

Department of Justice

# Public Records & Information Management Engagement (PRIME) Community of Practice

Queensland State Archives  
5 February 2025



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Government

# Acknowledgement of country

*I acknowledge the Aboriginal peoples and Torres Strait Islander peoples as the traditional custodians of Queensland.*

*I pay my respects to Elders past, present and emerging.*

# Agenda

Item	Presenter	Objective
Introduction to active recordkeeping management	Katrin Hurlimann-Graham	<ul style="list-style-type: none"><li>• Unchanged obligations under section 14 and 15 of PRA 2023</li><li>• Introduction to section 21 of PRA 2023</li></ul>
Active recordkeeping management of physical records	Elizabeth Radford	<ul style="list-style-type: none"><li>• Key threats to physical records and mitigation strategies</li><li>• Existing resources to help with assessment and mitigation process</li></ul>
Active recordkeeping management of digital records	Stefania Di Maria	<ul style="list-style-type: none"><li>• Introduction to risks to digital records and mitigation strategies</li><li>• Existing resources to help with assessment and mitigation processes</li></ul>
Lost or damaged records	Allison Drechshage and Elizabeth Radford	<ul style="list-style-type: none"><li>• Seek urgent advice on damaged records</li><li>• Damaged isn't lost</li></ul>
Delegations of authority for public access	Colleen Sippo	<ul style="list-style-type: none"><li>• Overview of delegations for public records access</li></ul>
Update on mandatory standards consultation	Sarah Probst	<ul style="list-style-type: none"><li>• An update on mandatory standards</li></ul>
Other business	Tara Singh	<ul style="list-style-type: none"><li>• Teams chat</li><li>• Feedback and requests for next topics</li></ul>

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# Introduction to active recordkeeping management

Katrin Hurlimann-Graham



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# Active management of public records

- Public authorities have obligations to make and keep public records (s14 of the PRA 2023) and must ensure the safe keeping and preservation of public records it controls (s15 of the PRA 2023)
- Records governance policy requirement 4 “*Public authorities must actively manage permanent, high-value and high-risk records and information as a priority*”
- RGP Implementation guideline and Recordkeeping maturity assessment tool
- [Risk and disaster management for records | For government | Queensland Government](#)



# What is section 21 (PRA 2023)?

## 21 Notifying archives about particular public records

A public authority must give notice to the archivist if the authority has custody of a public record—

(a) that is more than 25 years old; or

**(b) that the authority knows, or ought reasonably to know—**

**(i) is of permanent value, regardless of its age; and**

**(ii) is at risk of loss or damage.**

Examples for paragraph (b)(ii)—

- a hard copy public record held in a storage facility that periodically floods
- a digital public record held in an electronic system to be decommissioned

# What does section 21(b) mean for you?

- QSA's aim is to help public authorities manage their recordkeeping risks
- Obligation to notify the State Archivist where there is a risk of loss or damage to permanent records
- QSA's aim to enable public authorities to make the decision on whether a notification under s21(b) is required
- Notifications will allow QSA to provide advice and support to public authorities where it is most needed



# What happens once the State Archivist is notified?

## It depends...

It depends... for permanent records at risk of loss or damage, the State Archivist may, under s26 of the PRA2023:

- give directions about the custody or preservation of the public record
- give directions about keeping or maintaining systems for accessing the public record
- take a copy of the public record
- take custody of the public record.

QSA will work with public authorities on a case-by-case basis to find the best solution to preserve the permanent records.

The State Archivist may direct the transfer of permanent records at risk of loss or damage in some circumstances.

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# Active recordkeeping management of physical records

Liz Radford

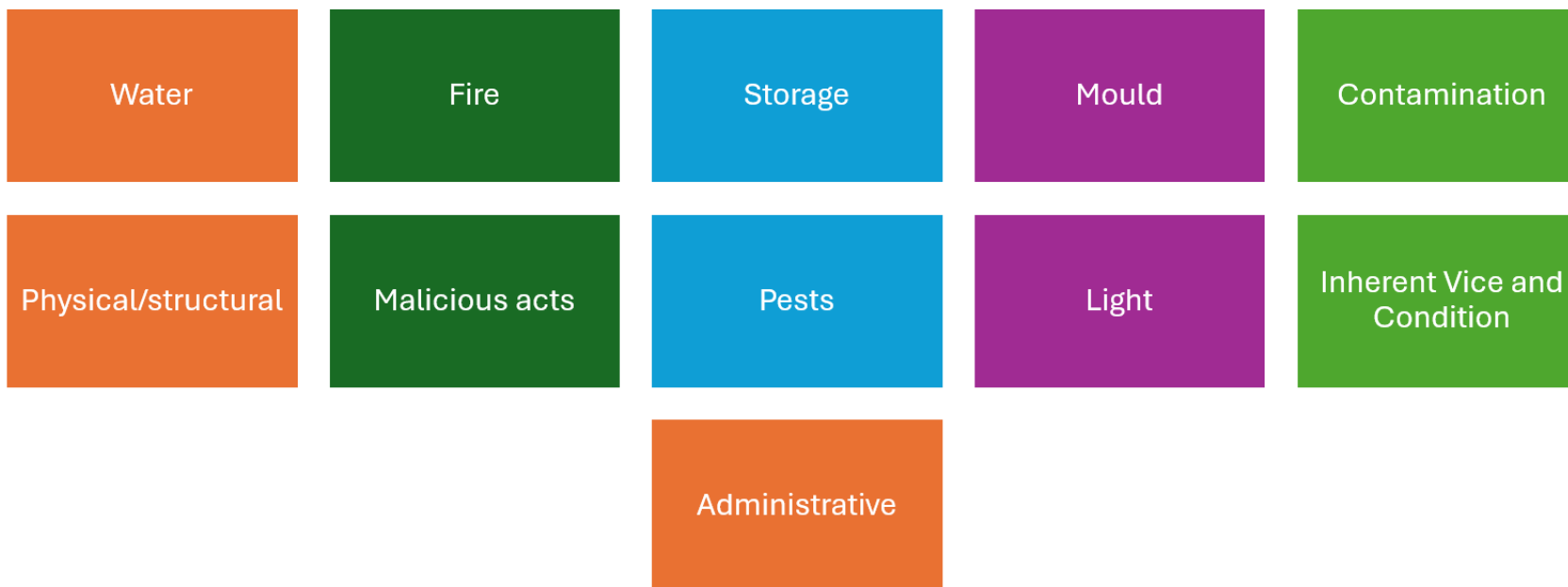


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# Looking after public records

- Maintain physical records | For government | Queensland Government
- Use the tool -  
[https://www.forgov.qld.gov.au/\\_\\_data/assets/excel\\_doc/0025/182284/Public-records-storage-conditions-assessment-tool.xlsx](https://www.forgov.qld.gov.au/__data/assets/excel_doc/0025/182284/Public-records-storage-conditions-assessment-tool.xlsx)

# Key threats to public records: Agents of Deterioration





# Shipping containers are not a good idea









# Basement storage and storing on the ground









# Outdoor storage



# Boxes etc provide protection





# Mitigating risks to public records

**Know** what records do you have? Where are they? Retention status, back-ups?

## **Assess**

Identify hazards – full records management continuum - make, capture, control, access, storage and disposal

Assign risk levels/ratings

- extreme or critical
- major or significant
- medium or moderate
- low or minor
- negligible or trivial

**Prioritise** highest level risks for **permanent** value records

**Develop** and **implement** control strategies

**Re-assess** with strategies now in place

**Notify** only where there is residual risk to permanent value records that cannot be further mitigated



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# Active recordkeeping management of digital records

Stefania Di Maria



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# Risks to records in the digital landscape

Digital Archive Team





# Key risks

Managing digital records requires identifying and mitigating key risks that could affect their:

- Accessibility
- Integrity
- Long-term usability.



# Key risk categories

The four key categories of risk are:

- Security Risks
- Risks of Technological Obsolescence
- Storage Risks
- Format Risks



# Mitigating the risks

- 
- Identify risks
  - Assess risks
  - Determine appropriate risk mitigation strategies

# Security risks



Loss of access (due to organisational change)



Cybersecurity breaches



Inadequate access control in systems



# Self-assessment questions

Are robust access control mechanisms implemented across all systems?

Is there a documented cybersecurity policy that includes incident response procedures specific to digital records?

How frequently are access permissions reviewed and updated?

Are encryption and access controls regularly updated and audited?

How are access permissions managed to prevent unauthorised access or accidental modifications?

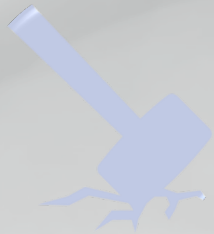
# Technological obsolescence



Decommissioning of systems  
without proper migration



Software/application  
upgrades or replacement



Discontinued or obsolete  
hardware and software

# Self-assessment questions

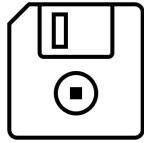
Is there a formal process for migrating records from decommissioned systems to new, supported systems?

Is there a protocol for verifying data integrity after software upgrades?

Are contingency plans in place for accessing records stored on obsolete hardware or software?

Are systems and hardware regularly reviewed to identify if they are nearing obsolescence?

# Storage risks



Legacy media Incompatibility



Metadata loss during migration



Media degradation/Discontinuation



Dependence on decommissioned systems



# Self-assessment questions

Are metadata preservation practices integrated into migration processes?

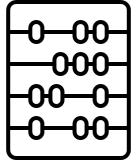
Is there a schedule for migrating data to new storage media to prevent loss?

Are there regular checks for readability and accessibility of stored media?

How often is electronic storage media inspected for physical degradation?

How is metadata integrity ensured during and after migration?

# Format risks



At-risk Formats



Organisational Change and  
Knowledge Loss



Data Degradation/Corruption



Format Conversion Errors

# Self-assessment questions

Are there quality assurance protocols for validating the accuracy and completeness of format conversions?

Is there documentation or training programs to preserve knowledge about managing specific file formats?

What measures are in place to detect and mitigate data degradation (e.g., bit rot)?

Are records encrypted, and if so, are there procedures in place to decrypt them?

How often are integrity checks conducted on digital records?

# Mitigating the risks – where to start...

## Identify risks

- policies, procedures, processes
- organisational changes
- the IT environment and its maturity
- legal and regulatory environment



## Mitigating the risks – where to start...

- Assess the identified risks
- If the identified risk cannot be mitigated and is jeopardising the integrity, authenticity or accessibility of your records please get in touch!

# Resources

- [QSA website](#) – Information about maintaining digital records
- William Saffady's *Managing Information Risks* (Rowman & Littlefield, 2020)
- [Records, information and data risks, State Records NSW](#)
- Standards Australia's [AS ISO 31000:2018 Risk management – Principles and guidelines](#)
- Standards Australia's [AS ISO 15489.1: 2017 Information and documentation – Records management, Part 1: Concepts and principles](#)
- Standards Australia's [SA/SNZ TR 18128:2015 Information and documentation – Risk assessment for records processes and systems](#)



# Thank you!

[digitalarchive@archives.qld.gov.au](mailto:digitalarchive@archives.qld.gov.au)



# Lost or damaged records

Allison Drechshage and Liz Radford





# Lost and damaged public records



Public records that are not actively managed are at risk of loss or damage.

## **Active records management is:**

- Proper storage conditions
- Regular storage inspections
- Proactive sentencing
- Active disposal program
- Location control and audit
- Identifying high-value and high-risk public records.

# Consequences: Lost or damaged public records

## Business Risks

- Unable to locate critical information
- Improperly managed public records can cause business inefficiencies, costing time and money
- Decisions may be delayed if public records are inaccessible to support business processes

## Community Risks

- Personal information may be inappropriately accessed
- Public records about individuals may become inaccessible
- Loss of public records may negatively reflect on the reputation of your public authority

## Legal Risks

- Loss of important information that may be needed for legal purposes
- Loss of public records may result in failure to meet legislative requirements
- Loss of public records may directly impact on understanding of evidence-based decisions

# What to do: Lost or damaged public records

**Contact QSA as soon as possible. We are here to help!**



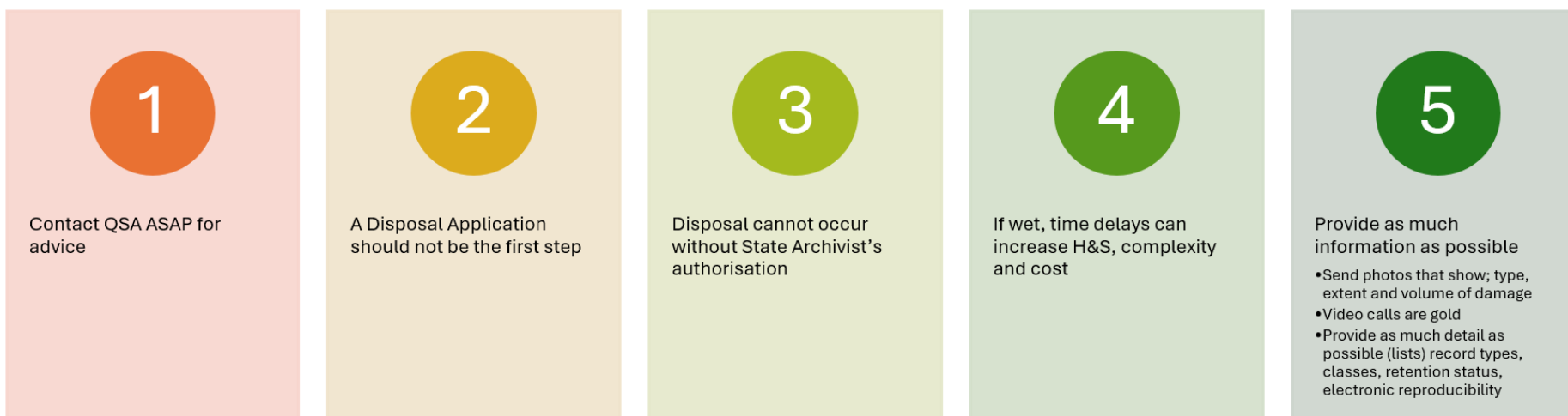
Applications may not be needed in all circumstances.

For damaged public records, salvage and remediation is time-critical.

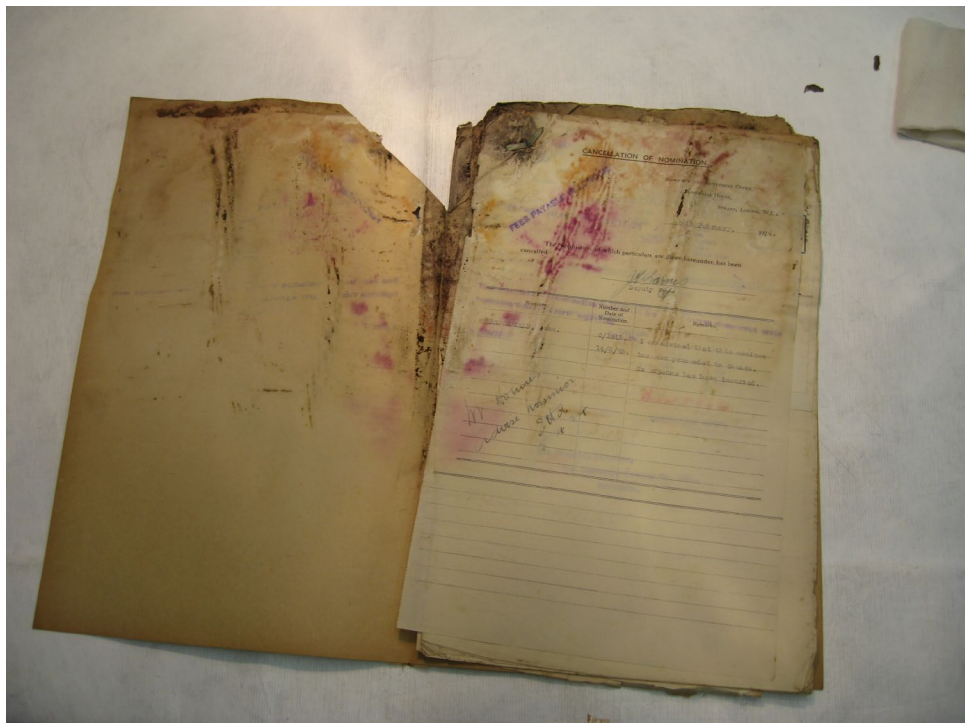
- Lost records: Are they lost forever? Or missing temporarily?
- Damaged records: All is not lost – it is remarkable what can be salvaged.

Lost and damaged records process applies to physical AND digital public records!

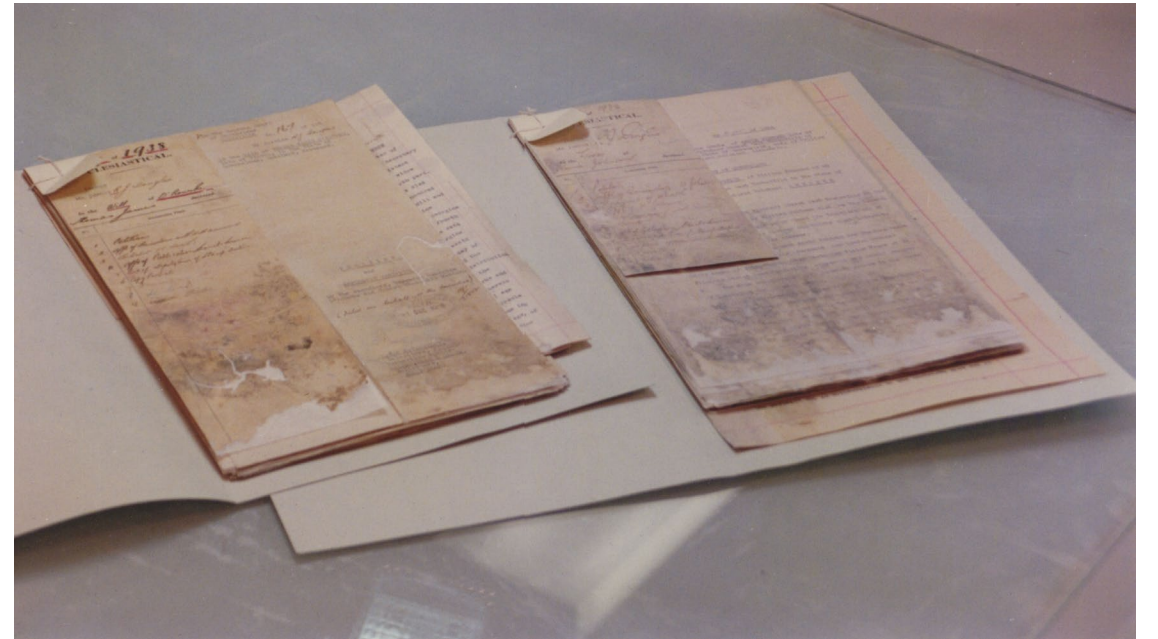
# When public records are damaged (or lost)

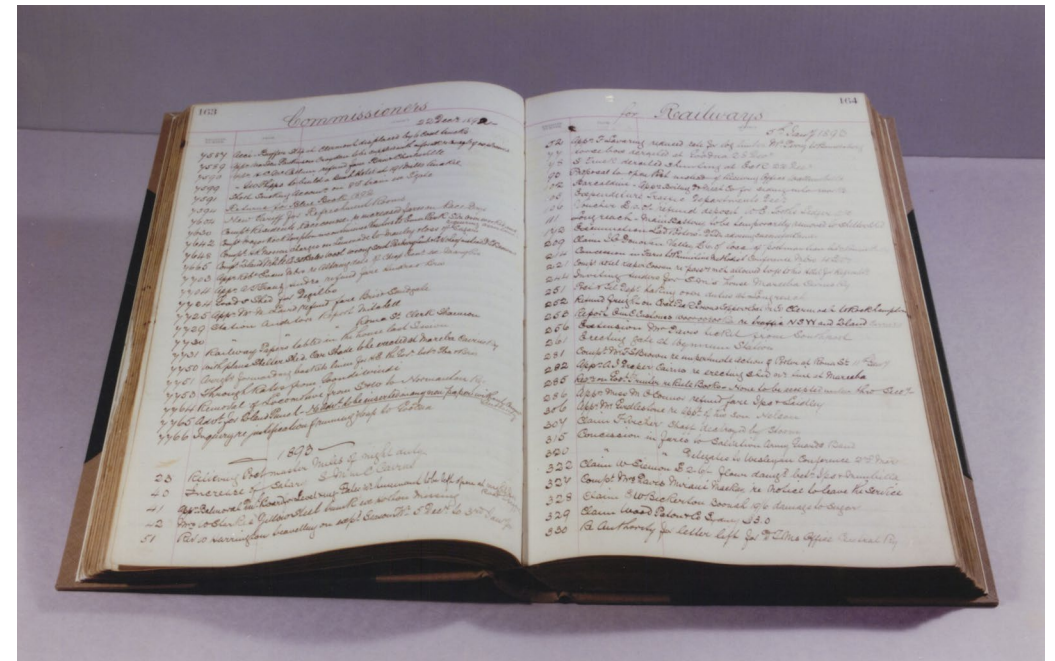
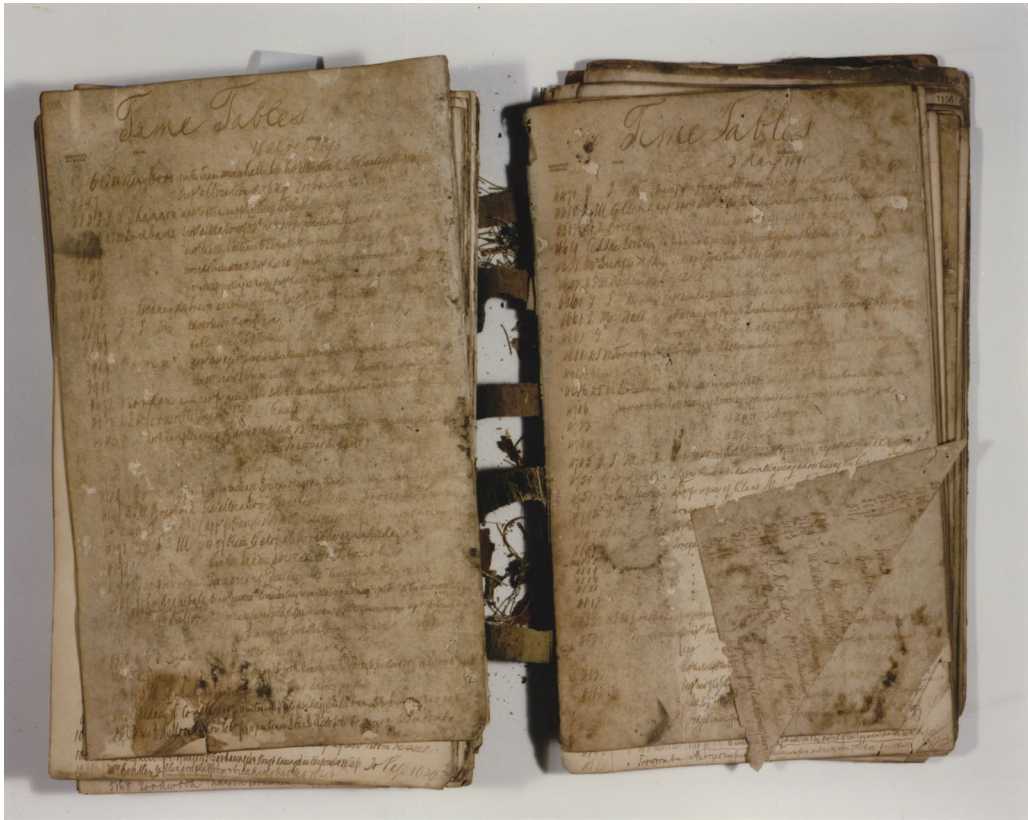


# Damaged public records can often be salvaged

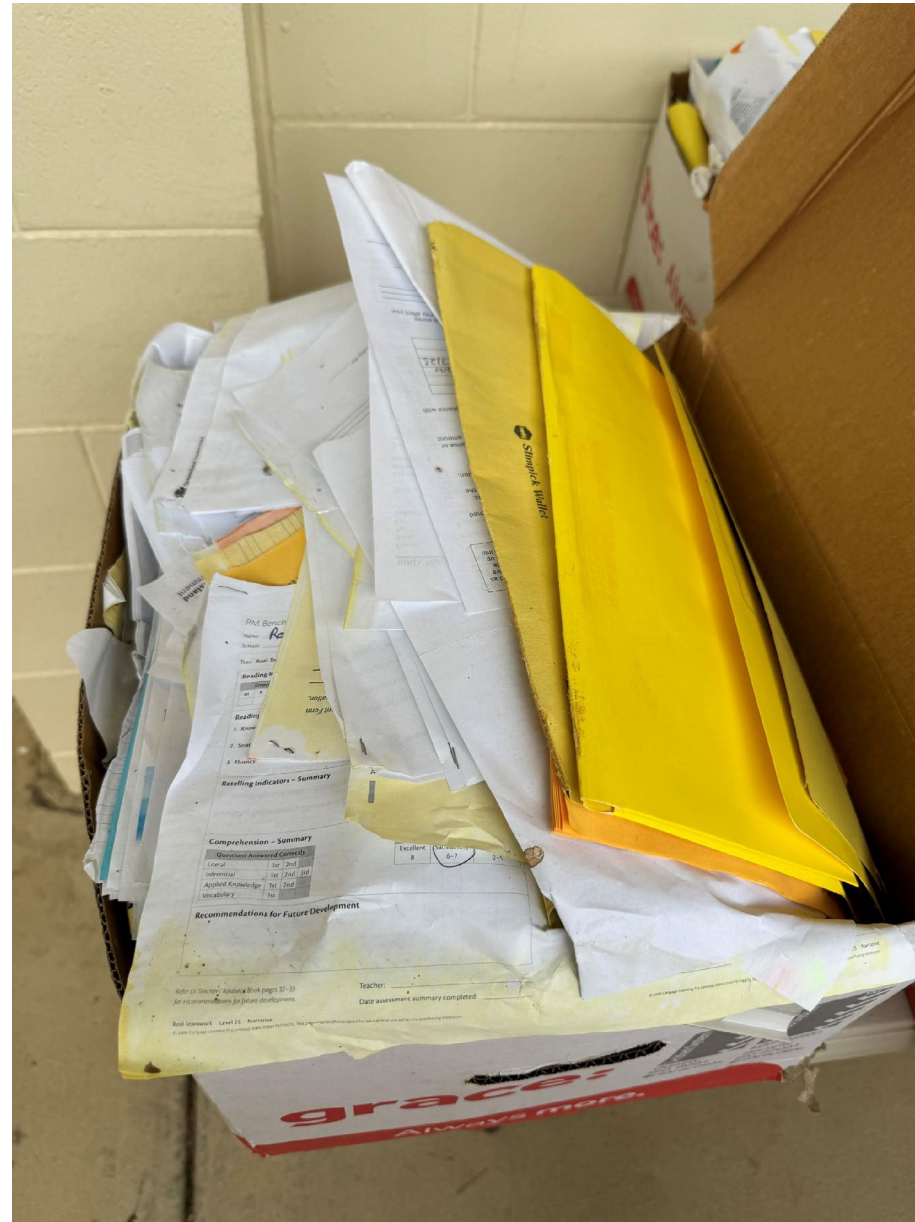


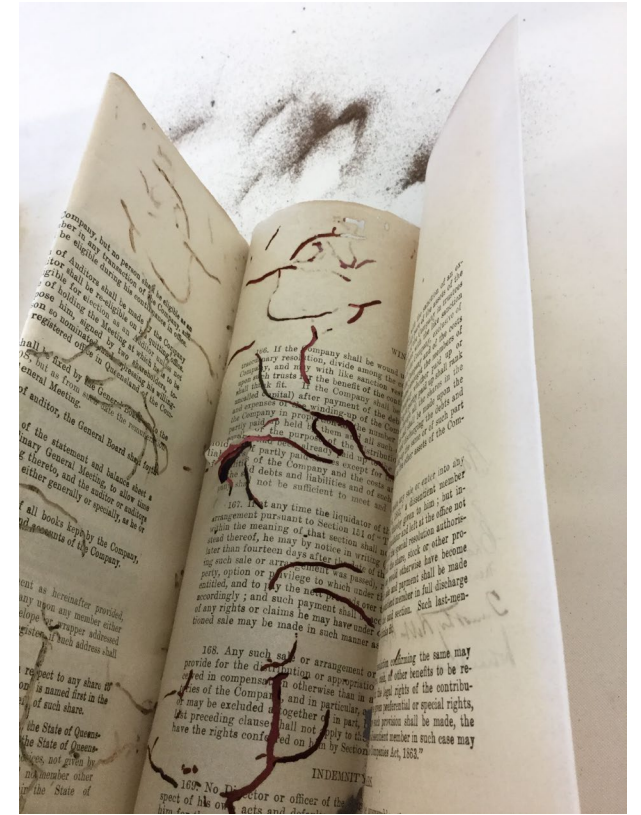




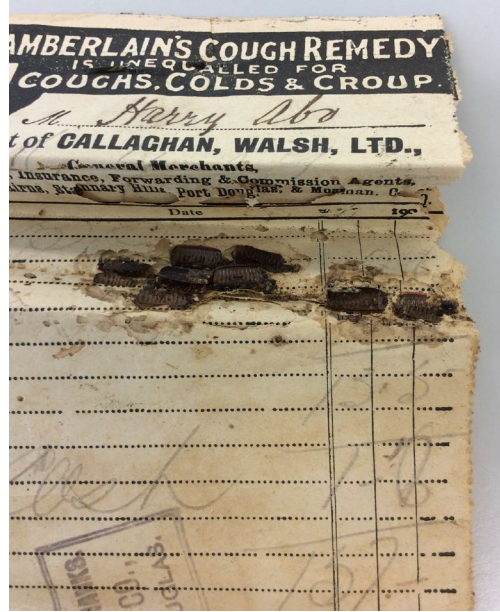




















# When is it too far gone?



# Application process: Lost or damaged public records



- Before applying, **contact QSA first** for advice
- Provide as much information as possible
- Provide photos of the affected public records
- Where possible, act to prevent further damage to the affected public records
- All applications are assessed and decision made by the State Archivist on whether to remediate or dispose of damaged public records
- The State Archivist will respond to the application in writing to the Chief Executive and provide advice and decision outcome.



# Final takeaway: Lost or damaged public records



**We are here to help!**

1. Contact QSA **as soon as possible** for advice and support
2. Damage to public records does not equal disposal
3. Seek advice first before making an application
4. The State Archivist may require remediation – or other salvage methods – for damaged public records in certain circumstances



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# Delegations of authority for public access

Colleen Sippo



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# What we'll cover today



- What are delegations of authority for public records access?
- New *Public Records Act 2023* references to delegations
- Delegate responsibilities
- What to consider when nominating delegates
- How to nominate delegates
- Support for delegates

# What are delegations of authority for public records access?

- The chief executive of your public authority has **responsibilities relating to access to public records** under the *Public Records Act 2023*
- These are:
  - **Provision of a restricted access notice** (ss28-32)
  - **Approving or refusing access to restricted records** (s38)
- They only apply to **records in QSA's custody**
- These powers **may be delegated** to an 'appropriately qualified' position or person



# Restricted Access Notices (RANs) - What do delegates have to do?

**Delegates for ss28–32 (provide a RAN) are required to:**

- determine whether their records in QSA's custody contain restricted information or are regulated records and;

- if so, state how long they should be unavailable to the public (restricted) under a restricted access period (RAP) in a restricted access notice (RAN) provided to QSA.

- Metadata associated with restricted records may be restricted from online publication if it contains restricted information.

## Restricted access notice form

Complete this form if you need to:

- confirm the open access status and metadata availability of records being transferred to Queensland State Archives (QSA) or in QSA's custody
- inform QSA that records being transferred to QSA or in QSA's custody are regulated and/or contain restricted information in accordance with the Public Records Act 2023, and
  - set the Restricted Access Period (RAP) for regulated records or records containing restricted information, and
  - inform QSA if the record metadata contains restricted information that cannot be published to QSA's public catalogue [ArchivesSearch](#).

This form:

- must be approved by the the chief executive or a delegate authorised to provide RANs for your public authority
- supersedes any previous Restricted Access Notices / Restricted Access Period Notices for the relevant records.

[Learn more](#) about records access, metadata availability and delegations of authority.

## Before you begin

Assess the relevant records against the Public Records Act 2023 using the [Practical Guide to Determining Public Records Access](#).

You need your:

- record identification details
- record access details
- metadata details
- approver details.

For help contact [discovery@archives.qld.gov.au](mailto:discovery@archives.qld.gov.au).

## After you submit

You will receive PDF copy of the form.

If you are the approver, please forward the form to [discovery@archives.qld.gov.au](mailto:discovery@archives.qld.gov.au) or the relevant QSA officer for finalisation.

If you are not the approver, you will need to send the form to your nominated approver to approve the notice. Once approved, the form should be forwarded to [discovery@archives.qld.gov.au](mailto:discovery@archives.qld.gov.au) or the relevant QSA officer for finalisation.

## Records identification

Which Record Type, Series ID and Title, Item IDs does this access notice apply to? \*

## Records access

Are the records regulated? \*

☐ Yes


☐ No

☐ No

# Requests to access restricted records - What do delegates have to do?

Delegates for s38 (approve access to restricted records) are required to:

- determine whether access should be granted to restricted records upon request within 35 business days of receipt
- provide a reason for any refusals or conditions imposed.

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**ACCESS TO RESTRICTED RECORDS NOTIFICATION**

I

Use this form to notify the Queensland State Archives (QSA) of your response to the application to access restricted record(s) made by the applicant identified below. Multiple record applications by the same person with the same access response can be listed on one form. If there are multiple record applications with different access responses, please use separate forms.

See [how to approve or refuse access to records](#) for more information or email QSA at [info@archives.qld.gov.au](mailto:info@archives.qld.gov.au) for assistance.

**Applicant information**

**Name:**  
Click here to enter applicant's name

**Email address:**  
Click here to insert applicant's email address.

**Chief Executive or Authorised Delegate information**

*This form is to be sent to QSA within 35 business days of receipt of the application (unless a longer period is agreed to by the Archivist prior to day 35) under s38(3) of the Public Records Act 2023.*

*By signing this form, I affirm that I am signing this in my capacity as CEO or an authorised delegate of the responsible public authority.*

**Name:**  
Click here to enter name of authorised officer.

**Position Title:**  
Click here to position title of authorised officer.

**Responsible Public Authority:**  
Click here to enter name of responsible public authority.

**Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_  
Click here to enter date authorised.

**Note:** This form can be signed digitally if your agency has appropriate processes in place to ensure the signature's authenticity. Digitally signed forms must be saved as PDF before submitting to QSA.

Section 38(2) of the *Public Records Act 2023* provides that as the responsible public authority, you may:

- Approve the application for access
- Approve the application for access with reasonable conditions
- Refuse the application for access.

Please indicate your response below.

*If the responsible public authority refuses access or imposes conditions on access, the authority must advise the Archivist about why it has done so under s38(4) of the Public Records Act 2023.*

Queensland State Archives – December 2024

1



# A delegate should be someone who has....



**Knowledge and understanding of the public authority's records and functions**



**Sufficient seniority to authorise the release of information**



**Capacity to respond to requests within mandated response times of 35 days under s38 (if applicable)**



**Awareness of relevant legal frameworks**



**Understanding of importance of records to First Nations peoples**

# Nominating delegates

Delegations of authority can be nominated by your chief executive using the [delegation of authority form](#) for the *Public Records Act 2023* which is available on our website, [Delegations of authority for public records access | For government | Queensland Government](#).



## PUBLIC RECORDS ACCESS DELEGATION OF AUTHORITY FORM

The chief executive of a responsible public authority under the *Public Records Act 2023* (the Act) may use this form to delegate their responsibilities under the Act to provide restricted access notices and/or approve access to your public authority's restricted records in the custody of Queensland State Archives (QSA).

### About delegations of authority for records access:

- **Delegates must be appropriately qualified.** The following attributes should be considered when determining qualification to execute the relevant powers under the *Public Records Act 2023*:
  - Knowledge and understanding of the public authority's records and functions, including the ability to assess records and determine their sensitivity, cultural significance, and potential impact on privacy
  - Sufficient seniority to [authorise the release of information](#)
  - Capacity to respond to requests within [mandated response times of 35 business days](#) under s38
  - Awareness of relevant legal frameworks, including any legislation governing the authority's functions, the *Public Records Act 2023*, the *Right to Information Act 2009*, the *Information Privacy Act 2009* and the *Human Rights Act 2019*
  - Understanding of importance of records to First Nations peoples and ability to receive advice from appropriate knowledge holders to make informed determinations regarding sensitivity of records relating to First Nations peoples and cultures.
- Delegations may be either to nominated individuals (by name) or to a nominated position (by position title)
- Authority may be delegated to a position or individual within or external to the relevant public authority. Use the 'Public authority or service provider (if different to responsible agency)' section to indicate if a position or individual is external to the relevant public authority.
- If no delegates are authorised, all public records access matters will require authorisation from the chief executive, in accordance with the Act.
- QSA may request that authorised delegates for records access provide nominations for other roles relating to the public authority's records at QSA, such as [ArchivesGateway](#), Security Administrators and Senior Agency Administrators.

Find out more about [delegating authorisations](#), [restricted access notices](#), and [providing access to restricted records](#) on our website.

### Completing this form:

- Complete the delegate information for each authorised delegate. Use the 'add another delegate' option to add additional delegates.
- All fields are mandatory unless otherwise specified.
- Return the completed and signed form in PDF format to QSA at [discovery@archives.qld.gov.au](mailto:discovery@archives.qld.gov.au)

## PUBLIC RECORDS ACCESS DELEGATION OF AUTHORITY FORM

### Delegate information – Delegate 1.

#### 1. Delegate details

Nominate the authorised officer position or individual below:

**Position title (preferred) or name of individual:**

[Click here to enter the position title being nominated.](#)

**Public authority or service provider (if different to responsible agency):**

[Click here to enter the agency name.](#)

**Email:**

[Click here to enter email address.](#)

**Phone:**

[Click here to enter phone number.](#)

**Note:** If nominating an individual, the email address must include the individual's name, e.g. [Jane.Smith@...; jblogs@...; JaneD@...](#)

#### 2. Scope of authorisation

In addition to the chief executive, the officer detailed above is authorised to:

☐ Yes ☐ No

**Provide restricted access notices** and associated restriction details under ss.28-32 and schedule 2 of the *Public Records Act 2023*.

Under s28 of the *Public Records Act 2023*, records in QSA's custody are open to the public unless they are regulated or contain restricted information. If records are regulated or contain restricted information, public access to records may be restricted for a [period of time](#) known as a RAP.

During the RAP, access can be granted by the chief executive or authorised delegate or an application for access can be made under the *Information Privacy Act 2009* or the *Right to Information Act 2009*.

☐ Yes ☐ No

**Approve access to restricted records** under s.38 of the *Public Records Act 2023*

If the RAP for a public record in the custody of QSA has not ended, access may be granted by the chief executive or nominated delegate of the responsible public authority.

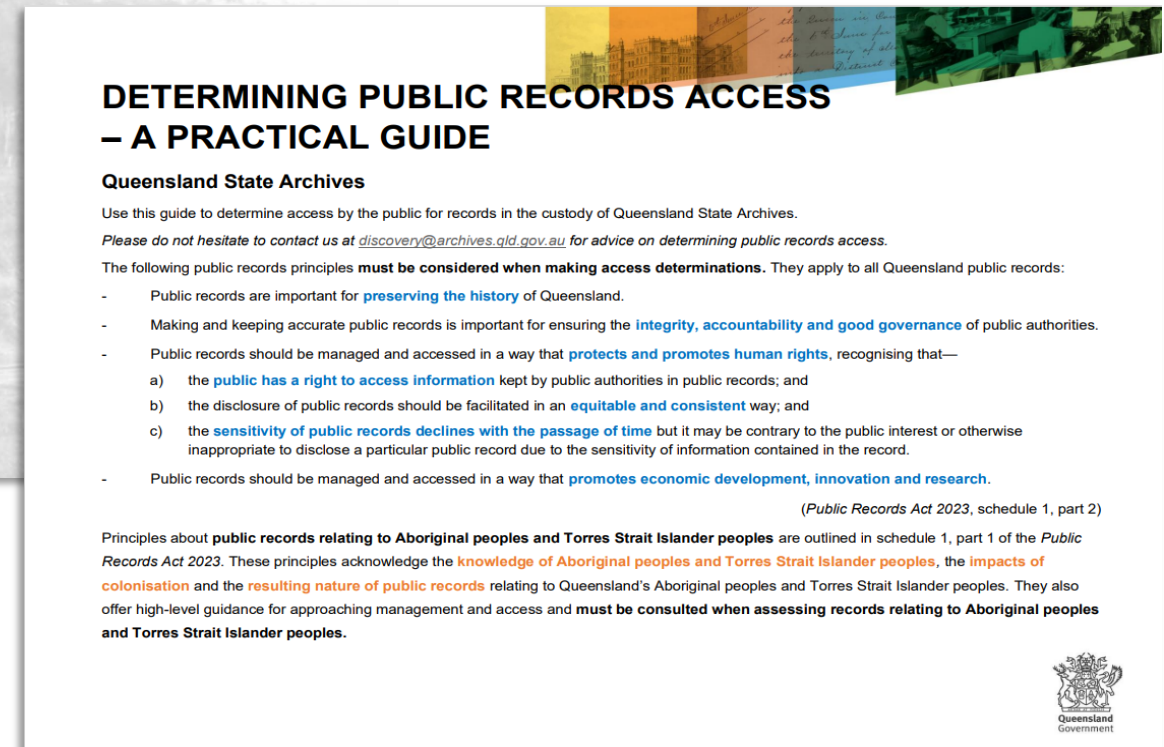
Under s38, [requests must be responded to within 35 business days](#) of receipt by the responsible public authority. If access is refused or conditions are imposed, QSA must be advised of the reason.

\*To add another delegate, click in the above section, then click the [\(+\)](#) at the end of the above section as required.

# Support for delegates



Available from: [Practical-Guide-to-Determining-Public-Records-Access](#)



# Summary of key points

All delegations of authority under the *Public Records Act 2002* ceased on 5 December 2024 with the commencement of the *Public Records Act 2023*

These include delegations of authority for public records access – provision of RANs and making determinations regarding requests to restricted records

Until new delegations are received, your chief executive remains solely responsible for public records access for records in QSA's collection

To authorise new delegations, use the updated PRA 2023 delegation form, available on the ForGov website



# Some final things...

1

When completing any forms detailed in today's presentation, ensure they are current 2023 Public Records Act versions

2

If your public authority hasn't yet returned their new delegation form, arrange for this to be considered by your chief executive as soon as possible (especially if you have closed records at QSA)

3

If you're unsure whether new delegations have been nominated or not, or you need some advice or assistance, please contact us at [discovery@archives.qld.gov.au](mailto:discovery@archives.qld.gov.au) – we're here to help!

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# Update on mandatory standards consultation

Sarah Probst



Queensland  
Government

# 5 key findings from consultation

## 1. Stakeholders want standards to:

- help others **understand** recordkeeping requirements
- provide **clear requirements**
- deal with records **across systems**
- garner **support from senior leaders**

## 2. Stakeholders evenly supported the approach used by:

- **Public Records Office of Victoria** based on principles with requirements which are concise, simple and high level – provides flexibility and less clarity
- **State Records NSW** based on principles which clearly identify specific minimum compliance requirements – provides clarity and less flexibility

# 5 key findings from consultation

3. Although **supported**, there was **some confusion** about what an outcomes-based approach to mandatory standards is, noting this was QSA's first round of consultation about this approach. For instance, there was some concern the approach may be too flexible and not provide clarity about minimum requirements

4. Strong need for standards to deal with **minimum metadata requirements**

5. Explore including:

- mandatory records management **training** within public authorities
- **assigning roles and responsibilities** including senior leadership
- a standard on **operational management** (like PROV) and/or **functional requirements**



# Consultation on mandatory standards

## Engagement

Over the five consultation sessions in Nov/Dec 2024:

- **219** attendees across 5 interactive sessions
- Attendees from **132** different public authorities
- Attendees from **14** different sectors of government
- Significant attendees from **Local Government, Qld Gov Departments, the Health Sector and Justice, Legal and Integrity authorities**
- Overwhelmingly positive feedback on consultation sessions and the use of interactive AHA to obtain immediate feedback from stakeholders for data analysis

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# Other business

Tara Singh



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# Thank you!



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