

To All Staff

NIAO RECORDS MANAGEMENT

This circular outlines the NIAO records management system. It sets out responsibilities and procedures relating to the creation, keeping, maintenance and disposal of records. This circular should be read in conjunction with APC 01/05. PPC 17/04 and MIC 08/10 are hereby cancelled

Introduction

1. The Northern Ireland Audit Office (NIAO) is subject to the Public Records Act (NI) 1923, which sets out the duties of public record bodies in Northern Ireland in respect of the records they create and requires that records should be transferred to, and preserved by, the Public Record Office of Northern Ireland (PRONI).
2. NIAO is committed to creating, keeping and managing records which document its principal activities. Effective records management is vital to ensure that statutory requirements and the NIAO's information needs are met.
3. In managing its records, the Office takes into consideration:
 - (1) guidance issued by PRONI, including the Northern Ireland Records Management Standard (NIRMS), (<http://proni.nics.gov.uk/NIRMS/edrm.htm>); and
 - (2) the 'Lord Chancellor's Code of Practice on the Management of Records by Public Authorities and the Transfer and Review of Public Records under the Freedom of Information Act 2000', issued under section 46 of the Freedom of Information Act 2000 (www.dca.gov.uk/foi/codemanrec.htm) and generally applicable from January 2005. The Code advises that:

"Any freedom of information legislation is only as good as the quality of the records to which it provides access. Such rights are of little use if reliable records are not created in the first place, if they cannot be found when needed or if the arrangements for their eventual archiving or destruction are inadequate."

- (3) various other guidance, including Cabinet Office guidance, Companies Act requirements and the document retention requirements of the International Standards for Auditing.
4. This circular provides guidance on the NIAO records management system, including the procedures which staff must follow in the handling of records.

Responsibilities

Division A

5. The Division A Directorate has lead responsibility for records management in the Office, including the provision of procedures and guidelines, and the monitoring of their implementation.
6. Central Services Branch (CSB) is responsible for the day to day records management, and undertakes the following in relation to the Office's manual file management system:
 - a) maintaining the file register;
 - b) storing files not currently in use;
 - c) providing secure storage both in CSB and throughout the Office for files bearing classified markings;
 - d) opening new files on request;
 - e) closing files; and
 - f) managing the Office's file review programme, the purpose of which is to eliminate redundant information and reduce the bulk of records held, while ensuring no papers likely to be required for business continuity reasons and/or permanent preservation are destroyed.
7. The IT Section is responsible for addressing the electronic storage of records.

Divisions

8. Each Division is responsible for the information it creates. It should ensure that it has adequate systems in place for documenting its activities.

Staff

9. All staff including short-term appointments are required to:
 - keep complete and accurate records of a business activity;

- with the exception of those records which are to be stored and maintained electronically (refer to paragraphs 33 to 36 below), ensure that all relevant business related information, including emails and attachments, is placed on a registered paper file so that it:
 - can be readily retrieved by anyone so authorised; and
 - is available for public record purposes; and
- comply with the contents of this circular, including procedures for the disposal of records.

Management of Paper Records

Opening Files

10. Staff are not permitted to open new files or create their own series of files. They must make a request to CSB using the 'File Request Form', found at <Z:\Forms\General\File Forms\FILE REQUEST.doc>. All relevant information requested should be provided. The title of the file should be accurate and precise, reflecting the contents of the file. This will assist the locating and retrieval of the information.

File Categories

11. NIAO's filing system consists of seven file categories. Each caters for different aspects of the Office's work, has its own file colour and bears an identifying letter. The various categories, their colours and their identifying letters are as follows:

	<u>Colour</u>	<u>Letter</u>
Audit (Certification)	Buff	C
Audit (VFM)	Orange	V
Permanent	Pink	P
Permanent Computer	Mauve	D
General	Blue	G
Establishment	Green	E
Personal	Yellow	S
Assembly Questions	Red	A

Staff should note that from the date of this circular onwards there is no separate file category for files created in respect of audit and other papers relating to Local Government bodies. All L files series are now discontinued.

File Numbering

12. CSB will assign a file number to each new file opened. Each file number will contain, in order:
 - (1) the letter identifying the series to which the file belongs;
 - (2) the last two digits of the year in which it is opened; and
 - (3) its own unique number issued sequentially.

For example the fifty second file opened in 2011 in the certification category will be numbered as follows: C/11/052

File Covers

13. Papers for certain jobs may be better housed in alternative forms of file such as lever arch files while work is in progress. When the file is no longer in use responsibility lies with the Audit Branch for transferring the contents to the registered file cover in order to ease storage purposes.

Transmission and Control of Protectively Marked Files/ Transferring Files

14. **Staff are asked to ensure that the document security procedures set out in MIC 11/10 are adhered to for the transmission and control of protectively marked papers and when a paper file is transferred round the Office.**

Putting Away Files

15. Where a file is no longer in use it must be passed back to CSB for storage. The date, together with the letters 'PA', should be placed in the appropriate boxes on the front cover of the file. To assist the efficient storage of files staff should note that, as a general rule, the total thickness of papers on file should not normally exceed 1 inch or 2.5 cm. Where a file has reached this thickness the officer using it should ask CSB to open a further file. Such continuation files will bear their own unique identifying number and should be cross referenced to any previous file(s).

File Closure

16. All files should be closed by CSB five years after opening (with some exceptions e.g. personnel files) or earlier, if necessary. Once a file is closed no further papers should be added. CSB will attach Closure sheets to every file closed (this reminds staff requesting a closed file that no further papers should be added). It will also ensure that the date of the earliest and latest papers and the date of the **FIRST REVIEW** are clearly shown on the file cover. The word 'Closed' will be stamped on

the outside of the file. If, when a file is being closed, the subject to which it relates remains 'live', a continuation file should be opened.

17. Once CSB has identified all paper files for first review, Branch A4 will retrieve all Team21 files associated with the certification paper files and forward to the relevant Audit Manager for review in conjunction with the paper certification file review.

File Search

18. Staff have access to the file list from any networked computer. General and detailed searches can be made to find specific files or retrieve a list of files by following the instructions contained in **Annex 1 to this circular, which contains instruction to staff on how to access the file list data base.**

Filing - Practical Points

19. NIRMS (see paragraph 3(1)) provides practical points on filing practice which staff should follow. These are listed at **Annex 2.**

Disposal Scheduling

20. Division A, in consultation with members of staff responsible for the various functions within the Office, is responsible for preparing a Disposal Schedule for the Office. This involves examining all records to determine the disposal action to be taken. Decisions are based on the records' use and value to the Office's operations and/or legal obligations. Disposal schedules will set out the following for each record collection, series or system:
 - i. Disposal action (review, preserve permanently or destroy);
 - ii. Timing of disposal (a minimum period for which the records should be retained before disposal is undertaken).

The Disposal Schedule, which should be kept up to date, must be approved by PRONI and copied to relevant staff. **A copy of the NIAO Disposal Schedule is attached as Annex 3 to this circular. Division A is responsible for ensuring that disposal action is undertaken in accordance with the Disposal Schedule.**

21. APC 01/05 gives advice to staff on the retention and/or destruction of supplementary information collected during the course of a financial audit. Staff are reminded to take the guidance in this circular into account when deciding what records need to be maintained for audit purposes and for the purpose of reporting to the Public Accounts Committee.

File Review

22. Detailed guidance on the File Review Process is set out below.

Assessing the Value of Records

23. The destruction of records cannot be reversed. However, the cost of preserving records, which are not worthy of permanent preservation, is high. Thus the process of identifying and selecting records of permanent value is a very important task. When NIAO reviewers are assessing records for destruction/retention, they need only consider administrative requirements. In assessing these requirements, 'the reviewing officer', who should normally be at Audit Manager grade or above, should ask the following questions:

- i. Is there a continuing need to retain this record for the conduct of day-to-day business?
- ii. Is there a clear need of a further constant reference to this record?
- iii. Will it be needed to deal with enquiries in the future?
- iv. How many enquiries are likely?
- v. Is the information needed for statistical analysis within the organisation? Are there bodies of statistical information upon which future policies and forecasts may be based?
- vi. Is the information required for conducting legal proceedings in the event of a legal action being taken by, or against, the organisation?
- vii. Is there a legal requirement to retain these records (for example, health and safety regulations)?
- viii. Is there a financial need to retain these records (for example, for audit purposes)?
- ix. Is the information significant because it provides precedents or is required for authorisation purposes?
- x. Is the information otherwise available, whether within the NIAO or elsewhere, or in published form?

The First Review

When?

24. The first review takes place 5 years from the date of the last paper on the file and should not be later than 10 years from the opening of the file.

How?

25. After checking that the file is not identified on the Disposal Schedule as part of a class to be either destroyed or permanently preserved, CSB will forward it to the appropriate member of staff concerned with its subject matter. A standard First Review Form (pink) placed on the file asks the officer concerned with the subject matter to decide whether it should be retained and if so, how long it should be retained and to note the reason for retention. The officer's decision should be based solely on administrative need.
26. Except for those files identified on the Disposal Schedule as part of a class to be destroyed without reference to PRONI, NIAO must not destroy any records at First Review without referring them to PRONI. PRONI will examine those files earmarked for destruction so as to assess their potential historical importance.
27. NIAO is responsible for destroying those files which neither PRONI nor NIAO consider worthy of retention. Whole files must be destroyed. The Office will retain those files recommended by the Reviewing Officer for retention until they are due for Second Review

If the Reviewing Officer opts to review the file again at a date prior to the Second Review (see below), the file will then become part of the First Review cycle in that later year. E.g. A 2010 file will be first reviewed in 2020. If at first review stage the Reviewing Officer opts to retain the file for a further two years, the file will become part of the review cycle in 2022. If at that stage, the Reviewing Officer decides it can now be destroyed, it will be assessed by PRONI as part of the 2022 assessment.

28. Those files which, at First Review, the NIAO Reviewing Officer decides to destroy but which PRONI wishes to retain will be stored by NIAO until Second Review, when their fate will be decided by PRONI without reference to NIAO.

The Second Review

When?

29. The Second Review takes place 20 years from the date of the last paper on file

How?

30. PRONI staff will examine the records first of all, thus relieving NIAO staff of unnecessary reviewing. PRONI staff may need to discuss with NIAO staff some details about the records held. Those files selected for permanent preservation will then transfer to PRONI.
31. Those files marked for destruction will be examined by NIAO who will decide, again only on an administrative grounds, whether the file should be retained permanently. If retention is advised, the reason must be clearly stated on a Second Review form (green), which should be attached to the file. It is the responsibility of NIAO to retain such files and dispose of the after the period of retention has elapsed.

Weeding or Stripping Files

32. Many files contain duplicate or other ephemeral material where removal may reduce the bulk of papers retained but it is a very tedious task and rarely cost effective. More importantly, misunderstanding of the procedure could give rise to public criticism. It must be applied with the utmost caution and only after consultation with PRONI.

Good Practice

33. File Review is a continuous process. CSB invest a significant amount of time in the maintenance of the review register and the actual retrieving and circulation of files for review. File reviewers are required to return files being reviewed within **ONE WEEK** of receipt, but if this is not possible, they should consult with CSB.

Electronic Records

34. Electronic records are those that are created, communicated and maintained electronically. NIAO is still primarily a paper-based organisation; however our certification audit records are a combination of an electronic file and a paper file.
35. As set out in paragraph 17 above, these electronic files will now be subject to the same review action and disposal as the audit paper file.

Other

36. If you have any queries on this circular or would like advice on records management please contact Norma Connelly (Ext 51068).

37. For any queries regarding the operation of the file list please contact CSB (Ext 51000).

Dorinnia Carville
Director – Division A
15th September 2011

Accessing the File List

The file list can be found at:

<Z:\Circulars\File List>

The instructions for use are as follows:

1. When the database opens, select the **'Search for File'** button. (If this does not work a yellow bar will show at the top of your screen, click on this and select **'Allow this content'**, the button should now activate.)
2. Select the file type you are looking for by using the drop bar and enter a keyword. Note that the search is specific to the file title and entering a file number will not work.
3. If you want to see the complete file list for a certain file type, just select the category you want and leave the keyword search box blank.
4. If you wish to locate another file, right-click on the tab marked **'FileSearchCategory'** and select close, this will bring you back to the search menu.
5. When your search is complete, please close down the database.

If you have any queries or require assistance with the database, please contact Branch A1 (Ext: 51000).

Practical Points on Filing

Paper clips and pins should be removed from papers before filing, as these will damage the paper and when rusted can be a health hazard. Particular attention to this must be given to those records, which, according to the Disposal Schedule, are to be preserved permanently.

Floppy disks must not be stored on paper files. The disk is an unstable medium and it is easily corrupted. Moreover, its supporting software could be obsolete by the time the file and contents are subject to review. Convert disk contents to hard copy.

Flags, either adhesive tabs or strips of paper attached to a page with cellotape, should be avoided – instead use card dividers.

File covers should provide adequate protection for the papers and preferably have a flap which should be used to prevent papers becoming dog-eared. If they become tatty or torn, new covers should be prepared and the front of the old covers retained inside the new ones. Old covers form part of the original record.

Files should not be filled too full – they should not be more than 25 mm (one inch) thick. Bulky files should be closed and a continuation file opened and cross-referenced with the old part.

Files must not contain any loose papers.

Do not use metal tags – instead use the readily available plastic-ended ones.

Avoid the duplication of papers – only one copy of any piece of information should normally be filed on any one file.

Papers to be filed should be punched one inch in and one inch down from the edge to minimize the danger of detachment.

All papers received for filing should bear a file reference number.

Papers should be filed in date order with the most recent papers on top. This is very important as the review and access dates are calculated from the date of the last paper on the file and, if the latest document is not on the top, it is likely that the wrong terminal date will be assumed.

All papers should be filed on the right hand side of the file. Bulky or outsize items can be stored in a pocket or envelope inside the cover on the left hand side.

Source: PRONI Northern Ireland Records Management Standard March 2001

For the file categories listed below the retention/disposal action will be as follows:

- File Closed** *Once file is five (5) years old it is closed and no further papers added. This action is initiated by CSB (in conjunction with Branch A4 for electronic files)*
- First Stage Review** *Five years after a file is closed i.e. when a file is ten years old, files are circulated for first stage review*
- Second Stage Review** *This takes place 20 years from the date of the last paper on the file i.e. when file is 25 years old*

FILE CATEGORY	Ref	File closed	1st Review	Action following 1st Review	Action following 2nd Review
CERTIFICATION FILES					
Certification	C	After 5 years	After 10 years	After 10 years CSB will forward file to appropriate member of staff to either be destroyed, marked to be reviewed again at a later date or permanently preserved. Action to be taken will be noted on First Review form (pink)	PRONI will examine records. Any selected for permanent preservation will transfer to PRONI. Those marked for destruction will be examined by NIAO to ascertain if there is an administrative ground for retaining the file - if none then the file is destroyed
Certification LGA	C(L)				

The Team21 electronic files associated with the above paper certification files will be subject to the same review process

OTHER FILES		File closed	1st Review	Action following 1st Review	Action following 2nd Review
General LGA	L(G)	After 5 years	After 10 years	As above	As Above
VFM	V				
Permanent	P				
Computer	D				
Establishment	E				
General	G				
Assembly Questions	A				

FILES FOR PERMANENT PRESERVATION		File closed	1st Review	Action	
General	Audit Policy Circulars Management Information Circulars Personnel Policy Circulars Audit Committee Minutes Board Minutes Executive Team minutes	After 1 year		Permanently preserve	
Establishment	NIAO Legislation - development	After 5 years		Permanently preserve	

MISCELLANEOUS FILES FOR DESTRUCTION WITHOUT REFERENCE TO PRONI					
		File closed	1st Review	Action	ANNEX 3
Signed Accounts	G	File closed after 1 year	After 3 years	Destroy after 3 years without reference to PRONI	
Personnel	S			On retirement or resignation retain for two years and then destroy	
OTHER RECORDS					
		Retain For	1st Review	Action	
Self certified sick forms Medical certificates		2 years		Destroy after two years	
Bank Reconciliations Bank Statements Accounts Information PO Vouchers		7 years		Destroy after seven years	
Application Forms Recruitment Panel Papers		1 year		Destroy after one year	
Equality Monitoring Forms		3 years		Destroy after three years	