prevent loss or theft.

3.4 Access and confidentiality

Any records which contain confidential information must be noted on the H&S Records Register and stored in a secure area to which only authorized persons have access. A system should be established to handle any requests for access to such records and appropriate approvals sought and received in advance.

There must be a system that only authorized persons can access and/or release confidential records.

For central H&S records TRIM security levels shall be set by the Document Control Officer.

3.5 Disposal of documents and records

Hardcopy records (including signed forms) may be scanned to PDF and captured to a recordkeeping system. The source hardcopy record may then be destroyed, and the scanned PDF document becomes the 'original' record under the provisions of the State Records Authority NSW GA36, *Imaged Records*. The Records and Archives Office can provide further advice on this process.

Authorisation from the Records and Archives Office must be received before original H&S records are destroyed.

Most H&S records will have an ongoing role in terms of the operations and obligations of UNSW.

Before the disposal of any records their continuing use for legal or system evaluation purposes must be identified.

Refer to the UNSW Recordkeeping Policy and the Records and Archives Office for details on the disposal process.

4. Review & History

This procedure will be reviewed at the frequency outlined in the HSMS Review procedure. The authorisation and amendment history for this document must be listed in the following table. Refer to information about [Version Control](#) on the Policy website.

The UNSW Document and Records Control procedure (OHS311) has been superseded. In its place a separate Document Control procedure and an HS Records procedure (this document) has been created. The below table shows a history of the superseded Document and Records Control procedure.

Version	Date	Author	Approval	Sections modified	Details of amendments
1.0	01/01/2007	Lindsay O'Keefe	Director, Human Resources		New document developed by merging two procedures - Document Control and Record Control
1.1	25/06/2007	Lindsay	Director,	All sections	References to Records Administration

		O'Keefe	Human Resources	Added 4.11	replaced with Records & Archives. Privacy, confidentiality section added
1.2	09/08/2007	Lindsay O'Keefe	Director, Human Resources	Section 3.0, 4.3, 4.8, 4.9, 4.10, 4.11, 4.12, 5.1	Minor changes to Sections 3.0, 4.3 Section 4.8 added Sections 4.9, 4.10, 4.11, 4.12, 5.1 amended
1.3	13/12/2007	Lindsay O'Keefe	Director, Human Resources	Section 4.4	OHS records to be kept in local area
1.4	1/10/2008	Lindsay O'Keefe	Director, Human Resources	Section 4.3 and 4.4	Electronic versions permitted; Separation of local and corporate document control requirements
1.5	23/10/09	Adam Janssen	Director, Human Resources	Section 4	Update of procedure

The table below provides a history of this HS Records procedure.

Version	Authorised by	Approval Date	Effective Date	Sections modified
1.0	OHS Manager	10/12/2010	10/12/2010	The requirements for OHS recordkeeping have been separated out from the former Document and Records Control procedure
1.1	Director of Human Resources	24/04/2013	24/04/2013	Included reference to TRIM in sections 3.1, 3.4, 3.5 Updated Branding Logo in accordance with UNSW Branding Guidelines. Modified the document identifier from OHS to HS in accordance with WHS legislation review
1.2	Director, UNSW Safety and Sustainability	30 April 2014	30 April 2014	Reviewed for administrative updates
1.3	Director, UNSW Safety and Sustainability	27 June 2014	27 June 2014	Section 2; Section 3- 3.1; Section 3.5 updated regarding scanning of hardcopy records. Minor text addition in definition of "Record".
1.4	Director, UNSW Safety and Sustainability	8 February 2016	8 February 2016	Reference to HS734 Health and Safety Records Register. Add need for local area to protect records from damage or deterioration.

5. Acknowledgements

[State Records - Administrative Records \(GA28\), 2009](#)

[General Retention and Disposal Authority – University records, GDA23](#)

UNSW Records and Archives Office

APPENDIX 1

The tables includes retention period requirements from the State Records Act, the Work Health and Safety Act and Regulations and others workplace safety-related regulations. Where there are two requirements (both state records and WHS) the longer retention period is applied.

References beginning with GA or GDA are from the State Records Act.

Table 1. HSMS Records to be held centrally

Type of Records	Where Kept	By Whom?	Privacy required?	Retention period	Reference
Health & Safety management system					
H&S Management System policies, procedures, guidelines, protocols	TRIM	H&S Manager	No	75 years after the procedure is superseded	GA28 – 14.9.1
Records relating to development and review of policies and procedures, including <ul style="list-style-type: none"> • Research • Consultation records • Draft versions 	TRIM	H&S Manager	No	5 years after action completed	GA28 – 14.9.2
Records relating to the review of health and safety programs and services. Records include: <ul style="list-style-type: none"> • records setting review parameters • analyses of injury and illness data, hazard and incident reports, notifications and accident investigation outcomes to establish trends • measurements and reviews of performance against performance indicators 	TRIM	H&S Manager	No	Retain minimum of 5 years after action completed	GA28 – 14.12.1
Internal and external reports on health and safety programs and practices	TRIM	H&S Manager	No	7 years after action completed	GA28 – 14.10.1
Promotion of safe work practices e.g. notices, posters	TRIM	H&S Manager	No	Until ceases to be of administrative or reference use	GA28 – 14.5.1
Inspections and audits					
H&S Audit Reports internal or external, including <ul style="list-style-type: none"> • Minutes of meetings • Interview notes • Correspondence 	TRIM	H&S Manager	No	6 years after action completed	GA28 – 14.3.1

Type of Records	Where Kept	By Whom?	Privacy required?	Retention period	Reference
<ul style="list-style-type: none"> Draft reports Final reports Records of remedial action 					
Records relating to routinely conducted inspections of hazardous substances in the workplace to ensure or check compliance with regulations, standards etc for their management and use.	TRIM	H&S Manager	No	Retain minimum of 75 years after action completed	GA28 – 14.6.1
Records relating to audits of processes and systems to detect the presence of hazardous substances or conditions in buildings or land.	TRIM	H&S Manager	No	Retain minimum of 75 years after action completed	GA28 – 16.3.1
Records relating to inspections to determine whether asbestos or other hazardous substances are present in buildings or land.	TRIM	H&S Manager	No	Retain minimum of 75 years after action completed, or if property is sold transfer to new owner	GA28 – 16.16.1
Meetings					
University level 1 H&S Committee Meetings Minutes including: <ul style="list-style-type: none"> associated tabled reports H&S Plans/targets 	TRIM	H&S Manager	No	10 years	GA28 – 1.0.5
Radiation Safety Committee meetings and associated tabled documents including project approvals	TRIM	H&S Manager	No	20 years	GDA23 – 23.1.2
Biological Safety Committee meetings and associated tabled documents including project approvals	TRIM	H&S Manager	No	20 years	GDA23 – 23.1.4
Hazards / Incidents					
Hazard / Incident Reports including <ul style="list-style-type: none"> Incident report forms Notifications to SafeWork NSW (WorkCover) Investigation records 	TRIM myUNSW	H&S Manager	No	Serious injury – 75 years after action completed Death – 25 years after date of death or 7 years after action completed Other – 25 years after action completed Members of the public – 15 years after action completed	GA28 – 14.1.1 GA28 – 14.1.2 GA28 – 14.1.3 GA28 – 14.1.4
Register of injuries	myUNSW	H&S	No	75 years	GA28 – 14.1.6

Type of Records	Where Kept	By Whom?	Privacy required?	Retention period	Reference
Compliance with court orders or notices e.g. <ul style="list-style-type: none"> Provisional Improvement Notices Record of compliance with orders Records of reporting on compliance 	TRIM	Manager H&S Manager	No	10 years	GA28 – 14.4.6
Health monitoring					
Reports on air monitoring and health surveillance when risk assessment indicates it should be undertaken or long-term health effects are possible e.g. carcinogens, lead	TRIM	H&S Manager	No	30 years	GA28 – 14.13.4 And WHS Regulation S.50 and S.378
Individual medical examination reports (e.g. fitness for duty)	TRIM	HR Manager	Yes	7 years after employment ceases	GA28 – 14.5.5
Records relating to health surveillance of employees exposed or at risk of exposure to hazardous or carcinogenic substances or conditions, including asbestos or cytotoxins and lead. Records include: <ul style="list-style-type: none"> details of employee/s exposed to or at risk of exposure to hazardous or carcinogenic substances or conditions notifications to SafeWork NSW (WorkCover) by employer of intention to carry out work that involves the use of carcinogenic substances or lead risk work or other notifications as required reports of outcomes of medical examinations to determine exposure or monitor the effects of exposure on an ongoing basis copies of written statements to employees regarding exposure when they cease employment. 	TRIM	H&S Manager	Yes	Retain minimum of 75 years after action completed	GA28 - 14.4.3 and WHS Regulation S.378
Asbestos health monitoring records in relation to a worker carrying out work for the business or undertaking are kept as a confidential record			Yes	At least 40 years after the record is made.	WHS Regulation S.444
Calibration certificates for H&S monitoring	TRIM	H&S	No	Until equipment is disposed of	GA28 – 5.14.1

Type of Records	Where Kept	By Whom?	Privacy required?	Retention period	Reference
equipment held by the H&S Unit		Manager			
Training					
H&S Training Register	Administer Training database	Database maintained by IT department	No	75 years after last entry	GA28 – 14.4.4 and 18.11.9
Copies of individual qualifications, certificates of competency, statements of attainment etc where these relate to occupational health and safety training or are required by employees as part of employment conditions or to perform their duties.	TRIM	H&S Manager	No	Retain minimum of 75 years after date of birth or minimum of 7 years after employment ceases, whichever is longer	GA28 – 15.4.3
H&S training presentations and handouts	TRIM	H&S Manager	No	Until superseded	GA28 – 18.11.6
Facilities Management					
University Asbestos Register	Facilities Files	Facilities Department	No	75 years	GA28 – 14.4.4
Asbestos removal control plan	Facilities Files	Facilities Department	No	75 years	GA28 – 16.16.6 and WHS Regulation S.465
Records of asbestos training	Facilities Files	Facilities Department	No	While the worker is carrying out the work, and for 5 years after the day the worker ceases working for the person.	WHS Regulation S.445
An asbestos removal license or asbestos assessor license	Facilities Files	Facilities Department	No	Takes effect on the day it is granted and, unless cancelled earlier, expires 5 years after that day.	WHS Regulation S.503
Records related to contractors involved in construction / maintenance	Facilities Files	Facilities Department	No	7 years	GA28 – 4.0.1

Type of Records	Where Kept	By Whom?	Privacy required?	Retention period	Reference
Construction WHS management plan	Facilities Files	Facilities Department	No	Until the project is completed, or if a notifiable incident occurs for at least 2 years after the incident	WHS Regulation S.313
Safe Work Method Statements for high risk construction work	Facilities Files	Facilities Department	No	If a notifiable incident occurs keep the statement for at least 2 years after the incident	WHS Regulation S.303
Underground essential services information (used prior to excavation work)	Facilities Files	Facilities Department	No	Until the excavation work is completed, or if a notifiable incident occurs for at least 2 years after the incident	WHS Regulation S.304
Plant registration records (if applicable) including Pressure Vessels	Facilities Files	Facilities Department	No	Retain minimum of 7 years after license, permit or certificate of registration expires or is terminated	GA28 - 5.7.2
Test Reports for Pressure Vessels	Facilities Files	Facilities Department	No	Until plant disposed of	
Residual current device testing (other than any testing conducted daily)	Facilities Files	Facilities Department	No	Until the earlier of the following occurs: (a) the device is next tested, (b) the device is permanently removed from use.	WHS Regulation S.165
Presence-sensing safeguarding system maintenance records	Facilities Files	Facilities Department	No	5 years or for the life of the plant, if it is registered plant	WHS Regulation S.226

Table 2: HSMS Records to be kept locally in the H&S Register

Type of Records	Where Kept	By Whom?	Privacy required?	Retention period	Reference
H&S Committee					
Local H&S committee meetings minutes and associated reports, correspondence			No	10 years	GA28 – 1.0.5
H&S committee workplace inspections			No	7 years	GA28 – 14.6.2
Records relating to election of representatives e.g. ballot papers, nominations			No	2 years after election is finalised	GA28 – 14.11.1
Risk management					
Risk assessments and Safe Work Procedures See biological and radiation sections for project approvals document retention			No	5 years - Where severity of risk is minimal/low 30 years – Where severity is low but health surveillance is needed 75 years – Where severity is high and/or health surveillance is needed	GA28 – 14.13.3 GA28 – 14.13.2 GA28 – 14.13.1
Local area risk register			No	Maintain whilst work unit is in operation	
Documentation related to reviews of Risk Assessments and Safe Work Procedures			No	5 years	GA28 – 14.9.3
Records related to communication of SWP and competency assessment			No	Until ceases to be of administrative or reference use	GA28 – 14.5.1
Chemicals					
Chemical Register			No	75 years	GA28 – 14.4.4

Type of Records	Where Kept	By Whom?	Privacy required?	Retention period	Reference
Safety Data Sheets (Chem Alert)			No	Until material is disposed of	GA28 – 14.5.2
Chemical waste disposal forms			No	30 years	GA28 - 16.16.7
Details for workers working with Schedule 10 carcinogens and each authorization			No	30 years after the authorisation ends	WHS Regulation S.388
Schedule 8 drugs register			No	2 years from last date of entry	Poisons & Therapeutic Goods Regulations
Radiation					
Radiation committee inspections			No	75 years	GA28 – 14.6.1
Registers for radiation apparatus and Unsealed sources			No	2 Years beyond the life of the Equipment	
Radiation dosimetry records			No	30 years	GA28 – 14.13.4
Records related to the use of lasers including project approvals, risk assessments, eye tests			No	30 years	GA28 – 14.13.2
Radiation waste disposal forms			No	99 years	GDA23 – 7.7.3

Type of Records	Where Kept	By Whom?	Privacy required?	Retention period	Reference
Radiation area and personal monitoring reports			No	30 years	
Calibration records for radiation monitoring equipment (fixed and personal)			No	2 years	GA28 – 5.14.2
Biosafety					
Biosafety committee inspections			No	75years	GA28 – 14.6.1
Biological organisms register			No	75 years	GA28 – 14.4.4
Record of vaccination / Staff decline of vaccination;			Yes	30 years or 7 years after employment ceases	GA28 – 14.5.5
Biological waste disposal forms			No	20 years	GDA23 – 7.7.2
Plant and Equipment					
Plant and equipment register			No	For the life of the plant	GA28 – 5.14.1
Commissioning, testing, repairs, inspection and maintenance records for plant and equipment that are relevant to controlled the risk associated with use or operation, including logbooks, test results or reports			No	Until the plant or equipment is disposed of	GA28 – 5.14.1 and WHS Regulation S. 237
Records /Reports of Electrical Testing and Tagging			No	7 years	GA28 – 14.6.2

Type of Records	Where Kept	By Whom?	Privacy required?	Retention period	Reference
Records relating to the organisation's compliance with mandatory or optional standards or with statutory requirements regarding the management or use of equipment and stores			No	7 years after action completed	16.16.8
Induction and Training					
Local training needs analysis and training register			No	7 years	GA28 – 14.5.4
Qualifications, skills, competency, certifications			No	7 years	GA28 – 14.5.1
Training records including training needs analysis, attendance forms, evidence of competency as required			No	7 years	GA28 – 14.5.5
Induction training records			No	7 years after employment finishes	GA28 – 14.5.5
Purchasing					
Purchase order forms detailing H&S specifications / requirements			No	Retain until purchased item is disposed of entirely	Normal Administrative Practice
First Aid and Emergency Information					
Records of first aid treatment e.g. first aid register, first aid treatment forms			No	5 years after last entry	GA28 – 14.1.5
Emergency evacuation plans			No	5 years after plan superseded	GA28 – 14.7.1

Type of Records	Where Kept	By Whom?	Privacy required?	Retention period	Reference
Records relating to nomination, appointment, resignation and termination of first aid officers and fire wardens e.g. letter of appointment, roles and responsibilities			No	1 year after appointment lapses	GA28 – 14.11.2
Debriefing reports of trial evacuations			No	5years	GA28 – 14.7.2
Training records for emergency personnel e.g. first aid officers, fire wardens			No	7 years after employment ceases	GA28 – 14.5.5
Records related to the inspection, testing and maintenance of equipment required for emergency purposes			No	7 years	WHS Regulation S.359 = latest result or until next test due
Diving					
Certificate for medical fitness for diving			Yes	At least 1 year after the work is carried out	WHS Regulation S.170
Record of diving competence			No	At least 1 year after the diving work is carried out	WHS Regulation S.175
Dive safety log			No	At least 1 year after the last entry is made.	WHS Regulation S.181
Diving plan or dive assessment			No	If a notifiable incident occurs in connection to the dive, keep for at least 2 years after the incident.	WHS Regulation S.182
Other					
Licensing or registration for work involving hazardous substances e.g. AQIS permit			No	75 years after action completed	GA28 – 14.4.1

Type of Records	Where Kept	By Whom?	Privacy required?	Retention period	Reference
Licensing or registration for work not involving hazardous substances			No	7 years after permit/license/registration expires or is terminated	GA28 – 14.4.2
Information sheets etc detailing hazards associated with materials for reference or instruction			No	Until material is disposed of	GA28 – 14.5.2
Information, instruction and training relating to confined space			No	7 years	GA28 – 14.5.5
Confined space entry permit			No	One month after return of confined space to service or If a notifiable incident occurs in connection with the work for at least 2 years after the incident.	GA28 – 14.4.5 and WHS Regulations S.77
High risk work license			No	At least 1 year after the high risk work is carried out or after the last occasion the worker performs supervision of high-risk work	WHS Regulation S.85
Work on energised electrical equipment assessment or statement			No	If a notifiable incident occurs in connection with the work keep the assessment or statement for at least 2 years after the incident	WHS Regulation S.162