

Guidelines on Creation and Collection of Records

Purpose

Chapter 3 of the Records Management Manual (accessible at http://grs.host.ccg.hksarg/doc/RM_Manual.pdf) sets out the good practices on creation and collection of records¹ and provides some examples of what records should be created and kept. This document provides further guidelines to facilitate bureaux and departments (B/Ds) to adopt the relevant good practices.

Principles governing creation and collection of records

2. 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.
3. The creation/collection of records should be adequate but not excessive.

Characteristics of a reliable and complete record

4. In order to serve as evidence, a record should be reliable which means that the contents of the record can be trusted as a full and accurate representation of the government functions, policies, procedures, decisions and transactions it documents and the record can be depended upon in the course of business.
5. A reliable record should be complete and must possess the following three elements –
 - (a) *Content* – this refers to the information or ideas the record contains;

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.

- (b) *Context* – this refers to the information about the circumstances in which the record is created, transmitted, maintained and used (e.g. who created it, when, to whom it was sent, why); and
- (c) *Structure* – this means the physical and logical format of the record, and the way parts of the record relate to each other (e.g. the structure of an e-mail record covers its header, body, attachments and corresponding reply).

6. A reliable and complete record will support B/Ds' staff to take appropriate actions, in the context of their responsibilities, to –

- (a) carry out B/Ds' business;
- (b) facilitate an audit or examination of the business for accountability;
- (c) protect the legal and other rights of B/Ds, their clients and other stakeholders; and
- (d) provide authenticity of the records so that the evidence derived from them is shown to be credible and authoritative.

7. To facilitate access, use and preservation, records should be created or kept in the most suitable medium and format. For example, prior to the implementation of an Electronic Recordkeeping System in a B/D, its e-mail records should be printed and filed in a paper-based recordkeeping system.

Developing business rules for records creation and collection

8. As a systematic approach to records creation/collection, B/Ds should develop business rules to document decisions as to what records are to be kept by B/Ds. These business rules, which incorporate records creation/collection as part of business routines and hence minimize the risk of inadequate creation/collection of records, should be established, documented and promulgated in a way that can be used by staff in their daily work. The business rules should give clear instructions to staff on the following aspects –

- (a) what records to be created or collected;
- (b) who to create or collect records;
- (c) when to create or collect records; and
- (d) where to keep records.

What records to be created/collected

9. B/Ds should determine what records they need having regard to the principles set out in paragraphs 2-3 above. The key considerations should include the following –

- (a) the legislative and regulatory environment in which they operate, including some generally applicable legislation or regulations, e.g. Evidence Ordinance (Cap. 8), Electronic Transactions Ordinance (Cap. 553), Personal Data (Privacy) Ordinance (Cap. 486), Civil Service Regulations, Standing Accounting Instructions, Accounting Circulars, General Circulars (such as General Circular No. 2/2009 entitled “Mandatory Records Management Requirements”) and specific legislation and regulations applying to individual B/Ds;
- (b) the need to refer to authoritative information about past actions and decisions for operational, policy, legal and financial purposes;
- (c) the need to protect the legal and other rights of B/Ds, their clients and other stakeholders; and
- (d) the need to explain, and if necessary justify, past actions in the event of an inquiry, audit or other investigations.

10. Having considered the above, B/Ds should identify clearly their business functions and assess their information needs so as to create/collect adequate but not excessive records. The following are general examples of what records should be created/collected –

- (a) inward and outward communication with external persons and bodies directly relating to the functions and activities of an organization;
- (b) minutes and other records of meetings, consultations and deliberations pertinent to the decision-making process, formulation of policies and procedures or transaction of business;
- (c) major oral decisions and commitments;
- (d) individual exercise of a discretionary judgement which has a major effect on the functions and activities of the organization;
- (e) departmental/government forms, registers and information (in electronic/non-electronic forms) which document business transactions/procedures; and
- (f) draft documents (e.g. amendments to minutes of meetings) which form part of a complete documentation of the relevant issue, as appropriate.

11. The business rules should be detailed enough for staff to have a clear and consistent understanding of what government functions, policies, procedures, decisions and transactions should be documented in the records. These rules are particularly important for business processes/transactions involving creation or collection of large amount of information as records. However, they should not be unduly long and complicated that they are being ignored by staff. Though personal judgement will inevitably be involved because each staff member has to decide what records to be created or collected, e.g. whether a telephone call was significant enough to be documented as a record, supervisors should be consulted in case of doubt.

Who to create/collect records

12. B/Ds should clearly specify their staff's roles and responsibilities of creating/collecting records so that records are created/collected routinely by staff. For example, in each business process/transaction, particularly for those involving the creation/collection of large quantity of records (e.g. processing and issuing licenses to the public), specific staff should be designated to create/collect records

as a business routine. It should be stressed that creating/collecting reliable, complete and adequate records is one of the staff's core duties and responsibilities. Performance of such duties and responsibilities should be evaluated in appraisals as appropriate.

When to create/collect records

13. Records should be created/collected to document the actions and decisions as soon as possible in order to ensure that the reliability and completeness of records will not be adversely affected due to passage of time. For example, records should be created/collected immediately after completion of a business process/transaction and minutes of meeting should be written after the meeting as soon as possible to avoid missing of important details.

Where to keep records

14. Records are B/Ds' valuable resources. Effective records management provides for records to be available for future use by those who need to access and use them. The business rules should therefore set out that records must be kept in designated departmental recordkeeping systems² (e.g. a paper-based system or an Electronic Recordkeeping System), but not in personal systems (e.g. the subject officer's personal files or e-mail inbox). A recordkeeping system also provides for records to be kept in context (e.g. organized according to a proper and systematic records classification scheme) so that their connection to other records relating to the same subject/case/event is apparent. Classified records should be managed and kept according to the provisions in the Security Regulations.

Establishment and review of business rules

15. B/Ds may adopt a co-ordinated approach to establishing business rules relating to records creation/collection, particularly for those business functions/activities common to sections or offices, and designate relevant sections or offices to establish business rules for functions/activities specific to the sections or offices according to departmental instructions and the guidelines in this document. Established business rules should be endorsed by an officer not below the rank of Senior Executive Officer or equivalent. Examples on

² A recordkeeping system is a manual or automated information system in which records are collected, organized and categorized to facilitate their retrieval, distribution, use, disposal or preservation.

assessing a business function for creating/collecting records and developing business rules to document the decisions are provided at **Appendices I(a) – (c)**.

16. B/Ds should aim to establish business rules for records creation/collection covering all their business functions/activities. However, for business functions/activities involving less structured processes, which may make systematic assessment similar to those shown in Appendix I difficult or impracticable, B/Ds may consider providing examples to their staff on what records should be created/collected with reference to those set out in paragraph 10 above.

17. B/Ds should properly document and promulgate the established business rules and relevant guidelines on records creation and collection to all staff for compliance.

18. From time to time, B/Ds should check whether their staff have properly followed the business rules to create/collect records. To cope with changing circumstances, B/Ds should conduct regular review (e.g. at least once every two years) on the departmental guidelines and business rules on records creation and collection. The review should be endorsed by an officer not below the rank of Senior Executive Officer or equivalent.

Assessment on records creation and collection

19. If for any reasons, e.g. resource constraints, a B/D considers that business rules for records creation/collection covering all its business functions/activities cannot be established by end 2015, the B/D should conduct a self assessment on records creation and collection in the interim. Such an assessment aims at –

- (a) examining whether complete, reliable and adequate records are created and collected in business processes to meet the principles mentioned in paragraphs 2 and 3 above;
- (b) identifying inadequacies on records creation/collection; and
- (c) drawing up measures to improve records creation/collection.

A form to assist B/Ds in conducting such an assessment is at **Appendix II**.

20. B/Ds may designate their sections or offices to conduct such assessments, if necessary. The assessment results should be endorsed by an officer not below the rank of Senior Executive Officer or equivalent in the relevant section or office. The completed assessment forms should be properly documented for future reference. Based on the assessment results, B/Ds should plan and implement co-ordinated departmental improvement measures.

21. Pending establishment of the business rules, B/Ds should conduct assessments regularly (e.g. at least once every two years) to ensure complete, reliable and adequate records are created and collected to serve as evidence of business.

22. 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 also conduct such assessment for the relevant business functions/activities by using the assessment form at Appendix II with suitable adaptations.

Government Records Service

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Example on Records to be Created/Collected to Document a Licensing Function

- (a) ***Assessment/analysis of the business function*** - The licensing function is first analyzed as to its components (i.e. transactions/steps) involved in the business process. Such an assessment should show that the function consists of the following six main transactions/steps in the business process where records should be created/collected –
- (i) Receive application from a member of the public;
 - (ii) Clarify with the applicant for missing information;
 - (iii) Seek instructions from supervisor for further processing the application;
 - (iv) Put up recommendation on the application to supervisor;
 - (v) Approve application by supervisor after considering the recommendation; and
 - (vi) Issue license to the applicant.
- (b) ***Considerations on the records to be created/collected*** - Taking all relevant considerations into account, it should be apparent that records should be created/collected during the business process to document that –
- (i) licences are issued according to the law concerned;
 - (ii) responsible staff follow the departmental instructions to process licence applications; and
 - (iii) licence application forms and supplementary information are properly kept.
- (c) ***Development of business rules*** - Taking (a) and (b) together, the following business rules are established to document the decisions as to creation/collection of the required records in each transaction/step of the business process –

Business rules on records creation/collection – Licensing function

Transaction/Step in the Business Process	What to create/collect	Who to create/collect	When to create/collect	Where to keep
(i) Receive application	Application form (including attachments)	Clerical Officer (General Registry) [i.e. supporting staff]	Immediately after receipt	AB GR/1 [i.e. relevant case file of the section]
(ii) Clarify with the applicant	Correspondence (e.g. letters, e-mails etc.)	Licensing Officer 1 [i.e. subject officer]	Immediately after issue/ receipt of correspondence	AB GR/1
(iii) Seek instructions from supervisor	Correspondence (e.g. file minute, e-mails etc.) Important oral instructions	Licensing Officer 1	Immediately after issue/ receipt of correspondence and instructions	AB GR/1
(iv) Put up recommendation	File minute	Licensing Officer 1	Immediately after completion of processing	AB GR/1
(v) Approve application	File minute	Senior Licensing Officer [i.e. supervisor]	Immediately after approval	AB GR/1
(vi) Issue licence to the applicant	Letter	Licensing Officer 1	Immediately after issue	AB GR/1

Note: The above sample represents a generalized and simplified example. B/Ds should develop more specific business rules to meet their needs.

**Example on Records to be Created/Collected to
Document A Procurement Function
(For direct purchase with a value not exceeding \$50,000)**

(a) *Assessment/analysis of the business function*

The work process of ABC Department set out below is applicable to direct purchase with a value not exceeding \$50,000. By analyzing the work process of the procurement activity, it is apparent that ten main transactions/steps are involved in the business process where records should be created/collected –

- (i) Identify need for stores or services by user office;
- (ii) Seek endorsement for procurement;
- (iii) Invite quotations from supplier(s);
- (iv) Receive quotation(s) from supplier(s);
- (v) Evaluate quotation(s) received and putting up recommendation for supervisor's approval;
- (vi) Endorse the procurement recommendation by the supervisor;
- (vii) Forward procurement documents to the Administration Office by user office;
- (viii) Place order by raising Departmental Order (GF 219/ GF 220) or by using purchasing card (P-card) by the Administration Office;
- (ix) Issue certified invoice by user office to the Administration Office for payment upon receipt of stores or services ordered; and
- (x) Submit the Departmental Order/ P-card fax order form and the certified invoice to the Finance Office for payment after checking by the Administration Office.

(b) Considerations on the records to be created/collected

Taking all relevant considerations into account, records should be created/collected during the business process to –

- (i) provide documentation to demonstrate the procurement is conducted in accordance with the ABC Department’s Internal Circular No. 2/2010 entitled “Procurement of Stores and Services” (Internal Circular) and relevant regulations (e.g. Stores and Procurement Regulations (SPR));
- (ii) cater for the possible need to explain, and if necessary justify, the procurement action in the event of an inquiry, audit or other investigation; and
- (iii) meet operational and financial purposes.

(c) Development of business rules

Taking (a) and (b) together, the following business rules are established to document the decisions as to creation/collection of the required records in each transaction/step of the business process of the procurement activity –

Business rules on records creation/collection –				
Procurement (For direct purchase with a value not exceeding \$50,000)				
Transaction/Step in the Business Process	What to create/collect	Who to create/collect	When to create/collect	Where to keep
(i) Identify need for stores or services by user office	Correspondence (e.g. email, verbal request)	Clerical Officer (Personnel Registry) (i.e. subject officer)	Immediately after receipt of request	ABC PR/ 3-30 (i.e. respective subject file of user office)

Transaction/Step in the Business Process	What to create/collect	Who to create/collect	When to create/collect	Where to keep
(ii) Seek endorsement for procurement from an officer not below the rank of Executive Officer II or equivalent as set out in the Internal Circular	Correspondence (e.g. minute, email)	Clerical Officer (Personnel Registry)	Immediately after issue and receipt of endorsement	ABC PR/ 3-30
(iii) Invite quotations from suppliers in accordance with SPR 260(a) & (b) for stores or SPR 280 (b) for services as appropriate	Correspondence (e.g. email, letter)	Clerical Officer (Personnel Registry)	Immediately after issue	ABC PR/ 3-30
(iv) Receive quotation(s) from supplier(s)	Correspondence (e.g. faxed document, e-mails with attachments, etc.)	Clerical Officer (Personnel Registry)	Immediately after receipt	ABC PR/ 3-30
(v) Evaluate quotation(s) received and put up recommendation for supervisor's approval in accordance with SPR 260(a) & (b) for stores or SPR 280(b) for services	File minute, GF 212	Clerical Officer (Personnel Registry)	Immediately after issue	ABC PR/ 3-30

Transaction/Step in the Business Process	What to create/collect	Who to create/collect	When to create/collect	Where to keep
(vi) Endorse the procurement recommendation by the supervisor in accordance with SPR 260(a) , (b), (h) &(i) for stores or SPR 280(b), (h) & (i) for services	File minute, endorsed GF 212	Executive Officer (Personnel Registry) [i.e. an officer not below the rank of Executive Officer II or equivalent]	Immediately after approval	ABC PR/ 3-30
(vii) Forward procurement documents to the Administration Office by user office	Memo, copy of GF 212, supervisor's approval, quotation (Note: The original GF212 will be sent to the Administration Office. For other procurement documents (e.g. quotations) already on file, making cross reference to them may also be considered)	Clerical Officer (Personnel Registry)	Immediately after issue	ABC PR/ 3-30
(viii) Place order by raising Departmental Order for Supply of Stores (GF219)/ Departmental Order for Provision of Services (GF 220) or by using purchasing card (P-card) by the Administration Office	<ul style="list-style-type: none"> • Procurement documents from the user office • GF 219/220 or P-card fax order form 	Clerical Officer (Adm) [i.e. subject officer in the Administration Office]	Immediately after issue	ABC ADM/ 4-15 (i.e. respective subject file of the Administration Office)

Transaction/Step in the Business Process	What to create/collect	Who to create/collect	When to create/collect	Where to keep
(ix) Issue certified invoice by user office to the Administration Office for payment upon receipt of stores or services ordered with reference to SPR 260 (k)	Memo, copy of certified invoice (Note: the original certified invoice will be sent to the Administration Office for payment)	Clerical Officer (Personnel Registry)	Immediately after issue	ABC PR/4-15
(x) Submit the Departmental Order /P-card fax order form and the certified invoice to the Finance Office for payment after checking by the Administration Office	Copy of the certified invoice and GF 212, GF 219/ 220/ P-card fax order form (Note: the original certified invoice and GF 212, GF 219/220/ P-card fax order form will be sent to the Finance Office for payment)	Clerical Officer (Adm)	Immediately after issue	ABC ADM/4-15

Note: The above sample represents a generalized and simplified example. B/Ds should develop more specific business rules to meet their needs.

**Example on Records to be Created/Collected to
Document A Policy Formation Process**

(a) *Assessment/analysis of the business function*

Generally speaking, the business process of policy formation involves the following ten main transactions/steps where records should be created or collected –

- (i) Identify need for formation/change of policy;
- (ii) Seek approval in principle from senior officers;
- (iii) Grant approval in principle by senior officers;
- (iv) Conduct research on the policy concerned;
- (v) Seek input/advice from stakeholders;
- (vi) Prepare draft policy for senior officers' comments;
- (vii) Provide comments on the draft policy by senior officers;
- (viii) Submit the revised draft policy for senior officers' approval;
- (ix) Approve the revised draft policy by senior officers; and
- (x) Promulgate the policy to stakeholders.

(b) *Considerations on the records to be created/collected*

Taking all relevant considerations into account, it is considered that records should be created/collected during the work process mentioned in (a) above to –

- (i) document the decisions, deliberations and information, etc. relating to formation/change of policy; and
- (ii) serve as future reference.

(c) *Development of business rules*

Taking (a) and (b) together, the following business rules are established to document the decisions as to creation/collection of the required records in each transaction/step of the work process involved in policy formation –

Business rules on records creation/collection –				
Policy Formation				
Transaction/Step in the Business Process	What to create/collect	Who to create/collect	When to create/collect	Where to keep
(i) Identify need for formation/change of policy	Correspondence/ research materials (e.g. instruction from senior officers, research findings, request by stakeholders)	Assistant Officer [i.e. subject officer]	Immediately after identification of such a need	CB/1-1 [i.e. respective subject file]
(ii) Seek approval in principle from senior officers	Correspondence (e.g. email, minute)	Assistant Officer /Chief Officer/ Principal Officer as appropriate [i.e. senior officers]	Immediately after issue/receipt	CB/1-1
(iii) Grant approval in principle by senior officers	Correspondence (e.g. email, minute)	Assistant Officer/ Chief Officer/ Principal Officer as appropriate	Immediately after issue/receipt	CB/1-1
(iv) Conduct research on the policy concerned	Correspondence/ research materials (e.g. email, letter, research reports)	Assistant Officer	Immediately after issue/receipt	CB/1-1

Transaction/Step in the Business Process	What to create/collect	Who to create/collect	When to create/collect	Where to keep
(v) Seek input/advice from stakeholders	Correspondence (e.g. email, memo)	Assistant Officer	Immediately after issue/receipt	CB/1-1
(vi) Prepare draft policy for senior officers' comments	Correspondence (e.g. minute, email, draft policy)	Assistant Officer	Immediately after issue	CB/1-1
(vii) Provide comments on the draft policy by senior officers	Correspondence (e.g. minute, email, draft policy)	Assistant Officer/ Chief Officer/ Principal Officer as appropriate	Immediately after issue/receipt	CB/1-1
(viii) Submit the revised draft policy for senior officers' approval	File minute, revised draft policy	Assistant Officer	Immediately after issue	CB/1-1
(ix) Approve the revised draft policy by senior officers	File minute	Chief Officer/ Principal Officer	Immediately after approval	CB/1-1
(x) Promulgate the policy to stakeholders	Correspondence (e.g. email, memo)	Assistant Officer	Immediately after issue	CB/1-1

Note: The above sample represents a generalized and simplified example. B/Ds should develop more specific business rules to meet their needs.

Assessment on Records Creation and Collection

(Please read the Guidelines on Creation and Collection of Records (“Guidelines”) issued by Government Records Service in July 2012 and the explanatory notes at the end of this assessment form before completing the form.)

Bureau/department: _____

Section/office: _____

Section I: Departmental guidelines on records creation/collection

(paragraphs 16-17 of the Guidelines)

1. Has your bureau/department (B/D) established and promulgated guidelines on records creation/collection covering (i) what records to be created/collected; (ii) who to create/collect records; (iii) when to create/collect records; and (iv) where to keep records for adoption by staff?

- Yes** **In part** **No** (go to Question 3 after completing “*Supporting information*” and “*Improvement Measures*”)

Supporting information: _____

Improvement measures: _____

2. Has your B/D reviewed the established guidelines regularly (e.g. at least once every two years)?

- Yes** **In part** **No**

Supporting information: _____

Improvement measures: _____

Section II: What records to be created/collected

(paragraphs 2-7 and 9-11 of the Guidelines)

3. Has your B/D determined what records have to be created and collected having regard to the principles set out in paragraphs 2-3 of the Guidelines with reference to the key considerations mentioned in paragraph 9 of the Guidelines?

Yes **In part** **No**

Supporting information: _____

Improvement measures: _____

4. Has your B/D provided guidance or examples to staff to advise or illustrate what records to be created/collected in its business processes?

Yes **In part** **No**

Supporting information: _____

Improvement measures: _____

5. Do all the records kept by your B/D possess the characteristics mentioned in paragraphs 4-5 of the Guidelines so that the records can be regarded as complete and reliable evidence of business?

Yes **In part** **No**

Supporting information: _____

Improvement measures: _____

6. Has your B/D created/collected or kept records in the most suitable medium and format, including printing and filing e-mail records in a paper-based recordkeeping system prior to the implementation of an Electronic Recordkeeping System in the B/D?

Yes **In part** **No**

Supporting information: _____

Improvement measures: _____

7. Has your B/D regularly reviewed whether records created/collected are complete, reliable and adequate to serve as evidence of business?

Yes **In part** **No**

Supporting information: _____

Improvement measures: _____

Section III: Who to create/collect records

(paragraph 12 of the Guidelines)

8. Has your B/D clearly specified its staff's roles and responsibilities of creating/collecting records, particularly for business processes involving the creation/collection of large quantity of records so that records are created/collected routinely by staff?

Yes **In part** **No**

Supporting information: _____

Improvement measures: _____

9. Has your B/Ds evaluated the performance of staff who are responsible for creating/collecting records in the appraisals?

Yes **In part** **No**

Supporting information: _____

Improvement measures: _____

Section IV: When to create/collect records

(paragraph 13 of the Guidelines)

10. Have your staff created/collected records to document the actions or decisions as soon as possible in order to ensure that the reliability and completeness of records will not be adversely affected due to passage of time?

Yes **In part** **No**

Supporting information: _____

Improvement measures: _____

Section V: Where to keep records

(paragraph 14 of the Guidelines)

11. Are your B/D's records kept in designated departmental recordkeeping system(s) (e.g. a paper-based system or an Electric Recordkeeping System), but not in personal system(s)(e.g. the subject officer's personal files or e-mail inbox)?

Yes **In part** **No**

Supporting information: _____

Improvement measures: _____

12. Do the departmental recordkeeping system(s) facilitate authorized users to access the records managed and kept by them?

Yes **In part** **No**

Supporting information: _____

Improvement measures: _____

13. Do the departmental recordkeeping system(s) facilitate records kept in context (e.g. organized according to a proper and systematic records classification scheme) so that their connection to other records relating to the same subject/case/event is apparent?

Yes **In part** **No**

Supporting information: _____

Improvement measures: _____

14. Are your B/D's classified records managed and kept according to the provisions in the Security Regulations?

Yes **In part** **No**

Supporting information: _____

Improvement measures: _____

Completed by

Name : _____

Rank and post : _____

Tel no. : _____

E-mail : _____

Supplementary remarks:

Endorsed by*

Name : _____

Rank and post : _____

Tel no. : _____

E-mail : _____

Supplementary remarks:

*The assessment form should be endorsed by an officer not below the rank of Senior Executive Officer or equivalent.

Explanatory Notes

1. Please study the Guidelines on Creation and Collection of Records carefully before completing the assessment form.
2. The assessment form is divided into the following five sections relating to different aspects of records creation and collection –
 - (a) *Section I*: departmental guidelines on records creation/collection;
 - (b) *Section II*: what records to be created/collected;
 - (c) *Section III*: who to create/collect records;
 - (d) *Section IV*: when to create/collect records; and
 - (e) *Section V*: where to keep records.
3. Each section contains a number of questions to assist B/Ds to review the relevant aspect. Each question comprises the following three parts –
 - (a) *Question*: a “Yes”, “In part” or “No” answer should be selected as appropriate;
 - (b) *Supporting information*: information should be provided to support the answer (e.g. If a “Yes” answer to Question 1 is selected, information on when the departmental guidelines were established and promulgated as well as the reference of the file keeping the guidelines should preferably be provided); and
 - (c) *Improvement measures*: measures should be proposed as appropriate to improve inadequacies identified (e.g. If a “No” or “In part” answer to Question 1 is selected, the plan on when the departmental guidelines will be established and promulgated should preferably be provided).
4. A “No” or “In part” answer indicates that inadequacies have been identified and improvement measures should be considered.