Report No. 57 of the Director of Audit — Chapter 10

RECORDS MANAGEMENT WORK OF THE GOVERNMENT RECORDS SERVICE

Summary

1. Records are valuable resources to support decision-making, meet operational and regulatory requirements, and provide accountability. The Director of Administration is responsible for developing and implementing the policy for the management of government records, including collecting and making accessible archival records. Bureaux and departments (B/Ds) are responsible for establishing their records management programmes in accordance with guidelines and requirements issued by the Director of Administration.

2. The Government Records Service (GRS), established under the Administration Wing, is tasked to oversee the overall management of government records and ensure that those having archival value are selected for preservation and public access. The Audit Commission (Audit) has recently conducted a review of the records management work of the GRS.

Overseeing of records management programmes

3. ***Requirements on records management programmes.*** In 2001, the Director of Administration issued the Records Management Manual (RMM) to prescribe the code of practices for establishing records management programmes in B/Ds, and the Guideline on the Management of Electronic Mail. In April 2009, the Director of Administration issued a General Circular setting some key RMM provisions and the Guideline on the Management of Electronic Mail as mandatory requirements. Audit notes that none of the RMM provisions on the creation of records are set as mandatory requirements. *Audit has recommended that the Director of Administration should consider setting mandatory requirements on the creation of records, with a view to ensuring that B/Ds create adequate but not excessive records.*

4. ***Records management studies.*** The RMM provides that the GRS may conduct records management studies for B/Ds and give them instructions and advice, so as to ensure accurate and complete documentation, safe retention, and efficient and cost-effective management of records. However, in all the studies conducted between 2002 and 2010, the GRS studied only the classification system for administrative records. Because of the limited scope, the studies could not fully achieve the intended objective. For one of the studies, Audit found that the GRS had not taken any follow-up action after receiving reports that the implementation of the recommendation would be deferred. *Audit has recommended that the Director of Administration should: (a) consider expanding the scope of records management studies so as to fully achieve the objective of such studies; and (b) review the procedures for following up the B/Ds' implementation of the GRS's recommendations and take appropriate measures to ensure that they promptly implement the GRS's recommendations in future.*

5. ***Records management surveys.*** The RMM provides that the GRS will from time to time conduct service-wide surveys of records management practices. However, the GRS did not conduct a service-wide survey until August 2010. Audit's analysis of the survey forms returned by B/Ds revealed that, as at 31 October 2010 (some nine years after the issue of the RMM), many B/Ds had not yet implemented certain key RMM provisions that have become mandatory requirements since April 2009. In addition, four departments had cases of loss or unauthorised destruction of records and many B/Ds had not fully adopted certain best practices. *Audit has recommended that the Director of Administration should: (a) conduct service-wide surveys at appropriate times after promulgating major records management practices so that any common implementation issues can be addressed in a timely manner; (b) draw up an action plan to address the issues identified in the 2010 survey; (c) conduct follow-up surveys to monitor B/Ds' compliance with the mandatory requirements; (d) consider taking more stringent measures in warranted cases; and (e) consider requiring B/Ds to conduct regular self-assessments of their compliance with the mandatory requirements and submit compliance reports to the GRS.*

6. ***Records management reviews.*** The RMM provides that, where circumstances warrant, the GRS will review the records management function of B/Ds to ensure compliance with the records management policies, procedures, directives and disposal authorities. However, the GRS has not conducted any such review. Audit selected the Fire Services Department, the Commerce and Economic Development Bureau and the Security Bureau for review, and found room for improvement in their records management. *Audit has recommended that the Director of Administration should conduct records management reviews of individual B/Ds to provide them with specific advice, training and assistance as appropriate. Audit has also made recommendations to the Director of Fire Services, the Secretary for Commerce and Economic Development and the Secretary for Security to address the issues identified in their records management.*

Storage and disposal services for inactive records

7. ***Storage and disposal of inactive records.*** The GRS operates a records centre to provide storage for the inactive records of B/Ds before final disposal. According to the GRS's guidelines, B/Ds should arrange timely disposal of the stored records in accordance with the disposal schedules. Audit found that: (a) 17,450 linear metres of the stored records were overdue for disposal; (b) another 15,115 linear metres of records were without disposal schedules; (c) some vacated storage space was not promptly put into use; and (d) some records were not properly packed leading to difficulties in their retrieval for disposal. *As the utilisation of the records centre is approaching its capacity limit, Audit has recommended that the Director of Administration should: (a) take additional measures to encourage B/Ds to take timely disposal action on their stored records; (b) for the records without disposal schedules, urge the departments concerned to finalise their disposal schedules; (c) implement procedures to ensure that vacated storage space is promptly put into use; (d) monitor B/Ds' compliance with the requirement that each deposit of records transferred to the records centre should only have one disposal date; and (e) keep the available capacity of the records centre under regular review to ensure that any demand for additional storage space can be provided in good time.*

8. ***Microfilming of inactive records.*** Instead of storing inactive records in the records centre, B/Ds may request the GRS to microfilm them before destruction. Based on the throughput of the GRS microfilming service in 2010-11 and the work in hand, there would unlikely be spare capacity to cope with new demand for the service in the coming three years. *Audit has recommended that the Director of Administration should: (a) review the overall demand for the GRS microfilming services of inactive records, archival records and library items; and (b) determine the short-term and long-term measures in meeting the service demand.*

Management of archival records

9. ***Appraisal of records for permanent retention.*** The GRS carries out records appraisal to determine what records have archival value and should be retained permanently, and what records may be destroyed. Audit found that: (a) as of June 2011, there were 59,000 outstanding appraisals (up from 18,000 in 2007) relating to 570 requests from B/Ds for records destruction; (b) 6 of the requests had been outstanding for six years or more, including 2 with delays in transferring the records to the GRS for appraisal; and (c) there were instances of non-compliance with the mandatory requirement that B/Ds should transfer time-expired records to the GRS for appraising their archival value if so required in the disposal schedule. *Audit has recommended that the Director of Administration should: (a) take effective measures to clear the backlog of records appraisals; (b) urgently follow up with the B/Ds concerned at an appropriate senior level the cases of delay in transferring to the GRS records requiring appraisals; (c) consider setting mandatory requirements for the prompt transfer by B/Ds of records to the GRS for its appraisal and taking more stringent measures if warranted by circumstances.*

10. ***Preservation of archival records.*** According to a survey in 2002, about 30% of 1,600 selected archival records and library items were in a deteriorated condition. Preservation strategies were proposed to prevent and retard any further deterioration of the archival and library holdings. Audit has found that there is room for improvement in the implementation of the strategies. For example, the GRS has not promulgated comprehensive guidelines on the proper handling, transport and storage of its archival and library holdings. *Audit has recommended that the Director of Administration should take measures to ensure that the 2002 strategies for the preservation of archival and library holdings are properly implemented.*

11. ***Safe custody of archival records.*** Custody and ownership of archival records transferred from B/Ds are rested with the GRS. However, the GRS has not conducted stocktaking of its archival records. For its library holdings, the GRS has checked only items purchased by it and cost $1,000 or more once a year. As regards the lending of archival records to B/Ds, Audit found that five departments had not returned 438 overdue archival records and six B/Ds had reported losses of 391 archival records. *Audit has recommended that the Director of Administration should: (a) require GRS staff to conduct periodical stocktaking of archival and library holdings; (b) review the arrangements of lending archival records to B/Ds, including exploring the feasibility of providing microfilm or digital images of the archival records for B/Ds' reference; and (c) urge the departments concerned to return the overdue archival records without further delay.*

12. ***Provision of reference and research services for the public.*** Accessioning is the process of registering and arranging the archival records before they are made available for public inspection. As of June 2011, there were 280,000 archival records pending accessioning. Audit noted that from 2008 to 2010, the GRS on average completed accessioning of 30,000 archival records each year. At this rate, it would take more than nine years to clear the backlog. *Audit has recommended that the Director of Administration should make greater efforts to clear the backlog of archival records pending accessioning.*

13. ***Access to archival records.*** According to the Public Records (Access) Rules 1996, archival records in existence for 30 years or more shall be made available for public inspection unless they contain information the disclosure of which would not be in the public interest. Since 1999, the GRS has conducted annual reviews to identify classified archival records created for 30 years and consult the B/Ds concerned on whether such records should be made available for public inspection. As of June 2011, the GRS had obtained B/Ds' confirmations on the access status for 72% of the records so identified. However, there were 1,137 records with access status not yet confirmed by 18 B/Ds. In addition, there were 627 records created by some former B/Ds for which the GRS had yet

to ascertain the current B/Ds responsible for confirming their access status. For some of these outstanding cases, the GRS sought B/Ds' confirmation of their access status in 1999 and 2000, i.e. more than 10 years ago. *Audit has recommended that the Director of Administration should: (a) expedite action on ascertaining the current B/Ds responsible for confirming the access status of the 627 archival records created by some former B/Ds; (b) set mandatory requirements specifying that B/Ds should confirm the access status of classified archival records within a reasonable time after they reach 30 years old; and (c) urgently follow up the long outstanding cases with the B/Ds concerned at an appropriate senior level.*

Development of electronic recordkeeping system

14. The GRS, together with the Efficiency Unit and the Office of the Government Chief Information Officer, started to study the use of an electronic recordkeeping system (ERKS) for the effective management of electronic records some 10 years ago in 2001. However, there is still a need for further work to address issues relating to the implementation of an ERKS in the Government. While such further work was identified in October 2009, only the work on refining the functional requirements was completed in May 2011. The work on other issues is still at different stages of planning and development. *Audit has recommended that the Director of Administration should, in collaboration with the Government Chief Information Officer and the Head, Efficiency Unit: (a) step up efforts to address the issues relating to the implementation of an ERKS in B/Ds; and (b) provide adequate support to B/Ds to facilitate their early implementation of an ERKS.*

Response from the Administration

15. The Administration agrees with the audit recommendations.

November 2011