newgen



SOLUTION FOR SUPERANNUATION RECORDS MANAGEMENT

Compliant, Governed Records Management for APRA-Regulated Super Funds

Purpose-built for the SIS & Corporations Act and APRA Prudential standard CPS 230: Not a generic ECM platform adapted for superannuation.

Trustees are personally liable under the **SIS Act and Corporations Act** for the records their fund maintains. **APRA Prudential standard CPS 230**, in force from 1 July 2025, requires audit ready governance of critical operations. The reformed **Privacy Act 1988** adds parallel obligations around how personal and Tax File Number data is held, accessed, and disposed of. **NewgenONE** provides the purpose-built records layer that makes all of those obligations defensible, from first capture through to compliant disposal.

Why It Matters?

Three Risks Trustees Cannot Afford to Ignore

ASIC Enforcement: Records Failures Have Consequences

ASIC's actions against some of the Super Funds were directly linked to inaccessible death benefit nominations (Binding Death Benefit Nominations) and claims documentation. Trustees at other funds should treat this as a direct signal of what regulators will examine next..

PII and TFN Governance: A Parallel Obligation to SIS Act Compliance

Super funds hold the most sensitive personal data in Australia: Tax File Numbers, banking details, health records from insurance claims, and beneficiary information. Under the reformed Privacy Act 1988, penalties for serious breaches reach $50 million. TFN misuse or unauthorised disclosure carries criminal penalties under the SIS Act. Funds must demonstrate that access to this data is restricted, logged, and auditable and that records are disposed of when the authorised retention period expires.

Two Notification Clocks: 72 Hours and 30 Days

APRA Prudential Standard CPS 230 requires notification of significant operational risk incidents within 72 hours. The Privacy Act Notifiable Data Breach scheme requires OAIC notification within 30 days of becoming aware of a likely serious harm breach. Without a purpose-built records system, assembling tamper-proof evidence of what happened, what records were affected, and who had access is practically impossible within either window.

The Solution:
NewgenONE Records Management System

What It Does?

Capture & Ingest

- Automated ingestion from email, portal, administrator platform, scan, and API
- AI-driven classification, SIS Act and Corporations Act document types pre-configured at deployment
- TFN-tagged and PII-sensitive document detection at ingestion with automatic access restriction
- Bulk SFT legacy migration metadata normalisation and retention policy inheritance
- Death Benefit nomination and claims document capture with direct case linkage

Govern & Control

- SIS Act and Corporations Act retention schedules enforced automatically - 7-year and 10-year classes pre-built
- Role-based access with tamper-proof audit trail - CPS 230 and Privacy act compliant
- APRA-grade version control and document lifecycle management
- Automated de-identification or disposal of PII at end of authorised retention period
- TFN access controls - staff can only access TFN records for authorised processing purposes, with full access logging

Retrieve & Report

- Sub-second search by member, date, document type, or case across millions of records
- 72-hour APRA CPS 230 incident response - complete evidence packages assembled automatically
- AFCA dispute pack auto-assembly statements, correspondence, decisions, claims records
- Privacy Act NDB-readiness - breach impact records and access logs assembled within the 30-day OAIC notification window
- APRA Connect-ready regulatory submission evidence packages

The Shift to Governed Records Management

Current State: Most Funds Today		NewgenONE Records Management
01 SharePoint or administrator platforms used as default records store - no enforced retention or disposal	VS	01 Purpose-built governance layer- SIS Act and Corporations Act retention enforced, full record lifecycle managed
02 TFN and PII records accessible to any staff member with SharePoint access - no audit trail of who viewed what		02 TFN access restricted to authorised processing purposes only, every access logged with full audit trail
03 PII retained indefinitely with no automated de-identification or disposal at end of retention period		03 Automated de-identification or secure disposal of PII when authorised retention period expires, Privacy Act compliant
04 Binding Death Benefit Nominations and claims records inaccessible across processing teams		04 Unified death benefit nomination and claims repository - tamper-proof, case-linked, instantly retrievable
05 Post-SFT document estates unreconciled, multiple legacy retention policies		05 Automated SFT migration with retention policy inheritance and metadata normalisation
06 Trustee board minutes in SharePoint with no enforced retention		06 10-year retention automatically enforced, legally defensible under SIS Act s.103 and Corporations Act s.180–184

Works With What You Have

Complements Microsoft 365, SharePoint, and Your Administration Platform

NewgenONE Records Management does not replace SharePoint for collaboration, it provides the CPS 230-grade and Privacy Act-grade governance layer that SharePoint cannot deliver for regulated trustee obligations. It co-exists with your administrator's platform (MUFG, Bravura, Grow Inc, SS&C, FNZ, Apex/Acurity) as the fund-owned system of record for compliance-critical content. Documents and records meeting SIS Act or Corporations Act retention triggers are automatically promoted from SharePoint to OmniDocs — with access controls applied at ingest based on PII sensitivity and TFN classification.

Native integration with **NewgenONE Intelligent Process Automation** and **Omnichannel Customer Communication** enables death benefit case management, contribution exception workflows, and member communication archiving to operate seamlessly on a unified platform. The result is a single audit trail, consistent governance, and streamlined vendor management through one trusted provider.

Why NewgenONE

The ANZ Superannuation Advantage

The only ANZ super platform that natively combines records governance, process automation, and member communications, one audit trail for APRA CPS 230 and OAIC simultaneously

Integrated BPM + CCM + Records Management

Dedicated migration tooling for bulk document import, retention policy inheritance, and metadata normalisation across predecessor fund estates.

Post-merger and SFT ready

Compliance-grade records management at a TCO accessible to funds of all sizes

Mid-market pricing

About Newgen

Newgen Software Orchestrates Intelligent Enterprises at scale. The NewgenONE Platform unifies content, processes, and communications into an orchestration layer where intelligence is embedded into how enterprises operate, with trust, governance, and control built in. Enterprises move beyond fragmented initiatives to continuously adaptive, production-ready operations. Decisions, workflows, and experiences evolve in real time, shaped by context, data, and embedded AI. Trusted by leading organizations worldwide, Newgen defines how modern enterprises operate, intelligently and at scale

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