



The National Archives Records Management Guides

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Introduction

This Records Management Guide has been produced by The National Archives as part of a series of brief explanatory guides, which have been developed to help public authorities achieve compliance with the Code of Practice issued by the Lord Chancellor under Section 46 of the Freedom of Information Act 2000. This Code provides guidance on good practice in records management to all authorities subject to either the Freedom of Information Act, or the Public Records Act 1958 or the Public Records Act (Northern Ireland) 1923. For the convenience of the reader this Code is hereafter referred to as the Records Management Code.

This Guide gives an overview of records management policy, describing what such a policy is and explaining its purpose and aims. It covers:

- The steps involved in developing and writing the policy
- Recommendations on what to include in the policy
- How to issue and implement the policy
- Ensuring the policy is consistent with and complements related organisational policies
- Details of relevant standards, guidance and examples of records management policies.

What is a Records Management Policy?

A records management policy is a document, which serves as a mandate for managing records in the organisation. It is a statement that describes what the organisation does and intends to do with respect to its records. It underpins a records management programme, giving it authority and emphasising its importance to the organisation.

Purpose of the Records Management Policy

The Records Management Code specifies that organisations should have in place a records management policy but there are other good reasons for having one. It gives authority to the recordkeeping programme, outlines staff and management responsibilities and ensures that the records management function is given due priority.

In particular the records management policy:

- Informs staff and management of the importance of records management to the organisation, both strategically and operationally
- Describes in general terms responsibilities for records and in particular refers to the role of the Records Manager
- Provides a basis for accountability by ensuring relevant, evidential information and documentation is maintained in a retrievable form

- Ensures compliance with relevant legislation
- Provides for a records management system to meet the organisation's business need for authentic, reliable and usable records
- Establishes how records are created, kept and disposed of

How to Write a Records Management Policy

This section of the guide outlines a series of steps to follow in developing an effective records management policy. Whether you need to carry out all the activities or just some of them will depend on your organisation's current level of records management.

1. Establish Senior Management Support

Senior management support is essential to the success of the records management programme. You may need to convince senior managers of the need for and benefits of records management (set out above).

2. Research the Organisation's Current Records Management Practices, Resources and Attitudes

If you do not already know what your organisation's records management practice is, you need to investigate it to identify any gaps. This will help you to establish a new policy's content, priorities and emphasis. Where the programme is strong the policy should reflect this; where it is weak the policy should provide an impetus for development or improvement. At this stage you will also be in a position to assess the corporate culture and whether it is on balance supportive of or resistant to records management. The question of resources for the records management function must also be addressed. You will need to ensure that the policy is realistic and achievable given the organisational culture and available resources.

3. Consult Staff

It is important to establish staff views on records management in general and a policy in particular. Staff will have useful insights into corporate culture as well as recordkeeping generally which should inform the records management policy and related procedures. Consultation now will also make it easier to secure buy-in later.

4. Research the Organisation's Legal and Regulatory Environment

If you do not already know your organisation's legal and regulatory environment and obligations, you need to research them because they are such a powerful driver in records management policy. Establish the legal and regulatory obligations for records management and consider any community expectations and/or standards and best practices. The most relevant standards and best practice guidance are listed at the end of this guide.

5. Look at other Organisations' Records Management Policies

Examples from other organisations – particularly those in the same sector – can be a useful starting point. If your organisation already has a policy, this research will provide a useful benchmark.

6. Overall Policy Framework

The records management policy will be one of a range of organisational policies, which it should complement and refer to. It is important to locate and research these other policies to ensure a coherent policy framework. This research will also help you decide whether the records management policy should be one large all-encompassing document or rather an over-arching policy that refers to more specific detailed policies which taken together provide a comprehensive records management policy.

7. Map out Policy

Once you have completed your research you should be in a position to sketch out the broad parameters of the records management policy. Guidance on the detail to insert is given below in the next section.

What to Include in a Records Management Policy

The exact content of the policy will depend upon the overall policy framework of the organisation and the approach taken to subsidiary policy elements (for example information security policy or email policy). Here is an overview of the content areas to be included. For a checklist of detailed content for records management policy, see ***Complying with the Records Management Code: Evaluation Workbook and Methodology*** available from the National Archives website at:

<http://www.nationalarchives.gov.uk/electronicrecords/code.htm>

Responsibilities

The policy must include a clear statement of the responsibilities of the organisation and its management, staff, contractors and volunteers with respect to records management. This should include the requirement to document actions and decisions by creating and filing records as well as subsequent maintenance and disposal of those records.

The policy should state who is responsible for compliance with the policy. The role and authority of the records manager or other staff given operational responsibility for records management must be clearly defined. If possible, a named senior management post should be given overall responsibility for the corporate records management programme.

Senior Management Endorsement

The policy must be clearly endorsed by senior management, preferably within the policy itself.

Scope

The policy must set out the scope of records management activities in the organisation. This requires a definition of records and a statement that the policy applies to all records created, received or maintained by the organisation and its staff in the course of business. There must be no doubt as to the type and format of records included in the programme and if necessary particular formats should be specified. The policy should also be clear on which phases of the records' life are included. For example, prior to creation (to cover control of the development of systems to capture records) is usually included but not management of records once they have been transferred to an archives service.

Statutory and Regulatory Environment

The policy should describe, or at least reflect, the organisation's statutory and regulatory environment. If relevant, it should specify legislation and regulations which rely on effective recordkeeping for compliance.

Applicable Standards

An effective records management policy will refer to the international records management standard, BS ISO 15489, and state a commitment to comply with it. Reference should be made to other relevant standards, for example those developed by The National Archives, if appropriate.

Relationship with Other Policies

A records management policy does not exist in a vacuum but is part of the organisation's overall policy framework. The policy must outline clearly how it relates to other organisational policies. Examples are policies dealing with data protection, information security and email. There may also be technical policies governing the selection of new types of technologies that process electronic records and preservation or maintenance policies addressing the ongoing viability of such records for as long as they continue to be required. There may also be individual records management policies agreed with particular business units.

Recordkeeping Requirements

The policy should specify the requirements that must be met to ensure reliable records of the organisation's activities or should refer to other standards, relevant guidance or procedural documents containing this detail. Wherever they appear, the requirements to be specified must include:

- All staff should create the necessary records to provide comprehensive, reliable and authentic evidence of the organisation's decisions and activities
- Records are subject to a retention/disposal policy and supporting schedules which are properly implemented to ensure records are destroyed or transferred elsewhere at the appropriate time
- Provision for the preservation and secure storage of records for as long as they are required
- All systems and processes dealing with records ensure the quality and reliability of the organisation's records

Access to the Organisation's Records

The policy must specify who has the authority and right to access its records. Access rights will be primarily governed by legislation (in particular Freedom of Information and Data Protection). The type of business the organisation conducts will also play a role in deciding its access policy. It is possible to have a separate records access policy but in either case it must clearly state:

- Which staff may have access to records and under what circumstances
- The principles by which access to records is granted to external users/researchers
- Any provision for roles or bodies within the organisation to judge the sensitivity of records, identify any restriction, and determine groups or individuals both external and within the organisation who are eligible for access

Security

As with access rights, record security may be dealt with in a separate information security policy. If this is the case, the records management policy should refer to it. If not, it should specify a requirement that all records and recordkeeping systems (including those which are electronic) should be secure and safeguarded from alteration, misinterpretation or loss.

Inactive Records

Where there is an operational need for inactive records to be transferred out of current systems, the policy should state who is responsible for their management. This may be the records manager or another trusted custodian. The purpose of this is to ensure that such records are properly managed in accordance with the same policy and procedures which apply to current records.

Vital Records and Emergency Planning

Vital records management and emergency planning are an important aspect of records management. They are part of the organisation's wider business continuity and risk management regime, and policies and procedures need to complement and refer to these. The records management policy must state:

- That records (regardless of medium or format) which are vital to the organisation in the event of an emergency or essential to its continuation of business are identified and protected
- The need for measures to prevent disasters compromising the records and recordkeeping systems
- The need for a disaster recovery plan if electronic systems are compromised or physical records damaged
- The need for records and records management processes to be maintained in spite of any technical or strategic hitches that may occur
- Provision for back-ups of records and recordkeeping systems to a required and corporately agreed standard, with a robust back-up restoration regime

Relationship of the Policy to Records Management Procedures

The records management policy cannot give detailed instructions on all aspects of the records management programme. The policy must refer to other elements, such as procedures dealing with day-to-day records management operations, for example strategies and plans, file plans and procedures, retention schedules and implementation procedures, and access procedures.

Monitoring Compliance

To be effective there needs to be a mechanism to monitor compliance. The policy should state this and mandate an appropriate person/role to undertake monitoring. It is also recommended that the records manager should prepare an annual report on the organisation's records management.

Implementation

A comprehensive policy will address implementation across the organisation, either by referring to an implementation plan or, if the programme is more established, by indicating a more general implementation requirement. The next section of this guide addresses implementation strategies in more detail.

Issue and Implementation

The records management policy should be issued and/or published so that all staff can have access to it. Senior management endorsement should be explicit in the policy, but it is recommended that the senior manager responsible for the records management function issues the policy or notification of the policy together with an indication of how it will be adopted and implemented. It should be made clear to staff that adherence to the policy is mandatory.

Records management policies are usually developed as part of a wider records management project. This may be in conjunction with, or as a result of, a records survey, implementation of an electronic recordkeeping system or a blitz on record system housekeeping. A strategy should be in place to ensure that the policy is read, understood and embraced by the staff.

Implementation strategies and tactics include:

- Briefing sessions for staff to introduce the records management policy and to raise awareness of staff responsibilities
- Ensuring that new staff, including temporary staff and consultants, are made aware of the policy
- Making the policy readily available to staff at all levels of the organisation

Review

Any policy will require review since organisations change over time. As organisations change, so do the records which support business and operations. The policy should be reviewed at least once every three years. Effective review requires:

- An established review cycle
- Assignment of responsibility for review to a named person or role
- A set of review criteria

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Further Guidance

Standards

- *ISO 15489-1:2001 Information and documentation – Records Management (Part 1 General)*
- *PD ISO/TR 15489-2:2001 Information and documentation – Records Management (Part 2: Guidelines)*

Guidance

- *Complying with the Records Management Code: Evaluation Workbook and Methodology Consultation Draft*
http://www.nationalarchives.gov.uk/documents/record_management_compliance.pdf
- *Guidelines for management, appraisal and preservation of electronic records: Volume 1 Principles*
<http://www.nationalarchives.gov.uk/electronicrecords/advice/guidelines.htm>
- *Corporate Policy on Electronic Records*
- *Guidelines on Developing a Policy on Managing e-mail*
- *Managing Web Resources: Management of Electronic Records on Web-Sites and Intranets: An ERM Toolkit*

All available at: <http://www.nationalarchives.gov.uk/electronicrecords/advice/>

Examples of Records Management Policies

- Sample records management policy for schools in Appendix A of *Developing Records Management Compliant With The Lord Chancellor's Code Of Practice Under Section 46 Of The Freedom Of Information Act 2000: Model Action Plan for Schools*
<http://www.nationalarchives.gov.uk/policy/foi/>
- JISC Records Management Policy Statement
http://www.jisc.ac.uk/index.cfm?name=pres_rmeps
- City University Records Management Policy Statement
<http://www.city.ac.uk/ic/rm/rmpolicy.html>
- The Financial Services Authority Records Management Policy and Standards – RMPS
http://www.fsa.gov.uk/pages/information/pdf/records_policy.pdf