

Information Management Assessment

Ministry of Housing, Communities
and Local Government

Reviewed

May 2018

Published

Jan 2020

Working with government
to raise standards in
information management

Contents

Background	2
Report opinion	2
Executive summary	2
Key highlights	4
Detailed findings of the assessment	7
Strategic planning and risk	
Current IT systems and technical change	
Control and oversight of current practice	
Compliance	
Annex A – Recommendations with proposed supporting actions	12

© Crown copyright 2018



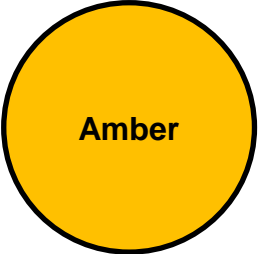
You may use and re-use the information featured in this report (not including logos) free of charge in any format or medium, under the terms of the [Open Government Licence v3.0](#).

Any enquiries regarding the use and re-use of this information resource should be sent to psi@nationalarchives.gsi.gov.uk

Background

- The National Archives’ Information Management Assessment (IMA) programme was set up to review standards of information, records and knowledge management in government organisations.
- The National Archives previously conducted an IMA of the Department of Communities and Local Government (DCLG) in 2012. The assessment was formally closed in 2015. The IMA of the Ministry of Housing, Communities and Local Government (MHCLG) involved a detailed review of supporting documentation provided by the department and interviews with senior staff, specialists and practitioners. These were held at the department’s offices in London between 14 and 17 May.
- This report provides a summary of the good practice and risks we identified, focussing on the most significant findings.

Report opinion

Assurance rating	Opinion
	<ul style="list-style-type: none"> • There is partial assurance that approaches to information management are currently positioned to support efficiency and effectiveness and compliance with legal obligations and responsibilities. • It identifies a number of areas where the department needs to improve its capability.

Executive summary

- The ten areas of focus in this assessment cover a range of strategic issues. MHCLG receives one ‘Good’ and three ‘Satisfactory’ ratings with planning for records transfer to The National Archives identified as an area of strength.
- Processes for the review of paper records are established and working well. However, MHCLG now faces a challenge in building on this and defining how it will process growing volumes of digital records to enable legal compliance with the Public Records Act. Similarly, while governance arrangements and policy provision appear appropriate at the moment, MHCLG should seek to develop and improve performance in both areas to support the coming move to Office 365. MHCLG needs to ensure information management principles are embedded in guidance and training (see recommendation 5) and ensure greater business ownership of information management practice (see recommendation 4). Historically, there has been no framework to drive and sustain business engagement in this respect, but MHCLG now has the opportunity to introduce one.
- The report identifies six ‘Development areas’ centring on:

- o setting strategic direction for knowledge and information management (recommendation 1)
 - o planning to control legacy digital information to enable exploitation (recommendation 2)
 - o oversight of the risks raised by information management (recommendation 3)
 - o the current IT environment (recommendation 7)
 - o IT change processes (recommendation 8)
 - o processes for monitoring compliance with information management policy and assessing capability of business areas (recommendation 6)
- Good practice models from within the IMA programme include Cabinet Office and HM Treasury who have established senior staff as customers for maturity assessments of business areas and associated improvement plans.
 - The report makes the recommendations outlined in summary below. These are identified as having a high (H), medium (M) or low (L) priority.

H	Relates to a core gap or area of risk with the potential to undermine a key aspects of progress made to date if it is not given precedence during the period of IMA action plan implementation.
M	Relates to a significant gap or area of risk where improvements need to be made during IMA action implementation to sustain and/or improve current performance.
L	Relates to a gap or area of risk where opportunities to build on and consolidate existing practices have been identified.

- See Annex A for a full list of proposed supporting actions against each recommendation.

Recommendations		Priority
1	In support of the Digital strategy and IT Modernisation Project, establish meaningful and forward facing strategic principles, and a vision for knowledge and information management. There should be a strong focus on driving improved information management behaviours.	H
2	Define an overall plan to establish control of the department's holdings of poorly organised and unstructured legacy digital information. This should enable disposal of material that no longer needs to be retained, exploitation of information with value, and management of digital continuity threats.	H
3	As part of current work to increase the capability of the department's corporate centre, establish an overall consolidated definition of the information management related risk that the department faces.	H

4	Define options for a new governance model for information management in the new IT environment that can drive business engagement and ownership of information management practice. The central resource should be positioned to coordinate capability building activities.	H
5	Ensure that Knowledge and Information Management (KIM) staff play a central role in both developing and promoting the policy and guidance principles that will help shape how information is managed in the Office 365 environment.	H
6	Develop an approach to monitoring, assessing and reporting on information and records management practice.	H
7	Establish a framework to enable continued assessment of the delivery of business requirements for information and records management by the new IT environment. This should include a focus on key risk areas such as email and One Drive usage.	M
8	Provide a route for the consistent consideration of information management and digital continuity requirements in the course of IT procurement, change and decommissioning pipelines.	M
9	Continue to work closely with The National Archives to develop a robust approach to the appraisal, selection, sensitivity review and transfer of digital records	M

Key highlights

- The following are among the effective approaches identified in the course of the MHCLG IMA, which other government organisations may find helpful:

Summary of good practice approaches identified	
Defining roles and establishing governance structures	<p>MHCLG has defined the role of line managers in resourcing information management activities, and ensuring that staff follow procedures and guidance.</p> <p>Since the DCLG IMA, KIM staff have invested real effort in building a network of Business Records Officers to support information management activities, and to help communicate messages from the centre. A member of Records and Information Governance Services holds the role of network lead. MHCLG provides Business Records Officers with regular updates, intranet guidance, ad-hoc workshops and quarterly meetings with question and answer sessions.</p> <p>MHCLG is supporting the development of professional skills within the KIM team, with staff given the opportunity to study to achieve information and records management qualifications, gain accreditation from professional bodies and attend conferences and training events.</p>
Policy and guidance	Policy documentation is current and principle led, and clearly conveys how good records management practice supports effective decision-making and service delivery. Policies and guidance are on the MHCLG intranet and are easy to find. KIM staff have also started

	<p>blogging about the importance of information and records management to raise staff awareness.</p> <p>In recognition of the potential impact of General Data Protection Regulation implementation and the roll out of Office 365, MHCLG established a policy review work plan. This identifies the location, subject and owner of all records related policy and guidance issued by Records and Information Governance Services. Each document was allocated one of six potential review schedules. MHCLG also used this to map areas where new policy or guidance may be required and to identify guidance and instructions produced by other business areas that factor in KIM principles and may need revision.</p>
Transfer to The National Archives	<p>Each year, MHCLG defines a set of primary targets to enable the transfer of selected records to The National Archives within legal deadlines. It is also looking ahead and seeking to smooth out peaks in volumes for review. It factors these into a set of secondary annual targets, which are intended to allow workloads to be evened out through to the point when the 20-year rule comes into force in 2023.¹</p> <p>MHCLG recognises that early digital duplicates of paper records may offer additional value and aims to work with The National Archives to identify potential options for selection and transfer.</p>
Appraisal, selection and review process	<p>MHCLG has an appraisal and selection policy in place to support decision making. It makes active use of macro-appraisal principles, drawing on Official Selection Policies, titling and previous selection decisions to inform review work. The records team maintains a spreadsheet based decision log, which is continually updated.</p>

¹ <http://www.nationalarchives.gov.uk/about/our-role/plans-policies-performance-and-projects/our-projects/20-year-rule/>

Detailed findings of the assessment

1 Strategic planning and risk

Key developments in this section since closure of the DCLG IMA

- MHCLG has produced a data strategy. A digital strategy is in draft. This aims to build the department's digital policy capability and modernise how it works through the provision of improved IT tools.
- The KIM team now has oversight of the shared drives and has started using The National Archives' Digital Record Object Identification (DROID) file format profiling software tool.

1.1 Improving information management capability

Rating: Development area

- MHCLG recognises that high staff turnover, a need to operate at speed and a reliance on personal drives and email inboxes to manage information has meant that important records have not been consistently saved to its shared drives. Interviewees described difficulties finding information, with one member of staff highlighting an instance where their team had been unable to identify and understand the basis for key past decisions due to a gap in records held. The IT Modernisation Project and planned roll out of Office 365 have the potential to address the limitations of the current IT environment, removing the technical barriers to good information management that are a recognised factor in limiting the department's performance in this area.
- However, while individual staff we interviewed recognised the value and sensitivity of the information they worked with, we note that information management has historically had a low profile within the department and there has been limited engagement at a senior level. We recommend that MHCLG puts in place a plan to promote an improved information management culture. This should be driven from the centre and receive meaningful top-down senior sponsorship. **See recommendation 1**
- This plan should form a central element of the KIM strategy that Records and Information Governance Services intend to establish. MHCLG should align strategic goals for KIM with a clear vision and define the role that information management will play in enabling change as it seeks to challenge ingrained behaviours and introduce new ways of working (see page 8). Strategic goals should be ambitious in tone and reflect the transformative focus of the department's digital strategy. **See recommendation 1**

1.2 Controlling legacy information

Rating: Development area

- MHCLG is taking key initial steps that will enable it to gain control of its holdings of unstructured information. It has identified and separated out non-current

information within its shared drives including orphaned structures. It is working with the business to recover data held on legacy storage media including floppy discs and compact discs.

- MHCLG has undertaken some compliance focussed work to identify its oldest digital information (see page 11). It is now hoping that it will be able to use DROID and potentially other tools to start to gain an overall understanding of the information it holds. MHCLG aims to identify duplicates and redundant, obsolete and trivial material so that it can be deleted. While this is positive, and represents a key potential means of reducing the digital continuity threats MHCLG is facing, the department currently lacks an overall plan to direct this work and to ensure information with value to the department is identified so that it can be controlled and exploited. MHCLG should address this, including formally defining options to improve its ability to access its digital legacy. **See recommendation 2**
- The department should bring action taken in relation to legacy user accounts and the department’s email archive within the scope of this plan. We recognise that closure of the email archive, while not resolving the problem, has placed a limit on it. The fact that disposal was not enacted on the email archive at least ensures that information with value will have been retained within it. **See recommendation 2**

1.3 Identifying information management risks	Rating: Development area
---	--------------------------

- Some information management related risks feature on Records and Information Governance Services and IT Modernisation Project risk registers. However, as currently set out, these do not support effective communication of key potential threats and their causes. MHCLG as a department has also made no overall consolidated assessment of the risks raised by information management. This is despite the potentially significant impact in terms of costs incurred, reputational damage and missed opportunities to support greater efficiency and effectiveness, if information is not available as required or not disposed of as needed.
- MHCLG is currently working to increase the capability of its corporate centre in relation to risk as well as in relation to commercial and digital activities. In this context, and in view of the levels of IT, digital and wider organisational change the department is undergoing, it is important that it improves its understanding of information management related risks. MHCLG should ensure that business areas identify the risk of non-compliance with information management policy. **See recommendation 3**

2 Current IT systems and technical change

Key developments in this section since closure of the DCLG IMA
<ul style="list-style-type: none"> • MHCLG has defined its business requirements for information management and is seeking to deliver them through the IT Modernisation Project.

- MHCLG's shared drive environment will continue to raise a range of information availability, integrity and potentially confidentiality related threats to the department until it migrates off them. These stem from the fact that shared drives do not support routine information management processes and do not protect information from accidental or unauthorised alteration, copying, movement or deletion.
- Where possible, MHCLG is planning to promote open access to information in Office 365. This contrasts to the situation in the current IT environment where access permissions are generally locked down at a team level and will represent a significant departure for the department. Getting this right and ensuring that permissions are set appropriately will be critical to ensuring the business gains full discovery related benefits from adopting an E5 licence. **See recommendation 7**
- The department recognises the problems caused by the retention of business information outside shared areas, and is working to restrict email inbox sizes. However, it has not imposed limits consistently and staff remain reliant on email/personal repositories for sharing and finding information.
- MHCLG intends to adopt an-out-of-the-box approach to Office 365 and hopes that ease of use and new opportunities for collaborative working will help address this issue. Its intention is that the totality of information for individual projects will be stored in a single location, providing a knowledge base from a single source and improving version control. However, ingrained behaviours, the ability to send large attachments, and the need to work across departmental boundaries mean that email deserves ongoing attention as an area of risk. The likelihood that information with value is held outside shared areas may also be increased by the greater email capacity in Office 365 and the fact that staff will need to save any emails they wish to capture onto their desktops before moving them into a shared area. **No decision had been reached at the time of the IMA on the use of third-party plugins to reduce this technical barrier to email capture. See recommendation 7**
- There is an additional potential concern that staff may hold information with business and potential historical value in One Drive Accounts. At the time of the IMA, MHCLG was planning to tackle this through policy statements that only personal information should be stored in this location, and central scrutiny of account sizes with targeted interventions. The ease of sharing information from One Drive and current difficulties in policing and restricting storage of information in personal repositories suggests that these approaches by themselves may not be sufficient. **See recommendation 7**
- MHCLG should exercise caution in considering the application of disposal rules to One Drive and email accounts (for example after staff leave) until it is able to demonstrate that information with value is being held in shared areas as a matter of course. **See recommendation 7**

2.2 Technical change	Rating: Development area
-----------------------------	--------------------------

- We were told that MHCLG worked actively to factor information management requirements into the IT Modernisation Project from the outset. It has set up a specific project work stream to look at SharePoint design.
- While this is very positive, MHCLG has no formal mechanism to ensure that information management considerations are factored in routinely and at an early stage to business as usual IT procurement, change and decommissioning processes. MHCLG needs to address this. **See recommendation 8**

3 Control and oversight of current practice

Key developments in this section since closure of the DCLG IMA

- Records and Information Governance Services has moved into the newly formed Digital directorate and a member of Records and Information Governance Services is seconded to the IT Modernisation Project.

3.1 Defining roles and establishing governance structures	Rating: Satisfactory
--	----------------------

- We saw evidence that a number of business areas are seeking to improve the way information is exchanged and controlled through the creation of templates, workflows and desk notes. However, business areas were not always factoring information management principles, such as what records they need to capture, into this work. This represents a missed opportunity. MHCLG should seek to build on the involvement of KIM staff in the IT Modernisation Project and define options for a new and more active central support model that is better placed to engage with and drive such business initiatives. **See recommendation 4**
- The move of Records and Information Governance Services into the newly formed Digital directorate has been a very positive step, and has improved the relationship between KIM and IT and increased senior engagement. **This marks real progress since the DCLG IMA.** It places KIM staff in a potentially strong position not only to support the roll out of Office 365 and work to embed good working practices, but also to support compliance with the Public Records Act as the context shifts from paper to digital records. MHCLG should build on its existing work to professionalise KIM staff and define a plan to increase digital skills. **See recommendation 4**
- Well-established arrangements are in place to support MHCLG’s network of Business Records Officers (see highlights table, page 4). MHCLG is now looking to replace the Business Records Officers with a new rebranded and refocussed role in advance of the move to Office 365. While this is a positive step, based on the requirements set out to us during the IMA, the new role will continue to have an administrative and system support focus. A more ambitious approach may be needed. In our view, neither the Business Records Officer

role nor its successor is likely to be well placed to drive culture change and ensure staff embrace the opportunities of the new IT environment including open access principles. We recommend that MHCLG should establish a more senior championing role to sit above this to drive engagement over the long term and provide a basis to transform culture and sustain change. **See recommendation 4**

3.2 Promoting policy and guidance	Rating: Satisfactory
--	----------------------

- MHCLG’s policy provision is currently working well in overall terms (see highlights table, page 5). However, MHCLG’s reliance on business areas to capture the record of interaction with ministers’ private offices on policy development and implementation may be opening the department up to risk. This is in view of current inconsistent levels of information management practice. MHCLG should seek assurance that business areas are preserving this record and if there is doubt, it should consider changing its approach or introducing additional controls. It should also address Sir Alex Allan’s recommendation made in his *Review of Government Digital Records* that any hard copy annotated records should be scanned and retained to ensure original manuscript comments are captured verbatim.² **See recommendation 5**
- Training will be crucial to encourage the right behaviours around use of the new IT environment. The promotion of good information management principles and requirements should form part of this. At the time of the IMA, the business change team was developing IT Modernisation Project related training. KIM staff did not appear to have been linked in. This is a significant concern and needs to be addressed. **See recommendation 5**
- It is positive that MHCLG’s guidance on What to Keep covers raw datasets, statistical results, published reports and analysis. Given MHCLG’s growing and evolving consumption and use of data, currently identified retention schedules may not be sufficiently granular. Current work to draw up a data catalogue offers considerable potential benefit to MHCLG in providing an audit trail of inputs and outputs and recording a lineage of decision making. We strongly support this work. We recommend that it should be taken forward with engagement from the KIM team with a view to reviewing and revising the current line on what needs to be kept. **See recommendation 5**

3.3 Monitoring current practice	Rating: Development Area
--	--------------------------

- While KIM staff seek to identify and target individual staff who are holding high volumes of information outside shared areas, MHCLG has no approach in place to monitor information management capability. This is in contrast to most IMA programme members. MHCLG needs to address this as part of the move to Office 365. Doing this will help underpin the work this report recommends MHCLG undertakes to encourage greater business ownership of information management practice. **See recommendation 6**

² <https://www.gov.uk/government/publications/government-digital-records-and-archives-review-by-sir-alex-allan>

4 Compliance

Key developments in this section since closure of the DCLG IMA

- MHCLG has amended processes in view of the transition to the 20-year rule and continues to transfer records in line with legal requirements under the Public Records Act.

4.1 Transfer to The National Archives

Rating: Good

- MHCLG continues to plan on a good practice basis for the transfer of paper records to The National Archives (see highlights table, page 5). It also recognises that, while paper transfers will continue for a number of years, digital records are now within scope. It is due to make its first hybrid digital and paper transfer in 2018.

4.2 Appraisal, selection and sensitivity review process

Rating: Satisfactory

- Clear appraisal and selection processes are in place for paper (see highlights table, page 5) and the records team has regular meetings to discuss current review work and discuss future priorities. We were told that staff working on inquiries are being buddied up to support better knowledge sharing.
- In 2018 MHCLG ran a report run identifying all files on its shared drives and carried out an assessment of 4,000 digital records dating from 1987 to 1992 (based on date last modified) that were putting the department in breach of its legal responsibilities under the Public Records Act. This material was held in a single shared drive and had already been identified as having no known current business value, following consultation with the business. It was deleted following an assessment against the department's selection criteria for any potential historical value and a further search for material relevant to the Independent Inquiry into Historical Child Sexual Abuse and the Grenfell Inquiry.
- MHCLG holds 15,000 documents dating from 1993 and 1994 that it needs to process in 2018. These include records on additional drives that have not yet been assessed for any ongoing business value. MHCLG should engage with The National Archives as it seeks to understand their value and identify appropriate disposal options. MHCLG will need to seek a retention instrument to cover any digital records that it will not process by the end of 2018.
- Over 56,000 records dating from 1995 and 1996 will need processing in 2019. We emphasise that MHCLG needs to define its approach for digital review to maintain the current positive level of performance recognised under this report heading. This includes solidifying plans to begin looking beyond records due for transfer in year. **See recommendation 9**

Annex 1 – Recommendations with proposed supporting actions

- Recommendations consist of an overall outcome MHCLG needs to deliver through the period of its IMA action plan and a set of supporting actions that will help address the recommendation.

Recommendation 1	priority
In support of the Digital strategy and IT Modernisation Project, establish meaningful and forward facing strategic principles and a vision for knowledge and information management. There should be a strong focus on driving improved information management behaviours.	H
<p>This would be supported by:</p> <ul style="list-style-type: none"> • Nominating an overall Board level champion for knowledge and information management to support key initiatives and help drive business engagement. • Gaining Board level endorsement for the strategy. • Ensuring the strategy is time bound with a plan for implementation and an agreement to report on progress to Board level at defined intervals. • Strategic goals should be ambitious in tone and reflect the transformative focus of the department’s digital strategy. 	

Recommendation 2	priority
Define an overall plan to establish control of the department’s holdings of poorly organised and unstructured legacy digital information. This should enable disposal of material that no longer needs to be retained, exploitation of information with value, and management of digital continuity threats.	H
<p>This would be supported by:</p> <ul style="list-style-type: none"> • Ensuring the plan is resourced in terms of skills and technology/tools – and defining options to increase its ability to search and discover its legacy, in situ or via the department’s E5 Office 365 licence. • Factoring in user accounts and the email archive within scope. • Placing specific emphasis on: <ul style="list-style-type: none"> ○ Ensuring the survival of records with historical value. ○ Enabling efficiency and effectiveness through better access to information and knowledge resources. 	

- Reducing potential cost burden of litigation.
- Helping ensure availability of information needed for inquiries.

Recommendation 3	
As part of current work to increase the capability of the department's corporate centre, establish an overall consolidated definition of the information management related risk that the department faces.	H
<p>This would be supported by:</p> <ul style="list-style-type: none"> • Adding information management risk to the digital directorate risk register in view of the need for joint ownership of mitigating activities by KIM and DDAT professionals. • Drawing on good practice risk descriptions established by IMA programme members including Cabinet Office, Department for Transport, HM Revenue and Customs and Ministry of Justice. • Ensuring that risk descriptions cover the risks raised by current practice and IT environment and those relating to legacy holdings (including digital continuity risks). • Establishing the expected mitigating role of the IT Modernisation Project and work to gain control of digital holdings so that progress to reduce and manage risks can be tracked. • Ensuring that business areas define (at an appropriate level on risk registers) the threats raised if their staff do not capture and manage information as set out in corporate policy. • Reviewing, revising and improving the quality of risks statements, assessments of impact and probability and levels of residual risk included on the Records and Information Governance Service and IT Modernisation Project risk registers. 	

Recommendation 4	
Define options for a new governance model for information management in the new IT environment that can drive business engagement and ownership of information management practice. The central resource should be positioned to coordinate capability building activities.	H
<p>This would be supported by:</p> <ul style="list-style-type: none"> • Establishing the role of senior staff in ensuring good information management practice and factoring information management into director's assurance statements. 	

- In line with the best practice approaches adopted by IMA programme members including Cabinet Office and HM Treasury, introducing a specific championing role in the business to work with the central team and encourage and embed good practice.
- Establishing a plan to increase digital skills of KIM staff and make full use of digital tools and approaches.

Recommendation 5	
Ensure that KIM staff play a central role in both developing and promoting the policy and guidance principles that will help shape how information is managed in the Office 365 environment.	H
<p>This would be supported by:</p> <ul style="list-style-type: none"> • Factoring KIM staff into the development and running of IT Modernisation Project related training now and as the department moves to embed the Office 365 environment. • Defining steps needed (for example as a component of KIM strategy) for the retention and management of data to ensure it can be used and exploited as long as needed: <ul style="list-style-type: none"> ○ KIM staff should engage and support work to establish a data catalogue, reviewing current What to Keep guidelines to ensure they fit the way the department is and needs to exploit data in support of policy creation and implementation. • Reviewing processes for private offices to ensure that hard copy annotations are preserved in line with recommendations made by Sir Alex Allan in 2015. • Reviewing and risk assessing the current model which relies on policy areas preserving the evidence of policy interactions with ministers. 	

Recommendation 6	
Develop an approach to monitoring, assessing and reporting on information and records management practice.	H
<p>This would be supported by:</p> <ul style="list-style-type: none"> • Exploring the best practice approaches adopted by IMA programme members including Cabinet Office and HM Treasury, with particular emphasis on: <ul style="list-style-type: none"> ○ Board level engagement and sponsorship of the process as a means of ensuring MHCLG is able to exploit its information effectively. ○ Establishing senior staff as customers of the process. • Ensuring that MHCLG is able to benchmark performance so that it can: 	

- identify business areas (at a proportionate level) which are underperforming and set clear expectations for improvement.
- spot examples of good practice and that can be championed and shared.

Recommendation 7	
Establish a framework to enable continued assessment of the delivery of business requirements for information and records management by the new IT environment. This should include a focus on key risk areas such as email and One Drive usage.	M
<p>This would be supported by:</p> <ul style="list-style-type: none"> • Drawing on the experiences of other departments who have recently moved to new IT environments to flesh out a migration plan and identify what information needs to be moved into the Office 365 environment in the first place. • Reviewing steps other departments are taking to limit and control retention of information in personal spaces including email and OneDrive, both from a technical and cultural point of view. Targeted interventions where individuals are retaining high volumes of information are unlikely to be sufficient by themselves. • Delaying any decision on the automated application of disposal rules on One Drive until consistent levels of compliance with information management policy can be demonstrated. Alternatively, MHCLG may need to apply additional controls such as the use of e-Discovery tools to provide confidence that information with value will not be lost. • Monitoring levels of email capture if a decision not to use third-party plug-ins is taken, so that it can be reconsidered after a set time • Building effective search and discovery into its strategic approach for KIM, both from a team and an organisational perspective. 	

Recommendation 8	M
Provide a route for the consistent consideration of information management and digital continuity requirements in the course of IT procurement, change and decommissioning pipelines.	
<p>This would be supported by:</p> <ul style="list-style-type: none"> • Establishing a requirement to engage KIM staff as a matter of course. 	

Recommendation 9	
Work closely with The National Archives to develop a robust approach to the appraisal, selection, sensitivity review and transfer of digital records.	M
<p>This would be supported by:</p> <ul style="list-style-type: none"> • In line with wider work to gain control of and exploit legacy digital holdings, seek opportunities to begin looking beyond records approaching legal deadlines for review and transfer. • Working jointly to identify potential candidates for early transfer. • Seeking a Retention Instrument for any digital records from 1993 and 1994 that will not be reviewed and disposed of by the end of 2018. 	