**RECORDS MANAGEMENT COMPLIANCE AUDIT:
TRANCHE II - DEPARTMENTS OF CHAMBER & COMMITTEE SERVICES AND
INFORMATION SERVICES**

Paper from the Director General of Information Services

Purpose

1.   This paper is intended to update the Board on progress with the Records Management Compliance Audit, following the completion of the second tranche of the audit carried out in the Department of Chamber and Committee Services (DCCS) and the Department of Information Services (DIS) from 12 January to 20 March 2009, by the Records Management Team (RMT) of the Parliamentary Archives.

Conclusions and decisions

2.   The Board is invited to note:
   a.   the levels of compliance achieved by the two departments (paragraphs 6 and 7);
   b.   the recommendations made and the management responses given (see paragraphs 8 to 12 and **Annexes A** and **B**);
   c.   recurring findings of all audits to date (see paragraph 13).

Background

3.   In May 2008 the Management Board approved the carrying out of a records management compliance audit as a risk management control designed to examine and evaluate the degree to which compliance with the *Parliamentary Records Management Policy* (April 2006) is being met across the House of Commons. The aim is to provide assurance for the Board that departments and PICT can account for what records they hold, where they are located and what records have been disposed of, in line with policy, including the *Authorised Records Disposal Practice* (ARDP). This links in closely with work being undertaken in the areas of information risk and information security.

4.   The first tranche of the audit was carried out in the Departments of Facilities and Resources between October and December 2008. Key findings and recommendations were reported to the Management Board in February 2009. Since then findings have been fed into the SPIRE business case.

Statements of Compliance

5.   The Records Management Team considers that taking into account the length of time the records management programme has been in effect (since 2001) and the tools, training and support available to staff, it should be expected that all departments are in compliance with Records Management Compliance Level 3[1], while some departments comply partially with Level 4[2].

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[1] Level 3 establishes whether the department has implemented the basic features of the parliamentary records management programme as set out in the *Policy*, including the disposal of documents/records/data as per the ARDP.

[2] Level 4 establishes the degree to which records management procedures, including disposal, are embedded following implementation (I.e. the extent to which it has been integrated as 'business as usual' in departmental working practices), and whether the culture of record keeping amongst staff has improved.

6.   In the Team's opinion, **DCCS has broadly implemented the key features of the records management programme as set out by Level 3 in this audit. In some areas it has embedded good practice into day-to-day working and there are examples of individual office compliance at Level 4.** There is widespread awareness across the department of the importance of record-keeping and disposal both to support day-to-day business activities and to meet wider corporate and statutory requirements. The department has a culture of valuing information and staff are keen to interact with the records management programme and improve on current practices. However, levels of compliance vary across the department and there are some weaknesses in the implementation and enforcement of records management policy. It is particularly evident that departmental records held electronically are not subject to the same levels of control as their paper counterparts.

7.   In the Team's opinion, **DIS is complying fully to Level 3 and there is evidence suggesting compliance with a small number of elements at Level 4. The department has also demonstrated commitment to continuing improving its records management practices and striving for best practice in this area as evidenced by extensive programmes of work over the past two and a half years.** It should be noted that levels of compliance relating to the day-to-day creation and management of records are higher than those which focus on the disposal of materials, for which there is no compliance at Level 4.

Recommendations and Management Responses

8.   It must be recognised that the size, number of discrete offices and diverse range of services provided by both departments present a number of challenges to achieving unified, consistent, department-wide management of records. The report recommendations and management responses provide a realistic risk based response to the findings of the audits. Both departments have a culture of valuing information and between them hold key record series relating to the administration's core tasks of supporting the procedural business and scrutiny function of the House, and providing accurate and timely advice to Members in the course of their parliamentary work. However, individual records management responsibilities at both senior and junior levels are not consistently understood, with records management activities sometimes seen as additional tasks which are delegated to designated members of staff only. Records management throughout all sections of the departments is therefore not yet embedded or established at a consistent and sustainable level. It is worth noting that both departments were already working to resolve some issues identified during this audit and they are in a strong position to improve on current records management practices.

9.   For DCCS**,** three high priority issues with recommendations have been identified as a result of the review; these are listed in **Annex A**. A further six medium priority recommendations have also been made and are available upon request. The aim of these recommendations is to bring the whole department's compliance with records management policy and practice to Level 4, and to progress towards compliance with Level 5.

10.   The draft management response received from DCCS takes on board the risks raised and provides an ambitious response to the recommendations made. A 2 year programme of work will allow the department to achieve full compliance with Levels 3 and 4, and be moving towards compliance with Level 5. The Records Champion, with other relevant staff of the department and the RMT, is working to finalise and co-ordinate appropriate actions required to address the report's recommendations.

11.   For DIS, four high priority issues with recommendations have been identified as a result of the review; these are listed in **Annex B**. A further five medium priority issues with recommendations have also been made and are available upon request. The aim of these

recommendations is to move the whole department's towards full compliance with records management policy and practice to Level 4.

12.   The management response received from DIS takes on board the risks raised and provides a practical and sustainable response to the recommendations made. A 1.5 - 2 year programme of work will bring the whole department's compliance to Level 4. Staff in the department's Knowledge and Information Management (KIM) team, who are responsible for leading implementation of the recommendations, have met with the RMT to take further advice and guidance on implementing the recommendations and to develop an agreed action plan.

Emerging findings

13.   In addition to the policy related issues highlighted in the paper to the Management Board in February, the audits carried out to date have revealed a number of recurring issues. These include:

- Varied levels of awareness of individual records management responsibilities, and staff, including managers, are not always held to account for ensuring that records management policy is complied with, resulting in inconsistent implementation of the policy;
- Staff do not always recognise that they generate or hold records, and may be unaware that many of the documents they create or receive daily in the course of their work, including email correspondence and information held on databases or strategic systems, are records that must be managed in line with policy. This results in a lack of consistency in the effective day-to-day control of *all* records created and held by the administration;
- Poor management and lack of control of records held electronically on network and personal drives and in Outlook accounts;
- Inconsistent disposal of records as agreed and set out in the *Authorised Records Disposal Practice*. Although most staff are aware that there is a policy relating to the disposal of records, evidence shows that instructions are not consistently implemented, particularly in the area of electronic copies of records and emails.

14.   The audit has raised awareness of the records management programme across all offices and departments, and all management responses to date have shown a keen desire to ensure staff receive appropriate training so that records management requirements are understood and implemented. Extra training sessions have been added to the Parliamentary Archives summer training programme to meet increased demand, and online training modules are also available. This will go some way to mitigating a number of the issues highlighted above. The RMT is also working closely with central House of Commons and departmental HR staff to develop a sustainable "blended learning" strategy, including classroom based sessions, e-learning products, and inclusion in other initiatives such as *Managing for Excellence*, which will meet the needs of all staff and can be delivered within existing resources.

Audit – Next steps

15.   The Records Management Compliance Audit commenced in PICT on 20 April 2009. The final report on the audit will be submitted to the Management Board in July 2009.

John Pullinger
Director General of Information Services   April 2009

Annex A – Department of Chamber and Committee Services Draft Management Response

			HIGH PRIORITY RECOMMENDATIONS	
Ref.	**Issue**	**Risk**	**Recommendations**	**Management Response / Action Plan**
1	Many staff are unaware of the strategic importance of complying with records management policy for *all* records they create and receive on a day-to-day basis, and may be unaware of their individual responsibilities.	1-7	Require all relevant staff that produce, reference, maintain and destroy records to attend House-wide records management training over a period of time to be agreed with the Records Management Team (RMT). **NOTE**: *training should not be a one-off occurrence – staff should attend refresher training at regular intervals, and attendance should be monitored.*	**Agree** **Proposed Action:** All staff [who have not been on records management courses in the past 12 months] will be required to attend such courses in the next six months **Person responsible:** Clerk Assistant **Timescale for completion:** 1 October 2009
			Departmental / office induction processes to include introduction to local records management procedures, including for electronic records and e-mails, for all relevant staff.	**Agree** **Proposed Action:** Induction process in all offices to include this, reinforced by addition to checklist for new/moved staff; model practices in Vote Office to be followed **Person responsible:** Heads of Directorate **Timescale for completion:** 1 October 2009
			Embed records management procedures in relevant office procedures manuals and desk notes.	**Agree** **Proposed Action:** office manuals to be revised **Person responsible:** Clerk Assistant

				Timescale for completion: 1 October 2009
			Where appropriate, include references to specific records management responsibilities in forward job plans, and review these activities in annual staff reports.	**Agree** **Proposed Action:** Such responsibility to be included in FJPs for Heads of Office and others they designate; to be included in annual report briefing **Person responsible:** Heads of Office/Colin Lee **Timescale for completion:** 1 October 2009
2	Some staff are unaware of the policy of printing substantive electronic records, including email, to paper and filing them in accordance with records management procedures.	1, 2, 5	Office procedures to include reference to requirements to print electronic records to paper and file them in accordance with records management procedures.	**Agree –** Recognised as a requirement until electronic records management is available -- but likely to be difficult to impose on users **Proposed Action:** To be emphasised in all staff training sessions and office manuals (see item 1) **Person responsible:** Heads of Office **Timescale for completion:** 1 October 2009
			Put in place procedures to ensure regular spot-checks are carried out across all directorates to ascertain whether substantive hard copy records are filed in accordance with procedures and information recorded appropriately.	**Agree** **Proposed Action**: Regular annual reviews of office practices to be carried out on Vote Office model will include some spot-checks **Person responsible:** Heads of Office

				Timescale for completion: 1 January 2010
3	The Office of the Editorial Supervisor of the Vote to date has had no interaction with the records management programme.	1-7	Ensure staff are aware of the requirements outlined in the *Parliamentary Records Management Policy* and implement key features of the records management programme.	**Agree** **Proposed Action:** attendance of staff at records training sessions and revision of office manuals with advice from RMT **Person responsible:** Principal Clerk, Table Office **Timescale for completion:** 1 October 2009
4	Not all records are currently adequately covered by instructions in the Authorised Records Disposal Practice.	6-7	Clerk Assistant's Directorate to work with the RMT to identify appropriate retention periods and disposal instructions for these records.	**Agree** **Proposed Action:** Illustrative list of specific documents to be drawn up and retention/disposal rules attached to them **Person responsible:** RMT/Martyn Atkins **Timescale for completion:** 1 October 2009
4	(continued)		Committee Directorate to work with the RMT to identify records not adequately covered and assign appropriate retention periods and disposal instructions.	**Agree** **Proposed Action**: Illustrative list of specific documents to be drawn up and retention/disposal rules attached to them **Person responsible:** Clerk of Committees/RMT **Timescale for completion:** 1 October 2009

Annex B – Department of Information Services Management Response

	HIGH PRIORITY RECOMMENDATIONS			
Ref.	**Issue**	**Risk**	**Recommendations**	**Management Response / Action Plan**
1	Many staff are unaware of the strategic importance of complying with records management policy for *all* records they create and receive on a day-to-day basis, and may be unaware of their individual responsibilities in relation to the practical, day-to-day implementation of procedures.	1, 2, 4, 5, 6, 7	Require all relevant staff that produce, reference, maintain and destroy records to attend House-wide records management training over a period of time to be agreed with the Records Management Team. **NOTE:** *training should not be a one-off occurrence – staff should attend refresher training at regular intervals, and attendance should be monitored*	**Agree / Disagree** Agree **Proposed Action:** RMT to initiate (i.e. through bi-annual training programme); specified training to be compulsory for RM Champions; DIS KIM Team/Learning & Development Team to continue to advertise training in departmental *Weekly Information Sheet*; training attendance log to continue to be held by RMT **Person responsible:** RMT/KIM Team/L&D Team **Timescale for completion:** To be agreed with RMT
			Departmental / office induction processes to include introduction to local records management procedures, including for electronic records and e-mails, for all relevant staff.	**Agree / Disagree** Agree **Proposed Action:** RMT/KIM Team to discuss with DIS Senior HR Manager (Paul Mann) **Person responsible:** RMT/KIM Team in liaison with Departmental Services Directorate **Timescale for completion:** To be agreed with RMT/DSD
			Embed records management procedures in relevant office procedures manuals and desk	**Agree / Disagree** Agreed **Proposed Action:**

			notes. This should include information on the management of e-mails.	KIM Team to liaise with RMT about form of words; Team also to liaise with Director of Information Services for Members (Bob Twigger) about possible introduction of an RM quality standard, to sit alongside other existing DIS quality standards **Person responsible:** KIM Team/RMT **Timescale for completion:** To be agreed with RMT
			Continue to develop the Records Champion network, including defining their role in induction and/or local training of staff, and the implementation and ongoing review of records management practices in their areas.	**Agree / Disagree** Agree **Proposed Action:** Identify RM Champions for areas currently without one (Media & Communications; POST); specified training to be compulsory for Champions (see above); KIM Team to discuss induction with DSD (see above) **Person responsible:** KIM Team/RMT/DSD **Timescale for completion:** 6 months (or as agreed with RMT)
			Where appropriate, include references to specific records management responsibilities in forward job plans, and review these activities in annual staff reports.	**Agree / Disagree** Agree, although RM Champions have already been strongly advised to include RM-related responsibilities in 08/09 FJPs (see paper on role previously supplied) **Proposed Action:** KIM Team to contact Champions to confirm they have done so; RM responsibilities and objectives to be included in Champions' PDM forms for 09/10 RY **Person responsible:** KIM Team in liaison with Champions, ROs and Heads of Section/Office

				Timescale for completion: Mid-May 2009 (or as specified by ASR timetable)
2	Electronic records are not subject to the same level of management as hard copy records, including disposal of electronic information in accordance with instructions in the Authorised Records Disposal Practice.	**1, 2, 5, 6, 7**	Department to continue work to ensure shared drive folders are organised as per the *Classification Scheme for Parliamentary Records* to ensure links between paper and electronic records and to facilitate efficient disposal in accordance with the *Authorised Records Disposal Practice* **NOTE:** *Once this work is complete, the Records Management Team should be contacted to review the structure and ensure it follows records management guidelines.*	**Agree / Disagree** Agree **Proposed Action:** Continuing work on new shared drive structure and migration of old material into new drive **Person responsible:** Gill Cooper/Katharine Schopflin **Timescale for completion:** August 2009
			Disposal instructions to be applied to records on shared and personal drives.	**Agree / Disagree** Agree (i.e. that they should apply equally to shared and personal drives as to hard copy), but unclear about how we can apply them **Proposed Action:** KIM Team to seek advice of RMT **Person responsible:** KIM Team in liaison with RMT **Timescale for completion:** August 2009 (i.e. to coincide with completion of shared drive work above)
			Initiate a programme to raise awareness and provide guidance for the management of e-mail, with a future aim of ensuring that much substantive e-mail correspondence is printed to paper, filed and classified in accordance with the records management policy. This may include producing and disseminating	**Agree / Disagree** Agree **Proposed Action:** KIM Team to develop/review in liaison with RMT **Person responsible:** KIM Team/RMT **Timescale for completion:** 6-12 months – guidance; ongoing - floorwalking

			guidance as to dealing with the 'backlog' of e-mails currently saved in Outlook folders, and floorwalking to provide assistance, agreeing a timetable for progress and spot-checking.	
			Those recently integrated offices which are not storing information on the former Library L: drive to audit folders on their network drives, removing obsolete and duplicate information before migration to the new department-wide drive.	**Agree / Disagree** Agree **Proposed Action:** KIM Team to liaise with Office RM Champions **Person responsible:** KIM Team/offices **Timescale for completion:** To be agreed with new offices, in context of timetable for migration of L:\ drive material to S:\ drive (see above)
			The department should put in place procedures for the management of shared folders on network drives (and in shared Outlook accounts if necessary) and assign responsibility for ensuring records held in these are managed in line with policy.	**Agree / Disagree** Agree, but this is someway towards being achieved as part of ongoing shared drive reorganisation/migration work (see above) **Proposed Action:** Continue working with Section/Office RM Champions **Person responsible:** Gill Cooper/Katharine Schopflin **Timescale for completion:** August 2009 (i.e. to coincide with completion of shared drive work)

| 3 | The department recently underwent reorganisation as a result of recommendations made by Sir Kevin Tebbit, leader of the review of the House of Commons Service. | 1 | Ensure that implications for record keeping as a result of the department's expansion are considered and addressed. Changes in functions and activities carried out might also have implications for the Classification Scheme and Disposal Practice (see recommendation 6(M) for recommendations specific to offices / directorates). An appropriate approach to ensure these offices are fully integrated into departmental records management best practice to be discussed with RMT. | **Agree / Disagree**
Agree
Proposed Action:
Consideration underway; KIM Team to liaise further with RMT about methods of address
Person responsible:
KIM Team/RMT
Timescale for completion:
To be agreed with RMT |