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State Records  
of South Australia



# Adequate Records Management Standard

Standard

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## Introduction

### Why is records management important?

Records management is one of a number of important 'administrative' activities of agencies that support their core business.

The administrative need for good records management is reinforced by legislation.

The *State Records Act 1997* has among its objects:

- to promote the observance of best practices by agencies in their management of official records.<sup>1</sup>

The *Local Government Act 1999* requires that the functions of the Chief Executive Officer include:

- to ensure that records required by this or another Act are properly kept and maintained<sup>2</sup>.

Good records management has a number of effects including:

- informed policy and decision making, and planning for the delivery of services
- good risk management and corporate governance
- enhanced operational effectiveness
- increased client satisfaction
- better management and delivery of services
- increased productivity
- increased accountability
- improved access to and sharing of corporate information
- improved ability to meet community expectations.

Poor records management conversely has a number of effects and these include:

- a lack of available information
- poor decision making as a result of bad or incomplete information
- wasted time
- wasted financial resources for the storage of records
- severe legal liabilities
- increased corporate risk
- substandard client service provision
- a lack of quality systems.

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<sup>1</sup> *State Records Act 1997*, Section 5 (c).

<sup>2</sup> *Local Government Act 1999*, Section 99 (1), (h).

## What is the ‘Adequate Records Management Framework’?

The Adequate Records Management Framework is an Across-Government framework that signifies a new records management regime for both state and local government agencies within South Australia. It has been developed to meet the broad goals of the State Records Act and the Local Government Act described above as well as the particular goal in section 16 of the State Records Act that states:

- If the Manager [Director] [of State Records] is of the opinion that the records management practices of an agency are inadequate, the Manager [Director] is required to report the matter to the Minister.<sup>3</sup>

State Records defines the ‘inadequate records management practices’ of section 16 of the State Records Act as failure by agencies to meet the following ten operational and strategic Adequate Records Management Outcomes for Government:

- official records are created
- official records are captured
- official records are disposed of systematically
- access to official records is managed
- official records can be found
- official records can be relied upon
- the management of official records is planned
- records management training is provided to staff
- records management reporting mechanisms are implemented
- policies, procedures and practices exist for the management of official records.

The outcomes are heavily inter-related and combine into a structured records management program. If these outcomes are met, then an agency will have a functioning adequate records management program in terms of section 16 of the State Records Act.

The outcomes can be met by agencies no matter what their function, size, location, resourcing, or records management practices and staff awareness of records management.

## What is the purpose of this standard?

Meeting the Standard<sup>4</sup> has been developed to describe the adequate records management framework and give specific details of what the records management programs of

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<sup>3</sup> *State Records Act 1997*, Section 16.

<sup>4</sup> This document has been developed with reference to several similar tools developed by a number of institutions, including *Australian Standard Records Management AS4390-1996*; *Australian Standard Records Management AS ISO15489-2002*; *Standard on Full and Accurate Records*, State Records Authority of New South Wales, 1998; *Standard on Records Management Programs*, State Records Authority of New South Wales, 1998; *Corporate Memory in the Electronic Age*, Australian Council of Archives, 1996. Each of these documents is recognised by State Records as a current industry code of best practice.

agencies need to do in order to be adequate. It is issued as a mandatory standard approved by the Minister in accordance with sections 7(h) and 14 of the State Records Act.

*Meeting the Standard* contains the outcomes for an adequate records management program, supporting policy statements, explanations of the outcomes, and the benchmarks which agencies are required to progressively meet in order to be considered adequate.

*Meeting the Standard* is derived in part from the *Australian Standard Records Management AS4390-1996* and its successor *Australian Standard Records Management AS ISO15489-2002*. State Records recommends the use of *AS ISO15489-2002* when agencies are discussing and planning their internal records management practices and programs.

*Meeting the Standard* is not a tool for planning the implementation of records management software. Agencies intending to install such software should contact the vendors or State Records for advice on implementation plans and tools.

## **How will agencies use this standard?**

Agencies need to ensure that they can progressively satisfy the benchmarks in this document. This may involve establishing records management programs, modifying existing programs or, in some cases, merely confirming current programs against the stated benchmarks. State Records is looking for planned and continuous improvement over time.

## **How will State Records use this standard?**

State Records requires that a records management program be in place within each agency in South Australia. The program has to perform certain minimum functions or activities and be supported by records management policies and procedures, as benchmarked in this document. Agencies are encouraged to exceed these benchmarks.

State Records conducts formal monitoring to ensure that agencies are achieving the outcomes. The monitoring entails a combination of random and targeted reviews of specific agencies over any given period.

Agencies will be expected to conduct an initial independent assessment of their records management systems, programs, practices and resources before formal monitoring begins. State Records' *Improvement Matrix* should help with this assessment.

An agency can use the matrix to make a realistic determination of its existing level of records management effectiveness.

As a first step, agencies will need to have conducted an assessment of their recordkeeping program according to the requirements of this standard.

Following the assessment agencies will be expected to progressively address areas of their records management that currently do not accord with *Meeting the Standard*, and demonstrate that improvements are taking place with the intention of achieving adequate records management.

If an agency is found not to be pursuing necessary continuous improvement, in the first instance an explanatory letter will be forwarded to the Chief Executive of the agency describing the findings. If agreed improvement is still not forthcoming within negotiated timeframes then the Manager [Director] of State Records will prepare a report to the Minister, under section 16 of the State Records Act.

It is also important to be aware that section 15 of the State Records Act empowers State Records to conduct surveys. In addition, State Records is obligated by the State Records Act to provide advice and assistance to agencies on their records management practices. The surveys and advice are separate from formal monitoring.

## **Related documents**

*Meeting the Standard* is complemented by two guideline documents:

- *Improvement Matrix* – a guideline for assessing the adequacy of agencies' existing records management systems, programs, practices and resources
- *Implementation Plan* – a guideline that provides a generic plan for implementing an adequate records management program.

*Meeting the Standard* is also supported by a set of Recordkeeping Advice Sheets that provide further advice and detail about each of the adequate outcomes.

## **Variation to this standard**

This standard was originally approved by the Minister for Administrative Services on 03 May 2002. State Records may update or alter *Meeting the Standard* from time to time with the authorisation of 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. Version 2.5 of this Standard reflects this requirement.

## Adequate records management outcomes

This section states each of the eleven Adequate Records Management Outcomes. Each outcome is supported by a policy and an explanation, followed by easily quantifiable benchmarks.

As part of its formal monitoring of agencies in progressively satisfying the benchmarks, State Records will inform agencies of the results and identify areas of their records management programs that require attention. Agencies need to then plan and implement a project to analyse and address the identified issues.

Agencies also need to identify whether their staff have sufficient capabilities to address the problems, for example meeting the levels of expertise specified in the *Archives and Records Management Competency Standard*.<sup>5</sup> If such staff cannot be identified agencies could consider using appropriate records management consultants. A number of private records management consultants currently work in South Australia, and State Records can help identify them. State Records also offers a records management consultancy service but agencies are not obliged to use this service.

The reported results of the monitoring of records management programs will make a useful tool for defining the parameters of any records management consultancy. If an agency has no records management program in place, and lacks the human resources to initiate such a program, the outcomes and benchmarks in this document provide the basis for the task and for engaging a consultant to help establish a structured records management program.

### Outcome 1 – Records are created

#### Policy

*Official records need to be created in all instances where there is a need for an agency or individual to be accountable for, and/or provide evidence of, decisions made and actions taken.*

#### Explanation

Official records contain the evidence of decisions made, procedures enacted and policies developed by agencies. They are essential for proving what was said, done or approved. Therefore agencies are required to create official records – as an automatic outcome of the transaction of business, or by modified business practices that ensure official records are created. Official records are also created when the agency receives documents and they are incorporated into the agency's records. As records are often the primary source of information for an agency tracking its business, official records are created whenever

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<sup>5</sup> The Competency Standard, developed by the National Records Competency Standard Steering Committee with the assistance of the Financial Services Industry Training Advisory Board in 1995–1997, identifies competencies for record keepers within a seven level matrix. The Standard is used to help establish training packages for records keepers within the Australian Training Framework and accredit training service providers and assessors.

evidence of business activity is required. Failure to do so may leave evidence of the agency's business affairs incomplete and expose the agency to increased liabilities.

South Australian Government agencies have a wide range of administrative and legal requirements for the creation of specific official records, for example, the classes and types of records of South Australia Police will be different from those of the South Australian Community Housing Authority.

Similarly, the manner in which official records are created will differ among agencies, particularly in the use of technology. Agencies need not equate the means of creating official records directly to the adequacy of the official records being created. No matter how records are created, proper control needs to be exercised over their creation.

### **Benchmarks**

- The agency identifies and documents any specific legislative or administrative requirements to create particular official records.
- The agency assigns responsibility for its official records creation.
- The agency informs all staff of their obligations to create specific official records as stated in legislative or administrative instruments.
- The agency reviews business processes to ensure that all official records that are required to be created, are created.
- The agency informs all staff of the need to create official records on transaction of business, or as soon as practicable afterwards.

## **Outcome 2 – Records are captured**

### **Policy**

*Official records should be captured into corporate recordkeeping systems upon creation or receipt, or as soon as practicable afterwards.*

### **Explanation**

Given the quantity and importance of official records created in an agency it is essential that they be captured into recordkeeping systems upon creation or receipt in a controlled and systematic manner. Failure to do this will contribute to the loss of official records and the inability to make informed decisions. A recordkeeping system may include, but not be limited to, dedicated records management software (such as Trim or RecFind), a finance management system or a customer relations database.

Certain business systems in use may automatically lead to the capture of an official record, for example an invoice generated for payment by a customer. Other systems may require intervention to ensure that an official record is captured. Agencies may have entirely manual systems in place that capture official records and thus operate as recordkeeping systems.

Not all agencies will have identical business needs to capture official records; this will be driven by the business activities of the agency and records management software, levels of information technology and records management practices used by the agency.

## Benchmarks

- The agency identifies and documents any specific administrative or legal requirements for staff to capture official records.
- The agency assigns responsibility for the capture of official records of the agency.
- The agency informs all staff of the need to capture official records into recordkeeping systems upon creation or receipt, or as soon as practicable afterwards.
- The agency identifies the crucial points in its business transactions where official records need to be captured.
- Official records of the agency are assigned unique identifiers upon capture.
- The agency reviews business processes to ensure that all official records that ought to be captured, are captured.

## Outcome 3 – Records are disposed of systematically

### Policy

*All official records of the agency shall be disposed of in accordance with the provisions of the State Records Act.*

### Explanation

Official records may have short or long term value depending on the information they contain and agencies are required to ensure that their official records are retained for as long as they are needed. However, once this use has been finalised the official records cannot simply be destroyed.

Unauthorised destruction of official records is an offence under section 24 of the State Records Act. It may well leave an agency open to longer-term litigation, financial loss and political embarrassment.

Agencies are required to notify State Records 14 days prior to the destruction of official records. Subsequent disposal of these records is only permissible once the agency has received written approval from State Records.

One of State Records' central functions is to apply a longer-term perspective to official records and it is thus involved in decisions about the need to keep official records for the long or short term.

Retention timeframes should apply to all official records in all formats. Electronic official records are subject to the same disposal requirements as paper based files, and as they depend on frequently changeable technology their retention, and destruction, needs to be a well considered process.

### Benchmarks

- The agency assigns responsibility for the disposal of official records.
- The agency informs all staff of the need to dispose of official records in accordance with the provisions of the State Records Act.
- Approved and current disposal schedules cover all official records of the agency.

- The agency sentences records against an approved and current disposal schedule.
- The agency conducts regular official records disposal programs.
- The agency coordinates its official records disposal program.
- The agency disposes of official records only in accordance with determinations made by the Manager [Director] of State Records.
- The agency keeps a record of the official records that it has destroyed and notifies State Records prior to destruction.
- The agency keeps a record of official records being held off site, for short and long-term retention.
- The agency reviews business processes to ensure that all official records that ought to be disposed of, are disposed of.
- The agency routinely reviews its records disposal schedules and revisions are approved by the State Records Council.

## **Outcome 4 – Access to records is managed**

### **Policy**

*The agency shall ensure that all access to official records takes place in a managed manner using prescribed policies and procedures.*

### **Explanation**

The official records of an agency contain information that may be accessed for the current operational needs of the agency, for research by the agency into the background of previous decisions, by members of the South Australian public exercising their rights to access official records under the FOI legislation, and by historical and other researchers. The public may access official records held by State Records under the provisions of section 26 of the *State Records Act*. Information contained within the official record may require disclosure control for reasons of:

- security
- personal privacy
- state to state, and state to foreign nation security
- commercial confidentiality
- legal liability.

Access to official records and the disclosure of the information within them, therefore, needs to be systematic, considered and consistent. The indiscriminate release of, or refusal to release, information may infringe on the rights of individuals, or the state, and cause severe liabilities for the agency.

### **Benchmarks**

- The agency assigns responsibility for providing access to official records, and disclosing the information they contain.
- The agency develops criteria for assessing requests for access to, and disclosure of information within, official records.

- The agency identifies and documents security issues governing the release of information within its records.
- The agency has processes in place to ensure that access to official records does not compromise the reliability of the records.
- The agency identifies and documents any commercial confidentiality agreements to which it is a party governing the release of information within its records.
- The agency has processes in place to seek legal advice where the provision of access to, and the release of information from, its records is likely to expose the agency to legal liabilities.
- The agency develops public access determinations for official records held in the custody of State Records.

## **Outcome 5 – Records can be found**

### **Policy**

*Specific official records should be able to be found on demand, or with the minimum extra effort.*

### **Explanation**

An agency's ability to find its official records upon demand will have a significant impact on the transaction of its business. A complete official record is of little use if it cannot be identified and retrieved as needed. An agency that can retrieve records on demand will lose less staff time and reduce costs, more than an agency that cannot. An efficient and effective retrieval system is an invaluable asset to the agency.

Tools to help agencies find their official records will vary depending on the agency's size and activities. A large department, such as Transport SA, may use automated records management software that is managed centrally. A smaller agency, such as the Phylloxera Board, may use a manual system that is not managed centrally. But, each system needs to be capable of reliably finding specific official records on demand within a timeframe appropriate to business needs. Locating a patient's medical records in a hospital emergency department would need to be done more quickly than locating the minutes of the last library staff meeting of a local government authority.

Some agencies devolve responsibility for the storage and location of official records to individual officers who may create their own record storage and location systems. This may work as effectively as a centralised system, provided that official records can be found on demand.

### **Benchmarks**

- The agency's official records include any official records held off site.
- The agency assigns responsibility for the location of official records.
- All official records of the agency have controls upon and records of their locations.
- The agency has tools in place, either manual or automated, to record and control the location of official records.

- The agency has processes in place to control the location of official records of other agencies that it receives.
- The agency determines which staff will have access to tools to search for official records locations.
- The agency has tools in place to enable it to locate each one of its official records by its unique identifier.

## **Outcome 6 – Records can be relied upon**

### **Policy**

*Agencies shall implement measures to ensure the reliability of their official records as evidence of their business.*

### **Explanation**

Since official records are the most commonly accessed resource to understand what was said, done or approved to be done, the official records themselves need to be reliable. Unreliable official records waste time and money attempting to validate the official records, and decisions based on them could embarrass the agency, lose it money, affect the rights of South Australians and may, ultimately, lead to the loss of life.

Official records may be unreliable because they may have been tampered with, they are not the most up to date version or information within them is not sufficiently clear.

However, official records can also be subject to changes and alterations as part of agency business activities. In such cases agencies are required to establish and support the authorised changes to their official records.

The nature of the business that is captured in the official record will also have a significant impact on the issue of reliability. All official records need to be reliable, but the blood transfusion records of the Royal Adelaide Hospital have the potential for greater harm if they are not reliable than does the appointment diary for the Chief Executive of a local government authority.

### **Benchmarks**

- The agency assigns authority to alter or correct its official records.
- The agency assigns responsibility for the reliability of its official records.
- The agency has procedures to identify and manage incidents where official records have been altered or updated without approval.
- Senior management authorises remedial actions identified to restore the reliability of official records following major incidents of unauthorised alterations to official records.
- The agency's risk management plan includes a section on and referral to the agency's records management policies, procedures and practices.
- The agency assigns authority to certify the reliability of its official records.
- Business and record systems of the agency include security measures to restrict access to records by staff without the required security clearance.

## **Outcome 7 – The management of official records is planned**

### **Policy**

*Records management shall be managed and planned in a strategic and corporate manner.*

### **Explanation**

Well-planned and focused management of an agency's official records encourages good practices, helps to ensure positive outcomes and rewards time and effort.

State Records requires agencies to implement records management planning processes. Agencies should plan records management to harmonise with broader strategic and corporate planning. State Records cannot dictate what needs to be included in each agency's records management plan at the business activity level, but the broad planning elements can be modified by agencies to suit their particular circumstances.

The following benchmarks stipulate records management planning across all levels of planning within an agency, and in some instances within broader portfolio planning. This reflects the current practice of devolution of responsibility to business unit level.

### **Benchmarks**

- The agency includes records management in its strategic planning processes.
- The agency includes records management in its business planning processes.
- The agency develops a corporate records management plan.
- The agency's corporate records management plan is authorised by senior management.
- The agency reviews its corporate records management plan on a programmed basis.
- The agency's corporate records management plan applies to all of its records and record formats.
- The agency identifies its vital records.
- The agency has and implements a disaster recovery plan for its official records.
- All official records of the agency are placed into structured recordkeeping systems.
- Records management functionality is a key selection criteria for new business systems.
- The agency assigns overall responsibility for the management of all of its official records.

## **Outcome 8 – Records management training is provided to staff**

### **Policy**

*All staff within agencies shall receive training concerning records management as outlined in the agency's corporate records management plan.*

## **Explanation**

Records management impacts upon the daily conduct of business by all staff in agencies, thus all staff need to be aware of records management issues, problems and solutions, especially with the increasing devolution of records management responsibilities to the staff actually creating official records. The advent of electronic business systems, and the increasing speed and ease with which these are being used in the conduct of business, also adds weight to the need for records management training.

Ideally, all staff within the agency would receive comprehensive training on all aspects of records management, but realistically this is an impossible goal. Therefore State Records requires all agency staff to receive records management training to an appropriate degree for their role and position, and involvement with records management activities. State Records requires that the agency include a training component as part of its corporate records management plan to ensure the quality of the training.

State Records suggests that agencies model the records management-training component on their staff training plans for other areas such as finance or human resources. A number of training courses and sources exist including those offered by State Records and through other units of the public sector. Tertiary level training and on-line education courses are available with State Records.

## **Benchmarks**

- The agency develops and implements a training component within the corporate records management plan that identifies the records management training levels required for the following staff within the agency:
  - senior managers
  - records management practitioners
  - all other staff
- All staff within the agency receive training, to the degree identified as necessary in the training component, on the use of the agency's policies, procedures and practices in:
  - records creation
  - records capture
  - records disposal
  - access to records and disclosure of information within the records
  - alteration to records
  - record version control
  - records security
  - the validation of records.
- All staff in the agency receive training, to the degree identified as necessary in the training component, on the relevant legislative or administrative instruments to create official records to document the business they transact.
- All staff in the agency receive training, to the level identified as necessary in the training component, in the use of the tools for searching for official records.

- All staff within the agency receive training, to the level identified as necessary in the training component, on the application of records management principles and practices to all of their official records.
- The agency assigns responsibility for designing, implementing and reviewing the records management training.

## **Outcome 9 – Records management reporting mechanisms are implemented**

### **Policy**

*Agencies shall implement reporting mechanisms and processes to keep senior management informed about records management.*

### **Explanation**

Senior management staff need to be aware of what is happening to official records because of the agency-wide effects of records management. Effective records management programs require support and understanding from the highest levels of authority in an agency, gained by keeping senior managers informed of the progress and operation of the agency's records management processes and practices.

To achieve these goals agencies are required to implement records management reporting mechanisms and processes. The information contained within the reports is an issue for agencies to decide on the basis of their internal lines of responsibility and the business of the agency. State Records has, however, determined that a number of areas need to be reported upon.

### **Benchmarks**

- Senior management requires and receives regular review reports on:
  - the creation of official records within the agency
  - the capture of official records within the agency
  - the disposal of official records of the agency
  - the provision of access to, and disclosure of information within, official records
  - the operation of the agency's official records location policies, procedures and practices
  - the application of the agency's records management plan
  - the scope of application of records management policies, procedures and practices.
- Senior management requires and receives reports on major instances of official records being altered without approval.
- Senior management requires and receives reports on upgrades to, and implementation of, new records management software.
- Senior management requires and receives reports on upgrades to, and implementation of, new record keeping systems.
- The agency develops benchmarks to measure the operational effectiveness of its records management policies, procedures, training and practices.

- Senior management requires and receives reports on the degree to which the agency's records management policies, procedures and practices have met their benchmarks.

## **Outcome 10 – Policies, procedures and practices exist for the management of official records**

### **Policy**

*All agencies shall develop and implement records management policies, procedures and practices.*

### **Explanation**

It is vital that records management is supported by authorised policies, procedures and practices to ensure that official records will be capable of supporting and defending the actions of the agency.

Policies, procedures and practices will ensure that all staff in the agency know the purpose of the records management program, their role and responsibilities, and which records need to be created and managed to support business activities.

The agency's records management policies, procedures and practices need to not only be developed and documented, but also implemented and reviewed. This will ensure that they remain current and are used as the agency intended when they were developed. Policies, procedures and practices that are not adhered to by agency staff will be ineffective for improving the quality of records management across the agency or for the ability of the agency to support and defend its business.

Certain elements, given in the below benchmarks, need to be included in the agency's records management policies, procedures and practices. An agency will also need to take into account its particular business, the records it creates and the responsibility structures in place.

Agencies should also refer to State Records' Across-Government standards and guidelines on particular aspects of records management when developing their own policies, procedures and practices.

### **Benchmarks**

- The agency develops records management policies, procedures and practices that address:
  - records creation
  - records capture
  - records disposal
  - access to records in the custody of the agency, in the custody of private storage providers and in the custody of State Records
  - the disclosure of information within the records
  - records location control
  - the alteration of records

- record version control
- records security
- the validation of records.
- The agency ensures that all of its official records, and record formats, are included in its records management policies, procedures and practices.
- The agency distributes its records management policies, procedures and practices to all of its staff.
- Senior management of the agency authorises the records management policies of the agency.
- The agency reviews its records management policies, procedures and practices on a programmed basis.

## **Outcome 11 – Records management resources are implemented**

### **Policy**

*Agencies shall implement sufficient numbers of skilled resources to develop, implement and maintain Adequate Records Management tools, systems and practices.*

### **Explanation**

In order to facilitate ‘adequacy’ status for records management in an organisation the agency’s sponsor (Director of the associated strategic and operational programs) needs to ensure that there are sufficient resources in place to incrementally improve recordkeeping tools, systems and practices.

### **Benchmarks**

- The agency has assessed its records management resourcing requirements according to legislative, risk and business requirements
- The agency develops records management roles with appropriate classifications commensurate with the desired outputs
- The agency only appoints suitably experienced and knowledgeable practitioners
- Responsibility for records management outputs is assigned to appropriate personnel according to classification
- Appropriate governance is established to support records management practitioners
- The agency monitors resourcing levels to ensure they continue to sustain incremental improvement in the agency’s strategic and operational records management programs.

### **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>.