

Review of the general retention and disposal authority for source records that have been migrated (GA33)

State Archives and Records NSW is undertaking a review of the [general retention and disposal authority for source records that have been migrated](#) (approved 2008). This authority provides for the authorised disposal of records which have been used as the input or source records for successful business or recordkeeping system migration operations. The authority establishes a number of conditions that must be met for the destruction of the source records to proceed. This includes a requirement for the source records to be kept for a period of no less than six months after the success of the migration has been confirmed. Agencies have indicated that, for projects where the migration process has been relatively straightforward, the mandatory minimum six month retention requirement after confirmation that the migration has been successful is an unnecessary period of time.

As part of the review process we are therefore considering removing the six month minimum retention period as a specific condition for destruction of the source records. The authority will still require the source records to be retained for a sufficient length of time after the migration to enable confirmation that the migration has been successful. Public offices will be responsible for determining an appropriate retention period, on a case by case or project by project basis, based on an assessment of risks associated with the business purposes of the records, size and complexity of the migration process, etc. This is similar to the approach adopted in the general retention and disposal authority for original or source records that have been copied and is also consistent with the approach of other jurisdictions. Our current guidance and advice on effective migration and decommissioning systems will be revised in conjunction with the authority's review to assist organisations to comply with the authority.

We would appreciate comments on the draft authority and/or any useful insights or experiences of public offices on the management of migration projects that could be used as examples to support the development of updated guidance.

The deadline for providing comments on the draft authority is Thursday 25 January 2018.

Any comments or questions regarding the review may be directed to:

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State Archives
& Records

**General retention and disposal authority:
source records that have been migrated**

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1 Overview

1.1 Purpose of the authority

This retention and disposal authority describes the circumstances and conditions under which the destruction of the original source records which have been used as the input or source records for successful migration operations is permitted under the provisions of the *State Records Act 1998*.

This authority is required because the process of migrating records yields two versions of the same record. The original record, known as the source record, continues to exist after a new version of it has been created by the migration process. In the majority of circumstances, there is no business need to retain both the source record and the new migrated version of the record.

Migration can be a complex process. When dealing with records that have long term retention requirements, it is particularly important to ensure the migrated records can be relied on and used in place of the source records for business, legal and accountability purposes for as long as they are required to be retained. The migration process needs to be appropriately performed and comprehensively checked before the records created during the migration can be regarded as authentic copies of the original source records and before the source records can then be destroyed.

This authority therefore establishes conditions that must be met before public offices are authorised to destroy source records that have been successfully migrated.

1.2 Scope of records covered by this authority

This retention and disposal authority applies to all source records that remain following the successful migration of records, irrespective of their date of creation. It applies to source records that have been migrated from all forms of business systems, not just those migrated from dedicated records management systems. It applies only to source records where it is the intention that the new migrated copy of the source record will be kept as the official record of business.

This authority authorises the destruction of the source records that remain following numerous different migration scenarios. These are:

<i>Migration from:</i>	<i>For example, in response to:</i>
one organisational business system to another	- changing business needs that lead to the adoption or procurement of a new business system or external service provider - technological changes that require the update of business systems or procurement of new services - the need to transfer records from active business systems to long term storage systems or from one external service provider to another

	other internal and external drivers
one organisation to another	- administrative change that requires the transfer of functions or activities from one organisation to another - the adoption of shared service arrangements that require the transfer of records from one organisation to another - other internal and external drivers
one organisation to State Records	- requirements for the management of State archives, where State Records is required to take control and custody of State archives - other business drivers

Note that this authority does not authorise the disposal of records that have been transferred from hard copy, or paper, into a digital format. The disposal of paper records that have been scanned or digitised is covered by the [General retention and disposal authority: original or source records that have been copied](#).

1.3 Destruction of source records that have been migrated

Source records that have been migrated may be destroyed provided the following conditions have been met:

1. The migration is planned, documented and managed
2. Pre and post migration testing proves that authentic, complete, accessible and useable records can and have been migrated
3. Source records are kept for an appropriate length of time after the migration to enable confirmation that the migration has been successful. Determination of the specific retention period must be based on an organisational risk assessment.
4. The disposal of source records is appropriately documented.

For further information on these conditions see the Guidelines for use.

The Guidelines must be read before applying this authority.

1.4 Records excluded from this authority

The following specific source record types are not covered by this authority:

- computer back-up tapes. Disposal of back up tapes is not covered by this authority. Established routines for the destruction or overwriting of backups should be documented in disaster management or continuity planning policies and procedures.
- transcribed records. The source records relied on for the transcription of the information content of a record into a more accessible format e.g. audio recordings, short hand notes, etc., do not fall within the scope of this

authority. Depending on the nature of the transcription process and, where this is supported by documented procedures and quality control processes, disposal of the source records for transcribed records may be permitted under the normal administrative practice provisions of the State Records Act.

- Audio visual analogue records being migrated to digital formats. This authority is not intended to be used as a means to destroy original analogue formats such as analogue film or audio visual formats that have been copied or converted to digital formats. Please contact State Archives and Records for advice about the management and retention of analogue audio visual format source records.
- paper source records where their informational content has been transferred to a digital format, e.g. paper records that have been scanned or digitised or where data or information originally maintained in paper format such as an index card or data entry form is transferred to a database format.

1.5 Implementing this authority

For further information and guidance about complying with the conditions for destruction outlined in this authority see *Guidelines for use*.

See also State Archives and Records NSW guidance [Decommissioning systems: records and information management considerations](#) and [Effectively manage the migration of your digital records](#).

For source records that have been imaged or scanned to create a digital copy the [General retention and disposal authority: original or source records that have been copied](#) should be applied.

2 Guidelines for use

2.1 Conditions for the destruction of records

Because of its capacity to significantly alter record content and structure, migration actions need to be well planned and effectively implemented in order for them to produce accurate versions of the source records that can be regarded, for both business and legal purposes, as true copies of the original.

To minimise the risks associated with migration processes this authority outlines four conditions that must be met before source records can be destroyed. Implementing these conditions will help public offices to perform migration operations that produce accurate and authentic records. The conditions also seek to ensure that the migrated records are appropriately managed and that the migration process is adequately documented.

To be able to destroy source records, a public office must ensure that the conditions for destruction described in this Authority are met. These conditions are that:

1.	The migration is planned, documented and managed
2.	Pre and post migration testing proves that authentic, complete, accessible and useable records can and have been migrated
3.	Source records are kept for an appropriate length of time after the migration to enable confirmation that the migration has been successful. Determination of the specific retention period must be based on an organisational risk assessment.
4.	The disposal of source records is appropriately documented.

1. The migration is planned, documented and managed

<i>Minimum requirements:</i>	<i>This means that:</i>
The migration is planned	• all records requiring migration are identified • all records are complete, with accurate and appropriate metadata • where appropriate and where there is no longer a business need for them, records due for destruction are destroyed rather than migrated • the hardware, software and format requirements of the records requiring migration

	are understood - the essential characteristics of the records requiring migration are identified and can be replicated by the chosen migration strategy ¹ - metadata mapping between the original system and the target system is performed to ensure that all necessary metadata elements, their corresponding functionality and relevant business rules can be migrated between systems - for internal migrations and migrations to organisations other than State Archives and Records, the full functionality of the target system is identified and understood and the target system is configured appropriately to meet recordkeeping requirements - the desired target state of the records post migration is identified - a migration method that will convert the records, including all metadata and essential characteristics, from their current state to the target state is developed
The migration is comprehensive	- all records requiring migration are migrated, including those that are stored online, near line, offline, in non active systems or secondary storage environments - the entire record, including all necessary metadata, is migrated - all essential characteristics have been preserved
The migration is documented	The entire migration process and associated project planning should be documented. This could include: - relevant research - all decisions, including decisions not to migrate certain metadata components of a record ² - risk assessments - the identified essential characteristics - the technical requirements of the original and target systems

¹ Essential characteristics are the key characteristics that are critical to a record's meaning, use or organisational value. Essential characteristics will differ according to record type and the business purpose served by the record. For example, a report contains a map where colours are used to signify different agricultural areas. These colours have meaning – the report could not be interpreted accurately if these colours were not preserved. Therefore the colours are an essential characteristic of the report and any migration performed on this report must ensure that this essential characteristic is maintained.

² During the migration, public offices can decide not to migrate all metadata components of a record. This must only be the case for those metadata elements that have no ongoing business or accountability relevance for the organisation. Decisions not to migrate certain metadata elements should be fully considered and comprehensively documented.

	• the formal migration or transfer process • the date and time of the migration and all personnel involved • all system configurations, including metadata definitions and mappings • all testing • all reports that compare original system functionality to target system functionality • all sign offs • any data cleanup performed • any variations to plans • any necessary variation in records design, metadata, format or content that will or have resulted from the migration
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2. Pre and post migration testing proves that authentic, complete, accessible and useable records can and have been migrated

<i>To be...</i>	<i>...the migrated record must be:</i>
Authentic	the product of well planned, comprehensive and successful migration processes
Complete	an accurate, legible reproduction of the source record in its entirety, including all its content, essential characteristics and all metadata identified as necessary
Accessible	available and readable to all those with a right to access it
Useable	able to serve the same business purposes as the source record and/or useable for ongoing reference

The testing to ensure that the migration process can deliver records that are authentic, complete, accessible and useable is divided into two phases: pre migration testing and post migration testing.

<i>Pre migration testing</i>	<i>Post migration testing</i>
Once a migration strategy has been determined and all appropriate planning steps have been performed, a test migration needs to be performed on a small sample of duplicated records. The resulting migrated records need to be assessed and verified by relevant technical and business staff to ensure that they are authentic reproductions, are complete, accessible and useable and that the migration strategy is appropriate. Should adverse effects be noted in the migrated records, a revised migration strategy must be devised. This strategy should also be subject to pre migration	Post migration testing must ensure that: • all records identified for migration have been migrated • all necessary functionality and essential characteristics have been retained • users are satisfied with the authenticity, completeness, accessibility and useability of the migrated record Post migration testing does not have to be performed individually on every record – testing at an aggregate level is appropriate. The number of records

testing. Pre migration testing needs to be documented. This documentation should provide the basis for the final migration plan. Once pre migration testing is complete, the pre migration testing and the finalised migration plan should be signed off by the Chief Information Officer or designated equivalent within the organisation.	selected for testing needs to be appropriate either statistically or commensurate with the risk/business need for the records (for example, the number can be proportionate to the number of records migrated and should, where relevant, include different record types across a range of years). All testing must be documented. Once post migration testing is complete, the migration process should be signed off by the Chief Information Officer or designated equivalent within the organisation.
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3. Source records are kept for an appropriate length of time after the migration to enable confirmation that the migration has been successful. The specific retention period will be based on organisational risk assessment.

Following their successful migration, source records must be kept for an appropriate length of time from the conclusion of post migration testing to allow for any unforeseen issues associated with the migration that may emerge following post migration testing to be identified and rectified. This will enable the migration to be repeated if it is discovered that some or all of the migrated records do not meet quality control standards or business requirements.

The retention period should begin to be calculated from the conclusion of successful post migration testing, where the migration and all outstanding issues associated with it have been signed off by the Chief Information Officer, or designated equivalent within the organisation.

Public offices will need to use risk assessments to determine an appropriate retention period. These risk assessments should at a minimum consider:

- the business purpose of the records
- the risks associated with this business
- the potential business, financial and legal implications of the loss of or damage to the migrated records
- the size and complexity of the migration and the likelihood of problems associated with it
- the complexity of the records being migrated
- the capacities of the target system and the possibility that all aspects of this system and its impact on the records are not fully understood at the time of migration, and, where relevant,
- the nature of the metadata that is not being migrated.

Public offices should always err on the side of caution and if any problems or concerns with the migrated or transferred records are noted, such as corruption of portions of the record, or loss of information or distortions in the records caused by the new capacities or functionality of the target system, then the initial identified retention period must be extended. Again, this additional retention period should begin to be calculated from the conclusion of successful post migration testing, where the repeated migration and all outstanding issues associated with it have been signed off by the Chief Information Officer or appropriate designated equivalent.

Retaining source records

It should be noted that this authority is not a requirement to destroy source records. In some situations, such as migrations between public offices, it may facilitate business processes for the transferring organisation to retain a reference copy of the source records for the length of their retention period, as specified in the relevant functional retention and disposal authority. Additionally, in high risk business environments, risk may best be mitigated by retaining source records as a managed copy of the new official records.

Cases where public offices need to keep source records indefinitely should be very rare. Virtually all source records should be able to be destroyed after their retention period has expired. Where a decision is made to continue to retain the source records as well as the migrated records cut off periods between use of the legacy system and the current system need to be established and enforced. This is necessary to ensure there is a means of establishing which version is to be relied on and used as the 'official' record going forward.

4. The disposal of source records is appropriately documented

To comply with this condition, care must be taken to document and preserve destruction and transfer information after the source records themselves have been destroyed. (For further information about the appropriate means to destroy records, see [Destruction of Records](#).)

For migrations within the public office, the documentation of the destruction of the source record can take a range of forms, including:

- metadata at the aggregate or system level which states that the previous version of this record group or system was destroyed on the specified date, by the identified authorised officer, in accordance with the conditions outlined in this authority
- metadata at a more granular level that documents the destruction of the previous version of specific files in accordance with necessary disposal requirements
- a final migration report that outlines the destruction of source records, providing enough detail to identify all records or groups of records that have been destroyed.

The situation is different for source records that remain following migrations between one organisation and another or between one organisation and State Archives and Records NSW. To document both the destruction of these source records and the migration/transfer of the records, a more detailed record needs to be retained. In addition to documenting the destruction of the source record and the authority for this destruction, a record must also be kept which identifies:

- the identity of all the records that have been transferred
- where the records have been transferred to, and
- the date of the transfer.

Whatever its form, documentation about records' disposal must be retained for the required periods of time. For example, the *General retention and disposal authority: administrative records* currently requires information about the disposal of records (by means of transfer to another organisation or destruction) to be retained for a minimum of twenty years. Where records have been transferred as State archives the documentation is required to be retained indefinitely.

2.2 Further guidance

For further guidance on managing migration processes please refer to:

- [*Decommissioning systems: records and information management considerations*](#)
- [*Effectively manage the migration of your digital records.*](#)

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