

# ERM compliance review methodology

by Richard Blake

## 1 Introduction

**1.1** The United Kingdom has in January 2005 implemented a freedom of information regime, which gives individuals new rights to access publicly held information. This regime together with the related data protection legislation and the Environmental Implementation Regulations has transformed the information landscape and also requires the maintenance of a pro-active record management regime by all public authorities. This in turn is raising awareness generally about the need for good information governance.

**1.2** Information governance is seen as the preferred information management regime, which allows organisations and individuals to exchange and utilise information securely, efficiently and effectively in order to provide the best possible services. Ideally it provides a framework to bring together all of the requirements, standards and best practice that apply to the handling of information.

**1.3** Good governance and due diligence are recognised concepts but the application of these principles to develop information governance regimes is new and still not widely understood by organisations and the public generally. Yet there is an awareness that data stored in information systems, including in manual systems represents an extremely valuable asset. The increasing need to transmit this information across networks of computers and the requirement to share information more widely, means it is far more vulnerable to accidental or deliberate disclosure, modification or loss than information held on traditional physical media and there is still a wide spread distrust of electronic information as the traditional concepts of the original record have to be reinterpreted afresh.

**1.4** Information Governance is in practice a response to that concern and also to the impact of UK government information policy, which is adding additional layers of complexity by imposing a number of additional legislative and regulatory requirements. It combines information security, corporate governance and business continuity, into a single unified management activity. This is not simply a matter of good corporate housekeeping - good information governance can undoubtedly lead to efficiency gains and make for more effective management.

**1.5** A holistic approach to information and records management offers many advantages to public sector organisations. It facilitates greater management effectiveness, visibility and control, because it identifies correspondences and removes overlaps, while taking into account requirements across the whole enterprise. It also helps to build trust into an organisation's information system. Whereas conventional security practices often require organisations to conceal their security capabilities, Information Governance provides External Demonstrability: the necessary information and validation mechanisms to encourage external confidence and trust.

**1.6** The permissive information disclosure regime enforced by the Freedom of Information Act 2000 within the United Kingdom is also prescriptive in that it imposes new duties of care, which can only be discharged via a strong information governance regime. In particular section 46 of the Freedom of Information Act 2000 provides for the establishment of a code of practice (hereafter called the Records Management Code) providing guidance to relevant authorities as to the practice,

which would be desirable for them to follow in connection with the keeping, management and destruction of their records. The first edition of this code was published in 2002. As implementation of the Freedom of Information Act 2000 was deferred until January 2005 the Records Management Code was not generally applicable but issuing it early enabled authorities to see what was expected of them and gave them an opportunity to develop their records management systems accordingly.

**1.7** This paper explores the nature of the Records Management Code and the response by the National Archives for England, Wales and the United Kingdom to develop a methodology in the form of a compliance workbook to support both self assessment, and where required, external assessment, of the performance of public authorities against this Code. It is intended to support the need for evidence and rules based assessments in order to enable effective information governance across the wider public sector within England and Wales.

## **2 Development of a compliance methodology**

**2.1** The Information Commissioner is charged with the oversight and regulation of requests for information within the United Kingdom under the Freedom of Information Act 2000. If it appears to the Commissioner that the practice of a public authority in relation to the exercise of its functions under this Act does not conform to that proposed in the Records Management Code, he may give to the authority a practice recommendation specifying the steps, which ought in his opinion to be taken for promoting such conformity. Failure to comply with a practice recommendation can lead in certain circumstances to the issue of an enforcement notice and if this is ignored could lead to a formal prosecution in a court of law involving both the relevant public authority and possibly named individual officers.

**2.2** The Commissioner is required however to consult the Keeper of Public Records who is the chief executive of the National Archives (TNA) before giving a public authority a practice recommendation which relates to conformity with the Records Management Code. To support this relationship the Information Commissioner and the Keeper of the Public Records have signed a Memorandum of Understanding (MoU) setting out how they will work together on promoting and monitoring the records management code of practice. This is also supported by a formal service level agreement (SLA), which sets out in more detail the support provided to the Information Commissioner by The National Archives.

**2.3** Key to both the MoU and the SLA is the provision for the Information Commissioner and the Keeper to agree a programme of audits that the Keeper will undertake on behalf of the Commissioner to assess conformity with the records management code.

**2.4** To support these audits or assessments of conformance the National Archives (TNA) agreed to develop a draft methodology to enable both self-assessment by public authorities and provide a tool to inform external auditors who may be required to undertake assessments of compliance against the Records Management Code. The methodology was developed in early 2005 and has been provided to the Commissioner for his consideration and review.

**2.5** The Methodology, which has been provided in the form of a compliance workbook, is based both on the areas highlighted for action in the Records Management Code and existing best practice guidance developed by the National Archives (TNA) which is relevant to those areas. It attempts to identify both

quantitative and qualitative indicators of compliance using evidence-based assessment. It is intended to provide the means to identify areas of concern or risk, which in turn will enable public authorities to assess the risk of non-compliance, undertake remedial action and develop appropriate contingency planning.

### 3 Basis for scrutiny

3.1 The Records Management Code identified 7 key areas for attention. These are:

- Records management function
- Record Management policy statement
- Roles and responsibilities
- Training and awareness
- Records creation and record keeping
- Records maintenance
- Records disposal

The Records Management Code is published on the website of the Department for Constitutional Affairs (DCA) and can be accessed at:

<http://www.dca.gov.uk/foi/codemanrec.htm>

3.2 The compliance workbook which has been developed in response to this agenda by the National Archives (TNA) focuses on the areas listed in the records management code for action but for ease of use has subdivided records creation and record keeping to separate the specific issue of *Access* but consolidated *Roles and responsibilities* with *Training and awareness*. It also contains a section on *Performance measurement*. The workbook provides a total of 8 modules in the form of questionnaires which overall contain 180 questions.

3.3 For each module there is an introductory statement on its purpose, contextual information, references to relevant guidance and, finally, the relevant questionnaire. The workbook questions within each of these modules are critical as these need to be addressed in order for users to assess the degree to which their organisation complies with the relevant key area described in the Records Management Code.

3.4 The intention behind the workbook is that by completing the questionnaires it will be possible to establish the degree to which an organisation complies with the Record Management Code. It also provides a mechanism to evaluate the level of risk to the organisation caused by records management services that do not conform to the Records Management Code and encourage the development of appropriate mitigation strategies. By undertaking a regular series of assessments it is hoped that each organisation, which uses the workbook, will also develop an historical audit record of their compliance against the Code. This for example has the potential to be a very effective tool to support public authorities within local government when they are required to undertake comprehensive performance assessments (CPA).

3.5 The current edition of the workbook has been published as a formal public consultation draft to encourage the widest possible feedback. . It is intended to produce and publish a revised edition this autumn to reflect public comment following the closure of the consultation period in August 2005.

## 4 Aims and benefits

4.1 The workbook is intended for the assessment of all public organisations irrespective of their size or complexity. However, it is recognised that the relevance of some elements will depend on the role, complexity and size of each public authority. Where non-compliance is identified it should be possible to determine the impact of the risk and the effectiveness of the contingency resource earmarked for mitigating or avoiding it.

4.2 The workbook is intended to support assessment of records systems holding records in all formats - both paper-based and digital form including those held in an electronic document and records management system (EDRMS). For the purpose of the workbook and this paper, a record is defined as a specific piece of information produced or received in the initiation, conduct or closure of an institutional or individual activity, and that provides sufficient content, context and structure to provide evidence of an activity. A managed record-keeping system exists where records can be organised and indexed, for management and retrieval in logical groups which reflect the context of creation and use – records should be scheduled and management processes be capable of audit.

4.3 Using the compliance methodology contained in the workbook it is hoped this will inform senior management thinking and decisions to underpin and facilitate the following key aims and benefits:

- efficient joint working and information exchange
- evidence-based policy making by providing reliable and authentic information for the evaluation of past actions and decisions
- administration of data protection principles and effective implementation of freedom of information and other information policy legislation, through good organisation of records
- accountability by providing reliable records of actions and decisions
- knowledge management across sectors of government by making reliable information available for sharing, extraction and summarisation
- various specific legislation or regulations which give rise to a requirement to demonstrate the authenticity of records to facilitate evidential weight for legal admissibility purposes.

4.4 It is expected that external auditors undertaking assessments of performance will use this workbook to determine the effectiveness of an authority's record management policies and procedures. To this end it is envisaged that users of the workbook in combination with existing performance evaluation tools will be able to undertake a holistic view of the information processes occurring within their organisation, determine the degree to which their records are adequately managed and clarify the nature of required improvements to secure an appropriate level of compliance.

## 5 Structure of the compliance workbook

5.1 The workbook focuses on the areas listed in the records management code for action. It contains 8 specific modules each of which contains a specific questionnaire. These are:

- Records management function

- Record Management policy statement
- Roles and responsibilities
- Training and awareness
- Records creation and record keeping
- Records maintenance
- Records disposal
- Access (part of Records creation and record keeping which it has been more convenient to handle separately)

It also contains a module on

- Performance measurement

**5.2** The aim of this workbook is not merely to achieve a complete series of Yes responses as in certain circumstances that may not be relevant or applicable. However where the answer is a negative response (No), it is recommended that following completion of the module a risk assessment be undertaken to assess the level of risk and develop appropriate mitigation strategies.

**5.3** Each question provides for four potential responses. These are:

- Positive (Yes) responses
- Negative (No) responses
- Non-applicable (N/A) responses
- Partial compliance responses where a positive response (Yes?) is appropriate for part of the organisation

**5.4** . Below each question a Reference field has been provided to either insert an explanatory statement or a cross-reference to a relevant document or policy statement, which can be examined by an independent assessor for compliance. A worked example is provided below for information

1	Is the records management function formally recognised within the organisation as a specific corporate programme?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
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**Reference** This function was submitted to the Management Board on 20/07/2004 for formal endorsement ref MB paper 37/2004 and is detailed in the accompanying records management policy ref MP 101/2004

**5.5** The comment inserted in the Reference field permits an independent assessor to cross check the validity of the asserted answer.

**5.6** Where a negative response is given it should be possible to provide some supporting comment to clarify the situation, which may assist in mitigating the risk.

**5.7** Where a non-applicable response is given this may of itself be sufficient but again wherever possible an additional comment is encouraged to explain why this question is not relevant in the context pf other organisation’s record management.

**5.8** In many instances it may not be appropriate to give a complete Yes or No response as compliance is incomplete and varies across the organisation. In such cases a qualified “Yes?” comment should be provided. Realistically partial compliance will be the most appropriate response to many of the questions contained

in the workbook but in such cases the explanatory comment needs to highlight the degree to which the organisation complies and where possible the timescale for addressing the remainder or alternatively detailing the other measures or circumstances which mean extending compliance further is not appropriate to the organisation. This information needs to be sufficient to enable an assessor to validate the statement.

**5.9** Once the questionnaire is complete an assessment can be undertaken to confirm the validity of the accompanying reference comments - the cited policies and procedural documents plus supporting performance measures etc. Where partial or non-compliance is identified a full risk assessment should be undertaken to confirm the criticality of the risk, the relevance of any proposed mitigation strategy and to clarify the timeline for undertaking the required remedial work. The outcome of this work should be validated and approved by a senior management board or committee.

## **6 Definition and purpose of the modules**

**6.1** Each module provides contextual information and links to appropriate standards, codes of practice and other relevant guidance to assist users who are unfamiliar with the specific subject area identified in the Records Management Code.

### **Records management function**

**6.2** This module deals with the need to establish records management as a strategic corporate function within an organisation and to ensure it receives the necessary levels of organisational support. It also identifies the need to have organisational links or close liaison between records management and management of freedom of information, data protection and other information management functions. The relevant questionnaire contains 8 questions.

**6.3** The Records Management Code states that:

*“The records management function should be recognised as a specific corporate programme within an authority and should receive the necessary levels of organisational support to ensure effectiveness. It should bring together responsibilities for records in all formats, including electronic records, throughout their life cycle, from planning and creation through to ultimate disposal. It should have clearly defined responsibilities and objectives, and the resources to achieve them. It is desirable that the person, or persons, responsible for the records management function should also have either direct responsibility or an organisational connection with the person or persons responsible for freedom of information, data protection and other information management issues.”*

This text recognises that records and information are an asset that requires management on the same level as human resources, finances and property.

**6.4** The questionnaire, which follows, is the shortest in the workbook and consists of seven questions which endeavour to elicit if the function has been truly recognised and resourced within the institution.

**6.5** Evaluation of this module should enable the following activities:

- Review of the structure of the organisation to see what changes might be required to achieve this objective.

- Ensure that all information functions are part of the same command or, alternatively, working arrangements for close liaison have been established.
- Ensure that adequate resources to support the records management function are in place, working with those responsible for determining the level of resources and those responsible for assigning such resources

## Record Management policy statement

6.6 This module deals with the need to establish a records management policy supported and mandated by senior management across the whole organisation and provides the module to undertake such an assessment. The policy should be comprehensive and cover all activities falling within the records management function. There should be a mechanism for regular review of the policy's relevance. The relevant questionnaire contains 44 questions.

6.7 The Records Management Code states that:

*“An authority should have in place an overall policy statement, endorsed by top management and made readily available to staff at all levels of the organisation, on how it manages its records, including electronic records.*

*This policy statement should provide a mandate for the performance of all records and information management functions. In particular, it should set out an authority's commitment to create, keep and manage records which document its principal activities. The policy should also outline the role of records management and its relationship to the authority's overall strategy; define roles and responsibilities including the responsibility of individuals to document their actions and decisions in the authority's records, and to dispose of records; provide a framework for supporting standards, procedures and guidelines; and indicate the way in which compliance with the policy and its supporting standards, procedures and guidelines will be monitored.*

*The policy statement should be reviewed at regular intervals (at least once every three years) and, if appropriate, amended to maintain its relevance”*

6.8 The Records Management Code extends these principles to the management of electronic or digital records. Specifically it states that:

*“The principal issues for the management of electronic records are the same as those for the management of any record. They include, for example the creation of authentic records, the tracking of records and disposal arrangements. However, the means by which these issues are addressed in the electronic environment will be different.*

*Effective electronic record keeping requires:*

- *a clear understanding of the nature of electronic records;*
- *the creation of records and metadata necessary to document business processes: this should be part of the systems which hold the records;*
- *the maintenance of a structure of folders to reflect logical groupings of records;*
- *the secure maintenance of the integrity of electronic records;*
- *the accessibility and use of electronic records for as long as required (which may include their migration across systems);*

- *the application of appropriate disposal procedures, including procedures for archiving; and*
- *the ability to cross reference electronic records to their paper counterparts in a mixed environment.”*

**6.9** An agreed records management policy statement will provide a mandate for the performance of all records and information management functions and the final records management policy statement having secured its approval by senior management should be made available to all staff. The workbook questionnaire probes to ascertain whether the areas which should be addressed by such a policy have been incorporated and it also seeks for additional evidence that the policy is formally adopted, promulgated and resourced including the provision of a mechanism for its periodic review.

## **Roles and responsibilities & Training and awareness**

6.10 This module deals with the issue of the human resources required to undertake records management. It covers definition of roles, allocation of resources to undertake the roles, appointment of skilled records management staff and establishment of training programmes for their professional development, and making staff across the organisation aware of their contribution to effective corporate records management and giving them the training they need to follow records management procedures and guidance .The relevant questionnaire contains 29 questions to be addressed..

**6.11** The Records Management Code states that:

*“A designated member of staff of appropriate seniority should have lead responsibility for records management within the authority. This lead role should be formally acknowledged and made known throughout the authority.*

*Staff responsible for records management should have the appropriate skills and knowledge needed to achieve the aims of the records management programme. Responsibility for all aspects of record keeping should be specifically defined and incorporated in the role descriptions or similar documents.*

*Human resource policies and practices in organisations should address the need to recruit and retain good quality staff and should accordingly support the records management function in the following areas:*

- *the provision of appropriate resources to enable the records management function to be maintained across all of its activities;*
- *the establishment and maintenance of a scheme, such as a competency framework, to identify the knowledge, skills and corporate competencies required in records and information management;*
- *the regular review of selection criteria for posts with records management duties to ensure currency and compliance with best practice;*
- *the regular analysis of training needs;*
- *the establishment of a professional development programme for staff with records management duties;*
- *the inclusion in induction training programmes for all new staff of an awareness of records issues and practices”.*

**6.12** Records management responsibilities must be clearly defined and assigned, and made known throughout the organisation and the records management programme has to be staffed by skilled people and. This last point is especially important as access to skilled people is critical to the success of a records management programme.

**6.13** Organisations should be able to access records management skills internally through recruitment, training and development or, if not, externally through appropriately qualified consultants. In a medium to large organisation, this will require skilled records management position/s, in a smaller organisation, this may be a role with other responsibilities. The role should also have a clear connection with related activities and obligations in respect of freedom of information and data protection compliance.

**6.14** Training in records management policies and procedures takes place at two levels:

- professional development for records management staff
- awareness of records issues and practices by all members of staff

**6.15** The skills required will vary according to the nature and complexity of the affected public office. Skill levels should be appropriate to the complexity of the records management tasks for which the designated staff are responsible. However staff undertaking records management should all possess appropriate skills for their positions and responsibilities and these should be kept up to date.

**6.16** All organisations will need to develop a programme of professional training for records staff. This will involve the Records Manager working with training and development staff. The programme should seek to identify specific records management training needs in the light of the organisation's competency framework and arrange for those needs to be met, using internal and external training as appropriate.

**6.17** The relevant workbook questionnaire seeks for evidence that both the identification and establishment of appropriate roles has been undertaken and that such roles are underpinned by an effective training and competency regime.

## **Records creation and record keeping**

**6.18** 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. Note that access matters relating to the creation of records are dealt with in the seventh module on Access. The relevant questionnaire contains 23 questions.

**6.19** 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.*

**6.20** 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. The workbook questionnaire is aimed to elicit suitable evidence to determine if an organisation has an effective and pro-active records management regime.

## **Records maintenance**

**6.21** This module deals with the need to establish a records maintenance regime which will sustain or preserve records, along with the means to identify and retrieve them easily, for as long as they are required. The objective should be to maintain authentic, reliable and usable records, as defined in the previous chapter, that conform to BS ISO 15489 requirement for the maintenance of record integrity. The relevant questionnaire contains 23 questions to be addressed.

**6.22** Section 8.7 of the Records Management Code describes the key criteria required to establish an appropriate maintenance regime. It states that:

*“The movement and location of records should be controlled to ensure that a record can be easily retrieved at any time, that any outstanding issues can be dealt with, and that there is an auditable trail of record transactions.*

*Storage accommodation for current records should be clean and tidy, and it should prevent damage to the records. Equipment used for current records should provide storage which is safe from unauthorised access and which meets fire regulations, but which allows maximum accessibility to the information commensurate with its frequency of use. When records are no longer required for the conduct of current business, their placement in a designated records centre rather than in offices may be a more economical and efficient way to store them. Procedures for handling records should take full account of the need to preserve important information.*

*A contingency or business recovery plan should be in place to provide protection for records which are vital to the continued functioning of the authority”.*

**6.23** Efficient maintenance of records will ensure that they receive adequate protection from fire, flood, theft, and other forms of catastrophic loss so the records irrespective of format are neither lost, corrupted or subjected to unauthorised alteration and can easily be located and retrieved when required. This addresses the need for physical security but electronic or digital records also require logical security

if they are to continue to be accepted as authentic records. The workbook also examines whether an organisations has put in place an effective regime to protect electronic information over time to support attestations of authenticity.

## Records disposal

**6.24** This module deals with the records disposal regime. It is particularly important under FOI that there are clearly defined policies and procedures for identifying how long records should be kept, for disposing of those no longer required for business purposes, (either by destruction or transfer to an archive) and for documenting the decisions and their implementation. This will provide evidence that records have not been destroyed in order to evade providing information in response to a request for information. Authorities must therefore have in place clearly defined arrangements for the appraisal and selection of records, and for documenting such work. The relevant questionnaire contains 17 questions to be addressed.

**6.25** Section 9 of the Records Management Code lists the key elements and activities needed to establish the required processes, and mechanisms for a effective disposal arrangements. It states that:

*“It is particularly important under FOI that the disposal of records - which is here defined as the point in their lifecycle when they are either transferred to an archives or destroyed - is undertaken in accordance with clearly established policies which have been formally adopted by authorities and which are enforced by properly authorised staff.”*

**6.26** Each public authority has to establish a system for documenting appraisal decisions. This should include information on records selected for permanent preservation, destroyed or retained by the authority. Disposal schedules may form part of this documentation. Disposal schedules are timetables that set out when individual/groups of records are due for review, transfer to an archives and/or destruction. They make it easy to establish whether or not a record exists if a request is received and give the public confidence that a public authority has adequate procedures for identifying the appropriate disposal action for records, together with the appropriate time-scale for its implementation.

**6.27** The workbook questionnaire for this module probes to seek for evidence that an organisations has put in pace an appropriate disposal regime.

## Access

**6.28** This module deals with the need to establish an appropriate access regime to manage requests for information under the Freedom of Information Act 2000 effectively and to document the reasons why information cannot be disclosed and which exemptions have been invoked as part of that decision making process. In short public authorities must have in place clearly defined arrangements for documenting exemption and disclosure decisions. The relevant questionnaire contains 20 questions to be addressed.

**6.29** The Records Management Code 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.”*

**6.30** The Code then goes on to say that:

*“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.”*

**6.31** In order to ensure that access decisions are consistent and transparent public authorities have to establish systems for recording when information has been disclosed – whether through their publication schemes or in response to a request - and, if disclosure has been refused, the reasons for non-disclosure.

**6.32** The Freedom of Information Act 2000 sets out strict timetables for compliance with a request, ensures that the costs of retrieving information are reasonable and asserts that all recorded information held, wherever it is located within the public authority, is potentially disclosable. If poor records management results in any of these requirements not being met, it will constitute a breach of the Act and the Information Commissioner will be able to consider using his enforcement powers.

**6.33** The workbook questionnaire provides the means to validate if an organisation has established both an appropriate regime to manage requests to access information and a regime to document what has been done to ensure a consistent approach.

## **Performance measurement**

**6.34** Many of the questions in the earlier modules identified a number of measures for assessing the effectiveness of an authority's records management system. This module deals with the establishment of performance measures to ensure the records management system established by the authority is being used and managed effectively by the end users. The relevant questionnaire contains 15 questions to be addressed.

**6.35** The Records Management Code currently makes no explicit mention of performance measurement but it has been thought prudent to include this aspect as without it an attempt to establish an effective records and information management regime would be undermined. However the Records Management Code require the following:

*Any freedom of information legislation is only as good as the quality of the records to which it provides access. Such rights are of little use if reliable records are not created in the first place, if they cannot be found when needed or if the arrangements for their eventual archiving or destruction are inadequate. Consequently, all public authorities are strongly encouraged to pay heed to the guidance in the Code.....*

.....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.....

.....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.....

..... Audit trails should be provided for all electronic information and documents. They should be kept securely and should be available for inspection by authorised personnel. The BSI document *Principles of Good Practice for Information Management (PD0010)* recommends audits at predetermined intervals for particular aspects of electronic records management.

**6.36** Performance measurement is necessary to relate records activities to needs, to assess the efficiency or effectiveness of records activities, and to demonstrate value and accountability. In particular the need to ensure end users are capturing or filing relevant records, locating them within appropriate files or, in the case of electronic records, associating them with relevant folders in the business classification scheme is critical if the organisation is going to ensure that the record management system developed for the authority is actually working in accordance with the design criteria approved by senior management. A further critical consideration is that accurate retrieval has to be possible in response to searches undertaken in response to requests for information contained in the records. The measures specified in the table of questions within the workbook are intended to elicit key information against the performance measures and they should provide indicators of appropriate custom and practice. Organisations may also need to develop additional measures according to circumstance.

## **7 Reaction to the workbook and future development**

**7.1** The workbook with the approval of the Information Commissioner was published in the form of a public consultation draft in April this year. The consultation period closed on 31 August 2005 but the draft remains available for reference purposes on the National Archives website and can be accessed at:

<http://www.nationalarchives.gov.uk/news/stories/62.htm>

**7.2** The draft is to be reviewed and revised in the light of the feedback received. However feedback has been generally favourable and some public authorities have unilaterally used the draft workbook to assess themselves.

**7.3** Although the feedback has been positive two significant issues have been identified the first being the overall length of the workbook which amounts to 98 pages and the second concerns the advice provided on assessing completed questionnaires. In respect of the length of the current draft reviewers have expressed a desire to see the workbook divided into 8 smaller publications with each one focused on a specific module questionnaire. Reviewers have also asked for more assistance in developing an assessment model to enable them to ascertain the degree to which their organisations conform to the Records management Code as well as providing a gap analysis.

**7.4** We have accepted the need for these changes and we will edit the book into smaller units based on the eight modules. We had also recognised that more needed

to be done to assist users to review completed questionnaires and to provide some form of scoring mechanism. The current document provides advice on using risk assessment tools to evaluate identified areas of non compliance but the development of a scoring mechanism will it is hoped allow for a greater degree of rigour. There is a formal proposal for one of the UK's formal auditing bodies - the Audit Commission to use the outputs from completed workbook to inform the comprehensive performance assessment process (CPA) which is a key measure used within the United Kingdom to rate the performance of local authorities and it is hoped that the development of a scoring mechanism will facilitate the use of the workbook and its modules for this purpose.

**7.5** The National Archives will be working over the next few months to develop the proposed scoring model for all eight modules and we are planning to field test the revised workbook using both central government bodies and local government authorities to ensure it is entirely apposite for both types of organisations. A further development lies in the integration of the modules into the information governance toolkits which has been developed for the National Health Service and also the related Social Care Information Governance toolkit which is being developed for all public bodies involved in delivering social services within the United Kingdom.

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