



Corporate Governance

General Records Management Policy

Why We Keep Records

Warwick Benevolent Society Inc trading as Akooramak Care of the Older Persons is required to keep certain records in accordance with its legal and contractual obligations. Records may be required to be kept for the organisation's administrative purposes.

There are various legislative regimes in Australia which prescribe specific timeframes for document and record retention and destruction.

This Policy addresses the legal requirements which apply to the records of consumers and the organisation.

This Policy does not address legal requirements which apply to personal information, covered by the Privacy Act 1988 (Cth). For more information on how Warwick Benevolent Society Inc trading as Akooramak Care of the Older Persons collects, stores and disposes of personal information, refer to our [Privacy Program](#).

Warwick Benevolent Society Inc trading as Akooramak Care of the Older Persons needs to balance its requirements to retain documents in accordance with applicable legal requirements and destroy them when they are no longer required for any legitimate business purpose.

This Policy identifies the minimum amount of time for which Warwick Benevolent Society Inc trading as Akooramak Care of the Older Persons is legally required to retain its records.

Our Policy

Warwick Benevolent Society Inc trading as Akooramak Care of the Older Persons is committed to ensuring that all records are managed in an efficient, systematic and transparent way.

It is our policy that records are:

- kept up to date
- indexed in a logical manner that facilitates easy location, retrieval and association of related information
- preserved in a suitable physical or digital environment that ensures records are not subject to degradation, loss, alteration or corruption
- kept for the minimum required retention period.

Retention of Records

Warwick Benevolent Society Inc trading as Akooramak Care of the Older Persons is required to comply with section 154 of the Aged Care Act 2024 (Cth) (the Act), in relation to keeping and retaining records relating to its services. Section 154(a) of the Act refers to the Aged Care Rules 2025 (Cth) (made under Part 10 of the Act) as also outlining the obligations of registered providers in relation to record keeping.

Chapter 4, Part 7 of the Aged Care Rules 2025 (Cth) prescribes the kinds of records Warwick Benevolent Society Inc trading as Akooramak Care of the Older Persons must keep.

Warwick Benevolent Society Inc trading as Akooramak Care of the Older Persons is required to retain the following kinds of records:

Kind of Record	Specific Records that Must be Provided to Individuals and Retained by Warwick Benevolent Society Inc trading as Akooramak Care of the Older Persons
Consumers	Any record that enables claims for payments of subsidy to be verified, which may include: <ul style="list-style-type: none">• assessments of consumers

- service agreements
- clear and understandable invoices
- individual care plans for consumers, including Advance Care Directives and Plans
- a copy of the Aged Care Code of Conduct that we provide to consumers
- an explanation of how we protect consumer information
- an explanation of our complaints mechanisms
- information about when a consumer may be asked to leave Warwick Benevolent Society Inc trading as Akooramak Care of the Older Persons
- information about any relevant policies or protocols
- medical records, medication documentation including vaccination administration records, progress notes and other clinical records of consumers
- records relating to consumers' entry, admission, transfers (e.g. hospital), discharge and leave arrangements, including death certificates where appropriate
- up-to-date records of:
 - the name and contact details of at least one supporter of each consumer, according to information given to Warwick Benevolent Society Inc trading as Akooramak Care of the Older Persons by the consumer or by the supporter; and
 - the name and contact details of any other supporter of a consumer, according to information given Warwick Benevolent Society Inc trading as Akooramak Care of the Older Persons by the consumer or by the supporter
- Powers of Attorney and Enduring Guardianship agreements
- evidence of the organisation meeting its obligations under Chapter 3 of the Aged Care Act. This includes responsibilities related to:
 - quality of care and life for consumers
 - consumer rights
 - Consumer Agreements

	<ul style="list-style-type: none">• Aged Care Code of Conduct• protection of personal information• alleged and suspected assaults.• records relating to infection control including consumer immunisation records, mandated reports and infectious outbreak incidents• incident records and management including mandated reporting and records (e.g. SIRS)• quality indicator data• a record that a copy of the Statement of Rights has been given to each consumer.
Consumer Accounts	<ul style="list-style-type: none">• schedules of fees and charges (including retention amounts relating to accommodation bonds) for previous and current consumers• agreements between consumers and Warwick Benevolent Society Inc trading as Akooramak Care of the Older Persons• accounts of consumers• records relating to a determination that a consumer is a consumer with financial hardship• records relating to the payment and repayment of refundable deposits, accommodation bonds and entry contribution• information about the management and use of refundable deposits, including:<ul style="list-style-type: none">• information about the permitted uses of refundable deposits• Warwick Benevolent Society Inc trading as Akooramak Care of the Older Persons compliance with the Financial and Prudential Standards• whether we have failed to refund a deposit in the past year• the investment objectives as recorded in our Investment Management Strategy• a recent statement of audited accounts• a copy of the refundable deposit register entry for the consumer• records of the amount of daily accommodation payments, daily accommodation contribution and accommodation charge paid or

	<p>payable to Warwick Benevolent Society Inc trading as Akooramak Care of the Older Persons by consumers</p> <ul style="list-style-type: none"> • records of the amount of accommodation charge refunded by Warwick Benevolent Society Inc trading as Akooramak Care of the Older Persons in relation to consumers who paid an accommodation charge for a period during which they were charge exempt residents • in relation to a continuing consumer to whom the organisation starts to provide residential care after 1 July 2014—a record of whether the consumer made a written choice to be covered by a pre-2014 bond-related accommodation agreement in relation to the service
<p>Incidents</p>	<p>Warwick Benevolent Society Inc trading as Akooramak Care of the Older Persons records details in relation to each incident (actual, alleged or suspected), irrespective of whether external reporting is required. For more information on what information is recorded, refer to Record Keeping, in the Incident Management Policy.</p>
<p>Warwick Benevolent Society Inc trading as Akooramak Care of the Older Persons</p>	<ul style="list-style-type: none"> • records relating to Warwick Benevolent Society Inc trading as Akooramak Care of the Older Persons meeting prudential standards and requirements • records that enable: <ul style="list-style-type: none"> • claims for payments of subsidy to be properly verified; failure to comply with this requirement is an offence • proper assessment to be made of whether Warwick Benevolent Society Inc trading as Akooramak Care of the Older Persons has complied, or is complying, with its responsibilities under the Act. • records about whether Warwick Benevolent Society Inc trading as Akooramak Care of the Older Persons meets the requirements for the governing body relating to independent non-executive members and clinical care experience • records relating to each responsible person of Warwick Benevolent Society Inc trading as Akooramak Care of the Older Persons, including: <ul style="list-style-type: none"> • name, date of birth and address

	<ul style="list-style-type: none">• evidence of their clearance to work in aged care and any supervision arrangements in place
Staff	<ul style="list-style-type: none">• records that enable Warwick Benevolent Society Inc trading as Akooramak Care of the Older Persons to demonstrate that:<ul style="list-style-type: none">• in accordance with Chapter 4, Part 6, Division 1 of the Aged Care Rules 2025 (Cth), there is for each person who is a staff member, volunteer or responsible person: a police certificate that is not more than 3 years old OR an NDIS worker screening clearance that is in force• for any period that a staff member or volunteer is allowed under Chapter 4, Part 6, Division 1 of the Aged Care Rules 2025 (Cth) to be without such a certificate or clearance, an application for a certificate or clearance has been made, the staff member or volunteer will be supervised and they have made a statutory declaration that they have not been convicted of certain offences• any statutory declaration required to be made by a staff member or volunteer under Chapter 4, Part 6, Division 1 of the Aged Care Rules 2025 (Cth) has in fact been made.• human resources records including, but not limited to, records relating to:<ul style="list-style-type: none">• recruitment and selection, including position description/s and reference checks• records about the roles of aged care workers, including:<ul style="list-style-type: none">• title or other identifier for the role• normal duties of the role• our assessment of whether the role is a risk assessed role for the purposes of the Aged Care Act 2024 (Cth), the date on which the assessment was made, the name and title of the person who made the assessment and the reasons why the role was consider a risk assessed role• which aged care workers were engaged in risk assessed roles each day• registration documentation, including for current period, for Enrolled and Registered Nurses and allied health professionals

	<ul style="list-style-type: none"> • the credentials, expertise and experience of all care workers, external contractors, and records of contractor engagement • training and assessment records • performance management • leave records including applications and approved leave information <ul style="list-style-type: none"> • records about how the governing body of Warwick Benevolent Society Inc trading as Akooramak Care of the Older Persons has ensured that the staff members of Warwick Benevolent Society Inc trading as Akooramak Care of the Older Persons: <ul style="list-style-type: none"> • have appropriate qualifications, skills or experience to provide aged care and related services • are given opportunities to develop their capability to provide that care or those services. <p>Any police certificate or NDIS or Aged Care worker clearance, or copy thereof, that is kept as a record must be kept in accordance with the Privacy Act 1988 (Cth).</p>
<p>Services Staff Vaccinations</p>	<ul style="list-style-type: none"> • records of the number of service staff that receive an influenza vaccination each calendar year (whether or not under Akooramak Care of Older Persons influenza vaccination scheme) • records of COVID-19 vaccination of consumers and workers, including volunteers and contractors.
<p>Gender Equality and Diversity</p>	<ul style="list-style-type: none"> • workforce data disaggregated by gender • remuneration data by gender and role • recruitment, promotion, and separation data by gender • flexible work and parental leave utilisation by gender • employee consultation outcomes on gender equality • gender equality action plans and progress reports • board gender composition records • gender pay gap analysis reports • sexual harassment and discrimination complaint records.

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Record Retention

Note: there are current records retention notice on records relating to the Royal Commission into Aged Care Quality and Safety, for providers that have been issued a records retention notice on 27 November 2018.

Warwick Benevolent Society Inc trading as Akooramak Care of the Older Persons keeps the records listed above for the period of seven (7) years after the date the record was made, as required under Chapter 4, Part 7, Division 1 of the Aged Care Act 2024 (Cth).

Records relating to a consumer are maintained in accordance with this Policy, even after Warwick Benevolent Society Inc trading as Akooramak Care of the Older Persons ceases to provide care to that consumer. Additionally, should Warwick Benevolent Society Inc trading as Akooramak Care of the Older Persons cease to be a registered provider of aged care, all records listed in the above table are maintained for the period ending seven years after the record was made, as required under section 543 of the Act. This does not include records that Warwick Benevolent Society Inc trading as Akooramak Care of the Older Persons is required to transfer to another registered provider under section 149-80 of the Rules.

Failure to comply with these obligations could result in a sanction being imposed on Warwick Benevolent Society Inc trading as Akooramak Care of the Older Persons.

Legal Proceedings

Warwick Benevolent Society Inc trading as Akooramak Care of the Older Persons acknowledges that it is an offence to destroy or interfere with any document that is reasonably likely to be required in evidence in a legal proceeding.

“Reasonably likely” is not a defined expression. Each category of record needs to be assessed individually. However, as an example, documents that record reportable assaults at the organisation should be retained, as it is reasonably likely that these records will be required either for investigatory or legal proceedings.

Destruction also includes rendering illegible, making undecipherable or otherwise making incapable of identification.

How We Keep Records

Warwick Benevolent Society Inc trading as Akooramak Care of the Older Persons has a range of resources available to it for for the management of records. These include:

- digital storage facilities for electronic records; and/or
- physical storage facilities for paper/print records.

Digital storage is the preferred format for record storage and retrieval. The following records must be stored electronically:

Insert List of Digitised Records

For all other records, it is our policy that if the records are in hard copy, those records will transition from hard copy to digital format in accordance with a transition plan.

This Policy does not differentiate between the period of retention required for paper/print records and digital records.

Where We Keep Records

Access to Records

Consumer care records should be available at the point of care or service delivery. Consumer care records must not be removed from the organisation unless prior arrangements have been made with the Heads of Department, for example when required under a subpoena or for the review of the consumer by a specialist medical practitioner. If consumer care records are removed from the organisation outside of these circumstances, it must be reported in accordance with our Incident Management procedures.

Destruction of Records

When the minimum legislative period for record retention has expired for a particular record, any copies that have been archived or held as back-ups will be destroyed or the personal information de-identified. Personal information that has been de-identified is no longer personal information.

Only the Heads of Department can authorise the destruction of Warwick Benevolent Society Inc trading as Akooramak Care of the Older Persons records. Inappropriate or premature destruction of records may have ramifications for Warwick Benevolent Society Inc trading as Akooramak Care of the Older Persons in any future legal proceedings or official inquiries, including the imposition of sanctions on the organisation's operations.

Implementation

Staff training and professional development ensures all staff, in line with their roles and allocated responsibilities, are able to create, organise, store, retrieve, share, preserve or destroy information and data in accordance with organisational policies and procedures.

Warwick Benevolent Society Inc trading as Akooramak Care of the Older Persons ensures it is able to manage information and data and investigates ways to improve their management in supporting organisation wide strategies.

References and Resources

Aged Care Act 2024 (Cth)

Aged Care Rules 2025 (Cth)

National Archives of Australia (2025) [Information management and data capabilities | naa.gov.au](https://naa.gov.au)