

Report on the JISC 09/02 'Supporting Institutional Records Management' Project for Warwick

A six month project under Theme 1A of the JISC 09/02 call to produce a retention schedule for records relating to the Personnel Management Function, using the *Revised Study of the Records Lifecycle* and a report on the projects methodology and findings.

Executive Summary

It is a mark of the success of the *Revised Study of the Records Lifecycle* that both the JISC Function and Activity Model and Records Retention Schedule advice were adopted with a good degree of success. Both the model and retention advice were found to be sufficient in scope and detail, and issues surrounding the application of advice and development of an institutional schedule centred on interpretation and method (surveying, presentation and role of the schedule).

The Function and Activity model has many benefits but the apparent relevance of some functional designations could be misleading if the functioning of the model or the records is not given sufficient attention. The model becomes easier to apply when looked at 'in the round' and with reference to the records retention schedule.

The retention advice relating to HR records did not generally conflict with current practice and acted as an important starting point for discussion of retention, filing methods and digital preservation, particularly in the light of the DPA.

The depth of surveying and a tension between the need to address issues of duplication, version control, filing method and potential electronic document management (requiring a good understanding of workflow and the current filing/retention of documents and series) and the need for a schedule not to simply reflect current practice in detail but provide guidance to move systems forward is a common theme addressed in the report.

It was decided that the retention schedule should not be a static document or one that sits in isolation from other information and management resources. The project flags ways in which the schedule can be integrated at strategic and practical levels whilst highlighting some of the organisational issues faced in beginning an institutional schedule.

1. Introduction

- 1.1 The project aimed to chart the development of a retention policy within a complex set of records relating to Human Resources (HR) so that the policy could become the corner stone of a wider institutional approach to records management. The project has aimed to provide guidance on the University's first experience of drawing up a retention schedule. It has been developed to ensure that the retention schedule and scheduling process are not ends in themselves but that they fulfil their true potential and add value to the University. To this end it included an exploration of methods to achieve the schedule's integration within the University.
- 1.2 The following report outlines the basic methodology but concentrates on the issues raised. A detailed project plan/methodology is attached as an appendix, as are supporting illustrative material and the resulting schedule.
- 1.3 This report reflects key project themes: Background and Aims, Defining the Schedule's Objectives, Surveying and Data Collation, the JISC Function and Activity Model, Compiling the Retention Schedule, Organisational and Cultural Issues, and Integration and Support.
- 1.4 Abbreviations used in the report

DP, DPA	Data Protection (Act)
EDRM	Electronic Document and Records Management [system]
FAM	JISC Function and Activity Model
FoI, FoIA	Freedom of Information (Act)
HR	Human Resources
JISC	Joint Information Systems Committee
OIC	Office of the Information Commissioner
RM	Records Management
RRS	JISC Record Retention Schedule

2. Project Background and Aims

2.1 Institutional perspective

- Established University archive
- Commitment to establish a RM programme
- Some centralisation of records of principal administrative departments but devolved record-keeping structures and systems at departmental level.
- University: 18 central administrative departments, 30 academic departments, 49 research centres

2.2 Strategic aims and drivers (as particularly affect Personnel records at Warwick)

- Improved use of data
- Improved version control hence the accuracy of records
- Reduction of duplication,
- Responding to Data Protection Act, the DP Codes of Practice on Personnel Records, Freedom of Information
- Provision of access: DPA and subject access requests, FoI, staff and workflow (need to review filing structures also in light of potential for EDRM and a move of the administration to a new building)
- Risk management (disaster management, not retaining information or retaining longer than necessary)

2.3 Project Aims

- To apply the revised *Study of the Records Lifecycle* to records (throughout their lifecycle and irrespective of medium) generated and maintained through the subset of activities relating to 'Personnel management' within the Study's functional area of 'Resources management'.
- To test the applicability of the generic model and findings provided by the Study in an institutional context.
- To examine the potential role of the retention schedule and Study within wider policy frameworks and systems' infrastructures (as a step towards realising the full potential of the model and assessing the functionality of the revised Study).
- To draw on the project's findings to embed the Study and records management best practice into a developing, and broader, programme of institutional records management.
- To consider the means by which a retention schedule and its information are presented, accessed, interrogated and used - both by the records manager and within the wider context of the University.

3. Defining Schedule Objectives

- 3.1 Consideration of a schedule's functionality, its different user communities and how they will interact with the schedule is a difficult but necessary task and is central to later issues of presentation.
- 3.2 For the JISC project the schedule had to be presentable on the web and in hard copy format. The same methods of presentation would be important for external users (e.g. under FoI) and for the effective demonstration of the functional organisation of information – particularly the relationship between function, activity and record series. Internal use, while by no means obviating a functional approach, would also require access to information on basic departmental lines or with reference to series' titles or record-keeping responsibilities, while offering a functional point of access (where staff may be unsure as to how to find records outside their own departmental structures).
- 3.3 A review of other schedules was undertaken (see references) and the following 'fields' were decided on.

Record Series	
Description	Allows some key record types to be included to help in identification and understanding of series. May include colloquial names.
Maintained by	Records where records held/maintained and, with RM policy, assigns fundamental responsibilities
Retention Period	The defined retention period is given in relation to a specific time period or 'trip' (e.g. an action or event). An abstract period (e.g. '5 years') and 'Indefinitely' are avoided where possible.
Retention Authority	Details of the appropriate Act, regulations, policy or guidance.
Notes	For further explanation, cross-referencing
[Function/Activity]	

Fields that were considered but placed beyond the present scope of the project were the identification of vital records and security/confidentiality indicators (including identification of sensitive personal data).

- 3.4 It was decided that information from a records survey would be entered into a spreadsheet. From here data could then be moved into a word-processed document to produce a printable hard-copy or pdf file. A spreadsheet could also be converted into a relational database, with the intention that a database could then be mounted on the University intranet where users could interrogate its information more easily.
- 3.5 Having considered its objectives, it was felt that a retention schedule should not be a static document but that its true value would only be realised through more dynamic use. While the realisation of a more dynamic schedule is beyond the immediate scope of the JISC project, it remains an aim of the wider RM programme and the project methodology was formulated to enable this later stage when the schedule was populated with sufficient data. For further information on the wider links with the schedule see sections 5 and 8.
- 3.6 A dynamic schedule raises issues such as the need to maintain an audit trail of retention periods and their changes and to ensure that records are appraised against the correct version of the schedule. A strategy for tackling this will be to update the schedule at agreed points and ensure a version number is assigned to all formats/versions. The relevant version number should then be logged with the record of disposal actions made by those using the schedule.

3.7 Schedule's Role and 'Depth'

“A schedule is an important agent for change and should seek to facilitate best practice rather than reflect or codify a snapshot of current practices.”

While it is easy to support this aim and important to advocate an approach that looks at business processes and the requirements on records (rather than taking a detailed survey of records which could need constant revision and encourages a 'silo' effect when considering records and departments), there is a tension as to the depth of a schedule and surveying.

Just as the JISC RRS on its own has to be adapted to individual institutions and circumstances, the schedule could not be so generic that decisions affecting records could not be implemented easily and accurately. A certain level of detail was also required in order to address issues of duplication, different media and the wider issues of preservation and workflow. Accordingly, the Warwick project started with the concept of an observational records survey.

4. Surveying

- 4.1 The project manager began by developing a detailed survey form based on a survey of the literature (see References). Following an appraisal of the University's administrative structures to identify departments relevant to the personnel management function (which includes activities like staff training), surveying began with a series of visits to the Personnel Department. An interview technique was used to let staff describe what they do and how their records fit with that purpose. This implicitly provided an understanding of basic processes and functions and allowed connections with other series, staff concerns (about current systems, potential changes) to be addressed. While the survey form risked being superseded by an A4 pad and free-form notation, it remained useful as a means of providing some structure when needed, question prompts and thus an important degree of consistency in the data collation.
- 4.2 The Payroll and Personnel offices were surveyed in this way and although slightly more time consuming the results it yielded were very useful. For the University's Centre of Academic Practice (academic staff induction, development and training) a questionnaire was produced from a distillation of the original form and was informed by experience of the previous process. The form also yielded good results but was preceded by a brief interview with a designated member of staff so that the project aims and any concerns could be addressed.
- 4.3 Reducing duplication is a key driver in terms of the DPA and space management and any re-engineering of workflow (be it to streamline processes or establish file-plans and systems so as to aid a possible move to EDRM), first requires an appraisal of the status quo. This appraisal allows an assessment of the size of the gap between where you are and where you want to be, and of the potential options then available. Accordingly, a targeted but more detailed survey of staff personal files (personnel files) was undertaken as these files contained the greatest documentary crossover between central and departmental records. They also contain a wide variety of material with a range of retention periods and an understanding of these periods could assist in an assessment of filing methods.
- 4.4 As part of a wider records management need for an information audit and in order to quantify the scope and incidence of duplication, a questionnaire-based survey was produced and sent to all departments. The questionnaire was not limited to personnel records. While this method of surveying produced the least consistent set of responses (and was inevitably unsuccessful in garnering a comprehensive response), it provided a useful, contextual overview and information on HR records that could be extrapolated to produce a generic picture whose applicability could then be tested by follow-up with one or two sample departments. The questionnaire also provided useful experience of another surveying method for the project.

Issues to consider if using questionnaire method:

- Form design. Open or closed questions? (Closed questions will help speed and degree of accuracy of response and will suit web forms or database tables and statistical analysis. Open questions can elicit the most informative information, but quality of response can vary and large spaces for answers can deter respondents)
- Method of delivery: Paper or electronic (web form, spreadsheet, database, table)?
- Guidance: meetings to explain aims, guidance to help complete survey and provide definitions
- Timing: setting deadlines, getting departmental buy-in and responses back
- Senior management and departmental support
- Problems with buy-in are likely to be greater than with other survey methods

Survey Method	Pros	Cons	With hindsight
Interview	Engage with staff and records; get overview/detail as required. Efficient use of time and can yield fuller and more consistent data sets. Allows you to follow threads and address issues/concerns as they occur.	Lack of structure to proceedings could mean going back and forth over issues, missing questions, or hearing what respondent wants to say rather than you needing to know. Could be perceived as intimidating/challenging or raise suspicions.	Would have concentrated on interview method in first instance rather than format of survey form. An interview technique developed based around the form though which produced useful results.
Personal observation	Needs to be done alongside interview method for overview but sight of records, sampling files' contents can be invaluable.	Very time-consuming, can't be done well in isolation: need staff time/ input. Risk of leading to too involved consideration/ detail, detracting from main aim of schedule.	Would use as I did – sparingly, in instances of complex or major records series (e.g. the personal file).
Questionnaire	Important overview of institutional practices and variations; some very detailed returns; provided useful context in which to view findings from personal observation and links with wider/other series. Possibly less intrusive/intimidating for departments than a personal visit and can supply a means to gaining an institutional overview in a limited timeframe. Allows people to record comments in their own words. Lets people know what you're doing and provides an opportunity for them to engage in the process.	Differences in respondents' interpretation; variations in quality of response; response rate lower; harder to enforce; cold-calling and chasing by phone necessary, despite initial senior management push. Still need to provide adequate explanation and support for staff: can be time consuming in its management. More work involved in inputting and interpreting results, although can depend on amount of open v closed questions and nature of questionnaire. Doesn't necessarily obviate need for more detailed surveying or follow-up, so should weigh institutional imperatives v survey fatigue. Information may be more detailed than sometimes useful (e.g. colloquial names for series).	Gave detailed guidance to accompany questionnaire but less might have been more: a difficult balance. Survey form was circulated electronically, as a Word file, and on paper. Tabular form in a database would be better for closed questions and less daunting than filling in lots of sheets (although people's IT confidence may be a factor with the use of a table based on a spreadsheet or database).

- 4.5 A final 'survey' was a review of current policy and guidance frameworks (university regulations and policies), the websites of relevant departments (for documents and information published there and perhaps omitted by surveys) and the holdings of the University Archive.
- 4.6 Data was largely gathered on paper, although an electronic version of the wider questionnaire was made available. Accordingly some time was spent in having to distil and convert the data into a spreadsheet for later manipulation.
- 4.7 The project's senior management support and the active endorsement and role of the Director of Personnel Services ensured that there was a good degree of buy-in and this was helped by

raising the project's profile, setting clear tasks/deadlines and providing support for participants where necessary. The defined limits of a six month project, with rigorous project management structures, provided a useful momentum and milestones but also meant that timings were tight and curtailed a degree of flexibility to accommodate the impact of participants' other workloads and holidays.

5. JISC Function and Activity Model (FAM)

- 5.1 The FAM provides an excellent framework for the presentation and ordering of information in the schedule and, as a sectoral model echoed in FoI publication schemes, it provides a common and consistent interface to the retrieval of records information providing scope for the schedule's wider assimilation with other information resources (e.g. archive lists, publication schemes, websites). It is especially valuable in avoiding the repetition of series that would occur with HR records if a schedule were organised on departmental basis (and where the incidence and arrangement of record types can vary according to local practice).
- 5.2 In comparison to the first version of the FAM, the intermediate functions (between the broad function and activities) contained in the revised version make its use and interpretation far easier and the greater depth of the resources management functions have similarly improved its relevance and the projects found no obvious gaps in coverage. Accordingly, no new activities were added, nor were any removed from this particular function.
- 5.3 The model can present challenges in the application of record series to activities. An understanding of the wider model was essential, particularly when focussing on a particular functional category as this provided important distinctions, not immediately apparent when looking at individual entries, and clues to the rationale (see 29.16, 29.14 and 28.14 relating to pension records). The RRS was also an important interpretative aid, listing core document types belonging to the functions/activities (see 29.16 in RSS as opposed to 29.16 in FAM).
- 5.4 Documents recording some functions will be found within broader records' series and some series can be ascribed more than one function. E.g. is a newsletter produced by the Centre for Academic Practice relating to academic staff development central to 'Workforce training and development' as the department might see it or 'Internal service promotion' (a wider/parallel function of the newsletter)? Both functions were assigned to this series in the spreadsheet, making the one series retrievable in both contexts. On paper, the series itself must be repeated.
- 5.5 Many of the strategy, management and planning functions were documented in the papers of committees where committees' mandates frequently meant that more than one function was relevant. Here Warwick was helped by the development of its governance website which gives committees' mandates and terms of reference which facilitated a functional analysis. Where more than one function/activity was ascribed to a series, this was recorded with the series information in a spreadsheet. The rationale here was to support more dynamic searches so that accurate results could be presented in an electronic environment that would avoid having multiple entries for the same series (as in a printed model). The functions/activities would be assigned to the series, not the series to a variety of functions.
- 5.6 Consideration of a dynamic/electronic approach to the FAM and RRS eased concerns over finding some information, particularly under activities like 'Personnel management – Employee contract management' where a wide range of documents relate. Here the depth of the survey and schedule can become an issue, as there is the potential for the structure to break down if applied at series and document level. To address the amount of material in the 'employee contract management' function, unofficial subheadings were introduced to help navigation on paper. The series title and name of the responsible department also acted as means of retrieval and provide further context.
- 5.7 A potential use of the FAM this project considered was as a source of metadata for web documents. Using the FAM's descriptors as controlled access terms could potentially greatly enhance the role played by the schedule and would aid users' requirements. For example, a

search on a function could provide you (through the schedule) with the names of those records relating to it, the requirements on the records and institutional responsibilities, besides the actual records themselves and finding aids to them. When the role of controlled access terms in EAD-encoded finding aids and electronic document and content management systems is considered the FAM could have a significant role to play, although the fact that it is not intended to be a controlled vocabulary and that its terms and structure are going to be subject to a cycle of revision, limit this role and so the FAM only provides a basis for such a departure.

5.8 It is worth stressing the value of the model even at more generic levels of information management. Having advocated the merits of a functional approach, the first version of the FAM was used by the University's Communications Office to design some functional portals for the University's intranet and a functional approach has also been adopted for the display of information in the Annual Review of the Administration.

5.9 Advantages:

- Prompts consideration of documents irrespective of their media, departmental boundaries and status by focussing on processes.
- Reduces scope for repetition of series in final schedule which would result from organising information by department
- Aids consideration of workflow

5.10 Issues

- the multi-functionality of some records
- the implications of the survey/schedule's depth
- the need to think about functions and processes carefully and to consider the model as a whole
- harder to sell the FAM as an internal resource (where hierarchical structures favoured) but the way you present the model and the use of other data (series and departmental titles) can help this without undermining FAM structure
- the application of functions is probably best done by one person with an overview of the whole model to provide a consistent interpretation.

6. Retention Schedule

6.1 The survey data was collated and brought together in a spreadsheet where like series sharing the same retention requirement could be brought together as one entry, descriptions made consistent and functional descriptions added. When relatively stable this data was then ordered automatically by function/activity and pasted into a Word document for comment in the consultation process.

6.2 *Document Series Descriptions*

These had to be specific enough to enable staff to act on them and recognise the records they refer to, yet with sufficient scope to be inclusive of variations in filing system and document nomenclature. A field for further description and a notes field allowed clarification and context and increased the potential search terms.

It was found that for the activities associated with planning and strategy and management at a strategic level it was often best to retain the JISC generic description. Not only were these descriptions suitably inclusive, and the field of records they encompassed not so prolific as to escape designation, but the specific records often belonged to a broad series with varied contents (e.g. officers' subject files, committee papers). With broader series like senior officers' subject files it was useful to define the role of the schedule in relation to archival selection criteria. It was felt that having more generic descriptions for records relating to the management/planning functions allowed this class and its retention requirement to be identified but that, in the case of subject files and broader series containing particular documents, this would support a more holistic approach to their appraisal and treatment more usefully based on archival selection criteria. Such an approach would allow supporting files and context to be preserved and not encourage the perception that document types should be plucked from a series that is otherwise hard to define in a schedule.

Some repetition of series titles was necessary, particularly in the acknowledgement of the relationship between central and departmental records and the recognition of committee records.

6.3 *Application of retention periods and JISC advice*

In order to provide practical guidance and enable implementation, it was agreed that the schedule should consider maximum as well as minimum retention requirements. Minimum retention periods are necessary to ensure limitation periods are met. Traditionally, schedules record these periods and decisions to retain for operational or historical reasons are reviewed or taken subsequently, once legal responsibilities have been satisfied. Increasingly, however, more 'finite' periods are being set – particularly in the light of the DPA, where there is a growing case for not keeping material longer than necessary. Internal space management, the need to tackle duplicated records and moves to EDRM systems provide further impetus to define more finite periods. One might even ask if the balance of risk has shifted enough recently to call for a reassessment of the way in which retention periods are presented. While ensuring material is retained long enough to meet legal obligations remains pivotal to a schedule, the risks presented by inaccurate information (old versions, out of date information), or the inability to find information quickly and accurately are growing.

At Warwick the schedule has to make clear that, except in the case of designated duplicates, material should not be disposed of prematurely in relation to the cited retentions, but equally

that, while files should be reviewed and final disposition confirmed before it is enacted, retention after this period should not be excessive.

The survey results tended to reflect current retention practice and this information was incorporated first. The JISC advice was then mapped and integrated and existing practice reviewed in the light of JISC recommendations and Data Protection considerations. Where there was *insignificant* divergence between current practice and the JISC recommended minima, the longer retention period was chosen. The retention periods cited in other schedules and models were also consulted [see References below], particularly in cases of disparity, such as the key area of the personal file. Having applied retentions and followed advice as far as possible the schedule was put out for consultation (project group, designated contacts in Personnel and Payroll offices, Data Protection officer and departments)

In general there was little significant conflict in the application of the JISC recommended minima. The JISC RRS catered successfully for most document types. JISC minima were useful in ensuring that fundamental statutory requirements were formally recognised/recorded and acted as a means to ensure that where decisions are made to retain material for significantly longer periods, these periods had to be justified and caveats could be made as appropriate. The JISC advice and Data Protection considerations acted as two important points of reference within which to consider institutional needs.

The fact that retention periods are generally defined in terms of a prior action or event in the JISC model helped to ensure it is understood and can be applied consistently. To encourage active management, terms like ‘indefinitely’ have been avoided and where records are to be held permanently a review and/or their routine transfer to a repository is encouraged. For procedures, forms and information that may only exist on websites, (currently vulnerable to deletion given the devolved management fostered by new web technology), a system whereby the need to transfer to the archive on creation has been proposed until such time as a fuller digital preservation strategy can be implemented.

The JISC advice relating to the retention of personal files (6 years from the termination of employment) differs from central government practice (PRO policy is to retain core personnel records until the individual is aged 72). The Limitation Act might also extend the JISC period to 7 years, but neither does this take account of issues relating to personal and professional liability. Whilst the current inclusion of pensions and sickness information in the central file made this issue redundant at Warwick for the present, it will be revisited with the review of filing and the forthcoming OIC guidance on medical records published later in the year (which may include further considerations on the treatment of sickness records).

The need to maintain and review the schedule is emphasised by continued legislation with regard to HR practices and the interpretation of case law will also impact on retention periods. Following the JISC schedule’s dissemination, the Employment Act 2002 has come into force (2002 c. 22), which includes provisions for paternity and adoption leave. Legislation dealing with rights surrounding employees’ sexual orientation and religious beliefs is also imminent and likely to impact on the records generated and their retention.

6.4 *Duplicated and Electronic Records: hybrid record-keeping systems*

Given the legitimate needs that devolved systems and many duplicated records serve, it was vital to recognise their existence and legislate for it so that use is within agreed but prescribed grounds. For this reason the essential split between central and departmental personnel records was acknowledged while the University considers options for further reducing duplication at

source. Such a strategy rests on an understanding of the reasons for the duplication and of the requirements to retain information. Most duplicates, for example, were created either as a means of accessing information more easily (e.g. because of physical distance) or as a means of (re-)using information in a new context (e.g. application forms as a record of those on probation). It would be necessary to establish the retention requirements on the information irrespective of whether the end-solution lies in the reactive application of decisions to current systems or pro-active system engineering. Taking these reasons and the legacy of previous filing systems into account, a subsidiary exercise was to define retention periods for records often falling within the scope of central and departmental personnel files/record systems.

For centrally maintained records, the appreciation of individual requirements allows a re-appraisal of filing methods in order to reduce unnecessary retention. For departmental records, the breakdown allows the advice to be mapped to the particular records, systems and filing structures maintained by departments (where appraisal records may be held in a personal file or in a separate series). It also allows a more precise interpretation of status (whether the record held by the department is an original or a duplicate) as it affects retention requirements.

The schedule applies to records irrespective of their medium and so in most instances electronic records are dealt with implicitly. The greatest proportion of electronic data is electronic versions of documents held by the creator, which is often maintained as part of the institutional record in paper format (i.e. reports, minutes and memos are created in Word but held in paper minute and subject files, emails may be printed where appropriate). It was decided that the schedule should concentrate in the first instance on defining how long information and records were required. As with the JISC model, advice on dealing with circulated copies, draft/early electronic versions, websites will be issued separately, alongside the schedule and other RM guidance/policies and training. Where data existed purely in electronic form (spreadsheets, databases, HR system, websites) this was recorded and flagged in the schedule as appropriate. For many series a more generic title provided sufficient inclusion where it was clear that the schedule relates to information held irrespective of its media.

Experience of the survey and schedule has been particularly important, raising issues of

- digital preservation,
- the application of retention periods to digital data, and
- the management of personal data that resides in one (electronic) system for the lifetime of the record/system [see also 7.4]

The resolution of these issues is beyond the scope of the project and some are to be explored in greater detail by the Theme 2 JISC projects. However, there is a definite role for the schedule in identifying issues, defining requirements and ultimately in helping document and enact a response. What this first version has successfully achieved is a recognition of these issues and the start of a dialogue with departments and management structures.

6.5 *OIC's Data Protection Codes of Practice for Employment Records*

The four codes of practice (three of which have been published to date) do not give specific retention advice but are concerned with how organisations put in place methods to protect personal data, allocate responsibility, establish what personal data are processed and ensure employment practices are compliant with the DPA. It is important to develop a culture in which respect for private life, data protection, security and confidentiality of personal data are seen as the norm and benchmarks include establishing responsibilities, an assessment of what

personal data about workers exists and the elimination of the collection of personal data that is irrelevant or excessive.

The retention schedule is central to this process. Moreover, the issues raised in the guidance relating to the current design of individual records to facilitate the deletion of excessive information has to be informed by an understanding of retention requirements (institutional and legislative) and workflow.

7. Cultural and organisational issues

7.1 Raising Institutional awareness

- Utilised the University's Internal Communications Network (a group that discusses ways in which information flow and communication can be improved *within* the University)
- Project endorsed by the University's Steering Committee and overseen by a project group under the aegis of the Business Systems Steering Group
- Addressed a Data Protection seminar for the University's HR and Payroll staff
- Use archive contacts: use and expand existing networks
- Records management website
- Through surveying process and meetings with departments/staff

7.2 Institutional support

- Warwick Drivers: FoI, lack of space, strategic goals, organisational change (the move of the administration to a new building), technical change (consideration of an EDMS, the devolution of responsibilities relating to web sites and electronic information), risk management (disaster planning, preservation, compliance)
- Expression: Senior management support, committee endorsement and /oversight The project director was the Director of Personnel and the team included the Deputy Director of IT Services, the Librarian, Data Protection Officer and a senior Systems Analyst. The project was endorsed by the Registrar, University Steering Committee and the Business Systems Steering Group of the Information Technology Policy Committee.
- Related Issues: Managing expectations, getting staff involved (carrots - harness people's interests, sell benefits; sticks – senior management wrath), permission to take staff time

7.3 Buy-in

Departmental buy-in remains the most difficult aspect of a project like this. It is not only about engaging staff interest and time. Another aspect was reconciling staff's different concepts of and approaches to the records and different professional specialisms (e.g. HR and records management). The key to both is communication and a communications strategy should perhaps be considered at the very first stages of the project. Working from the top down, gaining management support, is crucial but the gap between having a mandate and realising active support 'on the ground' should be recognised. While our project has tried to raise institutional awareness throughout, it was also found useful to present departments with specifics. An institutional survey gained some good results from many departments and where responses were partial or unclear the survey provided a reason for follow-up. The draft schedules created using this and the other information collated were used to present information to departmental administrators/heads which they could then add to/comment on. Not only did this stimulate some discussion and present them with an interest/stake in the exercise but it made explanations as to what the project and schedule were trying to achieve easier and less 'abstract'. Targeted follow-up ensured that the impact on departments was mitigated as far as possible.

7.4 Raising awareness of electronic/digital issues

Opportunity to get people to recognise that requirements don't just apply to central paper records, but records on their PCs, shared drives and in email mailboxes. The project

highlighted the need to manage the application of retention and preservation requirements on a variety of electronic resources and the relationship between digital records and paper printouts/surrogates (and for these to be managed in relation to each other). The attempt to manage duplicates can be seen in the schedule and adds to the debate about what a retention period actually stands for. The practical application of periods to some electronic records is trickier still and, while some situations can be improved by what is or is not recorded electronically, or the definition of their status as active records or records for historical/statistical reference (if supported by clear procedures), in the case of many systems retentions cannot be instantly implemented. Awareness of retention requirements, however, can be achieved and the need for future facilities to implement disposition/preservation actions recognised.

8. Wider Integration of the Schedule and FAM

- 8.1 The schedule falls under a RM policy that establishes responsibilities and will encompass a range of policies and guidance. Working on the schedule has made the scope and role of further guidance/training clearer and brought issues such as digital preservation and managing records in devolved and hybrid systems to the fore. It has advanced institutional understanding and provided important experience and the tools to build on the project outputs, establish a rounded RM programme and that also helps address immediate issues such as the administration's move to another building and preparation for FOI.
- 8.2 The retention schedule provides scope to bring together policies relating to the transfer and disposition of records, but the project has shown that it should always be part of a wider framework of policies, guidance and resources necessary for its successful implementation. The means to record retention decisions, disposal actions, the role of archival appraisal, information security, Data Protection policy are all wider but integral issues. More than a raft of policies, staff training and raising awareness are key issues for consideration as is the mechanism by which records/information management is considered in the University's decision-making structures. These issues are a real consideration given the use of the FAM and the fact that it is not always easy to map sections of a schedule to hierarchical departmental structures.
- 8.3 Re-enforcing the theme that the RRS and FAM should not be created or used in isolation, or be static documents that don't fulfil their potential, the project explored the means of promoting their integration within the University and its systems.
- 8.4 The principal aim was to identify the means to bring together and provide access to a key range of information/management resources (policies, procedures, catalogues, forms, documents) in a way useful to both internal and external users.
- Web-based approach: dynamic schedule
 - Raising awareness: RM identity
 - Improve access to information, ability to search, less static
 - University website is using a functional approach in creating a basic structure in the organisation of its pages. A functional approach has also been used for certain reporting documents. These developments will help tie-in with the FoI publication scheme and demonstrate the wider application of a functional approach)
 - Content Management System (for in-house creation of web pages)
 - Metadata – potential for FAM to provide controlled access terms
 - Structured pages – hierarchical presentation of pages
 - 'Portals' aid functional/tailored approach to information
 - Management of pages (gives page owners, owners notified of changes and when page out of date, tailored viewing and editing permissions; not yet automatic archiving/destruction)
 - Encoded Archival Description (EAD)
Like the CMS, EAD allows the application of metadata finding aids to improve the retrieval of information by internal and external users could help integrate documents and their management information and make information management more visible.
 - Digitisation (need for business process and retention requirements to lead development, role of metadata, functional versus hierarchical structures)
 - Place of records management in the committee structure: means by which pan institutional or thematic issues are catered for within hierarchical structures, mechanisms by which detailed documents are debated and endorsed

- Digital Preservation: a bigger issue but the retention schedule is an important first step to realising and dealing with it.
 - Preservation of databases, webpages, electronic forms
 - Retention and deletion of data on systems and databases
- Archival selection criteria
 - Guidance to aid reviews but also open and consistent criteria for archivist.
 - Schedule to prompt reviews

References

Data Protection

Data Protection and Freedom of Information: <http://www.dataprotection.gov.uk/>

OIC Codes of Practice: <http://www.dataprotection.gov.uk/dpr/dpdoc.nsf>

Surveying and Retention Scheduling

HE/FE Records Management Group (including examples of policies, schedules from HE and FE institutions and relevant links) <http://internal.bath.ac.uk/records-mgmt/urmgrou/retention-schedules.htm>

JISC Records Retention Schedule (http://www.jisc.ac.uk/index.cfm?name=srl_structure)

PRO Guidance and Standards (including retention schedule for HR records, advice on surveying, retention and disposal scheduling, electronic records):
<http://www.pro.gov.uk/recordsmanagement/standards/default.htm#2>

E. Shepherd and G. Yeo, *Managing Records: a handbook of principles and practice* (London, 2003)

Function and Activity Models

GASHE www.gashe.ac.uk

Inter Pares Project (<http://www.interpares.org/book/index.htm>, www.idef.com,
<http://www.stsc.hill.af.mil/crosstalk/frames.asp?uri=1995/06/IDEF.asp>, www.interpares.org)

JISC HEI Business Function and Activity Model
(http://www.jisc.ac.uk/index.cfm?name=srl_structure)

Appendices

1. Project Plan (provides further breakdown of methodology, project aims and management)
2. Survey form/questions
3. Example of FAM terms as metadata in EAD and HTML documents