National Assembly for Wales

Records Management Policy

2007

The National Assembly for Wales is the democratically elected body that represents the interests of Wales and its people, makes laws for Wales and holds the Welsh Government to account.

Background

The Government of Wales Act 1998 ensured that records of the Assembly were treated like public records under the terms of the Public Records Act 1958 but from May 2007, after legal separation, the records of the Assembly will not be included in the definition of Welsh public records, and it will be the responsibility of the Assembly Commission to determine how to discharge the records management function.

During 2006, in preparation for the Third Assembly, the Assembly Parliamentary Service undertook work to separate the management of registered files from the Welsh Assembly Government.

The Assembly Parliamentary Service (APS) now has autonomy in creating and maintaining records and for arranging storage for those records thought worthy of permanent preservation.

A database has been developed to monitor the lifecycle of registered files and a network of records officers established to manage the day to day records activity across all work areas of APS.

Closed files are stored in the Pierhead, with access controlled by the Records Manager.

The existing paper registered filing system is currently the only official way to register, store, retrieve and preserve records of the Assembly with the provision of an inventory to facilitate this.

There will be many electronic items of information which may not be on these files; it will be up to individuals to assess whether these items should be officially recorded on the paper registry until the introduction of an electronic system to manage records and documents. Annex B provides an outline of how to identify a record.

This policy should be used to assist with the development of a corporate information management strategy. A component of which will be a proposal to review the current system used for records management, i.e. the paper registered file and to investigate the development of a more appropriate business classification system and an electronic document and record management system over the next few years.

Please note: The policy itself is quite brief but it is complemented by a series of Annexes which also provide specific, stand-alone guidance in the following areas:

- The Record Lifecycle (Annex A);
- Identifying Records (Annex B);
- Registered Filing System (Annex C);
- Roles and Responsibilities (Annex D);
- Glossary of Terms (Annex E)

1 Introduction

Records are a valuable resource and an important business asset; moreover, they help to build heritage. There will be records, which as well as being of value to the National Assembly for Wales will hold significant public interest. Equally there will be information which holds no business or public value. Therefore the responsibility lies with all staff to ensure that relevant records are maintained and are done so in a clear and concise way. The management of records is an integral part of routine business activities.

The efficient management of records is essential to the effective operation of the
organisation and our ability to access information to comply with relevant legislation, such as the Freedom of Information Act 2000, relies heavily on good records management systems, both paper and electronic formats.

Records provide an essential repository of information and evidence to evaluate past performance, inform future decisions and enable historical research. They also provide the basis for assuring accountability by demonstrating through clear audit trails how the National Assembly for Wales has met its legal, organisational, social and ethical obligations.

This policy sets out the corporate aims and principles for the management of all records, and outlines areas for future development. It provides the generic principles which apply to the management of documents and records, including their creation and registration, preservation, access, security and implementation.

The policy forms the basis on which the National Assembly for Wales will address the relationship between paper and electronic records. It will also inform the development of the corporate information management strategy and any related ICT strategy development.

Work on the development of a suitable electronic records and document management system (ERDMS), is in its early stages and we continue the use of the paper registered filing system, until such time as an alternative is implemented.

2 Aims

In providing a framework of good record management practices, this policy aims to ensure that:
- the Assembly has adequate records to meet its business and audit needs;
- the records management procedures and practices conform to any legislative requirements and best practice;
- the Assembly develops procedures to archive suitable material at a place which facilitates public access;
- responsibilities and accountability for records within the Assembly are clearly defined.

3 Policy Statement

The Assembly will document its business activities, decisions, actions and transactions, with records that are complete, authentic, reliable, secure and accessible and will manage those records in accordance with all legislative requirements throughout their lifecycle, in accordance with Annex A.

All records and records management systems must meet the requirements set out in Annexes B and C.

All staff of the Assembly are involved in record keeping and are accountable for compliance with this policy. Specific responsibilities and accountabilities are set out in Annex D.

4 Scope

This policy aims to meet the requirements of good records management for all of the records generated or held by the Assembly.

The policy covers:

♦ all records which document the organisation's activities, business decisions, actions, and transactions, whether they are registered files, unregistered papers, e-mail, automated office systems, databases, web documents, photographs, video recordings, fiche and other computer readable material;

♦ the requirements that must be met for the records themselves to be considered as a proper record of the activity of the organisation;

♦ the requirements for systems and processes that deal with records and the quality and reliability which must be maintained to provide a valuable information and knowledge resource for the whole organisation;

♦ the plan for implementation across the organisation;

♦ the resources needed to preserve the record intact;

♦ the policy governing record creation and registration;

♦ the policy governing maintenance and preservation, access, appraisal, retention, disposal and security;

♦ audit and review of the policy.

5 Definition of a Record

Within this policy, a record is defined as:

"Information created, received and maintained as evidence and information by an organisation or person, in pursuance of legal obligations or in the transaction of business" [ISO 15489].

Records can take any format, including paper, electronic and multi-media. An electronic record is defined as:

"a record where the information is recorded in a form that is suitable for retrieval, processing and communication by a digital computer".

6 Statutory and other requirements

The Assembly is required to meet statutory and other requirements with regard to records management, including:

♦ providing public access to information held by the Assembly under the *Data Protection Act 1998*, the *Freedom of Information Act 2000*, the *Environmental Information Regulations 2004*, and the *National Assembly's Code of Practice on Public Access to Information.*

♦ policies and procedures on best practice in records management.

7 Corporate Standards

Corporate procedures, practices and standards are essential to ensure that effective records management is consistent, systematic and sustainable. Records should be subject to well-defined, documented and robust procedures, adherence to which can be demonstrated across the organisation.

The Assembly records are an important source of administrative, evidential and historical information. This information is a corporate asset which co-ordinates with and contributes to the development of a corporate information strategy. Records management is an integral part of every business process and activity, and interrelates with other policies and strategies, for example:
♦ Information Management;
♦ Information Technology;
♦ Information Systems;
♦ Information Security;
♦ Risk Management

8 Implementation

The implementation strategy will aim to ensure that all members of staff are aware of their responsibilities for compliance with the Records Management Policy.

Procedural guidance and training will complement the policy to facilitate accurate
record keeping.

Any training requirements will be covered and, where necessary, these should be reflected in individual personal development plans, particularly for those members of staff who will have the responsibility of managing records within their work area..

The Records Management Operational Guidance will be regularly reviewed and updated to ensure that it complements this policy and facilitates best practice in records management.

9 Monitoring and Review

Compliance with this policy and associated procedures will be monitored by the Records Manager on an ongoing basis.

The Records Manager will also carry out an annual review of the policy and report to the Executive Board. This will address:
- whether everyone who should be, is aware of the existence of the policy;
- whether everyone, who should do so, is following the policy if not, what remedial action should be taken;
- identifying areas of operation not covered by the policy;
- advice on how to ensure the policy covers missing areas;
- obtaining feedback from users of records;
- whether the policy needs to be amended;
- all policy reviews will take into account the latest legislation and best practice

10 Storage

All active files will be stored in work areas for ease of access. Semi-current and closed files will be stored in the Vault Room located in the Pierhead Building. Access to files stored in the Vault Room will be through the Records Officers in liaison with the Records Manager.

11 Archive Policy

The Government of Wales Act 2006, places the records of the Assembly outside the meaning of Welsh public records, consequently the Assembly Commission is responsible for the records and is not subject to a statutory regime in relation to the maintenance of records.

The Assembly is therefore free to initiate policy with regard to the archiving of its records.

Options for the permanent preservation of records have been identified and further work is being undertaken to explore these options. Once a full evaluation has been made, the Assembly Commission will be asked to decide which option it would wish to adopt.

12 Vital Records

Vital records are those business records without which the Assembly could not continue to operate or without which it could not re-establish key functions following a disaster.

Vital records will include contracts and agreements and personnel and pay records.

The Executive Board will agree a schedule of vital records. If vital records can be duplicated, copies should be stored separately from the original. Where vital records are irreplaceable, or only replaceable at excessive cost, they should be afforded the highest level of protection.

Annex A
The Record Lifecycle

Introduction
The records of the Assembly will be managed systematically and consistently throughout their lifecycle, from creation to eventual destruction or permanent preservation.

Record creation

- Each service manager will ensure that all business activities, including those conducted in the electronic environment, are properly documented and that records are captured;
- All staff must have a clear understanding of which information (in paper, electronic, or other format) must be captured as a record;
- Business processes will be regularly reviewed to ensure they include the capture and registration of required records;
- Specific pieces of information that may require capture as records are those that:
    - commit the organisation or individual to an action;
    - document an obligation or responsibility;
    - comprise information which provides evidence of business activity.

Record registration and classification

- All corporate records must be filed systematically following corporate procedures and registered in a records management system;
- Registration of files will be carried out at divisional level, i.e. the divisional records officer will assign the file number, confirm the full name of the file and record all other relevant information on the Assembly's registered file database;
- At the time of registration, all record files will be named in accordance with the appropriate files series and given a retention period;
- Electronic databases, and other electronic records will be listed by division and provided to the Assembly Records Manager on an annual basis;
- Files series – main theme, sub themes and file names will be meaningful and appropriate to the records contained within them. View access to these will be available across the office;
- Individuals holding record items are responsible for allocating them to a file series and identifying appropriate main theme and names for the file;
- Checks will ensure that the correct records have been allocated to the sequence and that meaningful titles are used.

Record maintenance and preservation

- Storage facilities for records must be clean and tidy, prevent damage to the records and take employee health and safety into consideration;
- Storage areas and/or equipment must be safe from unauthorised access and meet fire regulations;

- Storage arrangements must allow maximum accessibility to records taking into consideration their frequency of use;
- All records must be maintained to ensure that their content, context and structure are present and that they can be accessed, interpreted and trusted for as long as the record is required. These preservation needs must be addressed when there are changes in:
  - the technology that processes electronic records;
  - organisational structures where these provide the context for records;
  - the definitions of terms used in the records and in the descriptive information (metadata) about the records;
  - the registration structure of records, including how they are grouped and described, so that they can be presented in a way consistent with the original understanding of the subject when the record was created;

- The Assembly's business recovery plan will include arrangements and provisions to ensure that users will still be able to access records critical for business continuity;

Record appraisal, retention and disposal

- Records and record files will be closed as soon as they have ceased to be used actively. When a record has been closed, this must be shown on the record itself and be recorded on the records management system;
- All closed records will be appraised using the Assembly's record schedules for retention and disposal as appropriate. This will determine which records are selected for permanent preservation, which are designated for destruction, the authority required to authorise destruction and the record's retention period.
- Best practice criteria from the National Archives will be considered in developing revised retention and disposal schedules;
- The destruction of any records will be authorised by the designated authority (usually Head of Service) and recorded on the records management system;
- When records have reached the end of their administrative life and their destruction has been authorised, they will be destroyed in a secure manner;
- If a record due for destruction is known to be the subject of a request for information, destruction must be delayed until after disclosure or all time periods to allow for complaints and appeals provisions have been surpassed.

Annex B
Identifying Records

Records requirements

- Documents (including electronic material) that should be captured as records include transactions that concern official business and may involve one or more of the following:
    - requests for a reply or action;
    - a decision or response;
    - advice or recommendations;
    - notes or records that explain the reasoning behind advice or a decision;

- Records of a business activity must be complete and accurate enough to allow staff and their successors to undertake appropriate actions in the context of their responsibilities, to:
    - facilitate an audit or examination of the business;
    - prove authenticity of the records so that the evidence derived from them is shown to be credible and authoritative.

- All records within the Assembly are to be clearly identified, preserved and stored for the required period.

- In order to ensure that the information constitutes a record, the Assembly will ensure that:
    - **the record is present** – the information needed to reconstruct activities or transactions that have taken place is recorded;
    - **the record can be accessed** – it is possible to locate and access the information and present it in a way that is true to the original presentation of the information;
    - **the record can be interpreted** – a context for the information can be established showing when, where, and who created it, how it was used and how it relates to other information;
    - **the record can be trusted** – the information and its representation exactly matches that which was actually created and used, and its integrity and authenticity can be demonstrated beyond reasonable doubt;
    - **the record can be maintained** – the record can be deemed to be present and can be accessed, interpreted and trusted for as long as necessary and on transfer to other approved locations, systems and technologies.

- Once designated as a record the document is no longer 'owned' by the creator but by the Assembly.

Annex C
Registered Filing System - Records Management Systems

Access

For the immediate future the only recognised system for managing records will be the registered filing system. In order to maintain business continuity whilst work is undertaken to assess and identify the best way for managing Assembly records in the long term, staff will use a database as a central registry for the current registered filing system. This will be stored in a central location and access will be given to allow the file series and names to be viewed by all members of Assembly staff. All members of staff who have the designated responsibility for creating and managing registered files will have full access to the database.

With full viewing access to the file list, members of staff will be able to identify whether a new file needs to be opened for their records or whether a relevant file already exists that would be logical for their records to be stored on.

It may be necessary to restrict access to file series which have been judged by senior management to be sensitive; such series would have relevant access controls in place and will be monitored by the Records Manager.

Security

Records form a corporate story and the majority of the records of the Assembly will hold public and historical interest, the Assembly will take all reasonable steps to ensure that records and processes dealing with them are secure.

Once recorded and registered in the filing system, they will be safe from alteration, misinterpretation or loss. The steps include:
- informing staff and complying with records management best practice;
- using the corporate policy and organisational procedures and helping to revise policy and procedures when they need to be updated;
- training staff to use the records register for an accurate representation of the records, naming files appropriately, thereby ensuring consistency in record registration;
- auditing the systems to trace any deviation from procedure;
- offering solutions to rectify mistakes or altering the procedures to accommodate better ways of working;
- ensuring that there is adequate protection of vital records.

Strategy for electronic and paper records

The Assembly will develop a long-term strategy which will consider the implementation of an electronic document and records management system and

will address how the relationship between electronic and paper records might evolve.

Should an electronic system be introduced it will need to be maintained through successive upgrades of the Assembly's office hardware and software.

The Assembly will need to monitor electronic records and potential electronic records to ensure that:

- records that should be captured are being processed electronically if they do not appear in the paper record;
- there is no unwarranted duplication between the paper and electronic record collections;
- there is a distinction made between the electronic documents which are printed, printed records that reside in the paper record systems and other original documents that are retained as electronic records (possibly to be passed to an electronic record keeping system);
- the implementation of any record management system should clearly show where the record is located and in which form it is held.

**Annex D
Roles and Responsibilities**

Functional responsibility

Every member of staff, wherever located, and whatever their role, is responsible in some way for records. Records management is a specific corporate function within the Assembly and will receive necessary organisational support to ensure effectiveness. The function brings together responsibilities for records in all formats throughout their lifecycle, from planning and creation to archive or disposal. It has clearly defined responsibilities and objectives, and resources to achieve them.

All Assembly Staff

The responsibilities of all staff who create, receive or use records in the course of
their work are:
+ identifying which documents should be captured as corporate records;
+ creating, capturing and filing records in line with corporate policies and procedures;
+ using records responsibly with proper regard for audit trails and security mechanisms;
+ complying with the Records Management Policy.

Executive Board

The Board is responsible for ensuring that:

+ the Records Management function is recognised as a fundamental corporate function and that it has adequate resources and support to be executed in accordance with the policy;
+ the Records Management policy is accounted for in any new strategic or organisational developments, particularly concerning information management and ICT structures;
+ the Assembly has the appropriate system in place for capturing, storing, maintaining and retrieving records;
+ annual reporting is undertaken and the information is captured as part of the corporate plan / risk management assessment.

Section Responsibility

Each Head of Service must ensure that all their managers responsible for business activities, decisions, actions, transactions and processes are:

- ensuring that all business activities are properly documented and that accurate and reliable records are created and maintained;
- determining how long records should be retained to meet operational and administrative needs in accordance with the Assembly's record schedules and provide the authority for record destruction;
- liaising with the Records Manager when issues arise;
- ensuring that records management requirements are incorporated into business processes and consistently implemented by their staff;
- ensuring their staff comply with the Records Management Policy;
- working with line managers and HR to ensure that, where relevant, explicit responsibility for records is included in role specifications, job descriptions and employees' personal objectives;
- assessing records-related training needs for key staff, as identified through personal development plans.

Heads of Service will appoint a member of staff as a records officer to administer the registered files of the section. The records officer will be responsible for:

- identifying suitable files series and liaising with colleagues;
- keeping the central registry database up-to-date;
- ensuring that registered files are being created in accordance with the Records Management policy and guidance;
- assigning file references, opening, closing and updating files accordingly;
- maintaining information about the movement and use of records;
- conducting record appraisal and destruction with Head of Section authority;
- obtaining files from storage on behalf of all members of their section, by liaising with the Records Manager.

Assembly Records Manager

The Assembly will appoint a member of staff who will have a central corporate responsibility to ensure that records are being managed in accordance with this policy. The role of this individual will be to:

- lead the development and management of the corporate records management infrastructure – the framework of policies, procedures and systems which define, structure and control the way in which records are captured and managed;
- facilitate and support the implementation of these policies, procedures and systems;
- ensure that the Records Management Policy and procedures comply with best practice;
- provide records management guidance and support to colleagues throughout the organisation;

- provide advice and guidance to staff responsible for divisional records;
- manage arrangements for storage of inactive and archive records;
- oversee record appraisal and destruction carried out by sections;
- participate in the planning of business processes and systems to ensure record-keeping requirements are identified and records management issues are addressed;
- provide training in records management;
- work with HR to ensure that adequate information on records management is included in the induction programme.

Glossary of Terms

Access   The availability of or permission to consult records

Appraisal   The process of evaluating an organisation's activities to determine which records should be kept, and for how long, to meet the needs of the organisation, the requirements of public accountability and the expectations of researchers and other users of records.

Archive   The movement of records from one system to another.

Capture   The process of determining that a record should be made and kept.

Database   An organised collection of inter-related data. It consists of two parts: the elements or individual pieces of data contained in the database (the content) and the structures which organise these pieces. Both the content and structures are essential parts of the database records.

Destruction   The process of eliminating or deleting records, beyond any possible reconstruction.

Disposal   The implementation of appraisal and review decisions. It comprises: the destruction of records and the archiving of selected records for permanent preservation.

Document   A minimum unit of paper or its electronic equivalent. Where not otherwise specified a document includes paper and electronic formats, as well as e-mails, video, web page, audio tapes etc.

Electronic   A document that has been captured within the ICT
Document   infrastructure, ie. Outlook, P:drive, H:drive etc and electronic document management system. It includes documents generated in-house, scanned images of paper documents and e-mails.

Electronic   Records where information is recorded in a form that is suitable
Records   for retrieval, processing and communication by a digital computer (see Record below). They may be in the form of databases, electronic mail, spreadsheets, word-processing files, or multi-media communications.

File   A collection of documents – either a physical file of paper documents or a notional collection of electronic documents with a common theme.

Record	Information created, received and maintained as evidence and information by an organisation or person, in pursuance of legal obligations or in the transaction of business [ISO 15489]. They include sufficient content, context and structure to provide evidence of that activity. Records are not ephemeral; they contain information that is worthy of preservation in the short, medium or long term
Record / File Series	A collection of records which all relate to the same business activity and have the same retention period and access permission.
Registration	The process of recording brief descriptive information about the record in an inventory or filing database and assigning the record a unique identifier. It is a way of formalising the capture of the record into the records system.
Retention	The continued storage and maintenance of records for as long as they are required by the organisation until their disposal.
Retention Period	The length of time before permanent storage as an archive or destruction, usually based on an estimate of the frequency of use for current and future business and taking note of any long-term historical value of the record.
Record Schedule	A systematic listing of records created by an organisation, which sets out the retention periods of records from the time of their creation to their disposal. It is a continuing authority for implementing decisions on the value of records specified in the schedule