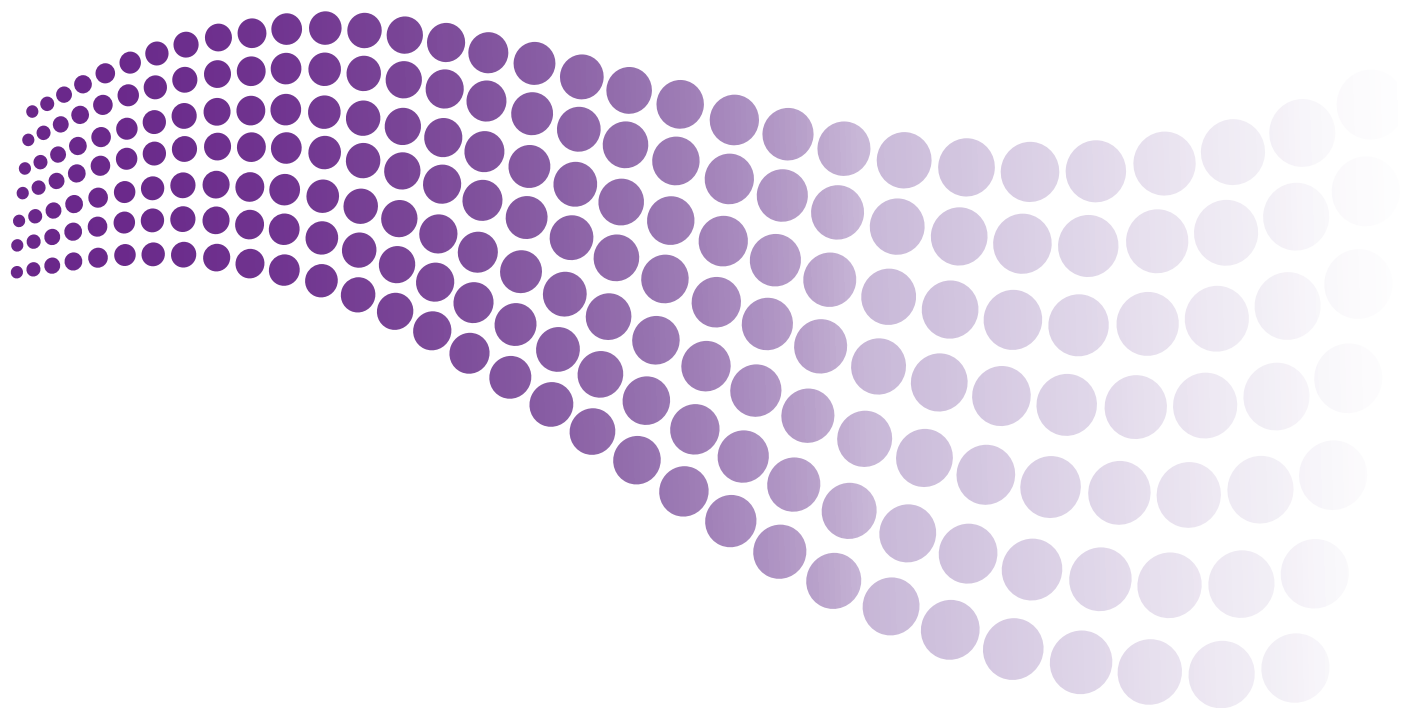


Guide 3 Records management policy



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 one of 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 second good practice recommendation in the Code:

'Authorities should have in place a records management policy, either as a separate policy or as part of a wider information or knowledge management policy.'

It explains why a records management policy statement is important and expands on the guidance at section 7 of the Code about its contents, and how it should be developed and issued.

The guide is arranged in the following sections:

- 1 Purpose and scope of the records management policy**
- 2 Contents of the records management policy**
- 3 How to write a records management policy**
- 4 Issuing and implementing the records management policy**
- 5 Reviewing the records management policy**

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 organisation for current business or legal reasons.

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1 Purpose and scope of the records management policy

A records management policy is a cornerstone of effective management of records in an organisation. It:

- demonstrates to employees and stakeholders that managing records is important to the organisation
- provides a statement of intentions that underpins a records management programme
- serves as a mandate for the activities of the records manager
- provides a framework for supporting documents such as procedures, business rules, disposal schedules etc.

For all of these reasons the Code recommends that all organisations should have a records management policy in place.

However, the Code recognises that some organisations may prefer to include records within a wider information or knowledge management policy and leaves it open to them to choose this option. The important thing is that whatever the policy is called, it should be clear to those reading it that it covers records. For simplicity this guide will continue to refer to the policy as a records management policy.

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.

But it need not be a long and detailed document. Indeed, depending on your organisation's general approach to policy documents, it may be more successful if it is short and strategic.

TOP TIP

- ◆ Keep the policy short – leave details of how records are managed and instructions to staff to supporting documents unless your organisation's policies habitually contain this level of detail.

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

2 Contents of the records management policy

The exact contents of the policy will depend upon the overall policy framework of the organisation. Below is a description of the things that the Code recommends should be included as a minimum:

- **Overall commitment**
- **Role of records management**
- **References to related policies**
- **Responsibilities**
- **References to supporting documents**
- **Monitoring of compliance**

Overall commitment

Inclusion of a commitment to keep records of the organisation's activities informs all staff of the importance attached to managing records. The policy should define the scope of this commitment in terms of activities and records covered – see the references to comprehensiveness in **section 1** – and leave staff in no doubt that their work and their records of their work fall within its scope. Ideally it will include a commitment to conform to the Code.

Role of records management

There should be an explanation of the relationship of records management to the overall business strategy, e.g. by reiterating that information is an asset considered essential to the work of the organisation.

References to related policies

A records management policy does not exist in a vacuum but is part of the organisation's overall policy framework. The policy should outline clearly how it relates to other organisational policies (see also **section 3, step 6** below). 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 even be individual records management policies agreed with particular business units which would count as subsidiary policies.

Responsibilities

There should be a description of the responsibilities of managers, staff (permanent and temporary), contractors and volunteers with respect to records management. This should include the requirement to document actions and decisions by keeping records as well as subsequent maintenance and disposal of those records. The policy should state who is responsible for ensuring that staff comply with the policy. The role and authority of the person with lead responsibility for records management should be clearly defined, also the role and authority of the records manager and other staff given operational responsibility, if applicable (see **Guide 2** for further guidance on responsibilities).

References to supporting documents

The policy is usually supported by procedures dealing with day-to-day records management operations and by disposal schedules. There could also be a reference to the existence of protocols for data sharing if applicable.

Monitoring of compliance

The policy should mandate an appropriate person/role to undertake monitoring and prepare reports. (See **Guide 10** for guidance on monitoring.)

Organisations may also want to include others things. For example:

- **Statutory and regulatory environment**
- **Access arrangements**
- **Responsibility for inactive records**
- **Reference to related standards and guidance**
- **Implementation details**

Statutory and regulatory environment

It can be useful to refer to the statutory and regulatory environment if there is legislation directly relevant to records management in the organisation.

Access arrangements

The policy may specify who has a right of access to the organisation's records, who is responsible for making decisions concerning access or restriction of access to records, and how those decisions are made. Alternatively there could be a reference to a separate access or information security policy which could go into more detail than is practicable for an overall records management policy and would be identified as a subsidiary or related policy as applicable.

Responsibility for inactive records

The policy could include details of who is responsible for the management of inactive records transferred out of current systems. This might 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 as apply to current records.

Reference to related standards and guidance

These could be referred to in the policy or annexed.

Implementation details

The policy could include details of 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. Implementation strategies are dealt with in more detail later in this guide.

3 How to write a records management policy

This section of the guide outlines a series of steps to follow in developing the 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.

- **Step 1: Establish senior management support**
- **Step 2: Research the organisation's current records management practices, resources and attitudes**
- **Step 3: Consult staff**
- **Step 4: Research the organisation's legal and regulatory environment**
- **Step 5: Look at other policies**
- **Step 6: Overall policy framework**
- **Step 7: Draft the policy**

Step 1: Establish senior management support

Support from the person with lead responsibility for records management will be essential to the success of the records management policy. You may need to convince other senior managers of the need for and benefits of records management and, in this context, the policy. (See **Guide 2** for details of the role of the person with lead responsibility.)

TOP TIPS

- ◆ Tap into relevant organisational agenda and initiatives.
- ◆ Explain the importance of a policy as an initial platform for improvement in records management practices.
- ◆ Suggest that issuing a new policy will offer a 'quick win' for records management work.

Step 2: Research the organisation's current records management practices, resources and attitudes

If you do not already know what your organisation's records management practices are, you need to investigate them and identify any gaps. This will help you to establish the new policy's content, priorities and emphasis. At this stage you should 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 will also be relevant. The policy should be realistic and achievable given the organisational culture and available resources.

Step 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 records management practices which should inform the records management policy and related procedures.

TOP TIP

- ◆ Consultation now will make it easier to secure buy-in later, because staff will feel their views and concerns were taken into account.

Step 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 potentially such a powerful driver in records management policy. Establish the key legal and regulatory obligations for records management and consider any community expectations and/or standards and best practice that should be taken into account in the policy.

EXAMPLES Legal and regulatory obligations

- ◆ The Data Protection Act sets rules for how you handle personal information.
- ◆ Health and safety legislation requires you to keep details of accidents.
- ◆ Auditing bodies have certain expectations about the availability of records for audit.

Step 5: Look at other policies

Examples of records management policies from other organisations – particularly those in the same sector – can be a useful starting point.

TOP TIPS

- ◆ Use good examples from other organisation's policies. But adjust them as necessary to ensure your records management policy has the right corporate look and feel.

Step 6: Overall policy framework

Many organisations will have a collection of policies that the records management policy should complement and refer to. It is important to locate and research these other policies to ensure a coherent policy framework.

EXAMPLES Related policies

- ◆ Data protection.
- ◆ Information security.
- ◆ Business continuity.
- ◆ Risk management.
- ◆ Freedom of Information (FOI).
- ◆ Email.

Step 7: Draft the policy

Once you have completed your research you should be in a position to draft the records management policy.

4 Issuing and implementing the records management policy

This section of the guide suggests some approaches to issuing and implementing the policy. It is not prescriptive because organisations differ and what works in one might not work in another. This section covers:

- **Senior management endorsement**
- **Issuing the policy**
- **Making the policy available, internally and externally**
- **Awareness-raising**
- **Implementing the policy**

Senior management endorsement

Senior management support is a critical success factor. The policy should be clearly endorsed by senior management in the same way as other significant policies of the organisation. There are several options, depending on the organisation's usual practice:

- the policy could include a statement that it has been formally approved
- the name of a senior officer could appear at the foot of the policy – this could be the person with lead responsibility or someone else whose endorsement carries weight
- the policy could be issued in a way that makes it clear to all staff that it is an official approved policy that should be taken seriously.

Issuing the policy

Ideally, there will be a formal launch of the policy with internal publicity which draws it to the attention of staff and makes it clear to them that adherence to its provisions is mandatory. Most organisations have standard arrangements for informing staff of things they need to know, such as memos circulated to all staff or news items on their internal website. Another possibility is an event in which the policy is launched by the person with lead responsibility. This could be complemented by local publicity, for example a slot at team or divisional meetings.

Which option is chosen will depend on what works best in your organisation. However, it should be made clear that the policy is part of a wider programme and is accompanied or will be followed shortly by supporting policies and procedures and briefings or training sessions.

TOP TIP

- ◆ Make connections to initiatives such as a forthcoming records survey or implementation of an electronic recordkeeping system.

Making the policy available, internally and externally

The records management policy should be accessible to all staff, which means it should be easy to find. It should also be easy to read and understand.

The Code recommends that organisations consider publishing the policy so that it is accessible to members of the public. The benefits of publishing the policy are transparency and the likelihood that members of the public intending to make FOI requests will be better equipped to make those requests. An additional reason is that the Information Commissioner has specifically recommended publication of records management policies in his guidance on FOI Publication Schemes.²

Awareness-raising

Awareness-raising is a continuous process. When the records management policy is first issued, briefing sessions can be arranged for staff to introduce it and to raise staff awareness of their responsibilities with regard to records. However, some of the staff who receive this briefing will leave, to be replaced by new staff, and in any case memories fade and good practice can lapse over time.

TOP TIPS

- ◆ Make sure all new staff, including temporary staff and consultants, read the policy.
- ◆ Remind staff of its provisions occasionally. Offer refresher training or drop-in sessions or surgeries, write articles for the staff magazine and include news items on the internal website.

Implementing the policy

Implementing a new policy requires thorough planning. There may be resistance to change within the organisation and the benefits of new arrangements may need to be explained and sold to staff. Implementation strategies include:

- initial and continuing publicity
- ensuring related procedures and guidance are in place
- emphasising senior management endorsement
- being visible and accessible, e.g. visiting each part of the organisation in turn
- monitoring and reporting (see **Guide 10**).

5 Reviewing the records management policy

Policies should reflect current needs. But things change over time – the organisation may lose or gain functions, restructure itself, adopt new technology or introduce new ways of working. These events may affect the records which support business and operations and bring a need to review, and probably update, the policy and procedures underpinning records management.

² ICO has issued guidance on Publication Schemes in the form of Definition Documents for each sector which specify the expected contents of Publication Schemes. Records management policies are specified within the class 'Policies and procedures'

The Code recommends that the policy should be reviewed and, if necessary, amended so that it is kept up to date and continues to meet the organisation's needs. However, it does not specify a fixed review date (e.g. after 3 years). Instead it recommends that organisations decide the frequency of periodic review for themselves. It also recommends that they review the policy after major organisational or technological changes. Identification of issues that require attention during monitoring is another trigger for a review. (See **Guide 10** for more on monitoring.)

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

- *Managing records without an electronic records management system:*
nationalarchives.gov.uk/documents/managing-electronic-records-without-an-erms-publication-edition.pdf
- *Complying with the Records Management Code: self-assessment tool:*
nationalarchives.gov.uk/information-management/projects-and-work/assessing-rm-public-authorities.htm

There is also relevant guidance in these toolkits:

- *How to produce a corporate policy on electronic records*
- *Guidelines on developing a policy on managing email*
- *Management of electronic records on websites and Intranets: an ERM toolkit*

The toolkits are available from:

nationalarchives.gov.uk/information-management/projects-and-work/electronic-records-toolkits.htm

Other guides in this series

- Guide 1** What is records management?
- Guide 2** Organisational arrangements to support records management
- Guide 4** Keeping records to meet corporate requirements
- Guide 5** Records systems
- Guide 6** Storage and maintenance of records
- 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