

# Information Management Assessment

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A review of good practice from the IMA programme, 2008-16

Section 5: Records, review and transfer

Working with government  
to raise standards in  
information management

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**Note:** references are to the named individuals, roles and organisations as they operated at the time of the Information Management Assessment or progress review

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## 1. Oversight of records and selection

IMA Goal: The organisation understands the value of its records and can consistently identify those with enduring historical value.

### Position of the DRO

The National Archives' Keeper and CEO is ultimately responsible for the supervision of government departments in the selection and safe-keeping of records, as required under the Public Records Act.

Within government organisations, the Departmental Records Officer (DRO) has lead responsibility for compliance with the Public Records Act. DROs ensure all information is managed from the point of creation until it is either destroyed or selected for permanent preservation and transferred to The National Archives or an alternative place of deposit.

Key requirements for a successful DRO include the establishment of good working relationships with stakeholders and the adoption of an active role in raising risks and championing good practice.<sup>1</sup>

### Foreign & Commonwealth Office (FCO), 2014 IMA reassessment

The FCO Departmental Records Officer was the Head of Knowledge within the Knowledge and Technology Directorate (KTD) and sat on the Directorate's management team. The IMA report noted:

'The DRO has a direct reporting line to the Senior Information Risk Owner and Chief Information Officer. The DRO is also the Knowledge Excellence Director and is recognised to have adopted an active role in steering the programme since joining the Directorate. The DRO is also a standing member of the Knowledge Excellence Committee (KEC). This is a good practice arrangement that has the potential to give the right level of priority to information and records management objectives and to support clear and direct communication of related risks.'

<sup>1</sup> [nationalarchives.gov.uk/information-management/manage-information/planning/departmental-record-officer/role-departmental-record-officer/](http://nationalarchives.gov.uk/information-management/manage-information/planning/departmental-record-officer/role-departmental-record-officer/)

### **Home Office, 2015 IMA**

A new KIM team was in place at Home Office under a Senior Civil Service-level Departmental Records Officer. The IMA report noted:

‘The DRO is well-placed to exert influence on wider KIM issues, escalate risks and highlight issues and has been active in doing so. The DRO reports into the Director of Performance and Risk who, in turn, reports to the Chief Operating Officer and Senior Information Risk Owner.’

### **Oversight, appraisal and selection**

Information will possess different values to an organisation, which will affect how long it needs to be kept. As well as having business value, it may also have historical value to the organisation and wider society:

‘This can include “evidential” value derived from the way the record documented the history, structure and functions of an organisation, and “informational” value in providing research material on persons, places and subjects. Select records for permanent preservation which show the significance of the functions and activities of departments, and which provide information relevant to themes outlined in The National Archives’ Records collection policy. These records tend to include high level policy or complex case files.<sup>2</sup>

Appraisal is the process of distinguishing information with continuing value from information that is of no further value. The National Archives steers, advises and supports government departments in the management of their information throughout its life-cycle, and advises on the selection of records (paper and digital) for transfer to The National Archives for permanent preservation. Key tools that departments can use to identify historical value include Official Selection Policies (OSPs) and appraisal reports.

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<sup>2</sup> [nationalarchives.gov.uk/documents/information-management/what-is-appraisal.pdf](https://nationalarchives.gov.uk/documents/information-management/what-is-appraisal.pdf)

Our assessments consider whether organisations have oversight of the information they hold in all formats and whether the right processes are in place to enable identification of historical value.<sup>3</sup>

#### **Department for Work and Pensions (DWP), 2015 IMA**

A team of four staff at DWP was responsible for the appraisal, selection, sensitivity review and preparation of files for transfer. The team worked on all stages of the process rather than just one area, which helps to ensure knowledge transfer. The IMA report noted:

‘The team are experienced in appraisal and have built up a good knowledge of the history of DWP which helps them to make well-informed decisions on what to select for permanent preservation. There are clear criteria and guidance for reviewers on selection and DWP also has an Operational Selection Policy. The review team are employing macro appraisal techniques in line with The National Archives’ guidance and, where possible, complete Series Level Appraisal Questionnaires (SLAQs) for file series in order to understand what type of records the series contains. Once these are approved these are used to “sift” out files of no value for destruction. They carry out spot checks to ensure that they are not getting rid of anything of value. The National Archives Information Management Consultant (IMC) has been able to approve reviews without need for regular rechecking.’

#### **Ministry of Justice (MoJ), 2016 IMA reassessment**

MoJ had developed a process for appraisal and selection of digital records on its EDRMs TRIM. The IMA reassessment report noted that work on this began in 2014:

‘File by file review was tested, but proved to be too labour-intensive for digital records, so MoJ is taking a macro approach to reviewing at level

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<sup>3</sup> [nationalarchives.gov.uk/information-management/manage-information/ima/](http://nationalarchives.gov.uk/information-management/manage-information/ima/)

3 in TRIM. According to the review team, file titling in TRIM is quite good but what staff actually file in containers can vary, so checks are required. Reviewers have a target of reviewing around 100 files a day. As experience of reviewing digital records grows, reviewers are noting patterns – such as areas where they have not selected anything for the last two years – that will aid selection in the future. Once records have been identified for selection, the file path is exported from TRIM onto a spreadsheet and review comments are added. The National Archives' IMC has access to a TRIM account and can access the spreadsheet to make comments/sign off decisions. MoJ has reviewed records in TRIM up to 2014 and around 5,000 folders have been identified and marked for transfer to The National Archives.'

MOJ planned to apply the same approach to appraisal and selection in its new SharePoint based IT system, JustStore.

## 2. Implementing disposal decisions

IMA Goal: The organisation understands the process for records disposal and consistently implements decisions in line with defined plans.

### Disposing of information

Organisations cannot hold information indefinitely.<sup>4</sup> The IMA lessons learned report notes:

‘Understanding what information to keep and disposing of information when you no longer need it leads to business efficiency, decreased storage, maintenance and presentation costs and compliance with information legislation.’<sup>5</sup>

Information in all formats that no longer has value should be destroyed, while information that has been selected for permanent preservation should be transferred to The National Archives or an alternative place of deposit. This applies equally to information in paper and digital formats. The processes organisations put in place should support routine, value-based decisions and provide a clear audit trail.

Organisations must ensure that disposal is possible within IT systems and that retention periods are defined and routinely applied. An organisation’s approach should cover both current and legacy systems.

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<sup>4</sup> Where departments have put disposal activities on hold, for example to meet the requirements of the Independent Inquiry into Child Sex Abuse (IICSA), a plan should be in place to restart them at an appropriate point in the future.

<sup>5</sup> [nationalarchives.gov.uk/information-management/manage-information/ima/ima-reports-action-plans/](https://nationalarchives.gov.uk/information-management/manage-information/ima/ima-reports-action-plans/)

### **Department of Health, 2014 IMA**

Both the Department of Health's legacy MEDS IT system and its current SharePoint-based Information Workspace Solution, IWS, supported the automated setting of retention periods and disposal of information. The IMA report noted:

'The department has applied retention periods to MEDS and is actively disposing of records once their retention period has ended. The Departmental Records Officer is responsible for activating disposal on a regular basis ... A total of 76,000 documents held on MEDS were destroyed [in the last year], with destruction due to be undertaken on a further volume of records once requests for information to support statutory inquiries and reviews have been completed. Within IWS, a trigger date is added to folders to activate disposal; this is the responsibility of the Local Folder Manager network.'

### **The National Archives, 2011 IMA**

We assessed our own organisation in 2011. The IMA report highlighted The National Archives' 2010 'What to Keep' (WTK) exercise, conducted to identify information assets and establish retention schedules. The KIM team had worked to apply these to its file plan:

'At the time of the assessment, the KIM team had started closing folders in the file plan to implement the disposal periods identified in WTK schedules.'

### **Ministry of Justice (MoJ), 2016 IMA reassessment**

MoJ had put in place processes to ensure that disposal of paper files was carried out in line with the agreed retention and disposition schedules. There was an annual destruction exercise each January. Requirements relating to existing disposal schedules had been factored into the move to MoJ's new IT system, JustStore. The IMA report noted:

'This work is carried out by the RMS team, including staff at the

Branston Registry and at TNT. Disposal is largely on hold at the moment due to the requirements of the Independent Inquiry into Child Sexual Abuse (IICSA) ... TNT staff have been trained to seek out files that are unlikely to have relevance to IICSA. These files are then checked, listed, and the Branston Registry team signs off destruction. One member of the RMS team has been assigned the role of single point of contact for the IICSA.

'MoJ has applied retention periods to TRIM and a process is in place for enacting these. Retention and disposal instructions will be transferred to Just Store when information from TRIM is migrated.'

### **Sensitivity review, transfer and planning**

Government organisations preparing records for transfer to The National Archives should review the access requirements of those records. The purpose of this review is to identify material that:

- should be retained, as the records are too sensitive for transfer to The National Archives
- should be transferred to The National Archives as closed, as Freedom of Information (FOI) exemptions apply
- can be transferred to The National Archives as open, as no FOI exemptions apply.

The sensitivity review and transfer of digital records represents a new challenge for government departments, as noted in National Archives' *Information Landscape in Government 2014-15* report. This stated that in 2016, 12 departments were expected to transfer digital records; by the end of the 20-year rule transition period this is expected to grow to an approximate total of 50.<sup>6</sup>

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<sup>6</sup> [nationalarchives.gov.uk/information-management/manage-information/policy-process/reviewing-digital-records-management-government/research/](http://nationalarchives.gov.uk/information-management/manage-information/policy-process/reviewing-digital-records-management-government/research/)

We consider whether departments have effective processes in place for sensitivity review and also consider whether they are actively planning to meet their transfer obligations and use available resources appropriately.

### **Welsh Government, 2016 IMA progress review**

The Welsh Government was a key participant in The National Archives' Digital Transfer Project pilots. These pilots tested processes for appraisal, selection, sensitivity review and transfer of digital records. The progress review noted:

'Welsh language policy records, encompassing the records of the Welsh Language Board and the Welsh Government and its predecessors, were chosen for the pilot transfer. Records were selected at a high level in reference to Welsh Government's Official Selection Policy, supported by a range of other approaches including keyword searches and searches "by creator", "by time" and "by document type".

'The selected series contained digital records, held on both iShare and the shared drives, and also included legacy paper files brought over to Welsh Government following the Welsh Language Board merger in 2012. Welsh Government adopted a file-by-file approach to sensitivity review, with one member of staff conducting sensitivity reviews for 17 paper files and 239 digital files over a period of three weeks. A different approach is being employed for Welsh Government's second transfer of digital records: this will consist of the records of the 2012 Olympics in Wales and the 2010 Ryder Cup.

Welsh Government demonstrated a willingness to engage, test The National Archives' processes and experiment throughout the project ... Records were transferred in February 2015 and are now stored in series WA 11, 12 and 13. This marks the first formal digital transfer of public records to The National Archives and we note that the project benefited from Welsh Government's participation and input.'

### **HM Treasury, 2015 IMA reassessment**

We saw good evidence that HM Treasury recognised the importance of fulfilling its obligations under the Public Records Act. There was a specific goal in HM Treasury's Information Workplace Solutions (IWS) strategy:

‘To ensure statutory compliance, notably with the Public Records Act which requires both good records management and the preservation of historic Treasury archives’

The IWS strategy cited the move from the 30 to a 20-year rule and The National Archives' Digital Transfer programme as drivers for this. Although HM Treasury was behind in terms of the transition to the 20-year rule, it had devised a plan to address this. The IMA report noted:

‘A paper was brought to the Advisory Council (AC) in February 2015 explaining that the transfer programme had fallen behind schedule; that the department is unlikely to catch up fully before 2023; and that they are setting out a plan for transfer. A further paper was presented to the AC in May 2015 detailing the work that HMT had done since then to:

- Revise the transfer plan to include details of the number of files in scope in each category, for each year.
- Further refine the delivery model by working with suppliers to find a way of resourcing transfer activity that balances the need for a good-quality service with the imperative of delivering it in a cost-effective way. The department is confident that it has a sustainable approach.
- Engage with the research community by involving historians in the archive selection approach and transfer priorities, and holding a transfer workshop with senior academics, jointly facilitated by HM Treasury, The National Archives and the Institute for Government.’