



Australian Government



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How to Develop a Recordkeeping Policy

National Archives of Australia

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EXECUTIVE SUMMARY

The National Archives of Australia has prepared the following advice to help records management professionals within Commonwealth Government agencies produce a recordkeeping policy. With the DIRKS Manual, it provides an essential resource for agencies wishing to address key recommendations of the Australian National Audit Office reports into recordkeeping practices in the Commonwealth jurisdiction.

The Archives strongly recommends that all organisations develop a recordkeeping policy to provide a framework for their recordkeeping practices and processes.

This advice is intended as a comprehensive guide on developing a recordkeeping policy. It explains [why a recordkeeping policy](#) is essential for all organisations, and explores all the issues that organisations should be aware of when [developing](#) and [implementing](#) policy.

This advice defines the [key components](#) of a recordkeeping policy, and provides examples of what these components may look like. These examples are only intended as a foundation; organisations should tailor these examples to ensure that the policy developed is applicable to their specific recordkeeping needs.

The Archives recommends that a recordkeeping policy:

- demonstrates an organisation's commitment to comply with recordkeeping standards and guidelines;
- promotes good recordkeeping practices throughout the organisation;
- applies to all records regardless of format, including electronic records;
- be communicated to all staff;
- be authorised at an appropriate senior level, ie Chief Executive Officer;
- exist in a single identifiable policy statement;
- identify any legislation which affects the organisation's recordkeeping requirements;
- define the recordkeeping responsibilities of all staff within the organisation; and
- be promulgated within the organisation through appropriate documentation, eg business plans, performance agreements.

The National Archives has developed its own recordkeeping policy and this is available on our website for use as an example.

WHY A RECORDKEEPING POLICY?

Background

Under the Public Service Act 1999, the Australian Public Service (APS) is 'openly accountable for its actions, within the framework of ministerial responsibility to the Government, the Parliament and the Australian Public'.ⁱ Heads of organisations are obliged to take reasonable steps to ensure that they understand and operate within the government's accountability framework under directions issued by the Public Service Commissioner pursuant to the Public Service Act 1999. The Public Service Commissioner suggests that organisations can 'demonstrate that due process has been followed in [their] actions and decisions... through the existence and maintenance of good record keeping systems'.ⁱⁱ

Records are a vital corporate asset to organisations, as they capture business transactions and document corporate memory. Within the Commonwealth, good recordkeeping:

- provides evidence of government decisions and activities;
- demonstrates that an organisation's accountability requirements have been met;
- supports business activities through the creation of useable and reliable records, contributing to business efficiency and efficacy; and
- minimises business risk by ensuring that the right records are created to sustain business performance and continuity.

Why a recordkeeping policy?

Policy is a key component of good corporate governance. A corporate policy can foster an appropriate culture, or set of behaviours, within an organisation. It can demonstrate an organisation's commitment to undertake business activities in a diligent and accountable manner. It also helps communicate this commitment clearly and effectively to stakeholders.

The implementation of policy constitutes a corporate control structure. The Australian National Audit Office states that 'an effective control structure will: improve accountability and program delivery; promote ethical and professional business practices; advance risk management; enhance communications, decision-making, and performance reporting; and contribute to quality outcomes.'ⁱⁱⁱ

The Australian Standard for Records Management, AS ISO 15489 also asserts the importance of corporate control structures by stipulating policy as a requirement for compliance to the standard. 'An organization seeking to conform to this part of AS ISO 15489 should establish, document, maintain and promulgate policies, procedures and practices for records management to ensure that its business need for evidence, accountability and information about its activities is met.'^{iv}

In 2001-02, the Australian National Audit Office initiated an audit of recordkeeping practices in four small, centrally administered Commonwealth organisations. The Auditor-General's decision to conduct the audit indicates a growing concern about the standard of recordkeeping within the Commonwealth over recent years. The audit report acknowledges the importance of recordkeeping policy in its key findings. The report states that: 'as part of their corporate governance responsibilities, senior management in Commonwealth organisations should issue a consolidated statement of corporate policy on recordkeeping, both for purposes of accountability and for the information of their staff. The policy would define responsibilities for recordkeeping and set broad recordkeeping standards. Recordkeeping needs to be seen as an integral part of the way organisations do business rather than as something extra at the end of various processes.'^v In a subsequent audit of recordkeeping practices in four large and devolved organisations, conducted in 2002-03, the Audit Office recommended that organisations develop a corporate recordkeeping policy in line with the Archives' advice.^{vi}

The existence of a recordkeeping policy promotes a corporate recordkeeping culture. In 2000, a widespread survey of recordkeeping attitudes and perceptions within the Commonwealth public sector indicated that only 40% of respondents thought that staff had a good understanding of the importance of recordkeeping. Record creators observed that recordkeeping was regarded as a low priority, while record managers commented that staff use of record management systems was poor and lacked consistency within organisations.^{vii}

An effective recordkeeping policy communicates to all within the organisation the importance of good recordkeeping. A recordkeeping policy will demonstrate an organisation's commitment to meeting its legislative requirements, as well as its commitment to comply with recordkeeping standards. By communicating this commitment to staff, a recordkeeping policy increases the likelihood of staff creating accurate and reliable records, with appropriate evidential characteristics.

A relevant and useful recordkeeping policy also enhances business performance, by providing a framework for recordkeeping practices, processes and systems that will protect records as assets. A recordkeeping policy can create a climate that will ensure the ongoing integrity and accessibility of records, in turn guaranteeing the continued contribution of records to the efficient, effective and ethical delivery of quality outcomes.

DEVELOPING A RECORDKEEPING POLICY

Policy objectives

The objectives and intended outcomes of the recordkeeping policy should be identified during the initial stages of policy development. The target audience, that is, all staff within the organisation, should be identified and involved in this process to address any existing recordkeeping issues they may have and to foster their support and adoption of the final product.

The development process

A recordkeeping policy identifies how records are used within an organisation. It acknowledges the need for records to be created and maintained to satisfy an organisation's business, legal, and stakeholder expectations. It also identifies recordkeeping requirements such as form, content, retention, disposal and access. These requirements should be identified with regard to the organisation's exposure to risk if records are not effectively created or managed.

The role of records within an organisation will be affected by the organisation's regulatory environment. The Australian Standard for Records Management, AS ISO 15489, states that: 'all organizations need to identify the regulatory environment that affects their activities and requirement to document their activities. The policies and procedures of organizations should reflect the application of the regulatory environment to their business processes.' A recordkeeping policy must identify any legislation administered by the organisation that affects its recordkeeping, as well as any statutory requirements that legislate records or recordkeeping such as the Freedom of Information Act 1982, the Archives Act 1983, and the Privacy Act 1988. The regulatory environment also includes voluntary standards or codes of practice with which the organisation has chosen to comply.

A recordkeeping policy should also identify, at a general level, the records that need to be created and maintained to support core business functions, as well as to meet stakeholder expectations. Organisations may wish to undertake a more thorough investigation into their recordkeeping requirements to develop specific recordkeeping strategies. DIRKS - A Strategic Approach to Managing Business Information, particularly step E, provides further guidance on developing such strategies.

The existing recordkeeping environment of the organisation should also be understood in order to develop a relevant and practicable recordkeeping policy. This includes identifying recordkeeping strengths and weaknesses, and how recordkeeping is currently supported and controlled within the organisation. This will involve evaluating existing recordkeeping policies, practices and procedures to decide whether they will be integrated within the new recordkeeping policy, or replaced. For example, an organisation may have a 'print to paper' edict for electronic records, supported by a corporate policy on the capture of electronic records. However, the organisation may find that this practice is not being observed and may decide to redefine how electronic records are to be dealt with through a revised policy framework.

Drafting objectives

As a framework, a recordkeeping policy should be simple and concise. The policy should not include any detailed advice on operational procedures or recordkeeping tools (such as classification schemes or disposal schedules). Such products will need to be developed to support the recordkeeping policy.

- A policy document should be easy to understand, and present its recordkeeping directives and responsibilities in a clear and simple manner.
- A policy must contain accurate, relevant and up-to-date information.

A recordkeeping policy framework may be delivered through a variety of disparate documents. However, the creation of a single comprehensive corporate policy statement is a more effective way of controlling and communicating a strong recordkeeping culture.

KEY COMPONENTS OF A RECORDKEEPING POLICY

A recordkeeping policy is a brief statement that offers a broad overview of how the organisation should create and manage its records to satisfy business, legal and stakeholder expectations.

The following section outlines the key components of a recordkeeping policy. Each component is defined and an example offered to describe what the policy might look like. The examples are simply a guide and should be tailored to the needs of the organisation. Organisations may choose to amalgamate or exclude some components depending on their specific circumstances.

- Purpose
- Policy statement
- Scope
- Policy context
- Legislation and standards
- Recordkeeping systems
- Responsibilities
- Monitor and review
- Authorisation
- Glossary
- Resources

Purpose

This statement defines the aims of the recordkeeping policy:

The purpose of this policy is to establish a framework for the creation and management of records within this organisation. This organisation is committed to establishing and

maintaining recordkeeping practices that meet its business needs, accountability requirements and stakeholder expectations.

Policy statement

This statement outlines the organisation's commitment to recordkeeping.

It should define the recordkeeping policy as the framework for an organisation's records and recordkeeping processes. It could also provide a brief background on records, recordkeeping and the regulatory environment of the organisation. Any other important influences or interests specific to recordkeeping within the organisation should be outlined here:

This organisation's records are its corporate memory, and as such are a vital asset for ongoing operations, providing valuable evidence of business activities and transactions.

This organisation recognises its regulatory requirements as a Commonwealth agency, and is committed to the principles and practices set out in the Australian Standard for Records Management (AS ISO 15489).

This organisation is committed to implementing best recordkeeping practices and systems to ensure the creation, maintenance and protection of accurate and reliable records. All practices concerning recordkeeping within this organisation are to be in accordance with this policy and its supporting procedures.

Scope

This statement identifies and defines who and what the policy applies to.

This policy applies to all staff within this organisation.

This policy applies to all aspects of organisational business, all records created during business transactions, and all business applications used to create records including email, database applications and websites.

This policy provides the overarching framework for any other corporate recordkeeping policies, practices or procedures.

Policy context

This statement details how a recordkeeping policy will relate to the disciplines of information and knowledge management practiced in the organisation.

A recordkeeping policy must clearly integrate recordkeeping with information or knowledge management and any information or knowledge management policies:

This organisation's recordkeeping policies and practices are integrated with the organisation's broader information management regime (including business systems and knowledge management). The organisation's Information Management section will

develop all recordkeeping strategies, and is responsible for the design, implementation and review of all recordkeeping practices.

Legislation and standards

This statement identifies the regulatory environment, as it affects recordkeeping within the organisation.

This must include general legislation that affects record creation, management, or access; as well as any legislation specifically administered by the organisation that prescribes the quality and nature of evidence it needs to produce to withstand the scrutiny of the Courts, Parliament, the Ombudsman, or other relevant auditors. This statement should also acknowledge any voluntary standards, codes of practice or guidelines that the organisation has chosen to adopt:

This organisation acknowledges the following laws that relate to records and information:

- *Archives Act 1983*
- *Electronic Transactions Act 1999*
- *Evidence Act 1995*
- *Freedom of Information Act 1982*
- *Privacy Act 1988.*

This organisation will develop recordkeeping systems that capture and maintain records with appropriate evidential characteristics in accordance with its obligations under these pieces of legislation.

[Any legislation or regulations specific to the organisation that have mandatory implications for recordkeeping should be acknowledged here]

This organisation is committed to best practice recordkeeping, and will develop recordkeeping systems consistent with the Australian Standard for Records Management (AS ISO 15489). This organisation has also adopted the National Archives of Australia's Recordkeeping Metadata Standard for Commonwealth Agencies, and will develop recordkeeping strategies utilising the DIRKS methodology outlined in DIRKS - A Strategic Approach to Managing Business Information.

Recordkeeping systems

This statement identifies the corporate recordkeeping systems of the organisation.

It should identify the preferred recordkeeping systems, and mandate their exclusive use to promote compliance amongst staff. If required, this statement could also proscribe use of personal, informal or non-preferred recordkeeping systems. However, this information should remain general, so that the policy will remain relevant even if specific recordkeeping systems are superseded during its projected life.

This statement should also outline the key recordkeeping processes undertaken by the identified recordkeeping systems. Existing operational policies or procedural guidelines that control any of these processes should be linked here to the policy framework:

This organisation's primary recordkeeping system is an electronic records management system. All paper-based records received in the organisation from 1 July 2002 are captured within this system through digital imaging. This electronic records management system is to be used in the central office and all regional offices of the organisation.

This organisation's recordkeeping systems are dedicated to the creation and maintenance of authentic, reliable and usable records for as long as they are required to effectively and efficiently support business functions and activities.

The recordkeeping systems will manage the following processes:

- *the creation or capture of records within the recordkeeping system - see the subsidiary 'Policy on the Capture of Electronic Records' for further information*
- *the storage of records*
- *the protection of record integrity and authenticity*
- *the security of records*
- *access to records*
- *the disposal of records - in general, it is an offence to destroy any Commonwealth record without authorisation from the National Archives of Australia. Unless otherwise authorised, all record disposal within this organisation must be undertaken in compliance with the organisation's approved Records Disposal Authority, and the relevant General Disposal Authorities issued by the Archives.*

Responsibilities

This statement outlines the various recordkeeping responsibilities within the organisation, assigning them to an individual, level and/or area within the organisation.

A recordkeeping policy must identify that all staff are accountable for recordkeeping, although specific accountabilities may vary:

The Chief Executive Officer (CEO) is responsible for the authorisation of the recordkeeping policy. The CEO must oversee the management of this policy within this organisation.

Senior managers are responsible for the management of this policy through resource allocation, and other management support.

The records manager is responsible for overseeing the design, implementation, and maintenance of this recordkeeping policy, as well as monitoring compliance.

The Information Management section is responsible for managing records and recordkeeping within this organisation consistent with the standards described in this policy.

System administrators are responsible for maintaining the technology for this organisation's recordkeeping systems; including responsibility for maintaining the integrity and authenticity of records.

General area managers are responsible for supporting and monitoring staff recordkeeping practices as defined by this policy. Managers should create, and support the creation of records by staff, as part of normal business practices.

All staff are responsible for the creation of accurate and reliable records as defined by this policy.

Monitor and review

This statement sets a date for review.

It may also be used to set up monitoring and review procedures, such as an audit committee:

This policy is scheduled for review by July 2003. This review will be conducted by an internal audit committee established by senior management.

Authorisation

This statement authorises the policy with an appropriate signature and date.

The Archives recommends that the policy is authorised at the highest level, consistent with the Australian Standard for Records Management.

*This policy has been approved by:
John Smith, Chief Executive Officer, 1st May 2001.
[Signature]*

Glossary

This statement is a list of definitions to clarify certain terms used within the policy, such as records, recordkeeping, etc.

For assistance compiling a list of definitions see the *Australian Standard for Records Management, AS ISO 15489.1-2002, Part 1, Section 3.*

Resources

This statement is a list of resources for further information.

This may include contact details of relevant staff within the organisation as well as reference material.

National Archives of Australia, DIRKS - A Strategic Approach to Managing Business Information, 2001. Accessed 26 April 2002 at:
www.naa.gov.au/recordkeeping/dirks/dirksman/dirks.html

National Archives of Australia, Recordkeeping Metadata Standard for Commonwealth Agencies, 1999. Accessed 26 April 2002 at:
www.naa.gov.au/recordkeeping/control/rkms/summary.htm

Standards Australia, Australian Standard for Records Management, AS ISO 15489, Sydney, March 2002.

IMPLEMENTING A RECORDKEEPING POLICY

Even the best policy can fail if it is not effectively implemented. Policy implementation often involves managing and encouraging change. Effective change management is essential to ensuring the successful adoption of policy within the workplace.

A recordkeeping policy should be implemented as a distinct control mechanism in the organisation even if it has been developed alongside other recordkeeping products, such as detailed procedure manuals. This will help ensure that staff clearly recognise the corporate mandate for recordkeeping in the organisation.

Promulgation and promotion

A recordkeeping policy must be promulgated and promoted throughout the organisation or it will quickly become ineffectual.

A recordkeeping policy must be made known to all staff. It should be widely promulgated to clearly inform staff of its contents and implications, and most importantly, to make staff aware of their recordkeeping responsibilities as defined within the policy. The recordkeeping policy should be distributed to all staff, possibly via the staff newsletter, intranet, or hard or soft copy distribution. Any supporting documentation or information should also be made known, such as procedure manuals or guidelines. A recordkeeping policy must be acknowledged and supported through corporate documentation, such as corporate (business) plans, organisation charts and codes of conduct.

However, it is also vital to promote staff compliance with the policy. The recordkeeping responsibilities of all staff members can be made conditions of employment in duty statements, position descriptions and measures in performance

agreements. It may also be useful to highlight how poor recordkeeping may affect individual staff and the organisation through legal action or media exposure.

The support of executive and senior management is vital when promoting policy. Executive support should be made visible through clear authorisation of policy, allocation of appropriate resources, and subsequent monitoring of organisational compliance. This support should also be documented in the employment contracts of senior management, to mandate and create incentives for the effective management of good recordkeeping practices within the organisation.

Training

Staff who can effectively implement the directives of policy are critical to its success. Staff training is essential for this purpose, ensuring that staff do not merely understand their recordkeeping responsibilities but are able to carry them out.

Staff training should clarify any changes in recordkeeping practices instigated by the policy and aim to make such practices as simple as possible.

Supplementary standards, guidelines and procedures

To accompany the policy framework, supplementary recordkeeping standards, guidelines and procedures will need to be developed within the organisation. Appropriate supporting workflow and information technology systems are essential for staff to be able to comply with the requirements of the recordkeeping policy. The DIRKS methodology (especially step E) provides advice on how to identify appropriate recordkeeping strategies. Further information is available in DIRKS – A Strategic Approach to Managing Business Information.

External recordkeeping standards and guidelines should also be adopted to promote good recordkeeping practice throughout the organisation. These may include the Australian Standard for Records Management, AS ISO 15489, and the Archives' Recordkeeping Metadata Standard for Commonwealth Agencies.

Monitoring and review

The success of policy depends on effective monitoring and review mechanisms, to ensure the proper and continued use and relevance of a recordkeeping policy. Policy review should be undertaken at a set time after policy implementation, and continued on an ongoing basis. Policy review should:

- evaluate the policy document for comprehensibility and relevance;
- measure policy impact and results against initial objectives;
- look for unforeseen effects;
- survey organisational awareness of policy and contents; and
- monitor staff adoption and application of policy.

- Review should aim to ensure that the policy continues to support business activities and processes, and recognise when the policy needs to be amended to coincide with workflow changes or recordkeeping developments.

Monitoring and review mechanisms should be tailored to the organisation and integrated with normal business processes. Performance indicators should be identified at the initial stages of policy development to assess improvement over time.

Staff monitoring should include supervision and self-assessment, whereby staff are encouraged to monitor their own responsibilities and also identify any problems or shortcomings within the policy. An internal or external audit may also be desirable to provide an independent perspective on policy operation.

RECORDKEEPING POLICY CHECKLIST

- Does the organisation have a recordkeeping policy?
- Has the policy been authorised at an appropriate senior level?
- Does the policy cover all records, in all formats, in all recordkeeping systems?
- Does the policy identify legislation, standards, and codes of best practice that the organisation's recordkeeping is subject to?
- Does the policy emphasise the creation and maintenance of records with appropriate evidential characteristics?
- Does the policy identify the organisation's recordkeeping requirements?
- Does the policy define its relationship with other information management plans and programs in the organisation?
- Is the policy consistent with ethical standards that are binding upon the organisation, such as the APS Code of Conduct and APS Values?
- Has the recordkeeping policy been promulgated throughout the organisation?
- Is the recordkeeping policy addressed in the organisation's operating procedures, business rules, and manuals?
- Is the recordkeeping policy known and understood by all staff within the organisation?
- Does the policy outline various roles and responsibilities for personnel who manage or perform recordkeeping processes throughout the organisation?
- Are the employee's recordkeeping responsibilities documented in employee codes of conduct, performance agreements, position descriptions or duty statements?

- Have the staff received training to help them carry out the recordkeeping responsibilities outlined in the policy?
- Is staff compliance with the policy monitored?
- Is the recordkeeping policy reviewed at regular intervals?

REFERENCES

Further references for developing a recordkeeping policy:

Australian National Audit Office, *Controlling Performance and Outcomes: Better Practice Guide to Effective Control*, December 1997; accessed 26 March 2002.

Australian National Audit Office, *Recordkeeping*, Audit Report No. 45, May 2002; accessed on 1 May 2002.

Australian National Audit Office, *Recordkeeping in Large Commonwealth Organisations*, Audit Report No.7, Sept 2003; accessed on 20 October 2003.

Public Service and Merit Protection Commission, *Values in the Australian Public Service*, 2000; accessed on 1 May 2002.

ENDNOTES

ⁱ Public Service and Merit Protection Commission, *APS Values*, March 2000; accessed 1 May 2002.

ⁱⁱ Public Service and Merit Protection Commission, *Values in the Australian Public Service*, 2000; accessed 1 May 2002.

ⁱⁱⁱ Australian National Audit Office, *Controlling Performance and Outcomes: Better Practice Guide to Effective Control*, December 1997; accessed 1 May 2002. [back] Standards Australia, *Australian Standard for Records Management, AS ISO 15489*, Sydney, March 2002.

^{iv} Australian National Audit Office, *Recordkeeping*, Audit Report No.45, May 2002, accessed 1 May 2002.

^v Australian National Audit Office, *Recordkeeping in Large Commonwealth Organisations*, Audit Report No.7, Sept 2003; accessed on 20 October 2003.

^{vi} National Archives of Australia, *Report on Research into Attitudes, Perceptions and Current Behaviour Toward Record Keeping in Commonwealth Public Sector Organisations*, August 2000 (Microsoft PowerPoint presentation, 216kb); accessed 1 May 2002.

^{vii} National Archives of Australia, *Recordkeeping and the Law*, accessed 7 May 2002. However, at the time of publication this advice did not include information about the Electronic Transactions Act 1999. For advice on this Act see www.austlii.edu.au/au/legis/cth/consol_act/eta1999256/.