CA03-2021 – Records Management

Audit Opinion	**Limited**
Prospects for Improvement	**Good**

The audit opinion of Limited is based on Internal Audit's findings from a review of the current processes, interviews with key members of staff and a staff survey. Overall, it is concluded that sufficient guidance, training and bespoke advice is available. However, there are a number of important areas where processes and organisational awareness, understanding and compliance require improvement.

Key Strengths
- Relevant policies and procedures, including the Data Protection Policy, Records Management Policy, and the Information Management Manual (IMM) were assessed and confirmed to be comprehensive, up-to-date and the latest versions are available to officers. The IMM is under review with an action plan that documents the required outcomes.
- Policies and procedures clearly outline corporate and service responsibilities and arrangements for record classification, storage, security, transmission and disposal.
- An organisational Information Asset Register (IAR) is in place and includes the main category requirements. However, there are important issues to be addressed, which are explained below (see Issue 4 below).
- A staff survey conducted as part of the audit identified that there is a high level of awareness (90%) that the overall responsibility for records management sits with all staff within the organisation.
- A Data Retention Schedule is in place and is consistent with the Information Asset Register. The use of a unique identifier in the IAR and Retention Schedule ensure that when a change is made to the database for one record, there is an automatic update to the other. However, there are important issues to be addressed, which are explained below.
- The contract for external archiving and retrieval of historic records is managed through a set of key performance indicators, for which there has been a high rate of compliance since the contract began in 2017.
- There is a clear process for paper record destruction and disposal by the Records Management Service.

Areas for Development
- An e-learning training module for Records Management is available to all staff; however, completion is not mandatory and is not monitored. The staff survey conducted as part of the audit identified a low level of completion, and a low level of awareness of the main components of the control framework.
- There is reduced assurance that the Information Asset Register is fully up to date due to restructures across the organisation, which may have resulted in unforeseen gaps.
- A programme of information audits (and the necessary level of resource to deliver it) is required, to conduct a full Information Asset Register review and give assurance that all assets are known, recorded and subject to appropriate controls and oversight.
- Processes to ensure the Data Retention Schedule remains up to date are reliant on the Records Manager being advised either a) of a new record type usually via a query from a service, or b) via the information audit process. There is reduced assurance that the Data Retention Schedule is fully up to date.
- The Data Retention Schedule is not sufficiently detailed to identify when specific records are due for retention or disposal review. The process is manual, and responsibility sits with services, although in practice, some do not have suitable processes or environments to identify when records have reached their retention deadline.
- There are three current cases of records required for a statutory request having gone missing and audit trails of their transmission have not been maintained. Furthermore, there is no clearly communicated policy on the specific process that staff should follow if a historic file requested via a statutory process cannot be located by the Records Management Service.
- ICT controls to be introduced with the implementation of SharePoint will vastly improve the Authority's ability to classify and manage electronic records but will require significant input and support from the Records Manager to issue guidance and provide training. The realisation of security benefits will also rely heavily on compliance by services.
- The substantial increase in storage capacity for electronic records that will come with SharePoint must be accompanied by organisation-wide training and guidance, to drive good file management behaviours and avoid the potential for relaxation of disciplines.

- The Records Manager has a high level of expertise and is a subject matter expert, who is able to identify strategic actions required and is available to advise on all information governance queries.
- There is a governance structure in place for the management of records, via a Cross Directorate and a Corporate Information Governance Group.

Prospects for Improvement

Our overall opinion of Uncertain for Prospects for Improvement is based on the following:

The Records Manager has a clear and complete understanding of where organisational process gaps and weaknesses exist. However, aside from her attendance at the Cross Directorate Information Governance Group where she will report concerns, she has no line management route for implementing the required improvements to Records Management Service processes, limited authority to drive other cross-authority changes and also insufficient capacity.

Summary of Management Responses

	No. of Issues Raised	Mgt Action Plan Developed	Risk Accepted and No Action Proposed
High Risk	3	3	N/A
Med Risk	4	4	N/A
Low Risk	0	0	N/A