

6 August 2025

General Circular No. 2/2025

Records Management Reviews

(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 the enhanced records management review framework in the Government. This Circular supersedes General Circular (GC) No. 5/2012 of 5 October 2012.

Records Management Review Framework

2. It is the Government's policy for bureaux/departments (B/Ds) to establish a comprehensive records management programme for proper management of government records. The Government Records Service (GRS) is the central records management and service agency of the Government which develops the framework, standards and guidelines on records management, and B/Ds are primarily responsible for establishing their records management programmes under the framework.

3. Since 2012, a two-pronged review approach has been adopted to achieve and deliver the policy objective of proper records management in the Government. This approach comprises two components -

- (a) regular self-assessment conducted by B/Ds (through completion of a survey form about once every three years); and
- (b) departmental records management reviews (DRMRs) for selected B/Ds conducted by GRS.

4. The two-pronged approach has been useful in facilitating B/Ds to self-assess their compliances with the mandatory records management requirements¹ (MRs) and adoption of records management good practices² (referred as “good practices” here below), and to timely implement improvement/remedial measures upon early detection of such needs if any as well as taking preventive measures to plug potential loopholes. The DRMRs conducted by GRS further fosters proper and effective records management among B/Ds concerned. With the benefits attained from such approach and in light of the experiences gained over the years, the two-pronged approach has been enhanced to further facilitate B/Ds in implementing records management programme that works effectively under their purview. More details of the enhanced arrangement are set out below.

Enhancement in Self-assessment

5. Regular self-assessment is a useful and critical tool to help B/Ds take stock of their overall performances in complying with MRs and take timely remedial actions to rectify non-compliances as well as preventive actions. It also facilitates B/Ds to review the scope of implementing good practices which they are encouraged to adopt.

6. In this respect, arrangements have been enhanced to enable B/Ds to adopt a more effective and focused approach for the self-assessments with key features as follows -

- (a) to enable B/Ds to timely monitor **compliances with the MRs** and follow-up on any need for remedial/preventive actions as appropriate, while B/Ds’ self-assessment will still be conducted once every three years, B/Ds are required to report on the MR compliance situation to GRS in respect of a period of **six months** as prescribed by GRS during each round of exercise. The reporting should cover, inter alia, **the total number of survey forms** issued to its branches / divisions / offices as appropriate, and the **breakdown of responses** received from respective offices for applicable questions to

¹ Details of the mandatory requirements on records management are set out in General Circular No. 3/2024 or its updated version.

² Records management good practices are promulgated in relevant Administration Wing Circulars Memoranda, Guidelines and Publications including the Records Management Manual. Relevant publications are uploaded on GRS’ website: https://grs.host.ccgo.hksarg/cgp_intro.html.

reflect the situation on compliance vis-a-vis non-compliance of MRs more accurately (i.e. Compulsory Part of survey form);

- (b) for non-compliance with any MRs, B/Ds should **report the remedial actions taken / will be taken** in the survey form; and
- (c) the adoption of good practices will be separately grouped under the Extended Part of the survey and completion of the Extended Part is optional.

7. Under this enhanced arrangement, Departmental Records Managers (DRMs) have the responsibility to -

- (a) distribute the survey form for completion by their branches / divisions / offices, as appropriate;
- (b) collect the completed forms and collate a departmental return to assess the compliance situation on each MR in the B/D. As a general rule, if the percentage of non-compliance is 3% or more and if the performance of any office is unsatisfactory, DRM³ should examine the reasons behind the unsatisfactory compliance rate and/or performance and take appropriate remedial / improvement measures, which should be recorded in the remarks column in respect of the MR concerned of the departmental return; and
- (c) submit a copy of the completed departmental return to GRS on or before the deadline for each exercise.

Enhancement in Departmental Records Management Reviews

8. To foster an effective records management among B/Ds, GRS will carry out an enhanced DRMRs with a view to (a) focusing on B/Ds' compliance with MRs, particularly targeting B/Ds which fall short of complying with MRs; and (b) verifying the results of self-assessments submitted by selected B/Ds by collecting from B/Ds concerned facts and data on the departmental records management programme through various means and tools, which may include but are not limited to the review of documentations on records management, examination of

³ In case the DRM is not a directorate officer, DRM should submit the departmental return to the directorate officer overseeing records management for endorsement.

recordkeeping systems, surveys and visits, interviews and focus group discussions.

9. Details of the enhanced DRMRs are set out below.

Selection of B/Ds

10. B/Ds will be selected for DRMR each year based on the following criteria -

- (a) relevant record management information available to GRS, including compliance situation as reported in the self-assessment survey; and
- (b) random selection.

Preparation and Proceedings of the On-site Inspection

11. Each DRMR will involve the following major steps -
 - (a) GRS will take account of the compliance performance in the self-assessments conducted by B/Ds and draw up a list of B/Ds selected to go through DRMRs on a rolling basis. GRS will inform concerned B/Ds as early as possible;
 - (b) selected B/Ds should provide the required basic information to GRS prior to the commencement of GRS' on-site inspection. GRS will spell out in details the required basic information in a separate note to B/Ds concerned;
 - (c) the on-site inspection will mainly focus on factors and operation which have direct impact on the compliance of MRs and, if appropriate, the effective implementation of good practices;
 - (d) GRS will prepare a brief report summarising its observations, which will be forwarded to B/Ds concerned for follow-up actions; and
 - (e) B/Ds concerned are required to draw up an implementation plan on GRS' recommendations. GRS will provide specific advice and closely monitor the implementation progress. Such review findings and recommendations as well as the

implementation plan to be adopted by B/Ds concerned would be submitted to the Chief Secretary for Administration for any further steer, as needed.

Review Findings

12. GRS will prepare an annual summary on the general observations (including common pitfalls and exemplary practices) obtained from DRMRs conducted in the year which will be issued to all B/Ds for reference.

Implementation

13. This Circular takes immediate effect on the date of its issuance. An updated self-assessment survey form will be sent to B/Ds for conducting the self-assessment exercise. An e-fillable survey form is devised to facilitate B/Ds in consolidation of survey results collected from individual offices.

14. Survey results of the self-assessments including remedial actions for non-compliance with MRs should be endorsed by an officer pitched at the directorate level of the respective B/Ds overseeing the departmental administration or records management.

Enquiries

15. Enquiries arising from this Circular may be addressed to Chief Executive Officer (Records Management and Administration) at 2195 7818 or Senior Executive Officer (Records Management Review) at 2195 7733.



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for Director of Administration

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