



Joint Media Statement 6 May 2020

COVID-19: The duty to document does not cease in a crisis, it becomes more essential

The Australian and New Zealand Information Access Commissioners join with their international counterparts in their clear call for documentation, preservation and access to information as governments, businesses and citizens deal with the COVID-19 pandemic. The following statement has been released by International Conference of Information Commissioners and aligned organisations to recognise and promote sound information management practices as part of Information Awareness Month:

The statement calls for three mandatory actions:

1. Decisions must be documented
2. Records and data should be secured and preserved in all sectors
3. The security, preservation and access to digital content should be facilitated during the shutdown

The full statement reads:

We, the signatories of this statement, call on governments, businesses, and research institutions around the world to document their decisions and transactions now and for the future.

Building on the UNESCO communique [‘Turning the threat of COVID-19 into an opportunity for greater support to documentary heritage’](#) and reinforcing the call that decision-makers in the public and private sectors recognise the value of records management and archives, the statement has three calls to action:

Decisions must be documented

Sound records management is more important than ever with governments taking unprecedented steps to deal with the COVID-19 pandemic.

Important decisions are being made by governments involving huge interventions in markets, healthcare and the daily lives of billions of people as they seek to secure the social, economic and cultural wellbeing of their populations and uphold the rule of law.

The pandemic is showing the benefits of access to large and small scale data to inform decision-making, but this does not reduce the need to contextualise records (i.e. paper documents, data, algorithms, code, audio-visual), nor does it exempt governments from documenting their data analysis processes or capturing critical information.

It is essential that the basis of those decisions, the decisions themselves and the senior decision-makers involved are thoroughly documented in order for governments to remain accountable both during and after the emergency and for future generations to be able to learn from our actions.

In these current circumstances, records may be at risk as new ways of working are rapidly adopted without the usual processes and infrastructure.

Urgent steps should be taken to address recordkeeping in [ephemeral technologies](#) that have to be deployed rapidly.

Records and data should be secured and preserved in all sectors

The duty to document does not only rest with governments, but also with commercial, research and educational institutions.

The impacts of the pandemic will be far reaching, and all organisations need to be cognisant of the importance of proper data and records management. Commercial entities will need essential records to be maintained for the continuity of operations, to evidence rights and entitlements, but also to be able to apply for government subsidies.

Research and educational institutions, especially those involved in tracing the disease, mapping and analysing the pathogen's genome to develop vaccines, must ensure that their records and data are accurate and properly maintained.

The existence of proper documentation practices will enable not only business continuity, research and innovation, but also the evidence of how this crisis was managed for future generations. Archives are the custodians of the 1918 influenza pandemic records, which are being studied by scientists around the world and these institutions will eventually be the stewards for records related to the COVID-19 pandemic.

The economic and societal impact of the current pandemic needs to be evidenced, not only to prevent and/or anticipate similar events but to understand the effect this event will have on current and future generations.

The security, preservation and access to digital content should be facilitated during the shutdown

The ability to study the COVID-19 pandemic, in order to prevent other such events, requires the existence of records management services and archives, otherwise records and data will not be generated and captured in ways that will enable their preservation and access, now or in the future. Records and archives are more than paper documents marked 'official record' – records and recordkeepers deal with increasingly complex digital materials such as algorithms and rough or raw data.

As the economic impact of COVID-19 is felt around the world, it will also be critical to secure, capture and preserve the records of defunct companies and/or private entities. This way, the social, cultural and even economic significance of former undertakings can live on.

Just as it is essential to have global agreements on reporting standards, specifications and definitions (as in the Sendai Framework), so it is necessary for archives to be recognised and resourced as the custodians of the raw data that underpins composite data or reported information. The duty to document this information does not cease in a crisis, it becomes more essential than ever.

Co-signed by:

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Elizabeth Tydd, Information Commissioner, New South Wales

Rachael Rangihaeata, Information Commissioner, Queensland

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Michael Manthorpe, Ombudsman, ACT
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For further information, please contact:

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About the Western Australian Information Commissioner

The Information Commissioner is an independent officer who reports directly to Parliament. The position is established by the *Freedom of Information Act 1992* (**the FOI Act**) and is supported by staff of the Office of the Information Commissioner (**the OIC**).

The main function of the Information Commissioner is to, in response to complaints by applicants, provide independent external review of decisions made by agencies on access applications and requests to amend personal information under the FOI Act.

The Information Commissioner's other responsibilities include:

- ensuring that agencies are aware of their responsibilities under the FOI Act;
- ensuring that members of the public are aware of the FOI Act and their rights;
- providing assistance to members of the public and agencies on matters relevant to the FOI Act; and
- recommending to Parliament legislative or administrative changes that could be made to help the objects of the FOI Act to be achieved.