

# Managing records in M365

## IMPLEMENTATION TOOL

### INTRODUCTION

This guidance will help Tasmanian Government organisations understand how Microsoft 365 (M365) interacts with the [Information and Records Management Standard](#) (the Standard), highlighting compliance issues and mitigation strategies.

It also endorses [CAARA's Functional Requirements for Managing Records in Microsoft 365](#) to help you meet Australian records management standards.

### WHAT IS M365?

M365 is a set of software products, defined by Microsoft as a 'productivity solution', including email, office applications and collaboration tools.

M365 is designed to be flexible, providing access via cloud-based subscriptions. Software updates and new features are released frequently. These features, combined with tiered licences, local configuration options, and potential integration with third party products means that every deployment is different.

To meet Australian recordkeeping standards, M365 must be configured appropriately, and relevant technical and management controls put into place.

### COMPLIANCE CHALLENGES

M365 functionality	Compliance challenge
<b>Records declaration</b>	M365 requires content to be 'declared' a record by applying retention labels and policies. This is inconsistent with the Standard, which applies to all business information, regardless of format.
<b>Treatment of metadata</b>	M365 relies on centralised metadata stores, where documents inherit retention and disposal metadata based on their location. In recordkeeping systems, retention and disposal metadata is permanently attached to each record. The Standard requires persistent linkages between records and their metadata be maintained. Maintaining linkages between records and metadata is challenging in the M365 environment.
<b>Export</b>	Microsoft 'Retention labels' do not persist when the content is moved outside M365. The Standard requires records and metadata to be managed through migration, conversion, decommissioning and/or digitisation processes. Retention and disposal metadata for a batch of records can be exported from M365 to Excel/CSV but needs to be configured each time.

M365 functionality	Compliance challenge
<b>Audit logs</b>	Audit logs are retained for a limited time within M365. The default setting is 90 days retention. The Standard requires organisations to retain records and metadata for the period specified in authorised Disposal Schedules. Systems designed to manage records retain access and change logs permanently and they are exportable from the system even after the record has been deleted.

RECOMMENDED STRATEGIES

M365 can meet your information and records management (IRM) needs. To achieve compliance, careful configuration and ongoing governance are required.

The following actions will also support compliance:

Mitigation strategies	
<b>Update policy</b>	Your Information and Records Management (IRM) Policy should cover M365 content. This provides clarity and guidance for staff about their records management responsibilities while using the platform.
<b>Create cross-functional teams</b>	Compliance controls are distributed across multiple applications in M365. Developing a collaborative culture across your IT and IRM teams will achieve the best outcomes.
<b>Identify roles and responsibilities</b>	Identify and formally assign responsibility for M365 records management in line with your organisation’s existing roles and responsibilities. Ensure senior executive are aware that their records management responsibilities extend to M365 content.
<b>Develop capability</b>	Ensure staff have the relevant skills and authority to actively manage information in M365. Provide tools and training to help them meet their responsibilities. Extend training to board members, elected representatives, volunteers and contractors if appropriate. Support your IT and IRM teams to develop the specialist skills and knowledge they need to identify, maintain, and extract permanent value records from M365.
<b>Deploy big bucket retention and disposal</b>	In M365, retention applied at container level is automatically inherited by all content in that container. A rolled-up or big bucket retention policy works well in this environment. This also helps users understand retention requirements if they apply their own retention labels.
<b>Automate processes</b>	Australian users may be confused by, or not understand some features in M365 because they are based on a different recordkeeping model. Where possible use automated labelling, standardised metadata and alerts. For example, configure automated record label classification based on metadata and content keywords to run in the background, rather than requiring users to do it.

### **Monitor compliance**

Produce regular reports to monitor compliance with the Standard. Monitor and review audit logs, security breaches, event logs, and other granular information about records destruction, storage and access. This is evidence of good information management and useful for audit purposes.

The State Archivist endorses [Functional Requirements for Managing Records in Microsoft 365](#) for use by Tasmanian Government organisations. This publication sets out principles and functional requirements and can be used to conduct a gap analysis.

### NEXT STEPS

Familiarise yourself with M365 records management controls. Conduct a gap analysis to inform how to configure M365 for your business context.

Questions may include:

- Will your users willingly apply records management controls in M365?
- Will user experience suffer if you lock-down collaborative and productivity aspects to achieve compliance?
- Are additional controls and configuration changes needed to comply with regulation, standards, etc?
- Do you need an upgraded licence to enable compliance?
- If you cannot make M365 compliant, can you integrate with a traditional EDRMS or other third-party product to ensure you meet compliance requirements?
- Do you have the skills and capability in-house to support and maintain an integration with third-party products?
- If you outsource configuration and maintenance of M365, are vendors aware of compliance requirements?

### MORE INFORMATION

- Office of the State Archivist (2020) [Information and Records Management Standard](#)
- Council of Australasian Archives and Records Authorities (CAARA) (2021) [Functional Requirements for Managing Records in Microsoft 365](#)

We also recommend the following resources:

- Queensland Government (2021) [Manage your records and Microsoft 365](#)
- Public Record Office Victoria (2022) [Microsoft 365: Recordkeeping within a Microsoft 365 environment](#)
- Territory Records Office, ACT Government (2021) [Records Advice: Strategy - Microsoft M365 Compliance](#)

## CONTACT US

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*Managing records in M365* is part of the *Tasmanian Government Information Management Framework*. It supports the *Information and Records Management Standard*. This is a living document and we will make minor changes as needed. If you notice anything that needs updating, please let us know.



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## Document Development History

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