Public Sector Records Management
A Practical Guide

Kelvin Smith
PUBLIC SECTOR RECORDS MANAGEMENT
For Nicola, Jennifer and Karen
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Kelvin Smith

ASHGATE
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I have spent all my working life in records management and archives administration. I have enjoyed (almost!) every minute of it but that would not have been possible without the help and support of so many people. In many ways this book is an acknowledgement of that support, particularly from The National Archives and its staff over the past forty years.

In putting the following chapters together I have called upon much of the work that I have undertaken over the past few years as part of my official duties. I am grateful to The National Archives for their permission to take my work forward into this book. In addition I have been able to develop many of the ideas in practical situations through working with some excellent organisations – not least Liverpool University Centre for Archive Studies (superbly run by Caroline Williams and Margaret Procter), the International Records Management Trust (driven by the indefatigable Dr Anne Thurston), and the Records Management Society, whose large membership has regularly been a source of lively debate. My thanks to them all.

I am grateful to the following organisations for permission to use relevant documents:

- University of Newcastle upon Tyne – Survey questionnaire.
- Bedfordshire and Luton Records and Archives Services – collection policy.
- Norfolk Record Office – archive collecting policy.
- Westway Development Trust – file plan.

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Thame
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Introduction

Records management is a subject that has become more interesting over the last few years. It has always been an asset for efficient and effective business and it may seem strange that this highly significant driver of business efficiency has received so little attention over the years. Organisations, however, concentrated on their core functions and were reluctant to commit scarce resources to what was viewed as a support function. From 1997 a significant driver in the United Kingdom in the shape of proposed Freedom of Information legislation brought records management sharply into focus. This was soon joined by another important driver, initially in the government sector but soon to spread further – electronic business and the need to manage electronic records effectively.

AIMS

The aim of this book is for it to be practical. It is intended for people who know little or nothing about the subject, or who have read the theory and now want to know how to put it into practice. While recognising different theories, it does not dwell on the academic arguments but puts forward basic principles and procedures, drawing on best practice from many sources. There seems little point in dwelling on ‘what is a record?’, ‘what is the difference between records management and archives administration?’ and similar questions. If you accept the aim stated here, this should not worry you. You know the answers to such questions and will want to get on and undertake records management.

There is also an attempt to include an international flavour to the book, particularly bearing in mind the countries of the Commonwealth, which are familiar with British official practices and procedures. The effective management of records and archives throughout their life cycle is a key component of national development. Unorganised or poorly managed records mean that government does not have ready access to authoritative sources of administrative, financial
and legal information to support sound decision making or the delivery of programmes and services. Nor does it have the means of holding itself accountable for what it does or upholding the rights of its citizens.

**FRAMEWORK**

It will come as no surprise that the framework that follows is based very much on the information life cycle. After some basic discussion of The records management function and Compliance and regulation (chapters 1 and 2) it follows the pattern of Record creation and classification, Records maintenance, Records appraisal and Archiving (chapters 3 to 6). The next three chapters (7 to 9) examine some of the underpinning issues – Access to records, Roles and responsibilities and Training and development. It finishes with some suggestions for Developing an integrated programme for developing records management in your organisation (chapter 10).

**BACKGROUND**

Much of the guidance and advice that follows has its origins in The National Archives (where the author has spent all his working life). Nearly all of this is aimed at central government but it nonetheless has great significance and relevance to other parts of the public sector.

It should always be remembered that the main driver for good records management is business efficiency. In this respect the international standard ISO 15489 is a most important document. It was developed in response to a consensus within the international records management community to standardise international best practice using the Australian Standard AS 4390, Records management, as its starting point. It focuses particularly on the business asset that records provide to an organisation and emphasises that a good records management system will result in a source of information about business activities that can support subsequent activities and business decisions and can ensure accountability to stakeholders.

Another crucial and pivotal document for records management in the United Kingdom is the Lord Chancellor’s Code of Practice on the Management of Records under section 46 of the Freedom of Information Act 2000. See Appendix 1 for a full copy. This is referred to at several points in the text and is itself written in the context of the information life cycle. Shortly after the Code was published (November 2002), model action plans were developed on behalf of UK public authorities. Experience with the development of these model action plans has formed the basis of much of what follows. The framework of the chapters is
closely aligned to the nine steps that are advocated by the action plans. It seems worthwhile, therefore, to describe each of those steps.

1 THE RECORDS MANAGEMENT FUNCTION

Records management should be a function that is recognised as a specific corporate programme. It should have clearly defined responsibilities and objectives, and have the organisational support to ensure effectiveness. It ought to be on the same level as other generic functions – such as finance, human resources, health and safety, etc. A champion at Board level should oversee the function, ensuring top-level support and encouragement.

2 ROLES AND RESPONSIBILITIES OF RECORDS MANAGERS

An organisation should appoint a member of staff of appropriate seniority to have lead responsibility for records management – for all records of the authority (in whatever format) from the moment that they are created to their ultimate disposal (whether by destruction or permanent transfer to an archive). The person must have enough authority to be able to ensure implementation of accepted records management policies and procedures.

3 RECORDS MANAGEMENT POLICY STATEMENT

Organisations should have in place a records management policy statement that is endorsed by top management and made known to all staff. It is the manifestation of the authority’s commitment to records management and a mandate for all related actions. It should be a clear and concise statement, able to be read and easily understood by everyone in the organisation.

4 TRAINING AND AWARENESS

Staff directly engaged in the records management function should receive the appropriate training. All other staff should be aware of their record keeping responsibilities. The immediacy of freedom of information legislation means that staff at the records creation stage have to be careful with their filing and be more aware of file plans, retrieval and disposal, and all those other records management functions that are likely to affect the handling of requests for information.

5 RECORDS CREATION AND MANAGEMENT

Organisations should have in place an adequate system for documenting their
activities – otherwise known as a records classification scheme or file referencing system or file plan. Their records should be part of a standard, authority-wide system so that everyone in the organisation can find what information they need, when they need it, and if there are regular staff movements, individuals do not have to learn a different system.

6 RECORD MAINTENANCE

Storage accommodation for the records – active and closed – should be clean and tidy and handling procedures should be in place that will minimise damage to the records.

7 RECORD DISPOSAL

When information is no longer required, its destruction should be documented. This will enable organisations to meet any requests regarding information that has been so dealt with – to assure the public that official information is being destroyed in accordance with proper procedure and practice. The most effective method of documentation is by the use of disposal schedules.

8 ACCESS

A more accurate description of this step might be ‘Tracking’ – freedom of information requests have to be logged and tracked. This has three main purposes: 1) giving the organisation the required information to handle appeals against non-disclosure; 2) monitoring the twenty working day deadline (in the UK Freedom of Information Act); and 3) promoting consistency across particular parts of the public sector.

9 PERFORMANCE MEASUREMENT

The last step in developing good record keeping is to ensure that, when a records management system is in place, it is operating effectively. The system’s performance should be monitored, or measured. A series of performance indicators ought to be agreed between the records manager and business managers to enable this to be done.

I hope you find this book useful. Its intention is to be very practical and it is aimed at those in public sectors (in the United Kingdom as well as other countries) who want to get on and undertake records management. It is also for those who have records management problems and want to do something about them.
The records management function

AIMS

This chapter takes an overall look at the function of records management. It examines its organisational context and the key principles such as the life-cycle concept and policy development.

Inevitably, we have to start with a little theory…

RECORDS AND INFORMATION

There have been many debates – academic and otherwise – on the definition of a record, and on how records differ from information and knowledge. For you, the practitioner, the most important distinction is probably between documents and records. The difference between these two is a matter of context. A document can stand alone; it does not depend on other relationships; it can be identified and interpreted without having to see it in the context of its relationship with other documents. Thus, documents are records without context and records are documents with context.

Records are essential to the business of all organisations. They document the work of public authorities and private companies, support their operations and form the basis for the many services that are provided by them. They are essential to effective operations in several respects:

- Supporting the delivery of services – you will want to document how policies and statutes are carried out, what services were provided, who carried out the work and how much it cost, and, in the longer term, your organisation’s accomplishments.
- Supporting administration – by providing information for the direction, control, decision-making and coordination of business.
● Documenting rights and responsibilities – your organisation needs to provide evidence of the scope of its terms of reference, evidence of what it owns and evidence of its obligations. Records are important also in documenting the rights of corporate bodies and individuals in matters such as ownership, legacy, etc.

● Legal documentation – many records comprise formal legal documents – regulations, local orders, etc. – or formal documentation of the relationship between governments and people or institutions. They may, in this respect, be used in legal undertakings or be required for evidence in a court of law.

● Evidence of the work of public authorities – your organisation needs to document the decisions, actions and obligations that it undertakes, and in this way provide accountability measures.

● Future research – some of the records your organisation creates and uses will be preserved and will form the contents of archival establishments, providing important historical information on political, social, economic and other issues.

Records are therefore created or received in the conduct of business activities and provide evidence and information about those activities. They come in all kinds of format and media. A formal definition of a record might be:

Recorded information produced or received in the initiation, conduct or deletion of an institutional or individual activity, and which comprises sufficient content, context and structure to provide evidence of an activity, regardless of the form or medium.\(^1\)

In the United Kingdom central government all departments and agencies are moving quickly towards the creation, storage, maintenance and retrieval of their records and information solely in electronic form. Paper files and folders are becoming increasingly rare in these organisations. In other areas of the UK public sector, however, while many records are created electronically they are maintained in paper form – often filed systematically but just as often managed in personal systems. Records may also be created on media other than paper or electronic – microfilm, microfiche or computer output microform (COM); or as photographs (prints, negatives, transparencies and x-ray films), sound recordings on disk or tape or moving images on film or video. In some cases records might be in the form of three-dimensional models, scientific specimens or other objects. A set of records, in context, may be in more than one of these formats or there may be close organisational relationships between records in different formats.

\(^1\)International Council on Archives, 1997.
THE MANAGEMENT OF RECORDS

Records management provides a framework that aims to ensure that:

- **The record is present** – your organisation should ensure that it has the information that is needed so that it can reconstruct activities or transactions that have taken place. This ensures that the organisation is accountable to its stakeholders (whether they are citizens, parliament or shareholders).

- **The record can be accessed** – the people in your organisation must be able to locate information when required. This is vital in areas where there is freedom of information legislation but just as important to support the efficient operation of the organisation’s business.

- **The record can be interpreted** – if required, your organisation must be able to establish a record’s context, who created it, as part of which business process and how it relates to other records. This is a vital part of the organisation’s accountability and transparency.

- **The record can be trusted** – when you and your colleagues are consulting a record, you need to be assured that it reliably represents the information that was actually used in or created by the business process, and its integrity and authenticity can be demonstrated. Records provide the ‘official’ evidence of the activity or transaction they document and must therefore be reliable and trustworthy. The reliability of a record is linked to its creation. Who generated or issued the record and under what authority? Can this authority be proved? Not all records have official stamps or seals. The continuous safekeeping of records will also protect their reliability. For example, if the official version of the minutes of a meeting is filed by the records manager and thus protected from change, the unauthorised version will not form part of the official record. This issue of reliability is especially important in the context of electronic records and information.

- **The record can be maintained through time** – your organisation will need to ensure that the qualities of accessibility, interpretation and trustworthiness can be maintained for as long as the record is needed. During its creation a record will develop and change. For example, minutes of a meeting will be produced in draft form and reviewed by the members of the committee before being approved. Once this process of creation is finished the record must be fixed and must not be susceptible to change. If a record is changed or manipulated in some way, it no longer provides evidence of the transaction it originally documented. For example, if someone alters the minutes of a meeting after they have been approved, the minutes can no longer be considered an accurate record of the meeting. This is another issue that becomes more important in an electronic context.
The record will be disposed of as part of a planned system, through the implementation of disposal schedules to ensure the retention of the minimum volume of records consistent with effective and efficient operations. Is your organisation keeping more records than it needs? This is the case in very many organisations. The information that does not need to be kept – let’s call it rubbish – gets in the way of the important information.

The following principles underpin the management of records.

**RECORDS ARE A CORPORATE RESOURCE**

Records form part of the corporate memory of an organisation and are a valuable corporate resource. From the point at which a document is created as a record and used in the course of official business, it becomes corporately owned. The records you and your colleagues create and use don’t belong to you – they belong to the organisation. They are not kept in your or their filing cabinets or on your computers – they are kept in the organisation’s filing cabinet or on the organisation’s computer. These cabinets and computers are not even in your or your colleagues’ offices – they are in the organisation’s office.

**ELECTRONIC RECORDS**

Electronic records that are generated by or received in an organisation in the course of its business are in this context no different from any other records – they are official, corporate records. Although most current practice is still to print electronic information to paper, your organisations should be making plans to maintain their electronic information as electronic records. In the United Kingdom, policies on modernising government mean that public records must be stored and retrieved in electronic form and their structure must enable that to happen. In any event records should be organised in a way that is able to meet anticipated future business and archival needs, and be reliably and consistently grouped regardless of media.

**RECORD KEEPING SHOULD BE INTEGRATED WITH BUSINESS PROCESSES**

Records management and archive administration must be built into systems for creating records, to ensure that they are capable of capturing records with all the necessary contextual information. This is vital because you will need to refer to them in the medium, and sometimes longer, term – and this will be regardless of whether they are in paper, electronic or any other form.
RECORDS SHOULD BE RELIABLE, AUTHENTIC AND COMPLETE

Records should be able to function as evidence of business activities and processes through sound record keeping practices. In order to be reliable and authentic they must adequately capture and describe the actions they represent and once created must not be altered without creating a new record. To be considered complete the record should preserve not only content but also the context in which it was created and used, and links to other records.

RECORDS SHOULD BE ACCESSIBLE

Record keeping systems should aim to make records available quickly and easily to all staff and to others who are entitled to access or information from them. Information is the life blood of any organisation; yours or any other cannot hope to function effectively without it.

RESPONSIBILITY FOR CAPTURING, MAINTAINING AND ENSURING ACCESS TO RECORDS RESTS WITH THE ORGANISATION AS A WHOLE

Responsibility for the capture and maintenance of records rests with everyone in the organisation, and all staff should ensure that they are familiar with and are adhering to the records management policy and any procedures and guidelines that are issued through it. Good record keeping is not just the province of the records manager – it’s everyone’s responsibility.

THE ORGANISATIONAL CONTEXT

There are two essential elements to the function of records management:

- it covers records in all formats (paper, electronic, oral, film, microform, etc);
- it covers records from the moment that they are created until their disposal (either by destruction or preservation in an archive).

Records management is a corporate function in a similar way to human resources, finance and estates management. It should be recognised as a specific corporate programme within an organisation and it should receive the necessary levels of organisational support to ensure effectiveness. The function needs to bring together responsibilities for records in all formats from their creation to their ultimate disposal. All organisations produce records but many do not have a designated records manager with prime responsibility for ensuring an effective and efficient approach to managing records and information across the organisation.
The person or persons responsible for the records management function in your organisation should also have responsibility for, or close organisational connection with, the person or persons responsible for other information management issues, such as freedom of information, and privacy/data protection. This organisational connection should also be extended towards information and communication technology (ICT) units. For example, in the design of information management systems – from simple databases to electronic records management file plans – both the records management and ICT professionals have important roles to play. Such cooperation will ensure a coordinated and consistent progress towards the implementation of effective records and information management systems that accord with legislation and business practices, and will ensure that the best use is made of the latest technology. The person with responsibility for records management should be someone of appropriate seniority, someone who knows the organisation well and can promote and implement the functional requirements. Everyone in your organisation should know who the records manager is. The role needs to be formally acknowledged and made known throughout the organisation – from top to bottom.

The precise location of the records management function in an organisation’s hierarchy is largely a matter for local determination. The important thing is that it is recognised as a corporate function.

In this context management studies have provided numerous models for organisations. Among the most common are:

- functional
- divisional
- centralised services.

**FUNCTIONAL**

The functional structure is arranged according to the key functions of the organisation. Each function is represented by a department that has its own manager who reports to the head of the organisation.
DIVISIONAL

In a divisional structure the business units are arranged, for example, according to geographical areas. The range of functions is then provided within each area.

CENTRALISED SERVICES

The centralised services structure revolves round a unit that brings together all the specialised services that other business units will need.

Where would the records management function fit into such organisations?

You could argue:

- Functional: a separate department on a par with HR, Finance, etc.
- Divisional: regional records managers reporting to a member of the management board
- Centralised services: a unit under central services on a par with Finance, HR, etc.