

MANAGEMENT BOARD**RECORDS MANAGEMENT COMPLIANCE AUDIT:
FINAL REPORT**

Paper from the Director General of Information Services

Purpose

1. This paper summarises the overall findings and recommendations of the Records Management Compliance Audit carried out by the Records Management Team of the Parliamentary Archives across Departments of the House of Commons from October 2008 to June 2009.

Conclusions and decisions

2. The Board is invited to:
- a. note the overall findings and risk issues raised following completion of the audit in the House of Commons and PICT;
 - b. note the findings of the audit carried out in PICT, and the recommendations made and management response given (see **Annex A**, pages 8-13); and
 - c. approve that a follow-up 'health check' to the audit is carried out in April 2010.

Consultation

3. This paper was circulated to the Audit Steering Group¹ and reflects their comments.

Background

4. 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, including any significant risks or exposures. The aim of the audit 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.

5. Findings and recommendations for the Departments of Resources, Facilities, Chamber and Committee Services and Information Services were submitted to the Management Board in February and May 2009. PICT was the final Department to be audited. A statement of compliance and summary of recommendations for PICT is given in **Annex A**, pages 8 – 13.

6. The audit focused on the management of records² exclusively; it required departments to consider the management of records held electronically (in network drives, e-mail folders, databases, strategic corporate systems, as well as on laptops and portable

¹ Members of the Audit Steering Group were John Pullinger (Chair), Bob Castle (Information Risk and Information Security), Liz Hallam-Smith (DIS, House of Lords), Joan Miller (PICT), and Helen Wood (SPIRE).

² Records are defined in the Parliamentary Records Management Policy (2006) as: "...information, irrespective of format or the media on which it is held, created, received and maintained as evidence and information by both Houses, in the transaction of business or in pursuance of legal obligations."

storage devices used to facilitate remote and home working) and hard copy records (including the use of the off-site storage facility, currently under contract to Iron Mountain) against seven key records management risks (see box below). Particular attention was also given to the authorised disposal (i.e. destruction or transfer to the Parliamentary Archives) of records held in all formats.

7. The audit approach was collaborative, with departmental Records Champions, supported by the Records Management Team, completing a departmental self-assessment³. A combination of questionnaires and interviews with selected staff were the main method used by Records Champions to determine compliance with records management policy across their department. This was supplemented by knowledge of departmental and section level practices gained by the Records Management Team over a number of years. Supporting documentation was also required to substantiate claims made in the audit submissions. Due to the constraints of time and resources placed on the audit, submissions generally indicated high level practices across departments, and detailed testing of records management practices at operational levels was not always possible. All findings reported are stated in 'good faith', and relate directly to the quality of the audit submissions.

Overall assessment of compliance

8. In the opinion of the Records Management Team, most of the departments understood the need to comply with corporate policy and procedures. A small number of individual sections/offices were considered to have implemented competently-managed and well-controlled local records management practices, with no particular issues arising. However, the majority fall below an acceptable level of assurance and/or also have specific issues that need to be addressed, in some cases as a matter of priority. Some significant shortcomings and weaknesses in the implementation of records management policy across the House were identified during the audit, and therefore full assurance on the adequacy of established practices and procedures to mitigate risks cannot be given. It should be noted that some departments were already making efforts, or initiatives were in place, to address some of the issues identified during the audit.

9. 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 complying at Level 3, while some departments comply partially with Level 4 (see box below).

10. The Records Management Team recognises that the size, number of discrete offices and diverse range of services provided by the departments, coupled with the limitations of current technology made available to staff to manage electronic records, present a number of challenges to achieving unified and consistent management of records in all formats across the House.

11. **PICT is partially meeting the basic requirements for records management as set out by Level 2 in this audit, with some examples of individual team compliance at Levels 3 and 4.** There is evidence that HR Operations, Business Management, Finance and teams handling higher risk information (such as sensitive or personal data, procurement and financial records) generally have much higher levels of compliance than other areas. It should be noted that levels of compliance relating to the day-to-day creation and management of records and information are significantly higher than those which focus on the disposal of materials, both in hard-copy and electronic format. However, levels of

³ The Audit Toolkit, used by departments to gather evidence, is structured to make a realistic determination of a department's existing level of records management achievement with regard to skill levels, procedures, systems and processes. A copy of the Toolkit is available upon request.

compliance vary widely within the department, as does the consistency of implementation and enforcement of records management policy, most notably in the requirement to print all *substantive* records to paper, and in the disposal of electronic information.

Summary of findings

12. A wide number of issues were raised during the audit. Although a number of these can be solved at individual office or department level, some require unified working across the House to achieve the necessary outcome (i.e. the effective management of electronic records). In summary, the following issues were highlighted in the audit:

- Broadly, departments show a strong appreciation of the need to manage records in line with policy to support day-to-day business activities, wider corporate governance and public accountability. However, although managers tend to appreciate the strategic risks associated with the mismanagement of records and information, when prioritised against a department's core activities records management is generally not a priority area for action. Additionally, the audit showed that knowledge and understanding of individual records management responsibilities and the scope of the records management policy (e.g. that it applies to *all* records created and received in the course of work, including those held electronically) has led to significant inconsistencies in the effective day-to-day management of records and the implementation of robust procedures. Records management is often perceived as a task additional to a department's core activities, delegated to designated members of staff only.
- 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.
- The current policy requirement that all *substantive* records must be printed and filed is becoming increasingly difficult to enforce, with staff eager to exploit new technologies to manage records and support day-to-day working practices. Audit submissions illustrated frustration with the 'print to paper' policy, with evidence showing that staff increasingly feeling this is an unrealistic requirement given current working practices, and lack of storage space for hard copy records in some areas⁴.
- As was expected, the audit highlighted that there is generally poor management and lack of control of unstructured records held electronically on network and personal drives and in Outlook accounts. While the suite of office tools (such as e-mail, word-processing, spreadsheets etc) provide features which allow users to create, file, store and retrieve records they do not provide the functionality to provide for the administration of these records through their lifecycles, from creation to disposal. Additionally, responsibilities at local levels for the management of electronic records are generally not assigned, and consequently the House has accumulated a vast amount of unstructured electronic information, which is not filed, classified or disposed of in accordance with policy.

⁴ The 'print-to-paper policy' is necessary under current arrangements because the technology available to staff at present cannot ensure records are what they purport to be (i.e. copies of records held on network drives can be overwritten easily, lost or become inaccessible through technology changes). The SPIRE programme, supported by the Records Management Team, is looking into options for improving the management of records held electronically.

- Although most staff are aware that there is a policy relating to the disposal of records, evidence shows that instructions are not consistently implemented. This is particularly evident in the area of electronic copies of records and emails held in Outlook accounts and on network drives (see above). Evidence gathered also indicates that procedures for the systematic disposal of data held in structured systems and databases are generally lacking, and there is some confusion among database owners in the departments about where responsibilities for ensuring this is undertaken lie. Consequently, information in these systems may be held indefinitely, even where it should be deleted in accordance with policy or has become obsolete. Although PICT can provide support for the maintenance of systems, they do not own the data held within it and can only assist with its destruction if authorised to do so.
- Requirements for the management and/or return of records created by, or made available to, contractors or consultants in the course of work undertaken for the departments are not always explicit in contracts. Clarifying ownership and practices to be adhered to will help to ensure that records are not lost once a contract ends, held indefinitely outside of the House, or indiscriminately disclosed by a third party.

13. Many of the issues raised above are not unique to the House of Commons, but are challenges faced by all organisations in managing their records and information, particularly those created and held in electronic form.

Risk issues raised

14. The completion of the final tranche of the audit reinforces a number of existing concerns that are relevant across the House administration. The audit findings and recommendations link in closely with work being undertaken in the areas of information risk and information security, and by the SPIRE programme.

15. The findings of this audit are of some concern, particularly in relation to non-compliance with records disposal policy. In the current business environment, with its prevalence of electronic documents and e-mail messages, existing practices are putting the departments, and the House, at risk due to inadequate practices surrounding records retention and statutory and regulatory compliance. Failure to manage records effectively may mean staff cannot promptly access complete, authoritative and up-to-date records. The risks incurred from the failure to effectively manage key records series⁵ extend beyond individual departments to all areas of parliamentary business. This poses both a reputational risk to the House and puts the House at risk of not being able to fulfil its legal and statutory obligations.

16. Additionally, the Records Management Team has residual concerns about the management and disposal of information held in strategic systems and databases across the House administration in line with records management policy. Although a key focus of the audit, there were significant gaps in the evidence supplied relating to this area. These issues therefore require further investigation by the departments, PICT and the Parliamentary Archives.

⁵ This includes, but is not limited to, records relating to the provision of services to Members, the ongoing provision and support of ICT services which support and enable the work of both Houses of Parliament, House-wide policy directives that ensure the House can meet its obligations towards employees and others, 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.

RISKS TO THE MANAGEMENT OF HOUSE RECORDS

1. The House cannot identify, with reasonable authority, what information it holds, where it is located and who is responsible for its management through the failure of staff to comply with records management policy and practice.
2. House staff cannot be certain they are retrieving the authoritative version of a record because multiple copies of documents and records are stored in different locations, without a standard form of version control, and superseded versions are never disposed of as per policy.
3. The House risks inappropriate disclosure of records containing sensitive information because some records sent to off-site storage are identifiable (i.e. not anonymised) and procedures for ensuring their timely destruction are not followed owing to the provision of poor guidance by the contract managers and failure of staff to comply with what guidance is provided.
4. The House fails to protect personal data which is held insecurely off the Estate in laptops, home computers and portable storage media through the failure to apply records management policy and practice across all parliamentary records, regardless of media or where the information is held.
5. The House runs the risk that important records are lost or cannot be found because they are not properly safeguarded and managed.
6. The House holds records longer than required through failure to comply with the Authorised Records Disposal Practice, the House's approved policy for records retention.
7. The House runs a reputational risk when records are disposed of arbitrarily and without the proper authority through the failure of staff to comply with the Authorised Records Disposal Practice.

Conclusions

16. The audit confirmed that records management is often perceived as a low priority. Although all departments recognise that greater attention needs to be given to this area, staff highlighted that they are currently faced with competing priorities relating to various current initiatives on records and information management (e.g. records management audit, SPIRE, information risk and security, desktop upgrade etc) and would welcome greater clarification on the objectives and interdependencies between the initiatives.

17. Recommendations made to each department provide the framework for sustainable improvement in their levels of records management compliance. However, it is necessary to agree a means to ensure departments are held accountable for compliance with policy if improvements made in the light of this audit are to be sustainable over time.

The Board is invited to approve a 'records management health-check' in April 2010, to assess progress against audit recommendations.

18. The audit has raised awareness of the records management programme across all offices and departments. The audit approach, by which departments were required to undertake a self-assessment of their current records management practices, gave departments greater ownership of and insight into the issues raised by the audit. Management responses generally showed departments are keen to address issues and improve practices. The audit findings have also been used by the Records Management Team to identify areas where additional training or guidance is required.

Annex A – PICT Statement of Compliance and Management Response

1. In the Records Management Team's opinion, **PICT is partially meeting the basic requirements for records management as set out by Level 2 in this audit, with some examples of individual team compliance at Levels 3 and 4.** The department places a high value on access to and retrieval of information required to support its core operations and, in a few areas, has embedded good practice into day-to-day working. There is evidence that HR Operations, Business Management, Finance and teams handling higher risk information (such as sensitive or personal data, procurement and financial records) generally have much higher levels of compliance than other areas. It should be noted that levels of compliance relating to the day-to-day creation and management of records and information are significantly higher than those which focus on the disposal of materials, both in hard-copy and electronic format. However, levels of compliance vary widely within the department as does the consistency of implementation and enforcement of records management policy, most notably in the requirement to print all *substantive* records to paper, and in the disposal of electronic information.
2. The department needs to ensure that effective records management practices and procedures, already implemented in some areas of the department, are rolled out to all those areas creating and managing records, even where these may be of short- or medium-term value. Awareness by all staff of their individual records management responsibilities needs to be achieved.
3. Three high priority issues with recommendations have been identified as a result of the review (see table below). A further two medium and three low 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 Three, and to progress towards compliance with Level Four.
4. The management response received from PICT takes on board the risks raised by the report, and provides a practical response to all recommendations made. The management response highlights that particular recommendations present certain challenges to the department and may be difficult for it to implement (particularly the policy requirement to print all substantive records).

To: Parliamentary Archives

From: Joan Miller, Director of PICT
Elizabeth Honer, Director of Resources, PICT

Date 23 June 2009

Records Management Compliance Audit: PICT - management response

Our detailed management response to the audit has been added to the list of recommendations at the end of the report. This cover note makes some observations on the report and provides a summary of the management response.

Observations on the report

The report provides a helpful analysis of the progress made by PICT in managing its records effectively and of the areas where it needs to do more. A particular theme running through the report relates to electronic versus paper records management, and lack of adherence to the print-to-paper policy. Given the nature of PICT's work, with its emphasis on electronic media rather than paper, and the constraints on file storage space within the department, this is perhaps not surprising. The print-to-paper policy presents a particular challenge for PICT and is perhaps unrealistic.. It is worth emphasising, as the report notes, that essential records are nevertheless held, for example the documentation needed to support ICT systems across Parliament, just not in paper form. The report also acknowledges that PICT has in its first years paid greater attention to records creation rather than disposal, and we accept that we now need to ensure we have the necessary disposal processes in place.

Summary of management response

Overall we accept the comments and recommendations, and thank the records office for its fair presentation of PICT's progress. We will ensure further action is taken to make staff and managers aware of their responsibilities and that good practices are embedded. In particular, steps are already in hand to improve the management of records relating to projects and programmes.

Set against that, is the need for balance and realism. As you will see from the detailed response, we will need to agree how best to provide additional training and engagement without compromising service and project delivery in such a busy year. We would welcome advice about how best to achieve that. Most of the timescales have therefore been marked as "to be confirmed", until further discussions have been held.

HIGH PRIORITY RECOMMENDATIONS

Ref.	Issue	Risk	Recommendations	Management Response / Action Plan
1	Managers may be unaware of their responsibilities under the <i>Parliamentary Records Management Policy</i> to ensure implementation and compliance with policy requirements in their area of responsibility.	1-7	Require managers where appropriate to undertake relevant training over a period of time to be agreed with the Records Management Team (RMT). <i>N.B. This may take the form of a tailored refresher seminar, run jointly by staff of the RMT and PICT, which addresses issues specific to the department.</i>	Agree Proposed Action: Discuss nature of training and timing with records office. Focus on areas needing most improvement AND of highest risk. Person responsible: Joe Connolly with HR&Development, and records office. Timescale for completion: tbc
2	Staff in some teams are unaware of their individual responsibilities in relation to the practical, day-to-day implementation of records management procedures.	1-7	Departmental induction processes to include introduction to local records management procedures, including those for electronic records and e-mails, for all relevant staff.	Disagree: records management is already covered in Commons House-wide induction, which PICT staff attend, and not good use of time to repeat this at departmental induction. Need to balance against increasing number of requirements that should be covered at time of induction e.g. ICT/data security. But, willing to consider alternative ways of getting message embedded e.g. include records management guidance on new induction webpage, or ask HR or manager to go through guidance with member of staff on first day Proposed Action: To consider alternative methods of embedding good practice. Person responsible: HR&Development team

				<p>with Joe Connolly.</p> <p>Timescale for completion: tbc</p>
			<p>Records management procedures to be embedded in relevant procedures manuals / desk notes.</p>	<p>Agree but not as urgent as training and doing.</p> <p>Proposed Action: review current documents for gaps and agree timetable for revisions to existing documents.</p> <p>Person responsible: Joe Connolly.</p> <p>Timescale for completion: by end March 2010 for updating existing documents.</p>
			<p>Programme and project management methodologies to include references to procedures for managing and disposing of records of these activities in line with policy.</p>	<p>Agree and in hand.</p> <p>Proposed Action: Programme Office already developing procedures to increase records disciplines: file structure and document configuration in use, to be reviewed after first six months of use. All templates held centrally by PMO and register held of all approved programme/ project documents and Document Control spreadsheet also in place.</p> <p>Person responsible: Rose Lenihan, Head of Programme Management Office</p> <p>Timescale for completion: Processes currently being defined in writing and to be in place by end of second quarter.</p>

		<p>Consider establishing a ‘tree structure’ underneath the Records Management Officer, with each section in the department appointing local records administrators to serve as the Record Officer’s liaison for that area.</p>	<p>Agree</p> <p>Proposed Action: To consider recommendation, including how other departments/offices are doing this e.g. Dept of Resources has new internal group to cover full range records and data responsibilities.</p> <p>Person responsible: Elizabeth Honer, Director of Resources</p> <p>Timescale for completion: To review develop proposal by end August 2009.</p>
		<p>Where appropriate, references to specific records management responsibilities to be included in forward job plans, and review these activities in annual staff reports.</p>	<p>Disagree – FJPs no longer exist in same way in Commons/PICT as in the past. New PDMs focus more on specific shorter term deliverables rather than ongoing responsibilities. More appropriate for job descriptions. Will consider alternatives to get message across.</p> <p>Proposed Action:</p> <p>Person responsible:</p> <p>Timescale for completion:</p>
		<p>Ensure that contractors are made aware of the requirement to transfer custody of parliamentary records created in the course of their work to the department upon completion of a project, in addition to existing</p>	<p>Already in place</p> <p>Proposed Action: Current standard clauses in contracts cover this already (Clause B9 IPR). Manager responsible for contract to draw to</p>

			confidentiality clauses in contracts.	attention of contractor. Person responsible: Andy McHattie, PICT Business Manager Timescale for completion: Already in place
3	Some staff are either unaware of or choose to ignore the policy of printing substantive master records to paper and filing them in accordance with records management procedures.	1, 2, 5	Procedures to include reference to requirements to print electronic records to paper as appropriate and file them in accordance with records management procedures. <i>N.B. If the department has concerns over implementing this aspect of policy (ie due to lack of storage space for hard-copy records) the Parliamentary Archives should be contacted for advice on resolving these issues.</i>	Agree / Disagree (see note below) Proposed Action: Person responsible: Timescale for completion: <i>NOTE: Need to discuss practicality with records office – see covering note.</i>
			Records of the Infrastructure programme board should be printed, filed in file covers and recorded on the file list.	Agree / Disagree (see note below) Proposed Action: Person responsible: Timescale for completion: <i>NOTE: Need to discuss practicality with records office – see covering note.</i>

		<p>Procedures to be put in place to ensure regular spot-checks are carried out across all relevant sections to ascertain whether substantive hard-copy records are filed in accordance with procedures and information recorded appropriately.</p>	<p>Agree / Disagree (see note below)</p> <p>Proposed Action:</p> <p>Person responsible:</p> <p>Timescale for completion:</p> <p><i>NOTE: Dependent on answer to two above items.</i></p>
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