Department of **Creative Industries, Tourism and Sport**
State Records Office of Western Australia

GOVERNMENT OF
WESTERN AUSTRALIA

Records Management Advice

Artificial Intelligence (AI) and Record Keeping

This document provides State Records Office (SRO) guidance for managing information risks and record keeping requirements associated with the use of Artificial Intelligence (AI). The management of records created or affected by AI should form part of a State organisation's information and records management strategy encompassing all information created or received as evidence of business activity.

This guidance should be read in conjunction with the Western Australian (WA) Government Artificial Intelligence Policy (the AI Policy) and AI Assurance Framework.

WA Government Artificial Intelligence Policy

The AI Policy sets out the principles which underpin the WA Government's approach to using AI responsibly. It supports the public sector to explore and use AI solutions in a safe and ethical way. It encourages innovation while making sure risks are managed.

The AI Assurance Framework (self-assessment) supports entities to evaluate their AI project's implications, risks and controls in a way that aligns with the principles set out in the Policy and the National Framework for the assurance of AI in government.

The self-assessment is mandatory for any system or project which involves the use of AI or automated decision making. The self-assessment is required, whether an AI system is procured, built or otherwise sourced or adapted.

What is Artificial Intelligence?

"An engineered system that generates predictive outputs such as content, forecasts, recommendations, or decisions for a given set of human defined objectives or parameters without explicit programming. AI systems are designed to operate with varying levels of automation." (Source: WA Government Artificial Intelligence Policy).

Ethical principles and record keeping

The use of AI must align with the policy requirements of the WA Government Artificial Intelligence Policy and Assurance Framework and other legislative requirements set out in the AI Assurance Framework. Working with ethical frameworks with appropriate human oversight for the use of AI technologies will:

• prevent or mitigate bias or harm

• ensure content outputs are accurate and not misleading

• prevent or mitigate the likelihood of malicious activity

• uphold fundamental human rights

• protect personal or sensitive information.

AI and record keeping

Comprehensive record keeping is essential for transparency, compliance, and effective management of AI-related activities.

Capturing records related to the use of AI in business activities

As per section 3(2) of the *State Records Act 2000,* State organisations must ensure record keeping practices document the use of AI in business activities. This should include records related to design, testing, implementation, system evaluation and decommissioning. The management of digital information should comply with the State Records Commission Standards. Consider the points outlined below:

Records described in this section are captured in the AI Assurance Framework (self-assessment). Agencies are encouraged to complete the self-assessment to ensure they are capturing these important points.

• Authorisation:

- o Establish well-defined responsibilities and clear lines of accountability for the adoption of AI systems.
- o Appoint an AI Accountable Officer, establishing clear lines of accountabilities for the adoption of AI systems. This is mandated by the WA Government AI Policy and further described in the AI Governance toolkit for entities.

• Technology/software/application employed:

- o Record the specific technology, software, or application used in AI-related processes.

- o Explain the purpose, functionality, and relevance of employing this technology.
- o Maintain an AI use case register and AI tools reference list as recommended in the AI Governance toolkit for entities.

• Generated Records:

- o Describe the records intended to be produced as a result of AI activities.
- o Include details about the content, format, and context of these records.
- o Documents or records generated with the use of AI should include a user warning / notice.

• Data Sources:

- o Identify the sources of data accessed, used, inferred, or obtained by AI systems.
- o Identify the purposes of using the data sources.
- o Specify how this data contributes to the overall records.

• Exclusions and Reasons:

- o Clearly state which records or data should not be accessed or used.
- o Provide reasons for exclusions, such as confidentiality, personal privacy, or security concerns.

• Addressing Issues:

- o Discuss potential issues related to bias in algorithms and data sets.
- o Consider intellectual property rights (including copyright) and the risk of incorrect content due to the incorrect interpreting of data that misrepresents reality or factual information known as AI "hallucinations."

• Risk Assessment:

- o Evaluate risks associated with AI implementation.
- o Incorporate information classification considerations to ensure authorised disposal practices and proper handling of records.

All records created by or through using AI in State organisations must be kept in accordance with the *State Records Act 2000*, and principles and standards issued by the State Records Commission. The retention and disposal of these records would be aligned to the functional activity.

Use of AI in records management

AI has demonstrable benefit to government, community and cultural collections with the ability to interrogate and make contextual relationships within vast data sets at a rapid rate. It is optimal that these activities are undertaken under the control of

an archivist or information management professional to provide maximum benefit to researchers and the community.

While AI can optimise or automate record keeping processes such as document classification and retrieval, these should be processes overseen by an appropriately skilled human being with relevant skills, knowledge, authority and documented line of responsibility to check and confirm the accuracy of records.

In particular, the disposal of records process must have human oversight and be in line with the relevant retention and disposal authority(ies). This ensures the integrity of AI records as evidence and their accessibility now and into the future.

The Artificial Intelligence toolkit for WA public sector staff outlines key matters staff should consider when reviewing AI-generated content.

AI note taking

AI powered tools (such as Google Gemini and Microsoft Copilot) are increasingly being used in workplaces to automate meeting note taking. These systems can transcribe conversations, identify action items and generate summaries. While automating note taking seems efficient, there are record keeping considerations.

Unlike human note-takers, AI lacks contextual understanding of the organisation or industry. It cannot apply professional judgment to determine which ideas need elaboration or simplification and may even record information incorrectly, especially if there are multiple speakers or overlapping dialogue.

AI note takers that produce a transcript or summary of discussions may, in doing so, record or generate information of a type that should be subject to protections, including personal information that is then. subject to the Information Privacy Principles of the Privacy and Responsible Information Sharing Act 2024.

Refer to the RMA Retention of Personal Information to understand the relationship between record keeping and the laws and regulations that govern the handling of personal information.

It is important to not circulate automated notes or transcripts of meetings as records of the meeting's minutes without a human checking for authenticity, reliability, integrity and usability. The Artificial Intelligence toolkit for WA public sector staff outlines matters staff should consider when reviewing AI-generated content.

Recommendations

When using AI note taking systems, the SRO recommends organisations should:

- Complete the self-assessment under the AI Assurance Framework.

- Develop internal policies and training that govern the use of such tools by organisation employees, including obtaining user consent prior to deploying AI note takers in meetings, and awareness of record keeping responsibilities of the recordings and/or transcripts / notes.
- Consider where the systems are storing the transcripts and recordings. Data storage locations in different jurisdictions could involve varying privacy laws. Organisations should refer to guidance in the WA Government Data Offshoring Governance.
- Manage the retention and disposal of these records according to the General Retention and Disposal authorities published by the SRO on wa.gov.au.

Automated decision making

Entities that are subject to the *Privacy and Responsible Information Sharing Act 2024* (PRIS Act) must also consider the application of Information Privacy Principle 10 (IPP 10) which relates to the use of automated decision making.

IPP 10 provides that entities must create or capture key records, including notifications and assessments, if the entity employs an automated decision-making process involving the use of personal information in making significant decisions about individuals.

Related documents

Visit the main webpage [www.wa.gov.au/WaPublicSectorAI] for a range of resources to support the use of AI in the WA public sector.

- WA Government Artificial Intelligence Policy (updated 2025)

- WA Government Artificial Intelligence Assurance Framework (self-assessment)

- Artificial Intelligence governance toolkit for WA public sector entities

- Artificial Intelligence toolkit for WA public sector staff

- Microsoft 365 Copilot Guidance for WA Government Entities