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Government of the Hong Kong
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General Circular No. 3/2024

Management of Government Records

(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 should be re-circulated to the relevant officers for attention at least once every six months.)

Purpose

      This Circular aims to (a) provide comprehensive guidelines on management of government records throughout their different stages of the life cycle; and (b) set out the updated list of mandatory requirements on records management for compliance of government officers. General Circulars No. 5/2006 and No. 2/2009, as well as Administration Wing Circular Memoranda No. 4/2012 and No. 5/2012 are hereby cancelled.

Background

2.   The Government has published the "Records Management Manual"[1] to promote best practices for the management of government records for reference and compliance of bureaux and departments (B/Ds). A number of General Circulars, Administration Wing Circular Memoranda and various publications have also been issued on records management over the past two decades. Upon reviewing the records management practices against nowadays standards, we have suitably refined the guidelines and introduced new mandatory requirements to provide a more efficient records management mechanism in the Government and to better meet the rising expectation of the public. Moreover, the opportunity is

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[1] The "Records Management Manual" is accessible at the records management theme page on Central Cyber Government Office (CCGO) at http://grs.host.ccgo.hksarg/cgp_guidelines.html or on GRS' website at https://www.grs.gov.hk/en/hksar_government_administrative_guidelines_on_record_management.html.

also taken to consolidate the existing guidelines and requirements on records management set out in different circulars into one for ease of reference.

Mandatory Records Management Requirements

3.　　Records[2], irrespective of its 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.　Good records management enhances operational efficiency and effectiveness while minimising costs.　Records management is therefore an important function of B/Ds.　Failure to comply with the guidelines set out in this Circular, in particular the Mandatory Records Management Requirements[3] (MRs), adversely reflects on the attitude of government officers on proper record management and may render themselves liable to disciplinary or administrative actions.

4.　　The concept of MRs was first introduced in General Circular No. 2/2009. In that circular, we had set out 17 MRs which we considered crucial to good records management and expected B/Ds' full compliance.　As over a decade has lapsed since then and in view of the rapid growth of electronic records resulting in a hybrid records management environment, we have reviewed and confirmed the continuing needs to maintain 17 existing MRs, and introduced seven new MRs to reflect the latest development, resulting in a total of 24 MRs.　A list of the MRs is set out at **Annex A** for ease of reference.　These MRs (which are **bolded**) will be explained in detail by different stages of the life cycle of a record as well as other related issues in the ensuing paragraphs.　For the records management functions which B/Ds are required to conduct or review regularly by virtue of the relevant MRs, the related schedules are summarised at **Annex B** for ease of reference.

Policy and Overseeing Responsibilities

Establishment of Departmental Records Management Policy

5.　　Good records management require actions immediately upon the establishment of a B/D before any records are created.　To ensure compliance

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[2]　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.

[3]　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 B/Ds.

with the Government's records management policy, it is important that such government policy is put into the context of individual B/Ds for the easy understanding and effective administration by staff members. It is incumbent upon B/Ds to **develop and establish a departmental records management policy** in their organisations 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 an organisation. Such a policy is also a key component of good corporate governance.

6. As a general rule, all B/Ds should draw up a departmental records management policy within three months upon their establishment, or any administrative change that renders the existing departmental records management policy no longer applicable (such as re-organisation).

7. A departmental records management policy is a document 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) objectives;
    (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.

8. B/Ds may refer to the example of a departmental records management policy posted on the records management theme page on Central Cyber Government Office (CCGO) or the website of Government Records Service (GRS) in establishing their respective policies[4]. To facilitate B/Ds to remind general records users of the salient points that are more relevant to them, a new Appendix on "Important Points to Note for General Records Users" is added to the example. **B/Ds should promulgate their departmental records management policy to all staff**, in particular 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 of non-compliance and, most importantly, to make staff

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[4] "Departmental Records Management Policy : An Example" is accessible at
http://grs.host.ccgo.hksarg/act_policy.html or
https://www.grs.gov.hk/en/hksar_government_administrative_guidelines_on_record_management.html

aware of their records management responsibilities as defined under the policy. If necessary, B/Ds should develop further guidelines and procedures for compliance by their staff, 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 provide GRS with a copy of the departmental records management policy upon their promulgation, and **re-circulate it to all staff at least once every six months**. To cope with changing circumstances, B/Ds should also **review the policy and supplementary departmental guidelines, if any, at least once every two years**[5], **which should be documented for record purposes**.

Designation of Departmental Records Manager

9. Every B/D should **designate a Departmental Records Manager (DRM)** to oversee records management issues in his / her B/D. The DRM should normally be the Departmental Secretary and an officer not below the rank of Senior Executive Officer or equivalent[6]. **In case the DRM is not a directorate officer, the B/D should also appoint a directorate officer as the overseeing officer to make sure that the subject would receive due attention from the senior management**. In the rare cases where a non-directorate DRM reports directly to the Head of Department, the Head of Department should assume the role of overseeing officer.

10. Generally speaking, the responsibilities of the DRM, as set out at **Annex C**, include monitoring the records management issues; ensuring compliance with the MRs in his / her B/D as well as serving as a contact point with GRS. B/Ds should **inform GRS of any replacement of their DRM as soon as this takes place, and in any case no later than two weeks after the replacement**. As records management is a joint effort, all government officers are obliged to co-operate with their DRMs, particularly in complying with the MRs set out in this Circular.

Creation and Collection of Records

11. Records should be created or collected to –

    (a) meet operational, policy, legal and financial purposes; and
    (b) document accurately and adequately government functions, policies, procedures, decisions and transactions to serve as reliable evidence.

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[5] Please refer to Checklist A of GRS' Records Management Publication No. 7 "Topical Guide cum Checklists for Proper Records Management Practices" which is designed for reviewing the departmental records management policy and programme. Publication No. 7 is accessible at https://grs.host.ccgo.hksarg/cgp_publications.html or https://www.grs.gov.hk/en/hksar_government_administrative_guidelines_on_record_management.html.

[6] An officer not below the rank of Senior Executive Officer or equivalent should be an officer whose rank's maximum pay point is not lower than Master Pay Scale (MPS) Point 44 or equivalent.

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**.

Development of Business Rules for Records Creation/Collection

12.   As a systematic approach to records creation/collection, B/Ds should **develop business rules** to document decisions as to what records are to be created/collected and kept by B/Ds, and who to create/collect records, amongst others. These business rules, which incorporate records creation/collection as part of business routines and hence minimise the risk of inadequate creation/collection of records, should be established, documented and promulgated in a way that are readily accessible to all staff to facilitate their compliance in their daily work. B/Ds should make reference to the procedures and samples in the "Guidelines on Creation and Collection of Records (GCCR)"[7] to establish their own business rules.

13.   As a general rule, B/Ds 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 works which may make systematic assessment difficult or impracticable, B/Ds should provide examples or generic business rules to their staff on what records should be created/collected with reference to paragraph 10 of GCCR. In case where establishment of business rules for individual business functions/activities is considered not necessary, e.g. manuals/guidelines on operation are already in place and cover the requirement of records creation/collection, B/Ds should conduct self-assessment for the relevant business functions/activities by using the assessment form at Appendix II to GCCR with suitable adaptations to ensure complete, reliable and adequate records are created and collected to serve as evidence of business. To cope with changing circumstances, B/Ds should also **review their business rules regularly and at least once every two years, which should be documented for record purposes. The business rules should be re-circulated to all staff concerned at least once every six months.**

Keeping of Electronic Message Records

14.   ERKS is designed to meet records management requirements in an

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unstructured computing environment[8].   The use of an ERKS for the management of records has been put in place in some B/Ds.   To enhance efficiency in preserving and managing government records, the Government has committed in the Policy Address Supplement published in October 2019 that all B/Ds should have rolled-out the use of ERKS by end-2025.   **Once implemented**, **B/Ds should capture the electronic message records[9] directly to an ERKS.   Unless agreed by GRS to dispense with the "print-and-file" practice after satisfying certain circumstances[10], all electronic message records should also be "printed-and-filed" within the time-frame as specified at paragraph 11 above**, i.e. subject officers should arrange to print an electronic message record directly from the software [11] creating that message for filing in an appropriate paper-based recordkeeping system.   B/Ds should make reference to the "Guideline on the Management of Electronic Messages"[12] for more guidance on managing e-mails and other forms of electronic message records, including records on the social media platforms[13].

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[8]   An unstructured computing environment refers to situations where (a) business processes and workflow are not well-defined; (b) the user has relative autonomy over what information is created, sent and stored (e.g. e-mail and attachments); and (c) accountability for recordkeeping has not been well defined.

[9]   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).

[10]   B/Ds which have implemented an ERKS should conduct a compliance assessment in accordance with the "Manual on Evaluation of an Electronic Recordkeeping System" and seek GRS' agreement to dispense with the print-and-file practice.   The Manual is accessible at http://grs.host.ccgo.hksarg/cgp_guidelines.html or https://www.grs.gov.hk/en/hksar_government_administrative_guidelines_on_record_management.html.

[11]   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.

[12]   The "Guideline on the Management of Electronic Messages" is accessible at http://grs.host.ccgo.hksarg/cgp_guidelines.html or https://www.grs.gov.hk/en/hksar_government_administrative_guidelines_on_record_management.html.

[13]   In deciding whether a social media content should be regarded as a record, B/Ds should refer to the "Guideline on the Management of Social Media Records" (i.e. Chapter 10 of the "Guideline on the Management of Electronic Messages" which is accessible at http://grs.host.ccgo.hksarg/cgp_guidelines.html or https://www.grs.gov.hk/en/hksar_government_administrative_guidelines_on_record_management.html).

Records Classification

Establishment of New Records Classification Schemes

15.   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[14].   An effective records classification scheme is conducive to effective records management.   As a requirement to ensure quality, **new records classification scheme(s) for a B/D** such as those necessitated by re-organisation, or **amendment(s) to the existing classification scheme(s)** such as addition of new records series, **should 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 guidelines on records classification contained in Chapter 4 of GRS' Records Management Publication No. 2 "Managing Active Records: File Management"[15].

Classification Scheme for Administrative Records

16.   GRS has promulgated a standard classification scheme for administrative records [16], which provides standard primary subject terms on administrative activities to help B/Ds achieve a higher efficiency and accuracy in organising common administrative records and in disposing of such records.   The standard classification scheme and the standard records retention and disposal schedules (disposal schedules)[17] for administrative records are detailed respectively in GRS' Records Management Publication No. 3 "Subject Filing"[18] and Publication No. 4 "General Administrative Records Disposal Schedules (GARDS)"[19].

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[14]   A records classification scheme 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.

[15]   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.

[16]   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.

[17]   Disposal schedules are systematic listings or descriptions of records which indicate the arrangements to be made for their custody, retention and final disposition. Please see paragraphs 24-27 for more details on disposal schedules.

[18]   GRS' Records Management Publication No. 3 "Subject Filing" is accessible at https://grs.host.ccgo.hksarg/cgp_publications.html or https://www.grs.gov.hk/en/hksar_government_administrative_guidelines_on_record_management.html.

[19]   GARDS is accessible at https://grs.host.ccgo.hksarg/cgp_publications.html or https://www.grs.gov.hk/en/hksar_government_administrative_guidelines_on_record_management.html.

17.	B/Ds should **adopt the standard classification scheme for all their administrative records**.	While B/Ds may add secondary, tertiary and other lower level terms under the primary terms to suit their circumstances, they should seek GRS' prior agreement for addition of a new primary subject term to the standard classification scheme, so that timely action can be taken to establish a corresponding disposal schedule.

Classification Scheme for Programme Records

18.	For programme records[20], B/Ds should make reference to the procedures set out in GRS' Records Management Publication No. 3 "Subject Filing" to develop its own classification scheme for these records.

Review of Records Classification Schemes

19.	A records classification scheme allows modifications such as addition of new records series to cater for changing circumstances.	As a general principle, B/Ds should review the records classification scheme whenever necessary, such as changes to organisation, responsibilities and functions, business requirements, etc., to ensure that each scheme remains effective to cope with changes over time.	In any event, B/Ds are required to **review the records classification schemes at least once every five years**.	B/Ds should make reference to Checklist C of GRS' Records Management Publication No. 7 "Topical Guide cum Checklists for Proper Records Management Practices"[21] in conducting the review.	**The results of the review and any follow-up action taken should be documented for record purposes**.	In some cases, large B/Ds may need to designate staff at regional or 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 reviews.

Records Inventory

20.	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, B/Ds should **prepare and maintain an updated and**

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[20] 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.

[21] GRS' Records Management Publication No. 7 "Topical Guide cum Checklists for Proper Records Management Practices" is accessible at http://grs.host.ccgo.hksarg/cgp_publications.html or https://www.grs.gov.hk/en/hksar_government_administrative_guidelines_on_record_management.html.

accurate inventory of records.   To strengthen the management and disposal arrangement of records, information about the relevant disposal schedules should also be included in the records inventory at the time when the files for paper records / electronic folders or parts in the ERKS are opened[22].   As such, with immediate effect, 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: GARDS Subject Group No. and Nature/Description (e.g. GARDS 5-95 (Routine)); or
  (ii) for programme records: Disposal Authority 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).

21. For records maintained in a structured business system and not managed in an electronic recordkeeping system, 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: Disposal Authority No. and Disposal Class; and
 (e) disposal arrangements (including the inactive criterion, retention period and disposal action such as transfer to GRS or destruction).

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[22] For new series of programme records where disposal schedules are being established, information about the relevant disposal schedules should be included in the records inventory within two weeks after the disposal schedules are approved.   See also paragraph 26.

22.   As regards those paper files / folders or parts in ERKS opened <u>before</u> the date of this Circular, B/Ds should endeavor to add the information as mentioned in paragraphs 20(g) and 20(h) above in the relevant records inventories.

Records Disposal

23. Records disposal refers to the process by which time-expired records are –

(a)   transferred to GRS for appraisal and/or permanently retained in GRS 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 approved disposal schedules for programme records.

Records may be retained permanently in B/Ds 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[23].

Establishment of Disposal Schedules for Programme Records

24.   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 centre for intermediate storage; transfer of archival records to the Public Records Office (PRO) of GRS for permanent retention; or destruction of unwanted records.

25.   To dispose of administrative records, B/Ds should adopt the set of disposal schedules developed by GRS and as detailed in GARDS.   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, etc.) having regard to the administrative, operational, fiscal and legal requirements and archival value of the records[24].

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[23]   Records permanently retained in B/Ds should be stored in an 24-hour air-conditioned and dust free environment with stable and controlled temperature and humidity.   The above requirements may not currently be met by all government records storage facilities due to various constraints.   Heads of B/Ds should, however, note these requirements and include them in newly furnished or constructed records storage facilities.   GRS may inspect such facilities and records to ensure the records with permanent value are properly preserved.

[24]   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.   Publication No. 1 is accessible at http://grs.host.ccgo.hksarg/cgp_publications.html or https://www.grs.gov.hk/en/hksar_government_administrative_guidelines_on_record_management.html

26.   B/Ds should **ensure that all programme records are covered by approved disposal schedules**.   **Whenever new series of programme records are created, B/Ds should prepare draft disposal schedules or amend the existing disposal schedules, 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.   These draft disposal schedules should be endorsed by an officer not below the rank of Senior Executive Officer or equivalent.   For programme records common to different regional or district offices of a B/D, 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 B/D.

27.   GRS will consider the draft disposal schedules and discuss with the B/D concerned regarding the proposed retention and disposal arrangements, e.g. retention period and disposal action, with a view to finalising the disposal schedules.   In the process, the Archivist-grade officers of PRO will undertake records appraisal to assess their archival value to determine what records will be kept permanently in GRS as archival records and what records can be destroyed. B/Ds may be requested to provide supplementary information, such as records inventory and record samples to PRO in the process.   Finalised disposal schedules should be confirmed by an officer not below the rank of Senior Executive Officer or equivalent in the B/D concerned.   As a general principle, B/Ds should review disposal schedules whenever necessary, such as changes to organisation, responsibilities and functions, legislation, business requirements, etc., to ensure the disposal schedules remain updated.   In any event, B/Ds should **review the approved disposal schedules at least once every five years** to assist timely disposal of unwanted records, **which should be documented for record purposes**.

Disposal of Time-expired Records

28.   Regular disposal of records facilitates easy retrieval of records in active use, and minimises 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 GARDS for administrative records or the approved disposal schedules for programme records, and are ready for disposal)[25].   B/Ds should **dispose of time-expired records at least once**

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[25]   When applying the retention and disposal requirements of approved disposal schedules to programme records, B/Ds should examine whether records of different retention and disposal requirements have been mingled together or whether administrative records have been mixed with programme records in the same paper file / part in electronic recordkeeping system.   If either situation occurs, B/Ds should adopt the principles set out in paragraphs 3.4.5 to 3.4.6 of GRS' Records Management Publication No. 1 "A Practical Guide to Records Scheduling And Disposal" to determine the retention periods and disposal actions of the records.

every two years, including all their administrative records which are covered by GARDS, and all their programme records with approved disposal schedules. In the interest of proper internal control, disposal of records, including destruction of records, should be **endorsed in writing by an officer not below the rank of Senior Executive Officer or equivalent** in the B/D. Details of the records disposal process in respect of administrative records and programme records are available in Chapters 3 and 4 of GRS' Records Management Publication No. 1 "A Practical Guide To Records Scheduling And Disposal"[26].

29.   After obtaining internal endorsement to dispose of time-expired records, B/Ds should submit disposal requests to GRS in accordance with GARDS and the approved disposal schedules. Some records may contain information having archival value (as appraised by PRO and/or specified in approved disposal schedules) which forms part of the documentary heritage of the community. To confirm only records with archival value are accepted and preserved, PRO will require supplementary information, such as records inventory and record samples, from transferring B/Ds for screening and verifying the records pending transfer as archival records or conducting appraisal of those requiring further review.

30.   While B/Ds review time-expired records ready for disposal, they may identify records containing information which relates to significant events, places or personalities, etc.[27] For such cases, B/Ds should separately submit these records for PRO's appraisal of their archival value, regardless of the disposal action in the GARDS or the approved disposal schedules, so as to ensure records with archival value are preserved. B/Ds can consult GRS prior to submitting such disposal requests.

Transfer of Records Having Archival Value to GRS

31.   B/Ds should **transfer** only **their records having archival value to PRO according to the respective disposal schedules within two years after they have become time-expired**. Upon confirmation of acceptance of transfer by PRO, the records will be accepted as archival records and, subject to exemptions, made available for public access when they have been closed for 30 years. While unclassified archival records transferred to PRO should be opened for public access automatically when reaching 30 years old, counting from the date of the last entry,

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[26] GRS' Records Management Publication No. 1 "A Practical Guide To Records Scheduling And Disposal" is accessible at http://grs.host.ccgo.hksarg/cgp_publications.html or https://www.grs.gov.hk/en/hksar_government_administrative_guidelines_on_record_management.html

[27] Records containing any of the following information should be referred to PRO for records appraisal regardless of the disposal action in the disposal schedules:
  (a) records about individuals, organisations, issues or events which are widely reported by media or attract public attention;
  (b) records that document the beginning of a major trend, and the significant change in policies, decisions, legislation and actions, particularly those that set precedents; or
  (c) records that contain unique information about significant individuals, organisations, issues or events.

the transferring B/Ds 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 B/D concerned has informed PRO the otherwise.

Deferrals of Transfer of Records to GRS

32.   Deferrals of transfer of time-expired records having archival value or potential archival value to PRO for retention or appraisal are highly undesirable and should be approved only when they are absolutely necessary, such as due to on-going legal proceedings.   B/Ds should refrain from seeking deferrals for more than two years and, where it is absolutely necessary to consider such deferrals due to operational need, should **obtain the written agreement of a directorate officer in the concerned B/D at the level of deputy secretary/deputy head of department and consult GRS in advance**.

Prior Consent before Destruction of Records

33.   Upon obtaining B/Ds' internal endorsement for destruction of records as set out at paragraph 28 above, B/Ds **must then 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.   Random checking might be conducted by GRS where necessary to ensure that records with archival value are not destroyed regardless of the disposal actions stipulated in GARDS for administrative records and in the approved disposal schedules for programme records.

34.   To minimise the risk of inadvertent unauthorised destruction of records during the disposal process, B/Ds should **designate an officer not below the rank of Executive Officer II or equivalent**[28] **to ensure that the disposal process is properly supervised** and the records disposal procedures as set out in Chapter 6 of GRS' Records Management Publication No. 1 "A Practical Guide To Records Scheduling And Disposal" are complied with.

Transferring Government Records to Non-government Bodies

35.   In case a B/D needs to transfer its records to non-government bodies due to such reasons as corporatisation, privatisation or outsourcing, the DRM should seek prior agreement from GRS Director so that appropriate arrangements can be made, in particular for records having archival value.   B/Ds should make reference to paragraph 3.8 of GRS' Records Management Publication No. 1 "A

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[28]   An officer not below the rank of Executive Officer II or equivalent should be an officer whose rank's maximum pay point is not lower than MPS Point 27 or equivalent.

Practical Guide To Records Scheduling And Disposal" for the detailed requirements. **No government records should be transferred outside the Government unless with the prior agreement of the GRS Director**.

Custody and Storage of Records

Arrangement for Safekeeping

36.   B/Ds 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.   At present, majority of government records are still 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.   For proper preservation of electronic records, B/Ds should make reference to "A Handbook on Preservation of Electronic Records"[29].

Bulk Relocation of Records

37.   To minimise the risk of losing records during **bulk relocation of records**, appropriate arrangements 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.   B/Ds should make reference to the "Guidelines on Bulk Relocation of Government Records"[30] for the necessary procedures.

Investigation of Loss or Unauthorised Destruction of Records

38.   **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).   Upon receipt of such report, the DRM should –

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[29]   "A Handbook on Preservation of Electronic Records" is accessible at
https://grs.host.ccgo.hksarg/cgp_guidelines.html or
https://www.grs.gov.hk/en/hksar_government_administrative_guidelines_on_record_management.html

[30]   The "Guidelines on Bulk Relocation of Government Records" is accessible at
http://grs.host.ccgo.hksarg/cgp_guidelines.html or
https://www.grs.gov.hk/en/hksar_government_administrative_guidelines_on_record_management.html.

(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.

Management of Vital Records

39.   Vital records are those records containing information essential to the continued and effective operation of an organisation 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.   In this regard, B/Ds should **establish and implement a vital records protection programme**[31].   To cope with changing circumstances, B/Ds should **review the vital records protection programme at least once every two years**[32]**, which should be documented for record purposes**.

Review of Records Management Practices

40.   To assist B/Ds in assessing the effectiveness of their records management programme, identifying major records problems and setting priorities for improvements, GRS has promulgated guidelines on the scope and issues for review in General Circular No. 5/2012 "Records Management Reviews".   In the interest of continuous improvement and compliance monitoring, GRS is adopting a two-pronged approach to review B/Ds' records management practices.   It comprises self-assessment by B/Ds and departmental records management reviews conducted by GRS.   General Circular No. 5/2012 sets out the framework for the reviews. Apart from the self-assessment review exercises and departmental records management reviews centrally coordinated by GRS, B/Ds should also refer to GRS'

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[31] 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" which is accessible at http://grs.host.ccgo.hksarg/cgp_publications.html or https://www.grs.gov.hk/en/hksar_government_administrative_guidelines_on_record_management.html.

[32] Please refer to Checklist F of GRS' Records Management Publication No. 7 "Topical Guide cum Checklists for Proper Records Management Practices" which is designed for reviewing the vital records protection programme. Publication No. 7 is accessible at http://grs.host.ccgo.hksarg/cgp_publications.html or https://www.grs.gov.hk/en/hksar_government_administrative_guidelines_on_record_management.html.

Records Management Publication No. 7 "Topical Guide cum Checklists for Proper Records Management Accent Practices" in **reviewing their records management practices at least once every two years**, **which should be documented for record purposes**.

Public Access to Archival Records

41.   Access to archival records kept by GRS is managed through the Public Records (Access) Rules 1996[33].   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.

42.   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 B/D has the responsibility to assess the access status of the records concerned and inform GRS of its 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.

43.   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 B/Ds consider that the whole or a certain part of the closed archival records is not suitable for public access, B/Ds 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 B/Ds**.   GRS will take into account B/Ds' views and make a decision on whether the closed archival records can be released for public access.   B/Ds should also note that 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.

44.   Where a transferring/responsible B/D 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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[33] The Public Records (Access) Rules 1996 is accessible at
     https://www.grs.gov.hk/ws/english/engimages/publicforms/access.pdf.

Compliance and Enforcement

45.   All Government officers are obliged to observe and comply with the requirements as set out in this Circular, as well as those guidelines, working procedures and requirements as set out in their respective departmental records management policy and departmental guidelines on records management.

46.   The records management mechanism would only operate effectively and efficiently if proper sanctions are given to staff members who have violated the guidelines in this Circular, and the MRs in particular, without acceptable reasons and/or are found negligent while performing records management duties (e.g. loss or unauthorised destruction of records).   While under the current staff management mechanism in the Government, the authority of deciding whether or not to take administrative/disciplinary actions against the staff remains with the Head of B/D in which the staff members concerned are currently serving, the DRMs and Heads of B/Ds should ensure that appropriate administrative/ disciplinary actions with due consideration to the seriousness of misconduct/ negligence and damages caused are taken against the staff members concerned.

47.   In addition to the DRM, B/Ds may consider designating appropriate officer(s) to ensure the compliance of the requirements set out in this Circular, in particular the MRs.

Assistance from GRS

48.   Enquiries arising from this Circular may be addressed to the Government Records Service Director at 2195 7781 or to relevant officers covered at **Annex D**. GRS will arrange from time to time seminars/briefings to assist B/Ds in meeting the requirements set out in this Circular.

(Nicholas CT Chan)
for Director of Administration

c.c. Judiciary Administrator

The List of the Mandatory Records Management Requirements

Departmental Records Management Policy

MR 1 # Develop and establish a departmental records management policy, which should be promulgated to all staff and re-circulated to all staff at least once every six months. The policy and supplementary guidelines (if any) should be reviewed at least once every two years, which should be documented for record purposes (paragraphs 5-8 of the General Circular);

Overseeing Responsibilities

MR 2 Designate a Departmental Records Manager (DRM) in each bureau/department (B/D), and inform the Government Records Service (GRS) the name of the DRM and the replacement as soon as this takes place, and in any case no later than two weeks after the replacement (paragraphs 9-10 of the General Circular);

MR 3 # In case the DRM is not a directorate officer, appoint a directorate officer as the overseeing officer to make sure that the subject would receive due attention from the senior management of a B/D (paragraph 9 of the General Circular);

Creation of Records

MR 4 # Capture records in a departmental recordkeeping system (e.g. paper-based recordkeeping system or electronic recordkeeping system (ERKS)) within 30 days upon creation/receipt under normal circumstances. Under exceptional circumstances, records could be captured within three months (paragraph 11 of the General Circular);

MR 5 # Develop business rules for records creation/collection for compliance by all staff, and re-circulate to all staff concerned at least once every six months. The business rules should be reviewed at least once every two years, which should be documented for record purposes (paragraphs 12-13 of the General Circular);

MR 6 Capture the electronic message records 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" within the time-frame prescribed in point (4) above (paragraph 14 of the General Circular);

Records Classification and Inventory

MR 7   Ensure that any new records classification scheme(s) or amendment(s) to the existing classification scheme(s) such as addition of new records series is approved by the DRM (paragraph 15 of the General Circular);

MR 8   Adopt the standard classification scheme designed by GRS for all administrative records (paragraph 17 of the General Circular);

MR 9   Review records classification schemes at least once every five years, which should be documented for records purposes (paragraph 19 of the General Circular);

MR 10   Prepare and maintain an updated and accurate records inventory (paragraph 20 of the General Circular);

Records Scheduling and Disposal

MR 11   Ensure that all programme records are covered by established disposal schedules. Whenever new series of programme records are created, prepare draft disposal schedules or amend the existing disposal schedules, and forward them to GRS as soon as possible, and in any event no later than two years after the records are created (paragraph 26 of the General Circular);

MR 12 [#] Review approved disposal schedules at least once every five years, which should be documented for record purposes (paragraph 27 of the General Circular);

MR 13   Dispose of time-expired records at least once every two years, which should first be endorsed in writing by an officer not below the rank of Senior Executive Officer or equivalent, followed by obtaining prior agreement of the GRS Director before any government records are actually destroyed (paragraph 28 and 33 of the General Circular);

MR 14   Transfer records having archival value to Public Records Office (PRO) according to the respective disposal schedules within two years after they have become time-expired (paragraph 31 of the General Circular);

MR 15   Obtain the written agreement of a directorate officer in the B/D at the level of deputy secretary/deputy head of department and consult GRS in advance in case deferrals of transfer of records with archival value or

potential archival value to GRS are absolutely necessary (paragraph 32 of the General Circular);

MR 16   Ensure that the records disposal process is properly supervised by an officer not below the rank of Executive Officer II or equivalent (paragraph 34 of the General Circular);

Transfer of Records to Non-government Bodies

MR 17   Obtain prior agreement of the GRS Director before transferring government records to non-government bodies (paragraph 35 of the General Circular);

Records Custody and Bulk Relocation of Records

MR 18   Put in place appropriate arrangements to ensure the safe custody of records (paragraph 36 of the General Circular);

MR 19   Designate an officer not below the rank of Executive Officer II or equivalent to oversee bulk relocation of records and ensure appropriate arrangements during the process (paragraph 37 of the General Circular);

Loss and Unauthorised Destruction of Records

MR 20   Report any loss or unauthorised destruction of records to the DRM and GRS within the prescribed time-frame and investigate into such cases (paragraph 38 of the General Circular);

Protection of Vital Records

MR 21   Establish and implement a vital records protection programme and review the programme at least once every two years, which should be documented for record purposes (paragraph 39 of the General Circular);

Records Management Reviews

MR 22   Review records management practices at least once every two years, which should be documented for record purposes (paragraph 40 of the General Circular);

Public Access to Archival Records

MR 23 [#]   Decision on refusal to disclose all or part of a closed archival record should be made at the directorate level within the B/Ds (paragraph 43 of the General Circular); and

MR 24 [#] Review the access status of the closed parts of classified archival records every five years or less until they are eventually open for public access (paragraph 44 of the General Circular).

[#] *New mandatory requirements on records management*

Schedules for Conducting and Reviewing Records Management Functions

Records Management Functions	Schedules	Endorsed and/or Approved by
Report any loss or unauthorised destruction of records to the Departmental Records Manager (DRM) and GRS (MR 20)	Immediately (i.e. within two weeks upon the discovery of the cases)	N/A
Inform GRS of any replacement of the DRM (MR 2)	No later than two weeks after the replacement	N/A
Capture records in the departmental recordkeeping system (MR 4)	Within 30 days under normal circumstances and within three months under exceptional circumstances	N/A
Forward draft records retention and disposal schedules (disposal schedules) or amended disposal schedules for new series of programme records to GRS (MR 11)	As soon as possible, and in any event no later than two years after the records are created	Officers not below the rank of Senior Executive Officer (SEO) or equivalent
Transfer records having archival value to GRS (MR 14)	Within two years after the records have become time-expired	N/A
Re-circulate the departmental records management policy (MR 1)	Once every six months	N/A
Re-circulate business rules (MR 5)		N/A

Records Management Functions	Schedules	Endorsed and/or Approved by
Review the departmental records management policy and supplementary guidelines (if any) (MR 1)	Once every two years	The directorate officer overseeing records management, or the endorsing officer of the departmental records management policy, as appropriate
Review business rules (MR 5)		Officers not below the rank of SEO or equivalent
Review vital records protection programme (MR 21)		Officers not below the rank of Chief Executive Officer (CEO) or equivalent
Review records management practices (MR 22)		Suitable officers designated in the B/D (suggested to be an officer not below the rank of Executive Officer II (EOII) or equivalent)
Dispose of time-expired records (MR 13)		Endorsed by officers not below the rank of SEO or equivalent, and approved by GRS Director
Review records classification schemes (MR 9)	Once every five years	DRM or designated officers not below the rank of SEO or equivalent
Review approved disposal schedules (MR 12)		Officers not below the rank of SEO or equivalent
Review access status of the closed parts of classified archival records (MR 24)		Directorate officers designated in the B/D

<div align="right">**Annex C**</div>

Major Duties of Departmental Records Manager

(a) Assist the head of bureau/department (B/D) in establishing and maintaining the departmental records management policy;

(b) Establish, implement and document departmental records management practices and procedures according to the guidelines and instructions of the Government Records Service (GRS);

(c) 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;

(d) 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;

(e) Appoint Assistant Departmental Records Manager(s), where necessary, to monitor records management routines;

(f) Introduce the use of technology in a cost-beneficial manner to any aspect of the records management function that improves operation of the organisation and helps achieve the records management policy of the Government;

(g) Use GRS' records centre to store, service and dispose of inactive records when necessary (subject to the availability of storage space in the records centre);

(h) Coordinate with regional and district offices to develop consistent disposal arrangements documented in the disposal schedules;

(i) Facilitate records appraisal and records access review conducted by the Public Records Office (PRO) of GRS and ensure prompt and systematic transfer of archival records to the PRO for preservation;

(j) Identify and protect vital records so as to ensure their availability in the event of any emergency or disaster;

(k) Foster co-operation between records management personnel and other staff to facilitate the most effective management of departmental records;

(l)   Co-operate with GRS in evaluating and improving the effectiveness of the records management programme on a regular basis;

(m)   Approve new / amended records classification schemes and review records classification schemes every five years;

(n)   Conduct review of the access status of classified archival records pending for opening for public access;

(o)   Conduct investigation into cases involving loss or unauthorised destruction of records, take appropriate follow-up action, and report findings to GRS; and

(p)   Consult GRS when records management advice is required.

Annex D

Records Management Services provided by Government Records Service

Service	Responsible Officer	Tel. No.
Records management advice and training	Chief Executive Officer (Records Management and Administration)	2195 7818
	Senior Executive Officer (Records Management) 1	2195 7789
Records disposal and records centre	Senior Executive Officer (Records Management) 2	2460 3760
Records appraisal and transfer	Archivist (Public Records) 1	2195 7782
	Senior Assistant Archivist (Public Records) 3	2195 7735
Review and Access to archival records	Archivist (Public Records) 2	2195 7763
Government Microfilm Centre	Curator (Preservation Service)	2195 7808
Electronic records management	Chief Executive Officer (Record Systems Development)	3468 6019
	Senior Executive Officer (Record Systems Development)1	3468 6385