

## Table of commentary: Standard on the physical storage of State records

In 2018 NSW State Archives and Records reviewed the *Standard on physical storage of State records* (Standard No. 11, issued 2012). We had already undertaken some review work in 2016 and a feedback survey with public offices in 2017.

The *State Records Act 1998* requires NSW State Archives and Records to consult with public offices on any proposed standard (section 13(3)).

The revised draft *Standard on physical storage of State records* was released for consultation on our website on 12 October 2018. Over the course of a four week consultation, we received 17 submissions from public offices. No submissions rejected the proposed standard, and many were positive in their endorsement and support for the proposed standard and its requirements:

- ‘...support the draft storage standard based on legislative requirement and rationale provided by State Archives and Records Authority of New South Wales.’
- ‘... support the revised standard where there appears to have been effort to streamline components, with principles reduced from seven to six. Amending the format for the way minimum compliance requirements are presented, along with examples of how these can be achieved ... will assist with identifying and managing requirements and any associated risks.’
- ‘...the document was well written and laid out in a format that is easy to read and digest.’
- ‘... found the draft standard useful for understanding the physical storage of State records as a core component of government business. Our organisation feel the draft Standard format is clean, simple and easy to follow ... a very streamlined approach... I have to commend you as the as the new layout has provided me with a new way for our organisation to approach the development of an overall Corporate Records and Information Management policy on the physical storage of State records.’
- ‘Consideration in the draft Standard of environmental conditions and an increased focus on security and protection of physical records are most welcome.’
- ‘Overall, the document is more succinct than the current Standard, and the format makes for easy reference. The addition of tables showing minimum compliance requirements and examples of how to demonstrate compliance is particularly useful. We note the more detailed specifications for environmental conditions for different material types ...’
- ‘... it has been improved as it’s more succinct, and the ‘Storage Environment Controls’ have been made easier to navigate now that they’re clearly set out in Tables A &B.’
- ‘We welcome the amendment of the Standard to include requirements outlined in the Australian Government Protective Security Policy Framework. We note the importance of ensuring that digital and physical information security is aligned.’
- ‘We agree for value for money reasons that the standard should provide separate requirements for environmental conditions based on retention periods.’
- ‘We agree with the necessity of sentencing records prior to sending off-site.’
- ‘The practical approach taken by NSW State Archives and Records in recognising that many public offices have difficulties in implementing and maintaining appropriate storage environment conditions is commended.’
- ‘...this draft standard once finalised and promulgated will be a very important lever to further the records management program in compliance with the State Records Act 1998.’

We note that many issues raised, or comments made by public offices, concern requirements that have been in operation for many years under the current storage standard, and which we believe have had an impact on improving practices. No new requirements received negative feedback. A detailed summary is provided below on the issues which were identified and NSW State Archives and Records' responses, including where changes were made to the draft standard.

	Issue	Response from NSW State Archives and Records
1	Request to include a consolidated list of <i>Minimum Compliance Requirements</i> in the Standard.	Agreed. A consolidated listing of <i>Minimum Compliance Requirements</i> has been added to the new Standard.
2	Request to widen the scope of the standard to cover 'active', 'semi-active' and 'inactive' records, not just 'semi-active' and 'inactive' records.	<p>Disagreed. The purpose of the standard is to cover paper records held in storage areas or facilities and to manage these records until they are time-expired, and can be destroyed or transferred as State Archives.</p> <p>We have deliberately chosen to exclude 'active records' from the scope of the standard, as increasingly NSW Government is creating records in digital format, not paper. We were also mindful of NSW Government policy, i.e. digital.nsw, which is transforming how NSW Government conducts business and, that by default, records will be in a digital format.</p> <p>We have recommended that any organisation, creating paper records at this point in time, establish business rules for the creation, management and storage of 'active records'.</p>
<b>Principle 1: Records are stored in appropriate storage areas and facilities and located away from known and unacceptable risk.</b>		
3	Request to distinguish location and risk assessment requirements for short term and long term records storage, as it is not practical for larger organisations to undertake risk assessments for short term records held in storage areas in remote locations.	<p>Disagreed. We do not believe it is necessary to distinguish between short or long term records in regards to requirements for the location of storage areas or the risk assessment. Regardless of the retention period of the records (whether it's less than 10 years or more than 10 years), all records should be stored in appropriate weatherproof, 'fit for purpose' buildings, and that any risks are mitigated. This is not a new requirement and has been in all our Storage standards (e.g. <i>Minimum Compliance Requirement 2.1</i> in the current standard).</p> <p>This issue will be addressed in the implementation guidance for the standard.</p>
4	Proposed change to wording in <i>Minimum Compliance Requirement 1.2</i> to limit Senior Responsible Officer (SRO) approval only to <b>known</b> records storage areas and facilities.	<p>Disagreed. We do not believe it is necessary to make changes to this <i>Minimum Compliance Requirement</i>.</p> <p>This is not a new requirement and has been in operation since 2000. This requirement has been very effective in driving improved storage practices.</p>

5	<i>Minimum Compliance Requirements 1.5 (storage areas and facilities are weatherproof and have good drainage), 1.6 (storage areas and facilities are dedicated to either records or records/library materials storage) and 1.7 (storage areas and facilities have appropriate and comprehensive fire detection and protection systems and equipment, in compliance with the Building Code of Australia and Australian Standards)</i> were identified by one public office as expensive and not practical for short term records.	Disagreed. We do not believe it is necessary to change these <i>Minimum Compliance Requirements</i> which are included in the current storage standard and represent best practice.
6	Request to separate out <i>Minimum Compliance Requirement 1.9</i> into two requirements, in order to highlight the importance of insurance coverage for the recovery and restoration of records in the event of a disaster.	Agreed. Additional <i>Minimum Compliance Requirement</i> added to the standard.
7	Request that the Senior Responsible Officer for records management (SRO) be identified as the appropriate officer to formally advise NSW State Archives and Records if damage or loss occurs to records as a result of a disaster.	Agreed. Additional example added to the <i>Minimum Compliance Requirement</i> to cover this responsibility.
<b>Principle 2: Records are stored in environmental conditions appropriate to their format and retention period.</b>		
8	A number of public offices identified challenges in meeting <i>Minimum Compliance Requirements</i> for temperature and relative humidity.	Disagreed. The storage environmental conditions (i.e. temperature and relative humidity requirements) included in the new standard are unchanged from the 2012 standard.  We note that in consultations on the previous storage standards, public offices identified challenges in meeting temperature and humidity requirements. To assist in meeting these challenges, we have noted in the new standard, that “public offices implement the storage environment conditions and housing requirements as practically and sustainably as possible.” Essentially we want public offices to be pragmatic and focus their efforts on the best possible environmental conditions for long term records and those identified as State Archives.
9	One public office raised concerns about sentencing records prior to the records being transferred to storage and also noted that they held many records in storage which were not sentenced.	Disagreed. The intent behind <i>Minimum Compliance Requirements 2.1, 2.2 and 2.3</i> is that records are stored offsite in secondary storage in the appropriate storage environmental conditions. Sentencing records prior to their transfer to storage is the best way to identify retention periods, match-up records to the most appropriate storage area/facility, and ensure that records are not stored longer than required.

		This issue will be addressed in the implementation guidance for the new standard.
<b>Principle 4: A regular maintenance and monitoring program for records storage areas has been implemented.</b>		
10	Concern that it is not cost effective or practical to have maintenance and monitoring programs for short term storage in regional and remote locations.	<p>Disagreed. This is similar to Issue 3 above and reflects the concerns of a large and geographically dispersed public office.</p> <p>We believe that this issue may best be resolved by the development of organisational plans for records storage which identify where records are to be stored, and taking a pragmatic and cost effective perspective, and focussing on a more regional-hub approaches to records storage rather than storing records in many locations including remote locations.</p> <p>More information on this issue will be provided in the implementation guidance for the standard.</p>
<b>Principle 5: Records are controlled in a system so that they can be identified, located and retrieved.</b>		
11	Concern about transferring digital copies State Archives or long term records.	<p>Disagreed. We note that providing NSW State Archives with digital copies of State Archives, that have been digitised by the public office, is not a new requirement and is currently in operation. We do not require digital copies of long term records that have been digitised.</p> <p>The explanatory section in Principle 5 has been revised to provide more clarity on this issue. The new standard advises that if a public office choses to digitise records that are required as State Archives, then the public office should transfer the records required as State Archives once they have been digitised, and to also provide copies of the digitised images.</p> <p>The purpose for requesting a digital copy of a digitised State Archive is to remove the need for NSW State Archives to re-digitise the same record, thereby saving public money and ensuring a preservation copy of the State Archive. Access directions covering the series of records being transferred to the State Archives Collection will cover the access requirements and any other security considerations.</p>
12	Duplication between the explanatory section of this Principle and the <i>General retention and disposal authority: Original or source records that have been copied (GA 45)</i> .	Agreed. We have made modifications to the explanatory section to remove duplication.
13	It was noted by one public office that <i>Minimum Compliance</i>	Agreed. We have made modifications to <i>Minimum Compliance Requirement 5.4</i> to ensure

	<i>Requirement 5.4</i> appeared to suggest that public offices must digitise physical records.	that digitisation of records is an option, rather than a mandatory requirement.
<b>Principle 6: Records are protected against theft, misuse, unauthorised access or modification.</b>		
14	Need for secure disposal processes for records with security classifications or containing sensitive information and requested that this be incorporated into the draft standard.	Agreed. Information has been added to the explanatory information for Principle 6 identifying that secure disposal processes should be used to dispose of records with security classifications or containing sensitive information.

## Public offices providing comments

### Government department & agencies

- Cancer Institute
- NSW Department of Family and Community Services
- Department of Finance, Services and Innovation
- Department of Industry
- Department of Planning and Environment
- Landcom
- Service NSW
- Sydney Living Museums
- Transport for NSW
- UrbanGrowth NSW Development Corporation

### Local Health Districts

- Far West Local Health District
- Hunter New England Local Health District
- Western NSW Local Health District
- Western Sydney Local Health District

### Universities

- Macquarie University
- Southern Cross University
- University of New England