NAA

NATIONAL ARCHIVES OF AUSTRALIA

Building Trust in the Public Record:

managing information and data
for government and community

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EXPOSURE DRAFT

Contents

Foreword

The Australian Government makes decisions which affect the daily lives of millions as it works to grow Australia's economy, create jobs, support the Australian community and keep it safe. Records of government decisions and actions are an essential source of information for effective and responsive service delivery. The duty to document does not cease as government embraces new ways of improving service delivery and interacting with the community, including applying advanced data analytics and communicating through social media platforms. For transparent and accountable government, records of decisions – including the reasons for those decisions – need to be made and kept. This may include keeping new forms of evidence, such as data code or algorithms.

The most significant records of the Australian Government are selected as its national archives. They tell the story of Australia and illustrate how the government affects, and is affected by, Australian society. They are preserved and made accessible to the community by the National Archives of Australia, to be re-used for community benefit.

Government records are a rich documentary source for historians and researchers. The recent COVID-19 pandemic has sparked interest in an earlier pandemic: the 1918 influenza 'Spanish flu'. Patent records demonstrate the inventiveness of Australian minds, while records from both world wars show the community working together at home and overseas to defend our country and way of life.

These records also document the separation of families, from those displaced from their homelands during war to the Aboriginal and Torres Strait Islander children removed from family and country by past government policy. Records held by the National Archives of Australia are a source of personal memory and can be used to connect families to earlier generations.

Recent royal commissions reflect society's desire to protect the vulnerable – from children to the aged. The Royal Commission into Institutional Responses to Child Sexual Abuse noted that poor recordkeeping practices pose serious risks to preventing, identifying and responding to child sexual abuse. Records are vital if we are to protect the vulnerable, evidence past injustices, provide redress as acknowledgement of past harm and, hopefully, contribute to healing and reconciliation.

This policy identifies key requirements and actions for the Australian Government to further improve the management of government records, information and data. This will ensure that the National Archives and the Australian Government has a public record that can be trusted for all its uses by government and community.

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Introduction

The Australian Public Service needs authentic, complete and reliable information to make evidence-based decisions, provide sound advice, develop good policy and deliver programs effectively. Community members need to be confident that the information they share with government will be held securely, shared responsibly and made available as accurate proof of their entitlements when needed. Good information management is essential to building trust in the creation, collection and use of Australian Government information to meet the outcomes required by government and community.

When information is managed well, it:

- enables the Australian Government to be transparent, responsive and accountable to the community it serves

- is foundational to the Australian Government's digital transformation agenda to improve government services to the community

- enables the Australian Government to support and protect the vulnerable, redress past injustices and reduce inequity within the community

- underpins Australian Government social, scientific, medical, agricultural and industry research, projects and problem-solving

- is available for re-use to drive innovation, increase economic productivity and enhance social and cultural outcomes

- is preserved as evidence of the most significant interactions between the Australian Government and the community. These are kept as the national archives and form part of the history, identity and memory of the Australian nation.

Well-managed information is the result of planned, enterprise-wide management of information assets, technologies, processes and staff behaviours within individual agencies and across government.

The National Archives of Australia has run annual information management surveys since 2011. These indicate that, while good progress is being made across the Australian Government, there is still a need for improved information management capability to enable delivery on government objectives.

Terminology

This policy applies to Australian Government digital and non-digital records, information and data which are created, collected, received and kept as part of government business.

The policy uses the term 'information asset' to refer to records, information and data collectively and 'information management' to refer to their collective management.

Purpose

The purpose of this policy is to improve how Australian Government agencies create, collect, manage and use information assets. Effective information management facilitates delivery on government objectives to better support, protect and serve the Australian community – now and in the future. This increases public trust in government.

This policy identifies key requirements and actions for Australian Government agencies to build information management capability and address areas of lower performance.

In line with the National Archives' previous policies, it supports a number of government agendas led by other agencies. These include Australian Public Service reform, digital transformation of service delivery to the community, data-sharing and release, and building public trust in government data.

The *Building Trust in the Public Record: managing information and data for government and community policy* builds on the National Archives' previous policies, *Digital Transition* (2011) and *Digital Continuity 2020* (2015), to support agencies to effectively manage information assets.

Who is this policy for?

This policy identifies key information management requirements for agency heads, who are accountable for information governance in their agency. It provides supporting actions and guidance for information managers responsible for its implementation. This ensures that everyone employed by the Australian Public Service understands their responsibility to manage information well, according to its value as an asset to government and community.

Ultimately, this policy is for the community. It ensures government information is created, collected and managed to effectively serve the community and protect individual and community rights and entitlements. This includes the community's right to know and understand the basis of government decisions and actions as part of accountable democracy.

Role of the National Archives of Australia

This policy has been developed by the National Archives of Australia to enable continuous improvement in managing Australian Government information assets.

Under the *Archives Act 1983*, the National Archives:

- sets information management requirements for Australian Government agencies

- ensures the Australian Government creates and keeps records of its actions and decisions to demonstrate accountability to the community and evidence the integrity of the operations of the Australian Public Service

- authorises destruction of information assets with no ongoing value to government or community

- selects and preserves the most significant records of the Australian Government and makes these available to government and community as a national resource to enrich and inform how we live today.

The National Archives' work complements the work of **other key agencies** which build capability in, or provide advice about, the management and use of Australian Government information assets. The National Archives has worked collaboratively with these agencies to develop this policy to ensure consistency of Australian Government information asset policy advice.

Policy statement

Agencies will:

- **manage information assets strategically with appropriate governance and reporting** to meet current and future needs of government and community

- **implement fit-for-purpose information management processes, practices and systems** that meet identified needs for information asset creation, use and re-use

- **reduce areas of information management inefficiency and risk** to ensure public resources are managed effectively.

Managing information assets to enable trusted use by government and community

The National Archives issued an **Information Management Standard for Australian Government** in 2017. This standard is consistent with the International and Australian Standard AS ISO 15489 (2016) Records Management. It sets out principles for the management of information to support agencies to meet business, government and community needs and expectations.

The table below illustrates how to manage information assets to enable trusted use based on the 8 principles of the standard. The requirements and actions outlined in this policy are consistent with the principles of the standard.

Information assets should be:
1. Governed systematically
2. Created accurately and completely
3. Described so they can found and understood
4. Stored securely and preserved so they remain usable
5. Kept for as long as needed by government and community
6. Accountably destroyed when no longer needed
7. Kept in fit-for-purpose systems and managed according to value and use
8. Available for reliable use and re-use by government and community

The importance of good information management

Contemporary information management is different to past practices. Digital technologies are constantly evolving, providing opportunities for more efficient ways of working. This can also lead to information management challenges.

An agency's information assets are rarely created and organised centrally. Instead, they are created and kept in a variety of locations, on site and cloud based, using many formats, applications and systems. Over time, formats and systems become outdated and need active intervention to preserve the accessibility of content.

Information management is not an end in itself. If information assets are not managed well, agencies risk basing their activities and decisions on incomplete and inaccurate information. Good information management maximises the value of an agency's information assets by ensuring they can be found, used and shared to meet government and community needs.

| Poor information management increases … | | Good management delivers trusted information that: |
risks of:	potential consequences of:	
- inaccurate and unreliable information - duplicated information, or siloed information which is unable to be shared - inability to find all necessary information, particularly if it is stored across multiple systems - poor information quality where the origin or context is undocumented - unauthorised access, including security and data breaches - loss of access to information assets through premature destruction or storage in outdated technologies - spending public money storing and managing information assets that are no longer needed, making needed information harder to find.	- bad business decisions - loss or compromise of rights and entitlements - loss or compromise of community trust in the government's ability to manage and use information - inefficient services to the community - inability to properly advise or report to the minister and other stakeholders.	- is a foundation for reliable research and findings - enables innovation - supports strategic objectives and business outcomes - provides a sound basis for defensible, evidence-based decisions and policies - mitigates business risk, including business continuity and reputational risks - supports rights and entitlements and government accountability - maximises the value of Australian Government information assets for use now and in the future - builds community trust in government.

Improving performance in managing information management assets

The National Archives' annual **Check-up** surveys measure agencies' progress in managing Australian Government information assets. The average score across the Australian Government in the 2019 survey was 3.25 out of 5 for overall information management capability. This indicates that improvement will still be required at the end of the *Digital Continuity 2020* policy. The lowest capabilities identified were governance, interoperability of data between systems, and sentencing (recording when information assets can be destroyed or transferred to the National Archives).

As outlined in the policy statement above, this policy identifies 3 key requirements for Australian Government agencies to address these capability gaps and improve their information management.

These key requirements are further described below.

1. Manage information assets strategically with appropriate governance and reporting

Good information governance ensures that all obligations are known and met.

In 2020, as the Australian Public Service responded to the COVID-19 pandemic, the Australian National Audit Office (ANAO) published insights based on lessons learned from previous audits relating to the rapid implementation of Australian Government initiatives (16 April 2020). The ANAO stressed the importance of balancing a focus on results with accountability for those results. It recommended creating and maintaining a 'minimum standard of documentation relating to administrative processes and decisions', including oral and digital communications, to assess if an agency is 'fully meeting government objectives and discharging accountability and transparency obligations, including external reporting'.

Effective governance ensures that information management is aligned to strategic objectives to improve business outcomes and mitigate risk. It includes looking over the horizon and having a vision of what information assets will be needed in the future and how they can best be managed to meet agency, government and community needs.

A strategic assessment of current and future needs for information, and a plan for how to align information management to meet those needs, should be documented and reported to senior management. Each agency will have business-specific needs for information, as well as the need to meet broader commitments to open, responsive and inclusive government.

It is important to identify and register information assets held by Australian Government agencies. Agencies should document their value to the business and other stakeholders, and include high-level management considerations such as sensitivities associated with the information. This results in known information assets that can be managed according to their value and made available for government and community use.

Good governance includes senior management support for building a culture that respects the value of information assets to business and the community. Information management policies should have an accountability framework to ensure staff know and meet their responsibilities when creating and using information assets.

Information managers should report regularly to senior management on progress made in managing information assets. Internal reports should document mitigation strategies for information management risks. These include risks associated with not following the recommended practice for managing information assets.

What success looks like

Governance arrangements are up to date and cover all information assets.

An enterprise-wide, strategic approach to managing information assets meets current and future needs. Areas of lower information management capability and performance are identified, with plans to redress them.

Information assets are identified and registered where there is business or community value.

Senior management visibly and proactively supports information management and there are internal structures for senior managers to engage with skilled information management professionals.

Regular internal reporting monitors information management progress. Agencies assess their information capability annually through the National Archives' survey tool – Check-up.

2. Implement fit-for-purpose information management processes, practices and systems

Fit-for-purpose records management should meet needs for the information.

In 2017, the Royal Commission into Institutional Responses to Child Sexual Abuse reported on the consequences of poor records management for victims and survivors of child sexual abuse. It heard of many instances in which records were never created, contained inadequate content, were lost or destroyed or were unable to be located. The Royal Commission noted the distress this caused survivors and how (early) loss or destruction could:

- 'prevent the identification of perpetrators
- obscure institutional knowledge and responsibility
- leave survivors feeling their accounts are not believed and cannot be verified
- prevent or hinder redress and civil or criminal proceedings.'

Final Report: Volume 8 – Recordkeeping and Information Sharing (2017:42)

Information management processes, practices and systems are fit for purpose when they meet identified needs for accurate information creation and use. 'Fit for purpose' varies according to: specific business needs to manage and use information; the value of information; other stakeholders who need to use the information; and any special characteristics of the information, such as sensitivity. For example, some systems need to support interoperability and will need the functionality to share information effectively. Other systems need to be standalone to protect highly sensitive information from unauthorised use. Both systems are fit for purpose.

Members of the Australian community interact with the Australian Government throughout their lives. Individuals pay taxes, seek advice, and make applications for citizenship, pensions, and other rights and entitlements. The community expects the government to create and keep records as evidence of these interactions to enable current and future rights and entitlements. Records must be created and managed to maintain community trust that they can rely on government to do this accountably.

A priority for the Australian Government is to provide world-class, connected services tailored to business and community needs, with easier interactions with government. Accurate and reliable information assets are required to meet these outcomes. The ability to share and exchange data between systems, and reduce unnecessary data silos, is key to supporting connected services. This will also facilitate the government's commitments to releasing and sharing data to maximise its use and re-use. Working towards interoperable information management systems across government, where practical, will create efficiencies during times of administrative change.

Information assets typically have a life span beyond the initial technology in which they were created or delivered and may need to be migrated across several systems during their period of use. Forward planning is required to preserve both data and information about its context. Context includes where it originated or who created it, when it was created and how it was used. This is critical to ensuring continuity of government services and accountability.

What success looks like

Business systems, including whole-of-government systems, have appropriate functionality to manage information assets. To ensure availability and integrity of data, the need for information management functions is assessed when systems are purchased, designed or upgraded.

Information assets have adequate and standardised descriptive information (metadata) that facilitates business use and data-sharing. The content and context of data is known, can be verified and can be understood.

Interoperability maturity needed for data exchange and sharing is assessed, and gaps are addressed.

Strategies, including digital preservation strategies, are implemented to ensure information assets are available and usable for as long as they are required.

Sustainable digital file formats are used to ensure content is available for as long as needed.

3. Reduce areas of information management inefficiency and risk

Inefficiencies impact on service delivery and expose the government to risk.

The independent review of the Australian Public Service, *Our Public Service: Our Future*, noted a number of risks and inefficiencies associated with legacy systems, including cyber risks and impacts on service delivery from fragmented and ageing technologies (2019:156).

Recommendation 14 for an audit and plan to redress these deficiencies was accepted by the Australian Government in its response to the review, *Delivering for Australians – a world-class Australian Public Service: the Government's APS reform agenda* (2019:19).

There are areas of known inefficiency and potential risk in the way some Australian Government information assets are currently managed. These include:

- information assets that are not managed digitally when they could be, including by printing to paper

- legacy systems based on outdated technologies needed for day-to-day operations which do not meet modern information management needs

- agencies which hold large quantities of information assets where their value has not been assessed, or they are kept past the period for which they are needed.

Digital information assets and processes enable information to be readily accessed, shared and integrated into service delivery. Digital processes are more efficient for most customer service delivery.

Systems based on outdated technologies do not perform optimally to meet business needs. They may not be able to share data or analyse it effectively. It is a government priority to review and update these systems where required. Responsible management of information assets must be an integral part of any system upgrade or migration. Systems should not be decommissioned without considering future needs for the information assets they hold, or whether the information assets can be accountably destroyed.

Legacy information assets are information assets that are no longer required for agency business purposes. They may be in known locations, in neglected or inaccessible systems, in forgotten cloud-based platforms, in removable storage devices or in a variety of physical locations. Often the content and value of legacy information assets is unknown, which means that the most significant Australian Government records of Australia's history may be at risk. Information assets should be managed according to their value. This includes documenting how long information assets should be kept and destroying them when they are no longer needed. Keeping information assets for longer than needed has financial, resourcing and efficiency costs. It may make needed information assets more difficult to find. They may become a 'honey pot' for hackers, potentially exposing the information to privacy and security risks.

What success looks like

Work is digital by default.

Analogue processes are regularly reviewed and replaced with digital processes.

Information management requirements are met when migrating, upgrading or decommissioning outdated systems.

How long information assets should be kept is regularly recorded (sentenced) so they can be managed according to their value.

Information assets are promptly destroyed when they are no longer required for business purposes. The most significant information assets are transferred to the National Archives.

Guidance and support

Appendix A provides a list of actions for agencies to successfully implement the policy.

To support agencies to implement the policy, the National Archives:

- has updated existing advice and products and developed new advice and products

- will progressively release more products and advice throughout the policy period in accordance with a publicly available release schedule

- will engage with agencies to understand what further assistance they need.

Agencies should contact the **Agency Service Centre** with any queries regarding this policy.

Authority

Under section 2A of the *Archives Act 1983*, the National Archives has the authority to issue standards, set obligations and provide advice on managing Australian Government records.

The Act's definition of a 'record' covers any form of documented information kept because of the information that can be derived from it or its connection with an event, person, circumstance or thing.

This policy identifies information management practices for non-corporate and corporate Australian Government entities, and wholly owned companies including government business enterprises. These are collectively referred to as 'agencies'.

The National Archives will report annually to government on the status of information management in agencies and make recommendations for further improvements.

Appendix A: Actions for policy implementation

Purpose

This document provides implementation advice to assist agencies to meet the key requirements described in the *Building Trust in the Public Record* policy statement – that is, that agencies will:

• manage information assets strategically with appropriate governance and reporting to meet current and future needs of government and community

• implement fit-for-purpose information management processes, practices and systems that meet identified needs for information asset creation, use and re-use

• reduce areas of information management inefficiency and risk to ensure public resources are managed effectively.

Implementation

The key requirements in the *Building Trust in the Public Record* policy statement are described at a high level. This implementation advice provides actions for agencies to undertake to meet those requirements. Most of the actions listed are recommended as good practice to achieve the policy's desired outcomes. There are 3 mandatory actions. The first two are carried through from the National Archives' previous policies, *Digital Transition* (2011) and *Digital Continuity 2020* (2015). The third mandatory action is based on requirements of the *Archives Act 1983*.

The National Archives recognises that there is a diversity of agencies across the Australian Government, with different business responsibilities, resources, risk tolerances, capabilities and information management environments. What might be a priority action for one agency may not have the same urgency for another.

The *Building Trust in the Public Record* policy gives agencies flexibility to take action in the manner and order that best meets their business needs.

The National Archives will monitor whole-of-government progress in implementing the policy through its annual Check-up survey.

The National Archives will help agencies implement the policy by providing a range of supporting guidance and tools. Collaborative approaches and solutions to common problems will be sought and shared through ongoing engagement with agencies.

Manage information assets strategically with appropriate governance and reporting

Actions for Australian Government agencies	Obligation
Assess your information management capability annually using the National Archives' survey tool – Check-up.	**Mandatory**
Review and update your information governance framework to incorporate enterprise-wide information management. This should include governance for records, information and data. Develop an information governance framework if one does not exist.	**Recommended**
Review and update roles and responsibilities for your Information Governance Committee and Chief Information Governance Officer to include enterprise-wide information management. Establish a committee and Governance Officer role if they do not exist.	**Recommended**
Create an enterprise-wide information management strategy.	**Recommended**
Register your information assets where there is business or community value in doing so.	**Recommended**
Undertake a capability assessment of skills required for information management and plan to redress any gaps through upskilling or employment.	**Recommended**
Actively support information management at a senior management level and have structures in place to engage with information asset managers.	**Recommended**
Monitor and report regularly to senior management on progress made towards achieving policy actions. Document risks of not meeting recommended practice.	**Recommended**

Implement fit-for-purpose information management processes, practices and systems

Actions for Australian Government agencies	Obligation
Manage all information assets created in digital format from 1 January 2016 digitally.	**Mandatory**
Ensure all business systems, including whole-of-government systems, meet functional and minimum metadata requirements for information management.	**Recommended**
Assess interoperability maturity, based on business and stakeholder needs. Identify interoperability maturity gaps and plan to address them.	**Recommended**
Implement strategies, including storage and preservation strategies, for the management of all information assets.	**Recommended**
Create digital information assets in sustainable digital formats.	**Recommended**

Reduce areas of information management inefficiency and risk

Actions for Australian Government agencies	Obligation
Transfer 'retain as national archives' information assets as soon as practicable, or within 15 years after creation, to the care of the National Archives.	**Mandatory**
Identify remaining analogue processes and plan for transformation to digital, based on business need.	**Recommended**
Identify poorly performing legacy systems; address information management requirements when upgrading, migrating and/or decommissioning systems to meet business needs.	**Recommended**
Sentence digital information assets and destroy digital information assets of temporary value when no longer needed.	**Recommended**

Appendix B: The Australian Government information asset and digital environment

The National Archives leads Australian Government information management by developing policies, standards and advice to assist Australian Government agencies.

The National Archives authorises the retention and destruction of Australian Government information assets. It also identifies, preserves and makes accessible the most significant information assets of the Australian Government.

The National Archives' work complements that of other key agencies (listed below) which build capability in, or provide advice about, the management and use of Australian Government information assets.

Key agencies	
Attorney-General's Department	Delivers protective security policy and guidance including on protection, and information security classification, of information assets. Has oversight over freedom of information, privacy and archival legislation.
Australian Bureau of Statistics	Delivers quality statistical processes and services and trusted and objective data and statistics.
Australian Public Service Commission	Delivers professional development of the Australian Public Service, including its workforce digital and data capability.
Australian Signals Directorate	Delivers policy and guidance on cybersecurity to improve Australian Government cyber resilience against cyber threats to digital systems and information assets.
Department of Finance	Delivers policy and guidance on public sector resource management, governance and accountability to improve performance management of Australian Government assets, including information assets.
Department of Prime Minister and Cabinet	Delivers Australian Government improvements in maximising the use of public sector data and the release of non-sensitive public sector data. As part of the Department of the Prime Minister and Cabinet the Office of the National Data Commissioner delivers public sector data sharing policy and guidance, including sharing of sensitive data, and is establishing a data sharing framework for all agencies.
Digital Transformation Agency	Delivers policy and guidance on whole-of-government and shared ICT and digital services to support transformation of Australian Government digital services.
Office of the Information Commissioner	Delivers privacy and freedom of information policy and guidance; to give effect to public rights of access to Australian Government public sector data, and protection of personal information.