

Complying with the Records Management Code: Evaluation Workbook and Methodology

**Module 4: Active records management: records
creation and record keeping**

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General

- 6.1 This module deals with the need to establish a records keeping or records management system within an organisation, which will ensure that authentic, reliable and usable records are created and maintained for as long as they are needed.
- 6.2 The international standard for records management - *BS ISO 15489 Information and documentation. Records management* defines reliability as one of the four key characteristics, which have to be present in order for a record to exist. It states that a reliable record is one “*whose contents can be trusted as a full and accurate representation of the transactions, activities or facts to which they attest and can be depended upon in the course of subsequent transactions or activities*”. Records should be created at the time of the transaction or incident to which they relate, or soon afterwards, by individuals who have direct knowledge of the facts or by instruments routinely used within the business to conduct the transaction.
- 6.3 *BS ISO 15489* further states in clarification of the characteristic reliability that “*any system deployed to manage records should be capable of continuous and regular operation in accordance with responsible procedures. A records system should*
- *routinely capture all records within the scope of the business activities it covers,*
 - *organise the records in a way that reflects the business processes of the record’s creator*
 - *protect the records from unauthorised alteration or disposition,*
 - *routinely function as the primary source of information about actions that are documented in the records, and*
 - *provide ready access to all relevant records and related metadata”*
- 6.4 Reliability therefore will be apparent if there is evidence that the records were created and captured as part of a legitimate business process and assigned to a logical and appropriate location within the business’ own classification schema or file-plan where the record will then be subject to corporate management of its disposal. The identity and where possible the specific role of everyone involved in the creation and capture of the record should be clearly apparent. The operational context or business process within which a record has been generated or managed should also be visible.
- 6.5 A records management system must be capable of managing all the records generated or held by the organisation irrespective of form. It should extend to the management of physical records (e.g. paper files, microfilm etc) and electronic records including, where appropriate, e-mail.

- 6.6 The relevant workbook questions which should be used to assess the level of compliance relating to these activities commence on page 5.

Context

- 6.7 Section 8 of the Records Management Code lists the key features and activities required to establish the processes, rules and mechanisms required for the effective management of existing and newly created records. For record creation it states that:

Each operational/business unit of an authority should have in place an adequate system for documenting its activities. This system should take into account the legislative and regulatory environments in which the authority works.

Records of a business activity should be complete and accurate enough to allow employees and their successors to undertake appropriate actions in the context of their responsibilities, to

- *facilitate an audit or examination of the business by anyone so authorised,*
- *protect the legal and other rights of the authority, its clients and any other person affected by its actions, and*
- *provide authenticity of the records so that the evidence derived from them is shown to be credible and authoritative.*

Records created by the authority should be arranged in a record keeping system that will enable the authority to obtain the maximum benefit from the quick and easy retrieval of information.

- 6.8 The Code provides the following statement in respect of record keeping or records management:

Installing and maintaining an effective records management programme depends on knowledge of what records are held, in what form they are made accessible, and their relationship to organisational functions. An information survey or record audit will meet this requirement, help to promote control over the records, and provide valuable data for developing records appraisal and disposal procedures.

Paper and electronic record keeping systems should contain metadata (descriptive and technical documentation) to enable the system and the records to be understood and to be operated efficiently, and to provide an administrative context for effective management of the records.

The record-keeping system, whether paper or electronic, should include a set of rules for referencing, titling, indexing and, if appropriate, security marking of records. These should be easily understood and should enable the efficient retrieval of information

- 6.9 The need to locate and retrieve information takes on added importance under FOI. The requirements of both sections 1 and 16 of the Freedom

of Information Act 2000 and the *Lord Chancellor's Code of Practice on the Discharge of the Functions of Public Authorities* issued under section 45 of the Freedom of Information Act cannot be met unless adequate record keeping systems are in place.

Relevant guidance

6.10 Each sector may have its own sector specific rules, regulations and guidance and readers of this workbook should reference such guidance when establishing a record keeping or management system. Additional guidance on this subject has been provided by The National Archives (TNA) and is available on the TNA web-site. Although some of the earlier publications were written initially for a central government audience they are broadly relevant to any public authority requiring to manage its records in conformance with the Records Management Code. The following publications should be used:

Framework for strategic planning and implementation

Guidance for an inventory of electronic record collections: A toolkit

Evaluating information assets: appraising the inventory of electronic records

Managing web resources: management of electronic records on websites and intranets: an ERM toolkit

Business classification scheme design

These publications can be downloaded in PDF form from the TNA website at the following web address:

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

6.11 Other relevant guidance on records management published by TNA can be accessed within the records management section of the TNA website at:

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

6.12 The Joint Information Systems Committee (JISC) commissioned Cimtech Ltd to develop an *Electronic Records Management System Implementation Toolkit* for use within the further education and higher education sector. They envisage that this toolkit will provide institutional records managers and other information professionals with a 'one-stop shop' for impartial, detailed and practical advice of use during all stages of a proposed or actual EDRMS implementation that is free from vendor-bias and specific to the needs of the further education and higher education sector. The toolkit can be accessed from the following web address:

<http://www.jisc.ac.uk/edrmtoolkit.html>

Evaluation questionnaire

6.13 To assess whether this element has been adequately addressed see the questions in the table on the following page, numbered 1 to 23 in this workbook... Guidance on how to analyse the responses to these questions is provided in the chapter entitled *Risk evaluation and development of mitigation strategies*.

1. *Is there guidance on what constitutes a record and what should be done to safeguard it and make it accessible via a record keeping system within each business unit?* Yes No N/A

(Note: technically any recorded information created within an organisation constitutes a record however in practice most organisations distinguish between those communications which document activities and transactions which each part of the business must retain in order to discharge its remit and those which are purely ephemeral and which do not need to be kept and classified within a corporate file-plan.)

Reference

2. *Is there a process to check that each business unit has appropriate guidance on what constitutes a record?* Yes No N/A

Reference

3. *Has each business unit defined what records need to be kept within each unit to enable the organisation to undertake all necessary and appropriate actions?* Yes No N/A

(Note: the phrase "necessary and appropriate actions" includes statutory and regulatory requirements as well as the organisation's own administrative and corporate needs for accurate information. Each business unit should consider the need to provide additional advice to its staff to ensure the appropriate records for that portion of the business are identified and retained. Where this additional advice is absent organisations need to check the guidance on what constitutes a record - referred to in question 83 above - is sufficient)

Reference

4. *Where business units have defined their requirement for records has this been independently assessed by an auditor?* Yes No N/A

Reference

5. *Are there mechanisms in place to authenticate records so that they constitute credible and authoritative evidence in order to protect the rights of the organisation and any person affected by its actions?* Yes No N/A

Reference

6. *Is there specific provision within the organisation's guidance for the capture, management and secure storage of electronic information (e.g. e-mails and other digital record objects) into corporately controlled storage areas where shared access permissions are applied?* Yes No N/A

Reference

7. *Has the organisation undertaken an information audit or survey to identify all the sets of records (physical and electronic) it holds relating to each business function, with their covering dates and location?* Yes No N/A

Reference

8. *Does the inventory, resulting from this audit, record the business groups responsible for the creation, use and management of each collection and, if different, the data owner?* Yes No N/A

(note this may cover more than one business group as creators and custodians can vary and may be in addition to the "data owner")

Reference

9. *Has the organisation established a record keeping system (e.g. an electronic record management system) to manage its records?* Yes No N/A

Reference

10. *Is the record keeping or management system used for the management of current and newly created electronic records (including e-mail) as well as physical records (e.g. paper)?* Yes No N/A

Reference

11. *Is there a corporate business classification scheme or file-plan for the storage and retrieval of existing and new records?* Yes No N/A

Reference

12. *Does the record keeping or record management system take into account the legislative and regulatory environments within which the organisation operates?* Yes No N/A

Reference

13. *Does the record keeping or records management system provide for roles and groups with appropriate access permissions to be established to ensure that data privacy is safe-guarded?* Yes No N/A

Reference

14. Does the record keeping or records management system provide for links to associated information concerning the role and purpose of a record set which is not apparent from the business function which has custody of the records? Yes No N/A

(Note: electronic record management systems facilitate the creations and management of such links. It is possible to do this to some extent in a physical paper environment using indexes but it is far more labour intensive. The absence of links to associated information (where associations are known to exist) when records are being managed electronically may imply the organisation is not obtaining the full value of its investment.)

Reference

15. Does the record keeping or records management system record the date on which a record set was opened, or, if applicable, the creation date of the earliest document/record it contains in order to determine the date range of the record set? Yes No N/A

Reference

16. Does the record keeping or records management system record the dates on which record sets were closed, or, if applicable, the latest current date of the document/record it contains in order to determine the date range of the record set? Yes No N/A

Reference

17. Where record sets are dormant (i.e. closed or inactive) is this recorded in the record keeping or records management system? Yes No N/A

Reference

18. Where applicable are cut-off dates recorded to determine the parts of a set of records due for management processing or disposal? Yes No N/A

(e.g. .the regular date used to separate parts of a continuing record collection for management purposes (for example, the end of the financial year, annually, calendar year, quarterly, monthly, weekly)

Reference

19. *Where a set of records are held in electronic form, have links or relationships to other sets of electronic records or databases, or to sets of physical records, been recorded to identify the source and location of these related information assets?* Yes No N/A

(Note: - this is to map links and inputs from other systems or record sets – in some instances some electronic records can only remain viable if the existing inputs from related systems are maintained. It is also to identify paper material which constitutes part of this record; and to enable identification of duplicated and/or missing material)

Reference

20. *Where a set of records is held in physical form (e.g. paper, microform) have relationships to other physical records, or to electronic records and systems, been recorded?* Yes No N/A

Reference

21. *Does the record keeping or record management system record the physical location of each record set?* Yes No N/A

(Note - in addition to recording the location of physical records this should also extend to where electronic or digital records are held, i.e. the computer system, data archive storage and network location and should extend to the location of back-up/security copies)

Reference

22. *Does the record keeping or record management system record the physical hardware and software formats or application types in which electronic record collections are created and held?* Yes No N/A

(note this may be directly by an end-user or by extraction from a larger set of electronic information)

Reference

23. Where applicable does the record keeping or record management system record the application of protective markings to each record collection? Yes No N/A

(Note - this question is likely only to be relevant to those organisations where protective markings are used to identify records subject to national security classifications (e.g. Restricted, Confidential, Secret etc.) The purpose of the question is to determine if security protective marking applies to an entire record collection, or to identify that a security marking applies to elements of a record collection)¹

Reference

¹ This requirement will normally be confined to central government departments and agencies