



# SETTING THE RECORDS STRAIGHT

It takes more than  
technology to deal with  
the deluge of data

## A records management systems is now a necessity for all organisations — but where to start?

ANDY ELLWOOD talks to a specialist consultant and maps out a strategy

**I**n the days before computers were widespread in business and government, life used to be relatively simple. Information tended to grow slowly. It was hard to get hold of information — so no one asked. In offices throughout the country, paper records were meticulously and laboriously created and filed. Photocopiers were rare, so copies were rare — unless they were created with carbon paper. It was frustrating, labour intensive and slow, but it worked and legislation was minimal. If information is power, then only a few people in the organisation attained that power.

For people of my generation, the image of a typical workplace fed to us through television was of beige offices populated by men in brown checked suits shouting at mousy secretaries to “get that file” from a bank of grey filing cabinets.

Those days (if they ever existed in such a stereotypical and sexist way) no longer exist. It is indisputable that the widespread adoption of technology has made businesses more efficient and opened up more possibilities for all. But these improvements have brought with them new issues and complications that need to be addressed.

Alongside the growth of technology, the notion of the information society also grew. Unfortunately, the technology that was developed to help manage this information has been largely instrumental in creating it. A couple of years ago, researchers at University of California, Berkeley estimated that the amount of information created in the previous two years was larger than the total amount of information recorded in the whole of previously recorded time.

People have now become used to the idea of getting information when they want it. Companies are no longer prepared to wait weeks or months for sales or customer data. Data proliferates faster than the systems and regulations needed to control it. This is of particular concern in the whole area of personal information that is now routinely collected by business and governments alike.

The main difference between a modern, paperless office and a traditional beige one is that the paperless office uses more paper. One of the downsides of new technology is that people still prefer to read information from paper and so keep printing it out. In 2002, University of California at Berkeley calculated that offices worldwide used 43pc more paper than they did in 1999. Technology not only caused new types of information to be created, but also caused much more traditional data to be created. Organisations are getting hit by a data double whammy.

As regulations caught up with the

situation, technology moved the goalposts and invented new methods of communication such as email, SMS and instant messaging (IM). It was inevitable that some order would need to be imposed on the chaos. As a result, effective records management has become an increasingly essential part of modern organisations, but the real issue is whether they recognise it.

### Act drives uptake

In the public sector, the main driver has been the Freedom of Information (FOI) Act, 1997. All records relating to individuals personally, whenever they were created, and all other records created after 21 April, 1998 must be capable of being identified and retrieved quickly for FOI purposes. Although there has not been something as important and as singular as this in the private sector, the increasing emphasis on corporate compliance and the various associated shredding scandals that led to this have created an environment where this is also important.

According to Martin Bradley, a leading Irish records management consultant: “The private sector has been a little slower in addressing records management, primarily because of the lack of any single piece of legislation to drive interest in the area, such as the FOI Act.”

By comparison, the drive for FOI has galvanised the public sector to invest in records management solutions, as there had been a significant decline in this area during the Eighties.

Bradley continues: “The key element that drove records management from within FOI was the inclusion of the clause that institutions could only charge for the retrieval of information or schedule it for destruction within the terms of a stated records management policy. If you were not able to find information, or it took vast quantities of staff time to find information to respond to a request, it was your responsibility. The fear of being swamped by requests for information that couldn't be found led many public bodies to seriously examine their requirement for proper records management systems.”

Another element in the FOI drive towards good records management is one of embarrassment. The FOI legislation is policed by the Office of the Information Commissioner, a body that has the power to carry out an investigation at any time into the practices and procedures adopted by public bodies and present this to a joint committee of both houses of the Oireachtas.

During reviews, the commissioner may find examples of poor record management because of fundamental flaws in a particular organisation's

## Eight steps to creating a proper policy

HERE are some steps that need to be taken to implement a records management policy that meets the ISO 15489 standard. This is a process and the steps should be taken in the following order:

### 1 Initial overview of requirements

Examine the administrative requirements of your organisation, including all current internal administrative procedures, as well as external aspects such as economic and legal imperatives

### 2 Analysis of internal administrative structures

Carry out an in-depth analysis of your organisation's structures, functions, processes and activities

### 3 Identify records requirements

Identify what influencing factors affect the creation and maintenance of records in your organisation — some may be determined by legislation

### 4 Assess systems, analyse processes

Assess any existing systems, however informal they may be, to see if and how they can be merged into any new systems and processes

### 5 Identify records strategies

Define a companywide strategy incorporating policies, standards and practices

### 6 Design of a system

Design a records management system that incorporates best practice and most importantly matches the requirements of your organisation in order to minimise interference with core activities during the period of its implementation

### 7 Implementation of a system

Implement in easy-to-manage stages, each with an appropriate consultation period. Don't forget the need for comprehensive staff education

### 8 Review of all systems

Ensure all systems are working as designed, all records are accounted for and staff members have an adequate understanding of the requirement for a records management system, as well as a detailed operational knowledge of it.

record management policy. To illustrate this and the issues that can lead to this, in 2002, the commissioner discovered that the Defence Forces "appeared to be having difficulty" in locating records concerning applications to join the Irish Army. What transpired was that from the Eighties until 2002 there had been no policy in place relating to the maintenance of records relating to unsuccessful applications in some of the commands and brigades of the Defence Forces.

For those records that could not be found, there was no record of their destruction or information relating to what may have happened to them. Just as the commissioner was considering whether to carry out a formal review, the Defence Forces themselves recognised shortcomings in this area and had started work on a formal records management policy.

## Case sensitive

Where shortcomings in records management concern sensitive and personal data, the issues can be far reaching. In July 2002, the Department of Health and Children started a project to index the records it has concerning people who, as children, were in the care of the State. There were apparently a large number of general files that mentioned individuals and these were not catalogued. One of the reasons why the department embarked on this project was the fact that it was getting a large number of requests for information under FOI legislation.

For people trying to find out about their past, it must be frustrating — not to mention suspicious — if their requests for information are refused because that data cannot be found.

To lead by example, the organisation published its own internal records management handbook late last year. In the document it states the absence of a proper records management policy "is directly linked to inefficiencies and increased costs" and that its policy of keeping everything indefinitely was "inadequate and would leave the Office unable to cope with the growing mass of unmanaged records". It provides a useful pointer for other organisations and is available at [www.oic.gov.ie/264e\\_3c2.htm](http://www.oic.gov.ie/264e_3c2.htm).

Bradley agrees that ridicule is also a powerful incentive for businesses to act — albeit for the wrong reasons: "Many businesses have come to the area as a reactive measure, especially in the wake of tribunals and legal investigations where their inability to lay their hands on necessary documentation has been a source of embarrassment."

To properly galvanise the private sector in the same way as the public sector, Bradley believes the Government needs to put out a single piece of legislation that covers all records management requirements for companies and clarifies the situation in a definitive way.

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"Most of the legal framework that affects records management, especially requirements for things such as permanent periods and retention media, is hidden away in a swathe of legislation such as the Organisation of Working Time Act, 1997, the Safety Health and Welfare at Work Act, 1989, the Electronic Commerce Act, 2000, the Data Protection Act (including the Data Protection (Amendment) Act, 2003) and many more, so you really need to know your way around the different acts in order to be really compliant."

Bradley reckons most businesses and government bodies are "pretty good" about their records management, but don't necessarily have the most effective or systematic approach.

Even without legislation, there are some convincing economic arguments for adopting an official records management policy. At the moment, companies are so scared of throwing anything away that might be needed later they often hoard vast quantities of unneeded, unused documentation. This 'let's be on the safe side' policy may seem cheaper than investing in a records management policy, but it is a short-term approach that hides significant business benefits.

Bradley feels that the first benefit such a policy brings is to give organisations the confidence to safely dispose of extraneous paperwork, knowing that their legal obligations have been checked and there is a schedule and procedure for doing this. "As a rule of thumb, about 40pc of what is held in offices can be classed as extraneous in this context — the savings in the physical cost of storage and the

manpower needed to perform it can be significant.

"Money can also be saved by helping organisations lay their hands on the information they need, when they need it. The average organisation makes 19 copies of each document, spends €120 in labour searching for a lost or misfiled document, loses one out of every 20 documents and office workers can each spend 400 hours per year looking for lost files. As between 1pc and 5pc of all documents are misfiled, this is not really surprising. The potential for cost savings is significant and provides fairly quick return on the investment in establishing the policy," Bradley explains.

## Ireland lagging

At the moment, countries such as the US, UK and Australia are ahead of Ireland in developing this records management culture, but Bradley feels Irish companies will catch up fast, once they see the significant savings to be made. In an increasingly competitive world market, any measures to improve efficiency and cut costs tend to be grabbed by businesses with both hands.

These policies have tended to relate to the management of traditional data, but the increasing use of technology is causing specific problems that can be addressed in a records management policy.

One of the first errors organisations make is to assume that because information is being stored electronically, then it is the responsibility of the IT department and not the records management policy. Any communication that documents a business

transaction or function should be classified as a record and this includes emails, spreadsheets and databases, as well as more traditional paper-based records. It is the content that is important – not the medium.

Bradley agrees that the newer technologies have also created extra problems – in addition to them adding to the amount of records being created. "There is no doubt that email, IM and SMS have opened up a can of worms for many organisations. For instance, many firms involved in share trading have had to freeze out their employees from IM products such as Yahoo!/MSN Messenger for fear of sensitive information being leaked.

"The real danger is that employees view these forms of communication as being personal, whereas they are in fact business transactions. They can be easily traced to the issuing organisation, so a clear policy must be in place for these services to ensure nothing libellous or containing sensitive business information about the company or its clients is inadvertently passed on," he warns.

Email is a key area here. Many people are quite ruthless at maintaining an empty inbox, whereas others tend to only delete information when quotas are breached. In both cases, key company records could be destroyed. If companies recognise the importance of email in this context they tend to keep everything just in case. The issuing of guidelines on which email constitutes a business record and mechanisms to file them accordingly will help ensure obligations are met, while minimising unnecessary storage costs.

To meet the demand for standards in this area, the International Standards Organisation (ISO) launched the first standard in this area in 2001. It is named, in typically romantic Swiss fashion, ISO 15489 – Information and Documentation – Records Management. Aimed at those responsible for setting policies, standards and guidelines for information management within organisations, it is now possible to attain accreditation in ISO 15489 from the National Standards Authority of Ireland.

The standard was put together by experts from Europe, North America, Asia and Australia, who jointly reached agreement on a clear and systematic approach to the essentials of record keeping.

At the time of its launch, Robert McLean from the ISO technical committee that drew up the standard was quoted as saying it "clearly shows how an organisation can systematically and effectively improve its record keeping – and do so in such a way that the business objectives are supported. Senior management will be able to identify tangible benefits such as reduced costs and better managed risks, thereby contributing to better corporate governance". For those executives who see this as just another

burden on their business this should be a nice bonus for them.

In the absence of a single piece of legislation, this standard may well act as the catalyst the private sector needs to adopt professional records management policies and there is a precedent for it. Companies did not adopt and develop quality policies and procedures from the Nineties because of the requirements of legislation, but because there was an internationally recognised standard – ISO 9000 – the attainment of which was used to signify that the organisation had developed systems to help improve their business and, therefore, their customer care.

It soon became common for businesses to only agree to do business with organisations that had achieved ISO 9000 and so it became a self-perpetuating approach. Bradley thinks ISO 15489 will soon achieve the same level of significance because it "reflects a commitment to good record keeping and assures clients and regulatory bodies that your organisation takes records management seriously, with all the benefits to efficiency that entails".

He continues: "Before there was no benchmark for records management, but this standard allows organisations to clearly show that they organise their information efficiently, which I suspect will have a major impact on which companies get chosen, especially for government contracts, in the future."

### Reasons for records

The benefits in terms of efficiency, savings and compliance have already been discussed, yet some people still need to be convinced. The Public Record Office of Northern Ireland (PRONI) provides another powerful illustration of the need for efficient records management.

Under the UK's so-called 30-year rule, many unpublished state papers are released to the public after a 30-year period each January. This year that means we should now have access to papers covering a defining moment in Northern Irish history – the power-sharing executive of 1974 and its

collapse. This is of particular interest to historians and politicians, given the current political situation.

Minutes of meetings and the daily operation of the executive would provide a clear picture of what happened and may help to understand what subsequently happened. Unfortunately these have all gone missing. It was reported in *The Irish Times* in January that a PRONI spokesman had confirmed the organisation's inability to find the missing files. The context has arguably given these papers more importance than they would normally have received, but it is nevertheless an embarrassingly public failure of records management.

As we have seen, these failures have also happened here. In addition to being inefficient, it can also create suspicion. When, for example, a member of the public is told that an FOI request cannot be met because the records cannot be found, the first thought that comes to him or her is that something is being hidden. This tends to colour any future correspondence on this issue and does no favours to anyone.

Another example of the damage caused by missing files is provided by the recent nursing homes charging affair – a lot of the publicity in the press and from the Opposition focused on the inability of the investigation to find documentation to support various versions of events.

You may tend to believe these circumstances are caused by cock-up and not conspiracy. Unfortunately, there are also plenty of conspiracy theorists around and they tend to appear when information is not available. This complicates any situation.

Therefore, a solid records management policy can also significantly contribute to your public image and reputation. Not only will it allow you to save money and time, but it also helps you to save face.

**For more information and guidance on records management visit [www.archives.ie/consult.html](http://www.archives.ie/consult.html) or email [info@archives.ie](mailto:info@archives.ie).**

## Records breakers

Here are the common mistakes made by organisations:

- allowing employees to decide how electronic records are filed, for instance 'Dave's Files', rather than using a strict system of filing by category or department
- not issuing instructions to employees about how to tell if an email fulfils the criteria as a business record, and if so how to file it accordingly
- thinking electronic records are the domain of the IT department, rather than treating them as part of the records management policy
- hoarding vast quantities of paper-based records for fear of needing them some day
- thinking that scanning documents solves their paper problem. It doesn't – it just doubles it
- not spending any time on records management at an early stage in the organisation's life. It's the kind of area that can be overlooked and patched over as cracks start to appear. All organisations have to address the issue eventually, so it's best to put proper procedures in place before the volume of records becomes too daunting.

## Helping hands: software and consultants

BECAUSE of the number of IT vendors promoting content management or document solutions, it is easy to assume there is a plethora of software applications on the market to help you. It is true there are lots of solutions available that allow users to create catalogues and inventories of their paper records and to link these with their electronic records. Many of these packages will also allow you to enter retention periods to enable automatic alerts to be generated to notify when files can be destroyed or moved offsite.

There is no software solution, however, that can wholly take the place of a properly developed records management policy. Even though they follow similar broad principles, records management policies will, by their nature, need to be tailored to an organisation. Technology has an important part to play in supporting a records management policy, but because of the need to ensure it matches your precise requirements and circumstances it would be dangerous to rely on it totally.

Similarly, many organisations find it easy to confuse offsite storage for records management. There are lots of records management companies around that basically offer a warehousing and some form of cataloguing service. Again, this is a crucial component of a records management policy as it provides storage for documents that are not ready for destruction yet do not need to be viewed regularly – but this still does not replace having a policy.

The whole area is one that is evolving, but which has immediate benefits for organisations – both commercial and public sector. It is also a complex one with various legal requirements scattered throughout the statute book. Some short-term spend on hiring an expert in this area should reap benefits in the near future as it will prevent you from wasting time and effort for minimal returns.

When selecting consultants to help you, check their experience and qualifications carefully. They should have postgraduate qualifications in a relevant discipline, memberships of professional bodies such as the Society of Archivists and good references. Above all, you should deal with companies that specialise in records management.