

# RECORDS MANAGEMENT POLICY


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# OBJECTIVES OF A RECORDS MANAGEMENT POLICY

- ▶ Good records management starts with a policy which reflects an organization's needs.
- ▶ The objective of the policy should be the creation and management of authentic, reliable, complete and usable records which are capable of supporting business functions and activities of the organization for as long as they are required.

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- An organization should formulate and communicate its records management policy, set out the organization's intentions on records management and identify a senior staff member(s) who will lead with responsibilities for records management to enhance governance in this aspect.
  - A records management policy should be underpinned by procedures and guidelines for compliance by staff.

# Elements of a Records Management Policy

- 1. Purpose
- 2. Definitions of Keywords
- 3. Scope of the Policy
- 4. Legislative Framework and Standards
- 5. Roles and Responsibilities of Record Keeping
- 6. Management of Records (Creation, storage, security etc)
- 8. Disposal and Destruction of Records
- 9. Audit and Review
- 10. Acknowledgements
- 11. Appendix A

# Public Records Management Policy

The public records management policy requires the implementation in each government department of a comprehensive records management programme that will;

- ❑ make and keep full and accurate records as long as they are required;
- ❑ minimize the costs of managing public records;
- ❑ provide quality services to users;
- ❑ provide necessary security for government information;
- ❑ facilitate public access to records and information that encourages better understanding of government policies and operations; and
- ❑ identify, preserve and provide access to archives that have continuing or permanent value for research, educational, cultural and other related purposes.



## **SAMPLE OF A RECORDS MANAGEMENT POLICY**



# RECORDS MANAGEMENT RESPONSIBILITIES

Defining and assigning records management responsibilities and promulgating such responsibilities within an organization are crucial to good records management and to meeting the needs of internal and external stakeholders.



The authorities and responsibilities for records management of different employees within an organization should also be clearly defined, including senior management, records managers, records management staff and all staff who create, receive and keep records as part of their daily work.



## **Good practices**

- ▶ An organization should:
  - ❖ formulate and promulgate its records management policy, e.g. in the form of records management policy statement setting out what the organization intends to do in respect of records management;
  - ❖ formulate and promulgate records management requirements, guidelines, procedures and best practices for compliance and reference by its staff;
  - ❖ review and improve records management policy, recordkeeping systems, practices, guidelines and procedures whenever appropriate;



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- ❖ develop and provide records management training for its staff;
  - ❖ designate a senior officer as Corporate Records Manager to oversee its records management and to establish and implement a proper records management programme within the organization;
  - ❖ designate Assistant Corporate Records Manager(s) to oversee records management matters in each section/unit;
  - ❖ designate a responsible staff to control the creation, naming and coding of new files to facilitate accurate capturing and ready retrieval of records; and
  - ❖ reflect in the job descriptions of the staff concerned their assigned specific records management roles and responsibilities for accountability and to facilitate evaluation.





## **A SAMPLE OF A RECORDS MANAGEMENT POLICY**



# RECORDKEEPING SYSTEMS


- A recordkeeping system is the tool to manage records.
- It is a manual or automated information system having the necessary functionality that enables it to carry out and support the various records management processes such as collection, organization and classification of records to facilitate their retrieval, distribution, use, disposal or preservation.
- When designing and implementing a recordkeeping system, an organization should ensure that it can meet the organization's records management policy, requirements, practices, guidelines and procedures.

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- ▶ To serve its purpose, a recordkeeping system should have the following characteristics:
    - ▶ **Reliability:** It should be capable of continuous and regular operation in accordance with established guidelines and procedures;
    - ▶ **Integrity:** Access and security measures should be in place to prevent unauthorized access, destruction, alteration or removal of records;
    - ▶ **Compliance:** It should be managed to comply with all requirements arising from the legal and regulatory environment and business, and expectations in which the organization operates;

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- ▶ **Comprehensiveness:** It should be able to manage records in any formats captured from different activities and transactions of the organization; and
  - ▶ **Systematic:** It should be able to capture, maintain and manage records systematically.
  - ▶ In light of the increasing use of electronic exchanges for official transactions, an organization may pursue the development of an electronic recordkeeping system (ERKS) to assist it in managing both non-electronic and electronic records in an integrated and consistent manner.

# RECORDS MANAGEMENT PROCESSES AND CONTROLS

- ▶ The purpose of a recordkeeping system is to manage records throughout their life cycle, i.e. from the creation or receipt of a record, through its useful life to its final disposal.
- ▶ The records management processes in different stages of records life cycle include:
  - ▶ records capture;
  - ▶ access;
  - ▶ registration;
  - ▶ tracking; and
  - ▶ records classification;
  - ▶ records disposal.
  - ▶ records storage;




Although the processes described above are presented as if in a sequence, it should be noted that in some recordkeeping systems, particularly electronic recordkeeping systems, some of them may take place simultaneously (e.g. records capture, registration and classification are often carried out as an integrated series of actions) or in a different order (e.g. access control and tracking should be implemented for records during their whole life) from that described.

Before examining the requirements of each records management process, an organization should first determine documents to be captured as records into a recordkeeping system and how long to retain records.

# DETERMINING DOCUMENTS TO BE CAPTURED AS RECORDS AND HOW LONG THEY SHOULD BE RETAINED

- ▶ An organization should determine which documents created or received during business processes should be captured as records into a recordkeeping system, and how long they should be maintained within the system, based on an analysis of the legal and regulatory environment, business and accountability requirements and the risk of not capturing or retaining the records.
- ▶ This will ensure adequate and necessary records are captured to meet business needs.
- ▶ This process is also important since proper disposal of records facilitates easy retrieval of records in active use, and minimizes costs for maintaining and storing records.





An organization should establish records retention and disposal schedules for its records to ensure systematic planning and orderly implementation of records disposal after records have been kept the right length of time.

An organization should also review approved records retention and disposal schedules regularly, say at least once every five years, to see whether amendments are required in light of changing circumstances.


Records retention and disposal schedules are established and reviewed having regard to the values of the records, as follows:

- ✓ Administrative value
- ✓ Operational value
- ✓ Legal value
- ✓ Fiscal value
- ✓ Archival value etc.



## Example

- ▶ A typical records retention and disposal schedule will contain the following details:
  - ▶ **Series of records:** The group/series of records covered (e.g. records relating to license applications) by the schedule;
  - ▶ **Inactive record criterion:** An indicator to demarcate active and inactive stages of records so as to start the counting of retention period (e.g. after action completed or after file closed);
  - ▶ **Retention period:** The period the records are to be kept after active use (i.e. meeting the defined inactive record criterion) but before their final disposal;
  - ▶ **Custody venue:** The place where inactive records are kept during the retention period (e.g. 2 years on-site and 3 years off-site storage); and

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- ▶ **Disposal action:** The final disposition of records (e.g. destruction, transfer to the organization's archives or the Public Records Office (PRO) of the Government Records Service (GRS) for permanent retention as archival records, migrating records to other storage formats etc.).
  - ▶ Establishment of records retention and disposal schedules can also facilitate identification of records with archival value. If any records having potential archival value are identified, an organization may contact PRO of GRS for assistance.
  - ▶ Records appraised as having archival value should be permanently preserved in a secure and controlled environment.




# RECORDS CAPTURE

- ▶ All records, regardless of format and technological environment in which they are collected, created or generated, should be captured into and maintained in an identifiable and proper recordkeeping system.
- ▶ The purpose of capturing a record into a recordkeeping system is to establish a relationship between the record, the creator and the business context that originated it, and to link it to other records.
- ▶ The captured records should be complete, and contain the content, structure and contextual information which are necessary to document an official activity or transaction as evidence of business.
- ▶ It should be possible to understand a record in the context of the organizational process that produced it and of other linked records.
- ▶ An organization may draw up guidelines for its staff on records capture.





# REGISTRATION

- ▶ A record is registered when it is captured into the recordkeeping system, providing evidence that it has been created or captured.
  - ▶ In a paper-based system, a record captured into a file is registered through entering such contextual information as the type of record (e.g. memo), date of record, and name of originator/addressee(s) of the record on the file.
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# RECORDS CLASSIFICATION

- ▶ To facilitate a wide range of records management activities, including identification, capturing and retrieval of records, security and access control as well as disposal, records should be systematically organized according to records classification schemes (also called file plans), which are plans for logical arrangement of records.
- ▶ This is according to one or more of the following: business functions, activities and contents of the records.
- ▶ In general, a records classification scheme includes a coding system expressed in symbols (e.g. alphabetical, numerical or alpha-numerical) to show the logical relationship amongst the records.

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- ▶ A records classification scheme should allow modifications such as addition of new records series/groups to cater for changing circumstances.
  - ▶ In view of their important role in records management, records classification schemes should be approved and reviewed by a senior staff in the organization having regard to the following principles:
    - ❑ whether business records are separated from administrative records;
    - ❑ whether the scheme is systematic, logical, consistent and scalable to facilitate accurate and complete documentation of policies, procedures and decisions for the efficient carrying out of the organization's functions, activities and transactions;

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- ❑ whether the scheme can be used easily and the file titles are clear and unique (e.g. avoid the use of “general”/“miscellaneous”) to facilitate accurate capturing and ready retrieval of records; and
  - ❑ whether the scheme facilitates segregation of vital records for protection and establishment of records retention and disposal schedules to satisfy retention requirements stipulated by legislation and to separate records which need to be kept for a long period (e.g. those on policy) from those which need to be kept briefly (e.g. routine correspondence).






# RECORDS STORAGE

- ▶ Records should be stored in such a manner so as to facilitate user access and ensure that they are protected from unauthorized access, use, disclosure, removal, deterioration, loss or destruction.
- ▶ An organization should lay down guidelines on the storage of records including sensitive or classified records.
- ▶ For records in paper form, organizations should note that paper deteriorates rapidly in an environment of high temperature and humidity.
- ▶ Furthermore, mould growth on paper can be a health hazard to staff.




## **Good Practices**


- Paper records should be stored in a clean and dry environment (e.g. not near unblocked window, under/near water/sewage pipe, water drain, manhole, water permeable wall or ceiling, water tank), and in proper facilities (e.g. filing cabinets and filing racks) instead of stacking them on the floor.
- An organization should also arrange inspection regularly and after events such as typhoon or rainstorm.
- For paper records which have long-term (e.g. 30 years or over) value, they are recommended to be stored in a clean environment with round-the-clock control of temperature and relative humidity (RH) at 20°C +/- 2°C and RH 50% +/- 5% respectively to ensure their preservation over time.



For storage of electronic records, the selection of storage media (e.g. optical disc and tape), storage system, storage environment and handling procedures should be based on records management and business considerations, e.g. volume and growth rate of records, records security needs, retrieval requirements and preservation needs.

In line with the international records management best practices, organizations should consider the following measures regarding storage of electronic records in an ERKS:

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- ❑ the hardware and software of the ERKS should be installed at a proper location, e.g. server room meeting industry standards and other related requirements;
  - ❑ digital media, e.g. optical disk and tape storing electronic records should be accommodated in a safe environment with suitable climate control under regular monitoring;
  - ❑ a programme should be set up to monitor and refresh the digital media regularly, e.g. transferring the records to a new optical disc, having regard to the life span of the media to ensure the accessibility and usability of records over time;

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- ❑ a programme should be set up to back up records and the associated metadata and for their preservation and access over time;
  - ❑ the storage requirements and arrangements should be regularly reviewed to meet records management and business needs; and
  - ❑ proper documentation should be maintained audit trails regularly to prevent their loss or damage;
  - ❑ migration of records, the associated metadata and audit trails should be conducted through successive hardware/software upgrades to retain the content, context and structure of records on the storage arrangements.


For storage of records in other formats (e.g. audio-visual materials, microfilms), an organization should seek specialist advice to ensure their preservation is commensurate with business needs.

# ACCESS

- ▶ An organization should ensure that timely access to records is provided to authorized users for conducting business. On the other hand, to provide sensitive information with adequate protection, records should be classified according to their level of sensitivity at a particular time.
- ▶ An organization should also lay down guidelines on the protection, processing and transmission of classified records.

## **Good practices**

- ❖ Records should be kept in a recordkeeping system with systematic indexes and classification to facilitate their easy retrieval.
- ❖ Access to personal data: An organization should refer to the Personal Data (Privacy) Protection Act for arranging access to personal or private data held by them.

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- ❖ Public access to information held by public bodies: The Code on Access to Information provides public access to government information kept by the Government ministries.
  - ❖ The Government has been encouraging public bodies under the jurisdiction of the Ombudsman to adopt the Code or a similar guide.
  - Public access to archival records is managed through the Public Archives and Documentation Service Act Cap 19 of the Laws of Kenya (1965).



# TRACKING


- In a recordkeeping system, tracking of the movement and use of records is required to:
  - identify outstanding action required;
  - enable retrieval of records;
  - prevent loss or missing of records;
  - monitor usage for recordkeeping system maintenance and security (e.g. growth of records, disposal of records); and
  - identify the operational origin of individual records where the recordkeeping systems have been amalgamated or migrated.
- An organization should decide the type of information that needs to be maintained to facilitate tracking of records, and to adopt means to track the whereabouts and movement of records.





## Good practices

- ▶ To support tracking of records in a paper-based recordkeeping system, an organization should;
  - ❑ prepare and maintain an accurate inventory of records which covers such information as file title, file reference number, date opened, date closed and storage location (e.g. room/floor); and
  - ❑ track the whereabouts and movement of records by adopting file movement card/register or appropriate electronic means (e.g. a bar-coding system).
- ▶ To minimize the risk of losing records during bulk relocation of files, it is necessary for an organization to make appropriate arrangements to ensure that the relocation process is properly supervised and conducted.




It is recommended that during such arrangements the following should be observed:

- ❖ an officer of a higher rank should oversee the task;
- ❖ taking stock before the relocation exercise;
- ❖ conducting a file inventory check after relocation;
- ❖ documenting the inventory check; and
- ❖ updating the new storage location immediately afterwards.


# IMPLEMENTING DISPOSAL (REGULAR DISPOSAL) OF RECORDS

- Approved records retention and disposal schedules will not serve their intended purposes if they are not followed.
- An organization should initiate regular disposal of records in accordance with approved records retention and disposal schedules.
- To safeguard against premature disposal of records and destruction of records having archival value, disposal of records should be properly authorized in advance by a sufficiently senior staff in the organization.

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- ▶ Specifically, the responsible staff of the organization should ensure that:
    - ❑ the retention and disposal requirements specified in the respective disposal schedules, and any governing legislation have been complied with; and
    - ❑ there is no outstanding actions on any of the records.

### **Good practices**

- ▶ Care should be taken to minimize the risk of inadvertent, unauthorized destruction of records during the disposal process.

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- The disposal process should be properly supervised by adopting the following procedures:
    - ❖ prepare an accurate list of records to be disposed of. Records (including those stored off-site) to be disposed of should be physically checked against the list to ensure its accuracy;
    - ❖ ensure the completeness (e.g. no enclosures or files are missing) of records having archival value;
    - ❖ segregate records approved for destruction to ensure that they do not mix up with those pending approval;
    - ❖  destroy classified records and records containing sensitive information (e.g. personal data) in accordance with the relevant requirements e.g. shredding the records to the required size to prevent reconstruction; and
    - ❖  document the procedures for accountability.

# TRANSFER OF RECORDS TO OTHER BODIES

- ▶ An organization may need to consider arrangements for transferring its records to other bodies due to such reasons as reorganization or outsourcing.
- ▶ The organization should prepare a list of records pending transfer for internal approval and document the transfer arrangements.

# DOCUMENTING RECORDS MANAGEMENT PROCESSES

- Documentation describing records management processes and recordkeeping systems should address legal, regulatory, operational and technical requirements. It is important that authority for records management processes, such as classification and disposal of records should be clearly stated.

## Good practices


- An organization should document the following records management functions and processes:
  - ❑ guidelines on what records should be created and kept;
  - ❑ records security policy, including security classification, access rights and security breach management;
  - ❑ approval for adoption of new records classification schemes;
  - ❑ endorsement on establishing records retention and disposal schedules;
  - ❑ endorsement on disposal of records and records disposal procedures.

# PROTECTING VITAL RECORDS

## What Are Vital Records?

- ▶ Vital records are those records containing information essential to the continued and effective operation of an organization in the event of an emergency or a disaster e.g. a prolonged electricity blackout, a serious flood, a blaze and an earthquake.
- ▶ Although an organization may take precautionary measures to protect records from perils in their day-to-day operations, even foolproof measures may not prevent damage to or loss of records when an emergency or a disaster strikes.
- ▶ Therefore, vital records protection should be put in place to reduce the risks of loss of records and to mitigate the possible adverse effects on the operation of organizations during and immediately after an emergency or a disaster.
- ▶ Vital records are specific to each organization having regard to its unique functions and responsibilities.




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- ▶ In general, vital records are required to:
    - deal with emergencies and disasters e.g. building plans and rescue plans;
    - continue and/or resume business operation during and/or after emergencies and disasters e.g. operational manuals of mission-critical information systems;
    - protect and/or re-establish legal, financial and functional status e.g. property and revenue records; and
    - preserve the rights of the organization, its employees and clients as well as members of the public e.g. payroll and medical records.
  - ▶ It is the responsibility of an organization to identify and protect (e.g. through duplication and/or off-site storage) its vital records to ensure uninterrupted operation of major business functions. If appropriate, a comprehensive vital records protection programme should be established.

# MONITORING AND AUDITING

- ▶ An organization should undertake compliance monitoring regularly to ensure that the records management processes and controls are being implemented according to the organizational policies and requirements. This is to ensure that its records management programme is functioning effectively.

## **Good practices**

- ▶ An organization should conduct regular review of its records management programme and practices to:
  - assess its compliance with key records management functions and requirements; and

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- ❑ identify areas requiring improvement with regard to desirable best practices and formulation of plans to implement improvement measures.
  - The review and recommended improvements should be endorsed by the management.
  - An organization should also consider the arrangements to deal with cases involving loss or unauthorized destruction of records.
  - It should properly follow up any loss or unauthorized destruction of records; including ascertaining the facts and identifying the circumstances leading to the loss or unauthorized destruction, taking steps to prevent recurrence and taking disciplinary action or administrative action as appropriate.