Records Management Roadmap

2026

Division of Information Technology

Contents

1. Context

An internal audit conducted in 2024 made multiple observations relating to records management. A subset of those records related findings were subsequently bundled into item 549 in the Enterprise Action Register (EAR) for addressing.

The EAR made the observation for the need of a:

"… comprehensive, measurable and actionable [set of actions], with clear assignments and timelines".

This Records Management Plan 2026 is intended to address this observation.

2. Purpose

The purpose of the Records Management Roadmap is to provide a central document to define and communicate:

- **WHAT** activities and changes to be made across the records management capability in 2026.
- **WHY** those activities are important.
- **HOW** those activities will be achieved.
- **WHEN** they plan to be achieved; and
- **WHO** is responsible for their delivery.

3. Goals

The goals of the 2026 Records Management Roadmap are as follows. The goals represent **why** the Roadmap activities are needed.

	Increase Efficiency	Reduce the effort required for records compliance related activity through process and data improvements.
	Centralise Governance and Data	Streamline governance through centralisation of core data and record governance elements.
	Continued compliance	Continued alignment and compliance with requisite legislation and internal policy / procedural requirements.
	Improved Awareness	Improve awareness of records management requirements and obligations
	Uplift technology	Uplift technology functionality to support new capability and improved workflows.

4. Strategy

The following 2024 audit observation was noted as part of resulting EAR 549:

> *… there is a lack of clear direction in relation to the approved records management system to be used across the University*

The findings went on to note that it is not clear "what the future operating model" (for records management) will be and, specifically, it was not clear whether a single source or multiple approved systems approach is / would be adopted. This "strategy" section is intended to address these questions.

The University adopts a risk-based, hybrid approach to managing electronic records, that combines the manage-in-place approach with the centralised-repository approach. This hybrid models is labelled the "least movement strategy" for convenience.

Fundamentally, the strategy guides stakeholders to keep records in the system in which they were created where possible (manage-in place). It is considered possible when the source system either has the required records controls or the appropriate manual mitigations can be made to address any gaps. Where it is not possible to keep records in the source system they must be kept in the central records management system. The strategy is summarised in the following diagram.
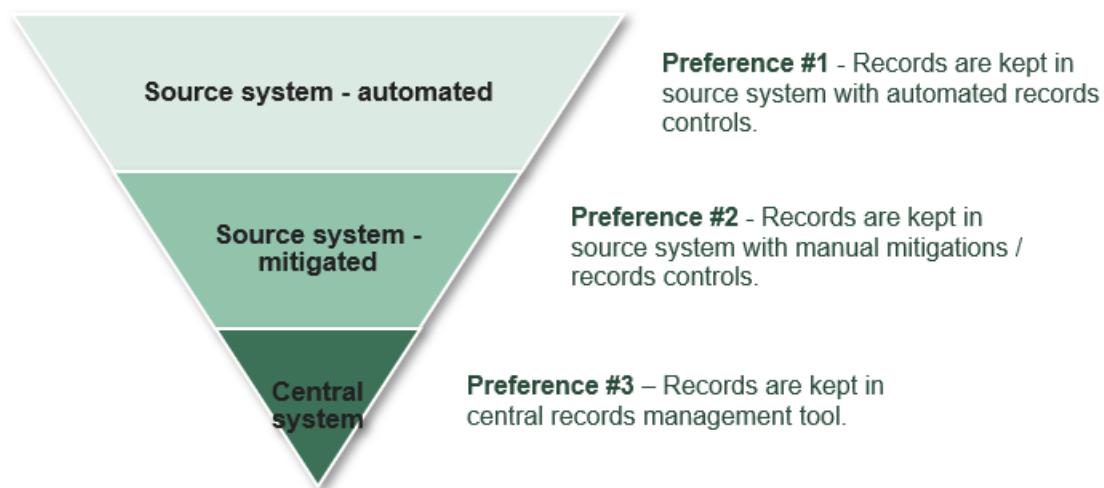
Figure 1 - Least movement strategy

The strategy is based on the following assumptions / assertions:

- Less duplication / migration of information between systems reduces risk, minimizes the security footprint and reduces costs.
- It's typically more convenient for users to manage records in their source system. Increased convenience helps drive adoption which helps drive improved compliance.
- Source systems often have data associated to a record that can be useful in understanding context and meaning.
- Some systems will have controls that are not, in themselves, sufficiently compliant but which can be made so with minor manual mitigations (for example, periodic disposal of old records).
- Risk assessments should balance accessibility and usability of the information with factors such as security and retention requirements.

The set of ordered preferences acknowledges that the choices for records handling exist on a nuanced spectrum and that each system / situation will have slightly different considerations and constraints.

5. Principles

In the context of this Roadmap principles are defined as a set of rules to guide decision making. Principles provide guidance when multiple design or implementation decisions are possible by indicating options and approaches that are more (or less) aligned with the preferred ways of working for the organisation.

	Simplicity	Prefer simplicity over complexity.	Make it as easy as possible to understand how to "play by the rules".
	Consistency	Prefer consistency and repeatability over variability.	Make adherence easier by making it predictable and universal.
	Accessibility	Prefer ready direct access to records over indirect	Make it as easy as possible for appropriately authorised people to access records themselves.
	Efficiency	Prefer less effort over more effort.	Make compliance require as little effort as possible.

6. Roadmap

The roadmap provides a high-level summary of **when** activities are planned for 2026. The Activities section (see below) then unpacks **what** each of the activities is seeking to accomplish and **who** has carriage of it.

		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Processes & Data													
PD01	High Risk / High Value records criteria refinement	▓	▓	▓	▓								
PD02	Enterprise Data Catalogue refinement					▓	▓	▓					
PD03	Records naming guide					▓	▓	▓					
PD04	CRM records uplift	▓	▓	▓	▓	▓	▓	▓					
Governance													
G01	Data Governance integration	▓	▓										
Technology													
T01	Microsoft Purview pilot	▓	▓	▓	▓	▓	▓	▓					
T02	Microsoft SharePoint Communications Hub				▓	▓							
T03	BDMS replacement[1]	▓	▓	▓	▓	▓	▓	▓	▓	▓	▓	▓	▓
T04	Open Text Content Manager licensing				▓	▓							

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[1] As the records related element is realised during the full implementation this timeline represents the duration of the SMTP project, not just the records component thereof.

7. Activities

PD01 – Refine High Risk / High Value Records Criteria Refinement

The University has compliance obligations to identify and document its high risk/high value records and effective execution of the "least movement" strategy depends on refinement of the criteria used to define these.

The university Records Management Policy notes that:

> *Records management processes and arrangement are proportionate to the business value and risks associated with the record or information … records identified as high risk and high value be prioritised*

The policy then goes onto define high risk / high value (HRHV) records as being determined by four primary characteristics:

1. Support for high or very high-risk processes or functions.
2. Demonstrate the performance of university principal functions.
3. Hold high risk health or personally identifiable information.
4. Required for long term (50+ years) or State archive retention.

While these criteria are linguistically simple and logical, they are practically difficult to employ. For example, identification of high-risk processes requires that a list of processes be available. At present no such list exists. Similarly, it can be difficult to define the specific records that demonstrate performance of the principal university functions under the Charles Sturt University Act.

The HRHV criteria directly impacts ability to identify which data assets qualify as HRHV records. To date, manual and subjective approaches have been used to apply the characteristics 1-3 above to identify these assets.

The PD01 activity will refine the HRHV criteria to enable simpler, consistent and repeatable assessment and through that, to ultimately drive increased ability to identify where the "least movement" strategy will need to be employed.

This activity will be driven by the Enterprise Architecture team with the Associate Director, Enterprise Architecture assuming responsibility for delivery. Execution will occur in H1 2026.

PD02 – Enterprise Data Catalogue Refinement

The identification of HRHV records relies on having a definitive view of the data assets of the university. NSW legislation requires the University to maintain an information asset register identifying its HRHV information, and, historically, several different data registers / catalogues / inventories have existed. While

there was significant overlap between them, there were also some differences (e.g. asset naming, asset specificity, etc.). Those differences lead to lack of clarity and confusion over what risks exist.

The Enterprise Data Catalogue (EDC) / Enterprise Data Model (EDM)[2] is the enterprise source of truth for the university's "data inventory". During 2024 the university adopted a new Data Governance Framework. The operationalisation of that framework in 2025 has seen appointment of a Manager, Data Governance. A key activity of that role is the refinement of the "version 3.0" of the EDC.

The work to refine the EDC includes incorporating of additional metadata attributes including:

- Identification of HRHV records.
- Capturing of minimum records retention requirements (e.g. number of years) as well as the applicable authority numbers driving those requirements.
- Capturing measures of data criticality.

These additional attributes will provide significant value in better understanding university data and records.

Refinement of the EDC is the responsibility of the Associate Director, Enterprise Architecture and Manager, Data Governance (see G01). Initial work will occur in Q4 of 2025 with subsequent iterative development occurring in H1 2026.

PD03 – Records Naming Guide

The "finding (root cause)" of EAR549 made the following observation:

> *whilst the naming convention guidance document for … HPE Content Manager is clear, the internal audit team was not able to sight similar documentation for any other approved records management systems*

The PD03 activity aims to define a set of general records naming conventions that can provide guidance applicable to any approved records management system.

The Manager, Policy and Records will be responsible for delivery of this activity. Timing will depend on priorities but is scheduled for late Q2 2026.

PD04 – CRM Records Uplift

This activity will establish data retention and deletion policies for the Dynamics 365 CRM system to ensure compliance with university records management requirements and General Disposal Authorities (GDAs).

The CRM retention policies have been developed through consultation with key stakeholders including the Records Management team, the university Ombudsman, and business stakeholders (to define team-specific retention requirements).

The goal of the retention policies is to align CRM data practices with the University's records management position:

> *Records and information should be destroyed once the minimum retention period is met, unless:*
>
> - *the information custodian or relevant authority of Band 6 or above approves a longer retention for a clearly identified business purpose or valid historical or research purpose, in consultation with the University Ombudsman where required, or*

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[2] The EDC is the list of data assets and associated metadata while the EDM is visual representation of the EDC.

> - *a direction is issued from any court or tribunal, statutory body, commission or governing agency to retain for longer.*

Implementation of the policy controls will occur in two phases:

1. **Initial Data Clean** - Review and deletion/classification of existing CRM records based on established retention rules
2. **Ongoing Automation** - Setup of regular automated jobs to continuously manage data retention and deletion

Actions for 2025

- Developed a definition of records that fall under general disposal authorities.
- Developed a definition of data that falls under normal administrative practices.
- Identified and isolated records that fall under confidential areas or records that require extended retention and further definition.
- Developed retention rules for the defined records through consultation.
- Defined rules for retention or removal of non-record related entities and activities created in the CRM.
- Identified data for immediate removal from the CRM.
- Created processes for tagging records for removal as defined by the retention rules.
- Created processes for removal of tagged records.
- Created processes for removal of non-record related data.

Actions for 2026

- Monitoring and refinement of automated record removal processes.
- Develop responses for confidential record management.
- Investigate additional CRM controls to support full in-tool records management.

G01 - Data Governance Framework operationalisation

The university approved a new Data Governance Framework during 2025. The Framework defines the key elements for how data governance will function at the university going forward, including:

- **Principles** – to guide data governance decision making.
- **Data Lifecycle** – to provide consistent terminology for the phases of data management.
- **Operating Model** – a tiered structure showing the different groups involved, their responsibilities and their relationship to existing governance / committees.

The primary operational tier of the framework governance is the Data Advisory Group (DAG). The core responsibilities of the DAG include:

- Developing policies, procedures, and standards that ensure the quality, integrity, and security of the university's data.
- Developing proposals for data related initiatives.
- Advising on data governance related issues and risks.
- Reporting on key metrics associated with the university data landscape.
- Liaising with the business to understand data needs, issues, and opportunities.

- Communication and promotion of data governance practices and requirements.
- Receiving ideas and requests for data improvement from staff.

Incorporating records management related obligations, issues, and concerns into the core data governance operating model will be a key responsibility of the DAG going forward. The DAG will provide not only a forum for additional records related governance but will also help drive integration of records data, policies and procedures into the broader data governance landscape. The development of the refined HRHV measures and their incorporation into the EDC (see PD01) being an early example of this cross pollination.

Operationalisation of the Framework commenced in late Q3 2025 with the appointment of a new position, the Manager, Data Governance. Initial planning and development of foundational elements (see PD02) will occur in Q4 2025 with the inaugural meeting of the DAG planned for Q1 2026.

T01 - Microsoft Purview Pilot

Microsoft Purview is a data governance tool that helps find and label data across Microsoft 365 platforms. A four-week pilot, led by an external partner, will run from late 2025 into early 2026. The pilot aims to:

- Report on what is learnt about data security from Purview's automatic discovery process.
- Understand Microsoft's approach to data security and ways to manage risks.
- Make long-term compliance recommendations and suggest key initiatives.

Microsoft Purview is expected to improve records management in Microsoft 365 by helping classify documents and emails and by supporting automatic retention and disposal rules.

The Director, Service Management (DIT) will lead the Purview pilot throughout H1 2026.

T02 – SharePoint Communication Hub

An external partner has been engaged to undertake activity in Q1 2026 to implement a "communications hub" within the Microsoft SharePoint environment. While the scope of this work is focused primarily on the web and content delivery elements of SharePoint (e.g. defining an information architecture for content) it includes deliverables for a "content governance strategy".

This content governance strategy is expected to provide guidance on future activities that may be needed to drive broader adoption of SharePoint and associated technologies. In particular, it is expected that this will include insight on use of OneDrive for SharePoint document management.

Which resulting additional activities are undertaken and when they're scheduled for, will be informed by resourcing availability and prioritisation.

The Director, Service Delivery (DIT) has responsibility for delivery of the engagement. Delivery is expected on / near end of Q1 2026.

T03 - BDMS replacement

The Banner Document Management System (BDMS) is a part of the broader Banner student management platform from Ellucian. The university is currently in the design and development phase of a major project to migrate from Banner to the TechnologyOne (T1) student management platform.

The migration will provide several record management related benefits:

- The review / refinement of document retention and disposal practices.

- Adoption of a contemporary SaaS based solution with associated continuous update and patching processes.

Implementation of the T1 records management tool is a core part of the Student Management Transformation Project (SMTP). The SMTP is a tier 1 strategic initiative for the university.

The Project Director, Student Management System is responsible for the delivery of the SMTP. The project is currently planning for an October 2026 release.

T05 - OpenText Content Manager Licensing

OpenText Content Manager is the university's long-term central records management platform. The platform was adopted in 2008 with perpetual licensing for on-premise based hosting. While the perpetual licensing is relatively cost effective it is limiting both in terms of the number of users allowed access. The on-prem hosting has led to slower than ideal adoption of new versions and their associated feature improvements.

A variety of license options are available for Content Manager, including a more contemporary subscription-based model. These models allow for greater numbers of users (some even allowing unlimited general access) but would come coupled with risk of higher pricing over time.

The T05 roadmap activity will review the then available licensing options of Content Manager, produce a recommendation for future licensing and will develop any supporting business cases / proposals needed to secure the necessary approvals and/or funding.

This activity will be jointed owned by the Manager, Policy and Records and the Associate Director, Enterprise Architecture. The activity will be conducted in mid-2026 ahead of the October 2026 renewal.

8. Glossary

Term	Definition
Principle	A general rule used to help inform decision making.
Enterprise Data Catalogue (EDC)	The definitive catalogue / register of data assets of interest and value to the University.
Enterprise Data Model (EDM)	A visual representation of the Enterprise Data Catalogue.
SMTP	Student Management Transformation Project. The large transformation project that will see TechnologyOne replace Banner as the university student management platform.
HRHV	High risk / high value. Used as part of the Records Management Policy that help guides the information of particular importance to records management practices.