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Management of Email as Official Records

Policy, Guidelines and Technical Considerations

Guideline

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Introduction

Electronic records are a critical element in the conduct of the business of the Government of South Australia, for its accountability, and in the ongoing documentary heritage of the State. Strategies need to be put in place now to ensure that electronic records are properly created and captured, survive without alteration or degradation, and remain accessible for as long as they are required.

The successful management of electronic records, particularly those that have ongoing value to the Government and the community, requires involvement from records creation and system development through to the destruction or ongoing maintenance and accessibility of such records.

Without active management throughout their existence, electronic records are not likely to remain accessible nor to be complete and reliable, even over short periods.

Purpose of this document

The purpose of this document is to provide

- ▶ policy
- ▶ guidelines and
- ▶ technical considerations

for the management of e-mail as official records. This document applies to all state and local government agencies within South Australia, as defined by the *State Records Act 1997*.

The purpose of the policy statements is to establish a Whole-of-Government approach to the management of e-mail messages as official records¹. The policy statements are not a code of conduct in the use of e-mail, although they should inform such a code when agencies develop these². The policy statements incorporate a series of actions that need to be implemented by agencies to ensure that e-mail messages as official records are appropriately managed.

The purpose of the guidelines³, presented in the form of Frequently Asked Questions, is to assist agencies in implementing the policy statements.

¹ The policy section is adapted from the exposure draft *Guidelines for the management of electronic mail (e-mail) within State Government agencies* that was tabled at the October 1999 meeting of the Whole-of-Government Information and Records Management Strategy Group. Established by the Senior Management Council, the Strategy Group is responsible for examining and formulating strategies for improving information and records management practices at agency and Whole-of-Government level to ensure legislative obligations are met and effective practices are in place.

² For example: "The use of e-mail as a formal communication tool needs to be in accordance with applicable codes of conduct to protect [a] Department and the Government from illegal, unethical and inappropriate use": Department for Administrative & Information Services. *Guidelines for using and managing e-mail*. March 1999. <http://in.dais.sa.gov.au/resources/itservices/email.htm> Accessed 30 April 1999.

³ This section is adapted from – Edwards US Air Force Base, Email and official records: Frequently Asked Questions: <http://www.edwards.af.mil/pim/imqr/emcover.htm>. Accessed 17 February 2000.

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The technical considerations section outlines a range of interim technical solutions to address “capture” and storage of more than transitory value official e-mail as the first stage in the development of a comprehensive approach to all aspects of e-mail management. This range of options is necessary because of the range of systems currently in use.

Variation to this document

This document has been endorsed by both the State Records Council and the Whole-of-Government Information and Records Management Strategy Group. State Records may update or alter these guidelines from time to time as authorised by the Manager [Director] of State Records, in consultation with the State Records Council. All South Australian agencies shall be informed of any such alterations or updates.

Managing e-mail messages as official records: Policy statements⁴

E-mail messages are records

- ▶ A 'record' as defined by section 3 of the State Records Act, means written, graphic or pictorial matter, or a disk, tape, film, or other object that contains information or from which information may be reproduced (with or without the aid of another object or device). Given this definition, e-mail messages are records.
- ▶ E-mail messages are 'official records', as defined by the State Records Act, when they are made or received in the conduct of agency business.
- ▶ Each agency should develop guidelines that clearly define what types of e-mail messages are official records in the context of the agency's particular business functions and activities.
- ▶ It should be clearly stated in agency procedures when it is appropriate to use e-mail systems to generate or transmit official records. Official records that are strictly confidential in nature, require authorisation and/or verification, have privacy implications or are of a legally sensitive nature may need to be generated through some other more secure medium.
- ▶ Each agency should have in place a policy on the use of e-mail systems for informal or personal use.
- ▶ Based on agency policy and procedures, the differences between informal e-mail messages and official records should be unambiguous for the end user.
- ▶ E-mail messages that are official records do not belong to the individual but are the property of the agency and therefore should be managed as an agency responsibility.

E-mail messages, as records, should be adequately managed

- ▶ Both the content and the context of e-mail messages that are 'official records' need to be captured so that they are reliable and sufficient as evidence of business transactions.
- ▶ Most contextual information is automatically generated by the e-mail application. However, some contextual elements such as subject and file reference number(s), given the current technology, need to be manually captured.
- ▶ Where contextual information needs to be manually generated, agencies need to have in place organisational policies and procedures that require end users to provide information for such elements. Such policies and procedures need to be supported by sufficient end user education and training as well as mechanisms that enable the monitoring of compliance.
- ▶ Each agency should have a policy and procedure on the version control of documents and records, including those generated within e-mail systems.

⁴ Some of the policy statements below have been adapted from the following - State Records Authority of New South Wales, *Electronic messages as records*: April 1998.

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- ▶ Each agency should have clear procedures for the adequate management of attachments as an integral part of e-mail messages.
- ▶ In using contractors or outsourcing arrangements for the performance of agency functions, each agency should include records management responsibilities within any agreements or contracts to satisfy legal and accountability requirements and to protect the interests of the agency and its stakeholders. As part of records management requirements, the management of e-mail messages as official records should be included.
- ▶ Each agency should stipulate in their e-mail policy and procedures methods of recourse for staff that do not comply with such policies and procedures.

E-mail messages need to be managed within a recordkeeping system

- ▶ E-mail messages that are official records of more than transitory value should be maintained in electronic form within a recordkeeping system. Such a system needs to allow for adequate capture, storage, maintenance and disposition and be supported by sufficient policies, procedures and staff⁵.

Official e-mail of more than transitory value needs to be managed through the complete continuum from creation to disposal. The records management continuum involves four main categories:

- ▶ creation,
- ▶ capture and control,
- ▶ retention and destruction,
- ▶ access and disclosure.
- ▶ If an agency is unable to maintain e-mail messages, as official records of more than transitory value, in electronic form, they should be printed in hard copy and incorporated into paper-based recordkeeping systems, such as correspondence filing systems. Such a method of capturing electronic records is not considered ideal, however, and should be instigated as an interim measure only⁶.
- ▶ Agencies that do not have in place adequate records management programs and systems for official records of more than transitory value are not complying with the State Records Act.
- ▶ Informal, non-business related messages are not required by the State Records Act to be captured into any form of recordkeeping system.
- ▶ E-mail messages that are official records of transitory value only are not required by the State Records Act to be captured into any form of corporate recordkeeping system.

⁵ In choosing a software solution, agencies need to consider how the system handles: the identification of e-mail messages as records, the electronic format in which e-mail is saved, as well as its associated attachments, the way in which index terms are generated and contextual information is saved, the way in which an e-mail message is perpetually linked to its associated attachments, the way in which e-mail as official records are integrated with all other records in the filing system, the way in which disposition is assigned, the way in which destruction is recorded, the way in which authenticity is preserved.

⁶ With some e-mail systems it is possible for the recipient of a message to change that message (and print it out) without the sender's knowledge. Printed e-mails from such systems would be questionable as legal evidence

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E-mail messages should be appropriately disposed of depending on their value as records

- ▶ E-mail messages that are of a transitory or ephemeral nature can be destroyed in accordance with Normal Administrative Practice (NAP)⁷. Such messages have no ongoing value and should not be incorporated into the agency's recordkeeping system/s.
- ▶ E-mail messages that are of a transitory or ephemeral nature should be deleted as soon as possible, perhaps as part of a 30, 60 or 90 day purge. Each agency should have in place a policy and procedure for deleting such e-mail messages.
- ▶ Other e-mail messages that are official records are required to be sentenced in accordance with approved disposal schedules. Official records, irrespective of format, cannot be disposed of unless an approved disposal schedule is used.
- ▶ E-mail messages which are official records and which are deemed to be of temporary value (more than transitory value but less than ongoing/permanent value) should be destroyed when the required retention period has expired.
- ▶ E-mail messages, as official records of continuing or enduring value, need to be managed to ensure ongoing accessibility over time.
- ▶ Responsibility for destroying e-mail messages that are official records of more than transitory value should be the responsibility of the systems administrator or records manager. This is to ensure appropriate application of disposal schedules and adequate documentation of destruction, migration or transfer to State Records. If (because of decentralised systems) individual e-mail users are given such responsibility, agencies need to provide training and ensure periodic monitoring of disposal actions.

E-mail messages, as records, should be appropriately stored and protected

- ▶ Back-up tapes should not be considered as a sufficient and adequate method of recordkeeping nor secondary storage for e-mail messages that are official records of more than transitory value.
- ▶ Appropriate accessibility measures for agency personnel (taking into account security considerations, information sensitivities, etc) should be in place to ensure ongoing retrievability of corporate memory and consequently to allow informed decision-making.
- ▶ System audit trails relating to access should be conducted on a routine basis to monitor the security of any electronic systems within which official records of more than transitory value are maintained and to ensure no impropriety regarding disclosure takes place. System administrators should conduct such auditing.
- ▶ Official records designated for long-term or permanent retention are required to be “managed proactively to remain accessible and authentic over time, through refreshing of media and migrations across software and hardware platforms”⁸.

⁷ For information regarding Normal Administrative Practice refer to Attachment 2.

⁸ National Archives of Australia. *Managing electronic messages as records: Policy and guidelines*. May 1997. ACT. p.4.

Managing e-mail messages as official records: Guidelines

Frequently Asked Questions⁹

Q1. Are e-mail messages official records?

A 'record' as defined by section 3 of the State Records Act, means written, graphic or pictorial matter, or a disk, tape, film, or other object that contains information or from which information may be reproduced (with or without the aid of another object or device). Given this definition, e-mail messages are records. Are they, however, 'official records'?

E-mail messages are 'official records', as defined by the State Records Act, when they are made or received in the *conduct of agency business*.

Q2. How do I tell when e-mail is an official record?

Documents and information are official records if they are made or received in the conduct of agency business. Such business may be the provision of services, delivery of programs, development of policies, making of decisions, performance of agency functions and other similar types of transactions.

As an agency employee you need to determine whether the e-mail message relates to you as an individual, and is therefore informal and *not* an official record, or to your official duties, and is therefore formal or business-related and *is* an official record.

The State Records Act defines further instances where e-mail messages are *not* official records. This is when they are -

- ▶ a record made or received by an agency for delivery or transmission to another person or body (other than an agency) and so delivered or transmitted; or
- ▶ a record made by an agency as a draft only and not for further use or reference; or
- ▶ a record received into or made for the collection of a library, museum or art gallery and not otherwise associated with the business of the agency; or
- ▶ a Commonwealth record as defined by the Archives Act 1983 of the Commonwealth...; or
- ▶ a record that has been transferred to the Commonwealth¹⁰.

As you would expect, most e-mail that you receive at work (as with other communications) is official.

⁹ Some of the 'frequently asked questions' included have been adopted or adapted from the following – Edwards US Air Force Base, *Email and official records: Frequently Asked Questions*:

<http://www.edwards.af.mil/pim/imqr/emcover.htm>. Accessed 17 February 2000

¹⁰ *State Records Act 1997*, s.3(1)

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Q3. If an e-mail message is an official record, what do I need to do?

If an e-mail message is an official record, you will need to ascertain whether it is of *transitory value only* or of *more than transitory value*.

If it is of *transitory value only*, an e-mail message can be destroyed according to Normal Administrative Practice (NAP). This provides for the routine destruction of drafts, duplicates, publications and ephemera with the test that it is obvious that *no information of continuing value to the organisation* will be destroyed.

E-mail messages that can be destroyed under NAP comprise items of a transitory nature created, acquired or collected by agency officers in the course of their official duties. Such messages have no ongoing value and should not be incorporated into the agency's recordkeeping system/s. As part of adequate records management practice, such messages should be deleted as soon as possible. This may be accomplished as part of a 30, 60 or 90-day purge¹¹.

E-mail messages that are official records of *more than transitory value* need to have applied appropriate records management principles and practices. These include adequate creation, capture and control, retention and destruction, access and disclosure.

Appropriate actions will depend on the options available and the systems established within your agency. Ideally, e-mail messages that are official records of more than transitory value should be maintained in electronic form within a recordkeeping system that allows for sufficient storage, maintenance and disposition. Further guidance is provided in the next section *Managing e-mail messages as official records: Interim technical solutions for e-mail - "Capture" and storage*.

If your agency does not have such capability, e-mail messages that are official records of more than transitory value should be printed in hard copy and incorporated into paper-based recordkeeping systems, such as correspondence filing systems. However, printing e-mail messages should be a last resort and does not guarantee that an agency will be adequately guarding itself against legal, financial or accountability risk or loss.

Agencies that do not have in place adequate records management programs and systems are not complying with the State Records Act.

Q4. Are there special requirements for e-mail messages that are official records?

In general, e-mail messages that are official records of more than transitory value should be managed to the same degree as other official records, irrespective of medium. However, there are some particular requirements peculiar to e-mail messages.

Both the *content* and the *context* of e-mail messages that are official records of more than transitory value need to be captured. Contextual data includes date and time of sending and

¹¹ See Attachment 2 for further details about the types of official records that can be destroyed according to NAP.

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receipt, subject heading, the name, position and contact details of sender and recipient, copies to other people, links to replies, appropriate file reference numbers. Much of this contextual information is system-generated and therefore automatic. However, subject heading, position and contact details of sender and recipient and file reference numbers need to be manually created¹².

Your agency should have in place business rules and conventions that require you to create and capture sufficient contextual information¹³.

Q5. What about attachments to e-mail messages that are official records? Do I have to keep them as well?

Attachments are required to be kept as part of the e-mail message where they form part of the content, intent and/or context of the message. Attachments need to be saved as part of the e-mail message where not saving would mean loss of meaning, integrity or completeness.

As an alternative to attachments, your agency may have in place the capability to include links to a single master copy held in a central repository. In such instances, there would be a minimal need to include attachments when conducting official business.

Q6. If an e-mail message is filed elsewhere, do I still have to keep my copy?

It depends on where the e-mail record is filed. If the e-mail message is an official record of more than transitory value and it is captured into a recordkeeping system that meets accountability and records management requirements, your copy can be treated as for your information only and therefore deleted once reference ceases.

Q7. If e-mail messages are sent back and forth and the most recent has the entire sequence of messages, can I save only the most recent and delete the rest?

The most recent message that has the entire sequence of messages can be saved and the rest deleted as long as all the transactions and transmission data for each individual message are captured in the aggregated version. In other words, details of all senders and recipients, dates and times of the various messages sent and received, and any attachments as well as the actual content of the various related messages all need to be incorporated in the message to be saved. Also ensure that the subject header is completed for at least the consolidated version.

The earlier messages that were part of the sequence of transactions are then only of transitory value and can be destroyed in accordance with Normal Administrative Practice.

¹² See Attachment 3 for further details regarding contextual information.

¹³ For example, corporate style templates may be set up to standardise message layout and facilitate the capture of additional information such as file/reference numbers. In addition, classification schemes may be in place which require key terms to be used within the subject field.

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It should be noted, however, that limitations of current systems may not enable the integrity of a consolidated message to be assured. In such instances to mitigate risk the entire sequence of messages, with appropriate contextual information, should be saved.

Q8. How long do I need to keep my e-mail messages that are official records?

As previously discussed, e-mail messages that are official records of transitory value only, should be routinely destroyed according to Normal Administrative Practice. This may be accomplished as part of a 30, 60 or 90-day purge¹⁴.

E-mail messages as official records of more than transitory value are required to be sentenced in accordance with approved disposal schedules. General Disposal Schedules (GDS) need to be used for official records relating to common administrative or housekeeping functions and activities, eg Personnel Management, Fleet Management, Community Relations, Property Management, etc. Operational Records Disposal Schedules (RDS) are used for agency-specific records. Official records, irrespective of format, cannot be disposed of unless an approved disposal schedule is used.

E-mail as official records of continuing or enduring value need to be managed to ensure ongoing accessibility over time¹⁵.

Responsibility for destroying e-mail messages that are official records of more than transitory value should be the responsibility of the Systems Administrator or Records Manager in order to ensure appropriate application of disposal schedules and adequate documentation of destruction, migration or transfer to State Records. Individual e-mail users should not be given such responsibility.

Q9. Are e-mail systems reliable enough for transmitting official records?

“E-mail provides a high level of reliability for end-to-end transmission of messages. However, current e-mail products generally do not address requirements for reliable records, eg authenticating the sender’s identity and preventing alteration of contents”¹⁶.

It should be clearly stated in agency procedures when it is appropriate to use e-mail systems to generate or transmit official records. Official records which are strictly confidential in nature, require authorisation and/or verification, have privacy implications, or are of a legally sensitive nature may need to be generated through some other more secure medium.

¹⁴ See Attachment 2 for further details about the types of official records that can be destroyed according to NAP.

¹⁵ The *State Records Act* provides a legal obligation for agencies to ensure this. The definition of “dispose of” includes “carry out an act as a result of which it is no longer possible or reasonably practicable to reproduce the whole or a part of the information contained in the record.”

¹⁶ Edwards Air Force Base. *E-mail and official records: Frequently Asked Questions*. <<http://www.edwards.af.mil/pim/imqr/emcover.htm>>. Accessed 17 February 2000. p. 2 of 6.

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“Employees should be able to apply such guidance systematically and consistently, and should not be required to make ad hoc or case by case decisions”¹⁷ about e-mail as a form of appropriate or inappropriate transmission.

Q10. Much of the e-mail I receive is of no use to me once I have read it. Why do I have to save it?

As an employee of the South Australian Government, your responsibilities go beyond your immediate needs. While you may not need to use the information in a message beyond a limited period, it may contain information that is necessary evidence of Government activities and decisions. E-mail messages that are official records of permanent value (as defined by a disposal schedule) will eventually be of interest to the wider community.

E-mail messages that are official records do not belong to the individual but are the property of the agency.

Q11. Where do I keep e-mail messages that are official records?

E-mail messages that are official records of transitory value only can be maintained within the e-mail application using personal folders. However, such folders should be routinely purged.

Personal folders should not be used for e-mail messages that are official records of more than transitory value.

You should store e-mail messages that are official records of more than transitory value in a recordkeeping system endorsed by your agency. An adequate recordkeeping system enables the capture, storage, maintenance, retention or destruction, access and disclosure of records. E-mail messages of more than transitory value ideally should be integrated with other records and have the same practices applied¹⁸.

Q12. How should electronic mail that is an official record be kept off-line?

Appropriate accessibility measures for agency personnel (taking into account security considerations, information sensitivities, etc.) should be in place to ensure ongoing retrievability of corporate memory and consequently to allow informed decision-making.

Official records of more than transitory value or which have been designated for long-term or permanent retention are required to be “managed proactively to remain accessible and authentic over time, through refreshing of media and migrations across software and

¹⁷ Standards Australia. AS4390:1996. *Records management, Part 3: Strategies*. 1996. p.14.

¹⁸ Most agencies do not currently have in place recordkeeping systems that enable the appropriate management of e-mail messages as official records. As an interim measure, agencies need to consider methods of effective capture and storage within the given technological environment (as outlined in the following section).

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hardware platforms”¹⁹. Those official records required to be kept permanently will need to be made accessible not only to agency staff but eventually to public researchers²⁰.

The design or modification and maintenance of systems that enable accessibility to official records is the responsibility of System Administrators/ IT Managers.

Q13. Is a comprehensive back-up system sufficient for storing e-mail?

Back-ups are created to facilitate restoration of a system or file in case of accidental or unintentional loss. All agencies should have in place standards for such systems management.

Back-ups, however, should not be considered as an appropriate and adequate method of recordkeeping or secondary storage for e-mail messages that are official records.

Q14. When adequate automated records management/document management software is available will electronic copies be sufficient, or will I still need to keep paper copies?

The key word is “adequate”. If your agency implements or has implemented an automated records management/document management application that is supported by appropriate policies, procedures and people and therefore satisfies adequate recordkeeping requirements, you will not need to duplicate records in paper form.

Q15. Does Freedom of Information apply to e-mail messages?

Yes. The Freedom of Information Act 1991 applies to official information, regardless of the technology used to create, store, or transmit that information. E-mail messages in their entirety are subject to FOI, but their release is subject to the same exemptions that apply to other official records. Erasure, accidental loss or deterioration of e-mail messages are not specified as exemptions for non-disclosure under the Freedom of Information Act.

Q16. What do I do about e-mail messages which contain sensitive information such as security classified or records affecting the privacy of individuals?

Commercial-in-Confidence protocols can apply. The Information Privacy Principles apply. You should adhere to the same standards, procedures and precautions for e-mail messages containing sensitive information as you would to the same information in any other medium. “E-mail systems should not be used to transmit any classified, staff-in-confidence or commercial-in-confidence material except where these systems have been established for such a purpose and have appropriate controls”²¹.

¹⁹ National Archives of Australia. *Managing electronic messages as records: Policy & guidelines*. May 1997. ACT. p.4.

²⁰ The *State Records Act* requires the delivery to State Records of any official record when it is fifteen years old or when the agency ceases to require access to the record for current administrative purposes. However, exemptions may be granted to agencies having “sufficient and adequate facilities for the proper storage and care of the records”.

²¹ National Archives of Australia. *Managing electronic messages as records...*,p.4. In addition, the general content and use of language within e-mail messages should comply with your agency’s code of conduct for employees.

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Q17. What if I do not comply with these guidelines?

Section 16 of the State Records Act stipulates that where an agency's records management practices are inadequate, the Manager [Director] of State Records will report the matter to the Minister.

If a person, knowing that they do not have proper authority to do so, intentionally damages or alters an official record or disposes of an official record or removes an official record from official custody, the person commits an offence. The maximum penalty for the individual is \$10,000 or imprisonment for two years. The definition of "dispose of" in the State Records Act includes "to carry out an act or process as a result of which it is no longer possible of reasonably practicable to reproduce the whole or a part of the information contained in the record"²²

Individual agencies may also stipulate in their specific policies and procedures methods of recourse for staff that do not comply with such policies and procedures.

Q18. Where can I get additional guidance?

The next section addresses two vital aspects of managing e-mail (capture and storage), pending a more extensive examination of electronic records management and the supporting systems requirements.

Enquiries regarding these guidelines should, in the first instance, be directed to:

State Records of South Australia
GPO Box 1072
ADELAIDE SA 5001
Phone: (08) 8204 8773
Fax: (08) 8204 8777
srsageneralenquiries@sa.gov.au
<http://www.archives.sa.gov.au>

You should also seek guidance from your agency's records manager with regard to agency-specific policies and procedures for the management of e-mail as official records.

²² *State Records Act 1997: s.3*

Managing e-mail messages as official records: Technical solutions for e-mail “capture” and storage

E-mail “capture” and storage – general considerations

E-mail messages that are official records of more than transitory value should be 'captured' and moved to storage as soon as possible after receipt to minimise the risk of loss or inadvertent destruction.

Ultimately 'automatic' mechanisms that support 'capture' and consequent transfer of non-transitory 'official' e-mail to longer-term storage need to be implemented by agencies, thus allowing users to effectively manage their mailboxes without concern for storage/capacity issues. While software is available that can filter e-mail, the filtering systems are not yet so effective as to remove the need for human involvement²³. Individual e-mail users need to still differentiate between 'official' and 'non-official' e-mail and ensure transfer to longer-term storage of those official e-mails of more than transitory value.

Integration of e-mail records of more than transitory value with other records and/or establishment of strong links into the more general records management system is preferable and ultimately necessary. However, the current situation where e-mail is not consistently captured, let alone managed through the entire continuum, poses an immediate risk that needs to be addressed. Retention and destruction, as well as control, processes will be considered later.

When deciding on the processes to be implemented, it should be noted that actions, including any requirements for capture, perceived by the e-mail user to be intrusive or time consuming are likely to be delayed or omitted. For instance, users are more likely to mark and delete messages when their mailbox reaches its capacity than spend time to ensure official e-mails of more than transitory value have been appropriately captured. A culture that supports records management, as well as training and audit processes, will have a positive effect on this situation²⁴.

Incremental approach – first stage

This first stage involves:

- ▶ identification of mechanisms for the capture of e-mail;
- ▶ ways to transfer e-mail to storage;
- ▶ storage options.

²³ Spennow, W. *E-mail content monitoring: No complete solution yet*. 11 October 1999. GartnerGroup

²⁴ Gilbert, M. McCoy, D. *Correspondence tracking: Mundane or mandatory?* 20 Aug 1998. GartnerGroup.

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Capture

Storage of *all* e-mail ensures that official records are captured but would require extensive storage capacity at considerable cost. A more realistic process is to filter e-mail at least to the extent of deciding whether it is official. In addition, enabling the end user to identify e-mail which is of transitory value only (ie within the scope of Normal Administrative Practice (NAP) in *General Disposal Schedule No. 15*)²⁵ will further reduce the volume of e-mail stored and make easier the retrieval of specific items.

Filtering e-mail

Some filtering is possible using content monitoring tools; however, a high degree of human input is still necessary as the software filters are not yet effective - they apply key word searches rather than determining context or intent.

Decisions need to be made about the 'depth' to which the capture process will be applied, when it will be applied and by whom. *In this initial (and interim) stage, the primary objective is to ensure the capture of all official e-mail of more than transitory value.* Grouping of the remaining e-mail records into disposal classes would need to be done at a later stage.

Transferring e-mail to storage

Once official e-mail of more than transitory value is identified, it can be transferred from the Inbox to a specific storage location²⁶. Transfer can be effected by manual or 'automatic' processes. (Refer to Attachment 4 for more detail.) In each of these options, action officers will need to be trained to identify the differences between transitory official e-mail and official e-mail of more than transitory value.

Manual transfer

E-mail users are able to 'click and drag' or 'copy and paste' records to a designated location. This process relies on the individual to take time to complete the action.

Automatic transfer

A degree of automation can be achieved in the transfer process. However, the effectiveness is limited by the capacity of current content filtering applications.

Mailbox wizards – inbox and sent items

Individual e-mail users can set up mailbox 'wizards' that apply user specified rules to incoming and/or outgoing e-mail that consign copies of these e-mails to designated storage

²⁵ See Attachment 2 for further information regarding Normal Administrative Practice.

²⁶ E-mail that is of a personal or transitory official nature can remain within the end user's personal folders to be deleted on a regular basis.

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locations. Given that the wizards will not capture all relevant e-mail, users will also need to monitor the 'success' of the filtering process and manually transfer records and set up additional wizards as necessary.

Conventions or business rules need to be established by individual agencies that specify who should action the capture and storage of e-mail²⁷.

Software initiated filtering

Software can be established on the server to filter all e-mail and transfer copies of e-mail meeting specified criteria to storage. The effectiveness of this process is in doubt, particularly as individual e-mail users are removed from the process and unable to add their local knowledge of context and intent to the monitoring process. Significant resources would be required to monitor the process centrally.

'Forced' filtering by e-mail users

The e-mail application can be altered so that e-mail users complete certain actions before mail can be sent and/or closed. This will require the user to assess e-mails to a certain level (eg indicate 'personal and non-official', 'transitory official record' or 'official record of more than transitory value'). Copies of the e-mails are transferred to designated locations based on this choice and other associated criteria (eg action officer's workgroup). Costs associated with this option include software alteration, rollout and training.

Storage options

Storage mechanisms need to provide appropriate security and access levels to facilitate retrieval of records and ensure their integrity. Systematic backup is needed, and cost and capacity issues should be deciding factors in the choice of storage option. Issues associated with storage capacity management will need to be considered in both the short and longer term²⁸ (Refer to Attachment 5 for details).

Workgroup mailbox

Mailboxes can be set up to which e-mail users carbon-copy official e-mail of more than transitory value. This storage option is simple and low cost although the dispersed location of the records makes searching across multiple workgroup mailboxes difficult.

Personal folders

Personal folders can be set up by each action officer using the functionality of the messaging program into which non-transitory official e-mails can be transferred manually and/or using

²⁷ See Attachment 6 for suggestions on the assignment of responsibility for capturing and storing e-mail messages based on different situations of receiving and sending.

²⁸ Nicolette, M. Claps, C. *Storage resource management for distributed systems*. 12 November 1999. GartnerGroup.

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mailbox 'wizards'. This option raises particular concerns regarding limitations of access. In order to ensure systematic backup, it is essential the personal folders are located on a central system rather than local hard drives.

Public folders

By locating records in a more central location access and backup issues can be better addressed.

Shared public folders on 'local' servers

Shared public folders can be established 'locally' (eg Microsoft Exchange public folders on existing SAGEMS infrastructure or directories on local network) into which copies of e-mails are transferred manually and/or using e-mail 'wizards'. Capacity issues may arise where longer-term storage is set up on mail servers, so it may be advisable to transfer records to another location or format after a designated period eg 90 days.

Shared public folders on 'dedicated' servers

By using dedicated file servers, effective longer-term storage can be achieved without affecting the performance of mail servers. The dedicated file servers would be configured for lower traffic and high storage and support appropriate levels of access and security and systematic backup. Storage costs need to be considered, particularly where outsourcing issues arise. Given a server with 40 Gig available capacity, and 600 users generating 5 Meg of official mail per month, the server would reach capacity in 12 months²⁹. Alternative formats could be used for storage of mail after a designated period.

Intranet web site

Longer-term storage of records can be achieved using 'closed' web sites established on an intranet with appropriate levels of access and security. There is also a marked trend toward development of web-based interfaces through which users gain access to information, a trend that is being mirrored by vendors of recordkeeping systems. Further investigation of options for web based storage and access to information is recommended.

Document management systems

Mature and comprehensive document management systems are available that will support the full records management continuum. Integration of e-mail records into such a system is the goal, particularly as 'gateways' can be established between e-mail applications (eg Microsoft Outlook) and document management systems. A robust document management system supports appropriate levels of access and security, even to the point of being able to restrict access to portions of documents, along with providing complex search functions. The vendors also address issues including continuous migration of records into formats that can be read by current technology. In choosing an interim strategy to capture and store official e-

²⁹ The annual cost for 600 users would be in the order of \$60,000 (or \$100 per user).

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mail of more than transitory value, the need to integrate the records into a document management system later should be considered.

SAGEMS environment

Potential exists for use of the SAGEMS / Microsoft Exchange infrastructure to support interim e-mail management strategies. Issues including capacity and costs associated with outsourcing need to be considered.

Conclusion

These interim technical solutions contain a significant innovation. This is the involvement of e-mail users in the decision about whether an e-mail is 'official' *and* in determining whether or not an official e-mail has transitory significance only (i.e. that its characteristics meet those prescribed in the Normal Administrative Procedures (NAP) provisions of the General Disposal Schedules applicable to state and local government). In recent discussions, Gartner Group indicated that most organisations either do not store e-mail or store all e-mail and then delete records after a specified period (eg 90 days).

Once policies and processes associated with document and records management in the South Australian Government are agreed, new software applications for e-mail management and/or records/document management systems can be further explored. The SAGEMS infrastructure can accommodate all the solutions noted above, subject to exploration of certain security issues associated with outsourcing.

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Glossary

State Records has produced an extensive Glossary of Records Management Terms. This can be accessed and downloaded from the Adequate Records Management, publications section of the State Records website, <http://www.archives.sa.gov.au>

Attachment 1

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Attachment 2

Normal Administrative Practice³⁰

Normal Administrative Practice (NAP) is the concept that material can be destroyed according to "normal administrative practices". This provides for the routine destruction of drafts, duplicates and publications, with the test that it is obvious that no information of more than transitory value (including permanent value) to the organisation will be destroyed. NAP is formally authorised by the *General Disposal Schedule No. 15 for State Government Agencies in South Australia* and the *General Disposal Schedule for Local Government Authorities in South Australia*. NAP is intended to enable agencies to carry out a number of everyday, common sense procedures and practices.

Material that can be disposed of under NAP comprises items of an ephemeral³¹ or transitory nature created, acquired, or collected by agency officers in the course of their official duties. Such material has no ongoing value and is not incorporated into the agency recordkeeping system.

NAP falls into six main groups:

- ▶ transitory or short term items, eg phone messages, notes, compliment slips, office notices and circulars;
- ▶ rough working papers and/or calculations created in preparation of formal drafts or final versions;
- ▶ drafts not intended for further use or reference, excluding drafts of more than transitory value relating to agreements, submissions, contracts and other legal documents;
- ▶ duplicate copies of material retained for reference purposes only;
- ▶ published material which does not form an integral part of an official record of more than transitory value;
- ▶ system printouts used to verify or monitor data, or answer adhoc queries, that are not part of regular reporting procedures and not required for ongoing use.

To further illustrate the six main groups outlined above, particular items that may be destroyed under NAP include:

- ▶ drafts, rough notes and calculations used for the preparation of such documents as budget documents, charts, correspondence, file notes, minutes, reports, spreadsheets, tabulations;
- ▶ brochures, catalogues, price lists, unsolicited promotional material, etc received from external sources;

³⁰ Adapted from State Records of South Australia. *General Disposal Schedule No. 15 for State Government Agencies in South Australia*. Second Edition. June 1999. *State Records of New South Wales. Normal Administrative Practice*. February 1999.

³¹ Ephemeral records means records of little value that only need to be kept for a limited or short period of time. Ephemeral records have no ongoing value to the organisation and, generally, are only needed for a few hours or few days.

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- ▶ calendars, appointment schedules, etc that are not core attendance records;
- ▶ superseded copies of instructions, guidelines, standards, etc not included in a general or agency records disposal schedule;
- ▶ extra copies or duplicates of records required for reference purposes only;
- ▶ copies of published items kept for reference purposes, eg internal or external annual reports.

In applying NAP to e-mail messages, always ask:

- ▶ does the message form part of an agency transaction?
- ▶ does it add value to an existing record?
- ▶ does it show how an agency transaction was dealt with?
- ▶ does it show how an agency decision was made?
- ▶ does it show when or where an agency event happened?
- ▶ does it indicate who was involved or what advice was given?
- ▶ is it a formal draft of a cabinet submission, an agreement or legal document?

If the answer to any of these questions is **YES** then the message *cannot be destroyed according to NAP*.

Agencies should produce internal policies and procedures to further define what are meant by normal administrative practices for their own organisation. For example, an agency will need to clarify how they define 'drafts of more than transitory value relating to agreements, submissions, contracts and other legal documents'. Such policies and procedures should then be circulated to all agency staff so that they are aware of their records management responsibilities.

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Attachment 3

Minimum contextual information for e-mail messages

<i>E-mail transmission data element</i>	<i>Sub-elements</i>	<i>Example</i>	<i>(S) or (M) *</i>	
E-mail sender name	Personal Name	Brown, John John Brown	S	Additional elements of personal name, position, corporate name, contact and email address can be captured as an automatic signature, requiring a once-off set up.
	Position	Archivist	M	
	Corporate Name	State Records	M	
	Contact	Ph: +61 8 8343 6800	M	
	E-mail Address	b.joe@saugov.sa.gov.au	M	
E-mail recipient(s) <i>(includes primary recipient and secondary recipients to whom copies are sent for information)</i>	Personal Name	Smith, Alan Alan Smith	S	If taken from a Circulation List (eg SAGEMS global address book) additional elements of personal name, position, corporate name, contact and email address are available in "details".
	Position	Manager, Strategic Planning	M	
	Corporate Name	DAIS	M	
	Contact	Ph: +61 8 8226 5000	M	
	E-mail Address	smith,@sau.gov.sa.gov.au	M	
Date/ time of transmission	Day	Monday, 12	S	Automatic date-stamp.
	Month	February	S	
	Year	2000	S	
	Hour	1300	S	
	Minutes	1315	S	
	Seconds	1315:22	S	

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<i>E-mail transmission data element</i>	<i>Sub-elements</i>	<i>Example</i>	<i>(S) or (M) *</i>	
Date/time of e-mail receipt	Day	Monday, 12	S	Automatic date-stamp.
	Month	February	S	
	Year	2000	S	
	Hour	1300	S	
	Minutes	1315	S	
	Seconds	1315:22	S	
Subject/Title line	Free text or thesaurus terms	Minutes of Strategic Planning Meeting of 23-01-2000 Strategic Management - Meetings - Minutes	M	Agency policy and procedure required, stipulating that the completion of the subject line is mandatory. As interim solution, free text is sufficient as long as message is captured into a folder where naming conventions have been defined.
	File Reference Number(s) <i>(Electronic &/or Hard Copy Folder(s))</i>	Various (depending on numbering system used in agency) eg AS21/2000	M	

* S= system-generated; M=manually-generated

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Attachment 4

Options for transfer of e-mail records to storage

Transfer of E-mail to storage - manual or 'automated'		
Solution	Description	Comments
Manual transfer	action officer analyses incoming and outgoing e-mail, drags copy of e-mail to appropriate location	<ul style="list-style-type: none"> ▶ relies on individual remembering/taking time to do manual transfer of e-mail ▶ auditing of integrity of capture of all official records is difficult - no systematic way to assess content of individual mailboxes
'Automated' transfer <ul style="list-style-type: none"> • Mailbox Wizards - inbox and sent items (on client side) 	<ul style="list-style-type: none"> • individual action officers set up 'wizards' that filter e-mail as it is sent and/or received and transfer copies of the relevant e-mails to designated storage locations 	<ul style="list-style-type: none"> • individual action officers set up and maintain appropriate mailbox wizards to filter and transfer records • filters based on specific criterion eg designated words in text, certain addresses in TO: field <p>NOTE: filtering is not completely effective as systems do not determine context or intent of message ¹</p> <ul style="list-style-type: none"> • individual action officers monitor 'success' of filtering process, manually transfer records and set up additional wizards as required • auditing of integrity of capture of all official records is difficult - no systematic way to assess content of individual mailboxes