

Office of the Information Commissioner

RECORDS MANAGEMENT HANDBOOK

November 2004

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1. Introduction

In Summer 2003 a project team was established within the Office of the Information Commissioner (OIC) to look at how the Office manages its records environment after five years in existence. The team comprised Des O'Neill, Mary Byrne and Cathal Duffy and following staff surveys and a review of existing arrangements, a report was produced in Autumn 2003 which provided a number of recommendations as to how the Office should manage its records environment going forward.

The report was then referred to PA Consulting who were engaged to provide the OIC with expertise in the area of records management. Following consultation with the Committee, a Records Management Framework document was agreed and presented to management which incorporated a prototype operational handbook which outlined the standards, policies and procedures required to put in place a fully functioning records management infrastructure.

A Records Manager (Cathal Duffy) was then appointed and, as an essential interim step, an overhaul of a number of the existing databases was undertaken particularly OIC Typists General and Office Files. The Framework document was also copied to all staff who were invited to make submissions, comments or recommendations on its content in advance of the publication of a formal Records Management Handbook.

The Handbook has now been finalised having regard to all of the various staff contributions and in the context of changes brought about as part of the records management project, such as the installation of a new hi-spec scanner.

The process also involved meeting with the Office of the Data Protection Commissioner and the National Archives and securing their agreement to proceed on the basis as outlined in this Handbook.

2. Records Management: the Context

The International Context

Records Management is becoming an increasingly important part of corporate governance in organisations of all sizes worldwide. An important factor in this heightened awareness of the role of Records Management is ISO 15489 which was published by the International Standards Organisation in September 2001 and has since been adopted by the National Standards Agency of Ireland.

Experts from Europe, North America, Asia and Australia developed ISO 15489 to ensure that a common standard was established and it has emerged at a time when Records Management in Ireland has become increasingly important in the context of the introduction of the Freedom of Information Acts, 1997 and 2003 and the Data Protection (Amendment) Act, 2003.

ISO 15489 is aimed at individuals responsible for setting policies, standards and guidelines for information management within organisations including records managers, archivists, librarians and database managers. It sets out a comprehensive framework and methodology for the design and implementation of a sustainable Records Management infrastructure and includes guidelines for doing so with a description of the actions and outputs that are required at each of the following eight stages.

1. Preliminary assessment including staff surveys
2. Detailed analysis of existing work practices
3. Identification of a framework outlining what is required
4. Detailed analysis of existing systems
5. Identification of a strategy to meet requirements
6. Design of a Records Management system
7. Implementation of the new Records Management system
8. Post-implementation review and ongoing assessment

ISO 15489 is however just one of several national and international standards that provide such guidelines. According to the World Bank, a properly functioning Records Management infrastructure within an organisation requires:

1. appropriate management structures and trained staff ,
2. adequate and continuous funding,
3. appropriate environmental conditions and physical security,
4. awareness and compliance with legal requirements such as Data Protection, and
5. computer systems that fully meet current and future business requirements whereby:
 - upgrades are provided when required to sustain efforts ,
 - source data is well organised , accurate and easily accessible,
 - a reliable power supply is available with realistic back-up and storage procedures, and
 - adequate communications and sustainable technical support are provided.

The OIC Context

The OIC relies on records to conduct its business. Records are essential for the effective and productive functioning of the OIC and without a records management infrastructure the OIC would be incapable of managing current operations and would have only limited ability to use the experience of the past for guidance in future.

The OIC's records, both hard-copy and electronic, document decisions taken and activities carried out and serve as a benchmark by which future activities and decisions can be measured. Without proper management of these records, staff will increasingly be forced to take decisions on an ad hoc basis without the benefit of organisational memory. Records management is therefore inextricably entwined with increased transparency, accountability and good corporate governance.

The absence of a proper records management framework is directly linked to inefficiencies and increased costs. The OIC's previous policy of retaining all records indefinitely was inadequate and would leave the Office unable to cope with the growing mass of unmanaged records. This would make it ever more difficult for staff to retrieve the information they need to manage workloads and to make informed recommendations and decisions. The fact that the Office creates, receives and retains both hard copy and electronic records

would, in time, compound problems in this regard. Accordingly, it is clear that the OIC needs to ensure that its electronic information systems and databases are not set on top of an inadequate paper filing system which in time would result in two detached regimes that would become incapable of being managed in unison.

3. Why a Handbook?

This Handbook provides a framework to facilitate the consistent management of OIC records. The aim of this Handbook is;

- to co-ordinate records management standards, policies and procedures which support the OIC business plan and organisation strategy,
- to facilitate a more consistent approach to organising activities and documents,
- to ensure that all standards, policies and procedures are traceable to one of the High Level Goals contained in the business plan,
- to improve security and confidentiality controls, and
- to reduce costs to the organisation in terms of time spent looking for a particular record and in terms of freeing up storage space that may be currently used to retain records that are never going to be required again.

In drawing up this Handbook it is intended that it should;

- be appropriate for this organisation and our requirements,
- be used and enforced on a regular basis by all staff members,
- be communicated to all staff,
- increase staff awareness of the role of records management in supporting organisational efficiency,
- avoid complexity where a simple solution will suffice,
- be complete and thorough and address all relevant record management issues,
- be flexible to changes in our business strategy, and
- be efficient and cost effective.

4. Records Management Standards

The OIC Records Management Standards are a set of principles that define how documents and records components are to be created, managed and used by this Office. Without such standards, and as the number of records increases substantially as each year passes, the OIC would find itself with uncoordinated approaches, architectures and processes which are incohesive and costly in terms of resources and which will become increasingly difficult to manage.

It is essential that all OIC Staff familiarise themselves with these standards and adhere to them.

- **Document and Record Standard**

1. Lotus Notes is the principal office tool for the creation of documents and records and should be used for all document and record management activities. The only exception to this would be when staff may wish to avail of facilities offered by the IT Unit to prepare presentations that may, for practical or technical reasons, have to be produced using non Lotus Notes tools such as Powerpoint etc.

- **Database View Structure Standard**

1. Databases within Lotus Notes are defined by the data contained within them and the various "views" are used to present that data to the user.
2. Wherever possible, a Lotus Notes database should have a hierarchical structure which facilitates the logical storage and retrieval of data.

5. Records Management Policies

The OIC Records Management Policies are required to provide guidelines to all OIC staff on the handling of documents and other forms of records. These policies are closely linked to procedures which describe the step-by-step tasks for complying with a policy. Without policies staff may make decisions on the retention and storage of documents and other forms of records that are uncoordinated and which result in inefficiencies and increased resource costs.

It is vital that staff are familiar with and adhere to these Policies.

- Filing of Hard-Copy Documents

1. All hard-copy documents must be filed as soon as it is possible to do so.
2. All case related hard-copy documents must be placed in chronological order on the appropriate case file.
3. All other hard-copy documents must be placed on the appropriate Office File, or other as appropriate.
4. Any queries in relation to the appropriate file that a particular document should be placed on should be directed to the HEO in the Support Unit or to the Records Manager.

- Responsibility for Filing of Documents

1. The person responsible for a hard-copy case file is the official recorded as the "case worker" on the case tracking system.
2. It is the responsibility of all staff to ensure that they have been recorded as the "case worker" each and every time they take physical possession of a case file.
3. All documents relevant to a case file should be passed to the "case worker" as soon as possible and that person is then responsible for filing the latest documents received.
4. As regards non-case related documents, it is the responsibility of the "relevant" official to ensure that documents created and/or received are properly filed and can be readily accessed both physically and electronically.

5. The "relevant" official is the signatory to a document that originates in the Office or, if the document was submitted to this Office by a third party, the person to whom the correspondence has been addressed. If the correspondence is not addressed to any particular official, if it is addressed to the Commissioner, or if it is sent to the wrong official, it is the responsibility of the person who ultimately deals with the correspondence to ensure that it is properly filed.

- Scanning of Hard Copy Documents

1. All hard copy documents received, except the actual records that are the subject of a review, must be scanned and saved in the appropriate file on the case tracking or other database, as appropriate. Exceptions would be hard-copy documents received that are of no value to the Office, such as innocuous circulars or publications, including documents received in error, that are not being placed on a hard-copy file.
2. Hard copy documents being placed on a hard copy file must be scanned onto the electronic version of that file thereby ensuring consistency between the two systems which in due course will facilitate destruction of the hard copy version in accordance with the policies that are referred to below.
3. If hard copy documents are received which are difficult to scan, such as bound publications etc., the Office should request the sender to forward an electronic version of the document. If an electronic version is not available, the cover of the document should be scanned and a "Quick Note" created to indicate that a full version of the document has been placed on the hard copy file.

- Logging of General Enquiries

1. Apart from innocuous enquiries directed to or received by the Office in error, all enquiries dealt with by the Office should be recorded on the General Enquiries database. This would include enquiries received by phone, letter, fax, e-mail and from persons who call to reception. Such enquiries should not be recorded as EGENs on the case tracking system.
2. The General Enquiries database provides for the capture of the name and address of the person making the enquiry, their query and the nature of the answer provided and these should all be recorded to the greatest extent possible. Enquiries received by letter or fax should be scanned onto the database and those received by e-mail should be copied onto the

database.

3. In the case of persons who call to reception or elsewhere to make a face to face enquiry, these details should also be entered onto the database.

- Case and non-Case Related Typing Policies

1. All case related typing should be created and retained in the appropriate case file on the Case Tracking database. No case related work should be created or saved elsewhere e.g. in the OIC Typists General database.
2. Non-Case related official typing should be carried out in the appropriate folder of the staff member concerned in the OIC Typists General database. All staff members should save any such typing in a folder under their own name within this database. If a record created in the OIC Typists General database becomes official and is finalised i.e. it is issued, published, circulated or retained as a final document, it must be then copied and moved into the appropriate file in the Office Files database and be deleted from the OIC Typists General database i.e. the record should not be retained in two separate databases. Staff should not create draft documents in the Office Files database as this should always reflect the final position of a document. This is not to say that short memos or notes of meetings etc. cannot be created in Office Files but it is important that they are finalised immediately and not left as a work in progress.
3. Draft documents created in OIC Typists General that are not subsequently finalised should be deleted as soon as the staff member that created the record is satisfied that it will not be required and therefore has no retention value. Deletion of records from the Typists General database can only be carried out by the HEO in the Support Unit or by the Records Manager. Accordingly, when staff wish to delete a record, they should contact one of those persons, preferably by way of an e-mail with a link to the record in question.
4. All staff also have a Private Typing database which should generally be used only for the creation of personal records. It is important that this database is not used for drafting case related or other official OIC work which other OIC staff may require urgent access to e.g. when staff are on leave etc. Personal records of staff should not be created or saved in any other database, such as OIC Typists General, as all OIC staff have open access to all records in OIC related databases e.g. staff member A can view the content of staff member B's folder in the OIC Typists

General database.

- Case Work Retention Policies

1. All review applications received are allocated a case reference number and both a hard-copy file and an electronic case record is created even if the application is subsequently found to be invalid or is not accepted for whatever reason.
2. As regards records retained electronically on the case tracking system, these records should be retained for a period of seven years. There are two exceptions to this policy. The first applies to the actual decision letter in cases where a decision issued under section 34(2) of the Acts. Decision letters are to be retained indefinitely on the case tracking system. The second exception applies to the electronic records relating to a case that is or has been the subject of a High Court appeal and also a small number of cases that are considered to be of "precedent value" (e.g. the decision taken has been published on our website and may also include a number of reviews given a category 3 ranking by the Investigator).
3. All hard copy records of both reviews carried out and applications that were not accepted should be destroyed one year after a final decision has been taken. Exceptions to this policy are cases that are or have been the subject of a High Court appeal and cases that are considered to be of precedent value, as per above, hard copies of which should be retained indefinitely.
4. Apart from cases that have been or are to be the subject of a High Court appeal, the Office will seek to return all of the records that were the subject of a review to the public body concerned eight weeks after the Commissioner's decision or immediately if the case has been withdrawn or settled. If the public body indicates that it does not want the records to be returned, they shall be shredded as soon as possible by OIC staff.

- Non-Case Work Retention Policy

1. An electronic version of all non-case work records must, where practicable, be created. All letters, notes, reports, memos and other records created by staff must be saved, when finalised, in the appropriate electronic Office File or General Enquiries database. All correspondence received from outside of the OIC must be scanned or, if

applicable, an electronic version should be sought and saved in the appropriate file.

2. The electronic version of all Office Files can be retained indefinitely subject to the Personal Data Retention Policy. However, apart from sensitive original documents that may be required to be retained in that format, hard copy records can be destroyed one year after receipt provided an electronic version has been created. Where it was not possible to scan or acquire an electronic version of a record, the hard copy will be retained on file, subject to the Personal Data Retention Policy, for as long as it is considered by a Senior Investigator to be of retention value.
3. Given that all correspondence in relation to General Enquires is captured electronically, it is not necessary to retain hard copies of such correspondence for longer than one year after the enquiry was dealt with. The electronic record of such enquiries must be retained for seven years and then deleted.

- Statistical Records Retention Policy

1. All statistics generated must be filed both electronically and on the appropriate hard copy file.
2. All such statistics, apart from those that relate to identifiable individuals, should be retained indefinitely in electronic format whilst hard copy records should be destroyed in line with the general policy of destroying hard copy non-case related records after one year.

- Personal Data Retention Policy

1. Apart from the exceptions referred to under the Case Work Retention Policy, all personal data held in respect of case work should be deleted/ destroyed after seven years.
2. If any personal records whether hard-copy or electronic, such as statistics generated in respect of identifiable individuals, are held on the Office Files or other databases and are over seven years old, these must be reviewed each year in order that a decision can be taken as to whether they still need to be retained and, if so, whether they can be anonymised i.e. if the record must be retained is it still necessary to identify the person about whom the record relates.

- Recording of E-Mails and Faxes Received
 1. All case related e-mails and faxes received electronically must be copied and saved, either by way of clicking on the "Receive" button in the appropriate "Review Details" page or by creating a "Quick Note" under the appropriate case reference on the case tracking database. *In the case of faxes received electronically, it may be necessary to amend this policy to provide that all faxes must be scanned on to the database rather than copied. If this arises, an addendum to this Handbook will be issued.*
 2. All attachments received by e-mail must be sent to the IT Unit for virus scanning before being opened.

- Destruction of Hard Copy Records
 1. Records that are to be destroyed should be shredded , if necessary by an external firm under appropriate supervision.

- Electronic capture of all relevant events
 1. It is the Office policy to electronically capture all relevant events in relation to reviews and also all relevant information in relation to issues that arise which result in copies of correspondence being filed on the Office and General Enquiry filing systems and databases.
 2. Accordingly, annotations, unless innocuous, should not be entered on hard copy records. An electronic (typed) note should be created and saved under the appropriate electronic file thereby ensuring that a record of all relevant events is retained and will not be lost when the hard-copy file is destroyed. If a hand written annotation is made on a record , by the Commissioner for example, then that document should be scanned and saved under the appropriate file before the case is closed.
 3. The case closure checklist provides that the Investigator responsible for a case must ensure that this policy has been adhered to before the file can be returned to the Support Unit.

6. Records Management Procedures

This section describes specific procedures for Records Management within the OIC. In general, the requirement for such procedures is determined by the complexity of the business processes and accordingly it is clearly not necessary to define procedures which are readily understood by staff. However, in respect of the following procedures which are deemed sufficiently important to be included, any failure to follow them can lead to inefficiencies, including duplication of work and higher operating costs, and critically, the possible loss of records not intended for destruction.

All OIC Staff should familiarise themselves with these procedures and fully adhere to them if and when they are carrying out any of these procedures.

- Document and Database Housekeeping Procedure
 1. The content of all files and databases, both hard copy and electronic, should be reviewed periodically by the Records Manager with the assistance of the Support Unit.
 2. Starting in January 2006, the hard copies of all '04 cases that were closed during 2004 and '98 cases closed during 1998, including applications refused, should be moved to a single secure location in the Office and considered for destruction in accordance with the Case Work Retention Policies. In January 2007, the hard copies of all '04 and '05 cases closed in 2005 should be treated similarly as should all '98 and '99 cases closed in 1999 and so on each year thereafter.
 3. Also in January 2006, all '98 cases closed during 1998, including applications refused, should be examined on the case tracking database and considered for deletion in accordance with the Case Work Retention Policies. In January 2007, all '98 and '99 cases closed in 1999 should be treated similarly and so on each year thereafter.
 4. Starting in January 2005 and continuing each year thereafter, the hard copy and electronic Office Files should be examined with a view to destroying/ deleting material that it is no longer necessary to retain in accordance with the Non-Case Work Retention Policy.
 5. Starting in January 2006 and continuing each year thereafter, the review and destruction of hard copy General Enquiries records should commence in respect of all enquiries received and dealt with between November

2003 and December 2004.

6. As regards the deletion of electronic records of General Enquiries, this should commence in January 2011 in respect of enquiries dealt with and finalised in 2003 and so on each year thereafter.
7. The hard copy Office Files should be reviewed every January, in accordance with the Non-Case Work Retention Policy, with a view to removing obsolete documents and those that have been captured electronically for longer than one year. The electronic Office Files should also be reviewed every January to ensure compliance with the Non-Case Work Retention and the Personal Data Retention Policies.
8. The Typists General database should be reviewed quarterly by the Records Manager to ensure that obsolete draft documents, or documents already copied into Office Files, have not been retained unnecessarily.
9. Full completion of all of the above measures should be recorded on the electronic "Housekeeping Check-list" found in file no. OF/OIC/006/001/002.

- Case File Shredding Procedure

1. All case files that are to be shredded must be separated from those of a similar vintage that are being retained. A spot check of 10% of all such files, apart from those which are simultaneously subject to electronic deletion, must be carried out in order to ensure that an electronic version of such records has been retained. These spot checks should be documented on an electronic check-list which should be saved in the Office Files database.
2. The shredding of such files should only be carried out in a location or at a time that will ensure that no other work, particularly paperwork, is being carried out in the vicinity of the shredding operation and in order that staff engaged in the task are not interrupted thereby ruling out the possibility of any other records being accidentally shredded.
3. As each case file is shredded, the details must simultaneously be entered on the "Review Details" screen on the case tracking system in order to reflect the fact that the file has been destroyed. The name of the official carrying out the shredding, as well as the date and time of the event must be recorded.

- Other File and Document Shredding Procedure
 1. In the case of records that were the subject of a review, which is not the subject of a High Court appeal, and which are not being returned to the public body concerned, these shall be shredded as soon as possible by a member of staff from the Support Unit. Such records must not be placed in a confidential waste bin.
 2. Other documents that are being destroyed, such as those removed from hard copy Office or General Enquiries Files, can be placed in the confidential waste bin for shredding unless considered to be of some sensitivity, in which case they should be shredded by OIC staff.

- Record Deletion Procedure
 1. The deletion of electronic records, whether case related or otherwise, must be carried out with the assistance of the IT Unit. No records should be deleted without having made prior arrangements with the IT Unit to do so.
 2. It is essential in making such arrangements that the records in question are being permanently removed from all systems and are not being moved into any auxiliary or archival storage facility. This is essential for compliance with the Data Protection Acts.
 3. More detailed procedures in this regard are to be drawn up, before any records can be deleted, in consultation with the IT Unit and will be incorporated into future updated versions of this Handbook.

- Scanning of non-Case Work Records Procedure
 1. The post is opened by the Support Unit and correspondence which is non-case related is passed to the relevant official. The relevant official must then return the correspondence to the Support Unit for scanning and should clearly indicate which Office File, or otherwise, that the document(s) should be scanned and saved under. If the document is difficult to scan, the Support Unit should request an electronic version.
 2. All of the above steps should, where practicable, be carried out within a maximum of three working days of receipt of the document(s) in question. It is vital that the relevant official passes the document(s) back to the Support Unit as soon as possible as any delay in this regard increases the likelihood that the document(s) may not be scanned at all.

7. Governance Mechanisms

In order to ensure that the standards, policies and procedures remain current and relevant, it is essential that they are reviewed on a regular basis. Due to legislative changes and other external factors which can affect the operation of the Office, such reviews should be carried out in an appropriate time frame. For example, if there is a change to the FOI Acts or Regulations which impacts on the OIC, the Handbook should be reviewed immediately in order to maintain relevance.

Staff are encouraged to recommend changes to the Records Manager at any time throughout the year.

Depending on circumstances, changes to the Handbook can be made at any time, either by way of issuing an addendum or by republishing. Otherwise an annual review is sufficient and will be carried out each August after consultation with all staff and a revised Handbook then published with all staff being informed of changes.

A member of OIC staff at Investigator level is to carry out the role and responsibilities of Records Manager whilst the HEO in the Support Unit is responsible for the day to day OIC Records Management activities that arise.

It is the responsibility of the Investigator managing the Reference Database to ensure that all material contained thereon is in compliance with this Handbook. In respect of case work records, the Reference Database for the most part only contains copies of published research, judgments and actual decision letters (which are being retained in any event) and therefore it is not envisaged that this Database would contain very many records that would be required to be deleted or anonymised etc. in accordance with this Handbook.

It is acknowledged that this first Records Management Handbook does not cover all of the record types, files and databases used by OIC staff. Later versions will encompass policies and procedures in relation to OIC records held in respect of FOI requests to the OIC, on the FOI Mail database, in Corporate Services Unit and in the Commissioner and Director General's Offices.