

Public Record Office Victoria
Standards and Policy

Recordkeeping Policy



Recordkeeping and the Environment: Issues Paper

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Acronyms

The following acronyms are used throughout this document.

DEPI	Department of Environment and Primary Industries
EMAS	Eco Management and Audit Scheme (European)
EMS	Environmental Management System
EPA	Environment Protection Authority
ICT	Information and Communication Technology
OH&S	Occupational Health and Safety
PROV	Public Record Office Victoria

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General

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Records Management Standards Application

The recordkeeping standards <http://prov.vic.gov.au/government/standards-and-policy> apply to all records in all formats, media or systems (including business systems). This issues paper identifies records management aspects that are specific to recordkeeping and the environment. Agencies are advised to conduct an independent assessment to determine what other records management requirements apply.

Responding to this Issues Paper

Please respond to those questions or aspects of the issues paper to which you may have particular views about. In your response please identify both the section of the issues paper and the question issue and paragraph to which you are responding. Additional ideas or comments on matters not addressed in the issues paper are welcomed. Please include them at the end of your response.

In responding to this issues paper, agencies should be aware that Public Record Office Victoria may be legally required to release the details of any response. If you have any concerns about information provided in your response, it is suggested that you seek legal advice.

Please email your responses to: Standards@prov.vic.gov.au.

The closing date for responding to the issues paper is: **6 February 2014**.

If you have any questions, please contact Alan Kong, Manager, Standards and Policy at alan.kong@prov.vic.gov.au or 03 9348 5720.

Executive Summary

The Victorian government has a strong focus on building and maintaining a sustainable environment. The Public Record Office Victoria (PROV) strongly supports this ongoing commitment and acknowledges the importance of the move towards achieving environmental sustainability across government.

The purpose of this issues paper is to assist with identifying and mitigating the environmental impacts associated with keeping records.

The issues paper offers the following observations about the environmental impacts of recordkeeping:

- Any means of creating, using, storing and disposing¹ of records will employ resources and have an impact on the environment.
- Environmental impacts of recordkeeping are cumulative and ongoing. For example, while both the digitised and paper formats co-exist when digitising records, environmental impacts continue to accrue for both formats.
- There are unique characteristics, risks and environmental costs associated with each record format. Their impacts on the environment are complex, interdependent and scale-dependent.
- Any assessment of the environmental impact of records will vary depending on how those records are created, used, preserved and disposed.
- The level of environmental impact on recordkeeping is also dependent on the efficiency of other business processes such as the procurement, training and business improvement strategies adopted within an agency.

The issues paper proposes two recommendations to help Victorian government agencies in dealing with environmental impacts when keeping records:

- Ensure records management and environmental strategies are aligned
- Apply best practice recordkeeping.

This issues paper invites comment from Victorian Government agencies, and local, national or international interested parties, in both public and private enterprise.

The consultation phase will conclude on **6 February 2014**.

Please send comments to standards@prov.vic.gov.au.

¹ Please note that the function of disposal includes both destruction and transfer activities.

1. Introduction

1 The Victorian government has a strong focus on building and maintaining a sustainable
2 environment. The Public Record Office Victoria (PROV) strongly supports this ongoing
3 commitment and acknowledges the importance of protecting the natural resource base
4 and the environment; in particular, the move towards achieving environmental
5 sustainability across the Victorian government.

6 Environmental sustainability requires the assessment and mitigation of the environmental
7 impact of an activity. The Australasian and International Standard on Environmental
8 Management Systems (*AS/NZS ISO 14001: 1996 Environmental management systems –*
9 *specification with guidance for use*) defines environmental impact as:

10 *‘Any change to the environment whether adverse or*
11 *beneficial, wholly or partially resulting from an organization’s*
12 *environmental aspects.’*

13 This issues paper:

- 14 • Briefly considers existing Victorian Government environmental policies
- 15 • Makes some suggestions when evaluating and quantifying environmental
16 impacts that are associated with keeping records
- 17 • Proposes some recommendations to assist an agency with the reduction of
18 environmental impacts when keeping records.

19 Please note that it is not the purpose of this issues paper to compare environmental
20 impacts between physical, digitised and born-digital record formats. Such a comparison
21 would involve extensive research and analysis and is dependent on measuring a number
22 of unknown variables which is beyond the scope of this issues paper.

23

Question 1 Do you agree with the definition of environmental impact used in
this paper?

24

2. Background

2.1. Government Policy Framework

25 To position Victoria as the world leader in achieving environmental sustainability requires
26 an ongoing commitment from all Victorians. As part of the environment portfolio,
27 Sustainability Victoria, Environment Protection Authority (EPA) and the Department of
28 Environment and Primary Industries (DEPI) are charged with the responsibility of
29 protecting our environment and achieving the objectives specified under the
30 Environmental Sustainability Framework.

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31 Established under the *Sustainability Victoria Act 2005*, Sustainability Victoria is one of the
32 leading Victorian agencies driving integrated waste management and resource efficiency
33 in Victoria. Sustainability Victoria works closely with DEPI, which provides the
34 overarching policy and governance. From an enforcement perspective, the EPA is the
35 administrative office that plays a critical role in regulating environmental impacts in
36 Victoria and acts as an independent authority to make regulatory decisions under the
37 *Environment Protection Act 1970* and other relevant legislation.

2.2. Records Management Programme

38 Heads of government agencies are responsible under section 13b of the *Public Records*
39 *Act 1973* for carrying out, with the advice and assistance of the Keeper, a programme of
40 efficient management of public records that is in accordance with all Standards issued by
41 the Keeper.

42 In Victoria, a programme of records management is identified as consisting of the
43 following components:

- 44 • A recordkeeping framework
- 45 • Recordkeeping procedures, processes and practices
- 46 • Records management systems and structures
- 47 • People and organisational structures
- 48 • Resources, including sufficient budget and facilities.

49 A programme of records management needs to cover all agency records in all formats,
50 media and systems, including business systems.

2.3. Environmental Management System

51 Measurement of environmental impacts within an organization is commonly an integral
52 part of corporate planning. In particular, environmental impacts are often accounted for
53 within an organization's overall Environmental Management System (EMS) or similar
54 systems (such as Occupational Health and Safety (OH&S) or quality systems).

55 An EMS model² is a tool used for managing environmental impacts of business
56 processes, from planning to implementation. This model has been adapted throughout
57 the world, including the European Eco Management and Audit Scheme (EMAS) and the
58 British Standard (BS7750). Almost all Victorian EMSs are based on the Australasian and
59 International standard *AS/NZS ISO 14001: 1996 Environmental management systems –*
60 *specification with guidance for use.*

61 The Victorian Government's EMS programme requires departments to have their EMS
62 (or equivalent systems) audited annually by an environmental auditor appointed under
63 the *Environment Protection Act 1970*. The Financial Reporting Direction 24C enables the
64 government to report on its environmental impacts in a consistent manner.

65 Alignment of agency records management with other key strategies, such as the annual
66 EMS audit, enables records management considerations to be included when preparing
67 for and providing reports (such as the Financial Reporting Direction 24C). Impacts or

² Refer to **Appendix 1** for a list of useful EMS related references including example of Environmental Policy and the 2003 Victorian EMS Model Manual.

68 risks related to records can then be determined and mitigated as part of the relevant
69 ongoing agency processes.

70 **3. Environmental impacts of recordkeeping**

71 Recordkeeping is a process that spans the life of a record. Agency records include those
72 in paper, born-digital or digitised formats.

73 To allow an agency to visualize and quantify environmental impacts associated with
74 recordkeeping, this issues paper proposes to break down recordkeeping activities into
75 four distinct stages:

- 76 • Creation (Stage One)
- 77 • Use at agency (Stage Two)
- 78 • Disposal (Stage Three)
- 79 • Use at an archive (Stage Four).

80 With this break down of activities, an Environment Impact Matrix³ is sketched (see 3.1,
81 below) using the Financial Reporting Direction 24C⁴ as a general guide.

82 The matrix enables a number of general observations to be made, five of which are
83 provided below. Agencies should consider these when assessing environmental impacts
84 of recordkeeping.

- 85 • Any means of creating, using and storing records will employ resources and
86 have an impact on the environment.
- 87 • Environmental impacts of recordkeeping are cumulative and ongoing. For
88 example, while both the digital and paper formats co-exist, environmental
89 impacts continue to accrue for both formats.
- 90 • There are unique characteristics, risks and environmental costs associated
91 with each record format (please refer to Appendix 3 for examples). Their
92 impacts on the environment are complex, interdependent and scale-
93 dependent.
- 94 • Linking with observation 3, any assessment of environmental impacts of
95 records will vary depending on how those records are created (e.g. the material
96 or fibre used, its origin and method of manufacture, and the format), used (e.g.
97 method and frequency), preserved (e.g. degradation of media and content
98 accessibility), or disposed (e.g. method of destruction or mode of transport and
99 method of storage).
- 100 • The level of environmental impact on recordkeeping is also dependent on the
101 efficiency of other business processes such as procurement, storage, training,
102 policy and business improvement strategies (e.g. such as those for Information
103 and Communication Technologies).

³ Please note this matrix should be used as a guide only, agencies should assess their own Environment Impact Matrix.

⁴ <http://www.dtf.vic.gov.au/CA25713E0002EF43/pages/bfm-financial-reporting-policy-financial-reporting-directions1>.

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104 In addition to the above observations, the matrix also highlights the need to capture
 105 activities outside and in-between these stages. For example, facilitative activities such as
 106 the printing of ephemeral copies from born-digital records for reading, or for use at
 107 meetings will increase environmental impacts.

108

Question 2: Do you agree with the above observations?

Question 3: Are there additional observations from your experiences?

109

3.1. Environmental Impacts Matrix

110

Stage	Paper Record	Digitised Record	Born-digital Record
Creation	<ul style="list-style-type: none"> • Use of paper (water, chemicals, energy, wood, transport in its creation) • Ink • Has environmental impacts of born-digital record if record was initially prepared on a computer, and also has the environmental impacts of the printing (energy, materials, transport, waste disposal) 	<ul style="list-style-type: none"> • Use of paper (water, chemicals, energy, wood, transport in its creation) • Ink • Computer and printer if record was created digitally (energy, materials, transport, waste disposal) • Scanner (including waste disposal) 	<ul style="list-style-type: none"> • Computer (energy, materials, transport and waste disposal)
Use at agency	<ul style="list-style-type: none"> • Production of duplicate (working) copies • Storage at agency or offsite facility (building materials and land, air-conditioning, other technology) • Storage consumables (folders, boxes) • Transport to and from offsite facility • Retrieval from storage • Additional resources to manage storage 	<ul style="list-style-type: none"> • Has environmental impacts of paper record while paper record is retained • Scanning (energy, materials, transport, and waste disposal) • Has environmental impacts of born-digital record once digital copy is created • Destruction of paper record 	<ul style="list-style-type: none"> • Printing of paper copies (e.g. for meetings, drafting) • Storage – if additional equipment required, then air-conditioning, space, other technology; retrieval; e-discovery, disposal of e-waste (such as computers), energy consumption per gigabyte stored, retrieved and uploaded • Networking impacts for transfer of digital copies • Records duplication
Disposal	<ul style="list-style-type: none"> • Destruction of temporary records • Transport to PROV of permanent records • Storage consumables if records need to be rehoused. (folders, boxes) 	<ul style="list-style-type: none"> • Has environmental impacts of born-digital record • Has environmental impacts of paper record if paper record is retained 	<ul style="list-style-type: none"> • Destruction of temporary records; disposal of e-waste • Transfer to PROV of permanent records

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Use at archive	<ul style="list-style-type: none"> Storage and access at archive (building materials and land, air-conditioning, lighting, maintenance, cleaning; replacement of facilities over long-term) Transport required for people to access record (public and government) Conservation Retrieval of records (use of lifts) 	<ul style="list-style-type: none"> Has environmental impacts of born-digital record Has environmental impacts of paper record if paper record is still held 	<ul style="list-style-type: none"> Storage at archive (storage systems, building materials and land, air-conditioning, lighting, maintenance, cleaning; replacement of facilities over long-term) Network access impacts Preservation or conversion to changing formats
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111

Question 4: Are these lifecycle stages the appropriate ones to use?

Question 5: What other lifecycle stages might be relevant or be considered?

Question 6: Are there other variables that should be considered?

112

113 4. Recommendations

114 This issues paper proposes two recommendations for agencies to evaluate and minimize
115 environmental impacts of recordkeeping:

- 116 • Recommendation 1: A holistic view: Alignment of records and other strategies
- 117 • Recommendation 2: Efficiency and building capacity: Application of best
118 practice records management.

119 These recommendations are interrelated and agencies are encouraged to factor in their
120 existing capabilities and corporate planning strategy when deciding which
121 recommendations are suitable.

122 4.1. Recommendation 1: A Holistic View

122 Aligning environmental and records management strategies will ensure that
123 environmental impacts of recordkeeping are, as appropriate, incorporated into existing
124 EMS or related systems, processes and reporting structures. This allows an agency to
125 view recordkeeping as a component of a broader information management framework
126 and provides an opportunity to assess all options/strategies available.

127 Agencies are required under section 2.2 of *PROS 10/10 S1 Strategic Management*
128 *Specification* to integrate records management strategies with other relevant strategies
129 across the agency, including environmental strategies. Implementing the Strategic
130 Management Specification may involve the use of Environmental Standards to determine
131 where records management and environmental management intersect.

132 For example, based on the Key Principles from *Environmental Standard (AS/NZS ISO*
133 *14001)*, agencies are encouraged to:

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- 134 • Ensure organisational environmental policies and objectives reflect
135 recordkeeping activities. Objectives should address paper and energy, water
136 consumption, greenhouse gas emission and waste generated in each
137 recordkeeping stage.
- 138 • Review recordkeeping activities that have a significant impact on the
139 environment. Ensure registers used include environmental aspects where
140 appropriate⁵.
- 141 • Identify significant environmental risks associated with records⁶.
- 142 • Identify any legal and corporate requirements for environmental performance
143 (there may be recordkeeping requirements to consider).
- 144 • Establish the capabilities and support mechanisms necessary to achieve
145 recordkeeping policy, objectives and targets. For example, ensuring that
146 business policies include recordkeeping and risk, or specifying how the
147 information and communications technologies (ICT) strategy will reduce the
148 environmental impact of records.
- 149 • Develop a monitoring and performance measurement framework based on
150 specified outcomes and key performance measures that includes non-
151 compliance and corrective actions associated with record management
- 152 • Undertake awareness and training programmes regarding the benefits of
153 improved records management practice with regard to the environment.

154 There are a number of government strategies that could assist an agency to reduce their
155 environmental recordkeeping footprints. For example, an agency could consider the
156 Victorian Government Purchasing Board's environmental procurement policy⁷ or the e-
157 Government strategy on ICT⁸.

158

Question 7: Do you agree with the examples identified above?

Question 8: Are there other ways an agency could ensure environmental impact of recordkeeping is appropriately captured in business processes?

159

4.2. Recommendation 2: Efficiency and Building Capacity

160 Applying sound recordkeeping practices will minimize environmental impacts associated
161 with recordkeeping. PROV Standards are designed to cover a programme of records

⁵ For suggestions on how to set up a register of environmental aspects and impacts visit <http://www.epa.vic.gov.au/about-us/environmental-performance/~media/Files/projects/Docs/Manual.pdf>.

⁶ When identifying environmental risks it is important to also identify transferred risks. For example, when storing records in cloud, environmental risks are not mitigated but are transferred from government agencies to the vendor.

⁷ For a set of Principles and Guidelines, please visit <http://www.procurement.vic.gov.au/CA2575BA0001417C/pages/procurement-practitioners-stage-1---planning-step-3---develop-the-procurement-strategy-environmental-procurement-policy>.

⁸ Visit here for a Better Practice Checklist <http://www.finance.gov.au/agimo-archive/better-practice-checklists/environmental-impact.html>.

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162 management, including strategic and operation management, from the creation and
163 capture of records through to their disposal. Through effective implementation of the
164 records management programme, efficiency is encouraged and resource use is
165 minimised.

166 For example:

- 167 • The creation and capture of records along with their relevant metadata and in
168 accordance with classification schemes means that information can be located
169 quickly. This reduces resource use associated with lost records such as the
170 need to duplicate information or to locate missing information.
- 171 • Active management of records (such as through a media refreshment
172 management programme), especially in an electronic environment, means that
173 information is accessed, read and understood throughout its retention period.
- 174 • When developing processes for the creation and capture of records, ensure
175 that the records are associated with the metadata required for agency business
176 needs to aid timely and accurate identification. This establishes confidence
177 among employees that they are working with the most current version of the
178 record (*PROS 11/07 S3 Capture Specification*).
- 179 • When developing a tender for an external storage facility for physical records,
180 include criteria stipulating that the facility that be located physically close to the
181 agency to minimise transport impacts.
- 182 • Disposal of records occurs once their retention period has ceased. This
183 minimises resources required to store and manage those records.
- 184 • To include in disposal contracts a clause to dispose technological waste (such
185 as discs, and tapes) in an appropriate manner.

186

Question 9: Do you agree with the examples identified above?

Question 10: Are there any other requirements in the PROV standards that you consider central to minimizing the environmental impact of recordkeeping?

187

188 **5. Appendix 1: Useful References**

189 Environmental Protection Authority

190 <http://www.epa.vic.gov.au/about-us/legislation/acts-administered-by-epa>

191 EPA Environment Policy

192 2003 Victoria EMS Model Manual

193 [http://www.epa.vic.gov.au/about-us/environmental-performance/environment-](http://www.epa.vic.gov.au/about-us/environmental-performance/environment-management-system)
194 [management-system](http://www.epa.vic.gov.au/about-us/environmental-performance/environment-management-system)

195 Sustainability Victoria's Environment Policy

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- 196 [http://www.sustainability.vic.gov.au/www/html/1337-our-environmental-management-](http://www.sustainability.vic.gov.au/www/html/1337-our-environmental-management-system.asp)
197 [system.asp](http://www.sustainability.vic.gov.au/www/html/1337-our-environmental-management-system.asp)
- 198 The Commissioner for Environmental Sustainability
- 199 <http://www.ces.vic.gov.au/>
- 200 Managing the environmental impact of information and communications technology (ICT)
- 201 [http://www.finance.gov.au/agimo-archive/better-practice-checklists/environmental-](http://www.finance.gov.au/agimo-archive/better-practice-checklists/environmental-impact.html)
202 [impact.html](http://www.finance.gov.au/agimo-archive/better-practice-checklists/environmental-impact.html)
- 203 SmartChoice Energy efficiency
- 204 [http://www.sustainability.vic.gov.au/www/html/3407-smarter-](http://www.sustainability.vic.gov.au/www/html/3407-smarter-choice.asp?intLocationID=3407#anchor3407)
205 [choice.asp?intLocationID=3407#anchor3407](http://www.sustainability.vic.gov.au/www/html/3407-smarter-choice.asp?intLocationID=3407#anchor3407)
- 206 Department of Treasury and Finance - Financial Reporting Directions 24 C
- 207 [http://www.dtf.vic.gov.au/CA25713E0002EF43/pages/bfm-financial-reporting-policy-](http://www.dtf.vic.gov.au/CA25713E0002EF43/pages/bfm-financial-reporting-policy-financial-reporting-directions1)
208 [financial-reporting-directions1](http://www.dtf.vic.gov.au/CA25713E0002EF43/pages/bfm-financial-reporting-policy-financial-reporting-directions1)

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