

**MANAGEMENT BOARD****MANAGEMENT OF INFORMATION**

*Paper from the Director General of Information Services*

**Purpose**

1. I was asked at the last Board meeting to investigate various issues related to information management and to report back to the Board on 22 May. This paper meets that remit and invites the Board to endorse an approach to information and records management that recognises its importance and provides assurance that agreed policies for paper and electronic records are followed. The paper has benefited from the contributions of colleagues in several departments across both Houses.

**Recommendations**

2. The Board is invited:
- a. to note the current position in relation to various classes of information that have been the subject of recent Freedom of Information requests;
  - b. to note the current policy on records management;
  - c. to adopt a series of principles on knowledge and information management;
  - d. to note the recently produced digital preservation strategy for Parliament;
  - e. to agree an approach to assuring compliance with policy across the House;
  - f. to agree that further policy proposals be brought back to the Board in January.

**Background**

3. The records management team of the Parliamentary Archives sets the bicameral policies and practices for managing records, including the Authorised Records Disposal Practice (ARDP). Heads of Department have responsibility for the application of the Parliamentary Records Management Policy in their area. Record Officers, appointed by each department, oversee the compliance with records management policy and practice within their department.

4. Despite the appointment of Record Officers and the availability of training and guidance to staff, the application of the ARDP varies widely across the House. A 2006 survey of records management practice showed that staff feel that managing the information they create and receive is low priority.

5. A rolling programme of field visits across both Houses was initiated by the Parliamentary Archives in 2006 to try to support managers in addressing

the failure to apply records management procedures consistently across hardcopy and electronic systems.

6. At the same time, information management more generally was identified as one of the six priority areas for the House of Commons administration in the period 2006-2011. The development of SPIRE, the electronic document and records management programme, has been a key element of this process.

7. More recently, concerns about information security arising from incidents elsewhere in the public sector have prompted a review of policy and practice within Parliament. These are the subject of a separate paper from the Security Co-ordinator. The growing importance of Freedom of Information and data protection issues has also significantly raised the profile of this issue.

8. Policies are relatively easy to create. Assuring consistent application of those policies across hardcopy, live electronic material and electronic material that is backed-up or retained in deep digital storage in the custody of many hundreds of people is harder. It requires a concerted effort to create a culture in which good records management, including appropriate disposal, is the norm and is systematically supported by the organisation.

9. The Board is invited to note the current situation in relation to information on Members' expenses and other transactional information as set out in Annex A and the current policy as set out in Annex B.

### Action to date

10. In taking forward the corporate plan commitment to improving information management, a series of knowledge and information management principles (Annex C) have been drawn up by colleagues under the leadership of Liz Hallam-Smith in the House of Lords and have been agreed by the Lords Management Board. These principles are inevitably high level but with the endorsement of both Management Boards would assist those staff with responsibilities in this area to assure compliance. **The Board is invited to adopt the knowledge and information management principles at Annex C.**

11. In addition, a digital preservation strategy for Parliament has been drafted with a roadmap for implementation in the period to 2011-2012. This strategy is subject to funding constraints within the Archives and the PICT programme and individual elements will be subject to the acceptance of business cases in the usual way. The Board is invited to note this strategy (Annex D).

12. The SPIRE Programme (EDRM project) has been given priority within the PICT programme for 2008-09 and will be working over the coming months to get a clear identification of Parliament's requirements, albeit in selected areas of the business in the first phase.

### Assuring compliance

13. These various initiatives provide a strategic response to the problems we face but it will be some years before benefits will be fully realised. In the short term my assessment of the current situation prompts me to propose that we adopt a corporate, dirigiste approach with the aim of delivering compliance with existing systems by October 2008. From discussion with various managers across a number of departments I believe that the following audit-based process will be feasible:

- By end-May: Director Generals appoint a records management champion for their department with authority to prepare their department for audit
- By end-June: Archives, PICT and FOI/DP officer draw up and agree with Director Generals a specification for a risk-based audit of compliance.
- By end-October: Departments undertake compliance work designed to meet the audit specification
- By end-November: Archives and PICT assess compliance and issue reports of their assessments to Director Generals
- By end-December: Director Generals complete management responses to audit
- January 2009: report back to the Board.

Identifying owners of different sets of information is critical in facilitating the assessment of what we have and how much of it. The audit process and responses of management should solidify thoughts on who owns what. None of this should be allowed to distract departments from carrying out existing data management tasks such as routine destruction of old data in accordance with the ARDP.

14. The Archives will switch focus from the field visits to the audit until January 2009. In future, reports of field visits will be made to Director Generals who will provide the Board with assurance of compliance.
15. **The Board is invited to agree that a risk based audit of compliance with records management policies be instituted and the results be reported back to the Board in January 2009.**

### Policy development

16. In parallel with this work there is also a need for policy development to reduce risks in future. Much of this work, including more rigorous policies effected on the desktop to manage information held in e-mail and shared drives, would fit neatly with the plans for the SPIRE programme which also requires clarity about these things in order to create a specification. Policy changes would need careful consideration and consultation and could be brought back for Board endorsement as necessary at the same time as the consideration of the audit responses.

17. The Board is invited to agree that worked up policy proposals be brought back to the Board in January.

**Summary of actions**

18. The Board is invited to adopt the knowledge and information management principles at Annex C.

19. The Board is invited to agree that a risk based audit of compliance with records management policies be instituted and the results be reported back to the Board in January 2009.

20. The Board is invited to agree that worked up policy proposals be brought back to the Board in January.

**John Pullinger**  
**Director General of Information Services**

May 2008

## ANNEX A

**FINANCIAL DATA RETENTION AND DISPOSAL: POLICY & PRACTICE**

A bicameral policy was agreed in 2003 by both Houses.

**Policy**

2. The policy on data and document retention covers both paper and electronic records.
3. For financial information the House has a general policy of retaining transaction data for 3 years only. Backed up data is available for retrieval for 9 months following the point of disposal from a live system. After 3 years summary data alone is kept to allow trend and other analysis to be prepared. Exceptions to this rule are:
  - Tax payment records are kept for 6 years in the House of Lords (unlike the Commons where the general rule prevails) given they have not sought a dispensation from Revenue and Customs;
  - Advice and correspondence on Member services should be destroyed 5 years after the action has been completed, although the related transaction data should not be retained longer than the general 3 year rule;
  - Tax code change information and records of any overpayments should be retained for 6 years after repayment or write-off because of the Limitations Act 1980;
  - Payroll records are destroyed in accordance with the general rule, although other personnel records may be required to be kept longer depending on the type of information (further details are included in the document retention policy document);
  - Pension records should be retained until an individual reaches their 80<sup>th</sup> birthday (or 5 years after the last action if later);
  - Records associated with any corruption investigation must be kept for 6 years because of the Limitations Act 1980;
  - Contractual and legal action documentation is normally retained beyond the general 3 year rule. The duration of retention will depend on the circumstances;
  - Financial policy papers should be retained for as long as they remain valid and for historical purposes thereafter if deemed desirable. Each set of papers should be considered on its merits;

- Financial procedure documentation should be destroyed 6 years after procedures are superseded.
- Estates project transactional information held on HAIS on the Project, Costing & Billing (PCB) module may be held for more than three years if a project spans more than one year, as the project information should only be destroyed three years after the project is closed.

**Practice**

4. In DR a full time Document Management Officer ensures paper records are actively destroyed in accordance with the rules. Other departments have individuals to co-ordinate the same activity as part of their wider duties.

5. Electronic records on HAIS, with the exception of PCB records, have been cleansed up to and including 2002/03. During the last 12 months attempts were made to cleanse 2003/04, but FOI requirements delayed the exercise being completed. Since 1 April 2008 it is now necessary to also cleanse 2004/05.

6. A further concern has been that other related IT data systems, outside the remit of DR, some of which feed into HAIS, should be cleansed likewise. In summary the current position is as follows:

	Member transactions	Administration transactions	Project, Costing & Billing
<b>(a) Paper</b>			
2002/03	✓	✓	in hand
2003/04	✓	✓	in hand
2004/05	On hold because of FOI requests	in hand	in hand
2005/06	current	current	current
2006/07	current	current	current
2007/08	current	current	current
<b>(b) Electronic</b>			
2000/01	✓	✓	in hand
2001/02	✓	✓	in hand
2002/03	✓	✓	in hand
2003/04	x (due 2007/08)	x (due 2007/08)	x (due 2007/08)
2004/05	x (due 2008/09)	x (due 2008/09)	x (due 2008/09)
2005/06	current	current	current
2006/07	current	current	current
2007/08	current	current	current

**Key:** ✓=destroyed; x=pending destruction

Other financial data may be held on various small systems (eg databases and spreadsheets) which are not reflected in the table above. PICT will have no ownership or visibility of these systems. These will need to be identified and appraised in the data audit proposed in the main paper.

**Further action in hand and planned**

7. Given the need to keep data for current FOI enquiries, together with the difficulty of attempting to partially cleanse a database with an enormous number of individual transactions each year (100,000s), further work is in hand to examine future workable solutions for electronic data. Whatever solution is adopted the annual data management exercise requires a significant amount of work. Thus, for example, the destruction of 2004/05 paper transactional information (other than data which has been asked for under Fol) is in hand, but is not yet complete.

8. A key driver is to ensure the HAIS database is cleansed at the start of each financial year, with agreed sign off that the work has been completed, to avoid the issues that arose last year. This might be achieved by initially downloading data on to a stand-alone disc, thereby getting the information off the main system, with the data identified for retention then being selectively managed down as FOI enquiries and other retention requirements are dealt with. The disc would be destroyed once it was no longer required.

9. Meetings are currently being held between PICT, DR and other interested parties to agree a practical way forward, prior to outstanding electronic data on systems being cleansed as soon as it is practical to do so.

10. DF are reviewing project files held in storage in order to confirm that financial files on projects closed three years ago have been destroyed.



## ANNEX B

**Authorised Records Disposal Practice**

The Parliamentary Records Management Policy<sup>1</sup> states that “records shall be retained only for as long as they are required to support both Houses in meeting their business requirements and legal obligations. At the end of that time, the records will either be destroyed or retained permanently as archives.”

The official policy for the retention and disposal of records, regardless of the format in which they are held, is set out in the Authorised Records Disposal Practice (ARDP). The purpose of the Disposal Practice is to ensure that records are not destroyed arbitrarily and that responsibility for determining when records are disposed of is codified into a policy approved by the Clerk. This meets the requirements set out in the *Code of Practice on the Management of Records under Section 46 of the Freedom of Information Act 2000*.

The retention policy for each type of record has been determined according to its business, legal, evidential and historical value. The general principle is that information should be retained for the minimum period of time consistent with its value to the business. Disposal instructions were determined by staff who participated in the development of the ARDP through consultation, commenting on drafts and involvement in disposal panels; staff continue to provide advice on amendments as appropriate.

The retention periods set out in the ARDP represent a minimum requirement (i.e. records must not be destroyed earlier than the agreed period). Although there will be exceptional circumstances in which records must be retained for longer (e.g. because they are the subject of an ongoing request or complaint under the Freedom of Information Act or the Data Protection Act or are relevant to other potential or actual legal disputes), it is strongly recommended that records are disposed of as close as possible to the agreed disposal period. There are a number of reasons for this:

- it is easier to know with greater certainty what information is held if the ARDP is followed;
- it is easier to pinpoint important information if redundant information has been destroyed/deleted;
- resources (e.g. accommodation, server space) can be used more efficiently (i.e. for information that has continuing value);
- compliance with the fifth data protection principle which states that personal data shall be kept for no longer than necessary; and
- if recorded information exists in any form it is discoverable under the Freedom of Information Act.

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<sup>1</sup><http://pdvnsco.parliament.uk/archives/recordsmanagement/Records%20Management/RECORDS%20MANAGEMENT%20POLICY%20-%20March%202006%20v.1.5.pdf>

The ARDP may be found on the intranet.<sup>2</sup> The policy for expenses and works related information is set out in the Financial Management, Procurement and Asset Management volumes, which are available at:

<http://pdvnsco.parliament.uk/archives/recordsmanagement/disposal/Disposal.htm>

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<sup>2</sup> It is currently comprised of 23 volumes. Pending approval of the Human Resources volume, which combines four volumes into one, the number of volumes will be reduced to 20.

## ANNEX C

**Knowledge and Information Management Principles**

These principles should apply equally to the House of Commons, the House of Lords and PICT and to all information resources which are shared across and between them.

Duties of staff

- i. House of Lords staff members are the trusted custodians of raw data, relevant information and official records<sup>3</sup> which are received, created and disseminated in the course of the House's business. This imposes a duty on staff to use the official systems and channels provided by the House with impartiality and discretion.

Fitness for purpose

- ii. All information resources should be fit for purpose, appropriate to the audience and expressed in a common language based on a shared understanding of their meaning. Information management processes should be flexible and responsive to changes in the internal or external environment.
- iii. Technology should support user and business information management needs not define them.
- iv. Data and information resources should be managed to avoid duplication and overlap and to ensure that there is one single authoritative version.
- v. All information resources should be created, stored and made available in a way which enables them to be shared with those who have a business need to use them.

Compliance

- vi. All information should be created, managed and stored in a way which is secure and consistent with Parliament's legal obligations (e.g. Data Protection, Freedom of Information). Where there is a valid reason to restrict access, this should be managed rigorously.

Official status and House records

- vii. All information handled in the course of official duties should be regarded as a corporate resource rather than a personal asset (even where access is limited to one or to a few users for business or privacy

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<sup>3</sup> The term "information" is used here to mean all three categories except where explicit differentiation is required.

reasons). It should be created and maintained to meet the highest possible standards of accuracy, reliability and timeliness.

- viii. Data and information should be retained for a period consistent with its business value and should be deleted when no longer required. Information should be stored and managed so that material of longer-term value and required to support decision-making or for accountability purposes can be selected and preserved, irrespective of type or format, with its content fixed securely and the corporate business context clear [i.e. as records]

#### Custody

- ix. Each information resource created for official purposes should have one primary custodian. Custodians may delegate day-to-day management and transfer custody if clear and auditable procedures are followed.

## ANNEX D

**A Digital Preservation Strategy for Parliament****1. Recommendations**

The Management Board is asked to:

- Endorse the need for a Digital Preservation Strategy, as outlined below.
- Note the strategic vision and aims at paragraphs 4 to 5.
- Note the activities and likely expenditure outlined on the accompanying Roadmap.

**2. Introduction**

For over 500 years Parliament has managed its information in various analogue (ie hard-copy) formats, including parchment, paper, videotape and photographic film. It now needs to address the challenge of preserving Parliament's digital resources for the same length of time. Without access to the trusted digital information it needs to preserve (up to and including in perpetuity) neither House will be able to support the work of its members or its administration, nor the requirements of the public for access to Parliamentary information wherever and whenever they want it in the future.

A small quantity of Parliamentary data requiring long-term or permanent preservation has already been lost, and a further 50 terabytes (50 million megabytes) are currently estimated to be in need of urgent attention.

A strategy and high-level business case has been created to manage that risk up to 2012. It has been developed by the Parliamentary Archives, in consultation with key stakeholders in both Houses and PICT. The strategy is based on a hard-nosed business impact appraisal, where professional best practice in information and archive management supports rather than directs investment. This memorandum is a summary version of the Digital Preservation Strategy and Roadmap which has been approved by the Directors of Information Services of both Houses.

The expected order of investment over 4 years is £1.26m, as follows: 2008/9: £60K; 2009/10: £155K; 2010/11: £395K; 2011/12: £645K. It is anticipated that the technology costs will be a matter for the standard JBSB and finance officer authorisation processes - that is, initially as part of a high-level four year programme including other information and knowledge management priorities, followed by more specific business cases.

**3. What is Digital Preservation?**

Digital Preservation is the process of ensuring that a digital resource remains authentic and accessible over time, despite changes to, and obsolescence of, the hardware and software which makes it readable. The challenges of maintaining access to digital resources (digital records, digitised images,

digital photos, webpages, datasets, audio-visual feed, podcasts, virtual tours, blogs etc) in the long term are related to notable differences between digital and analogue material, namely:

- **Machine Dependency** - digital resources all require specific hardware and software in order to access them.
- **Technological Obsolescence** - the speed of changes to software, hardware and operating systems means that the timeframe during which action must be taken is very much shorter than for paper. These may be measured in terms of perhaps only two to five years, as opposed to the decades or even centuries we associate with the preservation of traditional materials.
- **Loss of Integrity** - the ease with which changes can be made to a digital resource and the need to make some changes in order to manage the material means that there are challenges associated with ensuring its continued integrity, authenticity, and history.
- **Fragility of Carrier Media** - the media on which digital materials are stored (such as CDs, DVDs, and digital tape) are inherently unstable and without suitable storage conditions and management can deteriorate very quickly even though they may not appear to be damaged externally.
- **Passive Preservation is Not an Option** - allocating a priority to the preservation of digital resources is much more urgent than for paper archives.
- **Preservation Action is Needed Prior to Creation** – a continual programme of active management is needed from the design and creation stage of a system onwards, if preservation of that system's digital resources is to be successful.

#### 4. Alignment with Corporate Plans and Strategic Fit

The Strategic Plans for the administrations of both Houses provide the business context for a digital preservation strategy in the areas of:

- Promoting public knowledge and understanding of the work of both Houses (Commons primary objective 3; Lords core task 3)
- Effective information management to support the work of the administrations and provision of ready access to it by the public (Commons' supporting task v; Lords' supporting objective 7)
- Maintenance of the integrity of Parliament's heritage collections (Commons' supporting task iv; Lords' core task 4) and
- Effective corporate governance and risk management (Commons supporting task iii; Lords' supporting objective 6).

Development of a bicameral corporate strategy for digital preservation will enable both Houses to deliver these strategic goals as they relate to the longevity of Parliament's digital information.

#### 5. Alignment with Other Strategies and Activities

The strategy relates to other key initiatives in the following ways:

- **I/KM Strategy** – the Digital Preservation Strategy is a sub-strategy of the Information and Knowledge Management Strategy being developed by the Information Services Directorates of both Houses.
- **IT Strategy** – the PICT IT strategy complements the I/KM Strategy. Digital Preservation appears on the IT Strategy roadmap in the Application Routemap under critical business systems, but there are also synergies with the Infrastructure Routemap under servers and hosting. Ultimately the data and storage strategies are also affected by digital preservation issues.
- **Parliamentary Archives' Aims and Objectives** - The Archives' mission is to safeguard the records of Parliament throughout their lifecycle - that is, from their creation or receipt to their destruction or archiving - and to maintain their accessibility thereafter, *no matter what their format*, so it is an excellent fit with this strategy. However, this strategy includes not just digital records, but other digital resources as well.
- **SPIRE** – the archival outputs from any Electronic Document and Records Management System which are identified as digital archives will require preservation along with the other digital resources created by Parliament.

## 6. Strategic Vision

That Parliament's digital resources will remain authentic and accessible in the future to anyone who needs them, despite the inevitable changes to their hardware and software environment.

## 7. Strategic Aims and Benefits

An extensive business justification can be found in the full strategic document. In summary, this strategy will:

- ensure that the long-term digital memory of Parliament is not lost or inaccessible, or compromised in any way which could damage either House's ability to do its work, or its reputation.
- enable Parliament's mission to offer permanent public access to its online resources, for leisure, educational, academic or business use, and to support democratic accountability.
- prevent wasted expenditure on digitisation and other projects for online public access, by supporting a "create once: use many times" environment for digital assets of long-term importance.
- avoid nugatory expenditure on corporate systems whose digital content cannot be extracted and/or preserved for future use.
- provide a generic long-term preservation environment for Parliament's digital resources, reducing the need for multiple current systems to offer this requirement at additional cost and risk to those systems.
- introduce best practice in digital preservation within Parliament.

- contribute to wider digital preservation developments outside Parliament through sharing experiences, collaborating with suitable partners and influencing technological developments of direct or indirect benefit to Parliament.

## 8. Strategic Activities

The aims of this strategy will be realised by undertaking seven areas of activity concerned with: the information environment, policy, preservation, presentation, standards, skills, and communications. To reduce risk, build expertise, and cost activities increasingly accurately, an incremental but very practical approach to digital preservation is being proposed.

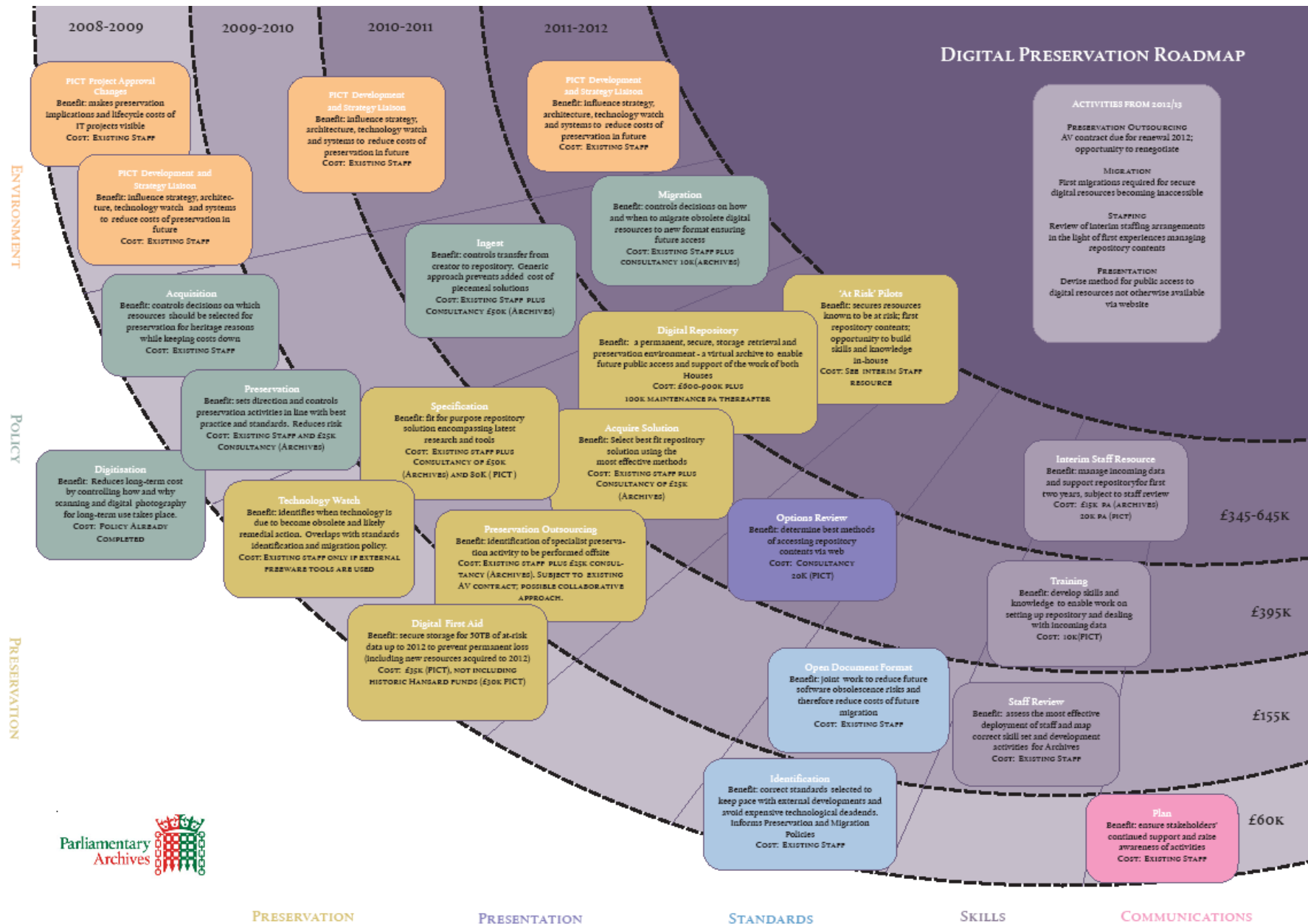
- **Information Environment** – this workstream will seek to influence decisions on the enterprise architecture and IT strategy which have a digital preservation impact, and will identify areas where planning for digital preservation needs to be embedded in Parliamentary systems and content, particularly within the PICT programme.
- **Policy** – this workstream will provide the policy framework within which Parliament's digital preservation activities will take place
- **Preservation** – this workstream will undertake the actual preservation actions required, and will be the largest area of activity. It will involve the identification of short- (up to 5 years) and medium-term (5-10 years) solutions for the range of digital resources requiring preservation, including the formulation, and management, of individual projects.
- **Presentation** – this workstream will be dedicated to devising methods by which the public and staff can access preserved digital resources in a secure and efficient manner. Options will be considered in the light of wider website developments.
- **Standards** – this workstream will identify, assess and implement the necessary standards required for the full range of digital preservation activities, working with existing areas of expertise inside Parliament and developing others.
- **Skills** – this workstream will identify and develop the skills and competencies required by Parliament to undertake digital preservation activities in the future
- **Communications** – this workstream will target effective communications about digital preservation in Parliament.

## 9. Further Information

A copy of the full strategy is available from [archives@parliament.uk](mailto:archives@parliament.uk).

**Digital Preservation Working Group  
13 May 2008**





\*EXISTING STAFF\* INCLUDES THE DIGITAL RECORDS SPECIALIST IN THE PARLIAMENTARY ARCHIVES