Scan, Migrate and Destroy Policy

2021

About this policy

This policy establishes a framework for ensuring compliant digitisation, conversion, migration and disposal practices for records to support information and records management at ASIC.

Document control

Policy ownership

The Senior Manager, Information Resource Centre (IRC) is responsible for the development and implementation of this policy.

Policy application

This policy applies to all areas of ASIC's operations, including the Companies Auditors Disciplinary Board (CADB) and Australian Taxation Office (ATO) Registry team members working on ASIC systems.

Policy application is subject to adoption by all Commission members, ASIC team members (permanent and temporary), members of the CADB, ATO Registry, secondees, consultants and contractors are expected to comply with this policy and supporting business rules.

Policy approval

This policy has been reviewed and approved by the following parties on the following dates:

Version	Approver	Approval date
V2	Warren Day, Chief Operating Officer	22 October 2021
V1	Greg Medcraft - Chairman	26 November 2015

Version history

Version	Details of changes/comments	Date
V2	Updated to reflect and cover: • NAA's new strategy – Building Trust in the Public Record • ASIC's mainly digital records environment • conversion and migration of records • remove references to SCT	October 2021
V1	Original policy	December 2015

Distribution

Version	Date	Distribution list
V2	October 2021	All Teams
V1	December 2015	All Teams

Policy location

This policy is located on **SharePoint** at Information & Records Hub - Home (asic.gov.au)

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A Policy objective

Purpose of this Policy

1 The purpose of this policy is to outline requirements and best practice principles for the:

(a) Digitisation, conversion, and/or migration of records;

(b) Capture and preservation of records; and

(c) Early disposal of the source records following digitisation, conversion, and/or migration.

2 This policy supports ASIC's Information and Records Management Policy with respect to ensuring that processes for the disposal of records are in accordance with Section 24 of the *Archives Act, 1983* and an appropriate Records Authority, specifically the *General Records Authority 31 for source (including original) records after they have been copied, converted or migrated* and associated guidelines.

Use of Terms

3 In this document, the terms:

(a) '**must**' refers to a legislative requirement that ASIC must meet;

(b) 'are required to' or 'is required to' refer to a control:

(c) to which ASIC cannot give a policy exception; or

(d) used in other documents that set controls;

(e) '**are to**' or '**is to**' are directions required to support compliance with the mandatory requirements of the policy; and

(f) '**should**' refers to better practice—we are expected to apply better practice unless there is a reason to apply alternative controls.

4 Refer to "Key Terms" at the end of the Policy for a detailed listing of terms used within the policy.

B Policy Statement

5 ASIC is committed to meeting its responsibilities under the *Archives Act, 1983* and implementing best practice with regard to records and information management practices and systems.

6 When digitising, converting, and/or migrating records, ASIC is committed to ensuring that:

(a) Copies are authentic, complete and usable reproductions of the source record;

(b) Copies are captured, stored and managed within authorised systems so that they can be relied upon as full and accurate record and remain accessible for as long as they are required;

(c) Copies and source records are retained in accordance with requirements as outlined within formally approved Records Authorities or relevant legislation.

(d) Source records are appropriately disposed once quality assurance has been performed on the copies.

7 All practices and procedures concerning the digitisation, conversion, and/or migration of records created or received by ASIC are to be in accordance with this policy.

C Policy Context

8 The digitisation, conversion, and/or migration of records provides a strategy for:

(a) reduced storage costs and space saving;

(b) reduced risk of deterioration of records (due to degradation or obsolescence);

(c) improved access and retrieval;

(d) integration with business information systems;

(e) ongoing management of records and metadata; and

(f) improved provisions for the control, preservation and protection of records.

9 ASIC business operations and activities are reliant on quality information that is accurate, reliable, complete, usable and accessible for as long as needed. Accordingly, effective quality assurance controls are essential if digitised, converted, and/or migrated records are to stand in place of source records, where ASIC will rely on scanned copies as official versions for ongoing business.

10 This policy provides the framework for ensuring that digitised, converted, and/or migrated records can stand in place of source records. It sets out requirements for retaining source records, and the ongoing management of digitised, converted, and/or migrated versions in accordance with the *Archives Act 1983*, the NAA's *General Records Authority 31 for source (including original) records after they have been copied, converted or migrated*, other records authorities (as applicable) and relevant guidance issued by the NAA.

11 This policy provides a framework for records that are digitised, converted, and/or migrated by third parties. This is to be done in consultation with ASIC's Information and Records Management team.

D Requirements for digitisation and migration of source records

Functional equivalence

12 Digitised, converted or migrated records must be considered functionally equivalent to the source records for the purposes of business, legal and archival purposes.

Digitisation of physical RNA records

13 All physical records of archival value (RNA), regardless of format, must be digitised in accordance with the National Archives of Australia's Preservation Digitisation Standards. These standards ensure that preservation digitisation activities produce a digital copy which is an effective long-term surrogate for paper and analogue originals. They also enable the creation of derivative files to meet access requirements and minimise the physical wear and tear caused by handling fragile collection items.

Paper records as a business-as-usual process

14 All physical records designated as business-as-usual can be digitised in accordance with the National Archives of Australia's Digitisation minimum specifications.

15 Physical records that are designated Retain as National Archives are not considered business-as-usual records.

16 You must use the business-as-usual specifications when all of the following apply

(a) Digitisation occurs as part of a business-as-usual process. For example, scanning incoming mail or invoices and capturing them in an approved business system.

(b) The records will or might be destroyed after digitisation in accordance with General Records Authority 31 (GRA 31). If disposal is not authorised under GRA 31, you must retain the source records unless the National Archives of Australia approves their destruction.

(c) The source records are of temporary value.

17 In this case, scanners and multifunction devices must be configured to use the National Archives of Australia's Digitisation specifications.

Captured in Authorised Systems

18 Digitised or converted records created or received by ASIC must be captured into ASIC authorised business information and corporate recordkeeping systems. Unless captured into an authorised business information system or corporate recordkeeping system, digitised or converted records cannot be regarded as ASIC's official records and original or source records must not be destroyed.

19 In order to demonstrate methods used to produce accurate and reliable reproductions of records, team members are required to record the following details:

(a) the individual, company or business area performing the digitisation, conversion, and/or migration;

(b) the date(s) the digitisation, conversion, and/or migration occurred;

(c) details of the equipment and/or process used;

(d) reference to ASIC digitation, conversion and/ or migration policies and procedures followed.

(e) Note: scanning documents using ASIC's MFDs will automatically capture this metadata as part of the scan process.

20 In addition, scanned images must be captured with the minimum mandatory metadata elements as outlined within Australian Government Recordkeeping Metadata Standard (AGRkMS).

Disposal of source records after Digitisation, Conversion and/or Migration

21 Digitised records must be retained within ASIC authorised systems for as long as they are required and disposed of in accordance with a current and approved Records Authority and are not subject to a disposal freeze.

22 Digitised paper records should be boxed, registered in the corporate recordkeeping system and stored for reference and quality control purposes for a minimum:

(a) **3 months** for small-scale digitisation, or records considered to be low risk; or

(b) **6 months** for large-scale batch digitisation, or records considered to be high risk.

23 Records that have been migrated should be retained for a minimum 3 months or as agreed in consultation with the Information & Records Management to allow quality assurance to be completed.

24 Source records should be destroyed via secure means and in accordance with General Records Authority (GRA) 31: *Source (including original) records after they have been copied, converted or migrated*.

25 Refer to ASIC's *Guidance on the Digitisation and destruction of original documents* and *Destruction Checklist* to understand specific legislative and regulatory requirements as applies to ASIC's information.

26 A risk assessment must be conducted to assess the likelihood that source records may be required as evidence to support information access requests or judicial proceedings.

27 Approval for the destruction of source records must be obtained by the relevant business area manager either on a case-by-case basis, or as a standing arrangement within defined guidelines.

28 The destruction of source records must be documented within the corporate recordkeeping system.

E Administration of this policy

Approval and implementation

29 This policy and future updates will be approved by the Chief Operating Officer following endorsement by Digital Governance Sub-Committee.

30 Executive Directors should be consulted prior to any major changes to the policy.

31 The roles and responsibilities listed in **Error! Reference source not found.**1 apply to obligations and requirements for the scanning, conversion, migration and destruction of ASIC information and records.

Table 1: ASIC roles and responsibilities applicable to this policy

Role	Responsibilities
All team members (including Commissioners)	must comply with this policy and associated business rules and procedures; and provide / seek advice on the scanning and destruction requirements that are unclear or require revision.
Chief Operating Officer	approves this policy; provide sufficient support and resources for ensuring successful implementation of requirements in accordance with this policy; promote compliance with this policy and associated business rules and procedures.
EDs, SELs, Senior Managers, Managers and supervisors	monitor team members under their supervision to ensure that they understand and comply with this policy and associated business rules and procedures.
Senior Manager, Information Resource Centre	develop strategies to support this policy; ensure that practices for the destruction of records complies with ASIC's obligations and responsibilities as a Commonwealth agency; ensure all team members are aware of requirements as set out in this policy
Information and Records Management team	create and maintain business rules and procedures to support this policy; promulgate this policy and associated business rules and procedures to all teams; monitor compliance with this policy; provide training and advice to all teams to ensure proper use of scanning hardware and software and compliance with requirements as set out within this policy and associated business rules and procedures.

Role	Responsibilities
ICT team members & teams responsible for purchasing and managing scanning hardware and software	ensure that scanning equipment purchased and used within ASIC is able to operate effectively in order to satisfy minimum requirements for the scanning of paper records as set out within this policy. regularly maintain and service scanning hardware and software to ensure the creation of high quality digital copies of paper records that meet both ASIC business requirements and scanning specifications outlined within this policy.
Managers/Officers responsible for engaging and managing contracted service providers	ensure that contracted service providers are aware of applicable ASIC policies and procedures; and ensure scanning specifications and requirements are included within contracts and arrangements where scanning is outsourced.

Monitoring and reporting

32 Compliance with this policy will be regularly monitored in accordance with established procedures by:

(a) People leaders;

(b) the Information and Records Management team; and

(c) senior management through the Executive Risk Committee

33 The Senior Manager, Information Resource Centre will review this Policy every 2 years, or earlier if required.

Key terms

Table 2: Key terms applicable to this policy

Term	Meaning in this document
All team members	For the purposes of this policy, all team members includes all Commission members, ASIC team members (permanent and temporary), members of the CADB, ATO Registry, secondees, consultants and contractors.
Business information system	Systems that create, keep and manage digital records and metadata (information about records), or manage metadata only while the records are held elsewhere. Examples include: finance, personnel, workflow, case management or ministerial correspondence systems.
Corporate recordkeeping system	An automated system used to manage the creation, use, maintenance and disposal of electronic and physical records, documents and content for the purposes of providing evidence of business activities. It maintains appropriate contextual information (metadata) and links between records, documents and content to support their value as evidence.
Destruction	The process of eliminating or deleting records beyond any possible reconstruction. (Source: National Archives of Australia Glossary of records management terms.)
Disposal	A range of processes associated with implementing appraisal decisions that include the: retention, deletion or destruction of records; migration or transmission of records; and transfer or custody of ownership of records.
Digital records	Digital records are records created, communicated and maintained by means of computer technology. They may be 'born digital' (created using computer technology) or they may have been converted into digital form from their original format (e.g. scans of paper documents).
Functional equivalence	Functional equivalence means that copies or reproductions have the same degree of authenticity, integrity, reliability and usability as the source or original records
Intrinsic value	Relates to the qualities and characteristics of a record that normally requires the record to remain in its original form. For example, a copy of an artwork would have much lower value than the original. (Source: Guidelines for using General Records Authority (31).

Term	Meaning in this document
Policy Owner	The person responsible for drafting, arranging approval, implementing, communicating, training and review of this policy.
Record	Information created, sent and received in the course of carrying out the business of your agency. Records have many formats, including paper, electronic, email, data and audio-visual. Records provide proof of what happened, when it happened and who made decisions. Not all records are of equal importance or need to be kept. (Adapted from: Archives Act 1983, Part I, Section 3; Standards Australia, AS-ISO 15489, Part 1, Clause 3.15.)
Records authority	An instrument issued by the National Archives of Australia to give its approval to Australian Government agencies or other organisations or persons to dispose of Commonwealth records.
Records management	Field of management responsible for the efficient and systematic control of the creation, receipt, maintenance, use and disposition of records, including processes for capturing and maintaining evidence of and information about business activities and transactions in the form of records. (AS ISO 15489 Part 1 Clause 3.16)
Review Date	The date two-years from the approval of the latest version of this policy.