

State Records Authority of New South Wales

Standard: No. 7

Standard on full and accurate records

issued under the State Records Act 1998

Approved April 2004

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Standard for Records Management

Standard no 7

SR file no 04/0233

Title of Standard Standard on full and accurate records

Scope The standard sets out principles for making and keeping full and accurate records of the activities of a public office.

Application The standard applies to all public offices as defined in section 3 of the *State Records Act 1998*, to which Part 2 of the Act applies. The standard covers all State records on any topic and in any format.

Authority This standard is issued under section 13(1) of the State Records Act. It has been approved by the Board of the State Records Authority in accordance with section 13(2) of the State Records Act.

Authorised This standard was approved by David Roberts, Director, State Records Authority of New South Wales, on 21 April 2004.

Standard on full and accurate records

Summary

This standard sets out principles for making and keeping full and accurate records as required under section 12(1) of the *State Records Act 1998*. The principles are:

- Records must be made
- Records must be accurate
- Records must be authentic
- Records must have integrity
- Records must be useable

Each principle is supported by mandatory compliance requirements.

In this standard

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Introduction

Purpose

Section 12(1) of the *State Records Act 1998* requires public offices to 'make and keep full and accurate records'. The purpose of this standard is to assist public offices to meet this obligation and to provide a benchmark against which a public office's compliance may be measured.

Authority

The standard is issued under s.13(1) of the State Records Act 1998 which enables State Records to 'approve standards and codes of best practice for records management by public offices.'

Application

This standard applies to public offices as defined in s.3 of the State Records Act, to which Part 2 of the Act applies. This standard covers all State records on any topic and in any format.

Background

The standard was first issued to government agencies in 1998 under the Premier's Memorandum 98-16. Following the passage of the State Records Act 1998, it was approved for use by all public offices subject to Part 2 of the Act in 1999.

Following experience in implementation and consultation with public offices, the standard has been revised.

Structure

This standard sets out five principles for full and accurate records. Under each heading, there is an explanation of the principle and identified compliance requirements.

Definitions

For definitions of general recordkeeping terms used in this document, see State Records' *Glossary of Recordkeeping Terms*.

Further information

Links to supporting publications are provided in Appendix B. For more information on this standard, please contact State Records.

Using this standard

Overview

This section provides context for the requirements of the standard, explaining the meaning and benefits of 'full and accurate' records.

What are full and accurate records?

Full and accurate records are sources of detailed information and evidence that can be relied on and used to support current activities. They are records that have been created and managed in ways to ensure that they can be reused and understood in the future. This use can be for everyday business purposes, as evidence in legal proceedings, for accountability to internal or external stakeholders, or for future historical research.

To be full and accurate, records must:

- be made
- be accurate
- be authentic
- have integrity, and
- be useable.

Records can be found in a variety of formats. This includes paper records, document-type electronic records, records of web-based transactions and records in business systems. They can document core organisation business or procedures or administrative tasks.

Content, Context and Structure

A record is more than its informational content. As well as content, a record must have context and structure.

Context refers to the context of record creation - who created it, when, how and why. Structure refers to the relationship between the component parts of the record. These elements aid in understanding the content of the record and give it meaning.

All three elements of the record - content, context and structure - must be present and maintained to ensure full and accurate records.

Benefits of full and accurate records

The benefits of having full and accurate records are the benefits of good recordkeeping. Full and accurate records will:

- Support business outcomes. By clearly documenting work processes, full and accurate records reduce the need to rely on memory or to 're-invent the wheel', aiding operational efficiency.
- Support decision making. They provide a reliable story of what decisions have been made and why, what actions were taken and the outcomes of these.
- Support accountability. By documenting what happened and why, records demonstrate that correct processes were followed. The Independent Commission Against Corruption has identified good records as a vital line of defence against fraud and corruption.¹
- Provide evidence. Records are routinely presented as evidence in legal proceedings. A review by the Audit Office of NSW of out-of-court settlements found that some government agencies were unable to defend their case due to a lack of records.²

Relationship between full and accurate records and recordkeeping

Full and accurate records are produced and kept as a result of the activity of recordkeeping. Recordkeeping is the making and maintaining of complete, accurate, reliable evidence of business transactions. Recordkeeping is successfully performed through the implementation of recordkeeping systems.

The *Standard on Managing a Records Management Program* provides information on the appropriate management infrastructure for good recordkeeping. Appropriate recordkeeping systems, processes and tools are fully described and explained in State Records' *Government Recordkeeping Manual* and other guidance. Of particular significance to this standard is State Records' guidance on designing and implementing recordkeeping systems: *Strategies for Documenting Government Business: The DIRKS Manual*.

The structure of the standard reflects this relationship between records and recordkeeping. The principles outline necessary characteristics of records. The compliance requirements, implementation tips and references to other guidelines point to recordkeeping controls and processes required to achieve the record outcomes.

¹ Independent Commission Against Corruption, *Fighting Fraud: Guidelines for State and Local Government* November 2002. Available online at http://www.icac.nsw.gov.au/pub/public/pub2_66cp.cfm.

² Audit Office of NSW, *Auditor-General's Report to Parliament 2000* Volume Six December 2000. Available online at <http://www.audit.nsw.gov.au/agrep00v6/Contents.html>.

Recordkeeping systems

Recordkeeping systems are not just records management software packages. Many business systems, e.g. personnel and payroll databases, financial management systems, are also recordkeeping systems as records are made by and kept in these systems. Systems do not have to be technology based - some public offices use paper-based recordkeeping systems.

Principles

Principle 1: Made

Records must be made

A public office must ensure that records are made that document or facilitate the transaction of a business activity. The records can be automatically generated by a business system or deliberately made by a person who was involved in the transaction. Decisions on what records need to be created to support particular business processes and activities is a risk based decision. If the record was not an automatic or direct by-product of business, the record should be made as soon as practicable after the event.

Examples of business activities where records may need to be made deliberately are:

- inwards and outwards communication, whether hard copy, electronic or notes of a telephone conversation
- minutes of meetings and other consultations and deliberations
- oral decisions and commitments
- the exercise of discretionary judgement, and
- contractual arrangements and agreements.

Compliance requirements

1. Requirements to make records are identified and documented.
2. Policy, procedures and business rules direct how and when records should be made and captured.
3. All staff are aware of their responsibilities to make records.
4. Required records are made.

Principle 2: Accurate

Records must be accurate

All records made by the public office must be a correct reflection of what was done, communicated or decided. An accurate record is one that can be trusted as a true representation of the transactions or events which it documents.

Designing systems for the automatic or easy creation and capture of records helps ensure accuracy of records. Business practices and procedures can also support accuracy, for example, by requiring that minutes of meetings are agreed to and endorsed by participants.

Compliance requirements

1. Records are accurate.
2. Records are made at the time of or as soon as practicable after the event or transaction to which they relate.

Principle 3: Authentic**Records must be authentic**

An authentic record is one that can be proven:

- to be what it claims to be,
- to have been created or sent by the person claimed to have created or sent it, and
- to have been created or sent at the time claimed.

Capturing records made or received by the public office into official recordkeeping systems with necessary metadata helps ensure authenticity. Metadata also facilitates the retrieval and use of the records and supports their management over time. An official recordkeeping system is one identified in policies or procedures as the appropriate system for documenting business activities. Different systems may be used for different business activities.

Note: Recordkeeping metadata is information needed to use and access records over time. Metadata is used to describe and manage records in any format. Use metadata to document what records you have, where they are, what they relate to, who can access them and how they are managed.

Note: Recordkeeping systems are not just records management software packages. Many business systems, e.g. personnel and payroll databases, financial management systems, are also recordkeeping systems as records are made by and kept in these systems. Systems do not have to be technology based - many public offices have some or all paper-based recordkeeping systems.

Compliance requirements

1. Records are routinely captured into official recordkeeping systems.
2. Appropriate metadata is created and captured, or otherwise associated with, records.

Principle 4: Integrity**Records must have integrity**

A record with integrity is complete and unaltered, now and in the future. It can be proven to have been managed appropriately through time.

Records must be tamper-proof. They should be protected against unauthorised access, alteration, deletion or loss. Disposal of records without the permission of State Records is prohibited by Part 3 of the State Records Act. Permission to dispose of records normally occurs through an authorised retention and disposal authority.

Over the course of time, records may be moved or migrated from one system to another. To preserve the integrity of the record, this process must be carefully managed.

Records management techniques such as folio numbering or document level registration can help ensure the integrity of a record by making document removal or deletion more apparent. In electronic systems, audit logs can also document attempts to alter or delete records.

Compliance requirements

1. Unauthorised access, alteration, deletion or destruction of records is forbidden by office policy and practice.
2. Recordkeeping systems and storage facilities are designed and implemented to protect records from unauthorised access, alteration, deletion or loss.
3. Records are uniquely identified.
4. Migration of records from one system to another is controlled and documented.

Principle 5: Useable

Records must be useable

A record must be understandable, complete, retrievable and available through time.

To be understood, records need to be linked to the context of their creation. This is usually achieved by using metadata to link records to the business functions and activities that generated them, and to related records. Care should also be taken that the content of records is understandable. Records creators should be encouraged to make records that give a sufficiently detailed picture or account of the event to ensure the records can be understood in the future or by users who were not directly involved in the events documented. Records must be kept and be accessible as long as they are required.

Though a record must be useable, not all records should necessarily be available to everyone. Issues of privacy, security and confidentiality must be addressed.

Compliance requirements

1. Records are linked to the business context.
2. Records relating to the same business activity or transaction are linked to each other.
3. Location and use of records is recorded and tracked.
4. Records are accessible for as long as they are required.

Appendix A: List of compliance requirements

The table below lists the compliance requirements contained in this standard.

1	Records must be made
1.1	Requirements to make records are identified and documented.
1.2	Policy, procedures and business rules direct how and when records should be made and captured.
1.3	All staff are aware of their responsibilities to make records.
1.4	Required records are made.
2	Records must be accurate
2.1	Records are accurate
2.2	Records are made at the time of or as soon as practicable after the event or transaction to which they relate.
3	Records must be authentic
3.1	Records are routinely captured into official recordkeeping systems.
3.2	Appropriate metadata is created and captured, or otherwise associated with records.
4	Records must have integrity
4.1	Unauthorised access, alteration, deletion or destruction of records is forbidden by office policy and practice.
4.2	Recordkeeping systems and storage facilities are designed and implemented to protect records from unauthorised access, alteration, deletion or loss.
4.3	Records are uniquely identified.
4.4	Migration of records from one system to another is controlled and documented.
5	Records must be useable
5.1	Records are linked to the business context.
5.2	Records relating to the same business activity or transaction are linked to each other.
5.3	Location and use of records is recorded and tracked.
5.4	Records are accessible for as long as they are required.

Appendix B: Implementing the Standard

This appendix is provided for advice only. It does not form part of the requirements of the standard.

Records management processes and practices will vary between public offices because of differences in size, complexity and ways of carrying out business. However the principles of full and accurate records will be the same for all NSW public offices.

The principles of the standard are focused on outcomes so that they are flexible enough to accommodate the different organisational contexts in which they will be implemented. This appendix gives some guidance on implementing the principles, including links to existing guidance from State Records and other bodies, and links to other standards.

Small public offices should see the *Records Management Program Toolkit* for practical assistance with implementing this standard.

	Requirement	Examples of how to comply	Further guidance
1	Records must be made		
1.1	Requirements to make records are identified and documented	Review legislation that applies to the public office and interview staff to determine requirements. This may be done on a function-by-function basis, or through tracing business processes. You should document the requirements by source, or by function or business area.	Section 1 in <i>Create and Capture: Guidelines on better recordkeeping</i> Step C in <i>DIRKS</i>
1.2	Policy, procedures and business rules direct how and when records should be made and captured	Write procedures on how to manage records in your organisation. Procedures for certain business activities, eg complaints handling, could incorporate advice on recordkeeping Records creation and capture can be integrated in business rules for workflow and transaction systems	Examples of policies and procedures Directed by Policy principle in <i>Standard on Managing a Records Management Program</i> Section 3.2 and 3.3 in <i>Create and Capture: Guidelines on better recordkeeping</i>
1.3	All staff are aware of their responsibilities to make records	Incorporate requirements into staff training, position descriptions, into business processes and procedures. Sets of requirements could be presented to particular business areas.	Implemented principle in <i>Standard on Managing a Records Management Program</i> Section 3 in <i>Create and Capture: Guidelines on better recordkeeping</i>
1.4	Required records are made	Reviews and monitoring of records statistics can be used	<i>Monitoring Recordkeeping Performance guidelines</i>

		to identify areas of the organisation which are not creating records or appear to be creating too few. Creation of records can be automated through systems design	
2 Records must be accurate			
2.1	Records are accurate	Emphasise the importance of accuracy in training for staff Spot checks of records for accuracy can be integrated in audit or monitoring processes	Implemented and Monitored and Reviewed principles in <i>Standard on Managing a Records Management Program</i> Section 3.1 in <i>Create and Capture: Guidelines on better recordkeeping</i>
2.2	Records are made at the time of or as soon as practicable after the event or transaction to which they relate.	Emphasise the importance of timely recordkeeping in staff training. Where possible, build automatic records creation into business systems and workflow.	Implemented and Monitored and Reviewed principles in <i>Standard on Managing a Records Management Program</i>
3 Records must be authentic			
3.1	Records are routinely captured into official recordkeeping systems	Regular monitoring of recordkeeping systems, for example, statistics on file creation, can highlight areas where records are not being captured. Business systems can be designed to automatically capture records.	Monitored and Reviewed principle in <i>Standard on Managing a Records Management Program</i> Section 1.5 and 3.3 in <i>Create and Capture: Guidelines on better recordkeeping</i>
3.2	Appropriate metadata is created and captured, or otherwise associated with, records	Audit recordkeeping systems against the metadata standard, or the basic mandatory records metadata. Metadata elements also cover the requirements of 5.3.	<i>New South Wales Recordkeeping Metadata Standard</i> <i>Doing DIRKS to specify and apply recordkeeping metadata</i> <i>RIB 18: Introducing recordkeeping metadata</i>
4 Records must have integrity			
4.1	Unauthorised access, alteration, deletion or destruction of records is forbidden by office policy and practice	Ensure this is covered in policies and in staff training.	Section 3.2 in <i>Create and Capture: Guidelines on better recordkeeping</i>

4.2	Recordkeeping systems and storage facilities are designed and implemented to protect records from unauthorised access, alteration, deletion or loss	<p>Liaise with IT colleagues on compliance with Office of Information and Communication Technology guidelines on information security.</p> <p>Ensure storage facilities are physically secure and access is controlled.</p>	<p><i>Information Security Guidelines</i> (see www.gcio.nsw.gov.au/library/guidelines/791/)</p> <p>Section 3.2, Security, in <i>Guidelines on the Physical Storage of State Records</i></p>
4.3	Records are uniquely identified	<p>One of the mandatory metadata elements.</p> <p>Usually done through file titling in paper or document-based electronic recordkeeping systems.</p> <p>In databases and business systems that also manage records, look for transaction numbers or other ways that records are uniquely identified.</p>	<p><i>RIB 18: Introducing recordkeeping metadata</i></p> <p>"Information on file covers" in <i>File Format: A guide to the physical design and construction of files</i></p>
4.4	Migration of records from one system to another is controlled and documented	Liaise with IT colleagues on migration strategies, when required.	<i>Future Proof: Ensuring the accessibility of technology/equipment dependent records</i>
5 Records must be useable			
5.1	Records are linked to the business context.	<p>Records can be linked to business context by classifying or titling by business function and activity.</p> <p>For records in business systems, the system documentation should identify business context.</p> <p>The list of recordkeeping systems can also contain information on the business context of the records each system contains (see Principle 3).</p>	<i>Step B of DIRKS</i>
5.2	Records relating to the same business activity or transaction are linked to each other	<p>Records can be linked in many ways including:</p> <ul style="list-style-type: none"> - placing related documents in a physical or virtual file - creating "related item" metadata links - using a classification scheme to title paper or electronic files. 	<p><i>Step B of DIRKS</i></p> <p><i>Developing & Implementing a keyword thesaurus</i></p> <p><i>RIB 18: Introducing recordkeeping metadata</i></p>

		<ul style="list-style-type: none"> - client numbers may link related transactions in databases and business systems 	
5.3	Location and use of records is recorded and tracked	<p>This requirement is part of basic records metadata.</p> <p>Tracking movement on file covers or in recordkeeping software</p> <p>Using audit log functionality in recordkeeping systems.</p>	<i>RIB 18: Introducing recordkeeping metadata</i>
5.4	Records are accessible for as long as they are required	<p>A retention and disposal authority will specify how long records are required.</p> <p>Consider:</p> <ul style="list-style-type: none"> - appropriate physical storage - system security and - future requirements 	<p>Implemented principle in <i>Standard on Managing a Records Management Program</i></p> <p><i>Standard on the Physical Storage of State Records</i></p> <p><i>Information Security Guidelines</i> (see www.gcio.nsw.gov.au/library/guidelines/791/)</p> <p><i>Future Proof: Ensuring the accessibility of technology/equipment dependent records</i></p>