

## **Departmental Records Management Policy : 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 the records management practices which the Government Records Service (GRS) advocates.]*

**The purpose of this policy is to establish an overarching framework for the management of records<sup>1</sup> through a comprehensive records management programme within the bureau / department to meet its business needs, accountability requirements and stakeholder expectations. While General Circular (GC) No. 3/2024 “Management of Government Records”<sup>2</sup> should be re-circulated to all relevant staff (i.e. staff responsible for and /or involved in records management) at least once every six months, the departmental records management policy should be re-circulated to ALL staff also at six-month interval.**

### **Objectives**

*[This part outlines the B/D’s commitment to proper 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 organisation.]*

**2. Records, irrespective of the physical format or media, 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 bureau / 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.**

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

<sup>2</sup> GC No. 3/2024 “Management of Government Records” is accessible at the records management theme page on Central Cyber Government Office (CCGO) at [https://grs.host.ccggo.hksarg/cgp\\_general.html](https://grs.host.ccggo.hksarg/cgp_general.html) or on the GRS’ website at [https://www.grs.gov.hk/en/hksar\\_government\\_administrative\\_guidelines\\_on\\_record\\_management.html](https://www.grs.gov.hk/en/hksar_government_administrative_guidelines_on_record_management.html).

- 3. The records management programme of this bureau / department aims to –**
- (a) create and keep authentic, reliable, complete and usable records;**
  - (b) enhance operational effectiveness and efficiency;**
  - (c) minimise 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 archival value so that they can be preserved as archives 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 bureau / department for managing records created / collected in the course of business activities irrespective of the formats or media 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 bureau / department.**

### **Regulatory environment**

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

- 5. The bureau / department acknowledges that the following laws and government policies / regulations have implications on the departmental 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 organisation of records to facilitate their efficient retrieval to provide timely response to public access requests.**

**6. The departmental 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 Annex A to GC No. 3/2024 "Management of Government Records" 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 Records User is normally required to capture and classify electronic records into the ERKS. In a paper-based recordkeeping system, such work is mainly performed by staff providing records management support.]*

**7. Records management is the responsibility of every staff of the bureau / department. While the head of bureau / department has the overall responsibility for the records management of the bureau / department, the following staff are assigned**

with specific roles and responsibilities –

- (a) *[Post title of a directorate officer in the B/D<sup>3</sup>]* will oversee the records management in this bureau / department.
- (b) *[Post title]* is appointed as the Departmental Records Manager (DRM) of this bureau / department and is responsible for assisting in establishing and implementing a comprehensive departmental records management programme.
- (c) Assistant Departmental Records Managers (ADRM)s (who should be generally not below the rank of Executive Officer (EO) 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 in monitoring records management activities in the bureau / department. A list of ADRMs is attached.
- (d) Records Managers (who should be generally not below the rank of EO II or equivalent) are appointed to oversee records management matters in each registry / section / office. A list of Records Managers is attached.
- (e) Staff providing records management support are responsible for the day-to-day records management activities in their registries / sections / offices.
- (f) Records Users (i.e. subject officers) are responsible for creation / collection of and defining the access control for records in their daily business.

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 from using personal or non-official systems to capture, manage and store*

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<sup>3</sup> In case the DRM is not a directorate officer, the bureau / department should appoint a directorate officer as the overseeing officer to make sure that records management would receive due attention from the senior management.

*records of the B/D.]*

**9. A recordkeeping system is a manual or an automated information system in which records of the bureau / department are collected, organised and categorised to facilitate their retrieval, distribution, use, disposal or preservation. All records of the bureau / department will be captured into official recordkeeping systems, e.g. designated paper-based recordkeeping 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 systems 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 Appendix I. Important points to note for general records users (i.e. the records users defined in paragraph 7(f) above or those who by functions of their posts are not required to undertake records management duties) are set out in Appendix II.**

### **Protecting vital records**

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

**11. Vital records are those records containing information essential to the continued and effective operation of an organisation during and after an emergency or disaster. This bureau / department is committed to protecting its vital records through establishing and implementing a vital records protection programme<sup>4</sup>. Completed vital records schedules<sup>5</sup> prepared by sections and offices are centrally retained by the DRM. The vital records protection programme is subject to review<sup>6</sup> at least once every two years, which should be documented for record purposes.**

### **Monitoring and auditing**

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

**12. The bureau / department will keep this policy and supplementary departmental guidelines under review<sup>7</sup> at least once every two years, which should be documented for record purposes. 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 GC No. 3/2024 "Management of Government Records"<sup>8</sup>. Sections and offices are required to fully cooperate with the DRM and GRS to conduct records management studies / reviews in the bureau / 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*

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<sup>4</sup> Detailed guidelines and procedures for establishing, maintaining and reviewing a vital records protection programme are stipulated in GRS' Records Management Publication No. 6 "Manual on Vital Records Protection", which is accessible at [https://grs.host.ccg.hksarg/cgp\\_publications.html](https://grs.host.ccg.hksarg/cgp_publications.html) or [https://www.grs.gov.hk/en/hksar\\_government\\_administrative\\_guidelines\\_on\\_record\\_management.html](https://www.grs.gov.hk/en/hksar_government_administrative_guidelines_on_record_management.html).

<sup>5</sup> Please refer to Appendix D to GRS' Records Management Publication No. 6 "Manual on Vital Records Protection".

<sup>6</sup> The review of the vital records protection programme should be conducted in accordance with Checklist F of GRS' Records Management Publication No. 7 "Topical Guide cum Checklists for Proper Records Management Practices". Publication No. 7 is accessible at [https://grs.host.ccg.hksarg/cgp\\_publications.html](https://grs.host.ccg.hksarg/cgp_publications.html) or [https://www.grs.gov.hk/en/hksar\\_government\\_administrative\\_guidelines\\_on\\_record\\_management.html](https://www.grs.gov.hk/en/hksar_government_administrative_guidelines_on_record_management.html).

<sup>7</sup> The review of the departmental records management policy should be conducted in accordance with Checklist A of GRS' Records Management Publication No. 7 "Topical Guide cum Checklists for Proper Records Management Practices".

<sup>8</sup> A list of the 24 mandatory records management requirements is at Annex A and the schedules for conducting and reviewing records management functions are summarised at Annex B to GC No. 3/2024 "Management of Government Records" for ready reference.

*career development training for departmental staff.]*

**13. The bureau / 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 organised by GRS<sup>9</sup> or the DRM.**

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**Government Records Services**

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**(with minor updates in November 2024)**

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<sup>9</sup> Information on GRS' training courses is available at [https://grs.host.ccgo.hksarg/service\\_training.html](https://grs.host.ccgo.hksarg/service_training.html).

### **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 practices which the Government Records Service (GRS) advocates.]*

*[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 publications and guidelines issued by GRS at **Annex** and set up their own mechanism (such as through regular / surprise checks) to monitor their staff's compliance with the departmental records management policy.*
- *B/Ds should also establish arrangements to centrally co-ordinate certain records management activities, e.g. regular review of business rules, records classification schemes, records storage, disposal schedules and other practices as well as regular disposal of time-expired records to ensure consistency across the B/Ds.]*

All sections and offices in the bureau / department should ensure that the mandatory records management requirements<sup>1</sup> are complied with and the records management processes are properly established and managed to support a comprehensive departmental records management programme. Sections and offices should review the records management practices at least once every two years or as specified in the ensuing paragraphs. All reviews should be documented for record purposes. To facilitate the reviews of records management and identification of major problems for improvement, the Government Records Service (GRS) has promulgated the Records Management Publication No. 7 “Topical Guide cum Checklists for Proper Records Management Practices”<sup>2</sup>.

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<sup>1</sup> For the sake of clarity, in line with the definition of “a record”, the prevailing records management principles and mandatory records management requirements are applicable to the management of paper records, electronic records (for example: electronic message records, as well as records in business systems and Government websites, etc.) and records in other physical format or media (such as microfilms, tapes, etc.) created, received or managed by the bureau / department.

<sup>2</sup> GRS' Records Management Publication No. 7 “Topical Guide cum Checklists for Proper Records Management Practices” is accessible at the records management theme page on Central Cyber Government Office (CCGO) at [https://grs.host.ccgohksarg/cgp\\_publications.html](https://grs.host.ccgohksarg/cgp_publications.html) or on GRS' website at [https://www.grs.gov.hk/en/hksar\\_government\\_administrative\\_guidelines\\_on\\_record\\_management.html](https://www.grs.gov.hk/en/hksar_government_administrative_guidelines_on_record_management.html).



## **Creation / collection and capture of records**

*[B/Ds should develop business rules to document 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 B/D'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 / collected are provided below –

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

The creation / collection of records should be adequate but not excessive. Records created / collected should be captured into official departmental recordkeeping systems.

3. 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. Under normal circumstances, records should be captured in a departmental recordkeeping system (e.g. paper-based recordkeeping system or electronic recordkeeping system (ERKS)) within 30 days upon creation / receipt and under exceptional circumstances, records could be captured within three months.

4. Electronic message records<sup>3</sup> should be captured directly to an ERKS once implemented. Unless agreed by GRS to dispense with the “print-and-file” practice after satisfying certain circumstances, all electronic message records should also be printed-and-filed in a paper-based recordkeeping system within the time-frame as specified in paragraph 3 above in accordance with the “Guideline on the Management of Electronic Messages”<sup>4</sup>.

#### Development of business rules

5. As a systematic approach to records creation / collection, sections and offices should develop business rules to document decisions as to what records are to be created / collected and kept, and who to create / collect records, amongst others, in a way that can be used by staff in their daily work,. Sections and offices should make reference to the procedures and samples in the “Guidelines on Creation and Collection of Records”<sup>5</sup> in establishing business rules. As a general rule, sections and offices should aim to establish business rules for records creation / collection covering all their business functions / activities involving structured processes. For those with less structured processes, or ad hoc / unprecedented work which may make systematic assessment difficult or impracticable, sections and offices should provide examples or generic business rules to their staff on what records should be created / collected with reference to paragraph 2 above. The business rules should be re-circulated to all staff at least once every six months.

#### Review of business rules

6. To cope with changes over time, the business rules should be reviewed at least once every two years in accordance with Checklist B of GRS’ Records Management Publication No. 7 “Topical Guide cum Checklists for Proper Records Management Practices”, which should be documented for record purposes.

### **Registration of records**

*[This section outlines the arrangements for proper registration of records captured into the official recordkeeping systems in order to provide evidence that the records have been*

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<sup>3</sup> Electronic message records include e-mail records and other electronic message records created in short message service (SMS), other instant messaging services (e.g. WhatsApp, WeChat, the instant messaging function of the Government’s new e-mail system namely the Centrally Managed Messaging Platform, etc.), and social media platforms (e.g. Facebook, Instagram and YouTube).

<sup>4</sup> “Guideline on the Management of Electronic Messages” is accessible at [http://grs.host.ccgo.hksarg/cgp\\_guidelines.html](http://grs.host.ccgo.hksarg/cgp_guidelines.html) or [https://www.grs.gov.hk/en/hksar\\_government\\_administrative\\_guidelines\\_on\\_record\\_management.html](https://www.grs.gov.hk/en/hksar_government_administrative_guidelines_on_record_management.html).

<sup>5</sup> “Guidelines on Creation and Collection of Records” is accessible at [http://grs.host.ccgo.hksarg/cgp\\_guidelines.html](http://grs.host.ccgo.hksarg/cgp_guidelines.html) or [https://www.grs.gov.hk/en/hksar\\_government\\_administrative\\_guidelines\\_on\\_record\\_management.html](https://www.grs.gov.hk/en/hksar_government_administrative_guidelines_on_record_management.html).

*created / collected. This sections also sets out the requirement for B/Ds to maintain an updated and accurate inventory of records.]*

7. A record is registered when it is captured into the official recordkeeping systems, providing evidence that it has been created / collected. In a paper-based recordkeeping 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(s) / addressee(s) of the record on the file in accordance with Chapter 15 of GRS' Records Management Publication No. 2 "Managing Active Records: File Management"<sup>6</sup>.

*Updated and accurate inventory of records*

8. An accurate inventory of records and effective records tracking are prerequisite for good records management because they facilitate efficient control, retrieval, tracking the whereabouts and disposal of records and provide basic information to support records management activities (e.g. establishing disposal schedules). Accordingly, sections and offices should prepare and maintain an updated and accurate inventory of records. The entries of newly opened paper files / electronic folders or parts in an ERKS in the records inventory should at least include the following information –

- (a) file title;
- (b) file reference number;
- (c) date opened;
- (d) date closed;
- (e) physical form and media of the records (e.g. paper-based records such as large maps, floor plans or stores vouchers books which cannot be kept inside a subject file, microfilm, electronic data stored on DVD, etc.) with cross-referencing to the covering memo or e-mail, if applicable;
- (f) storage location (e.g. room / floor), which should also be applicable to item (e) above;
- (g) relevant disposal schedule -
  - (i) for administrative records: "General Administrative Records Disposal Schedules (GARDS)" Subject Group No. and Nature / Description (e.g. GARDS 5-95 (Routine)); or

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<sup>6</sup> GRS' Records Management Publication No. 2 "Managing Active Records: File Management" is of RESTRICTED nature. Staff should approach the DRMs of respective B/Ds to obtain a copy when necessary.

- (ii) for programme records: Records Retention and Disposal Authority (DA) No. and Disposal Class (e.g. DA 20202 (Class B)); and
  - (h) disposal arrangements (including the inactive criterion, retention period and disposal action such as transfer to GRS or destruction).
9. For records maintained in a structured business system and not managed in an ERKS, a records inventory should at least include the following information –
- (a) records series title / records description (e.g. “Applications of XX Licence”);
  - (b) quantity (to be updated at least once every 12 months);
  - (c) storage location (e.g. “XX Information System”);
  - (d) relevant disposal schedule -
    - (i) for administrative records: GARDS Subject Group No. and Nature / Description; or
    - (ii) for programme records: DA No. and Disposal Class; and
  - (e) disposal arrangements (including the inactive criterion, retention period and disposal action such as transfer to GRS or destruction).
10. As regards those paper files / folders or parts in ERKS opened in the past, sections and offices should endeavor to add the information as mentioned in paragraphs 8(g) and 8(h) above in the relevant records inventories.

## **Records classification**

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

### Establishment of records classification schemes

11. To facilitate a wide range of records management activities, including identification, capturing and retrieval of records, security and access control, records should be systematically organised according to a records classification scheme (also called a file plan), which is a plan for logical arrangement of both administrative records<sup>7</sup> and programme records<sup>8</sup> according to one or more of the following: business functions, activities and contents

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<sup>7</sup> Administrative records are records of housekeeping nature created or received during the course of day-to-day administrative activities that deal with finance, accommodation, procurement and supplies, establishment, human resources and other general administrative matters. Records of this nature are common to B/Ds.

<sup>8</sup> Programme records are records created / received by the bureau / department whilst carrying out the primary

of the records.

12. The standard classification scheme for administrative records as set out in GRS' Records Management Publication No. 3 "Subject Filing"<sup>9</sup> will continue to be adopted for the classification of administrative records in the bureau / department.

13. All programme records should also be covered by classification schemes, which should be established in accordance with the procedures set out in Chapter 4 of GRS' Records Management Publication No. 2 "Managing Active Records: File Management" and Chapter 4 of GRS' Records Management Publication No. 3 "Subject Filing".

14. All registries, sections and offices should ensure that proper filing practices are implemented with reference to the procedures set out in Chapters 4-7 and 10-18 of GRS' Records Management Publication No. 2 "Managing Active Records: File Management". Reviews on filing practices should be conducted at least once every two years. 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 for record purposes. Sections and offices can make use of Checklist D of GRS' Records Management Publication No. 7 "Topical Guide cum Checklists for Proper Records Management Practices" in conducting the review.

15. A Records Manager or supervisor of staff providing records management support should be designated to control the creation, naming and coding of new files to facilitate accurate capturing and ready retrieval of records.

16. As a requirement to ensure quality, new records classification schemes of the bureau / department such as those necessitated by re-organisation or amendment(s) to the existing records classification scheme(s) such as addition of new records series, 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 will make reference to the guidelines on records classification contained in Chapter 4 of GRS' Records Management Publication No. 2 "Managing Active

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functions, activities or mission for which the bureau / department was established. Records of this nature are unique to each bureau / department.

<sup>9</sup> GRS' Records Management Publication No. 3 "Subject Filing" is accessible at [https://grs.host.ccg.hksarg/cgp\\_publications.html](https://grs.host.ccg.hksarg/cgp_publications.html) or [https://www.grs.gov.hk/en/hksar\\_government\\_administrative\\_guidelines\\_on\\_record\\_management.html](https://www.grs.gov.hk/en/hksar_government_administrative_guidelines_on_record_management.html).

Records: File Management”.

### Review of records classification schemes

17. 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 at least once every five years in accordance with Checklist C of GRS’ Records Management Publication No. 7 “Topical Guide cum Checklists for Proper Records Management Practices”. Staff not below the rank of Senior Executive Officer (SEO) 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 conducting such reviews, but the DRM will remain responsible for the overall co-ordination and effectiveness of the reviews.

18. 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 for record purposes.

### **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

19. Sections and offices should put in place appropriate arrangements to ensure the safe custody of records. Records should be stored in such a manner so as to facilitate user access and protected from unauthorised access, use, disclosure, removal, deterioration, loss or destruction. The Security Regulations<sup>10</sup> (SRs) 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 Digital Policy Office’s information technology security policy and guidelines should be followed.

20. 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

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<sup>10</sup> The Security Regulations are of RESTRICTED nature. Staff should approach the Departmental Security Officer for enquiries.

cabinets and filing racks) in a clean and dry environment.

21. 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.

22. For proper preservation of electronic records, sections and offices should make reference to "A Handbook on Preservation of Electronic Records"<sup>11</sup>. For preservation of records stored in other media, professional advice should be obtained as appropriate.

#### Review of records storage

23. Reviews on records storage should be conducted at least once every two 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 for record purposes. Sections and offices can make use of Checklist E of GRS' Records Management Publication No. 7 "Topical Guide cum Checklists for Proper Records Management Practices" in conducting the review.

#### **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.]*

24. Timely access to records should be provided to authorised records users for conducting business and other authorised purposes.

25. To provide sensitive information with adequate protection, records should be classified according to their level of sensitivity at a particular time. Classified records should

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<sup>11</sup> "A Handbook on Preservation of Electronic Records" is accessible at [https://grs.host.ccgo.hksarg/cgp\\_guidelines.html](https://grs.host.ccgo.hksarg/cgp_guidelines.html) or [https://www.grs.gov.hk/en/hksar\\_government\\_administrative\\_guidelines\\_on\\_record\\_management.html](https://www.grs.gov.hk/en/hksar_government_administrative_guidelines_on_record_management.html).

be managed in accordance with the SRs.

26. Access to records containing personal data should be arranged according to the Personal Data (Privacy) Ordinance (Cap. 486).

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

### **Movement of records**

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

#### Tracking movement of records

28. Movements of physical records should be tracked with the assistance of appropriate tools such as the Bar-Coding File Management System (BCFMS) and the ERKS.

29. Staff providing records management support should take stock of records and check the completeness of files regularly to minimise the risk of losing records.

#### Transit and bulk relocation of records

30. 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 (EO) 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 in the records inventories immediately afterwards. Sections and offices should make reference to the procedures set out in the "Guidelines on Bulk Relocation of Records"<sup>12</sup> and make use of Checklist I of GRS' Records Management Publication No. 7 "Topical Guide cum Checklists for Proper Records Management Practices" in planning and implementing bulk records relocation exercises.

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<sup>12</sup> "Guidelines on Bulk Relocation of Government Records" is accessible at [http://grs.host.ccgo.hksarg/cgp\\_guidelines.html](http://grs.host.ccgo.hksarg/cgp_guidelines.html) or [https://www.grs.gov.hk/en/hksar\\_government\\_administrative\\_guidelines\\_on\\_record\\_management.html](https://www.grs.gov.hk/en/hksar_government_administrative_guidelines_on_record_management.html).



### Loss or unauthorised destruction of records

31. Loss or unauthorised destruction of records should be immediately reported to the DRM and GRS simultaneously, i.e. within two weeks upon the discovery of the cases (including suspected cases which sections and offices concerned may continue with the search of the missing records after reporting). Upon receipt of such report, the DRM, with the assistance of the sections and offices concerned, should –

- (a) ascertain the facts and identify the circumstances leading to the loss / unauthorised destruction;
- (b) reconstruct the records where necessary and practicable;
- (c) take steps to prevent recurrence;
- (d) consider whether any disciplinary action or other administrative action is necessary; and
- (e) report his / her findings and actions on (a) to (d) above to GRS within three months.

32. The reporting requirements in other codes and regulations (e.g. SRs) should be followed for loss of records containing classified information or personal data. Sections and offices can make use of Checklist J of GRS' Records Management Publication No. 7 "Topical Guide cum Checklists for Proper Records Management Practices" to evaluate the handling of loss and unauthorised destruction of records.

### **Retention and disposal of records**

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

### Establishment of disposal schedules

33. All records, irrespective of physical format or media, should be covered by approved disposal schedules, which specify the arrangements to be made for custody (e.g. the bureau / department, GRS' Records Centre), retention period (e.g. three years) and disposal arrangement (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.

34. 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)”<sup>13</sup> should be adopted.

35. Programme records should be disposed of according to the disposal schedules established by the bureau / department and approved by GRS. Disposal schedule approved by GRS and confirmed by an officer not below the rank of SEO or equivalent is regarded as DA. 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 DA should be forwarded to the DRM for record purposes.

36. Whenever new series of programme records are created, sections and offices should prepare draft disposal schedules or amend the existing disposal schedules in accordance with the procedures set out in GRS’ Records Management Publication No.1 “A Practical Guide to Records Scheduling and Disposal”, and forward them to GRS as soon as possible, and in any event no later than two years after the records are created, such that all parties would have a clear understanding as to when and how the records should be disposed of. Draft disposal schedules should be endorsed by an officer not below the rank of SEO or equivalent. For programme records common to different regional or district offices of the bureau / department, the DRM should coordinate the drafting of the disposal schedules among them in order to develop consistent records disposal arrangements (e.g. records classification, inactive criterion, retention period and disposal action, etc.) such that one single disposal schedule will apply to all similar records in different regional or district offices of the bureau / department.

#### Review of disposal schedules

37. To cope with changes over time, DA should be reviewed at least once every five years in accordance with Checklist G of GRS’ Records Management Publication No. 7 “Topical Guide cum Checklists for Proper Records Management Practices”. 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. Upon the review, any proposed amendments to the DA should be endorsed by an officer not below the rank of SEO or equivalent and forwarded to GRS for approval. The results of the review and any follow-up action taken should be documented for record purposes.

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<sup>13</sup> GRS’ Records Management Publication No. 4 “General Administrative Records Disposal Schedules (GARDS)” is accessible at [https://grs.host.ccgo.hksarg/cgp\\_publications.html](https://grs.host.ccgo.hksarg/cgp_publications.html) or [https://www.grs.gov.hk/en/hksar\\_government\\_administrative\\_guidelines\\_on\\_record\\_management.html](https://www.grs.gov.hk/en/hksar_government_administrative_guidelines_on_record_management.html).

Regular disposal of time-expired records

38. Records disposal refers to the process by which time-expired records are –
- (a) transferred to GRS for appraisal and / or permanently retained in PRO if the records are appraised to have archival value; or
  - (b) destroyed if they are appraised as having no archival value in accordance with GARDS for administrative records or DA for programme records.

Records may be retained permanently in the bureau / department if the records are appraised to have no archival value but have permanent legal, fiscal, administrative and / or operational value, or are required by legislation. Records permanently retained in the bureau / department should be stored in an 24-hour air-conditioned and dust free environment with stable and controlled temperature and humidity. GRS may inspect such facilities and records to ensure the records with permanent value are properly preserved.

39. Regular disposal of records facilitates easy retrieval of records in active use, and minimise 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 DA for programme records. In the interest of proper internal control, disposal of records should be endorsed in writing by an officer not below the rank of SEO or equivalent.

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

41. Upon obtaining internal endorsement for the disposal as set out in paragraph 39 above, GRS Director's prior agreement must be obtained for any disposal of records via the Storage Allocation and Records Centre Information System (SARCIS).

42. To minimise the risk of inadvertent unauthorised destruction of records during the disposal process, an officer not below the rank of EO II or equivalent should be designated to ensure that the disposal process is properly supervised and the records disposal procedures set out in Chapter 6 of GRS' Records Management Publication No. 1 "A Practical Guide To Records Scheduling And Disposal" are complied with.

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

*Deferral of transfer of records to PRO*

44. Only records having archival value should be transferred to PRO according to the respective DA within two years after they have become time-expired. If there are valid reasons such as due to on-going legal proceedings to defer the transfer of time-expired records having archival value or potential archival value to PRO for permanent retention or appraisal by more than two years, written agreement of a directorate officer at the level of deputy secretary / deputy head within the bureau / department should be obtained and GRS should be consulted in advance. Such cases have to be brought up to the directorate officer for direction during the next disposal exercise.

*Transfer of records to non-government bodies*

45. In case records have to be transferred to non-government bodies due to such reasons as corporatisation, privatisation or outsourcing, 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, in particular for records having archival value. No government records should be transferred outside the Government unless with the prior agreement of the GRS Director.

46. The list should group the records by disposal schedules (i.e. GARDS and DA) and include the following information: (i) file title; (ii) file reference number; and (iii) date opened and date closed.

**Access to archival records**

*[This section outlines B/Ds' responsibility in assessing the access status of closed archival records and the procedures involved, and the arrangements of reviewing the archival records by the transferring B/Ds.]*

47. When transferring records of archival value to PRO, sections and offices should ensure that all classified enclosures kept in unclassified records have been reviewed and downgraded. After records having archival value are transferred to PRO, they will be accepted as archival records. Access to archival records kept by GRS is managed through

the Public Records (Access) Rules 1996<sup>14</sup>. In general, members of the public are allowed access to archival records which have been closed for not less than 30 years or the contents of which have at any time been published or wholly disclosed to the public. While unclassified archival records should be opened for public access automatically when reaching 30 years old, counting from the date of the last entry, the transferring sections and offices should review and determine in good time the access status of the classified archival records when reaching 30 years old before they are transferred to PRO. PRO will take it that the archival records transferred to it can be opened for public access when reaching 30 years old unless the transferring sections and offices have informed PRO the otherwise.

48. Access to closed archival records by the public requires prior application in writing to the GRS Director. To ensure timely handling of access applications, the transferring / responsible sections and offices have the responsibility to assess the access status of the records concerned and inform GRS of their comments within the time-frame specified by GRS. The GRS Director, in his or her discretion and in accordance with the general instructions of the Chief Secretary for Administration, may permit any persons to inspect closed archival records held in GRS.

49. The security grading of closed archival records should not be the only factor to be considered when vetting access applications for closed archival records. If the transferring / responsible sections and offices consider that the whole or a certain part of the closed archival records is not suitable for public access, they should indicate and elaborate their reason(s) with reference to Part 2 of the Code on Access to Information. Decision on refusal to disclose all or part of the closed archival record should be made at directorate level within the bureau / department. GRS will take into account the bureau's / department's views and make a decision on whether the closed archival records can be released for public access. GRS has institutionalised an appeal channel on access to closed archival records by enabling the public to appeal to the Director of Administration against the decision on the access application and to lodge a complaint with The Ombudsman if they are concerned about any maladministration in the handling of the access application.

50. Where a transferring / responsible section or office has reviewed that a classified archival record which has been over 30 years old but should not be opened / partly opened for access due to its sensitivity in the interim, it is required to review the access status of the record again every five years or less until the record is eventually opened for public access.

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<sup>14</sup> The Public Records (Access) Rules 1996 is accessible at <https://www.grs.gov.hk/ws/english/engimages/publicforms/access.pdf>.

### Requisitioning of Archival Records from PRO

51. If sections and offices have to inspect the archival records transferred by them to PRO for permanent retention, an officer not below the rank of SEO or equivalent should initiate a requisition request for on-site inspection of archival records at the Hong Kong Public Records Building; or over-night loan of archival records to the sections and offices.

### **Practices and guidelines for ERKS**

*[If an ERKS is implemented, this section briefly outlines the departmental records management practices and guidelines for ERKS.]*

52. Owing to the inherent difference in the records management processes and procedures between the paper-based recordkeeping environment and the ERKS environment, sections and offices should make reference to the departmental “Handbook on Records Management Practices and Guidelines for ERKS” in using, managing and maintaining the ERKS, such as the roles and responsibilities of ERKS users and the processes and procedures for performing records management tasks in the ERKS.

### **Documenting records management processes**

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

53. 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, programme, procedures and guidelines;
- (b) designation of records management roles and responsibilities;
- (c) decisions on records creation / collection and review of business rules;
- (d) records inventory;
- (e) establishment, adoption and review of records classification schemes;

- (f) review of records storage;
- (g) access control of records;
- (h) movement of records;
- (i) establishment and review of disposal schedules;
- (j) internal endorsement on and GRS' approval for disposal of records;
- (k) deferral of transfer of records having archival value or potential archival value to PRO;
- (l) records disposal procedures;
- (m) bulk relocation of records procedures;
- (n) transfer of records to other sections and offices within the bureau / department, other bureaux / departments or outside the Government;
- (o) investigation and follow-up action on loss or unauthorised destruction of records;
- (p) review of access status of closed / partly closed archival records; and
- (q) review, monitoring and auditing of records management.

54. Sections and offices are required to document other records management processes 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.]*

55. From time to time, there are such administrative changes as re-organisation of business functions and activities which necessitate transfer of records between sections and offices of the bureau / department, or to / from other bureaux / departments. Such transfers should be properly managed in accordance with the procedures set out in Chapter 8 of the

“Records Management Manual”<sup>15</sup> including preparing an accurate list of records to be transferred, updating records inventory / records classification scheme(s) / disposal schedules, adopting the procedures on bulk relocation of records etc. To ensure effective co-ordination, the DRM should be informed of transfer of records between bureaux / departments.

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<sup>15</sup> The “Records Management Manual” is accessible at [http://grs.host.ccgo.hksarg/cgp\\_guidelines.html](http://grs.host.ccgo.hksarg/cgp_guidelines.html) or [https://www.grs.gov.hk/en/hksar\\_government\\_administrative\\_guidelines\\_on\\_record\\_management.html](https://www.grs.gov.hk/en/hksar_government_administrative_guidelines_on_record_management.html).



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

General Circulars and Administration Wing Circular Memoranda related to records management as well as the Records Management Publications, Records Management Manual (RMM), and other guidelines promulgated by the Government Records Service (GRS) are available at the records management theme page on the Central Cyber Government Office (CCGO) at [https://grs.host.ccgo.hksarg/cgp\\_intro.html](https://grs.host.ccgo.hksarg/cgp_intro.html), the electronic records management theme page on CCGO at <https://grs.host.ccgo.hksarg/erm/> and GRS' website at [https://www.grs.gov.hk/en/hksar\\_government\\_administrative\\_guidelines\\_on\\_record\\_management.html](https://www.grs.gov.hk/en/hksar_government_administrative_guidelines_on_record_management.html). GRS has also disseminated standard forms and templates to facilitate bureaux and departments in carrying out records management activities at [https://grs.host.ccgo.hksarg/forms\\_draft.html](https://grs.host.ccgo.hksarg/forms_draft.html).

### Government Records Management Policy

- Paragraphs 5 - 8 of General Circular (GC) No. 3/2024 “Management of Government Records”
- Chapter 2 of GRS' Records Management Publication No. 2 “Managing Active Records: File Management”
- Paragraphs 200 - 205 of RMM
- Departmental Records Management Policy: An Example

### Mandatory Records Management Requirements

- Paragraphs 3 - 44 of GC No. 3/2024 “Management of Government Records”
- Annex A to GC No. 3/2024 “Management of Government Records”

### General Records Management Practices Advocated by GRS

- GRS' Records Management Publication No. 2 “Managing Active Records: File Management”
- RMM
- Guidelines for Managing Records in a Hybrid Environment

### Regulatory Environment

- Paragraph 122 of RMM

### Roles and Responsibilities

- Paragraphs 9 - 10 of GC No. 3/2024 “Management of Government Records”
- Annex B to GC No. 3/2024 “Management of Government Records”
- Paragraphs 206 - 219 of RMM

### Recordkeeping System

- Paragraphs 400 - 403 of RMM

### Creation / Collection of Records and Business Rules

- Paragraphs 11 - 14 of GC No. 3/2024 “Management of Government Records”
- Chapter 3 of GRS’ Records Management Publication No. 2 “Managing Active Records: File Management”
- Paragraphs 300 - 318 of RMM
- Guidelines on Creation and Collection of Records
- Guideline on the Management of Electronic Messages (including procedures on printing and filing electronic mail records)

### Registry Management

- Chapters 11 and 18 of GRS’ Records Management Publication No. 2 “Managing Active Records: File Management”

### Records Classification

- Paragraphs 15 - 19 of GC No. 3/2024 “Management of Government Records”
- Chapters 4 and 14 of GRS’ Records Management Publication No. 2 “Managing Active Records: File Management”
- GRS’ Records Management Publication No. 3 “Subject Filing”
- Paragraphs 414 - 449 of RMM
- Guidelines on the Implementation of the Standard Classification Scheme for Administrative Records

### Filing Procedures

- Chapters 4 - 5, 10, 12 - 15 and 17 of GRS’ Records Management Publication No. 2 “Managing Active Records: File Management”
- Paragraphs 404 - 413 and 450 - 459 of RMM
- Guidelines on Filing Practices

### Records Custody and Storage

- Paragraph 36 of GC No. 3/2024 “Management of Government Records”
- Chapter 6 of GRS’ Records Management Publication No. 2 “Managing Active Records: File Management”
- Paragraphs 500 - 523 of RMM

### Records Inventory, Access Control and Tracking Movement of Records

- Paragraphs 20 - 22 of GC No. 3/2024 “Management of Government Records”
- Chapters 7 and 16 of GRS’ Records Management Publication No. 2 “Managing Active Records: File Management”
- Paragraphs 460 - 482 of RMM

### Bulk Relocation of Records

- Paragraph 37 of GC No. 3/2024 “Management of Government Records”
- Chapter 6 of GRS’ Records Management Publication No. 2 “Managing Active Records: File Management”
- Guidelines on Bulk Relocation of Government Records

### Loss and Unauthorised Destruction of Records

- Paragraph 38 of GC No. 3/2024 “Management of Government Records”
- Chapter 6 of GRS’ Records Management Publication No. 2 “Managing Active Records: File Management”

### Retention and Disposal of Records

- Paragraphs 23 - 34 of GC No. 3/2024 “Management of Government Records”
- GRS’ Records Management Publication No. 1 “A Practical Guide to Records Scheduling and Disposal”
- Chapter 8 of GRS’ Records Management Publication No. 2 “Managing Active Records: File Management”
- GRS’ Records Management Publication No. 4 “General Administrative Records Disposal Schedules (GARDS)”
- Paragraphs 600 - 639 of RMM
- Explanatory Notes to Records Inventory Form (RMO1)
- Guidelines for Transferring Records to Public Records Office for Appraisal
- Guidelines for Transferring Records to Public Records Office for Permanent Retention
- Guideline cum Checklist for Review of Records Retention and Disposal Schedules
- Guidance Notes on Dissemination of Information about Disposal of Records of Bureaux

/ Departments

#### Transfer of Records to Non-government Bodies

- Paragraph 35 of GC No. 3/2024 “Management of Government Records”
- Chapter 19 of GRS’ Records Management Publication No. 2 “Managing Active Records: File Management”

#### Access to Archival Records

- Paragraphs 31 and 41 - 44 of GC No. 3/2024 “Management of Government Records”
- Paragraphs 460 - 472 of RMM
- Procedures of Requisitioning of Archival Records from the Public Records Office

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

- Chapters 5 and 6 of GRS’ Records Management Publication No. 1 “A Practical Guide to Records Scheduling and Disposal”
- Guidelines for Transferring Records to Records Centre
- Supply of Carton Boxes for Inactive Records to be Transferred to the Records Centre

#### Vital Records Protection

- Paragraph 39 of GC No. 3/2024 “Management of Government Records”
- Chapter 9 of GRS’ Records Management Publication No. 2 “Managing Active Records: File Management”
- GRS’ Records Management Publication No. 6 “Manual on Vital Records Protection”
- Paragraphs 700 - 730 of RMM

#### Managing Records for Administrative Changes

- Paragraphs 800 - 838 of RMM

#### Monitoring and Auditing

- GC No. 5/2012 “Records Management Reviews”
- Paragraph 40 of GC No. 3/2024 “Management of Government Records”
- GRS’ Records Management Publication No. 7 “Topical Guide cum Checklists for Proper Records Management Practices”
- Paragraphs 900-917 of RMM

#### Electronic Records Management

- A Handbook on Records Management Practices and Guidelines for an Electronic

## Recordkeeping System

- Guideline on the Management of Electronic Messages
- Disposal of Original Records (for records that have been digitised and stored in a digital form)
- A Handbook on Preservation of Electronic Records

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**Important Points to Note for General Records Users**

*[This Appendix outlines the important points to note for general records users who by functions of their posts are not required to undertake records management duties.]*

**Creation/Collection of Records**

All government officers have the responsibility to create/collect records under their purview. The creation/collection of records should be adequate but not excessive. To ensure timely filing, under normal circumstances, records should be captured in a departmental recordkeeping system (e.g. paper-based recordkeeping system or electronic recordkeeping system (ERKS)) within 30 days upon creation/receipt and under exceptional circumstances, records could be captured within three months.

**Capture of Electronic Message Records**

Electronic message records<sup>1</sup> should be captured directly to an ERKS once implemented. Unless agreed by GRS to dispense with the “print-and-file” practice, all electronic message records should also be “printed-and-filed” within the time-frame as specified above, i.e. subject officers should arrange to print an electronic message record directly from the software<sup>2</sup> creating that message for filing in an appropriate paper-based recordkeeping system.

**Custody and Storage of Records**

Appropriate arrangements should be put in place to ensure the safe custody of records. Records should be stored in such a manner so as to facilitate user access and protected from unauthorised access/use/disclosure/removal, deterioration, loss or destruction.

**Loss or Unauthorised Destruction of Records**

Loss or unauthorised destruction of records should be immediately reported to the DRM and GRS simultaneously, i.e. within two weeks upon the discovery of the cases (including suspected cases which B/Ds may continue with the search of the missing records after reporting).

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<sup>1</sup> Electronic message records include e-mail records and other electronic message records created in short message service (SMS), other instant messaging services (e.g. WhatsApp, WeChat, the instant messaging function of the Government’s new e-mail system namely the Centrally Managed Messaging Platform, etc.), and social media platforms (e.g. Facebook, Instagram and YouTube).

<sup>2</sup> If an electronic message record is exported or copied to other software for printing, its structure (e.g. header and body of the electronic message) which affects understanding of the information contained therein may not be accurately presented.