


Recordkeeping for Good Governance Toolkit

GUIDELINE 3: Model Recordkeeping Policy





The original version of this guideline was prepared by the Pacific Regional Branch of the International Council on Archives (PARBICA) for use by countries around the Pacific. This means that the guideline may refer to things that you are not familiar with or do not use in your country. For example, not all governments have an auditor-general who reviews the financial and other records of government departments. You may find that you need to change some of the advice in this guideline to suit your own government's arrangements. To obtain an editable copy of this guideline, contact the national archives, public record office or other records authority in your country, or contact PARBICA at <http://www.parbica.org>.

CONTENTS

Why have a recordkeeping policy?	3
Using the Model Policy	4
Key elements of the Model Policy	5
Model Recordkeeping Policy	6
Tailoring the Model Policy	12
Implementing your recordkeeping policy	16
About PARBICA and the <i>Recordkeeping for Good Governance Toolkit</i>	18



WHY HAVE A RECORDKEEPING POLICY?

Strong systems for the creation and management of records and the preservation of archives are key foundations of good business practice, as well as essential to good governance and collective memory in countries, states and territories in the Pacific region. The *International Standard on Records Management* (ISO 15489) provides guidance on how to put strong records management systems in place.

Drawing on this International Standard, the Pacific Regional Branch of the International Council on Archives (PARBICA) has developed the Recordkeeping Capacity Checklist, which provides more detailed information on the kinds of systems, processes and other arrangements that must be in place to manage records well. You can find the checklist on the PARBICA website at <http://www.parbica.org/Toolkit%20pages/ToolkitGuideline1.htm>.

Both the International Standard and the Checklist emphasise the importance of having a records management policy to achieve good recordkeeping and good governance. Having a records management policy helps staff to understand the importance of managing records well, and sets the broad standards that staff should follow to achieve good records management.

USING THE MODEL POLICY

PARBICA has developed this Model Policy to provide a starting point for Pacific Islands governments and other organisations that wish to implement or update a records management policy. It was drafted in consultation with a working group, which was made up of representatives from the following countries:

- Australia
- Cook Islands
- Fiji
- Nauru
- New Zealand
- Palau
- Papua New Guinea
- Samoa
- Vanuatu.

This Model Policy should be considered a draft. It covers all of the kinds of things that you should consider when developing a recordkeeping policy for your own country. Each country that uses this Model Policy will need to make changes to some parts of the text to make sure it fits in with its own legal, administrative and cultural requirements. There is more information about how to tailor the Model Policy, and how to implement your own recordkeeping policy, later in this document.

KEY ELEMENTS OF THE MODEL POLICY

The International Standard says that records management policies should:

- include an objective to create and manage authentic, reliable and useable records;
- be communicated and implemented at all levels of the organisation;
- be adopted and endorsed at the highest levels of the organisation;
- assign responsibilities for complying with the policy;
- recognise the laws, standards and best practices that impact on recordkeeping; and
- be reviewed regularly.

In addition, the Recordkeeping Capacity Checklist suggests that records management policies should:

- include email and other electronic records in its definition of records; and
- allow for penalties for staff who do not comply with the policy.

As you read the Model Policy, you will see that it covers all of these requirements. As a result, using the Model Policy as a starting point for your own recordkeeping policy can help you to comply with the International Standard and the Recordkeeping Capacity Checklist.

You will notice, however, that some areas of the Model Policy do not seem to apply to your country or organisation. The Model Policy needs to be very broad because it has been drafted to assist organisations in many different countries. This means that sometimes the words it uses or the arrangements it describes are different to the situation in your own country. If this is the case, you should think about amending the Model Policy so that it fits better with your country's own arrangements, and so that the people who use your policy will understand it better.

MODEL RECORDKEEPING POLICY

Date of effect:	2 March 2006
Date of last revision:	2 March 2009
Contact:	National Archivist

Purpose

The purpose of this policy is to state the government's commitment to good recordkeeping in support of good governance, and to assign responsibilities for good recordkeeping within government. This is to make sure that the principles set out in this policy statement can be maintained.

Scope

This policy applies to all government employees, including temporary and casual employees, and to contractors and volunteers.

Application

This policy applies to all files, emails, memoranda, minutes, audiovisual materials and any other documents that are created or received by government officers in the course of their duties. It also applies to all confidential and classified records.

A record is evidence of an official transaction or decision. If any government officer carries out government business, whether in writing or by email – including from a private email account – the documents that arise from that government business are government records, and must be managed according to this policy.

Policy statement

The government is committed to achieving best practice in its recordkeeping, in support of good governance. To do this, it aims to progressively improve its recordkeeping in order to comply with the *International Standard on Records Management* (ISO 15489).

Records of the government's actions and decisions are knowledge assets, and are a vital part of the government's corporate memory. Managing these assets in an efficient way can help to save time and money by ensuring that vital information can be located when it is needed. Easy retrieval of the valuable information held in government records is good business practice. Protecting this information, so that it is not lost or destroyed while it is still needed, is essential to accountability. It is also essential to protect the government's and the community's interests, and the rights and entitlements of citizens. The government also has a responsibility to maintain the security, confidentiality and privacy of the information resources it holds.

Government records provide important historical information and constitute a significant part of the nation's history. They help in the understanding of our national identity and progress as a sovereign nation. Current government records may be selected as part of the ongoing archival resources of the nation, and should be managed to ensure that they can be retained for the benefit of future generations.

To ensure that the government gains maximum benefit from its information resources, this policy requires all government organisations to ensure that:

- full and accurate records of all of their activities are made;
- these records are managed efficiently to ensure they can be retrieved when needed and not released inappropriately; and
- no records are destroyed without the permission of the national archivist.

Laws and regulations

There is a wide range of laws, regulations and standards that have an impact on how the government manages its information resources, including records. These may include, but are not limited to, the:

- Anti-corruption Act
- Intellectual Property Act
- Archives Act
- Money Laundering Act
- Audit Act
- Ombudsman Act
- Electronic Transactions Act
- Privacy Act
- Evidence Act
- Public Finance Act
- Freedom of Information Act
- Public Service Act.

In addition, laws and regulations specific to individual government agencies may need to be considered. For example, some laws require that agencies make certain information available to the public, or oblige government bodies to keep some information for a particular length of time.

The government as a whole also strives to implement the *International Standard on Records Management* (ISO 15489).

Responsibilities

All government officers must play a part in ensuring that full and accurate records are created and managed by government, and that these records are kept for as long as they are needed for administrative, accountability and historical purposes. Some areas of government also have particular responsibilities.

Chief executive officers

All heads of government bodies, including chief executive officers (CEOs), permanent secretaries and chairs of boards, have a responsibility to:

- endorse this policy for use in their own organisation;
- ensure that all staff within their organisations know about and understand this policy;
- promote compliance by all staff with the policy;
- enforce appropriate disciplinary action against staff who do not comply with the policy;
- assign responsibility for the management of their organisation's records to a senior officer;
- ensure that there is an adequately resourced records management program within their organisation; and
- monitor and evaluate the records management performance of their organisation.

Senior corporate managers

The chief executive officer is responsible for assigning a senior officer within the organisation to take responsibility for the management of the organisation's records. Chief executive officers may choose to take this responsibility for themselves, or they may assign it to a chief information officer, the head of corporate services or a senior records manager.

The officer assigned to take responsibility for records management within the organisation must:

- develop and implement strategies and procedures to manage the organisation's records;
- ensure that those strategies and procedures take account of all laws, regulations and standards that apply to the organisation;
- support the chief executive officer in ensuring compliance with this policy;
- ensure that staff have adequate training and advice on recordkeeping;
- consider including the requirement to create and properly manage organisational records as a standard feature in all position descriptions;
- contribute to any reviews of this policy; and
- authorise destruction of the organisation's records only in consultation with the national archives.

Managers and supervisors

All managers and supervisors within the organisation must:

- ensure that their staff are aware of and understand this policy;
- ensure that they and their staff comply with this policy and with any procedures issued by the senior corporate manager; and
- make staff available for recordkeeping training when required.

Records management and registry staff

Records management and registry staff are responsible for the day-to-day management of the organisation's records. They must:

- comply with this policy and follow any procedures for records management issued by the senior corporate manager; and
- provide advice to other staff on records management that is consistent with this policy.

Information and communications technology staff

Many computer systems within government organisations are used to carry out government business, which means that they may create evidence of the organisation's actions and decisions that should be preserved as records. This is especially true of email systems. Information and communication technology staff must ensure that:

- they consult with records management staff before they buy, design or decommission information technology systems;
- any information technology systems that store government information, documents or records have back-ups; and
- policies, procedures and systems are in place to protect government information from inappropriate access or destruction.

The National Archives

The National Archives is the key government agency responsible for monitoring and assisting government to meet its recordkeeping responsibilities. To achieve this, the National Archives and its staff will:

- provide advice to other government agencies on how to comply with this policy;
- consult with senior corporate managers to determine which records can be responsibly destroyed and which must be retained as part of the archival resources of the nation;
- accept transfers of records that have been assessed as being of archival value so that they can be preserved for future generations; and
- assist government with the monitoring and review of this policy.

All staff

While the groups mentioned above have special responsibilities in relation to recordkeeping, they also have the same responsibilities as all other staff within the organisation. This includes chief executive officers, senior corporate managers, and other managers and supervisors.

All staff must:

- comply with this policy and with any recordkeeping procedures issued by the organisation;
- ensure that they make and file records of all of the actions and decisions they take as government officers, including:

- writing and filing notes of telephone conversations;
- printing and filing emails (including emails regarding government business sent from or received by private email accounts); and
- taking and filing minutes of meetings;
- handle records with care so that they are not lost, damaged or destroyed;
- prevent unauthorised access to government records; and
- ensure that records are not destroyed without the authorisation of the national archivist and the senior officer who has been assigned responsibility for records management.

Monitoring and review

This policy will be regularly monitored and reviewed in consultation with the National Archives to ensure that it remains relevant to all government bodies. In addition, senior officers who are responsible for recordkeeping in each organisation should regularly monitor their compliance with this policy and report the results to the National Archives when required.

This policy will be formally reviewed within three years of the date of issue. Later reviews may take place after a longer period, once the efficient and effective operation of the policy has been confirmed.

Authorisation

This policy was approved by the Chair of the Public Service Commission on 2 March 2009.

Definitions

<i>Access</i>	The opportunity to, and means of, finding and using information.*
<i>Accountability</i>	The principle that individuals, organisations and the community are responsible for their actions and may be required to explain them to others.†
<i>Archives</i>	Records of an organisation or individual that have been selected for indefinite retention because of their continuing value for legal, administrative, financial or historical research purposes. An organisation whose main function is to select, manage, preserve and make archival records available for use.*
<i>Business activity</i>	A term covering all the functions, processes, activities and transactions of an organisation and its employees.†
<i>Governance</i>	The systems, structures, processes and rules that an organisation uses to make decisions, take action, manage resources and monitor progress.#
<i>Record</i>	Information created, received and maintained as evidence by an organisation in the course of carrying out its business activities.*

Recordkeeping The process of creating and maintaining complete, accurate and reliable evidence of business transactions in the form of recorded information.[†]

* Definition drawn from Jackie Bettington (ed.), *Keeping Archives*.

† Definition drawn from Archives New Zealand, *A Guide to Developing a Recordkeeping Policy*.

Definition drawn from Standards Australia, *Corporate Governance: Good Governance Principles* (AS 8000–2003).

References

Archives New Zealand, *A Guide to Developing a Recordkeeping Policy*, Wellington, 2006.

Bettington, Jackie (ed.), *Keeping Archives* (3rd edn), Australian Society of Archivists, Canberra, 2008.

International Standards Organisation, *Information and Documentation: Records Management* (ISO 15489), Geneva, 2001.

Pacific Regional Branch of the International Council on Archives, *Recordkeeping for Good Governance Toolkit*, available at <http://www.parbica.org/Toolkit%20pages/ToolkitIntroPage.htm>.

Standards Australia, *Corporate Governance: Good Governance Principles* (AS 8000–2003), Burwood, New South Wales, 2003.

TAILORING THE MODEL POLICY

You may need to make some changes to this Model Policy before it is suitable for use in your own country. The information below is designed to help you to make good decisions about which parts of the Model Policy you may need to change.

The national archives bodies in Australia and New Zealand have provided guidance on developing a records management policy. The PARBICA working group followed this guidance when it produced the Model Policy. You may, though, find the Australian and New Zealand advice useful when you decide to tailor the Model Policy to your own needs:

- Archives New Zealand, *A Guide to Developing a Recordkeeping Policy*
<http://continuum.archives.govt.nz/files/file/guides/g6/index.html>
- National Archives of Australia, *How to Develop a Recordkeeping Policy*
<http://www.naa.gov.au/records-management/publications/RK-policy.aspx>.

Sections of the Model Policy: Purpose

This section of the Model Policy is designed to explain to the reader what the policy is for.

You may not need to change this section of the Model Policy.

If you do choose to change this section, think about the outcome your policy aims to achieve. You may wish to refer to issues such as:

- assigning responsibilities for records management;
- providing a framework for records management procedures; or
- complying with the *International Standard on Records Management*.

Sections of the Model Policy: Scope

This section of the Model Policy is designed to make it clear who the policy applies to.

You may not need to change this section of the Model Policy.

If you do choose to change this section, think about which parts of government should be bound by the policy, who will be handling records within these organisations and who should be required to abide by the policy. You should also think about whether this policy will apply to every government body, your particular organisation, or a combination of organisations. The 'Scope' section should clearly say who must abide by the policy, for example:

- 'This policy applies to all government employees.'
- 'This policy applies to the employees of all government bodies, except those of the Parliament.'
- 'This policy applies to all employees of the Ministry of Works.'

Ideally, the policy should apply to the whole of your government and all of the bodies within it. This Model Policy has been written as though it applies to the whole government. You may, however, be interested in producing a policy only for your organisation. Alternatively, your government may want the policy to apply to most government agencies, with some

exceptions. The parliament and the courts are organisations that are sometimes exempted from recordkeeping policies. PARBICA does not recommend this, and instead advises that recordkeeping policies should apply to all parts of the government.

If your recordkeeping policy is not going to apply to all government bodies, you will need to pay particular attention to the 'Responsibilities' and 'Authorisation' sections, to make sure that they are consistent with the scope of your policy.

Sections of the Model Policy: Application

This section of the Model Policy is designed to make it clear what types of materials the policy applies to.

You may not need to change this section of the Model Policy.

If you do choose to change this section, think about what formats the information your government handles might be found in, and whether or not it is appropriate for them to be covered by this policy. You may wish to name particular types of documents, such as letters or emails, to make sure that staff clearly understand what a record is and therefore is covered by the policy, and what a record is not and therefore is not included.

Sections of the Model Policy: Policy statement

This section of the Model Policy is designed to explain to the reader why the organisation is interested in good recordkeeping.

You may not need to change this section of the Model Policy.

If you do choose to change this section, think about the benefits good recordkeeping might bring to your organisation, such as:

- managing information assets efficiently and effectively;
- improving the organisation's accountability and transparency;
- supporting good decision-making by having ready access to government information; and
- meeting the organisation's legislative requirements.

Sections of the Model Policy: Laws and regulations

This section of the Model Policy is designed to make sure the reader understands the laws that affect the way that records are managed.

You **will** need to change this section of the Model Policy to reflect your country's laws and requirements.

The list of laws in this section of the Model Policy are examples of laws that many countries have in place that often have an impact on the way they manage their records. Your country may not have some of these laws, or may call them by another name. Make sure that you change this section so that it lists accurately the laws that you have in your own country that relate to keeping and managing records.

Sections of the Model Policy: Responsibilities

This section of the Model Policy is designed to assign responsibilities for recordkeeping tasks to various people throughout the government or the organisation.

You may not need to change this section of the Model Policy.

If you do choose to change this section, think about whose job it should be to make sure that records are well managed within your government. It is important to remember that, to some extent, everyone must take some responsibility for making sure that records are created and well managed.

Your decisions about where responsibility should be assigned will change depending on the scope of your policy (see the section on 'Scope' earlier in this document), and who is going to authorise your recordkeeping policy (see the section on 'Authorisation' later in this document).

If all parts of government are expected to comply with the policy, you may find that you do not need to make any changes to this part of the Model Policy. If the policy will apply only to your organisation, you may need to make some minor changes to this section, such as referring by title to the head of your organisation and specifying which senior officer will take on the roles described under the heading 'Senior corporate managers'.

It is important to note that, even if your policy will apply to only one organisation, it is likely that the national archives or its equivalent will still have a role to play. You may need to consult with the head of your government archives to talk further about how the archives can help your organisation with its recordkeeping responsibilities.

Sections of the Model Policy: Monitoring and review

This section of the Model Policy is designed to set a timetable to review the policy to make sure that it is working.

You may not need to change this section of the Model Policy.


If you do choose to change this section, think about how often the policy will be reviewed, and how much time the organisations covered by the policy should be given to put the policy in place. If government bodies will need a long time to put arrangements in place so that they can comply with the policy, you should set a review date after that period so that you can see if the policy is working as it was intended.

Sections of the Model Policy: Authorisation

This section of the Model Policy is designed to show that the policy has been approved at an appropriate senior level.

You **will** need to change this section of the Model Policy.

Who will authorise the policy is a key decision, and should be the first issue you decide before you make changes to the rest of the Model Policy. In particular, it will have an impact on the 'Scope' and 'Responsibilities' sections of your policy. It may not be possible to include all government bodies in the scope of your policy if you do not have a senior officer with whole-of-government responsibilities who will authorise the policy.



Once this decision has been made, you will need to change this section of the Model Policy so that it includes the correct title of the person authorising the policy, and the date they authorised it.

IMPLEMENTING YOUR RECORDKEEPING POLICY

No matter how well drafted your recordkeeping policy is, it will not have an impact unless you think about how you will implement it. Implementing any new policy requires good change management to ensure that the people affected understand how things will be different and what their new responsibilities are.

Consultation

When you are tailoring the Model Policy for your own country you may need to consult with staff throughout government or the organisation to which the policy will apply. This will be especially important if you are hoping to encourage a senior government official to authorise the policy and endorse it for use by the whole government. Consultation during the drafting process can also help others to feel that they 'own' the policy or have some stake in it. If others feel ownership of the policy, they are more likely to support and comply with it.

Senior management support

To be effective, your policy also needs to have senior management support. One way of demonstrating this is to have a senior officer sign and endorse the policy. Senior managers can also show their support for good recordkeeping by:

- allocating proper resources to records management tasks;
- ensuring that they take seriously any allegations of breaches of the policy or other recordkeeping rules; and
- taking account of the policy and referring to it in other relevant high-level documents, such as mission statements and corporate plans.

Staff awareness and training

You cannot expect staff to abide by a new policy if they do not know about the policy or what it says. You may need to make sure that all staff in the organisation receive a copy of the policy, perhaps in hardcopy, by email or in a staff newsletter. It may be appropriate to hold awareness or training sessions for staff to help them to understand the policy and what they need to do.

Other recordkeeping tools

A recordkeeping policy on its own will not achieve good recordkeeping. PARBICA's Recordkeeping Capacity Checklist outlines 10 key elements an organisation needs to manage its records well. These are:

- a records management policy;
- senior management support;
- assigned responsibilities for recordkeeping tasks;
- adequate training;
- recordkeeping procedures;
- an understanding of recordkeeping requirements;

- systems for accessing records;
- systems for deciding if and when records can be destroyed;
- secure records storage and handling; and
- performance measures for recordkeeping.

By adopting and adapting this Model Policy, organisations can take steps to achieve many of these requirements. The Recordkeeping Capacity Checklist can give you further guidance on how to meet these 10 requirements. You can find the Checklist at <http://www.parbica.org/Toolkit%20pages/ToolkitGuideline1.htm>.

ABOUT PARBICA AND THE *RECORDKEEPING FOR GOOD GOVERNANCE TOOLKIT*


Formed in 1981, the Pacific Regional Branch of the International Council on Archives (PARBICA) is a professional organisation that comprises government archives, non-government archival institutions and associations, and individual members representing more than 20 nations, states and territories in the North and South Pacific, including Australia, Hawaii and New Zealand.

PARBICA is one of 13 branches of the International Council on Archives, covering the most diverse and largest geographic area. Member nations and territories include:

- Australia
- Cook Islands
- Federated States of Micronesia
- Fiji
- French Polynesia
- Kingdom of Tonga
- New Caledonia
- New Zealand
- Niue
- Papua New Guinea
- Republic of Kiribati
- Republic of Nauru
- Republic of Palau
- Samoa
- Solomon Islands
- Tuvalu
- Vanuatu.


PARBICA's aims are to:

- establish, maintain and strengthen relations among archivists in the region and among institutions and professional organisations concerned with the custody and administration of archives;
- promote the preservation and protection of the archival heritage of the region;
- facilitate the use of archives through public education and improved access;
- stimulate and organise archival activities;
- provide and assist with formal and informal professional training; and
- cooperate with other agencies concerned with the documentation of human and natural history in order to benefit all humankind.



This Model Policy is the latest part of PARBICA's *Recordkeeping for Good Governance Toolkit*. The Toolkit has been produced by PARBICA to assist Pacific archivists to better equip their government agencies to improve the state of recordkeeping within their administrations.

PARBICA is constantly adding to the Toolkit, and forthcoming guidelines will help you with providing better access to your organisation's records and with making decisions about which records can be destroyed and which must be preserved for ongoing historical or accountability purposes. Check the PARBICA website regularly to see what new tools have been developed to help your organisation to keep good records for good governance.



The *Recordkeeping for Good Governance Toolkit* was produced by the Pacific Regional Branch of the International Council on Archives with assistance from the National Archives of Australia and AusAID.