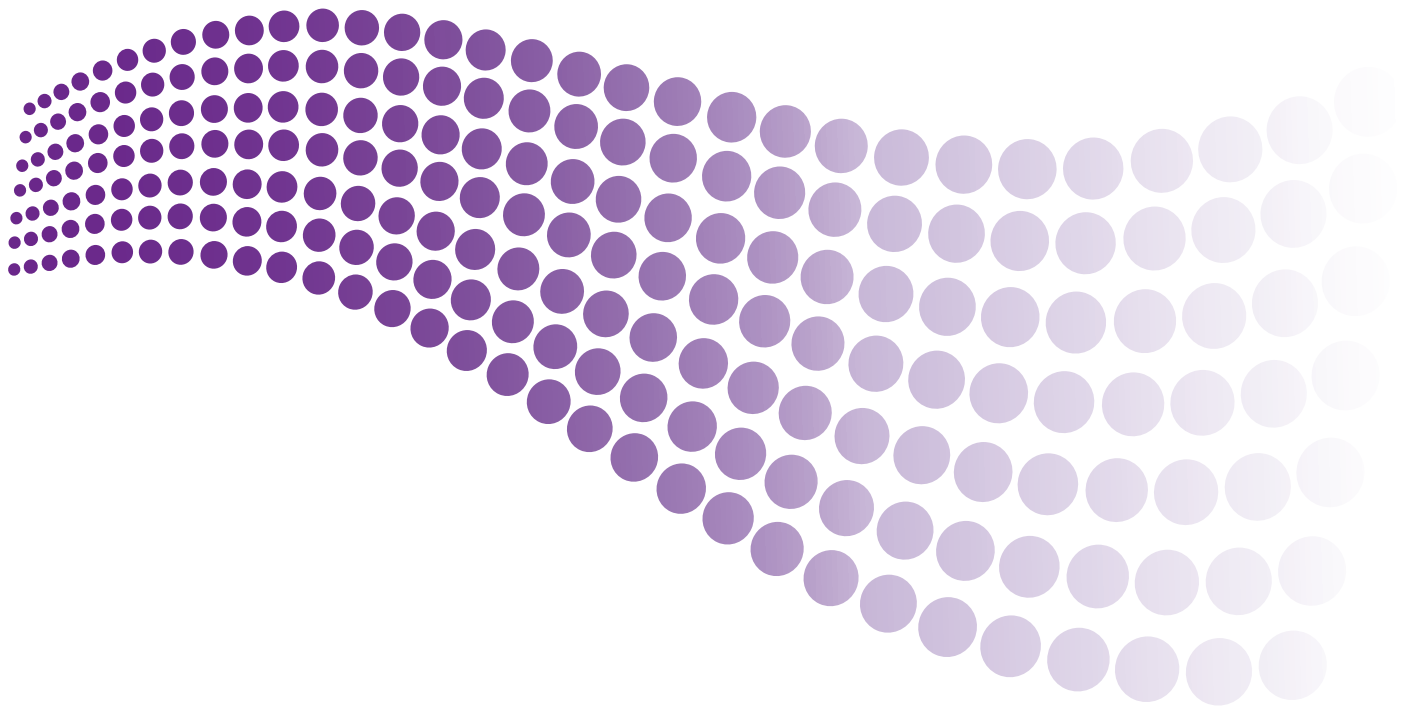


Guide 2 Organisational arrangements to support records management



This guidance has been produced in support of the good practice recommendations in the Code of Practice on Records Management issued by the Lord Chancellor under section 46 of the Freedom of Information Act 2000. A PDF version of the full code can be found here:

www.justice.gov.uk/guidance/docs/foi-section-46-code-of-practice.pdf

Who should read this guide

This guide is written for people who have no background in records and information management but find themselves responsible for it within their organisation or have some other reason for acquiring a basic understanding of the subject.

What this guide is about

This guide is the second in a series of guides produced to support the good practice recommendations in the Code of Practice on Records Management issued by the Lord Chancellor under section 46 of the Freedom of Information Act 2000 (from now on this Code of Practice will be referred to as 'the Code').

This guide covers the first good practice recommendation:

'Authorities should have in place organisational arrangements that support records management'

Good records and information management requires an organisational infrastructure as well as action by staff as part of their daily work. Section 6 of the Code identifies nine things that should be in place as part of this organisational infrastructure. This guide describes each of these things in more detail and explains what they mean in practice. It is arranged in the following sections:

- 1 **Records management as a corporate function**
- 2 **Inclusion of records and information management in the corporate risk management framework**
- 3 **Governance framework for records management**
- 4 **Instructions to staff and managers on keeping and managing records**
- 5 **Identifying and managing the information and business systems that hold records**
- 6 **Records management during major organisational and other changes**
- 7 **Staff training and awareness**
- 8 **Records management programme**
- 9 **Resources for the records management programme**

At the end there are references to some **further guidance** and a list of **other guides** in this series.

Note that these guides do not apply to the management of archives, i.e. the small proportion of records selected for permanent preservation and transferred to an archives service once they were no longer needed by the authority for current business or legal purposes.

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1 Records management as a corporate function

Keeping and managing records is part of everyone's daily work, usually using the facilities of modern technology. But although these records are kept by individuals, they are not solely for individual use. They form part of the organisation's information resource and are a corporate asset. To work effectively, managing records needs overall strategic direction and oversight.

The Code recognises this in a number of different ways. One is a recommendation that records management should be identified as a core corporate function so that it is subject to controls and given resources in the same way as other functions that involve management of assets, such as human resources and property. However, the Code also recognises that organisations work in different ways and use different terms, and accepts that records management might be included in a wider knowledge or information management function.

EXAMPLES Records management in the organisational structure

- ◆ In The National Archives, managing our records is part of a wider Knowledge and Information Management function.
- ◆ In Dorset County Council, the records management function is part of legal services within Corporate Resources Directorate.

The records management function should be comprehensive in terms of:

- format – it should cover all records, whatever the technology used to create and store them and should include business systems¹ as well as traditional correspondence files and email
- lifetime – it should cover records throughout their life, from planning and creation through to disposal
- location – it should include records wherever they are and should also cover records managed on behalf of the authority by an external body such as a contractor.

2 Inclusion of records and information management in the corporate risk management framework

Records and information are one of the organisation's assets but there are risks associated with them.

EXAMPLES Records risk

- ◆ Records are not kept.
- ◆ Records are not kept securely.
- ◆ Records cannot be accessed and used because of technological obsolescence or because they have become unreadable.
- ◆ Information that requires particular protection, such as sensitive personal information, is disclosed inappropriately.

¹ Examples of business systems are a finance system which records all of the organisation's financial transactions and holds the information required for managing budgets and audit, and a call centre customer management system

Risks need managing. Risk management can be as simple or as complicated as you want it to be but essentially it is a technique to identify, assess and manage risks to the organisation. It is a matter of:

- considering what might go wrong and why
- assessing likelihood and impact – how likely it is to go wrong and how serious the repercussions might be
- identifying preventive measures to reduce the chance of the risk becoming a reality
- deciding what should be done if, despite these preventive measures, the risk does become a reality.

Most organisations do this already. The chief executive and other senior managers assess risks to the organisation as a whole – corporate risks – on a regular basis. Programme and project managers assess risks to their particular programmes and projects as a matter of course.

Risk registers are the tool used to manage risks and a large organisation is likely to have several risk registers in use at any one time.

EXAMPLE An entry in a simple risk register

Risk: records are not kept securely.

Likelihood: 2 (this example uses a numerical ranking system of 1-4, with 1 for low risk and 4 for high risk).

Impact: 3 (similar ranking system).

Preventive measures: clear procedures and instructions, training for all staff, reminders using usual communications channels, regular checks.

Response measures: apply breach handling procedures.

The Code recommends that records and information management are included in the organisation's risk management framework.

Realistically, some records matter more to your organisation than others. This has an impact on risk management as well as on other aspects of records management, such as storage facilities and disaster recovery plans. For example, the risks connected with loss or unauthorised disclosure of patient records are higher than those for records relating to running the hospital canteen. Because of this, hospitals will need to identify them as high risk records and put arrangements in place to prevent and mitigate the risks.

TOP TIPS

- ◆ Assess records to identify those presenting particular risks which require particular measures.
- ◆ Brief the person with lead responsibility (see **section 3**) on risks so that a decision can be made as to which should be added to the corporate risk register.
- ◆ Remember that risks can change over time and should be reviewed periodically.

Information assurance is the discipline that specialises in information risk management. Many organisations use an information assurance specialist to oversee and report on information risk management processes and procedures.

3 Governance framework for records management

Governance framework is the term used for formal arrangements about accountability and responsibility. Effective records management requires strategic direction and oversight as well as the day to day involvement of all staff whose job includes keeping records of their work. A prerequisite for this is clarity about responsibility and accountability. The Code recommends that organisations define roles and lines of responsibility for managing records so that it is clear who is responsible and accountable for what.

This guide identifies five roles and their responsibilities. These are described below:

- **Lead responsibility**
- **Operational responsibility**
- **Local responsibility**
- **Managers' responsibility**
- **Staff responsibility**

Lead responsibility

Responsibility for strategic direction and oversight should be given to someone who is sufficiently senior to act as the accountable person and a champion for records management. This person should oversee policy and strategy and ensure that the necessary resources are made available and remedial action is taken when problems arise.

EXAMPLE Lead responsibility

- ◆ In central government the lead person is usually the Chief Information Officer who is at or near Board level.

In large organisations one person, perhaps a Board member, may be given senior-level responsibility for records management while someone else at a lower level has operational responsibility. In smaller organisations the roles may well be combined. This is not because records management is less important in smaller organisations but because their structure is less likely to lend itself to a division of responsibilities by level. The Code does not recommend one model over the other. What matters is that:

- roles and responsibilities are clearly allocated
- if more than one person is involved, a working relationship with good lines of communication is established
- the person or persons concerned are capable of doing the work.

Operational responsibility

The person with operational responsibility – the practitioner – develops the records management programme and then manages its implementation and overall functioning. The practitioner might be called records or information manager or might have some other job title but taking day to day responsibility for records management in the organisation should be at least part of their job. It should be included in their job description and the person should be given both the necessary authority and the time to do the work required.

EXAMPLE Operational responsibility

- ◆ In The National Archives the person with operation responsibility is called Head of Knowledge and Information Management (KIM).

Here are some of the things the practitioner is likely to do:

- develop, implement and maintain the organisation's records management policy and supporting procedures and guidance
- work with business units² to determine what records they should keep of their work and where and how they should keep them
- develop, implement and maintain disposal policies and schedules, also in collaboration with business units
- advise ICT and other staff on the records management needs of systems used to create and hold records
- identify vital records (i.e. records critical to the continued functioning of the organisation in the event of an emergency or disaster) and establish procedures to protect and manage them, including assisting in disaster recovery
- train staff, including new staff, on records management procedures and provide ad hoc advice when required
- carry out regular reviews of all aspects of the records management programme and make recommendations for improvement if necessary

How do organisations find a practitioner? They have several options:

- appoint a records manager with relevant qualifications and/or experience
- make an existing staff member responsible for running the records management programme and ensure they undertake appropriate training – in smaller organisations this new responsibility may be in addition to other duties
- outsource, e.g. contract a service to develop and implement the records management programme – the service could include ongoing maintenance, with the necessary organisational input being provided by a member of staff as contract manager.

Organisations should decide which is the most suitable option for themselves, depending on their size, the state of their records management, the resources available and the relative costs of the different options. These may change over time so the arrangement should be kept under review.

² The term 'business units' is used in the Code, but they could also be known by another name, e.g. divisions or sections

Local responsibility

Larger organisations and organisations with staff dispersed over several sites will probably find it useful to have a network of people who take responsibility for managing records in their business unit or on each site. They should do this work under the general supervision of the person with operational responsibility for records management.

TOP TIPS

If you have such a network, try to make it a working, self-supporting community.

- ◆ Set up discussions groups online.
- ◆ Involve them in finding solutions to local problems.

Managers' responsibility

Managers of business units and projects are responsible for ensuring that their staff keep adequate records of their work in accordance with agreed procedures and arrangements. Managers are accountable for the work of their business units and they should ensure that adequate records of that work are kept. (The concept of 'adequate records' is outlined in **Guide 4**.)

Staff responsibility

In the modern government and business environment all staff will be keeping and managing records. The quality and success of the records management programme will depend on their contributions. Your organisation cannot meet its legal, regulatory and accountability requirements unless all staff keep complete and accurate records which adequately document their work.

Ideally, records responsibilities will be included in the job descriptions of those with particular responsibilities for managing records, with regular monitoring and assessment of performance.

4 Instructions to staff and managers on keeping and managing records

Records are kept as part of, or as a result of, a business activity or process but sometimes individuals must take active steps to ensure a record is kept, including creating a record if necessary.

EXAMPLE Responsibility for keeping records

- ◆ Someone whose job requires them to decide whether an individual is eligible for a particular social welfare benefit is responsible for keeping a record of the decision and the action taken as a consequence.

The Code recommends that it should be made clear to all staff (including temporary staff) that they are personally responsible for keeping records of their work in accordance with agreed procedures. There are a number of ways of doing this. The records management policy (see **Guide 3**) provides the overall framework and should include a commitment by the organisation to keep records documenting its principal activities. However, the policy is unlikely to set out what records should be kept in sufficient detail to serve as instructions to staff. Supporting documents such as business rules or operational procedures will make it clear to staff precisely what records should be kept by them and how to do so. (See also **Guide 4**.)

5 Identifying and managing the information and business systems that hold records

Unless an organisation knows what systems it is using and exercises control over them, there is a risk that staff will not be able to find records and use information when needed. For this reason the Code recommends the essential step of identifying all business and information systems that hold records.

TOP TIP

- ◆ Do a stock-take of systems holding records.

The Code also recommends provision of the resources required to maintain and protect the integrity of those systems and the information they contain. This is a crucial element of the organisational infrastructure for records management.

(See also **Guide 5** for systems holding records and **Guide 6** for maintaining those systems.)

6 Records management during major organisational and other changes

Change creates the greatest risks to the keeping of records and to their continued availability. The Code recommends that records management implications should be considered when changes are planned or are happening, particularly in the following circumstances:

- **Planning or implementing ICT systems**
- **Extending staff access to new technologies**
- **Planning and implementing restructuring or major changes to the organisation**

Planning or implementing ICT systems

Sometimes Information and Communication Technology (ICT) systems are introduced which are effective for their intended purpose but lack essential records management capability. For example, it may not be possible to delete data in accordance with disposal schedules or to use access controls to restrict access to sensitive information. Considering the records management implications from the start can prevent these problems arising.

TOP TIPS

- ◆ Keep in close touch with ICT colleagues so that you get early warning of planned work and can press for involvement.
- ◆ Brief the person with lead responsibility on the need to ensure the Board does not approve plans for new systems until records management implications have been considered.

Extending staff access to new technologies

Similar problems can arise when new technology is extended to staff. For example, if staff use portable devices such as BlackBerrys, will the emails they send and receive be part of the relevant records system? Particular attention should be paid to corporate information of value to the organisation that is contributed by staff to systems outside its control, e.g. on social networking, blogs or micro-blogging sites. Staff who are allowed to use social media for work purposes should be instructed to ensure that anything they contribute that is of continuing value to the organisation is added to the organisation's records.

TOP TIP

- ◆ Ensure that emails sent and received using portable devices can be stored in corporate systems.

Planning and implementing restructuring or major changes to the organisation

Organisational changes happen in the public and private sectors alike, e.g. to restructure the organisation, to take on new functions or shed existing ones, or to contract-out functions.

EXAMPLES Organisational change

- ◆ In central government, machinery of government changes in 2007 led to responsibility for prisons and the probation service moving from the Home Office to the Ministry of Justice.
- ◆ Local government has undergone several significant structural changes, e.g. the creation of new unitary authorities in non-metropolitan areas in the 1990s.

Bodies acquiring new responsibilities need access to records about those responsibilities. This requires:

- liaison between the bodies losing and gaining responsibilities
- planning to ensure a smooth transition and reduce the risk of things going wrong in terms of records management.

Failure to manage organisational change can put at risk continued access to records needed for the daily work of staff and can lead to loss of information or failure to comply with information legislation.

TOP TIPS

- ◆ Decide what should happen to records held by the body losing the function or being abolished.
- ◆ Document any transfer of records.
- ◆ Agree how to manage future Freedom of Information (FOI) requests relating to those records.

7 Staff training and awareness

Staff awareness is critical to the success of records management in an organisation. The Code recognises this and recommends that all staff should receive the training they need to meet the organisation's expectations of them with regards to records. Below is an explanation of the training and awareness required for:

- **All staff**
- **The practitioner (the person with operational responsibility)**
- **The senior management lead**

All staff

All staff, including temporary staff, contractors and others working for the organisation, should receive induction training that outlines the organisation's records management policies, standards, procedures and guidelines and makes clear their personal responsibilities. The records manager should work with human resources, in-house training and communications colleagues to plan records management awareness raising and training.

Some possible training methods are:

- inclusion of records management in the organisation's employee induction programme
- formal technical training for employees new to particular system responsibilities or at times of system change
- formal or informal in-service training and coaching
- training courses provided by external training providers either as part of their general syllabus or customised to meet the organisation's requirements.

The selection of training approaches will depend on the roles and responsibilities of the staff concerned and on your organisation's approach to training and development.

TOP TIPS

- ◆ Follow up initial training – offer refresher training and surgeries.
- ◆ Keep records management visible within your organisation by publishing news items in newsletters and on internal websites.

The practitioner (the person with operational responsibility)

The records manager needs a full understanding of records management principles and practices. He or she also needs to be aware of the organisation's obligations under the Freedom of Information Act (FOIA) and other relevant legislation so that the records management policies and procedures will support compliance with those obligations. The practitioner also needs to understand how records management fits in with related responsibilities, such as for information security.

Some of this is a matter of applying common sense but specialist knowledge is required also, especially in the early stages of developing a records management programme in the organisation and when implementing new systems or arrangements. The skills and knowledge required will depend on the scope of the job and the work required of the person. They may vary over time, depending on what needs to be done to get records management on a proper footing in the organisation and keep it there.

EXAMPLE The skills and knowledge required for records management

In central government, a professional skills framework has been developed for knowledge and information management (which includes records management). See: gkimn.nationalarchives.gov.uk/framework.htm.

This identifies four levels: strategist, leader, manager and practitioner and lists relevant skills for each level under four headings:

- strategic planning for knowledge and information management (business focus)
- using and exploiting knowledge and information (user focus)
- managing and organising information (process focus)
- information governance (compliance focus).

This framework provides a basis for developing job or role descriptions and describing the knowledge and skills expected of the records manager within central government.

A new practitioner without relevant qualifications or experience should be provided with opportunities to acquire the necessary knowledge and skills through training courses and other means such as mentoring by an experienced record manager or formal study for a relevant qualification. The Code also recommends that staff who work primarily in records and information management should be given opportunities to undertake continuing professional development by attending training courses, conferences, etc.

The senior management lead

The person with lead responsibility needs a general understanding of what the records manager is trying to achieve but does not need to be a records specialist themselves. For training purposes this person will count as a general staff member.

8 Records management programme

Organisations vary in their records management capability and the extent to which their practices conform to part 1 of the Code. Where they are now and what is required to get them to where they need to be will determine the scale of the records management programme and what is included in the annual plan of activity.

Other factors that will affect annual plans are restructuring, office moves and introduction of new technology or systems. The priority should be the essential building blocks of good records management – the policy, the procedures, the disposal schedules, secure storage, training and so on, as described elsewhere in this guide and in the other guides in this series. Once these building blocks are in place the plan should include recurring elements such as disposal of records in accordance with disposal schedules, training of new staff, and monitoring of compliance with procedures issued by the records manager.

TOP TIPS

- ◆ Ask heads of business units and other colleagues if there is anything they would like included in the records management programme.
- ◆ Get agreement by heads of business units to anything in annual plans that will require contributions from them or their staff.

9 Resources for the records management programme

The Code recommends that organisations provide the financial and other resources needed to achieve the objectives agreed in the records management programme. Budget provision, either within the budget for the records management function or elsewhere, will be needed for:

- staff including all costs associated with recruiting and employing staff
- secure storage facilities
- equipment and materials
- specialist software if used, including purchase, installation and licences
- training and communications
- travel, transport and couriering if the organisation has more than one site
- destruction of records.

Securing resources beyond the necessary minimum can be difficult and support from the person with lead responsibility will be critical.

TOP TIPS

- ◆ Identify benefits that will result from providing resources and the risks resulting from not providing them.
- ◆ Build up alliances with colleagues working in ICT, audit, information assurance, information security etc. whose interests overlap with yours.

Further guidance

- *Lord Chancellor's Code of Practice on the management of records issues under section 46 of the Freedom of Information Act 2000:*

www.justice.gov.uk/guidance/docs/foi-section-46-code-of-practice.pdf

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)*

These can be purchased from the British Standards Institution, together with supporting guidance. For details of what is available search under 'information governance' at shop.bsigroup.com.

Guidance from The National Archives

- *Information matters: building government's capability in managing knowledge and information:*
gkimn.nationalarchives.gov.uk/documents/information-matters-strategy.pdf
- *Professional skills framework for government KIM (Knowledge and Information Management) professionals:*
gkimn.nationalarchives.gov.uk/framework.htm
- *Information risk:*
nationalarchives.gov.uk/services/publications/information-risk.pdf
- *Machinery of government changes: guidance on transfer of records, information and knowledge:*
nationalarchives.gov.uk/documents/mog.pdf
- *Assessing records management in public authorities – self assessment tool:*
nationalarchives.gov.uk/information-management/projects-and-work/assessing-rm-public-authorities.htm

Guidance from the Information Commissioner's Office

- *FOI Awareness Guidance Number 8, Records Management FAQs:*

www.ico.gov.uk/upload/documents/library/freedom_of_information/detailed_specialist_guides/awareness_guidance_8_-_records_management_faqs_v2.pdf

Other relevant guidance

- *Information assurance – central government framework:*

www.cesg.gov.uk/products_services/iacs/iamm/index.shtml

Training

Training is provided at various levels. Some universities run dedicated graduate and post-graduate programmes in records and information management – for details of these universities see digicult.info/farmer. Other universities provide a records and information management module as part of a wider course, e.g. the Information Rights Law and Practice LLM offered by the **University of Northumbria**.

Many organisations provide short courses on records management – law firms, consultancy companies and membership bodies such as **ASLIB** and the **Records Management Society**. They are advertised on their websites and through mailing lists. The main mailing lists are hosted by JISC and can be found at jiscmail.ac.uk. See in particular records-management-uk, archives-nra, freedom-of-information and data-protection.

Other guides in this series

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| Guide 7 | Security and access |
| Guide 8 | Disposal of records |
| Guide 9 | Records created in the course of collaborative working or through out-sourcing |
| Guide 10 | Monitoring and reporting on records management |

These guides can be found on our website:

nationalarchives.gov.uk/information-management/projects-and-work/implementation-guides.htm