



Records of Information during easing of COVID-19 restrictions

Attn: Chief Information Officers, Information and Records Managers and Officers

The COVID-19 Pandemic is a significant event in world history and the Western Australian State and local governments' responses is likely to be of historical and research interest. Now that work places are returning to a 'new' normal and staff may be returning to the office, it is important that all relevant records of information are managed in line with the organisation's Recordkeeping Plan and retained and disposed of appropriately.

The SRO recommends that Chief Information Officers, and Records and Information Managers and officers consider:

- The need to assist organisational teams and individuals regarding:
 - Bringing records back into the office environment and process to official recordkeeping systems, including those records made on mobile devices or collaborative working environments such as SharePoint and social media.
 - Destroying duplicate records from personal storage devices such as laptops etc.
 - Determining duplication and version control of records of information,
 - Determining safekeeping procedures and protection of the privacy of personal information contained in Contact registers - see 'Attendance records / Contact registers' for more information, below.
- Reminding staff not to dispose of hard copy work related records (including copies) in the household rubbish bin and / or recycling bin.
- Updating Records and Information Management Policies and Procedures.

RETENTION OF RECORDS

State and local government organisations are undertaking and documenting a variety of activities relating to their unique business functions and administrative responsibilities in response to the COVID-19 outbreak. Records of information, including relevant data, related to the impacts of COVID-19 on agency business will be required as State archives and their retention must be in accordance with the relevant Retention and Disposal Authority.

The following list may be useful in determining what records are required to be retained as State archives as a consequence of COVID-19. Please note the list is not exhaustive.

Records Required as State Archives

- Plans, policies and procedures for the handling of COVID-19 incidents and cases
 - Organisation-wide strategic policies relating to COVID-19
 - Organisation-wide internal COVID-19 related plans and supporting procedures
 - Policies, procedures, and advice relating to information management practices for employees who are working from home as a consequence of COVID-19, including guidance for the creation, capture, control and security of data and information
- Committees, taskforces, working groups and other bodies formed to manage the agency's strategic response to COVID-19.
- Input to bodies formed to manage National and whole of sector COVID-19 responses.
- Organisation-wide risk management activities arising from COVID-19.



- Social media records relating to COVID-19 matters (sentence in accordance with the relevant Retention and Disposal Authority.) For further information see [Social Media Content as Government Records](#)
- Media releases relating to COVID-19 matters (master set).
- Any significant cyber security incident that utilised COVID-19 themed material to propagate an attack.
- Inquiries or inspections arising from an outbreak of COVID-19 in the workplace.
- Workplace incidents where employees or members of the public have tested positive to COVID-19.
- Records relating to compensation claims by employees and members of the public who contracted COVID-19 while on agency premises.

Please note: Organisations where COVID-19 responses form part of their core responsibilities, must take special care to ensure all relevant records of policies, input, programs, services etc. are captured and retained as State archives.

Records NOT required as State archives (Retain in accordance with the relevant Retention and Disposal Authority.)

- Purchase, allocation, distribution and/or installation of additional equipment, stores and services, obtained as a consequence of COVID-19, to protect the safety of staff and members of the public, such as the provision of products to enable workplace hygiene, personal protective equipment, protective screens and other alterations.
- Supply and provision of technology and telecommunications to enable staff required to work from home as a result of COVID-19, including implementing, configuring and modifying specific software-based technology solutions to support staff.
- Plans for, and provision of, a safe work environment and promotion of safe work practices (at home and workplace) to protect staff during a COVID-19 outbreak.

Attendance Records / Contact Registers

Registers containing private contact information of individuals, that were required when guests visited an organisation's facility. These registers were used for tracing purposes in case of COVID-19 exposure.

Attendance Records / Contact registers must be retained for 28 days *after the State of Emergency Directions expire*. For further information, see [COVID Safety Guidelines Phase 3](#)

As the registers contain private information, such as names and contact details of individuals, organisations '*must take reasonable steps to protect personal information it holds from misuse, interference and loss, and from unauthorised access, modification or disclosure*'. ([Australian Privacy Principles](#)). Procedures must be put in place for each facility collecting this data, to ensure the registers are secure.

When disposing of the Attendance registers, ensure they are done completely so that no information is retrievable. For further information, please see the SRO's Guideline [Records Retention and Disposal Instructions](#) – section 18 - Recommended Methods of Destruction.



Learning as a community of practice

The SRO recommends that records and information managers share their experience, including lessons learned, as widely as possible through existing networks. The SRO also invites organisations to share their experience with challenges and innovative approaches to the management of records of information during the response with the SRO via sro@sro.wa.gov.au. This information will be invaluable in developing more flexible standards and guidance for all government organisations.

Please make all relevant staff aware of this circular.

For **further information** and assistance please contact the SRO by email: sro@sro.wa.gov.au

Damian Shepherd
Director State Records
14 July 2020

Acknowledgement

- National Archives of Australia. [AFDA Express Version 2 Implementation Guideline: records relating to the COVID-19 Pandemic](#)
- Office of the Australian Information Commissioner. [Australian Privacy Principles](#)