



The National Archives

## **Identifying and Specifying Requirements for Offsite Storage of Physical Records**

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Author: Tim Callister, Richard Blake

The National Archives  
Ruskin Avenue  
Kew  
Richmond  
Surrey  
TW9 4DU

Email: [rmadvisory@nationalarchives.gov.uk](mailto:rmadvisory@nationalarchives.gov.uk)

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## Introduction

### 1.1 Purpose

The purpose of this guide is to cover the main issues an organisation will that may need to address when defining its required service level from an offsite storage contract for current or semi-current records offsite with a commercial contractor.

The document can either be used as a starting point for developing a specification or as a means to assess, validate and refine pre-existing requirements. The reader may refer to any of the sections as required and should not be treated as a rigid document that must be read in one sitting.

The term physical record is used here to include not only paper files, but any physical artefact that contains, or provides, information (e.g. books, laboratory samples, CDs and plans etc).

### 1.2 Scope

The document will cover twelve important areas that must be considered when an organisation is in the process of developing an understanding of their requirements from an offsite store. Each section will propose questions that cover the following topics.

- **Identification of Record Categories**
- **Development of Disposal Policy**
- **Security Management**
- **Access and Retrieval of Records**
- **Transport of Records**
- **Modes of Storage**
- **Environmental Conditions**
- **Auditing and Reporting**
- **Exit Strategy**
- **Purchasing**

It is specifically *not* intended to cover the specification and provision of an archive facility for permanent preservation of physical records as this is a very different exercise.

Whilst primarily intended for the initial (or a first time contract) the principles of this document are also valid for organisations that already have established such facilities but are now preparing to tender for a new provision.

This document does not prescribe how an organisation should tender and contract an offsite store nor does it aim to provide comprehensive advice on this topic as each organisation will use the procurement methodology favoured by their sector. Further considerations about purchasing and procurement are covered in Section 12 [Procurement](#).

In some circumstances this need may be best provided via a consortium or shared service model. Organisations which are in a position to use such facilities may achieve an economy of scale which would not otherwise be achievable.

### **1.3 Audience**

The principle audience is any public body from a large organisation such as a Local Authority to smaller organisations such as schools or GPs. Other organisations (beyond the public sector) may also find the guidance useful.

As contracting and managing an offsite store may not be restricted to Record Management specialists, this guide is intended for use by *any* personnel engaged in the development, business case or specification for outsourced offsite storage offered by commercial third parties.

It is highly recommended, however that the organisation engages with either its own or external record or information management expertise to ensure that the final specification will actually provide an appropriate offsite management service does not compromise good record management practice.

### **1.4 Assumptions**

It is assumed that the offsite store will normally be owned and managed by a third party rather than being established by the organisation, and that the organisation will need to specify levels of service in as a contract with a selected storage provider. It should still be noted however, that all the considerations are applicable if an organisation is considering developing its own service, or buying into an established contract to form a shared service.

This document assumes that the applicable legal and regulatory requirements will be part of every standard contract such as public procurement rules and health and safety obligations. As such these areas will be referenced but not analysed in any detail. Users are recommended to seek professional advice on these matters.

Whilst this document provides advice and guidance it should not be used as the sole basis for developing a formal contract. Each organisation must take account of its own operating environment and the current protocols for procurement and contract management. Essentially this document is a tool to aid assessment of potential contractual need for an offsite storage facility as part of its normal records management processes.

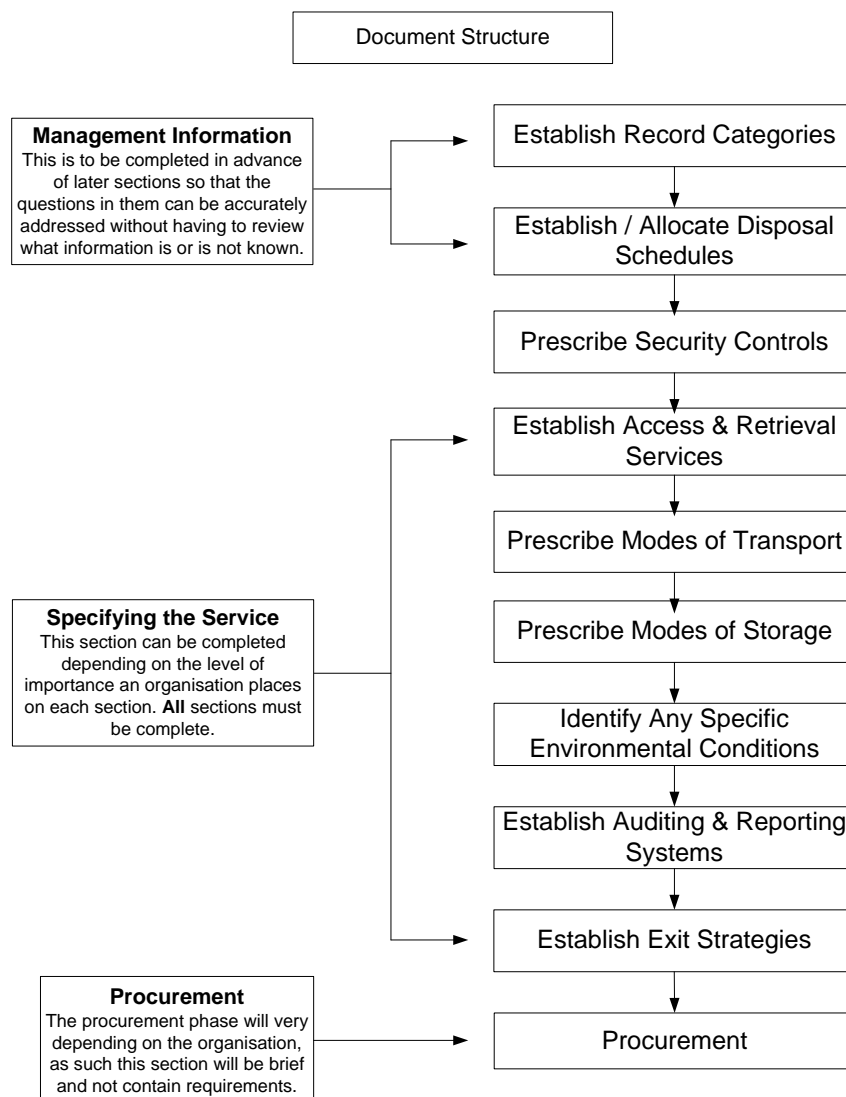
## 2. How to Use this Document

### 2.1 Document Structure

The diagram below outlines the three main sections of this document.

- [Management Information](#) - combines the considerations essential to identifying records and establishing their management needs.
- [Specifying the Service](#) - divided into six areas that cover the specification of the required level of service, and storage expectation for an offsite store. These areas can be approached in a modular style with the reader addressing each subject as they need to.
- [Purchasing](#) - does not contain any considerations, but expands upon the responsibility of organisation to procure the service using the appropriate guidance and legislative rules relevant to their purchasing framework.

Each section under [Management Information](#) and [Specifying the Service](#) contains considerations covering different aspects of specifying an offsite storage service. In some circumstances a consideration may not be applicable but the organisation should be clear that it has identified and indicated where this is the case.



## 2.2 Table Structure

The following table identifies each cell of a consideration table along with a brief explanation of the associated content.

<b>No:</b> 1.0 The unique number for each consideration.	<b>Consideration:</b> The text for each consideration is a brief statement identifying an issue that must be considered prior to entering an agreement with a contractor.
<b>Rationale:</b> The rationale provides a reasoning and context for each consideration. It also indicates the benefit of implementing the consideration. Where appropriate the rationale will also indicate any associated risks of not including a consideration into a specification for an offsite store.	
<b>Questions:</b> Q1. Questions are included to prompt the reader on issues to be addressed to meet the needs of a consideration. Every question has a unique number and corresponding numbered outcome. When responding to each question the organisation must carefully consider the impact of its response. In particular, if an organisation answers "no" to a question, serious thought should be given to the impact this could have on any specification for offsite storage. Each organisation must make risk assessments ensuring that actions related to the consideration are properly informed and follow the organisation's protocol.	
<b>Outcomes:</b> A1. Corresponding numbered outcomes are included not as "the answer" but as a prompt towards the preferred way a question should be addressed. Each outcome aims to provide some reasoning and discussion points to help the reader determine their ability to address the consideration. Outcomes may contain an indication of what is at stake if the question remains unanswered or answered negatively. The risks associated with each consideration will vary for each organisation, however, it is hoped that this section will enhance the reader's understanding of the potential issues involved so that key decisions can be made to the benefit of the organisation.	

## Management Information

Writing the specification for an offsite store can be a significant undertaking. The task of determining the exact nature and extent of records to be moved offsite must be as accurate possible to ensure the required delivery services and storage capacity are provided.

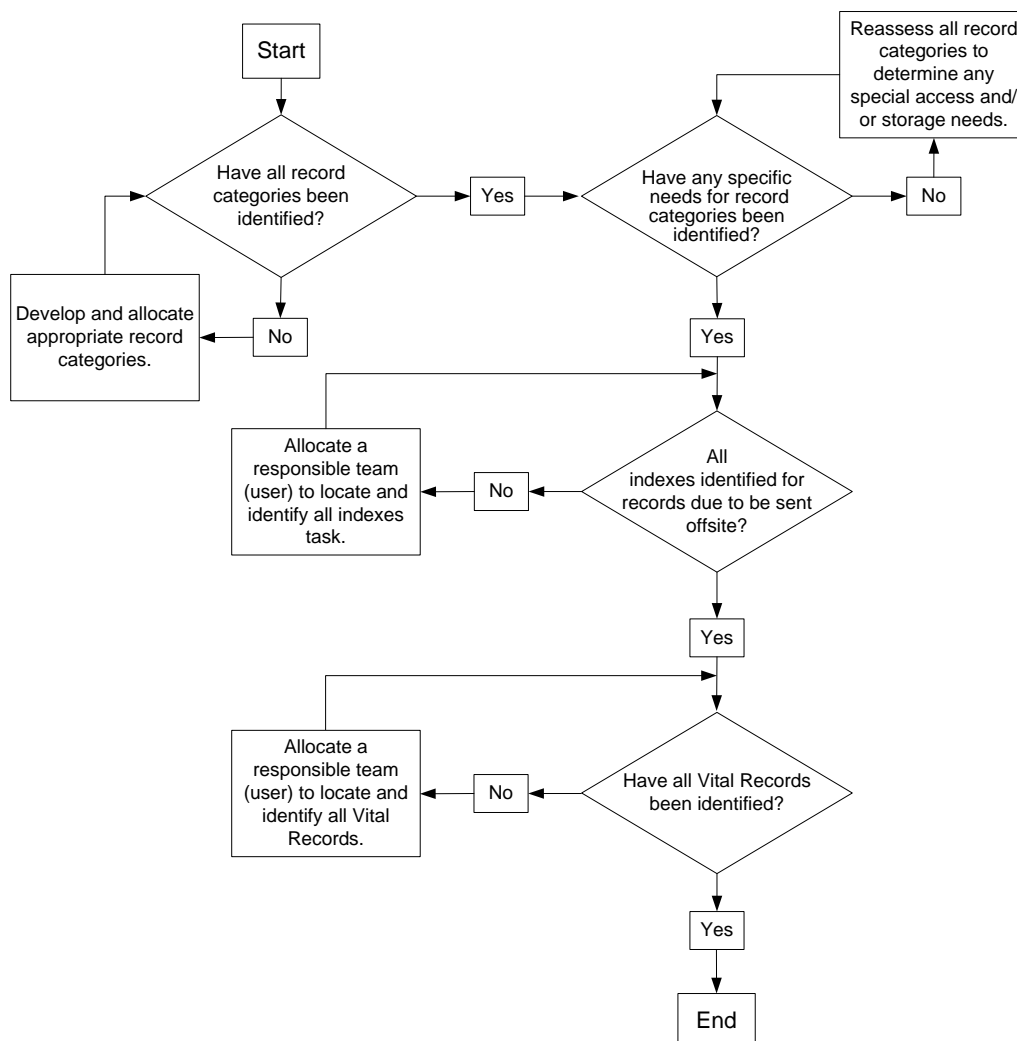
### 3. Identification and Categorisation of Records

Within this document “record category” refers to any logical sequence, set, or series of records. Records may be classified by function, organisation, case number, project name, physical format or retention periods.

The purpose of identifying and creating record categories is to enable the organisation to form logical arrangements of records which have clear management and access rules associated with them.

If an offsite storage specification is to be fit for purpose it is essential that categories of records, and their characteristics, are identified and articulated clearly.

#### Identifying Record Categories



### 3.1 Identifying Record Categories

Understanding and identifying the records an organisation possesses is vital to the success of specifying the services required from an offsite store.

Whilst the process of record categorisation may be lengthy, if not done there is very little chance that records can be managed effectively by the offsite contractor. This will lead to the organisation paying for a service that cannot provide any real business support in terms of managing its information.

<b>No:</b> 1.0	<b>Consideration:</b> Identify the categories of record that require offsite storage.
<b>Rationale:</b> A record category is any grouping of records by characteristics that assist with their identification and management. An organisation will need establish its own criteria for categorising its records based on the most practical way they can be managed offsite. If existing, or proposed, record categories do not enable effective management via an offsite store then they will need to be reconsidered <i>prior</i> to sending records offsite. For example, the physical format of a record is not sufficient criteria to understand how records can be accessed and managed offsite. Other characteristics such as retention period, function and purpose are needed to ensure effective record categorisation. The assessment and development of record categories is a timely and specialist task. Where available the organisation must look to record management expertise to perform this task. If expertise is not available within the organisation, it must seek external expertise to perform this function.	
<b>Questions:</b> Q1. Are all records associated with a known record category? Q2. What are the characteristics used to define record category (e.g. function and format)? Q3. Are owners and users of record categories known or identified? Q4. Are the current locations of all records in a record category known? Q5. Is the volume of records in each category known and verifiable (e.g. number of files and linear measurement scale)? Q6. Do any record categories require specific security provisions? Q7. Do any record categories include vulnerable or fragile records?	
<b>Outcomes:</b> A1. If the organisation cannot develop record categories it places itself at a significant risk as the records cannot be identified as a group or managed effectively. Categorised records will deliver benefits including (but not limited to): <ul style="list-style-type: none"><li>• Timely disposal of records in accordance with agreed retention periods.</li><li>• Avoidance of storage costs for records that should have been destroyed.</li><li>• Ability to track and locate business critical information at any time.</li></ul>	

**Outcomes:**

- A2. Awareness of a record category's profile is important as it may detail the physical nature of a record. This will be of particular importance for heavy records, oversized records such as maps all of which will require specific storage requirements to protect them.
- A3. Typically the owner of a record category is responsible for authorising access to the records (in many cases a specific branch of an organisation may be the "owner" for a particular category).  
Establishing the appropriate authority figures and likely users of the records will inform certain decision making, access controls, as well as the anticipated level of service required for each record category. This will provide specifications for access that reflect the actual business need and assist in controlling overall costs. If this information is not identified it could cause the following issues:
- Unauthorised access to records.
  - Inability to assess the status of records in a timely manner.
  - Costly uncontrolled retrievals for review of records that lack management information.
- A4. Knowledge of the current location of records in each record category will identify the current business need (e.g. multiple geographical location sites) and related transport overheads.  
If the location of all records per record category is not known, it will be difficult to define the required level of use and transport for records.
- A5. The volume of each record category and any known accrual rate can ensure an accurate calculation of the overall storage requirement. Where this is not known storage figures may be miscalculated resulting in either excess cost or a lack of future storage capacity.
- A6. An organisation may choose to sub-divide record categories by a security provision such as protective markings or Government Security Classifications (i.e. Unclassified, Restricted etc).  
If a record category requires increased, or specific, security provisions the organisation will need to decide if the records can go offsite. Particularly where the records contain sensitive or personal data.  
For further discussion on security considerations see Section 5 [Security Management](#).
- A7. Any fragile or vulnerable records must be provided with adequate protection when stored. If fragile records are stored offsite sufficient provision must be made for them. This will include, training for the contractor's staff on handling the records correctly. Further information on specifying storage for vulnerable records is available in Section 8.2 [Vulnerable Records](#).

### 3.2 Needs of the Record Categories

Not all categories of record require the same storage and access requirements. An organisation needs to consider the potential impact of both of these themes when developing a specification for an offsite store.

<b>No:</b> 1.1	<b>Consideration:</b> Review record categories and develop criteria for how they may be organised offsite.
<b>Rationale:</b> Records in an offsite store can be organised in any number of ways. For example, the organisation (and by extension the contractor) could choose to organise all records within a record category by case number, retention period, a specific security requirements depending on the record category. Whatever the chosen means it must be consistent and maintained through out the life of the record category within the offsite store to ensure the ongoing management of the records.	
<b>Questions:</b> Q8. Must the records continue to be organised in order (e.g. by case number)? Q9. Are there categories of records that are required for frequent access? Q10. Is there sufficient means to identify records subject to information requests during and after a transition to offsite storage?	
<b>Outcomes:</b> A8. Where physical format or environmental controls are not specific to a record category, records can be more effectively stored by allowing a contractor to place records wherever there is space. This type of randomised storage using barcode tracking is the most typical means of storage in commercial storage facilities as it provides greater storage efficiencies and reduced costs. Conversely records stored in a rigid order will leave empty spaces on shelves that the organisation will continue to pay for, even though the space is not being used. It also has an additional benefit from a security point of view as sensitive records are not held in a single space making it harder to identify them. This approach needs to be carefully considered, and the organisation satisfied that the contractors systems are suitably robust to cope if the tracking system fails. Because records are not organised in a rigid manner there is a potential that recovering the location of randomly stored records will take more time than those stored in a logical sequence.	

**Outcomes:**

A9. Placing the most active material as close to the centre of operations as possible with the lesser-used material further away could provide significant efficiencies within the offsite store. If this information is available to the contractor they can allow for this and potentially maximise the production of requested records.

Identifying less frequently accessed record categories could lead to cost savings in storage, as the contractor can use denser packing on shelves (i.e. 3 boxes high and 3 deep as apposed to more active records at 1 or 2 high and 2 deep to allow easier access).

A10. All public bodies have a responsibility to respond to requests for information under the Freedom of Information Act 2000, Environmental Information Regulations 2004, and Data Protection Act 1998. Such requests could occur even during a relocation to an offsite store and it will be vital that requested information is available for review and where applicable release. It should be considered best practice that an organisation can always locate information, irrespective of its current location.

<b>No:</b> 1.2	<b>Consideration:</b> Identify any record categories requiring specific storage standards.
<p><b>Rationale:</b></p> <p>Within an organisation there may be categories of records that require a specific standard of storage.</p> <p>For example an organisation may have records requiring storage with specific parameters for humidity, light etc. In such cases the organisation will need to discuss these requirements with a contractor to ensure that the conditions can be provided.</p> <p>In practice many organisations will not require specific storage facilities. It is important however, that the environment within the offsite store is controlled to ensure that the temperature and humidity levels are kept to a moderate level.</p>	
<p><b>Questions:</b></p> <p>Q11. Do any categories of record require specialised environmental storage conditions?</p> <p>Q12. Do any categories of record require specialised storage furniture?</p> <p>Q13. Can the contractor provide the required storage for any special record categories?</p>	
<p><b>Outcomes:</b></p> <p>A11. Specialised storage environments require careful planning. The organisation will need to properly articulate specific needs to a contractor <i>prior</i> to agreeing a contract ensure the specified environment can be provided.</p> <p>If this is not specified there is a risk of records deteriorating beyond use or a variation to the contract to include the required conditions resulting in exceptional and punitive costs</p> <p>A12. Organisations should always consider the format of records when determining the best method of protecting them whilst stored. Where specialised storage furniture (i.e. bespoke shelving for maps) is required the organisation will need to provide detailed specifications <i>prior</i> to agreeing a contractor.</p> <p>Failure to do this may result in fragile records being stored in an inappropriate manner leading to unacceptable incidence of damage.</p> <p>A13. Providing the most effective type of storage for specific formats of records is essential to their long-term preservation. Most contractors try to meet specific storage requirements providing they are informed <i>prior</i> to receiving the records.</p> <p>Where a contractor cannot provide the required storage, the organisation must consider alternative options for the record categories that require specialised storage environments.</p>	

### 3.3 Associated indexes and finding aids

Finding aids for records provide an essential guide to what records are being held, their owners, and other key information. Inaccurate or out of date finding aids are one of the principal causes of poor records. If the organisation does not review its finding aids prior to supplying them to a contractor there is a significant risk that records may become lost, or inappropriately managed.

<b>No:</b> 1.3	<b>Consideration:</b> Locate and assess all finding aids for every record category prior to sending records offsite.
<b>Rationale:</b> An index is a useful tool in understanding a particular category of records. Organisations should retain a record, or index, for every category of record. It may be beneficial to provide a copy of any finding aids (indexes) for all records to the contractor prior to the relocation of records to an offsite store. As a minimum it will be necessary to provide an index of any boxes including a list of their contents. This is crucial and should include, but is not limited to: <ul style="list-style-type: none"><li>• Record identifier (barcode or barcode of box it is registered in).</li><li>• The record owner.</li><li>• Retention period.</li><li>• Allocated Disposal Schedule.</li><li>• Dates record / file was opened and closed.</li><li>• Links to other records.</li><li>• Location of records.</li></ul> The organisation must ensure this information can be imported into any systems being used to track the records held at the offsite store.	
<b>Questions:</b> Q14. Is there a finding aid for all records due to be sent offsite? Q15. Does the finding aid accurately describe the records, and is it up to date? Q16. Can the existing finding aid be extended, integrated or exported to work with or within an external contractor's systems?	
<b>Outcomes:</b> A14. All categories of records must have a usable finding aid. Where absent, or insufficient consideration needs to be given to developing them as matter of priority. This may form an additional requirement in the specification as it may be more efficient to instruct the chosen storage contractor to undertake the necessary work. Inability to identify records (and content) can significantly impact on: <ul style="list-style-type: none"><li>• Ongoing business.</li><li>• Response for information under the Freedom of Information Act.</li><li>• Inability to locate personal data within a record collection.</li><li>• Difficulty in executing timely disposal scheduling.</li><li>• Maintenance of access controls to records.</li></ul>	

**Outcomes:**

A15. If the finding aids do not accurately describe the records through meaningful metadata it could lead to lost time and money in re-cataloguing record categories and re-establishing their management criteria.

This effort could be very costly to the organisation both in monetary and legal terms if records are not managed correctly or become “lost” in the system.

A16. Wherever possible indexes should be digital and importable into the system(s) used by the contractor and organisation to track and manage records. This greatly reduces the need for duplicate information and helps ensure that there is a single authoritative dataset for every record category

The value of finding aids can be greatly increased if their can be transferred / integrated into other systems. Being able to move finding aid or index data into an online system may increases the organisation’s overall ability to track and manage records when held internally, offsite or with other organisations it shares the records with.

Reliance on physical finding aids (i.e. card indexes) can lead to significant loss of information. Specifically a catastrophic event such as fire could result in the loss of the entire finding aid which could seriously impair the organisation’s ability to fulfil its function.

### 3.4 Vital Records

Vital records must be identified and managed with care. Without them an organisation may not be able to effectively recover key business operations after a disaster. The organisation will have to carefully consider if storage of vital records offsite is appropriate, and decide how to communicate the importance of these records to the contractor.

<b>No:</b> 1.4	<b>Consideration:</b> Identify categories of record to be stored offsite that are considered as Vital Records.
<b>Rationale:</b> Vital Records are the essential records required for business continuity in the event of a catastrophic event. Without them the organisation cannot re-establish itself and restart its core functions. It is essential, therefore, that Vital Records are identified and given the necessary protection when held offsite. There is little point in an offsite store safeguarding records as “vital” if they no longer contain the required information. Periodically an organisation <i>must</i> review the currency of Vital Records to ensure that they are still valid and up to date.	
<b>Questions:</b> Q17. Has the organisation identified its Vital Records? Q18. Will any Vital Records be stored in the offsite store? Q19. Have Vital Records stored offsite been identified to the Contractor?	
<b>Outcomes:</b> A17. If an organisation has not identified Vital Records <i>prior</i> to being sent offsite they may not be retrieved as quickly as needed to help the business restart following a disaster. This could lead to significant loss of service by the organisation. A18. Where Vital Records are stored in an offsite store they will need to be clearly identified and given significant protection. A contractor can only do this where they are made aware of the presence of Vital Records. If an organisation is not willing to identify its Vital Records to an offsite storage provider (for security reasons) it needs to think carefully about how these records are accessed and used so that their information is not accessible to unauthorised individuals. A19. Most offsite stores are able to provide significant security for any category of record that requires an increased level of protection. If the contractor, however, is not made aware of the presence of Vital Records it will not be able to manage them as the organisation requires.	

## 4. Developing Disposal Policy

Disposal, or disposition, of records is an important part of their lifecycle. It is crucial that no records are sent offsite without being assigned a current disposal schedule with procedures in place for managing and executing disposals when due.

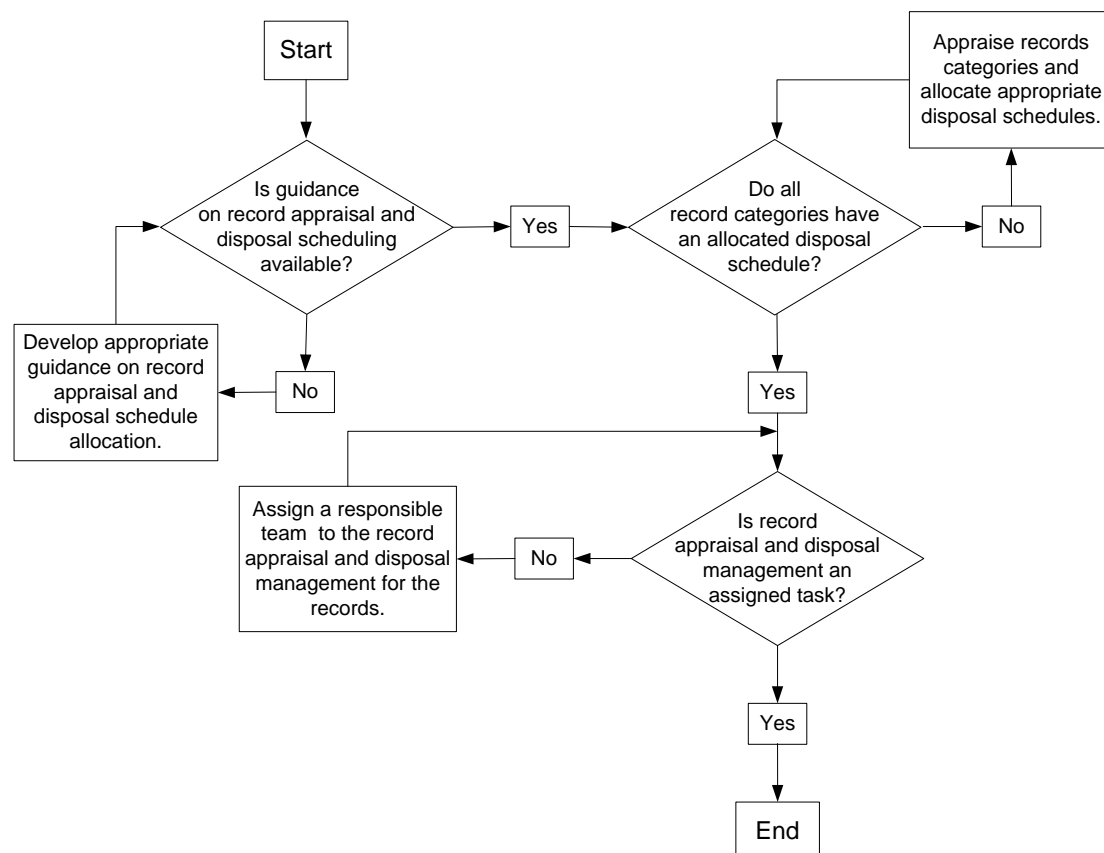
Failure to allocate and manage disposal schedules could significantly impact the management of an offsite store. If an organisation is not able to clear records due for disposal then it cannot make room for incoming records. This will result in having to pay to store excess amounts of records. More significantly it could expose the organisation to risk of contravening information legislation (i.e. Freedom of Information Act 200).

Unless specified otherwise records should be appraised by the organisation before they are sent offsite and later when the disposal schedule due date is reached. The organisation may decide that more routine records can be appraised by the contractor prior to destruction or transfer. In such cases there *must* be an agreement and system in place to prevent (or hold) the disposal schedule on any record or group of records if required.

Further guidance developing Disposal Schedules can be found on The National Archives website at:

<http://www.nationalarchives.gov.uk/recordsmanagement/advice/schedules.htm>

### Developing Disposal Policy



## 4.1 Developing Disposal Criteria

Clear and coherent disposal processes are built on disposal schedules that are realistic and can be easily applied to a record category (part of the description of a record category will be how long the record must be retained).

<b>No:</b> 2.0	<b>Consideration:</b> Develop and implement disposal schedules that clearly define the criteria for disposing of every category of record.
<b>Rationale:</b> An essential aspect of managing records is identifying when to dispose of them (or transfer them to another organisation such as The National Archives). An organisation can significantly improve the efficiency of an offsite store if disposal schedules are allocated and used. All record categories must have a defined disposal schedule. This can significantly reduce the risk of records being sent offsite without a clearly defined (and actionable) set of disposal criteria. Where large numbers of records are stored with no disposal schedule the organisation will be charged for storing records where there may be no justification for their retention.	
<b>Questions:</b> Q20. Does the organisation have current disposal schedules for each record category? Q21. Are users correctly allocating and executing disposal schedules? Q22. Can the organisation identify records overdue for destruction? Q23. Has the organisation identified records overdue for transfer to an archival body (e.g. The National Archives or designated Place of Deposit)? Q24. Does the organisation have a mechanism to review the relevance of its disposal schedules in the future?	
<b>Outcomes:</b> A20. As well as being good records management practice establishing retention periods prior to sending any records off site is a useful logistical tool. If up to date disposal schedules are not available the organisation will store records with incorrect disposal management criteria. This may lead to significant extra costs in having to recall records and reappraise them in order to allocate an accurate disposal schedule. A21. The organisation must ensure that the disposal schedules are allocated appropriately and managed effectively. In some circumstances this may mean revising schedules, which are out of date or not suitable for the record category they are associated with. In other cases it may require a revision of the available advice and guidance to users on the correct appraisal, allocation and final disposal of records.	

**Outcomes:**

A22. An appraisal of records *prior* to sending them offsite may identify records that may already be due for destruction or transfer. The organisation should seek to identify any and all records due, or overdue for disposal *prior* to sending them offsite to avoid excess costs in storing records no longer required by the organisation.

A23. Not all record categories will need to be destroyed; some may need to be kept because of their historical value. Appraising records and allocating disposal schedules *prior* to sending them offsite may identify records that are due for transfer to a relevant archival body (such as The National Archives or an appointed Place of Deposit).

Appraising records for their historical value is a specialist task and should normally be undertaken by a person with specialist knowledge in conjunction with the archival institution which normally receives such records for historical preservation once their operational value has ceased. In the case of bodies covered by the Public Records Act, this will be The National Archives or appointed Place of Deposit: where current arrangements are not known to exist, The National Archives can advise on appropriate institutions to which records may be transferred.

A24. The business and legal environment in which an organisation operates may be subject to change, possibly affecting the length of time records should be retained (either decreased or increased). The organisation must have a means of being able to update and reapply disposal schedules in as efficient and accurate way possible. Use of electronic systems to track and manage records in the offsite can provide the best response to such changes.

If an organisation cannot up date its disposal schedules there is a substantial risk that managing records in the offsite store (and elsewhere) will become very difficult. This in turn could lead to significant costs at a later date in trying to reevaluate a large number of physical records en masse.

## 4.2 Allocation and Execution of Disposal Schedules

Ensuring end-users are aware of the correct allocation of disposal schedules will significantly improve the ability of the organisation in managing its information. If the rules and guidelines are not clear (or non-existent) the organisation will not be able to successfully manage the disposal of records wherever they are stored.

Where a contractor is expected to manage some, or all of the disposals for records their staff will also need the same training and guidance as that of the organisation's users.

<b>No:</b> 2.1	<p><b>Consideration:</b> Develop and maintain clear guidance on how to allocate and execute disposal schedules.</p>
<p><b>Rationale:</b> To ensure correct management of records, it is vital that all users understand the correct process for identifying and allocating disposal schedules to records. Users must have clear guidance and associated training for all aspects of using an offsite store, in particular the allocation and management of disposal schedules for records. This guidance should be regularly reviewed to ensure its continued effectiveness for an organisation.</p>	
<p><b>Questions:</b> Q25. Does the organisation have current guidance on disposal schedule allocation and management available for all users? Q26. Is there sufficient training available for users on the management of the offsite store (and associated systems)? Q27. Will there be resource to ensure that the guidance and training are maintained and up to date?</p>	
<p><b>Outcomes:</b> A25. The key to the correct use of disposal schedules is how well users understand the purpose of allocation and execution. Guidance on the correct use and management of disposal schedules should be clearly communicated to users and available in as accessible way as possible. Failure to create and provide guidance and training may lead to the disposal schedules being inappropriately used or not at all. A26. The written guidance alone is not sufficient for an organisation to be sure that users understand how and why disposal schedules should be used. Training will need to cover the principles and rules for allocation of disposal. It should also detailed explain the technical systems used to apply and track the disposal for records in the offsite store. A27. Guidance and training is only valuable if it reflects the current working environment. The organisation should ensure that all documented guidance and training is kept up to date and relevant to the users. As the organisation changes and use of the offsite store evolves, supporting guidance and training should reflect any changes or new ways of working with the system.</p>	

### 4.3 Managing Disposal

Allocating disposal schedules is only the beginning of the disposal process. Managing the execution of disposal schedules is as important if the organisation is to prevent paying for storage of records it no longer needs.

<b>No: 2.2</b>	<b>Consideration:</b> Decide who is responsible for actively managing disposal of records.
<b>Rationale:</b> <i>Prior</i> to sending records offsite, the organisation will need to determine who is responsible for executing disposal for record. This may be the organisation, a third party contractor, or a mixture depending on the sensitivity of the record category. The organisation may decide that it is more efficient and cost effective for the contractor carryout the disposal action on records. In the case of record destruction this may be the contractor or an identified secure sub-contractor (either chosen by or agreed with the organisation). Irrespective of who executes the disposal schedule the whole process must be supported by a full audit trail for the action to ensure that the destruction of any record can be identified at a later date.	
<b>Questions:</b> Q28. Who will be responsible for monitoring when records are due for disposal? Q29. Are there systems that provide a robust audit trail for the allocation, management and final disposition for all record categories? Q30. If destruction is carried out by the contractor (or agreed sub-contractor), can they produce suitable evidence (including destruction certificates) that records are being securely destroyed? Q31. Will records be destroyed by an appropriately security cleared in a secure controlled location? Q32. Will records be destroyed in an appropriate manner that ensures no information can be obtained from them after disposal?	
<b>Outcomes:</b> A28. The organisation may choose to monitor record disposal, delegate it to the contractor, or a mixture of the two depending on the record category. Irrespective of this decision there must be confidence that whoever is charged with managing record disposal, it must be clear who is responsible and for what. Where records due for disposal have to be retained for other purposes (i.e. a legal investigation) there must be a clear protocol for indicating the requirement for a disposal hold. Specifically the IT systems must have the functionality to indicate records are not to be disposed of including. Failure to implement this type of rule and supporting system risks records required for legal purposes being destroyed and leading to potential further legal action and costs.	

**Outcomes:**

A29. A system used to track the disposal of records should retain information on the following:

- Date a record was scheduled for disposal.
- Change of disposal schedule.
- Changes to the allocated disposal schedule.
- Date and reason for the disposal schedule being paused.
- Date of destruction or transfer.

This gives the organisation confidence that even records destroyed in error can have their final status identified.

Failing to audit a record disposal could have a number of consequences. Specifically the organisation being unable to prove if the record has or has not been destroyed. The cost and possible legal implications mean that an audit trail is essential for all records in the offsite store.

A30. It may be more cost effective to pay for destruction of records at the offsite store (or by an accredited sub-contractor) rather than the organisation recalling large numbers of records and assigning its own resource to the task. Where this service is engaged the organisation must demand destruction certificates are provided for every set of records destroyed on their behalf.

External destruction of records may not always be appropriate depending on the sensitivity of records, or even the proposed cost. The organisation must be convinced that the destruction process is secure, accurate, and fully documented (including the provision of certificates).

A31. An organisation must ensure that wherever records are destroyed it is done in a secure and controlled area with limited access.

It is the responsibility of the organisation to satisfy itself that whoever is destroying the records they are capable of doing so in a suitably controlled and secure environment.

A32. Destroyed records can still potentially provide information. The method of destruction will depend on the physical format of the record, but the organisation should ensure records are destroyed beyond all use.

It is the organisations responsibility to protect records even when destroyed so that the content cannot be used by unauthorised personnel. Failure to ensure records are destroyed beyond any use could result in a significant data security problem such as breaching the Data Protection Act 1998 or other legislation.

## Specifying the Service

The provision of a managed offsite store should not always be considered as merely a remote storage location for semi-current records. Most offsite stores offer a number of extra services that allow an organisation to manage and interact with the records in a variety of ways. These range from, providing a digitised copy of a specific record held in a box of records ('scan on demand' rendering retrieval of the whole box unnecessary), to adding an item to an existing box (where that is the normal contractual unit of management).

The specification and understanding of what is likely to be needed from the *whole* offsite storage service must be clearly defined *prior* to agreeing a contract. This can help avoid over (or under) specifying the service requiring variations to the contract at significant cost to the organisation.

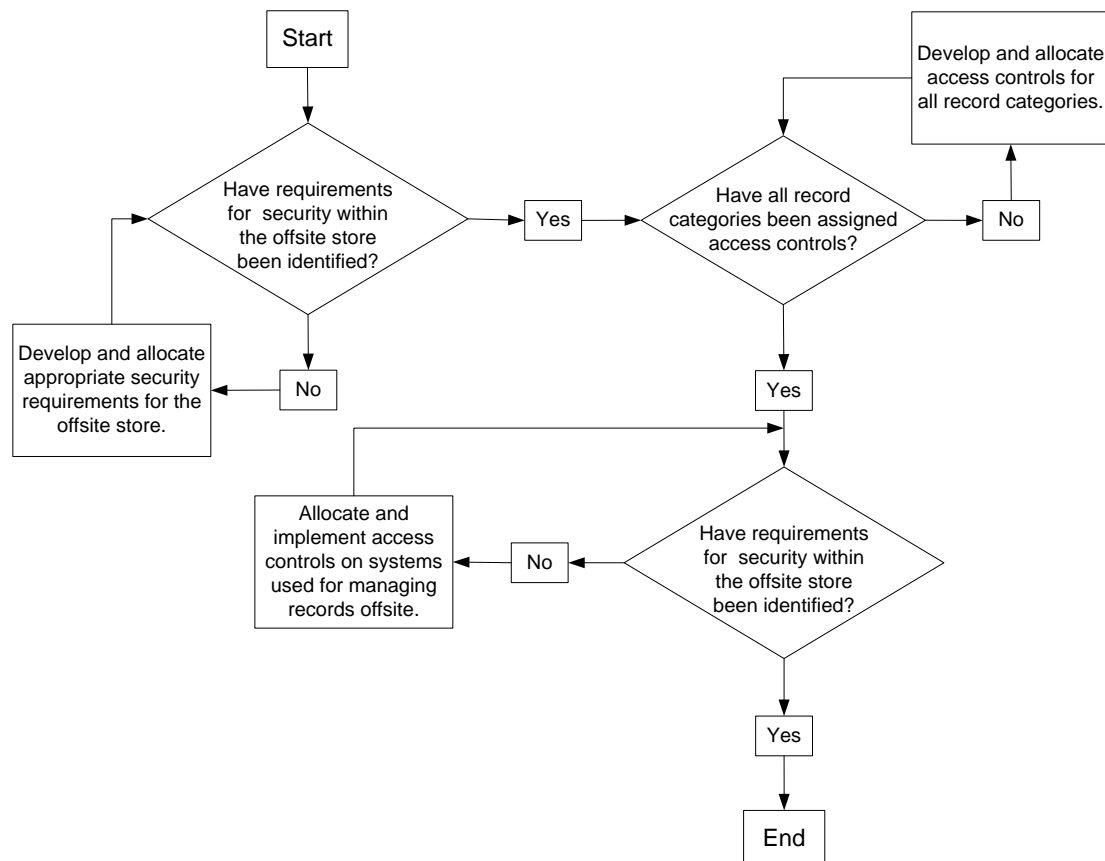
An organisation may determine that it is economically viable to enter into a shared service with another organisation. This does not obviate the organisation from ensuring that the service meets all its.

## 5. Security Management

One of the key criteria for an offsite store is security of the records. All records held offsite should be protected at all times.

Inadequately protected records could be subject to unauthorised access, theft or damage with a significant impact on the organisation. For example uncontrolled access to personal data could lead to legal action from individuals whose data has been put at risk.

### Security Management



## 5.1 Specifying the required security

An organisation should specify to the contractor the required level of security for each record category and the level of security required at the offsite store. For information on environmental protection measures see Section 9 [Environmental Conditions](#).

<p><b>No:</b> 3.0</p>	<p><b>Consideration:</b> Specify the desired physical security for the offsite store, ensuring adequate and well-maintained system of security to protect the building(s) and its contents.</p>
<p><b>Rationale:</b> The organisation must seek evidence that the offsite store and its compound are adequately protected. A breach in security may have consequences which are not easily quantified but could involve significant costs and potential legal action against the organisation. Every organisation (and the records they hold) will have varying security needs. There are, however, general precautions that apply to any offsite store. These include (but are not limited to):</p> <ul style="list-style-type: none"> <li>• CCTV Surveillance.</li> <li>• Alarms, linked to security provider and / or police.</li> <li>• All staff subject to security clearance assessment (level of security to be determined by the organisation NOT the contractor).</li> <li>• All staff and visitors carry identification to indicate the right to be on site.</li> <li>• Security access controlled across the building preventing access to sensitive areas. (Specifically when an offsite store holds more than one organisation's records).</li> <li>• A secure perimeter, including robust fencing.</li> <li>• Site location (i.e. not a remote site or placed in an area of high crime).</li> <li>• Any device capable of taking photos such as mobile phones or cameras surrender prior to entry?</li> </ul> <p>If the offsite store is not adequately protected the organisation may be subject to a data security breach.</p>	
<p><b>Questions:</b> Q33. Has the organisation formed a brief on the level of security required at the offsite store? Q34. Does the site have functioning, monitored CCTV and alarm systems? Q35. Is security vetting performed for all staff working on the site? Q36. Is the site, and its function, obvious to the general public?</p>	
<p><b>Outcomes:</b> A33. A contractor must provide evidence it can meet <i>all</i> the security measures specified by the organisation. In order to satisfy themselves that the proposed site is suitable the organisation should visit it prior to agreeing sending its records there.</p>	

**Outcomes:**

A34. Functioning and monitored CCTV provides excellent support in detecting and preventing attempted theft or vandalism.

The organisation will need to carefully consider the locations of CCTV both outside and inside the building(s) to ensure adequate coverage. Additionally it will also need to consult with the contractor about frequency of recording to avoid amassing large numbers of CCTV tapes.

Additionally the offsite store should be equipped with a functioning and monitored alarm system (linked to either a security company and / or local police). As unauthorised access may occur when there are no, or very small numbers of staff onsite, it is vital that an alarm can be raised at all times. If alarm systems are not available (or monitored and maintained) there may be no means of indicating a breach in security within the offsite store.

A35. An organisation will need to ensure all personnel accessing the site have passed appropriate security vetting. The level and nature of the vetting may vary between the expected levels of access and user role but *must* be determined *prior* to allowing records to be stored at the site.

It is the organisation's responsibility to ensure all staff working with the records held offsite are appropriately vetted, and that the contractor can provide relevant certificates for their staff on request.

If the organisation does not vet (or insist the contractor provide evidence it has vetted) users of the site it be certain that unauthorised access to their records could be taking place.

A36. Offsite storage providers would normally not advertise their locations that hold very sensitive information. Depending on the organisation's need, in consultation with a contractor, there must be a decision on how visible the offsite store's function is (i.e. the contractor has a business sign on the outside of the building or not).

If the offsite store's function is too obvious / advertised the organisation's records could be at risk from opportunistic criminal activity, possibly resulting in damage or theft of records.

<b>No:</b> 3.1	<p><b>Consideration:</b></p> <p>Determine and assign levels of access to all record categories held within the offsite store.</p>
<p><b>Rationale:</b></p> <p>It may not be appropriate for the contractor (or other users within an organisation) to have access to all categories of record (or individual records within a category). The electronic systems used to manage records in the offsite store must be able to indicate the specific access controls for record categories, and where as appropriate individual records.</p> <p>It is crucial the organisation place access controls on record categories to prevent unauthorised access to records. If this is not in place the contractor will not be able to control access to records when under their control.</p>	
<p><b>Questions:</b></p> <p>Q37. Does each record category have specified access controls?</p> <p>Q38. Are there individual records that require more specific access controls than that of their record category?</p> <p>Q39. Who will manage the access controls of the records?</p>	
<p><b>Outcomes:</b></p> <p>A37. By detailing the access controls for record categories the organisation can indicate who is allowed to retrieve which records. The contractor can use this information to help manage access to records.</p> <p>If record categories do not have clear access controls then the contractor (and supporting systems) will not be able to prevent unauthorised access and data security breaches.</p> <p>A38. Some records may need to be protected beyond the access control of the record category. Whilst individually allocated access controls should be avoided as far as possible, it may be required. Wherever this occurs the same principles must be applied to ensure consistent use and management of the records.</p> <p>As with A37, if access controls are not effectively managed then the contractor cannot help ensure only authorised access to records is granted to records held offsite.</p> <p>A39. Access controls may not remain constant throughout the life of a record. As records get older their sensitivity may change and the need for wider access provided (or restricted). The organisation must ensure that it regularly reviews allocated access controls for record categories to ensure they are usable and accurate.</p> <p>If the incorrect access control is applied records may not be managed properly potentially leading:</p> <ul style="list-style-type: none"> <li>• Inappropriate access being granted.</li> <li>• Wrongful prevention of access to requested information under Freedom of Information Act 2000.</li> </ul>	

## 5.2 Active management of security to electronic systems.

Once the organisation has been able to identify its security and access needs it must ensure that all aspects of it are actively managed at all times.

Failure to ensure active management is in place could result in a serious data security breach leading to loss or misuse of the organisation's information.

<b>No:</b> 3.2	<b>Consideration:</b> Determine and assign levels of security access to any electronic system that provides information on the content of the records.
<b>Rationale:</b> It may not be appropriate for the contractor (or other users within an organisation) to have access to information about a record's content. It is crucial that the organisation can implement controls preventing access to data via the systems used to manage records to unauthorised staff / contractors. An organisation may need more formal levels of auditable security in the electronic systems such as BS ISO/IEC 27002:2005 <i>Information technology. Security techniques. Code of practice for information security management</i> . This standard will provide a level of security that is independently auditable. Central government departments will also have to consider CESG requirements as well as the Cabinet Office's " <i>Manual of Protective Security</i> " which actively prescribes methods of storage for records marked with Government Security Classifications (i.e. Confidential" or "Secret"). If this is not done then unauthorised personnel may be able to determine sensitive information about records held in the offsite store.	
<b>Questions:</b> Q40. Can the record tracking system define and maintain user permissions to control access to records, their content or informative metadata? Q41. Who will manage the security of the electronic systems?	
<b>Outcomes:</b> A40. Any system that provides access to an organisation's information should have a means of controlling that access. The organisation should insist that any record tracking system provide any set of access controls as appropriate to record categories, individual records (where required) and the systems that provide metadata for them (i.e. the tracking systems). This may be done via integration with other systems or as an individual function of the tracking systems used. However the solution is achieved it must be accurate and reflect the current security controls within the organisation itself. A41. The organisation will need to clearly identify and agree who is responsible for managing the access controls in a record tracking system. This must include means of identifying and reporting attempted breaches and a full audit trail of the attempt. Proactive management of security will allow the organisation to be aware of persistent attempts to access information that is controlled. It will also ensure the systems are always protected and reflect the current security need. Failure to manage access controls risks unauthorised access to information and content, with potential for theft and / or misuse.	

## 6. Access and Retrieval of Records

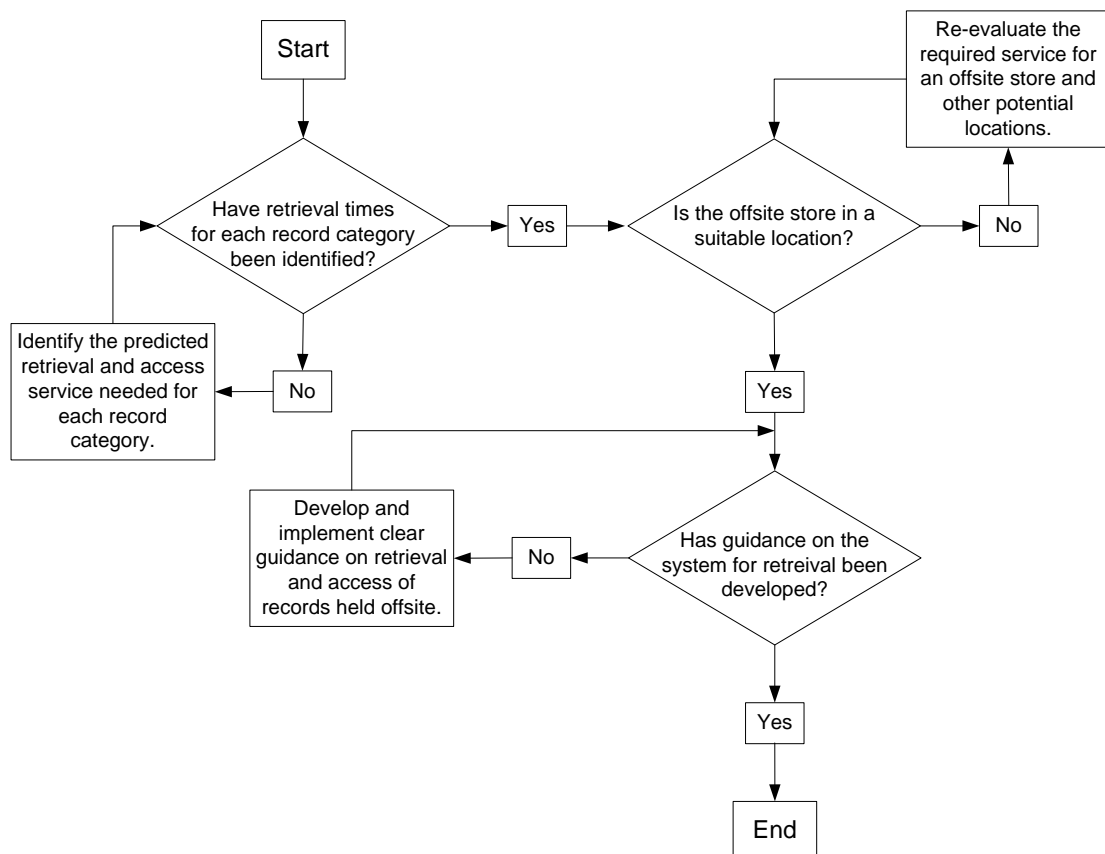
The success of investing in an offsite store relies on how well the organisation can effectively interact with the store once the operation is in place. In particular, consideration must be given to the many factors that can impact the efficiency of access and retrieval with an offsite store.

If the organisation does not properly determine the expected level of service from an offsite store, a contractor cannot provide the desired level of service to all areas of the organisation. The key issues include (but are not limited to):

- Unit of management for access and retrieval (box of records, or individual records).
- Number of users requiring access to the stored materials.
- Expected delivery timescales, and frequency for every record category.
- Anticipated the volumes of retrieval requests.

In order to ensure secure and effective business operations, it is vital that the anticipated access and retrieval requirements are thoroughly investigated and understood within all areas of the organisation. This approach will highlight potential problems at an early stage and will help ensure access material in the appropriate manner within the required timescale.

### Access and Retrieval



## 6.1 Identifying Patterns of Use

Understanding how often categories of records are likely to be requested is vital when deciding which records to store offsite. By identifying the business patterns, an organisation may also be able to decide whether or not there may be some record categories that should remain on-site rather than go to an offsite store.

<b>No:</b> 4.0	<p><b>Consideration:</b></p> <p>Define and allocate retrieval times for each record category, or groups of record categories.</p>
<p><b>Rationale:</b></p> <p>In order to provide an efficient means of accessing and retrieving records the organisation should provide a schedule for retrieval times to the contractor in consultation with the potential users of the service. The organisation will also have to give thought as to how users request records from the offsite store and the specified unit of management (i.e. individual records or box of records). Specifically will users interact directly with the service or via an “in-house” ordering process? Both options have benefits, direct access giving quicker retrieval requests, managed access by an access team providing greater control of the use and management of the offsite store.</p> <p>If there is no input on retrieval times or the unit of management is inappropriate there is a risk that the retrieval service will not meet business need causing user dissatisfaction and leading to the system being used inappropriately.</p> <p>Whatever the determined retrieval services they must not impede or prevent complying with statutory timescales for responses to requests under the Freedom of Information Act 2000 or Data Protection Act 1998.</p> <p>It should be noted that access to records may not be restricted to the organisation’s staff and there must be protocols in place to allow authorised external users (i.e. Audit bodies) to request and access records held offsite.</p>	
<p><b>Questions:</b></p> <p>Q42. Do users require specific retrieval services for certain categories of record?</p> <p>Q43. Are their record categories that can be grouped in terms of need for retrieval and access?</p> <p>Q44. Have record categories that require priority retrieval been identified?</p> <p>Q45. Are there categories of record that could be produced by reproduction of a surrogate?</p>	
<p><b>Outcomes:</b></p> <p>A42. The organisation should include user consultation when defining retrieval services for record categories (i.e. the preferred unit of management and retrieval time). Whilst it should not rely solely on this information, the organisation may find users engage with the offsite store more productively where their requirements are accounted for.</p> <p>An objective assessment must be made before specifying retrieval times to ensure best value for money and avoiding a proliferation of bespoke retrieval services.</p>	

**Outcomes:**

- A43. It would be impractical for an organisation to allocate individual retrieval times for each record category. The organisation should identify those record categories that require a similar retrieval service and allocate that service over as broad a range of records as is practical. This will provide a contractor with a manageable number of delivery schedules.
- In some cases it may be possible to determine access and usage from previous trends either with another offsite store or an internal record storage service. If available this data could provide a very efficient means of establishing retrieval service need.
- If the record categories are not assigned specific retrieval times the contractor may process requests under a standard retrieval time, which may not meet user need.
- A44. Some record categories may demand fast (or emergency) retrieval times. Where identified, the organisation must provide a retrieval time to the contractor detailing which record categories are eligible for a faster service (and who can use it).
- Where used, the organisation may need to consider establishing an internal charging regime to control costs by discouraging users from using the service for routine file requests.
- This means the organisation needs to be able to monitor the pattern and pace of retrieval to review and identify changes in business need. Section 10 [Auditing and Reporting](#) discusses monitoring usage patterns in more detail.
- A45. Another means of providing records to users quickly is through the production of surrogates. This may be through scanning the record or if appropriate faxing a copy to the requestor.
- This is of particular value where the record is fragile or in high demand. Production of surrogates must be carefully controlled by business rules. When no longer required the surrogate must be destroyed and not returned to the offsite store as a new record.
- If not carefully controlled there is a significant risk that the record will be held in duplicate offsite for no reason and at extra cost to the organisation.

<b>No: 4.1</b>	<p><b>Consideration:</b></p> <p>Identify and estimate current or anticipated level of demand for access for each category of record.</p>
<p><b>Rationale:</b></p> <p>It is possible that every category of record will have a different level of use. For example, a record used in a particular court case may only ever be called upon once during the trial period, then simply stored for the legally required period. Conversely records used in a lengthy building project may be recalled and used more frequently, even after the project has been completed.</p> <p>The organisation must establish the likely level of use for all record categories to determine their anticipated level of retrievals. This approach allows the organisation to assess the current operating model, and provide an opportunity to identify potential changes that could lead to improvements and operational efficiency savings.</p> <p>Once the offsite store has been set up there will need to be an ongoing assessment of patterns of use to ensure that the terms of retrieval are accurate, and if not the means for addressing this with the users and / or contractor.</p> <p>This places an additional requirement on the organisation to ensure that the contract with the offsite store has some flexibility with respect to increasing or decreasing planned levels of retrieval.</p>	
<p><b>Questions:</b></p> <p>Q46. Has a pattern of use been identified for all record categories?</p> <p>Q47. Will the contractor be able to manage periods of high usage during pre-identified busy periods or seasons to maintain the required retrieval times?</p> <p>Q48. Are there likely to be regular uplifts (small or large) to the offsite store post-implementation?</p>	
<p><b>Outcomes:</b></p> <p>A46. Understanding the common use of a record category will help form the retrieval time priorities. If applied correctly this approach can establish a common set of retrieval times for all business units.</p> <p>If the patterns of use are not properly assessed or the data is not available, the organisation will have to ensure it discusses the potential access need with users in detail <i>prior</i> to assigning a retrieval time to category of record.</p> <p>The organisation should also develop a plan of regular (i.e. quarterly or annual) assessments on the pattern of use for each category of record to ensure that the agreed service level still meets the business need and is not leading to excess costs for unwanted retrieval services or impeding business units by unnecessarily restricting access to records.</p>	

**Outcomes:**

A47. The organisation must ensure that any potential contractor can cope with periodic large transfer in or out of the offsite store. For example, during the processing of year end financial papers.

It is crucial that the organisation can satisfy itself that the contractor is able to cope with known increased usage levels and can provide assurances of their ability to respond to anticipated fluctuations in demand.

If the contractor is unable to support an identified pattern of use it is likely that any significant influx could overwhelm unprepared staff and increase the risk that records will not be properly tracked

A48. In addition to predicted increased use of the offsite store, the organisation may be aware of other future activity that could present a management issue for the offsite store. For example if a business unit is to be closed and all its records need to be held prior to disposal.

It is extremely useful for the contractor to have this type of information in advance, even if an exact date of for the uplift is undecided to cost (and allow for) the expected increased volume.

If this information is not provided to a contractor it could result in a period of delay in function at the offsite store, as well as a significant excess charge from the contractor for uplift.

The same principles should be applied if the organisation in conjunction with the contractor has to relocate to another site (either to a larger facility or smaller depending on need). If the records are to be relocated en masse the systems used to rack the move should be robust enough to cope.

## 6.2 Establishing the Offsite Store's Location

The geographic location of an offsite store can affect the ability to retrieve physical records in a timely manner required by the business needs of an organisation.

If an offsite store is unable to provide the required level of service, it will impact negatively on business operations including failure to provide information in mandated timeframes under legislation such as The Freedom of Information Act 2000.

<b>No:</b> 4.2	<p><b>Consideration:</b></p> <p>Compare required retrieval service levels against the geographic location of a proposed offsite store.</p>
<p><b>Rationale:</b></p> <p>When generating the specification for an offsite store the organisation must identify the required retrieval timeframe(s) for each record category to be stored. Just as it is important that the contractor is fully aware of the anticipated business needs <i>prior</i> to agreeing any contract.</p> <p>Careful consideration must be given to the benefits and risks of storing records in locations close to, and further from, the organisation's own site(s).</p> <p>Ultimately an offsite store has to be located so that it will successfully fulfil the required retrieval times; including any fast retrieval times agreed.</p> <p>The manner in which retrieval is conducted may vary depending upon each individual contract; however, it should meet the agreed terms of the contract.</p>	
<p><b>Questions:</b></p> <p>Q49. Can the proposed location support the required retrieval times (2 hours, half-day, next day etc.)?</p> <p>Q50. Will a secondary location be required for frequently requested record categories?</p> <p>Q51. Are there alternative routes to and from the offsite store that avoid significant delays in traffic at peak times?</p>	
<p><b>Outcomes:</b></p> <p>A49. In order to operate in an effective manner, an organisation must be able to retrieve records from an offsite store in a timely manner dependant on business need. For example, some record categories may require very short / emergency retrieval times due to the urgent nature of the associated business processes; others may only require a next day service.</p> <p>Where subject to specific jurisdictions, the organisation should avoid storing records outside that area. For example:</p> <ul style="list-style-type: none"> <li>• Records subject to the Public Record Act should not be stored outside the UK.</li> <li>• Records that contain personal data should not be stored outside the European Union.</li> </ul>	

**Outcomes:**

A50. Where there is the option to store material in more than one location, an organisation may find it preferable to keep regularly accessed, high-demand records closer to their office(s), while material that is accessed less frequently may be stored further away in bulk (or palletised) storage. A well-managed storage network may provide a balanced cost approach, especially where a secondary store is rarely accessed.

The use of multiple storage locations must be properly assessed, as there may be additional risks. Clear procedures and specifications must be in place to ensure records are always stored in the correct location; to prevent records being mixed up or even lost.

A51. It is important that the means of retrieving records is not unduly impeded by external issues. The storage contractor should be able to demonstrate how it might tackle known issues, such as rush-hour traffic or long-term road works that may significantly affect retrieval times. The organisation should identify any specific company or geographic issues that can be addressed, such as delivering records to a remote or hard to access locations.

If records cannot be retrieved or accessed in a contracted timeframe with the organisation's users there is a significant risk that the offsite store will not be used

## 6.3 Guidance on Access and Retrieval

Ensuring end-users are aware of best practice will “make or break” the use of an offsite store.

<b>No:</b> 4.3	<b>Consideration:</b> Develop and maintain clear guidance on how to request records from the offsite store.
<b>Rationale:</b> Users must be given clear guidance and training on all aspects of the offsite store in order that the records can be properly accessed and maintained. It is vital that all users understand the process for requesting records from the offsite store to ensure the operation remains effective. Guidance should be presented clearly and without jargon so all users can understand it. The guidance should be regularly reviewed to ensure its continued effectiveness. Bodies subject to legislation such as the Freedom of Information Act 2000 should include specific guidance on recalling information held offsite.	
<b>Questions:</b> Q52. Will the organisation produce guidance on use of the offsite store? Q53. Will sufficient training be available for staff regarding use of the offsite store (and supporting systems)? Q54. Will there be resource to ensure that the guidance and training are maintained and up to date?	
<b>Outcomes:</b> A52. The success of an offsite store is based on how well users understand its purpose. This can be clearly communicated through guidance and training to support users as they learn how the process should work. If guidance is not prepared users will be unlikely to engage in the correct use of the offsite store leading to excess costs correcting user errors. In addition users may simply not use the offsite store leading to more significant record management issues and costs. A53. As well as written advice, users will need training on how to request and send away records. The training will need to provide detailed explanations of systems used to track the records in and out of the offsite store (and any other location they may go to). If users are not suitably trained in the use of the supporting systems it could lead to expensive failures in the system. It could also lead to records becoming lost or misdirected through a lack of knowledge of the tracking systems used. A54. As the business changes and evolves the use of the offsite store supporting guidance and training should be updated to reflect new ways of working. Guidance and training is only valuable if it reflects the current working environment. The organisation should ensure that all guidance and training is kept up to date and relevant to the users.	

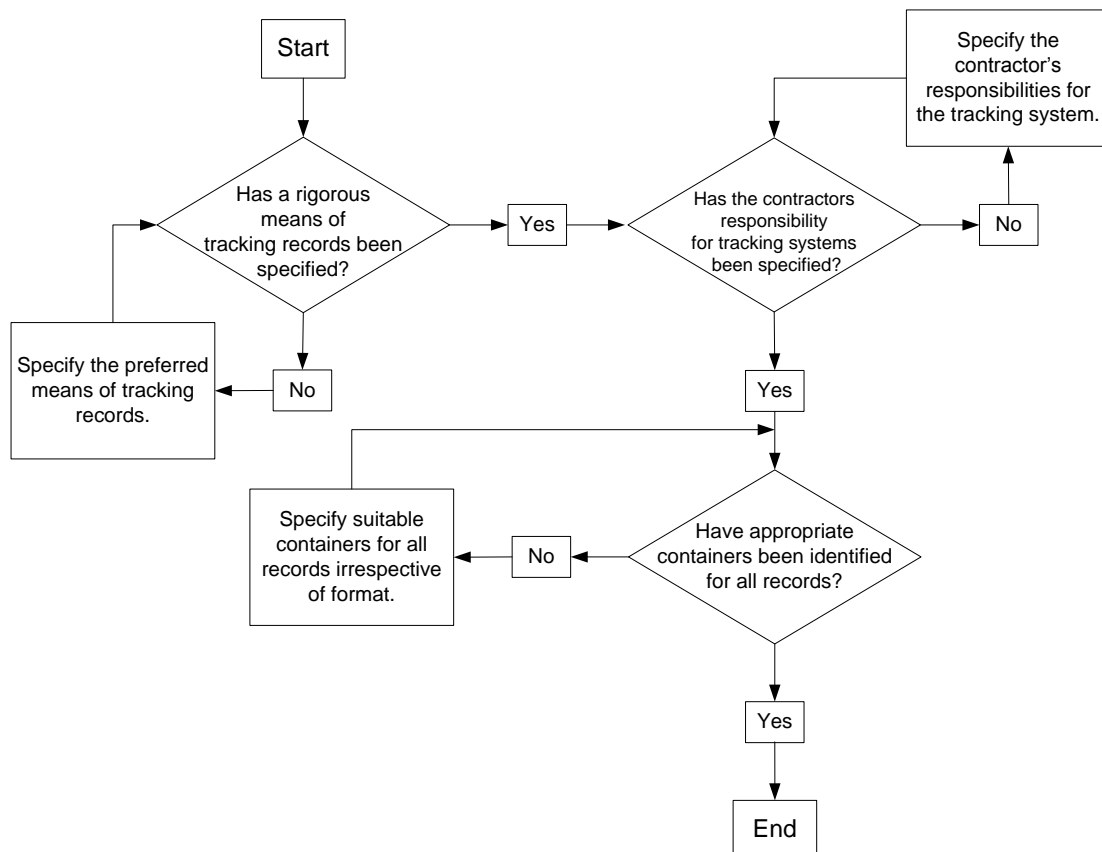
## 7. Transport of Records

There is a wide range of electronic systems available to provide a secure tracking of records. This document does not prescribe a type of system nor who should maintain it. The key aspect for a tracking system is that it is robust, secure, accurate and maintained throughout (and beyond) the life of a contract with an offsite store. Whatever product is chosen it should as a *minimum* provide information on and help manage the following:

- Current location of the record
- Disposal schedule
- Owner
- Access controls

Records are vulnerable to damage and loss when being transported. An organisation must be certain that whenever records are moved they are kept secure from loss or damage. The potential cost to an organisation for lost or irreparably damaged records is not always calculable purely as a monetary cost.

### Transport of Records



## 7.1 Tracking the Records

Whenever a record moves it must be tracked. If knowledge of a record's location is not available the organisation may be subject to a significant loss of data and / or security breaches.

Whilst this section deals with the tracking of records to and from the offsite store, the organisation must ensure that it is able to track the movement of retrieved records within its own business areas. This may be done using the same systems as the offsite store, if not then the internal system must be able to interface with that of the offsite store so that records can always be found.

<b>No:</b> 5.0	<p><b>Consideration:</b> Specify a rigorous means of tracking and managing records wherever they are transported to.</p>
<p><b>Rationale:</b> Being able to locate all records is a key to the successful management of an offsite store. The most robust means of tracking records is through the use of barcodes generated by the tracking system. These can be scanned by hand held devices, or scanners attached to designated PCs and provide a simple means of registering file movements even by users with limited technical experience. The organisation must be able to effectively track all movement of records to and from the offsite store, and elsewhere within its own sites. Whenever records are transported the tracking systems must securely monitor movement throughout the complete transportation.</p>	
<p><b>Questions:</b> Q55. Has the organisation articulated its requirements for a tracking system? Q56. Can the tracking system maintain key record management information? Q57. Is the tracking system auditable? Q58. Is the tracking system robust? Q59. Is the tracking system secure? Q60. Do records (or boxes containing records) have significant information with them to identify them if lost?</p>	
<p><b>Outcomes:</b> A55. The organisation must be clear of its needs prior to assessing the supplier's proposed system, or to purchasing a tracking system of its own. If an organisation is unclear as to its specific needs it may purchase an unsuitable system resulting in potential mismanagement of records and a failing in the service. A56. Any tracking system will need to be able to manage a significant level of transfers to and from the offsite store. The organisation should seek evidence that a system has the capability to manage the expected volume of management data.</p>	

**Outcomes:**

A57. Systems used for tracking records should not be considered solely as transaction recording devices. As well as knowing when / where a record has moved, other information should also be retained along with the record's current location. This includes, but is not limited to:

- Title.
- Category of record
- Creator.
- Responsible Business Unit.
- Date of Creation.
- Access permissions.
- Security classification (where applicable).
- Allocated Disposal Schedule (due date).

An organisation should undertake to identify *all* the information it requires (e.g. workflow information) from a tracking system *prior* to purchasing a system.

A58. In order to provide clear evidence on the movement of records a system should retain a full record of the following:

- Previous, current and intended location.
- Changes to metadata (i.e. disposal schedules, access controls).
- Names of users requesting the file.
- Date requested, received, or moved.

This information is not a substitute for an established "hand over" policy in terms of establishing who is responsible for records when. It will, however, help the organisation establish the intended movements of records if they become lost.

A59. Some organisations may need to control access to records from users and contractor staff. Where this is required the organisation must insist the system is able to provide adequate access controls.

If security is compromised the system should be able to provide a supporting audit trail to identify where unauthorised personnel accessed (requested) a record.

A60. In addition to the barcode that identifies a record, or box containing records, it is sensible that other key information regarding the record(s) is attached to them. This should include, but is not limited to:

- Title.
- Creator.
- Responsible Business Unit.
- Date of Creation.
- Security classification (where applicable).
- Disposal Schedule.

<b>No: 5.1</b>	<p><b>Consideration:</b></p> <p>Specify how the contractor must take part in the active management of any system for tracking and managing all records in their custody (irrespective of who owns the systems used).</p>
<p><b>Rationale:</b></p> <p>The movement and transport of records is the primary function of the contractor. It is important, therefore, they maintain the correct processes in terms of use and managing the systems used to track records. The organisation should ensure the contractor would honour this obligation as part of the signed contract documentation.</p> <p>Failure by a contractor to ensure systems are well maintained could lead to a failure in delivery of service. For example, users are engaged in search and discovery projects where an inability to locate information via tracking system could have a significant impact on the ability to retrieve relevant information.</p>	
<p><b>Questions:</b></p> <p>Q61. Who will own overall responsibility for the record tracking system?</p> <p>Q62. Who will maintain the record tracking system?</p> <p>Q63. Does the contract agreement detail the responsibilities of the contractor for managing record tracking systems?</p>	
<p><b>Outcomes:</b></p> <p>A61. Before any products are bought or supplied (whether stand alone or integrated with existing IT infrastructures) an organisation must identify who is to have overall control and responsibility of a record tracking system.</p> <p>Whilst it is not necessary for the organisation to physically own the systems they must ensure they retain full controlling ownership over the product's development. This is principally so that the organisation can assure the systems remains viable and the data contained within it can be exported in a usable format at all times.</p> <p>A62. As with ownership, responsibility for maintaining record tracking systems is key to the success of an offsite store. Ideally the monitoring of a file tracking system should be conducted by people with significant experience in using and managing such systems.</p> <p>A63. It is possible that a selected contractor will provide a suitable record tracking system. In such cases it is crucial the organisation ensure that the product will be supported throughout the contract (and not be subject to unnecessary upgrading every 2 years or so).</p> <p>Where the contractor is the owner of a system there must be an agreement on their part that it be fully maintained by them (or a potential authorised third party). In addition they must demonstrate that it is capable of managing a bulk export of information at the end of the contract, see Section 11 <a href="#">Exit Strategy</a>.</p> <p>An organisation may choose another system for tracking records. In which case they will need to ensure adequate training in the correct use of the system is provided to the contractor.</p>	

## 7.2 Custody and Care of Records in Transit

An organisation must set boundaries with a contractor regarding levels of responsibility for the records whilst they are in transit. Care of records, does not confer ownership of the content of the records as this remains with the organisation at all times.

<b>No:</b> 5.2	<b>Consideration:</b> Establish who is responsible for records and the movement of them throughout their transfer to offsite (and any potential returns).
<b>Rationale:</b> An offsite store may see significant movements of records on a frequent basis. As well as robust logistic systems, it is imperative that an organisation establishes custodial liability for records. With any transport of records loss or damage is a possibility. Both the organisation and contractor must have clearly stated responsibilities for records whilst in their custody with agreed policies for incident reporting. Responsibility and custody in this context does not mean that when held offsite the organisation is not responsible for its information. The organisation will <i>always</i> have a responsibility to ensure that records are cared for and managed on their behalf in the correct manner at all times.	
<b>Questions:</b> Q64. Has the organisation articulated the extent of a contractor's liability for records when in their (the contractor's) custody? Q65. Has the organisation defined a process for identifying "transfer of custody" for records between the contractor and themselves? Q66. Will the contractor have a process for reporting lost or damaged records whilst in their custody? Q67. Can the contractor provide a suitable compensation process for records lost or damaged by them?	
<b>Outcomes:</b> A64. It should never be assumed that a contractor understands when they are responsible for an organisation's records. Establishing a contractor's responsibility for records will enable the organisation to develop a productive relationship in the use of the offsite store. Failure to establish responsibility <i>prior</i> to agreeing a contract may result in no claim against a contractor when records are in their custody. A65. There are many ways an organisation may choose to log records as "received" depending on the scale of use, budget, and size of the organisation. For example, the organisation may receive records in a central location (e.g. the post room) and distribute the records internally. As custody of records takes place at that point they can ensure a more direct control of when exactly records were sent / received. An organisation may require multiple delivery locations, in which case it must ensure that the systems and procedures are robust enough to ensure consistent and accurate tracking of records.	

**Outcomes:**

A66. Damage or loss of records must be reported so that action can be taken to resolve the issue. Even if it is the contractor who repairs records in their custody, the incident must still be recorded. In particular the detail of the damage or loss, how, and when it occurred.

This may help an organisation to identify any patterns of poor record handling either internally or by the contractor. A robust tracking system should indicate where the record was last used / held, but must be actively managed to highlight incidents of loss.

The organisation will always retain full responsibility for its information and any loss will be considered as their responsibility for failing to ensure the contractor was capable of performing the contracted service.

A67. Compensation is a problematic area, under contract law there is no expectation that punitive fines will be permitted. Traditionally the law will only permit liquidated damages and these are likely to be limited.

Any claim for compensation will itself have to be founded on an analysis of what would be the financial cost to the organisation if a record or group of records are lost or damaged. If that can be quantified it may be possible to seek for evidence that the contractor possesses appropriate liability insurance which could be the source of recovered costs.

Additionally the loss of information however significant is likely to cause issues that cannot be repaired by money alone. Lost information can severely impact operational effectiveness and potentially damage the organisation's reputation.

It is strongly recommended that the organisation confers with its procurement specialists and legal advisers before enshrining any requirement for compensation within its specification.

<b>No: 5.3</b>	<p><b>Consideration:</b></p> <p>Identify suitable containers for all record categories to protect them from damage during all parts of transit.</p>
<p><b>Rationale:</b></p> <p>Movement of records in unsuitable containers (i.e. postal sacks) is almost certain to cause damage to records and the organisation must ensure that the containers for transporting records are adequate for the task.</p> <p>This document does not presume the exact type of container suitable for every record. The container must, however, as a minimum provide room for the records as well as protection from damage in transit.</p> <p>Especially fragile or delicate records, for example glass plate negatives or laboratory specimen slides may be too susceptible to damage to be moved on a frequent basis. The organisation needs to identify these records and consider how best they should be made available to users. In some circumstances it may be preferable to provide a digital surrogate of a fragile record rather than provide the original.</p>	
<p><b>Questions:</b></p> <p>Q68. Has the organisation identified suitable containers for all records categories?</p> <p>Q69. Will the organisation delegate responsibility for sourcing of containers to the contractor?</p> <p>Q70. Are there record categories that require special procedures or equipment for moving and handling?</p>	
<p><b>Outcomes:</b></p> <p>A68. An organisation may only have paper records in A4 format stored in standard archive boxes transporting these correctly will be relatively straightforward.</p> <p>Other records may vary significantly in size, shape, and weight, and it is important that the thought is given on how to transport them rather than apply a single solution. Improperly protected records may become irreparably damaged which could be costly to the organisation.</p> <p>A69. The contractor is likely to have significant experience in the transporting of records and may be able to provide / source suitable containers for transporting physical records.</p> <p>It should be noted, however, that the organisation should always retain the right to insist on the means of transporting all its records.</p> <p>A70. If an organisation has categories of record that are fragile or out-sized it must pay close attention to how they are handled and transported. There must be adequate training on how to handle and transport such records including instruction on the correct use of specialised transport equipment (e.g.. scissor trolleys, bespoke carry cases)</p> <p>Any particular requirements must be detailed to the contractor to avoid vulnerable records becoming damaged and deteriorate beyond repair. See section 6.1 <a href="#">Identifying Patterns of Use</a> for detail on creation of surrogate records</p>	

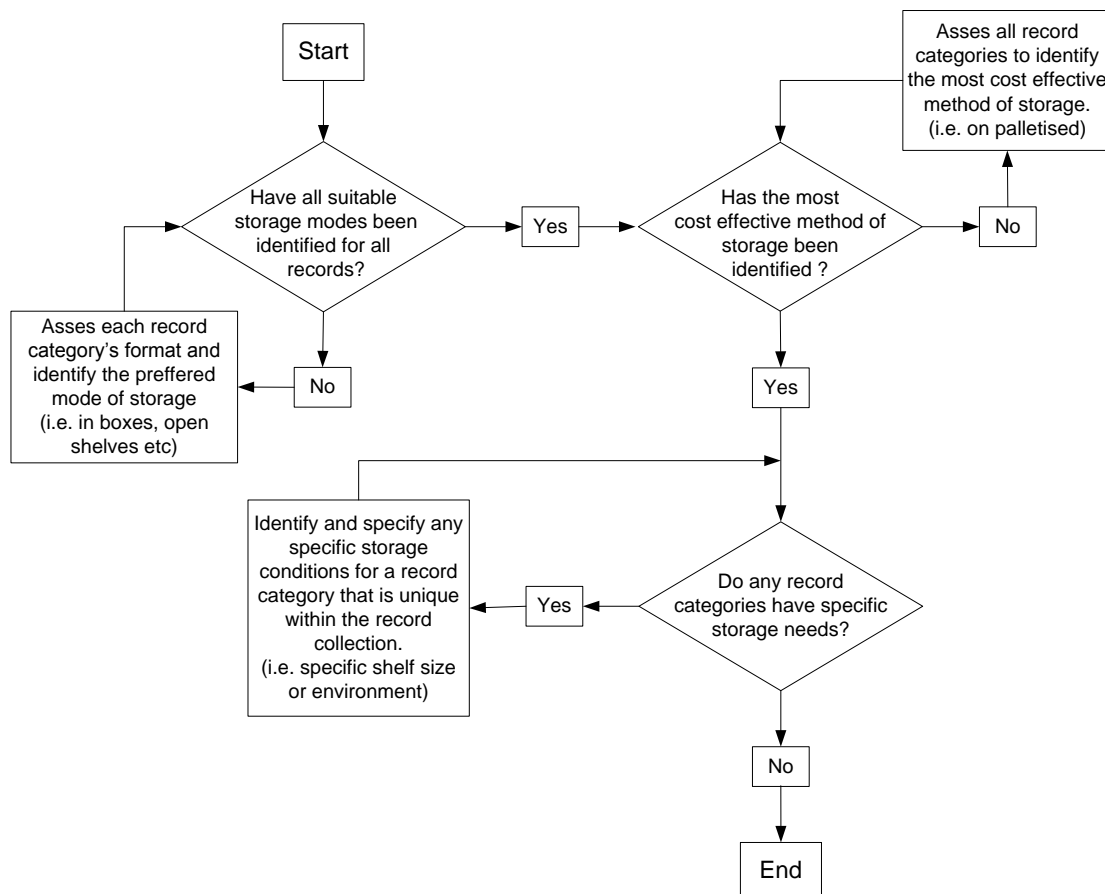
## 8. Modes of Storage

Not all physical records can be stored in the same way and must be carefully assessed during the process of specifying the offsite store. Careful attention should be paid to the dimensions and weight of the records with regard to the type of shelving required. For example large plans or maps should be stored flat but other paper records maybe stored in a file on their side or in a box.

There may also be a need to store very specialised or fragile records, such as scientific specimens which will need very specific storage and must be assessed prior to sending offsite, particularly if they require specific environmental conditions.

Before a contract is agreed, the organisation must be certain that the contractor can provide the correct mode(s) of storage. Failure to correctly store records could result in significant damage to records leading to them being unusable by the organisation.

### Modes of Storage



## 8.1 Assessing Modes of Storage

Understanding how each record category will need to be stored is vital if records are to be adequately protected whilst in an offsite store

<b>No:</b> 6.0	<b>Consideration:</b> Assess each record category to establish the most practical means of storage for them.
<b>Rationale:</b> Storing records offsite can become very expensive when the correct mode of storage is not considered. Because the needs of categories of records may vary greatly it is important that they are all stored in a suitable manner. For example where shelves may be suitable for boxes of paper records they may not be suitable for heavy physical objects such as geological samples.	
<b>Questions:</b> Q71. Do all record categories require the same mode of storage? Q72. Can the proposed offsite store provide the required mode of storage for all record categories? Q73. Where used, are boxes (or containers) for records a suitable size and strong enough to protect the contents from damage during transport and storage?	
<b>Outcomes:</b> A71. An organisation may have physical records in one, or very similar, format(s) (i.e. A4 paper records). In such cases it will be relatively easy to specify a common mode of storage usually sturdy boxes that ensures the records are stored safely and efficiently. Where a wider variety of record formats exist the specific storage needs (including specialised storage furniture) must be identified and articulated to the contractor to reduce the risk of records becoming damaged or destroyed. A72. If organisation is not absolutely confident that the contractor can provide the correct mode of storage it will have to seek alternative solutions for records that cannot be housed in the offsite store, or potentially seek a specialised storage contractor. A73. Storing records in boxes does not guarantee their safety. If the box is too large, movement inside when being transported could cause damage to contents. If the box is too small records can be bent, folded or otherwise fitted in an inappropriate manner leading to damage. The organisation must ensure the correct size box / container is used to store records to reduce the risk of damage, this should include assessing how many boxes can be safely stacked on top of each other.	

<b>No:</b> 6.1	<p><b>Consideration:</b></p> <p>Assess each record category to establish the most cost effective method of storage.</p>
<p><b>Rationale:</b></p> <p>The needs of each record category may vary greatly and it is important that they are all stored in a suitable manner.</p> <p>For example where surrogate copies of records are available to the users (e.g. microfilm or scanned images) it may be more cost effective to either destroy the originals, or if they are still required, to choose a more cost effective mode of storage such as bulk (palletised) storage.</p>	
<p><b>Questions:</b></p> <p>Q74. Can the organisation quantify the volume of records likely to be frequently recalled?</p> <p>Q75. Are there categories of record that could be stored in bulk (palletised) and left until due for review or destruction?</p> <p>Q76. Are surrogate copies of records available in a more accessible format (e.g. microfilm or scanned images)?</p>	
<p><b>Outcomes:</b></p> <p>A74. The frequency of use for record categories should be used to define their access and retrieval requirements. This information will help inform the most suitable type of storage for a record category. Frequently requested records should be more accessible so they can be removed and replaced with minimal opportunity for damage.</p> <p>If the mode of storage is not accessible there is a risk that although well protected whilst stored, the records are damaged when moved.</p> <p>A75. Where a record category will not need to be accessed for a long period, it may be stored in bulk on pallets. Whilst retrieval charges from pallets are likely to be higher than standard rates this method may be attractive for records that are almost certainly not required until due for review or disposal owing to the reduced handling costs by not having to shelve material and index the records and / or boxes individually.</p> <p>A76. Some records may have a surrogate digital copy created (adequately protected and preserved) potentially saving the organisation significant costs in retrieving records for minor administrative or reference purposes. This solution may also be used for large or vulnerable records in order to reduce the risk of damage.</p> <p>Where the creation of surrogates occurs, the organisation should consider using standards such as BIP 0008-1: 2004 <i>Code of practice for legal admissibility and evidential weight of information stored electronically</i> to ensure a consistent quality in surrogate production. This does not mean to indicate that an organisation should embark on a wholesale scanning of records prior to sending them offsite.</p> <p>Scanning projects are a significant undertaking and should be subject to a cost benefit analysis first, including the cost of preserving digital surrogates of records.</p>	

## 8.2 Vulnerable Records

Whilst an offsite store should provide acceptable storage conditions for most types of physical record; an organisation may have records which are more vulnerable to damage. The organisation will need to assess if they have particularly vulnerable records and how best they should be stored.

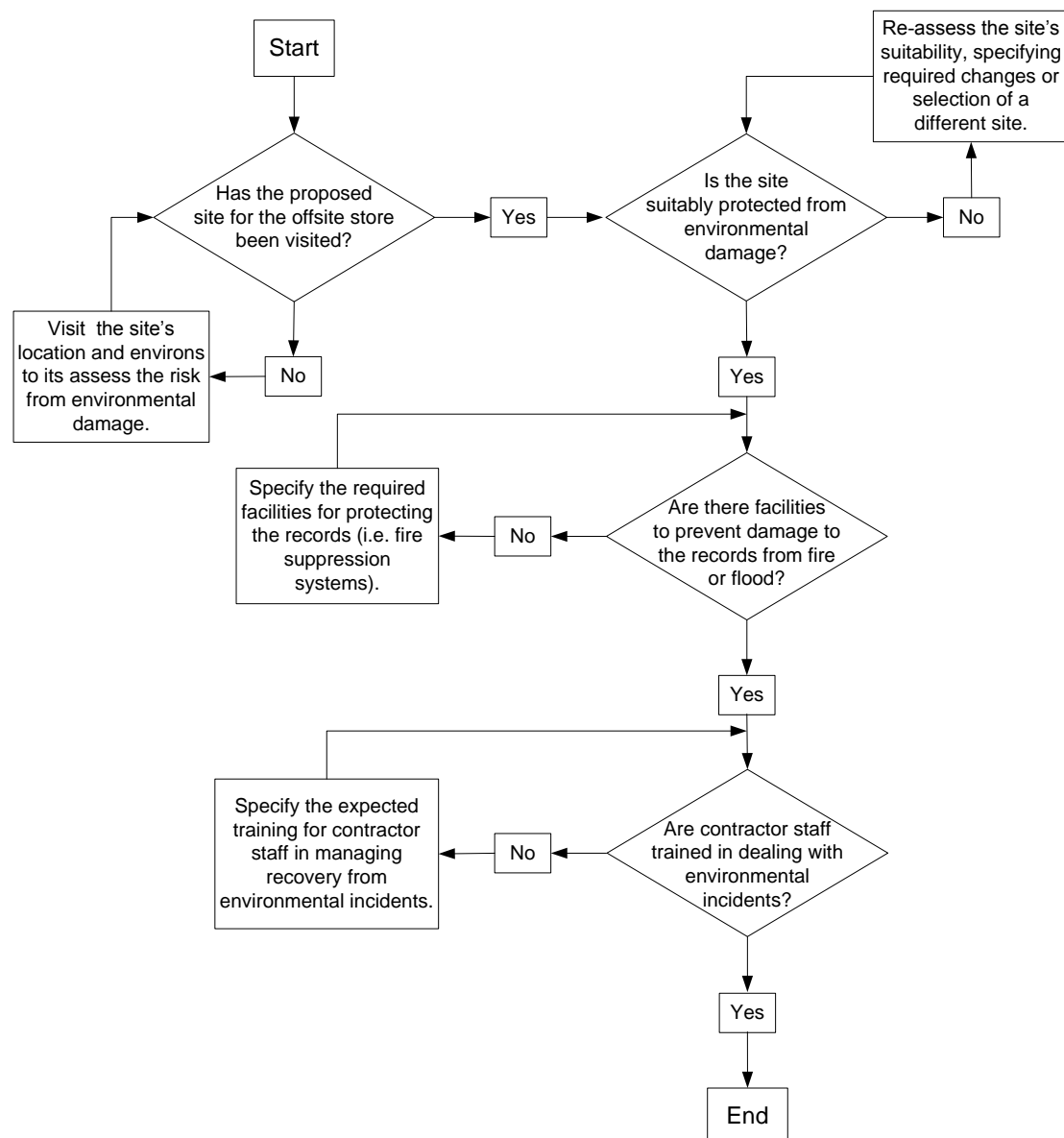
<b>No:</b> 6.2	<b>Consideration:</b> Assess each record category to establish any specific environmental conditions required for storing them.
<b>Rationale:</b> All records must be stored in an environment that protects them from damage through damp, mould or pests. Some record categories, however, may require more specific environmental conditions to protect them from deteriorating. The organisation should identify all vulnerable records <i>prior</i> as storing this type of records in a commercial offsite store can become very expensive where exact environmental conditions are required. If the records are so vulnerable as to be considered not suitable to be stored in a commercial offsite store the organisation must seek specialist advice on the records from specialist conservators.	
<b>Questions:</b> Q77. Has the organisation identified any record categories with a specific storage requirement (i.e. archival standard storage)? Q78. Can the organisation quantify the volume of records likely to require specialised storage? Q79. Can the contractor provide evidence it can maintain the required environment for vulnerable records?	
<b>Outcomes:</b> A77. The profile of each category of record must include any specific storage requirements Section 3.1 <a href="#">Identifying Record Categories</a> discusses how to identify and articulate this need to a potential contractor. If the organisation does not articulate specific storage requirements to the contractor it could lead to records being stored in an unsuitable environment leading to their deterioration or destruction. A78. After establishing specific storage requirements the organisation will need to quantify the volume of records affected. If the contractor cannot provide conditions or space needed for the vulnerable records, the organisation will need to reassess where the records can be stored. If the correct environment is not provided vulnerable records will degrade and may become unusable. A79. If a contractor is unable demonstrate it can provide the required storage conditions (i.e. shelving or environment), the organisation may need to seek a specialised storage provider for the vulnerable records.	

## 9. Environmental Conditions

Records of all formats are vulnerable to damage from either flood, fire, vermin or mould. Ensuring the environment in and around the offsite store is adequately monitored and protected must form a part of the specification for an offsite store.

In addition the organisation must satisfy itself that the location and site for the offsite store is acceptable in terms of potential risk from environmental damage, or insist on an alternative location for their record storage. This process may be managed by allowing the contractor access to the relevant sections of the organisation's risk register relating to record management and control. Additionally before agreeing any contract the organisation must have site of, and assess the contractors own disaster recovery and business continuity plans for the offsite store.

### Environmental Conditions



## 9.1 Surveying the External Environment of the Store

When the organisation is assessing suitable contractors for an offsite store it must visit any proposed locations to see the area around the site is not unduly at risk from environmental damage.

<b>No:</b> 7.0	<b>Consideration:</b> Conduct a full survey of the proposed location for the offsite store to ensure it is suitably protected from environmental damage.
<b>Rationale:</b> As the long-term location for an organisation's records it is important that the offsite store is adequately protected from all potential environmental hazards. Any assessment of an offsite store should involve actually visiting the proposed site. If the organisation does not visit the proposed location it cannot conduct a sufficient risk assessment for the implementation of an offsite store.	
<b>Questions:</b> Q80. Is the offsite store located in a location vulnerable to environmental damage? Q81. Who manages the environment around the site?	
<b>Outcomes:</b> A80. When reviewing a sites location it is important to view it within its local surroundings. Whilst the immediate site may be secure and well protected there may be other problems within the local vicinity such as: <ul style="list-style-type: none"><li>• The site is in a low lying area or flood plain.</li><li>• The site is close to rivers or other bodies of water liable to flood.</li><li>• This site is near overhead power lines or sub-stations.</li><li>• This site is close to industrial sites (power stations etc).</li></ul> It should be noted that other risks such as proximity to airports or flight paths may also need to be considered. This document cannot list every possible environmental concern an organisation may have and they should ensure that all concerns have been addressed before agreeing a location. A81. As well as assessing the location the organisation will need to satisfy itself that the immediate environs of the site are also managed against environmental damage. It would be normal to expect the contractor to manage this aspect of the offsite store, but it may be a third party. Having suitable systems to protect the site is only useful if they are monitored and managed. If this is not done on a regular basis the offsite store could become exposed to any potential environmental hazard.	

## 9.2 Surveying the Environment of the Interior of the Store

When the organisation is assessing suitable contractors for an offsite store it must visit any proposed locations to see the conditions for storing their records is like.

<b>No: 7.1</b>	<p><b>Consideration:</b></p> <p>Conduct a full survey of the proposed location for the offsite store to ensure it is suitably protected from environmental damage.</p>
<p><b>Rationale:</b></p> <p>Current or semi-current records held in an offsite store do not normally require archival standard storage. Physical records will however, survive far better in an environment. In broad terms the environment for current records should not allow large changes in temperature or excess humidity (as increased high temperatures and humidity are more likely to cause mould).</p> <p>It is important however, that the specification is not so prescriptive as to become cost prohibitive. For the assessment of records that are vulnerable to damage see section 8.2 <a href="#">Vulnerable Records</a>.</p>	
<p><b>Questions:</b></p> <p>Q82. Can the contractor demonstrate adequate protection measures for the proposed site?</p> <p>Q83. Are contractor staff trained in how to deal with disaster recovery from environmental damage such as a flood or fire?</p>	
<p><b>Outcomes:</b></p> <p>A82. An organisation must be certain that the contractor is able to protect the records against environmental or pest damage. Depending on a sites location there may be very specific concerns, but in general an offsite store must have in place:</p> <ul style="list-style-type: none"> <li>• Fire suppression systems.</li> <li>• Flood protection.</li> <li>• Vermin control systems.</li> <li>• Temperature and humidity controls.</li> </ul> <p>If a site is not adequately protected there is a risk that the records could be damaged and destroyed potentially causing significant reputational and financial cost to the business.</p> <p>A83. In addition to having specific personnel to manage and monitor the site, all staff and users of the offsite store should be trained in how to deal with an environmental emergency.</p> <p>The organisation should not expect contractor staff to tackle a significant issue such as a large fire or flood. There, however, should be training to cover the basics of delivering early measures that could potentially reduce the amount of records damaged or lost (i.e. use of fire extinguishers in the event of a localised fire).</p>	

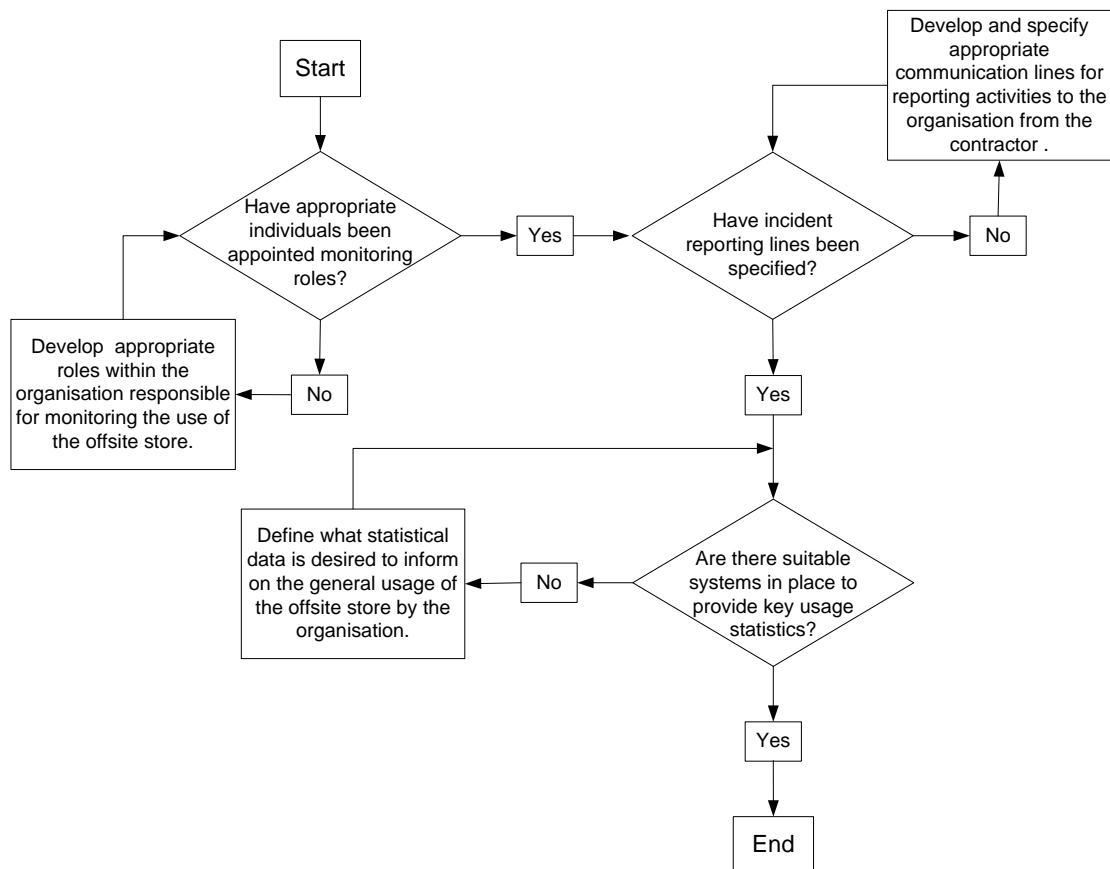
## 10. Auditing and Reporting

Procurement and implementation of an offsite store should not be considered as a single project with a final deliverable. As an organisation develops, its use and requirements for an offsite store are likely to change.

Regularly analysing patterns of use by users of the offsite store will enable the organisation to identify areas of good and bad practice and potential need for change to meet new business needs. Subject to security requirements the organisation will also need designated personnel to visit the store without providing prior notice in order to confirm that the service is being provided to the standard specified in the contract.

Additionally the supporting systems should be used to produce specific reports to identify if the organisation's use of the offsite store has grown out of control, or beyond its original scope.

### Auditing and Reporting



## 10.1 Monitoring use of the offsite store

An organisation should work in partnership with a contractor to monitor the usage of the offsite store. This should include audit reports detailing how the offsite store is used in terms of retrieving and sending records offsite.

Where an organisation has a secondary (or in-house) storage facility the use of this should be audited and reported on in exactly the same way so as to ensure a completely accurate assessment of record storage usage.

<b>No:</b> 8.0	<b>Consideration:</b> Provide an oversight team to monitor use of the offsite store and customer satisfaction.
<b>Rationale:</b> Ensuring that an offsite store remains cost effective and efficient is an important task when ensuring the long-term success of an offsite store. The organisation must monitor levels of use, and type of use, of the offsite store. If there is no strategy in place for monitoring how the offsite store is used it become very poorly used and unreasonable demands placed on the contractor at a potentially increased cost to the organisation, or in a worst-case scenario a failure of the entire project.	
<b>Questions:</b> Q84. Can the organisation provide adequate resource to monitor use of an offsite store? Q85. Does the record / information management team have sufficient authority (or senior support) to execute decisions regarding poor or inappropriate use of an offsite store?	
<b>Outcomes:</b> A84. Monitoring usage of an offsite store should not be seen as an ad hoc process but part of the fulltime records management function. In order to accurately and correctly assess the use of an offsite store the organisation must make provision for resource to perform routine audit and reporting duties on use of the offsite store. If there is not a committed resource the organisation risks the use of the offsite store becoming poorly used and inefficiency leading to significant costs. A85. Producing reports and auditing usage of the offsite store will only be of use if the information can be acted upon. If there is a clear pattern of bad practice in one area of the organisation the record management staff must be able to articulate the problem with support from senior levels. If records management staff are not given the authority to affect change when problems are identified the organisation may incur significant loss of operational efficiency and increased costs.	

## 10.2 Reporting incidents and maintaining communications

As well as an organisation monitoring its usage of the offsite store, it should be expected that the contractor contribute to the effective management of the offsite store. The contractor should have means to report issues and concerns back to the organisation where it has concerns or an incident has occurred.

<b>No:</b> 8.1	<b>Consideration:</b> Establish clear communication channels for incident reporting.
<b>Rationale:</b> The organisation needs to be able to monitor the pattern, pace and frequency of retrieval by both individual users and business units. This is partially to review and identify changes in business need (which can then lead to agreed variations in the contracted service), but also to permit forensic investigations where a security breach may have occurred. The contractor, therefore, must be able to produce appropriate statistics in the form of reports upon demand within a specified time to the organisation. These should be based on known specified criteria relevant to the organisation including but not limited to the following elements individually and in any combination: <ul style="list-style-type: none"><li>• Date range.</li><li>• Category type.</li><li>• Individual file reference.</li><li>• Business units using the records.</li><li>• Individual users requesting the files.</li><li>• Volumes of requests over specified periods.</li><li>• Retrieval service interval used.</li></ul> The auditing of the offsite store must link in to the overall current records use as part of a higher level audit of the organisation's record management provision. If the organisation is unable to effectively monitor the use of the offsite store, there is a significant risk it may not be meeting the current business need at an unnecessary cost in resource and money.	
<b>Questions:</b> Q86. Is there a clear method of communication between the offsite store and the records manager(s) of the organisation?	
<b>Outcomes:</b> A86. Successful reporting relies on the contractor knowing who to talk to on any subject (not just in an emergency). As part of the process of planning for an offsite store the organisation must detail how communications for issues are to be reported to the organisation. For example it may not be appropriate, or useful, to have a telephone conversation detailing the number of emergency requests for records, in such case it would be more useful for a report to be produced and made available to the organisation. Conversely if there is a significant damage to records through flood or fire it will be vital the organisation can be made aware of this immediately.	

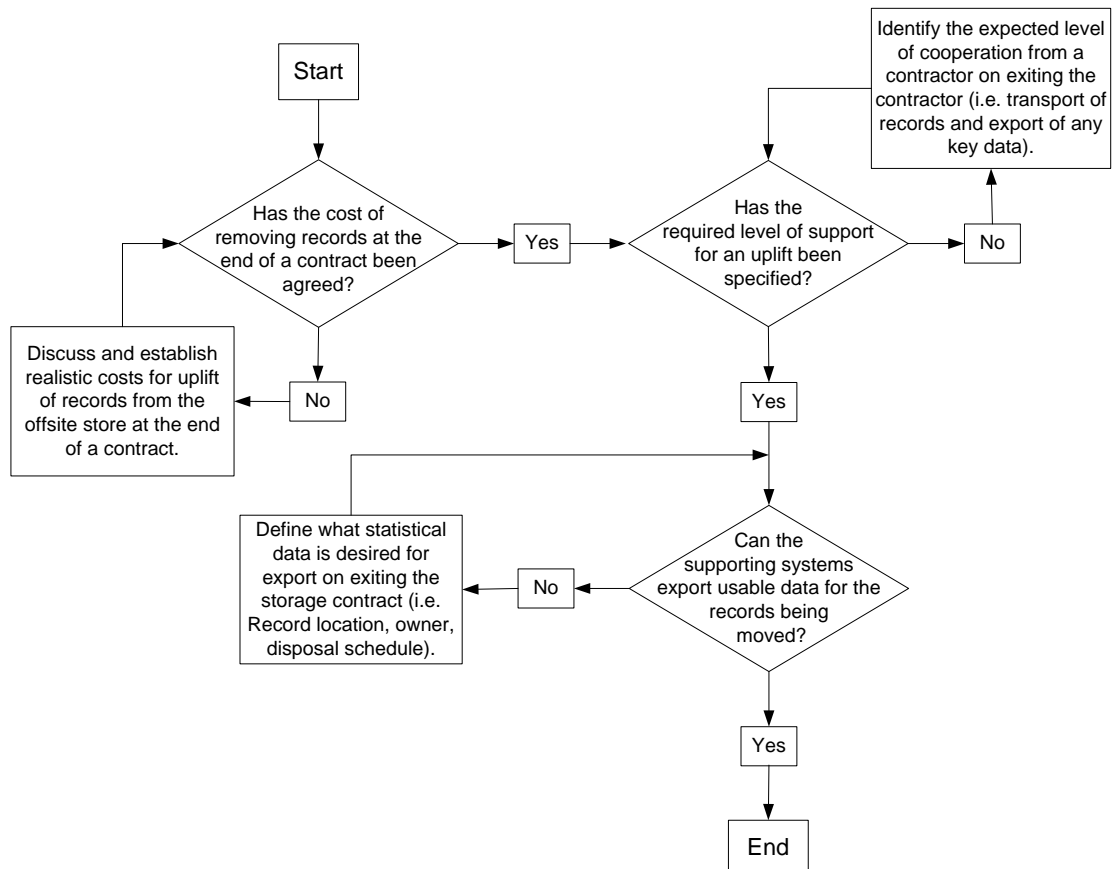
## 11. Exit Strategy

Eventually the organisation may need to move its records from the offsite store. There are likely to be significant reasons for this and it is imperative that the organisation can ensure all the records, and associated information, can be removed from the contractors systems in a usable format *prior* to entering into a contract with them.

Exiting from an existing contract is likely to be expensive and this section is intended principally for the when the life of the contract is reached and the organisation is looking to move to a new supplier. In practice the organisation may decide that the current contractor is providing the most cost efficient service. Irrespective of whether the organisation decides to move to a new contractor or retain the current one's service the exit strategy must still be agreed and in place *prior* to agreeing a new contract.

It should also be noted that another possible exit scenario involves the records remaining in situ but a new contractor taking over management of the offsite store. In this event the below considerations are still valid.

### Exit Strategy



## 11.1 Developing the exit strategy

Part of an organisation's implementation plan should include how the organisation will remove its records and related information when the contract is finished. An inadequate exit strategy could lead to significant costs and effort in removing records and related metadata.

<b>No:</b> 9.0	<b>Consideration:</b> Establish and agree costs for an uplift of records from the offsite store at the end of a contract.
<b>Rationale:</b> Before an organisation agrees to place records with a contractor it needs to be clear on what it expects when the contract has finished. Specifically it will need to agree the likely costs of a significant uplift of records from the offsite store to another location. Offsite storage contracts are often made for very long periods of time, and in practice it is unlikely a contractor will agree a fixed sum for uplifting records. The key point an organisation needs to agree is that the contractor will assist with the relocation as much as is reasonable for them to do so. This must include correct tracking and movement of all records as appropriate depending on the strategy used to relocate the records. The exit strategy must ensure no loss of data or records and must be agreed and understood by both the organisation and the contractor to ensure this.	
<b>Questions:</b> Q87. Is the contractor capable of managing a significant transfer of records?	
<b>Outcomes:</b> A87. Relocating an offsite store's contents is a significant operation. Whilst it is likely to be carried out in a staged process each stage may involve relocating thousands of records. The organisation must seek evidence that the contractor is capable of such significant movements of records, and that every record will be accurately tracked as they are relocated. In addition the contractor must be able to demonstrate that it can export any data held in its tracking systems. If this is not possible then the organisation risks losing not only the ability to confirm the transfer, but also lose relevant data such as the records owner and disposal schedule. The ability to track large movements of records may not be limited to an exit strategy, and a contractor will need to demonstrate it can cope with any potential large transfers of records. If the contractor cannot do there is a risk records will become lost or untraceable once relocated.	

<b>No:</b> 9.1	<p><b>Consideration:</b></p> <p>Specify the actions and data required for exporting all information held on any systems the contractor uses to track the records.</p>
<p><b>Rationale:</b></p> <p>Record tracking systems can be used to retain key information about records held in the offsite store, such as owner, dates, and disposal schedule. An organisation must ensure that all data can be exported in a usable format from the current systems.</p> <p>The exit strategy must ensure be agreed and understood by both the organisation and the contractor to ensure there is a mitigated risk against data loss.</p>	
<p><b>Questions:</b></p> <p>Q88. Can the system export data for the records in a usable open standard format (e.g. csv or xml)?</p> <p>Q89. Is the contractor capable of managing a significant export of data?</p> <p>Q90. Does the contractor have effective means of tracking / auditing the export of data for records from any electronic systems?</p>	
<p><b>Outcomes:</b></p> <p>A88. Any database system must be able to export its data in a format that can be used by another similar database system. Whilst not all systems will use the same means of managing the data it is crucial that the format of an export is in a common open standard format such as .CSV or .XML.</p> <p>If the data is not exportable in a usable format the organisation risks losing significant information regarding the management of its records that it may not be possible to recreate.</p> <p>A89. The organisation must seek evidence that the contractor (or owner of the systems) is capable of exporting data from the record tracking systems.</p> <p>The ability to export large volumes of metadata may not be limited to an exit strategy, and a contractor will need to demonstrate it can cope with any potential large exports at anytime. If the contractor cannot do this there is a risk metadata will become lost.</p>	
<p><b>Outcomes:</b></p> <p>A90. Whenever a system exports metadata it must be able to audit the whole process to identify as a minimum:</p> <ul style="list-style-type: none"> <li>• When it was exported?</li> <li>• What was exported?</li> <li>• Who exported it?</li> <li>• The reason for the export?</li> </ul> <p>It is vital to the security and integrity of the records being transferred that this information is available for the contractor to verify the export was valid and authorised, and that everything that should have been exported was.</p>	

## **12. Purchasing**

### **12.1 Assessing the Contractor**

This document does not specify how an organisation may choose to select an offsite store outside of the provision that the contractor meet the specified levels of service detailed in an Invitation to Tender. An organisation should, however, ensure that the selected contractor is economically secure.

If an organisation were to relocate a large number of records to an offsite site only for the contractor to go out of business, there could be a significant impact on both operational efficiency and cost of moving the records to another location.

### **12.2 Purchasing frameworks**

Owing to the variety of ways a service may be purchased this document does not prescribe how an organisation should tender and contract an offsite store. Every organisation must identify its statutory and regulatory purchasing frameworks to ensure that the services are purchased using the correct procedures.

Failure to purchase under the specific guidelines could lead to a serious issue possibly involving compensation to other potential contractors disadvantaged by incorrect purchasing processes.

### **12.3 Shared Services**

Whilst it is vital a contract meets the organisation's business need, it does not have to be an individually purchased service. As identified in the National Audit Office report "*Improving Corporate Functions Using Shared Services*," purchasing an offsite storage contract service with other organisations could provide greater negotiating power over costs such as price of storage, retrieval charges, other services and support system costs.

If an organisation does decide to enter into a shared service for an offsite store it is vital that it is confident that the procured contract meets their key business needs and represents best value for money for that organisation.

### **12.4 Understanding contractors' charging models**

As well as the obvious costs of storing and retrieving records there are a plethora of other services that may be offered by an offsite storage provider. These can range from managing the appraisal and disposal of records to the provision of digital surrogates as an alternative to retrieving records.

Not all of these services will be of use to an organisation, but it is likely some will. When evaluating bids for an offsite store, the organisation may need to look beyond merely the cheapest provision of storage and retrieval. According to the level of demand for additional services, which may fluctuate over time, the choice of a contractor that can provide the full required level of service may be different. It is recommended that in comparing costs, the organisation seeks to understand the charging model of the potential provider(s) and tests them against different variables.

## 13. Bibliography

The following is a list of references that may be referred to when developing the specification for offsite storage.

### 13.1 Legislation

All public bodies will be affected by information legislation. These will need to be considered when specifying certain aspects of an offsite storage service. It should be noted that there may be other legislation pertinent to the organisation and it will be necessary to refer to those as well.

Public Records Act 1958 (c. 51):

<http://www.nationalarchives.gov.uk/policy/act/default.htm>

Data Protection Act 1998 (c. 29):

[http://www.ico.gov.uk/what\\_we\\_cover/data\\_protection/legislation\\_in\\_full.aspx](http://www.ico.gov.uk/what_we_cover/data_protection/legislation_in_full.aspx)

Freedom of Information Act 2000 (c. 36):

[http://www.ico.gov.uk/what\\_we\\_cover/freedom\\_of\\_information/legislation\\_in\\_full.aspx](http://www.ico.gov.uk/what_we_cover/freedom_of_information/legislation_in_full.aspx)

Environmental Information Regulations 1992/3240:

[http://www.ico.gov.uk/what\\_we\\_cover/environmental\\_information\\_regulation/egislation\\_in\\_full.aspx](http://www.ico.gov.uk/what_we_cover/environmental_information_regulation/egislation_in_full.aspx)

### 13.2 Relevant Standards and Other References

There are also a range of British and International standards which will provide useful information on certain aspects of record management and storage of records.

BSI publications can be available from their website:

<http://www.bsi-global.com/en/Shop/>

British Standards Institution BSi DISC PD0008: 1999 **Code of Practice for Legal Admissibility and Evidential Weight of Information Stored Electronically.**

British Standards Institution BSi DISC PD0018: 2001 **Code of Practice: Information Management Systems: Building Systems fit for Audit**

ISO publications are available from their website:

<http://www.iso.org/iso/en/prods-services/ISOstore/store.html>

International Standards Organisation ISO 17799 / BS7799 **Information Security Management.**

International Standards Organisation ISO 15489 **Information and Documentation: Records Management, 2 vols. 2001.**

International Standards Organisation ISO 9001: 2000 **Quality management systems: Requirements.**

International Standards Organisation ISO 23950 **Information and Documentation: Information retrieval (Z39.50): application service definition and protocol specification.**

**Improving Corporate Functions Using Shared Services 2007.**

[http://www.nao.org.uk/publications/0708/improving\\_corporate\\_functions.aspx](http://www.nao.org.uk/publications/0708/improving_corporate_functions.aspx)