



Recordkeeping Metadata Standard and Technical Specifications Exposure Drafts

Feedback Summary Report

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1 Introduction

This report provides a summary of key themes identified during the public exposure period on the Recordkeeping Metadata Standard and the accompanying Technical Specifications. This document summarises the results of the consultation. It contains the following:

- Information about the consultation process
- An analysis of submissions
- A discussion of the key issues raised by submissions
- A list of all organisations whose submissions were received.

1.1 Background to Standard

The Recordkeeping Metadata Standard will set out the minimum requirements for creating and managing recordkeeping metadata in electronic environments in accordance with the Public Records Act 2005 (PRA). It will be informed by ISO 23081 Parts 1 and 2, the international standard on recordkeeping metadata. The standard will be put forward for the e-Government Interoperability Framework (e-GIF).

Section 17 of the Public Records Act sets out the mandatory requirements for every public office to create and maintain full and accurate records in accordance with normal prudent business practice. These sections of the Act set out the requirements for two processes:

- Firstly, the making of complete and accurate records.
- Secondly, the maintenance and management of records over time.

The Recordkeeping Metadata Standard has been developed to ensure that full and accurate records of New Zealand state sector and local government business activity are managed effectively and continue to be useable over time.

It is envisaged the standard will be issued as mandatory under the PRA. Under the PRA the Chief Archivist can issue mandatory standards for central and local government.

The Recordkeeping Metadata Standard is accompanied by Technical Specifications that set out a recordkeeping metadata schema consisting of a reference set of metadata elements and encoding schemes. The metadata schema included in the Technical Specifications is a slightly modified version of the National Archives of Australia's *Australian Government Recordkeeping Metadata Standard* that has been tailored for use in the New Zealand environment. The Technical Specifications will not be mandatory under the PRA.

The standard is being developed for Archives New Zealand by Barbara Reed, Director, Recordkeeping Innovation Limited (technical author) and Kate Jones, Senior Advisor, Government Recordkeeping Archives New Zealand.

2 The Consultation Process

There was an eleven week period of consultation on the exposure drafts, from 12 November 2007 to 25 January 2008. Archives New Zealand consulted in the following ways:

- Designed a PDF feedback form and dynamic RTF version to ensure submissions were able to be analysed and understood more easily.
- A web page was created for the exposure draft project, with information about the review and links to the online version of the standard and feedback form.
- The Chief Archivist wrote to the Chief Executive of every public office and local authority to tell them about the review and request submissions.
- The project manager wrote to the presidents of professional associations within New Zealand to tell them about the review and request submissions.
- Messages announcing the consultation were posted on the NZ-Records, GOVIS and RMAA email list-servers.
- An email was sent to local government archives and records managers via ALGIM and LGNZ list-servers.
- Notification of the exposure period was placed on the Public Service Intranet (PSI).
- The project manager gave a presentation on the exposure drafts at the Archives New Zealand Recordkeeping Forum in Christchurch on 23 November. This was attended by approximately 40 people.
- The project manager gave a presentation on the exposure drafts to the eDRMS Interest Group in Wellington on the 7th December. This was attended by approximately fifty people.
- The technical author and project manager gave a presentation on the exposure drafts in Auckland on the 11th of December. This was attended by approximately twenty people.
- The technical author and project manager gave two presentations on the exposure drafts in Wellington on the 12th of December. This was attended by approximately forty people.
- Two briefing sessions were convened for a targeted group of CIO's and senior managers in Wellington on the 23rd of January. The focus groups attracted approximately twenty people.
- The Government Recordkeeping Programme met with representatives from several Public Offices to discuss the exposure drafts.
- The project manager met with audit firms to discuss the exposure draft.
- The project manager contacted and met with vendors of information management solutions to facilitate feedback on the standard and technical specifications.

3 Analysis of Submissions

Eighty submissions were received from seventy different organisations. Sixteen of the submissions were directed specifically at the Technical Specifications. Submissions varied in length and substance. Some gave only minimal feedback using the form provided. Others provided very detailed suggestions for improvements. There were many substantial submissions, demonstrating a high level of engagement with the process.

The table below summarises the major types of organisation which were contacted and how many of them responded:

Type of organisation	Number contacted	Submissions	Percentage of total submissions
Public Offices	203	49 (NB: 3 subs related jointly to Std &TS)	61%
Local Authorities	85	13	16%
Professional Associations	6	2	3%
Individuals	N/A	5	8%
Other (includes vendors)	N/A	11 (NB: 2 subs related jointly on Std &TS)	14%

3.1 Feedback Sheet Questions

The feedback sheet had three initial questions rated 1 – 5, 1 being agree and 5 being disagree. The questions respondents were asked to tick on of the boxes were;

General Feedback: Please Evaluate the Standard against its Goals	agree		disagree		
	1	2	3	4	5
The Standard/Technical Specifications will support and improve government recordkeeping in New Zealand.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The Standard/ Technical Specifications clearly specifies minimum requirements for the creation and maintenance of metadata for electronic records the Public Records Act.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The Standard/ Technical Specifications will enable organisations to incorporate metadata into electronic systems managing and creating records.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Analysis of results for Recordkeeping Metadata Standard

		Agree			Disagree	
	Total responses	1	2	3	4	5
Question 1	54	22	16	13	0	1
	%	40	30	24	0	2
Question 2	54	18	17	12	4	1
	%	33	32	22	7	2
Question 3	54	14	14	16	9	1
	%	26	26	30	17	2

The results indicate that half of the respondents believe the standard is fit for purpose with 52% or more of all respondents agreeing (rating 1 or 2) with each of the three statements. This provides a mandate to continue with the standard in its present form. However, the relatively high number of neutral responses (rating 3) and disagree responses (rating 4-5), ranging from 26% in Q1, 31% Q2 and 49% of Q3, indicates that this agreement is not overwhelming. In fact, the high number of neutral responses may indicate confusion and a lack of understanding of the standard.

Analysis of results for Technical Specifications

		Agree			Disagree	
	Total responses	1	2	3	4	5
Question 1	14	7	5	2		
	%	50	36	14		
Question 2	14	6	3	3	1	1
	%	43	21	21	7	7
Question 3	14	3	6	4	1	
	%	36	50	29	7	

The results indicate that the majority of respondents believe the Technical Specifications will support and improve government recordkeeping and aid in the management of electronic records. Again the relatively high number of neutral

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responses (rating 3) may indicate confusion and a lack of understanding of the Technical Specifications.

3.2 Key Issues Raised in Submissions

While many of the submissions considered that the standard and Technical Specifications were robust, and did not need significant revision, others made suggestion for improvement and clarification. Below are the most significant themes to emerge from the submissions. These are the key issues that the Advisory Group considered when redrafting the standard and accompanying Technical Specifications.

3.2.1 Recordkeeping Metadata Standard

○ Status of Standard – Lead in Period

Most submissions were supportive of a mandatory standard for recordkeeping metadata. However, several submissions indicated the technical subject matter of the standard presented significant implementation challenges. These submissions suggested that the standard be made discretionary for a lead-in period prior to it becoming mandatory.

The Advisory Group noted that full compliance with the standard was not expected until 1 July 2010 already allowing a two year lead-in period. On these grounds it was determined the existing lead-in period in the standard was sufficient as it was consistent with the compliance lead-in period outlined in the Storage Standard.

○ Status of Standard - Application to Business Systems

Submissions from several large public offices raised concerns about the application of the standard to existing business systems. These submissions highlighted the cost implications of retrofitting existing systems to enable application of metadata from 2010 onwards. These submissions requested the standard only apply to business systems implemented after 2010.

The Advisory Group considered these comments and recommended the application of the standard to existing business systems was altered in response. The Advisory Group determined that while the standard applied to all electronic records created from 1 July 2010, those records created in legacy business systems (defined as business applications operational before the standard was issued in 2008) are not expected to be persistently linked with recordkeeping metadata until the business system that created the records is fundamentally redeveloped or has significant functionality added. The group also indicated that the future focused application of the standard should be clarified to ensure users are aware the standard does not apply to records created before 1 July 2010.

○ Application to Electronic Records

Many submissions noted that recordkeeping metadata applies equally to records in a physical format and suggested extending the scope of the standard to cover physical records.

The Advisory Group acknowledged the role of recordkeeping metadata in the management of physical records but noted that the driver for the standard was the need to explicitly manage recordkeeping metadata associated with digital records. The group felt unable to appropriately address digital requirements in a standard that addressed both physical and electronic formats. The group recommended changing the name of the standard to, 'Electronic Recordkeeping Metadata Standard' to reflect its core focus.

○ **Relationship with Technical Specifications**

Many submissions requested the creation of greater linkages between the standard and the Technical Specifications. This request was particularly evident in relation to Requirements 8 and 9 which identify the minimum recordkeeping metadata required for compliance. Submissions also noted the differing use of the word 'mandatory' in the standard and the Technical specifications. Respondents questioned why a best practice Technical Standard had mandatory elements within it.

The Advisory Group recommended creating links between the standard and Technical Specifications. In particular, the group recommended that the relevant elements from the Technical Specifications were identified as a possible way of meeting the minimum requirements outlined in Requirement 8 and 9. The group also recommended that the discretionary nature of the Technical Specifications was further emphasised.

○ **Terminology and Structure**

Several submissions noted that the 'Examples of Risk' column in the Requirements table was not particularly useful. The risks were viewed as being too generic and high level to be helpful. Several submissions noted that the addition of clear auditable examples would be of more value.

Some terminology in the standard proved problematic and it was noted some key terms would benefit from further explanation. The minimisation of records specific jargon and the inclusion of a more comprehensible glossary were recurrent themes.

The Advisory Group recommended removing the 'Examples of Risk' column from the Requirements table and addressing risks separately in a 'risks and benefits' section. The group also advised undertaking an external plain English edit of the standard to improve readability.

The group rejected adding auditable examples to the standard on advice from the project manager that examples of audit measures would be produced in a separate tool as part of the PRA Audit Strategy.

○ **Guidance Documents**

Several submissions noted the need for additional implementation advice. Positive mention of the Guide to Recordkeeping Metadata in EDRMS was made but there was disappointment that the guide was not available to elaborate on the standard. Guidance on implementation of recordkeeping metadata in shared drive environments and on metadata mapping was requested.

The Advisory Group acknowledged these comments and recommended the development of the following additional implementation products:

- Guide to implementing recordkeeping metadata in shared drives
- Training courses on standard and Technical Specifications
- Metadata crosswalks (mapping) guidance
- UML modelling and XML schema
- Implementation case studies

○ **Disposal and Appraisal Requirements**

A significant number of comments were received relating to the disposal and appraisal requirements within the standard (Requirements 13-15). These comments focused on the practicalities of scheduling the disposal of recordkeeping metadata as separate from the disposal of the record object. In particular, Requirement 15 and the retention of minimum recordkeeping metadata elements after disposal of a record raised comment. Several submissions queried the retention period of 'life of the system' noting this was arbitrary and difficult to define.

The Advisory Group indicated that the general expectation behind Requirements 13-15 is that recordkeeping metadata will be retained for at least as long as the record object. Under normal circumstances the authority to dispose of a class of records will encompass the disposal of the records' associated recordkeeping metadata. However, in circumstances where this general expectation does not apply and there is a business need to dispose of recordkeeping metadata separately from the record object then the action must be independently documented through the Archives New Zealand appraisal and disposal process. The group recommended clarifying these expectations with the Appraisal section at Archives New Zealand to ensure consistent communication to stakeholders.

The group also revised the retention period in Requirement 15 and recommended it be changed to 'must be retained for as long as required by the business'. The group recommended this retention period to reflect the fact that the retention of minimum metadata following the disposal of a record object is a risk based decision that must be made by individual public offices and local authorities.

○ **Mapping of Business Critical Systems to Schema**

Several submissions requested clarification of Requirement 5, specifically around the definition of a 'business critical system' and against which recordkeeping metadata schema the systems were to be mapped.

The Advisory Group recommended the clarification of the definition of business system in the glossary but determined that the standard was unable to define 'critical' as this depended on the importance of an individual system to an organisation. The group recommended stating that each organisation must identify its own critical business systems based on risk analysis.

The group also recommended clarifying the requirement to indicate that the mapping is to occur between the critical business system and the recordkeeping metadata schema in the Technical Specifications.

○ **Metadata Minimums**

The minimum point of capture metadata identified in Requirement 8 generated a significant number of comments. Several submissions suggested elaborating on the element 'who created the record' by specifying the roles of 'author' and 'creator' and clarifying the metadata minimum 'what business is being conducted'. Respondents also requested relating the metadata minimums in the requirement to the metadata schema in the Technical Specifications.

The group recommended the expansion of the explanation in Requirement 8 to clarify the intent of each minimum and identify the elements of the recordkeeping metadata schema within the Technical Specifications that could be used to meet the requirement. The group also recommended the explanation indicate how organisations might take these minimums from the properties elements or network directory structures in common office software.

3.2.2 Technical Specifications

Please note the feedback received by Archives New Zealand on the Technical Specifications was pooled with that received by the National Archives of Australia on the *Australian Government Recordkeeping Metadata Standard*. As the recordkeeping metadata schema in the Technical Specifications is being developed for use across both the New Zealand and Australian government jurisdictions, a collaborative response to feedback was undertaken.

The following major themes were identified in submissions made on the Technical Specifications.

○ **Changes to Elements**

The following elements are those that received significant comment from both New Zealand and Australian stakeholders.

1. Keyword
2. Security Classification and Security Caveat
3. Security Clearance
4. Format
5. Extent
6. Relation and Event History
7. Change History

The Advisory Group recommended Archives New Zealand approve alterations to the above elements based upon the redrafting devised by the technical author and National Archives of Australia.

○ **Security Classification and Security Caveats**

It was noted the terms Security Classification and Security Caveat have specific meanings in the New Zealand security community. This presents difficulties when using a generalised metadata schema across multiple jurisdictions. It was recommended that the schema is checked for consistency against the *Security in the Government Sector (SIGs)* manual to ensure configuration of the Security Classification and Security Caveat properties to suit the New Zealand jurisdiction.

The Advisory Group recommended Archives New Zealand approve the implementation devised by technical author and National Archives of Australia.

○ **Technical Subject Matter**

While submissions on the Technical Specifications indicated that they were clear and useful, several others indicated they had difficulty comprehending the concepts outlined inside and requested further elaboration and the inclusion of a glossary.

The Advisory Group noted the technical nature of the document and recommended making the content less dense where possible. The group, however, noted the purpose of the document and were reluctant to add greatly to its length by adding explanatory text that would be more appropriately found elsewhere. To this end, the group recommended the Technical Specifications more closely reference the glossary in the Recordkeeping Metadata Standard and supplementary supporting documents where available. The group also recommended that Archives New Zealand clearly communicate the technical nature of the document to stakeholders and ensure it is directed at the appropriate audience.

○ **Preservation Metadata**

Several submissions noted that the schema in the Technical Specifications did not specifically address preservation metadata. It was suggested the Technical Specifications incorporate preservation metadata requirements and include a mapping to the PREMIS Data Dictionary for Preservation Metadata.

The Advisory Group recommended the inclusion of a mapping to the PREMIS metadata schema.

4 Next steps

The standard and Technical Specifications have been revised based on the recommendations of the Advisory Group. The revised standard has been reviewed by the Advisory Group and is currently awaiting approval by the Chief Archivist. Upon approval the standard will be issued under section 27 of the Public Records Act 2005. The accompanying Technical Specifications will also be issued under the PRA in a discretionary capacity.

Appendix: Full List of Submissions Received

Public Offices

1. ACC
2. Alcohol Advisory Council of New Zealand
3. Archives New Zealand
4. Auckland University of Technology (2 submissions on standard)
5. Broadcasting Commission
6. Crown Health Financing Agency
7. Crown Law
8. Department of Building and Housing (1 submission on standard, 1 submission on TS)
9. Department of Labour
10. Education Review Office
11. Government Communications Security Bureau
12. Government Superannuation Fund
13. Guardians of New Zealand Superannuation
14. Housing New Zealand Corporation (1 submission on standard, 1 submission on TS)
15. Inland Revenue Department
16. Lincoln University
17. Massey University (1 submission on standard, 1 submission on TS)
18. Mental Health Commission
19. MidCentral District Health Board
20. Ministry for the Environment
21. Ministry of Economic Development (2 submissions on standard)
22. Ministry of Foreign Affairs and Trade
23. Ministry of Social Development
24. New Zealand Customs Service
25. New Zealand Defence Force
26. Office of the Clerk and the House of Representatives
27. Pacific Cooperation Foundation
28. Research and Education in Advanced Network New Zealand Ltd.
29. State Services Commission
30. Statistics New Zealand
31. Takeovers Panel
32. Te Puni Kokiri
33. Telford Rural Polytechnic

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34. Tertiary Education Commission
35. The Open Polytechnic of New Zealand
36. The Treasury (2 submissions)
37. Transit New Zealand (1 submission on standard, 1 submission on TS)
38. Unitech New Zealand
39. University of Auckland
40. University of Canterbury
41. Victoria University of Wellington
42. Waiariki Institute of Technology

Local Authorities

1. Auckland City Council
2. Bay of Plenty Polytechnic
3. Central Hawke's Bay District Council (2 submissions on standard)
4. Central Otago District Council
5. Chatham Islands Council
6. Environment Waikato
7. Far North District Council
8. Franklin District Council
9. Hamilton City Council
10. Horizons Regional Council
11. Hutt City Council (1 submission on standard, 1 submission on TS)
12. Wellington City Council

Other

1. ARANZ (Archives and Records Association of New Zealand) (1 submission on standard, 1 submission on TS)
2. Converga Party Limited
3. EDS New Zealand
4. Gemtech Solutions
5. InfocentriK Limited
6. Janita Stuart (1 submission on standard, 1 submission on TS)
7. Jean Cavaney
8. KPMG
9. Microsoft New Zealand Ltd

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10. Objective Corporation

11. Patrick Power

12. Paula Smith

13. State Records New South Wales (1 submission on standard, 1 submission on TS)

14. SWIM Limited

15. TME Digital Signature