

# Table of commentary: Standard on records management

In early 2014 State Records undertook a review of five standards issued under s.13(1) of the State Records Act for use by public offices:

- *Standard on counter disaster strategies for records and recordkeeping systems* (Standard No. 6, issued June 2002)
- *Standard on full and accurate records* (Standard No. 7, issued April 2004)
- *Standard on managing a records management program* (Standard No. 8, issued April 2004)
- *Standard on the appraisal and disposal of State records* (Standard No. 9, issued April 2007)
- *Standard on digital recordkeeping* (Standard No. 10, issued September 2008)

During February and March, we sought feedback from public offices on their implementation of the standards and conducted online surveys on each of the five standards. Each survey ran for four weeks and all public offices were contacted and encouraged to provide feedback. A total of 78 public offices provided comments.

While reviewing the standards and the feedback, we decided to develop one new standard which would consolidate and streamline requirements rather than revise five separate standards. By consolidating requirements we were able to develop a new standard with clear foundations in the earlier standards, but also reduce duplication of requirements. With just one standard, we anticipate that organisations will find it easier to understand and implement the requirements for effective records and information management.

The draft *Records management standard for the New South Wales public sector* was released for consultation on State Records' website on 8 August 2014. Over the course of 6 weeks of consultation, 31 written comments and submissions on the standard were received from public offices. While one public office was concerned with the consolidation of requirements into one standard, no public office rejected the draft outright, and many submissions were supportive and endorsed the draft standard.

## Summary of comments

Many submissions expressed support for the proposed standard and noted its usefulness for their own records and information management and initiatives. Comments included:

- "The consolidation of the standards into a single streamlined document is welcomed."
- "...the new standard will be a very useful tool to assist public offices to understand their requirements."
- "The mapping document will prove invaluable in administering the new Standard and in its current form is easy to manipulate in relating to mapping the previous complying principles with the new Standards principle requirements."
- "...Council favourably supports the introduction of the proposed 'Records management standard for the NSW public sector' which will provide benefits such

as ease of adoption and a clear and concise set of complying requirements for NSW public sector agencies in the digital recordkeeping era.”

- “ ..standard firmly positions records within an information management and business framework.”
- “ ..the new Standard format is clean, simple and easy to follow. I was not sure that such a concise document would cover all the elements require, but it does appear to in a very streamlined approach. The original Standard on Digital Recordkeeping, for example, was an incredibly complex document that created a lot of confusion initially. The new Standard is a much easier approach to follow.”
- “ ..The new standard is a much more mature and valuable document and we fully support its adoption as a standard.”
- “Requirements and language is easy to understand, clear and unambiguous. Examples of compliance are easy for all staff to understand.”
- “ ..this document is fantastic!!! It’s so, so much easier to read and understand than the preceding collection of five standards. Now there will be no excuse for non-compliance.”
- “This document has successfully combined the current standards into one user friendly document.”
- “ ...a strong, measurable framework for the requirements of efficient records management processes and controls.”

In response to other comments and suggestions received from public offices, certain revisions and improvements were made to draft standard. Issues raised in submissions have been addressed through revisions to the draft, including:

- change of title of draft standard from *Records management standard for the New South Wales public sector* to *Standard on records management*
- explanatory text added to the Introduction advising why the standard refers to both records and information
- change of *Core requirements* to *Principles* and Requirements (within the core requirements) to *Minimum compliance requirements*
  - adding a new Minimum compliance requirement in Principle 1 identifying the need for organisations to have suitably skilled staff or access to appropriate skills to support the performance of information and records management
- amending the language in explanatory text for Principles and some Minimum compliance requirements, and the addition of further examples of how a public office can demonstrate compliance with the requirement to ensure greater clarity and understanding of requirements

A detailed summary is provided below on the issues which were identified and State Records’ responses, including where changes were made to the draft standard.

### Title of the standard

|   | Issue   | Response  |
|---|---|---|
| 1 | Concern that a standard titled <i>Records management standard for the New South Wales public sector</i> would not be inclusive of all organisations covered by the State Records Act. | The title of the draft standard was amended to <i>Standard on records management</i> which reflects the subject matter of the standard and is inclusive of all sectors of the State Records Act jurisdiction. |

### Introduction

|   | Issue   | Response  |
|---|---|---|
| 1 | One submission was not favourable to a standard which included both 'records and information management' and noted that the standard should solely focus on 'records management'. | <p>Disagreed. In most organisations greater importance is being placed on a wholistic management of records and information. Many of the information systems in our organisations are managing records and information and consequently only integrated approaches will suffice to achieve desired outcomes. This standard will increase the relevance and influence of records management approaches and techniques to the broader digital business environment.</p> <p>We have provided additional text to section 1.4 <i>Scope of the standard</i> to provide clarity around the use of 'records and information' in the standard.</p> |

### 'Core Requirements' and 'requirements'

|   | Issue   | Response   |
|---|---|--|
| 1 | Several submissions identified confusion with the multiple use of requirements in 'Core Requirements' and then 'Requirements' used under each core requirement. | Agreed that this added some confusion to the draft standard. In response we have reverted to language used in earlier standards: <i>Principles</i> identify the high level outcomes within the standard and <i>Minimum compliance requirements</i> identify minimum outcomes that should be achieved by a public office. |

**Principle 1: Organisations take responsibility for records and information management**

|   | <b>Issue</b>   | <b>Response</b>   |
|---|--|---|
| 1 | No explicit statement identifying those who are responsible for the implementation of strategic records and information management and are suitably skilled for this work. | Agreed that an explicit statement requiring organisations to have, or have access to, appropriately skilled staff. This new requirement identifies those staff who are responsible for assisting in the implementation of strategic records and information management in public offices. This has been included as Minimum compliance requirement 1.4. |

**Some requirements are very broad and could be misinterpreted**

|   | <b>Issue</b>  | <b>Response</b>   |
|---|---|---|
| 1 | Several public offices were concerned that some requirements, are very broad and could be misinterpreted.   | <p>Agreed. We have checked and refined the explanatory text for each <i>Principle</i> to ensure that it clearly defines the outcome to be achieved by the minimum compliance requirements linked to the <i>Principle</i>. We have also checked and refined <i>Minimum compliance requirements</i> in the draft standard to ensure that the requirement is clear and will be understood by a wide audience.</p> <p>To further assist understandings of the <i>Minimum compliance requirements</i>, we have re-titled <i>Examples of compliance</i> to <i>Examples of how a public office can demonstrate compliance with the requirement</i> and ensured that there are a range of examples provided to illustrate how a public office could implement the requirement and demonstrate conformity with the requirement. Some submissions provided suggestions for the <i>Examples of how a public office can demonstrate compliance with the requirement</i> and these have been incorporated.</p> |
| 2 | Requirements 3.7 and 3.8 cover the outcomes of appropriate and authorised disposal practices. Several submissions have suggested that these requirements would be misunderstood by a wide audience (and in particular business managers) and that the concept of business used in these requirements could be very narrowly read. | <p>Agreed. We have tightened the requirements (now 3.6 and 3.7) to make it clearer that disposal is a process that needs to be conducted in accordance with the requirements of the <i>State Records Act 1998</i>. We have also included additional wording in the minimum compliance requirements to ensure that public offices are aware of their accountability requirements in undertaking the disposal of records.</p> <p>We have also strengthened the examples provided for these</p>  |

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|  | requirements and have included information on disposal processes and the use of current authorised retention and disposal authorities. |
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**Counter disaster strategies have been omitted**

|   | <b>Issue</b>   | <b>Response</b>   |
|---|--|---|
| 1 | Several submissions noted that counter disaster strategies had been omitted from the standard. | <p>Disagreed. Paper or physical records are covered in the <i>Standard on the physical storage of State records</i>, minimum compliance requirement 2.6 "Each storage area and facility has a current disaster reaction and recovery plan which is regularly revised and equipment / supplies to assist in the recovery of records after a disaster".</p> <p>Digital records and recordkeeping systems are covered in the standard at Minimum compliance requirement 2.2 "High risk and high value areas of business and the systems and records needed to support these business areas are identified." An organisation would be expected to have identified, managed or mitigated their information risks and also ensure that high risk/high value records are protected by the organisation's business continuity strategies. The NSW Government Digital Information Security Policy also covers business processes and continuity.</p> |

## **2.2 Public offices providing comments**

### **Government agencies & authorities**

Ambulance Service NSW

Bureau of Health Information

Cancer Institute NSW

Department of Education and Communities

Department of Justice

Department of Premier and Cabinet

Information and Privacy Commission

Ministry of Health

Office of Finance and Services

Rookwood United Cemeteries

Safety, Return to Work & Support Division (Office of Finance and Services)

Service NSW

Transport for NSW

### **Local Health Districts/Networks**

Central Coast Local Health District

Far West Local Health District

Nepean Blue Mountains Local Health District

South Western Sydney Local Health District

Western NSW Local Health District

Western Sydney Local Health District

### **Universities**

The University of Sydney

### **Local Government**

City of Newcastle

City of Sydney

Fairfield City Council

Holroyd City Council

Kogarah City Council

**Others**

Public Record Office Victoria

Tasmanian Archives and Heritage Office

Recordkeeping Innovation

Siller Systems Administration

2 personal responses