State Records Authority of New South Wales

Standard: No. 2 Standard on records management programs

Approved April 1998
Revoked April 2004 and replaced by Standard No. 8

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Published 1998

Published by:

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ISBN 0-7313-8804-6

Standard for Records Management

Standard no 2

SR file no 96/92

Title of Standard

Standard on records management programs

Scope

The standard sets minimum requirements for public offices' records management programs and to establish principles to guide public offices in establishing and maintaining those programs

Application

This standard applies to public offices as defined in s.2 of the Archives Act, 1960. Following proclamation of the new State records legislation in 1999, the standard will continue to apply until it is reissued or replaced under the terms of that legislation.

Authority

Issued initially under Premier's Memorandum 98-16, June 1998.

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

Authorised

This standard was issued under the State Records Act by David Roberts, Director, State Records Authority of New South Wales, on 10 February 1999.

Executive summary

This standard was prepared for issue under new State records legislation, a key provision of which will require public offices to establish and maintain a records management program in conformity with standards and codes of best practice approved by the State Records Authority that is to be established under the legislation. Pending proclamation of the legislation, the standard is issued to establish principles to guide public offices in establishing and maintaining those programs and to enable public offices to prepare to meet their obligations under the new legislation.

The standard applies to public offices as defined in s.2 of the Archives Act, 1960. Following proclamation of the new State records legislation, the standard will continue to apply until it is reissued or replaced under the terms of that legislation.

This standard is part of a framework of standards and codes of best practice, supported by guidelines, training and other forms of advice and assistance, as summarised in the framework on the inside front cover of this standard.

This standard outlines nine principles which should be addressed by public offices when they establish a records management program. In short, these are:

- 1. **Identifiable:** the records management program should be identifiable from all other corporate programs.
- 2. **Supported by policy:** the records management program should be supported by corporate policy.
- 3. **Planned:** the records management program should be planned.
- 4. **Assigned:** formal responsibility for all aspects of the records management program should be appropriately assigned.
- 5. **Located:** the records management program should be appropriately located within the organisational structure of the public office.
- 6. **Organised:** records management operations and systems should be organised according to the needs and structure of the public office, the nature of its business and the prevailing technological and regulatory environments.
- 7. **Staffed with skilled people:** the records management program should be staffed by personnel with appropriate skills.
- 8. **Implemented:** the records management program should be implemented throughout the organisation.
- 9. **Measured:** the records management program should be regularly measured.

Each principle is stated and explained, and is followed by minimum compliance requirements. The requirements are followed by sources of further guidance relevant to the principle, where available. A compliance checklist forms an attachment to the standard to assist public offices and auditors in assessing their performance against these requirements.

Besides their formal role, the principal purpose of this and other standards, codes of best practice and other forms of guidance is to promote recordkeeping best practice across the New South Wales public sector. This means that the building of systematic

recordkeeping into business processes and systems should be done in such a way as to support and not hinder people's work.

Introduction

Background

New State records legislation will require public offices to establish and maintain a records management program in conformity with standards and codes of best practice approved by the State Records Authority that is to be established under the legislation. This standard was prepared for issue under that legislation. Pending its proclamation, the standard is issued to promote best practice in recordkeeping and to enable public offices to prepare to meet their obligations under the legislation.

The standard was issued as an exposure draft in May 1996 and revised to take account of public offices' comments. The resulting final draft was reviewed by the Chief Executives' Committee and approved by the board of the Archives Authority in December 1997.

Purpose

The purpose of this standard is to set minimum requirements for public offices' records management programs and to establish principles to guide public offices in establishing and maintaining those programs.

Application

This standard applies to public offices as defined in s.2 of the *Archives Act*, 1960. Following proclamation of the new State records legislation, the standard will continue to apply until it is reissued or replaced under the terms of that legislation.

Framework of standards and codes of best practice

The new State records legislation will permit the State Records Authority (to be established under the legislation) to approve standards and codes of best practice for records management by public offices. This standard is one of the first in a series that will be issued progressively in preparation for, and subsequently under, the legislation. The standards and codes of best practice are supported by guidelines, training and other forms of advice and assistance. The elements in this framework are summarised graphically on the inside front cover of this standard and are described in more detail in the following paragraphs.

Standards

In this framework, standards will be mandatory under the new legislation and are intended to function as minimum performance standards, measurable by public offices and auditors. They will be supported by mechanisms for monitoring and reporting compliance. They are designed to focus on outcomes, rather than specific practices.

Pending passage and proclamation of the legislation, there is no formal requirement for monitoring and reporting compliance with this standard. Public offices should expect their compliance with the standard to be assessed in any case where the quality of their recordkeeping is called into question.

Codes of best practice

These codify and describe best practice, functioning as a benchmark against which an organisation can measure its practices and systems. While it is not intended that these

be subject to formal compliance monitoring under the new legislation, failure to comply would leave a public office open to criticism in an investigation where recordkeeping practices were an issue.

Guidelines and manuals

These represent practical guidance in support of the standards and codes of best practice.

Training and support

These are a means of providing further guidance and assistance to public offices and their staff for practical application. They include the Authority's training courses and records storage and related consultancy services offered by the Government Records Repository.

Structure

A public office should establish and maintain its records management program in accordance with a number of principles. In short, a records management program should be:

- 1. identifiable
- 2. supported by policy
- 3. planned
- 4. assigned
- 5. located
- 6. organised
- 7. staffed with skilled people
- 8. implemented, and
- 9. measured.

This standard is arranged according to these principles. Each principle is stated and explained and is followed by minimum compliance requirements. The requirements are followed by sources of further guidance relevant to the principle, where available. A compliance checklist forms an attachment to the standard to assist public offices and auditors in assessing performance against these requirements.

For more information

For further information about recordkeeping standards, codes of best practice and associated guidance, contact:

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Definitions

For the purposes of this standard the following definitions apply. The definitions are taken from Australian Standard AS 4390—1996: *Records Management*, Part 1: *General*, except definitions marked *.

Accountability

The principle that individuals, organisations and the community are required to account to others for their actions. Organisations and their employees must be able to account to appropriate regulatory authorities, to shareholders or members, and to the public to meet statutory obligations, audit requirements, relevant standards and codes of practice, and community expectations.

Business activity

Umbrella term covering all the functions, processes, activities and transactions of an organisation and its employees. Includes public administration as well as commercial business.

Corporate Governance*

Corporate Governance is the system or process by which companies are directed and controlled. Corporate Governance is concerned with the way that the directors control the activities of the company and ensure that the managers to whom they delegate many functions are accountable. A good system of Corporate Governance should enable responsibility to be clearly defined. Directors....have responsibility for the governance of their companies. (Bryce Hardman, 'Corporate Governance — A Practical Guide for Directors and Secretaries', Australian Company Secretary (July 1996))

Documents

Structured units of recorded information, published or unpublished, in hard copy or electronic form, and managed as discrete units in information systems.

Evidence

Information that tends to prove a fact. Not limited to the legal sense of the term.

Function

The largest unit of business activity in an organisation or jurisdiction.

Public office*

Any department, office, commission, board, corporation, agency, or instrument of any kind, performing any functions of any branch of the Government of New South Wales, and any office or body proclaimed under subsection (3) to be a public office for the purposes of this Act, but does not include any local authority that has not been proclaimed as aforesaid. (*Archives Act, No. 46 of 1960*, section 2(1))

Recordkeeping

Making and maintaining complete, accurate and reliable evidence of business transactions in the form of recorded information.

Recordkeeping systems

Information systems which capture, maintain and provide access to records over time.

Records

Recorded information, in any form, including data in computer systems, created or received and maintained by an organisation or person in the transaction of business or the conduct of affairs and kept as evidence of such activity.

Records continuum

The whole extent of a record's existence. Refers to a consistent and coherent regime of management processes from the time of the creation of records (and before creation, in the design of recordkeeping systems), through to the preservation and use of records as archives.

Records management

The discipline and organisational function of managing records to meet operational business needs, accountability requirements and community expectations.

Transaction

The smallest unit of business activity. Uses of records are themselves transactions.

The Principles

1 Identifiable

The records management program should be identifiable from all other corporate programs.

Explanation

The records management program consists of a unique group of activities. Each public office should establish and maintain a records management program for performing these activities that is identifiable from other corporate programs through policy statements, corporate planning documents, the allocation of resources and the assignment of responsibility.

Minimum compliance requirements

A compliant public office will be able to demonstrate that the records management program is:

- 1. distinguished from all other programs by having a separate policy statement adopted at the corporate level
- 2. included as a result area in corporate plans
- 3. allocated appropriate resources to enable the program to be established and maintained
- 4. the responsibility of a single identified senior manager.

2 Supported by policy

The records management program should be supported by corporate policy.

Explanation

Each public office should develop and implement a records management policy. The records management policy should be documented, authorised and promulgated throughout the public office. It should encompass all aspects of recordkeeping and records management, including recordkeeping in the electronic environment.

As the Australian Standard notes, the objective of the policy should be '...the creation and maintenance of records with appropriate evidential characteristics.' (AS 4390—1996: *Records Management*, Part 2: *Responsibilities*, Clause 5.1.1)

The policy should '…identify the chief executive officer or a senior management delegate who shall have defined authorities for compliance to external recordkeeping standards, which may or may not include legislative requirements, and be responsible for internal practices.' (AS 4390—1996: *Records Management*, Part 2: *Responsibilities*, Clause 5.1.2) The assignment of responsibility for the records management program is discussed further under Principle 4.

Minimum compliance requirements

A compliant public office will be able to demonstrate that a records management policy:

- 1. exists in the form of one or more identifiable policy statements
- 2. is authorised at an appropriate senior level
- 3. is promulgated throughout the public office
- 4. is known by staff
- 5. is reviewed at regular intervals
- 6. is addressed in the public office's operating procedures, business rules, manuals and employees' *Code of Conduct*
- 7. identifies any legislation, standards, codes of best practice or other external requirements to which the public office is subject that affect recordkeeping
- 8. is consistent with ethical standards which are binding upon the occupations or professions of those employed by the public office
- 9. identifies the senior manager having defined authorities for compliance to external recordkeeping standards and responsible for internal practices
- 10. defines the authorities, responsibilities, roles and interrelationships of all personnel who manage or perform recordkeeping processes.

For further guidance

Australian Standard AS 4390—1996: *Records Management*, Part 2: *Responsibilities*, Clauses 5.1.1 & 5.1.2

3 Planned

The records management program should be planned.

Explanation

Like any other corporate program, a records management program should be planned, managed and monitored. It should have its own documented plans, developed in accordance with standard requirements for such documents operating in the public office. A records management program will have both a short-term operational plan and a long-term strategic plan.

The program should also be represented in corporate-level planning documentation as a result area, with outcomes, strategies, planned improvements and initiatives, key staff and performance indicators.

Minimum compliance requirements

A compliant public office will be able to demonstrate that a records management program:

- 1. has a documented operational plan
- 2. has a documented strategic plan
- 3. is incorporated into the public office's corporate-level planning documentation.

4 Assigned

Formal responsibility for all aspects of the records management program should be appropriately assigned.

Explanation

Formal responsibility for the records management program should be assigned to an appropriate senior management delegate. This person will perform the role of Corporate Records Manager, which is to:

- establish records management policies for the organisation as a whole
- establish corporate standards for recordkeeping and records management
- measure performance of business units and workgroups against those standards
- provide consulting services to business units
- develop corporate electronic records management strategies
- work with other managers of information resources to develop a coherent information architecture across the organisation, and
- work with other accountability stakeholders, including auditors, FOI officers and executive management, to ensure that recordkeeping systems support organisational and public accountability.

This role should be distinguished from that of operational, business unit or workgroup level records managers and recordkeeping system administrators, who are assigned identifiable responsibilities for operational records management activities, systems and services, but often carry these out among a range of other duties.

In large organisations, the Corporate Records Manager position should be a dedicated position. In smaller organisations, the position may have other responsibilities as well.

In particular, public offices should consider the relationship between the role of Corporate Records Manager and that of Chief Information Officer (CIO). Much of the Corporate Records Manager's role in relation to records management across the organisation parallels that of the CIO in relation to the organisation's information resources as a whole. In addition to the role described above, the Corporate Records Manager should form part of the information management team and contribute to the CIO's work of planning and managing the public office's information resources, regardless of the organisational location of the records management program. In smaller organisations, it may be appropriate to assign the role of Corporate Records Manager to the CIO.

Depending on the size of the organisation, the Corporate Records Manager should be a qualified recordkeeping professional (see Principle 7) or should have immediate access to advice from such a professional.

The responsibilities of all employees in relation to recordkeeping should also be assigned and promulgated. The fundamental recordkeeping responsibilities of public sector employees have already been articulated in other places. The Ombudsman's Good Conduct and Administrative Practice: Guidelines for Public Authorities and Officials define public officials' recordkeeping responsibilities. The New South Wales Public Sector Code

of Conduct requires that, in the performance of their duties, public officials should '... maintain adequate documentation to support any decision made'.

To take employees' recordkeeping responsibilities beyond the fundamental level, it is necessary to incorporate them into policies, business rules and procedures, build them into the design of jobs and incorporate them in position profiles and descriptions. Employees need to be educated about their responsibilities.

Minimum compliance requirements

A compliant public office will be able to demonstrate that:

- 1. responsibility for the records management program is assigned to an appropriate senior management delegate, designated the Corporate Records Manager
- 2. operational records management responsibilities are formally assigned at appropriate levels
- 3. the recordkeeping responsibilities of individual employees have been documented and communicated to all staff.

For further guidance

Australian Standard AS 4390—1996: *Records Management*, Part 2: *Responsibilities*, Clauses 5 and 8

IM&T Blueprint Memorandum Number 3.2: Chief Information Officer (CIO), NSW Office of Information Technology, 1997

IM&T Guideline: Chief Information Officer (CIO), NSW Office of Information Technology, 1997

Good Conduct and administrative practice: guidelines for public authorities and officials, NSW Ombudsman, section 2.3.10, pp. 2.7-2.8

5 Located

The records management program should be appropriately located within the organisational structure of the public office.

Explanation

The records management program should be appropriately located in the organisational structure to support the key objectives of the program and to perform its organisation-wide role effectively. Increasingly this will involve location with either:

- the informational management area, under the executive direction of the Chief Information Officer, or
- the 'Corporate Governance' or similar accountability-oriented area

rather than with the corporate services area.

Regardless of its organisational location, staff of the records management program should develop partnerships and other links with other key information management and accountability stakeholders in the organisation, such as information management and technology specialists, FOI Coordinators, auditors, lawyers, archivists and librarians.

Minimum compliance requirements

A compliant public office will be able to demonstrate that the records management program:

- 1. is organisationally located in the most appropriate way to support its key objectives and to perform its organisation-wide role effectively
- 2. has identified and developed relationships with other key information management and accountability stakeholders in the organisation.

For further guidance

Australian Standard AS 4390—1996: Records Management, Part 2: Responsibilities

6 Organised

Records management operations and systems should be organised according to the needs and structure of the public office, the nature of its business and the prevailing technological and regulatory environments.

Explanation

Many models exist for organising records management operations and services. These range from traditional centralised registry systems to highly devolved workgroup-level systems. In determining a model which best suits it, a public office should consider such issues as its organisational structure, the nature of its business, its operating and technological environment, who needs to use which types of records, security and confidentiality requirements across the organisation or within particular areas, geographical spread and accommodation.

Minimum compliance requirements

A compliant public office will be able to demonstrate that:

- 1. an organisational model for the records management program has been chosen for identified and rational reasons
- 2. the organisational basis of the program is documented and known to staff.

7 Staffed with skilled people

The records management program should be staffed by personnel with appropriate skills and knowledge.

Explanation

A public office should ensure that it has people with the pool of skills necessary to achieve the records management program's key objectives. This means appointing suitably skilled staff to positions exercising records management responsibilities throughout the organisation and monitoring and developing the skills of existing and future staff.

Sources of education and training in records management include graduate and postgraduate university courses, TAFE courses, short course training offered by the Archives Authority and other organisations and a variety of continuing education opportunities.

The Corporate Records Manager should have relevant qualifications or immediate access to advice from someone with such qualifications (see Principle 4). These may include:

- postgraduate qualifications in the discipline of recordkeeping
- extensive industry experience
- eligibility for professional membership of relevant professional bodies
- · experience implementing organisation-wide policies and standards, and
- appropriate managerial competencies and skills.

National Competency Standards for records and archives have been developed. Once these are finalised and endorsed nationally, the Archives Authority expects them to provide the basis for defining competencies in records management in the New South Wales Government.

Minimum compliance requirements

A compliant public office will be able to demonstrate that:

- 1. the Corporate Records Manager has relevant qualifications or has immediate access to advice from someone with such qualifications
- 2. other records management staff have qualifications appropriate to their positions
- 3. professional development for records management staff is encouraged in corporate policy and practice
- 4. records management staff are capable of performing the full range of tasks associated with their positions
- 5. records management staff are familiar with current best practice
- 6. a skills audit of records management staff is performed at regular intervals
- 7. a training needs analysis is performed at regular intervals

- 8. a staff development and training program is in place and available to records management and other staff
- 9. selection criteria for records management positions are reviewed at regular intervals to ensure currency and compliance with best practice.

8 Implemented

The records management program should be implemented throughout the organisation.

Explanation

Implementing a records management program involves a series of tasks and actions, many of which are specified in this standard. Public offices should implement their programs systematically under the direction of a manager assigned this responsibility. It may be helpful to form a Steering Committee with representatives from major business units to oversee the implementation of the program across the organisation.

Minimum compliance requirements

In addition to meeting the other requirements in this standard, a compliant public office will be able to demonstrate that:

- 1. the authorities, responsibilities and interrelationships of all employees who manage or perform recordkeeping processes are defined
- 2. business rules and standard operating procedures state the recordkeeping responsibilities of identified positions and/or of people performing identified tasks in business processes
- 3. records management systems and procedures have been developed and promulgated
- 4. corporate strategies for making and keeping records in the electronic environment are developed and implemented
- 5. the success of the implementation has been assessed following its completion.

9 Measured

The records management program should be regularly measured.

Explanation

A public office needs to measure the performance of its records management program both to ensure that it is effective and to meet external reporting requirements. This measurement can include:

- regular program-based monitoring and reporting against plans and objectives
- formal program evaluations and operational audits
- auditing compliance with standards and codes of best practice issued by Government
- auditing compliance with other external requirements affecting recordkeeping, and
- measuring the satisfaction of customers of records management services.

New State records legislation will require each public office to make arrangements with the State Records Authority (to be established under the legislation) for the monitoring by the Authority of the public office's records management program and to report, in accordance with arrangements made with the Authority, on the implementation of the program.

Minimum compliance requirements

A compliant public office will be able to demonstrate that:

- 1. the performance of the records management program is regularly reviewed and assessed against its plans and objectives
- 2. mechanisms have been established to monitor organisation-wide compliance with standards and codes of best practice issued by Government and with other external requirements affecting recordkeeping
- 3. the results of reviews are documented and any corrective action required is taken.

For further guidance

Australian Standard AS 4390—1996: Records Management, Part 3: Strategies, Appendix C: Check List for Performance Testing of Records Management Systems

Records Management Checklist for Local Government, Archives Authority of New South Wales, 1993

Compliance checklist

1 I dentifiable 1.1 Does the records management program have a Yes 🗆 No separate policy statement adopted at the corporate level? 1.2 Is the records management program included as a Yes 📮 No result area in corporate plans? 1.3 Has the records management program been allocated Yes 📮 No appropriate resources to enable it to be established and maintained? 1.4 Is the records management program the responsibility Yes No of a single identified senior manager? 2 Supported by policy 2.1 Does the records management policy exist in one or Yes 📮 No more identifiable statements? 2.2 Is the records management policy authorised at an Yes 📮 No appropriate senior level? 2.3 Has the records management policy been promulgated Yes 📮 No throughout the public office? 2.4 Is the records management policy known by the staff Yes 📮 No of the public office? 2.5 Is the records management policy reviewed at regular Yes 📮 No intervals? 2.6 Is the records management policy addressed in the Yes 📮 No public office's operating procedures, business rules, manuals and employees' Code of Conduct? 2.7 Does the records management identifies any Yes 📮 No legislation, standards, codes of best practice or other external requirements to which the public office is subject that affect recordkeeping? 2.8 Is the records management policy consistent with Yes 🗆 No ethical standards binding upon the occupations and professions of those employed by the public office? 2.9 Does the records management policy identify the Yes 📮 No

2.10

responsible for internal practices?

senior manager having defined authorities for

Does the records management policy define the

compliance to external recordkeeping standards and

No

Yes

authorities, responsibilities and interrelationships of all personnel who manage or perform recordkeeping processes?

Planned			
Does the records management program have a documented operational plan?		Yes 🗆	No
Does the records management program have a documented strategic plan?		Yes 🗖	No
Is the records management program is incorporated into the public office's corporate-level planning documentation?		Yes 🗖	No
Assigned			
Is the responsibility for the records management program assigned to an appropriate senior management delegate?		Yes 🗖	No
Are operational records management responsibilities formally assigned at appropriate levels?		Yes 🗖	No
Are recordkeeping responsibilities of individual employees documented and communicated to all staff?		Yes 🗖	No
Located			
Is the records management program organisationally located in the most appropriate way to support its key objectives and to perform its organisation-wide role effectively?		Yes 🗖	No
Have the relationships with other key information management and accountability stakeholders in the organisation been identified and developed?		Yes 🗖	No
Organised			
Has an organisational model for the records management program been used?		Yes □	No
Is the organisational basis for the records management program documented and known to staff?		Yes 🗖	No
Staffed with skilled people			
Does the Corporate Records Manager have relevant qualifications or immediate access to advice from someone with such qualifications?		Yes 🗖	No
	Does the records management program have a documented operational plan? Does the records management program have a documented strategic plan? Is the records management program is incorporated into the public office's corporate-level planning documentation? Assigned Is the responsibility for the records management program assigned to an appropriate senior management delegate? Are operational records management responsibilities formally assigned at appropriate levels? Are recordkeeping responsibilities of individual employees documented and communicated to all staff? Located Is the records management program organisationally located in the most appropriate way to support its key objectives and to perform its organisation-wide role effectively? Have the relationships with other key information management and accountability stakeholders in the organisation been identified and developed? Organised Has an organisational model for the records management program been used? Is the organisational basis for the records management program documented and known to staff? Staffed with skilled people Does the Corporate Records Manager have relevant qualifications or immediate access to advice from	Does the records management program have a documented operational plan? Does the records management program have a documented strategic plan? Is the records management program is incorporated into the public office's corporate-level planning documentation? Assigned Is the responsibility for the records management program assigned to an appropriate senior management delegate? Are operational records management responsibilities formally assigned at appropriate levels? Are recordkeeping responsibilities of individual employees documented and communicated to all staff? Located Is the records management program organisationally located in the most appropriate way to support its key objectives and to perform its organisation-wide role effectively? Have the relationships with other key information management and accountability stakeholders in the organisation been identified and developed? Organised Has an organisational model for the records management program been used? Is the organisational basis for the records management program documented and known to staff? Staffed with skilled people Does the Corporate Records Manager have relevant qualifications or immediate access to advice from	Does the records management program have a documented operational plan? Does the records management program have a documented strategic plan? Is the records management program is incorporated into the public office's corporate-level planning documentation? Assigned Is the responsibility for the records management program assigned to an appropriate senior management delegate? Are operational records management responsibilities formally assigned at appropriate levels? Are recordkeeping responsibilities of individual employees documented and communicated to all staff? Located Is the records management program organisationally located in the most appropriate way to support its key objectives and to perform its organisation-wide role effectively? Have the relationships with other key information management and accountability stakeholders in the organisation been identified and developed? Organised Has an organisational model for the records management program been used? Is the organisational basis for the records management program documented and known to staff? Staffed with skilled people Does the Corporate Records Manager have relevant qualifications or immediate access to advice from

7.2	Are other records management staff appropriately qualified for their positions?	Yes 🗖	No
7.3	Is professional development encouraged through corporate policy and practice?	Yes 🗖	No
7.4	Are records management staff capable of performing the full range of tasks associated with their positions?	Yes 🗖	No
7.5	Are records management staff familiar with current best practice?	Yes 🗖	No
7.6	Is a skills audit of records management staff performed at regular intervals?	Yes 🗖	No
7.7	Is a training needs analysis is performed at regular intervals?	Yes 🗖	No
7.8	Is a staff development and training program in place and available to records management and other staff?	Yes 🗖	No
7.9	Are selection criteria for records management positions reviewed at regular intervals to ensure currency and compliance with best practice?	Yes 🗖	No
8	Implemented		
8.1	Are the authorities, responsibilities and interrelationships of all employees who manage or perform recordkeeping processes defined?	Yes □	No
8.2	Do business rules and standard operating procedures state the recordkeeping responsibilities of identified positions and/or of people performing identified tasks in business processes?	Yes 🗖	No
8.3	Have records management procedures been developed and promulgated?	Yes 🗖	No
8.4	Are corporate strategies for making and keeping records in the electronic environment developed and implemented?	Yes 🗖	No
8.5	Has the success of the implementation been assessed following its completion?	Yes 🗖	No
9	Measured		
9.1	Is the records management program regularly reviewed and assessed against its plans and objectives?	Yes 🗖	No
9.2	Have mechanisms been established to monitor organisation-wide compliance with standards and codes of best practice issued by Government and with	Yes 🗖	No

other external requirements affecting recordkeeping?

9.3 Are the results of reviews documented and any required corrective action taken?

☐ Yes ☐

No