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Archives & Records
Association
UK & Ireland

CONFERENCE

2018

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Welcome to ARC Magazine September 2017

Are records managers the unsung heroes of the record keeping profession? Reading through this month's articles I think there is a strong case to be made to say that they are. Look at those archivists, getting all the credit for discoveries made in the reading room (if only!); or the conservators, medics of our profession, saving documents from disintegration. But what about the records managers? When a records manager does their job well they can be largely invisible as retention schedules and policies keep things running smoothly within an organisation. Yet without good records management the archives of the future will be incomplete or so full of unimportant documentation that they become unmanageable for the archivist and the researcher alike. And that's not to mention the cost to a business when something goes wrong and information is lost or mishandled.

The skills required by a records manager to be successful are almost as varied as the articles in this issue - from excellent communication and IT skills to an ability to apply new legislation and guidance to real-life situations. Whether it's also necessary to have a bit of the 'jungle animal' in a records manager's personality is something that you can decide for yourselves - and you'll just have to read on to know what that means. My thanks go to everyone who has contributed an article and particularly to Natalya Kusel and Jason King for co-ordinating the content.

Enjoy the issue!

Richard Wragg
ARC Editor



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Front cover: The EU's data protection regime has been updated for the digital age; public domain (CC0 1.0)

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opening lines



The UK Government recently released a Statement of Intent setting out their plans to introduce a Data Protection (DP) Bill to Parliament in September based on the EU General Data Protection Regulation (GDPR), which comes into force in May 2018. They have also provided some detail about the derogations they plan to legislate for.

We will all need to wait for the detail of the Bill text to understand exactly what the implications might be, but there are some key points to highlight.

The DP Bill will introduce derogations for all that are permitted by the GDPR. The UK Government also plans to mirror as closely as possible the structure of existing UK data protection law, which will aim to provide research organisations with a similar degree of flexibility as they currently have under the 1998 Act.

The derogations will base the definition of 'public authorities' on that set out in the Freedom of Information Act (2000). This means that universities will fall under the definition of public authorities and therefore may not be able to use 'legitimate interests' (Article 6(1)(f)) as a legal basis for processing personal data, at least for some of their tasks. It will therefore be important to make sure that universities can rely on 'public interest', as a legal basis as an alternative to consent.

The derogations relating to research should enable research to be exempt from some of the data subject rights required by GDPR (including data access rights, the right to rectification, restriction of processing and the right to object), provided that adequate safeguards are in place. The Regulation does include new rules that researchers will need to follow, for example around increasing accountability and transparency. Researchers and research organisations will need to keep good records about their data processing activities and be clear on the legal basis they have for processing personal data.

A new offence will be created relating to re-identifying anonymised or pseudonymised data. The offence will not carry a custodial sentence but will be 'recordable', i.e. will create a criminal record on the Police National Computer. Once the Data Protection Bill text is released, Wellcome will commission some legal analysis to fully understand the implications for research and to identify any gaps or loopholes that may affect research. Depending on the timing of the Bill, we expect this to be undertaken by early October and will share any pertinent findings with colleagues in the ARA and elsewhere.

Separately, the Health Research Authority (HRA) is in the process of developing guidance for researchers on their duties under GDPR and how to ensure researchers and research organisations are in compliance. We expect the HRA to announce further details soon on what this guidance will cover.

Natalie Banner

Wellcome Trust

Continuing Professional Development (CPD) News (Incorporating Registration News)

I was pleased to have launched the new CPD framework at the Annual Conference last month. It was my first attendance at the annual conference, and I enjoyed meeting members and discussing the issues that impact on them in the workplace. In particular, their professional development.

I invite you to take a look at the main article on CPD in the immediately following pages. In it, I reflect on the insights I gained from conversations at Conference and how they will help shape our constantly-evolving approach to CPD.

Professional development is a vital part of our professional lives, yet it is often misunderstood. Over the coming months I will be out and about in your regions and meeting you in your sections to discuss what CPD can do for you, aspects of the ARA's new competency framework and assessment processes, and share the feedback, comments and enquiries that I am getting from you, the members.

Chris Sheridan

ARA CPD Programme Manager

Registration

This column marks the end of Registration News. In January 2015 we first started the countdown to the final submission deadline. Back then, candidates on the "existing Registration Scheme" had 33 months in which to submit their portfolio for assessment. Now, the existing scheme has become the old scheme and there is one month to go before the final deadline of 1 October 2017 - less perhaps, depending on when you are reading this. Hopefully by now you will have decided whether or not to submit under the old scheme or transfer to the new. Whatever your decision, the Registration Scheme Sub-committee wish you good luck. Though please don't forget, we're still here to answer questions, particularly in the run-up to the final round of assessments.

Of course, Registration will still exist; it has just become part of a more comprehensive CPD programme. Please do get involved, whether that's by transferring to the new scheme, enrolling for the first time or by thinking about your on-going CPD and the re-validation process. Given below are the names of the newly registered members of ARA (and their mentors). Hopefully they will motivate some of you to jump the final hurdle and submit an 'old-style' portfolio by 1 October. Registration News will make a brief

reappearance to announce the successful applicants from the autumn assessment round. However, in the meantime and on behalf of the Registration Scheme Sub-committee, thanks for reading!

Newly registered members of the Archives and Records Association

Following the spring 2017 assessment round of portfolios submitted to the assessors, the successful candidates are as follows:

[Susan Gentles](#)

HSBC Global Functions Corporate Archivist

[Katy Johnson](#)

Archivist, Aberdeen City and Aberdeenshire Archives

[Ben White](#)

Archivist (Collections), Bank of England Archive

[Richard Wragg](#)

Archivist, The National Gallery

[Michael Gallagher](#)

Archivist, Glasgow City Archives

[Diane Hodgson](#)

Archivist, Hertfordshire County Council

[Arike Oke](#)

Archivist, Wellcome Trust

[Kelda Roe](#)

Collections Manager, Mountain Heritage Trust

[Kate Watson](#)

Information Governance Officer, Dorset Councils Partnership

[Andrew Young](#)

Records Manager, Doncaster Metropolitan Borough Council

[Lisa Greenhalgh](#)

Senior Archivist, Cheshire Archives and Local Studies

[Keri Nicholson](#)

Archivist, Lancashire Archives

[Mark Smith](#)

Archivist, Derbyshire Record Office

[Michelle Alexander](#)

Records Manager, University of Liverpool

[Michael Stephens](#)

Archivist, Cumbria Archive Centre

[Rebecca Somerset](#)

Province Archivist, Jesuits in Britain

The committee would like to congratulate the newly registered members on their success.

We would also like to acknowledge the efforts of the successful candidates' mentors:

[Eleanor Gawne](#) (Architectural Association)
[Ruairadh Wishart](#) (Aberdeen City and Aberdeenshire Archives)
[Richard Wiltshire](#) (London Metropolitan Archives)
[Clare Brown](#) (Lambeth Palace Library)
[Lyn Crawford](#) (RBS Archives)
[Susan Flood](#) (Retired)
[Helen Fisher](#) (Cadbury Research Library, University of Birmingham)
[Vicky Rea](#) (Birkbeck, University of London)
[Margaret Crockett](#) (Archives and Records Management Consultant)
[Jane Stevenson](#) (Archives Hub, JISC)
[Louise Ray](#) (Archives and Records Management Consultant)
[Joanne Fitton](#) (University of Leeds)
[Larysa Bolton](#) (Manchester Central Library)
[Jeanette Ovenden](#) (Leicestershire Record Office)
[Jacquie Crosby](#) (Lancashire Archives)
[Robert Baxter](#) (Whitehaven Archive & Local Studies Centre),
[Mary McHugh](#) (Archdiocese of Glasgow).

The committee would like to thank them for the time and support they have given to their candidates.

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Richard Wragg

Communications Officer, Registration Scheme

“Don't forget: Candidates have 1 month to submit their portfolio under the existing Registration Scheme.”

Collecting Matters

How to nudge your way to better information management!

Ask anyone who has tried a new diet or exercise regime and they'll tell you that changing their own behaviour is a challenge - so what about changing other people's behaviours?

Good information management requires an improvement in information culture - the way people do things; the way people talk and share information; the importance placed on the rules and policies; as well as the way that senior management treat and value information.

'Behaviour change' initiatives can be started at any time but a technology change can be a great driver towards implementation. As part of the Cross-Government Records Management Project, The National Archives together with the Cabinet Office have produced a Behaviour Change Toolkit to help government departments nudge people into better information management.

The Behaviour Change Toolkit has its foundation in the EAST framework which was developed by 10 Downing Street's 'nudge' unit. This framework suggests that if you want to encourage a behaviour then make it Easy, Attractive, Social and Timely.

Consequently, the Behaviour Change Toolkit brings together some simple guides, tools and specific examples used across government to help apply behaviour change techniques and improve information management behaviours.

The Toolkit has been published on the Government Knowledge and Information Management Profession group on Knowledge Hub (<https://khub.net>). Knowledge Hub is a UK-hosted digital collaboration platform with over 100,000 members from public sector organisations forming over 1500 online groups across 1500 organisations.

It can be used as a professional network and social hub as well as a platform to facilitate online training and share guidance.

Lucie Jordan

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A basic guide to ARA's new CPD programme: part six

CPD and You

We had over 700 responses from members to last year's CPD survey. I'm told that it was something of a record. That told us how much members are engaged with their own professional development. At the same time, there was a small minority that seemed to see it as something that is somehow separate from their everyday 'professional' lives.

Getting Started

So, how best to look at CPD? Well, it became clear from conversations I had with members before and during the recent ARA annual Conference, that there is nothing like a reminder of the basics, when getting started.

• What is CPD?

Continuing professional development (CPD) is an ongoing process of learning/development and reflection, which professionals use to maintain and develop their skills and knowledge throughout their careers. It is applicable to everyone at every stage of their career, from your first day as a novice to the day before you end your engagement with the sector.

So if you don't see it as intrinsic to your professional life, you may be looking at it the wrong way. We can help you get orientated and explain why CPD may be different from what you are used to.

The first step is to set your own learning objectives, based on your personal and professional needs, and undertake any training or seek the work-place experience required to achieve those objectives.



ARA Conference 2015 Drinks reception at the Royal College of Physicians. Photograph copyright Carrie Davenport for the ARA.

• Setting your learning objectives

First up, it is YOUR CPD, not someone else's. Your CPD does not belong to an employer: you do not need to tie your CPD narrowly to your current work or study environment. It is a good idea to start by thinking strategically about your current and future development needs and career goals, and review them regularly. For example, ask yourself: where would I like to be to be in five years? Your journey may end up somewhere very different, but you can seek CPD-relevant experience, training and qualifications on anything in the record-keeping sector at any time. As your priorities change and evolve, so should your CPD.

If you are employed, then most employers operate some form of appraisal system, where your objectives, performance, development and training

needs will often be discussed, identified and agreed (if your employer is doing it the right way!). This may provide opportunities to develop new skills, or new responsibilities. At the same time, if you are considering options to improve your chances of promotion, a sideways move to a different role or moving to a new employer, you can tailor your CPD to those ends, too, by pursuing CPD options outside those agreed in the workplace.

This situation applies to all employed members regardless of their level of experience or seniority: CPD helps you take control of your career and position yourself for roles and opportunities that you seek or capitalise on any that come along.

Of course, CPD is not just for the 'conventionally' employed. Self-

What counts as CPD?

The ARA is not prescriptive about the types of activity that count as CPD, recognising that members are best placed to assess the value of activity with their own professional development. We are happy to offer advice and support for those less familiar.

However, you must demonstrate that whatever you record as part of your CPD leads to a clear, measurable outcome (eg, some improvement, something done better, some result achieved).

So, when considering whether an activity counts as CPD you should ask yourself whether it has helped you meet any learning objectives that you have previously identified. For example an objective to *'improve my understanding of digitisation of records'* can be met in a number of ways, such as training courses/workshops, networking with other members (or service providers) and personal research. But you will need evidence of your 'improvement'. Simply attending a course does not count. You must show what outcome you achieved by attending the course. That is one way in which CPD is different from the 'course-driven' approach to development used in the past.

If your activity has helped you meet your objective, then include it in a competency write-up, clearly explaining what you've learned and how you will apply this knowledge/learning going forward. Your watchwords in all this should be evidence, evidence, evidence...

employed members, such those who run their own business, can use CPD to inform their business development, and vice-versa. For example, identifying new business opportunities and considering what training and development may be required to exploit those opportunities.

Members on short-term contracts may not benefit from employer support with their professional development but – by using their CPD – can actually use the transitional nature of some contract work with various different employers to their advantage. The same applies to volunteers, part-time workers or those returning from career breaks: CPD is not just gained though attending events or training courses and enables you to level up the playing field.

• Why is CPD important?

In today's world of work, 'employability' is everything. The world of work is competitive. Employers and clients increasingly

look for multi-skilled professionals. And if you are not in the formal world of work, eg a volunteer or an intern, you will still want to grow in whatever role you take on and be the best you can be. Your participation in CPD enables you to do this.

CPD is also reassuring and a way of coping with change. Technology is driving change at a pace that at times can feel uncomfortable, but CPD can help members take out the fear and anticipate change and identify their learning needs. By maintain their professional development, members can ensure their skills and knowledge are current, giving them a competitive edge in the job market or keep in touch if they take a career break.

The rewards for your professional development

ARA CPD offers professional qualifications with three separate post-nominals that successful candidates may use to demonstrate their professional 'level'. In addition

to an updated Registration level - ARA CPD is introducing two new levels: Foundation and Fellowship. This now means that all record keeping professionals, semi-professionals and volunteers can work towards the Foundation, Registered or Fellowship qualification – either in sequence throughout a career or focusing solely on one.

Chartered institutes and similar professional associations, such as the ARA, offer professional qualifications. I know that this may cause confusion for a while among some members that are used to referring to their academic degree as a 'professional qualification'.

The ARA will also continue to accredit excellent courses run by universities in the UK and Ireland, with their highly-regarded academic qualifications. Having an academic degree may help you progress to Registration level under ARA CPD more quickly than you would otherwise. However, at the same time, if you are a school leaver or apprentice, ARA CPD offers an alternative means to gaining recognised qualifications.

So, whoever you are and however you got involved in the wonderful world of archiving, records management or conservation, you can take control of your professional development through ARA CPD and demonstrate to employers, clients, fellow workers or volunteers and the public that you have accredited competence as a professional.

Chris Sheridan

ARA CPD Programme Manager

ICA Congress 2016

Last year Ian Wakeling received an Archives and Records Association International Bursary to attend the 2016 International Council on Archives Congress in Seoul, South Korea. Here is his report.

In October 2015 the city government of Seoul chose a new logo - I.Seoul.U - seeking to revamp its brand image to show “the ever-changing vibrant and dynamic image of Seoul that we need to build”. For Seoul one can also read South Korea, a relatively young republic nation with an ancient history, that has sought to blend cultural tradition with rapid industrialisation and economic growth since the 1980s, giving new reality to the idea of the digital economy, in turn creating household names such as Hyundai, Kia, Samsung and LG Electronics. This techno-traditional setting provided an excellent analogy for archives in the first quarter of the 21st century and a splendid backdrop to the International Council on Archives Congress 2016 that took place 5-10 September. The Congress delivered 209 presentations and 12 workshops from archivists around the world.

Two of the Congress’ perhaps most striking themes were, on the one hand, an awareness of the power and the sheer scale of the digital information universe that archivists have to confront now and in the future; and the importance of archives in documenting social, humanitarian and political justice on the other - archives being the tool that helps ensure accountability and transparency, together with the defence of civil society and democracy. In Seoul it became apparent that this century’s challenge is how to reconcile the two. Firstly to cope with the kaleidoscope of fast moving information avalanches that mix fact, figures, post-truth and a Gordian knot of protagonists and opinions. Secondly, in-line with the UNESCO Universal Declaration on Archives, the recognition that archives are authoritative sources that will safeguard the memory of individuals, communities and societies and have an important role to play in documenting and challenging injustice, so promoting social, political, civil, environmental, gender and family rights.

A tranche of powerful presentations addressed this second area, focusing on the role of archives in the creation of Truth and Evidence Commissions. Significant in all of

these was the legitimacy given to ‘truth’ processes by post-regime governments and organisations who set out to systematically collect and analyse evidence from victims and perpetrators, subsequently ensuring that independent archives were created to both protect and ensure the effective understanding and retrieval of information.

Three presentations (out of many) offered stark examples of evidence commissions at work. Monica Tenaglia, University of Brasilia, discussed the revelation and documentation of the systematic violations of human rights of the Brazilian Civil-Military Dictatorship between 1964-1985 that covered the five governments of the generals, including General Costa e Silva’s hard-line regime between 1967-1969. This was a regime that suspended habeas corpus and passed a National Security Law in 1969 that defined crimes against the regime’s ‘political and social order’. Throughout these regimes thousands of people were arrested, detained, tortured and many lost their lives. The presentation focused on the arrest and murder of the journalist Vladimir Herzog in an army centre in 1975, who was alleged to have committed suicide in his cell - and the shocking police photograph of his hanged body was staged to make it look like this was the case. With the collapse of the military dictatorship in 1985, Herzog’s family and supporters, opponents of the military and the new democratic regime called for truth processes to be established, such as the Commission of Deceased and Missing Political People (1995), the Amnesty Commission (2002) and the ‘Centro

“ *Powerful presentations focused on the role of archives in the creation of Truth and Evidence Commissions* ”



Congress 2016, Seoul, Korea. ©ICA

de Memorias Reveladas' (2009), culminating in 2011 with the National Truth Commission (2011), which had as its objective the investigating and clarifying of serious human rights violations' between 1946-1985, in order to "implement the right to memory and right to historical truth, and to promote national reconciliation". All documents and audio-visual material were transferred to the Brazilian National Archives, including thousands of research documents, over 1,000 testimonies of victims and family members, statements from army officers, forensic reports, videos of over 200 public audiences and testimonies, and 47,000 photographs. Out of the countless historical truths to emerge from this archive, sufficient evidence was available to take Herzog's case to the Inter-American Court of Human Rights in 2009, which determined that Herzog was detained, tortured and killed by state agents while he was in custody in an Army facility.

The South African Truth and Reconciliation Commission (SATRC) discussed by Mpho Ngoepe, University of South Africa, had similar aspirations when it was established between 1995-1998 with Archbishop Desmond Tutu as its head. The Commission was integral to the nation's negotiated settlement and transformation from authoritarianism and racism to a constitutional



Congress 2016, Seoul, Korea. ©ICA

democracy. As Verne Harris (Director of Research and Archive at the Nelson Mandela Foundation) reflected: "If any archive in South Africa should be open, and widely used for and by the public, it is the SATRC". All of the commission's records were transferred to the National Archives - files relating to human rights' violations; amnesty applications; reparation, rehabilitation and witness protection records; thousands of transcripts of evidence and hearings, together with tens of thousands of photographs. The archives played a vital role in the redress, transformation and reconciliation processes in South Africa, aided by new Freedom of Information legislation in 2000 and the National Archives and Records Service of South Africa Act, 1996, both of which sought to promote access to information. From these records came opportunities for hope and new beginnings.

In the third presentation, John Hocking, United Nations for International Criminal Tribunals, powerfully argued that from the ashes of violence and destruction archivists and archives can have a key role in processes that set out to forge a voice for hope, reconciliation and the future for war-torn societies. His discussion covered the extensive archive services created by the International Criminal Tribunals that were established by the United Nations courts to document and investigate the international



Congress 2016, Seoul, Korea. © Ian Wakeling



Congress 2016, Seoul, Korea. © ICA

“Archivists and archives can have a key role in processes that set out to forge a voice for hope and reconciliation”

crimes that afflicted the former Yugoslavia in the early 1990s and which killed nearly one million people in 100 days in Rwanda - archives that were “like a mosaic of horrors and devastation. But amidst the clothes exhumed from mass graves in Rwanda, and the remains of a mortar from the shelling of Sarajevo, the Tribunals’ archives also offer beacons for a brighter future. The archives can show us a path towards personal and collective reconciliation”.

While each of these archives has created digital access and preservation projects, the data explosion of the twenty-first century also raises critical questions about the ability of archivists to manage, understand and preserve society-changing and life-changing developments in digital formats. Several presentations in Seoul opened this particular window to survey the scene and ask some major questions. The ‘Digital Economy’ is the fourth industrial revolution. Ethically, will societies have to question the extent of data exploitation and how this affects personal privacy? How will governments respond and regulate this new economy where data and technology can be used to counter and monitor opposition - for example, through government and regime sponsored hacking, or surveillance? Where do individuals stand as data is

analysed to look at the services people use, algorithms analyse behaviours and needs, and where services are ever-more personalised? Where does the archivist stand in this world - a world where 4.7bn individuals own a mobile phone and over 3.2bn use the mobile internet? Will the archivist ‘in the age of FANG (Facebook, Amazon/Apple, Netflix, Google)’ still be someone who can help a person and a society retrieve what is most precious to them - their identity - and, in doing so, help an entire society right its wrongs and move from a divisive past into an inclusive future? Might there be a place for the development of digital ‘safekeeping’ places and records services for underrepresented, threatened and migrant communities around the world? Finally, will the work of archives and archivists still be able to embody the spirit of the Universal Declaration on Archives “to promote responsible citizenship”? The Seoul ICA Congress 2016 raised the question - it is now the responsibility of archivists to answer this global dilemma.

Ian Wakeling

The Children’s Society

Welcome to the Records Management issue

As Chair of the Section for Records Management and Information Governance (RMIG), I would like to welcome you to our Records Management Special Edition.

I would also like to take this opportunity to thank all those members who have submitted articles. We certainly have a wide range, from Rod Stone's update on the revised ISO 15489 to Sunny Seregen's insights into practical implementation of electronic records management. This just shows the number of challenges we face and how important our role is in maintaining 'the corporate memory' for our different organisations.

I am always astounded by how little companies seem to value the importance of good record keeping until things go wrong or they need something urgently. That is why it is so important, especially in this rapidly changing technological world, for us to show what value we can bring to the table in providing efficient records management support. This will be even more crucial next year when the new General Data Protection Regulation comes into force, whereby the right to be forgotten, amongst other challenges, will no doubt see our workload increase.

Therefore it is vital that we stick together as a profession and share our knowledge and experience. This is something that the RMIG Executive Committee is passionate about but we still need your help. So if you want to help support your colleagues, please get in contact with one of us (our details are on the RMIG pages of the ARA website).

Finally, I would like to thank Natalya Kusel on our Committee who has worked hard to coordinate this special edition. I hope you find the articles an interesting read.

Jason King

Chair of the Records Management and Information Governance Group

20 Years in 60 Minutes - taking a byte of learning

Amy Greir, Kevin Mulley and Carol Welch discuss the development of a successful e-Learning tool.

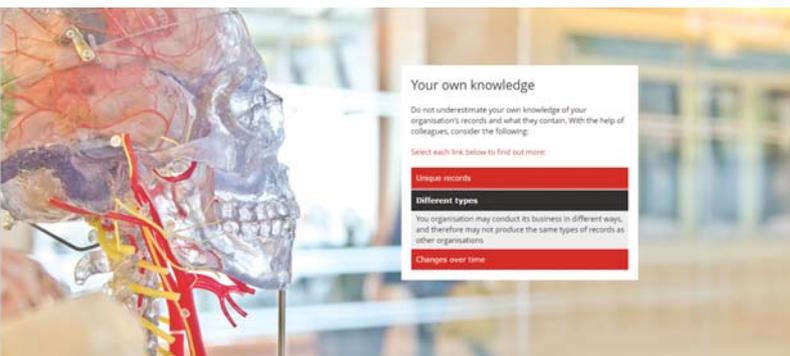
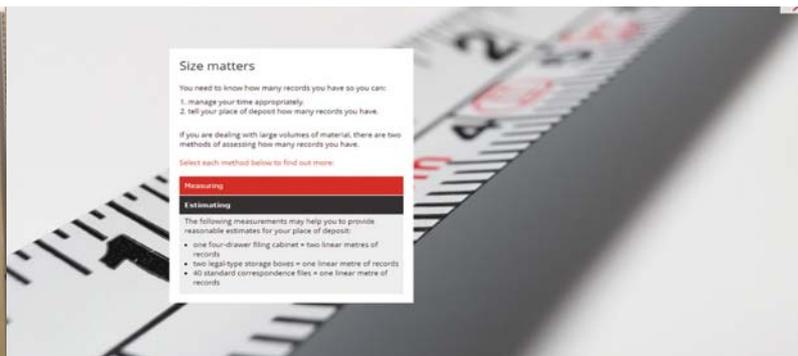
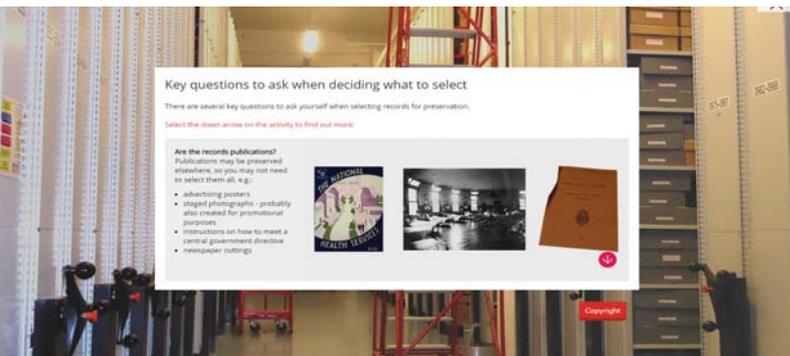
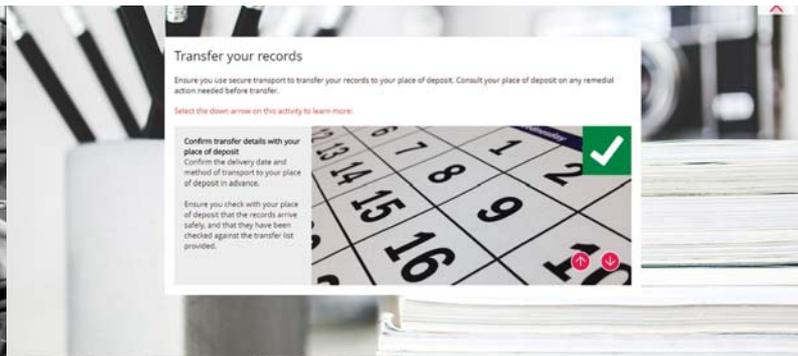
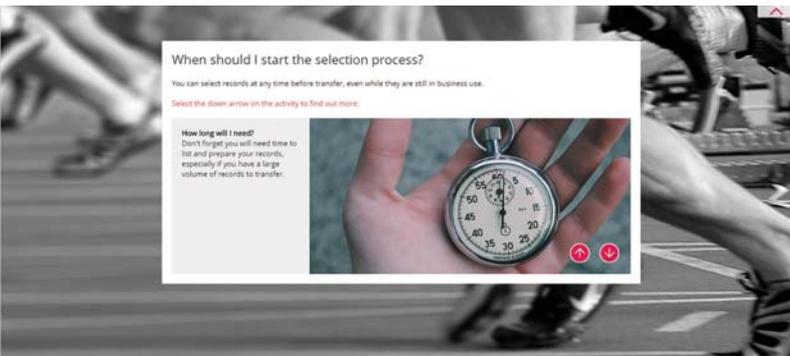
In 2015 the Public Records Act was amended to reduce the period for transferring public records to local archive services (appointed as 'places of deposit') from 30 to 20 years.

During a ten-year transition period, over 1,400 public sector organisations (including NHS hospitals, prisons, coroners and courts) will be required to transfer their records at an increased rate to more than 100 places of deposit around the country.

The National Archives' review in advance of this change found local transfers were often sporadic, and driven by organisational change and building closure.

Approaching this challenge, in two years we have:

- engaged with Whitehall departments and local organisations to update central guidance, such as the NHS Records Management Code;
- surveyed more than 250 organisations to establish current record holdings and transfer backlogs;
- introduced new processes to monitor +3,000m of public records transferred to places of deposit during the last two years, issuing support and guidance;



Images showing screen shots of the e-learning module courtesy of The National Archives

- produced a directory to help local organisations get in touch with their place of deposit;
- annually distributed central government funding totalling £660,000 to help local authority places of deposit deal with the increased transfers during transition;
- delivered in-person training on public record transfer to more than 350 organisations.

The training prompted more organisations to engage with their local place of deposit, but with high staff turnover in local organisations, and frequent organisational restructures, we knew this would be unsustainable long term.

Going digital

The solution involved our Project Manager working with our e-Learning Manager to produce a simple hour-long e-learning package, designed to replicate the in-person training.

The online training package is designed for organisations that are required to transfer public records. It is aimed at staff newly in post or those unfamiliar with the processes or legislation, so that they can quickly pick up key concepts and requirements to be compliant with the Public Records Act.

Producing an e-learning module means that this course is available to all staff as and when they need it, rather than a few staff when an in-person course is scheduled. We hope that this approach will encourage staff to complete the course, and use it as a refresher. The modern look has been exploited with the incorporation of relevant or thought provoking images to support the information.

Designing the course

The six modules are short and to the point, targeting the key information staff need to know about records management and transfer. Created using Gomo software, each module can be completed individually in between

five and 20 minutes, with modules on record selection designed for specific sectors, ensuring content is directly relevant.

- ✓ Introduction
- ✓ Public Records Act
- ✓ Places of deposit
- ✓ Locating your records
- ✓ Selecting your records
- ✓ Transfer
- ✓ Access to transferred records

The e-learning course is comprised of short modules

Each module ends with a short test to ensure trainees understand key messages. Several former onsite trainees from each sector and colleagues from places of deposit provided feedback as each module was created.

Archive tours were a key part of onsite training, helping staff to understand what archive services do, what records are, and what happens to them after transfer. To reproduce this, we worked with Sally Bevan and David Luck at London Metropolitan Archives (LMA) to create a short video, showing how LMA works with its numerous public records depositors.

Our feedback has shown that our messages concerning compliant transfer are getting across:

“Visually very striking, information accessible and easy to use”

“It reduces a subject which seems subjective and complex to some reasonably easy-to-follow rules”

“The information is given in a clear and uncomplicated way”

Our course went live in July 2017, and we will be working with central government and archive sector colleagues to ensure registration and usage is high. We hope that places of deposit will also find individual modules useful for helping depositors not covered by the Act with the general transfer process.

You can find out more about the 20-year rule programme for local transfers online: <http://www.nationalarchives.gov.uk/archives-sector/our-archives-sector-role/legislation/20-year-rule-and-records-of-local-interest/>

You can contact us online at:
asd@nationalarchives.gsi.gov.uk

Amy Greir, Kevin Mulley and Carol Welch

The National Archives (UK)

Introducing the information management self-assessment tool

Jo Moorshead highlights a new tool to assess the effectiveness of records management within an organisation.

In April 2017 The National Archives launched its new information management self-assessment tool. It is the culmination of two years' work and was developed as part of The National Archives' Information Management Assessment (IMA) programme to help government organisations assess the effectiveness of their approach to information and records management.

The IMA programme was established in 2008 and we currently target around 30 government departments (largely departments of state) for assessment and reassessment every 3-5 years. The self-assessment tool will complement this programme and enable us to extend the benefits of assessment to a wider government and public sector audience. It is not intended to replace the formal IMA process.

Self-assessing information and records management is not a new concept. Some of you may remember the spreadsheet-based tools that we published in the past, including the IMA self-assessment questionnaire and a s46 assessment tool. We wanted to take the best bits from these, update the content and create an online tool that was easy to use and offered greater functionality than a spreadsheet. Our new tool is based on Moodle, a platform we also use for our e-learning packages.



It's simple to do the self-assessment online; photo by Jesus Kiteque on Unsplash



Use the tool to assess your organisation's approach; photo by Jennifer Burk on Unsplash

The self-assessment tool is divided into five modules:

- **Valuing your information** - including senior engagement with, and strategies for, information management, and information and records management culture;
- **Managing digital information throughout its lifecycle** - including systems to manage digital information and records, and planning to ensure the digital continuity of that information;
- **Managing information risk and information assurance** - including recognising and mitigating information and records management risks, information asset management, roles and responsibilities;
- **Governing information and records management** - including ensuring the right governance structures and staff are in place, providing policy, guidance and training, and measuring the impact of this;
- **Reviewing and transferring records** - including fulfilling statutory responsibilities under the Public Records Act, processes for appraisal and selection, sensitivity review and disposal, and transfer planning.

“There is the flexibility to target the assessment in the areas where you need it most”

You can attempt some or all of these modules, as required, and will receive results for each module you complete - this will give you the flexibility to target the assessment in the areas where you need it most. Questions are in a simple multiple-choice format and results include an overall Red, Amber, Green (RAG) rating for each area, alongside feedback and links to relevant guidance published by The National Archives.

There is also an end user questionnaire which will be sent to a representative selection of staff across your organisation. This will enable you to build a picture of how information and records are being managed out in the business.

Feedback is designed to help you improve your organisation's approach to information and records management. Ideally these points should be used to create an action plan, which also documents appropriate owners for each activity and timescales for completion. For maximum impact, action plans should be signed off at a senior level and progress should be reported to an appropriately senior governance board. We recommend Public Records Bodies should discuss their results, action plan and progress with The National Archives.

The self-assessment tool can be found on The National Archives' website: <http://www.nationalarchives.gov.uk/information-management/manage-information/ima/information-management-self-assessment-tool/>

There has been a huge amount of interest in this so far with lots of people from the public sector signing up, as well as interest from the private sector in the UK and other parts of the world.

We hope you find the tool useful and are keen to hear your feedback:
information.management@nationalarchives.gsi.gov.uk

Jo Moorshead

The National Archives (UK)

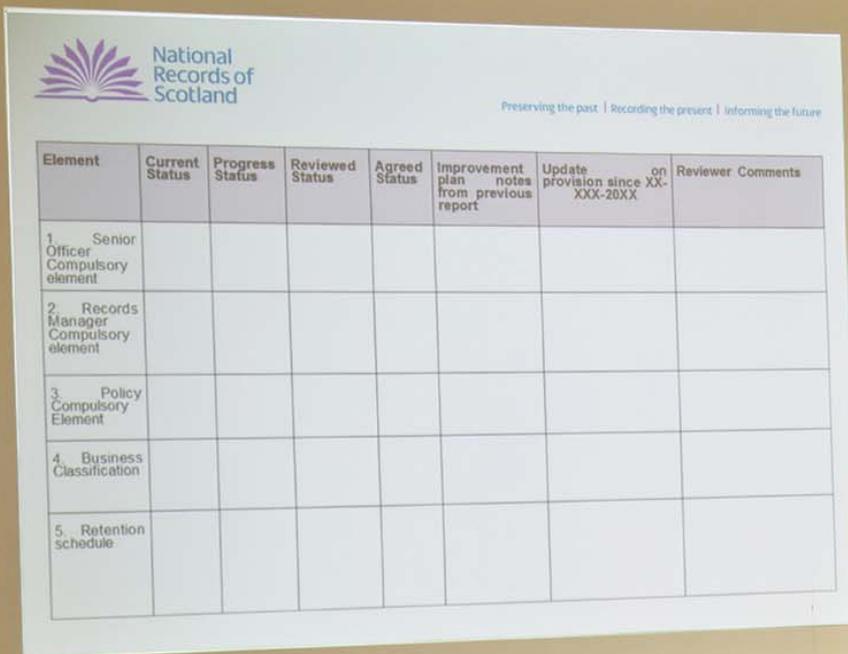
Supporting continuous improvement: the Progress Update Review (PUR) mechanism

Neil Adams introduces a new initiative developed by the National Records of Scotland.

In April 2017 Scottish public authorities named under the Public Records (Scotland) Act 2011 (the Act) began receiving invitations to participate in the newly established Progress Update Review (PUR) process. Designed through consultation with stakeholders, the National Records of Scotland (NRS) introduced the PUR mechanism to support and enable authorities to voluntarily self-assess and receive comment on the progress they are achieving under their agreed Record Management Plans (RMPs).

Following the Act's introduction in 2013 stakeholders expressed the hope that regular communication with the NRS, through the receipt of feedback on new policies and on-going developments, would ensure the continued enrichment of records management provision within their authorities. Welcoming these comments, and keen to maintain the enthusiasm and good work inspired by the Act, the NRS in 2015 began work on developing a structure to enable authorities to share updates on specific changes to their RMPs and on the general progress in recordkeeping they were effecting.

The challenge was to establish a process which balanced the obligation on authorities under the Act to keep their RMPs under review with the need to avoid creating an overly burdensome, resource-intensive process. Conscious that the new mechanism's utility and uptake relied on stakeholder support, the development of the



Element	Current Status	Progress Status	Reviewed Status	Agreed Status	Improvement notes plan from previous report	Update provision since XX-XXX-20XX	Reviewer Comments
1. Senior Officer Compulsory element							
2. Records Manager Compulsory element							
3. Policy Compulsory Element							
4. Business Classification							
5. Retention schedule							

Discussing the PUR process at a Stakeholder Forum event at the NRS, Edinburgh; Crown Copyright

PUR mechanism therefore reflected a collaborative enterprise in which the views of record managers from across a diverse range of public authorities were actively sought and acted upon.

First announced in the 2016 Annual Report issued by the Keeper of the Records of Scotland and piloted later that year by East Lothian Council, the PUR mechanism seeks to be both user-friendly and practical. A standardised template, which replicates the look and feel of the original Keeper’s Assessment Report on an authority’s agreed RMP, is issued to record managers. This template can be populated with updates on the authority’s implementation of new initiatives and the continuing improvements in recordkeeping being achieved.

To avoid adding to the workload pressures on already over-burdened authorities, extensive documentary evidence does not need to be provided in support of these general progress update statements. Only where elements

“ *The NRS will gain a valuable insight into the quality of recordkeeping across Scottish public authorities* ”

were agreed by the Keeper on an “improvement model” basis will a formal submission of evidence be required.

Authorities engaging in this process will receive feedback from the Assessment Team and, where supporting evidence has been enclosed, awarded a new assessment status for each of the 14 elements. These will reflect the likely status allocations an authority might receive in the event of a future, formal assessment of their RMP by the Keeper.

It is our hope that record managers will be equipped through participating in the PUR process to demonstrate

“ *The ethos motivating the PUR scheme is one of bringing about a cultural change in recordkeeping* ”

both to senior management and the wider public their endeavours and successes in improving records management arrangements within their authorities. Meanwhile the NRS will gain a valuable insight into the quality of recordkeeping across Scottish public authorities.

The team intends to invite all those authorities with agreed RMPs to submit a progress update assessment within the coming year and to send annual invitations thereafter. This may seem a somewhat optimistic hope perhaps for our reasonably small team. However, we do not expect each authority to voluntarily submit progress updates every year (although they are more than welcome to do so!), and the team will be able to focus its efforts on the PUR mechanism following successful completion of the scheduled invitation of RMP submissions by the end of 2017.

The ethos motivating the PUR scheme is one of bringing about a cultural change in recordkeeping not through mandatory directives imposed from above but rather through a collaborative effort between stakeholders and the Assessment Team. The PUR mechanism hopefully provides a structured process which will facilitate on-going fruitful dialogue, lead to regular updates on policy implementation and success stories, and encourage the continuous improvement of records management provision across Scotland. The next few years will show how far these ambitious aims are being realised.

Neil Adams

National Records of Scotland

Ten top tips for surviving the records management jungle

Jason King has some advice for anyone navigating dangerous terrain!

According to one of those ‘which animal are you?’ websites, I’m a crocodile. Apparently I am one of those “lean, leathery individuals with an air of wariness that comes from living on the edge ... doing jobs that others find too unpleasant ... using their ability to mask their true colours, allowing them to befriend unsuspecting victims, usurp their resources and then disappear”.

I will leave it to those who know me to comment about whether that description is accurate, but I would agree that I live in a jungle. The problem is that mine happens to be a Records Management (RM) jungle.

So how do I survive? Here are my top ten tips in case you find yourself in the same situation:

1. Be confident and decisive

This is all about knowing your stuff and making decisions based on knowledge, experience and cunning. Part of that is about reading as much relevant material as you can get your hands on.

You may also consider getting an RM qualification. This can mean a hard slog depending on what route you take, but it is well worth the effort in terms of becoming a recognised expert.

It is also about taking risks. Obviously some risks should be avoided but others are worth taking as long as you know and accept the consequences. We manage records, not perform open-heart surgery. If things go wrong,



Crocodile in the Records Management jungle; photo by Kyaw Tun on Unsplash

just fix them, chalk up your mistake to experience, eat chocolate, drink tea and move on.

2. Make sure you have a retention schedule

Having a retention schedule is obviously crucial to managing records. The hard part is creating one from scratch. A good source of advice is The National Archives (UK) website¹ which has a lot of information on suggested retention periods. Obviously each organisation is different and therefore has different sets of records, but often there is a core set common to everyone (Personnel, Finance, Contractual etc.) so seeing what other organisations have used is a good place to start.

Also, speak to teams about the records they have and agree a retention period with them. Once you have got past the 'No, we cannot keep your records forever' conversation, you can start agreeing timeframes based on business - and sensible - need with sound, justifiable reasons. Remember, you are the expert so have confidence in the retention periods you suggest. If in doubt, suggest eight years (which at least takes care of financial records with a bit of extra time for good measure) and then review after that.

3. Have Record and Information Management (RIM) policies to refer staff to

Having an RM policy in place makes life a lot easier. Once you have a policy, even a skeleton one, regularly review and update it as the problems arise and as you solve them. Better to have a policy and keep developing it than not have one at all!

If you really want to give your policy the seal of approval, try to get your Management Board to approve it. It might involve a bit of a slog to get it on to their agenda but once you have made the benefits of good RM clear and they approve your policy, you can use this in any tricky compliance discussions with staff.

4. Get to know the IT team

The IT team influence the future and, with technology changing so rapidly, keeping them on your side will help with the electronic RM of your organisation.

The IT team might be more focused on making sure that the network does not keel over or grind to a halt, but this means they will gladly work with you in reducing the amount of electronic records that staff hold.



Top tips to navigate the Records Management jungle; photo by Syrok (Creative Commons BY 2.0)

5. Work with users, not against them

This is probably my most important tip. Let's be honest, unless paper records are falling out of cupboards and there is no space to put away the office Christmas decorations, staff don't care tuppence about records until they really need something, so there is no point in trying to convert them to be outstanding record keepers. Instead, show them the benefits of good RM. You can tell them that it will save the organisation money. However, explaining that they will work more efficiently might be a better approach.

Going back to the overflowing cupboards full of records: it's amazing how by simply saying 'I'll help you archive them', you'll gain friends and a reputation as a problem-solver. Yes it will mean more work for you but the reward, in terms of a 'returned favour' to be used sometime in the future, will be worth it.

6. Get out more and network like crazy

You will find that most organisations have someone who deals with their records. Once you get out there and meet them, you'll discover you are not alone and that your problems are the same as theirs.

Also, it's a great opportunity to benchmark and discover how others have solved similar problems to yours. Why keep reinventing the wheel? So join RM organisations and go to meetings away from your office with like-minded experts discussing topics relevant to you for once. It counts towards your Continued Professional Development and is a good reason to get out of the basement.

7. Embrace both paper and electronic records

We all know that the volume of electronic information processed each day is rapidly increasing. However, don't forget your organisation's paper records just sitting there building up monthly storage costs. It's surprising how quickly you find out that "we only have a few boxes of records and they are all correctly labelled" turns out to be a total fib.

We may find them harder to deal with, but paper records will still be around for a while yet. Appreciate the value of putting time and effort in getting them correctly catalogued and managing their lifecycle.

8. Be organised

How can you manage your organisation's records if you cannot organise yourself? Make sure you know what you have got both in terms of paper and electronic records, where it all is and how long it should be kept for.

9. Ride the change wave

Change is everywhere, no more so than in RM. Those IT systems we thought would revolutionise the way we dealt with electronic records are now obsolete. The way we catalogued our paper files is now no longer the most efficient way. The storage area we have just moved our boxes of files to is no longer available for us to use. And of course, we have Cloud storage plus the new General Data Protection Regulation to get our heads around.

So my advice is just to smile, take a deep breath and chant the words 'Okay', 'No problem', 'I can do this'. Remember, you are the expert.

10. Don't panic

My final tip. Douglas Adam was correct when he put "Don't Panic" on the front cover of the *Hitchhiker's Guide to the Galaxy*. Always remember that they are only records and you can only do your best. All things in perspective.

Jason King

Department for Communities and Local Government

¹ <http://www.nationalarchives.gov.uk/information-management/browse-guidance-standards/?letter=r>

Don't Risk It! - phase two - focusing on risk

Jon Elliott discusses building your organisation's 'Risk Register' around Records Management

Advocacy has been a consistent theme since ARA's *Don't Risk It! Know Your Records* campaign started in 2014. The battle to get senior managers to see records management as more than 'just filing' or a subset of the organisation's IT function has been a long one. So we know that we have our work cut out.

Culture and Leadership

We all know examples of organisations that do take records seriously, who understand that good records practice improves efficiency and the quality of decision-making, information access and availability and saves money (among other things) on storage costs. But we all know examples of senior managers with a seemingly extra-ordinary appetite for risk when it comes to records, knowledge and information management.

Personally, I put this down to ignorance: if you don't know much about records management, it's easy to dismiss it as a 'cost centre' that can be whittled away or merged with other 'technology sounding' departments. Except when a senior manager can't find the document or record that they want.

The Risk Register

But the 'risk' area is one that organisations are now beginning to take more seriously. At the very least, there should be a Board member or Trustee responsible for maintaining the *Risk Register*. If you belong to a private sector organisation, this document may not be displayed publicly, but it should be accessible by departmental managers.

Your organisation's *Register* should 'score' those things that pose the biggest threats to its ability to continue as a going concern. Areas of focus could include:

- Compliance: health and safety, data protection, audit, and so on;
- Reputation: cyber-security, customer service, poor service/goods, etc.;
- Business continuity: fire, flood, information systems break-down and back-up, etc.;
- Political: change in government policy, change of government, and so on.

These things matter to Boards and senior managers, of course, because they could result in arrests, fines, loss of business or loss of employment. Since records

are the life-blood of most (if not all) organisations, it is our view that Risk Registers should address and consider the consequences if records of all kinds (internal, customer, supplier, tax, and so on) were to be lost, hacked, held ransom or misplaced.

Phase Two Don't Risk It! Campaign Training

So, following a consultation with the Section for Records Management and Information Governance, we held the first training session for records managers on risk registers at the section's AGM on 24 July in London. Depending on feedback from this session, we will then aim to roll it out across the UK and Ireland.

The critical element to the training design is interaction on real-life practical issues: if you want to take part, you will need to bring a copy of your organisation's risk register or (if you are not allowed access) a list of the records issues that you believe pose a risk to the organisation. We will refer frequently to the ARA's own risk register during future training. And we will focus on each person's own situation, under the Chatham House rule: i.e., anything that gets discussed will have to stay (strictly) in the room.

Case Studies

The ARA Board agreed in 2016 to fund some research into case studies that ARA records managers could use if starting on risk assessment from a blank sheet of paper or those looking for examples of fines or sanctions in particular risk areas.

The resulting 'library' of case studies will be available to members from the first session in July, and put on the *Don't Risk It!* pages of the ARA website. In consultation, a number of members have pointed out additional information that they would ultimately like to see added to the 'library', and we will look at a follow-up research exercise to bolster the resource.

The Goal?

The overall aim of Phase Two of the campaign is to equip records managers with tools to enhance their visibility internally within your organisations. We'll of course welcome members in archival and conservator roles who want to join in, especially where they see parallels with their own workplace situations.

Sincere thanks to those members that attended on 24 July, and I hope to see as many of you as possible at future sessions.

Jon Elliott

Archives and Records Association



The Risk Register: Getting Started

All Organisations should have. ARA's is in your pack. Use it for reference.

ARA Risk Register

3. The main risks facing the Archives and Records Association in 2016-21017 have been identified as follows.

NB they are not in a priority order and the principal risk categories are noted:

1. Risk of failure to deliver the Association's charitable aims and its strategic arms/business plan (A,C,D,E,G)
2. Risk of failure to maintain/increase membership due to external factors (A,C,D,G)
3. Risk of failure to manage the Association effectively, particularly in dealing with external threats to business continuity (A,C,D,G)
4. Risk of the Board being indadequate to deliver appropriate governance for the Association,particularly in not having the appropriate skills and experience (A,D,G)
5. Risk of financial or other mismanagement by staff/Board members or other ARA officers (A,C,D,G)
6. Risk of failure to maintain human and financial resources for the Association particularly through lack of member volunteers and income (A,C,D,G)

4. They have been assessed for likelihood and impact:

IMPACT	CATASTROPHIC	5				
	MAJOR	1				
	MODERATE	2	3	4,6		
	MINOR					
	INSIGNIFICANT					
			RARE	UNLIKELY	POSSIBLE	LIKELY
LIKELIHOOD						



Doing the analysis: Don't Risk It! Case Studies Library

Purpose: to get you started.

- A live reference: needs to be developed/ expanded by members and ARA.
- A second phase is

[ARA Don't Risk It](#)

Case highlighting Breaches of Law

Case Code	Organisation Name	Sector	Activity	Time of breach
F1	Prodiat	Private	Call	March 2016

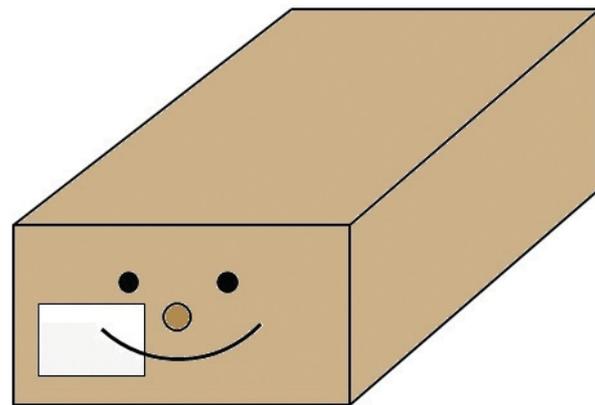
Neither carrot nor stick, but Harry!

Michelle Conway and Imogen Watts introduce Gloucestershire's records management hero.

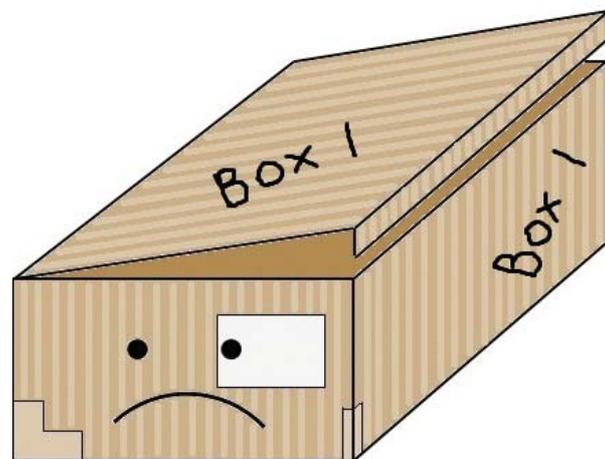
The Information Management Service at Gloucestershire County Council provides records management guidance and support for the organisation, as well as storing the Council's semi-current records in its Records Centre. In 2015 we launched a Records Centre Transformation Project, which aimed to streamline procedures for depositing and disposing of files in the Records Centre, as well as raise awareness of the Records Centre. The project was successful and many teams engaged with the work, enabling us to raise the profile of records management across the Council. As we settled back into business as usual, we wanted to harness the level of engagement that we had developed and sustain the interest of our internal customers.

The idea for a team mascot came when exasperation with the number of incorrectly packed boxes being deposited in the Records Centre inspired the Information and Records Manager to draw an 'ideal box' on the team whiteboard. This box, labelled with the requirements of how boxes should be filled when they are deposited, came complete with a smiley face. Another member of the team jokingly named the drawing, and so Harry the Happy Box was born.

Not all heroes wear capes, and in this case, our hero Harry sports a Records Centre label and a friendly smile. But, as any comic book fan will know, all heroes need an anti-hero (or anti-heroine), and Myrtle the Miserable Box is ours - or rather Harry's. Myrtle is a forlorn-looking patchwork of all of the ways in which various customers



Harry the Happy Box; courtesy of Gloucestershire County Council



Myrtle the Miserable Box; courtesy of Gloucestershire County Council

Harry the Happy Box cuddly toy with an ideal box!
Courtesy of Gloucestershire County Council



have managed to veer away from the guidelines for depositing boxes, with distinguishing features including being put together inside-out and held together with sticky tape (and a suitably unhappy face).

Harry and Myrtle made their first public appearance in one of the monthly newsletters that we send out to the users of our Records Centre database. The reaction was immediate and unanimously enthusiastic. We received many emails from people saying how fun the characters are and how they'd made them laugh. Moreover, we also had several people contact us to say they were sorry that they'd been sending us 'Myrtles' and promising to send 'Harrys' from now on! The archives service also asked if they could adopt Harry and Myrtle to include in their new guidance for volunteers.

Since then, we've used the Harry and Myrtle characters in a range of communications (they're a regular feature in our newsletter), directing people towards good records management and indexing practices, and making people aware of the mistakes they've made in an accessible and memorable manner. It has also made us, as a team, seem more approachable, especially as many of our customers only receive contact by email and don't get to put a face to the Records Centre team.

Our plans for Harry are still in progress, ranging from the weird and wonderful to the (relatively) serious and sensible, depending on how close to Friday afternoon we are! We even have a cuddly toy Harry (made by the Records Manager) that we can take with us to records management roadshows, advice clinics and awareness events - think University Challenge mascots! Who wouldn't want the chance to cuddle a Harry?

I suspect many of you are currently thinking this sounds like great fun, and you'd love to do something similar in your workplaces. Here's the secret: this cost us no more than a few hours of staff time. We initially created very basic line drawings of the pair in Microsoft Word, which we later honed and coloured in using MS Paint - common programmes on many a desktop. It's surprising how far a little creativity (and a dash of perseverance) can take you with minimal resources!

One of the biggest misconceptions about our sector is that records management is dull and boring. Harry and Myrtle provide a light-hearted means of engaging people with records management services and principles, and a soft approach to enforcing good practice. They are proof that people are very willing to engage with things which brighten up the working day, and that records management can be fun!

Michelle Conway and Imogen Watts

Gloucestershire County Council

GDPR: data protection for the digital age

Natalya Kusel considers the forthcoming General Data Protection Regulation.

The EU General Data Protection Regulation (GDPR) will come into effect on 25 May 2018, replacing the Data Protection Act 1998 (DPA). The Queen's speech on 21 June removed any lingering doubts about the government's commitment to retain the GDPR after Brexit, promising to introduce a new Data Protection Bill that will implement the GDPR and the new Directive which applies to law enforcement data processing.

The bulk of the data protection regime will remain broadly the same, but the GDPR will bring about some major changes for practitioners to sink their teeth into, including extending the definition of 'personal data'; strengthening the rights of data subjects; and, perhaps the most eye-catching, substantially increasing fines for non-compliance.

Digital information was in its infancy when the DPA came into force, and in the intervening 19 years the collection and use of personal data has been transformed. The new regime has been updated to reflect this.

Records professionals wear many hats, and one thing many will be doing is contributing to or

The EU's data protection regime has been updated for the digital age; public domain (CCo 1.0)



leading on their organisation's preparations for the GDPR. To help with that preparation, here are six key changes to the data protection regime that the regulation will usher in. Check the ICO website for detailed guidance on the GDPR tenets and how to prepare for it coming into force.

Controllers and processors

Under the DPA, data 'controllers' and 'processors' had different legal duties, but the GDPR will place a greater burden on processors than its predecessor law. For example, processors will be required to maintain records of personal data processing activities, and will have significantly more legal liability if they are responsible for a breach.

However, controllers are not relieved of their obligations where a processor is involved - both parties will need to work closely together to ensure that their contracts address GDPR requirements.

Personal data and sensitive personal data

Those with data protection responsibilities will be well familiar with the DPA terms 'personal data' and 'sensitive personal data'. The name of the former remains unchanged under the GDPR, but the latter has been renamed 'special categories of personal data'.

The GDPR's definition of personal data is similar to the DPA, but it is more precise, reflecting changes in technology and the way that organisations collect information; for instance, it specifically says that location data and other online identifiers, such as an IP address, can be personal data.

'Special categories of personal data', meanwhile, can now also include genetic and biometric data, along with categories familiar from the DPA such as political beliefs and sexual orientation.

Accountability

The DPA is based around eight principles that set out expectations about how personal data is managed. The GDPR streamlines these to six principles but the expectations are broadly the same. However, there is a greater emphasis on 'accountability', which requires organisations to ensure and demonstrate that they comply with the principles and put in place "comprehensive but proportionate governance measures" in the words of the ICO.

These include technical and organisational measures, such as data protection policies, procedures, training and internal audits; maintaining documentation on processing activities; implementing measures that meet the principles of 'data protection by design and by default', such as data minimisation or pseudonymisation; and carrying out data protection impact assessments in some circumstances, such as when planning processing activities involving new technologies, or extensive processing of personal data, particularly special categories of data or personal data in relation to criminal convictions or offences.

Organisations will be required to appoint a data protection officer (DPO) if it is a public authority; if it carries out large scale systematic monitoring of individuals (the example given by the ICO is online behaviour tracking); or if it carries out large scale processing of special categories of data. This DPO can either be a member of staff or an external contractor, but they must report to the board.

Legal basis for processing

In a change from the DPA, practitioners will now be required to identify and document all data processing activities carried out by their organisation. It will be critical to specify the legal basis for which that processing is permitted. This will need to be expressed in your privacy notice.

Where the lawful basis for processing is consent, organisations must be aware that under GDPR this will require some sort of affirmative action, so silence, pre-ticked boxes or inactivity are off the cards. Consent must also be verifiable; an audit trail will need to be kept of how and when consent was given.

One of the GDPR principles is 'lawfulness, fairness and transparency'. On the final point in that list, the GDPR states that "any information and communication relating to the processing of ... personal data be easily accessible and easy to understand, and that clear and plain language be used".

This is particularly pertinent when considering services offered to children, and the ICO says that in such circumstances you must ensure that your privacy notice is written in a clear, plain way that a child will understand.



The commencement of GDPR is approaching; photo by Lukas Blazek on Unsplash

The ICO has recently updated its privacy notice guidelines to take account of GDPR, and these are worth consulting.

Individual rights

The DPA gives rights to individuals regarding personal data that organisations hold about them. The GDPR is no different, but the rights have been updated for our new information age, with existing rights clarified and extended, and new rights introduced.

These include the ‘right to erasure’ (also known under the controversial term ‘right to be forgotten’, and only applies if certain conditions are met); the ‘right to restriction of processing’ (such as when data accuracy or lawfulness is contested); and the ‘right to data portability’ (which allows individuals to obtain and reuse structured and machine readable personal data for their own purposes across different services).

Regulatory oversight

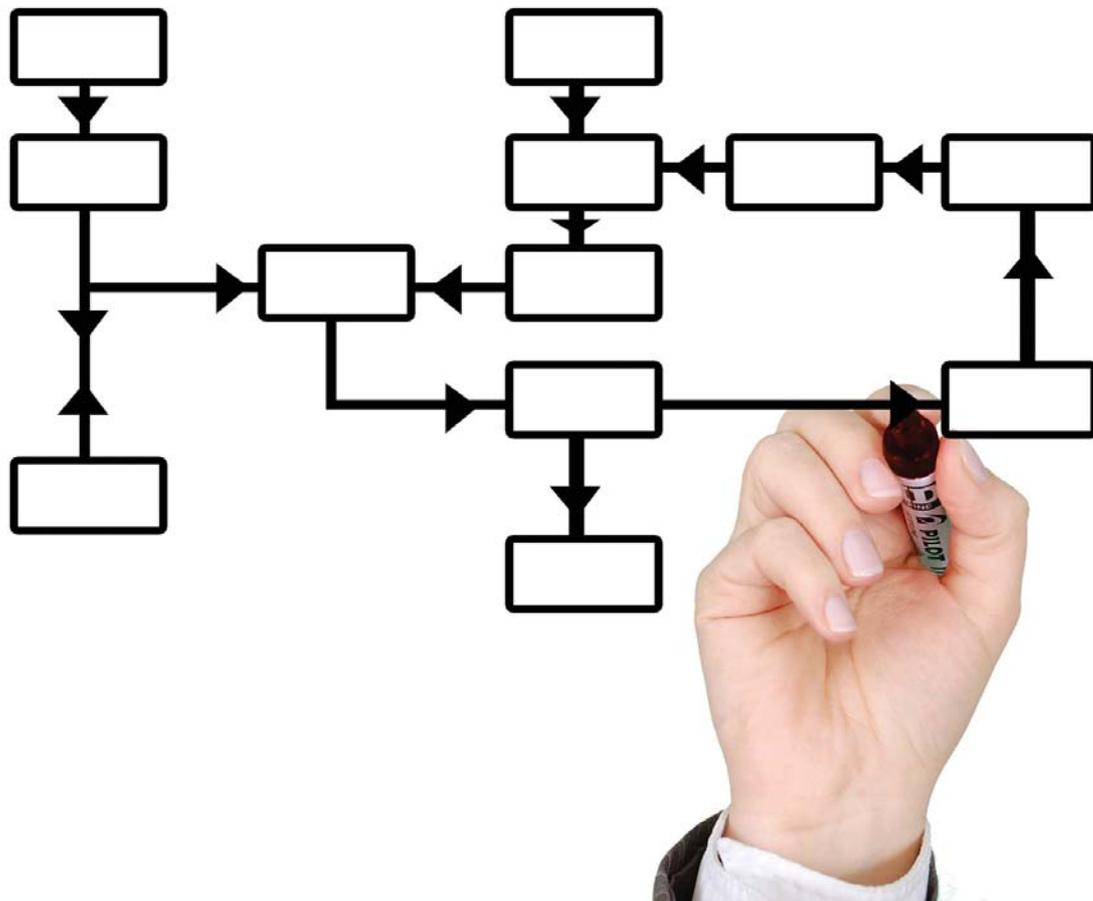
Under the DPA, there is no legal obligation to report to the ICO any breaches of security which result in loss, release or corruption of personal data, despite the regulator encouraging data controllers to report ‘serious breaches’.

However, the GDPR will introduce a duty on all organisations to report data breaches that are likely to result in a risk to the rights and freedoms of individuals to the relevant supervisory authority within 72 hours of the organisation becoming aware of it. Where a breach is likely to result in a high risk to the rights and freedoms of individuals, those individuals must also be notified directly.

The eye-watering fines that can be levied for breaching the GDPR have garnered the most attention in the press. Currently, the maximum fine for the most serious breaches of the DPA is £500,000. However, under the GDPR, a two-tier system of penalties will apply, with the most serious breaches - including for infringement of consent requirements and data subjects’ rights - attracting fines of up to 4% of global turnover or €20m, whichever is higher.

Natalya Kusel

Section for Records Management and Information Governance



Functional activity model: lessons learnt

Sunny Seregen reflects on the first six months of working in a new organisation.

The functional activity model is, arguably, the ultimate electronic filing system for many organisations. It is easy to collaborate between departments, fosters a culture of accountability, strengthens business continuity provisions, and easily works alongside granular access controls.

Information is a valuable asset and one that should be kept track of and looked after. In some cases, not having a functional activity model could be compared to the finance department deciding to keep random transaction documents called 'Payment Final' in randomly named folders such as 'John's Work'.

There is no argument that this would be unacceptable. Treating information so lackadaisically, however, is often accepted or overlooked. But then as a fellow information management professional, you know this.

Entering a new role six months ago, I inherited a functional activity classification system. The permissions, file structure and theory work very well and some teams use it effectively. However, due to a high staff turnover, there was a lack of understanding of how and why the files were organised in this way. Consequently, some members of staff save files locally, which jeopardises business continuity and can result

in information not being backed up. One of my first tasks has been to remind my colleagues of the benefits of the system and explain why it is worth using despite it not being the same as at their last organisation. It has been a learning curve in communicating effective information management.

I summarise my top five lessons below in the hope it will benefit those in a similar position or considering starting to use a functional activity model.

1. Never name the branches after a department, even if that department is actually named after the function. For example, an obvious function is finance. However, most teams that primarily carry out this function are called 'finance'. Calling your functional file 'finance', though the most logical name, will confuse and lead to departments being possessive about 'their areas'.

2. Sell, sell and sell again. My predecessors had done a wonderful job with ensuring there was buy-in across the whole organisation before implementation. They had worked with every function to develop a useful filing structure and had done follow up workshops to ensure everyone was happy. With staff turnover and people changing roles, it is important to keep up the momentum and constantly revisit and sell the classification system again.

3. Avoid jargon but sell as a designed and universally used model. It constantly amazes me when people think information management makes working efficiently more difficult. One astounding example I found early on was that some new staff thought a predecessor had made up the functional activity model because they hadn't been at the organisation when it was implemented. The problem is that the uptake of the structure then balances on that person's influence and authority. Sell it as best practice and theoretically proven.

4. Get staff to own it. Support staff to review their own areas and to have sessions where they can troubleshoot any problematic parts of the structure with you. Find what will sell it to top management and push that message. If management use it so will their teams.

5. Make sure everyone trusts the security. One problem with take-up is that staff save sensitive files locally because they don't trust the shared filing system. This is particularly problematic when these are the files that

“ *Due to a high staff turnover, there was a lack of understanding about how and why files were organised* ”

are most likely to be needed for business continuity. We promote the idea that the files are 'open unless proven otherwise' so the onus is on the user to double-check any new areas are locked. When an area is locked down we rename the folder with a jointly agreed sign. For example, any private sections for the human resources team are called 'HR <filename>'. It doesn't actually change anything but provides a visual indication of when access controls are in place.

Despite some teething problems and the brain-numbing task of constantly repeating key messages about our functional activity model, I would still say this is the best option. A sudden increase in staff turnover recently has proven beyond doubt that, if used properly, it ensures our valuable information assets remain in the organisation.

As more organisations move to cloud based storage solutions, as is mine, it is vital that there is a strong culture of good records management embedded before the transition to a new system. That said, I still have a long way to go before every member of staff effectively uses our functional activity system. If you use such a model, I'd be interested to hear how you encourage buy-in, perhaps share some ideas, or answer any questions. Please feel free to contact me on sunny.seregen@stjohnsbath.org.uk.

Sunny Seregen

St John's Foundation, Bath

There are proposals for three standards on records management in 'the cloud'; image by Jack Moreh from Stockvault



The revised ISO 15489 and what's next

Rod Stone offers a personal view.

After four years' work, the revised international standard for records management - ISO 15489 - was published in April 2016. For a view on the work that went into development of the revision, go to two articles published in ARC Magazine in November 2013 (No.291) and March 2014 (No.295).

The original ISO 15489 published in 2001 was ground breaking - the first international best practice standard for records management - and it was

successful. ISO 15489 sold well - for BSI it was a high revenue earner. It was translated into at least 20 languages and adopted by over 25 national standards bodies.

The revised ISO 15489 has some significant changes. The original standard was essentially one document split into two parts - Part 1: general and Part 2: guidelines. One could have knitted them together to make one standard. The revised Part 1 has the new subtitle 'concepts and

principles' and the plan is to produce a number of lower level documents in place of the old Part 2.

There's a new focus on metadata as an essential component of managing records - both metadata for records and producing records metadata schema for an organisation.

Most controversially, there's a new section covering what the standard calls 'appraisal'. Appraisal, the standard says, covers the processes

“The original ISO 15489 was ground breaking. It was translated into at least 20 languages and adopted by over 25 national standards bodies.”

of evaluating business activities to determine which records need to be created and captured and how long the records need to be kept. Records managers and records management in the UK have traditionally focused on retention and reviewing records for disposal - and used the term appraisal as part of that activity. Having moved into documenting what records to create and capture, records managers hadn't to date created a term for this activity. It's a little confusing but widening the use of the term does fill a gap in our terminology.

But much of the revised ISO 15489 is substantially the same. There is still a section on policy and responsibilities - it's section 6 in both the old and new. Monitoring and auditing are moved into the policy section, as is training, which is retitled 'competence and training'. The list of 'characteristics of records' and 'characteristics of records systems' remains and the text in each of these sections is largely unchanged.

ISO 15489 is the responsibility of the ISO Records Management Committee which now meets annually. The most recent meeting was in May 2017 in Pretoria, South Africa at which there were over 40 delegates from 13 countries (Australia, Canada, China, France, Kenya, Korea, Netherlands, New Zealand, South Africa, Spain, Sweden, UK and the USA).

The focus of two working groups at the Pretoria Records Management

Committee meeting was the development of replacements for the old Part 2 of ISO 15489. There are two documents currently in preparation which will cover 'appraisal' and 'records systems'. The intention is that these will be published next year.

Away from ISO 15489, a number of other working groups have got onto broadly the same issue: the need to set out records management requirements for non-records managers, whether that's 'enterprise architects', data managers and the like, those interested in 'open data', 'big data', 'blockchain' and 'the cloud'. This is a welcome development. Providing a bridge between allied disciplines and service providers that need to work together but don't share the same language is where standards come into their own. Also, in producing a standard, different disciplines and providers are forced to acquire a greater understanding of the other areas and to make their principles, practices and terminology clear.

A standard for records management for 'enterprise architects' is probably the most advanced with a plan to publish next year. There are also proposals for three standards on records management in 'the cloud'.

Rod Stone

UK Delegate, ISO Records Management Committee

Commissioning a new storage system?

Rob Dakin explains how to get what's best for you.

Previously in ARC I have written various tips and hints about physical system elements for archive storage, but I thought it worthwhile to address the whole design and procurement process for installation of a new archive system - as often this is where the client's needs can 'fall through the cracks'.

In the course of over 30 years working in the shelving industry, I have met with clients who, for whatever reason, didn't buy their desired solution. Clients have sometimes ended up with second best - something that didn't quite fit the bill as they expected.

Often, this is because the process of buying storage systems is carried out by third parties and there is the potential for you to lose control. As a result, even the slightest variation in specification can have an enormous impact on the function and quality of the final archive system.

In one recent example I came across, a simple misunderstanding about the width of shelf bays between contractor and storage supplier resulted in a 15% reduction in archive capacity. When the client came to decant into the space, they found they could fit only six boxes per shelf, rather than the planned seven. In the end, the client had to pay to re-box all of their stock, a time consuming and costly exercise.

Let's say you are in the fortunate position of looking to upgrade your storage system, or thinking of designing a new archive. How does the process work best? How do you ensure you get what you really need?



Lapworth Museum of Geology stores before the new storage system was installed

In the majority of successful archive system installations, the design is invariably undertaken by two people - the archivist and an experienced storage system project manager, discussing the desired outcome, and the art of the possible. Often this discussion takes place before any tender, new build or purchasing process has begun.

If I were to draw up a set of guidelines for archivists who are in the process of commissioning a new archive space, I would recommend the following:

- Speak to a range of storage systems specialists to ensure you know all available options;
- Always seek advice from shelving companies with a proven track record and - more importantly - ensure the individual assigned to your project has solid experience in archive design;
- Get robust budget costs to ensure the monies are there for your requirements;
- Explore a variety of possible specifications and layouts which answer your needs - there are usually many options;
- No matter who supplies your storage system, make sure you end up with something that is designed for you, and approved by you;

- Where possible, avoid choosing a list of approved storage providers and then hand control and choice of these over to a third party to make the system choice;
- Always maintain an open dialogue with the supplier over the specification and layout. Your contractor doesn't have to live with the system - you do.

A complete overhaul of an archive or repository's storage system is an opportunity that falls to an archivist perhaps once or twice in a career, and the system they commission may well outlast their own tenure. Enlisting the help of experienced advisers from the storage industry - for whom the process of space planning and design is part of their everyday working lives - will guarantee the function and capacity of your archive system now and into the future.

Rob Dakin

Bruynzeel Storage Systems

A digital landscape: PRONI's historical maps viewer

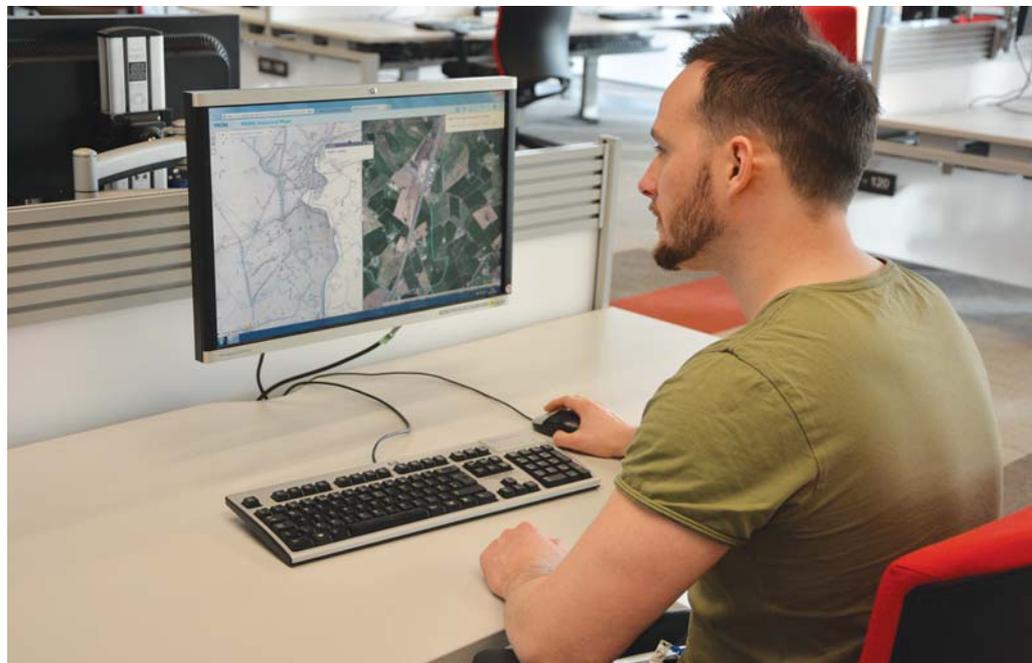
Janet Hancock celebrates the launch of a new online resource.

Maps offer a wonderful record of the growth and development of our landscapes, townscapes and ultimately our local communities. In comparison to other types of record, maps can offer a more accessible means of interaction with the past and present for a much wider section of the population, particularly younger people.

Almost all of us are familiar with modern maps through global online mapping tools (of the Google variety). When presented with an historical map, most people immediately set about looking for familiar landmarks and street names, plotting their local knowledge against the record in front of them. In short, historical maps can facilitate engagement with records effortlessly and without many of the typical user preconceptions: that they wouldn't understand what they are looking at; and that records just aren't for them....

Earlier this year, the Public Record Office of Northern Ireland (PRONI) launched its latest free to access online application, the PRONI Historical Maps Viewer. Developed in collaboration with Land & Property Services (LPS), the government agency responsible for Ordnance Survey Northern Ireland (OSNI), the Maps Viewer provides access to almost 1,500 geo-referenced historical OSNI maps from the PRONI archive.

Dating from the first OS map edition of 1832 and running up to 1986,



©Public Record Office of Northern Ireland (PRONI)

there are five iterations of the six inch County Series and a further two from the later Irish Grid series available. Contemporary mapping numbering almost 600 modern OSNI map sheets and around 4,000 aerial images are also included, provided by LPS. Maps cover the six counties of present-day Northern Ireland and users can browse or search for a location using either a current postal address or the standard name of a townland, civil parish or town/village/city. Using the overlay, transparency and swipe features, researchers can compare and contrast historical map editions with one another, or with a contemporary basemap.

Underpinning the application is a wealth of additional detail. Landmarks and buildings of interest annotated on the maps (such as churches and schools) have been geo-referenced and organised into themed datasets. Another dataset of information on almost 16,000 historic and archaeological sites from the Historic Sites and Monuments Record

has also been included, provided by the Historic Environment Division which, like PRONI, is a division within the Northern Ireland Department for Communities.

It is appropriate that we mention communities at this point. In the context of Northern Ireland, geography can be a particularly contentious issue. Many areas - and the people who live there - can be defined along religious or political lines. PRONI contributes to the NI Executive objective of fostering community cohesion in Northern Ireland by providing a neutral space and promoting access to the records which document our past. There is an obvious use for maps, particularly historical maps, both in celebrating the unique attributes of local communities and challenging the physical and psychological barriers associated with perceptions of place.

By offering members of the community this accessible online platform for

access to maps, archives and records can be used to help people explore how landscapes have evolved over time and visualise how the places they know so well nowadays may have looked different in the past. By examining the history and growth of their local areas, communities themselves may develop a greater understanding of the place where they live and the heritage they share with others.

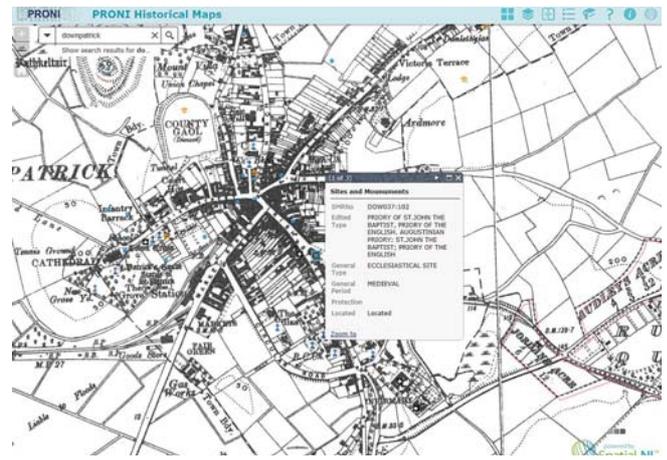
The PRONI Historical Maps Viewer is an important resource for a wide range of user groups, including family and local historians, researchers, academics, students, legal professionals, planners, and the general public. In addition to the inherent value of the maps, the inclusion of townland and parish boundaries as a searchable dataset also provides a useful spatial reference which can help researchers contextualise other sources. Traditionally, many public records are arranged according to historical administrative land divisions. But it is often difficult for researchers who do not know an area to ascertain the proximity of one place to another when geographic references are laid out in linear or alphabetical fashion within a document or file series. In contrast, an ability to visualise the landscape and its place-names can help researchers to identify areas where they could logically extend their investigations and/or interpret the evidence.

Like most, PRONI has finite resources. The development of the Historical Maps Viewer has been made possible by the Northern Ireland Mapping Agreement (NIMA) which, through LPS, provides access to contemporary mapping and spatial data and offers Geographic Information Systems (GIS) technical support to participating government departments. This application is an example of how partnerships - combining the resources and expertise of two or more organisations – can be utilised to produce high quality digital archives, records and resources in a cost-effective way that supports the remits of all partners.

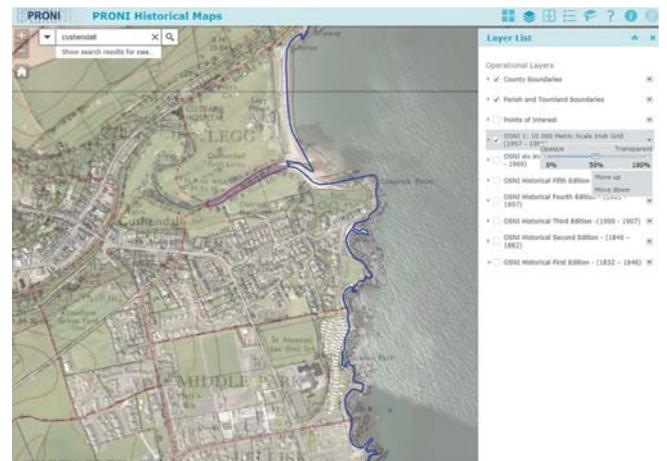
You can access the PRONI Historical Maps Viewer at www.nidirect.gov.uk/proni.

Janet Hancock

Public Record Office of Northern Ireland (PRONI)



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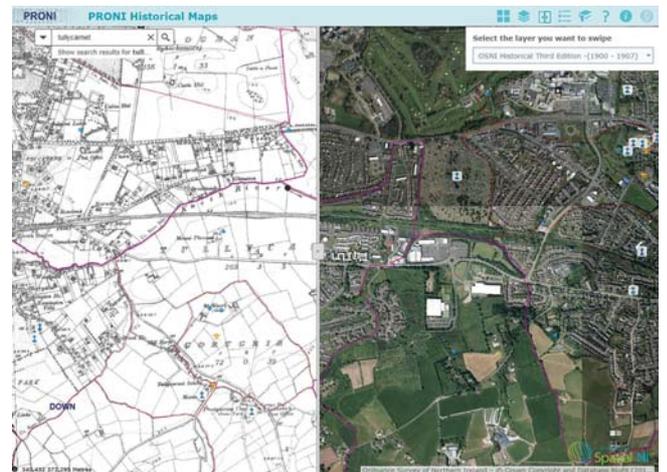
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Know Your Records

Phase two Training: Risk, Internal Advocacy and the Records Manager



First session: Section for Records Management and Information Governance AGM, London, 24 July

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Contact: ARA's Head of Public Affairs if you'd Like to Host a Session in your Nation/Region.

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