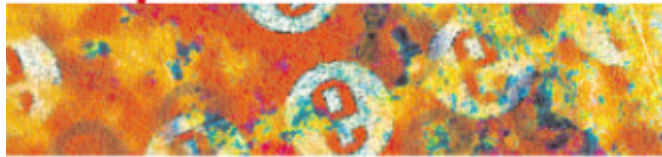




e^opermanence



DIRKS – A Strategic Approach
to Managing Business Information

STEP C – IDENTIFICATION OF RECORDKEEPING REQUIREMENTS

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C.1 WHAT ARE RECORDKEEPING REQUIREMENTS?

The purpose of Step C is to identify and record your organisation's requirements to make and keep *evidence* of its business activities and to document the requirements in a structured and easily maintainable form. The term 'evidence' is used here in its broadest sense, rather than its narrow legal meaning. Evidence (in the form of records) helps ensure that individuals and organisations are accountable to government, courts of law, shareholders, clients, community interest groups and future generations. Records also support business processes and continuity, interaction with clients, quality control and decision-making.

The nature of your organisation and the context in which it operates dictate what type of evidence of its activities it needs to create, what form that evidence takes, how long the evidence should be retained and what access should be provided to that evidence over time. These 'recordkeeping requirements' are identified through a systematic analysis of your organisation's business needs, legal and regulatory obligations, and broader community expectations, as well as an assessment of your organisation's exposure to risk if these evidential requirements are not addressed.

Identifying your organisation's recordkeeping requirements is an essential step in the DIRKS process. It provides the rationale for the creation, maintenance and disposal of records, the basis for designing systems that facilitate such recordkeeping processes, and the benchmark for measuring the performance of existing systems.

To complete Step C you need to:

- [locate](#) relevant sources (Section C.4.1);
- [identify](#) regulatory, business and community requirements for recordkeeping (Section C.4.2);
- [document](#) these identified requirements in a manner suitable for reference purposes (Section C.4.3); and
- [determine](#) and [document](#) which of the identified requirements will be met (Sections C.4.4 and C.4.5).

C.2 BENEFITS OF IDENTIFYING YOUR RECORDKEEPING REQUIREMENTS

By completing this step you will have:

- an understanding of your organisation's requirements to make and keep records as evidence of its activities;
- an appreciation of your organisation's level of exposure to evidence-related risks (such as failures in accountability, legal action and loss of vital records);

- an intellectual framework to support appraisal decisions and disposal actions (see Appendix 8 – [Procedures for developing a records disposal authority](#) in the Commonwealth);
- an appreciation of the internal and external factors (cultural, technological and economic) that influence how these requirements may be met;
- a benchmark for assessing whether your organisation’s current systems meet these recordkeeping requirements (Step D);
- a basis for determining the range of strategies which best enable your organisation to meet these recordkeeping requirements (Step E); and
- the basis for developing functional specifications for recordkeeping systems, including software products (Step F).

This will be documented in:

- a list of all sources containing recordkeeping requirements relevant to your organisation (expanding the list of sources compiled in Step A and B); and
- a list of the regulatory, business and community requirements for recordkeeping derived from these sources, arranged in a form that can be easily maintained over time for reference purpose.

Given the implications for organisational accountability, it is essential that the process of identifying your recordkeeping requirements be well documented. The documentation should provide the rationale for each requirement and enable it to be traced back to its source.

C.3 RESOURCES AND PREREQUISITES

Before starting Step C you should have:

- a general understanding of your organisation and the context in which it operates (Step A);
- analysed your organisation’s functions, activities and transactions (Step B);
- fully documented any sources consulted during Steps A and B so that you can quickly refer to them and determine their usefulness for this step; and
- obtained managerial support to identify and document the organisation’s recordkeeping requirements.

In order to identify and document your organisation’s recordkeeping requirements you will need:

- access to internal and external documentary sources, and information gathered through the interview process (these sources of information may have been used in Steps A and B);

- personnel with analytical skills (including familiarity with modelling techniques), oral and written communication skills and broad knowledge of the organisation; and
- access to personnel with an understanding of legal, audit, quality assurance and other relevant matters to assist with risk and feasibility assessment.

Access to personnel with IT database expertise to assist with documentation can also be beneficial.

Many recordkeeping requirements may have been identified in the course of identifying functions and activities in Step B. These requirements should be linked to the appropriate function and activity once your business classification scheme is finalised.

C.4 IDENTIFYING YOUR RECORDKEEPING REQUIREMENTS

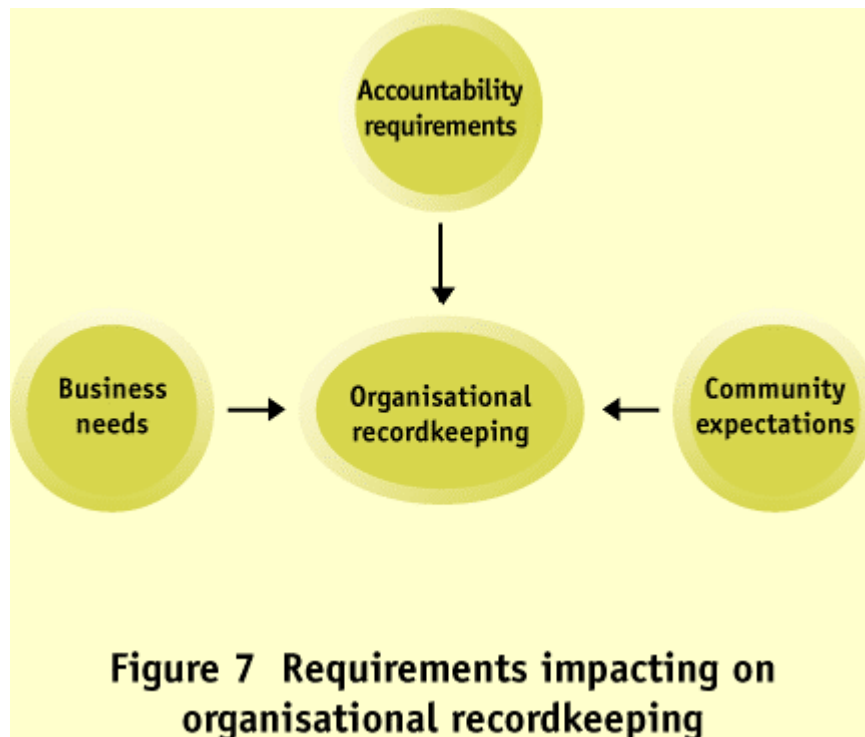
There are three main types of recordkeeping requirements:

- [regulatory](#) (or ‘accountability’ or ‘legislative’) requirements (Section C.4.2.1);
- [business](#) (or ‘operational’) requirements (Section C.4.2.2); and
- [community expectations](#) or ‘sociopolitical’ or ‘societal’ requirements (Section C.4.2.3).

Recordkeeping requirements may be stated explicitly in laws, regulations and other instruments of authority, or implied by the environment in which your organisation operates. They will refer to specific needs for evidence. For example, a requirement may state the need for:

- the *creation* of a record;
- its *retention* for a specified period;
- its *disposal*;
- *access* conditions;
- the *content* the record;
- the *form* it should be in; and
- aspects relating to *quality*, that it is a full and accurate record (See glossary).

In order to identify your organisation’s recordkeeping requirements you should use both documentary sources and interviews. Different types of requirements will generally come from different sources. For example, a regulatory requirement for the creation of evidence will be found in a documentary source, whereas the business need to retain the evidence may come from an interview.



In the course of your investigation, it is likely that you will discover numerous sources that identify needs for evidence. However, it is important to distinguish these 'identified' recordkeeping requirements from those requirements that you ultimately choose to satisfy. The latter requirements, and the quality of evidence created and maintained to support them, will be determined through a process of risk and feasibility analysis.

C.4.1 Locate relevant sources

The first stage of identifying your organisation's recordkeeping requirements is to find relevant internal and external sources (such as those listed in Appendix 1 – [Guide to documentary sources](#)). In Steps A and B you used these sources to analyse your organisation's context and business activities. In this step you need to look at these and other sources to find information that will help you identify and assess recordkeeping requirements.

When researching recordkeeping requirements, it is important to address the interests of all internal and external stakeholders. In Steps A and B you identified the stakeholders of your organisation and particular functions and activities. These stakeholder interests may represent different types of recordkeeping requirement. For example:

- a joint venture partner wants access to your organisation's records of the venture for 10 years (a business requirement);
- the section responsible for an activity regularly refers to the records for seven years after the event (a business requirement); or

- genealogists argue for the indefinite retention of citizenship and immigration files (a community expectation).

Documentary sources may include information on stakeholder interests. Internal business interests may be reflected in policy and procedure material. Written reports regarding the concerns of external stakeholders may be available. Interviews are also effective to gather information about stakeholders' interests in records. Bear in mind that internal staff will often know the interests of external stakeholders.

C.4.1.1 Internal documentary sources

A good place to begin is to identify any previous research into recordkeeping requirements carried out in your organisation. You may be able to use or tailor this information for your current purposes.

For example, analysis carried out in preparation for the design and implementation of other information systems within your organisation may have examined requirements for recordkeeping in specific functional areas. This is particularly likely in core functional areas that require high levels of reporting and/or financial accountability. It may be worth looking at the documentation compiled for these other systems or procedural guidelines that support particular business processes. Your organisation's information systems or business systems unit should be able to provide you with copies of any requirements documentation relating to in-house electronic information systems.

Records disposal authorities under which your organisation currently operates will contain previously identified requirements for the retention of its unique business records. However, it is unlikely that the *sources* of these requirements are explicitly documented in disposal authorities, and recordkeeping requirements not relating directly to *retention* will not be identified. Furthermore, the recordkeeping requirements to retain records may not be comprehensive. Some requirements may have been superseded and new requirements may come into effect. Nonetheless, your organisation's existing disposal authorities can provide a useful starting point. Records documenting the development of these authorities will provide additional information and help you judge the reliability of past disposal actions. Like other requirements, this information will need to be mapped to the relevant functions and activities.

Requirements for evidence may be found (or corroborated) in corporate policies, internal guidelines, procedure manuals, reporting structures (such as those between managers and staff), and quality assurance programs. The examination of internal sources will also help you determine activities and processes that currently result in the creation and retention of records in your organisation. Further investigation of these activities and processes may reveal additional requirements, as well as provide valuable information about your organisation's current recordkeeping systems needed for Step D.

C.4.1.2 External documentary sources

The most relevant external sources are likely to include your organisation's enabling legislation, the legislation it administers, and any legislation that applies to its operations. Regulations issued under legislation may also specify recordkeeping requirements.

You will also need to consider guidelines, reports or directives arising from:

- complaints handling bodies such as the Commonwealth Ombudsman;
- audit authorities such as the Australian National Audit Office (ANAO);
- administrative or judicial reviews;
- committees of inquiry;
- investigative bodies such as royal or independent commissions; and
- policies and guidelines promulgated by the National Archives of Australia.

A failure to recognise requirements resulting from these sources may expose your organisation to penalties and prosecution.

Various industry standards and best practice standards and guidelines adopted or endorsed by your organisation may also be relevant, and include:

- International Organization for Standardization (ISO) 15489 standard on records management and the accompanying technical report;
- International Organization for Standardization (ISO) 9000 series of quality management standards;
- software development standards; and
- documentation standards.

C.4.1.3 Organisational staff

In addition to documentary sources, key personnel in your organisation can provide detailed information on business activities and processes, as well as useful perspectives on why particular records need to be created and kept. Managers can often provide the 'big picture' regarding the organisation's business and accountability requirements. Operational staff and action officers are usually a good source for identifying more specific business requirements based on an analysis of processes. Through analysing process and transactions, requirements to create records often become evident. Audit and legal specialists (both internal and external) may also be consulted to determine specific accountability requirements and retention requirements for legal defensibility. Quality assurance managers, too, can provide useful information about which records need to be kept and why.

Interviews with some key personnel may have been carried out during Steps A and B, and you could draw on this contextual material to focus your

inquiries in Step C. Appendix 2 – [Guide to interviews](#), provides further advice on the type of information you should seek as well as sample questions.

C.4.2 Identify regulatory, business and community requirements for recordkeeping

After *locating* relevant sources, you will need to examine each source to find implicit or explicit references to recordkeeping. This will involve using both a top-down functions-based approach and a lower-level process-based approach to identify requirements for evidence.

C.4.2.1 Regulatory requirements

Determining *regulatory requirements* for recordkeeping involves taking each unique function identified during Step B and determining the recordkeeping requirements that apply to it. As you work your way through the sources, you will progressively be able to identify requirements that pertain to specific activities within the function.

Some regulatory requirements may pertain to processes rather than activities, and therefore may be applicable across different activities, or even functions.

Performing online searches of sources, using terms such as ‘records’, ‘evidence’, ‘writing’, ‘keep’ and ‘documents’, can provide an efficient way of finding the more explicit references to recordkeeping pertaining to your organisation’s functions. To locate the implicit requirements you will need to read the source more thoroughly. The legal information retrieval service ([SCALEplus](#)) of the Commonwealth Attorney-General’s Department or the Australasian Legal Information Institute databases ([AustLI](#)) are useful access points for legislation relevant to your organisation. Similar searches should be conducted of relevant industry regulations and standards although, if such resources are not available in electronic form, manual searches will need to be conducted. A number of standards, including those available through [Standards Australia](#), are accessible (or can be ordered) online.

Some regulatory sources may state only that a particular record, such as a register, be kept and made accessible to certain individuals or groups. Other sources may be explicit about the content of a record, or indicate how long it should be retained. You should bear in mind that the same record or group of records may be required for more than one recordkeeping activity, and that some requirements will be described in more detail than others.

Implicit requirements will be more difficult to ascertain, and will take more time and effort to identify. While it is a time-consuming exercise, carefully checking relevant legislation, formal directives and standards for implicit references to recordkeeping requirements is an essential step in the requirements identification process. It provides a means of acquiring much of the contextual information you need to fully understand your organisation’s regulatory environment. Of course, this approach can be

supplemented by an examination of corporate policies and procedures, and by interviewing personnel who are familiar with the relevant legislation, formal directives and industry standards.

C.4.2.2 Business requirements

Recordkeeping requirements that support business needs are likely to be identified in an organisation's enabling legislation or other instruments of authority, or in the routines that establish and maintain its operations. Organisations that manage funds, for example, will automatically identify a requirement to make and keep evidence of the receipt and expenditure of those funds, as this is a routine part of conducting financial affairs. However, the *form* and *content* of evidence will vary depending on an organisation's functions, corporate culture and external environment.

When business needs or practices change, it is necessary to reassess and identify evidential requirements. The rapid expansion of information technology and telecommunications into business operations has provided such an impetus for many organisations.

A useful way to identify business requirements is to consider the chain of evidence an organisation or individual needs to substantiate a sequence of decisions or actions. For example, copies of invoices sent provide evidence of income due in return for goods or services rendered. This analytical approach deliberately adopts a narrow focus to determine internal business drivers for specific recordkeeping activities. In comparison, Steps A and B adopt a wide view to assess external motivations, influences and constraints on your organisation.

During Step C, you will also need to closely examine existing policies, guidelines, work procedure manuals and standard operating procedures to identify when records relating to organisational functions and activities are created. You will then need to interview business area experts within the relevant functional areas to determine why these records are created and retained. While you may find that some records are created due to previously identified, explicit regulatory requirements, and retained in conformance with existing disposal authorities, other records will be created and retained purely to meet the specific business needs of the organisation.

Information gained at this stage can be used in two ways:

- to determine records currently being created and retained, and the business reasons for their creation and retention; and
- to identify the various recordkeeping systems currently in place within your organisation.

While the identification of current recordkeeping systems is carried out in Step D, some initial work can be done during Step C. For example, during the process of identifying records currently created in the organisation you may discover that records are kept in a variety of formal systems, such as the centralised registry system, the human resource management system, the financial management system, as well as ad hoc systems maintained by

individual officers at their desks. Document this information as you come across it, rather than duplicating your effort at a later stage.

C.4.2.3 Community expectations

Community expectations expressed by a wide range of external stakeholders can give rise to recordkeeping requirements that may or may not be reflected in business and regulatory requirements.

There are times when the community expresses concern about the interpretation and/or application of particular laws or the administrative actions taken by government. Both existing community bodies and new advocacy or interest groups will express their views and concerns to the government in office. Individuals and groups from the media can also be part of this process. An organisation may consult with and form an ongoing relationship with these groups to provide briefings and receive feedback in return. Some organisations also have established relationships with researchers, historical groups, or enthusiasts who take a particular interest in the organisation's archives. Community views may affect government policy informally. Alternatively, the activities of these groups may have more formal effects on the process of government and, eventually, their views may be transformed into formal accountability requirements.

Documentary sources that may give expression to community interests in government records include:

- minutes of consultative meetings;
- proceedings of advisory board or council meetings (where impressions of community expectations are reported);
- representations;
- parliamentary debates;
- media monitoring exercises; and
- the organisation's website (visitors' logs or users' questionnaires).

You may also obtain guidance from staff in the business areas who are aware of community expectations that should be considered in relation to their activities. Consultation with stakeholder representatives should be conducted if sufficient information on their expectations is not available internally, and to foster understanding with the stakeholders.

However, it is often difficult to discern what evidence an organisation should create and keep to satisfy community expectations until it fails to anticipate or recognise an interest in some way and attracts public criticism. Evidence of potential value will be included in policy documents and general correspondence that reveal governments' changing stance on a particular issue or a community's shifting response over time. The value of such records becomes obvious when the histories of particular organisations, functions or activities are commissioned.

C.4.3 Document identified requirements for recordkeeping

The [Acts of Parliament](#), [Statutory rules](#) and [Other sources](#) templates in Appendix 4 – Source identification forms can be used to document the sources that you have consulted in this step. If you are adding to information already gathered during Steps A and B, remember to document any *new* sources you have used. Also update your organisation's register of sources.

After documenting the sources you have used, you will need to document each of the business, regulatory and community-related recordkeeping *requirements* you have identified so that they can be used to assess your organisation's existing systems (Step D), develop recordkeeping strategies (Step E) and design systems (Step F). You should use a format that is easy to maintain, as requirements are prone to change and will need to be amended or updated periodically. The need for evidence of changes to recordkeeping requirements is, in itself, a recordkeeping requirement, because it enables your organisation to account for past recordkeeping actions and decisions. The format you choose will therefore need to be capable of tracking such changes.

There are a number of options for documenting recordkeeping requirements, depending on your organisation's needs and the number and complexity of its requirements. For example, you may choose:

- tables and templates in a series of word-processed documents;
- spreadsheets; or
- databases.

Whichever option you choose, you need to think about the kind of information you want to record, and how it should be structured. You will also need to decide how to represent the links between each requirement and the function, function–activity pair or transaction to which it applies.

C.4.3.1 Tables and templates

You may consider it sufficient to document your organisation's recordkeeping requirements in a word-processed prose report. If so, your organisation may have a corporate style for reports that you should use. However, even in prose reports, it is important that you document information about each requirement consistently and clearly. It may be possible to design a standard form or template that presents the requirements in an easy-to-follow (and relatively easy-to-change) format that is compatible with your organisation's in-house report style. The Appendix 7 – [Function source document](#) template includes a table for documenting minimum information about recordkeeping requirements linked to the functional context. You may use this as a summary of fully documented requirements or decide just to capture the basic information about each requirement in this form.

C.4.3.2 Spreadsheets

Spreadsheets offer more functionality than word-processed reports and need not be complex. Benefits of spreadsheets include being able to sort by different elements, for example function or requirement type, making your research more useable for different purposes. To gain the most benefit from this format it is essential to clearly identify what information is being captured in each column and to segment it as much as possible, that is, to capture small units of information separately.

C.4.3.3 Databases

In instances where there are many recordkeeping requirements, or where requirements are likely to change frequently, it may be appropriate to place information about your organisation's recordkeeping requirements into a database. The advantages of a database over other options are:

- only having to record information, including changes, about a particular requirement, function, activity or function-activity pair once; and
- being able to produce tailored views of the information in the database to meet different needs.

This option will involve more work at the outset, because a database needs to be properly specified, designed and documented for it to be useful and maintainable. Your organisation's information systems or business systems unit should be able to help you with this; it may even build the database for you. It is critical that you clearly specify:

- what information you want to keep in the database;
- how you want the different pieces of information to be linked; and
- how you want to use the information.

The [DIRKS documentation database](#) can be used to document your recordkeeping requirements.

C.4.3.4 What information should you include?

Regardless of the format you choose, you will need to decide what data to compile about your organisation's recordkeeping requirements. Although this will depend on the number and complexity of your organisation's recordkeeping requirements, it is likely to include some or all of the following information:

- the authority responsible for promulgating the source of the requirement;
- the name of the source, including any reference number (ie legislation title and number, publication title and details, personal name and position of informant);

- the date the source came into effect (ie publication or issue date and superseded or decommissioned date);
- a description of the source (eg legislation, regulation, directive, industry standard, best-practice standard, internal policy, community expectation);
- the specific paragraph, clause, section or page in the source that contains the requirement;
- a statement outlining how the requirement relates to the organisation's specific situation (ie the recordkeeping requirement). Remember, requirements relate to records and the statement should also identify the record involved (eg a register, minutes of meeting, etc);
- the stakeholder that has their interest met by the requirement (eg a community group or a particular section of the organisation);
- the evidential need the requirement relates to (eg the content, form or quality of the record or its creation, retention, disposal or access);
- the business function, activity or function–activity pair the requirement applies to (ie drawn from the analysis of business activity in Step B);
- a citation of the precise text in the source that specifies (or implies) the requirement;
- the organisational position responsible for ensuring that the requirement is met; and
- results of any risk assessments.

Information about the source of the requirement should be contained in the register of sources and could be linked to the requirement by a reference number, rather than replicating the information.

Table 1 illustrates how full information on a recordkeeping requirement for IP Australia may be documented in a simple template format. Other options discussed above, such as databases or spreadsheets, are easier to manage. The requirements are grouped together as they relate to the one record – a register of patents – and come from one source.

Table 1 Sample recordkeeping requirements for IP Australia

Originating authority	Parliament of Australia
Source name	<i>Patents Act 1990</i> (No. 83 of 1990)
Effective date	30 October 1990
Source type	Legislation
Reference	Section 186 – Register of Patents Section 190 – Inspection of Register
Function/activity	Patent, Trade Mark and Design Rights Management – Registration
Citation	<p>Section 186</p> <p>(1) A Register of Patents is to be kept at the Patent Office.</p> <p>(2) The Register may be kept wholly or partly by use of a computer.</p> <p>(3) If the Register is kept wholly or partly by use of a computer:</p> <p>(a) references in this Act to an entry in the Register are to be read as including references to a record of particulars kept by use of the computer and comprising the Register or part of the Register; and</p> <p>(b) references in this Act to particulars being registered, or entered in the Register, are to be read as including references to the keeping of a record of those particulars as part of the Register by use of the computer; and</p> <p>(c) references in this Act to the rectification of the Register are to be read as including references to the rectification of the record of particulars kept by use of the computer and comprising the Register or part of the Register.</p> <p>Section 190</p> <p>(1) The Register must be available for inspection at the Patent Office by any person during the hours that it is open for business.</p> <p>(2) If a record of particulars is kept by use of a computer, subsection (1) is to be taken to be complied with, to the extent that the Register consists of those particulars, by giving members of the public access to a computer terminal which they can use to inspect the particulars, either on a screen or in the form of a computer printout.</p>
Recordkeeping requirement(s)	<p>A register of patents, in either hardcopy or electronic form, must be created and maintained.</p> <p>The register must be kept at the Patent Office (now IP Australia).</p> <p>The register must be accessible to members of the public. If all or any part of the register is in electronic form, the appropriate hardware and software must be available at IP Australia to enable access by members of the public.</p>

Stakeholder	Parliament, general public
Requirement type	Creation / Access / Form
Risk assessment	High – requirement mandatory

C.4.4 Assess the risk of not meeting requirements

Risk is an important factor that must be considered in recordkeeping. For example, there may be risks involved in not:

- creating records in the first place;
- capturing and managing records in a recordkeeping system;
- keeping records;
- destroying records when they are no longer required; and
- ensuring that records remain accessible and readable over time.

Organisations should be aware of the possible consequences arising from these risks. Decisions not to meet requirements may:

- compromise current or future business activity;
- compromise the organisation's capacity to defend or prosecute claims;
- result in loss of amenity for the organisation;
- attract adverse publicity or community reaction;
- compromise rights and entitlements of other parties affected by government decisions and actions;
- compromise wider government interests; and
- diminish archival resources.

This is a different approach to risk than that used in other steps. In Steps A and B you examined the risks related to the business activity, that is, the risk involved in performing the work. In this step, you are examining recordkeeping risks. Recordkeeping risks are the risks that result from not having appropriate records of the work. There are links between the two types of risks; for example, the high risk related to a particular area of business could be reduced by good recordkeeping. Therefore the risks of not creating records relating to this area may be high.

The level of risk associated with maintaining records may influence the length of time the records will be retained, particularly if the risks of disposing of them become moderate to low. The 'risks' associated with maintaining records include preservation, security, servicing and legal discovery costs, and improper access leading to breaches of privacy or confidentiality. Assessments may need to be conducted in some

circumstances to determine the consequences of risks and ways to treat them. The risks of discovery action or legitimate access to records should not be used to justify the non-creation or premature disposal of records that it would otherwise be desirable to have.

If there are any requirements which your organisation is considering not meeting, or if there is a conflict between requirements, a risk assessment can help determine an appropriate course of action. You need to provide clear definitions of what constitutes different levels of risk to your organisation (including ‘unacceptable risk’ as a benchmark), and then prioritise the identified recordkeeping requirements according to this scale. Your organisation may already have in place its own risk management policy that defines such benchmarks. See Appendix 11 – [Risk analysis in DIRKS](#).

The results of this risk assessment, and risks linked to particular functions (Step B) can help determine what recordkeeping requirements should be met. See Appendix 12 – [Recordkeeping feasibility analysis](#). The various tables, matrices and other techniques used in risk and feasibility analysis will help you to:

- identify specific areas of recordkeeping risk in your organisation;
- quantify and prioritise those risks in terms of the cost to, or impact on, your organisation (ie operational, financial and technical feasibility factors); and
- make, justify and document recommendations for meeting recordkeeping requirements.

C.4.5 Report to management

Your prioritised recordkeeping requirements should be formally submitted to management for endorsement. It is particularly important to justify recommendations *not* to meet any recordkeeping requirements. These management-endorsed recordkeeping requirements will provide a mandate for the creation of records in the organisation.

You may also wish to draw on the generic characteristics of systems that keep records to inform management about the structures necessary to support these recordkeeping requirements (see Part 1, Section 4 – [Characteristics of systems that keep records](#)). This report can also be used as an opportunity to gain management support for future steps.

If you are developing a records disposal authority, you may wish to postpone seeking management approval until after you have completed disposal recommendations. However, it is important that management endorses the full set of recordkeeping requirements including creation, access, content and form, not just those relating to retention or disposal.

C.5 ISSUES

C.5.1 Drawing on other recordkeeping projects

While it is possible to draw on other projects and organisations for inspiration, every organisation must develop its own list of recordkeeping requirements, based on an analysis of its specific business, regulatory and community requirements for evidence.

The National Archives Administrative Functions Disposal Authority (AFDA) project may serve as a useful model. During the development of AFDA the Archives created a relational database to document the business, regulatory and community-based recordkeeping requirements that pertain to general administrative functions. The database is a compilation of requirements collected from legislation, formal directives, industry standards and guidelines, procedures, and community expectations relating to general administrative functions applicable across the Commonwealth jurisdiction. Each individual requirement is explicitly linked to the specific Keyword AAA function-activity pair to which it pertains.

C.5.2 Maintaining a history of recordkeeping requirements

Recordkeeping requirements will form the agreed benchmark against which all recordkeeping practices will be judged, therefore it is important to track changes to recordkeeping requirements over time. Records about past and current requirements should be maintained, because such information provides context for the evidence that your organisation chooses to keep. Changes could occur as a result of:

- changes to business practices or needs;
- changes to legislation;
- changes in perceptions of risk or priorities;
- the organisation losing or gaining functions;
- tests in Steps E, F or G that expose flaws or inconsistencies in the requirements; and

the discovery, during systems design and implementation, that a particular requirement cannot reasonably be met due to financial, personnel, design, equipment or other considerations.

C.5.3 Using recordkeeping requirements

Your set of approved recordkeeping requirements can be used for a number of purposes. As well as providing the basis of a [records disposal authority](#) (Appendix 8), they also provide a mandate for the creation of records in the organisation. Based on the requirements, a list can be compiled identifying those records you have determined should be created. A set of record creation rules will be useful for many reasons. They can be used to:

- educate staff about their recordkeeping obligations;

- show the minimum level of documentation to be captured as records;
- help determine how best to capture ‘essential’ records in Step E;
- assist in the fulfilment of recordkeeping requirements; and
- assist auditors in determining if appropriate action was taken.

C.5.4 Recordkeeping requirements for housekeeping functions

There are also many legislative, business and community requirements relating to the records of housekeeping functions, such as financial management and occupational health and safety. It is not necessary for you to investigate these requirements as the National Archives is currently developing advice on these requirements based on research undertaken for the Administrative Functions Disposal Authority (AFDA). Compliance with these requirements will have to be assessed in Step D.

C.6 CHECKLIST

Before proceeding further check that you have:

- identified and documented all sources of your organisation’s recordkeeping requirements;
- documented your organisation’s identified requirements in a structured, traceable and easily modifiable form;
- investigated risk and feasibility factors associated with requirements where necessary; and
- documented your assessment of these factors.

C.7 WHAT’S NEXT?

You can now move on to Step D – [Assessment of existing systems](#) and use the recordkeeping requirements document to assess the performance of your organisation’s current recordkeeping systems.

You may also wish to develop [classification tools](#) such as a [functions thesaurus](#) based on your BCS (Step B) and informed by the recordkeeping requirements identified in Step C.

You have also completed substantial work towards the compilation of a functions-based records disposal authority for your organisation. Use Appendix 8 – [Procedures for developing a records disposal authority](#) in Commonwealth agencies to complete this project.