MANAGEMENT BOARD

RECORDS MANAGEMENT COMPLIANCE AUDIT:
TRANCHE I - DEPARTMENTS OF FACILITIES AND RESOURCES

Paper from the Director General of Information Services

Purpose

1.   This paper reports the findings, recommendations and management responses for the first tranche of the Records Management Compliance Audit carried out in the Departments of Facilities and Resources from 7 October to 12 December 2008, by the Records Management Team of the Parliamentary Archives. Emerging policy issues that relate to gaps in the existing policy framework and to the management of parliamentary records and information are also discussed.

Conclusions and decisions

2.   The Board is invited to:

   a. note the findings of the audits carried out in the two departments (paragraphs 8 and 9):

   b. note the recommendations made and the management responses given (see paragraphs 10 to 14 and **Annexes A** and **B**);

   c. note the policy gaps emerging (paragraphs 15 to 18); and

   d. agree the next steps to be taken (paragraphs 19 and 20).

Background

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

   • improve the consistency of the administration's responses to Freedom of Information (FOI) and Environment Information Regulations (EIR) requests and PQs, as well as compliance with Data Protection principles;

   • draw attention to any issues relating to data security; and

   • reduce the cost to the House services of the storage of data, by removing unnecessary documents, records and data from electronic and hard-copy systems.

4.   The review has been designed to be "risk-based" and has started with the Departments of Resources and Facilities which were identified as being the most vulnerable. These Departments are subject to a greater volume of audit investigations, as well as Freedom of Information requests, and hold the largest volume of records that need to be managed and will ultimately be destroyed in line with the requirements of the National Audit Office, contractual obligations, legislation and regulations. These departments also hold key records series that relate to Members' use of parliamentary services and facilities (e.g. expenses, functions, accommodation).

5.   The audit focuses on the management of records[1] exclusively; it requires 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 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)

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 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 poor guidance provided by the contract managers and failure of staff to comply with these procedures.

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*.

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[1] 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."

6.   Audit findings rely on a departmental self assessment. [2] The Records Management Team's determinations in the audit reports, summarised here, were made on the basis of the evidence submitted, combined with existing knowledge and experience of record keeping in the departments, as a result of previous field visits and other support given.   A summary of the findings of both Audits and an analysis of risks identified is in **Annex C**.

LEVELS OF RECORDS MANAGEMENT COMPLIANCE

Level 1: establishes whether there is a broad understanding of what records the department should hold, whether it in fact holds them, where they are held and whether they are easily accessible, as well as whether there is understanding among staff that not all records can or should be retained indefinitely.

Level 2: establishes whether staff are aware of the policies and programmes in place in Parliament to manage records/documents/data, including the *Authorised Records Disposal Practice* (ARDP).

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

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

Level 5: demonstrates sustainability (i.e. that a department has implemented consistently records management policy and practice and strives continually to improve the management of its information; records management is integral to the business); this includes the department having implemented consistently the ARDP – taking account of disposal requirements in the development of new systems (manual or electronic and/or in the evolution of business processes).

Statements of compliance

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

8.   In the Team's opinion, **the Department of Facilities does not meet the basic requirements for records management as set out in the *Parliamentary Records Management Policy* (April 2006), apart from the Finance and Human Resources Offices and parts of the Catering & Retail services that handle finances**.   Although compliance is poor across the department, Estates, in particular, fails to meet requirements at any level and will need the greatest investment of resources to address issues raised. The Accommodation and Human Resources directorates, and the Human Resources section of Catering and Retail comply generally with Levels 1 and 2, and the Finance directorate provides evidence that demonstrates it is largely compliant with Levels 1, 2 and 3. However Finance is assuming that, for example, materials sent to off-site storage are being disposed of as per policy; Finance relies on another office in Facilities to transfer and manage material sent to Iron Mountain. Estates Sustainability indicates compliance at Levels 1 and 2, yet no evidence was submitted to support compliance and the response to

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[2] 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. The process of moving up the levels is incremental; each level and its activities lead on to the next level. The levels create the infrastructure for sustainable improvement. A copy of the Toolkit is available upon request.

follow-up by the Records Management Team indicates that these claims are based on an individual's memory and experience only of using the filing systems in place.

9.   **The Department of Resources meets the basic requirements for records management as covered by Levels 1 and 2 in this audit. It is also partially achieving Level 3.** The department has implemented broadly the key features of the records management programme and, in some areas, has embedded good practice into day-to-day working practices. However, levels of compliance still vary widely across the department and there are some significant weaknesses in the implementation and enforcement of records management policy. This is particularly evident in the management of electronic information and the disposal of all records, which can result in the House being unable to meet fully its legal obligations. The audit findings demonstrate that procedures for managing records of Members Expenses by the Department comply with records management policy. Procedures have now been put in place to ensure the timely and authorised disposal of both hard copy records and financial data held electronically in HAIS and, at the time of the audit, a review of controls over access permissions to financial data held in HAIS was in its final stages.

Recommendations and Management Response

10.   It has to be recognised that both departments have been under significant operational pressure and, especially within the Department of Facilities, are currently undergoing a major transformation following the "Tebbit" review. Dealing with legacy issues in relation to records management needs to be seen in the context of the overall management of those departments. The recommendations and management responses provide a realistic risk base response. The records management 'culture' should evolve to close the gap caused by embedded personal work habits and/or directorate/section silos to deliver a successful department-wide records management programme. Eliminating this gap can be accomplished by creating an understanding and awareness among all staff, training and implementing enabling technologies in future so staff will be motivated to undertake new practices in compliance with policy and procedures. In particular, staff at senior and middle management levels will have to demonstrate their commitment to these practices on a regular basis, and embed them into the everyday culture of their departments and teams, supporting and backing up those junior staff acting as record officers who may not have the power to implement what is required in certain circumstances. This will take time.

11.   For the Department of Facilities, eight high priority issues with recommendations have been identified as a result of the review; these are listed in **Annex A**.   A further five medium and three lower priority recommendations have also been made and are available upon request. The aim of these recommendations is to bring the department's compliance with records management policy and practice to Level Three minimally; once achieved, additional monitoring and recommendations will be required to move the department on to Level 4 and eventually Level 5.

12.   The management response received from the Department of Facilities takes on board the risks raised and provides a practical reply to the recommendations made. A 2.5 to 3-year programme of work is necessary in order to achieve full compliance to Level 3. The Records Management Team and departmental records champion will monitor progress against an agreed action plan.

13.   For the Department of Resources, five high priority issues with recommendations have been identified as a result of the review; these are listed in **Annex B** (pg. 13).   A further five medium and one lower priority recommendations have also been made and are

available upon request. The aim of these recommendations is to bring compliance with records management policy and practice to Levels 3 and 4 across the entire department.

14.   The management response received from the Department of Resources also takes on board the risks raised in the report and provides a practical scheme of work to address all recommendations made. A 1.5 to 2-year programme will allow the department to achieve full compliance with Levels 3 and 4, and be moving towards compliance at Level 5. The Records Management Team will meet with the steering group established by the department to co-ordinate actions required to address the report's recommendations.

Policy Development

15.   The audit raises a number of policy related issues. In particular, there is a clear desire among staff to work and manage their information electronically; the rise of Web 2.0 (e.g. web-based e-mail and office product suites, blogs, wikis, social networking, etc) and Enterprise 2.0 technologies will only strengthen this desire. Prohibition of these technologies is not realistic. Instead it will become increasingly important to address solutions through policies governing use. A good current example of this is the instant messaging pilot that has recently commenced.

16.   The *Parliamentary Records Management Policy* (2006) already addresses some issues arising. For example, it makes clear that e-mail is a record and must be managed in accordance with all parliamentary records. The *House of Commons' Staff Handbook* also addresses issues relating to communications in Chapter 7, including use of the Parliamentary Network (e.g. passwords, prevention of unauthorised access, data storage and disposal, etc.) and e-mail and Internet use.

17.   However, as staff use of emerging technologies increases, relevant management structures, the Human Resources Directorate in Resources, PICT, Commons' Department of Information Services and the Parliamentary Archives with other bodies, including SPIRE and IRIS, will need to consider the following: which technologies should staff be allowed access to; how they should be supported; and what types of records and information can be published and under what conditions can these technologies be deployed? Consideration of these questions will lead to the need for new policies governing the use of new and emerging technologies.

18.   Other policy issues that require consideration include the benefits and risks of e-mail archiving, use of digital signatures and encryption (electronic authorisation and authentication), as well as corporate approaches to various practices that might include naming conventions, version control conventions and use of personal versus shared drives.

Audit – Next Steps

19.   The Records Management Compliance Audit commenced in the Departments of Chamber and Committee Services and Information Services on 12 January 2009. I will update the Board (with a Take Note paper) in April 2009. The audit of PICT will commence in April 2009 and the final report on the Audits across the House of Commons and PICT will be submitted to the Management Board in July 2009.

20.   The first tranche of the Audit reinforces a number of existing concerns that are relevant across all Commons departments and might be appropriate for discussion by the Management Board in future; these include:

- Information management is a strategic risk. *The Management Board has already recognised this in the corporate risk register and it will, therefore, be reported upon systematically in future*

- Paragraphs 15-18 on policy gaps point to the need – envisaged for some years but not yet implemented – for a bicameral corporate information management policy, underneath which a number of existing 'sub-policies' relating to the use of Parliamentary information, including records management, would easily fit.[3] *I will take this forward.*

- There is a need for robust, yet appropriate, methods for managing parliamentary records electronically for current use. Simply providing better storage for electronic records in the form of a document management system is not sufficient; technologies are required that can ensure the authenticity of records and enforce disposal instructions and department and House-wide requirements for retrieval and use. In the meantime, although unpopular, the print-to-paper policy remains necessary because the technologies available are not designed to accommodate and enforce disposal instructions or department and House-wide requirements for retrieval and use.[4] *I will work with the SPIRE project to ensure this is addressed in the forthcoming business case.*

- There is a need for stronger controls on the use of off-site storage.   It is unknown how many boxes Iron Mountain is storing for the House administrations which have passed their assigned review/destruction date, and as a result it is highly likely that a large number of records which should have been destroyed according to policy are living on in storage indefinitely.[5] A significant amount of materials have been sent off-site without a destruction or review date[6], and in some cases records of long-term historical value, as well as records relating to the fabric of the Parliamentary Estate, have been among these transfers. A high turnover of staff has resulted in individuals using the facility who are untrained and unsure of the guidance and procedures to follow. Departments are currently responsible for keeping track of all boxes in storage that have reached their destruction or review date, and contacting the Iron Mountain storage facility to instigate destruction of records as appropriate; there is no consistency in staff awareness of this responsibility. However, it is normal practice for file storage contractors to be responsible for instigating this process (although no destruction should occur without the client's authorisation) thus saving the client's time. *The Records Management Team (Parliamentary Archives) will raise issues identified in the Audit with Facilities (Estates) and brief me as appropriate.*

- Supporting the need for the ownership of records, and thus the responsibility for managing them in accordance with policy, and returning records upon completion of work undertaken, to be made explicit in the contracts of consultants and contractors. Clarifying ownership and practices to be adhered to will help to ensure that records are not held indefinitely elsewhere or are indiscriminately disclosed by a third party. *The Records Management Team (Parliamentary Archives) will raise issues identified in the Audit with Resources (Procurement) and brief me as appropriate.*

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[3] Examples of non-records management 'sub-policies' which would fit under the umbrella of an bicameral information management policy could include copyright, descriptive cataloguing standards, identity management and digital preservation.
[4] The SPIRE programme is considering options for improving the management of records held electronically.
[5] Iron Mountain is able to run a report that lists all boxes held which have been assigned destruction or review dates, but this report does not link the boxes to the department/office that transferred them.
[6] In the case of Estates, approximately 1200+ boxes of files have been sent to date.

- Middle managers, faced with overloaded work programmes, competing priorities and a lack of knowledge of senior management priorities with regard to records and information management risks, are often reluctant to allocate sufficient time for staff to perform records management duties. Tied to this, there is the perception that middle managers regard staff attendance at records management training events as a low priority. Together these barriers form a key factor at the heart of there being insufficient control of hard copy records and lack of control of records held electronically. Without sufficient time to undertake routine records management tasks the reliability and usability of records can be destroyed. ***Senior managers should convey more clearly priorities, including those relating to information management risk, each year – by raising this risk to corporate level, this should flow naturally from work on the balanced scorecard. In addition, the Records Management Team (Parliamentary Archives) will work with the Corporate Learning and Diversity Team (Resources) with the aim of incorporating a general level of awareness of information management priorities, risks and resources required into the Managing for Excellence programme.***

John Pullinger
Director General of Information Services   **February 2009**

Annex A – Department of Facilities Management Response

HIGH PRIORITY RECOMMENDATIONS				
Ref.	**Issue**	**Risk**	**Recommendations**	**Management Response / Action Plan**
1	Poor information management is not seen as a strategic risk.	1-7	This is an issue that, although prevalent across Facilities, is also an issue for all Commons departments and, to some degree, should be discussed by the Management Board. However, the Facilities Management Board (FMB) should take account of the risks listed on page 2 in appropriate departmental risk registers.	The Facilities Management Board fully recognises this risk, and has included it in the Department Risk Register. The Board recognises that this Risk is presently inadequately mitigated, and has directed that an action plan be established in order bring it under full control within a practicable timescale.
2	Engagement by senior management is inadequate to ensure compliance with records management policy. As a result, the requirement to manage records is regarded as a low priority by staff at all levels, with some exception.	1-7	Make permanent the role of Record Champion, which ensures overall responsibility for departmental records management is assigned at a senior level.	The FMB recognises that records management practices need to be more coherent and better disciplined across the Department; this is one of a broad and demanding range of Risks that are under active management. Compliance will therefore be achieved, but not immediately. **Action:** The Department has established a Records Champion, who will have a permanent (albeit part time) responsibility for overseeing and co-ordinating the quality of records management via an effective network of Directorate Records Officers.
3	Many members of staff have not received any training in records management.	1-7	Require all relevant staff that produce, reference, maintain and destroy records to attend House-wide records management training over a period of time to be agreed with the Records Management Team. **NOTE:** *training should not be a one-off occurrence – staff should attend refresher training at regular intervals, and attendance should be monitored.*	**Agree** **Action:** A training programme will be drawn up in liaison with the Records Management Team **Person responsible:** Johan Van Den Broek **Timescale for completion:** March 2009

Ref.	Issue	Risk	Recommendations	Management Response / Action Plan
3	Continued from above…	**1-7**	Integrate records management guidance into departmental/directorate induction for new staff.	**Agree** **Action:** Guidance, to be provided by the Records Management Team, will be provided at Induction **Person responsible:** Johan Van Den Broek **Timescale for completion:** March 2009
			Ensure that temporary staff are adequately trained in records management procedures; consultants and contractors should also be made aware of their requirement to return parliamentary records to the department upon completion of a project.	**Agree** **Action:** All relevant directly employed temporary staff will be trained as necessary. Requirements concerning the return of parliamentary records, to be provided by the Records Management Team, will be given to all consultants and contractors. **Person responsible:** Johan van den Broek **Timescale for completion:** March 2009

			Embed records management procedures in relevant procedures manuals	**Agree**
				
				Action: Department wide structure to be determined by Records Champion; Directorate level structures to be determined by DROs be in place by May 09, and audited by the Department Records Champion.
				
				Person Responsible: Martin Trott (Department Records Champion)
				
				Timescale for completion:
				        Dept Structure – Mar 09
				        Directorate Structures – May 09

Ref.	Issue	Risk	Recommendations	Management Response / Action Plan
4	Failure of some record officers to ensure that basic procedures are adhered to and that support and guidance are provided. Where record officers demonstrate a sound understanding of records management policy and procedures, they are unable to influence or exert authority over more senior colleagues.	**1-7**	Taking into account the role of the Record Officer[7], directorate Heads of Office should review their selection of Record Officer and reappoint this role if necessary; Record Officers must be visible and have the ability to influence and exert authority over staff at all levels in the directorate.	**Agree** **Action:** Directors to confirm nomination of Records Officers, consulting with Records Champion to ensure consistency. **Person responsible:** Directors **Timescale for completion:** Jan 09
			Ensure Record Officer responsibilities are included in individual's forward job plans and their effectiveness in this role is reviewed annually.	**Agree** **Action:** Performance and Development Management system will reflect the role, tasks and targets of Records Officers. **Person responsible:** Martin Trott **Timescale for completion:** Apr 09
			Consider establishing a 'tree structure' underneath the directorate Record Officer, with each section in the larger directorates appointing local records administrators to serve as the Record Officer's liaison for that area.	**Agree** **Action:** Following the review of Records Officers, a structure to ensure compliance with records management policies will be devised. **Person responsible:** Martin Trott **Timescale for completion:** Jul 09

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[7] Record Officers liaise with the Records Management Team (RMT), based in the Parliamentary Archives, on all issues relating to records management in their department/office, which includes: overseeing implementation of corporate records management policy and practice in their area; building up expertise on records management issues in order to advise staff in their area; acting as a contact point for staff with records management problems or queries; and working with the RMT to raise awareness of the importance of records management in their own areas.

Ref.	Issue	Risk	Recommendations	Management Response / Action Plan
5	Too many file lists exist across the department (e.g. approximately 15-20 lists in Estates alone), some of which have been abandoned. Few lists record sufficient information to achieve a basic level of compliance, especially with respect to disposal, and many are not accessible to all staff within a section, nevertheless across the directorate or department as a whole.	1, 5, 6, 7	Verify whether file lists are still in use, and if not check whether information contained on them needs to be integrated with other lists or destroyed as an out-of-date duplicate.	**Agree** **Action:** An audit of file lists will be carried out under the direction of the Records Champion **Person responsible:** Martin Trott **Timescale for completion:** Oct 2009
			All current files lists across each directorate should be brought up-to-date, and include the information required as per the template available on the Records Management Team's intranet pages.	**Agree** **Action:** A full reclassification exercise will be carried out under the direction of the Records Champion **Person responsible:** Martin Trott **Timescale for completion:** July 2010
			Complete sign-off by the Records Management Team of all departmental file lists.[8]	It would be helpful for the Records Management Team to engage with the Records Champion as this work progresses, and then to conduct a follow up audit. **Action:** Records Champion maintain a dialogue with the RMT, and invite a follow up audit following reclassification exercise. **Person responsible:** Martin Trott **Timescale for completion:** Incremental Jul 10

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[8] Sign-off consists of a member of the Records Management Team (RMT) checking the file list, proposing amendments if appropriate and verifying when amendments have been made and that the implementation of the Classification Scheme meets standards. Requests for amendments relating to several sections of the former PED/PWSD were sent via the Estates Archivist in February 2005. Despite subsequent attempts by the RMT to follow-up, no further progress has been made.

Ref.	Issue	Risk	Recommendations	Management Response / Action Plan
6	Staff are using shared drives and personal drives, and Outlook folders as their main method of file storage. As a result, a significant amount of substantive records are held only electronically, orphans (i.e. folders with no apparent owner) are common and heavy duplication exists. Folder structures and file names used are not intuitive; ad hoc, person-dependent methods are endemic.	1, 2, 5, 6, 7	Department to ensure shared drive folders are organised as per the Parliamentary Classification Scheme to ensure links between paper and electronic records.	**Agree** **Action:** Staff will be trained and records will be managed under the supervision of Records Officers under the direction of the Records Champion. **Person responsible:** Martin Trott **Timescale for completion:** March 2011
			Substantive records are printed, filed and then deleted from the network, and disposal instructions are applied to remaining records.	**Agree** **Action:** Staff will be trained and records will be managed under the supervision of Records Officers under the direction of the Records Champion. **Person responsible:** Martin Trott **Timescale for completion:** March 2011 - Incremental
			Folder structures are signed-off by the Records Management Team.	See above on file lists – Incremental.
			Develop awareness of what types of information can be stored where (for both for hard copy and electronically held records) through departmental newsletters, staff meetings, etc. and enforce through Records Officers and Administrators.	**Agree** **Action:** Develop awareness via the departmental communications channels **Person responsible:** Martin Trott, Liz Crotty **Timescale for completion:** Mar 09

Ref.	Issue	Risk	Recommendations	Management Response / Action Plan
7	Disposal of parliamentary records is not authorised.	7	Sections within directorates should assign responsibility to authorised signatories for the disposal of parliamentary files; these individual(s) is accountable for whether records are disposed of according to policy. A list of authorised signatories should be maintained by the appropriate Record Officer.	**Agree** **Action:** Following the nomination of Records Officers a new authorisation system will be set up **Person responsible:** Martin Trott **Timescale for completion:** Jul 09
			A joint SAA/Facilities file list of records held in the 'dungeon' should be brought up-to-date and include all required information, divided between Facilities and SAA and disposal instructions applied to Facilities records and recorded as appropriate.	The Dungeon file list is up-to-date. Dividing the records into two is not a priority. **Action:** The Executive Office, Accommodation Office and SAA Office will work together to manage future disposal & archiving of these records. **Person responsible:** Martin Trott **Timescale for completion:** Jan 10
8	Heavy use is being made of the off-site records store, currently under contract to Iron Mountain. Pressure from senior management in the past has resulted in, records being transferred off-site without reference to the Authorised Records Disposal Practice. As a result, records that ought to be destroyed or transferred to the Parliamentary Archives for permanent preservation are instead transferred to Iron Mountain.	3, 5, 6, 7	Define and initiate a discrete project to address the problem of the backlog of files transferred (approximately 1200 boxes) and resource appropriately. **NOTE:** *The RMT can provide advice on organising/ prioritising tranches that will need to be recalled to ensure that vital records and other records of long-term historical/ administrative value are removed and either managed as vital records or transferred to the Parliamentary Archives cataloguing and preserving. The RMT can also advise/ agree with the project manager how best to handle assigning destruction dates to the remaining materials (i.e. broad destruction dates may need to be assigned retrospectively).*	**Agree** **Action 1:** Appoint project manager and initiate discrete project to address the issue. **Person responsible:** Martin Trott **Timescale for completion:** March 09 **Action 2:** Work on the programme & determine the resources required. **Person responsible:** Project Manager **Timescale for completion:** July 09

Annex B – Department of Resources Management Response

	HIGH PRIORITY RECOMMENDATIONS			
Ref.	**Issue**	**Risk**	**Recommendations**	**Management Response / Action Plan**
1	Engagement across management levels in the department varies and is inadequate to ensure comprehensive compliance with records management policy.	1-7	Make permanent the role of Record Champion, which ensures overall responsibility for departmental records management is assigned at a senior level.	**Agree:** Appointed. **Proposed Action:** Action complete. **Person responsible:** Janet Rissen. **Timescale for completion:** Action complete.
2	The department is retaining personal data beyond agreed retention periods. This has implications for compliance with the fifth data protection principle.	4, 6	Implement procedures to ensure personal data is not kept for longer than is necessary; this includes data held in HAIS and on other databases, and in hard copy form on personnel files.	**Agree** **Proposed Action:** 1) Draft procedures in consultation with RMT; 2) Implement; 3) Monitor compliance. **Person responsible:** Bob Castle. **Timescale for completion:** Jan – Jun 09.

Ref.	Issue	Risk	Recommendations	Management Response / Action Plan
3	Many staff are unaware of the strategic importance of complying with records management policy, and may be unaware of their individual responsibilities.	1-7	Require all relevant staff that produce, reference, maintain and destroy records to attend House-wide records management training over a period of time to be agreed with the Records Management Team (RMT). **NOTE**: *training should not be a one-off occurrence – staff should attend refresher training at regular intervals, and attendance should be monitored.*	**Agree** **Proposed Action:** 1) Discuss with RMT possible tailoring of training courses to meet DR's specific needs; 2) Schedule agreed course programme; 3) Promote programme (sponsored by Director General and DMB to ensure high attendance); 4)Assess impact of training e.g. immediately after, and then 3 months after end of programme. **Person responsible:** Bob Castle. **Timescale for completion:** Jan – Apr 09 (for initial training and refresher courses).
			Work with the Records Management Team (RMT) to identify how records management training can be added to the HAIS self service training module.	**Agree** **Proposed Action**: 1) Review existing modules (in liaison with RMT and the Corporate Learning & Development Manager) and agree on the most appropriate additions to the HAIS training modules. 2) Launch revised training modules. 3) Monitor and review effectiveness. **Person responsible:** Bob Castle. **Timescale for completion:** Jan – Jun 09.

Ref.	Issue	Risk	Recommendations	Management Response / Action Plan
3	Continued…	1-7	Ensure that consultants and contractors are made aware of the requirement to return parliamentary records to the department upon completion of a project.	**Agree** **Proposed Action:** Revise standard contract documentation, ensuring that it incorporates a specific clause covering this issue. The clause should clearly assign responsibility (to the Contract Manager) for ensuring that the parliamentary records concerned are returned to DR on completion of a project. **Person responsible:** Bob Castle/Kevin Treeby. **Timescale for completion:** Jan – Apr 09.
			Embed records management procedures in relevant procedures manuals.	**Agree in principle**. However, it is not practicable to embed such procedures in all our existing manuals. We will address this using one set of records management guidance, focussing our effort on reinforcing the application of that guidance across the department. **Proposed Action:** 1) Agree content of guidance in consultation with RMT; 2) Issue to relevant staff and managers and adopt a variety of methods of reinforcement (to be explored and discussed with RMT) 3) assign responsibility for future maintenance of the guidance. **Person responsible:** Bob Castle. **Timescale for completion:** Jun 09 – May 10.

Ref.	Issue	Risk	Recommendations	Management Response / Action Plan
4	The Records Management Officer role does not include proactively monitoring whether basic procedures are being adhered to across the department. The role is also largely focused on the storage and retrieval of hard copy semi-current records, resulting in low awareness of the requirements to manage electronic copies of records in line with policy.	1-7	The remit of the Records Management Officer role should be examined to consider whether it should include proactively monitoring records management across the department.	**Agree** – DR identified this issue prior to the audit, and had begun the process of review by transferring the RMO to the Information Rights and Information Security Service, where she could be managed from within a team of specialists. **Proposed Action:** Review the nature and remit of the RMO role with a view to strengthening the monitoring of compliance with corporate policy and procedures aspect. **Person responsible:** Bob Castle. **Timescale for completion:** Jan - Feb 09.
			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.	**Agree** **Proposed Action:** 1) Agree responsibilities of Local Records Administrators (or 'Champions as DR prefers) in liaison with RMT; 2) Identify which members of staff will acquire this role; 3) Provide briefing and/or training as necessary to ensure that the LRCs are fully equipped to perform their new responsibilities. **Person responsible:** Bob Castle **Timescale for completion:** Jan – Mar 09**.**

Ref.	Issue	Risk	Recommendations	Management Response / Action Plan
4	Continued…		Consideration who to assign the responsibility, and ultimate accountability, for ensuring electronic records held in databases, on network drives and in Outlook accounts are managed in line with policy.	**Agree** **Proposed Action:** 1) Identify electronic data owners; 2) Agree (and brief them on) their responsibilities in line with parliamentary policy and best practice. This piece of work will be linked to the Data Security Review work already underway within the Information Rights & Information Security Service. **Person responsible:** Bob Castle. **Timescale for completion:** Jan – Dec 09.
5	Lack of disposal of information held in databases maintained by the department.	4 - 7	Review the databases owned and used by the department to manage information and apply disposal instructions to the data held in these. NOTE: *If during this the department identifies information not adequately covered by the ARDP, the department should consult with the RMT to resolve these.*	**Agree** **Proposed Action:** 1) Document list of owners for all databases held by DR; 2) Assess data held in order to determine appropriate disposal action; 3) Apply disposal action in accordance with established policy and procedures. **Person responsible:** Bob Castle. **Timescale for completion:** Jun 09 – Oct 10.
			Ensure that procedures are written and distributed to relevant staff in Resources and PICT to facilitate the disposal of data held on databases as per the ARDP.	**Agree** **Proposed Action:** 1) Draft procedures in liaison with RMT; 2) Distribute to relevant DR staff and to PICT; 3) Assign responsibility for future maintenance. **Person responsible:** Bob Castle. **Timescale for completion:** Jun – Dec 09.

Annex C – Summary of Audit Findings from the Departments of Facilities and Resources

Observations

Key questions probed in the audit were: do the Departments of Facilities and Resources know what records/data they hold and where they are stored in order to find them? And can they be certain that those records/data that must be kept are being kept and are easily accessible, and those which ought to be either destroyed or transferred to the Parliamentary Archives are being disposed of properly?[9]

Taking into account the evidence that was submitted by both departments, hard copy records are better managed than those materials held electronically.

The Department of Resources knows, on the whole, what hard copy records it holds and where they are stored, although in some instances there is a lack of *consistency* in how records management procedures are implemented and maintained across the department (e.g. some files are listed and classified on the central departmental file list only when they are transferred to semi-current storage).   In the Department of Facilities, however, evidence submitted reflects a more general lack of compliance with even basic records management procedures, with areas managing financial and human resources records being an exception. In much of Facilities the ability to locate hard copy records is compromised by a plethora of incomplete and sometimes inaccessible file lists (e.g. locations are not accurate and up to date, and file lists are frequently held on individual's personal drives).

In both departments, staff use shared and personal areas on the network drives as a common method of file storage. However, the structures used for organising information electronically are often ad hoc and person-dependent (e.g. departmental records held on the shared drive, but organised according to date only or in folders with obscure titles; departmental records held only in personal drives or in an individual's Outlook folders). It is recognised that individuals know generally where records are located electronically and can access them reasonably efficiently. However, in the absence of that individual, these records easily become inaccessible to colleagues and the department as a whole. As a result, the department cannot control whether electronic information that must be held is being kept, and that information that ought to be destroyed is deleted in an authorised way. Furthermore, it is not uncommon for materials held in this way to reside on the network drives permanently, even where the corresponding hard copy records have been destroyed, thus undermining records management policy and practice. The rejection of the corporate system in favour of holding information under the control of individuals also reinforces the widespread perception among staff that these records are their own and do not need to be accessible to other staff.

The Department of Resources has effective procedures in place for the destruction of hard copy records sent to off-site storage, and the authorised destruction of these materials occurs regularly and is documented. However, evidence submitted shows that the department is routinely retaining other records beyond the agreed retention periods identified in the *Authorised Records Disposal Practice* (ARDP) and is failing to identify and transfer records worthy of permanent preservation to the Parliamentary Archives. Examples include records held in hard copy personnel files where regular weeding is necessary to ensure information is destroyed in a timely fashion, policy records

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[9] Consistency of disposal is a particularly high priority for two reasons. Firstly, because the FOI act relates to all information *held* by the House of Commons, whether on site or off site, in hard copy or electronically, centrally or individually, the House needs to be sure that it can account for the existence or otherwise of duplicate information in all those areas when answering FOI requests. Secondly, if records are not disposed of in a timely fashion, the costs incurred in their unnecessary storage can be significant, particularly in terms of off-site services.

which should be kept permanently,[10] and records held electronically on shared and personal drives. Remarks and evidence supplied that relate to the disposal of data in databases indicates that while procedures have been put into place recently to ensure the systematic disposal of financial data held in HAIS, the disposal of other records held in this system and other databases is not occurring. This is of particular concern as much of the data held in such systems relates to identifiable, living individuals, both Members and employees of the House, and therefore the fifth principle of the Data Protection Act 1998 applies to this information.[11]

Apart from the Finance and Human Resources Offices in the Department of Facilities and parts of the Catering & Retail services that handle finances, the disposal of departmental records is arbitrary. Facilities file lists do not reflect the authorised disposal of records as per policy.

Taking into account the large volume of material produced across Facilities and the limited physical space available to store records, heavy use is being made of off-site storage. However, copies of transfer forms show that records are being sent off-site without an appropriate destruction date. Moreover, records that are ready for destruction or that should be transferred to the Parliamentary Archives for permanent preservation are also being sent off-site. The transfer of these records is an issue because, aside from the financial cost attached to maintaining records indefinitely, risks associated with off-site records stores include a greater likelihood of damage or loss and breaches of security. The latter is a problem because it appears that files with current security implications have been transferred off-site and are easily identifiable to non-parliamentary staff by the file titles included on the transfer forms. For parliamentary staff, records transferred are, in effect, lost because directorate file lists largely do not record location or disposal information and the details of transfers to off-site storage amounts to a stack of transfer forms collated in order of the date of transfer.

No evidence was submitted by Facilities to support the managed and authorised disposal of records held electronically, including e-mail. It is assumed that if any destruction of records is occurring, it is arbitrary.

Of the databases supported by PICT, some Facilities staff make the assumption that PICT periodically removes data as per the disposal policy, others were uncertain whether PICT deletes information or if the database programme is designed to do it automatically after a set period of time. It should be noted that although PICT provides support for the maintenance of databases, it does not own the data held within them and can only assist with the destruction of data if authorised by the department/directorate. Procedures are required to facilitate this. Similar to Resources, several databases in Facilities hold historical data about living individuals (in particular Members of Parliament) and therefore Data Protection principles apply.

Lack of training and awareness is at the root of many of the problems described above. There is a strong understanding of the need to manage records and information properly and responsibly among staff in the Department of Resources, which is due largely to the nature of their work (e.g. handling personal data, processing financial claims, maintaining Occupational Health and Safety records, etc) and their dependency on the ability to locate accurate information quickly and efficiently. Likewise, in the Finance and Human Resources offices within Facilities and parts of the Catering & Retail services that handle finances, a similar fundamental understanding of the requirement to manage records well exists. However, staff in both departments are, by and large, unaware of their individual responsibilities to conform to corporate standards, which are required to facilitate department-wide requirements for retrieval and to mitigate the risks identified on page 2.

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[10] Resources has not transferred any records to the Parliamentary Archives since 2002, when it transferred mainly ledgers and some policy files for the period covering 1916 – 1972.
[11] Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

In the Department of Facilities, records management is delegated routinely to junior staff, largely in their capacity as Record Officers.[12] However, most Record Officers have little influence or authority over senior colleagues or are proactively ensuring basic procedures are adhered to and that awareness of the programme and training available, along with support and guidance are provided. Amongst staff in Resources, there is a common perception that the department's Records Management Officer (RMO) is responsible for overseeing and implementing all aspects of records management. However, the job description for this post shows that this role is concerned mainly with the storage, retrieval and authorised destruction of paper records held in semi-current storage. We understand that a review of the RMO's role and management reporting lines is in progress.

Analysis of Risks

The findings in Facilities reflect a general lack of understanding of the House-wide risks of not managing all parliamentary records, both held in hard copy and electronically, well. Although Resources is aware of the risks and consequences, the department is not fully aware of the extent to which problems identified might undermine their efficiency.

For Facilities, and especially Estates, the findings are of significant concern because the department is one of the more vulnerable departments in the House of Commons given that it is subject to an increasing volume of Freedom of Information (FOI) and Environmental Information Regulations (EIR) requests, as well as other requests for information including PQs. The department also holds a large volume of records that must ultimately be either destroyed or kept for long-periods (e.g. 40 years) or permanently in compliance with negotiations with the National Audit Office, contractual obligations, legislation and regulations (including those relating to Health and Safety), as well as holding significant vital records regarding the maintenance of the buildings and security of the Estate. Key records series that relate to Members' use of parliamentary services and facilities (i.e. functions, accommodation, etc) and to the infrastructure, furnishings and fittings of the Estate including its maintenance as a World Heritage Site are also held across the department, all subjects which have been the focus of a number of FOI/EIR requests and PQs to date. Failure to maintain records relating to these issues not only poses a reputational risk to the House, but can also lead to other areas of the administration incurring unnecessary expense.[13]

The findings of the audit in the Department of Resources are also of concern, particularly in relation to non-compliance with records disposal policy, because the department is also subject to a substantial volume of FOI requests and PQs. It holds a large volume of records that will ultimately be destroyed in line with protocols agreed with the National Audit Office, or which need to be managed in line with statutory obligations. Key records series that relate to Members' expenses and other payments, and House-wide policy directives that ensure the House can meet its obligations toward employees and others (e.g. Occupational Health and Safety records, pension records, etc) are also held here.

In the current business environment, with its prevalence of electronic documents and e-mail messages, existing habits are putting the departments, and the House, at risk due to less than sound practices surrounding records retention and statutory and regulatory compliance. In turn it is likely that this is resulting in lower productivity and higher costs for records storage and maintenance.

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[12] Record Officers liaise with the Records Management Team (RMT), based in the Parliamentary Archives, on all issues relating to records management in their department/office.

[13] For example, in 2005, the failure of the former PWSD to locate records of the ICT cabling in the Palace of Westminster led to the former PCD having to survey cabling in the Palace at a cost of approximately £70,000.   This information was required to underpin work relating to the Business Continuity/Disaster Recovery (BC/DR) project concerning the parliamentary network. The records of this survey were given to PWSD upon completion to be held for future reference. However, at the time this report was written, the department has been unable to locate these records