

# Public Record Office Victoria

---

## GUIDELINE

### IMPLEMENTING THE STRATEGIC MANAGEMENT STANDARD

Version number: 1.0  
Issue Date: 1 August 2019  
Expiry Date: 1 August 2029

This guideline provides advice on implementing the following areas of the PROS 19/03 Strategic Management Standard:

- Valuing records
- Establishment, governance and accountability
- Strategic planning
- Policy
- Digital transition
- Assessment and measurement
- Transferring functions outside the Victorian public sector
- Transferring functions between Victorian public offices

# Table of Contents

<b>Introduction</b>	<b>4</b>
Public Record Office Victoria Standards	4
<b>1 VALUING RECORDS</b>	<b>5</b>
1.1 IDENTIFY RECORD ASSETS	5
1.2 PRIORITISING THE WORK	6
1.3 ASSIGN OWNERSHIP	6
1.4 DETERMINE THE VALUE OF RECORD ASSETS	6
1.5 ASSESS WHETHER THE RECORDS HAVE ANY RISKS ASSOCIATED WITH THEM	7
1.6 MANAGE ACCORDING TO THE VALUE OF THE RECORDS AND ANY RISKS ASSOCIATED WITH THEM	9
<b>2 ESTABLISHMENT, GOVERNANCE AND ACCOUNTABILITY</b>	<b>10</b>
2.1 ACCOUNTABILITIES AND RESPONSIBILITIES	10
2.2 ESTABLISHING AND MAINTAINING AN APPROPRIATELY RESOURCED PROGRAM	11
2.3 EFFECTIVE GOVERNANCE	11
<b>3 STRATEGIC PLANNING</b>	<b>12</b>
3.1 WHAT IS STRATEGIC PLANNING	12
3.2 WHAT SHOULD A RECORDS MANAGEMENT STRATEGY INCLUDE	12
3.3 APPROVAL, IMPLEMENTATION AND REPORTING	13
3.4 RISK MANAGEMENT AND BUSINESS CONTINUITY PLANNING	13
<b>4 POLICY</b>	<b>14</b>
4.1 WHAT IS POLICY	14
4.2 RECORDKEEPING POLICY	14
4.3 DEVELOPING POLICY	15
4.4 ADHERENCE AND MONITORING	15
<b>5 DIGITAL TRANSITION</b>	<b>16</b>
5.1 WHAT IS REQUIRED	16
5.2 WHY TRANSITION	16
5.3 WHAT DOES TRANSITION INVOLVE	18
5.4 OVERCOMING BARRIERS TO DIGITAL TRANSITION	18
5.5 POSSIBLE BUSINESS REASONS FOR CREATING AND MANAGING RECORDS IN PHYSICAL FORMAT	20
<b>6 ASSESSMENT AND MEASUREMENT</b>	<b>21</b>
6.1 WHAT IS REQUIRED	21
6.2 PERFORMANCE CRITERIA	21
6.3 METHODS FOR COLLECTING THE INFORMATION	22
6.4 ANALYSIS AND REPORTING	22
6.5 REPORTING AND UNDERTAKING REMEDIAL ACTION	22
6.6 EXAMPLE OF A MONITORING AND ASSESSMENT PROGRAM	23
6.7 REPORTING TO PROV WHEN REQUIRED	23

<b>7</b>	<b>TRANSFERRING FUNCTIONS OUTSIDE THE VICTORIAN PUBLIC SECTOR</b>	<b>24</b>
7.1	WHEN DOES THIS APPLY?	24
7.2	WHEN DOESN'T THIS APPLY?	24
7.3	WHAT IS REQUIRED	25
7.4	PLANNING AND PREPARATION	26
7.5	FINALISATION	26
<b>8</b>	<b>TRANSFERRING FUNCTIONS BETWEEN VICTORIAN PUBLIC OFFICES</b>	<b>27</b>
8.1	WHEN DOES THIS APPLY?	27
8.2	WHEN DOESN'T THIS APPLY?	28
8.3	WHAT IS REQUIRED	28
8.4	PLANNING AND PREPARATION	29
8.5	FINALISATION	29

# Introduction

## Public Record Office Victoria Standards

Under section 12 of the *Public Records Act 1973*, the Keeper of Public Records ('the Keeper') is responsible for the establishment of Standards for the efficient management of public records and for assisting Victorian public offices to apply those Standards to records under their control.

Heads of public offices are responsible under section 13b of the *Public Records Act 1973* for carrying out a program of efficient management of public records. The program of records management needs to cover all records created by the public office, in all formats, media and systems, including organisational systems.

It is mandatory for all Victorian public offices to follow the principles and comply with the requirements of the Standards issued by the Keeper.

This guideline provides advice on implementing the Strategic Management Standard. Further guidance can be found on the PROV website.

# 1 VALUING RECORDS

**PRINCIPLE:** Records must be treated as assets and managed according to their value and associated risk

## REQUIREMENTS

1. Records created and held across the organisation in all formats and business systems, must be identified and assigned an owner, who has responsibility for managing them in accordance with their value and associated risk.

## 1.1 IDENTIFY RECORD ASSETS

The record assets created and held across the organisation must be identified. Records are defined as the information created or received by people in the course of their work – they include databases, emails, social media posts, business systems, websites etc.

*A record asset is – a body of records which can be managed as a unit, because they are created by the same process, for the same purpose, have the same value and the same retention requirements.*

A record asset should be identified at the level which makes the most sense and is manageable for the particular case – for example at a collection, function or process level.

If you choose too high or broad a level, the records within that level will have different values and needs.

If you choose too low or granular a level, the work involved in identifying and managing the record asset will be too great. It is not practical to try to manage a record asset at a database entry, document or file level.

In some cases a system or database may be considered a single record asset. For example, a contact database. But many systems hold information with different values, created for different purposes. So in this case, you might start with a business system, then identify the different record assets it holds.

The records associated with a particular project might be identified and managed as a single information asset. However, for a major project, a number of record assets might be identified.

Examples of a record asset might be:

- a collection of internal organisational policies
- grant application and decision records
- case files or client files for a particular program
- the records of a board or committee or a number of boards and committees
- the records of an accreditation or authorisation process.

*There is no right or wrong level for identifying the record assets. If your organisation needs to do this for a different purpose – for example for completing an Information Asset Register or for insurance purposes – consider piggybacking on this process.*

## 1.2 PRIORITISING THE WORK

You might start by focusing on the most critical functions of the organisation and identifying the record assets associated with those functions. Then progressively identify the remaining record assets.

The Retention and Disposal Authorities (RDAs) your public office is subject to may be helpful, as they identify your organisational functions and give examples of the records created.

## 1.3 ASSIGN OWNERSHIP

For each identified record asset, an owner must be assigned. Many public offices keep an Information Asset Register, which specifies organisational owners and could be used to meet this requirement. Assigning ownership should be done formally through the governance structure, so that responsibilities are recognised and accountabilities set.

Assigned owners are responsible for ensuring the records are properly maintained and managed and resolving or escalating any issues which arise. This might be the system owner or the process owner. Ownership should be assigned to a role – for example, Manager Grants Program, Board Secretary, Assistant Director Client Services, Records Manager, Finance System Administrator etc.

## 1.4 DETERMINE THE VALUE OF RECORD ASSETS

Public offices must assess the value of record assets, so that resourcing and improvement activities can focus on those of most value, particularly if they are at risk.

Value can be divided into two types, with some record assets having both types of value.

<b>Business Value</b>	<p>The value of the record asset for supporting the public office to:</p> <ul style="list-style-type: none"><li>• undertake and continue their functions</li><li>• deliver programs, projects and services</li><li>• make good decisions and be able to explain and justify them</li><li>• protect the interests of government and the community</li><li>• maintain or enhance their reputation</li><li>• deal with complaints and resolve contractual issues</li><li>• develop policy based on evidence and provide high quality advice to government</li><li>• respond to commissions, inquiries, audits, investigations &amp; legal matters.</li></ul> <p>Plus the value the record asset has for those interacting with the public office – clients, members of the public, other government agencies, businesses, community organisations.</p>
<b>Permanent Value (Required as State Archives)</b>	<p>The continuing value of the record asset for government and the community. These are the assets needed to provide evidence of major Victorian public sector activities and decisions over time and how these have impacted people's lives and are retained as Archives of the State of Victoria.</p> <p>PROV works with agencies within an <a href="#">Appraisal Framework</a> to specify those records which have permanent archival value as part of developing and authorising RDAs. The appraisal process is guided by assessing the function the records serve against the following characteristics:</p> <ul style="list-style-type: none"><li>• the authority, establishment and structure of government</li><li>• primary functions and programs of government</li><li>• enduring rights and entitlements</li><li>• significant impact on individuals</li></ul>

- environmental management and change
- significant contribution to community memory.

*Note - RDAs are Standards established by the Keeper of Public Records. They specify the minimum retention periods for records created by different organisational functions. Those records identified as having permanent value must be transferred to PROV custody when ready access to them is no longer required by the organisation.*

**Remember –**

*Permanent value remains regardless of the age of the record.  
Business value will change over time.*

It is important to understand that business value will change over time. Records may be critical for enabling the public office to operate for two years, be helpful for a further five years, then have little value for conducting organisational business after that as they lose their currency. But the same records may also have permanent archival value and be required for transfer to PROV custody. Refer to the [RDAs](#) that apply to your public office for further information.

Old records may appear to have little business value UNTIL they are needed as critical evidence in a legal claim or for a royal commission.

## 1.5 ASSESS WHETHER THE RECORDS HAVE ANY RISKS ASSOCIATED WITH THEM

An important component of managing record assets according to their value involves assessing the level of risk associated with them. When record assets are assessed as having risks associated with them, effective treatments must be devised and implemented. There are three main types of risks:

### 1. Risks if the record is inappropriately released or used

Public offices need to assess the impact which would be caused by records being inappropriately released or used. Those public offices subject to the Victorian Protective Data Security Framework managed by the Office of the Victorian Information Commissioner (OVIC) will use the Business Impact Level assessment for this.

If the public office, government or community would be negatively impacted by the inappropriate release or use of the records, protective treatments need to be implemented. For example:

- restrictions might be placed on who can access records within systems
- restrictions might be placed on the actions people can take on records within systems (e.g. read only access, inability to copy)
- system action logs may be created showing who has accessed or copied records
- “clean desk” policies may be implemented and monitored
- physical storage locations might be locked.

Those public offices subject to the Victorian Protective Data Security Framework managed by OVIC are required to apply protective markings.

## 2. Risks if the record is not accessible and usable over time

Public offices need to assess whether records are at risk of loss or damage over time. This may be due to:

- systems aging
- formats becoming obsolete
- records and metadata not being migrated properly to new systems during system decommissioning
- adequate metadata not being applied to the records, so that they cannot be found or cannot be understood over time – records are not usable over time if their context and relationship with other records is not captured
- records being held in contracted arrangements, without the guarantee of ongoing accessibility and return to the organisation in accessible and usable formats if required
- records being “archived” or “backed up” in such a way that they cannot be easily and cheaply found and retrieved
- theft
- unauthorised destruction
- inappropriate storage conditions (temperature / humidity, flooding, fire).

Treatment will depend on the cause of the risk. Measures might involve procurement of new systems, development of an agreed process for system decommissioning and data migration, changes to system back-up arrangements, inclusion of clauses in contracts with outsourced providers to ensure records and metadata are returned to the organisation in accessible and usable formats, increased metadata capture requirements, increased security arrangements, changes to storage arrangements.

## 3. Risks if the record is accessible and usable BUT is not reliable and trustworthy

Cases might arise where a record is found and can be used, but there is uncertainty as to how reliable and trustworthy it is. This is about the quality of the record as evidence of actions and decisions.

Without the appropriate controls being applied to systems and processes, there might be uncertainty as to:

- whether the record is the final version or a draft
- whether the record was approved or authorised
- who wrote or authorised the record
- whether it is the version of the record that was sent or released
- the dates associated with the record – when was it created, approved, sent or released
- whether the record has been altered or could have been altered
- whether it is the full record and tells an accurate and complete story.

Measures need to be applied to systems and processes to ensure the record can be trusted as reliable and credible evidence of a decision or action.

These may include automated version control, workflow processes for authorisation / approval, automated capture of metadata such as author and action dates, automated logging of actions, access security controls, capture of metadata about associated records, document numbering in physical files, barcoding and registration of individual documents.

## 1.6 MANAGE ACCORDING TO THE VALUE OF THE RECORDS AND ANY RISKS ASSOCIATED WITH THEM

The value of the asset to the public office, to government and the community over time, should determine its priority and the amount of resources and attention given to managing it. Managing records as assets means taking a systematic approach to governance and management through their whole life cycle, so that value can be obtained from them. This also requires an assessment of the risks associated with the record assets, so that effective treatments can be implemented.

Attention and resourcing should focus on those record assets which have:

- high business value for a period of time; and / or
- permanent value.

*If records have high business value and / or permanent value and are assessed as having risk associated with them, urgent action must be taken.*

*Following the Principles and meeting the Requirements of the PROV Recordkeeping Standards will ensure you are managing records and the risks associated with them effectively.*

### EXAMPLES OF VALUE AND HOW TO TREAT ASSOCIATED RISKS

#### Example 1

A business system containing a mix of permanent and temporary business-critical information is coming to the end of its life. The system has been unstable for some time. The record assets have been assessed as being of permanent or high business value and at risk of loss.

To address this, it is decided to procure a new system, which will ensure the records are available and useable for the time they must be retained and that permanent value records and the required metadata can be transferred to PROV's Digital Archive as VERS Encapsulated Objects (VEOs).

The new system will be chosen and configured to ensure the necessary recordkeeping controls are in place, so that records are protected against unauthorised use, alteration or release.

It is realised that there are risks involved in migrating records and associated metadata from the old system to the new system, so this is carefully considered and planned. The records and metadata within the new system are checked for completeness and useability before the old system is decommissioned.

#### Example 2

A set of physical files are held in an unlocked filing cabinet in a manager's office. They include supplier proposals for a high cost tender which is currently underway. Information about the files, including their location, is registered in the EDRMS and accessible to all users. These files have been assessed as being of high business value for a period of time and at risk of a security breach.

To address this, it is decided to:

- move the files to a locked cupboard where only those who legitimately need them have access
- restrict access to the physical file details in the EDRMS
- instruct staff using the files that they cannot be left on their desk and must be locked away when not being actively used (Clean Desk Policy)
- closely monitor the location of individual files while the tender process is underway.

# 2 ESTABLISHMENT, GOVERNANCE AND ACCOUNTABILITY

**PRINCIPLE:** An appropriately resourced records management program must be established and maintained, with effective governance and clear accountabilities

## REQUIREMENTS

1. The head of the public office is accountable and responsible for organisational compliance with the Standards established under the *Public Records Act 1973* by authorising strategies and policies and regularly informing staff about complying with recordkeeping requirements.
2. An effective governance structure for records management must be established, maintained and incorporated into the organisational governance processes.
3. An appropriately resourced records management program must be established and maintained.
4. Those responsible for records management must have the necessary expertise and skills.
5. Those responsible for records management must be given the authority to ensure the records held in systems across the organisation are effectively managed from creation to disposal.

## 2.1 ACCOUNTABILITIES AND RESPONSIBILITIES

Under the *Public Record Act 1973*, the head of each Victorian public office is responsible for ensuring the organisation complies with PROV Standards.

This means the head of the public office is responsible for:

- establishing and maintaining a records management program
- ensuring it is properly resourced
- ensuring effective governance arrangements
- authorising strategies and policies and
- providing direction to the organisation on compliance with recordkeeping requirements.

In most public offices, responsibility for the recordkeeping program will be delegated, but the head still has an important role in signalling support and making it clear that good recordkeeping is valued and required.

If accountability for the records management program is delegated to another role by the head of the public office, this role needs to be senior enough to ensure records management is effectively governed, enforced and resourced.

Those with operational responsibility for records management must have the necessary expertise and skills. Where there are gaps, active measures should be undertaken to upskill staff or source the necessary expertise.

It is important to recognise that records are created and held across the organisation in many business systems. Those with operational responsibility for records management must be given the authority to ensure effective recordkeeping controls are implemented across organisational systems and processes.

## 2.2 ESTABLISHING AND MAINTAINING AN APPROPRIATELY RESOURCED PROGRAM

The appropriate level of resourcing will vary greatly among organisations. A large public office will require a skilled and qualified team of people whereas in a very small public office a sole person may be responsible for records management in addition to other areas.

If a public office is complying with the requirements of the PROV Standards or making steady and sustained progress towards compliance, then the resourcing is probably adequate. If this is not the case, then the resourcing for the program needs to be reconsidered and increased if necessary.

## 2.3 EFFECTIVE GOVERNANCE

Governance refers to the mechanisms by which an organisation is controlled and held to account.

The purpose of governance is to ensure:

- compliance with legislation, regulations, codes and standards
- identification and management of risks
- responsible and efficient conduct of the organisation and accountable management of resources.

Some public offices are governed by a Board with external appointed members. In other public offices, the top level of the governance structure will be the Executive Committee. In large organisations there may be a complex governance structure with a number of committees reporting to the Executive Committee. The distribution of powers, responsibilities and accountabilities will be embedded into the governance structure.

Governance bodies will usually:

- determine and oversee the audit/compliance/risk management programs
- receive audit, compliance and risk assessment reports and determine the actions and resources needed to remediate any issues
- approve or endorse strategies, policies and plans, including resourcing requirements
- receive reports on progress against strategies and plans
- receive reports on major issues, breaches or risks and determine the actions to be taken.

In order to be visible and obtain support and resources, it is important that the records management program is reported on to the governance structure and included in audit and compliance programs.

A starting point might be to:

1. develop a Records Management Strategy – either as a standalone document or as part of a broader organisational strategy.
2. have this approved through the governance structure.
3. regularly report progress against the strategy to the governance structure.

In a larger organisation this may involve reporting to a subcommittee (e.g. an Information Management Committee) which then reports to the Executive Committee.

# 3 STRATEGIC PLANNING

**PRINCIPLE:** Records management must be strategically planned in alignment with other relevant strategies and endorsed, resourced and implemented, with regular monitoring and reporting

## REQUIREMENTS

1. An executive endorsed records management strategy must be developed. This may be a separate document which aligns with other relevant strategies or can be an integrated part of a larger strategy.
2. The strategy must be resourced and systematically implemented, with records management progress monitored and regularly reported through the governance structure.
3. Risks to records held in all formats across the organisation must be included in security, risk and business continuity planning with effective treatments implemented as needed.

## 3.1 WHAT IS STRATEGIC PLANNING

Strategic planning results in an agreed vision of the desired future state, usually 3-5 years in the future. The process requires stepping back from day to day operational concerns and is most effective when involving people from a range of areas and disciplines.

Examples of vision statements are:

- The organisation has transitioned to end to end digital processes for key functions.
- Compliance with recordkeeping requirements has been designed into organisational processes and systems.
- Records are treated as strategic assets which underpin all organisational functions and outcomes.
- Digital records are readily accessible to all authorised staff to support interactions with clients.

Once the desired future state is agreed, strategic planning involves determining the high level goals and objectives and the actions and resources required to achieve them.

## 3.2 WHAT SHOULD A RECORDS MANAGEMENT STRATEGY INCLUDE

For a records management strategy to be effective, it has to explicitly support organisational goals and priorities. This means making clear:

- how the recordkeeping improvements and actions in the strategy will help to achieve organisational goals
- the impacts and risks that poor recordkeeping will cause the organisation.

Without these links, there is a risk the strategy may not be supported and resourced.

The records management strategy may be a separate document which aligns with other related strategies. Or it may be part of a larger strategy. For example, it may be part of an Information Management Strategy or a Corporate Services Strategy.

A strategy usually includes:

- a vision or direction statement (usually setting out what the desired state should be in 3-5 years' time)
- an explanation of why reaching that vision or state is important and beneficial
- the high level goals or objectives to reach that state
- the actions or sequence of steps required to meet the high level goals or objectives
- the changes / projects and resourcing required to meet the high level goals or objectives
- how progress against the strategy will be measured (milestones, targets etc.)
- how progress will be monitored and reported on and issues resolved (i.e. quarterly progress reports against milestones, targets and project budgets to the Information Management and Technology Steering Committee).

Some strategies will also include a:

- description of the current state, highlighting strengths and weaknesses and current issues
- high level implementation plan, possibly with timeframes and responsibilities.

Most organisations will have a strategy template and a standard way of developing them. It is important that records management strategy follows the usual organisational approach and is formally included in the suite of organisational strategies.

### 3.3 APPROVAL, IMPLEMENTATION AND REPORTING

The Strategy needs to be approved or endorsed by executive level management, usually through the organisational governance structure. This may involve submitting the strategy directly to the Executive Committee or it may need to move through various sub-committees first. A commitment to resourcing and implementing the strategy needs to be obtained.

Progress against the strategy needs to be measured and reported on to the governance structure. The reporting may be against milestones, targets and / or expenditure. Without reporting progress to a senior body, the strategy will lose momentum and visibility. This will also provide the opportunity to report any issues or challenges which arise and to obtain direction and, if needed, further resourcing.

### 3.4 RISK MANAGEMENT AND BUSINESS CONTINUITY PLANNING

It is critical that recordkeeping be included in risk management and business continuity planning. This needs to be thought about in a number of ways:

Risks to the record assets themselves – for example:

- risks related to the security of the record and the information contained (*i.e. access restrictions not set, insecure storage, no audit logs*)
- risks to the record continuing to be available, readable and usable for the duration of its retention period (*unreliable system, poor metadata, poor storage, inability to access from backups etc.*)

Risks to the organisation if full, accurate and trustworthy records cannot be accessed and used when needed. For example, the business impact if contract variation or client interaction information is not available when needed.

# 4 POLICY

**PRINCIPLE: Records management policy must be developed, endorsed at an executive level, regularly communicated and adhered to across the agency**

## REQUIREMENTS

1. An executive endorsed records management policy must be developed and regularly communicated across the organisation. This may be a separate document which aligns with other policies or be an integrated part of a larger policy.
2. All areas of the public office must adhere to the policy and this adherence must be monitored and reported on, with all remedial action taken where necessary.

## 4.1 WHAT IS POLICY

Policy sets out the agreed position or set of guiding principles on a matter. The purpose is to guide decisions and actions in a consistent and rational way. Policy needs to be high level and applicable to different scenarios over time. It needs to be reviewed and updated regularly in order to reflect changes and ensure it remains relevant and useful.

## 4.2 RECORDKEEPING POLICY

There may be a separate records management policy or recordkeeping policy statements may be part of other policies. Policy relating to recordkeeping must be endorsed by the executive, through the normal governance structure. It must form part of the set of corporate policies and used to guide the decisions and actions. Most organisations will have a standard template and method for developing and approving corporate policies.

Other policy areas where statements related to recordkeeping might be required include:

- Contracting and outsourcing
- System procurement and system decommissioning
- Information management/Information Systems
- Disaster recovery
- Client services
- Corporate support
- Risk management
- Hosted services or storage (software as a service, cloud services or storage)
- Security and privacy
- Information access
- Data sharing
- Protected disclosure
- Social media
- Mobile technologies
- Risk management

## 4.3 DEVELOPING POLICY

Recordkeeping policy needs to support the goals of the public office and align with other organisational positions. If there are areas of disagreement or misalignment, the policy development process can be used to negotiate and come to an agreed position. For example, in relation to the use of outsourced digital storage providers or the use of mobile technologies.

Developing recordkeeping policy requires understanding the legislative, regulatory and policy environment. There may be particular requirements which will affect recordkeeping policy. For example, some public offices are subject to the Victorian Protective Data Security Framework developed by OVIC. Other public offices may be subject to government or sector policy on digital transition, cloud storage arrangements, data sharing etc.

It is also important that the needs of stakeholders are taken into account. This means determining who will be impacted by the policy position and what the impact will or could be. Then, if possible, engaging with stakeholders during the policy development and approval process. For example, if the policy position states that business unit managers will be responsible for ensuring staff comply with recordkeeping requirements, then you need to consult with business unit managers to ensure they understand and support this.

### EXAMPLES OF POLICY STATEMENTS

Here are some examples of the sorts of statements / principles which might be included in policies:

- Records can only be destroyed in accordance with the appropriate authorised RDA.
- Recordkeeping requirements must be identified and addressed when specifications for new systems are being developed.
- Records must be captured into the appropriate system at the point of creation or receipt.
- Recordkeeping requirements must be assessed when planning the outsourcing of service arrangements. If requirements are identified, they must be included in the service contract.
- The head of each business unit is responsible for ensuring compliance with records management requirements. This includes supporting and contributing to periodic audits and assessments of business processes and systems.
- The identified business owner of a system is responsible for ensuring compliance with recordkeeping requirements.
- All staff members are responsible for ensuring full and accurate records of decisions and activities are created and captured into the appropriate system. This includes ensuring information is kept securely and only released when authorised to do so.

When writing policy for recordkeeping, it may be useful to copy wording from the principles or requirements in the PROV Standards, adjusting and adding as necessary.

## 4.4 ADHERENCE AND MONITORING

Policy is effective if it used to guide actions and make rational and consistent decisions. Policies need to be regularly communicated so that all staff know where to check before taking actions or making decisions.

In the same way that a manager would check the Long Service Leave Policy before approving an application, the different areas of the business should check and apply policies relating to recordkeeping where relevant. This will only happen if there is widespread awareness and if the policy position is clear and easy to apply.

Adherence to recordkeeping policy should be checked through organisational auditing and assessment processes. If an issue relating to recordkeeping arises, a check should be made to ensure there were no policy breaches. Issues with adhering to the policy or breaching the policy should be reported through the governance structure. Remedial action must be taken if needed. This could include disciplinary action for breaches such as unlawful destruction of records or inappropriate release of information.

# 5 DIGITAL TRANSITION

**PRINCIPLE: Records must be created and managed digitally**

## REQUIREMENTS

1. Public offices must plan and progressively transform processes so that they become fully digital.
2. Records must be created and managed digitally, unless there is a sound reason for creating and managing them in physical format.

## 5.1 WHAT IS REQUIRED

The PROV Strategic Management Standard requires organisations to create and manage records digitally, unless there is a particular reason why some records need to be created and managed in physical formats.

It is recognised, however, that many public offices are still in a transitional phase and may not have the systems, processes or resources to fully enable this.

Public offices must, therefore, plan for achieving this over time. Planning will depend on:

- the legislative and regulatory environment – there may be things which must be done or which can't be done
- organisational priorities
- existing technical infrastructure and systems
- available resources
- available expertise
- expectations and needs of clients / stakeholders
- level of digital literacy of staff / clients
- complexity of processes and requirements.

## 5.2 WHY TRANSITION

Creating and managing records digitally has many benefits, as long as effective recordkeeping controls are implemented in systems and processes.

This means that processes and systems need to be designed and managed, so that full, accurate, reliable and trustworthy digital records are created and can be used for authorised purposes, for as long as they need to be retained.

For many organisations, digital transition is a strategic objective or is required by a government or sector strategy or policy.

Creating and managing records digitally, as part of effective and well-designed digital business processes, will enable:

- information to be found quickly and easily
- reduced risk of information loss
- increased ability to share and re-use information
- increased ability to apply security and access controls to personal, sensitive or confidential records
- faster timeframes for business processes
- increased ability to respond to inquiries, investigations, audits, complaints, legal issues
- better decision-making, reporting and policy development as quality records provide full, accurate, reliable and trustworthy information
- enhanced service delivery – people expect to interact with government through seamless online processes
- reduced use of paper – helping to meet environmental targets.

For many organisations, arguing that transitioning from paper to digital processes will reduce costs may not be effective. While it will reduce costs for purchasing paper and paying postage, purchasing and maintaining printers and photocopiers, secure destruction services and, eventually, commercial storage, these savings may be reasonably small and offset by the cost of technology.

Arguing that digital transition will result in cost savings may be effective in cases where:

- the organisation has to send out large mail outs – doing this via email would save the cost of paper, envelopes, printing and postage, plus the staff time required to print, assemble and stuff envelopes.
- it will save processing time for high volume transactions and you can calculate the staff time saved over the course of a year (e.g. staff being paid \$30 per hour will save 5 minutes per transaction = \$2.50 per transaction and there are 40,000 transactions each year = \$100,000 saving per year)
- it will reduce the amount of office rental space required – this argument may be effective where the organisation is growing or is having to relocate and you can demonstrate that digital transition will substantially reduce the office space required.

**Note** – *benefits will not be realised if systems and processes are poorly designed or managed. In fact, the situation could become worse!*

*Following the Principles and meeting the Requirements of the PROV Standards will ensure the creation, capture and effective management of full, accurate, reliable and trustworthy records and enable these benefits to be obtained.*

## 5.3 WHAT DOES TRANSITION INVOLVE

Digital transition means changing work processes so that they are undertaken and delivered in a fully digital way, without the use of paper. Instead of the organisation creating and relying on paper records, the information will be retained in digital format, for example within a database, a case management system or an Electronic Document Management System. So the systems creating and storing the records need to be designed and managed so that recordkeeping controls are in place.

Digital transition involves:

- people changing the way that they work
- processes being redesigned so that are fully digital from beginning to end
- technology being used to enable efficient end to end digital processes
- technologies being used to capture information and metadata to form full, accurate, reliable and trustworthy records, which can be accessed and used for the period of time they are required.

It is critical that those responsible for records management and ensuring compliance with PROV Standards are included in digital transition planning. Effective recordkeeping controls must be embedded in the design and operation of systems and processes, for benefits to be realised.

Digital transition may occur as part of a systematic and deliberate “big bang approach”, with a strategy, a governance structure, a program with multiple projects, dedicated resourcing and a reporting regime. This approach requires executive support and organisational commitment.

Or it may occur more organically through individual business processes progressively moving from paper or hybrid paper-digital processes to fully digital processes. This may be due to the efforts of a particular team (i.e. the Records Management team) or due to a number of business areas coincidentally transitioning processes.

If there is not senior or widespread support, an effective strategy can be to pilot the transition of one particular process or area and then promote the resulting benefits and efficiencies to the executive and the organisation.

## 5.4 OVERCOMING BARRIERS TO DIGITAL TRANSITION

Common barriers to digital transition are:

- digital transition is not an organisational priority – executive do not see that there is a return on investment, are comfortable with current processes or are focussed on immediate deliverables
- technology is limited or ageing and there may not be the resources to replace it
- clients or partners do not have the technology to engage digitally with the public office
- public office does not have the staff with the necessary expertise to deliver the transition and there are no resources to buy this expertise in
- belief (e.g. at executive level) that digital recordkeeping is risky or non-compliant with legislation or standards - for example that “wet” signatures are required
- resistance to change – there may be longstanding processes in place and staff or clients may not wish to change – “if it’s not broken, why fix it”
- digital literacy of staff or clients is low
- immediate priorities and workloads mean there is insufficient time to plan and deliver change – there may be a desire for change but it is always something that will be done in the future.

If digital transition is an organisational priority, it is critical that recordkeeping requirements are understood and addressed in the planning and delivery of the programs / projects. This will involve persuading those governing and managing the process of the necessity and benefits of recordkeeping controls being included and implemented.

If digital transition is not a priority and there is resistance to change, consider undertaking a pilot project to transition one key process. This can be particularly effective when the current process is considered laborious or time-intensive. Then promote the benefits of this transition and use it to gain support for further projects.

In cases where technology is limited but there is no resourcing allocated for replacement or redevelopment, there are two possible approaches. One approach is to report regularly on system issues and failures, demonstrate how this is impacting organisational priorities and build support for resourcing allocation over time. Another approach, which may be the only option where resourcing is extremely constrained, is to try to improve existing technology through configuration or the use of cheap or open source additions.

Look for champions and potential partners within the organisation. Try to leverage from other organisational projects. For example, if a new system is being procured or a program or service is being reviewed and revised, try to introduce a digital recordkeeping component into this. Where resources are limited, this will be particularly important. When advocating or planning change, it is crucial to understand who will be impacted by it and involve them in the process redesign where possible.

If there is an organisational crisis or issue, try to use this as an opportunity to advocate for end to end digital processes. For example, if a report shows that complaint handling is slow and that some complaints are lost and never responded to, argue for the introduction of a fully digital process, with effective workflows, response monitoring and reporting and immediate and easy access to all of the necessary information, including similar past responses.

Look for opportunities to deliberately upskill staff with responsibility for records management within the organisation. This can be through formal training, attendance at forums and seminars, discussion groups, visits to organisations where successful digital transition has occurred or making articles, webinars and case studies available.

If the digital literacy of staff or clients who will be following the processes or using the systems is low, designing easy user-interfaces for systems, developing very clear and thorough instructions and providing support will be vital. Often, a level of technical knowledge is assumed by system or process implementers, which is frustrating and demotivating for those with little understanding.

Another approach is to try to increase digital literacy generally through induction processes, training modules and awareness campaigns. But for many people, upskilling will only occur when using the actual systems and following the actual processes.

## **DOES THIS MEAN EXISTING PHYSICAL RECORDS NEED TO BE DIGITISED?**

Digital transition does not require public offices to digitise existing physical record holdings. In most cases, the cost of digitisation would not make this a sensible business decision.

However, some public offices may choose to digitise some existing physical records. Possible reasons could be:

- staff need constant or urgent access to the records
- the organisation needs to easily share the information contained in the records
- they are part of a process where some information is held digitally and it will be more efficient for all of the records to be held digitally
- there is limited physical storage space and commercial storage is not suitable as urgent access is needed to the records or the records are highly sensitive / confidential.

**Note** – In many cases digitised records can be treated as the official record and the original source record destroyed. Check the Retention and Disposal Authority for Digitised or Converted Records. If the RDA authorises the disposal of the original source records, this is contingent on a number of conditions being met, including compliance with PROV's Digitisation Specification.

## 5.5 POSSIBLE BUSINESS REASONS FOR CREATING AND MANAGING RECORDS IN PHYSICAL FORMAT

There may be sound business reasons why some records need to continue to be created and managed in physical formats or as part of a hybrid physical-digital process for a period of time. But this should be rare and treated as an exception.

For example, a particular client group may need to send and receive correspondence in physical format. This might mean that a hybrid paper-digital process is retained for a period of time.

For example:

- letters or forms are received in physical format and scanned
- the scanned letter or form is sent electronically to the appropriate staff member
- the response is prepared digitally, but then printed and sent out in physical form
- the scanned copy is treated as the official record and stored, with the response letter, digitally in the appropriate system.

**Note** - *But these cases need to be assessed carefully to ensure there is a sound need to continue to create and manage records in physical format. For example, in most cases, digital records are accepted as evidence in court cases.*

# 6 ASSESSMENT AND MEASUREMENT

**PRINCIPLE:** Recordkeeping performance across the organisation must be monitored and regularly assessed and reported on, with remedial action taken when necessary

## REQUIREMENTS

1. Performance measures for recordkeeping practices across the public office must be set and regularly reported on through the standard organisational reporting processes. When the public office has an Audit Program, recordkeeping must be included within this.
2. Remedial action must be resourced and implemented when issues and weaknesses are identified.
3. When required by PROV, public offices must report on their records management performance or practices.

## 6.1 WHAT IS REQUIRED

Recordkeeping performance across the public office must be monitored and regularly assessed and reported on. This involves designing a recordkeeping assessment program which will address your organisation's needs, highlight issues and weaknesses and result in systematic improvements over time.

For each type of assessment, the public office needs to determine the performance criteria, the assessment method and how the results will be analysed and reported, so that improvement activities are supported and can occur.

## 6.2 PERFORMANCE CRITERIA

Type	How this is expressed	Examples
A requirement or set of requirements which need to be complied with	Usually expressed as performance statements May require a Yes / No Response or involve choosing between a number of maturity levels	PROV's IM3 Tool PROV's Recordkeeping Assessment Tool
A measurable level of performance which needs to be reached	Usually expressed as a target or performance indicator i.e. Key Performance Indicator (KPI)	% of records with disposal requirements assigned Number of people in organisation who have attended records management training during the year % of systems holding permanent records which meet VERS requirements % of record retrieval requests met within 24 hours

## 6.3 METHODS FOR COLLECTING THE INFORMATION

Once the criteria have been determined, the method or technique for collecting the performance information can be determined.

Methods include surveys, questionnaires, interviews or observations. In some cases, the information is obtained through system functionality i.e. by running system reports to obtain statistics.

The information may be gathered through the organisation or a section of the organisation undertaking self-assessment or by an independent person gathering the data. The independent person or team could be an internal auditor or an external auditor including an officer from the Victorian Auditor-General's Office.

Consider whether written justification or evidence should be provided as part of the assessment. External auditors usually require evidence to be provided. For example, if it is asserted that a Records Management Strategy has been developed and is being implemented, the assessor may require:

- a copy of the Strategy to ensure it is adequate
- evidence that it has been approved by the governance structure (e.g. approval via email from the head of the public office or delegate or approval documented in the minutes of the Information Management Committee)
- evidence that funding has been allocated
- Progress Reports demonstrating the implementation.

## 6.4 ANALYSIS AND REPORTING

Monitoring and assessment results need to be analysed, to provide findings. Recommendations may also be produced. These findings (and recommendations if applicable) need to be reported through the standard organisational reporting channels.

Reporting against targets and performance indicators may also be done in monthly, quarterly and / or yearly reports. Where there is an Audit Program, records management must be included in this.

## 6.5 REPORTING AND UNDERTAKING REMEDIAL ACTION

The public office must:

- report the measurement or assessment results / findings through the organisational governance / reporting processes
- resource and implement remedial actions / improvement activities when issues or weaknesses are identified
- monitor and report on the progress of implementing the remedial actions / improvement activities, escalating and reporting if issues arise.

Reporting results through the appropriate channels is critical for ensuring that proper attention is paid and improvement or remedial actions are supported and undertaken. Progress on implementing these improvement activities should then be monitored and reported on.

The aim is to “close the loop” – with a systematic program of:

- monitoring and assessment activities undertaken
- results gathered and analysed
- results and findings reported through the appropriate channels
- any remediation / improvement activities determined, supported, resourced and undertaken
- monitoring and reporting of progress on remediation / improvement activities.

## 6.6 EXAMPLE OF A MONITORING AND ASSESSMENT PROGRAM

To improve recordkeeping across the organisation, public offices usually need to perform a range of assessments.

For example, a public office might:

- report against records management targets / key performance indicators every month or quarter
- undertake a formal audit of organisational compliance with the PROV Standards every two years and produce a report
- have a rolling program of assessing each business unit against organisational recordkeeping requirements every three years and produce a report comparing results
- include recordkeeping requirements in business system audits.

## 6.7 REPORTING TO PROV WHEN REQUIRED

When required to do so, public offices must report on their records management performance and practices to PROV. PROV may require public offices to respond to written requests, complete and submit assessments or surveys, or provide information during a site visit or inspection.

# 7 TRANSFERRING FUNCTIONS OUTSIDE THE VICTORIAN PUBLIC SECTOR

**PRINCIPLE:** When a function is transferred permanently outside the Victorian public sector, legislative instruments or agreements must specify arrangements for the public records created prior to the function transfer date to ensure that the public records are protected and remain accessible for as long as required.

## REQUIREMENTS

1. When a function is transferred to a non-government body, the original public records must remain with the responsible Victorian public office. Duplicate public records can be provided to the non-government body taking responsibility for the function.
2. When a function is transferred to a government body outside Victoria, the responsible Victorian public office must assess whether it requires original or duplicate public records to meet information needs and obligations. Approval must be given by the Keeper of Public Records before original public records can be transferred to the government body taking responsibility for the function. Any conditions set by the Keeper of Public Records must be met.

## 7.1 WHEN DOES THIS APPLY?

This Principle and these Requirements apply to the rare occasions when a function is permanently transferred outside the Victorian public sector.

For example, when a function is permanently removed from a Victorian public office to:

- a Commonwealth public office
- a national body
- a private sector organisation
- a non-government organisation or not for profit organisation.

## 7.2 WHEN DOESN'T THIS APPLY?

This Principle and these Requirements do not apply to situations:

- where arrangements are made for functions to be performed on behalf of the public office, for a period of time, under a contractual arrangement or agreement – see *Operational Management Principle 5 Contracting*
- the Victorian public sector retains some control over the function (e.g. through transfer to a State Owned Enterprise or a public-private partnership) – see *Strategic Management Principle 8 Transferring Functions Between Victorian Public Offices*.

## 7.3 WHAT IS REQUIRED

Instruments and agreements must include arrangements for the records created up to the time of the transfer. It is essential that records are protected and managed so that:

- the Victorian government continues to have access to the information they need to successfully function and meet their obligations over time
- organisations and people interacting with the Victorian government or impacted by their decisions and actions are able to access information through the usual channels.

### FOR TRANSFER TO A NON-GOVERNMENT BODY OUTSIDE THE VICTORIAN PUBLIC SECTOR

The original records created up to the time of transfer must remain with the Victorian public office.

Duplicates of the records can be transferred, but privacy, confidentiality and security requirements need to be considered and addressed.

For example, if a function is privatised, the original records created up to the time of transfer must remain with the Victorian public office but copies can be made and transferred to the private body.

The reason for this is that there can be no real assurance that a non-government body will continue to:

- protect and retain the records beyond their own immediate need; and
- meet information access obligations.

### FOR TRANSFER TO A GOVERNMENT BODY OUTSIDE THE VICTORIAN PUBLIC SECTOR

The Victorian public office needs to assess whether it requires the originals or whether a duplicate of some or all of the records would suffice. The needs of stakeholders (i.e. clients, partners, other government bodies) should be taken into account. This assessment would probably be negotiated between the Victorian public office and the other government body.

If the Victorian public office would like to transfer:

- duplicates of the public records, it can proceed with this
- original public records, approval must first be sought and obtained from the Keeper of Public Records. Approval must be sought in writing, with details of the arrangements and the records

The reason for allowing the transfer of original public records to a government body outside the Victoria public sector, if Keeper approval has been obtained, is that the records will then be subject to that jurisdiction's archival and information access legislation. So there can be much higher confidence that obligations will be met.

**Note:** *the Keeper may specify conditions and approval is contingent on these being met.*

## 7.4 PLANNING AND PREPARATION

Victorian public offices should discuss arrangements with PROV and seek their advice during the planning phase. All of the relevant records need to be identified, including those held in different systems, published as online content or held in non-current storage (digital or physical).

If a Victorian public office is planning to digitise records for either their own use or to transfer to the other body, it is recommended that the PROV Digitisation Specification be used.

Whether transferring original or duplicate records, care must be taken to ensure the full record and all of the required metadata is transferred. This is critical for ensuring that the records can be identified, retrieved and understood in the future. PROV's Metadata Specification may be of use.

The Victorian public office and the receiving body will need to determine the formats and methods for transferring the records. PROV's Long Term Sustainable Formats Specification may be of use.

Any privacy, confidentiality and security requirements need to be considered and addressed.

As part of the planning, consideration needs to be given to transferring original permanent digital and physical records to PROV. This can be an ideal time for securing funding for this and will ensure these records are protected and accessible for the future.

Resourcing and responsibility for the different aspects of transferring functions outside the Victorian public sector needs to be determined by the involved parties. Resourcing will be required for identifying, planning, preparing and migrating / relocating records, whether the transfer involves original records or duplicates.

## 7.5 FINALISATION

Ensuring that the full records, with required metadata, have been successfully transferred and are accessible and usable is crucial, irrespective of whether the transfer involves original records or duplicates. No destruction or system decommissioning should take place until successful transfer has been verified and these actions are authorised by the public offices involved.

Victorian public offices must ensure they keep a record outlining, at a high level, the record collections transferred. This should include details of any arrangements made for enabling the Victorian government or community to access the transferred records if needed.

# 8 TRANSFERRING FUNCTIONS BETWEEN VICTORIAN PUBLIC OFFICES

**PRINCIPLE:** When a function is transferred between Victorian public offices, arrangements for the affected records must be planned and completed to ensure needs and obligations can be met.

## REQUIREMENTS

1. All records of the function being transferred must be identified. This includes records held in organisational systems, in outsourced arrangements and in storage (digital and physical).
2. The involved public offices must plan, resource and implement arrangements for the affected records. This includes confirming that records have been successfully transferred .
3. Current records (and associated metadata) relating to the function must be transferred with it, in an accessible and usable format agreed between the organisations. (If needed, a duplicate of the records can be retained by the original public office).
4. The minimum required retention periods for non-current records must be determined before the transfer occurs. Where there is no current Disposal Authority, disposal authorisation must be obtained from the Keeper of Public Records in accordance with the Disposal Standard.
5. Agreements must be made between the involved public offices and PROV for non-current records identified as being of permanent value to be transferred to PROV.
6. Where permanent records of the function have been previously transferred to PROV, the transferring public office must notify PROV of the change of responsibility for the transferred function.

## 8.1 WHEN DOES THIS APPLY?

This Principle and these Requirements apply to the occasions when a function is moved between Victorian public offices. This is often referred to as an administrative or Machinery of Government (MoG) change. For many areas of government, this occurs frequently and sometimes results in a name change for the organisation.

It also applies to situations where the Victorian government retains some control over the function. For example, the establishment of a Victorian State Owned Enterprise, a statutory authority or public-private partnership.

## 8.2 WHEN DOESN'T THIS APPLY?

This Principle and these Requirements do not apply to situations:

- where arrangements are made for functions to be performed on behalf of the public office, for a period of time, under a contractual arrangement or agreement – see *Operational Management Principle 5 Contracting*
- the function is permanently transferring outside the Victorian public sector – see *Strategic Management Principle 7 Transferring Functions Outside the Victorian Public Sector*.

## 8.3 WHAT IS REQUIRED

The records relating to the function(s) being transferred need to be identified. This includes those held in different systems, as online content and in storage, both digital and physical.

### CURRENT RECORDS

Current records are those which are regularly used by an organisation to perform its functions and operations. For example, a project file may:

- be created, amended and added to for two years while a project is being delivered; and
- continue to be regularly used for reporting and resolving issues for a further three years.

The records would be considered to be current for the entire five year period.

Current records must be transferred with the function and with the necessary associated metadata. This should be in an accessible and usable format, agreed to by all parties.

Duplicates of current records may be retained by the originating public office to meet future needs and obligations.

### NON-CURRENT RECORDS

Non-current records are those which are no longer needed by an organisation to perform its current functions and operations. They might still be needed occasionally, but this is not regular or anticipated. For example, they might be required for possible future Freedom of Information applications or legal proceedings.

Minimum required retention periods for non-current records must be identified so that appropriate arrangements can be made. Where there is no current RDA to apply to the records, disposal authorisation must be sought from the Keeper of Public Records.

The public office holding *permanent non-current records* must make arrangements to transfer them to PROV, prior to the transfer of function. This must be done in agreement with PROV and the public office which is taking responsibility for the function. This is usually the best time to obtain funding for this work to ensure the records are protected and will relieve the public offices of future work and overheads.

It may be that the involved public offices create and keep a small number of duplicates – but if duplicates of more than a very small proportion of the records are needed, *this means the records really aren't non-current!*

The public offices involved need to decide and agree on whether the *temporary value non-current records* will remain with the originating public office or move with the function.

Where permanent records of the function have been previously transferred to PROV, the transferring public office must notify PROV of the change of responsibility for the transferred function.

## 8.4 PLANNING AND PREPARATION

Victorian public offices should discuss arrangements with PROV and seek their advice during the planning phase.

It is critical that all of the relevant records are identified, including those held in different systems, published as online content or held in non-current storage - digital or physical.

In most cases, transferring current records will involve migrating records from one system to another, which may require converting records into different formats and mapping existing metadata to the fields in the system the records are being imported into. In many cases, external data migration expertise and services may be required for this.

Whether transferring original or duplicate records, care must be taken to ensure the full record and all of the required metadata is transferred. This is critical for ensuring that the records can be identified, retrieved and understood in the future. PROV's Metadata Specification may be of use.

If a Victorian public office is planning to digitise records for either their own use or to transfer to the other body, it is recommended that the PROV Digitisation Specification be used.

The involved public offices will need to determine the formats and methods for transferring the records. PROV's Long Term Sustainable Formats Specification may be of use.

Any privacy, confidentiality and security requirements need to be considered and addressed.

Resourcing and responsibility for the different aspects of the work need to be determined by the involved parties. Resourcing will be required for identifying, planning, preparing and migrating / relocating records, whether the transfer involves original records or duplicates.

The public office losing responsibility for the function must ensure permanent non-current records are transferred to PROV. This is for both digital and physical records.

## 8.5 FINALISATION

Ensuring that the full records, with required metadata, have been successfully transferred and are accessible and usable is crucial, irrespective of whether the transfer involves original records or duplicates. No destruction or system decommissioning should take place until successful transfer has been verified and these actions are authorised by the public offices involved.

The public offices involved must ensure they keep a record outlining, at a high level, the record collections transferred. This should include details of any arrangements made for enabling the public offices involved to access records if needed in the future.

The public offices involved must ensure that PROV is informed of any changes to functional responsibilities. This is particularly important in cases where permanent records have previously been transferred to PROV.

*Further direction and guidance can be found from other sources (e.g. websites of the Department of Treasury and Finance, Department of Premier and Cabinet and the Victorian Public Sector Commission).*

## Copyright Statement

© State of Victoria 2019



Except for any logos, emblems, and trade marks, this work is licensed under a Creative Commons Attribution 4.0 International license, to the extent that it is protected by copyright. Authorship of this work must be attributed to the Public Record Office Victoria. To view a copy of this license, visit <https://creativecommons.org/licenses/by/4.0/legalcode>

## Disclaimer

The State of Victoria gives no warranty that the information in this version is correct or complete, error free or contains no omissions. The State of Victoria shall not be liable for any loss howsoever caused whether due to negligence or otherwise arising from the use of this Standard