

22 April 2009

General Circular No. 2/2009

Mandatory Records Management Requirements

(Note: Distribution of this Circular is Scale C. It should be brought to the attention of officers who, because of the functions of their posts, are required to take action on, or to be informed of, the Circular.)

This Circular sets out mandatory requirements on the management of government records. It should be read in conjunction with General Circular No. 5/2006 entitled “Management of Government Records” which contains comprehensive advice on good records management.

Introduction of Mandatory Records Management Requirements

2. Records¹ 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. Good records management enhances operational efficiency and effectiveness while minimizing costs. Records management is therefore an important function of bureaux and departments (B/Ds). In addition, the Government is committed to identifying and preserving government records having archival value so as to enhance public awareness of Hong Kong’s documentary heritage. Heads of B/Ds should accord appropriate priority and resources to implement a proper records management programme throughout their organizations. B/Ds should also cooperate with the Government Records Service (GRS) to ensure proper preservation of records and materials with archival value.

3. To promote best practices for the management of government records in B/Ds, we published the **Records Management Manual (RMM)** and the

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.

Guideline on the Management of Electronic Mail in 2001 and a series of records management publications².

4. Since then most B/Ds have already established a records management programme. It is now an opportune time to introduce a number of mandatory and essential records management requirements in order to demonstrate Government's commitment to practise good records management and preserve archival records. Opportunity is also taken to specify the level of responsible officers in important record management activities to ensure that these activities are properly attended to in B/Ds.

Designation of Departmental Records Manager

5. The **Departmental Records Manager (DRM)** of each B/D has a key role to play in records management and a sufficiently senior officer should be designated to take up the responsibility. The normal practice is for the Departmental Secretary to serve as DRM. As a general guideline, an officer not below the rank of Senior Executive Officer or equivalent should be designated as the DRM to ensure that there is adequate attention from senior management on records management. B/Ds with their DRMs assumed by officers below the rank of Senior Executive Officer or equivalent should designate another officer at the appropriate rank as DRM and advise the GRS of the change within two months. The GRS should also be informed of any replacement of their DRM as soon as this takes place, and in any case not later than two weeks after the replacement. A list of major duties of the DRM is at **Appendix I**. As records management is a joint effort, all officers in a B/D should cooperate with their DRM, particularly in complying with the mandatory requirements set out in this Circular.

Maintaining an Accurate Records Inventory

6. An accurate inventory of records is a prerequisite for good records management because it facilitates efficient control and retrieval of records and provides basic information to support records management activities (e.g. establishing records disposal schedules). Accordingly, it is incumbent upon all B/Ds to **prepare and maintain an accurate inventory of records** if they have not already done so. Such records inventory should be regularly updated to cater for changes. A records inventory on files should at least include the following information –

² The Records Management Manual, the Guideline on the Management of Electronic Mail and other records management publications, such as Publication No. 1 "A Practical Guide to Records Scheduling and Disposal", Publication No. 2 "Managing Active Records: File Management", Publication No. 3 "Subject Filing" and Publication No. 4 "General Administrative Records Disposal Schedules" can be accessed at <http://grs.host.cgo.hksarg/>.

- (a) file title;
- (b) file reference number;
- (c) date opened and date closed; and
- (d) storage location (e.g. room/ floor).

Proper Management of Electronic Mail Records

7. Apart from paper records, e-mails created or received in the course of official business should be kept as records to serve as evidence of such business. E-mail records include, for example, internal and external communication relating to the functions and activities of the B/D, information pertinent to the decision making process, formulation of policies and procedures and transaction of business. In case of doubt as to whether a particular e-mail should be kept as record, an officer should seek guidance from his supervisor. The use of electronic recordkeeping system for keeping electronic records is being studied by GRS together with the Office of the Government Chief Information Officer and the Efficiency Unit. In the meantime and unless otherwise agreed by GRS, e-mail correspondence should be “**printed-and-filed**” for record purposes, i.e. subject officers should arrange to print an e-mail record directly from the e-mail software³ for filing in an appropriate paper-based file similar to other records.

Records Classification

Establishment of new records classification schemes

8. 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 records according to one or more of the following: business functions, activities and contents of the records. It includes a coding system expressed in symbols (e.g. alphabetical, numerical and alpha-numerical) to show the logical relationship amongst the records. An effective records classification scheme is conducive to effective records management. As a requirement to ensure quality, **new classification schemes for a B/D** such as those necessitated by re-organisation **should from now on be approved by its 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** which are derived from existing guidelines on content classification contained in paragraphs 414-420 of the RMM and guidelines on records classification contained in paragraphs 3.9-3.12 and

³ If an e-mail record is exported or copied to other software for printing, its structure (e.g. e-mail header and body) which affects understanding of the information contained therein may not be accurately presented.

3.16 of GRS' Records Management Publication No. 2 "Managing Active Records: File Management".

Administrative records

9. 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. The GRS has promulgated a standard classification scheme for administrative records, which provides standard primary subject terms on administrative activities to help B/Ds achieve a higher efficiency and accuracy in organizing common administrative records and in disposing of such records. The standard classification scheme and the standard disposal schedules for administrative records are detailed respectively in GRS' Records Management Publication No. 3 "Subject Filing" and Publication No. 4 "General Administrative Records Disposal Schedules". While B/Ds may add secondary, tertiary and other lower level terms under the primary terms to suit their circumstances, they are required to seek GRS' prior agreement for addition of a new primary term to the standard classification scheme, so that timely action can be taken to establish a corresponding disposal schedule.

10. Since the introduction of the standard classification scheme in 1994, B/Ds have been adopting the standard scheme gradually to manage their administrative records. To reap the full benefits set out in paragraphs 8 and 9 above, B/Ds which have yet to **adopt the standard classification scheme for all their administrative records** are required to do so without further delay and, in any event, **not later than April 2012**. For the few B/Ds which have yet to be covered by GRS' records management studies, they should comply with this requirement three years after completion of the studies.

Programme records

11. 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. B/Ds should make reference to the procedures set out in GRS' Records Management Publication No. 3 to develop its own classification scheme for programme records.

Regular review of records classification schemes

12. A records classification scheme allows modifications such as addition of new records series to cater for changing circumstances. To ensure that each scheme remains effective to cope with changes over time and to identify scope for improvement, the DRM is required to **review the records classification**

— **schemes every two to three years**, having regard to the principles set out in **Appendix II**. The results of the review and any follow-up action taken should be documented. Some large departments may need to designate staff at regional/district level to conduct such reviews. In such cases, the designated staff should not be below the rank of Senior Executive Officer or equivalent, and the DRM will remain responsible for the overall co-ordination and effectiveness of the review.

Records Disposal

Establishing disposal schedules for all programme records

13. It is important to establish **disposal schedules** to ensure systematic planning and orderly implementation of records disposal after records have been kept the right length of time to meet the purposes they are created and in compliance with legal or statutory requirements. This will facilitate subsequent transfer of inactive records to GRS' records centres for intermediate storage, transfer of archival records to the Public Records Office of GRS for permanent retention or destruction of unwanted records.

14. To dispose of **administrative records**, B/Ds should adopt the set of disposal schedules developed by GRS and detailed in GRS' Records Management Publication No. 4 "General Administrative Records Disposal Schedules". For **programme records**, B/Ds should, in consultation with GRS, develop **disposal schedules** which stipulate the length of time that records should be retained and the ways of disposal (e.g. destruction; intermediate storage at records centre and then destruction; microfilming and then destruction; permanent retention) having regard to the administrative, operational, fiscal and legal requirements and archival values of the records⁴.

15. With experience gained in the disposal of their administrative and programme records and in establishing disposal schedules for many of their programme records, B/Ds should now be in a position to establish disposal schedules for all their programme records. Accordingly, **B/Ds are required to prepare and forward to GRS draft disposal schedules covering all their programme records not later than April 2012**. These draft disposal schedules should be endorsed by an officer not below the rank of Senior Executive Officer or equivalent. GRS will consider the draft disposal schedules and discuss with the B/D concerned regarding the proposed retention period and disposal action with a view to finalizing the disposal schedules. Finalized disposal schedules should be signed by an officer not below the rank of Senior Executive Officer or equivalent in the B/D concerned. For new series of programme records created

⁴ Chapter 4 of GRS' Records Management Publication No. 1 "A Practical Guide to Records Scheduling and Disposal" sets out procedures on drafting disposal schedules for programme records.

after April 2012, B/Ds should forward draft disposal schedules to GRS within a period of two years.

Transferring records having archival value to GRS

16. Some records may contain information having archival value (as appraised by the Public Records Office of GRS and indicated in approved disposal schedules) which forms part of the memory of the community. **B/Ds should transfer their records having archival value to the Public Records Office of GRS according to the respective disposal schedules.**

Disposal of time-expired records

17. Regular disposal of records facilitates easy retrieval of records in active use, and minimizes costs for maintaining and storing records. Accordingly, it is necessary to arrange prompt disposal of time-expired records, i.e. inactive records which have been retained for the period specified in the “General Administrative Records Disposal Schedules (GARDS)” for *administrative records* or the approved disposal schedules for *programme records* and are ready for disposal. As a requirement, B/Ds should from now on **dispose of time-expired records at least once every two years** for all their administrative records, which are covered by GARDS, and for all their programme records with approved disposal schedules. In the interest of proper internal control, disposal of records, including destruction of records, should be considered and endorsed in writing by a senior officer not below the rank of Senior Executive Officer or equivalent in the B/D. The records disposal process in respect of administrative records and programme records is shown in the flow chart at **Appendix III** for reference. If there are valid reasons to defer the transfer of time-expired records having archival value or potential archival value to the Public Records Office of GRS for retention or appraisal by more than two years, they should be set out in writing for agreement by a directorate officer in the concerned B/D. Such cases have to be brought up to the directorate officer for direction during the next disposal exercise.

Prior consent before destruction of records

18. **B/Ds must obtain the prior agreement of the GRS Director before they destroy any government records.** This is to safeguard against premature disposal of records and destruction of records having archival value. GRS will process B/Ds’ requests as soon as possible.

19. To minimize the risk of inadvertent unauthorized destruction of records during the disposal process, B/Ds should designate an officer not below the rank of Executive Officer II or equivalent to **ensure that the disposal process is**

properly supervised and the records disposal procedures as set out in **Appendix IV** are complied with.

Transferring government records to non-government bodies

20. In case a B/D needs to transfer its records to non-government bodies due to such reasons as corporatization, privatization or outsourcing, the DRM should send a list of records pending transfer to the GRS Director for prior agreement so that appropriate arrangements can be made for records having archival value. The list should group the records by disposal schedule and include the information set out in paragraph 6(a) to (c) above, i.e. file title, file reference number, date opened and date closed. **No government records should be transferred outside the Government unless with the prior agreement of the GRS Director.**

Proper Custody and Storage of Records

21. B/Ds should **put in place appropriate arrangements to ensure the safe custody of records.** To minimize the risk of losing records during bulk relocation of files, appropriate arrangement should be made during the process. These include: designating an officer not below the rank of Executive Officer II or equivalent to oversee the task; taking stock before the relocation exercise; conducting a file inventory check after relocation; documenting the inventory check and updating the new storage location immediately afterwards.

22. 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 should –

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

23. Records should be stored in such a manner so as to facilitate user access and protected from unauthorized access, use, disclosure, removal, deterioration,

loss or destruction. At present, most government records are in paper form. Paper deteriorates rapidly in an environment of high temperature and high humidity. Furthermore, mould growth on paper is a health hazard to staff. Records should therefore be stored in proper facilities (e.g. filing cabinets, filing racks) in a clean and dry environment. Consideration may be given to making use of GRS' records centres as an intermediate storage for inactive records not requiring frequent retrieval.

Protecting Vital Records

24. Vital records are those records containing information essential to the continued and effective operation of an organization during and after an emergency or disaster. B/Ds should **identify and protect their vital records** by way of duplication or off-site storage to ensure uninterrupted operation of major business functions. For B/Ds who have yet to take action in this regard, they are required to **draw up an action plan not later than April 2012** to establish and implement a vital records protection programme⁵.

Regular Review of Records Management Practices

25. To ensure that their records management programme is functioning effectively, B/Ds should review their records management practices regularly. The review should include -

- (a) assessment of compliance with the mandatory records management requirements set out in this Circular (e.g. progress in implementing the standard classification scheme for administrative records, establishing draft disposal schedules for programme records etc.); and
- (b) identification of areas requiring improvement with regard to desirable best practices and formulation of plans to implement improvement measures.

26. To assist B/Ds in this task, GRS will issue a further guideline setting out the scope and issues for review. The completed review should be endorsed by a directorate officer and returned to GRS.

Summary of Requirements

27. In sum, B/Ds are required to -

⁵ Detailed guidelines and procedures for establishing a vital records protection programme are given in GRS' Records Management Publication No. 6 "Manual on Vital Records Protection".

- (a) review whether there should be any change to staff designated as the DRM and inform GRS of any replacement of the DRM (para. 5);
- (b) prepare and maintain an accurate records inventory (para. 6);
- (c) print-and-file e-mail records (para. 7);
- (d) ensure that any new records classification scheme is approved by the DRM (para. 8);
- (e) adopt the standard classification scheme designed by GRS for all administrative records not later than April 2012 (para. 10);
- (f) review records classification schemes every two to three years (para. 12);
- (g) establish draft disposal schedules for all existing programme records not later than April 2012 (para. 15);
- (h) transfer records having archival value to GRS according to the respective disposal schedules (para. 16);
- (i) dispose of time-expired records at least once every two years, with disposal of records considered and endorsed in writing by a senior officer (para. 17);
- (j) obtain prior agreement from the GRS Director before destruction of records (para. 18);
- (k) ensure that the records disposal process is properly supervised (para. 19);
- (l) obtain prior agreement from the GRS Director before transferring government records to non-government bodies (para. 20);
- (m) put in place arrangements to ensure proper custody and storage of records, and investigate any loss or unauthorized destruction of records (paras. 21-23);
- (n) draw up an action plan not later than April 2012 to identify and protect vital records (para. 24); and
- (o) review records management practices regularly (paras. 25-26).

28. In addition to the DRM, B/Ds may consider designating appropriate staff to ensure the compliance of the mandatory records management requirements set out in this Circular.

Assistance from GRS

29. Enquiries arising from this Circular may be addressed to Chief Executive Officer (Records Management and Administration) on 2195 7818 or Senior Executive Officer (Records Management) on 2195 7789. GRS will arrange seminars / briefings to assist B/Ds in meeting the requirements set out in this Circular.

(Miss Jennifer Mak)
Director of Administration

c.c. Judiciary Administrator

Major Duties of Departmental Records Manager

- (a) Ensure that the design of the recordkeeping system, the choice of equipment and the use of resources and space are as efficient and cost-effective as possible;
- (b) Establish, implement and document departmental records management practices and procedures according to the guidelines and instructions of the GRS;
- (c) Provide records management staff with appropriate training and guidance to supplement those provided by GRS, having regard to the operational needs of the B/D;
- (d) Appoint Assistant Departmental Records Manager(s), where necessary, to monitor records management routines;
- (e) Introduce the use of technology in a cost-beneficial manner to any aspect of the records management function that improves operation of the organization and helps achieve the records management policy of the government;
- (f) Use GRS' records centres as far as practicable to store, service and dispose of inactive records;
- (g) Facilitate records appraisal and records access review conducted by the Public Records Office of GRS and ensure prompt and systematic transfer of archival records to the Public Records Office for preservation;
- (h) Identify and protect vital records so as to ensure their availability in the event of any emergency or disaster;
- (i) Foster cooperation between records management personnel and other staff to facilitate the most effective management of departmental records;
- (j) Cooperate with GRS in evaluating and improving the effectiveness of the records management programme on a regular basis;
- (k) Approve new records classification schemes and review records classification schemes every two to three years;

- (l) Conduct investigation into cases involving loss or unauthorized destruction of records, take appropriate follow-up action, and report findings to GRS; and
- (m) Consult GRS when records management advice is required.

(Notes: This list is adapted from Appendix C to the Records Management Manual, with items (k) and (l) added to reflect the new duties arising from this Circular.)

Principles in Establishing / Reviewing Records Classification Schemes

The Departmental Records Manager is required to have regard to the following in approving a new records classification scheme or reviewing records classification schemes -

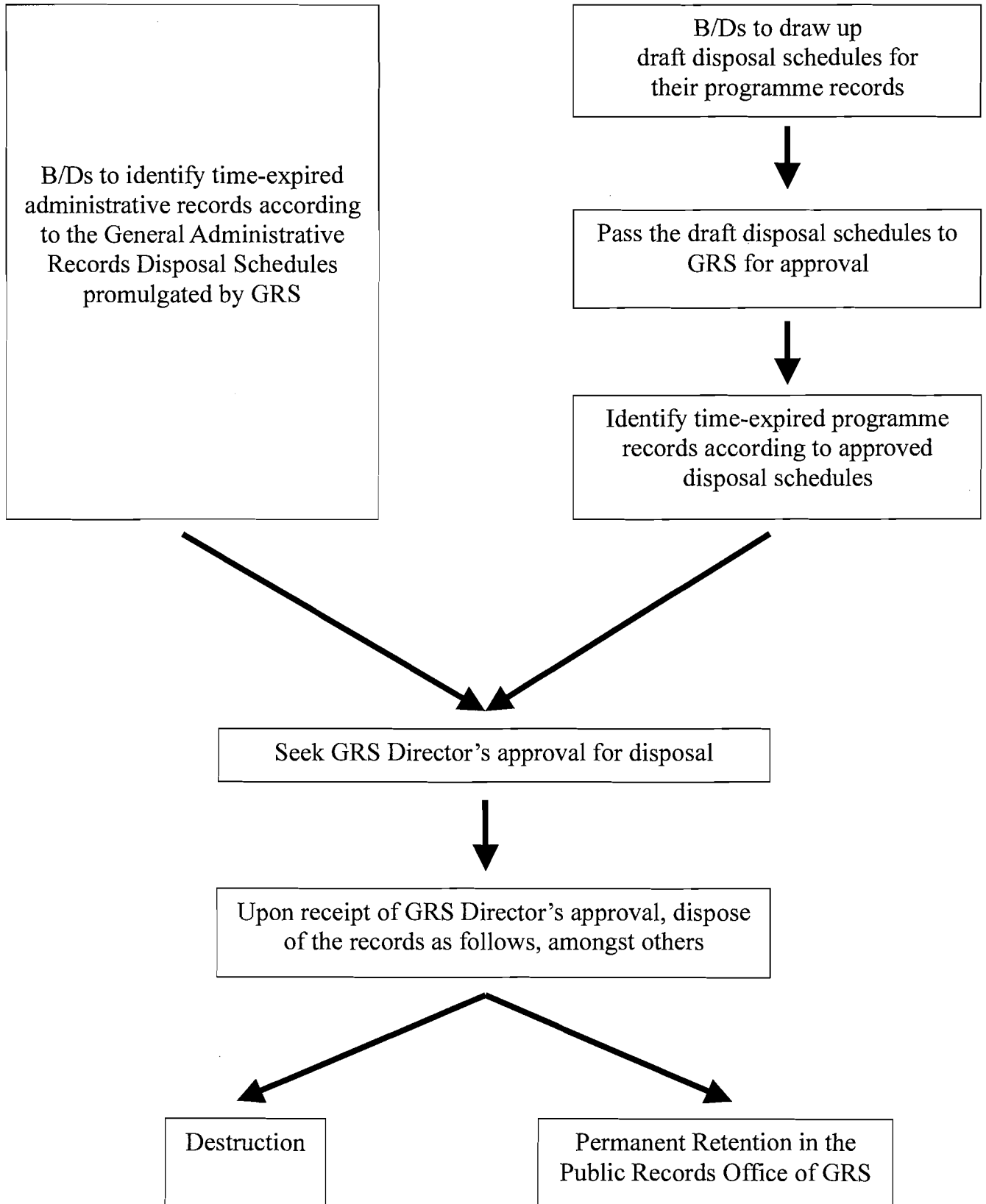
- (a) whether programme records are separated from administrative records;
- (b) whether the scheme is systematic, logical, consistent and scalable to facilitate accurate and complete documentation of policies, procedures and decisions for the efficient carrying out of the B/D's functions, activities and transactions;
- (c) whether the scheme can be used easily and the file titles are clear and unique (e.g. avoid the use of "general"/"miscellaneous") to facilitate accurate capturing and ready retrieval of records; and
- (d) whether the scheme facilitates segregation of vital records for protection and establishment of disposal schedules to satisfy retention requirement stipulated by legislation (e.g. Personal Data (Privacy) Ordinance) and to separate records which need to be kept for a long period (e.g. those on policy) from those which need to be kept briefly (e.g. routine correspondence).

(Notes: The principles in this Appendix are derived from paragraphs 414-420 of the Records Management Manual and paragraphs 3.9-3.12 and 3.16 of GRS' Records Management Publication No. 2 "Managing Active Records: File Management".)

Flow Chart Showing Major Steps to Dispose of Records

For administrative records

For programme records



Procedures on Records Disposal

(a) Preparing an accurate list of files to be disposed of

For records under the custody of B/Ds, files to be disposed of should be physically checked against the list to ensure its accuracy. For records stored in GRS' records centres, B/Ds may make use of the records transfer list for the purpose of seeking GRS' agreement for disposal. The list should be updated to exclude files already retrieved from the records centres.

(b) Ensuring the completeness of files having archival value

For records kept by B/Ds where the relevant disposal schedule stipulates that the files should be transferred to the Public Records Office of GRS for appraisal of archival value or for permanent retention, the contents of the files should be checked to ensure that no enclosures or minute sheets are missing.

(c) Segregation of records approved for destruction

For records kept by B/Ds, upon receipt of GRS' approval for destruction, an officer should be tasked to identify the relevant records and check to ensure that records approved for destruction do not mix up with those pending approval.

(d) Documentation for accountability

The checks in (a), (b) and (c) above should be documented for accountability.

(Notes: Bureaux/departments were advised of these procedures among other measures to minimize loss and inadvertent destruction of government records in GRS' memo (1) in LM (2) in GRS RC 30/0 dated 13 May 2008.)