Comparison table of changes made to consultation draft requirements

Purpose

This resource supports public authorities to understand the changes made between the Round 3 Consultation Draft and the finalised requirements in the *Records Management Policy – Make and Keep* and *Records Management Policy – Disposal.*

Records Management Policy – Make and Keep

Draft 2 Round 3 - Chief Executive Survey	Change/s	Reasoning	Finalised requirement
MK1 **Records management is supported at all levels of the business with appropriate governance frameworks.**	**Nil**	**N/A**	**MK1** **Records management is supported at all levels of the business with appropriate governance frameworks.**
MK1.1 The strategic direction and allocation of resources for records management is determined and documented by senior management and/or an internal governance mechanism.	**Nil**	**N/A**	MK1.1 The strategic direction and allocation of resources for records management is determined and documented by senior management and/or an internal governance mechanism.
MK1.2 Corporate responsibility for oversight of records management is assigned to a designated individual/s (senior responsible officer/s). Responsibility includes records management across all operating environments.	**Nil**	**N/A**	MK1.2 Corporate responsibility for oversight of records management is assigned to a designated individual/s (senior responsible officer/s). Responsibility includes records management across all operating environments.
MK1.3 Staff, contractors and volunteers are, during induction and periodically throughout their tenure, trained and supported to make and manage records.	1. Replaced “staff” with “employees” 2. Reworded slightly – removed “are …, trained”. Now “, complete training” 3. Add “must” and “be”	1. Provides clarity and reduces ambiguity by identifying the groups covered by the requirement. 2. This wording was updated to emphasise that training must be completed. 3. Updated wording for readability.	MK1.3 Employees, contractors and volunteers complete training during their induction and periodically throughout their tenure, and are supported to make and manage records.
MK1.4 Governance mechanisms are in place to oversee compliance.	**Nil**	**N/A**	MK1.4 Governance mechanisms are in place to oversee compliance.
MK1.5 Records management responsibilities are identified and included (or defined) in all outsourced, cloud, contracted and similar service arrangements.	**Nil**	**N/A**	MK1.5 Records management responsibilities are identified and included (or defined) in all outsourced, cloud, contracted and similar service arrangements.
MK2 **Make accurate public records of actions and decisions.**	**Nil**	**N/A**	**MK2** **Make accurate public records of actions and decisions**.

Draft 2 Round 3 - Chief Executive Survey	Change/s	Reasoning	Finalised requirement
MK2.1 Actions and decisions are consistently and routinely recorded.	**Nil**	**N/A**	MK2.1 Actions and decisions are consistently and routinely recorded.
MK2.2 A decision about a public record and records management is defensible and can be traced back to responsible parties or decision makers.	**Nil**	**N/A**	MK2.2 A decision about a public record and records management is defensible and can be traced back to responsible parties or decision makers.
MK2.3 A decision about a public record and records management appraises value and considers risk.	**Nil**	**N/A**	MK2.3 A decision about a public record and records management appraises value and considers risk. *Note: This links to section in the introduction about permanent value and temporary value record*s. *i.e. risk tolerance for permanent value records is low.*
MK2.4 A public record is made and kept digitally by default throughout the lifecycle of the record, whenever practicable.	**Nil**	**N/A**	MK2.4 A public record is made and kept digitally by default throughout the lifecycle of the record, whenever practicable.
MK3 **Make accurate metadata about a public record.**	**Nil**	**N/A**	**MK3** **Make accurate metadata about a public record.**
MK3.1 Metadata is made and captured to ensure authenticity, meaning and context are associated with the public record.	**Nil**	**N/A**	MK3.1 Metadata is made and captured to ensure authenticity, meaning and context are associated with the public record.
MK3.2 Public records are identifiable, retrievable and accessible for as long as they are required.	**Nil**	**N/A**	MK3.2 Public records are identifiable, retrievable and accessible for as long as they are required.
MK3.3 Where relevant, metadata is made and captured by Departments for records relating to Aboriginal and Torres Strait Islander communities, culture, culturally sensitive information and languages.	1. Replaced “where relevant” with “whenever practicable”.	1. The change from “where relevant” to “whenever practicable” clarifies that the requirement is expected to be met wherever it is feasible to do so, while allowing public authorities to consider their specific circumstances when implementation is genuinely impracticable. Queensland State Archives intends to adopt the approach taken by the Office of the Information	MK3.3 Whenever practicable, metadata is made and captured for records relating to Aboriginal and Torres Strait Islander cultural heritage[2], communities, cultures, culturally sensitive information and languages.

[2] As defined under *Torres Strait Islander Cultural Heritage Act 2003* and *Aboriginal Cultural Heritage Act 2003*.

Draft 2 Round 3 - Chief Executive Survey	Change/s	Reasoning	Finalised requirement
		Commissioner Queensland[1] regarding what is practicable. The Macquarie Dictionary defines "practicable" as "capable of being done" especially with the available means or with reason or prudence i.e. it is feasible to be done. Whether something is practicable or not will be determined having regard to all the circumstances.	
	2. Removed "by Departments"	2. Applying this requirement to all public authorities recognises that records relating to First Nations peoples are made and managed by more public authorities than Departments and reflects existing requirements under other existing legislation.	
	3. Replaced "culture" with "cultures"	3. The term "culture" was changed to "cultures" following feedback to recognise the diversity of Aboriginal cultures and Torres Strait Islander cultures.	
	4. Added "cultural heritage" as defined under the *Torres Strait Islander Cultural Heritage Act 2003* and *Aboriginal Cultural Heritage Act 2003*.	4. The requirement was expanded to include Aboriginal cultural heritage and Torres Strait Islander cultural heritage following feedback.	
MK4 **Keep a public record.**	**Nil**	**N/A**	**MK4** **Keep a public record.**
MK4.1 A public record is consistently and routinely kept in appropriate storage conditions.	**Nil**	**N/A**	MK4.1 A public record is consistently and routinely kept in appropriate storage conditions.
MK4.2 Storage arrangements protect public records from misuse, loss, deterioration or damage.	**Nil**	**N/A**	MK4.2 Storage arrangements protect public records from misuse, loss, deterioration or damage.
MK4.3 Security and preservation activities protect public records from inappropriate access and changes.	**Nil**	**N/A**	MK4.3 Security and preservation activities protect public records from inappropriate access and changes.
MK4.4 Public records are accessible until disposal is appropriately endorsed and authorised.	**Nil**	**N/A**	MK4.4 Public records are accessible until disposal is appropriately endorsed and authorised.

[1] Office of the Information Commission Queensland, Practicable and impracticable Key privacy concepts | OIC

Draft 2 Round 3 - Chief Executive Survey	Change/s	Reasoning	Finalised requirement
MK4.5 A public record in a digital system can be migrated or exported accurately and completely.	**Nil**	**N/A**	MK4.5 A public record in a digital system can be migrated or exported accurately and completely.

Records Management Policy – Disposal

Draft 2 Round 3 Chief Executive Survey	Changes	Reasoning	Finalised requirement
D1 **Disposal is underpinned by appraisal.**	**Nil**	**N/A**	**D1** **Disposal is underpinned by appraisal.**
D1.1 Public records are assessed to identify value of these records to the community, to the public authority that makes and keeps these records and, to the government of Queensland.	**Nil**	**N/A**	D1.1 Public records are assessed to identify value of these records to the community, to the public authority that makes and keeps these records and, to the government of Queensland.
D1.2 Public records are assessed to identify risk to records in relation to unlawful disposal, loss or damage, unauthorised use or over retention.	**Nil**	**N/A**	D1.2 Public records are assessed to identify risk to records in relation to unlawful disposal, loss or damage, unauthorised use or over retention.
D1.3 Public records are assessed to determine if any changes in value, circumstances or risk have occurred, and a decision is made and documented to demonstrate whether disposal should occur.	**Nil**	**N/A**	D1.3 Public records are assessed to determine if any changes in value, circumstances or risk have occurred, and a decision is made and documented to demonstrate whether disposal should occur.
D2 **Public records are retained for as long as they are required**.	**Nil**	**N/A**	**D2** **Public records are retained for as long as they are required.**
D2.1 Disposal of public records is undertaken in accordance with section 23 of the *Public Records Act 2023*	1. Replaced “in accordance with” to “in a manner consistent with”. 2. Included “section 22”.	1. Clarified the relationship between the requirement and relevant legislative obligation. 2. A reference to section 22 was included to better reflect the relevant statutory framework and intended records management outcome.	D2.1 Disposal of public records is undertaken in a manner consistent with sections 22 and 23 of the *Public Records Act 2023*.

Draft 2 Round 3 Chief Executive Survey	Changes	Reasoning	Finalised requirement
D2.2 All staff, contractors and volunteers, are aware of their obligations regarding the retention of public records for as long as they are required to meet business, legislative, accountability and community purposes.	1. Replaced “staff” with “employees”.	1. Provides clarity and reduces ambiguity by identifying the groups covered by the requirement.	D2.2 All employees, contractors and volunteers, are aware of their obligations regarding the retention of public records for as long as they are required to meet business, legislative, accountability and community purposes.
D2.3 When a permanent value record is converted into a different format or migrated to a different system, the source record can only be disposed of in accordance with an applicable disposal authorisation.	**Nil**	**N/A**	D2.3 When a permanent value record is converted into a different format or migrated to a different system, the source record can only be disposed of in accordance with an applicable disposal authorisation.
D3 **Disposal is managed and documented.**	**Nil**	**N/A**	**D3** **Disposal is managed and documented.**
D3.1 Disposal of public records is documented and includes information about appraisal justifications for the disposal action.	**Nil**	**N/A**	D3.1 Disposal of public records is documented and includes information about appraisal justifications for the disposal action.
D3.2 When systems are decommissioned, appraisal of public records within the decommissioned system is considered and documented.	**Nil**	**N/A**	D3.2 When systems are decommissioned, appraisal of public records within the decommissioned system is considered and documented.
D3.3 Disposal actions for public records are authorised by the Chief Executive of the public authority, or their authorised delegate and the decision is documented.	**Nil**	**N/A**	D3.3 Disposal actions for public records are authorised by the Chief Executive of the public authority, or their authorised delegate and the decision is documented.
D3.4 Disposal requirements are identified and included (or defined) in all outsourced, cloud, contracted and similar service arrangements.	**Nil**	**N/A**	D3.4 Disposal requirements are identified and included (or defined) in all outsourced, cloud, contracted and similar service arrangements.
D3.5 Risk is assessed and reported internally via governance mechanisms, where any public record has exceeded its minimum retention period by five years.	**Nil**	**N/A**	D3.5 Risk is assessed and reported internally via governance mechanisms, where any public record has exceeded its minimum retention period by five years.

Draft 2 Round 3 Chief Executive Survey	Changes	Reasoning	Finalised requirement
D4 **Disposal is complete and secure.**	**Nil**	**N/A**	**D4** **Disposal is complete and secure.**
D4.1 Methods for destruction of public records are secure and appropriate to the format/medium. As far as practicable, methods of destruction are irreversible.	**Nil**	**N/A**	D4.1 Methods for destruction of public records are secure and appropriate to the format/medium. As far as practicable, methods of destruction are irreversible.
D4.2 Complete disposal of a public record includes disposal of any copies of that record whenever practicable. Disposal of copies is undertaken in accordance with the appropriate disposal authorisation.	**Nil**	**N/A**	D4.2 Complete disposal of a public record includes disposal of any copies of that record whenever practicable. Disposal of copies is undertaken in accordance with the appropriate disposal authorisation.
D4.3 Disposal of public records does not compromise information security or information privacy.	**Nil**	**N/A**	D4.3 Disposal of public records does not compromise information security or information privacy.