

Managing records in M365

IMPLEMENTATION TOOL

Introduction

This guidance will help you understand how Microsoft 365 (M365) interacts with the *Information and Records Management Standard* (the Standard). It highlights compliance issues and mitigation strategies.

It also endorses *Functional Requirements for Managing Records in Microsoft 365*. This publication will help you meet Australian records management standards.

What is M365?

M365 is a set of software products, defined by Microsoft as a 'productivity solution'. M365 includes 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:

- configure M365 appropriately
- put relevant technical and management controls put into place.

Compliance challenges

Records declaration

M365 requires content to be 'declared' a record by applying retention labels and policies. This is inconsistent with the Standard. The Standard applies to all business information, regardless of format.

Treatment of metadata

M365 relies on centralised metadata stores, where documents inherit retention and disposal metadata based on their location. In records management systems, retention and disposal metadata is permanently attached to each record. The Standard requires maintenance of persistent linkages between records and their metadata. This is challenging in the M365 environment.

Export

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
- digitisation processes.

Retention and disposal metadata for a batch of records can be exported from M365 to Excel/CSV. But you need to configure this each time.

Audit logs

Audit logs are retained for a limited time within M365. The default setting is 90 days. The Standard requires retention of records and metadata for the period specified in authorised Disposal Schedules. Records management systems are designed to retain access and change logs permanently. These systems allow logs to be exported even after the record has been deleted.

Recommended mitigation strategies

M365 can meet your information and records management needs. To achieve compliance, you will need careful configuration and ongoing governance.

The following actions will also support compliance:

Update policy

Your Information and Records Management Policy should cover M365 content. This will provide clarity and guidance for staff about their records management responsibilities.

Create cross-functional teams

Compliance controls are distributed across multiple applications in M365. Developing a collaborative culture across your IT and records teams will achieve the best outcomes.

Identify roles and responsibilities

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.

Develop capability

Ensure staff have the relevant skills and authority to manage information in M365. Provide tools and training to help them meet their responsibilities. You might also need to extend training to:

- board members
- elected representatives
- volunteers
- contractors.

Support your IT and records teams to develop the specialist skills and knowledge they need to:

- identify
- maintain
- extract permanent records from M365.

Deploy big bucket retention and disposal

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. It also helps users understand retention requirements if they apply their own retention labels.

Automate processes

Australian users may be confused by, or not understand some features in M365. This is 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
- other granular information about records destruction, storage and access.

This is evidence of good records management and useful for audit purposes.

Next steps

The State Archivist endorses *Functional Requirements for Managing Records in Microsoft 365* for use by Tasmanian Government organisations. This sets out principles and requirements to help you meet Australian records management standards. You can use it to conduct a gap analysis.

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 records management system 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

- Australian Digital Recordkeeping Initiative (2021) [Functional Requirements for Managing Records in Microsoft 365](#), Council of Australasian Archives and Records Authorities website, accessed 7 January 2026.
- Office of the State Archivist (2024) [Information and Records Management Standard](#), Version 1.1, OSA, accessed 7 January 2026.

We also recommend the following resources:

- Public Record Office Victoria (2025) [Microsoft 365: Recordkeeping within a Microsoft 365 Environment](#), PROV, accessed 7 January 2026.
- Queensland Government (2024) [Manage your Public Records and Microsoft 365](#), Queensland Government, accessed 7 January 2026.
- Territory Records Office, ACT Government (2024) [Records Advice: Strategy - Microsoft M365 Compliance](#), Version 2.1, TRO, accessed 7 January 2026.

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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

Version	Date	Comments
1.1	12/01/2026	New template, URLs updated, formatting changes, minor edits
1	30/06/2022	Initial release
