

Public Record Office Victoria

Recordkeeping Policy

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APPROVAL PROCESSES

1. Application

The Keeper of Public Records has approved a recordkeeping policy for approval processes. Public offices should apply its terms in line with the *PROV Value and Risk Policy*¹ to relevant recordkeeping decisions and practices.

2. Policy

It is Public Record Office Victoria's (PROV) position that:

1. All approval processes should be digital by design where possible, so that recordkeeping requirements are incorporated within the technology used.
2. Full and accurate records of the approval process and approval should be created, captured, kept for the duration of their retention periods, and document the following:
 - a. the legislative requirement in cases where the law requires specific people or positions to provide authorisation or approval
 - b. the level of authority, knowledge, and responsibility, where the approver must hold a specific level
 - c. the details of the approval, including (at a minimum):
 - i. the metadata set documented in *PROS 19/05 Specification 2 Minimum Metadata Requirements*
 - ii. where practical or required, a metadata field, such as a label or protective markings, which denote a record's level of public access or restriction
 - iii. the trigger for the approval completion, with associated metadata to include the name of the approver, their position or role, and the date and time of approval for each approval point
 - iv. any authorised changes to the approval, with associated metadata to include the name of the person who authorised the change, their position or role, the date and time of the change, and whether the approval is current or superseded/rescinded.
3. Approval processes should be appropriately governed to demonstrate integrity and accountability, with documentation to include:
 - a. the level of governance required for the approval, with details based on an assessment of:

¹ PROV Recordkeeping Policy: A value and risk-based approach to records management, available via PROV's website <https://prov.vic.gov.au/recordkeeping-government/document-library/value-risk-policy>

- i. how critical the actions or decisions being approved are to the business, to government, to stakeholders and to the community
- ii. the associated risks or possible impacts for each approval process
- b. the checks and balances in place to:
 - i. prevent inappropriate or unlawful actions or decisions, especially those that would result in harm
 - ii. maintain the integrity of the approval record for the duration of its retention period
 - iii. protect any security, privacy or sensitivity requirements regarding information held
 - iv. provide transparency regarding the approval and the approval process.
- c. Where automation or machine learning is used to make decisions as part of an approval process documentation should cover:
 - i. the points at which an approval decision or action should be undertaken by a human being, including how this is determined, justified, and designed into the approval process
 - ii. details regarding a program of regular monitoring and auditing of the automated process by a human being, including how this is designed, documented, and implemented.

3. Background

PROV developed this policy to address the increasing complexity of creating and managing full and accurate records of approvals processes due to the wide range of technical solutions and the increasing use of automation and machine learning.

4. Appendix

PROV Value and Risk Policy (<https://prov.vic.gov.au/recordkeeping-government/document-library/value-risk-policy>)

PROV Recordkeeping Standards (<https://prov.vic.gov.au/recordkeeping-government/standards-framework>)

Electronic Approvals Topic page (<https://prov.vic.gov.au/recordkeeping-government/a-z-topics/electronic-approvals>)

Record Keeping Assessment Tool (RKAT) (<https://prov.vic.gov.au/recordkeeping-government/learning-resources-tools/rkat>)

Freedom of Information Practice Notes (including informal release, proactive release, and guidance on Part II of the FOI Act) provided by the Office of the Victorian Information Commissioner (<https://ovic.vic.gov.au/freedom-of-information/practice-notes/>)

Victorian Information Privacy Principles guidance provided by the Office of the Victorian Information Commissioner (<https://ovic.vic.gov.au/privacy/guidelines-to-the-information-privacy-principles/>)

Victorian Protective Security Framework and Standards provided by the Office of the Victorian Information Commissioner (<https://ovic.vic.gov.au/data-protection/information-security-resources/>)

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