RECORDS MANAGEMENT POLICY

OF

WESTERN CAPE GOVERNMENTAL BODIES

2017

FOREWORD

South Africa is an information society, that is, a society which recognizes the creation, distribution, use, integration and manipulation of information as a significant economic, political, and cultural activity. The important role played by information as an important factor in the process of government administration and management has also been recognized by Governments world- wide including the Western Cape. This recognition is because information feeds many kinds of activities that contribute to service delivery, such as, decision-making, planning, problem-solving, innovation, good governance and accountability. This information is kept in records. In an information society and in the digital working environment, recordkeeping and archiving are demanding and exciting because records are in various formats and Records Managers have to work in challenging multi-dimensional environments.

Records are created or received during the conduct of business and contain information and evidence of organizational activities. Public records are key to accountability and good governance because they reflect the government's functions, activities, procedures and the administrative processes that generate them, as well as the facts, acts, and transactions affiliated to them. In a nutshell, records enable governmental bodies to function. The important role of records in governmental bodies therefore cannot be under-estimated. Records prove what you did, why you did it and the results of that action. To be useful however, records must be managed effectively.

 The focus of records management is on the creation, evaluation, storage, access, retrieval, dissemination, use and disposition of records in any form or media. Records management is therefore not media specific or limited by time and space. Hence the Western Cape Archives and Records Service(WCARS) has adopted the Records Continuum Model (RCM) which integrates records management with business processes and society, upholds the continuous use of records and addresses management of both paper and electronic records.

The advent of technology has led some to assume that records management technologies and electronic records are to some degree, different and supersede paper records. This is because traditionally, the use of information technologies was not considered to be part of records management, but in essence, they are, in so far as the technologies are used for creating, maintaining, using or disposing recorded information. Records Managers therefore must stay abreast of current and emerging technologies, evaluate their potential impact on records management, and participate in their selection and use.

While the professional role of Records Managers is instrumental in every aspect of managing records, their role is that of providing guidance, training and oversight to records management practices in their respective offices. Records Management is the responsibility of every public official involved in one or more aspects of records management. This policy seeks therefore, to provide a high-level direction for managing records to all employees of Western Cape governmental bodies in terms of the Provincial Archives and Records Service of the Western Cape Act, 2005 (Act 3 of 2005).

Despite the crucial role played by records and records management, there is a consensus amongst researchers that many organizations including government departments pay little attention to the management of records. This policy is intended to draw attention to the importance of records and enhance sound records management practices in the Western Cape Province.

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Minister: Cultural Affairs and Sport
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Abbreviations

DCAS – Department of Cultural Affairs and Sport

ECM - Enterprise Content Management

ISO – International Organization for Standardization

ISO/IEC - International Organization for Standardization/International Electrotechnical Commission

ISO/TR - International Organization for Standardization/Technical Report

IT – Information Technology

MISS – Minimum Information Security Standards

RCM – Records Continuum Model

UFP – Uniform File Plan

WCARS – Western Cape Archives and Records Services

WCG – Western Cape Government

1. Purpose

The purpose of the policy is to provide direction to Western Cape Province governmental bodies on management of records for good governance, accountability as well as corporate and social memory.

2. Scope

This policy is applicable to management of records regardless of form or media, created or received in all governmental bodies, that is, any legislative, executive, judicial or administrative organ of state (including a statutory body) at Provincial, Regional and Local level in the Western Cape Province.

3. Legislative framework

- Electronic Communications and Transactions Act, 2002 (Act No 25 of 2002),
- National Archives and Records Service of South Africa Act, 1996 (Act No 43 of 1996 as amended),
- Public Finance Management Act, 1999 (Act No 1 of 1999),
- Promotion of Access to Information Act, 2000 (Act No 2 of 2000),
- Promotion of Administrative Justice Act, 2000 (Act No 3 of 2000),
- Protection of Personal Information Act, 2013 (Act No 4 of 2013),
- Provincial Archives and Records Service of the Western Cape Act (Act No 3 of 2005),
- South African Constitution, 1996 (Act No 108 of 1996)

4. Guiding model

This policy upholds the Records Continuum Model (RCM) which is a conceptual model that helps to understand and explore recordkeeping activities in relation to multiple contexts over space and time. Recordkeeping activities take place from before the records are created by identifying recordkeeping requirements in policies, systems, organizations, processes, laws, social mandates that impact on what is created and how it is managed over space and time. The RCM challenges the traditional view that separates archives and records as distinct entities. A continuum approach therefore highlights that records are both current and archival at the point of creation as it has been realized that records can be used continuously if they are considered to be of value at the time they are created.

According to the RCM, archival principles are applied throughout the life of a record. In the electronic environment, for instance, technical issues involved in keeping electronic records arise at the moment of their creation to their disposition. The stages that the records undergo are recurring and fall both within archives and records management. In addition, the model highlights the importance of records and archives management for both managerial and social responsibilities. Adoption of this records management model is thus aimed at facilitating access to records for business and public use as well as integrating and institutionalizing records and archives management with business processes in the Western Cape governmental bodies.

According to the RCM, there are four stages of records management, namely,

1. creation or receipt (business activities which generate records as evidence of business transactions);
2. classification (ensuring that the record is given the necessary elements such as file numbers and metadata so that it will be available over time);
3. establishment of retention/disposal schedules and their subsequent implementation
4. maintenance and use (use by creators and other stakeholders).

All four stages are interrelated, forming a continuum in which both Records Managers and Archivists are involved, to varying degrees, in the ongoing management of recorded information. Fundamental to this model are the integration of recordkeeping processes into the organization's business systems and processes and the continuing use of records regardless of media or form for transactional, evidentiary, and memory purposes.

5. Policy statements

5.1 Creation or receipt of records

Records creation and receipt is the responsibility of all staff, hence

5.1.1 records management in governmental bodies shall be integrated with the activities that promote the core mission and vision of the organization instead of being considered as an add-on section.

5.1.2 Records are created internally or received from external sources and bear evidence of internal and external activities of an organization. This evidential quality of records distinguishes them from any other type of information resource which may be produced and retained solely for reference purposes.

5.1.3 Records creation can occur in many ways using a variety of devices, such as personal computers, laptops and hand-held devices.

5.1.4 Records are important resources for planning, decision-making, accountability, good governance, research and to support service delivery. Creators of records must bear this in mind when records are created.

5.1.5 Records created in governmental bodies must be usable, accurate, authentic, have integrity, be reliable to ensure that their evidentiary value is accepted. For a record to be authentic, reliable, have evidential weight and legal admissibility,

    i. the record must bear all of the following:

- the logo and address of the creating organisation,
- record creation date,
- file reference number (from a file plan approved by WCARS),
- author/s of the record,
- addressee,

- signature of the author or delegate. In the case of electronic records, Sections 13(4) and 28(2) of the Electronic Communications and Transaction Act, 2002 (Act 25, 2002)apply,
- indication of attachments and or links to other records, and
- subject matter

ii. The record must be whole, unaltered and not reformatted. If for example, someone alters the minutes of a meeting after they have been approved, the minutes can no longer be considered an accurate record of the meeting. Complete and accurate records lead to efficiency and effectiveness, ensure straightforward audits and reduced legal risks.

iii. Records are created as evidence of decisions, actions and transactions, they therefore must be created at the time of the transaction or incident to which they relate, or soon afterwards, such as documenting the minutes of a meeting from recordings made during the meeting. Reliability will be apparent if there is evidence that the records were created and captured as part of a legitimate business process. The operational context or business process within which a record has been generated or managed should also be visible.

iv. Processes associated with individual records such as version control must be documented to reduce the risk of working from or updating the wrong version of a document or sending out the wrong version.

v. An electronic records management system used to create, provide access to and manage records (including hardware, software and network infrastructure must,

   a. be reliable, that is, be capable of continuous operation. Documentation to prove reliability must be kept and provided when needed,

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b. have security measures in place to protect records from unauthorized access, alteration or disposal,

c. be capable of implementing all records management processes according to the RCM,

d. be capable of retaining the authenticity, reliability and integrity of records should there be a system change, migration or discontinuation.

e. be approved by WCARS as stipulated in the Provincial Archives and Records Service of the Western Cape Act, 2005 (Act 3 of 2005).

vi. Enterprise Content Management (ECM)/MyContent is the approved electronic records management system for Western Cape Government (WCG) departments. The WCARS encourages local governmental bodies to use approved electronic records management systems.

5.2 Records classification

Records classification is an important method of procedural control over records creation (thus contributing to the reliability of records), as well as a critical means for the identification of records in context over time and space (thus contributing to establishing and maintaining the records authenticity). Records classification facilitates efficient management and retrieval of records and lays a foundation for other records management processes.

5.2.1 Records classification shall be performed when the record is created since the individual creating the record is in the best position to provide its proper classification. Records Managers however are responsible for the overall maintenance and management of the records classification system.

5.2.2 Records Managers shall compile records classification system which must be approved by the Western Cape Archives and Records Service before embarking on records management processes.

5.2.3 Amendments and additions can be done to records classification system when the need arises in consultation and approval by the WCARS.

5.2.4 WCARS has adopted the Uniform File Plan (UFP) as a transversal records classification scheme for use by Western Cape government departments. The benefit of the Uniform File Plan is mainly to standardize records management in the Western Cape government departments and provide easier access to governmental records. The UFP shall be the only records classification scheme used in the ECM/MyContent.

5.2.5 Other governmental bodies other than Western Cape government departments shall use records classification systems approved by WCARS.

5.2.6 Records classification systems must be used to assign file reference numbers to records created and received.

5.2.6 Records Control Schedules shall be developed for records other than correspondence.

5.3   Retention/disposal

5.3.1   Due to the evidentiary nature of records, it is important that they are retained Records shall be kept for as long as they are needed to satisfy operational, legal, regulatory, research or historical requirements.

5.3.2   All records irrespective of medium in which they are stored shall have a retention period.

5.3.3   Scanned records are for reference purposes and easier access and are not meant to be retained permanently. Retention periods assigned to their original paper-counter-parts shall be applicable. This also applies to print-outs of born-digital records.   If this is not done, physical and electronic storage, system performance, access and retrieval time frames can be compromised.

5.3.4   The Records Managers of governmental bodies shall develop a records inventory to provide an indication of the number, format and type of records

within that body and where they are stored, series description and recommended retention. The records inventory shall also be used to develop and update records retention schedules and analyse the value of records.

5.3.5 Appraisal of records shall take place when records series are determined. Where possible, the archival value of the record shall be determined during the appraisal process to ensure that the identified archival records are maintained properly until they are transferred to the WCARS.

5.3.6 Records retention schedules shall be developed by Records Managers to record retention periods. The Head of the government body shall nominate a team with decision-making powers and business professional knowledge to develop retention periods for the body. The retention schedules shall be reviewed regularly to effect changes which affect management of records, for example when new directorates or sections are created. The retention schedule can also be used to note the security classification of records.

5.3.7 Destruction of records poses a risk to any organisation and therefore must be approached with caution. Officials must not destroy any record without approval of the Head of the governmental body. The records manager must with the authorization of the Head of the government body, obtain written destruction approval from WCARS on behalf of the governmental body.

5.3.8 The file plan of the governmental body must be two years and older before application for disposal can be approved by WCARS.

5.3.9 Transfer of records to the archive, another governmental body, another office, electronic records management system, or to commercial off-site storage (including off-site data centres and cloud storage) shall take place in consultation with WCARS.

5.3.10 Commercial offsite storage areas are not recommended for storage of governmental bodies' paper records since records management processes ensure that there is a proper flow of records. However, if a need arises for off-site storage to be used, this shall be done in consultation with WCARS.

5.3.11 When approval has been granted to transfer records to the WCARS, arrangement for transfer of such records shall be made with the WCARS prior to the transfer of the records.

5.4 Maintenance and use

5.4.1 Records Managers shall develop a records management policy and procedures to ensure the overall administration of records management processes of the governmental body. The policy and procedures shall be approved by the WCARS.

5.4.2 It is however every official's responsibility to ensure that records in their care are protected from perils and any harmful materials which can damage records.

5.4.3 Records shall not be kept in offices but in the registry for central access, until their disposal or transfer. Access and use shall be according to registry procedures of the governmental body.

5.4.4 Inactive records shall be stored in the prescribed storage areas approved by WCARS. These records shall be organised logically to facilitate easier retrieval when needed, and transferred to the archive or destroyed at the appropriate time.

5.4.5 Security measures shall be in place in and around the registry and records storage areas to prevent unauthorised access.

5.4.6 Security classified records shall be managed and used according to Chapter 4 of the Minimum Information Security Standards (MISS) and ISO/IEC 27002:2005. Records Managers shall provide access to these standards.

5.4.7 Records manager shall conduct regular records inspections in their respective governmental bodies to ensure safety and security of records in use by officials and ensure that proper records management practices are in place.

5.4.8 WCARS shall conduct periodic records management audits in governmental bodies to monitor compliance to the Act and this policy.

5.4.9 Records Managers and Information Technology Officers shall develop disaster management and disaster recovery plans and submit them to WCARS for approval before implementation.

5.5 Training

5.5.1 All records management staff, including Records Managers, registry heads, work study officials, trainers and registry staff must attend the Western Cape Archives and Records Service's *Records Management Course* and Registry Clerks Course as well as any other training that might be offered from time to time to equip them for their specific responsibilities in terms of the Act. Records management staff shall in turn train other officials within governmental bodies.

5.5.2 Records Managers and IT practitioners are encouraged to embark on continuing professional development so as to keep up with trends and rapid changes in records management, relevant legislation and technology.

5.5.3 Records management is the responsibility of everyone who creates records, therefore training is compulsory for all staff of governmental bodies. All staff shall be trained to use an electronic records management system and notified of updates and changes.

5.5.4 Records Managers shall take advantage of information and communication technology to enhance staff training, such as e-learning, electronic records management guides and manuals.

6. Roles and responsibilities

6.1 The Head of the Western Cape Archives and Records Service is responsible for the proper management of public records in the custody of governmental bodies.

6.2 The Head of a governmental body shall appoint a Records Manager as stipulated in Section 9.5(a) of the *Provincial Archives and Records Service of Western Cape Act, 2005.*

6.3 The Head of the governmental body and the Records Manager must ensure compliance to the *Provincial Archives and Records Service of Western Cape Act, 2005* and this policy.

6.4 The Head of a governmental body with several components can appoint Assistant Records Managers for each component. These Records Managers however remain accountable to the Records Manager of the whole body.

6.5 The Records Manager in collaboration with the IT Department must ensure that electronic records in the custody of the governmental body are properly managed, accessed and secured.

6.6 Every employee therefore is responsible for creating and keeping such records as may be necessary to fully and accurately record the functions, transactions, operations, decisions, administration and management of the body.

7. Monitoring and review of policy

The Head of the Service shall periodically monitor implementation of this policy by governmental bodies. The policy will be reviewed when the need arises, to accommodate new developments and changes.

APPENDIX 1: Definition of key terms

Act: Provincial Archives and Records Services of the Western Cape Act, 2005(No.3 of 2005)

Classification: systematic arrangement of records in groups or categories according to established criteria

Off-site Storage: A remote storage facility or site equipped to provide protected storage for magnetic/optical media, microfilm, and paper records.

Record: recorded information arising from transactions. It is created as a by-product of social and organisational activity in the course of transacting business of any kind, whether by governments, businesses, community organisations or private individuals. It is therefore defined by its contextuality and transactionality. The documentation of transactions may be in any storage media and is increasingly an electronic process, such as, emails, internet content blogs, wikis, media sharing services, social networking systems, collaborative tools or any information that is paper based.

Records classification scheme a tool used to classify records based on the business activities that generate records and also referred to as a file plan. Records classification schemes are not based on organizational structure but reflect and support the organization's business functions and activities.

Records management: The capturing and maintaining of accurate, complete, reliable and useable documentation of activities of an organization in order to meet legal, evidential, accountability and social/cultural requirements.

APPENDIX 2: References

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