



Australian Government



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# **Guidelines for using General Records Authority (31) for source (including original) records after they have been copied, converted or migrated**

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## 1. Executive summary

These guidelines supplement the *General Records Authority (31) - GRA (31) - for source (including original) records after they have been copied, converted or migrated*. The guidelines are developed to assist agencies implementing the GRA (31). The September 2012 revision of the guidelines updates hyperlinks in the Guidelines to referred resources: No other substantive change has been made .

The GRA (31) covers all agency records created on or after 1 January 2000 and all pre-2000 temporary records, subject to some exclusions and conditions and permits destruction of in-scope source records, including original records following successful copying, conversion or migration.

The Authority relates to records, including original records that have been copied, converted or migrated resulting in two or more records, at minimum the original and a reproduction.

The original record is known as the source record and continues to exist after a reproduction has been created.

These guidelines provide:

- the basis for agencies to decide whether the Authority allows destruction of source records after they have been copied, converted from one form to another or migrated from one system to another; and
- practical information about the use of the Authority. This includes issues for consideration, a flowchart and checklist, and related information on reproduction projects and programs.

These guidelines emphasise that reproductions replacing source records become agency records and they must be managed accordingly.

When planning digitisation projects which include records identified as Retain as National Archives (RNA) or Retain Permanently (RP), you must agree format standards and verification procedures with the National Archives of Australia before commencing your project. This is to ensure that your digital images can be preserved by the National Archives for future government and public access purposes. Please refer to the National Archives of Australia guidance on [Digitising accumulated physical records](#).

## 2. Key terms used

**Intrinsic value** relates to qualities or characteristics of a record that normally requires the record to remain in its original form. For example, a copy of an artwork would have a much lower intrinsic value than the original. The intrinsic value may also relate to the record's relationship to a significant person, event or place, for example a document signed by a Prime Minister. The intrinsic value of a record may be separate from its information value and may be lost if replaced by a reproduction. Refer to Section 8 for more details.

### Records actions:<sup>1</sup>

- **Copied** – producing an identical copy within the same type of medium (paper/microfilm/electronic) or the production of backup copies of electronic records. Where the record is being copied, the same type of medium this would

<sup>1</sup> Adapted from: Australian Standard AS ISO 15489-2002, Records Management

entail a record being copied from paper to paper, microfilm to microfilm, etc. Where a back-up copy of the record is being created, it can also be made on a different kind of electronic medium.

- **Converted** – changing records from one medium to another or from one format to another. Conversion involves a change of the format of the record but ensures that the record retains the identical primary information (content). Examples include microfilming or digital imaging of paper records, and a change to character sets.
- **Migrated** – the process of systematically moving records from one system to another, while maintaining the records' authenticity, integrity, reliability and useability. The purpose of migration is to preserve the integrity of the records and to retain the ability to retrieve, display and otherwise use them. Migration usually occurs when hardware and/or software becomes obsolete or to move electronic records from one file format to another.

**Note:** for the definitions of any other terms mentioned within the Authority or these guidelines, please see the National Archives of Australia Glossary, available from the National Archives website.

### 3. How to use the Authority in your agency

The decision to use the Authority in your agency should form part of your agency's records and information management framework. A documented and planned approach should be taken when undertaking any copying, conversion or migration project.

Before committing to a records conversion or migration project, there are two fundamental questions to be considered:

- are the records covered by the Authority?
- can your agency meet the requirements for use of the Authority?

The answers to these questions may fundamentally affect the business case for proceeding.

There are then three major questions to consider when using this Authority:

- how will your agency manage the source record?
- how will your agency manage the reproduction (the record)?
- how will your agency manage reproduction programs?

If you are not in a senior records and information management role, please consult your agency information management or records management specialists before applying the Authority.

If you are unsure whether this Authority is appropriate for your records migration, or you are unsure whether the intended migration program meets the requirements of the Authority please contact National Archives to discuss.

### 3.1 Applicability to source records

#### a. Is your agency the 'owner' or the agency responsible for the source records?

If your agency has collected or is managing the source records from another agency or on another agency's behalf, you need to obtain their permission to migrate or convert records, or to destroy their source records.

#### b. Does your agency consider the source record to have intrinsic value?

Intrinsic value relates to qualities or characteristics of a record that normally requires the record to remain in its original format. If a record has intrinsic value, your agency needs to decide if a reproduction would have the same intrinsic qualities or characteristics of the original record. Please refer to the definition of intrinsic value in Section 2 and further details on determining intrinsic value in Section 8.

Agencies are advised to discuss any intended migration of records with intrinsic value or suspected intrinsic value with National Archives prior to commencing.

The Authority does not allow destruction of source records that have intrinsic value and are categorised as Retain as National Archives (RNA) or Retain Permanently (RP), or meet the criteria of RNA in *"Why Records are Kept: Directions in Appraisal"* (Exclusion g). Agencies are to avoid a migration process which has the potential to damage the intrinsic value of these source records.

#### c. Are the records audio visual records?

The Authority does not allow the destruction of any audio visual records that are not identified as temporary value records under a current Records Authority issued by the National Archives of Australia (Exclusion b in the Authority). In other words, only temporary value audio visual records are covered, irrespective of their age. Audio visual records that are identified as RNA or RP, or have not been sentenced (and hence are potentially RNA) are out of scope and destruction is not authorised. This new exclusion is based on experience gained with such records. If you are undertaking a migration of audio visual records please discuss your approach with National Archives before commencing.

This is a new exclusion. Some destruction which was permitted under the previous Authority will not be permitted after the date of effect of the new Authority. You will need to seek the authorisation of the National Archives to destroy non-temporary audio visual records on a case by case basis.

#### d. Is there any relevant legislation that specifies that the original form of records is required?

Some legislation requires records to be kept in their original format. For example, there may be legislation requiring some records to be kept in paper format so as to include the original signature (wet signature). If you are unsure about the required format for the records, please obtain and retain advice from your agency's legal advisors before proceeding.

#### e. What happens if there is a disposal freeze on the records?

A records disposal freeze prevents the destruction of a group of records. In most cases<sup>2</sup>, after copying, conversion or migration the source record may be replaced by

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<sup>2</sup> At time of issue of the GRA 31, source records subject to the disposal freeze named *"Post Cornwell Case Litigation - Processing of Additional Claims"* are a specific exclusion. These source records are also excluded by exclusion (e) covering records reasonably likely to be required as evidence.

the reproduction as the business record. If this occurs, the reproduction becomes the business record and will be subject to the disposal freeze rather than the source record. At this stage, your agency may apply the Authority to dispose of the source records provided that the terms of the disposal freeze do not specifically exclude application of the Authority.

Agencies are advised to contact the National Archives if they have questions or concerns regarding any records disposal freezes in force at the time they intend to use the Authority.

**f. Are the records reasonably likely to be required as evidence for a current or future judicial proceeding?**

*Exclusion (e)*

Where the agency knows it is reasonably likely that a source record may be required as evidence in:

- a current judicial proceeding (this includes a legal proceeding or inquiry); or
- a future judicial proceeding that will be commenced or will likely be commenced, you must conduct a risk assessment before the source record is destroyed. The risk assessment should consider:
  - the agency's business;
  - cost/benefit analysis to retain or destroy the source record;
  - public perception that may arise from destruction of the source record; and
  - whether any current or future copying, conversion or migration of the source record will impact the admissibility of the record as evidence.

You should consult your agency's legal advisor as part of this process.

Where the agency determines that the source record is reasonably likely to be required, the source record must not be destroyed until after the judicial proceeding has been finalised.

The agency should regularly review the status of source records retained as a result of risk assessments.

**g. Are the records reasonably likely to be subject to a current application for access under Freedom of Information Act, Archives Act or other legislation?**

*Exclusion (f)*

Where the agency knows it is reasonably likely that a source record may be subject to a current application for access under the *Freedom of Information Act 1982*, *Archives Act 1983* or other legislation, you must conduct a risk assessment before the source record is destroyed.

The risk assessment should consider:

- the agency's business;
- cost/benefit analysis to retain or destroy the source record; and
- public perception that may arise from destruction of the source record.

You should consult your agency's legal advisor as part of this process.

Where the agency determines that the source record is reasonably likely to be subject to a current application for access, the source record must not be destroyed until after the application for access has been finalised.

The agency should regularly review the status of source records retained as a result of risk assessments.

#### **h. Is there a business need to keep the source record?**

You will need to liaise with the business area responsible for the records to ascertain if there is a need to keep the records in their original form. It should be kept in mind that keeping copies of records can be expensive regardless of whether they are hardcopy or softcopy.

The Authority permits destruction of source records that have never been the principal format of the record used or relied on in the normal course of business. For example, where inward paper is routinely scanned on receipt for processing in digital format and the paper then plays no further part in business processes.

Examples of reasons why some records may need to be kept in original form:

- a special legislative requirement relating to the business area;
- business rules that indicate a hard copy record must be kept for annotation; or
- possible re-use of graphic materials in the future.

### **3.2 Managing the reproductions as agency records**

Reproductions must be at least functionally equivalent to the source records for business and legal purposes and must be managed as official agency records if the intention is to destroy the source records (Condition b of the Authority).

#### **a. Have the reproductions been captured with sufficient contextual information to ensure they are validated as records?**

Contextual information or metadata allows records to be understood and facilitates access and retrieval. It is important that the reproductions can be validated as records by their metadata (data describing the record), whether they are being managed in a records management system, by another IT system or in a shared drive.

#### **b. Can the reproductions be relied upon as records of the agency's business?**

To ensure the reproduction is a reliable substitute for the source record, you must be satisfied that the reproduction is:

- authentic – the reproduction process is controlled and documented;
- complete – the reproduction has been produced using quality assurance measures that ensure there is no alteration, and has all the information as contained in the source record;
- accessible – the reproduction is available and readable over the life of the record; and

- useable – the reproduction is able to serve the same business purpose as the source record.

It is desirable to maintain any evidence of audit logs, testing of equipment and procedures and any pre- or post-reproduction testing. These will enable your agency to demonstrate that the reproduction is functionally equivalent to the source record if required.

**c. Are there appropriate strategies implemented to ensure reproductions are retained and remain accessible for as long as required?**

Records that have been created by copying, conversion or migration will inherit the access, destruction or transfer arrangements that apply to the source records. However, your agency will need to replace its information systems at some point. This will impact on records, since some records will be required beyond the life of the system they are currently managed by or stored in.

To ensure access to these records for as long as they are required by the agency, appropriate migration strategies need to be implemented. The systems may also need to be included in any disaster recovery strategies to ensure that the records remain secure and accessible. Plans for replacement or upgrade projects affecting these systems need to be discussed with the business and IT area.

**d. Have steps been taken to document the destruction of the source records?**

Document your actions so that it is clear that source records destruction has been carried out. This documentation can be at quite a high level such as making a note in a destruction register to confirm that the source record no longer exists. For migration projects, appropriate documentation may include a final migration report. If your agency is undertaking a reproduction project, source records should not be destroyed until quality assurance processes are satisfied.

**e. Maintenance of reproductions as agency records**

Agencies must ensure that reproductions are managed as agency records. This should include ensuring that:

- the reproduction is retained for the same retention period that applied to the source record;
- the reproductions are kept in accordance with relevant records management standards and guidelines promulgated by the National Archives for Australian Government use;
- the reproductions are accessible and useable over time;
- the reproductions are included in any data back-up processes employed by the agency;
- the reproductions are protected to avoid breaches in security and privacy as well as to ensure they are not vulnerable to alteration or deletion;
- procedures are in place to identify and prevent risk events as well as to check that records have not been compromised;
- authorisation is sought from the National Archives for the destruction or transfer of any records that are not covered by this Authority or other records authorities; and
- arrangements to provide public access to the reproductions should be the same as those that applied to the source records.

#### **f. Business systems and reporting of the reproduction of Retain as National Archives (RNA) records**

Agencies should ensure that they can maintain the records in an accessible location and readable condition for as long as required. This is particularly important where the reproductions are digital. In most cases, this is best accomplished by a business system which has the necessary controls and detailed records descriptors.

The agency must advise the National Archives as early as possible if, for some reason, it can no longer maintain the systems that support RNA records.

Where the records that have been reproduced are eligible for transfer to the National Archives as RNA, they should be managed by an agency system with adequate controls.

### **3.3 Managing reproduction projects or processes**

When planning digitisation projects for records identified as RNA or RP, you must agree format standards and verification procedures with the National Archives before commencing your project. This is to ensure that your digital images can be preserved by the National Archives for future government and public access purposes. Please refer to the National Archives guidance on [Digitising accumulated physical records](#).

Any copying, conversion or migration project carries a certain amount of risk. There is the chance that records could have their content and structure significantly altered, which could affect the functional equivalence of the reproduction with the source record. Due to this risk, reproduction projects or processes should be well planned and implemented to ensure the reproduction is appropriate for business purposes.

Agencies should document the processes used to reproduce records. By documenting this process, the reproductions can be demonstrated to be functionally equivalent to the source records. As such, they can carry further weight as admissible evidence.

Agencies should ensure that:

1. Procedures for the process of copying, conversion or migration (for example scanning procedures) are comprehensive, including quality assurance and quality control;
2. Records intended to be reproduced are not missed. Decisions not to copy, convert or migrate certain records or metadata elements need to be documented. Corrections to errors and defects in the reproductions or any data clean up performed should be documented;
3. The reproduction process selected is suitable for the nature of the source records with considerations made for essential characteristics;
4. The process selected does not damage the intrinsic value of RNA or RP source records (Exclusion a in the Authority); and
5. Procedures address how the reproductions will be managed over time.

### **3.4 Transfers of RNA records to National Archives**

Where migration programs are being conducted as a project, a transfer of a copy of the migrated RNA records to National Archives may be appropriate as a project deliverable. Please discuss the proposed transfer, including the format and transfer

medium with National Archives. In certain circumstances, such as records with intrinsic value, it may also be appropriate to transfer the source records to National Archives.

#### **4. Contacting the National Archives**

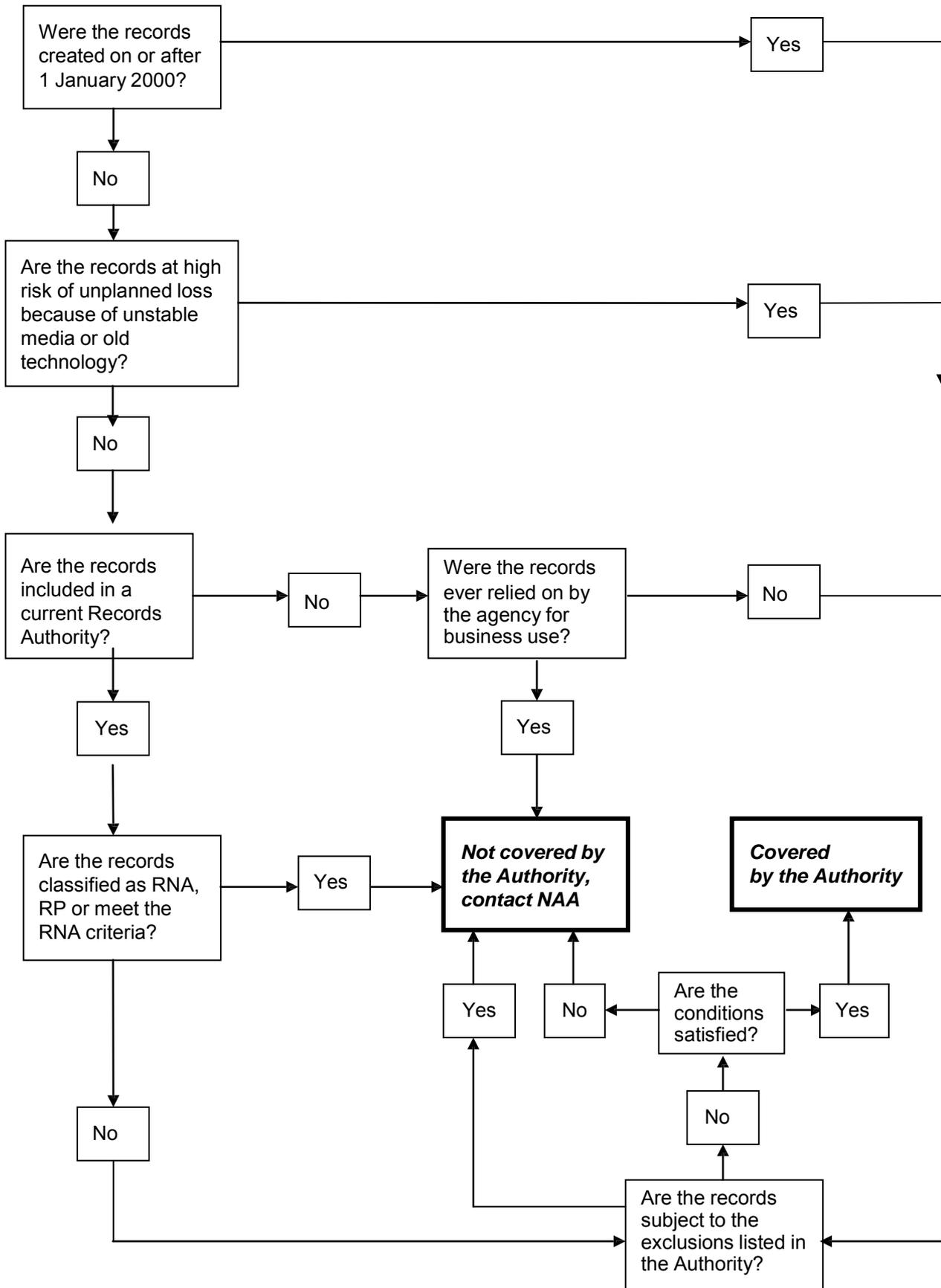
Additional support for making the decision to use and advice on how to use the Authority is provided in the form of a decision flowchart and checklist at the end of this document.

If in doubt on how to use the Authority, please contact the National Archives.

#### **5. Related documents**

- [\*The General Records Authority \(31\) for source \(including original\) records after they have been copied, converted or migrated\*](#)
- [\*Digitising accumulated physical records\*](#)
- [\*Records in evidence\*](#)

### 6. Flowchart: using the Authority



## 7. Checklist

Questions to check before destroying source records	Guidelines	
1. Are the records covered by the scope of the Authority (temporary records of any age, RNA records created on or after 1 January 2000, etc.)?	<b>No</b> <input type="checkbox"/> If no, you are not authorised to destroy the records.	<b>Yes</b> <input type="checkbox"/>
2. Is my agency responsible for the records?	<b>No</b> <input type="checkbox"/> If no, you require the permission of the records "owner" before you can destroy the records.	<b>Yes</b> <input type="checkbox"/>
3. Are the records on loan from the care of the National Archives?	<b>Yes</b> <input type="checkbox"/> If so, you are not authorised to destroy the records.	<b>No</b> <input type="checkbox"/>
4. If the source records are RNA, or RP records, or meet the criteria for RNA records, does your agency consider them to have intrinsic value in their original format?	<b>Yes</b> <input type="checkbox"/> If so, you are not authorised to destroy the records.	<b>No</b> <input type="checkbox"/>
5. Are the source records audio visual records that have not been identified as temporary value records under a current Records Authority issued by NAA?	<b>Yes</b> <input type="checkbox"/> If so, you are not authorised to destroy the records	<b>No</b> <input type="checkbox"/>
6. Do legal requirements, relevant legislation or applicable disposal authorities require the records to be retained in their original or a specific format?	<b>Yes</b> <input type="checkbox"/> If so, you are not authorised to destroy the records.	<b>No</b> <input type="checkbox"/>
7. Is there a government policy or directive requiring retention of the records?	<b>Yes</b> <input type="checkbox"/> If so, you are not authorised to destroy the records.	<b>No</b> <input type="checkbox"/>
8. Do the records relate to a current or future judicial proceeding or are they subject to a current application for access under FOI, Archives or other legislation and are they reasonably likely to be required as evidence?	<b>Yes</b> <input type="checkbox"/> If so, you are not authorised to destroy the records.	<b>No</b> <input type="checkbox"/>
9. Do the reproductions have the required functional equivalence necessary to substitute for the source records for business and legal purposes?	<b>No</b> <input type="checkbox"/> If no, you are not authorised to destroy the records	<b>Yes</b> <input type="checkbox"/>
10. Is there a business need to retain the records in their original form?	<b>Yes</b> <input type="checkbox"/> If so, you should reconsider the decision to destroy.	<b>No</b> <input type="checkbox"/>
11. Are RNA or RP records to be digitised as part of a project?	<b>Yes</b> <input type="checkbox"/> If so, you must agree format standards and verification procedures with NAA before commencing.	<b>No</b> <input type="checkbox"/>

<p><b>12.</b> Are controls in place to maintain the reproductions in place of the source records for as long as required in any current Records Authority covering the source records?</p>	<p><b>No</b> <input type="checkbox"/> If no, this should be undertaken or planned for.</p>	<p><b>Yes</b> <input type="checkbox"/></p>
<p><b>13.</b> Is there sufficient documentation available to demonstrate that the methods used routinely produce accurate and reliable reproductions? This could include documenting the following:</p> <ul style="list-style-type: none"> <li>• who was authorised to do the reproduction?</li> <li>• when did the reproduction process occur?</li> <li>• what equipment and processes were used?</li> <li>• what policies and procedures were followed?</li> <li>• what quality control measures were in place?</li> <li>• were the results of the testing process satisfactory?</li> </ul>	<p><b>No</b> <input type="checkbox"/> If no, this should be undertaken or planned for.</p>	<p><b>Yes</b> <input type="checkbox"/></p>
<p><b>14.</b> Are appropriate procedures and strategies in place to ensure that the reproductions remain accessible for as long as required?</p>	<p><b>No</b> <input type="checkbox"/> If no, this should be undertaken or planned for.</p>	<p><b>Yes</b> <input type="checkbox"/></p>
<p><b>15.</b> Have steps been taken to document the destruction of source records?</p>	<p><b>No</b> <input type="checkbox"/> If no, this should be undertaken or planned for.</p>	<p><b>Yes</b> <input type="checkbox"/></p>

*If you cannot comply with the terms of the GRA (31) but would like to use it, please seek further advice from the National Archives.*

If you have ticked all the boxes in this column, you comply with the terms of GRA (31).

### 8. Determining Intrinsic Value

Assessing the proportion of the physical or intellectual value of the record that may be lost if transferred to another medium which include intangible symbolic, talismanic or artistic qualities as well as their information content.

