

Circular Memorandum

From : Director of Administration To : Distribution
Ref. : (41) in GRS T&C/60/13
Tel. No. : 2195 7781
Fax. No. : 2463 5200
Date : 11 July 2012

Establishment of Departmental Records Management Policies

This circular memorandum provides advice to help bureaux and departments (B/Ds) develop and establish their departmental records management policies by April 2013.

Importance of a Departmental Records Management Policy

2. The Government has reiterated its records management policy and promulgated a list of mandatory and essential records management requirements through General Circular (GC) Nos. 5/2006 entitled “Management of Government Records” and 2/2009 entitled “Mandatory Records Management Requirements”. Recognizing that records management is an important function of B/Ds, we have also issued a series of records management procedures and guidelines, including the Records Management Manual and a series of records management publications (accessible at <http://grs.host.ccgo.hksarg/index.htm#records>) to promote good practices for the management of government records in B/Ds.

3. To ensure compliance with the Government’s records management policy, which requires the establishment in each B/D of a comprehensive departmental records management programme for effective and efficient management of government records as well as for identification and preservation of archival records, it is incumbent on B/Ds to develop and establish departmental records management policies in their organizations taking their unique business and records management needs into account. A departmental records management policy demonstrates a B/D’s commitment to adopting and practising good records management, serves as guidelines on records management for its staff and is an effective way of cultivating and communicating records management culture within the organisation. Such a policy is also a key component of good corporate governance.

4. In the “Report on Review of Records Management Practices of B/Ds in 2010” issued in November 2011, we recommend that B/Ds should, among other things, draw up departmental instructions or guidelines on records management not later than April 2013. B/Ds’ establishment of their departmental records management policies by the same date is in line with this recommendation.

Components of a Departmental Records Management Policy

5. A departmental records management policy is a statement which offers an overview of how the B/D should create and manage its records to meet operational, policy, legal and financial purposes. The key components of a departmental records management policy should comprise –

- (a) Purpose;
- (b) Policy statement;
- (c) Scope;
- (d) Regulatory environment;
- (e) Roles and responsibilities for records management;
- (f) Recordkeeping system;
- (g) Protecting vital records;
- (h) Monitoring and auditing; and
- (i) Training.

6. To illustrate what a departmental records management policy might look like, an example is given at **Annex I** (MS Word copy accessible at <http://grs.host.ccgo.hksarg/doc/drmp.doc>). While the example serves both as a framework and a guide, B/Ds should tailor it to their unique business and records management needs. In the interests of promoting good records management, a set of additional guidelines in respect of the records management processes has also been developed for B/Ds’ reference and included as Appendix to Annex I.

7. When developing their departmental records management policies and additional records management guidelines for their staff, B/Ds should make reference to GC Nos. 5/2006 and 2/2009 as well as the Records Management Manual and other records management publications issued by the Government Records Service (GRS) for more information on the Government’s records management policy, mandatory records management requirements and records management good practices. A list of such reference materials is at **Annex II**.

Promulgation of Departmental Records Management Policies

8. B/Ds should promulgate their departmental records management policies to all staff, including staff responsible for records management and those who need to access and use records in their daily work. This is to clearly inform staff of its contents and implications and, most importantly, to make staff aware of their records management responsibilities as defined within the policy. If necessary, B/Ds should develop further guidelines and procedures for compliance by their staff.

9. B/Ds are requested to let GRS (Attn: Records Management and Administration Office, e-mail: rmaoinfo@grs.gov.hk) have a copy of their departmental records management policies upon their promulgation. The policy should be re-circulated to all staff at least once every six months.

Monitoring and Review

10. B/Ds should monitor their staff's compliance with the departmental records management policies. To cope with changing circumstances, B/Ds should review the policies at least once every two years.

Enquiries

11. Enquiries on this circular memorandum should be addressed to Chief Executive Officer (Records Management and Administration) at 2195 7818 or Senior Executive Officer (Records Management) at 2195 7789 of GRS.

(Hillman Chow)
for Director of Administration

Distribution

Permanent Secretaries
Heads of Department

c.c. Judiciary Administrator

Departmental Records Management Policies : An Example

Purpose

[This part defines the aims of the departmental records management policy which is essential to demonstrate the commitment of bureaux and departments (B/Ds) to complying with the mandatory records management requirements and adopting records management good practices.]

The purpose of this policy is to establish an overarching framework for the creation and management of records¹ through a comprehensive records management programme within the department to meet its business needs, accountability requirements and stakeholder expectations. The departmental records management policy and General Circulars relating to records management (including General Circular Nos. 5/2006 and 2/2009²) will be re-circulated to all staff at least once every six months.

Policy statement

[This part outlines the B/D's commitment to records management. It should define the main objectives of the departmental records management policy, including support to the Government's records management policy and any other important issues specific to records management within the organization.]

2. Records are valuable resources of the Government to support evidence-based decision making, meet operational and regulatory requirements and are essential for an open and accountable government. This department is committed to implementing the Government's records management policy through the establishment and implementation of a comprehensive records management programme for effective and efficient management of government records as well as identification and preservation of archival records.

¹ A **record** is any recorded information or data in any physical format or media created or received by an organization during its course of official business and kept as evidence of policies, decisions, procedures, functions, activities and transactions.

² These General Circulars are accessible at <http://ref.ccgo.hksarg/csogc/en/c200605e.pdf> and <http://ref.ccgo.hksarg/csogc/en/c200902e.pdf> respectively

3. The records management programme of this department aims to –

- (a) make and keep authentic, reliable, complete and usable records;**
- (b) enhance operational effectiveness and efficiency;**
- (c) minimize the costs of managing records;**
- (d) provide quality services to users;**
- (e) provide necessary security for government information;**
- (f) facilitate public access to records and information that encourage better understanding of government policies and operations; and**
- (g) facilitate identification of records that have permanent value so that they may be preserved and made available to the public for research, educational, cultural and other related purposes.**

Scope

[This part identifies and defines who and what the policy applies to.]

4. This policy applies to all staff of the department for managing records created/collected in the course of business activities irrespective of the formats of the records. It also applies to all recordkeeping systems, including paper-based systems or electronic information systems (such as an electronic recordkeeping system (ERKS) and a business system with adequate records management functionality) which are used to keep and manage records of the department.

Regulatory environment

[This part identifies the regulatory environment that affects B/Ds' records management. It may include general legislation and government policy/regulations that affect records creation/collection, classification, access, or disposal etc; as well as any legislation, industry codes/practices, or other policy/guidelines specifically applicable to individual B/Ds.]

5. The department acknowledges that the following laws and government policy/regulations have implications on the department's records management programme –

- (a) Evidence Ordinance (Cap.8) - e.g. proper keeping of records to ensure its legal admissibility;**
- (b) Personal Data (Privacy) Ordinance (Cap.486) - e.g. timely destruction of personal data in accordance with Privacy Commissioner Office's Code of Practice on Human Resource Management;**
- (c) Limitation Ordinance (Cap.347) - e.g. retention of relevant records for the specified limitation periods to serve as evidence in possible legal proceedings;**
- (d) Electronic Transactions Ordinance (Cap.553) - e.g. admissibility of electronic records in a court of law; and**
- (e) Code on Access to Information - e.g. proper organization of records to facilitate their efficient retrieval to timely respond to public access requests.**

6. The department's records management programme has been established in accordance with its obligations under the above regulatory environment.

Roles and responsibilities

[This part outlines the various records management roles and responsibilities within the B/D for compliance with the departmental records management policy and effective implementation of the departmental records management programme. B/Ds may refine the responsibilities of each role to meet their business needs in line with the relevant mandatory records management requirements set out in General Circular (GC) No. 2/2009 as well as the best practices set out in Recommendations 14-18 in the "Report on Review of Records Management Practices of B/Ds in 2010" and paragraphs 206-219 of the Records Management Manual, as appropriate. B/Ds should note that the roles and responsibilities will probably need to be realigned upon implementation of an ERKS. For example, a Record User is normally required to capture and classify an electronic record into an ERKS. In a paper-based recordkeeping system, such work is mainly performed by Registry Staff.]

7. Records management is the responsibility of every staff of the department. While the head of department has the overall responsibility for the records management of the department, the following staff are assigned with specific roles and responsibilities –

- (a) [*Post title of a directorate officer in the B/D*³] will oversee the records management in this department.**
- (b) [*Post title*] is appointed as the Departmental Records Manager (DRM)⁴ of this department and is responsible for assisting in establishing and implementing a comprehensive departmental records management programme.**
- (c) Assistant Departmental Records Managers (ADRM) (who should be generally not below the rank of Executive Officer II or equivalent (i.e. an officer whose rank's maximum pay point is not lower than Master Pay Scale (MPS) Point 27 or equivalent)) are appointed to assist the DRM to monitor records management activities in the department. A list of ADRMs is attached.**
- (d) Records Managers (who should be generally not below the rank of Executive Officer II or equivalent) are appointed to oversee records management matters in the registries of each section/office. A list of Records Managers is attached.**
- (e) Registry Staff are responsible for the day-to-day records management activities in their registries.**
- (f) Records Users (i.e. subject officers) are responsible for creation/collection of and defining the access control for records in their daily business.**

³ Designating a directorate officer to oversee records management is crucial to the success of records management in the B/D.

⁴ The DRM of each B/D has a key role to play in records management. A list of major duties of DRM is at Appendix I to GC No. 2/2009. According to the GC, an officer not below the rank of Senior Executive Officer or equivalent (i.e. an officer whose rank's maximum pay point is not lower than Master Pay Scale Point 44 or equivalent) should be designated as DRM, and any replacement of DRM should be reported to GRS as soon as this takes place, and in any case not later than two weeks after the replacement.

8. Individual staff may play more than one of the above roles. The records management duties of staff assigned with specific records management roles and responsibilities, particularly those relating to paragraph 7 (a) to (e) above, will be clearly reflected in their job descriptions to facilitate evaluation.

Recordkeeping system

[This part identifies official recordkeeping systems designated by the B/D. It should also prohibit staff to use personal or non-official systems to capture, manage and store records of the B/D.]

9. A recordkeeping system is a manual or an automated information system in which records of the department are collected, organized and categorized to facilitate their retrieval, distribution, use, disposal or preservation. All records of the department will be captured into official recordkeeping systems, e.g. authorized paper-based systems managed by confidential registries, general registries and personal secretaries, ERKS and business systems with adequate records management functionality, but not personal spaces/systems (e.g. personal folder, e-mail in-box).

10. The recordkeeping system will manage the following records management processes –

- (a) Creation/collection and capture of records;**
- (b) Registration of records;**
- (c) Records classification;**
- (d) Records storage and preservation;**
- (e) Access to records;**
- (f) Tracking movement of records; and**
- (g) Retention and disposal of records.**

Operational and procedural guidelines for these processes are outlined in the Appendix.

Protecting vital records

[This part outlines the arrangements of vital records protection. To facilitate better protection of vital records and minimize cost, B/Ds should consider establishing a centralized vital records protection programme.]

11. Vital records are records containing information essential to the continued and effective operation of an organization during and after an emergency or disaster. This department is committed to protecting its vital records through a vital records protection programme⁵. Completed vital records schedules⁶ prepared by sections and offices are centrally retained by DRM.

Monitoring and auditing

[This part outlines the arrangements for monitoring and auditing the compliance with the Government and departmental records management policies, procedures and guidelines.]

12. The department will keep this policy under regular review. Sections and offices are responsible for monitoring, on a day-to-day basis, compliance with the departmental records management policy, procedures and guidelines as well as mandatory records management requirements set out in General Circular(s). Sections and offices are required to fully cooperate with the DRM and the Government Records Service (GRS) to conduct records management studies/reviews in the department.

Training

[This part outlines the arrangements for records management training. B/Ds may consider whether records management training should be included as part of their induction and career development training for departmental staff.]

⁵ Detailed guidelines and procedures for establishing, maintaining and reviewing a vital records protection programme are given in GRS Records Management Publication No.6 “Manual on Vital Records Protection” (accessible at <http://grs.host.ccg.hksarg/pub6.htm>).

⁶ See Appendix D to GRS Records Management Publication No.6 “Manual on Vital Records Protection”.

13. The department will equip staff with adequate records management knowledge and skills, in particular staff who are responsible for records management or have to create and collect records during their work. In this regard, sections and offices will nominate their relevant staff to attend records management training courses and seminars organized by GRS⁷ or the DRM.

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⁷ Information on GRS' training courses is available at <http://grs.host.cngo.hksarg/index.htm#records>.

**Operational and Procedural Guidelines for
Records Management Processes**

[This Appendix outlines and consolidates the essential arrangements of records management processes which form part of a B/D's records management programme to meet the mandatory records management requirements and adopt the records management good practices.]

[Note for reference:

- *For effective implementation of each process, B/Ds should consider developing further guidelines and procedures according to their business and records management needs with reference to the relevant procedures and guidelines issued by GRS at Annex II.*
- *B/Ds should also establish arrangements to centrally coordinate certain records management activities, e.g. regular review of records classification schemes, records storage and disposal schedules as well as regular disposal of time-expired records to ensure consistency across the department.]*

All sections and offices in the department should ensure that the following records management processes are properly established and managed to support a comprehensive departmental records management programme.

Creation/collection and capture of records

[B/Ds should consider documenting decisions as to what records are to be kept in a way that can be used by staff in their daily work. Such decisions can serve as evidence of the department's intentions.]

2. Complete and reliable records should be created/collected to meet operational, policy, legal and financial purposes and document accurately and adequately government functions, policies, procedures, decisions and transactions to serve as reliable evidence. Some general examples of what records should be created or collected are provided below –

- (a) inward and outward communication with external persons and bodies directly relating to the functions and activities of an organization;

- (b) minutes and other records of meetings, consultations and deliberations pertinent to the decision-making process, formulation of policies and procedures or transaction of business;
 - (c) major oral decisions and commitments;
 - (d) individual exercise of a discretionary judgement which has a major effect on the functions and activities of the organization;
 - (e) departmental/government forms, registers and information (in electronic/non-electronic forms) which document business transactions/procedures; and
 - (f) draft documents (e.g. amendments to minutes of meetings) for a complete documentation of the relevant issue, as appropriate.
3. The creation/collection of records should be adequate but not excessive.
4. Records should be created/collected to document the actions and decisions as soon as possible in order to ensure that the reliability and completeness of records will not be adversely affected due to passage of time.
5. E-mail records should be printed and filed in a paper-based recordkeeping system in accordance with the “Guideline on the Management of Electronic Mail” (accessible at <http://grs.host.ccgo.hksarg/doc/emailguideline.pdf>) issued by the Government Records Service (GRS) pending implementation of an electronic recordkeeping system (ERKS) in the department.
6. Records created/collected should be captured into official recordkeeping systems.
7. Decisions as to what records are to be kept should be documented in a way that can be used by staff in their daily work. Such decisions can serve as evidence of the department’s intentions.

Registration of records

[This section outlines the arrangements for proper registration of records captured into the recordkeeping system in order to provide evidence that the records have been created or collected.]

8. A record is registered when it is captured into the recordkeeping system, providing evidence that it has been created/collected. In a paper-based system, a record captured into a file should be registered through entering such contextual information as the type of record (e.g. memo), date of record, and name of originator/addressee(s) of the record on the file in accordance with Chapter 12 of GRS Records Management Publication No.2 “Managing Active Records: File Management” (accessible at <http://grs.host.ccg.hksarg/pub2.htm>).

Records classification

[This section outlines the arrangements for records classification. B/Ds should consider whether “centralized” records classification schemes covering sections and offices should be established.]

Establishment of records classification schemes

9. To facilitate a wide range of records management activities, including identification, capturing and retrieval of records, security and access control, records should be systematically organized according to a records classification scheme (also called a file plan), which is a plan for logical arrangement of both administrative records⁸ and programme records⁹ according to one or more of the following: business functions, activities and contents of the records.

10. The standard subject classification scheme for administrative records as set out in GRS Records Management Publication No.3 “Subject Filing” (accessible at <http://grs.host.ccg.hksarg/pub3.htm>) will continue to be adopted for the classification of administrative records in the department.

⁸ Administrative records are records created or received during the course of day-to-day administrative activities that deal with finance, accommodation, procurement and supply, establishment, personnel and other general administrative activities. Records of this nature are common to B/Ds.

⁹ Programme records are records created or received by a B/D whilst carrying out the primary functions, activities or mission for which the B/D was established. Records of this nature are unique to each B/D.

11. All programme records should also be covered by classification schemes. For those programme records not yet covered, relevant sections and offices should develop classification schemes for them not later than April 2013 in accordance with the procedures set out in the “Subject Filing” and Chapters 3-5 of “Managing Active Records: File Management”.

12. All sections and offices should ensure that proper filing practices are implemented in their registries with reference to the procedures set out in Chapters 8-16 of the “Managing Active Records: File Management”.

13. A Records Manager or Registry in-charge should be designated to control the creation, naming and coding of new files to facilitate accurate capturing and ready retrieval of records.

14. As a requirement to ensure quality, new records classification schemes of the department such as those necessitated by re-organisation should be approved by the Departmental Records Manager (DRM). The DRM’s approval is also required for records classification schemes to be adopted for a new office, irrespective of whether this is by way of creating new schemes or extending existing schemes. Before giving approval, the DRM should have regard to the principles set out in Appendix II to General Circular (GC) No. 2/2009.

Review of records classification schemes

15. To ensure that each records classification scheme remains effective to cope with changes over time and to identify scope for improvement, sections and offices are required to review the records classification schemes for both administrative and programme records every two to three years and seek the DRM’s endorsement, having regard to the principles set out in Appendix II to GC No. 2/2009. Staff not below the rank of Senior Executive Officer or equivalent (i.e. an officer whose rank’s maximum pay point is not lower than Master Pay Scale (MPS) Point 44 or equivalent) may be designated to assist the DRM in the review, but the DRM will remain responsible for the overall co-ordination and effectiveness of the review.

16. Each review should be completed within a reasonable period (say three to six months) and a clear target completion date should be set for each review. The results of the review and any follow-up action taken should be

documented. The first round of review should be completed not later than April 2013.

Records storage and preservation

[This section outlines the arrangements of proper records storage and preservation as well as other related issues.]

Proper storage of records

17. Records should be stored in such a manner so as to facilitate user access and ensure that they are protected from unauthorized access, use, disclosure, removal, deterioration, loss or destruction. The Security Regulations (accessible at <http://sb.host.ccg.hksarg/sr/sr.pdf>) should be complied with for handling and storing classified records and information. To ensure security of electronic records and information stored in computer systems (e.g. an ERKS or a business system), the Office of the Government Chief Information Officer's information technology security policy and guidelines should be followed.

18. For proper preservation, paper records should not be stored in an environment with high temperature and humidity, or exposed to significant risk of water damage (e.g. near unblocked window, under/near water/sewage pipe, water drain, manhole, water permeable wall or ceiling, water tank). Records should also be stored in proper facilities (e.g. filing cabinets and filing racks) instead of stacking them on the floor.

19. Paper records having long-term (i.e. 30 years or over) value should be stored in a clean environment with round-the-clock control of temperature and relative humidity at 20°C +/- 2°C and RH 50 % +/- 5% respectively to ensure their preservation to meet operational needs and reduce the risk of mould growth which is a health hazard as far as practicable. Alternatively, sections and offices should critically review and shorten the retention periods of such records or preserve them through microfilming by utilising the service of GRS' Government Microfilm Centre.

20. For preservation of records stored in other media (e.g. optical discs), professional advice should be obtained as appropriate.

Review of records storage

21. Reviews on records storage should be conducted regularly (say once every two to three years) and after events such as typhoon or rainstorm. Each review should be completed within a reasonable period (say two to three months) and a clear target completion date should be set for each review. The results of the review and any follow-up action taken should be documented. The first review should be completed not later than April 2013.

Access to records

[This section outlines the arrangements of access to records kept by B/Ds. B/Ds should provide here cross reference to the departmental guidelines on access to records or information containing personal data and access to their records or information by the public.]

22. Timely access to records should be provided to authorized users for conducting business and other authorized purposes.

23. To provide sensitive information with adequate protection, records should be classified according to their level of sensitivity at a particular time. Classified records should be managed in accordance with the Security Regulations.

24. Access to records containing personal data should be arranged according to the Personal Data (Privacy) Ordinance.

25. Requests for access to records of the department by the public should be arranged according to the Code on Access to Information.

Tracking movement of records

[This section outlines the arrangements of tracking movement of records and procedures of handling loss or unauthorized destruction of records.]

Accurate and updated inventory of records

26. An accurate and updated inventory of records including at least (i) file title; (ii) file reference number; (iii) date opened and date closed; and (iv) storage location (e.g. room/floor) should be maintained.

27. Movements of records should be registered by the Bar-Coding File Management System (BCFMS), file movement card (GF448) or other effective means. Files should be passed through general registries or responsible staff so that their movement can be properly kept track.

[Note for reference: B/Ds should consider implementing the Bar-coding File Management System (BCFMS) to track movement of records. For more information on BCFMS, please contact the Efficiency Unit (tel no. 2520 0423 or 2520 0431).]

28. Records management staff should take stocks of records and check the completeness of files regularly to minimize missing of records.

Transit and bulk relocation of records

29. To ensure safe custody of records during transit, effective measures (e.g. registering the records, putting records in locked/properly sealed containers, checking records before and after transit etc.) should be adopted. For bulk relocation of records, the following arrangements should be put in place: (i) designating an officer not below the rank of Executive Officer II or equivalent (i.e. an officer whose rank's maximum pay point is not lower than MPS Point 27 or equivalent) to oversee the task; (ii) taking stock before the relocation exercise; (iii) conducting a file inventory check after relocation; (iv) documenting the inventory check; and (v) updating the new storage location immediately afterwards.

Loss or unauthorized destruction of records

30. Any loss or unauthorized destruction of records should be immediately reported to the DRM and a copy of such report sent to GRS simultaneously. Upon receipt of such report, the DRM, with the assistance of the section or office concerned should (i) ascertain the facts and identify the circumstances leading to the loss or unauthorized destruction; (ii) reconstruct the records where necessary; (iii) take steps to prevent recurrence; (iv) consider whether any disciplinary action or other administrative action is necessary; and (v) report his findings and actions on (i) to (iv) above to GRS within three months.

31. The reporting requirements in other codes and regulations (e.g. Security Regulations) should be followed for loss of records containing classified information or personal data.

Retention and disposal of records

[This section outlines the arrangements of drawing up records disposal schedules, regular disposal of records, review of disposal schedules and related issues.]

[Note for reference: B/Ds should establish their departmental records disposal programmes in accordance with Recommendation 9 in the “Report on Review of Records Management Practices of B/Ds in 2010”, and may include in such programmes the following arrangements as appropriate.]

Establishment of records disposal schedules

32. All records irrespective of formats should be covered by approved disposal schedules, which specify the arrangements to be made for custody (e.g. the department, GRS’ records centres), retention period (e.g. three years) and disposal action (e.g. destruction or transfer to the Public Records Office (PRO) of GRS for permanent retention as archival records) of the records concerned to facilitate systematic disposal of records.

33. To dispose of administrative records, the set of disposal schedules developed by GRS and detailed in GRS Records Management Publication No. 4 “General Administrative Records Disposal Schedules (GARDS)” (accessible at <http://grs.host.ccgo.hksarg/pub4.htm>) should be adopted.

34. Programme records should be disposed of according to the disposal schedules established by the department and approved by GRS. To ensure that records are not retained for unduly long period without genuine business needs, sections and offices should critically assess their business requirements when setting a records retention period of seven years or more in disposal schedules. A copy of approved disposal schedules should be forwarded to the DRM.

35. For new series of programme records created after April 2012 and not yet covered by draft or approved disposal schedules, draft disposal schedules should be established in accordance with the procedures set out in GRS Records Management Publication No.1 “A Practical Guide to Records Scheduling and Disposal” (accessible at http://grs.host.ccgo.hksarg/sch_disp.htm) and forward to GRS within a period of two years upon creation of the series. Draft and finalized disposal schedules should be endorsed and signed respectively by an officer not below

the rank of Senior Executive Officer or equivalent.

Regular disposal of time-expired records

36. Regular disposal of records facilitates easy retrieval of records in active use, and minimize costs for maintaining and storing records. Accordingly, time-expired records should be reviewed for disposal at least once every two years in accordance with GARDS for administrative records and approved disposal schedules for programme records. The results of the review on retention and disposal of time-expired records should be considered and endorsed in writing by an officer not below the rank of Senior Executive Officer or equivalent and properly documented. Each review should be completed within a reasonable period (say one to two months) and a clear target completion date should be set for each review. The first review should be completed not later than April 2013.

37. Records having archival value should be transferred to PRO of GRS according to the respective disposal schedules. If there are valid reasons to defer the transfer of time-expired records having archival value or potential archival value to PRO for retention or appraisal by more than two years, a directorate officer's written approval should be obtained. Such cases have to be brought up to the directorate officer for direction during the next disposal exercise.

38. In disposal exercises, particular attention should be paid to those files which have been opened over 30 years but remain unclosed to see whether they should be closed and then disposed of.

39. GRS Director's prior agreement must be obtained for any disposal or destruction of records using the memo templates provided by GRS (accessible at http://grs.host.ccg.hksarg/sch_disp.htm).

40. To minimize unauthorized destruction of records, records ready for disposal should be handled in accordance with the records disposal procedures set out in Appendix IV to GC No. 2/2009.

41. All records relevant to records disposal, including internal endorsement, GRS Director's agreement and a list of records approved for disposal should be kept permanently in the department for future reference.

Transfer of records to non-government bodies

42. In case records have to be transferred to non-government bodies, the sections and offices concerned should send a list of records pending transfer to the DRM for seeking GRS Director's prior agreement so that appropriate arrangements can be made for records having archival value. No government records should be transferred outside the Government unless with the prior agreement of the GRS Director.

43. The list of records should group the records by disposal schedule and include the following information: (i) file title; (ii) file reference number; and (iii) date opened and date closed.

Review of disposal schedules

44. To cope with changing circumstances, approved disposal schedules should be reviewed at least once every five years with reference to the checklist issued by GRS (accessible at http://grs.host.ccgo.hksarg/doc/Checklist_v1R.pdf). The review and any amendments should be endorsed by an officer not below the rank of Senior Executive Officer or equivalent. Proposed amendments to disposal schedules should be forwarded to GRS for approval.

45. Each review should be completed within a reasonable period (say two to three months) and a clear target completion date should be set for each review. The results of the review and any follow-up action taken should be documented. The first review should be completed not later than April 2013.

Documenting records management processes

[This section outlines the arrangements of documenting records management policy and processes as well as recordkeeping systems for future reference and auditing.]

46. Documentation describing records management policy and processes as well as recordkeeping systems should address legal, regulatory, operational and technical requirements. The following records management activities should be documented among others –

- (a) establishment and review of records management policy, procedures and guidelines;

- (b) designation of records management roles and responsibilities;
- (c) decisions on records creation/collection;
- (d) records inventory;
- (e) establishment, adoption and review of classification schemes;
- (f) review of records storage;
- (g) arrangements of records access;
- (h) movement of records;
- (i) establishment and review of disposal schedules;
- (j) internal endorsement on and GRS' approval for disposal of records;
- (k) deferment of transfer of records having archival value or potential archival value to PRO of GRS;
- (l) records disposal procedures;
- (m) bulk relocation of records procedures;
- (n) transfer of records to other sections and offices of the department, other departments or outside the Government;
- (o) investigation and follow-up action on loss or unauthorized destruction of records;
- (p) vital records protection programme; and
- (q) monitoring and auditing of records management.

47. Sections and offices are required to document other records management activities not listed above as appropriate.

Managing records for administrative changes

[This section outlines the arrangements to ensure that records are properly managed during administrative changes.]

48. From time to time, there are such administrative changes as reorganization of business functions and activities which necessitate transfer of records between sections and offices of the department, or to/from other departments. Such transfers should be properly managed in accordance with

the procedures set out in Chapter 8 of Records Management Manual (accessible at http://grs.host.ccgo.hksarg/doc/RM_Manual.pdf), including preparing an accurate list of records to be transferred, updating of records inventory/classification scheme(s)/disposal schedules, adopting the procedures on bulk relocation of records etc. To ensure effective coordination, the DRM should be informed of transfer of records between departments.

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**Reference Materials for
Establishing a Departmental Records Management Policy**

Government Records Management Policy

- General Circular (GC) No. 5/2006 entitled “Management of Government Records” dated 28 December 2006
[<http://ref.ccgo.hksarg/csogc/en/c200605e.pdf>]
- GC No. 2/2009 entitled “Mandatory Records Management Requirements” dated 22 April 2009 [<http://ref.ccgo.hksarg/csogc/en/c200902e.pdf>]
- Paragraphs 200-205 of Records Management Manual (RMM)
[http://grs.host.ccgo.hksarg/doc/RM_Manual.pdf]

Mandatory Records Management Requirements

- GC No. 2/2009 entitled “Mandatory Records Management Requirements” dated 22 April 2009 [<http://ref.ccgo.hksarg/csogc/en/c200902e.pdf>]
- Seminar on Mandatory Records Management Requirements for Departmental Records Managers held on 22 May 2009
[http://grs.host.ccgo.hksarg/doc/DRM_Seminar20090522.pdf]

General Records Management Good Practices

- GC No. 5/2006 entitled “Management of Government Records” dated 28 December 2006 [<http://ref.ccgo.hksarg/csogc/en/c200605e.pdf>]
- RMM

Regulatory Environment

- Paragraph 122 of RMM

Roles and responsibilities

- Paragraphs 2 and 5 of, and Appendix I to GC No. 2/2009
- Paragraph 206-219 of RMM
- Recommendations 14-18 of the “Report on Review of Records Management Practices of B/Ds in 2010” (Review Report 2010)

Recordkeeping system

- Paragraphs 400-403 of RMM

Creation/Collection and Capture of Records

- Paragraph 7 of GC No. 2/2009
- Guideline on the Management of Electronic Mail (including procedures on printing and filing electronic mail records)
[<http://grs.host.ccgo.hksarg/doc/emailguideline.pdf>]
- Guidelines on Creation and Collection of Records
[<http://grs.host.ccgo.hksarg/gccr.htm>]
- Frequently Asked Questions on Management of Electronic Mail
[[http://grs.host.ccgo.hksarg/doc/FAQ_email_\(updated_April_2011\).pdf](http://grs.host.ccgo.hksarg/doc/FAQ_email_(updated_April_2011).pdf)]
- Recommendation 3 of the Review Report 2010

Registration

- Chapter 12 of Government Records Service (GRS) Records Management Publication No. 2: Managing Active Records (P2)
[<http://grs.host.ccgo.hksarg/pub2.htm>]

Records Classification

- Paragraphs 8-12 of GC No. 2/2009
- Paragraphs 414-449 of RMM
- Chapters 3-5 of P2
- GRS Records Management Publication No. 3: Subject Filing (P3)
[<http://grs.host.ccgo.hksarg/pub3.htm>]
- Guidelines on the Implementation of the Standard Classification Scheme for Administrative Records [<http://grs.host.ccgo.hksarg/recclassification.htm>]
- Briefing on Implementation of the Standard Classification Scheme for Administrative Records held on 1 June 2009
[http://grs.host.ccgo.hksarg/doc/Implement_Standard_Scheme.pdf]
- Recommendations 4-6 and 17 of the Review Report 2010

Filing Practices and Registry Management

- Chapters 6 and 8-16 of P2

Records Storage and Preservation

- Paragraphs 21 and 23 of GC No. 2/2009
- Paragraphs 500-523 of RMM
- Recommendations 10 & 23 of the Review Report 2010

Tracking Movement of Records

- Paragraphs 6 and 21-23 of GC No. 2/2009
- Paragraphs 480-482 of RMM
- Recommendations 2, 11 and 19 of the Review Report 2010

Retention and Disposal of Records

- Paragraphs 12-20 of GC No. 2/2009
- Paragraphs 600-639 of RMM
- Recommendations 7-9 and 21-22 of the Review Report 2010
- GRS Records Management Publication No. 1: A Practical Guide to Records Scheduling and Disposal (P1) [<http://grs.host.ccgo.hksarg/pub1.htm>]
- Records Inventory Form (RMO1) for establishing a draft disposal schedule for programme records, RMO1 Explanatory Notes and RMO1 sample [http://grs.host.ccgo.hksarg/sch_disp.htm]
- Briefing on Establishment of Draft Disposal Schedules for Programme Records held on 22 June 2009 [http://grs.host.ccgo.hksarg/doc/Establish_Draft_Disposal_Schedule.pdf]
- GRS Records Management Publication No. 4: General Administrative Records Disposal Schedules (GARDS) [<http://grs.host.ccgo.hksarg/pub4.htm>]
- Guidelines on Using the General Administrative Records Disposal Schedules to Dispose of Administrative Records [http://grs.host.ccgo.hksarg/guide_admin_sch_disp.htm]
- Memo templates for seeking Government Records Service Director's approval for disposal of records [http://grs.host.ccgo.hksarg/sch_disp.htm]
- Checklist for reviewing approved disposal schedules [http://grs.host.ccgo.hksarg/doc/Checklist_v1R.pdf]

Use of Inactive Records Intermediate Storage Service provided by GRS Records Centre

- Chapters 5 and 6 of P1
- Notes on Transfer of Records to the Records Centre
[http://grs.host.ccgo.hksarg/doc/Notes_on_Records_Transfer_c.pdf]
- Records Transfer Request Form (RC1) [<http://grs.host.ccgo.hksarg/doc/rc1.pdf>]
and Records Transfer List (RMO5) [<http://grs.host.ccgo.hksarg/doc/rmo5.pdf>]
- Procurement of carton boxes for records to be transferred to the Records Centre
[<http://grs.host.ccgo.hksarg/cb.htm>]
- Requisition Form on records stored in the Records Centre (RC3)
[<http://grs.host.ccgo.hksarg/RC3.pdf>]

Protecting Vital Records

- Paragraph 24 of GC No. 2/2009
- Paragraphs 700-730 of RMM
- GRS Records Management Publication No. 6: Manual on Vital Records Protection (P6) [<http://grs.host.ccgo.hksarg/pub6.htm>]
- Vital records protection programme action plan
[http://grs.host.ccgo.hksarg/doc/Memo_vital_rec.pdf]
- Recommendation 12 of the Review Report 2010

Documenting records management processes

- Paragraphs 5, 8, 12, 15, 17-20, 22-26 of GC No. 2/2009

Managing Records for Administrative Changes

- Paragraphs 800-838 of RMM
- Recommendation 20 of the Review Report 2010

Monitoring and Auditing

- Paragraphs 25-26 of GC No. 2/2009
- Paragraphs 800-838 of RMM
- GRS Records Management Publication No. 7: Checklist for Proper Records Management Practices (P7) [<http://grs.host.ccgo.hksarg/pub7.htm>]

Managing Records in Chinese

- GRS Records Management Publication No. 8: 中文檔案管理指引 (P8)
[<http://grs.host.ccgo.hksarg/pub8.htm>]

Electronic Records Management

- Briefing on Electronic Information Management (EIM): "Records Management Requirements under the Government Electronic Information Management Strategy" for Departmental Records Managers and Heads/Information Technology Management Unit held on 15 June 2011
[http://grs.host.ccgo.hksarg/doc/ERM_for_DRM_and_ITMU.pdf]
- Frequently Asked Questions about Electronic Records Management and Electronic Recordkeeping System
[[http://grs.host.ccgo.hksarg/doc/FAQ_ERM_ERKS_\(May_2012\).pdf](http://grs.host.ccgo.hksarg/doc/FAQ_ERM_ERKS_(May_2012).pdf)]
- Functional Requirements of an Electronic Recordkeeping System
[http://grs.host.ccgo.hksarg/erks_fr.htm]
- Disposal of Original Records (for records that have been digitised and stored in a digital form) [http://grs.host.ccgo.hksarg/sch_disp.htm#DOR]

More and updated information on records management is accessible at the Government Records Service's website [<http://grs.host.ccgo.hksarg/index.htm#records>] at the Central Cyber Government Office
