



Archives & Records  
Association  
UK & Ireland

# arc magazine

No: 365

December 2019

[www.archives.org.uk](http://www.archives.org.uk)

ISSN 2632-7171



Third Party Compliance  
Model Records Management Plan Review  
NRS PRSA Stakeholder Forum  
25<sup>th</sup> August 2018

Heather Jack

## Records Management

**12** Engaging  
with records  
management

**16** How data protection and  
records management can  
help each other

**23** Digital culture  
change





Crowne Plaza, Chester  
2nd – 4th September

Conference  
2020

We ♥ Records



# Welcome...



## Welcome to the Records Management issue of ARC

It's easy, as an archivist or a conservator, to ignore records management as the slightly more intimidating side of our profession. Whilst we might recognise its importance, we prefer the fun of the historical stuff. I remember being very sceptical when my course organiser tried to convince us that when she was both an archivist and records manager, the records management side was the most interesting part of the job. However, this records management issue shows that perhaps she was correct!

Records managers are grappling with questions of geopolitical conflict (have a look at Kolya Abramsky's article), personal data and engagement with their field. Is it just me, or is that list suspiciously similar to questions asked by those who work with archives? The question of engagement is particularly key. Whether you're a conservator, records manager, or archivist, you will have spent much of your time persuading people of the value of your work. If you'd like to get some more ideas for engaging internal audiences, be sure to read Chloe Anderson's article on page 12.

Indeed, many of this issue's articles also highlight the crossovers (who doesn't love a crossover episode?)

of our fields. Both Kevin Wilbraham and the PRSA team at the National Records of Scotland examine responses to previous failures in recordkeeping. These failures have made both archivists and records managers step up and re-examine their practices for the better. They have also underlined the importance of our professions, where access to records really can be lifechanging.

Many thanks to Edward Ratcliffe for helping to wrangle the records managers and pull this issue together. I would also like to thank our interviewees, Rosie Al-Mulla and Tom Wales for so speedily and cheerfully getting back to me.

**Kim Harsley**  
*ARC Editor*

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Front cover: Meeting of Stakeholder Forum in July 2019. Courtesy of Hugh Hagan, National Records of Scotland.

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ARC Magazine design by Glyder [www.glyder.org](http://www.glyder.org)

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# Opening lines

## Exploring the ARA

**Karyn Williamson**, ARA board member and archivist for Standard Life, gives us some insider information on what it's like to be on ARA's board.



It's been a jam packed six months since I was elected to the ARA Board in May. After the AGM, the board attended a two-day session where we met each other and were given our portfolios. Although the board are responsible for the overall running of the organisation, we are given specific areas to focus on. Some of us, including me, also take on additional projects where extra work is required on a particular area we have experience in. I was allocated the specialist groups and sections portfolio and have also been working on the Explore Your Archive campaign.

This portfolio focuses on most of the specialist interest groups and sections ARA members can join for free as part of their membership. This includes:

- Archives for Learning and Education;
- Business Records;
- Film, Sound and Photography;
- Specialist Repositories;
- Community Archives and Heritage Group.

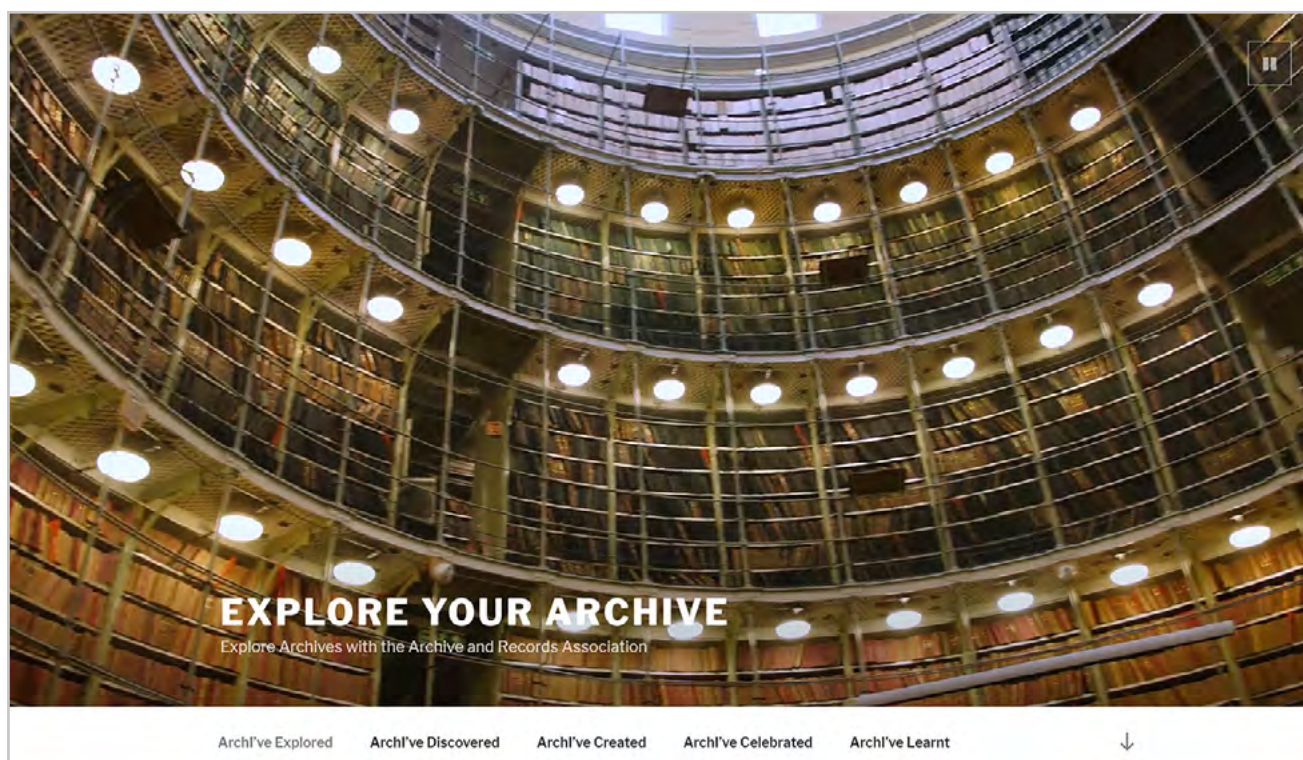
There are also a number of smaller groups affiliated with ARA which are supported by this portfolio including:

- Religious Archives Group;
- Charity Archivists and Records Managers Group;
- Health Archives and Records Group.

A lot of the work involved in this portfolio is done behind the scenes. This means that the results are not immediately visible to our members unless you are one of the 400+ volunteers. It also involves lots of collaboration with Stephen Scarth, the nations and regions portfolio holder and Jason King, the standards and innovation portfolio holder. Our main role is to support the committee members of these groups and ensure they operate within ARA's policies and procedures. It is important all the groups work to a similar standard, to make sure our members receive equal treatment in terms of CPD opportunities. Another part of my role this year is to work on establishing a new sporting heritage section

**ARCHIVE**  
**EXPLORED**  
**DISCOVERED**  
**FOUND**  
**DETECTED**  
**CONNECTED**  
**ENGAGED**  
**UNEARTHED**  
**LEARNT**  
**IMAGINED**  
**CREATED**  
**UNLOCKED**  
**OPENED**  
**REVEALED**  
**CELEBRATED**

“The ARA is an organisation which is constantly changing and evolving”



The updated Explore Your Archive website, courtesy of Karyn Williamson

for those interested in the sporting collections held across the UK and Ireland.

At the ARA Officer's day in October, we hosted a workshop to ask committee volunteers what they thought their particular roles currently involved and any improvements or additions they would make. This feedback and workshop output are being used to put together an officer's handbook, which will provide a starting point for everyone volunteering with the ARA for the first time. By improving the running of the organisation, we hope to provide a more cohesive service to our members and maximise on the work produced by each group. This will in turn free up the time of board members to focus on special projects which need some extra focus.

One such project I've been involved in is the re-launch of the Explore Your Archive campaign. On the 25th November, a brand-new website was launched at the ARA Scotland Explore Launch event at the National Records of Scotland in Edinburgh. The new website has:

- an updated toolkit and range of other resources to be used by anyone who wants to get involved in the campaign;
- a dedicated page of learning aids and guides to be used in schools and community groups to teach as many people as possible about what archives are and why they matter;
- sections for records management and conservation;
- the ability for users to upload their own events to the site and contribute blogs telling the world what they've been working on in their archives.

The social media campaign ran for the full week with a range of daily hashtags which saw millions of people interact with archives in some form. It is hoped the campaign will go from strength to strength and continue to help raise awareness of archives and records.

The Explore Your Archive campaign is about more than advocacy for the sector. It provides a link between every archive and recordkeeping service across the UK and Ireland. Despite differences in collection size, content and resource, everyone comes together to celebrate records and the impact they have on the world we live in. That is something to be celebrated every day of the year.

If you haven't already, do some exploring at [www.exploreyourarchive.org](http://www.exploreyourarchive.org) or go to @exploreachives on Twitter. Any feedback or suggestions for additional content should be sent to [eya@archives.org.uk](mailto:eya@archives.org.uk). What we've learnt from producing the Explore Your Archive website will be put into practice when we start work on developing a new ARA website in early 2020. The ARA is an organisation which is constantly changing and evolving and I'm proud to play an active role in making change happen. I would encourage anyone thinking of volunteering for ARA to get in touch. Together, we can make a difference.

*“Everyone comes together to celebrate records and the impact they have on the world we live in”*



# Professional development news

## Registered Membership now open to all members.

ARA pilots a new approach for members looking to qualify as a Registered Member of the ARA.



Members may recall that the Registration Scheme offered two routes to enrolment: a route for graduates of ARA-accredited post graduate courses, and a route for those who were not, known as the experience route. These two routes ensured that Registered status was within the reach of all those able to meet the assessment criteria, regardless of academic background. All candidates had to meet the same standard to qualify, regardless of the route taken.

The new Professional Development Programme, which replaced the Registration Scheme in 2017, ushered in a new competency-based approach to qualification as a Registered Member of the ARA. A priority has been to continue with an experience route to enrolment and, following consultation with the Forum for Archives and Records Management Education and Research (FARMER) and ARA assessors, the ARA Board agreed in August to open enrolment to all ARA members, regardless of their level of experience or academic qualification.

To help potential candidates judge whether they have sufficient experience, the ARA makes the following recommendations for those thinking of enrolling:

- Candidates with a post graduate qualification in a related subject (including international Archives and Records Management qualifications) may require 12 months' relevant work experience after graduation.
- Candidates with a degree in a related subject (including international Archives and Records Management qualifications) may require 2 years' relevant work experience after graduation.

- Candidates with qualifications below the degree level may require 4 years' relevant work experience.

The recommendations are there to guide candidates. The only way to know whether you have what it takes to qualify as a Registered Member is to self-assess your work experience against the competency framework. If, as a minimum, you can demonstrate five competencies at level 3, and three competencies at level 2, then you meet the qualification criteria. All you need to do is develop your application and pass the assessment process.

By removing the requirement for an ARA-accredited university qualification, the ARA is reaffirming its position as an inclusive professional membership organisation. High standards remain, as all candidates enrolled onto the Registered Membership programme, regardless of academic qualification, must meet the same standards in order to qualify. We will pilot this approach for 12 months before reviewing the outcomes.

Reaching out to a wider range of individuals will help attract and retain talent in the sector. Michelle Kaye, Collections Development Officer at The Glasgow School of Art said "I'm delighted that the ARA has recently chosen to open up its Professional Development Programme to a wider audience and now allows for those without a qualification to be eligible to apply for Registered Membership (RMARA). As a result, this new approach will enable a broader range of archive professionals to engage with the scheme at the Registered level."

Karl Magee, chair of the ARA, explains the strategy behind this decision. "We're leading a more inclusive

approach to recruitment, retention and promotion of talent across the record-keeping sector. Our Professional Development Programme, and the planned record-keeping apprenticeships in England and Wales, will provide alternative route into the profession. We call on employers to recognise and support these initiatives.”

We'd love to hear your views on the new approach to enrolment. Please email [chris.sheridan@archives.org.uk](mailto:chris.sheridan@archives.org.uk).

**Professional Development Programme  
Congratulations to:**

Chloe Anderson FMARA,  
Rory Powell FMARA  
Timothy Jerrome FMRA  
for their recent qualification as  
Foundation Members of the ARA.

**Congratulations also to:**

Adrian Steel RMARA,  
Alison Mason RMARA,  
Caroline Sampson RMARA,  
Eleanor Gawne RMARA,  
Elizabeth Oxborrow-Cowan RMARA,  
Gavin McGuffie RMARA,  
Hazel De Vere RMARA,  
Heather Forbes RMARA,  
Liz Street RMARA,  
Maria Castrillo RMARA,  
Ruth Reed RMARA,  
Sara Kinsey RMARA,  
Sarah Garrod RMARA,  
Sue Baxter RMARA,  
Teresa Doherty RMARA,  
Timothy Harris RMARA  
William Stocking RMARA  
for completing their CPD Reviews.



## Correction

Huge ARC Magazine apologies to Michael Welsh of NSPCC Archives, for misspelling his surname in our November issue. It is of course Welsh and not Wells. So sorry Michael.

# Collecting matters

**Caroline Sampson**, Development Manager at The National Archives, describes a new management framework for charity records that will benefit archivists and records managers alike.

In June 2019, The National Archives published a management framework for retention and selection regarding charity records and archives. Charities and voluntary organisations play a significant role within our society, and we received feedback that it was important to develop resources to support recordkeeping within the third sector. The framework is the result of this feedback from those working in charity archives.

The new framework unites archival and records management approaches to retention, providing model rules for retention throughout the record lifecycle. Archivists and records managers share a common interest in managing the record lifecycle, and the model framework provides tools that both professions can use to manage each stage.

“*Archivists and records managers share a common interest*”

Records managers are concerned with the earlier stages of the record lifecycle and the primary value that records have, typically expressed as retention schedules. Archivists are concerned with the latter stages of the lifecycle, taking into consideration both the primary and secondary values of records. These values inform the development of tools such as selection criteria, which the framework now includes.

The framework also explores options for records transfer: the action of moving records from active use to the archive as a natural part of the record lifecycle. Transfer may be internal, occurring within an organisation when a record moves from a repository or from individual custody to its archive. It may also be external if records are transferred from the charity or voluntary organisation to a third party.



# Backchat...



This month **Kim Harsley** meets **Rosie Al-Mulla** and **Tom Wales** who are both on the committee for the ARA Section for New Professionals. Rosie works as an archivist at the University of Stirling. Tom is studying on the archives and records management course at University College London whilst also working at Churchill Archives Centre.

## To start with tell us how you got interested in archives and records.

**Rosie:** I always feel like I clocked onto archives later than lots of my peers who mostly seem to have handled them somehow at university. I really only stumbled across them working for National Galleries of Scotland. In addition to my shop job, I was volunteering on a short-term project in the picture library and my manager there thought I might like to volunteer in the archive. As it turned out, that was one of the best suggestions anyone has ever made to me!

**Tom:** Like Rosie, archives always seemed to be in the background. Studying history was my way-in and while studying I got a feel for the impact records could have. I volunteered with a charity that helped academics in Syria during the civil war and I saw how our management of records could affect people's lives.

## Did you learn anything during your early records experiences that you still think about today?

**Rosie:** I absolutely loved working with the archive collections at the Scottish National Gallery of Modern Art. I was really lucky to be given a good amount of responsibility including CALM training. The team there is small and lovely, so there was lots of support. I think there are two key things that I still think about from my time there. First of all, is how to treat volunteers – I had a really wonderful experience and was given so many opportunities to improve my skills which also helped me figure out if I wanted to do this job. I hope I'm even half as supportive of the volunteers I work with! Secondly, a gallery environment was a really interesting place to start in terms of thinking about outreach and engagement. There has been something really beneficial

about considering how to display and communicate material from archives right from the start of my involvement with them.

**Tom:** I couldn't agree more with Rosie, I was fortunate enough to volunteer in some really supportive environments where people were open to share and provide an environment where you can learn. The BT Archives at Southwark Local Authority opened my eyes to having an impact with limited resources. I was trusted from the outset and given responsibility with readers. It was a fantastic opportunity for me to learn from them and interact with readers and material. Ultimately, what I took from all my volunteering was the importance of a coherent and encouraging working environment.

## What do you think the benefits are of being a new professional?

**Rosie:** I find myself saying this to a lot of new professionals – don't underestimate the benefit of having a very up-to-date records education. You may end up working with colleagues who haven't received training in copyright for a long time or who never studied anything to do with digital records. Over time you need to keep on top of this knowledge but being fresh out of your qualification does mean you have a pretty up-to-date skill set. Take advantage of that!

**Tom:** It's great to feel part of a community. Hosting and co-hosting events is a great way to do this but more informal meet-ups are also worthwhile. This helps to keep you grounded and be aware of other's perspectives and working environments – it's a very small world!

“ I think horizon scanning is an important part of any profession, the more warning we have for key changes, the better prepared we can be. ”





Courtesy of Rosie Al-Mulla

### **Who or what inspires you?**

**Rosie:** I get a lot of inspiration from the people within the collections that I work with. Finding a remarkable person or an organisation just makes me feel like I want to do my best to share that story, even if it's just with one researcher.

**Tom:** People in the field inspire me regularly, especially work like the MIRRA Project at UCL (Memory – Identity – Rights in Records – Access) which has made a fundamental difference to people's lives. We often forget the positive work the profession can and does do.

### **What are your interests outside the job? Have they ever impacted on your professional life?**

**Rosie:** I have always spent a lot of time in galleries

**“We often forget the positive work the profession can and does do.”**

and museums and, just like my previous work experience, it's a great source of ideas for engagement, outreach and generally thinking creatively about collections. Not everything is about work though! I am trying to have a cup of tea on every continent before I die.

**Tom:** Not so sure about the tea thing myself... I love music and collecting records \*insert archive joke, here\*. Playing a lot of cricket has had a positive impact

on my ability to work in a team; cricket is often about sacrificing what is best for you, and prioritising the result. Maybe one day I'll get myself into the Lord's cricket ground archive... one day!

### **What has surprised you most about the profession? Is there anything that is completely different to how you expected the job to be?**

**Rosie:** It's surprised me how collaborative a sector we are. I always had the impression that the world of work was a 'dog eat dog' world - the record keeping sector is not like that at all! I couldn't believe how willing people were to share their experiences and teach me how to learn from their mistakes. And in turn I've become used to more public speaking than I imagined would be a part of my job, sharing our own successes and things we'd like to improve on.





Courtesy of Tom Wales

**Tom:** I couldn't agree more, people are so open to sharing their experiences – good and bad, it's really important as a profession to realise that we are allowed to be fallible. I had very little idea that the profession could be so open to sharing ideas, so that was really welcoming and encouraging.

Personally, I'm still struggling with the idea that as a profession there is a lack of awareness around what recordkeepers 'do'. I believe that we need to address this and put ourselves out there to create change. Part of that is undertaking work to show people the importance of what recordkeepers do in the public eye.

### What made you get involved with ARA?

**Rosie:** My colleague forwarded me an email about the Section for New Professionals summer seminar in 2017. I went along and found out about the committee position that I now hold – and I've never looked back!

**Tom:** For me, as with any profession or organisation, you need to be part of it to have an impact. As digital training officer I feel that there is a chance to make training more accessible across the country but also to enhance the knowledge within the profession. I have a responsibility to work hard for the profession I am part of and contribute to that.

### What are the main challenges ahead for the profession? How do you feel about tackling them?

**Rosie:** I think

horizon scanning is an important part of any profession, the more warning we have for key changes, the better prepared we can be. It's important not to be so engrossed with how we currently do things that we can't see the changes coming.

**Tom:** I completely agree with Rosie, we cannot tackle challenges without first acknowledging that they exist. We need more voices and influences across ARA and recordkeeping workplaces, by recognising that we can move forward and hopefully make substantial change. I believe this can only be achieved collectively by listening, engaging and learning from people across the sector.



# Chair's welcome

**Edward Ratcliffe**, Chair, ARA Section for Records Management and Information Governance welcomes you to our issue

As we all know, managing information is working with people for approximately 99% of your time. Preparing guidance, advocacy, responding to requests, championing information governance, working on projects, providing advice to people... it's all about engaging our customers. But this is why we do it! We all have to be people people.

It therefore came as no surprise to me that the submissions for this Special Records Management Edition of ARC Magazine showcases the diverse nature of how we engage with people – and from a range of amazing contributors. It goes without saying that there is a huge thank you to all of them.

One thing that certainly has impressed me is the range of scope in these articles – submissions from records managers at all stages of their careers and covering an incredibly diverse range of topics which no doubt will be of great interest. Above all, what comes through in all these articles is the communication skills that all our contributors have in bucketloads.

The Section for Records Management and Information Governance – is here to recognise and support the 'R' in the ARA. You are very much our customers! We recently ran a membership survey, the results of this are on the ARA webpages. From this we have some very clear actions for the section to deliver on. A massive thank you to all that contributed to the survey.

But we want to continue to serve you. If there is anything you want to ask us, or any way we can work better then do let us know. After all, we're people people too!

# Engaging with records management

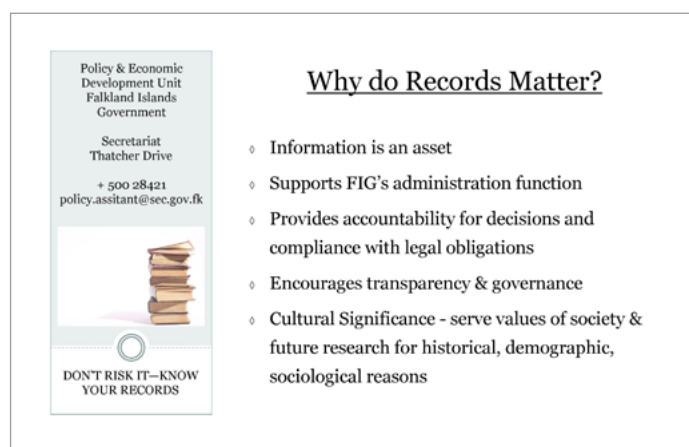
**Chloe Anderson**, records manager and policy officer at Falkland Islands government, highlights the importance of engagement to records management and describes her own experience at the Falkland Islands government.

Records management is a field which many outside the profession acknowledge as important but remain unaware of the role they play in determining its success or failure. The policies and procedures surrounding the management of records rely on staff capturing their records and retaining them in the appropriate way. This means that the role of a records manager to engage with various internal and external groups is vital in supporting a culture of good governance. My own experience within the Falkland Islands government has highlighted the impact of effectively engaging with different groups, to raise the profile of records management and ensuring that its processes are supported by all staff.

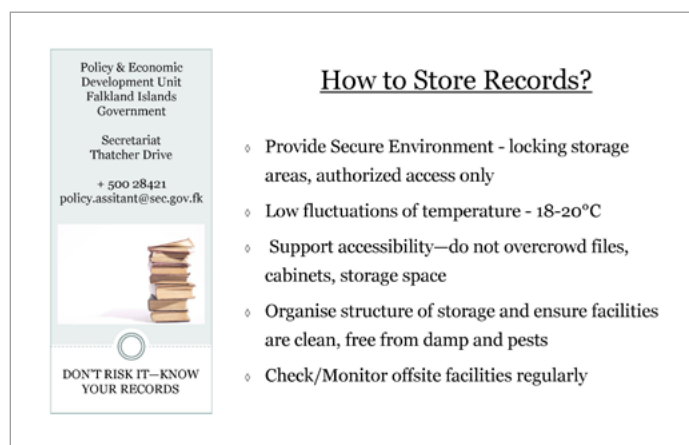
## Gaining support

When I started in August 2017, there were no formal record management processes or policies within the Falkland Islands government. To overcome this, it was imperative that I gained the corporate backing of key government stakeholders. Directly engaging with senior management, I gave a presentation alongside a report which focused on the positive impact that a records management policy would have on accountability and administration. I ensured that key messages were targeted towards my audience (namely government directors and the chief executive) and provided a corporate justification for a formal records management programme. I presented the current risks but marketed weaknesses as opportunities. The policy was approved and supported by all, marking a significant commitment from senior management to support the development of records management.

Alongside engagement with senior management, individual interactions with staff are equally important. Engagement with the people who deal with records daily allows key processes to be performed and underpins the role of records management. A particularly rewarding exercise I undertook was to hold group training sessions, introducing them to records management and the



Corporate records management advocacy cards.  
Courtesy Chloe Anderson, Falkland Island Government.



Corporate records management advocacy cards.  
Courtesy Chloe Anderson, Falkland Island Government.

newly approved policy. By communicating directly with these internal stakeholders I was better able to understand their specific challenges and gain feedback on what they wanted from a records management programme. Discussing records management in such an open and transparent way allowed me to introduce them to unfamiliar processes, such as record retention schedules and asset registers. Explaining these terms and providing example templates made staff more enthusiastic and willing to make changes. Moreover, the feedback received allowed me to develop specific guidance on managing electronic records and identify areas for future training sessions.

### Remote engagement

Whereas direct communication has proven effective for my organisation, many record managers may not have this opportunity. Remote engagement is another way to advocate for records management that can be equally rewarding. In an attempt to raise awareness of records management, I created small business cards containing guidance on simple records management procedures. These cards covered a range of issues including:

- disposal of records
- file naming
- records retention.

Though an unusual method, these cards communicated key information concisely without overloading staff and also engaged external stakeholders. Remote engagement can be undertaken without the involvement of a records manager. Identifying advocates in different areas provides a way for key messages to be distributed, as those individuals positively influence others to following guidance and adhere to new policies.

### A recipe for success

The success of each engagement was down to changing the format and messaging to suit the audience. The presentation and report to senior management were very formal and focused on the wider high-level benefits to the government. This contrasted with staff engagement which was less formal and provided a way to project my enthusiasm for record-keeping, as well as giving staff instant support. Communicating at an individual level made the biggest impact. Two-years on, the Falkland Islands government have allocated specific funding and made numerous changes to implement formal procedures. Without building these relationships with people, my role would have been more challenging as staff would not be as willing to make changes or support a culture of records management. Stakeholder engagement is as much a function and product of records management as the policies and processes. Adopting new methods of engagement furthers the impact of records managers and ultimately strengthens the profession.



# The five pillars of a data-driven organisation

**David Fathers**, Crown Records Management, describes how your organisation can truly be 'data-driven'.

In the Crown Records Management's survey of one hundred chief information officers in large UK organisations, data was ranked as the second most important corporate asset. It even scored higher than employees, reputation and products. However, only one in five chief information officers said they had a very good 'relationship' with their data, so how can the rest optimise their data assets to the full? There are five key measures they should take.

## Effective compliance

This year Google was fined a record £50m by France's data protection watchdog for not being clear enough about what they do with user data. The financial and reputational repercussions can be huge for organisations that aren't GDPR compliant. Our research shows that on average only 23% of organisations said their GDPR compliance was 'very good.'

To bolster data regulation compliance, organisations should do the following:

- **GDPR effectiveness:** go through each factor of GDPR and check compliance. Organisations should determine how quickly they can handle subject access requests.
- **Unstructured data:** determine where all information is held and what it contains. If it's unclear, the organisation might benefit from an information audit.
- **Compliance audit:** ensure that the organisation has an effective compliance plan, which covers all relevant regulations and involves conducting a risk assessment in these key areas.

## Digital capability

100% of chief information officers believe that good data management plays an important role in successfully going digital. The digital journey can't be taken without access to the right data, at the right time. The two support one another.

Organisations should spearhead a digital transformation programme in the following ways:

- **From front to back:** allow the 'front end' digital changes, such as new routes to market and digital customer experience, to determine the back-end IT infrastructure and data architecture.

*“Productivity is the top benefit to reap from corporate data”*

- **Analyse first, then act:** tap into the organisation's data to understand what digital transformations are needed, instead of just reacting to pressure within the business.
- **Unlock those silos:** bring together different elements of organisational data. If data is integrated, organisations will have a full picture of all their information, meaning that crucial data won't get missed.
- **Be ready for more:** new digital processes will only mean new data being created. Organisations should ensure they are prepared for this and store the data effectively, compliantly and in an accessible format.

## Improving productivity

Our research found that information officers consider productivity to be the top benefit to reap from corporate data. Organisations should first consider data's potential in the following ways:

- **Automate manual tasks:** identify which tasks are labour-intensive and have the potential to be automated - for example data entry.
- **Highlight productivity gaps:** carry out business process productivity assessments and establish how data access could help.
- **Improve information access:** make the data more easily searchable by implementing an indexing tool.
- **Bring structure to unstructured:** make unstructured data, for example social media interactions, easy to access. They can provide valuable insights.

# 91%

**OF ORGANISATIONS SEE  
UNSTRUCTURED DATA  
AS A PROBLEM**



Research conducted in March 2019



# 16%

**OF ORGANISATIONS  
HAVE '20:20 VISION'  
WHEN IT COMES TO  
THE VISIBILITY OF  
THEIR DATA ASSETS**

Research conducted in March 2019

Research and images courtesy of Crown Records Management

### **Optimal security**

Nine out of ten surveyed find unstructured data a problem, with security cited as its number one risk. Organisations should take the following steps to protect this data:

- Security audits: carrying out regular audits of data risks and preventative measures will assess the organisation's current state of security.
- Data audits: similarly, organisations should audit what data they hold and where it is stored to know what security measures to put into place.
- Skills and education: employee data management is often the reason for security breaches, and that's why staff need educating on how to use and handle data responsibly.



“Data was ranked as the second most important corporate asset”

- Data amnesties: some employees may hold inappropriate data difficult to spot, e.g. confidential company records. If staff have a chance to hand over this kind of data, organisations can reduce the amount of unknown data they hold, reducing the security risk.

#### Maximum visibility

Only 16% of the chief information officers we surveyed claim to have a clear view of their corporate data. Not only does this make data access a challenge, the organisation risks falling short of data regulation compliance. To get a clearer view of data, organisations should do the following:

- New search tools: consider a tool that indexes all data and makes it easily searchable.
- Data policies: review internal data policies and check that structured data doesn't get stored in unstructured formats.
- Scanning and data extraction: consider improved document scanning services to improve data visibility.
- Collaboration platforms: reduce version control by introducing collaboration tools in key areas of the business.

Effective data management is the key to organisations knowing what data they've got, how secure it is, and how they can access it to achieve its best potential. Without that, different aspects of the business, from product quality to supply chain management will suffer as a result.

# How data protection and records management can help each other

**Gary Shipsey** explains how records managers and data protection officers can have a mutually beneficial relationship.

Data protection principles have always had a direct relation to records management, especially 'storage limitation' and 'data minimisation'. Beyond this, the two disciplines have become even more intertwined. Two examples from GDPR and the Data Protection Act 2018 highlight this. Firstly, the requirement that records of processing activities include the 'time limits for erasure.' Secondly, the need for an 'appropriate policy document' to explain the retention and erasure of personal data.

Similarly, the role of data protection officers (DPOs) will have some overlapping functions and interests with records managers in order



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to be 'involved, properly and in a timely manner, in all issues which relate to the protection of personal data.' With the penalties for non-compliance greater than ever, there is no better time for records managers (RMs) and DPOs to be working together to achieve their mutual goals. Three simple steps can help.

### **Ensure the value of both disciplines is recognised**

As professionals, DPOs and RMs understand the overlapping but different concepts, goals and benefits of data protection and records management. It has never been more important for all colleagues, particularly senior management and decision makers, to also fully appreciate these.

A good first step is ensuring the relationship between personal data and records is recognised and understood, so all colleagues increasingly recognise the value of managing both well. DPOs and RMs can work together on achieving this by linking the two disciplines and using real-life examples to bring both alive.

Colleagues should have an appreciation of how one record can often contain different pieces of personal data; that the definition of personal data is broad; and that the same piece of personal data may also exist in other records or datasets. They should understand there will be different data protection requirements, different retention periods and possibly other record-keeping standards for different records.

Ensuring colleagues reflect on the lessons learned from previous individuals' rights requests can also help, especially if poor records management practice affected the amount of staff time and effort required to comply within the 30-day response time. Together, the DPO and RM should demonstrate to senior management how both functions working together can improve efficiency across the organisation.

### **Work together and plan ahead**

It is vital to ensure clear accountability for the functions covered by the DPO and RM, and clear channels of communication between them. DPOs and RMs who sing from the same hymn sheet when talking to colleagues about the benefits of both their disciplines are more likely to succeed. This is because colleagues know where to turn for what advice, and any potential overlap should be met with a clear answer rather than a mixed response that detracts from the records management or data protection issue at hand.

### **Policies and procedures should talk to each other**

RMs and DPOs should work to ensure that, as a minimum, the data protection policy, records management policy and records retention and disposal schedule are aligned. These policies must link to each other, avoid duplication of content and use consistent and accessible terminology.

This will help ensure that the policies, procedures and system you need staff to adhere to are usable and can be applied as required. It should also mean that colleagues do not regard the data protection and records management requirements as at odds with each other. Aligned policies will show that data protection and records management work together to enable colleagues to meet their own strategic objectives.

# Dealing with the requirements of the Scottish Child Abuse Inquiry

**Kevin Wilbraham**, from the City of Edinburgh Council, discusses the surprising impact of responding to requests by the Scottish Child Abuse Inquiry.

The Scottish Child Abuse Inquiry was established by the Scottish Government on 1 October 2015 to look at the abuse of children in care for the period 1930-2014. The inquiry is independent and aims to raise public awareness of the abuse of children in care. It also aims to give an opportunity for them to publicly acknowledge their suffering and to validate their experience and testimony.

### **Responding to requests**

As a local authority which ran children's homes and provided residential care over this time with its predecessor bodies, the city of Edinburgh council falls under the remit of the inquiry. Like other local authorities in Scotland, the council has had to respond to notices given under section 21 of the Children's Act (Scotland) 1995 - the legal mechanism that allows the inquiry to request information and records from organisations. These have ranged from relatively straightforward requests, such as looking for information about named children and individuals, to more complex and detailed requests about council-run establishments and services.

The council has reacted positively in meeting these demands. Recognising the importance of the inquiry's aims, in 2016 the council created a dedicated project team, with representatives from across the council, including information governance and social work.





Archaic Recordkeeping by Kevin H. is licensed under CC BY-NC-ND 2.0

Responding to section 21 notices has been challenging. Aside from having to meet specified and testing timescales, the work requires empathy and emotional resilience. The team deserves enormous credit for their professionalism and dedication in dealing with a difficult area of work.

### The Shaw Report

The biggest issue, however, has been poor and inconsistent record keeping over the preceding decades. The records lack documented historical policies and procedures for a range of organisational functions, not just for social care but also for human resources, finance and records management. This was not unexpected as the same issues are evident across the Scottish local authority sector. In 2007, Tom Shaw published his independent report titled 'Historical

Abuse Systemic Review: Residential Schools and Children's Homes in Scotland 1950-1995'. This report found record keeping and the availability of records to be 'patchy' across organisations. It also detailed, in very stark terms, what can go wrong when records are not properly managed and valued. The Shaw Report set out the need for effective records management and played a key role in developing the case for national records legislation, resulting in the Public Records (Scotland) Act 2011.

### Improved access

To tackle specific issues around record-keeping and legacy records, the council agreed to the recruitment of two temporary archivists. Their work has involved locating, arranging, collating, and researching a wide range of source material held across numerous hard

**“** *It is not enough to create the right records and manage them appropriately, it is vital that those records are complete, relevant and accurate.* **”**

copy, microform, and electronic record keeping systems. Thanks to their efforts, there is now access to key record series to inform inquiry responses and a clearer understanding of how social work record keeping practices have changed over time. This has also helped the council respond positively to other related workstreams, including processing subject access requests from individuals who were in care.

The experience of doing this sensitive work has given the team skills useful for other areas within the organisation. This includes supporting individuals who were in care and are now seeking their records to confirm what they can remember, but also working with council services to improve current record keeping and recording practices. Identifying and fixing past data quality issues around client case files has been particularly important. It is not enough to create the right records and manage them appropriately, it is vital that those records are complete, relevant and accurate. As a result of the work of the project team, additional checks have been introduced to ensure that recording standards for such files are maintained.

This work has emphasised the importance of recordkeeping not only for explaining the past but also to help those in the future.

# The model records management plan is dead. Long live the model records management plan

The Public Records Scotland Act (PRSA) Assessment Team at the National Records of Scotland discuss the ground-breaking review and production of the Public Records (Scotland) Act 2011 model records management plan.

**T**he Public Records (Scotland) Act requires named public authorities in Scotland, including local authorities, NHS bodies, police and courts, as well as Scottish ministers and the Scottish Parliament, to prepare and implement a records management plan. To assist authorities, the Keeper of the Records of Scotland was required to develop, in consultation with stakeholders, a model records management plan and guidance on the form and content of this plan. The model plan, and its supporting guidance, were launched in August 2012, ahead of enactment of the legislation. It has been a useful tool for all scheduled authorities, helping them to comply with their statutory obligations.

## Collaboration

To develop the model plan, the Keeper convened a forum of information managers, archivists, policy and administrative colleagues from across the Scottish public sector, being sure to also include private and third sector organisations. This forum debated how we should best manage our authorities' public records and what was expected of a records management plan. The ground-breaking, collaborative initiative delivered the model plan and guidance which has served the community ever since.





Meeting of Stakeholder Forum in July 2019. Courtesy of Hugh Hagan, National Records of Scotland.

**“This new model plan stands testament to the power and influence that joint working can deliver”**

However, all guidance must be reviewed. So, in 2018 the Keeper reconvened the stakeholder forum to help review and adapt the model plan to better meet the changing needs of stakeholders. The forum relied heavily on colleagues from across the sector for venues, speakers and biscuits!

We could not, of course, accommodate over two hundred and fifty authorities at the meetings, so we published the proceedings and invited all public sector colleagues to participate remotely. The draft plan was further scrutinised by members using a collaborative tool offered by the Scottish government electronic records management platform. This facilitated meaningful collaboration, discussion and sharing of information between scheduled meetings.

### Considerations

The review needed to consider several things. Firstly, we needed to establish whether the model plan remained fit for purpose. The second area of major importance was data protection legislation. Colleagues were keen to ensure that the model plan robustly addressed the central role played by best practice records management in helping us meet our data protection obligations. The Information Commissioner was represented at a forum session and was left in no doubt that this work contributed to Scottish public authorities being particularly well placed to achieve compliance.

### Element 15

However, the most significant change to the plan came from the forum recommendation to include an additional element. Element 15 covers “public records created by third parties” but does not add to the existing requirements of authorities under the act. It merely emphasises the importance of this responsibility. The act is very clear that we have a responsibility to properly provide for public records being created on our behalf by a third party. That’s why it was so important to have private and third sector voices at the forum. The obvious example, given the background to the act, is the contracting out of childcare by a local authority. Following previous records management failures in this area, highlighted by the Historical Abuse Systemic Review and current





The stakeholder forum discuss Element 15. Courtesy of Hugh Hagan, National Records of Scotland.

**“We encourage you to have a look at the plan for yourself”**

Scottish Child Abuse Inquiry, we welcomed the desire of the forum to add this new element. Our task now is to develop robust accompanying guidance which we hope to produce by the end of this year.

### Coproduction

The final arm of engagement came with the formal, online, Scottish government public consultation, where it was uniformly welcomed by stakeholder groups as well as the wider public who participated in the consultation.

The work of the stakeholder forums, the wider remote participation of public sector colleagues and members of the public, and the coproduction of our model plan has taken us to new ground. We hope to build on this through continued collaboration as this new model plan stands testament to the power and influence that joint working can deliver. We encourage you to have a look at the plan for yourself: <https://www.nrscotland.gov.uk/record-keeping/public-records-scotland-act-2011/resources>



Preserving the past | Recording the present | Informing the future

### Element 15: Public Records created by third parties

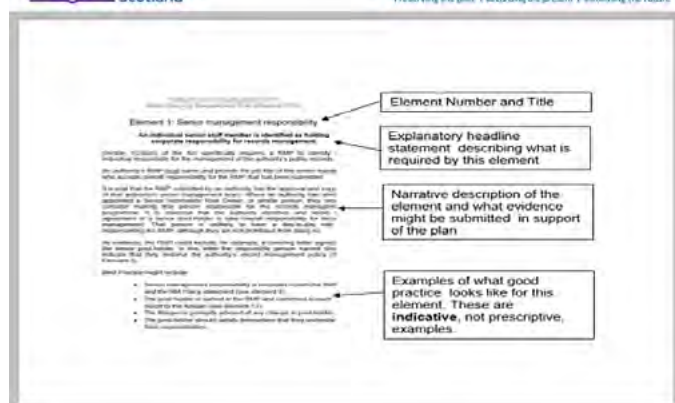
Records created by third parties when carrying out a function of an Authority must be covered by the agreed Records Management Plan of the Authority.

- ... arrangements for managing public records created and maintained by a third party provider through ... contractual clauses and monitoring procedures
- ... procurement documentation and contractual clauses will reference contract monitoring and “end-of-contract” procedures ...
- Arrangements will provide for proper retention and disposal of records throughout the duration of the contract
- The authority and the third party will have a clear understanding of the records that fall within the scope of the contract .....

Details of the new element 15. Courtesy of Hugh Hagan, National Records of Scotland.



Preserving the past | Recording the present | Informing the future



New layout of the model plan. Courtesy of Hugh Hagan, National Records of Scotland.



# From economic policies to records policies

**Carla McKirdy** reflects on how Titus Lyaruu developed its records management policy within the United Nations Economic Commission for Africa (UNECA) and changed decades-old ways of working.

**I**n 2011, the organisation famed for being at the frontline of economic policymaking in Africa did not yet have a standard records management policy of its own and was reliant on paper. Titus joined the UNECA at this time and saw that whilst attempts had been made to review the situation, nothing had been achieved.

Following several damning reports by external auditors concerning the manner in which important records were managed, the organisation created a position within the Knowledge Management Services Section (KMSS). Titus's mission was to speedily develop a uniform records management framework and bring UNECA into the present by transitioning from paper-based systems to digital.

UNECA's paper-based culture was evident: entire rooms throughout the organization had been dedicated to stashing away paper records. It was necessary to develop an inventory of what was already in stores and basements since the 1950s, and then engage in a massive clean-up of superfluous documents. One division alone produced more than 47 tonnes of paper that required shredding. Staff across the organisation were brought in to clear stores and now hundreds of square meters within UNECA have been freed up.

The environmental toll of paper records is clear and the new records management policy had to align with the

United Nations Sustainable Development Goals. However, decades of producing and filing paper records had become entrenched as part of the commission's culture. The push towards going digital had to be supported by an official policy that would persuade staff to get onboard with a new digital culture.

Titus knew that senior management buy-in was necessary for the document to become policy but "having chiefs take ownership of this policy was the first step... we needed to have this program owned by the entire commission". Unfortunately, staff at UNECA were initially mistrustful of the new systems and keen to cling on to their old processes. Small steps have been key to getting wider support. All parts of the organisation now have a records management lead who can help build a records management culture from within.

As a digital records management culture becomes part of UNECA, Titus is keen to ensure that sustainability underpins it and will continue to align recordkeeping with the United Nations sustainable development goals. He also highlights how the new digital system allows for ease of collaboration, encouraging knowledge sharing. These outcomes are sure to embed the policy amongst even the most stubborn of staff and effect positive change throughout.

**“**having chiefs take ownership of this policy was the first step... we need to have this program owned by the entire commission**”**



Image courtesy of Titus Lyaruu

# Digital culture change

**Jason King**, from the Crown Estate, gives us some tips and techniques for driving digital culture change forward.

Sir Frances Bacon was correct when he wrote 'knowledge is power'. This is definitely the case when attempting digital culture change within any organisation. Digital culture change can be defined as the change to an organisation's culture following the development and growing use of digital technologies. However, change can also be necessary within environments which have already gone digital.

In the place of approved recordkeeping areas, many still use restricted-access areas of shared drives, personal drives and mailboxes to store business information. To change this, and move to collaborative working, you need to start with knowledge. You must learn:

- what digital information you have;
- where it is;
- how big it is;
- how old it is;
- when it was last changed;
- what format it is kept in.

There are a whole array of products on the market which can help identify this information. Whatever you choose, the secret is to be able to provide simple reports in a format that users can identify with.

## Show them what you've got

Infographics are a powerful way to show people how much digital information you have. Whether you use something



Image courtesy of pixabay

**“Your knowledge and enthusiasm will help persuade others of the benefits of good digital recordkeeping”**

as simple as pie charts or bar charts, or something more elaborate, the messages will come across much stronger than just using numerical data. This is especially true in a world where using megabytes, gigabytes and even terabytes to quantify holdings is becoming redundant given the exponential growth of digital information in use.

I have shown the amount of data by expressing it as DVDs and the length of time it would take to watch them all. Another approach is printing off a page of text, calculating its digital volume, and working out how many sheets of paper's worth of data you have. This can then be given an equivalent to the height of The Shard (309.6 metres) or the distance around the Equator (40,075 km). These methods seem to strike a chord with users and make them realise just how much data the organisation has. This helps them consider where it is held and what is actually no longer of use.

## Practise what you preach

Knowledge of your data volumes is only one piece of your digital cultural change arsenal. To get people to manage their digital information more efficiently, I have learnt that you have to understand all the digital jargon and technology yourself. To talk the talk you need to walk the walk. Being digital is not something you do, it is something you are. Your knowledge and enthusiasm will help persuade others of the benefits of good digital recordkeeping. One way to increase your understanding of all things digital is to network and use all of the knowledge and information sharing tools at your disposal. Twitter, LinkedIn and YouTube are all powerful resources. However, there really is not any substitute for actually liaising with your professional colleagues in other organisations. Let's face it, there isn't an organisation that hasn't had a challenge when it came to changing the culture of digital recordkeeping, so there is plenty of experience out there to learn from.

Changing the digital culture within your organisation is not easy. The first step begins with you and your ability to influence others by demonstrating to them what digital information you have, where it is and why this might be a bad thing. If done well, you will soon gain champions who will join you in your quest to improve digital recordkeeping throughout your organisation. With such an army on your side, you can achieve anything.



# Navigating emerging geopolitical and commercial conflicts

**Kolya Abramsky**, a student in Archives and Records Management at University College London, examines the relevance of emerging geopolitical and commercial conflicts for our profession.

The last 20 years have seen an increase in the value of information, data and related services. This has both resulted in and been driven by, the emergence of global corporations – Microsoft, Google, Amazon, Facebook, Twitter, Huawei. These companies dominate the global informational landscape, using expensive and advanced technologies. Their complex, global networks use international work forces, monetary flows, and profits. To maintain this, infrastructure is fundamental: cloud storage, the worldwide web, artificial intelligence, satellite communication networks, regional information corridors and hubs, high-speed internet, cabling and phone lines, servers, computers, laptops, mobile and fixed telephones, and software companies.

In this context, major new commercial and geopolitical tensions and conflicts are emerging, including:

- Accusations of deliberate use of disinformation as a tool in inter-state relations;

“These conflicts are information governance’s problem.”

Image courtesy of pixabay

- Attempts to influence national elections through targeted information (and disinformation) flows, implicating national governments and private companies, most notably Cambridge Analytica;
- Sharpening tensions over market competition between major world powers and 'their' information companies. This includes the European Union's Competition Commission investigating and fining US companies Google, Facebook, Amazon and Apple;
- Inter-power rivalry to lead 5G technology development and market share, which entails the US conflict with Huawei;
- Emerging inter-power rivalry over military-use information infrastructure;
- Rising geopolitical tensions between the US and China over 'cyber-sovereignty' versus "global internet commons".

Information governance operates within this emerging world. The rise of electronic records, electronic records management, data banks, cloud-storage, automated retention schedules and outsourcing in the sector has ensured this. Consequently, these conflicts are information governance's problems as much as anyone else's. To avoid becoming pawns in these wider conflicts, we need to anticipate, understand, and prepare to navigate them.

### A global scale

There is a need to understand society on a global scale, as a systemic totality rather than on a country-by-country basis. This is necessary as this is the society in which information governance sits. It is a global system in which countries and regions do not exist independently, but relate to one another in different ways, involving both cooperation and conflict. It is a world of international economics, commerce, politics, as well as inequalities, hierarchies, tensions, conflicts and resistances. We must grapple with questions about how any given country (and hence its information governance practices and institutions) both shapes and is shaped by this global system.

### Plus ça change...

Geopolitical conflicts over the governance of information production, storage and dissemination are not new and can be found throughout history:

- the establishment of the Universal Postal Union and International Telecommunications Union in the late 19th century;
- the League of Nations' global efforts in the 1920s and 1930s at regulating information flows, press access and deliberate disinformation and propaganda between states;

**“ Studying past experiences may offer insights into today's problems ”**

- United Nations' early freedom of information conference, the UN's Convention on the International Right of Correction approved in 1952, the Non-Aligned Movement's calls for a New International Information Order/New World Information and Communication Order in the 1970s, and UNESCO's efforts to implement this in the late 1970s and early 1980s;
- the World Summit on Information Society in the early 2000s.

Studying past experiences may offer insights into today's problems, possible future trajectories and how best to act in the present. These were all highly contentious processes that took many years to resolve, as different states and corporations fought out their conflicting interests around information and communication. It appears that these earlier efforts were part of a historical process in which global information politics has risen and fallen in successive waves. Today's emerging conflicts suggest that a new upturn in the wave may be underway.

### The impact

Will Microsoft, Google and other US companies continue to serve information governance clients based in countries that also engage with Huawei? Or, might US geopolitical and commercial concerns about Huawei demand that these companies drop their clients? Are we ready for scenarios in which information governance's interests sharply diverge from those of the information service providers?

These questions may, indeed, be worth losing sleep over.





Crowne Plaza, Chester  
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