Effective Records Management

Part 4: How to comply with BS ISO 15489-1

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Information

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Foreword

All businesses, whether private or public sector, rely on information and records to conduct their affairs in a systematic and legally compliant way. The strategic management of records and information is essential to this process and never more so in an age of e-commerce and e-government. With a rapidly changing and developing business context there are considerable organizational benefits to adopting a consistent and standardized approach to the management of records and information.

In October 2001 the first international standard for the management of records, was launched in Montreal, Canada. The two-part publication of Standard and Technical Report, implemented in the United Kingdom as BS ISO 15489-1:2001 and PD ISO/TR 15489-2:2001, were the culmination of three years' work by a group of international experts to synthesize best practice from around the world in the strategic management of records. This Standard and Technical Report are applicable to multinational companies and small enterprises alike and provide an essential tool for the management of records and information.

The standard provides a framework within which the necessary management of records and information can take place. This publication is the fourth in a series of publications on records management and is intended to complement the Standard and Technical Report and help place them in context for the user. The publications expand on the framework that the standard creates and provide both interpretation and illustration of good practice. Each volume has been written predominately from the United Kingdom perspective by leading United Kingdom practitioners, who have first hand, practical experience of, and insight into, the issues facing United Kingdom organizations today.

The other books in this series are:

– BIP 0025-1:2002, *Effective records management — Part 1: A management guide to the value of BS ISO 15489-1*;

– BIP 0025-2:2002, *Effective records management — Part 2: Practical implementation of BS ISO 15489-1*;

– BIP 0025-3:2003, *Effective records management — Part 3: Performance management for BS ISO 15489-1*.

Further publications may be added in future.

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Contents

1 Introduction

1.1 Background

BS ISO 15489-1, a standard for the management of records, was originally launched by ISO in October 2001 and adopted soon after by the British Standards Institute (BSI). The standard is a best-practice standard and as such can be used to benchmark an organization's processes and procedures concerned with the management of records and information.

The standard is not a compliance standard in that it requires certain actions or prescriptions to be followed in a specific way. Records management practice is heavily intertwined with the business processes of an organization and will differ from one organization to the next even if they operate within similar domains. This does not however mean that it is not possible to be compliant with the standard; this publication seeks to lay out an approach that an organization can adopt to build a portfolio of evidence which demonstrates compliance with the principles described in this standard in ways and to the degree which are appropriate for a particular organization.

The approach taken by the authors is to deconstruct the standard in terms of its requirements, give examples of the most appropriate level of compliance and then indicate to the reader potential ways of measuring compliance. This publication uses tables to highlight the relevant clause number and criteria from the standard, gives an example of how compliance could be verified, illustrates the source of the verification (including, where appropriate, which steps from the DIRS methodology may provide a useful source of information) and finally an indication of who would likely be responsible for providing and/or managing the requirements.

For some organizations there may be an imperative from within their own business domain to demonstrate a very high level of compliance with a particular prerequisite of the standard whilst other prerequisites would require a lesser level of compliance. This publication cannot make the decision for the user on the level of compliance needed for their particular organization but rather offer a range of options which can be selected based on a business and regulatory analysis of the organization.

This approach is illustrated in the following table.

ISO	Criteria	Verification	Source	Responsibility
6.2	Define and document policy for records management	Policy statement(s) written: – senior management endorsed – authorities and responsibilities assigned – communications strategy established	Mission statement Existing policies and procedures SWOT analysis PEST analysis Analysis of regulatory environment	Records manager/ business analyst/ senior manager

In organizations subject to certain statutory and regulatory regimes, the contents of this policy may need to cover specific issues whereas in other industries there are no particular specifications affecting the contents of such policies.

The authors have also taken the opportunity where applicable to include practical information on some of the requirements outlined, based on their combined 50 years of professional knowledge. These are referred to as 'Top Tips' and appear in shaded boxes as per the example below.

TOP TIP

Good retention schedules should contain information describing the records series, how long it is to be kept, what happens at the end of retention and the legal, regulatory or operational reason for retaining the record. Avoid terms like 'best practice' or 'common practice' as they are meaningless and make it difficult for subsequent users to review schedules.

The ultimate aim is to have records management systems and processes that are fit for purpose and support the organization's mission, aims, objectives, rights and obligations. Its records will then be credible and trustworthy, able to provide a defence when required and an accurate source of information on which to base decisions for future activities.

1.2 Why is compliance with BS ISO 15489-1 important?

There are no statutory requirements for an organization, either public or private sector, to be compliant with the standard,[1] although there are many reasons why an organization may seek to be compliant:

- **Quality programmes** – many recognized quality frameworks such as ISO 9000 and the EFQM require organizations to manage their records in a best-practice way.
- **Public access legislation** – such as the Freedom of Information Act 2000, Data Protection Act 1998 and Environmental Information Regulations 2004 are

1 The 'Priority Outcomes' issued by the Office of the Deputy Prime Minister in the UK in relation to public sector e-government targets suggest that BS ISO 15489-1 would be the required methodology to implement objective G19 Electronic Document & Records Management Systems.

underpinned by good records management practice, and organizations failing to meet various codes of practice under these regimes can face penalties.

- **Regulatory requirements** – many industries are subject to stringent regulatory regimes, e.g. pharmaceutical organizations, where the authenticity and accuracy of records is paramount to meet business objectives and failure to do so has serious business consequences such as a product failing to attain the necessary licence to be traded.
- **Performance measurement** – many organizations monitor performance closely to ensure that business risks, operating costs, productivity, legal compliance and stakeholder requirements are all managed against agreed criteria. Records and information management plays a crucial part in all of this and compliance with BS ISO 15489-1 is a means to ensure this aspect of performance can be monitored.
- **Moving from an analogue to digital work environment** – many organizations are developing ECM (enterprise content management) and ERP (enterprise resource planning) strategies, each of which involves a move from an analogue (paper) work environment or a hybrid (partially paper and partially digital) environment to a predominantly digital environment. It may involve business transformation and process reengineering and it may involve redesigning the corporate IT architecture. It will certainly involve learning new techniques to manage records to meet corporate governance and statutory requirements. Organizations will find a high value in having a framework in which to manage this critical development.

1.3 Benefits of compliance

Compliance with BS ISO 15489-1 can bring a number of operational benefits to an organization, for example, it can allow an organization to do the following.

- Conduct business in an orderly, efficient and accountable manner. The preservation of accurate and authentic business records is not only a requirement of many statutes and regulations but also adds value to operational efficiency of the organization.
- Deliver services in a consistent and equitable manner through understanding what organizational transactions have been completed and how they were completed.
- Support and document policy formation and managerial decision-making, through preservation of a reliable knowledge base.
- Provide consistency, continuity and productivity in management and administration, by ensuring business evidence of all organizational activities has been captured.
- Provide continuity in the event of a disaster, by ensuring that ‘vital records’ have been identified by analysing the value and risk associated with records.
- Meet legislative and regulatory requirements through ensuring records are retained and accessible for the appropriate period of time.
- Provide protection and support in litigation including the management of risks associated with the existence of, or lack of, evidence of organizational activity.
- Protect the interests of the organization and the rights of employees, clients and present and future stakeholders.
- Support and document current and future research and development activities, developments and achievements, as well as historical research.
- Maintain corporate memory through capturing evidence of business activity in documents and including the documenting of processes.

TOP TIP

Include those benefits which address key organizational issues when producing a business case for improved records management.

1.4 Responsibilities for attaining compliance

There is clearly a need for input from the information/records specialist in ensuring compliance with BS ISO 15489-1, but this can only be one aspect in developing a compliant programme. Input will be needed from legal specialists in terms of understanding statutory and regulatory requirements and the levels of necessary compliance. Business analysts are essential to help to understand the nature of the organization and how it works. Every project needs a sponsor, usually a senior manager, to ensure that a strategic perspective is maintained. Finally, every project also needs a project manager who is given the time and resources to deliver the project.

1.5 Risk management and governance issues

Authoritative and credible records are now seen as an essential component in demonstrating good corporate governance, transparency of operations and in meeting regulatory requirements. Failure to meet these obligations can be financially punitive and seriously damage the organization's reputation. These matters are also closely related to management of risk.

1.6 Meeting governance and compliance requirements

1.6.1 Overview

The matrix below demonstrates that the degree of compliance with the standard can be linked to the regulatory environment.

	Low risk (e.g. minimal statutory/ regulatory requirement)	**High risk (e.g. high statutory/ regulatory requirement)**
Low number of business transactions	*Quadrant 1:* Be aware of requirements of BS ISO 15489-1 for best practice	*Quadrant 2:* Ability to prove compliance should be part of risk strategy
High number of business transactions	*Quadrant 3:* Benchmark with BS ISO 15489-1 for best practice	*Quadrant 4:* Ability to prove compliance with BS ISO 15489-1 should be built into risk strategies and marketed to stakeholders as a positive aspect of corporate governance

The nature of the risk and the organization's attitude toward specific risks can be used to assess the need for compliance with BS ISO 15489-1 and the actions an organization may want to take.

1.6.2 Quadrant 1 – Relaxed governance

If an organization exists in a business domain with little or no statutory or regulatory business requirements and does not complete a high number of business transactions with its customer base, then proving compliance with the standard may not have any business value. However, very few organizations do exist in such an environment and if they did, for the business to progress they would soon be situated in another quadrant. This would not negate the statutory requirements associated with keeping records.

1.6.3 Quadrant 2 – Focused governance

If an organization exists within a regulated environment, but has a relatively small number of customer transactions, it should utilize best practice from BS ISO 15489-1 and ensure robust retention schedules are developed.

1.6.4 Quadrant 3 – Reduced governance

If an organization exists in a business environment that is not heavily regulated, but carries out a large number of transactions, it will benefit from following BS ISO 15489-1 and ensuring the best practice is absorbed into the organization, but may not need to establish formal compliance.

1.6.5 Quadrant 4 – Vigorous governance

Where an organization exists in a highly regulated business environment and participates in a high level of business transactions, there is a value in demonstrating a compliance with BS ISO 15489-1 to communicate to its regulators, customers and other stakeholders a commitment to good corporate governance.

1.7 Risk assessment

Businesses face a wide variety of records-related risks in addition to those resulting from their statutory and regulatory environment. Loss of information, disruption to systems and consequent loss of access to records, perhaps as a result of a disaster, damage to reputation and other situations are very real risks in today's world. A means of analysing and assessing the impact of potential or actual risks is essential to ensure that the organization can continue to operate in an economically sustainable way. Many organizations have a risk register to demonstrate awareness and management of the unique set of risks affecting their business. Identification of risks related to records may be drawn from such a register or developed as part of the methodology proposed here for compliance.

A common way to assess risk is by means of a 'likelihood versus impact' matrix. For each records management risk identified, multiply the likelihood by the impact to arrive at a score.

	Impact:	**Low = 2**	**Medium = 4**	**High = 8**
Likelihood:	(Multiplied by)			
Low = 1		2	4	8
Medium = 2		4	8	16
High = 3		6	12	24

Score 2–6 (low risk) = monitor risk, mitigate where possible

Score 8–12 (medium risk) = remedial action needed at appropriate time to mitigate or reduce risk

Score 16–24 (high risk) = urgent action required to reduce or eliminate risk to prevent significant adverse consequences

When taken forward to the summary (Form B) this helps to identify priorities for action based on the associated risk. The actions needed to meet with BS ISO 15489-1 requirements – to the extent applicable to the organization's unique circumstances and its attitude to risk – can then be identified, prioritized and costed. Resulting projects or changes in processes may be then be assessed and scored after implementation to enable the improvements to be clearly seen.

TOP TIP

Who owns the risk? It is the business unit that is responsible for the process that produces the records that owns the risks associated with those records. Their understanding of the risks and their potential consequences may help them to work with you to reduce the risks and resolve issues.

2 How to use this publication

2.1 Introduction

This publication aims to provide help in understanding how to apply BS ISO 15489: 2001, *Information and documentation – Records Management, Part 1: General* in appropriate ways for a wide variety of organizations. The methodology takes into account the legal and regulatory environment, the business requirements and the organization's attitude towards risk, thereby enabling the business to achieve what the authors call 'contextual compliance'.

Guidance is provided in assessing the degree to which existing records management programmes, systems and processes are fit for purpose. From this accurate understanding of matters, improvements can be planned, prioritized and subsequently measured.

2.2 Self-assessment and compliance (SAC) processes

BS ISO 15489-1 provides guidance for improving an organization's records and information management practices, including the design of new systems and review of existing systems, in order to satisfy the requirements of the standard. These include:

- setting policies and standards;
- assigning responsibilities and authorities;
- establishing and promulgating procedures and guidelines;
- providing a range of services relating to the management and use of records;
- reviewing, designing or redesigning, implementing and administering specialized systems for managing records; and
- integrating records management into business systems and processes.

BS ISO 15489-1 includes the eight-step DIRS methodology (Design and Implementation of a Records System) in clause 8.4. An explanation of DIRS is included in Annex A of this publication. A fuller explanation, with worked examples, is found in PD ISO/TR 15489: 2001, *Information and documentation — Records management — Part 2: Guidelines*.[2]

It is highly appropriate to use this methodology in conjunction with this self-assessment and compliance process. The DIRS steps may be taken in order, out of order or combined if appropriate. The steps may be applied at the organizational level (i.e. strategic), the functional, activity, system, process or even transaction level. It is likely that this will be an interactive process covering the same or similar ground but from different perspectives or deeper levels of granularity. Each step or review will inform the next and a rich and accurate picture of the organization's records management requirements and its performance will be built up.[3]

The SAC may be conducted after all DIRS steps have been completed and in some ways this makes the SAC process easier, as there would be a ready source of current, relevant and accurate information available for each stage in the assessment. However, DIRS may also be used in conjunction with each SAC step as indicated in the table in the following section (see p. 9).

2.3 How to use this publication

The following table summarizes the logical set of steps that will lead to an evaluation of compliance with the standard. They are based on clauses 6–11 in BS ISO 15489-1, but are presented in an order which places design or redesign of records systems after the analysis of records management activities but before training and monitoring, since organizations may find it easier to approach matters in that sequence. However, alternative routes may be followed as circumstances and needs determine.

Following the steps will enable the business to create a prioritized and risk-assessed report of improvements or changes to meet the real needs of the organization and record systems can be implemented or improved as required.

These steps are also linked to the DIRS processes described in PD ISO/TR 15489-2, which is summarized in Annex A.

2 Clauses in the TR are mapped to the standard in TR Annex 1.

3 See *BIP 0025-2:2002, Effective records management — Part 2: Practical implementation of BS ISO 15489-1*, for further practical information on following the DIRS methodology.

Compliance step	ISO clause	DIRS step	Objectives and outcomes
1	Policy and responsibilities (clause 6)	A	Establish business needs Part, or all, of the organization is engaged in identifying and supporting a programme of work to achieve certain benefits as described in BS ISO 15489-1 Policies written, adopted, communicated and implemented
2	Records management requirements (clause 7)	A, B, C & H	Credible and authoritative records are being consistently produced
3	Records systems characteristics and functionality (clauses 8.2 and 8.3)	A to E for evaluation	Records systems identified, analysed, evaluated and prioritized for improvement on a risk basis
4	Processes and controls (clause 9)	B & C	Fitness for purpose of records processes and controls established, gap and risk analysis completed List of remedial actions needed to fully meet requirements
5	Training (clause 11)	E, G & H	Training needs identified, reviewed, evaluated and subsequently met at all levels including records management professionals where appropriate
6	Monitor and audit (clause 10)	D & H	Reports of compliance with policies and business rules
	Post SAC process	E–H	Design or redesign of systems and processes following completion of SAC process

The most important remedial actions needed to comply with the standard will have been identified as having:

- real business relevance and need;
- a wide organizational viewpoint rather than a narrow departmental perspective;
- some indications of costs prioritized;
- a risk assessment completed to demonstrate the consequences of non-compliance and whether this is acceptable to senior management; and
- projects identified and scoped and prioritized.

TOP TIP

BS ISO 15489-1, when applied intelligently, will lead to an organization keeping fewer records – but those records will be of a higher quality, and thus be more useful as evidence and as sources of information upon which to base decisions.

2.4 How to use the forms – Forms A/1 to A/7

2.4.1 Form numbering

The forms used to record assessments are numbered according to the above steps for consistency:

- A/1/ Policy and responsibility
- A/2/ Records management requirements – records characteristics
- A/3/ Records system characteristics
- A/4/ Records system functionality
- A/5/ Records management processes and controls
- A/6/ Training
- A/7/ Monitoring and auditing

Forms A/1 to A/6 can be used for collation of survey information relating to individual systems, processes, activities and functions.[4] As an example, if the records management processes and controls of an accounts payable function in a finance department were being analysed, there may be several processes in need of description, to establish the overall level of compliance for that function.

In that case the forms could be numbered as follows:

- A/2/a Authorization of payments
- A/2/b Banking transactions
- A/2/c Reconciliation of accounts
- A/2/d Management of budgets

2.4.2 Number of forms per department or function

The level to which functions, activities and business processes are deconstructed and described is entirely at the discretion of the organization, but all relevant issues should be captured. Functions which are large and complex – especially those in a high-risk environment – will require greater levels of granularity to be useful than for simpler, low risk activities (see matrix on p. 4 for further information).

The level of detail entered into each field on the form should be sufficient to give evidence of how the score was determined.

4 'Function': a common purpose that unites a set of activities which help the organization to fulfil its mission; 'activity': a group of related processes that support a function; 'process': a set of repeated actions which transform input into output; 'transaction': the smallest unit of business activity.

2.4.3 ISO reference

This refers to the specific clause in BS ISO 15489-1 most relevant to the topic under review. Other clauses may also be relevant depending on circumstances and may be added as required.

2.4.4 Requirement detail and fitness for purpose

If the DIRS methodology is followed, the products or outcomes will form the principal source of information for defining the requirements and verifying fitness for purpose. Other methodologies may also be used if desired.

2.4.5 Source

The source of evidence used to determine fitness for purpose. This may include company policies, procedures, plans, and so on.

2.4.6 Responsibility

For actions to happen there needs to be both authority and accountability. Where a shared responsibility is found, it should be made clear how decisions will be made, documented and implemented.

2.4.7 Scoring explained

A simple numeric system allowing some room for judgement is suggested:

- 0 = failure to adequately meet requirements giving rise to exposure to risk
- 1–2 = requirements partially met but remedial actions essential
- 3–4 = most requirements met giving overall adequacy but some room for improvement
- 5 = all requirements fully met at present

At the foot of the form, enter the total score, then enter the number of criteria multiplied by 5 to give the maximum total score. Calculate the score as a percentage of the maximum possible score. Scores are taken forward from forms A to B and summarized in Form C.

Organizations may wish to develop their own scoring methods, if that would be more appropriate for their needs. These may then be substituted on the forms.

2.4.8 Remedial action needed

Briefly note the actions needed to improve the score. In most cases, a risk analysis assessment will have been done to prioritize work needed and establish time-frames for

completion (see matrix on p. 6, for further information). This will be shown in summary B prefix forms.

If large-scale, far-reaching changes are envisaged, additional project management methodologies (such as Prince 2) may be employed. The project reference(s) should be added as they become available.

Descriptions of the type of information that might be expected in each field on forms prefixed 'A' is given in Annex B.

2.5 How to use the forms – Forms B/1 to B/6

Forms B/1 to B/6 provide an opportunity to summarize information in the A range of forms and add priorities, target dates for remedial actions and provide an aggregated score for each step across the organization. The information presented will likely be useful for project planning and monitoring purposes.

2.6 How to use the forms – Form C

The purpose of Form C is to calculate a total score representing the degree of contextual compliance with BS ISO 15489-1 and to present a high-level summary of actions required, who will be responsible for doing them and when they would be expected to be completed. The form could be used for project management and general management reporting purposes.

All forms may be adapted for local use. The emerging picture during the SAC will provide valuable information to feed into business cases, provide a response to audits of systems and support risk registers and risk mitigation or reduction.

It is the intention of this publication that the user will be able, by working through the outlined requirements, to build a portfolio of evidence which can be used to demonstrate compliance to a regulator or ombudsman and also to help highlight where the organization needs to improve practices within its records management programme. The thirteen benefits noted in clause 4 of BS ISO 15489-1 will thus be both achievable and measurable.[5]

5 See *BIP 00025-3:2002, Effective Records Management — Part 3: Performance Management for BS ISO 15489-1*, for further information on this topic.

3 Self-Assessment and Compliance (SAC) Processes

3.1 Step 1 – Records management strategic issues

> **Clause 6.1** An organization seeking to conform to this International Standard should establish, document, maintain and promulgate policies, procedures and practices for records management to ensure that its business need for evidence, accountability and information about its activities is met.

3.1.1 Records and information policies

It is essential that the information and records management policies provide support for the strategic objectives of the organization. In order to assess the adequacy and alignment of the policies, an analysis of the business environment should be carried out in conjunction with senior management. The aim is to determine and document the mission or purpose, aims and objectives of the organization as a whole. Each part of the organization is likely to have its own narrower set of operational aims and objectives which will support the organization's mission.

For any policy to be effective, it should be endorsed by senior management, with an individual manager taking responsibility for 'owning' the policy and ensuring its application and use.

Policy relating specifically to records management should state that the organization's records will be compliant with BS ISO 15489-1, specifically that records will be authentic, reliable, usable and have integrity. It should also state that the systems that are routinely used for managing records will support these characteristics and be comprehensive, systematic and compliant with all requirements arising from the current business.

Several approaches may contribute to this understanding, including SWOT and PEST analysis, an appreciation of the organization's culture and values, technical environment, economic limitations and attitude to and an understanding of the needs and legitimate

expectations of stakeholders. Knowledge of relevant legislation, regulation, other standards and best practices is also needed.

Responsibilities and authorities should be defined and assigned to individuals including those for leadership and accountability, ongoing management of the records management programme, specific projects and for normal record keeping activities and processes (both records specific and those arising from a person's routine job).

The policy should also describe current and/or proposed ways of translating its aims into practical realities, although not describing these in detail. It/they will also identify who will be responsible for implementation, how implementation will be resourced and how the policy will be communicated to all parts of the organization.

The policy or set of related policies should be written or reviewed against the findings of the business environment analysis so that the policy statements are directly relevant to and supportive of the wider organizational aims.

At this stage, records management procedures and practices may or may not already exist, depending on the degree of records management maturity within the organization. These are examined more fully in Step 3 – Records systems characteristics and functionality, p. 21.

3.1.2 SAC criteria: records management strategic issues

ISO	Criteria	Verification	Source	Responsibility
6.2	Define and document policy for records management	Policy statement(s) written	Mission statement Existing policies and procedures SWOT analysis PEST analysis Analysis of regulatory environment	Records manager/ business analyst/ senior manager
6.2	Define and document policy for records management	Policy statements endorsed and communicated effectively	Published documents e.g. employee handbook, intranet, organizational guidelines	Senior manager/ records manager
6.2	Define and document policy for records management	Policy statements understood and applied	Audit compliance reports, policy awareness survey	Business unit manager/auditors
6.2	All information related policies aligned	Policies in agreement	Other policies such as information security, web use, DPA, FOI, etc.	Policy owner/author, records manager

TOP TIP

Use opportunities to advertise, communicate and raise awareness of policies in conjunction with other corporate activities, such as an annual housekeeping day for record disposal/archiving actions. Talk to business units at their departmental meetings and demonstrate how they will benefit by applying good records management policies and practice to their work (see clause 4 of BS ISO 15489-1).

3.2 Step 2 (a) – Records management programme

> **Clause 7.1** Records are created, received, and used in the conduct of business activities. To support the continuing conduct of business, comply with the regulatory environment, and provide necessary accountability, organizations should create and maintain authentic, reliable and useable records, and protect the integrity of those records for as long as required. To do this, organizations should institute and carry out a comprehensive records management programme…

3.2.1 General

A comprehensive records management programme should embrace the management of records arising from all of the activities of the organization. To be compliant with BS ISO 15489-1, each of the following criteria should be met for each process and activity, to the extent that the needs of the organization and any legitimate stakeholders are satisfied.

Confirmation that the criteria for a comprehensive and compliant records management programme have been met can only be done after sections 3.2, 3.3 and 3.4 from the DIRS methodology (as described in the technical report) have been worked through for each business process and their related records.

ISO	Criteria	Verification	Source	Responsibility
7.1	Determine for each business process:			
A	What records should be created	Process map shows points at which records should be created	Output from DIRS steps A, B & C	Records manager/ business analyst
B	What information should be captured in each record	Information content confirmed as meeting business, legal, regulatory and stakeholder needs	Output from DIRS steps A, B & C	Records manager/ business analyst
C	What technology should be used	Appropriate technology used to satisfy record and record-keeping system requirements	Output from DIRS steps A, B & C	Records manager/ business analyst
D	In what form and structure should records be created	Form and structure appropriate for ongoing business use over entire life of record	Output from DIRS steps A, B & C	Records manager/ business analyst
E	What metadata should be created and persistently linked and managed	Metadata identified, schema designed and used, links demonstrated to be persistent	Output from DIRS steps A, B & C	Records manager/ business analyst
F	What rules should apply to metadata	Rules defined and applied	Output from DIRS steps A, B & C	Records manager/ business analyst
G	Requirements for retrieving, using, transmitting records	Retrieval use and transmission of records defined and met	Output from DIRS steps A, B & C	Records manager/ business analyst
H	How long to keep records	Retention and disposal periods determined by analysis of business environment	Output from DIRS steps A, B & C	Records manager/ business analyst
I	How to organize records	Records organized to support users and business needs	Output from DIRS steps A, B & C	Records manager/ business analyst
J	The risks of not having authoritative records	Risks assessed and addressed where necessary	Output from DIRS steps A, B & C	Records manager/ business analyst

K	How to preserve access over time	Preservation and access strategy defined and implemented	Output from DIRS steps A, B & C	Records manager/ business analyst
L	How to comply with legal and regulatory, applicable standards and organizational policy	All relevant legal, regulatory, standards and policy requirements defined and met	Output from DIRS steps A, B & C	Records manager/ business analyst
M	How to ensure a safe and secure environment for records	Security policies in place and implemented	Output from DIRS steps A, B & C	Records manager/ business analyst
N	How to ensure retention limits are applied	Processes and controls determined and applied to ensure records are destroyed at proper time in appropriate ways	Output from DIRS steps A, B & C	Records manager/ business analyst
O	Opportunities to improve effectiveness, efficiency or quality	Processes and activities reviewed for potential improvements, opportunities identified	Output from DIRS steps A, B & C	Records manager/ business analyst
P	Vital records identified, risk analysis completed and appropriate safeguards implemented for business continuity purposes	Vital records identified for critical activities, appropriate protection and recovery mechanisms in place.	Output from DIRS steps A, B & C	Records manager/ business analyst

3.2.2 Step 2 (b) – Determining requirements for records

> **Clause 7.2.1** A record should correctly reflect what was communicated or decided or what action was taken. It should be able to support the needs of the business to which it relates and be used for accountability purposes. As well as the content, the record should contain, or be persistently linked to, or associated with, the metadata necessary to document a transaction, as follows:
>
> *a)* the structure of a record, that is, its format and the relationships between the elements comprising the record, should remain intact;
>
> *b)* the business context in which the record was created, received and used should be apparent in the record (including the business process of which the transaction is part, the date and time of the transaction and the participants in the transaction); and
>
> *c)* the links between documents, held separately but combining to make up a record, should be present.

All organizations rely on records for evidence of their activities to analyse their past activities and for information to develop plans and strategies for the future.

The approach described in BS ISO 15489-1 clause 9.1 and in steps B and C of the DIRS methodology will help to confirm that the right records are created at appropriate points in each business process. Each series or group of records can then be tested to confirm that they have the characteristics required in clause 7.2 to ensure that they are credible and trustworthy.

Certain elements of the characteristics may be met by means of metadata. For example, information about the record creator, sender or the business process may have already been captured in metadata found in the computer operating system, the business application or the record-keeping system (if separate) at the point of the user log-on. Such metadata must be persistently linked to the records that it supports for its entire retention life.

For a record to be usable, it must be eye readable. This implies that it must be capable of being presented and interpreted. Rendering of the record to a computer screen or for printing requires that the structure of the document remains intact. Degradation of the record, especially where this is a textual document, will occur over time as changes are made to systems (e.g. software upgrades) that manage structural metadata. A measure of degradation is inevitable, but should be managed by means of a migration or conversion strategy that takes into account the risk involved in loss of integrity. Some organizations adopt proprietary-software solutions that offer very long-term prospects for retrieval, whereas others prefer more generic approaches, including use of extensible mark-up language or similar. The risks must be weighed against the costs in relation to the business need.

Overall, this section of the SAC process will help to identify the strengths and any weaknesses of existing record-keeping systems that produce, manage and store records. If the records are deficient in any of the required characteristics, it is likely that the process of creation and storage of the record and/or the system on which they are kept will need to be changed in some way to satisfy the requirement.

3.2.3 SAC criteria: authenticity

Definition: authenticity refers to a record which can be proven to be what it purports to be, created by the person (or system) purported to have created or transmitted it at the time purported.

ISO	Criteria	Verification	Source	Responsibility
7.2.2	Proven authenticity of records	Policies and procedures in place that: • authorize agent(s)* to perform actions which result in the creation, transmission, receipt, maintenance, protection, concealment, disclosure or disposal of records • ensure that records are created at or close to the time of the actions or transactions which give rise to the records • ensure that the contents of the record can be proven to be accurate	Operational policies/ operational procedure/ compliance audits	Business unit managers/records managers/auditors

* A member of staff or an automated process, sometimes referred to as 'actors'.

3.2.4 SAC criteria: reliability

Definition: reliability refers to a dependable, trusted record containing a full and accurate representation of a transaction or activity (and any subsequent actions), created at the time by individuals with a direct knowledge of the facts by routinely used instruments (or systems).

ISO	Criteria	Verification	Source	Responsibility
7.2.3	Proven reliability of records	Policies and procedures in place to ensure that individuals with direct knowledge of the facts routinely use authorized instruments or systems to create full and accurate and complete records at the time or soon afterwards	Operational policies/ operational procedure/ compliance audits	Business unit managers/records managers/auditors

3.2.5 SAC criteria: integrity

Definition: integrity refers to a record which is complete and unaltered.

ISO	Criteria	Verification	Source	Responsibility
7.2.4	Proven integrity of records	Policies and procedures in place • to prevent unauthorized addition, deletion, alteration, use, disclosure or concealment • to specify what alterations or additions may be authorized, by whom • to specify that any authorized annotation, addition or deletion be explicitly indicated and traceable	Operational policies/ operational procedure/ compliance audits	Business unit managers/records managers/auditors

3.2.6 SAC criteria: usability

Definition: usability refers to a record which can be located, retrieved, presented and interpreted, with links preserved between other documents in the relevant business process.

ISO	Criteria	Verification	Source	Responsibility
7.2.5	Proven usability of records	Records sampled to verify that • records can be located, retrieved, presented and interpreted • records can be directly connected to the business activity or transaction that produced them • contextual linkages are maintained sufficient to understand the transactions that created the records • records can be identified within the context of the broader business activities and functions • records are available within an acceptable time-frame	Operational policies/ operational procedure/ compliance audits	Business unit managers/records managers/auditors

3.2.7 SAC criteria: metadata

Definition: information about the record which supports its discovery, access, use and disposition.

ISO	Criteria	Verification	Source	Responsibility
7.2.5	Rules exist for creating and capturing metadata and are embedded in relevant business processes Metadata includes structure, business context and links to other records	Rules exist and are followed Metadata exists and is fit for purpose	Operational policies/ operational procedure/ compliance audits business rules/ record sampling	Business unit managers/records managers/auditors

TOP TIP

- Establish what metadata can be repurposed from operating and security systems managed by ICT staff to support record-keeping needs. Document how this will happen.
- Create a vital records schedule which can be used to ensure that in the event of an emergency, business systems which need to be recovered quickly can also restore or recover their records.

3.3 Step 3 – Records systems characteristics and functionality

3.3.1 System requirements

It is important to note that in this context the term system does not have to mean an electronic records management computer program. System is used in a generic way which would include such systems but also may include any set of rules, procedures and methods (including manual systems) for managing records. A well-designed, fit-for-purpose records system will support the creation, capture and ongoing management of records which have the characteristics required by the standard, described in the previous section.

3.3.2 SAC criteria: reliability

Definition: any system deployed to manage records should be capable of continuous and regular operation in accordance with responsible procedures.

ISO	Criteria	Verification	Source	Responsibility
8.2.2	Proven reliability of system	Detailed documentation of system should exist Log any system changes planned or unplanned	Systems provider/ designer Systems log	Systems administrator/ business unit manager/data manager/record manager

3.3.3 SAC criteria: integrity

Definition: control measures such as access monitoring, user verification, authorized destruction and security should be implemented to prevent unauthorized access, destruction, alteration or removal of records. These controls may reside within a records system or be external to the specific system. For electronic records, the organization may need to prove that any system malfunction, upgrade or regular maintenance does not affect the records' integrity.

ISO	Criteria	Verification	Source	Responsibility
8.2.3	Prove integrity of system	System has flexibility to allow complex security to be applied and can be configured to create appropriate audit trails of activity	System manual/ design Policies and procedures Audit log	Systems administrator/ business unit managers/records managers

3.3.4 SAC criteria: compliance

Definition: records systems should be managed in compliance with all requirements arising from current business, the regulatory environment and community expectations in which the organization operates. Personnel who create records should understand how these requirements affect the business actions they perform. Records-system compliance with such requirements should be regularly assessed and the records of these assessments retained for evidential purposes.

ISO	Criteria	Verification	Source	Responsibility
8.2.4	Proven compliance of system	Map system functionality to legal, regulatory and business requirements Document compliance and build in appropriate review process	DIRS steps A, B & C output Register of statutory and regulatory requirements Standing orders business policy	Systems administrator/ business unit manager/auditor/ records manager

3.3.5 SAC criteria: comprehensiveness

Definition: records systems should manage records resulting from the complete range of business activities for the organization, or section of the organization, in which they operate.

ISO	Criteria	Verification	Source	Responsibility
8.2.5	System proven to be comprehensive to meet all business and regulatory requirements particularly the capture of appropriate records	Map system functions to legal, regulatory and business requirements	DIRS steps B & C Retention schedule Process maps of record requirements Audit report	Systems administrator/ business unit manager/auditor/ records manager

3.3.6 SAC criteria: systematic

Definition: records should be created, maintained and managed systematically. Records creation and maintenance practices should be systematized through the design and operation of both records systems and business systems.

ISO	Criteria	Verification	Source	Responsibility
8.2.6	Proven systematic approach to management of records within system	Document systems processes and map to records management policies and procedures	System manuals Records management policies	Systems administrator/ business unit manager/auditor/ records manager

DIRS steps A to E may be used for evaluation of the records system(s).

Records systems are identified, analysed, evaluated and prioritized for improvement on a risk basis.

TOP TIP

- Many electronic systems will have all the functionality that an organization may require – especially if they meet the criteria of an authority such as The National Archives in the UK or equivalent body elsewhere.
- Success in choosing and implementing an electronic system will depend on how the cultural and change management issues are managed since experience has shown that these issues are at least as important as the technical considerations.
- The selection of vendors, system integrators and consultants is also critical to success – it is imperative that careful thought is given to how they will work with and support your project.

3.4 Step 4 – Records management processes and controls

Clause 9.1 Determining which documents should be captured into a records system is based on an analysis of the regulatory environment, business and accountability requirements and the risk of not capturing the records. The requirement is likely to differ according to the type of organization and the legal and social context in which it operates.

3.4.1 Determining documents to be captured into a records system

An analysis of the regulatory environment can be carried out in conjunction with personnel from the business unit concerned and also with internal legal staff. The objective is to understand the evidential and information requirements of sustaining business coupled with the legal or regulatory accountability required by internal or external authorities. These decisions can be further qualified by the risk management culture that may exist in organizations. The result is that similar organizations may reach different conclusions for the records they capture into record systems based on the parameters already outlined.

3.4.2 SAC criteria: determine documents to be created and captured as records

ISO	Criteria	Verification	Source	Responsibility
9.1	Documents capture into records systems is based on a systematic evaluation of business, regulatory and accountability requirements	List or map of business, regulatory and accountability environment List or table of who owns each business risk/accountability requirement Report assessing the risk of non-compliance mapped against each regulatory requirement	Legislation regulation Business standards Quality standards Risk register	Records manager/ business analyst/ lawyer

Records can be created and captured by a variety of technology, and organizations should ensure that the most appropriate means to achieve a systematic approach is adopted and built into business practices. This may also involve identifying individuals and assigning specific responsibilities to achieve this outcome.

3.4.3 Determining how long to retain records

Decisions about how long records should be maintained within a records system are based on an assessment of the regulatory environment, business and accountability requirements and the risk.

Records retention may vary from very short term (one to two years) to longer term (20 to 50 years) depending on a number of criteria to:

- to meet legal or regulatory requirements;
- to establish a corporate memory or knowledge bank to inform both current and future decisions and initiatives; and
- to meet specific operational requirements.

3.4.4 SAC criteria: record retention

Record retention policies need to take account of a wide range of influences. The legal requirement informs the minimum retention whilst operational and other stakeholder requirements may inform longer retention.

ISO	Criteria	Verification	Source	Responsibility
9.2	Document retention decisions are based on a legal, business and stakeholder analysis	Data from business/records analysis Evidence of consultation with stakeholders List of stakeholder legitimate interest in documents Completed retention schedules Minutes/memos Legal advice	Records audits statutes Organizational/ operational policies/ requirements	Business managers/records managers/legal advisers

BS ISO 15489-1, when applied intelligently, will lead to an organization keeping fewer records – but those records will be of a higher quality, and thus be more useful as evidence and as sources of information upon which to base decisions.

TOP TIP

Good retention schedules should contain information describing the records series, how long it is to be kept, what happens at the end of retention and the legal, regulatory or operational reason for retaining the record. Avoid terms like 'best practice' or 'common practice' – they are meaningless and make it difficult for subsequent users to review schedules.

3.4.5 Records capture

The purpose of capturing records into records systems is to:

- establish a relationship between the record, the creator and the business context that originated it;
- place the record and its relationship within a records system; and
- link it to other records.

3.4.6 SAC criteria: records capture and classification

This involves assigning appropriate classification to records and allocating metadata which can be permanently associated with the record. The metadata are vital for understanding the context in which a record was created and also for demonstrating its integrity.

ISO	Criteria	Verification	Source	Responsibility
9.3	Are all records relating to the business of the organization captured into appropriate records systems?	Register of documents which need to be captured	Records audit/ retention schedules	Business managers/records managers
9.3	Are all records relating to the business of the organization captured into appropriate records systems?	Procedural/work instruction manual describing method of capturing records	Records management guidance/manual	Records manager
9.3	Are all records relating to the business of the organization captured into appropriate records systems?	Organizational guidance or policy on capturing records	Records management guidance/policies	Business managers/records manager/auditors
9.3	Are all records relating to the business of the organization captured into appropriate records systems?	Organizational metadata register (may incorporate existing schema, e.g. e-gms3 & organizational-specific metadata)	Records audits/ process mapping/ regulatory requirements	Records manager

TOP TIP

Deciding which records to capture is an organizational risk-based decision informed by legal, regulatory and operational needs. This needs to be periodically reviewed and when new business units/business functions are created.

3.4.7 Registration

Clause 9.4 In a records system which employs registration processes:

– a record is registered when it is captured into the records system;

– no further processes affecting the record can take place until its registration is complete.

Registration is the process of assigning a unique identifier to a record which has been captured into a records system. In an electronic system, this happens as a transparent process and the user does not usually need to take any additional action. This is an optional process under the standard.

3.4.8 SAC criteria: registration

ISO	Criteria	Verification	Source	Responsibility
9.4	Unique identifiers should be assigned to records to allow them to be managed as objects within the system	Electronic systems automatically assign unique identifiers to new records; this has to be done manually in paper systems	Records system	Records system administrator/ records manager

3.4.9 Classification

Classification of business activities acts as a powerful tool to assist the conduct of business and in many of the processes involved in the management of records, including:

- providing linkages between different records which relate to the same activity or function;
- ensuring records are named in a consistent manner over time;
- allowing the retrieval of all records relating to a particular function or activity (this is a particularly useful technique when a broad interrogation of a particular activity is being undertaken);
- determining both the security level for ensuring protection and allowing access to records; and
- allocating user permissions for access to, or action on, particular groups of records.

3.4.10 Classification systems

Classification systems reflect the business of the organization from which they derive and are normally based on an analysis of the organization's business activities. The systems can be used to support a variety of records management processes. Organizations need to determine the degree of classification control they require for their business purposes.

3.4.11 SAC criteria: classification

ISO	Criteria	Verification	Source	Responsibility
9.5	Classification scheme covers all business activity	Classification scheme based on all business activity	Records audit/ business analysis	Records managers/ business manager
		Control process to make additions or deletions to scheme should exist	Organizational processes	Records manager
		Monitoring of level of user accuracy in associating records with the appropriate area of scheme	Systems monitoring log	Records manager
		Ease of use	User survey	Records manager/ business manager

TOP TIP

A starting point for developing a classification scheme can be a functional analysis of the organization based on the functions and activities that the organization carries out. Although professional theory supports the notion of purely functional classification schemes, in practice many organizations have adopted subject-based descriptors at the lower levels for practical purposes.

3.4.12 Vocabulary controls

Classification systems and indexes may be supported by vocabulary controls which are suited to the complexity of the records of an organization. Such vocabulary controls should explain organization-specific definitions or usage of terms.

Vocabulary controls are sometimes called an ontology, although strictly speaking an ontology has a broader definition than simply a vocabulary control. However, in large organizations which generate large numbers of records across many business units, there is a need to ensure conformity in use of classification tools and use of vocabulary. Different parts of the organization or even its partners or customers may use different names for the same kinds of entities; conversely, they may use the same names for different kinds. An ontology in this context allows a degree of standardization in naming conventions.

3.4.13 SAC criteria: vocabulary controls

ISO	Criteria	Verification	Source	Responsibility
9.5.3	Ontology created if identified as an appropriate tool to support information classification	Ontology based on business rules, conventions and validated by actors (staff carrying out process) in processes Identified and documented process to allow amendments to ontology	Records audit/ business analysis Organizational processes	Records managers/ business manager/systems administrator Records manager

3.4.14 Indexing

Indexing can be done manually or be automatically generated. It may occur at various levels of aggregation within a records system.

Guidance on indexing can be found in ISO 5963, *Documentation — Methods for examining documents, determining their subjects, and selecting indexing terms*.

3.4.15 Allocation of numbers and codes

Shorthand methods of referencing records by means other than the title are commonly used. The allocation of numbers or codes is usually undertaken for an aggregation of records.

The purpose of coding is associated with a location function, where the number or code indicates the 'address' of the record, so that the record may be retrieved by specifying the residence within the records system.

3.4.16 SAC criteria: indexing

ISO	Criteria	Verification	Source	Responsibility
9.5.4	Indexing scheme covers all business activity	Indexing scheme based on all business activity	Records audit/ business analysis	Records managers/ business manager

3.4.17 Storage and handling

Records should be stored on media that ensure their usability, reliability, authenticity and preservation for as long as they are needed. This may cover a considerable time-span for some records.

Records require storage conditions and handling processes which take into account their specific physical and chemical properties. Records of continuing value, irrespective of format, require higher-quality storage and handling to preserve them for as long as that value exists. Storage conditions and handling processes should be designed to protect records from unauthorized access, loss or destruction, and from theft and disaster.

Organizations should have strategies for both the conversion or migration of records from one format to another (if applicable) or to a new records system.

Digital records should be managed in systems that will preserve their accessibility, authenticity, reliability and usability and any change of system should ensure these characteristics are maintained for the life of the record. There may be valid business or technological reasons for migrating or converting records. Where this does occur, evidence of the process and any evidence of what took place should be maintained in order that the effect on the integrity and other characteristics of records identified in BS ISO 15489-1 can be open to scrutiny.

3.4.18 SAC criteria: storage

ISO	Criteria	Verification	Source	Responsibility
9.6	Organizational records are stored appropriately	Standard for storage of physical records Requirements for records format identified Criteria for safe conversion/ migration of records	Policy for physical storage of records Records audit Migration policy	Records manager/ archivist Records manager Records manager/ systems administrator

TOP TIP

When migrating records, it is essential that associated metadata are also migrated.

3.4.19 Access

Organizations should have formal guidelines regulating who is permitted access to records and in what circumstances. These rules can be based on the requirements of the regulatory environment in which the organization operates. They can also be based on specific legislation such as the Freedom of Information Act 2000 and the Data Protection Act 1998. Organizations will also have their own internal operational and other considerations which determine access to records and information.

An organization should establish broad principles on access rights and the application of restrictions on these should be incorporated into the operation of records systems and be part of the design process. Records may contain personal, commercial or operationally sensitive information which may require access to be strictly controlled or denied.

Restrictions on access can be applied both within an organization and to external users. Access controls may be assigned in various ways, such as to a class of records or group of individuals. Equally, it may be linked to roles within the organization. This is a risk-based decision taken by the organization related to legal and operational considerations.

Managing the access process involves ensuring that:

- access rules are applied to records (these rules may change over time);
- access is only granted to those who are authorized;
- encrypted records can be read as and when required and authorized; and
- records processes and transactions are only undertaken by those authorized to perform them.

3.4.20 SAC criteria: access

ISO	Criteria	Verification	Source	Responsibility
9.7	Ensure appropriate access controls in place	Access/security rules policy Monitoring and mapping of user permissions and functional job responsibilities	Records/security audit DIRS process mapping	Records manager Business manager/records manager/HR manager

TOP TIP

Organizations compliant with BS 7799 will meet many of the requirements for access and security within BS ISO 15489-1.

3.4.21 Tracking

Tracking of the movement and use of records within a records system is required to identify outstanding action required, enable retrieval of a record, prevent loss of records, monitor usage for systems maintenance and security, and maintain an auditable trail of records transactions (i.e. capture or registration, classification, indexing, storage, access and use, migration and disposition), and maintain capacity to identify the operational origins of individual records where systems have been amalgamated or migrated.

3.4.22 Action tracking

BS ISO 15489-1 also refers to action tracking which relates to workflows within an EDRM or other system, i.e. processes where time-limits for actions are imposed by or on the organization.

Action tracking may be implemented in a records system for processes where time limits for actions are imposed by or on the organization. Action tracking:

- allocates steps to be taken in response to decisions or transactions documented in a record;
- assigns responsibility for action to a designated person; and
- records times/dates by which the predefined action is to be taken and dates when those actions occur.

Action tracking can only be effectively implemented if material is registered in the records system prior to forwarding to the designated persons.

3.4.23 Location tracking

The movement of records should be documented to ensure that items can always be located when required. Tracking mechanisms may record the item identifier, the title, the person or unit having possession of the item and the time/date of movement.

The system should track the issue, transfer between persons and return of records to their 'home' location or storage, as well as their disposition or transfer to any other authorized external organization including an archives authority.

3.4.24 SAC criteria: tracking

ISO	Criteria	Verification	Source	Responsibility
9.8	Records can be tracked	Systems manual/audit demonstrating tracking ability	Systems manual/ systems audit	Records manager/systems administrator
9.8	Records are tracked	Tracking report	System	Systems administrator

3.4.25 Implementing disposition

Disposition authorities that govern the removal of records from operational systems should be applied to records on a systematic and routine basis, in the course of normal business activity. No disposition action should take place without the assurance that the record is no longer required, that no work is outstanding and that no litigation or investigation is current or pending which would involve relying on the record as evidence.

Relevant legislation, standards and policies should be recorded, to determine requirements for practice, review, audit and testing of records management processes. Close attention should be paid to other information systems and policies in use within the organization to maintain the corporate integrity of the information management environment.

All decisions on which records should be captured and how long records should be maintained should be clearly documented and retained. Decisions may be presented as a disposition authority. Formal documentation of the analysis or other assessment that results in decisions to capture and retain records should be prepared and submitted to senior management for approval. The documentation should contain details of business activities and the records that result from each business activity, and specify their retention periods and disposition actions.

Disposition action may encompass:

- immediate physical destruction, including overwriting and deletion;
- retention for a further period within the business unit;
- transfer to an appropriate storage area or medium under organizational control;
- transfer to another organization that has assumed responsibility for the business activity through restructure, sale or privatization;
- transfer to a storage area managed on behalf of the organization by an independent provider with whom appropriate contractual arrangements have been established;
- transfer of responsibility for management to an appropriate authority while physical storage of the record is retained by the creating organization;
- transfer to an organizational archive; or
- transfer to an external archives authority.

The following principles should govern the physical destruction of records:

- destruction should always be authorized;
- records pertaining to pending or actual litigation or investigation should not be destroyed;
- records destruction should be carried out in a way that preserves the confidentiality of any information they contain; and
- all copies of records that are authorized for destruction, including security copies, preservation copies and back-up copies, should be destroyed.

3.4.26 SAC criteria: disposition

ISO	Criteria	Verification	Source	Responsibility
9.9	Destruction should always be authorized	Records are destroyed in line with organizational retention schedules Clear operational guidelines exist for any destruction authorization process not covered by retention schedules Pertinent legislation or operational requirements are identified for retention purposes	Retention schedule Other authorized processes/ scheme of delegation Retention schedule	Records manager/ legal officer HR/senior manager Records manager/ legal officer
	Records pertaining to pending or actual litigation or investigation should not be destroyed	Demonstrate ability to put a hold on records required for litigation or investigation	System manual/ disposition process/evidence of occurrence	Records manager
	Records destruction carried out in such a way that confidentiality of any information contained in records is maintained	Certificate of destruction, destruction processes	Certificate of destruction/ contract with service provider	Records manager
	All copies of records that are authorized for destruction, including security copies, preservation copies and back-up copies should be destroyed	Evidence of process	Certificates of destruction/ destruction logs/contract conditions for third-party suppliers	Records manager
	Transfer of records to third party or archival authority	Records are transferred in accordance with a process agreed with the third party or archival authority	Loan or deposit agreements/ record transfer lists/logs and/or audit trails for electronic records	Records manager/ archivist/senior manager

3.4.27 Long term preservation of electronic records

Transfer of paper records to an archive for permanent preservation has in the past been an activity that did not require a great deal of advance planning. Paper is relatively stable and provided that environmental conditions for storage are reasonably stable but not extreme, then the expected life of the paper may be many decades without significant conservation measures.

Electronic records however, will survive technical obsolescence only if specific measures are taken to ensure their longevity, starting if possible at the design phase of new records systems. Software and hardware changes occur regularly and can lead to progressive or even catastrophic loss of integrity of the records. A strategy for migration or conversion of electronic records and their metadata is essential if they are to survive changes in software and hardware.

Many organizations are seeking to save electronic records for long term preservation in a format that is independent of their current technical environment (such as XML) or are retaining the original 'bit-stream' for conversion in the future when required. Solutions to long term preservation are still evolving and organizations that have this requirement should continue to monitor developments closely. National archival institutes, professional and standards bodies as well as certain universities are good sources of information.

TOP TIP

It is almost certain that no existing electronic format or medium will survive in the long term, but by taking a pragmatic approach, the risk of loss of information can be reduced to an acceptable level. This may mean focussing on the content of the records rather than the presentation or rendered format – a noticeable departure from conventional archival thinking.

3.4.28 Documenting records management processes

Documentation describing records management processes and records systems should address legal, organizational and technical requirements. Authority for records management processes, such as classification, indexing, review and disposition of records should be clearly stated.

This obviously involves having clearly delegated authorities to those staff involved in records management activities. Decoding the appropriate level and scope of the delegation will be different in each organization and based on the rules for delegating other authorities. The important issue is that at whatever level the authority is vested, this is clear and transparent.

Part of this delegation will cover the development and accountability for records management instruments:

- destruction authorities;
- business classification scheme;

- indexes;
- ontologies; and
- metadata.

3.4.29 SAC criteria: records management processes documented

ISO	Criteria	Verification	Source	Responsibility
9.10	Records management processes are documented	Evidence of processes	Records management manual/process maps/scheme of delegation/job descriptions identifying responsibility/ policies/ procedures	Records manager/ HR manager/ senior manager

3.5 Step 5 – Training in requirements for records management

> **Clause 11** An organization seeking to conform to this International Standard should establish an ongoing programme of records training. Programmes for training in requirements for records management and specific practices should encompass the roles and responsibilities of, and be addressed to, all members of management, employees, contractors, volunteers and any other individuals responsible for the whole or part of a business activity of an organization in making records during their work and in capturing those records into records systems. The training programmes can be designed and set up in cooperation with external organizations.

3.5.1 Purpose of training

The purpose of training is to ensure that staff at all levels have adequate competencies to support and enable the records management programme to realize those benefits identified in BS ISO 15489-1, clause 4, consistent with the responsibilities assigned to them.

3.5.2 Who should be trained?

These competencies are not limited to those with direct responsibility for designing and implementing a records management programme. Business records are owned by the organization itself and maintained and managed by individuals on its behalf. All staff who create and use records require training so that they understand the concepts contained in the standard as it relates to them and to the organization as a whole. They will need to

understand policies and procedures specific to their job and how they interact with records management processes and controls. The standard encourages a sense of 'stewardship' in fulfilling their roles and responsibilities to create and manage compliant records.

Records management professionals have primary responsibility for implementing BS ISO 15489-1. Consequently, their competencies include development and implementation of policy through programmes, services and projects so that records management is integrated with business processes. The scope of their work is defined in clause 4 (first part).

Management competencies include support for translating high-level policies into a successful records management programme, setting up the organizational structures and allocating resources and promoting compliance with procedures.

Business unit managers' competencies include ensuring that their staff create and keep compliant records and work in accordance with established policies, procedures and standards and allocation of adequate resources. They liaise with records managers in relation to BS ISO 15489-1.

Some organizations may choose to employ a qualified records manager either on a permanent or temporary basis. Others may choose to buy in expertise from consultancies to set up new or review existing programmes and to run specific records management projects. It is important that professional training and qualifications are considered as part of the selection process when choosing external help.

TOP TIP

Some organizations have adopted the concept of records management 'super users', that is, people who have a higher understanding of the records management programme in an organization through training and formal networking with other super users, but are not full-time records specialists. Through such networks both consistency of practice and a comprehensive knowledge of how the programme is working can be gained.

3.5.3 Training opportunities

Training methods may be delivered by a number of routes, including:

- staff induction programme;
- internal training sessions for employees new to particular responsibilities or at times of system change provided by records management personnel in conjunction with ICT and HR specialists;
- on-the-job training and coaching provided as part of a formal programme or informally by knowledgeable supervisors or peers;
- briefing sessions and seminars on specific record issues or initiatives;
- leaflets and booklets providing short 'how-to' guides describing aspects of the organization's record policies or practices;

- computer-based presentations, which may be interactive, available on the corporate network or distributed on removable media;
- help text provided within a computer-based system; and
- training courses provided by educational institutions or professional organizations that may be part of the general offerings of these institutions or may be developed on request to meet an organization's particular needs. These may lead to certification or qualifications and be delivered by full or part time attendance or by distance learning.

3.5.4 Evaluation and review of training

Training programmes can be evaluated by measuring improvements in performance or increased skill and competence levels by the employee using the records system. This may require measurement against the level of training undergone, and operational audits of the records system in the organizational unit. The programme may also monitor and record staff skill levels against the requirements set out in the training programme.

The effectiveness and efficiency of the records training programme will be enhanced if it is regularly reviewed and reports provided to management through the organization's usual channels.

Regular review of the training programme and level of trainee satisfaction with courses and other activities provided should also be assessed and used for training programme evaluation purposes.

3.5.5 SAC criteria: training

ISO	Criteria	Verification	Source	Responsibility
11	Comprehen-sive training for records managers	Vocational or professional qualification	University or professional society	HR/senior management
11	Adequate training for managers, employees, contractors, volunteers and others	Formal record of training/ coaching or mentoring	Training records in HR and employing business unit/CV	Senior management/HR management

TOP TIP

Include records management requirements from organizational policy and related documents in induction training for new staff, so as to increase awareness of their stewardship responsibilities in caring for corporate information.

3.6 Step 6 – Monitoring and auditing

3.6.1 Monitoring compliance

In following the guidance in this publication, an organization should have a substantial evidence portfolio on which they can demonstrate their compliance with BS ISO 15489-1. As with initiative to reach compliance with a standard, there needs to be a planned ongoing monitoring regime to ensure that, first, compliance is maintained at the required level and, second, that any modifications to the programme do not affect that compliance. There is also a need to be aware of when compliance thresholds are raised because of new organizational requirements or initiatives.

3.6.2 SAC criteria: monitoring and auditing

ISO	Criteria	Verification	Source	Responsibility
12	Comprehensive monitoring undertaken and documented	Compliance audit completed and measured against regulatory regime	Compliance reports and audit reports	HR/compliance officers/records managers
12	Recommendations for improvements taken forward	SAC audit documents improvements and improves compliance score	SAC reports	Records managers/auditors

3.6.3 Responsibility for monitoring

To a certain extent, the responsibility for monitoring compliance is dependent on how the organization manages its general compliance requirements. Larger organizations may have compliance teams whose role is to identify and monitor any compliance requirements that the organization may have. In this instance, the appropriate staff should be briefed about the standard and what the organizational objectives are in maintaining compliance.

TOP TIP

It makes good sense to include personnel from this area in any initial work that is taken to build the compliance portfolio both for their expertise in doing this work and then to be fully immersed in understanding the rationale of adopting BS ISO 15489-1.

In other organizations, it may fall to the information/records professional to monitor ongoing compliance. This could become a full-time role and means of reducing time-consuming work need to be sought. The use of performance indicators[6] can be a way of alerting the monitor to potential problems. It is also possible to build a support capacity by delegating some of the activity to business managers as part of their business-monitoring regimes.

6 See BIP 0025-3, *Performance Measurement for BS ISO 15489-1*, which describes a number of approaches in this area.

Annex A
Summary of the DIRS steps

The DIRS approach is made up of the following steps.

A) Preliminary investigation.

B) Analysis of business activity.

C) Identification of requirements for records.

D) Assessment of existing systems.

E) Identification of strategies for satisfying records requirements.

F) Design of a records system.

G) Implementation of a records system.

H) Post-implementation review.

Initially this approach focuses on the strategic aims of the organization and the policies it has developed to meet its internal aims and the requirements of its external environment. It moves to the functions that contribute to its overall aims and objectives after which it drills down to the activities and processes that underpin each function.

In each case, the business need, expressed as a desired condition, is identified, the current situation is defined and measured against these requirements and then the gap between the two is noted. (Additionally, the scoring system proposed in this publication enables the reviewer to determine and prioritize what remedial actions are required to deliver fit for purpose records).

The eight steps are described in more detail as follows:

A) Preliminary investigation. Collect information from documentary sources and through interviews; identify and document the role and purpose of the organization, its structure, its legal, regulatory, business and political environment, critical factors and critical weaknesses associated with records management.

B) Analysis of business activity. Collect information from documentary sources and through interviews; identify and document each business function, activity and transaction and establish a hierarchy of them, that is, a business classification system;

and identify and document the flow of business processes and the transactions which comprise them.

C) Identification of requirements for records. Collect information from documentary sources and through interviews; identify the requirements for evidence of and information about each business function, activity and transaction, which should be satisfied through records. The requirements can be derived from an analysis of the organization's regulatory environment (see clause 5) and the risk of not creating and maintaining the records. Determine how each requirement may be satisfied through records management processes, and articulate and document the requirements for records. Choose the appropriate records structure which best satisfies each business function, activity or transaction.

D) Assessment of existing systems. Identify and analyse existing records systems and other information systems to measure their performance against the requirements for records.

E) Identification of strategies for satisfying records requirements. Identify strategies for satisfying records requirements, which may include adopting policies, standards, procedures and practices, designing new systems and implementing systems in a way which satisfies a requirement for records. Strategies may be applied to each records requirement separately or in combination. Strategies should be selected on the basis of the degree of risk involved through failure to satisfy a requirement either within the business function which the records system is intended to support, the existing systems environment, or the corporate culture in which the strategy should succeed (see clause 7).

F) Design of a records system. Design a records system which incorporates the strategies, processes and practices described in this international standard; ensure that the records system supports, and does not hinder, business processes; assess and, if necessary, redesign business processes and operational business and communication systems to incorporate records management.

G) Implementation of a records system. Implementing a records system should be undertaken systematically using project planning and methodologies appropriate to the situation and with a view to integrating the operation of records systems with business processes and related systems.

H) Post-implementation review. Gather information about the performance of the records system as an integral and ongoing process. This may be undertaken by interviewing members of management and key employees, using questionnaires, observing the system in operation, examining procedures manuals, training materials and other documentation, and carrying out random checks on the quality of records and control measures. Review and assess the performance of the system, initiate and monitor corrective action and establish a regime of continuing monitoring and regular evaluation.

The actions needed to comply with BS ISO 15489-1 requirements to meet an organization's unique circumstances and its attitude to risk can then be identified, prioritized and costed. Resulting projects or changes in processes may be then be assessed and scored after implementation to enable the improvements to be clearly seen.

Annex B
Guidance for completing survey and analysis forms

This annex contains sample survey and analysis forms with guidance notes for completion shown in *italic typeface*.

Policy and responsibilities				**Form A Ref: A/1/*a***	**Completed by:**		
Name of policy, procedure or practice: *(may be organization-wide or departmental)*					**Date:**		
ISO Ref	**Criteria**	**Requirement detail**	**Verification – fitness for purpose**	**Source**	**Responsibility**	**Score**	**Further action needed**
6.2	**Policy for records management exists**	*Derived from review of internal documentation and practice* *e.g. a) information management and records retention policies exist and accurately reflects best practice, relevant standards, organizational environment, economic considerations and current business need* *b) adopted by senior management* *c) communications strategy*	*From gap analysis, are requirements met?* *e.g. managers and staff are aware of policies and apply them; policies aligned and relevant*	*e.g. company intranet, staff handbook, departmental documentation*	*e.g. records manager writes policy in conjunction with colleagues and sign off by senior management*	*See below*	*Action needed to improve score (e.g. revise document creation and capture regimes)* *e.g. add section to IM policy to indicate that compliance with BS ISO 15489-1 is being pursued*
6.3	**Responsibilities (general)**	*e.g. a) specific authority and responsibilities defined and assigned* *b) resourced* *c) communicated*	*e.g. people aware of their responsibilities; reflected in job descriptions and appraisals; audited*	*e.g. policies, procedures and directives*	*e.g. senior and line managers, human resources, individual staff*	*See below*	*Action needed to improve score (e.g. create specific retention schedules for records in relevant system or process)* *e.g. responsibility for certain actions not clearly stated – determine and provide necessary authority*

Note: Forms prefixed 'A' may contain several pages depending on the number of criteria being assessed, the degree of complexity of the requirements and the amount of text needed, but the last three lines of this table should appear only at the end of the form. **Total score**		
Total possible score (5 x number of criteria assessed)		
Percentage score		**Take forward to summary sheet**

Scoring evaluation:

0 = fails to meet basic requirement
1–2 = partially meets requirement, but important or high-risk elements missing or inadequate
3–4 = mostly meets requirement with only minor or low-risk elements missing
5 = fully meets requirement

Records management processes and controls				**Form A Ref: A/5/*a***	**Completed by:**		
Name of system or process: *(may be organization-wide or departmental)*					**Date:**		
ISO Ref	**Criteria**	**Requirement detail**	**Verification – fitness for purpose**	**Source**	**Responsibility**	**Score**	**Further action needed**
9.1	**Determine documents to be captured into system**	*Derived from analysis of environment and business need (see also Metadata)*	*From gap analysis, are requirements met?*	*DIRS step(s)*	*Who has authority for introducing change or ongoing control?*	*See evaluation note below*	*Action needed to improve score e.g. revise document creation and capture regimes*
9.2	**Determine how long to keep records**	*Derived from accountability and risk assessment and review of regulatory, legal and business environments*	*Rights, duties and obligations to all stakeholders considered, minimum retention periods identified*	*DIRS step(s), risk register, policy documents and system documentation*	*Who is accountable and authorized to determine retention periods?*	*See evaluation note below*	*Action needed to improve score e.g. create specific retention schedules for records in relevant system or process?*
9.3	**Records capture**						
9.4	**Registration**						
9.5	**Classification**						
9.6	**Storage and handling**						
9.7	**Access**						
9.8	**Tracking**						
9.9	**Implementing disposition**						

9.10	**Documenting records management processes**						
					Total score		
					Total possible score (5 x number of criteria assessed)		
					Percentage score		**Take forward to summary sheet**

Scoring evaluation:

0 = fails to meet basic requirement
1–2 = partially meets requirement, but important or high-risk elements missing or inadequate
3–4 = mostly meets requirement with only minor or low-risk elements missing
5 = fully meets requirement

Policy and responsibilities				**Form B Ref: B/1/*a***		
Form A Reference	**System or process**	**Score (%)**	**Actions required**	**Priority***	**Responsibility**	**Target date for remedial action(s)**
From individual survey form (e.g. A5/01)	*Name of system (may be organization-wide or departmental)*	*% score*	*Specific actions brought forward*	*H/M/L*	*Who will make changes?*	*Date by which change needed*
From individual survey form (e.g. A5/01)	*Name of system (may be organization wide or departmental)*	*% score*	*Specific actions brought forward*	*H/M/L*	*Who will make changes?*	*Date by which change needed*
From individual survey form (e.g. A5/02)	*Name of system (may be organization-wide or departmental)*	*% score*	*Specific actions brought forward*	*H/M/L*	*Who will make changes?*	*Date by which change needed*
	Average percentage score:	*%*	*This score should appear only at the end of the form even when several pages may be used*			

* Priority based on risk matrix (see p. 4) H/M/L = High/Medium/Low

Grand total – self-assessment compliance score

Name of organization:			**Date SAC audit completed:**		**Date for next SAC review:**	
Ref	**SAC section**	**Score (%)**	**Actions required**	**Priority**	**Responsibility**	**Target date for remedial action(s)**
1	Policy and responsibility	*Based on 'B' forms*	*Summary from all 'B' sets of forms entered in this column*	*H/M/L based on risk*	*Who will be responsible for actions?*	*Date to be before next SAC review*
2	Records management requirements					
3	Design and implementation					
4	Process and control					
5	Monitoring and audit					
6	Training					
	Average percentage score:					

Total percentage compliant with BS ISO 15489-1: %

Signed …….. Date……..

Position …….

Annex C
Sample survey and analysis forms

Policy and responsibility				**Form A/1 Ref: A/1/*a***	**Completed by:**		
Name of system or process: *(may be organization-wide or departmental)*					**Date:**		
ISO Ref	**Criteria**	**Requirement detail**	**Verification – fitness for purpose**	**Source**	**Responsibility**	**Score**	**Further action needed**
9.1	**Determine documents to be captured into system**						
9.2	**Determine how long to keep records**						
9.3	**Records capture**						
9.4	**Registration**						
9.5	**Classification**						
9.6	**Storage and handling**						
9.7	**Access**						
9.8	**Tracking**						
9.9	**Implementing disposition**						
9.10	**Documenting records management processes**						
					Total score		
					Total possible score (10 x number of criteria assessed)		
					Percentage score		**Take forward to summary sheet**

Scoring evaluation:

0 = fails to meet basic requirement
1–2 = partially meets requirement, but important or high-risk elements missing or inadequate
3–4 = mostly meets requirement with only minor or low-risk elements missing
5 = fully meets requirement

Records management requirements – record characteristics				Form A/2 Ref: A/2/*x*	Completed by:		
Name of System or Process: *(may be organization-wide or departmental)*					**Date:**		
ISO Ref	**Criteria**	**Requirement detail**	**Verification – fitness for purpose**	**Source**	**Responsibility**	**Score**	**Further action needed**
7.2.1	**Structure of records intact**						
7.2.2	**Records authentic**						
7.2.3	**Records reliable**						
7.2.4	**Records have integrity**						
7.2.5	**Records usable**						
					Total score		
					Total possible score (10 x number of criteria assessed)		
					Percentage score		**Take forward to summary sheet**

Scoring evaluation:
0 = fails to meet basic requirement
1–2 = partially meets requirement, but important or high-risk elements missing or inadequate
3–4 = mostly meets requirement with only minor or low-risk elements missing
5 = fully meets requirement

Design and implementation – records system characteristics				**Form A/3 Ref: A/3/*x***	**Completed by:**		
Name of System or Process: *(may be organization-wide or departmental)*					**Date:**		
ISO Ref	**Criteria**	**Requirement detail**	**Verification – fitness for purpose**	**Source**	**Responsibility**	**Score**	**Further action needed**
8.2.2	**Reliability – continuous and regular operation**						
8.2.3	**Integrity – control measures in place**						
8.2.4	**Compliant with all business requirements**						
8.2.5	**Comprehensive in scope**						
8.2.6	**Systematic in operation**						
					Total score		
					Total possible score (10 x number of criteria assessed)		
					Percentage score		**Take forward to summary sheet**

Scoring evaluation:

0 = fails to meet basic requirement
1–2 = partially meets requirement, but important or high-risk elements missing or inadequate
3–4 = mostly meets requirement with only minor or low-risk elements missing
5 = fully meets requirement

Design and implementation – records system functionality				Form A/4 Ref: A/4/*x*	Completed by:		
Name of system or process: *(may be organization-wide or departmental)*					Date:		
ISO Ref	**Criteria**	**Requirement detail**	**Verification – fitness for purpose**	**Source**	**Responsibility**	**Score**	**Further action needed**
8.3.2	**Complete and accurate representations of all transactions for records**						
8.3.3	**Physical storage medium appropriate and protected**						
8.3.4	**Alternative storage locations supported where required**						
8.5.5	**Migration and/or conversion strategy covers entire retention life of records**						
8.3.6	**Access, retrieval and use controlled and adequate for purpose**						
8.3.7	**Retention and disposition processes adequate**						
8.5	**Discontinued systems maintained until all records removed**						
					Total score		
					Total possible score (10 x number of criteria assessed)		
					Percentage score		**Take forward to summary sheet**

Scoring evaluation:

0 = fails to meet basic requirement
1–2 = partially meets requirement, but important or high-risk elements missing or inadequate
3–4 = mostly meets requirement with only minor or low-risk elements missing
5 = fully meets requirement

Records management processes and controls				**Form A/5 Ref: A/5/*x***	**Completed by:**		
Name of system or process: *(may be organization-wide or departmental)*					**Date:**		
ISO Ref	**Criteria**	**Requirement detail**	**Verification – fitness for purpose**	**Source**	**Responsibility**	**Score**	**Further action needed**
9.1	**Determine documents to be captured into system**						
9.2	**Determine how long to keep records**						
9.3	**Records capture**						
9.4	**Registration**						
9.5	**Classification**						
9.6	**Storage and handling**						
9.7	**Access**						
9.8	**Tracking**						
9.9	**Implementing disposition**						
9.10	**Documenting records management processes**						
					Total score		
					Total possible score (10 x number of criteria assessed)		
					Percentage score		**Take forward to summary sheet**

Scoring evaluation:

0 = fails to meet basic requirement
1–2 = partially meets requirement, but important or high-risk elements missing or inadequate
3–4 = mostly meets requirement with only minor or low-risk elements missing
5 = fully meets requirement

Training				Form A/6 Ref: A/6/*x*	Completed by:		
Name of system or process: *(may be organization-wide or departmental)*					**Date:**		
ISO Ref	**Criteria**	**Requirement detail**	**Verification – fitness for purpose**	**Source**	**Responsibility**	**Score**	**Further action needed**
11	**Training programme instituted for users**						
11	**Training programme instituted for records management professionals**						
11	**Senior management committed to programme**						
11	**Training evaluated and reviewed**						
					Total score		
					Total possible score (10 x number of criteria assessed)		
					Percentage score		**Take forward to summary sheet**

Scoring evaluation:

0 = fails to meet basic requirement
1–2 = partially meets requirement, but important or high-risk elements missing or inadequate
3–4 = mostly meets requirement with only minor or low-risk elements missing
5 = fully meets requirement

Monitoring and auditing				**Form A/7 Ref: A/7/*x***	**Completed by:**		
Name of system or process: *(may be organization-wide or departmental)*					**Date:**		
ISO Ref	**Criteria**	**Requirement detail**	**Verification – fitness for purpose**	**Source**	**Responsibility**	**Score**	**Further action needed**
10	**Compliance monitoring undertaken**						
10	**External auditing completed satisfactorily**						
10	**Recommendations for modifications taken forward**						
10	**Compliance documented**						
					Total score		
					Total possible score (10 x number of criteria assessed)		
					Percentage score		**Take forward to summary sheet**

Scoring evaluation:

0 = fails to meet basic requirement
1–2 = partially meets requirement, but important or high-risk elements missing or inadequate
3–4 = mostly meets requirement with only minor or low-risk elements missing
5 = fully meets requirement

Records management policy and responsibility				Form B/1 Ref: B/3/x		
Form A Ref	**System or process**	**Score (%)**	**Actions required**	**Priority***	**Responsibility**	**Target date for remedial action(s)**
	Average percentage score:	**%**				

* Priority based on risk matrix (see p. 4).

Records management requirements – records characteristics				Form B/2 Ref: B/3/x		
Form A Ref	**System or process**	**Score (%)**	**Actions required**	**Priority***	**Responsibility**	**Target date for remedial action(s)**
	Average percentage score:	%				

* Priority based on risk matrix (see p. 4).

Records system characteristics				Form B/3 Ref: B/3/x		
Form A Ref	**System or process**	**Score (%)**	**Actions required**	**Priority***	**Responsibility**	**Target date for remedial action(s)**
	Average percentage score:	%				

* Priority based on risk matrix (see p. 4).

Records system functionality				**Form B/4 Ref: B/4/x**		
Form A Ref	**System or process**	**Score (%)**	**Actions required**	**Priority***	**Responsibility**	**Target date for remedial action(s)**
	Average percentage score:	**%**				

* Priority based on risk matrix (see p. 4).

Records management processes and controls				Form B/5 Ref: B/5/x		
Form Ref	**System or process**	**Score (%)**	**Actions required**	**Priority***	**Responsibility**	**Target date for remedial action(s)**
	Average percentage score:	**%**				

* Priority based on risk matrix (see p. 4).

Records management training				Form B/6 Ref: B/6/x		
Form Ref	**System or process**	**Score (%)**	**Actions required**	**Priority***	**Responsibility**	**Target date for remedial action(s)**
	Average percentage score:	%				

* Priority based on risk matrix (see p. 4).

Records management monitoring and auditing				Form B/7 Ref: B/7/x		
Form Ref	**System or process**	**Score (%)**	**Actions required**	**Priority***	**Responsibility**	**Target date for remedial action(s)**
	Average percentage score:	%				

* Priority based on risk matrix (see p. 4).

Grand total – self-assessment compliance score: Form C

Name of organization:			**Date SAC audit completed:**		**Date for next SAC review:**	
Ref	**SAC section**	**Score (%)**	**Actions required**	**Priority**	**Responsibility**	**Target date for remedial action(s)**
1	Policy and responsibility					
2	Records management requirements					
3	Design and implementation					
4	Process and control					
5	Monitoring and audit					
6	Training					
	Average percentage score:	**%**				

Total percentage compliant with BS ISO 15489-1: %

Signed …….. Date……..

Position …….

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