

## Recordkeeping Responsibilities and the IDES Service

### Background

A single whole-of-Government email and identity management platform, known as the Identity, Directory and Email Services (IDES) program has been developed by CITEC for implementation across State Government agencies. The email component of the program includes an email ‘archiving’<sup>1</sup> facility to ensure efficient, low cost storage management.

The use of the term ‘archiving’ by the IT industry can cause confusion between this storage solution and appropriate recordkeeping practices.

This advice outlines two key recordkeeping issues that agencies need to consider when signing up to the IDES service:

1. Emails must be managed as public records by the relevant creating and/or receiving public authority. Responsibility for this cannot be delegated to the IDES service.
2. The process of ‘journaling’, which is available via the IDES service, in which copies of deleted emails can be kept indefinitely, should not replace appropriate recordkeeping practices.

### Emails that are public records

Emails that document government business are public records and their management must be in accordance with the requirements of the *Public Records Act 2002* and *Information Standard 40: Recordkeeping*.

A transition to the IDES platform should not result in any change to existing recordkeeping responsibilities. Staff who send and receive emails are still responsible for:

- Identifying which emails are public records; and
- Incorporating these emails into the agency’s official recordkeeping system. This may include saving emails in an eDRMS or by printing and placing the emails onto a paper file, managed and classified in accordance with the public authority’s business classification scheme.

These recordkeeping processes ensure that emails are managed in context with related public records of other formats, and that all relevant staff have access to corporate information in accordance with approved access policies. Such recordkeeping processes also enable the retention and disposal of emails in accordance with *Information Standard 31: Retention and Disposal of Public Records* and the *Public Records Act 2002*, through the use of approved Retention and Disposal schedules.

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<sup>1</sup> For the IDES service, the term ‘archiving’ is used in the IT sense of storage. For information management and recordkeeping professions, the term ‘archiving’ means the ongoing management and preservation of records of permanent or long term retention value.

For more information on this issue, see Queensland State Archives *Managing Emails that are Public Records* policy and guideline.<sup>2</sup>

### Email management and 'journaling'

An email will usually be removed from storage in the email system when it is deleted by an end user. An end user may legitimately delete an email because:

- It is a public record and a copy has been placed into an official recordkeeping system (whether paper or eDRMS);
- It is an 'ephemeral' record, such as a duplicate copy of a record, a routine internal arrangement or other minor matter or its retention period has expired; or
- It does not relate to the business of the organisation. For example, a spam email or a personal message that is not a public record.

The IDES service is using email 'archive' technology as the storage platform. This technology also allows 'journaling'. This means that every email sent and received by every mailbox within the system will be captured and retained, **even if an end user has deleted it**. As outlined in Queensland State Archives' Public Records Brief, *Email Archiving Solutions alone do not achieve Recordkeeping Compliance*, 'journaling' is not recognised as an appropriate recordkeeping practice.<sup>3</sup>

Queensland State Archives recommends that journaling should only be implemented with the approval of Chief Executives. This is because it can present risks such as retaining duplicate copies of emails well beyond their recommended retention period, the confusion of storage platforms with formal recordkeeping controls, and breaching privacy if access is not strictly controlled. There can also be additional storage costs associated with journaling due to over-retention. It may be prudent for agencies to seek legal advice to ensure that any implementation of the IDES service and use of 'journaling' complies with legal and privacy requirements.

If the 'journaling' functionality is enabled for a public authority, appropriate internal policies and procedures should be developed to identify:

- The type of staff and the circumstances in which those staff can access the full journal of deleted emails, including any authorisation process and special conditions, if applicable.
- The period for retaining emails.

Note: As any public records held in the journal will be copies of those held in the official recordkeeping system, they can be legitimately disposed of as ephemeral records under section 6 of the *General Retention and Disposal Schedule for Administrative Records*.<sup>4</sup> However, if the 'journal' contains emails that are public records which have not been captured into the public authorities' recordkeeping system, these cannot be disposed of until the full authorised retention period has expired. Retention periods vary greatly depending on the content of the email. Please see your agency's authorised retention and disposal schedule for details of retention periods.

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<sup>2</sup> See [http://www.archives.qld.gov.au/downloads/emails\\_that\\_are\\_public\\_records\\_policy\\_and\\_guideline.pdf](http://www.archives.qld.gov.au/downloads/emails_that_are_public_records_policy_and_guideline.pdf)

<sup>3</sup> See [http://www.archives.qld.gov.au/publications/PublicRecordsBriefs/email\\_archiving\\_solutions.pdf](http://www.archives.qld.gov.au/publications/PublicRecordsBriefs/email_archiving_solutions.pdf)

<sup>4</sup> Available on Queensland State Archives website at <http://www.archives.qld.gov.au/government/disposal.asp>,